



August 3, 2026

Mr. Matthew Giacona
Acting Director
Bureau of Ocean Energy Management
Office of Strategic Policy and International Affairs
1849 C Street NW
Washington, DC 20240

Re: Docket No. BOEM-2026-0232

Dear Acting Director Giacona:

On behalf of the Commercial Space Federation (CSF), the premier trade association representing the American commercial space industry, thank you for the opportunity to comment on the Bureau of Ocean Energy Management (BOEM) Request for Information (RFI) on the Potential Use of the Outer Continental Shelf for Offshore Space Launch and Re-entry Activities. Offshore launch and reentry platforms are a promising method for expanding U.S. launch and reentry infrastructure capacity and ensure American space superiority.

As both commercial and U.S. government demand for space launch and reentry infrastructure continues to increase, it is imperative that the United States consider all options to enhance launch and reentry infrastructure capacity to meet that demand. CSF recently partnered with Rational Futures to release *Scrubbed: America's Launch Capacity Challenge*, an analysis which detailed potential U.S. launch demand and capacity under several scenarios.¹ Even under the most conservative of those scenarios outlined in the report, U.S. launch infrastructure is strained by demand, a current reality that was reflected in industry interviews as well. This year, both the National Aeronautics and Space Administration (NASA) Office of Inspector General and U.S. Space Force similarly acknowledged the need for additional space launch and reentry sites and infrastructure to meet capacity challenges.²

To address capacity constraints, American companies are currently developing offshore platforms to support orbital launches and other space activities including booster recovery and refueling. In some cases, these platforms offer distinct advantages over existing offshore infrastructure originally built for a different purpose. Mobile platforms can be repositioned for operations to and from a wide range of orbits that may not be possible from a single site. Innovations in maritime design can enhance the stability and endurance of these platforms, providing the capability required at a more efficient capital and operating cost profile. Such

¹ Commercial Space Federation and Rational Futures, *Scrubbed: America's Launch Capacity Challenge*, published May 18, 2026. Available here: https://commercialspace.org/news_events/scrubbed/.

² National Aeronautics and Space Administration Office of Inspector General, *NASA's Launch Infrastructure*, published June 22, 2026. Available here: <https://oig.nasa.gov/wp-content/uploads/2026/06/final-report-ig-26-010-nasas-launch-infrastructure.pdf?emrc=6a461199cdcf>.

systems have the dual benefit of unlocking our space industry, while also positioning the U.S. to revitalize our maritime industrial base.

The relatively remote nature of offshore platforms naturally mitigate many range safety risks and other regulatory considerations. Offshore operations limit the impact of range safety considerations such as expected casualties to the public and blast overpressure. Similarly, offshore platforms may minimize impacts to the National Airspace System (NAS) and overflight considerations. While environmental concerns still exist with offshore platforms, their mobile nature allows for placement that may ease those concerns relative to terrestrial, coastal sites that are frequently placed near environmentally sensitive regions.

Site operators must balance these advantages with the challenges associated with offshore operations. It is critically important that an offshore site be stable enough to not only handle the forces associated with space launch and reentry operations, but be able to do so under maritime conditions, including accounting for waves. The offshore location presents additional supply chain and logistical considerations as well. Payload processing and rocket integration activities would occur on land and be loaded onto the platform at port, while reentry vehicles would similarly need to be transported to the coast. Ensuring timely fueling and sufficient power is essential, and there must be measures in place to address any issues that may occur close to launch.

While the development and utilization of offshore space transportation platforms will offset some U.S. launch and reentry capacity needs, fully addressing future demand will require a holistic approach that includes additional investment and reforms to benefit traditional and new sites as well. The Federal Aviation Administration, NASA, and USSF must collaborate to expand and enhance infrastructure at existing sites to mitigate congestion and make progress on support and infrastructure of inland sites suitable for orbital launch and reentry. Federal investment is needed to enable full utilization of existing commercial spaceports and ensure a robust American spaceport network, including through appropriations and programmatic reforms to the Spaceport Transportation and Infrastructure Matching (STIM) Grant Program. Regulatory reforms to enable inland vertical orbital launch and reentry overflight of land would further alleviate capacity concerns.

It may be prudent for BOEM to consider issuing an additional RFI evaluating the end-to-end maritime space logistics ecosystem, including:

- including the movement of launch vehicles, propellants, payloads, and supporting commodities;
- the integration of sea, port, rail, and roadway infrastructure; and
- the strategic use of both the Atlantic and Pacific coasts for launch, landing, recovery, refurbishment, and recurring transportation of reusable flight hardware.

Broadening the scope of BOEM's assessment beyond offshore launch/reentry infrastructure would better inform the operations and infrastructure investments required to enable a resilient, high-cadence, fully reusable national space transportation architecture. An additional RFI should also consider maritime space operations and platforms extending beyond the Continental Shelf, as well as the full utilization of existing maritime infrastructure and established vessel operations



to support all stages of the launch lifestyle, including more efficient commodity processing practices that reduce overall intermodal transportation challenges.

Thank you for your consideration of this comment and for your attention to the potential of offshore launch and reentry sites and operations. Please do not hesitate to reach out with any questions or if you need further information.

Sincerely,

A handwritten signature in black ink, appearing to read "D. Cavossa". The signature is fluid and cursive, with a large initial "D" and a long, sweeping tail.

Dave Cavossa
President
Commercial Space Federation