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Mr. Richard Edwing/Mr. Michael Michalski
National Oceanic and Atmospheric Administration
1305 East West Highway
Silver Spring, Maryland 20910-3281
August 1, 2018

Dear Mr. Edwing and Mr. Michalski,

It was a pleasure to meet you both this spring at the MARACOOS annual meeting in Annapolis. As chairman of the Mariners' Advisory Committee, which is the Harbor Safety Committee for the Delaware Bay and River, I write on behalf of our members and port partners who seek NOAA PORTS installation of an air gap sensor on the Interstate 95 Bridge at Girard Point on the Schuylkill River. The 135' air gap of the Girard Point Bridge is very close to the air draft of vessels that are calling on the Girard Point terminal, which is located upriver of the bridge and is owned by Philadelphia Energy Solutions.

Wilmington Tug, which supplies tug boats for docking assistance at Girard Point Terminal, as well as the Docking Pilots who handle the vessels in the Schuylkill River bound for Girard Point has mentioned that:

- The average size of the ships transiting the Schuylkill River are increasing; and
- Due to shoaling on the Schuylkill River the ships cannot take on as much ballast to reduce their air draft significantly below 135'.
- The water levels on the Schuylkill River can vary significantly, particularly after heavy rains or strong northeasterly winds. Having a way to confirm the actual real-time air gap at the Girard Point Bridge is very important.

Philadelphia Energy Solutions, the terminal operator, explains that due to shoaling in the Schuylkill, they are bringing in larger vessels to allow the terminal to load similar amounts of cargo at a smaller draft. The larger vessels, in turn, have a higher mast height and corresponding air draft reducing the margin of error for clearance under the Girard Point Bridge. These vessels must transit at high water to maximize under keel clearance. They too, note that water levels in the Schuylkill fluctuate considerably after heavy rains and severe weather events, making that actual clearance (air gap) on any given day much harder to predict.

The Interstate 95 bridge is a very heavily travelled thoroughfare and to help ensure a safe operating environment for both the driving public and the maritime community, installation of a real-time air gap sensor on the bridge would be an investment in both public safety, environmental safety, as well as ensuring the efficiency of our nation's maritime commerce.

The Mariners' Advisory Committee looks forward to working with NOAA to implement such a sensor and welcomes any further questions on the topic. Please let us know what we can do to help move this initiative forward.

Respectfully submitted,

J. Stuart Griffin

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