



999 N. Northlake Way  
Suite 223  
Seattle, WA 98103

PHONE: 206.406.3922  
EMAIL: [pschrappen@americanwaterways.com](mailto:pschrappen@americanwaterways.com)

Peter J. Schrappen, CAE  
Vice President – Pacific Region

November 8, 2022

LCDR Sara Conrad  
Pacific Area (PAC-54)  
U.S. Coast Guard  
1800 Dennison Street  
Alameda, CA 94501

Re: Port Access Route Study: The  
Pacific Coast From Washington to  
California (USCG-2021-0345)

Dear LCDR Conrad:

On behalf of the American Waterways Operators (AWO), thank you for the opportunity to comment on the U.S. Coast Guard (USCG)'s draft Pacific Coast Port Access Route Study (PACPARS).

AWO is the tugboat, towboat, and barge industry's advocate, resource, and united voice for safe, sustainable, and efficient transportation on America's waterways, oceans, and coasts. Our industry safely and efficiently moves over 665 million tons of cargo each year, including more than 60% of U.S. export grain and significant bulk and containerized cargoes transported along the Pacific Coast. These vessels emit significantly less greenhouse gasses than other modes – rail emits 43% more and trucks emit 832% more – while also reducing traffic congestion and improving public safety.

As leaders in maritime safety, security, and environmental stewardship, AWO members work with government partners to advance our shared objectives. Our commitment to sustainability includes aiding the development of renewable energy, including wind energy. At the same time, such projects must not become navigational hazards that jeopardize mariners' and vessels' safety. AWO looks forward to continuing to work with the USCG, Bureau of Ocean Energy Management (BOEM), other government stakeholders, and industry partners to minimize the safety risks posed by offshore structures. To that end, we generally support the fairways proposed in this study, applaud the speed with which the draft was completed, and suggest a couple of improvements. Establishing adequate nearshore and offshore safety fairways of sufficient width is necessary to ensure navigation safety and preserve the efficiency of this low-carbon transportation mode into the future.

AWO appreciates the efficiency with which the draft PACPARS was produced. Other federal agencies are moving ahead with plans to develop ocean areas. These competing interests could threaten navigational safety if leases are issued without established fairways. The draft

PACPARS reflects the Coast Guard's awareness of this time pressure; this sense of urgency should continue as the PACPARS rulemaking process moves forward.

We encourage the USCG to ensure that all stakeholders are heard through open and honest collaboration, and their views integrated into the rulemaking. Participants must include industry stakeholders, BOEM, National Marine Fisheries Service, Department of Defense, and others who have interests on ocean space along the Pacific Coast. Balancing plans and timelines will be impossible without good communication and collaboration.

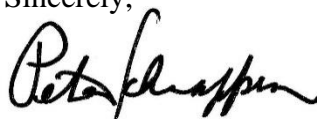
AWO requests the following improvements to address lingering concerns of tugboat and barge operators. The hard 90-degree turn depicted in the fairway scheme to enter the Columbia River from the offshore fairway is not practical for some smaller vessels, tugboats and barges. In heavy weather, depending on the approach course, a series of smaller turns over a greater distance would give these vessels more options to ensure safety and lessen exposure to adverse wind, wave and swell patterns. We recommend softening that turn from a "T" to a triangular intersection to ease this approach from both the north and the south.

Additionally, because many vessels operate 50 nautical miles from shore along the Pacific Coast, we ask that a fairway be established seaward of a line that is 50 nautical miles from the nearest land inclusive of any near coastal islands. The practice of transiting at this distance was originally coordinated by the Western States Petroleum Association and adopted as a voluntary measure by shipping companies participating in the TAPS tanker trade carrying Alaska crude oil between Valdez, Alaska and ports in Puget Sound, San Francisco Bay, and Los Angeles/Long Beach. Establishing a fairway that reflects this currently voluntary measure would recognize the long-time success of this initiative. We recognize that it is unlikely that wind energy areas (for use with floating wind turbines) would be leased in such deep waters with current technology. However, establishing a fairway to facilitate safe transit by vessels operating at that distance from shore would be prudent to avoid future conflicts.

AWO is confident that offshore wind, aquaculture, and other interests can be managed to coexist safely with commercial navigation with careful planning, good communication, and attention to mariner and vessel safety. The establishment of well-sited and adequately sized navigation safety fairways is an important step toward that end.

Thank you for the opportunity to comment on this issue. AWO would gladly answer any questions or provide further information as USCG sees fit. Our 78-year history speaks to our commitment to safe and efficient operation of towing vessels and barges throughout the nation's waterways.

Sincerely,

A handwritten signature in black ink, appearing to read "Peter Schrapen". The signature is fluid and cursive, with a large initial "P".

Peter Schrapen

Vice President – Pacific Region