

Thank you for your comment, Lynn Muench.

The comment tracking number that has been assigned to your comment is GLMRISANS50166.

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GLMRISANS

Comment ID: GLMRISANS50166

First Name: Lynn

Middle Initial: M

Last Name: Muench

Organization: The American Waterways Operators

Address: 1113 Mississippi Avenue

Address 2: Suite 108

Address 3:

City: St. Louis

State: MO

Zip: 63104

Country: USA

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

Attachment: AWO Comments on ANS Control Paper.pdf

Comment Submitted:



**The American Waterways Operators**  
www.americanwaterways.com

**Midcontinent Office**  
1113 Mississippi Avenue, Suite 108  
St. Louis, MO 63104

PHONE: (314) 446-6474  
CELL: (314) 308-0378  
FAX: (314) 446-6479  
EMAIL: [lmuench@vesselalliance.com](mailto:lmuench@vesselalliance.com)

Lynn M. Muench  
Senior Vice President – Regional Advocacy

February 17, 2012

Mr. David Wethington  
GLMRIS Project Manager  
U.S. Army Corps of Engineers  
GLMRIS ANS Control Comments  
111 North Canal, Suite 600  
Chicaco, IL 60606

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

Dear Mr. Wethington:

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 Inventory of Available Controls for Aquatic Nuisance Species (ANS) of Concern – Chicago Area Waterway System (CAWS), which is an interim product of the U.S. Army Corps of Engineers' Great Lakes and Mississippi River Interbasin Study (GLMRIS).

The U.S. tugboat, towboat, and barge industry is a vital segment of America's transportation system. The industry safely and efficiently moves over 800 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 over 5,000 tugboats and towboats, and over 27,000 dry and liquid cargo 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 in ports and harbors around the country. The tugboat, towboat, and barge industry provides the nation with a safe, secure, low-cost, and *environmentally friendly means of transportation* for America's domestic commerce.

AWO's 350 member companies are proud to be part of an *industry that is the safest and most fuel-efficient, and has the smallest carbon footprint*, of any surface transportation mode. AWO is committed to building on the natural advantages of marine transportation and leading the development of higher standards of marine safety and environmental protection. In 1994, AWO became the first transportation trade association to adopt a code of safe practice and environmental stewardship for member companies. Today, compliance with the AWO Responsible Carrier Program is a condition of membership in AWO, and all members are

required to undergo a third-party audit verifying their compliance within one year of joining the association. Re-audits are required every three years thereafter.

This history and these organizational characteristics inform our view of GLMRIS. We seek options and technologies to prevent the spread of ANS between the Great Lakes and the Mississippi River system that protect the environment in which our vessels operate, allow for the continued safe and efficient movement of essential maritime commerce, and ensure that cargo is not diverted to other transportation modes that pose increased risks to safety and the environment.

AWO appreciates the Corps' effort to identify available options and technologies, or controls, which may be implemented in the CAWS to prevent the transfer of ANS. We understand that the inventory of available ANS controls does not thoroughly evaluate each control's "constraints for application, regulatory requirements, technological feasibility or impacts due to application," nor does it rank their effectiveness. However, we would like to make the following recommendations to the GLMRIS Team as it begins to develop screening criteria and formulate and evaluate alternatives comprised of one or more of the available controls.

AWO believes that the number and diversity of ANS controls identified by the Tech Team affirms the achievability of selecting preferred alternatives that effectively prevent the transfer of ANS while protecting the movement of waterborne commerce. The majority of listed controls can be applied in the CAWS without significant disruptions to commercial vessel traffic.

Therefore, **AWO strongly urges the Corps to include negative impacts to navigation, as well as other uses of the CAWS such as recreation, water quality, and flood control, as screening criteria for use in its determination of which controls warrant further consideration.** This is entirely consistent with GLMRIS objectives to study the feasibility of the range of options and technologies available to prevent ANS transfer. Controls that impair or eliminate the movement of critical commodities along the CAWS, which generates billions of dollars for the U.S. economy annually, cannot and should not be considered feasible alternatives.

In particular, AWO believes any control that prevents ANS transfer by modifying the flow conditions of the CAWS, including accelerated water velocity, hydrologic separation, and vertical drop barrier, is likely to substantially affect the safe and efficient operation of vessels through the waterway system. There are other available controls, such as lethal water temperature, which appear to be highly effective at targeting multiple organisms of concern in the CAWS and would not result in the long-term interruption or cessation of waterways transportation.

**AWO also recommends that the Corps screen the available options and technologies based on their implementation costs, including research and development, permitting, construction, and operation and maintenance costs.** Controls that would cost more money to implement than the Corps can reasonably expect to be available are not feasible. The Corps' resources would be better spent on further consideration of practicable alternatives, as opposed to the study of alternatives that ultimately will not be employed in the CAWS due to their high and unrealistic costs.

Mr. David Wethington

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We understand that the Corps is statutorily obligated to explore the full range of available controls. However, we encourage the Corps to fully evaluate and consider the negative impacts, including those on vessel traffic, and the costs consequent from the application of each control when screening available controls and formulating and evaluating alternatives.

Thank you again for the opportunity to comment on the ANS control paper. We would be pleased to answer any questions or provide further information as the Corps sees fit.

Sincerely,

A handwritten signature in cursive script that reads "Lynn M. Muench". The signature is written in black ink and is positioned above the printed name.

Lynn M. Muench