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Brian W. Vahey  
Vice President – Atlantic Region

May 13, 2024

CDR Nicholas C. Seniuk  
USCG Seventh District Waterways Management  
Brickell Plaza Federal Building  
909 SE 1st Avenue  
Miami, FL 33131-3050

Re: Regulated Navigation Area; Port  
of Miami, Miami, FL (USCG-  
2024-0205)

Dear CDR Seniuk:

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 U.S. Coast Guard's (USCG) notice of inquiry on the proposed regulated navigation area for the Port of Miami.

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 safety throughout the industry is highlighted by the almost 30-year history of the Coast Guard-AWO Safety Partnership. Together, the Partnership has launched more than 40 cooperative initiatives to advance marine safety and environmental sustainability, including recommendations to prevent towing vessel crew fatalities, best practices to prevent tank barge and towing vessel oil spills, and guidance to enhance cyber risk management in the barge and towing industry.

We support the Coast Guard's proposal to establish a Regulated Navigation Area (RNA) for the Port of Miami. RNAs, like the one proposed, can support mariner and supply chain safety and resiliency. The Port of Miami has seen consistent growth in cargo volume, surpassing 1 million TEUs annually, for five consecutive years and has seen a complementary increase in cruise passenger traffic during that period. The Miami metro area has also seen years of continued growth, leading to increased recreational and commercial vessel traffic.

Docket No. USCG-2024-0205

May 13, 2024

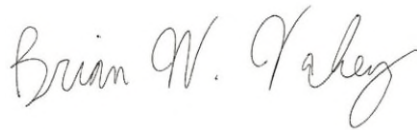
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This increase in cruise and recreational traffic has also created a situation that impacts navigation safety: when two or more cruise ships are in the Main Ship Channel, all recreational vessels have to use Fisherman's Channel, which routes them through diverse commercial traffic. Large recreational vessels like sport fishing boats and yachts often produce large wakes in this busy, working channel. These large wakes have caused mariners to lose balance and fall, parted lines on tugs and barges, and placed undue stress on bunker barge hoses and lines. These interactions increase safety risks to people, the environment and property.

This proposed RNA would slow down vessels that can create large and dangerous wakes in sensitive areas vital to our national supply chain. We appreciate the Coast Guard's effort to address this dangerous situation. We support the RNA because it will protect our mariners and help a shared waterway function more safely.

Thank you for the opportunity to comment on this proposed RNA. AWO would be happy to answer any questions or provide further information as needed.

Sincerely,

A handwritten signature in cursive script that reads "Brian W. Vahey".

Brian Vahey  
Vice President – Atlantic Region