



755 Winslow Way East
Suite 105B
Bainbridge Island, WA 98110

PHONE: 203.980.3051
EMAIL: ccostanzo@americanwaterways.com

Charles P. Costanzo
General Counsel & Vice President – Pacific Region

June 30, 2021

LTJG Katie Matha
U. S. Coast Guard Thirteenth District (dpw)
915 Second Ave.
Seattle, WA 98174-1067

RE: Waterways Analysis and
Management System Study of the
Columbia River Entrance

Dear LTJG Matha:

The American Waterways Operators is the national trade association for the tugboat, towboat, and barge industry. AWO's member companies own and operate towing vessels operating on the U.S. inland and intracoastal waterways; the Atlantic, Pacific, and Gulf coasts; and the Great Lakes. Our industry's 5,500 towing vessels and 31,000 barges comprise the largest segment of the U.S.-flag domestic fleet. The tugboat, towboat, and barge industry provides family-wage jobs and ladders of career opportunity for more than 50,000 Americans, including 38,000 positions as mariners on board our vessels, and supports more than 300,000 jobs in related industries nationwide. Each year, our vessels safely, securely, and efficiently move more than 760 million tons of cargo critical to the U.S. economy, including petroleum products, chemicals, coal, agricultural products, minerals, steel, aggregates, and containers. Tugboats also provide essential services in our nation's ports and harbors, including shipdocking, tanker escort, and bunkering.

Twenty-one billion dollars of agricultural products are exported from the Columbia Snake River System (CSRS) each year. It is the number one gateway for U.S. wheat exports and the number two gateway for corn and soy exports. It is also the most important waterway for West Coast wood and mineral exports and a critical hub for automobile imports and exports.

The aids to navigation (AtoNs) at the Columbia River Entrance are key to safe commercial navigation. It is imperative that any plans to alter AtoNs in this area optimize marine safety and mariner situational awareness. Keeping this vital trade gateway open to safe navigation is also critical to the economy of the region and the nation.

Our industry views physical AtoNs as essential to safe navigation. Recently, the Coast Guard-AWO Safety Partnership's Mid-America Regional Quality Steering Committee (RQSC) finalized the Western Rivers AtoN Quality Action Team (QAT) report. The QAT conducted a baseline assessment of floating AtoNs with experienced licensed mariners, Coast Guard Sector commanders, and the commanding officers of buoy tenders. The report concluded that "electronic navigation aids are not sufficient to replace physical aids on the vast majority of the Western Rivers" and that "mariners' ability to 'read' the river facilitated by the physical buoys is critical to safe navigation." Recognizing that the conditions on the Western Rivers and the CSRS are different, the conclusion from a safety perspective remains the same: electronic aids "should be viewed as a supplement to augment floating buoys and not a replacement."

The current AtoN configuration at the CSRS entrance serves the needs of the towing industry well today. It is critical that the Coast Guard also consider the future needs of traffic at the entrance of the CSRS. Petroleum and agricultural cargo volumes on the CSRS, for instance, are expected to increase, impacting traffic at the CSRS entrance. If vessel traffic continues to increase, there may be a need for more physical AtoNs. The placement of physical AtoNs at the CSRS entrance does and must continue to provide safety and economic benefits to the region and the nation.

Thank you for the opportunity to comment on the WAMS process. Please let me know if I can offer additional information to support our mutual goal of ensuring the continued safe operation of commercial vessels on the CSRS.

Sincerely,



Charles. P. Costanzo
General Counsel & Vice President – Pacific Region