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Brian W. Vahey  
Vice President – Atlantic Region

June 22, 2026

Ms. Maureen Kallgren  
Office of Navigation Standards  
U.S. Coast Guard  
2703 Martin Luther King Jr. Ave SE  
Washington, DC 20032

Re: Notice of Availability of Draft  
Programmatic Environmental  
Impact Statement for Shipping  
Safety Fairways Along the Atlantic  
Coast (Docket No. USCG-2023-  
0928)

Dear Ms. Kallgren:

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 of 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 Draft Programmatic Environmental Impact Statement for Shipping Safety Fairways Along the Atlantic Coast.

AWO members lead the maritime industry in safety, security, and environmental sustainability. We remain committed to working with federal and state agencies to advance these shared objectives. As new uses of America's waterways are developed, it is critical that such projects not produce navigational hazards that put vessels and their crews at risk or obstruct the movement of commodities on which the nation's economy depends. It is with these concerns in mind that we have worked closely with the U.S. Coast Guard during the development of shipping safety fairways and with the Bureau of Ocean Energy Management on the siting of wind energy development areas.

In previous comments to the Coast Guard, AWO has stressed the need for 9-nautical-mile safety fairways to ensure that tugboats and barges can continue to safely and sustainably move cargo along the Atlantic Coast. Preserving safe navigation routes by establishing fairways is

increasingly important as offshore wind development and other ocean uses, such as aquaculture, energy and mineral extraction, and floating data centers, proliferate. Ensuring that fairways have adequate width is necessary so that vessel operators can right a vessel in the event of an emergency and reduce the risk of collisions and allisions with other vessels and offshore structures. Adequate space is also needed so vessels can safely navigate around avoid shoals and other shallow-water areas.

A robust system of fairways is critical to human safety and environmental protection. Tug-barge units carry sensitive cargoes, and collisions, allisions, and groundings risk releasing these cargoes into the water. The Programmatic Environmental Impact Statement (PEIS) must consider how the increased risk that offshore structures pose to vessel traffic might impact the environment.

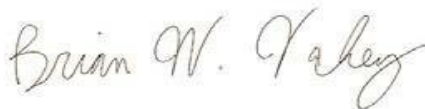
AWO supports Alternative 1, the Coast Guard's proposed action, detailed in the PEIS. Establishing a system of fairways along the Atlantic Coast will cover most of the barge and towing vessel traffic on the East Coast from Maine to Florida and ensure that mariners have sufficient space to navigate safely and sustainably.

We do not oppose Alternative 2. However, our members are unlikely to use additional fairways extended to the limit of the Exclusive Economic Zone, and we therefore reserve comments on the necessity of such fairways.

We are, however, seeking certain alterations to the proposed Atlantic Coast fairways. We have shared those recommendations with the Coast Guard through the *Shipping Safety Fairways Along the Atlantic Coast* rulemaking process. We will continue to work with the Coast Guard to ensure that the final fairways provide sufficient space for safe navigation. For the purposes of this PEIS, however, we support the proposed action and urge the Coast Guard to establish shipping safety fairways to protect navigation safety and the marine environment.

In closing, AWO believes that 9-NM fairways are the best way to preserve safety and sustainability, and we encourage the Coast Guard establish fairways from the Gulf of Maine to Florida. Thank you again for the opportunity to comment. I would be pleased to provide additional comments or further information as needed.

Sincerely,

A handwritten signature in cursive script that reads "Brian W. Vahey". The signature is written in dark ink and is positioned above the printed name and title.

Brian Vahey  
Vice President – Atlantic Region