



**The American Waterways Operators**

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Lynn M. Muench  
Senior Vice President - Regional Advocacy

August 25, 2014

Mr. F.J. Sturm  
Acting Director of Commercial Regulations and Standards  
U.S. Coast Guard  
Docket Management Facility (M-30)  
U.S. Department of Transportation  
1200 New Jersey Ave., SE  
Washington, DC 20590-0001

Re: Petition for Rulemaking: Special  
Load Line Exemption for Lake Michigan  
(USCG-2013-0954)

Dear Mr. Sturm:

The American Waterways Operators is the national trade association for the tugboat, towboat, and barge industry. Our industry's 4,000 tugboats and towboats and more than 27,000 barges safely and efficiently move more than 800 million tons of cargo each year in the domestic commerce of the United States, 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. AWO's members account for approximately 80 percent of the barge tonnage and two-thirds of the towing vessel horsepower in this critical industry segment, moving cargoes essential to the American economy on the Pacific, Atlantic, and Gulf Coasts, the Great Lakes, and the rivers. We appreciate the opportunity to comment on establishing a conditional load line exemption for non-load line river barges to operate along Lake Michigan's eastern shore, between Chicago (Calumet), IL and Muskegon, MI.

The U.S. tugboat, towboat, and barge industry is the nation's safest, most environmentally friendly and most economical mode of freight transportation. AWO members are committed to leading the transportation industry in safety and environmental stewardship. AWO is generally supportive of load line exemptions that safely enhance commerce between the Great Lakes and the Western Rivers; however, collaboration with the industry to conduct a thorough analysis of the safety implications must first be conducted before an exemption is established.

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It is from this perspective that we urge the Coast Guard to establish a Risk Assessment Work Group to determine whether non-load line river barges can safely operate between Chicago (Calumet), IL and Muskegon, MI, as was done previously for the route from Calumet to Milwaukee, WI. This group should be comprised of knowledgeable parties representing towboat and barge operators, port authorities, the Coast Guard, the U.S. Maritime Administration, and port-related businesses, such as terminal operators and shippers. The work group should take into consideration safety issues including but not limited to weather, and the number and locator of harbors of safe refuge with capacity to handle the increased barge traffic.

If the Risk Assessment Work Group determines that non-load line river barges can safely traverse the route from Calumet to Muskegon, AWO believes this route would provide a cost-effective means to ship raw materials integral to industry, particularly fertilizer and exports needed to enhance the profitability of the agriculture industry in Michigan.

Thank you again for the opportunity to comment. We would be pleased to answer any questions or provide further information to assist the Coast Guard in its decision on whether to establish a load line exemption for non-load line river barges between Calumet and Muskegon.

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