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Peter J. Schrappen, CAE
Vice President – Pacific Region

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LCDR Sara Conrad
Pacific Area (PAC-54)
U.S. Coast Guard
1800 Dennison St
Alameda, CA 94501

Re: Port Access Route Study: The
Pacific Coast From Washington to
California (USCG-2021-0345)

Dear LCDR Conrad:

On behalf of the American Waterways Operators (AWO), thank you for the opportunity to comment on the U.S. Coast Guard's notification of study for the Pacific Coast Port Access Route Study (PACPARS).

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. These vessels emit significantly less greenhouse gasses than other modes – rail emits 43% more and trucks emit 832% more – while also reducing congestion and improving safety.

As leaders in maritime safety, security, and environmental stewardship, AWO members work with government partners to advance our shared objectives. Our commitment to environmental stewardship includes aiding the development of renewable energy, including wind energy. At the same time, such projects must not become navigational hazards that jeopardize crews' lives and endanger vessels. We urge the Coast Guard to utilize work that has already been done on offshore wind safety to expedite this study. AWO looks forward to continuing to work with the Coast Guard, the Bureau of Ocean Energy Management (BOEM), other government stakeholders, and industry partners to minimize the navigation safety risks posed by offshore structures.

It was with this safety goal in mind that the Coast Guard-AWO Safety Partnership's Atlantic Region Quality Steering Committee developed the *Safe Navigation Around Structures Quality Action Team (QAT)* in 2014. The QAT was tasked with establishing basic safety practices to

allow the Coast Guard and AWO to make better informed recommendations on the siting of offshore structures. The work also took into account how towing vessel navigation routes and best practices are likely to evolve in the future. Through this comprehensive effort, the Coast Guard and industry experts developed Marine Planning Guidelines for Towing Vessels to inform the safe locations for offshore wind projects and other structures. These guidelines include a nine-mile Safe Navigation Corridor to preserve vital shipping lanes by prohibiting construction of offshore structures, including cables, in designed navigation safety fairways.

The Coast Guard should incorporate the extensive and collaborative work already completed on the Atlantic Coast into the Pacific Coast Port Access Route Study. Towing vessel operations on the Atlantic and Pacific coasts are quite similar, and their safety concerns when navigating around structures are likewise similar.

It is important to emphasize that the Coast Guard must also perform a thorough assessment of traffic patterns and traditional navigation routes on the Pacific Coast. There is a large amount of coastwise traffic between Seattle and Los Angeles/Long Beach, and the ports along this route routinely face congestion challenges. Furthermore, many vessels operating in Pacific Coast waters prefer to operate 20 to 25 miles offshore as this distance gives them more time to respond in the face of inclement weather or emergency situations. In addition, tugboats on the Pacific Coast typically use a chain rather than a wire rope when towing barges astern. These chains weigh more than the ropes typically used on the Atlantic Coast, resulting in a deeper draft that must be planned for, especially for undersea structures like anchors and cables.

We appreciate the Coast Guard's thoughtful consideration of navigation safety needs as planning for offshore wind development on the Pacific Coast proceeds, but we are concerned that the Bureau of Ocean Energy Management (BOEM) is moving forward to establish wind energy areas without waiting for completion of a PARS. We urge the Coast Guard to coordinate with BOEM so that we do not experience the same problems that have occurred on the Atlantic Coast, where BOEM has moved faster on leases than the Coast Guard has moved on safety fairways, resulting in conflicts. Without delay, we encourage the Coast Guard to undertake an expedited and holistic approach to conduct the PACPARS and ensure fairways are established to guarantee safe and efficient navigation lanes.

AWO is confident that offshore wind and navigation safety can coexist, and our members have affirmed their support for offshore wind development from an environmental and business-opportunity perspective. 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 wind energy developments. However, wind farms must be sited so as not to compromise safe navigation. 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 issue. AWO would gladly answer any questions or provide further information as the Coast Guard sees fit. Our 76-year history

speaks to our commitment to tugboats, towboats, and barges moving safely and efficiently through our nation's waterways and our comments here reflect our time-tested and consistent track record.

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".

Peter Schrapen
Vice President – Pacific Region