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Brian W. Vahey
Director – Atlantic Region

May 16, 2022

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:

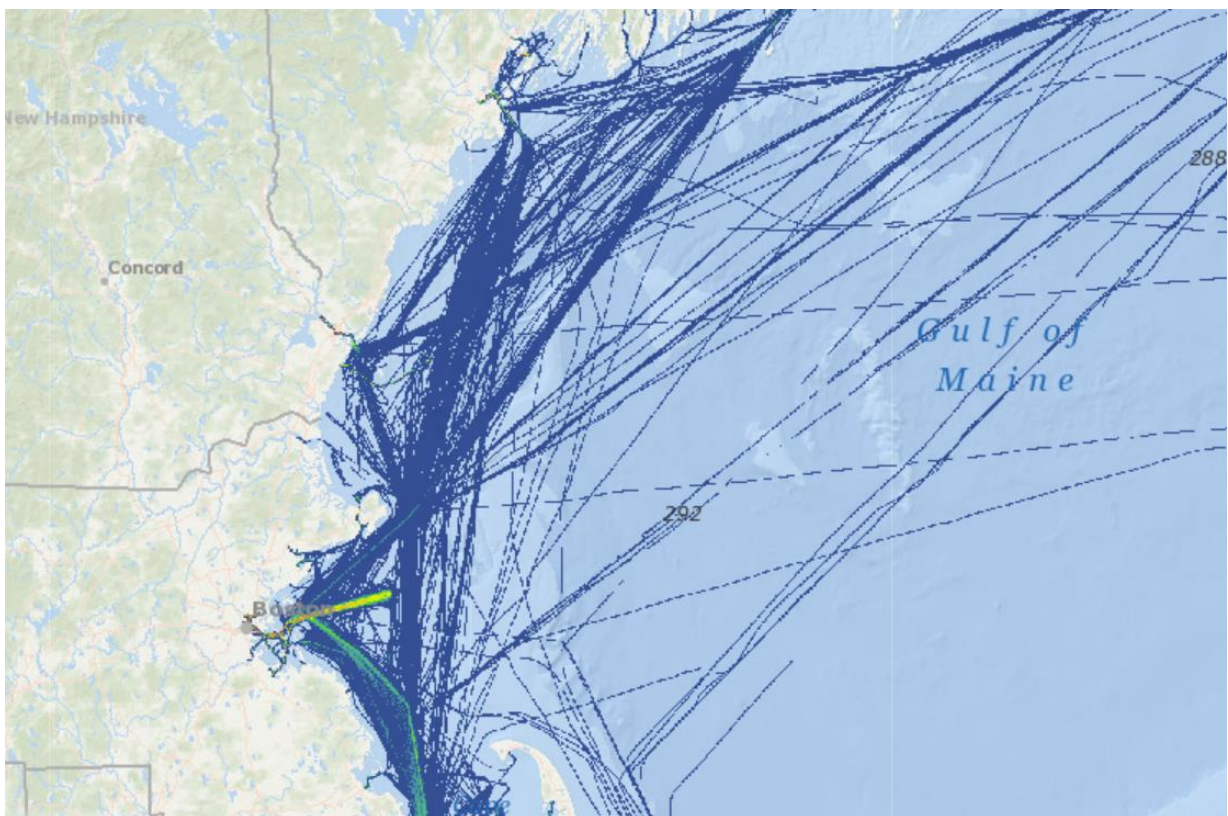
AWO is the tugboat, towboat, and barge industry's advocate, resource, and united voice for safe, sustainable, and efficient transportation on America's waterways, oceans, and coasts. Our industry is the largest segment of the nation's 40,000-vessel Jones Act fleet and moves 665 million tons of cargo 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 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 do 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 as soon as possible.

The ACPARS recommendation of 9 NM is vitally important for maritime navigation safety. 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 time to adhere to the Rules of the Road, time to react to a potential emergency, and time to 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 on the 2020 Advance Notice of Proposed Rulemaking as well as in comments on Port Access Route Studies conducted for offshore New York, Delaware Bay, Chesapeake Bay, and North Carolina areas. A 9 NM-wide towing vessel fairway is needed in the MNMPARS study area as well.

Towing vessels regularly transit offshore Massachusetts, New Hampshire, and Maine, including in the Gulf of Maine. The most typical route for both topline vessels and ATBs is to transit through the Cape Cod Canal into Boston or directly north to Portsmouth, Portland, and Penobscot; or to transit even further north through the Gulf to Canadian ports. New England's coastal geography makes it inefficient for towing vessels to hug the coastline as closely as they do in most other portions of the Atlantic seaboard, and towing vessel operators follow a more complicated variety of transit routes depending on their port of call.



Whether vessels are transiting along the coast, into and out of the ports, or cutting across the Gulf, these traditional routes should be preserved for the sake of navigation safety. We believe the Coast Guard should establish 9 NM-wide fairways to protect these traditional routes and ensure that they remain free of wind turbines and any other such obstructions offshore New England. We recognize that the variety of traditional transit routes in this area makes identifying the right location for fairways difficult, and the industry stands ready to assist the Coast Guard on this important question as the MNMPARS gets underway. While there is less

coastwise vessel traffic in New England waters than in other portions of the Atlantic, it is just as important that both the safety and the efficiency of traditional transit routes is maintained as competition for offshore space increases.

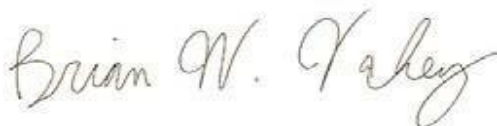
Additionally, it is important for vessel operators to understand the potential impacts of floating turbines, since the deep waters of the Gulf of Maine will require floating rather than fixed turbines in much if not all of this study area. On the one hand, it is easy to imagine how floating turbines, theoretically not limited in their placement by the geography of the ocean floor, could give developers more flexibility to site the turbines out of traditional transit lanes; but on the other hand, any turbine movement could conceivably complicate navigation around the turbines. We urge the Coast Guard to account for these potentialities in this PARS.

Lastly, it is imperative that the Coast Guard not allow BOEM's lease process to get ahead of the MNMPARS process. We have seen in areas to the south, such as Delaware Bay, that once BOEM has sold leases to developers, the Coast Guard's ability to establish fairways is significantly limited. Therefore, the Coast Guard should be in regular contact with BOEM regarding 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.

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 a 9 NM safety fairway 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 below the "Sincerely," text.

Brian Vahey
Director – Atlantic Region