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Jill Bessetti
Vice President – Southern Region

October 17, 2024

Mr. Victor Vourcos
Project Manager
Corpus Christi District Office
Texas Department of Transportation
1701 S. Padre Island Dr.
Corpus Christi, Texas 78416

Re: Notice of intent to prepare an
Environmental Impact Statement;
Regional Parkway-North Padre Island
transportation project

Dear Mr. Vourcos:

The American Waterways Operators (AWO) is the tugboat, towboat, and barge industry's advocate, resource, and unified voice for safe, sustainable, and efficient transportation on America's waterways, oceans, and coasts. Our industry is the largest segment of the nation's domestic maritime fleet, supporting over 270,000 jobs and moving 665 million tons of cargo each year safely and efficiently. On behalf of AWO's more than 300 member companies, we thank you for the opportunity to comment on the Texas Department of Transportation (TxDOT) Notice of Intent to prepare an Environmental Impact Statement (EIS) for the Regional Parkway-North Padre Island transportation project.

Our nation's inland waterway system keeps the U.S. and Texas economy running by transporting cargo safely and efficiently. The 1,300-mile Gulf Intracoastal Waterway is a vital part of this system, linking Brownsville, Texas to St. Marks, Florida. Barge transportation is the safest and most efficient mode of freight transportation, with rail emitting 43% more greenhouse gas emissions compared to barge transportation and trucks emitting over 800% more. Also, barge transportation has the best safety record in the transportation industry, with a fatality rate 26 times lower than freight rail and 120 times lower than freight truck transportation. In 2022, 80 million tons of cargo was moved on the Texas section of the Gulf Intracoastal Waterway alone, contributing \$77 billion in annual economic impact in the state¹.

¹ *Gulf Intracoastal Waterway*. Texas Department of Transportation. (n.d.).
<https://www.txdot.gov/projects/planning/gulf-intracoastal-waterway.html>

We strongly encourage the study to consider all the impacts an additional crossing through Laguna Madre would have on vessel navigation on the Gulf Intracoastal Waterway. Given the potential proximity to the existing crossing, we recommend the EIS evaluate how an additional obstruction across the navigational channel would impact vessel navigation through multiple bridge spans with special emphasis on vertical and horizontal navigational clearances. In order to effectively operationalize this impact, TxDOT should consult with local vessel operators, Coast Guard officials, and trade associations like AWO to ensure a comprehensive review of navigational impacts.

Thank you for the opportunity to comment on the TxDOT's Notice of Intent to prepare an EIS for the Regional Parkway-North Padre Island transportation project. AWO would be pleased to answer any questions or provide further information to assist in the review process.

Sincerely,

A handwritten signature in black ink, appearing to read "Jill Bessetti". The signature is fluid and cursive, with a prominent initial "J" and a long, sweeping underline.

Jill Bessetti
Vice President – Southern Region