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February 5, 2021

Mr. Ryan Johnson  
U.S. Army Corps of Engineers, Chicago District  
231 South La Salle Street, Suite 1500  
Chicago, IL 60604

Re: USACE Scoping for Chicago  
Area Waterway System NEPA  
Document

Dear Mr. Johnson:

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 submit comments regarding the Scoping for Chicago Area Waterway System (CAWS) National Environmental Policy Act (NEPA) document.

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.

Twelve AWO member companies are headquartered in Illinois and over 35 member companies transit the Illinois Waterways. The CAWS is an important link for AWO members as they move freight to, from, and through Illinois' robust freight network – including the more than 17 million tons of freight that are moved on the CAWS every year<sup>1</sup>. Therefore, it is essential that the U.S Army Corps of Engineers Chicago District treats any deviation to the approved Water Control Manual at the Chicago Lock and the T.J. O'Brien Lock with great caution.

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<sup>1</sup> *Draft Illinois Marine Transportation System Plan and Economic Impact Analysis*. 2020. Illinois Department of Transportation. p. 17

If the proposed deviation could result in a permanent change to the Water Control Manual, the Corps must engage with all impacted parties to understand how those changes would impact the region. Since this notice was not published in the Federal Register, the Corps should actively reach out to all maritime stakeholders (towing companies, shipyards, terminals, ports, and marinas) that operate on or transit through the CAWS, municipalities that border the CAWS, and impacted Congressional offices. Additionally, given the erratic nature of weather events, the maritime industry would need to understand what constitutes a “severe storm event,” how far in advance water flow decisions would be announced, and who would make flow decisions before providing practical and informed comments on any Water Control Manual deviations.

With only rudimentary information, AWO has identified concerns with the navigational viability of the Calumet-Saganashkee (Cal-Sag) Channel and increased flows that could have negative impacts on safety, protection of property, transportation costs, and the environment. These initial concerns are more fully explained below.

While most of the CAWS may have ample depth to maintain an adequate navigation channel, the Cal-Sag Channel has just enough depth to maintain proper navigation at normal pool. Even if the water levels in the Cal-Sag Channel will not be lowered, we ask that the Corps study how reductions in other parts of the CAWS would impact this channel, including a side-scan survey if necessary. Reductions to the Cal-Sag Channel and the CAWS in general could lead to grounded barges and halted operations. Furthermore, if water levels on this channel were to be lowered, a minimum of 12-hours’ notice would be necessary to give operators a chance to avoid the worst impacts since transit time, both north and south bound, takes tows roughly six hours.

Industry needs to understand how flows will increase and how this may impact safe navigation. Mariners have indicated that safe navigation becomes impaired once flows go above 15,000 cfs. The increased flows would negatively impact the navigational control of tows, increasing safety and environmental concerns. In particular, grounded barges carrying hazardous cargo could damage the environment and property while putting lives at risk. If traffic through the CAWS is stopped due to flow changes or because of accidents caused by flow changes, the economic impacts would be felt from the Great Lakes to the Gulf of Mexico.

Without knowing how many times drawdowns would occur and how long each of the drawdowns would last, it is impossible to calculate the potential economic losses from this plan. However, even a single drawdown of the CAWS could cost a towing company more than \$60,000 with opportunity costs easily reaching into the six figures. Additionally, losses would be incurred beyond the towing industry. As mentioned above, to fully understand the impacts, the Corps must reach out to the entire maritime community including shippers, the impacted cities and counties, and Congressional offices.

Before deviating from the Water Control Manual at the Chicago and the T.J. O’Brien locks, the Corps’ Chicago District must do a complete analysis of all potential impacts and provide a public hearing for impacted stakeholders. This proposed deviation could prove very costly to

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towing companies that transit the CAWS, but the economic, environmental, and safety impacts would be experienced by many others across the country.

Thank you for the opportunity to share our concerns with you at this early stage of the NEPA process. We would be pleased to provide additional feedback or answer any questions.

Sincerely,

*Justin Lampert*

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