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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 a Draft
Environmental Impact Statement
for Sunrise Wind, LLC's Proposed
Sunrise Wind Farm Offshore New
York (BOEM-2022-0071)

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 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 Sunrise Wind Farm 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.

Although the Sunrise Wind Farm does not appear to conflict with traditional towing vessel navigation routes, we remain concerned that the cabling for the proposed project would only be buried 3 to 7 feet deep. As we noted in our previous comments, 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

Docket No. BOEM-2022-0071

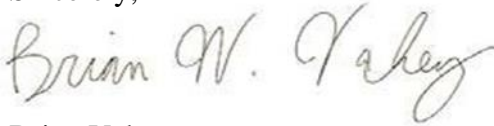
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environment. Cables from this project should be buried at least 15 feet deep to ensure that they are neither struck nor snared during an emergency anchoring operation. This is a best practice that is being followed in other wind projects and Sunrise Wind should follow the same parameters here to minimize the risk of damaging the cables and threatening mariner safety and the environment.

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 ink is a light grey or blue color.

Brian Vahey

Vice President – Atlantic Region