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Peter J. Schrappen, CAE
Pacific Region Vice President & Regional Team Lead

January 27, 2025

Ms. Hillary Rummel
NEPA Project Manager
VSFB Falcon Lunch EIS
c/o ManTech International Corporation
420 Stevens Avenue, Suite 100
Solana Beach, CA 92075.

Re: (EISX-007-USF-1728547807) Notice
of Intent to Prepare an Environmental
Impact Statement for Authorizing
Changes to the Falcon Launch Program at
Vandenberg Space Force Base

Dear Ms. Rummel:

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 domestic maritime fleet, supporting over 270,000 jobs and moving 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 Department of the Air Force (DAF) Notice of Intent to Prepare an Environmental Impact Statement for Authorizing Changes to the Falcon Launch Program at Vandenberg Space Force Base.

AWO appreciates SpaceX's attention to maritime vessel traffic in previous environmental reviews and its collaboration with the U.S. Coast Guard (USCG) to release Notice to Mariners (NOTMARs) during launching and landing operations. This partnership helps to keep mariners safe, cargo moving, and our nation's critical infrastructure secure.

Understanding the value of this collaborative effort, AWO recommends that SpaceX continue to work with the USCG and industry stakeholders to ensure that Ship Hazard Areas (SHA) issued in NOTMARs are properly marked and include any areas where potential hazards to navigation related to SpaceX launch or landing/reentry activity could impact maritime operations.

Based on previous environmental review documents of space launch activity, SpaceX operations out of Vandenberg Airforce Base pose a potential hazard to maritime operations in the Pacific Ocean including, but not limited to:

- Falling debris
- Explosive events on the water's surface
- Sunken obstructions to navigation

AWO recognizes that these potential hazards may be temporary. As SpaceX tests and makes advancements in rocket design and operation, operational hazards may be reduced. However, all potential hazards to navigational safety should be addressed.

AWO urges the project team to enter into a Letter of Intent with the USCG to minimize the risk of potential hazards to maritime operations. This will ensure the continued issuance of NOTMARs, SHAs, and related notices that keep vessel operators aware of activities that could affect operations and safety. If the establishment of a Limited Access Area (LAA) is deemed necessary, we urge the project team and USCG to engage with local operators and allow for a public comment period of at least 30 days to ensure LAAs do not place unnecessarily onerous restrictions on vessel operations.

Thank you for the opportunity to comment on the DAF's Notice of Intent to Prepare an Environmental Impact Statement for Authorizing Changes to the Falcon Launch Program at Vandenberg Space Force Base. AWO would be pleased to answer any questions or provide further information to assist in the review process.

Sincerely,

A handwritten signature in black ink, appearing to read "Peter Schrappen". The signature is fluid and cursive, with the first name "Peter" being more prominent than the last name "Schrappen".

Peter Schrappen,
Pacific Region Vice President & Regional Team Lead

