



The American Waterways Operators

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Mark A. Wright
Vice President – Southern Region

February 18, 2015

Mr. Mark Lahare
U.S. Army Corps of Engineers, New Orleans District
Regional Planning and Environment Division,
South Coastal Environmental Compliance Section
CEMVN-PDC-CEC
PO Box 60267
New Orleans, LA 70160-0267

Re: Supplemental Environmental Impact Statement
for the Inner Harbor Navigation Canal Lock
Replacement Project, New Orleans, Louisiana

Dear Mr. Lahare:

The American Waterways Operators is the national trade association for the U.S. tugboat, towboat, and barge industry. Our industry is the largest segment of the nation's 40,000-vessel Jones Act fleet and moves more than 800 million tons of cargo each year safely and efficiently. AWO members lead the transportation and maritime industry in safety, security, and environmental stewardship. We are committed to working with government partners to advance our shared objectives.

The Inner Harbor Navigation Canal Lock is a critical component of the Gulf Intracoastal Waterway and our nation's inland waterways system. Its continued safe and reliable operation is needed to allow commerce to flow through the GIWW. The nation's economy depends on the replacement of this antiquated lock with a modern shallow draft structure.

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 greater impact on the economy than similar closures on the Western Rivers or the Columbia-Snake rivers. The IHNC Lock provides the most efficient means to move from the Western Rivers and the western section of the GIWW. The only other marine option requires an additional 17 days transit, adding significant costs to moving goods.

Since the closure of the Mississippi River Gulf Outlet (MRGO), no alternative exists that would not significantly increase the environmental and economic costs to the nation. The

IHNC Lock has been operating at the current location since 1923 and remains the best location to transit between the Mississippi River system and the GIWW.

Closing the IHNC Lock would also cause severe environmental impacts. One tank barge carries the same amount of cargo as 144 trucks. Given the number of refineries and the extensive petrochemical infrastructure along the GIWW, inhibiting navigation on the GIWW would exponentially increase highway traffic and emissions in Louisiana and along the Gulf Coast.

Replacing the current IHNC lock with a new shallow draft structure would benefit all stakeholders. A properly-sized lock would enable fewer trips through the structure, reducing maintenance costs to the nation. In addition, fewer trips would reduce traffic from bridge openings and the number of barges waiting in queue near the lock.

AWO strongly urges the Corps to consider all of these elements while conducting the SEIS. AWO stands ready to work with the Corps and other stakeholders to ensure that building a new IHNC Lock is done in a way that achieves a positive result for the nation's economy and environment.

Sincerely,

A handwritten signature in black ink, appearing to read "Mark A. Wright". The signature is written in a cursive, flowing style.

Mark A. Wright