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June 11, 2020

Mr. Dane Morris Project Manager U.S. Army Corps of Engineers 601 East 12th Street Kansas City, MO 64106

> Re: Draft Environmental Assessment for MRRP Chute Repairs and Modifications

Dear Mr. Morris:

On behalf of The American Waterways Operators, the national trade association for the tugboat, towboat, and barge industry, thank you for the opportunity to comment on the Draft Environmental Assessment (EA) for Chute Repairs and Modifications from the 2019 Flood Damages on the Missouri River.

Since 2001, AWO has been a member of the Coalition to Protect the Missouri River (CPMR), a group of stakeholders that advocate for the responsible management of Missouri River resources to ensure the river's Congressionally authorized purposes are maintained. CPMR also supports responsibly managed and properly balanced efforts to recover threatened and endangered species. In addition, AWO has been a member of the Missouri River Recovery Implementation Committee (MRRIC) since its inception in 2008.

AWO strongly supports the Corps' proposal to repair and modify eight Missouri River Recovery Program (MRRP) shallow water-habitat chutes that received significant damage in 2019 due to unprecedented flooding. These eight chutes along with other MRRP legacy chutes have created safety challenges for Missouri River navigators for years. Repairing and modifying these chutes will ensure that towing companies can safely operate on the Missouri River.

In addition to the repairs outlined in the Draft EA, AWO encourages the Corps to repair natural chutes that continue to pose safety issues for navigators, including the Bryan Island and Car of Commerce chutes. While not part of this Draft EA, AWO would like to see repairs to control structures at both of these chutes as soon as possible to improve navigation safety and efficiency on the Missouri River. Mr. Morris June 11, 2020 Page 2

AWO greatly appreciates the Corps' outreach to the navigation community over the past few months to discuss challenges caused by MRRP legacy projects. We urge the Corps to continue this proactive and constructive dialogue to minimize the threats to maritime safety and economic impacts to the region and nation as it repairs the MRRP shallow-water habitat areas. AWO also strongly recommends a robust dialogue continue with navigators as the Corps plans and builds additional environmental structures to aid in the recovery of pallid sturgeon and other threatened/endangered species.

Thank you for the opportunity to provide comments on the Corps' Draft EA. AWO looks forward to partnering with the Corps to ensure that the management of the Missouri River balances the needs of the environment and the economy while providing reliable and safe navigation flows.

Sincerely,

Lynn M Munch

Lynn M. Muench Senior Vice President – Regional Advocacy