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August 30, 2019

RADM Matthew T. Bell  
Commander, Seventeenth District  
U.S. Coast Guard  
709 W. 9<sup>th</sup> Street, Room 701  
P.O. Box 25517  
Juneau, Alaska 99802

Re: Port Access Route Study: Alaskan Arctic  
Coast (Docket No. USCG-2018-1058)

Dear Rear Admiral Bell,

On behalf of The American Waterways Operators, the national trade association for the tugboat, towboat, and barge industry, thank you for the opportunity to comment on the Alaskan Arctic Coast Port Access Route Study (AACPARS). Several AWO member companies operate towing vessels engaged in coastwise trade in the State of Alaska and in the study area specifically.

Towing vessels play a crucial role in the regional economy. The vessels provide Alaskan communities with fuel, food, and consumer goods along with supporting key Alaskan industries such as fishing, mining, and oil and gas exploration. Towing vessels are a critical freight transportation service for Alaska's economy because the towing industry can transit to areas where road or rail transportation is impossible, air transportation is cost prohibitive, and deep-draft vessels cannot safely transit.

Towing vessels operate throughout the entire study area from Cape Prince of Whales to the Canadian border. Vessels typically operate from mid-July through mid-October with key operations in Kotzebue Sound and Red Dog Mine, Point Hope, Lisburne, Point Lay, Wainwright, Utqiagvik/Barrow, Prudhoe Bay, Barter Island, and Kaktovik.

Vessel operators do not generally "force ice" and instead choose to make routing decisions dictated by ice and weather conditions, water depth, and the operational profile of specific towing operations. These vessels have unique operating profiles that make operational, routing, and voyage planning flexibility necessary for safe and efficient navigation. **Subjecting these vessels to an identical routing system as deep-draft vessels would heighten marine safety risk while creating undue hardship on the communities and industries that rely on seasonal barge service.**

Establishing a mandatory routing system could pose significant hazards and challenges for operators of towing vessels engaged in coastwise trade. Towing vessels travel at roughly half the speed of typical deep-draft vessels and call at coastal ports where typical deep-draft vessels

cannot. To ensure safe voyage plans, seasonality and dynamic weather concerns demand routing flexibility. For many of these voyages, the safest route is close to the coastline and would likely fall outside of a potential vessel routing system.

**Ultimately, a routing system that does not differentiate between towing vessels and deep-draft vessels could:**

1. Restrict the ability of towing vessels to choose the safest and most efficient routes;
2. Force towing vessel traffic into traffic lanes with faster-moving deep-draft traffic; and,
3. Drive towing vessel traffic farther offshore, greatly increasing sailing times and distance from ports or places of refuge and response resources.

**AWO recommends that any future routing systems in the study area exempt towing vessels up to 1600 GRT engaged in domestic freight transportation and that any proposed Areas to be Avoided consider the importance of safe and established tug and barge routes along the Alaskan coastline.** This tonnage threshold provides a reasonable limit to the exemption that accounts for the full towing vessel segment, including articulated tug-barges.

Additionally, AWO encourages the Coast Guard to work with other relevant federal agencies, particularly the National Oceanic and Atmospheric Administration, to pursue enhanced bathymetric data, charting information, and navigational enhancements to better support the existing ability of towing vessels to operate safely along the Arctic coastline in the following areas:

1. Peard Bay: Improvements in buoys/pilings and lights/day boards are needed to enhance navigation into the bay for use as a refuge.
2. Wainwright Lagoon: Improvements in buoys/pilings and lights/day boards are needed for navigation at the lagoon entrance. Shifting sands in the entranceway will complicate efforts to make those improvements.
3. Point Lay: The southern barrier islands provide key areas of refuge, but more charting data is needed to better-utilize them.
4. Elson Lagoon at Point Barrow: This area is a key port of refuge that could be enhanced with additional charting data. With roadway improvements to Utqiagvik, the inside lagoon could make better use of shallow draft vessels for shore landings and offloading barges. The roadway to Utqiagvik should be moved from the north side of the spit to the south side to prevent severe erosion of the road and disruption of the corridor.
5. Mary Sachs Entrance, Challenge Entrance, Newport Entrance, and pass south of Flaxman Island: These are important passes for towing vessels to transit from Beaufort Sound to areas of refuge south of the islands when weather conditions in the Beaufort Sea become dangerous or when heavy ice conditions are present above the islands. More detailed charting information would support these kinds of operations.

We welcome further discussion on the development of a vessel routing system in the Alaskan Arctic Coast and ask the Coast Guard to consult with and draw on the expertise of AWO's Arctic

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Navigation Working Group and the Coast Guard-AWO Pacific Region Quality Steering Committee as this important work moves forward.

Please feel free to contact me should you have any questions.

Sincerely,

A handwritten signature in blue ink, appearing to read "Charles P. Costanzo". The signature is stylized and cursive.

Charles P. Costanzo  
Vice President – Pacific Region