

Mark Lahare
CEMVN-PDC-CEC
7400 Leake Ave.
New Orleans, LA 70118

Re: Draft General Reevaluation Report and Draft Supplemental Environmental Impact Statement
Mississippi River, Baton Rouge to the Gulf of Mexico Mississippi River-Gulf Outlet, Louisiana, New
Industrial Canal Lock and Connecting Channels Project

Dear Mr. Lahare:

The Gulf Intracoastal Canal Association (GICA) is a 111-year-old trade association representing 200 industry members involved in towboat and barge operations, shipping, shipyards and associated waterways industries which use the Gulf Intracoastal Waterway (GIWW) between Brownsville, Texas and St. Marks, Florida. GICA strives to facilitate commerce through ensuring safe, reliable and efficient Gulf Coast waterways.

I am writing to offer comments on, and support for, the Corps' January 2017 Draft Integrated GRR/SEIS for a new Industrial Canal Lock. A shallow draft replacement IHNC Lock structure is extremely important to our members. The present lock is a critical component of the GIWW and of our nation's inland waterways system. Its continued safe and reliable operation is needed to allow commerce to efficiently flow east and west along the GIWW.

GICA and its members are pleased with the conclusion and recommendations of the reports and supports the Tentatively Selected Plan. As the Draft Integrated GRR/SEIS has concluded, replacing the present structure with a larger and modern lock design will improve the reliability, efficiency and safety of barge transport through the industrial canal. Further, the smaller footprint of the shallow draft lock, while still beneficial to the barge industry, results in less of an impact on the immediate community than the previously considered deep draft alternative.

Reliable operations at a new lock will help us avoid the impacts of delays due to unanticipated lock closures (and for extended repairs or maintenance). Additionally, reliable lock operations help to ensure jobs and businesses in the New Orleans area will stay there. For instance, when the lock was closed last fall for gate and machinery work, some shippers opted to shift to rail and truck transportation modes. This meant a loss of business and a loss of local jobs. A reliable, modern lock will decrease overall costs of shipping by barge and return business and jobs to the area. It will also decrease congestion on local roadways.

Improved **efficiency** at the larger lock will eliminate much of the wait as a typical six-pack tow can lock without time consuming and expensive tripping. Fewer trippings will result in measurable reductions of bridge openings (and resultant traffic backups), noise, and disruptions associated with tows waiting to lock. Additionally, with fewer towboats idling at their moorings awaiting lockage and fewer automobiles idling during bridge openings, air quality improvements will be realized. This should result in a *positive* change for the immediate IHNC neighborhood.

A larger, modern lock will be **safer** for the mariners who routinely transit this area and, ultimately, for neighborhood residents. The risk of error when pushing tons of cargo in 200 or 300 foot long barges is greatly decreased when the width and length of the lock chamber is expanded to the recommended 110 feet wide and 900 feet long. This would mean fewer allisions with the lock structure and fewer towboat and barge collisions. The risk of a hazardous cargo release will be reduced. Direct costs to USACE (O&M) and mariners for repairing damaged pilings, fenderworks and gates would decrease.

GICA and its nearly 200 member companies certainly understand the concerns and reservations of the local neighborhood population in the vicinity of the IHNC Lock. Some 75 GICA member companies, (consisting of barge owners, shippers, towboat operators, ship yards, suppliers, fleet operators and more) call Louisiana home; and at least 25 of those are located in the greater New Orleans area. Our companies' employees and their families live in affected neighborhoods, pay city, parish and state taxes, and share in the economies of New Orleans and Louisiana. One measure we believe could be employed to limit the construction related disruptions to the community would be to execute this project in less than the 13 years proposed. Based on the Corps' success in completing other projects in the area on an expedited basis, we recommend the timeline for this project be expedited to limit impacts and built in the minimum time reasonably necessary to safely and efficiently complete the job.

Thank you for considering these and previous GICA comments on this project. GICA and its members stand ready to assist as the Corps embarks on this effort.

Sincerely,

Jim Stark,
President