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Jill Bessetti
Vice President – Southern Region

September 8, 2026

Mr. Doug Blakemore
Bridge Administration Branch Chief
U.S. Coast Guard Heartland District
500 Poydras St.
New Orleans, LA 70130

Re: Drawbridge Operation
Regulation; Old Brazos River,
Freeport, Texas (USCG-2025-0309)

Dear Mr. Blakemore:

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 our over 300 members, we appreciate the opportunity to comment on the U.S. Coast Guard's proposed rule to authorize remote operation of the Union Pacific Railroad Drawbridge that crosses the Old Brazos River at mile 5.3 (USCG-2025-0309).

We appreciate the Coast Guard's incorporation of our recommendation to treat the failure of remote operation systems as an operational failure, as outlined in the proposed regulations. This approach appropriately prioritizes the safety and right of way of vessel traffic and reflects the Coast Guard's commitment to responsible oversight of remotely operated bridges. This is a meaningful improvement that addresses one of our core concerns regarding the risks posed by remote bridge operations.

Recognizing this operational improvement, AWO reiterates three safety recommendations raised in our previous comments and one additional recommendation that was not addressed in this proposed rule. We encourage the Coast Guard to consider the following recommendations in future Coast Guard actions:

Bridge Remote/Automated Operation Request Guide

We encourage the Coast Guard to begin posting information submitted through the Bridge Remote/Automated Operation Request Guide to the Federal Register. While we understand the sensitivity of certain information contained within this guide, AWO believes "Section 4:

Remote Operations Plan” and “Section 5: Contingency Plan” provide valuable insight for navigation stakeholders in the evaluation of these notices.

Incident Investigation

The growing number of incidents and near-misses involving remote and movable bridge operations underscores the need for comprehensive safety protocols and operational guidelines. We request the Coast Guard fully investigate and document incidents involving remote and movable bridge operations. We offer our continued support to help the Coast Guard coordinate best practices for vessel operators to minimize risk before authorizing further requests for remote or automated bridge operations.

Bridge & Remote Operation Center Location Inconsistencies

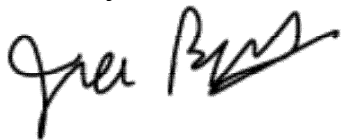
Additionally, the Federal Register notice still offers 2 different locations for the bridge in question and 3 different locations for the remote operation center operating the bridge. The proposed rule summary refers to the bridge at mile 5.3 while the proposed regulatory text refers to the bridge at mile 4.4. AWO and our members have observed repeated inconsistencies with bridge locations and clearances in Coast Guard publications and regulations. We reiterate the need for this information to be consistent, not only for operational safety, but for incident investigation integrity. The proposed rule also includes 3 different locations for the remote operations center this bridge will be operated from: Brazos, TX, Brazoria, TX, and Spring, TX. Furthermore, the proposed regulatory language states that the bridge will be remotely operated by the CSX yard supervisor in Freeport, TX. We urge the Coast Guard to provide a consistent location for the remote operation facility and personnel in a final rule, if one is issued, to ensure the bridge remains in the open-to-navigation position if the remote operations center is evacuated as required by the proposed regulation. It is critical that the location of the remote operations center be clear so that this requirement can be followed and appropriately enforced.

AWO looks forward to seeing these recommendations addressed in future Coast Guard actions as the agency continues to strengthen its framework for movable and remote bridge operations and oversight.

We remain committed to working collaboratively with the Coast Guard and bridge owners and operators to promote the safe and efficient movement of vessels on America’s waterways.

Thank you for the opportunity to comment on USCG-2025-0309. AWO would be happy to answer any questions or provide additional information as needed.

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
The American Waterways Operators