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Jill Bessetti
Vice President – Southern Region

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Ms. Amy Hanson
Environmental Specialist, c/o ICF
Federal Aviation Administration
1902 Reston Metro Plaza
Reston, VA 20190

Re: (FAA-2024-2006) Revised Draft
Tiered Environmental Assessment for
SpaceX Starship-Super Heavy Vehicle
Increased Cadence at SpaceX Boca Chica
Launch Site in Cameron County, Texas

Dear Ms. Hanson:

The American Waterways Operators (AWO) is the tugboat, towboat, and barge industry's advocate, resource, and unified voice for safe, sustainable, and efficient transportation on America's waterways, oceans, and coasts. Our industry is the largest segment of the nation's domestic maritime fleet, supporting over 270,000 jobs and moving 665 million tons of cargo each year safely and efficiently.

On behalf of AWO's more than 300 member companies, we thank you for the opportunity to comment on the Federal Aviation Administration's (FAA) Revised Draft Tiered Environmental Assessment (EA) for SpaceX Starship-Super Heavy Vehicle Increased Cadence at SpaceX Boca Chica Launch Site in Cameron County, Texas.

The launching and landing operations discussed in the Revised Draft Tiered EA reference no new access restrictions from the Final 2022 Programmatic EA for SpaceX activity in Boca Chica, Texas. AWO appreciates SpaceX's attention to maritime vessel traffic in the Gulf of Mexico and its collaboration with the U.S. Coast Guard (USCG) to release Notice to Mariners (NOTMARs) during launching and landing operations. This partnership helps to keep mariners safe, cargo moving, and our nation's critical infrastructure secure.

Understanding the value of this collaborative effort, AWO recommends that SpaceX continue to work with the USCG and industry stakeholders to ensure that Ship Hazard Areas (SHA) issued in NOTMARs are properly marked and include any areas where potential hazards to navigation related to SpaceX launch or landing/reentry activity could impact maritime operations.

SpaceX operations in Boca Chica, Texas pose a potential hazard to maritime operations in the Gulf of Mexico including, but not limited to:

- Falling debris
- Explosive events on the water's surface
- Jettisoned heat shield related to landing/reentry activity
- Sunken obstructions to navigation

AWO recognizes that some of these potential hazards are temporary. As SpaceX tests and makes advancements in rocket design and operation, operational hazards may be reduced. However, all potential hazards to navigational safety should be addressed.

AWO appreciates the project team's work to enter into a Letter of Intent with the USCG to minimize the risk of potential hazards to maritime operations. This will ensure the continued issuance of NOTMARs, SHAs, and related notices that keep vessel operators aware of activities that could affect operations and safety. If the establishment of a Limited Access Area (LAA) is deemed necessary, we urge the project team and USCG to engage with local operators and allow for a public comment period of at least 30 days to ensure LAAs do not place unnecessarily onerous restrictions on vessel operations.

Thank you for the opportunity to comment on the FAA's Revised Draft Tiered EA for SpaceX Starship/Super Heavy Vehicle Increased Cadence at the Boca Chica Launch Site. AWO would be pleased to answer any questions or provide further information to assist in the review process.

Sincerely,



Jill Bessetti
Vice President – Southern Region