



**The American Waterways Operators**

www.americanwaterways.com

**Pacific Region**

5315 22nd Avenue NW  
Seattle, WA 98107

Charles P. Costanzo  
Vice President - Pacific Region

PHONE: (206) 257-4723  
Cell: (203) 980-3051  
FAX: (866) 954-8481  
EMAIL: ccostanzo@vesselalliance.com

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RADM D. B. Abel  
U.S. Coast Guard  
Commander, Seventeenth Coast Guard District  
PO Box 25517  
Juneau, Alaska 99802-5517

Re: Comments on the Port Access Route  
Study in the Chukchi Sea, Bering  
Strait and Bering Sea  
(USCG-2014-0941)

Dear RADM Abel:

On behalf of the American Waterways Operators, the national trade association for the tugboat, towboat, and barge industry, thank you for the opportunity to comment on the Port Access Route Study (PARS) in the Chukchi Sea, Bering Strait and Bering Sea. Over a dozen AWO member companies operate towing vessels engaged in coastwise trade in the State of Alaska. These vessels play a crucial role in the regional economy by providing many Alaskan communities with fuel, food, and consumer goods and by supporting key Alaskan industries such as fishing, mining, and oil and gas exploration. These vessels provide freight transportation services and industrial support to areas where road or rail transportation is impossible, air transportation is cost prohibitive, and deep-draft vessels cannot safely transit.

These tugboat and barge operations in the proposed PARS area are seasonal, beginning in May and ending in September. Vessel operators do not generally “force ice” and often conduct ice-flyovers as a standard element of voyage planning. These vessels have unique operating profiles and must be granted operational, routing, and voyage planning flexibility. Subjecting these vessels to identical routing requirements as deep-draft vessels is unnecessary and could heighten marine safety risk and create undue hardship on the communities and industries that rely on seasonal barge service. For this to be avoided, it is essential that the scope and applicability of any vessel routing system that is put into place in the Chukchi Sea, Bering Strait and Bering Sea be defined with careful consideration to the operational profile of domestic towing vessels.

AWO recognizes the value of vessel routing systems and traffic separation schemes (TSS) in reducing the risk of marine casualties and increasing the efficiency of vessel traffic in

congested areas. AWO also endorses proactive voyage planning to ensure marine safety in the Alaskan Arctic. While AWO will not comment here on the prospective need for a traffic separation scheme in the proposed area, specific data describing total transits from 2009 to 2014 do not suggest urgent or impending problems of vessel traffic congestion through the Bering Strait. Data from the Marine Exchange of Alaska show that 262 vessels transited the Bering Strait in 2009, and in 2014, a total of 255 vessels transited the same area. The data suggest that the Coast Guard can undertake this process with careful deliberation knowing that the area is not facing an immediate congestion crisis. Indeed, domestic vessel operators continue to operate today in the same locations and in roughly the same numbers as they have in the past.

The proposed offshore traffic separation scheme could pose significant hazards and challenges for operators of towing vessels engaged in coastwise trade. These vessels sail at roughly half the speed of typical deep-draft vessel traffic and call at coastal ports where typical deep-draft vessels do not. Also, seasonality and dynamic weather concerns demand routing flexibility to develop and execute safe voyage plans. For many of these voyages, the safest route often falls outside of the proposed vessel routing system. Compliance with the proposed traffic separation scheme could:

- a) restrict the ability of these vessels to choose the safest and most efficient routes through the area;
- b) force coastwise vessel traffic into traffic lanes with faster-moving deep-draft traffic; or
- c) drive coastwise vessel traffic farther offshore, greatly increasing sailing times and distance from safety and response resources.

**As a result, AWO recommends that towing vessels and other vessels of less than 300 GRT engaged in domestic freight transportation be exempted from the proposed PARS and that any proposed Areas to be Avoided (ATBAs) consider the importance of the many safe and established tug and barge routes along the Alaskan coastline.**

We welcome further discussion on the development of a vessel routing system in the Chukchi Sea, Bering Strait, and Bering Sea Code and ask that the Coast Guard consult with and draw on the expertise of AWO's Arctic Navigation work group and Pacific Region Quality Steering Committee as this important work moves forward.

Please feel free to contact me should you have any questions.

Sincerely,



Charles P. Costanzo