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Brian W. Vahey  
Senior Manager – Atlantic Region

January 27, 2020

Mr. Jerry Barnes  
U.S. Coast Guard Fifth District  
431 Crawford Street  
Portsmouth, Virginia 23704

Re: Port Access Route Study:  
Approaches to the Chesapeake  
Bay, Virginia (USCG-2019-0862)

Dear Mr. Barnes:

The American Waterways Operators is the national trade association for the U.S. tugboat, towboat and barge industry. Our industry is the largest segment of the nation's 40,000-vessel domestic fleet and moves more than 760 million tons of cargo each year safely and efficiently. This includes more than 80 percent of New England's home heating oil, 60 percent of U.S. export grain, and significant bulk commodities imported into and exported from Mid-Atlantic states. On behalf of our over 300 AWO member companies, thank you for the opportunity to comment on the Port Access Route Study: Approaches to the Chesapeake Bay, Virginia.

AWO members are committed to the goal of zero harm from our industry's operations – to human life, to the environment, and to property. We believe it is critical that the construction of offshore wind farms, drilling platforms, and other structures does not create navigational safety hazards that put vessels and their crews at risk or obstruct the movement of goods on which the nation's economy depends. It is with these concerns in mind that we worked closely with the U.S. Coast Guard and other stakeholders to provide towing vessel navigation information to inform the development of the Atlantic Coast Port Access Route Study (ACPARS). That study, finalized in 2017, recommended the creation of a safety fairway for towing vessels. We strongly support this recommendation and have urged the Coast Guard to finalize the fairway proposal.

As the Coast Guard begins the second phase of the ACPARS process by considering approaches into and out of port areas, it is imperative that the agency keep in mind the intersection between sea lanes and the traditional towing vessel navigation routes identified in ACPARS. Most towing vessels do not connect with sea lanes far offshore, as large oceangoing

ships do. Instead, towing vessels connect with port area approaches from coastal navigation routes much closer to the coast.

Looking at Chesapeake Bay specifically, the existing northeast and southeast traffic lanes are adequate to accommodate the types and amounts of vessel traffic operating in the Mid-Atlantic. These existing sea lanes and the traditional towing vessel navigation routes are well established and have intersected for decades with little to no conflict. Where congestion occurs, waterways users will continue to follow the Rules of the Road to ensure safe passage. AWO members strongly urge the Coast Guard to protect these traditional routes by establishing an Atlantic Coast Fairway consistent with the recommendations of ACPARS.

Without an established fairway, the proliferation of offshore wind development will pose an increasing risk to safe vessel navigation along the Atlantic Coast. Should developers expand wind projects to intersect with and encumber traditional navigation lanes, navigation patterns will be forced to change in ways that we cannot predict now. Until the Coast Guard implements the recommendations of the first ACPARS, it is impossible to provide reliable information for the second study. However, if the Coast Guard establishes the recommended Atlantic Coast Fairway, we believe the existing traffic lanes leading into and out of the Chesapeake Bay will continue to serve the safe operations of towing vessels. Establishing that fairway should be the Coast Guard's top navigation priority for this region.

Thank you for the opportunity to provide comments on this important subject. We would be pleased to answer any questions or provide further information as the Coast Guard sees fit.

Sincerely,

A handwritten signature in cursive script that reads "Brian W. Vahey". The ink is dark and the signature is written in a fluid, connected style.

Brian W. Vahey  
Senior Manager – Atlantic Region