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Brian W. Vahey
Senior Manager – Atlantic Region

January 28, 2020

Mr. Jerry Barnes
U.S. Coast Guard Fifth District
431 Crawford Street
Portsmouth, Virginia 23704

Re: Anchorage Grounds; Delaware Bay
and Atlantic Ocean, Delaware
(USCG-2019-0822)

Dear Mr. Barnes:

The American Waterways Operators is the national trade association for the U.S. tugboat, towboat, and barge industry. Our industry is the largest segment of the nation's 40,000-vessel Jones Act fleet and moves more than 760 million tons of cargo each year safely and efficiently. This includes more than 80 percent of New England's home heating oil, 60 percent of U.S. export grain, and significant bulk commodities and containerized freight to and from the Atlantic states. On behalf of our over 300 member companies, we thank you for the opportunity to comment on the proposed rulemaking to establish new anchorage grounds in the Delaware Bay area.

AWO members care deeply about safety and the environment. For more than 25 years, AWO has had a formal partnership with the U.S. Coast Guard to address issues of safety and environmental stewardship at both the national and the regional level. In the Atlantic Region, AWO has worked with the Coast Guard through the Atlantic Region Quality Steering Committee, the regional arm of the Coast Guard-AWO Safety Partnership, to address issues such as hurricane preparedness and safe navigation around structures.

AWO member companies are an active part of the Delaware Bay maritime community. Our members move essential cargo into and out of the port area and conduct ship assist work and lightering operations. We are an active partner with the pilots and the Maritime Exchange and are members of the Mariner's Advisory Committee. Our members are deeply invested in the safety of maritime operations in the port and AWO supports the Coast Guard's proposal to create these anchorage areas. On any waterway, resiliency and flexibility are needed to accommodate different kinds of vessel traffic, and anchorages help achieve these requirements. Anchorages are also an important tool for traffic management, and the predictability they provide is important for safety, especially during inclement weather. The addition of these anchorages would improve the safety and efficiency of commercial movements in the

Delaware Bay area and ensure the safety of mariners and the public while protecting the environment.

We additionally applaud Coast Guard District 5 and Sector Delaware Bay for the leadership role they have taken through this rulemaking to anticipate the impact offshore wind energy could have on vessel traffic. AWO supports offshore wind development but is concerned that without careful planning, the placement of wind farms will have a negative impact on navigation safety. We continue to believe that the most urgent next step is for Coast Guard Headquarters to publish its proposal to establish an Atlantic Region fairway consistent with the recommendations of the Atlantic Coast Port Access Route Study, but it is also important that the Coast Guard is empowered at the District and Sector levels to take the steps necessary to address the specific safety needs of the local maritime community.

AWO strongly supports this anchorage proposal and urges the Coast Guard to move forward with its implementation. Thank you for the opportunity to comment on this proposed rulemaking. I would be happy to answer any questions the Coast Guard has.

Sincerely,

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

Brian W. Vahey
Senior Manager – Atlantic Region