



May 12, 2021

Rear Admiral Thomas G. Allan, Jr.
Commander
U.S. Coast Guard First District
408 Atlantic Avenue
Boston, MA 02110

Re: [Docket USCG-2020-0278](#)
Submitted via <http://www.regulations.gov>

Dear Admiral Allan:

In response to the *Federal Register* supplemental notice of study¹ published by the U.S. Coast Guard (USCG) on April 12, 2021, the American Clean Power Association² (ACP) and the New York Offshore Wind Alliance³ (NYOWA) appreciate this opportunity to provide supplemental comments regarding the Northern New York Bight Port Access Route Study (NNYB PARS). The American Wind Energy Association (AWEA), which joined NYOWA in filing extensive comments⁴ on August 28, 2020, during the original comment period, merged into ACP on January 1, 2021.

After reviewing the recently finalized wind energy areas⁵ (WEAs) published by the Bureau of Ocean Energy Management (BOEM), as well as comments filed by other parties in response to the original comment period on the NNYB PARS, ACP and NYOWA stand by the recommendations in our August 2020 comments. Below we reiterate some of the key points and evidence from those comments and highlight aspects of the final WEAs that reinforce our recommendations.

As previously stated, navigation safety is a priority of the U.S. offshore wind industry. ACP, NYOWA and our members strongly believe that offshore wind in the U.S. can be constructed

¹ Federal Register, Vol. 86 No. 68, pages 18996-18997, available at: <https://www.govinfo.gov/content/pkg/FR-2021-04-12/pdf/2021-07469.pdf>

² ACP is the national trade association representing the renewable energy industry in the United States, bringing together over 1,000 member companies and a national workforce located across all 50 states with a common interest in encouraging the deployment and expansion of renewable energy resources in the United States. By uniting the power of wind (both land-based and offshore), solar, storage, and transmission companies and their allied industries, we are enabling the transformation of the U.S. power grid to a low-cost, reliable, and renewable power system. Additional information is available at <http://www.cleanpower.org>.

³ The New York Offshore Wind Alliance (NYOWA) is a diverse coalition of business, environmental, labor and community organizations with a shared interest in promoting the responsible development of offshore wind power for New York. NYOWA is a project of the Alliance for Clean Energy New York (ACE NY). For more information, see: www.nyowa.org

⁴ The August 28, 2020, AWEA-NYOWA comments are available in the NNYB PARS docket at: https://downloads.regulations.gov/USCG-2020-0278-0020/attachment_1.pdf

⁵ Available at: <https://www.boem.gov/renewable-energy/state-activities/new-york-bight>

and operated in ways that are compatible with mariner safety and safe vessel navigation. The ability to balance these interests, without sacrificing either, has been demonstrated globally for more than a decade.

Summary

To follow is a summary of the main points made in this comments:

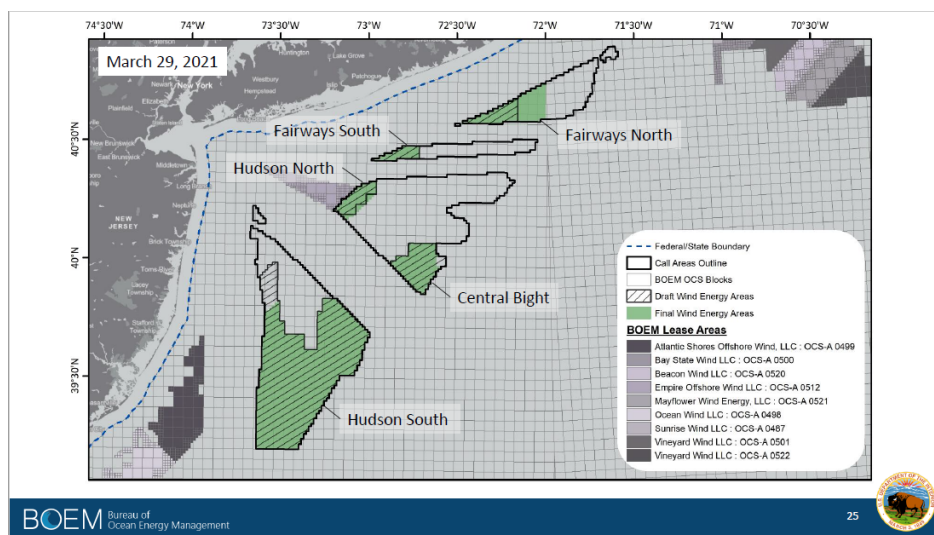
1. Since the last comment period, BOEM published final WEAs, which included changes to address some vessel navigation concerns.
 - a. BOEM published five final WEAs: Fairways North, Fairways South, Hudson North, Hudson South, and the Central Bight.
 - b. BOEM significantly adjusted the final areas from those originally proposed as call areas, and even from the draft WEAs proposed in November 2018, after more than three years of consideration and stakeholder input.
 - c. Several of the changes made were to address vessel navigation concerns.
 - d. USCG should incorporate these accommodations in the NNYB PARS analysis.
2. BOEM recommends, and ACP and NYOWA support, consideration of additional navigation issues on a project-specific basis, including any recommended buffers.
3. Finalized WEAs reinforce points made in AWEA/NYOWA August 2020 comments, including:
 - a. Growing state demand for offshore wind requires additional leasing in the New York Bight, which necessitates a balanced approach to deployment and navigation.
 - b. Existing safety measures in New York harbor and the New York Bight are sufficient.
 - c. The sufficiency of existing safety measures is confirmed by vessel data analysis.
 - d. Uniform 2 nm buffers between turbines and shipping lanes suggested by some commenters are not necessary and are inconsistent with the international experience.
 - e. ACP and NYOWA continue to support revising the path of the proposed Cape Charles to Montauk Point tug and tow shipping fairway
4. Coastal high frequency radar is a “solvable problem” and should not influence the NNYB PARS analysis.

Since the last comment period, BOEM published final WEAs, which included changes to address some vessel navigation concerns

On March 29, 2021, BOEM published five final WEAs: Fairways North, Fairways South, Hudson North, Hudson South, and the Central Bight.⁶ BOEM significantly adjusted the final areas from those originally proposed as call areas, and even from the draft WEAs proposed

⁶ Summary of the WEAs is available on the BOEM website here: <https://www.boem.gov/sites/default/files/documents/renewable-energy/state-activities/NYBight-Wind-Energy-Areas-Summary.pdf>. GIS shape files of the WEAs are available here: <https://www.boem.gov/renewable-energy/state-activities/wind-energy-area-shape-files>

in November 2018, after more than three years of consideration and stakeholder input. Several of the changes made were to address vessel navigation concerns.⁷ The figure below from BOEM’s slide deck⁸ presented during the New York Bight Task Force meeting on April 14, 2021, shows how the areas were reduced in size from the original call areas to the draft WEAs to the final WEAs. The original call areas are outlined in black. The draft WEAs contain the diagonal lines. And the final WEAs are shaded green:



As we noted in our August 2020 comments, in the New York Bight call area proceeding, BOEM has already removed the following areas from consideration due to navigation safety concerns:⁹

- Between the Hudson North and Hudson South Call Areas, an area 30 nm in length and approximately 15 nm wide from the entrance/exit of the New York Southeastern Approach (Hudson Canyon to Ambrose and Ambrose to Hudson Canyon traffic lanes).
- All sub-blocks that overlap with a 1 nm buffer along all outer edges of traffic lanes, shipping safety fairways, and the above-mentioned 30 nm delineated area.

Further, in the decision memo on the final WEA designations, BOEM highlights additional accommodations that were made during the area identification process to address navigation concerns, including those of commercial fishermen. The USCG should incorporate these accommodations in the NNYB PARS analysis.

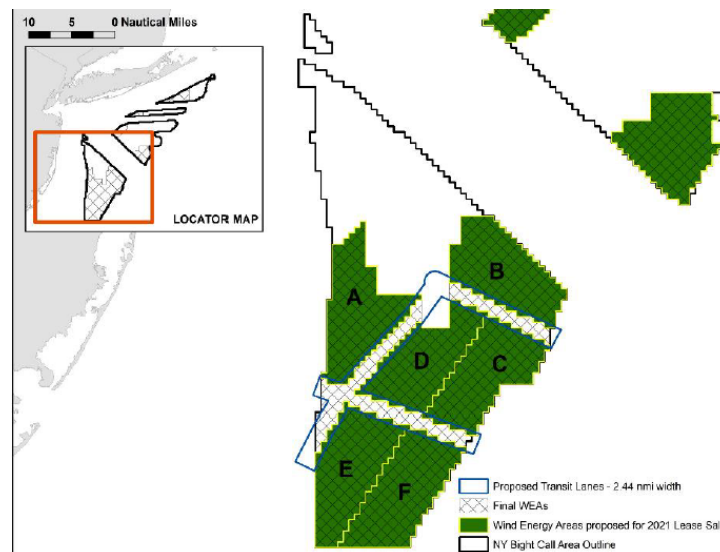
⁷ Available at: <https://www.boem.gov/sites/default/files/documents/renewable-energy/Memorandum%20for%20Area%20ID%20in%20the%20NY%20Bight.pdf>

⁸ Available at: <https://www.boem.gov/renewable-energy/state-activities/luke-feinberg-outer-continental-shelf-wind-energy-leasing>

⁹ Federal Register, Vol. 83 No. 70, April 11, 2018, pages 15602-15617. Available at: <https://www.boem.gov/sites/default/files/regulations/Federal-Register-Notices/2018/83-FR-15602.pdf>

- The original call areas “did not include for leasing consideration the Mid-Atlantic Scallop Rotational Area – an important scallop resource management area along the southern border of the Hudson South Call Area.”
- With respect to the final Hudson South WEA:
 - “The main considerations from a navigation perspective were the tug and tow safety fairway, existing deep draft vessel traffic patterns, and a USCG weapons training area. In consultation with the USCG, it is likely that even if it is possible to relocate portions of the proposed tug and barge safety fairway to deconflict the Hudson North and Fairways North and South areas, a portion of Hudson South would still be in conflict. As such, BOEM has removed the area of the Hudson South Call Area that conflicts with the proposed fairway.”
 - In addition, “The USCG weapons training area in the northern portion of the Hudson South Call Area, as well as relatively higher volumes of vessel traffic in that area, were factors in excluding that portion of the Hudson South Call Area from the WEA.”
 - Further, as shown in Figure 1 below from the April 2021 BOEM slide deck, BOEM is proposing to sub-divide the Hudson South WEA into six different lease areas to accommodate multiple transit lanes of 2.4 nautical miles in width:

Figure 1. Proposed Lease Areas – Hudson South



- BOEM notes they plan to further consider these transit lanes and they may be adjusted in response to inter-agency discussions and stakeholder input prior to any leases being auctioned.

Per the NNYB PARS, ACP/NYOWA recommend that consideration of transit corridors through any **existing** lease areas should only be considered in project-specific navigation

safety risk assessments (NSRAs) and the federal environmental review and public comment on a project's proposed construction and operations plan (COP) under the National Environmental Policy Act (NEPA).

- With respect to Fairways North and Fairways South, in the April 2021 BOEM slide deck, the Bureau noted they do not plan to consider leasing in these areas in 2021 "in part, due to maritime traffic, proposed fairway, commercial fisheries, and commercial viability."

BOEM recommends, and ACP and NYOWA support, consideration of additional navigation issues on a project-specific basis

BOEM noted in the decision memo that navigation concerns will be further considered and addressed prior to the proposed and final sale notices, which are precursors to lease areas being auctioned, as well as through project specific NSRAs that are incorporated into COPs, which are then subject to federal environmental review and public comment under the National Environmental Policy Act (NEPA). This is consistent with the ACP and NYOWA August 2020 comments in which we noted navigation safety issues are often more appropriately considered via project-specific analysis in NSRAs.

As BOEM explains in the memo: "The goal of BOEM's Area ID process is to identify the offshore locations that are most suitable for leasing. The Area ID determination must take into consideration multiple competing uses and environmental concerns that may be associated with a proposed area's potential for commercial wind energy development. Potential impacts of a specific proposed renewable energy facility in the identified areas would be addressed during the review of a Construction and Operations Plan (COP), since it is then when project-specific information becomes available."

BOEM goes on to explain why a lease does not mean the end of the road for consideration of navigation safety or any other concerns about proposed projects in lease areas: "If there were a lease sale, the issuance of a lease would grant to the lessee only the exclusive right to submit a plan proposing development of the leasehold to BOEM for approval. The lease would not, by itself, authorize any activity within the lease area. Therefore, BOEM does not consider the issuance of a lease to constitute an irreversible and irretrievable commitment of agency resources toward the construction of a wind energy facility."

Examples of navigation issues BOEM acknowledges require additional consideration during the proposed and final sale notifications and/or in project specific NSRAs/COPs include:

- Tug and tow fairway
 - "BOEM understands that some of the recommended WEAs (or portions thereof) may ultimately not be offered as lease areas. For instance, BOEM is aware that some of the recommended areas overlap with proposed navigation corridors. As described in the navigation section above, the USCG is currently pursuing a regulatory initiative to convert historical tug and tow vessel routes into safety fairways... For the purposes of this effort,

BOEM is working closely with the USCG and stakeholders and believes that there is space within the NY Bight to safely accommodate both offshore wind and tug and tow traffic aspirations. The process to designate this fairway is in its early stages, and the fairway width and location are still undetermined. Given this uncertainty, BOEM has decided to include areas with potential overlap for further consideration and will continue to work with the USCG in the planning process to identify an outcome that provides for both navigation safety and opportunities for offshore wind development.”

- Buffers
 - With respect to the Fairways North WEA, BOEM “considered a 2 nm buffer between the fairway and the recommended WEA but decided not to implement the buffer in this recommended WEA and to rely on future navigation safety risk assessments to evaluate site-specific safety issues.”
 - Similarly, with respect to the Central Bight WEA, BOEM notes it “could conflict with existing deep draft vessel traffic patterns if fully built out.” BOEM goes on to suggest, “Site-specific navigation concerns would be assessed as part of a Navigational Risk Assessment at the COP stage, which, based on additional analysis of traffic concerns and proposed turbine layouts, may result in the imposition of mitigation measures.”
 - ACP/NYOWA support further considering these issues in project-specific proceedings (NSRAs and COPs) and, as described in more detail later in these comments, encourage the Coast Guard not to recommend uniform 2 nm buffers.
 - Further, the Cape Charles to Montauk Fairway was designed with stakeholder input and vessel traffic assessment in mind through the Atlantic Coast Port Access Route Study (ACPARS) process and, therefore, should represent a suitable width as proposed for the needs of the lane.

Finalized WEAs reinforce points made in AWEA/NYOWA August 2020 comments

1. *Growing state demand for offshore wind requires additional leasing in the New York Bight, which necessitates a balanced approach to deployment and navigation*

The U.S. offshore wind industry is on the verge of significant growth. A balanced, flexible, project-specific approach to addressing potential impacts can better balance the need to ensure safe navigation with state demand for offshore wind and the economic and environmental benefits that will result.

There are 26,000 megawatts of offshore wind potential in the lease areas BOEM has auctioned in the Northeast and Mid-Atlantic if fully built out. In just 2019 alone, states cumulatively increased their targets for offshore wind by more than 16,000 megawatts. Currently, state targets total more than 29,000 megawatts by 2035.¹⁰ Additional leasing in

¹⁰ U.S. Wind Industry Annual Market Report for the Year Ending 2019. American Wind Energy Association. Available at: https://www.awea.org/resources/publications-and-reports/market-reports/2019-u-s-wind-industry-market-reports/amr2019_executivesummary

the New York Bight is essential to meet the demand for offshore wind in New York and surrounding states.

2. Existing safety measures in New York harbor and the New York Bight are sufficient

As explained in detail in our August 2020, comments, the entry to and exit from New York harbor includes several safety measures such as monitoring and notification requirements, active vessel traffic management, enhanced communication, voyage planning, traffic separate schemes (TSSs), fairways, and precautionary areas, among others. ACP and NYOWA continue to believe these measures are sufficient to provide for safe navigation even with the presence of wind turbines in the Bight.

3. The sufficiency of existing safety measures is confirmed by vessel data analysis

As detailed in the AWEA/NYOWA August 2020 comments, an independent report¹¹ done for the New York State Energy and Research Development Agency (NYSERDA) found most vessels operating in the study area were cargo vessels (51%) with tankers second (34%). The remaining vessels are other, i.e., USCG, military, dredging, diving vessels etc. (8%), tug and tow (3%), passenger (1.6%) and fishing (1.4%). AWEA pulled 2019 AIS data from the Northeast Ocean Data Portal for the NNYB PARS study area. This data was largely consistent with the 2011, 2013 and 2014 data used by Renewables Consulting Group (RCG) for the NYSERDA vessel navigation report.¹² The NYSERDA report also utilized NOAA VMS data from the Northeast Fisheries Science Center to capture fishing vessel data.

Importantly, the NYSERDA report finds that cargo vessels and tanker vessels predominantly follow existing fairways and TSSs.¹³ Further, it found tug and tow traffic is most dense along the coastline. Therefore, the existing fairways and TSSs are sufficient to ensure safe vessel navigation through the New York Bight.

With respect to fishing vessels, the NYSERDA report found, “The analysis demonstrates that fishing vessels do not use fairways and TSSs other than to cross them on route to or returning from fishing grounds. Relatively high vessel counts were recorded at ports and harbor entrances, but vessels appear to rapidly disperse or converge (depending on inbound or outbound direction) along coastal routes and harbors of origin and/or at fish landing sites.”¹⁴

¹¹ Available at: <https://www.nyserdanyc.gov/-/media/Files/Publications/Research/Biomass-Solar-Wind/Master-Plan/17-25q-Shipping-and-Navigation.pdf>

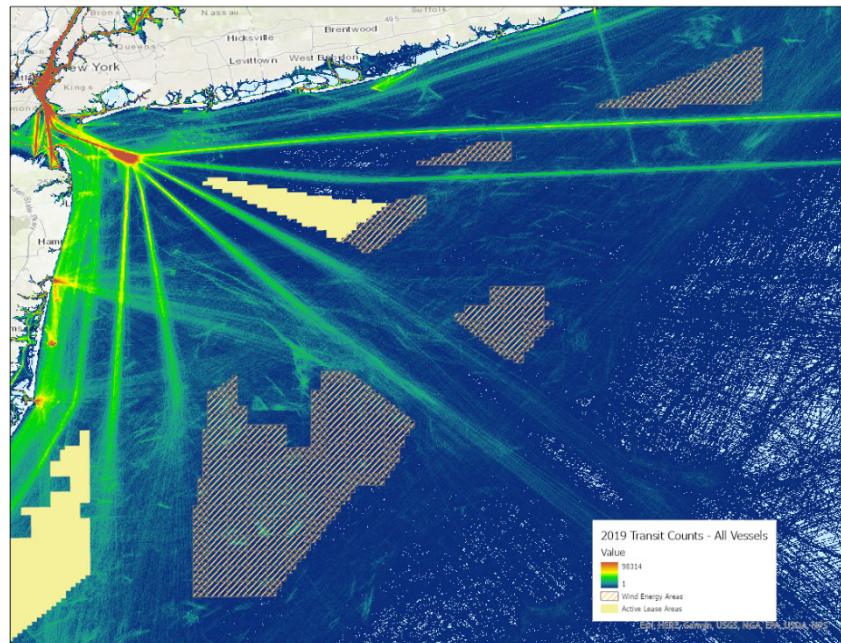
¹² Available at: <https://www.nyserdanyc.gov/-/media/Files/Publications/Research/Biomass-Solar-Wind/Master-Plan/17-25q-Shipping-and-Navigation.pdf>

¹³ Ibid. pages 24 and 26.

¹⁴ Ibid. Page 33. The report explains the methodology for fishing data as follows, “Data obtained from NOAA and the NEFSC were mapped in a 10-minute-square grid to show fishing activity (number of trips observed in each grid square) for mobile gear types (e.g., trawls, dredges, and purse seines) and stationary gear types (e.g., gillnets, hand lines, longlines, pots and traps). These maps (Figures 20 and 21) were overlaid with AIS data on fishing vessel speeds using a threshold of < 5 knots to show stationary fishing.”

Based on a map ACP created of 2019 vessel traffic¹⁵ (Figure 2) overlaid with the existing Equinor lease, as well as the final WEAs published by BOEM it appears to ACP and NYOWA that those areas were sited by BOEM in a way that address heavy concentrations of vessel traffic, including fishing vessels.

Figure 2. All Vessel Traffic, 2019



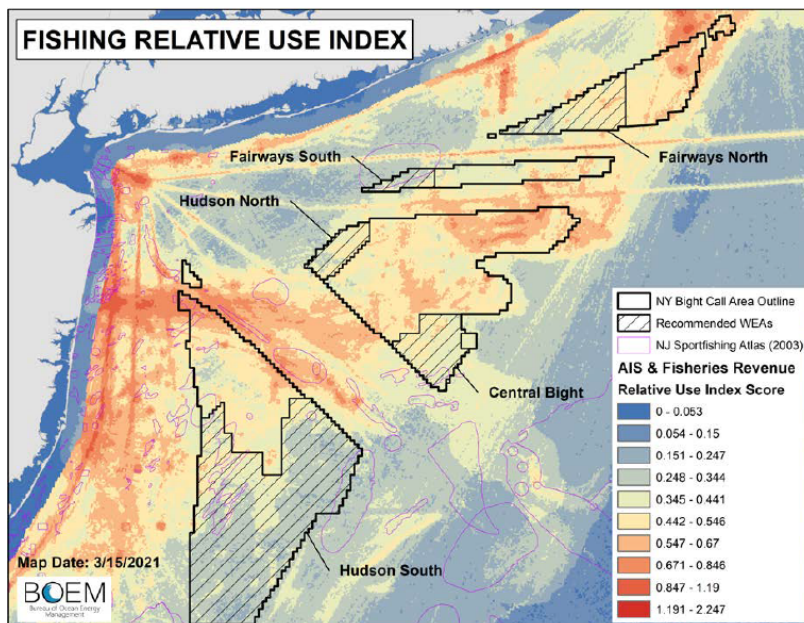
This is reinforced when considering the Fishing Relative Use Index analysis and map that are provided in BOEM’s decision memo. As explained in the memo:

“Using vessel trip report data from the NMFS for the period 2007-2015, BOEM identified the top six FMPs [Fisheries Management Plans] by total revenue in the Call Areas for mapping their relative use. The scallop fishery is by far the highest-value fishery. BOEM is concerned, however, that a strict revenue analysis would result in recommended WEAs that disproportionately impact lower value fisheries. To address concerns from the fishing industry about this disparity in economic value, BOEM created a weighted spatial overlay of multiple factors, including conversion of the fishing revenue, adjusted to weight the relative importance of the NY Bight to that FMP.”

The map below (Figure 3) demonstrates the relative low fishing use of the final WEAs, as well as the fact that the WEAs do not appear to impede pathways to higher use fishing areas.

¹⁵ Created using data from the Northeast Ocean Data Portal, available at: <https://www.northeastoceandata.org/>

Figure 3. BOEM Fishing Relative Use Index Map



4. *Uniform 2 nm buffers between turbines and shipping lanes suggested by some commenters are not necessary and are inconsistent with the international experience.*

As RCG noted in its report for NYSERDA, “It is difficult to apply a standardized minimum distance between wind farms and navigation routes, as risks will vary depending on the location, proximity of turbines to a route boundary, prevailing metocean conditions, and existing and future vessel traffic profiles.”¹⁶ RCG notes that distances from 0.5 nm to 3.5 nm can be found to be safe under the UK Maritime and Coast Guard Agency Marine Guidance Notice 543 (MCA MGN 543)¹⁷ if the risk is reduced to a level “as low as reasonably practical” or ALARP.

According to the NYSERDA report, “the most common distance between a wind farm and shipping lane is approximately 1 nm.” Figure 30 from the NYSERDA report is reproduced below:

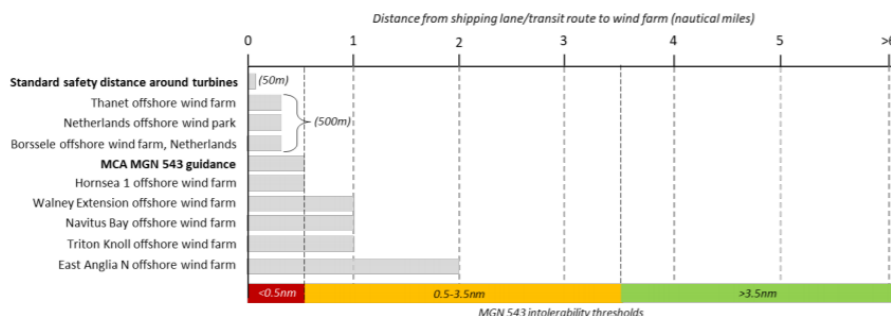
¹⁶ NYSERDA report, page 53.

¹⁷ Available at:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/502021/MGN_543.pdf

Figure 30. Minimum Distances Between Example European Offshore Wind Farms and Shipping Routes Compared with Intolerability Thresholds

Source: MCA, 2016



RCG concludes in the NYSERDA report, “This study suggests that 1 nm is an appropriate setback for initial planning purposes and informing the preliminary identification of area [sic] for potential locating of WEAs, and actual setbacks between shipping and navigation lanes and WEAs (and sites) should be determined at a later stage in the siting process following completion of a full NSRA.”¹⁸

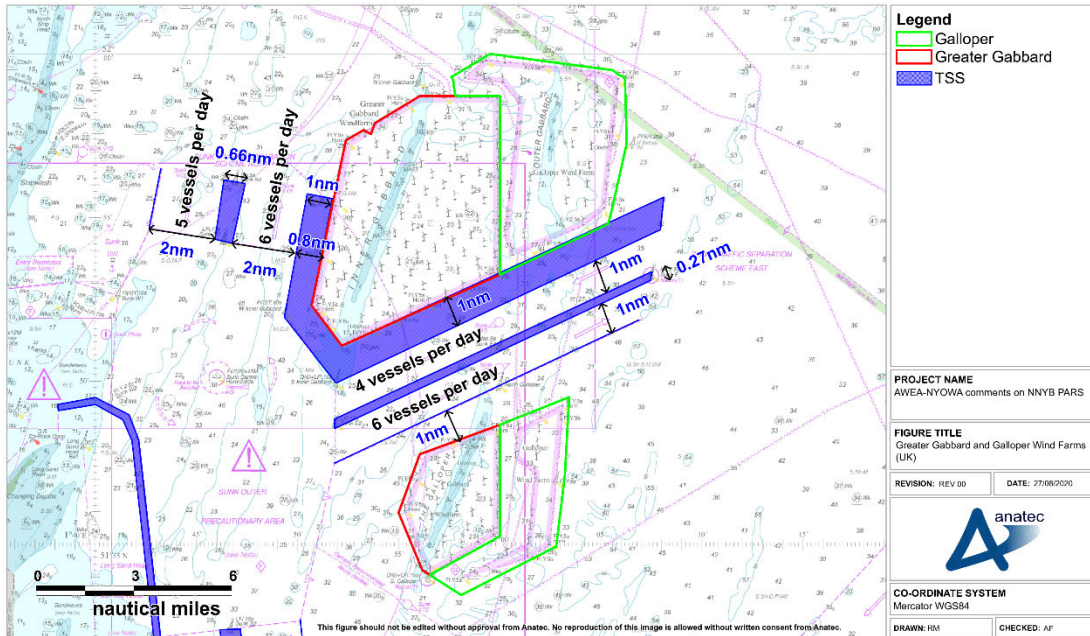
There are numerous examples of operational offshore wind farms located in proximity to busy routing measures within European waters. Figure 4 presents a pertinent example, the operational Greater Gabbard and Galloper wind farms, which are located within the outer Thames Estuary in the UK. Both projects are sited 0.8 - 1nm from the neighboring Sunk Routing Measure, which comprises three TSS converging upon a central precautionary area. This represents a very similar scenario to that of the Ambrose / Nantucket, Ambrose / Hudson Canyon, and Ambrose / Barnegat TSS referenced above, which again converge upon a central precautionary area.

The Sunk Routing Measure (which includes the TSS and a precautionary area as above) was implemented as part of overarching traffic management plans in the area, and the design included consideration for proposed wind farm developments. It should also be noted that a VTS (information only) was established as part of these traffic management measures.

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¹⁸ Ibid. page 57.

Figure 4. Greater Gabbard and Galloper Wind Farms in relation to TSSs



As indicated in Figure 4, the bordering lanes are used by between four and six vessels a day based on recent marine traffic assessment of AIS data¹⁹ transmitted by the vessels. Further study of similar data¹⁹ within U.S. waters shows that multiple vessels utilizing the TSS lanes in proximity to Greater Gabbard and Galloper also transit the routing measures in the New York Bight area. As such, these vessels will be familiar with transiting near offshore wind farms while within a routing measure.

Greater Gabbard was fully commissioned in 2012, with Galloper following in 2018. To date there have been no reported incidents associated with the use of the bordering TSS lanes for vessel transit. It is noted in this regard that this is considered a busy area in terms of traffic and it is located in proximity to the Thames Estuary, which houses key ports including the Port of London and the Medway Ports of Sheerness, Chatham and Thamesport. This indicates that with effective traffic management in place, vessels can adapt to the presence of offshore wind farms without issue.

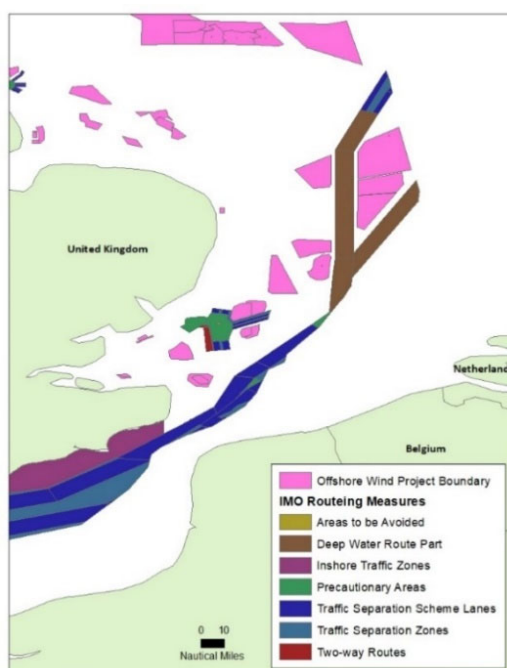
For our August 2020 comments, then-AWEA separately calculated the proximity of several UK offshore wind farms to deep water routes.²⁰ Based on those calculations, as shown in Figure 5 below, seven offshore wind lease areas in the UK have boundaries that are one nautical mile from a deep water route (Norfolk Boreas, East Anglia One North, Norfolk Vanguard East, Norfolk Vanguard West, East Anglia Three, East Anglia One). Five of those

¹⁹ In-house marine traffic data held and assessed by Anatec Ltd.

²⁰ The data used to create this map and calculations came from the following public sources: Admiralty Maritime Data Solutions: <https://datahub.admiralty.co.uk/portal/apps/sites/#/marine-data-portal>, and The Crown Estate GIS data portal: <https://opendata-thecrownestate.opendata.arcgis.com/datasets/thecrownestate::offshore-wind-site-agreements-england-wales-ni-the-crown-estate-1>

wind farms are approved, two are still pending. Further, the Humber Gateway offshore wind farm is just over 0.5 nautical miles from a traffic separation scheme. These wind farms have not created navigation hazards. Further, it is ACP and NYOWA's understanding that the largest active container vessel in the world, the HMM Algeciras, a 400m container ship, has utilized the routeing measures adjacent to the operational Greater Gabbard and Galloper wind farms. This speaks to the compatibility of even the very largest vessels navigating safely in the vicinity of offshore wind farms.

Figure 5. Proximity of sampling of UK OSW farms to deep water routes



5. *ACP and NYOWA continue to support revising the path of the proposed Cape Charles to Montauk Point tug and tow shipping fairway*

During the April 2021 New York Bight Task Force meeting, the Coast Guard acknowledged it is reconsidering the proposed Cape Charles to Montauk Point Fairway, and is analyzing options to move, reorient, and/or narrow the fairway.²¹ ACP and NYOWA support this reconsideration and, as we argued in our August 2020 comments, believe the data supports the ability to do so safely while preserving existing New York and New Jersey lease areas and the Hudson North WEA. An April 9, 2021, draft chart from the Coast Guard supports these potential fairway adjustments, which ACP and NYOWA support.²²

²¹ The Coast Guard slides are available at: <https://www.boem.gov/sites/default/files/documents/renewable-energy/state-activities/George-Detweiler-USCG.pdf> (slide 15)

²² Coast Guard chart available at: <https://homeport.uscg.mil/Lists/Content/Attachments/65940/NIPARSRoutingCharts2.pdf>

Coastal high frequency radar is a “solvable problem”

Last year, some commenters in this proceeding raised concerns about the potential impact offshore wind turbines could have on coastal high frequency (HF) radars. Among other uses, data from coastal HF radar is used to inform Coast Guard search and rescue operations. For the reasons stated below, ACP and NYOWA do not believe this “solvable problem” should influence the NNYB PARS analysis as multiple mitigation options are in development, and the radar vendor and experts ACP has consulted are confident the mitigation options will work as expected given the experience deploying similar mitigations to address interference from land-based wind with radars of varying types.

In 2018, BOEM commissioned a study by the leading developer/manufacturer of coastal HF radars to better understand the potential concerns.²³ Among the key findings of this report were, “The location of the wind turbine interference in the Doppler spectrum is predictable and can be determined from the rotation rate of the wind turbine” and “Mitigation methods that remove signals from the Doppler spectrum based on the wind turbine rotation rate estimates are effective methods of mitigating wind turbine interference.”

This was elaborated on in a webinar²⁴ hosted last year by the U.S. Department of Energy (DOE) and the Interagency Wind Turbine Radar Interference Mitigation Working Group. The panelists on this webinar, echoing the prior study, noted there are opportunities to mitigate the impacts today and additional concepts are in development. Wind turbine interference on coastal HF radars was characterized by a one of the radar experts on the panel as a “solvable problem.”

The potential mitigations discussed included:

- Tune the radar differently (i.e. change the sweep rate)
- Establish filters
 - If the radar owner/manufacturer knows turbine rotation rates and nacelle angles, they can tell exactly where in the doppler space that wind turbine interference effects will show up along with relative amplitudes and flag those returns so they are not processed
- Supplement coastal HF radar data with additional sensors attached to offshore wind turbine platforms

Given that BOEM and NOAA are collaborating in funding the development and testing of the mitigation methods and the experts who design and manufacturer coastal HF radars are confident mitigation will work, ACP and NYOWA do not believe this “solvable problem” should influence the NNYB PARS analysis.

²³ Available at: https://epis.boem.gov/final%20reports/BOEM_2018-053.pdf

²⁴ More information, including a recording of the webinar and slides that can be downloaded, are available on the DOE website at: <https://www.energy.gov/eere/wind/articles/offshore-wind-turbine-radar-interference-mitigation-webinar-series>



Conclusion

In the view of ACP and NYOWA, the final designation of the WEAs published by BOEM reinforce the evidence and arguments we presented last year that existing navigation safety measures in the New York Bight, enhanced by the Coast Guard's marine spatial planning efforts within ACPARS, NSRA procedures on the project-level, and available mitigations are sufficient to preserve navigation safety for all mariners in the New York Bight.

We also want to reiterate our request that a draft NNYB PARS report be offered for public comment, and that the Coast Guard host public meetings to discuss the contents of the draft report prior to finalizing.

Thank you for your careful consideration of the issues raised in this letter.

Sincerely,

Handwritten signature of Tom Vinson in black ink.

Tom Vinson
Vice President,
Policy & Reg Affairs
ACP

Handwritten signature of Laura Morton in black ink, set against a light gray rectangular background.

Laura Morton
Senior Director,
Offshore Wind
ACP

Handwritten signature of Joe Martens in black ink.

Joe Martens
Director
NYOWA