



755 Winslow Way East  
Suite 105B  
Bainbridge Island, WA 98110

PHONE: 203.980.3051  
EMAIL: [ccostanzo@americanwaterways.com](mailto:ccostanzo@americanwaterways.com)

Charles P. Costanzo  
General Counsel & Vice President – Pacific Region

September 13, 2021

Ms. Jean Thurston-Keller  
California Intergovernmental Renewable Energy Task Force Coordinator  
BOEM, Office of Strategic Resources  
760 Paseo Camarillo (Suite 102)  
Camarillo, CA 93010

Re: Commercial Leasing for Wind  
Power on the Outer Continental  
Shelf Offshore Morro Bay, CA,  
East and West Extensions – Call  
for Information and Nominations  
(BOEM-2021-0044)

Dear Ms. Thurston-Keller:

The American Waterways Operators (AWO) is the national trade association for the U.S. tugboat, towboat, and barge industry. Our industry is the largest segment of the nation's 40,000 vessel Jones Act fleet and moves more than 760 million tons of cargo each year safely and efficiently. This includes more than 60 percent 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 15,310 jobs in California and contributes \$1.1 billion in labor income. More than \$51 billion worth of goods are moved on California waters each year, reducing greenhouse gas emissions by 26% over rail and 90% over trucks.

Seven AWO member companies are headquartered in California, and many more operate tugboats and barges in California waters. These vessels help to move tens of millions of tons of freight on California waterways, reducing congestion on the state's highways and railroads while producing significantly fewer pollutants than trucks and trains.

On behalf of AWO's West Coast operators, I appreciate the opportunity to comment on the U.S. Bureau of Ocean Energy Management's call for information and nominations for the proposed extensions at Morro Bay.

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 resources. However, it is critical that such projects not become navigational hazards that put vessels and their crews at risk or obstruct the movement of goods on which the nation's economy depends. As such, AWO has long urged BOEM to recognize customary vessel traffic lanes and coastwise navigation as it considers potential sites for renewable energy projects on the outer continental shelf.

The proposed lease area at Morro Bay is situated within an area with significant commercial shipping activity, including coastal tug and barge traffic. Siting offshore wind energy developments in areas that conflict with commercial traffic routes increases the likelihood of marine casualties. Additionally, coastal tug and barge traffic, which traditionally operates closer to shore, could be forced farther offshore and into the operating areas of larger and often faster container ships, vehicle carriers, tankers, and passenger ships.

The U.S. Coast Guard has recently announced a Port Access Route Study (PARS) of the Pacific Coast from Washington to California. This Pacific Coast PARS (PACPARS) will evaluate safe access routes for vessel traffic and determine whether shipping safety fairways are needed to safeguard mariners, vessels, and offshore installations. It is difficult to know how the East and West Extensions to the Morro Bay Call Area will impact navigation safety without knowing the results of the PACPARS. Therefore, AWO asks that BOEM refrain from issuing competitive lease sales until after the completion of the PACPARS. This will afford BOEM, maritime stakeholders, and wind energy developers a chance to better understand the navigation impacts of developing the Morro Bay Call Area and the East and West Extensions.

AWO members support offshore wind development from an environmental sustainability perspective as well as from a business opportunity perspective. It will be domestic vessels moving the turbine components and aiding in the construction of these wind energy developments. However, it is imperative that safe navigation is not impeded. While offshore wind promises environmental and economic benefits to California and the nation, we should not compromise navigation safety in the process of developing these resources.

Thank you for the opportunity to comment on this emerging issue. AWO would be pleased to answer any questions or provide further information as the Bureau sees fit.

Sincerely,



Charles P. Costanzo  
General Counsel & Vice President – Pacific Region