



801 North Quincy Street
Suite 500
Arlington, VA 22203

PHONE: 703.841.9300
EMAIL: bvahey@americanwaterways.com

Brian W. Vahey
Vice President – Atlantic Region

June 22, 2026

Ms. Maureen Kallgren
Office of Navigation Standards
U.S. Coast Guard
2703 Martin Luther King Jr. Ave SE
Washington, DC 20032

Re: Shipping Safety Fairways Along
the Atlantic Coast (USCG-2019-
0279)

Dear Ms. Kallgren:

The American Waterways Operators 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. As the largest segment of the nation's 45,000-vessel domestic maritime fleet, our industry is vital to America's supply chain and national security, moving the nation's commerce on U.S. inland and intracoastal waterways, the Atlantic, Pacific and Gulf Coasts, and the Great Lakes. On behalf of AWO's more than 300 member companies, we appreciate the opportunity to submit additional comments on the Notice of Proposed Rulemaking (NPRM) for shipping safety fairways along the Atlantic Coast.

AWO members lead the transportation industry in safety, security, and environmental sustainability. We remain committed to working with federal and state agencies to advance these shared objectives. As new uses of America's waterways are developed, it is essential that such projects do not produce navigational hazards that put vessels and their crews at risk or obstruct the movement of commodities on which the nation's economy depends. It is with these concerns in mind that we have worked closely with the U.S. Coast Guard during the development of shipping safety fairways and with the Bureau of Ocean Energy Management on the siting of wind energy development areas. The fairways proposed in this rulemaking represent several years of work and significant collaboration between the Coast Guard, the towing industry, and other maritime stakeholders. These fairways are a necessary step toward preserving safe navigation routes and should be finalized by the statutory deadline of December 18, 2026 to ensure that the maritime industry can continue to safely and efficiently operate as a vital link in the American supply chain.

In our previous comments on this NPRM, we emphasized the necessity of establishing 9 nautical-mile-wide fairways, highlighted areas where inadequate fairway widths would pose a hazard to navigation safety, and suggested alterations to the proposed fairways to address these safety concerns. As offshore wind development expands, and as interest in other emerging ocean uses such as aquaculture, energy and mineral extraction, and floating data centers continues to grow, sea space not protected by a fairway will be a candidate for development and potentially pose risks to safe navigation. While reaffirming our prior comments, we offer these supplemental comments to highlight the areas where we believe safe navigation routes are most threatened, explain in more detail the basis for these threats, and offer recommendations to mitigate attendant safety risks.

The proposed fairways come close to or exceed 9 nautical miles (NM) in most areas, and the Coast Guard should maintain these widths in the final rule. However, there are three fairways approaching Delaware Bay and along the New Jersey coast that fall well short of 9 NM due to conflicts with offshore wind leases: the Cape Charles to Delaware Bay Fairway, the New Jersey to New York Connector Fairway, and the Off Delaware Bay to New Jersey Connector Fairway. Each of the fairways is only 4 to 5 NM wide, much narrower than the Coast Guard's 9-NM goal.

In reality, even these widths overstate the space that towing vessels would have to navigate once the surrounding offshore lease areas are developed. Due to shoals and undersea obstructions, these fairways are effectively halved in several areas, creating bottlenecks that would force two-way traffic into sea space less than 2 NM wide:

- Fenwick Shoal in the Cape Charles to Delaware Bay Fairway;
- Avalon Shoal at the juncture of the New Jersey to New York Connector and Off Delaware Bay to New Jersey Connector fairways;
- Area near the Buoy 2FB in the Off Delaware Bay to New Jersey Connector Fairway; and
- Brigantine Shoal and the shipwreck at Buoy WR2 in the New Jersey to New York Connector Fairway.

These shoals and obstructions render a significant portion of the overlapping fairways unsafe for mariners to use except under ideal conditions; the water is simply too shallow. While the drafts of the vessels themselves may clear some of these areas, towing vessels pulling barges on a line must account for the depth of the towline. The weight and length of the towline determine its catenary—the downward curve of the line between the towing vessel and the barge. The catenary provides an essential function for these vessels, acting as a shock absorber between the towing vessel and the barge. This is particularly important during open-ocean transits.

During inclement weather or rough seas, a vessel operator will pay out additional line to increase the catenary and provide greater shock absorption between the boat and the barge. This catenary prevents the towline from snapping when the barge is lifted by ocean swells. This increases the depth of the catenary well beyond the drafts of the vessels (catenary estimate below the water is usually assumed to be 10% of the total length of tow wire

deployed). For double or triple-tow configurations, the required depths are greater, as each barge is connected by its own towline, and each subsequent towline must maintain sufficient catenary to avoid interfering with the barge and line ahead of it. Additionally, vessel types, cargo volumes and other operational factors will impact the depth of water needed for safe transit. Vessels forced to transit through these shallow areas would be severely restricted in the weather and operational conditions in which they could safely navigate. As a result, while the Coast Guard has proposed setting aside approximately 5 NM for navigation in these areas, the actual space available for safe navigation within the fairways is much smaller. The proposed fairways would require towing vessels to either manage these narrow navigation lanes or transit further offshore with larger ocean-going ships.

The navigation safety risks described above have significantly altered towing vessel traffic patterns along one of the busiest corridors for vessel transits and offshore wind development: the New Jersey coast. North-south towing vessel traffic in this stretch of coastline splits into effectively two transit lanes from approximately the buoy at Avalon Shoal offshore Cape May northward to the entrance of New York Harbor. The transit lane to the west of Avalon Shoal and continuing north is typically used by smaller towing vessels or towing vessels transiting light boat. The lane to the east of the shoal is used by larger vessels such as towline tugs and ATBs moving cargo, including petroleum products. These larger tug-tow configurations avoid transiting to the west of the shoaling areas, meaning that this section of the New Jersey to New York Connector Fairway would, in effect, be only about 2 NM wide for vessels under load.

During inclement weather, mariners tow their barges more than half a mile astern to increase catenary depth, as described above. Barges tend to swing wide of the vessel in this configuration. This creates an overall navigation profile much larger than other vessel types and would limit the opportunities for safe transit in 2 NM of sea space. During periods of rough weather, most mariners would elect not to transit along the New Jersey coast until the sea state improved. Thus, narrow fairways pose a risk not just to navigation safety but to the efficient movement of cargo along this critical segment of the nation's coastal transportation system.

We urge the Coast Guard to expand the three fairways mentioned above to give mariners more space to safely navigate. Two of the fairways appear to have space to expand:

- The Cape Charles to Delaware Bay Fairway could be expanded to the east without conflicting with lease number OCS-A 0490; and,
- The Off Delaware Bay to New Jersey Connector Fairway could be expanded to the west between the northern edge of the Delaware Bay Fairway Anchorage and the southern edge of the New Jersey to New York Connector Fairway.

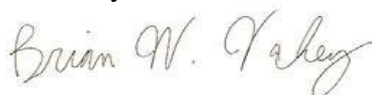
Unfortunately, expanding the New Jersey to New York Connector Fairway is a different matter. This fairway is bound on its eastern edge by offshore wind leases. We urge the Coast Guard to work with BOEM and the lease holders to investigate whether alterations to these lease areas can be made to accommodate navigation safety. If offshore wind lease holders along the New Jersey coast resume their permitting processes, the Coast Guard should ensure

that Construction and Operation Plans for wind farms constructed near the areas of concern include appropriate setbacks from the edge of the fairways to provide adequate sea space for navigation. Constructing wind turbines along the edge of the fairways in these areas would create dangerous pinch points that would severely restrict vessel traffic. We further recommend that if existing offshore wind leases in the areas of concern are given up or canceled, the Coast Guard move to expand nearby fairways to protect the sea space necessary for safe navigation from future construction.

We must expect that in the coming years, every mile of sea space that is not protected by a fairway will be open to use for other purposes. It is imperative that we preserve safe navigation lanes now before further development proceeds. The current difficulty in establishing fairways where safe navigation routes conflict with offshore wind leases makes clear how much more difficult expanding fairways will be in the years to come.

We appreciate the Coast Guard's work in developing this NPRM and the continued engagement with stakeholders throughout this process. Thank you for the opportunity to comment. We would be happy to answer any questions or provide further information as needed.

Sincerely,

A handwritten signature in cursive script that reads "Brian W. Tacey". The ink is dark and the signature is fluid and legible.

Vice President – Atlantic Region