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Justin L. Lampert
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September 28, 2021

MST2 Monika Spies
Waterways Management Division
Sector Upper Mississippi River
U.S. Coast Guard

RE: Missouri River Waterways
Analysis and Management System

Dear Petty Officer Spies:

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 Missouri River Waterways Analysis and Management System (WAMS) study.

The U.S. tugboat, towboat, and barge industry is a vital segment of America's transportation system. The industry safely and efficiently moves over 665 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 6,200 tugboats and towboats, and over 33,000 barges. These vessels transit 25,000 miles of inland and intracoastal waterways; the Great Lakes; and the Atlantic, Pacific, and Gulf coasts.

Since 2001, AWO has been a member of the Coalition to Protect the Missouri River, a group of stakeholders that advocates for the responsible management of Missouri River resources to ensure the maintenance of the river's authorized purposes, including one of its two Congressionally authorized primary purposes: navigation. AWO has also been a member of the Congressionally authorized Missouri River Recovery Implementation Committee, an organization that seeks to balance the watershed's needs, since its inception in 2008.

AWO urges the Coast Guard to give navigation on the Missouri River the serious attention that it is due. The Missouri River is a critical link in the American supply chain and is relied upon to provide integrity and continuity. The U.S. Army Corps of Engineers recognizes this. The Corps has undertaken a navigation study on the Lower Missouri River to consider measures that will improve the system's functioning and reliability. The Coast Guard should align its operations on the Missouri River to match the steps taken by the Corps, Missouri River Basin states, and private industry to facilitate commerce in this region.

The Missouri River has seen an increase in commercial traffic in recent years, a trend expected to continue as new ports and terminals come online. In 2015, total tonnage on the river was around 330,000 tons and by 2020 that figure had nearly tripled, to 938,000 tons. In 2021, tonnage is expected to exceed one million tons. Multimodal operations have helped to drive this increase, as demonstrated by the recent America's Marine Highway Program project designation on the Missouri River. The Missouri Department of Transportation, along with a private partner, has been approved for a grant to establish container on barge services from Central Missouri to the Gulf Coast. Reliability, including a well-marked channel, is essential to continue this trend. We urge the Coast Guard to join other federal and state agencies in providing the support needed to facilitate the continued growth of commerce on and around the Missouri River. In particular, the Coast Guard's navigation safety mission – including reliable and timely placement of aids to navigation (AtoNs) – will be needed to support the safe expansion of Missouri River commerce.

Properly marked navigation channels are key to improving navigation on the Missouri River. Currently, traffic on the river is regularly impeded by shoaling events caused or exacerbated by federal endangered species recovery projects. Originally designed to aid in the recovery of the endangered pallid sturgeon, projects such as interception and rearing complexes and side channel chutes have diverted water from the main channel and have increased shoaling without benefiting the recovery of the species. The current problems at river mile 185 are a good example of this. Because of worsened shoaling, a low water event recently resulted in several barge groundings in the area. This has a real impact on the economic viability of the river. In 2020, tonnage from the Port of Kansas City was nearly half the previous year's level because of restricted navigation.

The Coast Guard must consider these issues specific to the Missouri River in this WAMS. Properly marking navigation channels on the Missouri River is essential to the economic growth of this waterway. AWO urges the Coast Guard to ensure that the Missouri River is properly marked at all times and managed according to its Congressionally authorized purposes, which include navigation and flood control.

AWO members have also reported AtoN needs specific to the Missouri River which the Coast Guard should be aware of when conducting this WAMS. Pilots on the Missouri rely heavily on dayboards for navigation. The Coast Guard should ensure that these AtoNs are maintained and remain standing and visible. Missouri River operators also report that undersized buoys currently used on the Missouri River are at times not visible because they are submerged underwater. This can cause problems for commercial navigators as well as recreational boaters. The Coast Guard should ensure that buoys used are adequate to conditions on the Missouri River.

With increased traffic on the Missouri River in recent years and the potential for continued growth of commerce on the river in the future, we urge the Coast Guard to ensure that the agency's plans for AtoNs meet the specific needs and challenges of the Missouri River. The safety and economic viability of the river depend on it.

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Thank you for the opportunity to comment on the WAMS. I am happy to provide additional input as the study progresses.

Sincerely,

Justin Lampert

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