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Mark A. Wright
Vice President – Southern Region

March 14, 2017

Mr. Mark Lahare
CEMVN-PDC-CEC
U.S. Army Corps of Engineers
New Orleans District
7400 Leake Avenue
New Orleans, LA 70160-0267

Re: Draft General Reevaluation Report
and Draft Supplemental Environmental Impact
Statement: Mississippi River, Baton Rouge to the Gulf
of Mexico, Mississippi River-Gulf Outlet, Louisiana,
New Industrial Canal Lock and Connecting Channels
Project

Dear Mr. Lahare:

The American Waterways Operators is the national trade association for the tugboat, towboat and barge industry. AWO members transport approximately 80 percent of the barge tonnage cargo and operate two-thirds of the towing vessel horsepower in this critical industry segment, moving goods essential to the American economy on the inland rivers, the Atlantic, Pacific and Gulf coasts, and the Great Lakes. Tugboats also provide essential services, including shipdocking, tanker escort and bunkering, in ports and harbors around the country. AWO appreciates the opportunity to provide comments in support of the Corps' Draft Integrated GRR/SEIS for a new Inner Harbor Navigation Canal Lock. The IHNC is a critical component of the Gulf Intracoastal Waterway and is critical to the nation's economy.

The value of this lock has been recognized by Congress for decades and across multiple administrations. The GRR/SEIS acknowledges the importance of this lock to maintaining an efficient transportation system in stating that "the IHNC Lock is the only lock that provides access to the eastern segment of the Gulf Intracoastal Waterway (GIWW) from the Mississippi River and from the GIWW to the west of the Mississippi River." The nation's economic vitality depends on the replacement of this antiquated lock with a modern shallow-draft structure.

The GRR/SEIS notes that the existing lock has long been considered dimensionally inadequate for modern towboats that often need to break with their barges and divide their tows into smaller configurations to transit the lock, causing expensive delays ultimately borne by the general public. The proposed 110-foot-wide and 900-foot-long dimension recommendation of the Tentatively Selected Plan provides transportation cost savings to the

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nation. It will also decrease the risk of collisions that could further erode the reliability of the system.

A National Waterways Foundation peer-reviewed study conducted by the University of Kentucky and the University of Tennessee concluded that the long-term closure of the GIWW would have a devastating impact on the navigation system's efficiency. This finding is reiterated in the GRR/SEIS, which states that under a no action plan "barges needing to transit the existing structure would continue to experience transit delays which average just over 16 hours. Should traffic increase, as forecasted, delays would necessarily increase accordingly." The only other marine option requires an additional 17 days transit, adding significant costs to moving goods. Further, unanticipated lock closures would result in some companies shipping their goods via alternative modes of transportation. That would negatively impact local businesses and jobs, increase congestion on roadways, increase air pollution, increase funding needed for local roads, and increase traffic fatalities. A modernized dependable lock will deter increases in shipping costs, sustain jobs and business services and protect the environment.

Replacing the current IHNC lock with a new shallow-draft structure would benefit all stakeholders in the long-term. A properly-sized lock would enable fewer trips through the structure, reducing maintenance costs. In addition, fewer trips would reduce road traffic disruptions from bridge openings. Short-term construction-related disruptions to residents could be eased by reducing the 13-year construction timeline for the project.

AWO appreciates that the GRR/SEIS recognizes the benefits of modernizing this lock and its importance in sustaining the safe movement of goods in the region and nation. We remain committed to working with government partners to advance our shared objective of enhancing the waterways to benefit the nation's economy and environment.

Sincerely,

A handwritten signature in black ink, appearing to read "Mark A. Wright". The signature is fluid and cursive, with the first name "Mark" being the most prominent.

Mark A. Wright
Vice President – Southern Region