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Justin L. Lampert
Director – Midcontinent Office

July 31, 2025

Ms. Dayla Dillon
Biologist
United States Army Corps of Engineers, Chicago District
Fisheries Assessment and Monitoring Section
231 S. LaSalle Street, Suite 1500
Chicago, IL 60604-1437

RE: Notice on 30-day Scoping
Period for the Electric Dispersal
Barrier System Chicago Sanitary
and Ship Canal, Supplemental
Environmental Assessment

Dear Ms. Dillon:

The American Waterways Operators (AWO) is the tugboat, towboat, and barge industry's advocate, resource, and united voice for safe, sustainable, and efficient transportation on America's waterways, oceans, and coasts. As the largest segment of the nation's 40,000-vessel domestic maritime fleet, our industry safely and efficiently moves 665 million tons of cargo each year and enables the flow of goods through ports on the inland and intracoastal waterways; the Atlantic, Pacific and Gulf coasts; and the Great Lakes. On behalf of our more than 300 member companies, we appreciate the opportunity to comment on the United States Army Corps of Engineers' (Corps) 30-day Scoping Period for the Electric Dispersal Barrier System (EDBS) Chicago Sanitary and Ship Canal (CSSC), Will County, IL Supplemental Environmental Assessment (SEA).

The CSSC is a vital component of the Mississippi River basin system, enabling the delivery of essential commodities throughout the nation. The CSSC is a key driver of national and global economic development, and its connection to the larger Mississippi River basin and Great Lakes marks it as one of the most important transportation corridors in the United States. With this in mind, we seek to ensure that any measures implemented to prevent the spread of invasive species into the Great Lakes do not disrupt the efficiency or continuity of maritime commerce and do not threaten mariner safety. In that spirit, AWO is pleased to offer the following comments.

AWO members are committed to mitigating the spread of invasive carp populations that threaten ecosystems while also ensuring safe and efficient navigation on our navigable waterways. AWO, in collaboration with the UnLock Our Jobs (UOJ), a coalition of shippers,

carriers, passenger vessels, shipyards, contractors, and other trade associations, has worked extensively with the Rock Island District on the Brandon Road Interbasin Project, which also aims to prevent upstream movement of invasive carp. Through this process, AWO determined that acoustic deterrents and carbon dioxide infusion technologies effectively mitigate the movement of invasive carp without impacting the safe and efficient movement of waterborne commerce. However, AWO continues to strongly oppose electric barrier usage in navigable waterways as an invasive carp deterrent measure due to the hazards associated with electrified water.

The EDBS was established to prevent the spread of invasive fish species into the Great Lakes. Three separate barriers make up the EDBS, and each barrier consists of a control building that supplies electricity to steel electrodes that line the bottom of the CSSC, creating an electric current within the water. The Corps claims the purpose of the EDBS-SEA is to analyze ways to improve barrier efficacy in deterring invasive fish species while minimizing impacts to the environment. Modifications being considered include increasing the number of barriers operating at any given time, increasing voltage output when applicable, and modifying existing electrodes, though the Corps has yet to properly consider or address the dangerous conditions that electrified water poses to mariner safety.

The current electric dispersal barrier system in the CSSC near Romeoville, Illinois, is the only location on a navigable waterway where the U.S. Coast Guard will not rescue an individual who falls overboard due to electrified water. Studies conducted by the U.S. Navy confirmed a 50% fatality rate if an individual were to fall into the electrified water. Additionally, as noted in the Corps' Draft Program Management Plan promulgated in 2024, implementing electric barrier technology costs an estimated \$11.3 million per project, while other deterrents remain less costly and pose less risk to navigational and mariner safety while still effectively mitigating the spread of invasive carp. Inarguably, the safety of the mariners who navigate the CSSC should be a primary point of concern, yet AWO has yet to see the Corps properly address this critical safety matter. Considering the serious safety risks of electrified water, AWO strongly encourages the Corps to address these concerns in the EDBS-SEA and to forgo implementing or enhancing further electric barrier technology as a deterrent measure in the CSSC and in other navigable waterways.

On behalf of AWO, thank you again for the opportunity to comment on the Corps' 30-day Scoping Period for the Electric Dispersal Barrier System Chicago Sanitary and Ship Canal, Will County, IL Supplemental Environmental Assessment. We greatly appreciate the Corps' consideration of our comments and would be pleased to answer any questions or provide further information to assist in your decision-making.

Sincerely,

A handwritten signature in black ink, appearing to read "Justin Lampert", with a stylized, flowing script.

Justin Lampert
Director – Midcontinent Office