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Thomas M. Horgan
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September 8, 2015

The Honorable Kimberly D. Bose
Secretary
Federal Energy Regulatory Commission
888 First Street, NE
Washington, D.C. 20426

Re: Notice of Preliminary Permit Application for
the Mississippi River Lock and Dam 14
Hydropower Project (FERC Project No. 13809-
002)

Dear Secretary Bose:

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 notice of preliminary permit application for the Mississippi River Lock and Dam 14 Hydropower Project.

The towing industry moved 16 million tons of product through Lock and Dam 14 in 2014, including coal, ores, and agricultural products.¹ The Upper Mississippi River is an interdependent network of locks and dams. Any disruption to navigation at Lock and Dam 14 would not only negatively impact the commodities that move through that particular lock, but the entire Mississippi River system. In 2013 alone, 676 million tons of commodities were transported on the Mississippi River system.² Approximately 60 percent of grain exports, 20 percent of oil and gasoline produced in the United States, and 20 percent of coal produced in the U.S. is moved on the Mississippi River. The Mississippi River generates more than \$200

¹ *Public Lock Commodity Report*. US Army Corps of Engineers Navigation Data Center, Calendar Years 2009-2014.

² *Waterborne Commerce of the United States, Part 5- National Summaries*. U.S. Army Corps of Engineers, Calendar Year 2013.

billion in economic output annually and more than one million jobs are dependent on the Mississippi River transportation system.³

Any hydropower project located at navigation structures on the Western Rivers must not negatively impact the movement of commerce on the nation's marine superhighway. The primacy of navigation on the Mississippi River was established by Congress with the passage of the Rivers and Harbors Act of 1930, which authorized the nine-foot navigation channel project on the Mississippi River and led directly to the construction of Mississippi River Locks and Dams 3 through 26.⁴

AWO is concerned with the location of the proposed Lock and Dam 14 Hydropower Project. This location could potentially alter river currents and negatively impact navigational safety. Specifically, AWO is concerned that turbines placed in front of or below Lock and Dam 14 could impact the flow of the river near the dam and cause safety and reliability issues for navigation as tows approach the lock. Locking through this particular lock and dam is already difficult under the current design.

AWO strongly recommends that FERC confer with the U.S. Army Corps of Engineers and the U.S. Coast Guard on the potential navigation and safety impacts of the project. AWO also recommends that FERC require an independent detailed physical hydraulic modeling study be performed by the Corps to assess the impacts before a preliminary permit is granted to the applicant, and that the findings of this modeling study be incorporated into the feasibility study required for the issuance of the permit.

In addition to flow changes, changes to pool levels will also negatively impact navigation. Guidelines and operating procedures for the project must be established stating that navigation will take precedence over hydropower production. As one of the primary authorized purposes of the Mississippi River, navigation cannot be compromised.

Thank you again for the opportunity to comment. We would be pleased to answer any questions or provide further information to assist FERC in assessing the impacts of the project.

Sincerely,



Thomas M. Horgan

cc: MG Michael C. Wehr, Commander, Mississippi Valley Division
RADM David R. Callahan, Commander, Eighth Coast Guard District

³ *The Economic Profile of the Lower Mississippi River*. Lower Mississippi Economic Conservation Committee, February 2014.

⁴ National Research Council (2001). *Inland Navigation System Planning: the Upper Mississippi River-Illinois Waterways*. Washington, DC: National Academy Press, pg. 10.