



The American Waterways Operators

www.americanwaterways.com

Midcontinent Office

1113 Mississippi Avenue
Suite 108
St. Louis, MO 63104

PHONE: (314) 446-6474
CELL: (314) 308-0378
Fax: (314) 446-6479
E-MAIL: lmuench@vesselalliance.com

Lynn M. Muench
Senior Vice President - Regional Advocacy

October 8, 2014

RADM Fred M. Midgette
U.S. Coast Guard, Commander, Ninth Coast Guard District
Docket Management Facility (M-30)
U.S. Department of Transportation
1200 New Jersey Ave., SE
Washington, DC 20590-0001

Re: Regulated Navigation Area; Lake
Michigan, Chicago Harbor Lock,
Chicago, IL to Calumet Harbor,
Chicago, IL (USCG-2014-0592)

Dear RADM Midgette:

The American Waterways Operators is the national trade association for the tugboat, towboat, and barge industry. Our industry's 4,000 tugboats and towboats and more than 27,000 barges safely and efficiently move more than 800 million tons of cargo each year in the domestic commerce of the United States, including more than 60 percent of U.S. export grain, energy sources such as coal and petroleum, and other bulk commodities that are the building blocks of the U.S. economy. AWO's members account for approximately 80 percent of the barge tonnage and two-thirds of the towing vessel horsepower in this critical industry segment, moving cargoes essential to the American economy on the Pacific, Atlantic, and Gulf Coasts, the Great Lakes, and the rivers. We appreciate the opportunity to comment on the U.S. Coast Guard's proposal to establish a regulated navigation area on the waters of Lake Michigan, between Chicago Harbor Lock, Chicago, Illinois and Calumet Harbor, Chicago, Illinois, within five nautical miles from shore.

AWO supports the Coast Guard's proposal to establish an RNA from the Chicago Harbor Lock to Calumet Harbor within five nautical miles from shoreline. This action is necessary to allow tows to transit an alternate route on a portion of Lake Michigan while the Thomas J. O'Brien Lock is temporarily closed for maintenance between November 3, 2014 and March 6, 2015.

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AWO thanks the Coast Guard for proactively and cooperatively working with the towing industry and the U.S. Army Corps of Engineers to facilitate a practical solution that will allow commercial traffic to continue during the temporary closure of the Thomas J. O'Brien Lock. Since federal regulations for inspected and uninspected barges do not address this temporary alternate route, the proposed RNA is essential to facilitate commerce and establish safe operating requirements for this route.

Thank you again for the opportunity to comment. We would be pleased to answer any questions or provide further information to assist the Coast Guard on its proposal to establish an RNA.

Sincerely,

A handwritten signature in cursive script that reads "Lynn M. Muench". The signature is written in black ink and is positioned above the printed name.

Lynn M. Muench