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Justin L. Lampert
Senior Manager – Midcontinent Office

August 11, 2023

Mr. Michael Walker
Bridge Management Specialist
9th Coast Guard District (DPB)
1240 East Ninth Street
Cleveland, OH 44199-2001
Via: Michael.O.Walker2@USCG.mil

Re: Stephen Street Bike Trail Bridge, across
the Chicago Sanitary and Ship Canal, mile
26.7, at the Village of Lemont, Cook
County, Illinois
(Public Notice No. 09-02-23)

Dear Mr. Walker:

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. Our industry is the largest segment of the nation's 40,000-vessel domestic maritime fleet and moves 665 million tons of cargo each year safely and efficiently. On behalf of AWO's more than 300 member companies, we appreciate the opportunity to comment on the Coast Guard's Public Notice regarding the Stephen Street Bike Trail Bridge, across the Chicago Sanitary and Ship Canal (CSSC), mile 26.7, at the Village of Lemont in Cook County, Illinois.

The public notice states that the Lemont BNSF Railroad Bridge, east of the proposed bike trail bridge, has a vertical clearance of 19.7 feet as expressed in the 2013 Illinois Waterway Navigation Charts. To safely transit underneath this bridge, companies utilize towing vessels with retractable wheelhouses. AWO members estimate that it takes approximately 10 minutes from the point a vessel begins lowering the wheelhouse to the point the wheelhouse is then raised once the tow has cleared the bridge. While the wheelhouse is lowering or in the lowered position, the line of sight for the vessel operator is diminished. Mariners must rely on the vessel's AIS and electronic charting and navigation software to safely clear the bridge and avoid oncoming commercial traffic. However, operators are unable to see recreational vessels in front of the tow during this time because recreational vessels are not required to carry AIS, creating safety challenges for both industry and the public.

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To mitigate these safety risks, we request that the proposed bike trail bridge be constructed with the highest possible vertical clearance and a minimum of 35 feet given the width of most tows transiting the area. With a 35-foot clearance, commercial vessel operators will have a better line of sight while transiting under the bridge, increasing navigation safety and decreasing the likelihood of an allision or collision.

AWO also urges the Coast Guard to work closely with the Village of Lemont to educate the public about the importance of navigation safety to help keep our supply chain moving without jeopardizing the safety of mariners or the public. AWO previously collaborated with the Coast Guard to develop "Life Lines," a brochure that educates recreational boaters about safe interaction with towing vessels and barges on our shared waterways. Among the important details, the brochure highlights the importance of recognizing the pilot's line of sight; the deceptive nature of a vessel's slow speed; and the danger of "wheel wash." A copy of the brochure is attached, and AWO encourages the Coast Guard to widely distribute this document.

Thank you again for the opportunity to comment. We look forward to continued engagement to ensure the safety of all who utilize the CSSC.

Sincerely,

A handwritten signature in black ink, appearing to read "Justin Lampert". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Justin L. Lampert
Senior Manager – Midcontinent Office

Attachment: Life Lines. Safety Tips that Could Save Your Life.

➤ **Avoid cargo loading docks and “parked” or moored vessels in fleeting areas.** There are many loading areas, or “terminals,” along the nation’s inland and coastal waterways. Stay clear!

➤ **Wear a life jacket at all times.** Over 80 percent of those killed in boating accidents in recent years were not wearing life jackets.

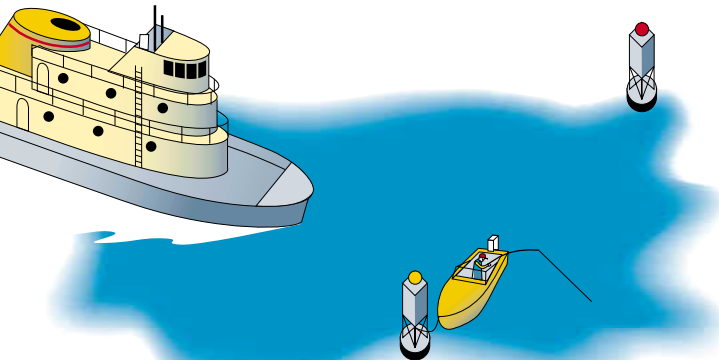
➤ **Don’t operate a boat while drinking alcohol or using drugs.**

It is estimated that more than half of all recreational boating fatalities are related to alcohol. It’s proven that the marine environment compounds the effects of alcohol.



➤ **Watch for ship, tug or towboat lighting at night** — don’t rely on trying to hear a vessel approaching. Pay attention to the sidelights of tugs and tows, rather than the masthead lights (masthead lights are not displayed by pusher towboats on the Western rivers, making it even more critical to keep a sharp lookout). If you see both sidelights (red and green), you’re dead ahead, and in the path of danger.

➤ **Use safe anchorages.** Coast Guard navigation aids, like buoys, mark channels for shipping, and it is illegal and dangerous to tie up to them. Each year commercial vessels ram and sink boats anchored in navigation channels or tied to buoys.



A CHECKLIST FOR LIFE

- ✓ **Drinking and boating are a deadly mix.**
- ✓ **Designate a lookout, particularly for commercial traffic, both day and night.**
- ✓ **Know the rules for visibility and abide by them, especially at night.**
- ✓ **Avoid ship channels. Cross them quickly.**
- ✓ **At least five or more short whistle blasts mean danger.**
- ✓ **If you have the equipment, listen to VHF channels 13 and 16.**
- ✓ **Wear a life jacket, properly fitted and fastened.**
- ✓ **Learn all the navigation rules and live by them.***

*The U.S. Coast Guard Navigation Rules are available from the U.S. Government Printing Office by calling (202) 512-1800.



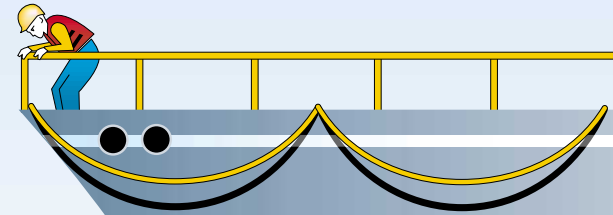
American Waterways Operators Foundation
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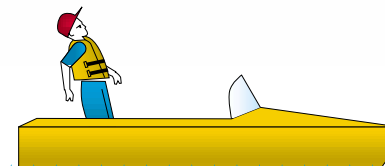
Produced under a grant from the Aquatic Resources (Wallop-Breaux) Trust Fund administered by the U.S. Coast Guard.



LIFE LINES



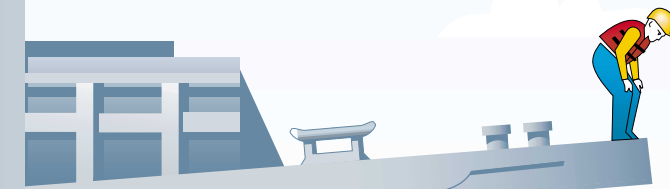
SAFETY TIPS THAT COULD SAVE YOUR LIFE



LIFE LINES

SAFETY TIPS THAT COULD SAVE YOUR LIFE

from America’s Inland and Coastal Tugboat, Towboat and Barge Operators



from America’s Inland and Coastal Tugboat, Towboat and Barge Operators



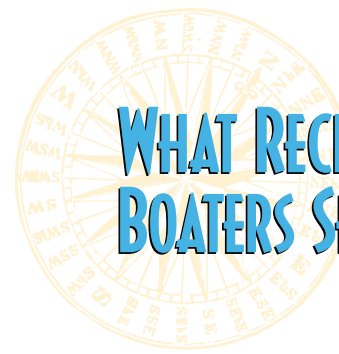
Produced under a grant from the Aquatic Resources (Wallop-Breaux) Trust Fund administered by the U.S. Coast Guard.



While our nation's inland and coastal waterways play host to thousands of recreational boats, at the same time, they also carry barges, tugboats, towboats and large ships loaded with tons of cargo.

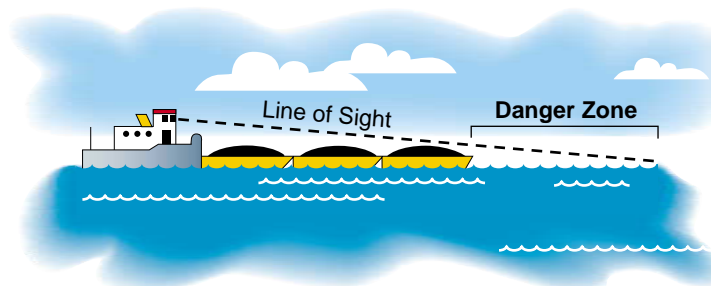
Being aware of the constraints under which these commercial vessels operate can arm recreational boaters with the best protection against danger and could save your life!

This brochure is intended only as a supplement to other sources of information on seamanship and rules of the road. It assumes that you, the boat operator, know the rules and appropriate signals. If you don't, contact the United States Coast Guard concerning boating safety training.



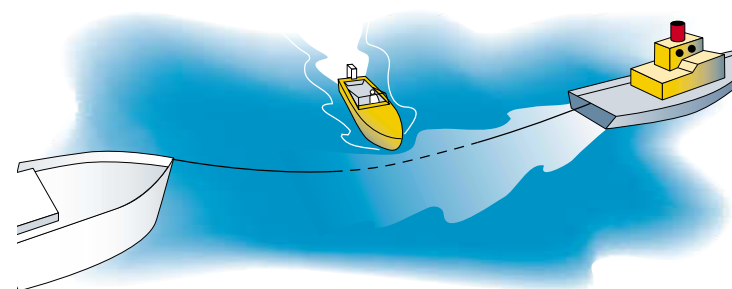
WHAT RECREATIONAL BOATERS SHOULD KNOW

- **Commercial vessels, including towboats and tugboats,** operate 365 days a year, 24 hours a day.
- **The speed of a ship, towboat or tugboat can be deceptive.** A tow can travel one mile in seven minutes—a ship even faster—and it generally takes 3/4 to 1-1/2 miles to stop. For example, if a water skier falls a thousand feet in front of a moving tug or tow, the skier has less than one minute to get out of the way.
- **Large vessels must maintain speed to steer, and they must stay in the channel**—it's the only place deep enough for them to operate. Many channels are unmarked. On some waterways, the channel extends bank to bank, so expect vessel traffic on any portion of the waterway.
- **A pilot's "blind spot" can extend for hundreds of feet** in front of tugboats and towboats pushing barges.



- **In narrow channels, a tug's or tow's powerful engines** can cause a smaller vessel to be pulled toward the tow when passing alongside.

- **"Wheel Wash" is a strong underwater current caused by towboat or ship engines** that can result in severe turbulence hundreds of yards behind a large vessel.
- **A tug without barges in front could be towing** a barge or other objects behind it on a long submerged line, which lies low in the water and is difficult to see. Never pass closely behind a tugboat.



- **Sailboating on inland rivers can be hazardous,** and sailboaters and wind surfers should know that a tow or tug can "steal your wind"—so you won't have the same wind you started with when executing a sailing maneuver near a commercial vessel.
- **Operating in adverse weather or low visibility can prove extremely dangerous.** Why take a chance?
- **Ships, towboats and tugboats use VHF radio channels 13 and 16.** If you are unsure of your situation, or their intentions, feel free to contact them. Remember, you are sharing the waterways with vessels operated by highly trained and conscientious professionals. If you have a true emergency, or need information, they can and will help if properly contacted.



WHAT RECREATIONAL BOATERS CAN DO

- **For safety, stay out of the path of towboats and barges approaching bridges and locks.** They must be lined up and committed to their approach well ahead, and it's dangerous and difficult for them to change course.
- **Designate a lookout.** Assign one person in a recreational boat to look out, particularly for commercial traffic.
- **Understand whistle signals.** At least five or more short blasts on the whistle is the "danger" signal. Stay clear of vessels sounding the "danger" signal.
- **Don't water ski or jet ski in and around tows.** That's a risk not worth taking. Jumping wakes, riding close alongside, or cutting under the bow or stern of a tug or tow could cause a boat or skier to be sucked through a towboat's large propellers.

