November 6th, 2026

Mr. Douglas Blakemore
Chief, Bridge Administration Branch
U.S. Coast Guard Heartland District
500 Poydras Street, Room 1313
New Orleans, Louisiana 70130

Re: Drawbridge Operation Regulation; USCG-2026-0889

Dear Mr. Blakemore:

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. As the largest segment of the nation's 45,000-vessel domestic maritime fleet, our industry plays a vital part in America's supply chain and national security, moving the nation's commerce on U.S. inland and intracoastal waterways, the Atlantic, Pacific and Gulf Coasts, and the Great Lakes.

The Gulf Intracoastal Canal Association (GICA) is a 121-year-old trade association representing over 150 members throughout the 1200 miles of Gulf Intracoastal Waterway (GIWW) between Brownsville, Texas and St. Marks, Florida. GICA is committed to facilitating commerce by ensuring safe, reliable, and efficient Gulf Coast waterways.

Founded more than 75 years ago to promote the development and modernization of the Black Warrior-Tombigbee Waterway, the Warrior-Tombigbee Waterway Association (WTWA) remains a strong advocate for the safe, reliable, and efficient operation of this vital commercial navigation system. Its membership represents a broad cross-section of industries, shippers, towboat and port operators, and municipalities throughout Alabama whose economies depend on the Waterway. Together, these interests support regional economic development, domestic commerce, and international trade, generating an estimated economic impact of more than $10 billion annually for the State of Alabama.

The American Waterways Operators, The Gulf Intracoastal Canal Association, and The Warrior-Tombigbee Waterway Association, write jointly to urge the U.S. Coast Guard Heartland District to pause USCG Regulation-2026-0889 and any additional pending or future remote bridge

operation proposals within the District. We request that this pause remain in effect until bridge owners demonstrate that remote operation can be conducted safely and reliably, with clear safeguards against premature closure, and without unreasonable delays to navigation.

Our coalition is deeply concerned about the safety of remote bridge operations on Heartland District waterways. These concerns are not new. In 2022, when CSX Transportation first sought authorization to remotely operate the Bay St. Louis and Pascagoula River bridges, many of our organizations raised substantive objections and urged the Coast Guard to investigate casualties involving remotely operated bridges and to develop appropriate monitoring protocols before authorizing further remote operations. To our knowledge, those steps have not been taken, and the concerns raised four years ago remain unresolved.

Delays at movable bridges are more than an inconvenience: a delayed opening forces a towing vessel to hold position in current, tide, or wind, significantly increasing risk. Since 2022, at least two incidents involving towing vessels have resulted in damage caused by the early and unexpected closure of a draw span. An additional incident earlier this year, involving an asphalt barge and a premature bridge closure, remains under active investigation. These incidents demonstrate that the consequences of remote operation failures extend beyond delay to serious navigation safety risk.

Our coalition is not opposed to the responsible use of technology in bridge operations. We support remote operations where it can be demonstrated to provide equivalent safety and service to an on-site tender. What we cannot support is the permanent authorization of remote operation before that demonstration has been made, particularly on high-traffic commercial waterways where the margin for operational error is narrow and the consequences of failure are severe.

The members of our respective organizations operate on these waterways every day. Their safety depends on movable bridges that open safely, reliably, and on time. We respectfully urge the Heartland District to pause this proceeding and provide waterway users the assurance that remote operations will be safe before they are permanently authorized.

Please do not hesitate to contact any of the undersigned organizations if you have questions or if we can provide additional information.

Respectfully submitted,

Jill Bessetti

Jill Bessetti
Southern Region – Vice President
American Waterways Operators (AWO)

Paul Dittman

Paul Dittman
President
Gulf Intracoastal Canal Association (GICA)

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Wynne Fuller

Wynne Fuller
President
Warrior-Tombigbee Waterway Association

Enclosure (1) AWO's 2022 comment letters on USCG-2022-0298 (Pascagoula River) and USCG-2022-0299 (Bay St. Louis)

Enclosure (2) GICA's 2022 comment letters on USCG-2022-0298 (Pascagoula River) and USCG-2022-0299 (Bay St. Louis)

Enclosure (1) AWO’s 2022 comment letters on USCG-2022-0298 (Pascagoula River) and USCG-2022-0299 (Bay St. Louis)

The American Waterways Operators

47 Patricia Drive
Covington, LA 70433

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Mark A. Wright
Vice President – Southern Region

November 7, 2022

Mr. Douglas Blakemore
Chief, Bridge Administration Branch
U.S. Coast Guard, Eighth Coast Guard District
Hale Boggs Federal Building
500 Poydras Street
New Orleans, LA 70130-3310

Re: Drawbridge Operation Regulation; Bay St. Louis, Bay St. Louis, MS
(Docket No. USCG-2022-0299)

Dear Mr. Blakemore:

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 Coast Guard's issuance of the temporary deviation for how the CSX Transportation railroad drawbridge operates across Bay St. Louis.

In the notification of temporary deviation, CSX Transportation requests to operate this bridge remotely from their railroad terminal in Mobile, Alabama. AWO members have expressed safety concerns. While AWO members understand the value of technological enhancement, recent incidents have suggested that the remote operations merit greater scrutiny. There have been at least three allisions involving towing vessels and remotely operated bridges in the last year. AWO understands that all three may have involved some remote operation errors. We believe it is imperative that the U.S. Coast Guard fully investigate each incident and determine whether protocols should be developed to ensure greater risk mitigation for mariner safety before any deviation for remote operations is granted.

Our industry is concerned about the safety, environmental, and economic impacts of an increased number of remote-controlled bridge operations on U.S. navigable waterways. Since one of the Coast Guard's missions is to facilitate commerce, we believe the agency is in the best position to monitor and oversee remote-controlled operations to minimize the risk to

mariners, vessels, and commodities that move on the water. AWO requests that the Coast Guard start by developing a process to monitor these operations, inform stakeholders of the safety risks, and regulate bridge operations to minimize the risk to safe operation of vessels on navigable waterways.

Thank you again for the opportunity to comment. We look forward to continued engagement on this important navigation safety issue.

Sincerely,



Mark A. Wright
Vice President – Southern Region

The American Waterways Operators

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November 7, 2022

Mr. Douglas Blakemore
Chief, Bridge Administration Branch
U.S. Coast Guard, Eighth Coast Guard District
Hale Boggs Federal Building
500 Poydras Street
New Orleans, LA 70130-3310

Re: Drawbridge Operation Regulation;
Pascagoula River, Pascagoula, MS
(Docket No. USCG-2022-0298)

Dear Mr. Blakemore:

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 Coast Guard's issuance of the temporary deviation for how the CSX Transportation railroad drawbridge operates across the Pascagoula River.

In the notification of temporary deviation, CSX Transportation requests to operate this bridge remotely from their railroad terminal in Mobile, Alabama. AWO members have expressed safety concerns. While AWO members understand the value of technological enhancement, recent incidents have suggested that the remote operations merit greater scrutiny. There have been at least three allisions involving towing vessels and remotely operated bridges in the last year. AWO understands that all three may have involved some remote operation errors. We believe it is imperative that the U.S. Coast Guard fully investigate each incident and determine whether protocols should be developed to ensure greater risk mitigation for mariner safety before any deviation for remote operations is granted.

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Thank you again for the opportunity to comment. We look forward to continued engagement on this important navigation safety issue.

Sincerely,



Mark A. Wright
Vice President – Southern Region

Enclosure (2) GICA’s 2022 comment letters on USCG-2022-0298 (Pascagoula River) and USCG-2022-0299 (Bay St. Louis)

Gulf Intracoastal Canal Association
PO Box 2698
Covington, LA 70434
www.gicaonline.com · 985-302-6666

November 7, 2022

Mr. Douglas Blakemore -Chief, Bridge Administration Branch
U.S. Coast Guard, Eighth Coast Guard District
Hale Boggs Federal Building
500 Poydras Street
New Orleans, LA 70130-3310

Subj: Re: Docket No. USCG-2022-0298

The Gulf Intracoastal Canal Association (GICA) is a 117-year-old trade association representing over 160 member companies involved in inland towing and barge transportation, shipping, shipyards, port operations and related maritime industries which use the 1200 miles of Gulf Intracoastal Waterway (GIWW) between Brownsville, Texas and St. Marks, Florida. GICA is committed to facilitating commerce by ensuring safe, reliable, and efficient Gulf Coast waterways.

This letter is in response to Drawbridge Operation Regulation; Pascagoula River, Pascagoula, MS (Docket No. USCG-2022-0298) regarding a proposal to initiate a temporary deviation to the existing bridge operating regulations to support remote bridge operations. Several recent casualties involving inland towing vessels and remotely operated bridges over the past year on various waterways throughout the Eighth U.S. Coast Guard District have been reported and are very disconcerting.

GICA does not support any temporary deviation to the existing bridge operating regulations to support remote bridge operations until a detailed root cause analysis is conducted of each of the aforementioned casualties. The root cause analysis is needed to determine if systemic issues exist regarding remotely operated bridges which need to be addressed prior to authorizing any subsequent temporary deviations.

Thank you for your consideration. GICA looks forward to working with you and your staff in the years to come to facilitate commerce through ensuring safe, reliable and efficient Gulf coast waterways.

Sincerely

Paul Dittman
President
Gulf Intracoastal Canal Association

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November 7, 2022

Mr. Douglas Blakemore -Chief, Bridge Administration Branch
U.S. Coast Guard, Eighth Coast Guard District
Hale Boggs Federal Building
500 Poydras Street
New Orleans, LA 70130-3310

Subj: Re: Docket No. USCG-2022-0299

The Gulf Intracoastal Canal Association (GICA) is a 117-year-old trade association representing over 160 member companies involved in inland towing and barge transportation, shipping, shipyards, port operations and related maritime industries which use the 1200 miles of Gulf Intracoastal Waterway (GIWW) between Brownsville, Texas and St. Marks, Florida. GICA is committed to facilitating commerce by ensuring safe, reliable, and efficient Gulf Coast waterways.

This letter is in response to Drawbridge Operation Regulation; Bay St. Louis, MS (Docket No. USCG-2022-0299) regarding a proposal to initiate a temporary deviation to the existing bridge operating regulations to support remote bridge operations. Several recent casualties involving inland towing vessels and remotely operated bridges over the past year on various waterways throughout the Eighth U.S. Coast Guard District have been reported and are very disconcerting.

GICA does not support any temporary deviation to the existing bridge operating regulations to support remote bridge operations until a detailed root cause analysis is conducted of each of the aforementioned casualties. The root cause analysis is needed to determine if systemic issues exist regarding remotely operated bridges which need to be addressed prior to authorizing any subsequent temporary deviations.

Thank you for your consideration. GICA looks forward to working with you and your staff in the years to come to facilitate commerce through ensuring safe, reliable and efficient Gulf coast waterways.

Sincerely

Paul Dittman
President
Gulf Intracoastal Canal Association