

(via [www.regulations.gov](http://www.regulations.gov))

June 13, 2017

TO: United States Coast Guard

RE: **Docket #USCG-2017-0079**  
**Security Zone; Delaware River, Schuylkill River; Philadelphia, PA**

Dear Sir or Madam:

Thank you for the opportunity to comment on the notice of proposed rulemaking which would implement a permanent security zone within portions of the Delaware and Schuylkill Rivers in the vicinity of the Philadelphia International Airport.

The Delaware River maritime community appreciates the challenges the Coast Guard faces when given short notice of arriving/departing VIPs at the airport. However, the Coast Guard must also appreciate that closing the river or any portion thereof to commerce for any duration presents several logistical, operational, and economic challenges. We ask the agency to consider the following comments and questions as it formulates this rulemaking.

1. First, port stakeholders ask that Coast Guard provide assurance that the implementation of security zones on these waterways is necessary to protect VIPs and the public. That is, on what basis has the agency determined that an attack from the waterway against arriving/departing planes is likely and is high enough to warrant the designation of such a security zone?
2. Under a permanent security zone, how much notice does Coast Guard anticipate providing the maritime community when the zone will be enforced? The maritime community requires a minimum of 24 hours' advance notice. This is especially important in this region because of the need to plan around the tides.
3. What is the estimated average enforcement period duration for a given VIP event?
4. Will the Coast Guard indicate the duration of the enforcement period when notice is provided or will it issue a separate communication when the enforcement period is over? We request that Coast Guard include an estimated duration when issuing the enforcement notice and a separate communication when the enforcement period is concluded.
5. We understand the USCG cannot share all the aspects of a security zone with industry; however, we ask that Coast Guard indicate those critical criteria that would preclude a vessel from remaining in or transiting through the zone. This would allow for the planning of any operation. In addition, please outline the process for approval.
6. Historically, ships/barges at the berth or anchorage for cargo and/or bunkering operations when a security zone is established have been allowed to continue operations. Having this capability is crucial to both navigational safety and efficient commercial maritime operations. We strongly recommend that Coast Guard continue to allow those operations.

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7. We recommend the Coast Guard stand up the MTSRU during these events to ensure a common point for standardized communications.

Once again, thank you for the opportunity submit these comments.

Sincerely,

Dann Marine Towing  
Diamond State Port Corporation  
Energy Transfer Partners  
Hueber Launch Service  
The Mariners' Advisory Committee for the Bay and River Delaware  
The Maritime Exchange for the Delaware River and Bay  
McAllister Towing of Philadelphia, Inc.  
OSG Ship Management  
Philadelphia Energy Solutions  
Pilots' Association for the Bay and River Delaware  
South Jersey Port Corporation  
Vane Brothers, Inc.  
Wilmington Tug, Inc.