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Caitlyn E. Stewart
Vice President – Regulatory Affairs

October 19, 2026

Mr. Nicholas Baker
Environmental Protection Specialist
Federal Aviation Administration
c/o ICF
1902 Reston Metro Plaza
Reston, VA 20190

Re: Request for Comment on the
Draft Programmatic Environmental
Assessment for Reentry Vehicle
Operations in the Marine
Environment (FAA-2026-10264)

Dear Mr. Baker:

The American Waterways Operators 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. On behalf of AWO's more than 300 member companies, we appreciate the opportunity to comment on the Federal Aviation Administration's (FAA) Draft Programmatic Environmental Assessment (PEA) for Reentry Vehicle Operations in the Marine Environment (FAA-2026-10264).

AWO supports the continued growth of commercial space operations, including the important role our members play in supporting those activities. While AWO is not currently aware of direct operational impacts on our members, we offer these comments in the interest of reducing potential future impacts.

Impacts to Maritime Traffic Need to be Thoughtfully Evaluated

The Draft PEA reflects a materially different level of analysis for aviation and maritime activity. The FAA quantifies potential effects on the National Airspace System (NAS) by ocean region, including the number of aircraft potentially affected per hour, per reentry, and annually, as well as the approximate number and types of affected air traffic control routes. The maritime discussion, by contrast, primarily describes the process for coordinating with the

Coast Guard, establishing safety hazard areas and issuing Notices to Mariners. It does not provide corresponding information about existing vessel traffic, overlap with shipping routes or fairways, or the number and types of vessels that could be affected by a representative operation.

The PEA identifies mechanisms for maintaining maritime safety during individual reentry operations, including Notices to Mariners, surveillance of designated hazard areas, and the potential establishment of Coast Guard-enforced restrictions. Although these measures explain generally how immediate risks to vessels may be managed, they do not evaluate the maritime traffic to which those measures would apply or the consequences when vessels must reroute, delay transit, or otherwise alter their operations. The PEA does not establish how frequently representative hazard areas overlap high-traffic commercial routes, how many vessels may be present, or whether practical alternative routes are available.

This gap is particularly notable because FAA's socioeconomic discussion jointly addresses the rerouting of aircraft and marine vessels and concludes that the potential socioeconomic effects would be negligible relative to other causes of rerouting. FAA recognizes that those effects would depend on aircraft or vessel type, operational flexibility, alternative routes, and scheduling constraints, but provides no vessel-traffic baseline or comparable analysis of potentially affected maritime routes.

AWO therefore recommends that, before finalizing the PEA, issuing a Finding of no Significant Impact, or establishing the proposed CATEXs, FAA complete an AIS-based assessment of maritime traffic within representative reentry hazard areas. At a minimum, the assessment should identify major shipping lanes and fairways that may overlap those areas; characterize the volume and types of vessels operating within them; estimate the number of vessels potentially affected by representative reentry operations; and evaluate the availability and operational consequences of rerouting or delaying vessel traffic. The assessment does not need to predict the precise economic effect of every future operation, but it should provide a maritime baseline and impact analysis proportionate to the PEA's evaluation of impacts to the NAS.

The CATEX's Extraordinary Circumstances Should Include Navigation Impacts

Appendix B of the PEA provides an example of what the eventual Categorical Exclusion Document Checklist could look like. As outlined, it establishes a two-part process for determining whether a future RSR operation qualifies for one of the proposed CATEXs. Part I compares the proposed operation with the scope and operating envelope analyzed in the PEA. Part II then evaluates whether an otherwise eligible operation presents extraordinary circumstances that could result in reasonably foreseeable significant effects and therefore require additional environmental review.

Part II includes 12 questions addressing matters such as protected resources, community disruption, surface transportation congestion, noise, air quality, and water quality. Item 6 asks whether the action would increase congestion from surface transportation but frames it in terms of roadway level of service and determinations by transportation agencies such as

highway agencies. It does not clearly capture the potential effects of placing a reentry hazard area over or near an established shipping lane, navigation fairway, port approach, or area of concentrated commercial vessel traffic.

This omission is important because Part II will serve as the recurring extraordinary-circumstances review for individual operations that otherwise fit within the PEA's broad geographic and operational envelope. Therefore, AWO recommends that FAA add the following question to Part II of the CATEX Checklist:

Would the proposed action, including any associated safety hazard area or vessel restriction, overlap with or materially affect an established shipping lane, navigation fairway, port approach, or area of concentrated commercial vessel traffic, potentially causing significant effects on navigation, vessel access, maritime commerce, or the marine transportation system?

For each "yes" response the FAA should require the accompanying documentation called for at the beginning of part II.

AWO also encourages FAA to ensure that the Final PEA accurately identifies the status of, and provides direct links to, each environmental assessment and associated FONSI relied upon in Appendix B.

Thank you for the opportunity to provide comments on (FAA-2026-10264). AWO would be happy to provide additional feedback or answer any questions as requested.

Sincerely,

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

Caitlyn E. Stewart
Vice President – Regulatory Affairs
The American Waterways Operators