

**Mariners' Advisory
Committee**
for the Bay & River Delaware

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Organized 1964

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Docket Management Facility (M-30)
U.S. Department of Transportation
West Building Ground Floor Room W12-140
1200 New Jersey Avenue, SE
Washington, DC 20590-0001

January 26, 2012

REF: Docket Number USCG-2011-0351
Atlantic Coast Port Access Route Study

The Mariners Advisory Committee for the Bay & River Delaware (MAC) is comprised of master mariners, pilots and other maritime professionals and concerns itself with safety of navigation, with particular regard to large ocean going vessels. This committee works closely with the U.S. Coast Guard, National Oceanic and Atmospheric Administration (NOAA), U.S. Army Corp of Engineers, commercial operators, and port industry personnel to recommend and promote safe navigation practices on the Delaware Bay and River, as well as the approaches to this very important waterway.

In response to the reopened AC-PARS, the MAC submits the following:

- (1) How are your ocean going vessel coastwise routes affected by seasonal or episodic weather variations?

Given the size of ocean-going ships, seasonal weather variations have little impact on coastal traffic. Episodic variations may cause ships to run farther offshore to avoid proximity to land or the Continental Shelf.

- (2) How are your near coastal tug and barge routes affected by seasonal or episodic weather variations?

Coastal tow traffic will run closer to the shore seeking a lee to avoid seas generated by westerly winds. They may run farther offshore to avoid dragging the catenary of the hawser on the bottom. Tows may delay sailing in heavy weather to avoid heavy seas altogether.

- (3) Is there a regularly scheduled recreational event that uses the near coastal waters in your area? Recreational events would include offshore fishing tournaments, offshore power boat races, offshore sailing regattas, etc.

There are sailing regattas and fishing tournaments in the Delaware and New Jersey coastal areas.

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- (4) Do you regularly transit the near coastal area on recreational/private yachts? If yes, how far offshore is your typical route? Does your route change seasonally or according to weather conditions?

The MAC does not represent recreational or private yachts.

- (5) Should coastwise routes be established along the Atlantic Seaboard similar to the "M-95" marine highway corridor designated by the Maritime Administration as part of "America's Marine Highway Program"? If yes, where should they be located?

The MAC supports the establishment of offshore traffic routes along the Atlantic Coast located so as to safely and efficiently connect the ports along the coast to allow for the unhindered and organized passage of large commercial vessels. They should be located far enough offshore as to allow for the reasonable development of wind energy areas, yet close enough to prevent excessive passage times. The offshore routes should be arranged to not add additional distances for vessels to transit to a given port, thus maintaining that port's competitive posture in the region. Inshore routes used by tow traffic should be arranged so as to allow for intra-port traffic to seek the shelter of the shore during period of heavy off shore winds yet still remain clear of wind energy areas located farther offshore.

- (6) What are the pros and cons to the Coast Guard designating coastwise fairways or traffic separation schemes (TSSs)?

A. The pros of creating an offshore traffic scheme include:

1. Codifying existing traffic patterns along the coast
2. Organizing the traffic flow in high density areas
3. Providing for safe navigation routes around obstruction areas.
4. Providing for safe navigation routes through areas that may in the future be wind energy sites.

B. The cons of creating an offshore traffic scheme include:

1. More navigation regulations in areas not currently regulated
2. Longer transit times between ports
3. Higher concentrations of vessel traffic

- (7) Could the creation of designated coastwise routes adversely impact watchstanding or other operational requirements? If so, please explain.

Given greater densities of vessel traffic in TSS lanes, watch standers may need to deal with a higher traffic management burden. This may be offset however by having the traffic organized in flow patterns.

- (8) If coastwise fairways were created, should separate fairways be created for different vessel types such as tug and barge vs. deep draft vessels?

In the Delaware-New Jersey area smaller vessel traffic can be accommodated with inshore fairways along the traditional paths. These fairways should be located inshore of proposed wind generation areas and in waters too shallow for deep draft vessels to safely navigate. A current example is the two-way traffic zone in the McCrie Shoal area at the entrance to Delaware Bay.

(9) Should there be separate lanes for vessels travelling in opposing directions?

There should be a separation zone between separate traffic lanes.

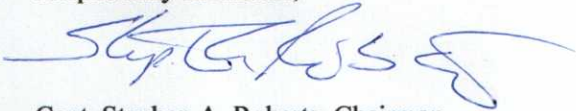
(10) Should participation in any coastwise traffic scheme be voluntary or mandatory for all or certain classes of vessels?

Participation in a coastwise TSS should match what is currently provided for in IMO regulations. Vessels are currently using TSSs in the approaches to most ports along the coast.

(11) Given the potentially long transit times, varying sea state and weather conditions; what is an appropriate width for fairways to prevent degradation to navigational safety? Are there particular areas where the width could be smaller or should be larger?

I believe that nine mile wide lanes separated by a two mile wide separation zone for a total of 20 miles would be appropriate. TSSs could be smaller in areas of restricted navigation.

Respectfully submitted,



Capt. Stephen A. Roberts, Chairman
Mainers Advisory Committee