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Brian W. Vahey
Vice President – Atlantic Region

January 17, 2025

Mr. Brian Mottel
Marine Transportation Specialist
Office of Navigation Systems (CG-NAV)
U.S. Coast Guard
790 Ash St SE
Washington, DC 20032

Re: Shipping Safety Fairways in the
Gulf of Maine (USCG-2024-0248)

Dear Mr. Mottel:

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 and efficiently. On behalf of AWO's more than 300 member companies, we appreciate the opportunity to comment on the Central Atlantic Call Area 2 Call for Information.

AWO members lead the maritime industry in safety, security, and environmental sustainability. We are committed to working with federal and state agencies to advance these shared objectives. Our commitment to sustainability includes strong support for the development of renewable energy resources. However, such projects should not produce navigational hazards that jeopardize vessels and their crews or obstruct the movement of commodities on which the nation's economy depends. With these concerns in mind, we have worked closely with the Bureau of Ocean Energy Management and the U.S. Coast Guard on previous requests for comment on wind energy development areas.

AWO supports the establishment of the six proposed fairways and considers them critical to the continued safety of navigation in the Gulf of Maine. As offshore structures and the vessels needed to construct and maintain them proliferate in the region, navigation routes will shift and navigable sea space will grow more crowded. Enshrining navigation safety fairways now is essential to minimizing marine casualties, mariner injuries, and environmental harm.

Establishing the fairways is also needed to avoid undue economic harm from hampering the safe and efficient movement of essential goods provided by the towing industry. Decreased

Docket No. USCG-2024-0248

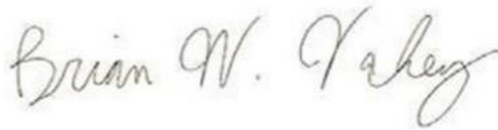
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safety will reduce the willingness of vessel owners to operate in the region and force more cargoes onto less safe and costlier modes of transportation, having a particularly large cost impact on bulk commodities like energy products. Given that this region relies heavily on heating oil, reducing the ability of tugboats and barges to operate safely would have large economic, as well as safety, repercussions.

Thank you again for the opportunity to comment. I would be pleased to provide additional comments or further information as you see fit.

Sincerely,

A handwritten signature in cursive script that reads "Brian W. Vahey". The signature is written in a dark ink and is positioned centrally below the word "Sincerely,".

Brian Vahey
Vice President – Atlantic Region