

Thank you for your comment, Daniel Mecklenborg.

The comment tracking number that has been assigned to your comment is GLMRISANS50147.

Comment Date: February 16, 2012 16:38:56PM

GLMRISANS

Comment ID: GLMRISANS50147

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Privacy Preference: Don't withhold my personal information from the website and NEPA documents

Attachment: Ingram Barge ANS Control Comment Letter.pdf

Comment Submitted:

INGRAM BARGE COMPANY

DANIEL P. MECKLENBORG
SENIOR VP, HUMAN RESOURCES,
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February 16, 2012

VIA ELECTRONIC SUBMISSION AT:

[HTTP://GLMRIS.ANL.GOV/INVOLVE/COMMENTS/INDEX.CFM](http://GLMRIS.ANL.GOV/INVOLVE/COMMENTS/INDEX.CFM)

The Great Lakes and Mississippi River
Interbasin Study (GLMRIS) Team
111 N. Canal Suite 600
Chicago, IL 60606

Re: Comments on the GLMRIS Inventory of Available Controls for Aquatic
Nuisance Species of Concern – Chicago Area Waterway System

Dear GLMRIS Team:

On behalf of Ingram Barge Company (“Ingram Barge”), I appreciate the opportunity to submit these comments to the U.S. Army Corps of Engineers (“ACOE”) and the Great Lakes and Mississippi River Interbasin Study Team (“GLMRIS”) Aquatic Nuisance Species (“ANS”) Control Paper: *Inventory of Available Controls for Aquatic Nuisance Species of Concern – Chicago Area Waterway System*, which was published in December of 2011.

Ingram Barge is an active member of the American Waterways Operators (“AWO”), the national trade association for the U.S. tugboat, towboat and barge industry. Ingram Barge fully supports AWO’s efforts and comments on this issue, and would encourage GLMRIS and ACOE to review closely the comments submitted by AWO in this process.

Ingram Barge is a leading inland marine transportation company and has operations throughout the Western Rivers and the Gulf Intracoastal Waterways. Our corporate headquarters are in Nashville, Tennessee, and our base of operations is in Paducah, Kentucky. We operate a fleet of over 130 towboats and over 4,000 barges.

As an owner and an operator of towboats and barges that traverse the Chicago Area Waterway System (“CAWS”), Ingram Barge is very concerned about what types of controls are chosen to control the spread of ANS. We understand that this study did not evaluate the “constraints for application, regulatory requirements, technological feasibility or impacts due to application.” We support ACOE and GLMRIS as these organizations study the most effective controls for the prevention of the spread of ANS, and we urge them to review each control for its feasibility, impacts, constraints and regulatory requirements before coming to any conclusions. It is crucial

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for this process not to be rushed, but instead to be thoroughly reviewed and considered, as each possible control offers benefits and presents difficulties that should be evaluated.

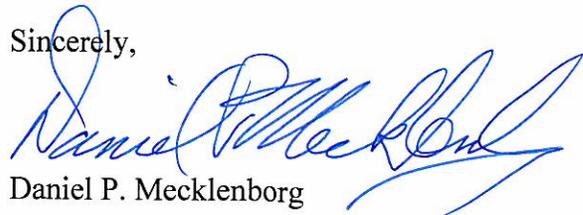
For Ingram Barge, our primary concern is that a permanent separation of the CAWS should not be the control chosen in an attempt to stop the spread of ANS into the Great Lakes or from the Great Lakes to the Mississippi River. Ingram Barge opposes the installation of a permanent barrier as a control against the spread of ANS for multiple reasons. The main reason is that a permanent barrier is not a feasible or an appropriate solution to control the spread of ANS. A permanent barrier is an extremely expensive and difficult-to-construct option to control the spread of ANS, which does not prevent the spread of ANS through the multiple pathways that surround the CAWS. Therefore, if the permanent barrier was placed in the CAWS pathway, it would not prevent the spread of ANS through the 18 other pathways, making the permanent barrier an unnecessary and a tremendously expensive undertaking that would hinder businesses and taxpayers. Additionally, the permanent barrier would greatly hinder navigation, thus hurting the businesses and companies that depend on the navigation industry to connect them to the various markets.

There are other methods suggested in the control paper that should be considered as viable options. For example, a thermal barrier would work better to control the spread of all types of ANS, without blocking traffic through the canal. Indeed, the method currently utilized, the electric barrier, is working well to keep ANS from spreading to the Great Lakes.

Ingram Barge urges GLMRIS and the ACOE to consider options other than the permanent separation of the CAWS. That is the one option that should be ranked below others as the controls for ANS are evaluated.

Thank you for reviewing these comments. If you have any questions, please do not hesitate to contact me.

Sincerely,

A handwritten signature in blue ink, appearing to read "Daniel P. Mecklenborg". The signature is fluid and cursive, with a large initial "D" and "M".

Daniel P. Mecklenborg