



666 High Street
Suite 200-B
Worthington, Ohio 43085

PHONE: 614.565.8319
EMAIL: jlampert@americanwaterways.com

Justin L. Lampert
Manager – Midcontinent Office

August 17, 2020

Colonel Aaron Reisinger
Commander
U.S. Army Corps of Engineers, Chicago District
231 South LaSalle St. Suite 1500
Chicago, IL 60604

RE: Chicago Area Waterways System
Dredged Material Management Plan

Dear COL Reisinger,

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 comment on the U.S. Army Corps of Engineers' final Chicago Area Waterway System (CAWS) Dredged Material Management Plan (DMMP) and Environmental Impact Statement (EIS).

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.

The tugboat, towboat, and barge industry is an integral part of the U.S. intermodal transportation system. It is not only the safest and most cost-effective transportation mode, it is also the most fuel-efficient with the smallest carbon footprint of any mode. Actions that adversely impact the efficiency of waterborne commerce, or that result in the diversion of cargo to other modes of transportation, are detrimental to the industry, the U.S. economy, public safety, and the environment.

AWO strongly supports the Recommended Plan in the DMMP which calls for the vertical expansion of the existing Chicago Area Confined Disposal Facility (CDF) to accommodate dredged material from the CAWS. Proactive dredging is critical to ensure our inland waterways are maintained to their fully authorized width and depth. As the Corps accurately explains in the Recommended Plan, the continued maintenance of the CAWS via dredging provides for the safe, reliable, and efficient movement of waterborne commerce throughout

COL Reisinger
August 17, 2020
Page 2

the nation. Expanding the CDF will ensure dredging and the disposal of dredged materials from the CAWS will continue in an environmentally safe and economically efficient manner.

Again, thank you for the opportunity to provide comments on the final CAWS DMMP and EIS. The Corps' dredging work is vital to our industry, the industries that rely on our transportation, and the entire U.S. economy. We would be pleased to answer any questions or provide further information as you see fit.

Sincerely,

Justin Lampert

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Manager – Midcontinent Office