



Massachusetts Lobstermen's Association

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Submitted to: gordon.d.garrett@uscg.mil

Captain Daniel J. McQuate
Chief, Office of Navigation Systems
United States Coast Guard
2703 Martin Luther King Jr. Avenue SE
Washington, DC 20593-7418

RE: Strong Support for Retention, Maintenance, and Reliability of All Physical Aids to Navigation

Dear Captain McQuate:

On behalf of the Massachusetts Lobstermen's Association (MLA) and our approximately 1,800 members, we appreciate the opportunity to provide comments regarding the United States Coast Guard's study on reliance on physical Aids to Navigation (ATON), as required under Section 7264 of the Fiscal Year 2026 National Defense Authorization Act.

The MLA strongly supports the continued operation, maintenance, and preservation of ALL existing physical Aids to Navigation. These critical navigational resources, including buoys, channel markers, dayboards, lights, and other navigational aids, are essential to the safety, livelihoods, and daily operations of Massachusetts' commercial fishing industry.

Founded in 1963, the MLA is a member-driven organization representing approximately 1,800 fishermen and industry supporters throughout the Northeast, with members and stakeholders extending from Cape May to Atlantic Canada. Our membership represents a broad range of commercial fishing interests and includes commercial lobstermen, charter and tuna fishermen, groundfishermen, aquaculture participants, and shoreside businesses.

Commercial fishermen operate in some of the most challenging marine environments, often navigating during darkness, heavy fog, severe weather, strong currents, and rapidly changing sea conditions. Physical Aids to Navigation serve as critical reference points that fishermen have relied upon for generations to safely navigate harbors, channels, coastal waters, and offshore fishing grounds.

Every Aid to Navigation serves a purpose, and every single one is important to the commercial fishing industry. The removal, relocation, or failure to properly maintain even one navigational aid can create unnecessary risks for fishermen, their vessels, and their crews.

While modern electronic navigation systems, including GPS, radar, and electronic chart plotters, have improved maritime navigation, these technologies are not infallible. Equipment failures,

power interruptions, satellite disruptions, electronic interference, and adverse weather conditions can compromise their effectiveness. Physical Aids to Navigation provide an essential independent means of verifying vessel positions and maintaining safe navigation when electronic systems become unreliable or unavailable.

For commercial lobstermen, many of whom operate relatively small vessels and routinely depart and return to port during hours of darkness, these physical navigational references are particularly important. Fishermen depend upon the continued presence, proper positioning, visibility, and reliability of these aids to safely conduct their businesses and return home to their families.

The MLA is particularly concerned that any effort to reduce, consolidate, or eliminate physical Aids to Navigation based primarily on cost-saving considerations could have serious unintended consequences for maritime safety. The costs associated with maintaining these aids must be weighed against the potentially devastating consequences of vessel groundings, collisions, injuries, loss of life, environmental damage, and increased search and rescue operations.

Furthermore, the commercial fishing industry already faces significant economic pressures from rising operating expenses, regulatory requirements, and changing ocean conditions. Removing established navigational aids would introduce additional uncertainty and risk into an industry that cannot afford unnecessary threats to vessel safety or operational efficiency.

The MLA strongly recommends that the United States Coast Guard:

1. Retain all existing physical Aids to Navigation that support commercial fishing activities, harbor access, and safe vessel transit.
2. Ensure all navigational aids remain fully operational, properly positioned, clearly visible, and routinely maintained, with timely repairs or replacement when damaged, missing, or malfunctioning.
3. Recognize physical Aids to Navigation as essential maritime safety infrastructure, rather than viewing them as redundant because of advancements in electronic navigation.
4. Consult directly with commercial fishermen and fishing organizations before considering any removal, relocation, modification, or reduction of existing navigational aids.
5. Prioritize the safety of commercial fishermen and their crews when evaluating the costs and benefits of maintaining physical navigational infrastructure.

The MLA believes that maintaining a complete, reliable, and fully functioning network of physical Aids to Navigation is a fundamental responsibility in protecting the safety of all mariners.

Our fishermen depend on these aids every day, and their importance cannot be overstated. What may appear to be a minor navigational marker or buoy to some can represent a critical safety reference for a commercial fishing vessel operating in difficult conditions.

The MLA's position is clear: We strongly oppose the unnecessary removal or reduction of existing physical Aids to Navigation and firmly believe that each and every one must remain properly maintained, functional, and available to the commercial fishing industry.

We respectfully request that the Coast Guard and the Committee on the Marine Transportation System consider the needs and experiences of commercial fishermen when preparing this study and any subsequent recommendations.

Thank you for the opportunity to provide our comments and for your continued commitment to maritime safety. The Massachusetts Lobstermen's Association looks forward to working with the United States Coast Guard to ensure that our nation's navigational infrastructure remains safe, dependable, and fully operational for generations to come.

Sincerely,

Beth Casoni

Executive Director
Massachusetts Lobstermen's Association

cc: Gordon D. Garrett, U.S. Coast Guard