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June 11, 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 national trade association for the tugboat, towboat, and barge industry. AWO's member companies own and operate towing vessels operating on the U.S. inland and intracoastal waterways; the Atlantic, Pacific, and Gulf coasts; and the Great Lakes. Our industry's 5,500 towing vessels and 31,000 barges comprise the largest segment of the U.S.-flag domestic fleet. The tugboat, towboat, and barge industry provides family-wage jobs and ladders of career opportunity for more than 50,000 Americans, including 38,000 positions as mariners on board our vessels, and supports more than 300,000 jobs in related industries nationwide. Each year, our vessels safely, securely, and efficiently move more than 760 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 scoping process 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 process.

Alternative 1: Replacement of up to 30 WCCs

AWO supports Coast Guard programs that maximize safety and efficiency on the waterways, making Alternative 1 the preferred option. Any action that decreases safety and efficiency leads to direct and indirect environmental harm. 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. Also, river closures due to inadequate AtoN placement 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.

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 and using 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.

Vessel uniformity will also allow cutter crews to be certified across vessels and not bound 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 a healthy crew 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.

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

Alternative 2: Reduce Acquisition of Coast Guard Owned and Operated Systems

The Coast Guard should consider Alternative 2 if utilizing contractor-owned vessels would increase the speed with which mission-ready WCCs are available. The Coast Guard should consider this option only if the safety and efficiency of navigation would be significantly improved in a shorter period of time.

Alternative 3: Mixed Fleet

Alternative 3 discusses increased use of electronic AtoNs (eAtoNs). While AWO supports the development of a more robust eAtoN system, they should not replace physical AtoNs. The Western Rivers AtoN QAT conducted a baseline assessment of floating AtoNs with experienced licensed mariners, Sector Commanders, and the

commanding officers of buoy tenders. The report concluded that “electronic navigation aids are not sufficient to replace physical aids on the vast majority of the Western Rivers” and that “mariners’ ability to ‘read’ the river facilitated by the physical buoys is critical to safe navigation.” The QAT determined that electronic aids “should be viewed as a supplement to augment floating buoys and not a replacement.” Replacing necessary physical AtoNs with eAtoNs would decrease safety and efficiency, particularly on the inland waterways.

Alternative 4: No New Action

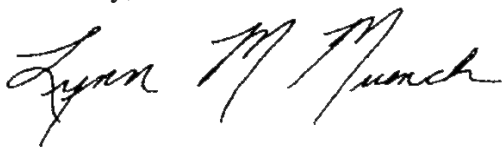
The No Action Alternative would be the worst outcome for the nation. Replacing the current aging, inefficient buoy tender fleet with modern, safer, more efficient vessels will lead to safer and more environmentally sustainable operations. With the current fleet, AtoN delivery – particularly on the Western Rivers – is unreliable and insufficient, harming the national economy as movements of commodities for import and export face added cost and added safety risks. Replacing that fleet will lead to improved safety and efficiency for our industry and for the nation.

Conclusion

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

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 black ink that reads "Lynn M Muench". The signature is written in a cursive style with a large initial "L" and "M".

Lynn Muench
Senior Vice President – Regional Advocacy