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April 23, 2025

Ms. Stacey Molinich Zee Manager, Operations Support Branch Federal Aviation Administration 800 Independence Avenue, SW Washington, DC 20591 Brian W. Vahey Vice President – Atlantic Region

Re: Request for Comment (FAA-2025-0114)

Dear Ms. Zee:

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 comment on the Federal Aviation Administration's Draft Environmental Assessment (EA) SpaceX Falcon 9 Operations at Space Launch Complex 40 on Cape Canaveral Space Force Station in Florida.

Florida's maritime industry supports over 65,000 jobs, generating almost \$4 billion in labor income while contributing over \$23 billion in total revenue and almost \$15 billion directly to Florida's Gross Domestic Product. Space exploration activity over our nation's waterways has the potential to disrupt these operations during launch and landing activities. While SpaceX states Falcon 9 launches have a 99% success rate, it is vital the proper procedures are in place to prevent any unnecessary waterway closures, obstructions, or other disruptions caused by launch or landing failures. As discussed in the EA it is SpaceX's sole responsibility, as the acting space party, to limit risk to navigation safety. Space launch operations can affect navigation safety due to potential hazards such as, but not limited to, fallen debris, surface explosions, and submerged obstacles.

AWO appreciates and thanks SpaceX for collaborating with the Coast Guard through a letter of intent to ensure Ship Hazard Areas, Limited Access Areas, and Regulated Navigation Areas are issued as necessary. This ensures that our nation's waterways and mariners are kept safe, and our vital supply chain stays reliable.

Thank you for the opportunity to comment on the Federal Aviation Administration's Draft Environmental Assessment SpaceX Falcon 9 Operations at Space Launch Complex 40 on

Cape Canaveral Space Force Station in Florida. AWO would be pleased to provide additional comments or further information as the agency sees fit.

Sincerely,

Brian W. Vahey

Vice President – Atlantic Region

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