Mariners' Advisory Committee

for the Bay & River Delaware

Captain Stephen Roberts , Chairman Captain H. Hickman Rowland Jr., Secretary



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August 2, 2011

Comments on Docket No. USCG-2011-0351 Atlantic Coast Port Access Route Study (ACPARS)

The Mariners' Advisory Committee for the Bay and River Delaware (hereinafter "MAC") is an organization whose members are Masters, Pilots, Tug Operators, Terminal Operators, personnel from United States Coast Guard, NOAA, Corp of Engineers and many other maritime professionals. MAC was formed in 1964 to promote the safe navigation of all commercial vessels within, and approaching, the Delaware Bay and River.

Various permitting proposals for the construction of wind farms or other types of offshore energy and related structures (hereinafter "Energy Structures") to be placed at many offshore locations have been discussed at MAC's general and special meetings over the past few years. Proposals for the Maryland and Delaware Energy Structure areas are in close proximity to the Maryland, Delaware and New Jersey coast and approaches to the Delaware River and Bay. As MAC's chartered purpose is to promote safe navigation, the members of MAC have great concern about the future ability of vessels that regularly transit these areas to safely navigate in the vicinity of the proposed Energy Structures areas.

MAC, therefore, recommends the following safety fairwarys/routing measures be employed for the safety of vessels navigating along the Maryland, Delaware and New Jersey coast and approaches into the Delaware Bay. These recommendations are being provided to ensure that the expected development of Energy Structures does not impede, or negatively impact, the safe navigation of vessels that regularly travel along the coast of Maryland, Delaware and New Jersey or make entrance into the Delaware Bay and River.

1. Tug and Barge Safety Fairway

Tug and Barge Safety Fairway - Delaware Bay to New York Harbor

A Safety Fairway starting at the end of the existing Two Way Route leading in and out of the Delaware Bay to/from the North, commonly referred to as "Tug Boat Alley", and generally following the outermost charted buoys northward and terminating at the New York Harbor Precautionary Area.

Tug and Barge Safety Fairway - Delaware Bay to Chesapeake Bay

A Safety Fairway between Delaware Bay and Chesapeake Bay starting just inside the Hen and Chickens Shoal buoy "1HC" which is located at the Precautionary Area at the entrance of Delaware Bay and following the outermost charted buoys southward along the coast of Delaware, Maryland and Virginia to the entrance of Chesapeake Bay.

These Safety Fairways would identify and preserve the current inshore routes utilized by tug and barge traffic. Absent placement of these Safety Fairways, future development of the inshore route will be likely. Tug and barge traffic would necessarily be caused to travel further offshore, thereby significantly increasing the fuel consumption, vessel emissions and cost of each voyage.

2. Create Two New Inshore Anchorages

Although anchorage proposals were not part of a PARS study, the MAC feels that two anchorages should be established along the sides of the existing Delaware TSS because traditional anchorage areas may not be available due to construction of wind turbine and other alternative energy structures. One of the anchorages will be located on the East side of the existing Delaware TSS, the other anchorage will be on the West of the Delaware TSS.

3. Shipping Safety Fairways

Vessels require clear fairways to safely navigate into the Bay and River Delaware, whether arriving from US coastal ports or from overseas. MAC recommends that 10 mile wide coastal "Safety Fairways" be implemented to insure that vessels can safely navigate between coastal ports of the United States or to arrive from overseas ports. The attached chartlet shows, generally, the recommended location and direction of the proposed headings of the Safety Fairways. The new Safety Fairways would provide sufficient sea room to allow for safe passage of both inbound and outbound (Two-way) commercial shipping traffic, as well as traffic transiting up and down the coast. Equally important, the Safety Fairways preserve vast amounts of the coastal waters for leasing, both inshore and offshore of the fairways.

MAC further recommends that a ½ mile buffer be identified beyond the limits of all offshore energy structures, and existing or recommended safety fairways, traffic separation schemes, precautionary areas, anchorages and recommended tracks. This additional buffer will provide necessary sea room for vessels travelling during periods of significant weather.

Note: Additional detailed information relative to each routing measure and anchorage contained herein may be obtained by contacting MAC.

Respectfully submitted,

MAC PARS Working Group John Reynolds, Chairman

Captain Stephen A. Roberts, Chairman

Mariners Advisory Committee

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APPROACHES TO DELAWARE BAY

