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Jill Bessetti
Vice President – Southern Region

September 2, 2025

Rear Admiral Will Watson
USCG Heartland District Commander
500 Poydras Street
New Orleans, LA 70130

Re: USCG-2025-0579

Dear Admiral Watson:

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's proposed Anchorage Ground 1 for the Neches River in Port Arthur, TX.

AWO supports the establishment of a federal anchorage on the Neches River, recognizing its potential benefits for the maritime community. We appreciate the opportunity to emphasize the importance of ensuring that any new anchorage does not disrupt the operations of existing barge fleeting facilities in the area. Kirby Inland Marine is a well-respected AWO member company that has been serving the region reliably and safely in this area for the past decade.

The proposed anchorage ground is in very close proximity to Kirby's barge fleeting facility. Ships have routinely used the anchorage area and there have been several near misses recorded by the fleet. It is imperative that the boundaries for the proposed anchorage are clear and enforced. We support the recommended safeguards provided by Kirby Inland Marine, as outlined below.

Recommended Safeguards

To effectively address these concerns and safeguard the interests of longstanding fleeting operations and the broader waterway community, AWO recommends the following enforceable measures be included in any final rule governing the proposed anchorage:

- Maintain a buffer zone, establishing a minimum distance of 400 feet between anchor drops and the northern boundary of the anchorage to protect fleeting operations.

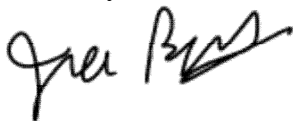
- Restrict the length of anchor chain that vessels are permitted to deploy within the anchorage, helping to keep operations within safe parameters.
- Limit the anchorage to one vessel at a time, reducing cumulative risks and simplifying navigation in the vicinity of established fleets.
- Institute operational restrictions during adverse weather events, including prohibiting anchoring when named storms are present in the Gulf of America or during river flooding, further minimizing risk in extreme conditions.
- Consider additional rules to ensure ships remain strictly within the designated footprint and do not encroach upon adjacent fleeting areas.

Additionally, AWO strongly encourages the Coast Guard to conduct formal engagement with key stakeholders—including fleet operators, the local Vessel Traffic Service, and the Sabine-Neches Pilots—to collaboratively identify and mitigate risks. We also support consideration of a Navigation Safety Risk Assessment to help ensure navigation safety in the area.

In closing, AWO supports the development of a federal anchorage that strengthens navigation and commerce on the Neches River but urges that it be implemented in a way that preserves the safety, stability, and efficiency of established fleeting operations. With thoughtful operational safeguards and robust stakeholder collaboration, we are confident a solution can be reached that benefits all waterway users.

Thank you for the opportunity to comment on the USCG-2025-0579 docket which proposes to establish Anchorage Ground 1 on the Neches River. AWO would be happy to answer any follow-up questions as requested.

Sincerely,

A handwritten signature in black ink, appearing to read "Jill Bessetti", with a stylized flourish at the end.

Jill Bessetti
Vice President – Southern Region