



Marine Retailers Association of the Americas

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August 10, 2022

Rear Admiral Brendan C. McPherson
Commander, USCG Seventh District
Brickell Plaza Federal Building
909 SE 1st Ave
Miami, FL 33131

RE: Marine Safety Information Bulletin (MSIB) 13-22 regarding proposed changes to the Atlantic and Gulf Seacoast System (AGSS) along the coasts of South Carolina and Georgia

Submitted via email: D07-SMB-DPWPUBLICComments@uscg.mil and
Andrew.m.engle@uscg.mil

Dear Rear Admiral McPherson,

The Marine Retailers Association of the Americas (MRAA) and the undersigned boating businesses would like to thank you for the opportunity to comment on Marine Safety Information Bulletin #13-22 regarding proposed changes to the Atlantic and Gulf Seacoast System (AGSS) along the coasts of South Carolina and Georgia. The MRAA and the undersigned businesses greatly appreciate the work done by the United States Coast Guard and recognize that you are the only Federal agency not only charged with protecting our Nation's waters but also working to facilitate maritime safety and environmental compliance.

The Marine Retailers Association of the Americas (MRAA) is the leading trade association of North American small businesses that sell and service new and pre-owned recreational boats and operate marinas, boatyards, and accessory stores. MRAA represents more than 1,300 individual member retail locations and each of our members are dedicated to safety on the water and environmental stewardship. Today the MRAA and the undersigned businesses are writing with safety concerns regarding removal of the aids to navigation along the South Carolina and Georgia coasts as put forth in MSIB #13-22.

Adequate aids to navigation are more important now than ever as we are currently seeing an unprecedented amount of new, first-time boaters, on the water. These new and inexperienced recreational users will rely on these aids to navigation for assistance when exploring an unfamiliar area or operating in low-light conditions. Furthermore, South Carolina only requires Boater Education for ages 16 below, further highlight the need for these aids to navigation, as there may be unexperienced and uneducated boaters who do not know how to use traditional charts and navigational techniques, only relying on visual aids to navigation. Lastly, adequate aids to navigation are crucial for assisting with the flow of commercial and recreational traffic and will make for an overall safer and more efficient boating experience.

The MRAA and the undersigned businesses request that the changes put forth in MSIB #13-22 be delayed until there is adequate public comment regarding the proposed changes, including a workshop or public comment meeting to overview these changes while allowing for input from relevant stakeholders and the boating community at large. If a public input session is held, the MRAA requests it be given advance notice and are invited to participate as a relevant stakeholder. Thank you in advance for your attention to these concerns. If you have any questions please do not hesitate to reach out to Chad Tokowicz, Government Relations Manager for the MRAA, at Chad@mraa.com or 978-569-5127.

Sincerely,

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