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Brian W. Vahey  
Vice President – Atlantic Region

October 18, 2024

Mr. Seth Theuerkauf  
Renewable Energy Program Specialist  
Office of Renewable Energy Programs  
Bureau of Ocean Energy Management  
45600 Woodland Road  
Sterling, Virginia 20166

Re: Commercial Leasing for Wind  
Power Development on the Central  
Atlantic Outer Continental Shelf-  
Central Atlantic 2-Call for  
Information and Nominations  
(BOEM-2024-0040)

Dear Mr. Theuerkauf:

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 Central Atlantic Call Area 2 Call for Information.

AWO members lead the maritime industry in safety, security, and environmental sustainability. 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 renewable energy resources. However, such projects should not produce navigational hazards that jeopardize vessels and their crews or obstruct the movement of commodities on which the nation's economy depends. With these concerns in mind, 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.

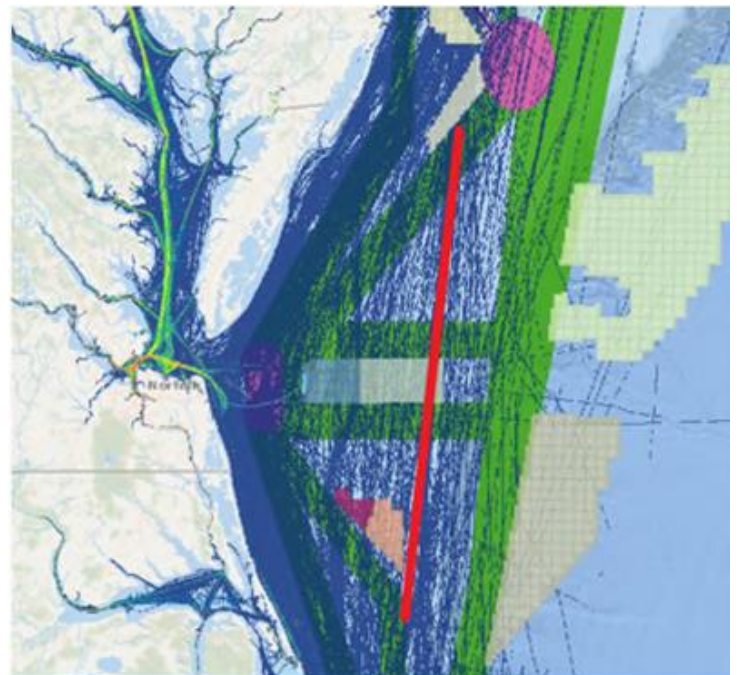
Call Area 2 covers a large expanse of Central Atlantic waters from New Jersey to the southern border of North Carolina. Much of these near-shore waters are traditional navigation routes for towing vessels moving cargoes essential for the United States economy. The Coast Guard is in

the midst of a rulemaking process to establish navigation safety fairways to formalize navigation routes and ensure safe operations in increasingly crowded waters. Many safety fairways have already been proposed throughout Call Area 2. These areas should be removed from consideration. Any wind energy areas that are developed as a result of this leasing process must not conflict with safety fairways or traditional navigation routes.

The Central Atlantic is the most problematic coastal area in regards to conflicts between navigation and offshore wind development. Early lease development in this area, particularly off Delaware Bay, has significantly restricted the Coast Guard's ability to protect safe navigation space for coastal towing vessels and barges, resulting in proposed fairways that are too narrow and disjointed for optimal navigation safety. Allowing additional offshore wind leases in this area could further jeopardize safe navigation and create greater tensions between users of this sea space.

In comments on the Coast Guard's Notice of Proposed Rulemaking (NPRM) for the Atlantic Coast Fairways, AWO has requested the expansion of the nearshore and connector fairways off Delaware Bay as much as possible to give vessel operators more space to safely navigate in this congested area. This request is especially important in this region because shoaling areas, like Fenwick Shoal and Avalon Shoal, effectively halve the amount of usable space vessels have to safely navigate within the currently proposed fairways. There is little space to expand these fairways because of the offshore wind leases already in the area. Allowing more leases that crowd the spaces between existing leases and the fairways would create even more challenging operating conditions. Therefore, BOEM should not establish wind energy areas in the narrow spaces between existing leases and proposed fairways in the Delaware Bay.

In our comments on the Atlantic Coast Fairways NPRM, we also requested the establishment of a new fairway offshore Chesapeake Bay that would give vessel operators the option to avoid congestion at the mouth of the Bay and continue their journey north across the Chesapeake Bay North and South Connector fairways and connect with the Chesapeake Bay to Delaware Bay Eastern Approach Cutoff Fairway (represented by the red line in the image to the right). A fairway in this area would allow vessels to continue this north-south navigation route without being forced into the Bay or further offshore than they feel safe navigating. We ask that BOEM avoid creating wind energy areas along this path so that vessel operators can continue to transit the area safely.

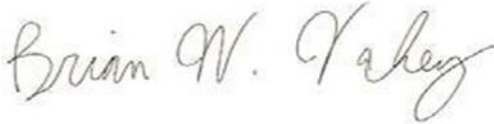


It is important to identify and avoid areas where conflicts with navigation are likely to occur before leases are granted and construction and operations plans are developed. Avoiding navigation safety conflicts from the start is an easier proposition than attempting to mitigate navigation safety issues after a lease area has been opened up for bid.

In closing, AWO actively supports the development of offshore wind energy, which we view as a win-win for environmental sustainability and increased economic opportunities. Establishing safe routes for navigation and developing lease areas that avoid conflicts will ensure that this new industry can grow while maintaining mariner and navigation safety.

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 signature is written in dark ink and is positioned above the printed name and title.

Brian Vahey  
Vice President – Atlantic Region