



801 North Quincy Street
Suite 500
Arlington, VA 22203

PHONE: 703.841.9300, Extension 251
EMAIL: bvahey@americanwaterways.com

Brian W. Vahey
Vice President – Atlantic Region

August 7, 2026

RDML Matthew Lake
Commander
U.S. Coast Guard Northeast District
408 Atlantic Avenue Boston, MA 02110

Re: Anchorages; Port of
New York (Docket No.
USCG-2026-0042)

Dear Admiral Lake:

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 plays a vital part in 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 comment on the Coast Guard's proposal to amend 33 CFR Part 110 to prohibit vessels from anchoring on the reach of the Hudson River between Yonkers, New York, and Kingston, New York, except within an anchorage established before January 1, 2021.

AWO recognizes that the Coast Guard has an obligation to publish this rulemaking to codify the provisions of Section 7327 of the Fiscal Year 2026 National Defense Authorization Act. Our comments are intended to reaffirm the importance of anchoring as a safety tool for operators and urge the Coast Guard to use its authority to facilitate the ability of vessel operators to anchor when necessary for safety.

Anchoring is a Vital Safety Tool

Anchoring on the Hudson River has been an important safety precaution for more than a century. Towing vessels routinely anchor for a few hours during periods when visibility is low and prudent navigation requires an enhanced level of safety. In 2023, the Coast Guard issued a report to Congress reaffirming the importance of anchorages in supporting safe navigation on the Hudson River. Titled "Establishing Anchorage Grounds on the Hudson River," the report emphasized what generations of mariners have known to be true: "Anchorages are an essential

part of navigational safety.” When river conditions become unsafe for navigation – for reasons of weather, ice, vessel traffic congestion, lack of available safe berthing, crew fatigue, or mechanical casualty – it is vital for the safety of the crew and for all surrounding waterways users that the captain has the discretion to anchor the vessel, out of the way of river traffic, until it is safe to proceed. This practice has served mariners and Hudson River communities for centuries, as the Coast Guard report makes clear: “The Coast Guard is not aware of any incidents [of] collisions or other marine casualties related to imprudent commercial vessel anchoring.”

Coast Guard Must Facilitate Emergency Anchoring

While prohibiting the creation of new anchorages and limiting the ability to anchor outside of the federally designated anchorage areas that currently exist on the Hudson River, the law explicitly preserves the ability for mariners to anchor as needed in the event of an emergency. The Coast Guard is proposing that vessels greater than 20 meters notify the Captain of the Port (COTP) for Sector New York when using the safety exception to anchor. This requirement will apply to the vast majority of towing vessels operating on the Hudson River. It is imperative that the Coast Guard maintain a streamlined process for anchoring notification and that the COTP trust captains to determine when anchoring is necessary for the safety of their vessel.

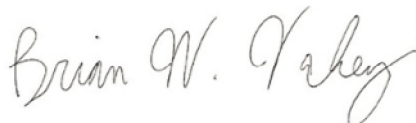
Every towing vessel captain operating a tug on the Hudson River has met Coast Guard-mandated recency requirements for 12 round-trip transits on the river, with at least one-third of those completed at night. These mariners know conditions on the river better than anyone. A Coast Guard notification process for anchoring that is inefficient or otherwise cumbersome risks disincentivizing captains from anchoring when needed and undermines navigation safety.

Anchoring will Remain an Essential Part of Hudson River Navigation

AWO has joined with towing vessel captains, pilots, and maritime association partners in supporting the creation of additional anchorages on the Hudson River. Federally designated anchorages increase navigation safety and help keep the supply chain moving. We urge the Coast Guard to work with maritime stakeholders to ensure the process for emergency anchoring is as efficient as possible to ensure the continued safety of Hudson River navigation.

Thank you again for the opportunity to comment. AWO would be pleased to provide additional information as needed.

Sincerely,

A handwritten signature in cursive script that reads "Brian W. Vahey".

Brian Vahey
Vice President – Atlantic Region