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Brian W. Vahey
Vice President – Atlantic Region

April 8, 2024

Ms. Brandi Sangunett
NEPA Coordinator
BOEM Environment Branch for Renewable Energy
45600 Woodland Road
Sterling, Virginia 20166

Re: Notice of Intent to Prepare an Environmental Assessment for Commercial Wind Lease Issuance, Site Characterization Activities, and Site Assessment Activities on the Atlantic Outer Continental Shelf in the Gulf of Maine Offshore the States of Maine, New Hampshire, and the Commonwealth of Massachusetts (BOEM-2024-0020)

Dear Ms. Sangunett,

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 Wind Energy Areas in the Gulf of Maine.

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. 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.

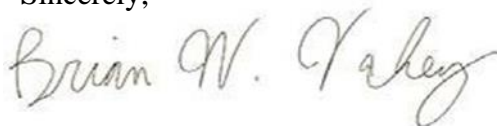
In our comments of October, 2023 on the draft Wind Energy Areas in the Gulf of Maine, we expressed concern with what was at the time called *Secondary Area C*. This area was almost completely within the *Gulf of Maine Fairway*, which cuts across the Gulf of Maine from Massachusetts Bay heading to the Bay of Fundy. It would appear that *Secondary Area C* is included as part of the final Wind Energy Area. Establishing a lease within the fairway would imperil navigation traversing the Gulf of Maine. It would also reduce the amount of space vessels have to turn into or out of the *Portland Eastern Approach Fairway* as vessels travel to and from Portland, Maine through the *Eastern Approach Traffic Separation Scheme*. This action would create serious navigation hazards and severely impact the supply chain.

It is important at this early stage of the offshore wind leasing process to identify and avoid areas where conflicts with navigation are likely to occur. Attempting to mitigate navigation safety issues after the lease area has been open for bids is a far more difficult problem to solve than avoiding such conflicts from the start. Therefore, an alternative should be included in the environmental review that would see the portion of the WEA that conflicts with the proposed fairway removed from leasing consideration.

In closing, AWO actively supports the development of offshore wind energy, which we view as a win-win for environmental sustainability and increased economic opportunities. Establishing safe routes for navigation and developing lease areas that avoid conflicts will ensure that this new maritime industry can grow while maintaining mariner and navigation safety.

Thank you again for the opportunity to comment. 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 dark ink and is positioned above the typed name and title.

Brian Vahey
Vice President – Atlantic Region