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Caitlyn E. Stewart
Vice President – Regulatory Affairs

August 7, 2026

Mr. Matthew N. Giacona
Acting Director
Bureau of Ocean Energy Management
1849 C Street NW
Washington, DC 20240

Re: Request for Information:
Potential Use of the Outer
Continental Shelf for Offshore
Space Launch and Re-Entry
Activities (Docket No. BOEM-
2026-0232)

Dear Mr. Giacona:

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. As the largest segment of the nation's 45,000-vessel domestic maritime fleet, our industry plays a vital part in America's supply chain and national security, moving the nation's commerce on U.S. inland and intracoastal waterways, the Atlantic, Pacific and Gulf Coasts, and the Great Lakes. On behalf of AWO's more than 300 member companies, we appreciate the opportunity to comment on the Bureau of Ocean Energy Management's *Notice of Request for Information: Potential Use of the Outer Continental Shelf (OCS) for Offshore Space Launch and Re-Entry Activities* (BOEM-2026-0232).

AWO supports the continued growth of the U.S. commercial space industry and the national priorities it advances. Our comments are offered in that same spirit: to ensure that as BOEM considers offshore space launch and re-entry uses of the OCS, potential adverse impacts on existing maritime commerce and navigation safety are identified early and minimized to the extent possible to prevent future conflicts and facilitate the shared success of the maritime and commercial space industries.

In response to Question g. AWO has been actively engaged with the U.S. Coast Guard on the development of shipping safety fairways along the Atlantic Coast and elsewhere and urges BOEM to build on that work as it considers potential OCS space launch and re-entry uses. As competing OCS uses continue to proliferate, shipping safety fairways will become even more critical to preserving reliable, predictable and safe coastal navigation routes. BOEM should

therefore treat existing and proposed shipping safety fairways as a baseline constraint in any leasing, siting or authorization framework. Offshore space launch and re-entry sites should not be sited or structured in a way that narrows, bisects or otherwise imposes new limitations on established or proposed fairways.

In response to Questions d. and g., BOEM should recognize that offshore space activity can affect navigation beyond the physical footprint of any platform or fixed piece of OCS infrastructure. Ship Hazard Areas (SHAs), debris zones, Regulated Navigation Areas (RNAs), and Limited Access Areas (LAAs) may be temporary, but they can still create operational disruptions and logistical challenges. For that reason, BOEM should evaluate the functional hazard footprint of proposed OCS space activity, not only the location of any physical structure, when considering lease areas, environmental analysis, and potential conflicts with maritime commerce.

To support that analysis, BOEM should require navigation safety assessments for these potential lease areas, including AIS-based mapping of vessel traffic that overlaps with potential OCS launch and re-entry areas; analysis of expected hazard footprint size and location and how that footprint may evolve as vehicle reliability changes over time; and assessment of how both permanent infrastructure and temporary or periodic regulated areas would interact with existing and proposed shipping safety fairways and general vessel traffic.

Beyond siting and environmental review, BOEM should also recognize the role of existing Coast Guard processes in minimizing navigational impacts once launch or re-entry activity is underway. **In response to Questions d., h. and i.,** AWO recommends using the existing model under which commercial space vehicle operators enter into Letters of Intent with the Coast Guard to establish procedures for mariner notification of commercial space activity that could impact their operations and other operational controls when necessary. Given that the Federal Aviation Administration, not BOEM, licenses launch and re-entry activity, BOEM should use Coast Guard coordination to inform any OCS lease or authorization and, where appropriate, condition approval on continued coordination with the Coast Guard. This ensures BOEM, vessel operators and mariners understand resulting hazard areas and navigation impacts before final leasing or siting decisions. Similarly, we reiterate the need for adequate advance notice to mariners, including at least 30 days for public comment on any proposed RNA or LAA and at least three days' notice before enforcement of temporary or periodic regulated areas.

In response to Question k., AWO recommends that BOEM continue to consult with the maritime industry to inform any future policy development, guidance or leasing framework. AWO members and other maritime industry segments are already engaged in the commercial space sector and operate daily in the coastal and offshore waters where this activity could occur, giving the industry direct operational expertise to contribute as BOEM evaluates next steps.

Thank you for the opportunity to comment on this request for information.

Sincerely,

A handwritten signature in cursive script that reads "Caitlyn E. Stewart". The signature is written in a dark ink and is positioned above the printed name and title.

Caitlyn Stewart
Vice President – Regulatory Affairs
The American Waterways Operators