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Lynn M. Muench
Senior Vice President – Regional Advocacy

April 30, 2018

LT John Ramos
U.S. Coast Guard
Marine Safety Unit - Chicago
555 Plainfield Road, Suite A
Willowbrook, IL 60527

Re: Proposal to Amend the Regulated
Navigation Area on the Chicago Sanitary
and Ship Canal (Docket No. USCG-2017-
1095)

Dear LT Ramos:

The American Waterways Operators is the national trade association for the tugboat, towboat and barge industry. AWO's 350 member companies own and operate barges and towing vessels on the U.S. inland and intracoastal waterways; the Atlantic, Pacific and Gulf coasts; and the Great Lakes. Our industry's 5,500 towing vessels and 31,000 barges comprise the largest segment of the U.S.-flag domestic fleet. The tugboat, towboat and barge industry provide family-wage jobs and ladders of career opportunity for more than 50,000 Americans, including 38,000 positions as mariners on board our vessels, and supports more than 300,000 jobs in related industries nationwide. Each year, our vessels safely, securely and efficiently move more than 760 million tons of cargo critical to the U.S. economy, including petroleum products, chemicals, coal, grain, steel, aggregates, and containers. Tugboats also provide essential services in our nation's ports and harbors, including ship docking, tanker escort and bunkering.

On the Chicago Sanitary and Ship Canal (CSSC), several AWO companies move products throughout the Illinois Waterway System, to the Western Rivers, and to the Great Lakes, including specialized towing vessels that move river barges to and from the Great Lakes to ports, terminals, steel mills, refineries, manufacturing companies, and grain elevators in Indiana and Wisconsin. There are 40 AWO member companies that utilize and rely upon the Illinois Waterway for the livelihood of their business and their employees. As the national trade association for the companies that provide this economic engine, AWO is pleased to offer comments in support of the Coast Guard's proposed changes to the Regulated Navigation Area (RNA) on the CSSC.

AWO applauds the Coast Guard's proposal to eliminate the redundant safety zone outlined in 33 CFR 165.923(a)(1). Since vessels on the CSSC are regulated by a larger safety zone defined in 33 CFR 165.930(a)(2), removing the redundant safety zone will decrease confusion for vessel operators transiting the area.

Also, AWO greatly appreciates the removal of the bow boat requirement for all tows moving flammable liquid cargoes. Vessel operators requiring the service of a bow boat pay a flat rate of \$600 to utilize these services when transiting the RNA. These added operational costs have been a financial burden to our customers, increasing cost to consumers. The Coast Guard's proposal to eliminate the bow boat requirement will benefit the economic well-being of the towing industry, its customers, and the national economy.

Additionally, AWO applauds the Coast Guard's proposal to require all vessels to transit the RNA at a "no-wake" speed to help mitigate many of the safety risks associated with transiting the Electric Dispersal Barrier System (EDBS). Located near Romeoville, Illinois, the EDBS is the only location the Coast Guard will not rescue individuals who fall overboard due to the unsafe conditions for its highly-trained personnel. Studies conducted by the U.S. Navy confirmed a 50% fatality rate if an individual falls into the electrified water. Given the extreme dangers associated with the EDBS, towboat operators are extremely cautious when transiting the RNA. Unfortunately, towboat operators have encountered recreational vessels operating at speeds inside the RNA that pose serious safety risks to surrounding vessels and crew. By introducing a no-wake speed, all vessels will be required to transit the area in a safe and responsible manner.

Thank you for the opportunity to provide comments on the Coast Guard's proposed changes to the RNA on the CSSC. We would be happy to answer any questions or provide further information as needed.

Sincerely,

A handwritten signature in cursive script, appearing to read "Lynn M. Muench".

Lynn M. Muench
Senior Vice President – Regional Advocacy