

September 13, 2021

Public Comment from the Pacific Merchant Shipping Association to the Bureau of Ocean Energy Management (BOEM), Office of the Environment.

Submitted by e-mail.

Re: Humboldt Wind Energy Area Environmental Assessment

The Pacific Merchant Shipping Association is a trade association representing terminal operators and ocean carriers operating in the West Coast of the United States. We are providing comments on the Humboldt Wind Energy Area Environmental Assessment.

PMSA has previously submitted comments on our concern on previous proposed projects: Docket Number: Docket Number: BOEM–2018-0045, and Docket Number: BOEM–2016–0051; MMAA104000.

While offshore wind energy is a great concept, the assessed location is problematic to the existing navigational tracks. The proposed location directly overlaps with these tracks, which have been designated to reduce the risk of oil spills, while observing the safety of navigation for all other parties involved.

The recommended tracks for coastal shipping to follow along the Pacific Coast were developed through a collaborative process with federal and state agencies at the Pacific States, British Columbia Oil Spill Task Force and documented in their [West Coast Off Shore Vessel Traffic Risk Management Project](#), developed in 2002 and reviewed in [2008](#) and [2016](#). The recommended routes place vessel traffic in conflict with the proposed project.

According to The Outer Continental Shelf Lands Act (OCSLA), any leases or easements should be carried out in a way that doesn't interfere with uses of the sea, including sea lanes, potential sites for deep water ports, or navigation. The U.S. Coast Guard has developed guidance for maintaining safe distances and separations between offshore projects and established shipping lanes and fairways. We ask that you take these concerns into consideration when deciding where to place such projects, and what measures must be taken to ensure that additional risks are not introduced.

We believe any projects in the assessed location would impose on the existing navigational tracks, and potentially increase navigational risk.

Sincerely,

Jessica Alvarenga

Jessica Alvarenga
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