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Brian W. Vahey  
Vice President – Atlantic Region

February 13, 2023

Ms. Jessica Stromberg  
BOEM Office of Renewable Energy Programs  
45600 Woodland Road  
Sterling, Virginia 20166

Re: Notice of Availability of the Draft  
Environmental Impact Statement  
for the Coastal Virginia Offshore  
Wind Commercial Project  
(BOEM-2022-0069)

Dear Ms. Stromberg,

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 fleet and moves 665 million tons of cargo each year safely and efficiently. On behalf of AWO's more than 300 member companies, we appreciate the opportunity to comment on the Coastal Virginia Offshore Wind Project draft Environmental Impact Statement.

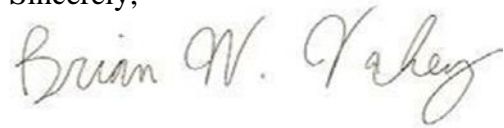
AWO members lead the maritime industry in safety, security, and environmental stewardship. We are committed to working with federal and state agencies to advance these shared objectives. Our commitment to sustainability includes strong support for the development of alternative energy resources. However, it is critical that such projects not produce navigational hazards that put vessels and their crews at risk or obstruct the movement of commodities on which the nation's economy depends. It is with these concerns in mind that we have worked closely with the Bureau of Ocean Energy Management and the U.S. Coast Guard on previous requests for comment on wind energy development areas.

We appreciate the efforts BOEM has undertaken to deconflict navigation routes and offshore wind development off the Virginia coast. However, we have concerns about the placement of offshore export cables from the Coastal Virginia Offshore Wind project. If a vessel must lower an anchor during an emergency situation, vessel operators must be sure that they will not inadvertently strike an underwater cable, which could be dangerous to mariners and the

environment. Export cables from this project and others should not be located within navigation routes and fairways. If a cable must be laid in one of these areas, best practice is for it to cut perpendicularly across the route and be buried at least 15 feet deep to minimize the risk of damaging the cables and threatening mariner safety and the environment. AWO supports the cable placement in the proposed alternative as long as the cables are buried at least 15 feet deep where they cross navigation areas.

Thank you again for the opportunity to comment on this issue and for your commitment to keeping America's supply chain safe and efficient. I would be pleased to provide additional comments or further information as you see fit.

Sincerely,

A handwritten signature in cursive script that reads "Brian W. Vahey". The signature is written in a dark ink and is positioned below the word "Sincerely,".

Brian Vahey  
Vice President – Atlantic Region