



801 North Quincy Street
Suite 500
Arlington, VA 22203

PHONE: 703.841.9300
EMAIL: cstewart@americanwaterways.com

Caitlyn E. Stewart
Vice President – Regulatory Affairs

September 8, 2025

Mr. Loren A. Smith, Jr.
Deputy Assistant Secretary of Transportation Policy
Office of the Secretary
U.S. Department of Transportation
1200 New Jersey Avenue, Southeast
Washington, DC 20590

Re: U.S. DOT Strategic Plan (Docket No. DOT-OST-2025-0963)

Dear Mr. Smith:

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 our more than 300 member companies, we appreciate the opportunity to comment on the development of the U.S. Department of Transportation's (DOT) Strategic Plan for fiscal years 2026-2030.

DOT and the Maritime Administration (MARAD) provide important support to the domestic maritime industry, which plays an integral role in the U.S. intermodal transportation system and contributes to our national prosperity by ensuring our country's waterborne commerce is transported safely, securely, and efficiently by American workers on American vessels to benefit the U.S. economy, producers, and consumers. However, maritime has not featured as prominently as the other modes of freight transportation in previous DOT Strategic Plans. Elevating the priority level of maritime would align with the President's ambitions for a more robust American maritime industry and the goals of his *Restoring America's Maritime Dominance* executive order.

As AWO previously stated in our comments on the request for information to update the DOT National Freight Strategic Plan (DOT-OST-2025-0369), the tugboat, towboat, and barge industry – the largest segment of the U.S.-flag fleet – is already the safest, most efficient, and most environmentally friendly method of moving freight, and the only mode with the capacity to take on a significant amount of new cargo. We believe that DOT and MARAD should prioritize the identification of opportunities to move commodities by barge and shift cargo from landside modes to the waterways as a strategy to promote the efficiency and resiliency of the U.S. intermodal transportation system and strengthen the maritime industrial base. We

reiterate the following recommendations, which were included in our NFSP letter but are also relevant to the development of the larger departmental Strategic Plan, and which can guide DOT and MARAD in taking action to enhance the domestic maritime industry.

1. Create Maritime Opportunity

- a. DOT and MARAD should explore opportunities for increased maritime freight transportation in alignment with the Maritime Action Plan detailed in President Trump's Executive Order on *Restoring America's Maritime Dominance* by:
 - i. Working with regional maritime stakeholders to determine what improvements are needed (vessels, port equipment and infrastructure, etc.) to facilitate maritime transport of key commodities, especially essential energy cargoes.
 - ii. Determining whether there are any statutory or regulatory impediments at the federal or state levels to shifting cargo to the marine transportation system from landside modes.
- b. DOT and MARAD should continue to promote and advance the public benefits of maritime transportation, such as improving supply chain resilience, relieving landside congestion, and reducing air emissions by:
 - i. Promoting projects that expand the U.S. Marine Highway Program (USMHP) and benefit the surrounding communities, including leveraging opportunities available through rural and tribal transportation programs.
 - ii. Utilizing the Marine Environmental and Technical Assistance Program and the U.S. Center for Maritime Innovation to support the development and deployment of innovative maritime technologies.

2. Grow Maritime Demand

- a. DOT and MARAD should lead the public and private sectors in improving and expanding maritime transportation by:
 - i. Coordinating with other DOT modal administrations such as the Federal Highway Administration and the Federal Railroad Administration, other federal agencies, and with public and private transportation entities to explore ways to improve and expand public and private barge services; identify and promote transport of new cargoes by barge; and provide information about barge transportation opportunities to rural and tribal communities.
 - ii. Coordinating with State DOTs through the State Freight Planning process to explore additional opportunities to develop maritime highway transportation routes and services.
- b. DOT and MARAD should coordinate with other federal agencies to better integrate Marine Highway Routes into the Nation's multimodal network to ensure shippers are aware of the benefits of maritime transportation by:
 - i. Leveraging participation in the National Port Readiness Network and the U.S. Committee on the Marine Transportation System (CMTS) to identify a Strategic Marine Highway Network (SMHN) to achieve full multimodal transportation network integration.
 - ii. Working with ports to update the port infrastructure inventory list maintained by the U.S. Army Corps of Engineers and the Bureau of Transportation Statistics to

ensure that ports have the equipment and infrastructure needed to load and offload new commodity types and volumes.

- iii. Conducting a nationwide Maritime Highway Transportation study, which would include all U.S. ports and Marine Highway routes, to identify opportunities for increased maritime transport in the United States and to assist in the development of a National SMHN.
- iv. Convening major shippers with public and private maritime transportation stakeholders to identify opportunities to use maritime transportation to meet their needs.

3. Improve Intergovernmental Coordination

- a. DOT and MARAD should develop memoranda of understanding with the Department of Defense, Department of Agriculture, and other federal agencies to encourage the use of the Marine Highway System to transport federally owned, procured, financed, or generated cargo. This would generate improvements to national security and military readiness, enhancements to freight fluidities, and upgraded supply chain resilience.

4. Support Domestic Shipbuilding

- a. DOT and MARAD should ensure that any new programs to enhance American shipbuilding capacity offer support to the shipyards used to build and repair America's domestic fleet of commercial vessels. This would allow America's domestic fleet to benefit from technological advancements, workforce development, and improved supply chains that will result from investments in the maritime industrial base.

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

Sincerely,

A handwritten signature in cursive script that reads "Caitlyn E. Stewart".

Caitlyn E. Stewart
Vice President – Regulatory Affairs