The American Waterways Operators

47 Patricia Drive
Covington, LA 70433

PHONE: 985.222.5230
EMAIL: mwright@americanwaterways.com

Mark A. Wright
Vice President – Southern Region

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LT David Lieberman
Office of Navigation Systems
U.S. Coast Guard
2703 Martin Luther King Jr. Ave. SE
Washington, D.C. 20593

RE: U.S. Coast Guard's Shallow Draft Waterways Analysis and Management System Study

Dear LT Lieberman:

The American Waterways Operators is the national trade association for the tugboat, towboat, and barge industry. AWO's member companies own and operate barges and towing vessels operating on the U.S. inland and intracoastal waterways; the Atlantic, Pacific, and Gulf coasts; and the Great Lakes. Our industry's 5,500 towing vessels and 31,000 barges comprise the largest segment of the U.S.-flag domestic fleet. The tugboat, towboat, and barge industry provides family-wage jobs and ladders of career opportunity for more than 50,000 Americans, including 38,000 positions as mariners on board our vessels, and supports more than 300,000 jobs in related industries nationwide. Each year, our vessels safely, securely, and efficiently move more than 760 million tons of cargo critical to the U.S. economy, including petroleum products, chemicals, coal, grain, steel, aggregates, and containers. Tugboats also provide essential services in our nation's ports and harbors, including shipdocking, tanker escort and bunkering.

AWO appreciates the opportunity to provide comments related to the Coast Guard's Shallow Draft Waterways Analysis and Management System (WAMS). AWO members in most, if not all, nine districts operate in shallow water, defined in the Coast Guard blog as less than 12-foot depth. Of course, many waterways may be less than 12-feet deep intermittently.

The towing industry understands that other maritime stakeholders are an important part of the Coast Guard's mission and that safe interaction on the nation's waterways is a shared goal. AWO previously collaborated with the Coast Guard to develop "Life Lines," a brochure that educates recreational boaters about safe interaction with towing vessels

and barges on the water. Among the important details, the brochure highlights the importance of recognizing the pilot's line of sight; the deceptive nature of a vessel's slow speed; the need for barges and towing vessels to stay in the navigation channel; and the danger of "wheel wash." We have attached a pdf copy of the brochure in the appendix for your review. It is a helpful document when considering the many varied dynamics of safety between recreational and commercial navigation.

In general, many commercially navigable waterways are Congressionally authorized between 9- and 12-foot depths. For example, towing vessels on the Gulf Intracoastal Waterway require 9-foot depth while those on the Lower Mississippi River typically have at least a 12-foot depth.

AWO has a long history of working with the Coast Guard to determine the appropriate balance between physical and electronic Aids to Navigation (AtoNs) on the inland waterways. In October 2013, the Coast Guard-AWO Safety Partnership's Mid-America Regional Quality Steering Committee (RQSC) established a Western Rivers AtoN Efficiency Quality Action Team (QAT) which evaluated and considered future changes to AtoN delivery and service in the Eighth and Ninth Coast Guard districts. **The report explicitly concluded that navigation on the inland waterways cannot be conducted safely without physical AtoNs.** We have included a copy of this report as an appendix to this letter. We recommend utilizing the three RQSCs (Atlantic, Pacific, and Mid-America) for future discussion and deliberation about AtoNs. The report's important conclusions include:

- Marking the commercial navigation channel with properly placed physical AtoNs is critical to ensuring safe and efficient navigation.

- Buoys and other floating AtoNs, especially in bends, provide real-time environmental data such as current speed and direction. Professional mariners view these AtoNs as critical to maneuvering under constantly changing river conditions.

- Fixed structures at the entrance and exits to river bends provide mariners a shore reference for steering and flanking.

- Crossing marks and mile boards have lost significance with the advent of electronic charting. Given the consistent feedback from mariners that mile boards are no longer needed due to electronic charting, the QAT recommended the Coast Guard consider disestablishing mile boards on the inland river system through the regulatory process.

- There was a strong consensus that regular AtoN assessments should occur between industry operating groups and Coast Guard representatives at the Sector or MSU level.

- Industry also expressed a willingness to help Coast Guard AtoN teams evaluate vessel operations efficiencies. Industry participants questioned whether the Coast Guard's inland waterways commerce cutters were operated efficiently. Coast Guard members of the QAT explained that the districts were constrained by government required processes and procedures (such as bid laws).

The Western Rivers AtoN QAT also conducted a baseline assessment of floating AtoNs with experienced licensed mariners, Sector Commanders, and the Officers in Charge of buoy tenders. **The report concluded that "electronic navigation aids are not sufficient to replace physical aids on the vast majority of the Western Rivers" and "the mariners' ability to 'read' the river facilitated by the physical buoys is critical to safe navigation." The QAT determined that electronic aids "should be viewed as a supplement to augment floating buoys and not a replacement."**

Rivers are dynamic and ever changing with constantly shifting channels, erosion, shoaling, and scouring. As a result, the rivers are continually fluctuating with high and low water, river velocity, and ice gorging. Managing AtoNs during seasonally changing river conditions requires additional Coast Guard resources. Varying water levels and conditions occur every year, often several times. Coast Guard buoy tender placement and adjustments cannot wait until conditions return to "normal." High- and low-water events necessitate heightened focus by the industry and Coast Guard to ensure safe operation. The Mid-America RQSC also developed the Waterways Action Plan (WAP) to improve communication and collaboration during these events. The WAP triggers reaction, discussion, and a decision-making process as water levels, velocity, rate of fall, and ice conditions change.

Managing river AtoNs is inherently different than managing coastal aids. Coastal blue water ports lend themselves to stricter design criteria where buoys mark an assigned position and are intended to remain on station for several years until serviced as part of a routine maintenance cycle, whereas the brown water environment is dynamic and constantly changing. Those constant changes require buoy laydowns to be regularly adjusted based on prevailing conditions. Therefore, the Coast Guard cannot rely on strict design criteria used in disparate environments.

AWO members operating on Alaska rivers acknowledge the challenges presented by ice and cold weather in maintaining AtoNs in Alaska river environments. These members request that waterways management in the Seventeenth Coast Guard District ensure that seasonally deployed AtoNs and navigational aids are maintained in their intended

positions. AtoN needs during ice formation and movement can also be an issue on the Mississippi, Illinois, Missouri, Ohio, Hudson, and other rivers.

Thank you again for the opportunity to comment. We would be pleased to discuss these comments further or provide additional information as needed.

Sincerely,

Mark A. Wright
Vice President – Southern Region