



999 N. Northlake Way
Suite 223
Seattle, WA 98103

PHONE: 206.406.3922
EMAIL: pschrappen@americanwaterways.com

Peter J. Schrappen, CAE
Vice President – Pacific Region

February 5, 2022

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: Humboldt Wind Energy Area
Draft Environmental Assessment
(BOEM-2021-0085)

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) Environmental Assessment Scoping for the Humboldt Wind Energy Area (WEA).

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 support more than 23,600 careers in California and contributes \$3.6 billion in labor income.

Seven AWO member companies are headquartered in California. Plus, many more of our members operate tugboats and barges in California waters. These vessels help to move more than 239 million tons of goods each year and help reduce greenhouse gas emissions by 43% over rail and 832% over trucks while also reducing congestion and improving safety.

We have recently submitted comments to BOEM regarding the Morro Bay Energy Area. In those comments we shared our concerns about the potential safety impacts of obstructed navigation routes and urged BOEM to ensure that it has access to a completed U.S. Coast Guard Pacific Coast Port Access Route Study before the agency finalizes lease sales in the region. That study is necessary to ensure a full assessment of any navigation safety concerns that these California wind energy areas may present. Therefore, our concerns with this wind energy area at this moment remain the same.

To sum up our concerns, AWO members are leaders in maritime safety, security, environmental stewardship, and 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, including wind energy. However, such projects must not become navigational hazards that jeopardize crews' lives, endanger vessels, or hamper the already strained supply chain on which the nation's economy depends. Navigational hazards can lead to environmental damage without proper planning to avoid or minimize them. As such, AWO has urged BOEM to recognize customary vessel traffic lanes and coastwise navigation as it considers potential sites for renewable energy projects.

Safety is a top priority for AWO. Anything that imperils safe navigation is a threat to both the environment and socio-cultural considerations. The proposed Humboldt wind energy area 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 collisions and casualties. West Coast tug and barge operators require adequate distances to operate safely in a variety of traffic densities. Reducing the area available for safe navigation will increase the risk of collisions and groundings. This environmental assessment must consider the environmental and socio-cultural impacts of narrowed navigation routes. On the Atlantic Coast, the Coast Guard determined through its Atlantic Coast Port Access Route Study that 9 nautical miles was the necessary width for safe towing vessel navigation fairways.

The Coast Guard is now undertaking 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 fairways are needed to safeguard mariners, vessels, and offshore installations. It is difficult to know how the Humboldt wind energy 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 comprehensive, systems-approach PACPARS. This sequence of events will afford BOEM, maritime stakeholders, and wind energy developers the opportunity to make better long-term strategic decisions for the nation's environment and economy.

AWO members have affirmed our support for offshore wind development from an environmental sustainability perspective as well as from a 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 emerging issue. AWO would gladly answer any questions or provide further information as BOEM sees fit. Our 76-year history speaks to our commitment to tugboats, towboats, and barges moving safely through our nation's waterways and our comments here reflect that 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, prominent initial "P".

Peter Schrapen
Vice President – Pacific Region