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Justin L. Lampert
Director – Midcontinent Office

September 6, 2024

Mr. Charles Hall
LRD Regional Technical Specialist, Environmental
Project Planning Branch
Nashville District, U.S. Army Corps of Engineers
110 9th Avenue South, Room A-405
Nashville, Tennessee 37203

RE: Notice of Availability: Section 509
Invasive Carp Program Management Plan,
Draft Programmatic Environmental
Assessment, Finding of No Significant
Impact

Dear Mr. Hall:

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, sustainably, and efficiently. On behalf of AWO's more than 300 member companies, thank you for the opportunity to comment on the U.S. Army Corps of Engineers (Corps) Draft Program Management Plan (PgMP), Draft Programmatic Environmental Assessment (PgEA), and Finding of No Significant Impact (FONSI).

The Tennessee and Cumberland River basins and the Tennessee-Tombigbee Waterway are vital segments of the Mississippi River basin system that deliver essential commodities throughout the nation. These waterways are key drivers of national and global economic development, and the locks and dams that connect them to the larger Mississippi River basin mark them as some of the most important transportation corridors in the United States, and therefore vital to our nation's prosperity¹.

AWO members are committed to mitigating the spread of invasive carp populations that threaten ecosystems while also ensuring safe and efficient navigation on our navigable

¹ [America's Watershed Initiative Report Card for the Mississippi River](#); America's Watershed Initiative (2020)

waterways. AWO, along with the UnLock Our Jobs (UOJ), a coalition of shippers, carriers, passenger vessels, shipyards, contractors, and other trade associations, has worked extensively with the Rock Island District on the Brandon Road Interbasin Project, which also aims to prevent upstream movement of invasive carp. Through this process, AWO determined that acoustic deterrents and carbon dioxide infusion technologies would mitigate the movement of invasive carp without impacting the safe and efficient movement of waterborne commerce. However, AWO continues to strongly oppose adding additional electric barriers to navigable waterways as an invasive carp deterrent measure due to the hazards associated with electrified water.

The current electric dispersal barrier system in the Chicago Sanitary and Ship Canal near Romeoville, Illinois is the only location on a navigable waterway where the U.S. Coast Guard will not rescue an individual who falls overboard due to electrified water. Studies conducted by the U.S. Navy confirmed a 50% fatality rate if an individual were to fall into the electrified water. Additionally, as noted in the PgMP, implementing electric barrier technology costs an estimated \$11.3 million per project, while the Corps' other proposed deterrents remain less costly and pose less risk to navigational and mariner safety while still effectively mitigating the spread of invasive carp. Considering the serious safety risks of electrified water, AWO strongly encourages the Corps to forgo implementing electric barrier technology as a deterrent measure in this pilot program.

On behalf of AWO, thank you again for the opportunity to comment on the Corps' proposed pilot project program designed to manage and prevent the spread of invasive carp in the Tennessee River, Cumberland River, and Tennessee-Tombigbee Waterway. We greatly appreciate the Corps' consideration of our comments and would be pleased to answer any questions or provide further information to assist in your decision-making.

Sincerely,

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

Justin Lampert
Director – Midcontinent Office