



801 North Quincy Street
Suite 500
Arlington, VA 22203

PHONE: (985)-298-2274
EMAIL: jbessetti@americanwaterways.com

Jill Bessetti
Vice President – Southern Region

August 25, 2025

Captain Todd Devries
Director of Western Rivers
USCG Heartland District
500 Poydras Street
New Orleans, LA 70130

Re: Proposed Changes to Aids to
Navigation: GIWW-Rollover Pass-
MM 330-328

Dear Captain Devries,

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 Coast Guard Sector Houston Galveston's Proposed Changes to Aids to Navigation.

Physical aids to navigation (AToNs) are essential for ensuring safe navigation for all types and classes of vessels. Although the maritime industry is gradually becoming more reliant on digital information, commercial and recreational vessel operators continue to rely on physical aids because they provide reliable, tangible navigation reference points that transcend experience level and language barriers. Virtual AtoNs are also not infallible and having a physical marker to back up virtual indicators of key navigational markers is vital to maintaining a safe marine transportation system.

AWO understands that maintaining physical aids is costly and time consuming and that periodically re-evaluating the utility of certain buoys is an important part of the Coast Guard's navigation safety mission. However, considering the critical role AToNs play in maintaining a safe and efficient navigation system, it is essential that the Coast Guard allow for meaningful and thorough feedback on the proposed AtoN changes. To achieve this, AWO suggests the Coast Guard convene stakeholder meetings in addition to a comment period of at least 60 days. Stakeholder meetings have historically been utilized for similar proposals, providing a forum for collaborative discussion among waterway users to develop consensus recommendations regarding AToN needs and proposed changes.

Additionally, the Coast Guard notice regarding these proposed changes does not specify if virtual AtoNs will replace these aids if they are permanently disestablished. If the physical AtoNs are permanently disestablished, AWO urges the Coast Guard to maintain virtual AtoNs on electronic navigation charts in their place.

In closing, AWO opposes the disestablishment of Rollover Pass Daybeacon 1 (LLNR 35805), Rollover Pass Light 2 (LLNR 25810), Rollover Pass Light 4 (LLNR 35830.01), Rollover Pass Light 5 (LLNR 35835), Rollover Pass Light 8 (LLNR 35850), Rollover Pass Light 9 (LLNR 35855.01), Rollover Pass Light 11 (LLNR 35865), and Rollover Pass Light 12 (LLNR 35870). AWO also recommends the Coast Guard implement a stakeholder consultation process to ensure all aspects of navigational safety are addressed before proceeding with any proposed AtoN changes.

Thank you for the opportunity to comment. AWO would be happy to provide additional feedback should you have any questions or concerns.

Sincerely,

A handwritten signature in black ink, appearing to read "Jill Bessetti". The signature is fluid and cursive, with a prominent initial "J" and a long, sweeping underline.

Jill Bessetti
Vice President – Southern Region