



999 N. Northlake Way
Suite 223
Seattle, WA 98103

PHONE: 206.406.3922
EMAIL: pschrappen@americanwaterways.com

Peter J. Schrappen, CAE
Vice President – Pacific Region

June 23, 2022

Dr. Whitney Hauer
Renewable Energy Specialist
Office of Strategic Resources
Bureau of Ocean Energy Management
760 Paseo Camarillo, Suite 102
Camarillo, CA 93010

Re: Call for Information and
Nominations-Commercial Leasing
for Wind Energy Development on
the Outer Continental Shelf (OCS)
Offshore Oregon
(BOEM-2022-0009)

Dear Dr. Hauer:

On behalf of the American Waterways Operators (AWO), I appreciate the opportunity to comment on the U.S. Bureau of Ocean Energy Management's (BOEM) Call for Information and Nominations for wind energy development commercial leases offshore Oregon.

AWO is the tugboat, towboat, and barge industry's advocate, resource, and united voice for safe, sustainable, and efficient transportation on America's waterways, oceans, and coasts. Our industry safely and efficiently moves over 665 million tons of cargo each year, including more than 60% of U.S. export grain and significant bulk and containerized cargoes transported along the Pacific Coast. These vessels emit significantly less greenhouse gasses than other modes – rail emits 43% more and trucks emit 832% more – while also reducing congestion and improving safety.

As leaders in maritime safety, security, and environmental stewardship, AWO members are committed to working with government to advance these shared objectives. AWO's commitment to environmental stewardship includes aiding the development of renewable energy, including wind energy development. In a recent interview, AWO President & CEO Jennifer Carpenter referred to offshore wind as "the biggest new opportunity for the domestic maritime industry in decades." Domestic vessels will move turbine components, aid in the construction of wind energy developments, and service and maintain wind farms throughout their operational life. As we develop this promising new industry in the U.S., it is important to

ensure that offshore wind energy developments not become navigational hazards that jeopardize mariner safety, endanger vessels and cargo, and/or disrupt the already strained supply chain on which the nation's economy depends. AWO has long urged BOEM to recognize customary vessel traffic lanes and coastwise navigation as it considers potential sites for renewable energy projects.

It is difficult to know exactly what impact the two call areas offshore Oregon will have on navigation safety without the completion of the U.S. Coast Guard's (USCG) Pacific Coast Port Access Route Study (PACPARS). This ongoing study, which could be released in 2022, will contain navigation safety information from towing vessel operators and will examine the safety implications offshore wind siting could have on towing vessels. PACPARS is an essential step in ensuring the continued safety and efficiency of navigation along the Pacific Coast.

Unfortunately, we remain concerned about the misaligned timelines on which BOEM and the USCG are operating. We have seen instances on the Atlantic Coast where BOEM has leased wind energy areas before the USCG has implemented the recommendations of the Atlantic Coast PARS. This has created conflicts – for example, in Delaware Bay – where USCG is now unable to provide the full fairway width necessary for towing vessel safety, to the detriment of both mariner safety and the efficient flow of maritime commerce.

We are also concerned about potential conflicts once the PACPARS is completed. The possibility exists that the Coos Bay and Brookings Call Areas could conflict with a nearshore safety fairway along the Oregon Coast. We appreciate your coordination so far to exclude the Crabber/Towboat lanes from these call areas. However, once wind turbines are in the water and commercial navigation is geographically constrained, with more vessels transiting a narrower space, the width of the Crabber/Towboat lanes will be insufficient for safe navigation. We expect the USCG to establish a significantly wider nearshore fairway than is presently available. (The Atlantic Coast PARS determined that nine nautical miles was necessary to maintain safe navigation for the towing industry.) To ensure the safe coexistence of commercial navigation and offshore wind farms, we urge BOEM to wait for the completion of PACPARS before moving to the next step in the lease process.

We appreciate BOEM and the USCG working together to learn from experiences on the Atlantic Coast, where challenges have arisen due to lack of communication and collaboration between BOEM, USCG, and impacted stakeholders, and we have already seen improved coordination on the West Coast thanks in large part to the forums BOEM has provided. To that end, we respectfully request that BOEM formalize a commercial navigation working group. This formalized communication and coordination mechanism, with regular updates and forums for timely feedback, would improve outcomes for all. The initial BOEM-led meeting that occurred on May 23, 2022, could serve as a model for future collaboration.

While offshore wind promises environmental and economic benefits, human safety is paramount as we plan for developing future energy resources. Put another way: We should not jeopardize navigation safety as we work together to develop this exciting new field of renewable energy.

Thank you for the opportunity to comment. AWO would gladly answer any questions or provide further information as BOEM sees fit. Our 78-year history speaks to our commitment to tugboats, towboats, and barges operating safely on our nation's waterways while serving the nation's supply chain.

Sincerely,

A handwritten signature in black ink, appearing to read "Peter Schrappen". The signature is written in a cursive style with a large initial "P" and a long, sweeping underline.

Peter Schrappen
Vice President – Pacific Region