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Peter J. Schrappen, CAE
Vice President – Pacific Region

February 23, 2024

RADM Charles E. Fosse
Commander, Thirteenth District
U.S. Coast Guard
915 Second Avenue
Seattle, WA 98174

Re: Notice of proposed
rulemaking to establish
anchorage ground: Crims Island
Anchorage, Columbia River,
Oregon, and Washington
(USCG–2023–0750)

Dear RADM Fosse:

The American Waterway Operators (AWO) is the tugboat, towboat, and barge industry's advocate, resource, and unified voice for safe, sustainable, and efficient transportation on America's waterways, oceans, and coasts. Our industry is the largest segment of the nation's domestic maritime fleet, supporting over 270,000 jobs and moving 665 million tons of cargo each year safely and efficiently. On behalf of AWO's more than 300 member companies, we thank you for the opportunity to comment on the Coast Guard's notice of proposed rulemaking to establish anchorages at Crims Island on the Columbia River.

AWO recommends that the Coast Guard establish the Crims Island anchorage grounds. Rice Island has been used as an informal anchorage since 2016, and its official designation will improve safety and efficiency on the Columbia River. Specifically, the anchorage grounds' wide lower end allows for the anchorage of ballast ships, and its deep upper end allows for the anchorage of loaded vessels. Its depth supplies a critical deep-water anchorage in the area, which is especially valuable in emergencies. In addition, we recommend that the anchorage site have a depth of 43 feet to align with the depth of the federal channel. This would accommodate incoming vessels and facilitate deep-draft shipping on the Lower Columbia River, supporting the goals of both navigation and the efficient movement of commerce.

The Columbia River is a vital artery for U.S. trade and facilitated the transit of over 50 million tons of cargo in 2020. This waterway serves as a conduit for essential commodities such as grain, liquid and dry fertilizers, and refined petroleum products. Notably, it handles more than half of the nation's wheat, making it the world's third-largest grain export gateway. The river's 43-foot-deep draft channel is crucial to the safe and efficient movement of essential commodities. This channel also enables bulk carriers and container ships, aided by pilots and ship assist tugs, to access the Port of Vancouver and other critical inland ports. In short, vessel traffic on the Columbia River plays an indispensable role in the nation's economy.

On behalf of AWO's Pacific Region members, including Foss Maritime, Shaver Transportation, and Tidewater Barge Lines, we support the Coast Guard's proposal to establish the Crims Island anchorage, which will facilitate the safe and efficient movement of commerce on the Columbia Snake River System.

Thank you for the opportunity to comment. AWO would gladly answer any questions or provide further information as needed. AWO's 80-year history speaks to our commitment to tugboats, towboats, and barges operating safely on our nation's waterways.

Sincerely,

Peter Schrappen, CAE
Vice President – Pacific Region

A handwritten signature in black ink, appearing to read "Peter Schrappen". The signature is written in a cursive, flowing style with a large initial "P".