

Thank you for your comment, Edmund Welch.

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GLMRIS

Comment ID: GLMRIS50613

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Attachment: pva to usace re glmris 3-31-11.pdf

Comment Submitted:

Please accept the attached comments on GLMRIS from the Passenger Vessel Association



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March 31, 2011

Mr. David Wethington  
Project Officer  
Chicago District, U.S. Army Corps of Engineers  
111 North Canal Street, Suite 600  
Chicago, IL 60606

Dear Mr. Wethington:

Thank you for this opportunity to provide input on the Great Lakes and Mississippi River Interbasin Study (GLMRIS).

The Passenger Vessel Association (PVA) is the national trade association for owners and operators of commercial U.S.-flagged passenger vessels of all types. PVA currently has more than 550 vessel and associate members. Its members own and operate dinner cruise vessels, sightseeing and excursion vessels, passenger and vehicular ferries, private charter vessels, whalewatching and eco-tour operators, windjammers, gaming vessels, amphibious vessels, water taxis, and overnight cruise ships. The diverse membership of PVA includes small family businesses with a single boat, companies with several large vessels in different locations, and governmental agencies operating ferries. PVA's associate members are key suppliers to the passenger vessel industry, including marine architects, vessel builders and decorators, insurance companies, publishers, food supply companies, computer software and ticketing vendors, marine equipment suppliers, engine manufacturers, and others.

PVA's membership includes companies that operate tour, sightseeing, and overnight cruise vessels on the navigable waters and through the navigation locks of the Chicago Area Waterways System.

GLMRIS was authorized by the Water Resources Development Act of 2007 (Public Law 110-114). Section 3601 of that law states, "(d) FEASIBILITY STUDY. – The Secretary, in consultation with appropriate Federal, State, local and nongovernmental entities, shall conduct, at Federal expense, a feasibility study of the range of options and technologies available to prevent the spread of aquatic nuisance species between the Great Lakes and Mississippi River Basins through the Chicago Sanitary and Ship Canal and other aquatic pathways."

Since early winter 2009, heated controversy has occurred about the Chicago Area Waterways System (CAWS) and its relation to the possible spread of the invasive Asian Carp up the Mississippi/Illinois river systems toward Lake Michigan. Some have called for the immediate closure of navigation locks located on the CAWS. Lawsuits have been filed in federal court, with the U.S. Supreme Court becoming involved. Bills have been introduced in Congress, and the U.S. House of Representatives recently rejected the Camp amendment to prohibit federal funding to operate locks on the CAWS by a decisive roll call vote. The President has appointed an Asian Carp "czar." Numerous federal agencies, including the U.S.

Army Corps of Engineers, and state agencies have undertaken various Asian Carp control and prevention measures, including operation of and enhancements to the “Electric Barriers.” Various sampling measures have been undertaken, including a massive deliberate fish kill in a portion of the CAWS in a futile attempt to locate Asian Carp.

It is inevitable that the Asian Carp controversy is to become addressed in the GLMRIS, but it is important that the scope of the GLMRIS not be restricted to the Asian Carp issue or to the operation of the CAWS. The law directs the study to examine “aquatic nuisance species” of all types, not solely the Asian Carp. As noted on page 1 of the Project Management Plan (November 2010) (PMP), the federal statutory definition of the term “aquatic nuisance species” is quite broad; in no way can it be construed to apply to Asian Carp only. Also, the law requires study of various aquatic pathways, not of the CAWS alone. The law authorizes study of movements of species from the Mississippi River Basins to the Great Lakes, but also from the Great Lakes to the Mississippi River Basins.

The PMP states that hydrological separation is a technique to be examined, but this should be only one of various control measures studied. GLMRIS should not allow its scope to be impermissibly limited to possible closure of the CAWS and its navigation locks. PVA urges that GLMRIS examine other more effective, less economically destructive measures to prevent Asian Carp and other aquatic nuisance species from entering Lake Michigan.

In characterizing the role of the CAWS on the region’s economy, GLMRIS must take note that members of the Passenger Vessel Association in the Chicago area operate vessel tours and charters that move through the Chicago River Controlling Works lock connecting Lake Michigan and the Chicago River, These companies include:

Chicago Cruises (Great Lakes Development LLC) ([www.chicagocruises.com](http://www.chicagocruises.com));

Chicago’s First Lady Cruises ([www.cruisechicago.com](http://www.cruisechicago.com));

Chicago from the Lake, Ltd. ([www.chicagoline.com](http://www.chicagoline.com));

Mercury Sightseeing Boats ([www.cruisechicago.com](http://www.cruisechicago.com));

Shoreline Marine Company ([www.shorelinesightseeing.com](http://www.shorelinesightseeing.com)); and

Wendela Sightseeing Boats ([www.wendellaboats.com](http://www.wendellaboats.com)) .

These PVA operators offer the famous boat tours to showcase Chicago’s architecture. Should the lock be closed, each would be prevented from providing lake-to-river and river-to-lake excursions, upon which their businesses rely. For Chicago vessel companies and their hundreds of employees, lock closure would be economically injurious or completely crippling. A vibrant, successful part of Chicago’s tourism industry would be tossed aside.

In 2009, PVA member companies operated at least 36 vessels with a combined passenger capacity of 4,115 that passed through the Chicago River lock. Their vessels carried at least 691,674 passengers and made at least 7,790 transits through the lock in 2009. These PVA members employed at least 604 workers in high-quality, good-paying jobs and had an annual

payroll of at least \$7,033,396. Tens of millions of dollars of investment assets and resources are at risk if the passenger vessels cannot be employed in their normal income-producing activity.

Also, Blount Small Ship Adventures ([www.blountsmallshipadventures.com](http://www.blountsmallshipadventures.com)) of Warren, RI, operates a “small ship” overnight cruise vessel (the *Niagara Prince*) that transits the O’Brien lock several times a year as part of its Lake Michigan-to-New Orleans voyages. This company is also a PVA member.

Page 2 of the PMP states that a GLMRIS objective is to “identify and engage interested stakeholders.” Each of the seven companies specified above, as well as the Passenger Vessel Association itself, is an interested stakeholder and should be fully consulted by the Army Corps of Engineers as GLMRIS proceeds.

Table 1 of the PMP (pages 10-11) outlines components of the “Inventory of Historic and Existing Conditions by Functional Teams.” PVA makes these observations about Table 1:

- Under “Navigation and Economics,” there should be a separate line devoted to “commercial passenger vessels.” They should not be lumped together with “recreational navigation” as is currently the case. The term “commercial passenger vessels” should be used rather than the more limited term “tour boats.” Operating a vessel to carry passengers for hire as part of a sightseeing, dining, or overnight cruise is a business, not a recreational activity, and should be treated as commercial navigation, just as is the transportation by water of freight for hire.
- The analysis of commercial passenger navigation must be expanded beyond the “income generated” and the “average cost per trip.” It should quantify: existing investments in capital and shoreside facilities; employment impacts, including number of employees and salaries paid; value of businesses; contribution to the local tourism economy; and an estimation of the economic value of related businesses (a factor to be estimated for the commercial fisheries, sport fisheries, and hydropower sectors, according to Table 1). PVA also suggests that the analysis of commercial freight transportation also be broadened to include similar factors.

Page 25 of Appendix 2 provides a short description of the work needed to characterize commercial passenger navigation. As indicated previously in this comment, this characterization should be broadened to include: existing investments in capital and shoreside facilities; employment impacts, including number of employees and salaries paid; value of businesses; contribution to the local tourism economy; and an estimation of the economic value of related businesses.

PVA is concerned that the budget chart on page 26 of Appendix 2 contains no funding for conducting the economic characterization of the commercial passenger vessel sector. In contrast, the sums of \$100,000, \$50,000, \$40,000, and \$50,000 is estimated for conducting similar work for commercial cargo, recreational navigation, commercial fisheries, and recreational fisheries respectively. Is this an indication that the Army Corps of Engineers does not fully appreciate that commercial passenger navigation in the CAWS is a valuable economic activity? The chart should be revised to include an appropriate estimated sum for conducting the economic characterization of the commercial passenger navigation sector.

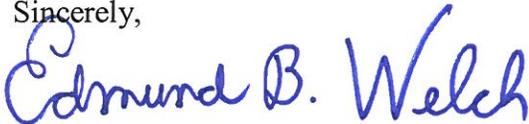
Also, on page 42 of Appendix 2, the “Commercial and Recreational Navigation” paragraph should be revised. The study of impacts of alternative plans on navigation users should be broadened to consider impacts on their customers and the regional economy.

Amendment F to the PMP, under the navigation section, fails to specify that there should be evaluation criteria for commercial navigation (including commercial passenger vessel navigation) benefits, just as there are for recreational navigation benefits.

PVA agrees with the commitment (page 18 of the PMP) to use various modes to promote stakeholder participation. However, PVA requests that it be appointed to be a part of the Executive Steering Committee (ESC), along with other commercial navigation stakeholders. ESC meetings should be open for the public to attend, and its record and minutes should be available in a timely manner.

PVA appreciates this opportunity to submit comments on the GLMRIS. We look forward to working with the Army Corps of Engineers and other participants as this effort goes forward.

Sincerely,



Edmund B. Welch  
Legislative Director