The American Waterways Operators

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Brian W. Vahey
Vice President – Atlantic Region

October 30, 2026

Ms. Amy Hanson
c/o ICF
1902 Reston Metro Plaza
Reston, VA 20190

Re: Federal Aviation Administration's Draft Environmental Assessment for Blue Origin New Glenn Cadence Increase at Space Launch Complex 36A (FAA-2026-9841)

Dear Ms. Hanson,

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 Federal Aviation Administration's Draft Environmental Assessment (EA) for Blue Origin New Glenn Cadence Increase at Space Launch Complex 36A (FAA-2026-9841).

AWO members are proud to support the pioneering work of the U.S. commercial space industry and the national priorities it advances. U.S. barge and towing companies have been providing services for the commercial space industry for several years and are committed to facilitating safe launches and reentries while minimizing impacts to the efficient movement of the maritime transportation system (MTS). AWO is not currently aware of any operational impacts stemming from Blue Origin New Glenn operations affecting our members. Our comments are offered in the interest of ensuring that any potential conflicts due to the proposed increase in launch cadence are identified early so that the FAA can work with the Coast Guard and relevant stakeholders to minimize them.

Given the draft EA's acknowledgment of possible impacts on maritime commerce, and the existing and anticipated growth in launch and reentry operations near Cape Canaveral, AWO recommends that the FAA work with the Coast Guard to evaluate potential impacts on existing commercial vessel traffic within the proposed launch and landing areas and any associated Ship Hazard Areas or Regulated Navigation Areas (e.g., 33 C.F.R. § 165.775). The analysis

should use vessel AIS data to (1) identify potential overlaps between the activity that would be authorized by the vehicle operator license and 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 resulting from potential overlaps; and, (3) consider the operational consequences for maritime commerce as a result. The results of this assessment should be included in the final EA.

This recommendation is not intended as an economic analysis as that can be influenced by a number of factors, as outlined in the draft EA. The intent is to have an assessment of MTS impacts commensurate to the National Airspace System assessment included in the draft EA so that potential impacts to maritime commerce are meaningfully assessed.

AWO appreciates Blue Origin's and the FAA's continued coordination with the U.S. Coast Guard to protect the public and commercial mariners during launch and landing operations. Consistent with our previous comments, AWO recommends that the FAA and Blue Origin 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 comments on FAA-2026-9841. AWO would be happy to provide additional information or answer any questions.

Sincerely,

Brian W. Vahey

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