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Peter J. Schrappen, CAE  
Vice President – Pacific Region

August 1, 2022

Ms. Sara Gultinan  
Pacific Regional Office  
Bureau of Ocean Energy Management  
760 Paseo Camarillo  
Camarillo, CA 93010

Re: Proposed Sale Notice Pacific  
Wind Lease Sale 1 (Docket No.  
BOEM-2022-0017)

Dear Ms. Gultinan:

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) proposed sale notice for commercial leasing for wind power on the Outer Continental Shelf in California Pacific Wind Lease Sale 1.

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. The tugboat, towboat, and barge industry supports more than 23,600 careers and contributes \$3.6 billion in labor income in California.

Seven AWO member companies are headquartered in California. Many more of our members operate tugboats and barges in California waters. These vessels help move more than 239 million tons of goods each year. They also emit far less greenhouse gases than rail (rail emits 43% more) or trucks (trucks emit 832% more) while reducing congestion and improving safety.

As leaders in maritime safety, security, and sustainability, AWO members are committed to working with government partners to advance these shared objectives. AWO's commitment to environmental stewardship includes aiding the development of offshore wind energy, the biggest new opportunity for the domestic maritime industry in decades. Domestic vessels will move the turbine components, aid in the construction of wind energy structures, and provide other services, ranging from maintenance to crew transfer.

As offshore wind projects are sited and developed, it is very important that wind farms not become navigational hazards that jeopardize crews' lives, endanger vessels and cargo, and/or disrupt the already strained supply chain on which the nation's economy depends. Hopefully, this concern sounds familiar as AWO has long urged BOEM to recognize customary vessel traffic lanes and coastwise navigation as potential sites for renewable energy projects are considered.

It is difficult to know exactly what impact these lease areas 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 will have implications for both offshore construction and maritime operations. PACPARS is an essential step in ensuring navigation can continue safely and efficiently along the Pacific Coast. AWO members appreciate that BOEM has committed in the notice to working with the USCG on PACPARS. We also appreciate BOEM's acknowledgment in the public notice that mitigation measures may be required in the construction and operation plan once the navigation safety risk assessment (NSRA) is completed. AWO strongly requests that BOEM involve AWO members and other maritime stakeholders in NSRAs conducted for this and other wind energy areas.

We disagree with the statement in the *Measures for Vessel Transit* section that "The information currently available does not indicate that vessel routing mitigation measures are warranted...." The proposed lease areas are in the middle of traditional towing and deep draft vessel routes. Space will only grow more crowded as more structures are constructed. In that same section of the notice BOEM states that lease stipulations may be included in the final sale notice depending on discussions with the Coast Guard and other stakeholders. This is an important caveat that AWO will continue to monitor.

AWO will continue to engage closely with the USCG as the PACPARS moves towards a standing regulation to ensure the leases do not interfere with safe vessel traffic. However, there remain concerns about the timelines at which BOEM and the USCG are operating. We have seen instances on the Atlantic Coast where BOEM has proceeded more quickly in the leasing process than the USCG has in the PARS process. This has resulted in areas – such as Delaware Bay – where USCG is unable to provide the needed nine-nautical-mile fairway necessary for towing vessel safety.

It has been stated in related notices that BOEM does not consider issuance of a lease to constitute approval to build in the entire lease area. However, the best time to ensure that conflicts between navigation safety and wind farm development can be avoided is early in the process. So again, we ask that you work closely with USCG and allow the agency time to establish the appropriate navigation safety measures.

We appreciate BOEM and the USCG working together to learn from experience on the East Coast, where challenges have sometimes arisen due to lack of communication and collaboration between BOEM, USCG, and impacted stakeholders. We have already seen improved coordination on the West Coast thanks in large part to the engagement by your office

as well as your counterparts in Oregon. BOEM's engagement with the transportation industry through direct meetings is a worthwhile forum to collaborate and identify win-win solutions.

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 develop this exciting new field of renewable energy.

Thank you for the opportunity to comment on this emerging issue. 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 moving safely through our nation's waterways while serving the nation's supply chain.

Sincerely,

A handwritten signature in black ink, appearing to read "Peter Schrapen". The signature is written in a cursive style with a large initial "P".

Peter Schrapen  
Vice President – Pacific Region