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Brian W. Vahey
Vice President – Atlantic Region

June 12, 2025

First Coast Guard District
Planning Division
408 Atlantic Avenue
Boston, MA 02110

Re: Project No. 01-25-015

Dear Sir or Madam:

The American Waterways Operators (AWO) 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. Our industry is the largest segment of the nation's 40,000-vessel domestic maritime fleet and moves 665 million tons of cargo each year safely, sustainably and efficiently. On behalf of AWO's more than 300 member companies, we appreciate the opportunity to provide feedback on the Coast Guard First District's Coastal Buoy Modernization Project.

Physical aids to navigation (AToNs) are essential for ensuring safe navigation for all types and classes of vessels. Although the maritime industry is gradually becoming more reliant on digital information, commercial and recreational vessel operators continue to rely on physical aids because they provide reliable, tangible navigation reference points that transcend experience level and language barriers. AWO opposes any broad-based effort to eliminate physical AToNs.

For the towing industry, mariners rely on physical aids for far more than demarcating a safe area for navigation. Vessel operators use entrance buoys to mark the entrance to port areas and assist tugs use them as meeting points for larger vessels entering the port. RACON buoys allow operators to use physical aids in conjunction with their ship's radar to ensure safe navigation in low visibility conditions. In addition, critical buoys are outfitted with both audible and visual delineators, such as a bell, gong or whistle, 4-second flash or colored flash. These additional features, which were added to eliminate any confusion about which aid navigators are referencing, are important as they provide definitive identification of the aid. Industry practice is to place a towing vessel lookout as far forward and as low to the water as safely possible to allow the lookout to aid the watch officer by using both sight and sound to identify their vessel's position and the location of other maritime traffic. Eliminating buoys impairs the ability of the lookout to identify the vessel's location and increases navigation risk.

AWO understands that maintaining physical aids is costly and time consuming. We understand that periodically re-evaluating the utility of certain buoys is an important part of the Coast Guard's navigation safety mission. However, we are concerned with the District's approach here, which is essentially to propose the decommissioning of hundreds of physical aids and then open the docket for stakeholders from diverse segments of the maritime industry to claim back those buoys that are most important to their specific navigation safety needs. In a shared waterway system, a physical AtoN that recreational boaters rely on is important to a tugboat captain not necessarily because the captain uses that buoy too, but because they rely on the safe operation of every other vessel on the water. Asking mariners to, in effect, provide comments only on their industry's use of physical AtoNs – or even just their *company's* use of physical AtoNs – runs counter to goal of ensuring navigation safety in a shared, multi-use waterway system.

Relatedly, AWO members believe that federal agencies are emphasizing electronic navigation systems in the wheelhouse much too quickly. In late 2024, the National Oceanic and Atmospheric Administration ceased producing traditional paper raster nautical charts, forcing the transition to electronic navigational charts. Decommissioning physical aids while vessel operators are still transitioning away from paper charts is not prudent. Furthermore, the Coast Guard is undertaking this effort to move to virtual AToNs at the same time that the agency's cybersecurity rulemaking has highlighted the maritime industry's vulnerability to cyber incidents.

Recent incidents in the aviation industry have also highlighted the dangers of over-reliance on electronic systems. Similar risks exist in maritime navigation. Electronic navigation charts (ENCs) and Global Navigation Satellite Systems (GNSS) are useful tools, but they are not infallible. Because internet-connected systems are potentially vulnerable to a cyber incident, it is important to maintain a comprehensive, "belt and suspenders" approach to navigation safety by maintaining all physical AToNs in the District.

For all these reasons, AWO has not singled out specific physical AToNs for retention or elimination in this letter. Instead, we urge the Coast Guard to convene stakeholder meetings in every major District 1 port area to allow for collaborative discussion among waterways users and reach consensus recommendations on any AToNs that may be unnecessary for the safety of the waterway as a whole. AWO members participated actively in a similar effort that the Fifth Coast Guard District conducted approximately 10 years ago and we would welcome the opportunity to engage in a similar effort with District 1.

Thank you for the opportunity to comment. We would be happy to provide additional information as needed.

Sincerely,

A handwritten signature in cursive script that reads "Brian W. Vahey". The ink is dark and the signature is fluid, with a large, stylized 'V' at the end.

Brian Vahey
Vice President – Atlantic Region