The American Waterways Operators

801 North Quincy Street
Suite 200
Arlington, VA 22203

PHONE: 703.841.9300
EMAIL: bvahey@americanwaterways.com

Brian W. Vahey
Senior Manager – Atlantic Region

March 16, 2020

RADM Andrew Tiongson
Commander
U.S. Coast Guard - First District
408 Atlantic Ave.
Boston, MA 02110

Re: Port Access Route Study in Areas Offshore Rhode Island and Massachusetts (USCG-2019-0131)

Dear Admiral Tiongson:

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 domestic 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 imported into and exported from New England states. On behalf of over 300 AWO member companies, thank you for the opportunity to comment on the draft Port Access Route Study in Areas Offshore Rhode Island and Massachusetts (MARIPARS).

We applaud Sector Southeastern New England's foresight in conducting this Port Access Route Study. While AWO members stand ready to support the construction and maintenance of Wind Energy Areas (WEAs), it is critical for the Coast Guard to ensure that the placement of turbines does not pose navigation safety risks. MARIPARS, like the Atlantic Coast Port Access Route Study (ACPARS) before it, represents essential coordination and collaboration between the Coast Guard, the U.S. Bureau of Ocean Energy Management (BOEM), navigation stakeholders, wind developers, and environmental interests. These studies provide important information about offshore activities from multiple vantage points and help the Coast Guard identify regulatory tools at its disposal to protect navigation safety, the safety of offshore structures, and the marine environment.

In comments last year, AWO noted that our members are a vital part of the New England maritime community. Towing vessel operators conduct ship assist work in New England ports and transport a variety of products to and from the northeast to destinations across the Atlantic and Gulf coasts and beyond. Professional mariners rely on accessible navigation lanes in order to account for the various factors that impact a vessel's transit route: most notably wind, current, and sea state. We also noted in our comments that the proposed WEAs offshore Massachusetts and Rhode Island have been sited in areas that do not currently conflict with towing vessel traffic. As such, AWO members have no direct concerns with any of the recommendations the Coast Guard has made in its Port Access Route Study. We appreciate the agency's diligent outreach to stakeholders to understand maritime operations in this economically and environmentally important part of America's coastline.

While the direct impact of the New England WEAs on towing vessel traffic is low, we encourage the Coast Guard to be cognizant of the residual impacts the placement of WEAs can have on the universe of vessels navigating in New England waters. Once wind farms have been constructed, large tank ships will be forced to navigate around the turbine arrays, and the potential effect this re-rerouting and consolidation of ship traffic will have on towing vessels is unknown.

AWO members do not foresee major conflicts resulting from the planned New England WEAs; however, there are still several ongoing projects that could impact navigation. The Coast Guard's concurrent work to identify common navigation routes into and out of major port areas (ACPARS 2.0) stands to impact the existing intersection points between towing vessel transits and large ship transits, as does BOEM's work to establish WEAs in the New York Bight area. We urge the Coast Guard to ensure continued active engagement with the towing vessel community as these additional navigation planning projects continue.

The most effective actions the Coast Guard can take to minimize unintended navigation safety consequences along the Atlantic Coast are to implement the ACPARS recommendation to establish a towing vessel fairway and work with BOEM to ensure WEAs in the New York Bight area do not conflict with traditional vessel transit routes offshore New York. If traditional towing vessel navigation lanes remain free from obstructions, AWO is confident that residual impacts from WEA placement can be reasonably managed.

Thank you for the opportunity to provide comments on this important subject. We would be pleased to answer any questions or provide further information as needed.

Sincerely,

Brian W. Vahey
Senior Manager – Atlantic Region