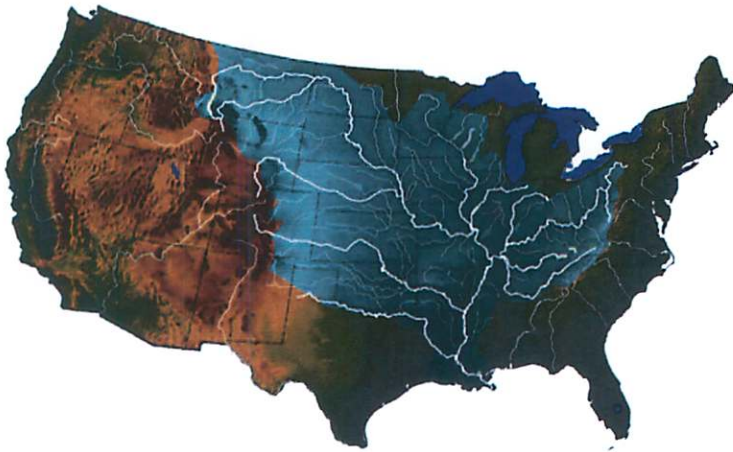


BIG RIVER COALITION



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February 23, 2018

Dr. Russell Callender
Assistant Administrator
National Ocean Service
1325 East-West Highway
Silver Spring, MD. 20910

RE: MISSISSIPPI RIVER SHIP CHANNEL PRECISION NAVIGATION PROJECT

The Big River Coalition was created in Fiscal Year 2011 in response to the announcement by the Commander of the United States Army Corps of Engineers' Mississippi Valley Division confirming the discontinuation of reprogramming funds to maintain the Lower Mississippi River navigation channel. This position change immediately meant the Mississippi River's navigation channel would no longer receive preferential treatment. Shortly after the 1989 grounding of the M/V MARSHAL KONYEV (Pilottown) that, in essence, closed the navigation channel to all ship traffic, the USACE's Headquarters announced in a position statement that it would maintain the nation's most critical navigation channel. The BRC's original focus was to obtain additional funding to supplement the shortfall in the Corps' Operations and Maintenance 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 requested that the Coalition actively advocate for the deepening of the LMR navigation channel to 50 feet. The Big River Coalition comprises over 100 maritime entities that rely on the full availability of the Mississippi River navigation channel and properly operating maritime infrastructure to effectively transport nearly 500 million tons of imported/exported cargo annually.

The Big River Coalition is committed to "Advocating for a Mightier Mississippi River" to ensure the future of unimpeded navigation on the Mississippi River Ship Channel (MRSC) as one of the nation's fundamental natural resources and true economic powerhouse. The Mississippi River and Tributaries project has an estimated \$ 735.7 billion annual impact on the nation's economy and

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is responsible for approximately 2.4 million jobs (585,000 jobs on the Lower River – Cairo, IL to the Gulf of Mexico and 1.86 million plus jobs on the Upper River-Lake Itasca, MN to Cairo, IL and including the IL River).

There are five deep-draft ports situated on the MRSC comprising the Lower Mississippi River Deep-Draft Ports Complex specifically the ports of: Baton Rouge, South Louisiana, New Orleans, St. Bernard and Plaquemines – along 256 miles of the Mississippi River Ship Channel (Baton Rouge to the Gulf of Mexico). This Ports Complex is a true economic superhighway annually responsible for 7,500 ships transits (in and out) and over 500,000 barge movements transferring over 500 million tons of cargo each year. Over 60% of the nation's grain exports and 20 % of the nation's coal exports annually transit the MRSC.

The navigation industry on the nation's busiest and most prolific Ship Channel have developed a profound respect for and close working relationship with the National Atmospheric & Oceanic Administration and supporting agencies. The navigation industry depends on information provided by NOAA and support agencies like the National Weather Service on a weekly if not daily basis. We applaud NOAA for honoring their mission statement:

“To understand and predict changes in climate, weather, oceans, and coasts, to share that knowledge and information with others, and to conserve and manage coastal and marine ecosystems and resources.”

The memberships of the Louisiana Maritime Association and the Big River Coalition benefit greatly from the ability to receive real-time channel information form NOAA's Physical Oceanographic Real-Time System (PORTS) Lower Mississippi River website. Since this program was established after the devastation of Hurricane Katrina navigation stakeholders have embraced the ability to retrieve real-time metrics to assist with vessel or cargo movements.

However, there remain gaps where increased data and improved sensor criterion or realigned placement would greatly enhance the existing gaps in pertinent channel data availability. The Big River Coalition applauds NOAA for their initiative to modernize and increase their Lower Mississippi River sensors under the proposed Precision Navigation Project.

Navigation stakeholders that utilize the MRSC and move 500 million tons of cargo every year remain hopeful that new sensors, increased hydrographic surveys and upgrades to water velocity or current meters can be fast-tracked to increase navigation metrics for decision-making. There is no doubt the Precisions Navigation sensors would serve to increase navigational safety and that new current meters, air gap sensors on all bridges (infrastructure) and documented heights or elevations for utility lines that cross the Mississippi River Ship Channel, detailed hydrographic surveys with the inclusion of full bank-to-bank surveys especially within deep-draft anchorages should be a national priority.

The New Orleans – Baton Rouge Steamship Pilots Association (NOBRA), who are responsible for maintaining safe navigation on vessels transits between New Orleans and Baton Rouge, have reported concerns with varying and in accurate Air Gap information on the Interstate 10 (I-10) Bridge that crosses the MRSC at Mile 229.3 Above Head of Passes. The navigation charts

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provided by the U.S. Army Corps of Engineers list the Air Gap of the I-10 Bridge at 174 feet minus the river stage at Baton Rouge Gauge and also states lowest steel equals 174 feet. NOAA's published chart 11370 (23rd Edition, Sept. 22/01) documents a vertical clearance of 125 feet. The Coalition assumes the 125 feet represents a low steel reduction of the Baton Rouge river stage at the highest recording stage level (47.28 feet on May 15, 1927) thus equaling 172.28 feet. NOBRA has also requested that the PORTS Current meter at Port Allen be repositioned to ensure that it provides accurate reading on the deep-draft channel. The navigation industry supports the Precision Navigation Project as a path forward to remove such assumptions, especially with several vessels have reporting touching the low steel on the I-10 Bridge during high river stages.

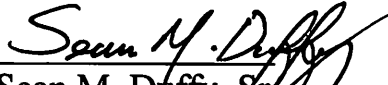
The aforementioned grounding of the M/V MARSHAL KONYEV near Pilottown (1989) represents one of the historical channel closings that Precision Navigation Sensors could help prevent. The grounding led to the closing of the MRSC for 21 days and the economic impacts of such an incident today would clearly have huge negative impact on the economics of the MR&T.

Unfortunately, all too often the economics of a closure along the Mississippi River Ship Channel are underestimated and virtually impossible to properly forecast – although NOAA has been at our side during the recovery from Hurricane Katrina, along with multiple Hurricane preparations and response/recovery efforts since, the impacts of the Deep-Water Horizon Spill, the recovery from the closure of the M/T TINTOMARA collision with the MEL OLIVER and DM-932 and several notable vessel groundings.

Quantifying real-time air drafts for bridges and utility lines that cross the Ship Channel, increased live current meters and survey data along with increased overall awareness broadcasts of actual and present conditions could indeed be viewed as preventative measures and navigation stakeholders welcome the evolution of the PORTS program.

The Precision Navigation Project offers the ability to assist mariners and scheduling and promoting navigational safety and being able to broadcast real-time data and updates on NOAA's Electronic Navigational Charts is clearly needed. The Mississippi River and Tributaries has an estimated annual impact of over \$735 billion to the nation's economy and the investment in the Precision Navigation Project on the Mississippi River Ship Channel must justify the modernization of real-time channel data along the nation's prolific waterway.

Sincerely,


Sean M. Duffy, Sr.
Executive Director