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Justin L. Lampert
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December 11, 2020

Mr. BJ Murray
Illinois Department of Transportation
Hanley Building
2300 S. Dirksen Parkway
Springfield, IL 62764

Re: Draft 2020 Illinois Marine
Transportation System Plan and
Economic Analysis

Dear Mr. Murray:

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 Draft 2020 Illinois Marine Transportation System Plan (Draft IMTS Plan) and Economic Impact Analysis 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 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, and most fuel-efficient of any surface transportation mode, with the smallest carbon footprint. Actions that adversely impact the efficiency of waterborne commerce, or that result in the diversion of cargo to other modes of transportation, have negative impacts on the towing industry, the U.S. economy, public safety, and the environment.

According to the Draft IMTS Plan, Illinois's waterways are currently responsible for generating \$36 billion in economic output and providing 166,628 jobs. It is vital that Illinois

keep these waterways open, reliable, and maintained to ensure these living-wage, non-exportable jobs remain in Illinois. If the waterways were to close or lock outages were to increase, many maritime jobs would disappear, Illinois's agricultural exports would diminish, and millions of tons of freight would be shifted onto already congested highways and railroads. The IMTS Plan showcases a recognition of the importance of maintaining the waterways, ensuring reliability, and expanding the marine transportation system for the benefit of the state and the entire nation.

AWO is pleased to voice our strong support for the Illinois Department of Transportation's (IDOT) Draft IMTS Plan. IDOT's plan reflects a keen understanding of the importance and value of the marine transportation system, and AWO offers the following comments to support and strengthen the final plan:

- IDOT and the Governor's office should engage with Members of the state's Congressional delegation and encourage them to strongly champion navigation projects on the Illinois, Kaskaskia, Ohio, and Mississippi rivers and Lake Michigan. For example, expanding the length of locks from 600 feet to 1,200 feet would greatly improve navigation efficiency. A 1,200-foot lock chamber allows a 15-barge tow to transit the lock in one passage. In the Water Resources Development Act (WRDA) of 2007, lock chamber expansions were authorized for Peoria Lock and LaGrange Lock on the Illinois River and at Locks 20, 21, 22, 24, & 25 on the Mississippi River. However, the construction phase of these lock expansion projects has still not been funded. The Illinois Congressional delegation should continue to champion these improvements and ensure the construction of the 1,200-foot locks becomes a reality in the next five years.
- In the section on Lake Michigan (page 18), traffic to Northwest Indiana or Milwaukee from the Illinois waterway is not mentioned. It is unclear if this traffic is accounted for in the tonnage figures. AWO requests that IDOT ensure these figures are included in the final plan. It is critical that routes on which river barges move to Lake ports are supported.
- Recommendation #6 (page 183) mentions strengthening federal partnerships. We support and encourage IDOT to look for ways to collaborate with the U.S. Army Corps of Engineers, the Maritime Administration, and other federal agencies and identify grants that may be available from federal agencies to enhance Illinois' waterways system.
- The IMTS Plan acknowledges the threat of closing or severely restricting traffic at the Brandon Road Lock. This would severely damage the viability of the waterway system. Separating the Chicago Area Waterway System and the Great Lakes basin from the Mississippi River basin would have disastrous effects on the economy of Illinois and the rest of the nation.

- Illinois must ensure that all state sponsored waterway projects, including Brandon Road, adhere to the requirements of 615 ILCS 5, the Rivers, Lakes and Streams Act, to guarantee that the environment and efficient navigation are protected.
- AWO supports IDOT's commitment to the beneficial use of dredged material. This will allow Illinois to offset the cost of dredging in a sustainable and environmentally friendly way.
- There is concern among stakeholders that data sources on freight movement and transload facilities in Illinois contain inconsistencies and conflicting data. Given the importance of accurate data in determining state funding and strategic planning, we ask that IDOT verify that freight and port data is accurate and up to date.

The IMTS Plan foresees an efficient intermodal waterway system that will provide benefits to the barge and towing industry, its customers, ports and terminals, other transportation modes, the citizens of Illinois, the state and national economy, and the environment. Marine transportation deserves focused attention within IDOT, and the IMTS Plan's strategic direction will do just that.

Thank you again for the opportunity to provide comments on the Draft IMTS Plan. We would be pleased to answer any questions or provide further information. As part of the IMTS steering committee, AWO looks forward to continued collaboration with the agency.

Sincerely,

Justin Lampert

Justin Lampert
Manager – Midcontinent Office

CC: The Honorable Ram Villivalam
The Honorable Donald P. DeWitte
The Honorable Martin J. Moylan
The Honorable Margo McDermed