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Peter J. Schrappen, CAE
Vice President – Pacific Region

May 13, 2022

Ms. Jean Thurston-Keller
California Intergovernmental Renewable Energy Task Force Coordinator
Office of the Environment, BOEM
760 Paseo Camarillo
Camarillo, CA 93010

Re: Morro Bay Wind Energy Area
Draft Environmental Assessment
(BOEM-2021-0044)

Dear Ms. Thurston-Keller:

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) Draft Environmental Assessment for the Morro Bay wind energy area.

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 in California and contributes \$3.6 billion in labor income.

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 gas than rail (rail emits 43% more) and or trucks (trucks emit 832% more) while reducing congestion and improving safety.

As leaders of maritime safety, security, and environmental stewardship, 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 renewable energy, and in particular, wind energy development. In a recent interview, AWO President Jennifer Carpenter said, "Offshore wind is the biggest new opportunity for the domestic maritime industry in decades." Domestic vessels will move the turbine components and aid in the construction of these wind energy developments. However, such projects must 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. AWO has long urged BOEM to recognize customary vessel traffic lanes and coastwise navigation as it considers potential sites for renewable energy projects. Even though this environmental assessment (EA) only considers site assessment and characterization activities, it is still important for BOEM to consider all environmental and economic impacts resulting from the sale of leases and construction of wind farms at an early stage, including increased risk of spills to water and increased greenhouse gas emissions from cargo that is shifted onto land-side transportation.

It is difficult to know exactly what impact these call 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 contain navigation safety information from towing vessel operators and will examine the safety implications of offshore construction for towing vessels. PACPARS is an essential step in ensuring navigation can continue safely and efficiently along the Pacific Coast. Thank you for committing in the EA to working with the USCG on PACPARS. AWO will also engage closely with the USCG and BOEM as this study proceeds. However, we remain concerned 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 full nine-nautical-mile fairway necessary for towing vessel safety because it seems USCG does not believe they have the authority to establish navigation safety lanes once a lease has been sold.

We recognize that in the Morro Bay EA, you have stated that you do not consider issuance of a lease to constitute approval to build in the entire lease area. However, we believe 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 you and your office as well as your counterparts in Oregon. A formalization of that partnership to provide regular updates and timely feedback would improve the outcome for all. A commercial navigation working group would be helpful in that regard.

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

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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" and a long, sweeping underline.

Peter Schrapen
Vice President – Pacific Region