December 1, 2017

USACE Chicago District
ATTN: GLMRIS-Brandon Road Comments
231 S. LaSalle Street, Suite 1500
Chicago, IL 60604

To Whom It May Concern:

Thank you for the extension of the public comment period to permit review of the study and recommendations relative to the Brandon Road Lock south of Chicago, IL. The Louisiana Association of Business and Industry (LABI) is Louisiana’s official state chapter of the U.S. Chamber of Commerce and the National Association of Manufacturers, and proudly serves a broad and diverse membership of small and large businesses alike. Our member companies range in size and service, providing consumers with access to energy that fuels their homes and vehicles, to the food that fuels their families. LABI’s mission is to foster a climate for economic growth by consistently championing the principles of the free enterprise system. LABI sets the standard for advocacy, providing policymakers with the information and perspective necessary to advance sound public policy that supports strong economic growth.

Representing more than 2,000 Louisiana employers of all sizes with multi-industry perspective, LABI recognizes the importance of the maritime industry to the state’s economic growth, national competitiveness, and contributions to the global market place. It is appropriate to highlight the benefits of this industry, and prevent any threat to stifle progress in this sector. In a 2015 maritime workforce study conducted jointly by LABI and Louisiana’s Community & Technical Colleges (LCTCS), “An Invisible Giant: The Maritime Industry in Louisiana,” Louisiana was cited as the national leader in maritime jobs. The importance of this industry to the overall economic soundness of the state is unparalleled. An estimated one in five jobs in Louisiana is connected to the maritime industry, resulting in employment income of more than $3.5 billion every year. In fact, the maritime industry has an $11 billion total annual economic impact in the state, and Louisiana is the only state to post more than $10 billion in total gross economic output directly related to its maritime industry. The Louisiana Maritime Task Force estimates that “waterway dependent” jobs generate nearly $2 billion in tax revenue. Louisiana ranked No. 1 in export intensity and export growth among all the 50 states, sending an estimated $59 billion in goods abroad in 2014. The state transfers 500 million tons of cargo every year, ranking Louisiana No. 1 in waterborne commerce that accounts for 20 percent of the national total. Louisiana leads the nation in overall amount and concentration of maritime jobs, which frequently pay above the U.S. average. According to US Department of Labor statistics, Louisiana leads the nation in maritime jobs in various positions.
As you may surmise from the report’s data, Louisiana has received a more than positive return on investment from the waterway industry. This commercial navigation trade is the crux of our economy, and a main artery that allows the continued free-flow of commodities such as petrochemicals, agriculture, metal, plastics, and machinery from the Mississippi River to the Great Lakes. It is not only vital to our member companies, but to the consumers and the overall heartbeat of the U.S. economy. Therefore, any disruption to the inland waterways system in Illinois is not limited to a local Great Lakes issue, but in fact, impacts the larger U.S. economy and has a direct effect on trading states, such as Louisiana.

While LABI supports the United States Army Corp of Engineer’s (USACE) efforts to isolate and eliminate the spread of Asian carp into the Great Lakes and surrounding waterways, and appreciate the challenges this invasive species presents to the aquatic ecosystem, we respectfully request the USACE fully evaluate the scope, cost, and impact of pathway closures and control measures outlined in the 2016 Asian Carp Action Plan developed by the Asian Carp Regional Coordinating Committee (ACRCC). LABI believes this full evaluation should advise the selected approach and consider non-structural, cost-effective approaches when appropriate. LABI also urges USACE to avoid implementing structural controls without supporting evidence of the effectiveness of those structural measures and a full understanding of the secondary and tertiary costs associated with their implementation. Louisiana employers, employees and beneficiaries of the state’s maritime industry are asking the USACE to exhaust all non-structural options prior to building new structures, that may or may not solve the problem, in the river that will impede commerce.

Again, thank you for the opportunity to share the industry’s perspective on one of the most critical economic drivers of our state. If you have any questions, please feel free to contact me at courtneyb@labi.org.

Sincerely,

[Signature]

Courtney L. Baker
Issue Council Director
Government Reform Task Force, Technology and Trade, Transportation & Tourism
Louisiana Association of Business and Industry (LABI)