



47 Patricia Drive
Covington, LA 70433

PHONE: 985.222.5230
EMAIL: mwright@americanwaterways.com

Mark A. Wright
Vice President – Southern Region

August 1, 2022

Mr. Andrew Richard
Regional Aquaculture Coordinator
Southeast Regional Office
National Marine Fisheries Service
263 13th Avenue South
St. Petersburg, FL 33701

Re: Notice of Intent to Prepare Programmatic
Environmental Impact Statement for
Identification of Aquaculture Opportunity
Areas in Federal Waters of the Gulf of
Mexico (Docket No. NOAA-NMFS-2022-
0044)

Dear Mr. Richard:

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 Notice of Intent to prepare a programmatic environmental impact statement (PEIS) for identification of aquaculture opportunity areas in federal waters of the Gulf of Mexico.

As our shared sea spaces grow more crowded, AWO members remain committed to leading the maritime industry in safety, security, and environmental stewardship. We actively work with government partners to advance these shared objectives, and AWO members are committed to the goal of zero harm from our industry's operations – to human life, to the environment, and to property. We ask that the National Marine Fisheries Service (NMFS) and the National Oceanic and Atmospheric Administration (NOAA) work alongside the other federal agencies overseeing the various uses of our ocean resources, such as the Bureau of Ocean Energy Management (BOEM) and the U.S. Coast Guard, to ensure that different initiatives can coexist safely and productively.

To preserve navigation safety, NOAA and NMFS should coordinate with the U.S. Coast Guard in seeking detailed information from the maritime industry about vessel traffic patterns before establishing aquaculture areas that may conflict with traditional traffic routes. Gulf of Mexico safety fairways were established in the 1960s to protect navigation routes; however, those routes are no longer adequate for modern needs. Vessels have increased in size and traffic patterns have changed since the fairways were established. When determining which areas are suitable for aquaculture, you should keep in mind that the existing safety fairways do not necessarily provide what is needed for navigation safety today.

Offshore wind will further impact a Gulf of Mexico already filled with oil and gas structures. The Biden Administration has set ambitious targets for offshore renewable energy generation this decade. To meet this goal, BOEM is examining outer continental shelf waters in the central and western parts of the Gulf of Mexico. When determining which areas are suitable for aquaculture, NOAA and NMFS must consider potential conflicts with offshore wind energy and how this will further impact safe navigation. The seascape will change dramatically in the coming decade and restricting the flow of safe and efficient tug and barge traffic without the establishment of adequate navigation lanes will imperil human life, risk environmental harm, reduce the carbon efficiency of the transportation sector, and harm the U.S. economy.

NOAA and NMFS should communicate and collaborate with the Coast Guard, BOEM, and the navigation industry to determine how additional uses of the Gulf of Mexico will impact other uses. New uses must be carefully planned to safely coexist with the existing maritime transportation system and navigation routes. We must work together to ensure the safety and productivity of shared marine resources.

Thank you for the opportunity to comment on this notice. We would be pleased to answer any questions or provide further information as you see fit. We look forward to continued engagement on this issue.

Sincerely,

A handwritten signature in black ink, appearing to read "Mark A. Wright". The signature is fluid and cursive, with the first name "Mark" being the most prominent.

Mark A. Wright
Vice President – Southern Region