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Brian W. Vahey
Vice President – Atlantic Region

October 12, 2026

Ms. Eva Long
FAA Environmental Protection Specialist
ICF
1902 Reston Metro Plaza
Reston, VA 20190

Re: Notice of Intent to Prepare a
Supplemental Environmental
Impact Statement for SpaceX
Starship-Super Heavy Operations
at Space Launch Complex 37
(FAA-2026-10792)

Dear Ms. Long,

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 scope of the Federal Aviation Administration's Supplemental Environmental Impact Statement (SEIS) for SpaceX Starship-Super Heavy operations at Space Launch Complex 37 (FAA-2026-10792).

AWO members are proud to support the pioneering work of the U.S. commercial space industry and the national priorities it advances. U.S. towing companies have been providing services for space launches for several years and are committed to facilitating safe launches and with minimal impacts to the efficient movement of the waterways transportation system. Our comments are offered in that spirit and in the interest of ensuring that any and all potential conflicts are identified early so that the FAA can work with stakeholders to minimize them.

The FAA's proposed action includes conducting up to 76 Starship-Super Heavy launches and 152 landings annually, including return-to-launch-site and ocean landings. The SEIS will also evaluate a proposed contingency landing area in the Atlantic Ocean beginning one nautical mile or more from shore and extending along the coast north and south of the launch site.

Given the location and potential frequency of these operations, AWO recommends that the SEIS evaluate existing commercial vessel traffic within and near the proposed contingency

landing area and any associated ship hazard areas or regulated areas. The analysis should (1) identify potential overlaps with established shipping routes, navigation fairways, port approaches, and areas of concentrated vessel traffic; (2) evaluate the potential need for vessel rerouting, delay, or access restrictions; and, (3) consider the operational consequences for maritime commerce.

AWO appreciates SpaceX's and FAA's continued coordination with the U.S. Coast Guard to protect mariners during launch and landing operations. Consistent with our previous comments, AWO recommends that FAA and SpaceX continue working with the Coast Guard and affected maritime stakeholders to ensure that any Ship Hazard Areas, Limited Access Areas, Regulated Navigation Areas, safety zones, or other maritime safety measures are appropriately located, clearly communicated, and implemented with sufficient advance notice to minimize unnecessary disruptions to vessel operations and maritime commerce.

Thank you for the opportunity to provide scoping comments on FAA-2026-10792. AWO would be pleased to provide additional information or answer any questions.

Sincerely,

A handwritten signature in cursive script, reading "Brian W. Vahey". The ink is dark and the signature is fluid.

Brian W. Vahey
Vice President – Atlantic Region
The American Waterways Operators