



801 North Quincy Street
Suite 500
Arlington, VA 22203

PHONE: 703.841.9300
EMAIL: cstewart@americanwaterways.com

Caitlyn E. Stewart
Vice President – Regulatory Affairs

June 20, 2025

Mr. Gregory Zerzan
Acting Solicitor
Office of the Solicitor
Department of the Interior
1849 C Street, N.W.
Washington, DC 20240

Re: DOI Regulatory
Reform (Docket No. DOI-
2025-0005; 256D0102DM;
DS6CS00000;
DLSN00000.000000;
DX6CS25)

Dear Mr. Zerzan,

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. As the largest segment of the nation's 40,000-vessel domestic maritime fleet, our industry safely and efficiently moves 665 million tons of cargo each year and enables the flow of goods through ports on the inland and intracoastal waterways; the Atlantic, Pacific and Gulf coasts; and the Great Lakes. On behalf of our more than 300 member companies, we appreciate the opportunity to comment on the Department of the Interior's (DOI) request for information (RFI) to inform its implementation of President Trump's Executive Orders on reducing regulation and controlling regulatory costs.

AWO members are proud to be an integral part of the American maritime transportation system, as well as the safest and most efficient mode of freight transportation. While none of the agencies inside the DOI are primary regulators of the towing industry, DOI regulatory and deregulatory actions have an impact on the U.S. marine transportation system and waterborne commerce. The efficiency and resiliency of America's transportation supply chain is dependent on the public and private sector working together for the benefit of U.S. producers and consumers.

One very important way in which DOI impacts the domestic maritime industry is in its oversight of offshore wind energy development, which it conducts primarily through the U.S. Bureau of Ocean Energy Management (BOEM). BOEM is the agency responsible for awarding leases for offshore wind construction and for managing a multi-year permitting process that includes coordination with other agencies and stakeholders to identify and mitigate potential impacts. This coordination is vitally important to AWO, as the placement of

offshore wind farms has the potential to impede towing vessel transit lanes for the movement of cargoes essential to the U.S. economy, including American energy. We have been working with DOI and its agencies of jurisdiction for 15 years, and across four different presidential administrations, and based on our experience, we are forced to concur with the U.S. Government Accountability Office's April 2025 report finding that BOEM's engagement with and responsiveness to industry groups adversely impacted by offshore wind placement has been inconsistent. To fulfill President Trump's commitment to review federal wind leasing and permitting practices to more adequately assess negative impacts, including on navigational safety interests, we urge DOI to make more robust communication with towing vessel operators a part of any future offshore wind leases moving forward.

Another DOI agency that impacts the domestic maritime industry is the U.S. Fish and Wildlife Service (FWS). Under the Endangered Species Act, the FWS—alongside the National Marine Fisheries Service (NMFS)—shares responsibility for protecting threatened and endangered species. When considering regulatory action to protect species in navigable waterways, DOI should strive to balance environmental protection with economic and navigational safety needs. Overly restrictive measures could hinder maritime commerce or compromise navigational safety. Therefore, regulatory decisions must be transparent, evidence-based, and developed in collaboration with affected stakeholders to ensure ecological, economic, and operational needs are met. AWO believes that using technology to enhance species monitoring and inform necessary conservation mitigations, rather than imposing blanket operational restrictions, is one of the best ways to meet ecological, economic, and operational needs.

Thank you again for the opportunity to comment. AWO would be pleased to provide additional information if needed.

Sincerely,

A handwritten signature in dark ink, reading "Caitlyn E. Stewart". The signature is written in a cursive, flowing style.

Caitlyn Stewart
Vice President – Regulatory Affairs