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Brian W. Vahey  
Vice President – Atlantic Region

February 13, 2023

LT Ryan Gilbert  
U.S. Coast Guard - Seventh District  
Brickell Plaza Federal Building  
909 SE 1st Avenue  
Miami, FL 33131-3050

Re: Southeast Atlantic Coast Port  
Access Route Study (Docket No.  
USCG-2022-27133)

Dear LT Gilbert:

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 transported in U.S. coastal waters. On behalf of AWO's more than 300 member companies, we appreciate the opportunity to comment on the Seventh Coast Guard District Southeast Atlantic Coast Port Access Route Study (PARS): Port Approaches and International Entry and Departure Transit Areas.

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 sustainability 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.

The ACPARS recommendation of 9 NM is not arbitrary. The ACPARS report states that to safely accommodate towing vessel traffic, any proposed fairway would need to be 5 NM across with the inclusion of 2 NM safety buffers on each side, for a total of 9 NM. This fairway width gives operators sufficient time to adhere to the Rules of the Road, react to a potential emergency, and accommodate traffic intersecting traditional towing vessel transit

routes, such as fishing vessels and deep-draft vessels. AWO has urged the Coast Guard to create a 9 NM-wide fairway in our comments to the 2020 Advance Notice of Proposed Rulemaking as well as in comments on supplementary Port Access Route Studies, and we urge you to adopt fairways with a total width of at least 9 NM in the Southeast Atlantic Coast to ensure continued maritime safety.

We are pleased that the consolidated PARS published last summer proposed a St. Lucie to Hatteras Fairway greater than 9 NM in width. This will be an important fairway for towing vessels transiting coastwise along the southeastern coast of the United States, and we urge the Coast Guard to codify this fairway without further delay.

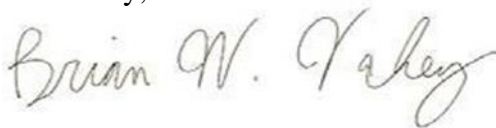
In addition to codifying the St. Lucie to Hatteras Fairway as proposed, we urge the Coast Guard to consider creating a separate, nearshore fairway for barges and towing vessels along the coasts of Florida, Georgia, and South Carolina. The St. Lucie to Hatteras Fairway is more than 30 NM offshore at points, and some towing vessels, especially tow wire vessels, navigate within 10 NM of the coast in order to avoid the gulf stream when heading southbound. To ensure safe navigation for the variety of towing vessels and barges, the Coast Guard should establish 9 NM fairways along the coast. While many of these nearshore areas are already in use by NASA or the DOD and may not accommodate future offshore development, we believe that adequate fairways must still be established in these areas to ensure continued safety.

The Inflation Reduction Act has ended the moratorium on wind development in the Southeast. Given the speed with which offshore wind leases are being developed elsewhere, it is prudent for District Seven to undertake these studies now. We have seen in other areas, such as Delaware Bay, that once BOEM has sold leases to developers, the Coast Guard's willingness to establish fairways has appeared to be significantly limited. Therefore, the Coast Guard should execute these studies as expeditiously as possible. During the entire process, the Coast Guard must be in regular contact with BOEM regarding their plans for offshore wind leases. 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.

In closing, AWO actively supports the development of offshore wind energy, which supports environmental sustainability and will stimulate increased economic opportunities. We believe keeping the proposed St. Lucie to Hatteras Fairway and considering additional nearshore fairways in the same coastal areas is 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 signature is written in dark ink and is positioned above the printed name and title.

Brian Vahey

Vice President – Atlantic Region