



July 29, 2020

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Designated Federal Officer
Civil Works Infrastructure Team
441 G Street NW
Washington, DC 20314

Dear Civil Works Infrastructure Team,

Following the July 29th Civil Works Infrastructure virtual meeting, IRPT would like to submit feedback as requested and circulated. IRPT advocates this stronger support of the inland waterways since the economic development along those inland waterways, i.e. the commercially navigable rivers, could not be created by any other means than via our ports and terminals along those waterways.

There has been a growing concern over Levels of Service being imposed on several river systems such as the Atchafalaya, Missouri, Kaskaskia, Ouachita, Kanawha, etc. The Corps. classifies these as “low use” rivers, of which more than half of the total inland river system is comprised of, because of the amount of tonnage being moved on the system. I would like to first suggest that another terminology that does not have such a negative connotation be used such as “critical link rivers.” While the tonnage may be lower than other river systems across the nation, their impact to the communities and regions they serve is tremendous. We should be looking for ways to help stimulate the economies in these rural areas, not decrease their access to lower transportation costs. A number of these same areas are being incentivized with opportunity zones to help with economic development and job creation. By imposing levels of service, the use of these navigation systems will continue to decline and could eventually close due to the unreliability of these systems. It certainly does not garner confidence by industries looking to locate by an inland river to take advantage of lower transportation costs.

In some cases, “low use” occurs because of weather events, scheduled and unscheduled lock maintenance and lock construction. In the case of the Missouri River, there are no locks to gather tonnage data and the Corps has suggested using AIS. The problem with this is that AIS can monitor a towboat’s movements, but it cannot track the number of barges and/or what is in the barge. This is gathered by Vessel Operating Records that industry is tasked to submit, but there is no guaranty that all industries are reporting or reporting accurately.

In 2012, while I was the Waterways Branch Manager for the Oklahoma Department of Transportation, when the Arkansas River or McClellan-Kerr Arkansas River Navigation System had LOS imposed on 5 of the 18 locks at the head of the navigation system because there were less than 1,000 gate swings for commercial use on those locks. At the time, we were a moderate use river. We were able to get the Levels of Service lifted through a commonsense approach of taking all the lockages for the entire system and dividing that by the number of locks along the system. We were also supported by our U.S. Congressional Delegation in getting LOS lifted. It was only a few years later that the MKARNS was designated as a “High Use” River. This would not have happened if LOS had remained in place.

Elimination or reduction of lock service ultimately has both a direct and indirect impact on these communities such as loss of industries, loss of jobs, reduction of a community's tax base, an increase in unemployment costs, increase of transportation costs, increase of infrastructure costs on surface transportation such as roads and bridges, traffic safety concerns, and regional economic decline.

Consideration should also be given to the amount of private investment that has been made along these "low use" river systems, as well as the initial cost constructing them.

Suggested Alternatives to the LOS System include

- A cost/benefit analysis that considers the true impact on the Nation when evaluating lock operations on lower-use rivers
- An updated study of LOS guidelines and system metrics
- Alternate lock management models
- Remote operated locks

Inland Marine Highways, that is, the inland rivers, move commerce to and from 38 states throughout our nation's heartland; they serve as transport ramps to industrial and agricultural centers; and they facilitate imports and exports at gateway ports on the Coasts. Our nation's rivers deliver vital goods between major gateway ports, establish new trade networks with significant public benefits and create a foundation for future trade growth.

IRPT is a non-profit trade association with over 300 members nationwide. IRPT advocates for the inland waterways, industries and companies that serve and utilize our inland rivers, ports and terminals. IRPT promotes the use of our nation's rivers as the most cost effective, and environmentally-friendly form of transportation. Our Members consist of public ports, private terminals, barge and rail operators, waterway associations, shippers and firms.

IRPT truly thanks you for your focused attention on freight transportation and the challenges and opportunities for improving infrastructure conditions and freight mobility on the waterborne transportation system.

Sincerely,

Dede Smith
Deputy Director