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Mark A. Wright
Vice President – Southern Region

November 8, 2021

LCDR Sarah Krolman
U.S. Coast Guard Headquarters
2703 Martin Luther King Jr. Ave. SE
Washington, D.C. 20593

RE: Docket Number: USCG-2021-0191.
Waterways Commerce Cutter Acquisition
Program; Preparation of a Programmatic
Environmental Impact Statement

Dear LCDR Krolman:

The American Waterways Operators is the tugboat, towboat and barge industry's advocate, resource, and united voice for safe, sustainable, and efficient transportation on America's waterways, oceans, and coasts. AWO's member companies own and operate towing vessels on the U.S. inland and intracoastal waterways; the Atlantic, Pacific, and Gulf coasts; and the Great Lakes. Our industry's 6,200 towing vessels and 33,000 barges comprise the largest segment of the U.S.-flag domestic fleet. Each year, our vessels safely, securely, and efficiently move more than 665 million tons of cargo critical to the U.S. economy, including petroleum products, chemicals, coal, grain, steel, aggregates, and containers. Tugboats also provide essential services in our nation's ports and harbors, including shipdocking, tanker escort, and bunkering.

Thank you for the opportunity to comment on the draft of the Programmatic Environmental Impact Statement (PEIS) for the Waterways Commerce Cutter (WCC) program. The continued need for physical aids to navigation (AtoNs) has been well established through the collaborative work of the Coast Guard-AWO Safety Partnership's Mid-America Regional Quality Steering Committee (RQSC). The RQSC's Western Rivers AtoN Efficiency Quality Action Team (QAT) established the essential and continuing need for physical AtoNs to navigate the Western Rivers safely and efficiently. The QAT's report was submitted to the docket for consideration during the Western Rivers Waterways Analysis and Management System study process.

AWO supports the preferred alternative as laid out in the PEIS: replacing up to 30 WCCs. Alternative 1 will maximize safety and efficiency on the waterways, and any action that increases safety and efficiency will lead to direct and indirect environmental benefits that should be considered when assessing the environmental

impact of this program. Without adequate and timely AtoN delivery, the risk of groundings, collisions, and allisions will rise, increasing the incidence of spills to water of fuel or cargo. River closures due to inadequate AtoN placement will lead to more time spent idling, decreasing the carbon efficiency of the most carbon efficient mode of transportation. Alternative 1 will improve and support the nation's economy and environment. There are, however, other considerations the Coast Guard should take under advisement to maximize the environmental efficiency of the WCC program.

If the Coast Guard adopts Alternative 1, it should ensure that repairs to the WCC fleet can be executed quickly. To facilitate timely repair, the Coast Guard should adhere to the Biden Administration's "Made in America" principles when building the new fleet of WCCs. Constructing the new fleet in American shipyards with parts that are commonly used by towing vessels will ensure that components are easily sourced for future repairs and compatible between vessels, avoiding problems that plague the current buoy tender fleet. These extended downtimes threaten the safety and efficiency of the waterways.

Vessel uniformity will also allow cutter crews to be certified across vessels and not limited to a single vessel. As has occurred several times during the COVID-19 pandemic, cutters were taken out of service because crews could not operate another vessel under current Coast Guard policies and procedures. In some cases, a vessel in good repair could not perform its mission because there was not a healthy crew, and healthy crewmembers could not perform their mission because the vessel to which they were assigned had mechanical difficulties. Instead of one non-mission-ready vessel in a Sector, there were often two non-mission-ready vessels in a Sector.

When constructing the WCCs under Alternative 1, the Coast Guard should also ensure that the vessels are equipped to use non-ferrous buoys. While steel buoys are most commonly used now, the new WCCs will be in use for at least 30 years. Buoy composition or design may well change in that time. There are also benefits now for the Coast Guard to explore the use of other materials for buoy construction. Lighter, less expensive materials, such as plastic, could ease any challenges the Coast Guard may have in sourcing or placing buoys.

The new WCCs will also allow for mixed-gender crews, giving greater flexibility with crewing and deployment. This improvement on the existing vessels would afford an equal opportunity to develop personnel skills and qualifications – a win for the Coast Guard and the nation.

Alternative 1 provides the best option for the economy, the environment, and personnel development in the Coast Guard. Without reliable, mission-ready WCCs, navigation safety and American economic competitiveness will erode.

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Thank you again for the opportunity to comment. AWO looks forward to continued engagement with the Coast Guard throughout this process to promote the safety and efficiency of navigation.

Sincerely,

A handwritten signature in cursive script that reads "Mark A. Wright". The signature is written in black ink and is positioned below the word "Sincerely,".

Mark A. Wright
Vice President – Southern Region