

Cost of GLMRIS Report Separation Alternatives Could Exceed \$30 Billion

On February 6, DePaul University’s Professor Joseph P. Schwieterman, Director of the Chaddock Institute for Metropolitan Development, released a [report](#) commissioned by the Illinois Chamber of Commerce Foundation urging a closer look at the costs and benefits associated with the structural alternatives explored in the U.S. Army Corps of Engineers’ Great Lakes and Mississippi River Interbasin Study Report. According to Professor Schwieterman’s assessment, the total cost of the GLMRIS Report’s structural alternatives is likely to range from \$13-\$32 billion over 50 years, more than twice the costs estimated by the Corps.

As reported in the January 14 *AWO Letter*, the GLMRIS Report presented eight alternatives for controlling the movement of aquatic invasive species between the Great Lakes and the Mississippi River basins. Six of the options are “structural” alternatives that would necessitate new construction, and four of the structural options involve the complete or partial hydrologic separation of the basins through the creation of

physical barriers at various points throughout the Chicago Area Waterways System.

Of these separation alternatives, Professor Schwieterman writes, “when all relevant factors are taken into account” – including the costs associated with environmental review and regulatory compliance, land acquisition, shifting waterborne commerce to other modes of freight transportation, and mitigating water quality impacts, which the Corps did not consider – “the necessary expected benefits...must be approximately \$2 billion per year to justify the costs.” Professor Schwieterman’s report also raises significant questions about the implementation timeframes projected by the Corps, which for the separation alternatives span 25 or more years, creating “significant uncertainty about project benefits” due to the possibility that scientific advancements will lead to a less costly control alternative, or that invasive species at high risk for transfer will move between the basins, before the separation project is completed. “The lengthy period of expenditures, with many costs being incurred several decades before [uncertain] benefits are realized, greatly hampers the economic viability of the alternatives,” Professor Schwieterman concluded.

Effects of physical separation would be felt up and down the Mississippi River.

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- Prof. Joseph P. Schwieterman, DePaul University

According to the Corps’ study of commercial vessel traffic, almost one-fourth of commodity shipments via the CAWS originate in the New Orleans area, and nearly 10 percent of the goods transported through the CAWS end up in

the Lower Mississippi and along the Gulf Coast. Professor Schwieterman highlights the heavy burden borne by vessel operators and shippers under the separation alternatives, noting that the GLMRIS Report forecasts that commercial vessel traffic along the CAWS will grow 45 percent by 2020. He estimates the cost of transferring

freight from barges to other transportation modes at \$228 million per year, including added wear-and-tear on highways, increased pollution, and added traffic safety costs.

Agreeing with Professor Schwieterman’s findings, AWO President & CEO Tom Allegretti stated that “waterborne commerce is critical to the regional and national economies. Severing the vital connection between Lake Michigan and the Mississippi River could have profound effects on the safety and efficiency of commodity movements.”

To read Professor Schwieterman’s report, click [here](#). For more information, please contact Lynn Muench at (314) 446-6474 or lmuench@vesselalliance.com, or Caitlyn Stewart at (703) 841-9300, extension 262, or cstewart@vesselalliance.com

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TSA Updates Stakeholders on OneVisit Progress

On February 13, the U.S. Transportation Security Administration briefed the TWIC Stakeholder Communication Committee on its progress in implementing the TWIC OneVisit Program. The Coast Guard and Maritime Transportation Act of 2012 required TSA to reform its process for TWIC issuance to eliminate the requirement that applicants make two trips to an enrollment center to apply for and pick up their card.



TSA discussed its December 16 expansion of the OneVisit pilot program to include enrollment centers on Michigan’s Upper Peninsula and noted that the process for TWIC enrollment and activation in Michigan is identical to the process the Administration had implemented in Alaska last June: once applicants enroll for their TWIC in person, they can choose to have it mailed to their home or pick it up at the enrollment center. If they elect to have it mailed, TSA sends a pre-activated TWIC to the individual’s residence which is ready to use immediately. In a separate mailing, TSA sends the PIN for the card. Applicants who want to create their own PIN must make a second trip to the enrollment center. TSA reports that on average, approximately 60 to 80 percent of TWIC enrollees elect to have their card mailed to their home. Between Alaska and Michigan, TSA estimates that it has mailed approximately 1,400 TWICs to residences in the last eight months.

The nationwide rollout for the OneVisit Program is currently scheduled to begin late this spring. TSA is in the late stages of transitioning all TWIC card manufacturing from U.S. Citizenship and Immigration Services to the Government Printing Office, where the process will be automated and modernized. TSA expects this work to be complete by early May, with nationwide implementation expected to begin later that month. While TSA had previously announced that the rollout would be staggered, the agency could not comment on when the OneVisit Program is scheduled to begin in each state.

AWO is working with TSA and Congress to ensure prompt and effective implementation of the OneVisit Program nationwide. For more information, please contact Brian Vahey at (703) 841-9300, extension 251, or bvahey@vesselalliance.com.

AWO Comments on Proposed Cargo Securing Requirements

In [comments](#) submitted last week, AWO urged the U.S. Coast Guard not to require SOLAS-style cargo securing requirements for barges. AWO’s comments were submitted in response to the Coast Guard’s November 15, 2013, notice of proposed rulemaking that would require vessels over 500 gross tons engaged on international voyages to have cargo securing manuals in order to align the agency’s rules with international requirements. Noting that barges traveling internationally are not subject to SOLAS requirements for cargo securing, AWO urged the Coast Guard to clarify that barges would continue to be exempt under the proposed regulations. The NPRM already exempts barges in domestic coastwise service from the requirement to have a cargo securing manual.

“Exempting non-self-propelled vessels from cargo securing requirements is appropriate because barges move many different types of cargoes internationally, from containers to roll-on/roll-off cargoes to project cargoes, frequently on the same voyage,” AWO wrote. “As a practical matter, operators would be forced to develop unique cargo securing manuals specific to each type of cargo. This would be time-consuming and expensive, and is not justified given the strong safety record of barge transportation.” AWO’s comments cited a Towing Safety Advisory Committee report that found there are extremely few incidents of cargoes lost overboard in the U.S.-flag barge industry. While the Coast Guard had used this safety record as justification for exempting barges in coastwise trade from complying with the cargo securing requirements of the NPRM, the agency was vague as to whether the same exemptions applied to barges on international voyages.

“Given the barge industry’s very low rate of cargo loss, the challenge of developing cargo securing manuals for the diversity of cargoes moved by barge, and the current SOLAS exemption for non-self-propelled vessels, AWO believes it is both appropriate and consistent with international requirements for the Coast Guard to exempt all barges in coastwise and international trade from the proposed cargo securing manual requirements. We urge the Coast Guard to explicitly state this exemption in the final rule,” AWO concluded.

For more information, please contact Brian Vahey at (703) 841-9300, extension 251, or bvahey@vesselalliance.com.

AWO Comments on Maryland Offshore Wind Proposal

On February 18, AWO submitted [comments](#) to the Bureau of Ocean Energy Management regarding the development of offshore wind energy projects off the coast of Maryland. While AWO's comments expressed support for the development of offshore wind energy, they also noted significant concerns with the current placement of the Maryland Wind Energy Area and its potential to cause

navigation safety risks. The proposed Maryland Wind Energy Area (MD WEA) is located just south of the mouth of Delaware Bay. A map of the WEA is available [here](#) and more information regarding the proposal is available [here](#).

AWO continues to work with officials from the Coast Guard, BOEM, the Maryland Department of Natural Resources and private stakeholders to address navigation safety concerns. The proposed WEA presents a threat to maritime safety because it will require slower-moving towing vessels to operate in close proximity to faster



deep-draft vessels. As proposed, the WEA will also remove a critical north-south transit lane, forcing most towing vessels to cross a traffic separation scheme at the mouth of the Delaware Bay. AWO will continue to work to ensure that preexisting vessel routes are not disrupted as offshore wind development moves forward in Maryland and nationwide.

For more information about the development of offshore wind energy on the Atlantic Coast, please contact John Harms at (703) 841-9300, extension 292, or jharms@vesselalliance.com.

EPA's 2013 VGP Webinar Recordings Available Online

The U.S. Environmental Protection Agency has posted online recordings of its webinars on issues related to the 2013 Vessel General Permit. The webinar topics and links to their recordings are listed below.

- Environmentally Acceptable Lubricants - held February 14 (click [here](#).)
- Introduction to Sampling and Self-Monitoring - held February 6 (click [here](#).)
- Introduction to the New eNOI System - held November 14, 2013 (click [here](#).)
- Overview of the 2013 VGP - held November 7, 2013 (click [here](#).)

For more information on the webinars, please contact the EPA Water Permits Division at vgp@epa.gov.

Coast Guard to Release Updated NOAD Schema in April

On January 21, the U.S. Coast Guard's National Vessel Movement Center issued a notice alerting vessel operators that on April 22, the NVMC will release an updated NOAD schema, version 3.4, which incorporates improvements in vessel response plan data reporting. Once version 3.4 is released, all previous NOAD schemas (3.2 and older) will no longer be supported. The NVMC notes that while every effort is being made to ensure that its updates are final before the April 22 implementation date, it cannot rule out the possibility that additional changes to the NOAD schema might be required. The NVMC has committed to releasing any such additions as soon as they are available.



For more information, please click [here](#) or contact Brian Vahey at (703) 841-9300, extension 251, or bvahey@vesselalliance.com.

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