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August 8, 2011

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

Re: Comments for Docket Number USCG-2011-0351  
Atlantic Coast Ports Access Route Study

The Virginia Maritime Association (VMA) represents over 400 businesses directly and indirectly engaged in the flow of waterborne commerce through the Port of Hampton Roads. As the "Voice of the Port", representing these interested parties, we offer the following comments with regard to the Atlantic Coast Port Access Route Study (ACPARS).

We understand the Coast Guard has initiated the ACPARS, in part, because of efforts to advance offshore renewable energy initiatives; such as wind energy projects. The VMA supports the development of a robust offshore wind energy industry in Virginia which will complement and diversify Virginia's already robust maritime industry. A strong wind industry will attract additional wind related waterborne commerce through the Port of Hampton Roads and present new business opportunities for our ship repair companies and other maritime interests well suited to service this new industry. However, as we move forward with wind energy projects off the coast of Virginia great care must be exercised to ensure those projects do not conflict with the current or future needs of commercial navigation.

The Port of Hampton Roads is a critical link in our nation's supply chain, supporting domestic and international commerce. It is ranked the 3rd largest port in the U.S. for both dry bulk and container vessel calls. An economic impact study published by the College of William and Mary revealed the Port of Virginia produced or facilitated total Virginia economic activity of \$13.5 Billion in employee compensation to 345,000 Virginia employees (9% of Virginia resident employment) and in excess of \$41.1 Billion in total revenues in fiscal year 2006. With the deepest water, expanding marine terminals, and efficient roads and rail systems connecting our port to importers and exporters, the Port of Virginia is on a trajectory to become the largest port on the East Coast and will play an even more significant role in the nation's supply chain and in terms of its economic contributions.

The Hampton Roads Navigational Summit is a stakeholder's forum jointly sponsored by the VMA and the U.S. Army Corps of Engineers (USACE) to prioritize navigational projects in the Port of Hampton Roads. The Summit brings together participants from the maritime community, government, and elected office holders to work collaboratively to meet the Port's dredging requirements. At the inaugural Navigational Summit in 2006, the maritime community agreed on the following as the priority projects for the Port of Hampton Roads:

- Maintain the Norfolk Harbor Channel and Craney Island.
- Construct the Craney Island Eastern Expansion.
- Deepen the Southern Branch to the 45-foot and 40-foot authorized project level.
- Improve the South Atlantic Ocean Channel.
- Construct the 55-foot Norfolk Harbor Project.

These are the navigational needs that must be addressed and brought to reality for the Port of Hampton Roads to reach its fullest potential as a driver of economic activity. These projects are integral to the ACPARS process and the various "Priority Projects" will be referred to in the following comments.

**1. What navigational hazards do vessels operating in the study area face? Please describe.**

**Construction and operation of off-shore platforms, turbines and other structures:** The proposed Virginia Wind Energy Area (WEA) as currently defined by BOEMRE and the potential for future off-shore exploration and drilling for natural gas deposits will result in construction of wind turbine platforms and off-shore rigs. The proposed locations for these future structures should be included in the assessment or delineation of safe access routes and any potential modifications to current vessel routing measures. In addition, the associated construction and supply activities associated with wind energy development and natural gas exploration will result in increased tug and barge activity adjacent to and within the approaches to the entrance to Chesapeake Bay.

Tugs/tows often make routing decisions based on the unique circumstances of each voyage, including weather, configuration of the tow, draft, the tow wire's catenary or sag, and fuel consumption. The traditional routes of tug/tow traffic have met these demands and we would discourage any encroachment into those routes.

If the competing cargo ships, tug and barge traffic, military users, and cruise ships are funneled into defined approaches designed to route around the proposed construction areas, congestion bottlenecks may result. In addition, the various operating speeds associated with these multiple vessel types may further intensify congestion and pose navigational hazards. This anticipated increase in commercial activity also has the potential to conflict with military training and testing operations in the area.

**Natural Hazards:** At present, the navigation hazards within the study area include dynamic shoaling encroaching on the natural deep draft channels on the approaches to the entrance to the Chesapeake Bay. Since 2006 the VMA and the USACE have been evaluating offshore sea lane approaches (South Atlantic Channel) to provide for a safer and more efficient channel and buoy configuration in preparation for the expected increase in larger deep draft vessel traffic. This is the Port's South Atlantic Ocean Channel Priority Project.

**2. Are there strains on the current vessel routing systems, such as increasing traffic density associated with future growth, e.g., impact of the Panama Canal expansion project? Please describe.**

According to MARAD's Vessel Calls Snapshot 2010 report, Virginia ports were 5th in the US with 3,021 (5%) commercial vessel calls; behind Houston, New Orleans, New York & LA/LB. Combined with Navy vessel traffic and commercial vessels bound for Baltimore (10th in the nation, with 2,011 calls, 3%) more ship transits and cargo tonnage moves through the Chesapeake Bay entrance channels than any other port on the East Coast. Also, overall average vessel size increased 7% in the past five years, with containership size increasing the most at 19%. This trend is expected to accelerate with the opening of the Panama Canal in 2014.

We estimate at full capacity the Port's coal terminals would load out over 1,000 colliers annually. The Craney Island Eastward Expansion Priority Project is expected to triple container volume within the Port to over 6 million TEU's by 2025. Completing the authorized Deepening of the Southern Branch Priority Project to 45' is expected to increase the number of deep loaded bulk ships competing for deep water routes. In the foreseeable future, the VMA estimates calls by deep draft commercial ships to the Port of Hampton Roads may easily exceed 7,000 annually, with a greater proportion of these ships being wider and deeper than those currently calling the Port.

The reality of the opening of the expanded Panama Canal is the Port of Hampton Roads will move more tonnage and significantly larger ships of different classes. 24-knot container ships will be funneled into traffic lanes with 8-knot bulk ships and 14-knot LNG ships. Imagine interstate I-95 with some cars and trucks doing 30 mph and 45 mph and others doing 70. These conditions and the need to provide for safe navigation support a realignment of the Southern Approach that would reduce the existing dogleg (South Atlantic Ocean Channel Priority Project).

**3. Are modifications to existing vessel routing measures needed to address hazards and improve traffic efficiency in the study area? If so, please describe.**

The aforementioned port expansion projects, which are authorized and underway, underscore the need to proceed with the South Atlantic Ocean Channel Priority Project. Following a thorough evaluation, the offshore sea lane approaches should be improved to provide for the safest and most efficient channel and buoy configuration.

The VMA considers this modification essential to addressing current and future navigation hazards and improving traffic efficiency within the Port of Hampton Roads.

**4. What costs and benefits are associated with the measures listed as potential study recommendations? What measures do you think are most cost effective?**

The VMA supports the creation or delineation of deep draft routes into the Port of Hampton Roads. Delineation of the deep draft routes are the most cost effective means of ensuring safe navigation into the Port. At present, the current deep draft routes conflict with portions of Department of Defense Danger Zones, a USACE dredge disposal area, and the proposed WEA's off the coasts of Virginia and North Carolina. The VMA feels the deep draft routes into the Port of Hampton Roads should be delineated along the optimal naturally existing deep water routes that have been utilized by deep draft ships for decades. Further, the delineated routes must be of sufficient width to safely and efficiently handle the expected changes in the volume and size of ships calling the Port under adverse weather conditions.

The VMA is not aware of any proposed buffer zones or Regulated Navigation Areas (RNA) associated with the WEA's and strongly opposes the establishment of any RNA's that would further limit access to deep draft routes.

The VMA also supports modifying the existing traffic separation scheme associated with the current alignment. The emergence of larger vessels has led to increasing numbers of ships beginning to transit the main deepwater channel, which in turn has led to more ship "passing" events within this main channel. The pilots indicate that relocating the navigation aids from the outside of the channel to the centerline will encourage vessel captains to utilize the entire travel lane and not travel close to the centerline. If the USCG approved relocating the aids to navigation to the centerline, a buoy spacing interval of 7,600 feet is recommended.

**5. What impacts, both positive and negative, would changes to existing routing measures or new routing measures have on the study area?**

Changes to the existing routing measures that do not take into account the available deep draft approaches will result in increased fuel consumption and other operating costs. If vessels are required to take alternate routes that avoid military restricted areas, wind energy areas, and other navigational constraints, navigation safety may be compromised as approach angles are restricted and vessels must choose shallow and narrow approaches to the entrance channels. The present approaches, proposed wind energy areas, and designated military restricted areas have the potential to force military and commercial vessel to compete for the same traffic area and may potentially cut off the most efficient and safest routes of access to the Port.

The VMA recommends establishing deep draft routes in the natural deep water channels and straightening the Southern approach channel to improve navigation safety and efficiency. These

routes and modifications may be established with little need for current or future dredging, thus reducing long term maintenance costs. The VMA opposes any expansion of the current safety zone restrictions around military vessel movements.

**6. Where do you transit? Where are your transit routes? What criteria are used in determining your transit routes?**

The deep draft ships entering the Port of Hampton Roads naturally follow the deep draft routes for safety and operating efficiency, especially during periods of bad weather. Available AIS data confirms the current vessel traffic patterns entering the Port of Hampton Roads. The VMA recommends permanently establishing these deep draft routes as charted approaches to the entrance to Chesapeake Bay.

**7. Other Considerations?**

As previously mentioned, the VMA is not aware of any proposed buffer zones or proposed RNA's associated with the WEA's and strongly opposes the establishment of any regulated areas that would limit access to the deep draft routes.

As part of the study, the VMA respectfully asks that the USCG ensure that proper lighting and marking of any fixed structures that may be constructed in the future. Structures must be clearly recognizable and visible to the eye and radar sufficiently enough to allow vessel operators to make necessary course changes in the worst of conditions.

Any cabling or other infrastructure placed on the sea floor must not impose draft limitations and have sufficient safeguards in place to protect from strikes and ships anchors dropped or dragged.

Currently, the safety zones established around the movement of certain Navy vessels and military exercises has a significant and adverse effect on commercial ships and port operations in the Port of Hampton Roads. The Navy, Coast Guard, and the commercial industry have worked together to mitigate the effect on commercial activity. However, the VMA would oppose any measures that increase the frequency or duration of the limitations placed on commercial shipping.

Also, the anticipated funneling of commercial ships into delineated port access routes may affect the ability of masters to comply with speed limitations during periods of Right Whale Seasonal Management Areas or Dynamic Management Areas.

The VMA appreciates the opportunity to comment on the ACPARS and we are prepared to assist the Coast Guard in this process. We encourage the Coast Guard to work with commercial maritime interests, including trade associations, shipping lines, ship agents, pilot organizations, and tug operators to ensure the paramount right of navigation. Please call us if there are any questions or additional information we can provide.

Sincerely,



David White  
Vice President