



47 Patricia Drive
Covington, LA 70433

PHONE: 985.222.5230
EMAIL: mwright@americanwaterways.com

Mark A. Wright
Vice President – Southern Region

April 25, 2023

Ms. Tershara Matthews
Chief, Office of Emerging Programs
Bureau of Ocean Energy Management
1201 Elmwood Park Boulevard
New Orleans, LA 70123

Re: Proposed Sale Notice for Commercial
Leasing for Wind Power Development on
the Outer Continental Shelf in the Gulf of
Mexico (Docket No. BOEM-2023-0021)

Dear Ms. Matthews:

The American Waterways Operators (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 is the largest segment of the nation's 40,000-vessel domestic maritime fleet and moves 665 million tons of cargo each year safely and efficiently. Our industry will play a critical role in the construction, maintenance, and operation of U.S. offshore wind installations, and we look forward to helping to facilitate the Administration's goal of generating 30 gigawatts of offshore wind energy by 2030.

AWO members lead the maritime industry in safety, security, and environmental stewardship. We are committed to working with federal and state governments to advance these shared objectives, and AWO members continually strive for zero harm from our industry's operations – to human life, to the environment, and to property. To that end, AWO looks forward to continuing to work with BOEM, other government agencies, and industry stakeholders to minimize safety risks posed by offshore wind energy projects.

On behalf of AWO's member companies, thank you for the opportunity to comment on the Proposed Sale Notice for the commercial offshore wind leases in the Gulf of Mexico. Our members support increased development of offshore renewable energy, and we thank BOEM for coordinating with the U.S. Coast Guard and the maritime industry to ensure the preservation of existing navigation lanes for safe navigation. It is critical that wind energy projects not produce navigational hazards that put mariners, vessels, or the environment at risk or obstruct the movement of cargo and commodities on which the nation's economy depends. AWO encourages ongoing communication to deconflict wind energy areas with historic towing vessel navigation routes.

AWO is pleased that the three Gulf of Mexico leases proposed in this notice have been established at least two nautical miles (NM) from navigation safety fairways. AWO has previously requested a setback of at least 2 NM in comments to BOEM and the Coast Guard. This spacing will promote navigational safety as vessels transit the Gulf of Mexico, giving operators more time to adhere to the Rules of the Road and react in the case of an unforeseen safety incident. This is especially important as sea space becomes more crowded with wind turbines, oil and gas structures, and planned aquaculture areas, further constraining safe navigation routes in the Gulf of Mexico.

The Biden Administration and numerous states have set ambitious targets for offshore renewable energy generation. Gulf of Mexico wind power development can play a crucial role in meeting those goals and providing economic opportunity for U.S. workers. With recent clarification from Congress and U.S. Customs and Border Protection, the offshore renewable energy market will provide significant opportunities to U.S. mariners, vessel operators, and shipyards. As we move forward with this economic and environmental opportunity, navigation safety must be secured so that the maritime transportation system can coexist with offshore wind and other ocean uses.

Thank you again for the opportunity to comment. AWO looks forward to continued engagement as this process moves forward.

Sincerely,

A handwritten signature in black ink, appearing to read "Mark A. Wright". The signature is written in a cursive, flowing style.

Mark A. Wright
Vice President – Southern Region