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Peter J. Schrappen, CAE
Vice President – Pacific Region

October 26, 2023

Ms. Jean Thurston-Keller
Project Coordinator
Pacific Regional Office – Renewable Energy Section
Bureau of Ocean Energy Management
760 Paseo Camarillo, Suite 102
Camarillo, CA 90101

Re: Draft Wind Energy Areas –
Commercial Leasing for Wind
Power Development on the Oregon
Outer Continental Shelf (OCS)
(BOEM-2023-0033)

Dear Ms. Thurston-Keller:

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. On behalf of AWO's more than 300 member companies, we appreciate the opportunity to comment on the draft Oregon Wind Energy Areas (WEAs).

AWO members lead the maritime industry in safety, security, and environmental sustainability. 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 renewable 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. With this perspective in mind, we have worked closely with the Bureau of Ocean Energy Management and the U.S. Coast Guard on previous requests for comment regarding offshore wind energy development.

We support the proposed WEAs and appreciate that BOEM has removed areas that previously overlapped with navigation safety fairways recommended by the Coast Guard's Pacific Coast Port Access Route Study (PACPARS). These areas would have conflicted with safe navigation and posed a hazard to mariner safety, the safety of sensitive cargoes, and the efficiency of maritime commerce.

We encourage BOEM to continue proactive engagement with the Coast Guard and maritime stakeholders. Engagement throughout the leasing process allows for problems to be addressed and for conflicts to be resolved in a timely manner. We thank you for your efforts to engage with industry and Coast Guard thus far, and we look forward to continued 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 79-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 Schappin". The signature is written in a cursive style with a large initial "P".

Vice President – Pacific Region