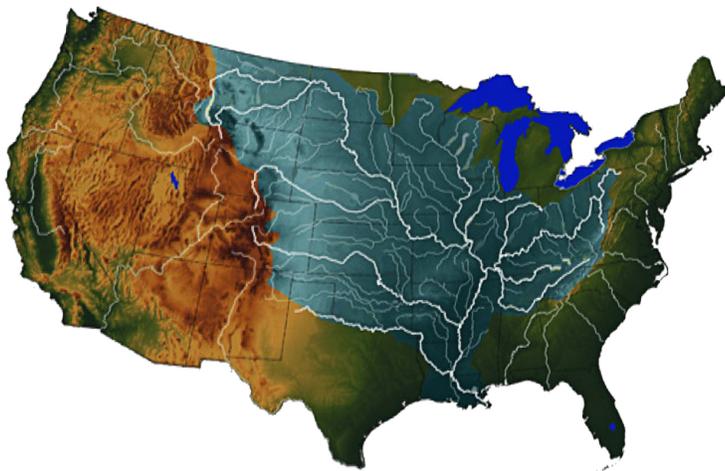


# BIG RIVER COALITION



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January 30, 2017

Mr. Steve Roberts  
U.S. Army Corps of Engineers  
CEMVN-PD  
7400 Leake Avenue  
New Orleans, LA 70118

## **Re: Draft Integrated General Reevaluation Report & Supplemental Environmental Impact Statement Comments**

Mr. Roberts,

The Big River Coalition (BRC) was created in Fiscal Year 2011 in response to the announcement by the Commander of the United States Army Corps of Engineers' (USACE) Mississippi Valley Division that channel maintenance on the Mississippi River Ship Channel, Gulf to Baton Rouge (Louisiana) would be limited by the dedicated funding (Operations and Maintenance [O&M] budget). Prior to this position change the Mississippi River Ship Channel received preferential treatment and often received additional funding from other USACE projects. After the 1989 grounding of the M/V MARSHAL KONYEV (Pilottown) that, in essence, closed the Ship Channel to all traffic, the USACE's Headquarters announced in a position statement that it would maintain the nation's most critical navigation channel. The BRC originally focused on obtaining additional funding to supplement the shortfall in the Corps' O&M budget, to strive to establish a legislative firewall around the Harbor Maintenance Trust Fund and to represent members of the Mississippi River navigation industry in matters related to coastal restoration. As our membership grew and continued to make effective progress on these initiatives, members supported the Coalition's commitment to actively advocate for the deepening of the Mississippi River Ship Channel Gulf to Baton Rouge to 50 feet.

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The Coalition's membership depends on the federal investments on the navigation structures and channels across the 31 states that are connected by the Mississippi River and Tributaries (MRT). Recent economic studies indicate the MRT has an annual economic impact of over \$400 billion on the national economy, while our transportation infrastructure and channels suffer from neglect as perpetuated by long-term underinvestment. The review of the Draft General Reevaluation Report (GRR) and Supplemental Environmental Impact Study (SEIS) is critical to the process of deepening the Mississippi River Ship Channel to the neopanamax depth of 50 feet.

The GRR and SEIS were provided by the U.S. Army Corps of Engineers (USACE) in partnership with the Louisiana Department of Transportation and Development (LDOTD). The integrated draft report documents that the channel deepening project offers significant reductions in transportation costs and adds the environmental benefit of immediately creating 1,500 acres of land along the Mississippi River Delta (bird's-foot delta).

The Big River Coalition acknowledges that the proposed Tentatively Selected Plan (TSP) for the next phase of construction is to deepen the Mississippi River Ship Channel (MRSC) to 50 feet from the entrance at Southwest Pass (Mile 22 Below Head of Passes) to Mile 168.5 Above Head of Passes (AHP). The TSP includes deepening the following three MRSC Crossings: Rich Bend (Mile 158.8 AHP); Belmont (Mile 154.2 AHP); and Fairview (Mile 115.7 AHP) to 50 feet based on the Low Water Reference Plane (LWRP). The area of Southwest Pass, or more specifically from Mile 13.4 AHP to Mile 22 Below Head of Passes, would be deepened to 50 feet on the Mean Lower Low Water (MLLW) datum.

This coincides with the selected National Economic Development (NED) plan that was developed by comparing the construction costs of deepening, the increase in annual incremental operations and maintenance costs and the average projected economic benefits.

The Draft GRR and SEIS have produced the following TSP:

“Tentatively Selected Plan (TSP): The Tentatively Selected Plan (TSP) for the next phase of construction, is alternative 3d. This alternative is to deepen the MRSC to a depth of 50 ft LWRP for the 3 crossings located within the footprint of the Port of South Louisiana and a depth of 50 ft MLLW in the Lower Mississippi River from RM 13.4 AHP to RM 22 BHP. The 9 crossings located within the footprint of the Port of Baton Rouge would remain at 45 ft LWRP.”

The identified TSP suggests a total investment cost of \$92,882,068 and based on the Water Infrastructure Improvements for the Nation Act (WIIN) that was signed into Public Law No: 114-322 by President Obama on December 6, 2016 the Federal cost share is now seventy-five percent and the non-Federal portion is twenty-five percent. **Thus, if the documented total cost is accurate the Federal responsibility is \$69,661,551 and the non-Federal (LDOTD) is \$23,220,517.**

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The Big River Coalition believes that the return on investment, although hard to accurately predict, could indeed be sizably higher. To highlight that point, simply focus on agricultural exports while tracking that the world population is expected to nearly double in the next 50 years. The need to feed both people and livestock will simultaneously increase during this same period and agricultural productivity must keep pace. The Mississippi River Ship Channel is the chosen artery of trade for the distribution of sixty to seventy-five percent of the United States annual agricultural exports.

The United Nations Educational, Scientific and Cultural Organization (UNESCO) predicted the following need for increased agricultural yields to nourish the ever-growing world population in a report titled:

## *“How to Feed the World in 2050”*

“By 2050 the world’s population will reach 9.1 billion, 34 percent higher than today. Nearly all of this population increase will occur in developing countries. Urbanization will continue at an accelerated pace, and about 70 percent of the world’s population will be urban (compared to 49 percent today). Income levels will be many multiples of what they are now. In order to feed this larger, more urban and richer population, food production (net of food used for biofuels) must increase by 70 percent. Annual cereal production will need to rise to about 3 billion tonnes from 2.1 billion today and annual meat production will need to rise by over 200 million tonnes to reach 470 million tonnes.

This report argues that the required increase in food production can be achieved if the necessary investment is undertaken and policies conducive to agricultural production are put in place. But increasing production is not sufficient to achieve food security. It must be complemented by policies to enhance access by fighting poverty, especially in rural areas, as well as effective safety net programmes.”

The proposed TSP suggests the deepening above New Orleans to 50 feet LWRP would end at Mile 168.5 after deepening the following three Crossings: Rich Bend (Mile 158.8 AHP); Belmont (Mile 154.2 AHP); and Fairview (Mile 115.7 AHP). The estimated quantity of additional material to be dredged from the three Crossings to the increased depth is just over three million cubic yards. However, the Coalition would like to suggest that the proposed break between 50 feet LWRP and 45 feet LWRP be matched to that of the previous deepening project.

When completed in December 1987 the channel was deepened from 40 feet to a depth of 45 feet from the Gulf of Mexico to Donaldsonville (LA) at Mile 181 AHP. During the next phase of that deepening the entire channel was deepened to 45 feet in 1994. Although, the current TSP includes cutting off the 50 feet LWRP at Mile 168.5 AHP. In reviewing the data in the provided Engineering Appendix (Appendix C), the Big River Coalition understands that the request to extend the channel to Mile 181 AHP, as done during the previous deepening effort, would mean that only one additional Crossing would need to be dredged. Specifically, that to extend the

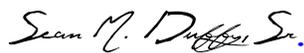
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deepened MRSC to Mile 181 AHP an additional 1.5 million cubic yards of material would have to be removed from Smoke Bend Crossing at Mile 175 AHP.

The Coalition requests that extending the proposed channel deepening to Mile 181 be considered. Based on the estimated dredging costs of \$2.5 million (or less) to remove the additional 1.5 million cubic yards of material at Smoke Bend by dustpan dredge, the impact on the overall cost of the project is minimal. Based on this cost estimate, the need to only deepen one additional Crossing and because of the additional facilities that would be included within that extra 12.5 miles of channel at 50 feet LWRP, the Coalition remains hopeful that this request can be properly reviewed without delaying the advertised schedule or negatively impacting the identified benefit cost ratio. The Coalition is also willing to assist in data collection and providing contacts for the facilities between River Mile 168.5 AHP and 181 AHP.

The membership of the Big River Coalition applauds the efforts of the United States Army Corps of Engineers and the Louisiana Department of Transportation and Development (non-Federal sponsor) in delivering this draft report. The Coalition intends to assist in securing support and commitments in order to ensure the Mississippi River Ship Channel is brought into the neopanamax-age and deepened to 50 feet.

Sincerely,



Sean M. Duffy, Sr.  
Executive Director