



666 High Street
Suite 200-B
Worthington, Ohio 43085

PHONE: 614.565.8319
EMAIL: jlampert@americanwaterways.com

Justin L. Lampert
Manager – Midcontinent Office

January 31, 2020

Ms. Thareth Casey
Project Manager
Civil Works Program Branch
U.S. Army Corps of Engineers, Kansas City District
601 E. 12th Street
Kansas City, Missouri 64106

RE: Draft Pelican Bend Interception
Rearing Complex Project

Dear Ms. Casey,

On behalf of the American Waterways Operators (AWO), the national trade association for the tugboat, towboat and barge industry, thank you for the opportunity to comment on the U.S. Army Corps of Engineers' Draft Pelican Bend Interception Rearing Complex (IRC) Project, located in St. Louis County, Missouri.

The U.S. tugboat, towboat and barge industry is a vital segment of America's transportation system. The industry safely and efficiently moves over 760 million tons of cargo each year, 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. The fleet consists of nearly 5,500 tugboats and towboats, and over 31,000 barges. These vessels transit 25,000 miles of inland and intracoastal waterways, the Great Lakes, and the Atlantic, Pacific and Gulf coasts. Tugboats also provide essential services including ship docking, tanker escort and bunkering in ports and harbors around the country.

The tugboat, towboat and barge industry is not only an integral part of the U.S. intermodal transportation system, but also the safest, most affordable, cost-effective and most fuel-efficient, with the smallest carbon footprint of any surface transportation mode. Actions that adversely impact the efficiency of waterborne commerce, or that result in the diversion of cargo to other modes of transportation, are detrimental to the industry, the U.S. economy, public safety, and the environment.

Since 2001, AWO has been a member of the Coalition to Protect the Missouri River (CPMR), a group of stakeholders that advocate for the responsible management of Missouri River resources to ensure the maintenance of the river's Congressionally-authorized purposes, including navigation. CPMR also supports responsibly managed and properly balanced efforts to recover threatened and endangered species. In addition, AWO has been a member of the Congressionally-authorized Missouri River Recovery Implementation Committee (MRRIC)

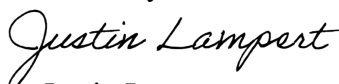
since its inception in 2008. As a result of AWO and CPMR advocacy efforts, reliable flows have returned and barge traffic on the Missouri River has been increasing steadily for more than five years.

AWO makes the following comments and recommendations on the Draft Pelican Bend IRC project:

- 1) AWO greatly appreciates the Corps' increased outreach to the towing industry as the Corps considers building additional IRCs. As the Corps is aware, the long, narrow bends on the Missouri River provide a host of challenges to navigators during normal water conditions. ***AWO strongly urges the Corps to schedule regular outreach to the towing industry as it plans future IRCs to ensure the selected sites will not jeopardize the safety of mariners or the efficient movement of waterborne commerce on the Missouri River.***
- 2) The WRDA 2018 bill prohibits the construction of additional IRCs until the Corps submits a report to Congress regarding the impacts of IRC construction on Missouri River authorized purposes, including navigation. The final report has yet to be submitted to Congress. Also, the Corps and U.S. Fish and Wildlife Service (USFWS) have yet to provide evidence that the two current constructed IRCs are effective measures to assist in the recovery of pallid sturgeon on the Missouri River. ***Therefore, the Corps should not move forward with constructing additional IRCs until the congressional moratorium is lifted and the Corps and USFWS provide scientific validation of pallid sturgeon recovery.***
- 3) AWO once again recommends that the Mississippi Valley Division Research and Development Center (ERDC) conduct comprehensive modeling of any dike designs or modifications included in the Pelican Bend IRC to better predict the impacts to navigation safety. ***Comprehensive modeling of proposed alterations to the existing structures should take place before any construction work begins for the Pelican Bend IRC.***
- 4) At a recent Pelican Bend IRC public meeting, Missouri River navigators voiced concern about deficient rock structures on Pelican Bend's left descending bank. ***AWO urges the Corps to repair these rock structures as soon as possible to support the continuity of navigation on the Missouri River.***

Again, thank you for the opportunity to provide comments on the Draft Pelican Bend IRC project. We appreciate the Corps' commitment to addressing these comments and look forward to working with the Corps to ensure that the management of the Missouri River balances the needs of the environment and the economy.

Sincerely,



Justin Lampert
Manager – Midcontinent Office