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Brian W. Vahey
Vice President – Atlantic Region

February 13, 2023

LTJG Thomas Davis
U.S. Coast Guard - First District
408 Atlantic Ave.
Boston, MA 02110

Re: Port Access Route Study:
Approaches to Maine, New
Hampshire, and Massachusetts
(Docket No. USCG-2022-0047)

Dear Lieutenant Davis:

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 is the largest segment of the nation's 40,000-vessel domestic fleet and moves 665 million tons of cargo each year safely and efficiently. This includes 60 percent of U.S. export grain and other important bulk commodities, like home heating oil, transported in U.S. coastal waters. On behalf of AWO's more than 300 member companies, we appreciate the opportunity to comment on the Maine, New Hampshire, and Massachusetts Port Access Route Study (MNMPARS).

AWO members lead the maritime industry in safety, security, and environmental stewardship. We are committed to working with federal and state agencies to advance these shared objectives. Our commitment to environmental stewardship includes strong support for the development of alternative energy resources. However, it is critical that such projects 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 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 9 nautical mile (NM) safety fairway for towing vessels. We strongly support this recommendation and have urged the Coast Guard to finalize the fairway proposal without further delay.

We support the establishment of the six fairways proposed in the draft MNMPARS. The fairways will support the majority of current tug-barge traffic in the Gulf of Maine, and at widths which will maximize navigation safety. However, if the Gulf of Maine becomes crowded due to offshore development and if tows continue to increase in size, operators may

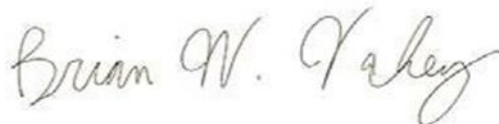
decide to cut across from Provincetown directly to the Bay of Fundy. A seventh fairway that accounts for this traffic may be necessary to future-proof safe navigation options in an increasingly congested Gulf of Maine. We also urge the Coast Guard to consider extending the width of the Massachusetts Bay Fairway to 9 NM. We understand that it is currently unlikely that wind turbines will be developed in this area given the proximity to the marine sanctuary; however, we believe it is presumptuous to assume that future technology will not allow wind developers to safely place turbines in ecologically sensitive areas. Therefore, we think it best to safeguard this space now to avoid future conflicts.

It remains imperative that the Coast Guard not allow the MNMPARS process to lag behind BOEM's lease process. There is already a potential conflict in the Gulf of Maine. On January 19, 2023, BOEM issued a Determination of No Competitive Interest for a research lease proposed by the State of Maine. This clears the way for Maine to pursue the development of a research lease that is positioned within the proposed Portland Eastern Approach Fairway. This must be deconflicted and will require expedience on the part of the Coast Guard and cooperation between the Coast Guard and BOEM. Therefore, the Coast Guard should be in regular contact with BOEM regarding this and other offshore lease areas in the Gulf of Maine. We have seen Coast Guard and BOEM coordination work effectively in other study areas, such as in the New York Bight, and would urge both agencies to follow the same process here, while ensuring that the towing industry is consulted in any navigation safety risk assessments.

In closing, AWO actively supports the development of offshore wind energy, which we view as a win-win for environmental stewardship and increased economic opportunities. We believe that the MNMPARS proposals, with the addition of our above-noted suggestions, are the best way to ensure that these objectives are met while maintaining mariner and navigation safety.

Thank you again for the opportunity to comment on this issue and for your commitment to keeping America's supply chain safe and efficient. I would be pleased to provide additional comments or further information as you see fit.

Sincerely,

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

Brian Vahey
Vice President – Atlantic Region