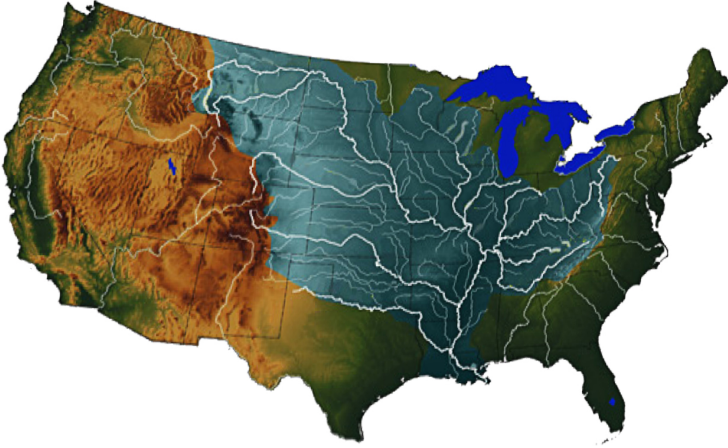


BIG RIVER COALITION



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March 12, 2018

Mr. Thomas P. Smith
Chief, Operations and Regulatory
U.S. Army Corps of Engineers
441 G Street NW
Washington, DC 20314-1010

RE: Pilottown Anchorage **Water Infrastructure Improvements for the Nation Act Section 1122**

Dear Mr. Smith,

The Big River Coalition (BRC), a Mississippi River Ship Channel (MRSC) based navigation industry trade alliance, respectfully requests the U.S. Army Corps of Engineers (USACE) consider dredging the Pilottown Anchorage under Section 1122 Beneficial Use of Dredged Material of the Water Infrastructure Improvements for the Nation Act (WIIN Act). The Coalition makes this appeal in response to the Notice published in the Federal Register on February 9, 2018, after reviewing the text of this Notice (Section 1122) we respectfully request that the Pilottown Anchorage be approved as a Section 1122 Pilot Project. The Pilottown Anchorage is severely deficient for the use of deep-draft vessels (ships) and that the shoaling in this federal anchorage compromises navigational and life safety. The USACE Mississippi Valley New Orleans has provided surveys of the Pilottown Anchorage that indicate there are over 25 million cubic yards of sediment material within this critical anchorage. The Pilottown Anchorage is the first federal anchorage on the MRSC that is available for vessel usage when entering through Southwest Pass.

The Pilottown Anchorage is a federal feature of the Mississippi River Ship Channel as identified in the Code of Federal Regulations (CFR) under Title 33, Chapter I, Subchapter I, Part 110, Subpart B, Section 110.195.

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§ 110.195 Mississippi River below Baton Rouge, LA, including South and Southwest Passes.

(a) *The Anchorage Grounds.* Unless otherwise specified, all anchorage widths are measured from the average low water plane (ALWP).

(1) *Pilottown Anchorage.* An area 5.2 miles in length along the right descending bank of the river from mile 1.5 to mile 6.7 above Head of Passes, extending in width to 1600 feet from the left descending bank of the river.

The Pilottown Anchorage is the first location, that the vessels entering the treacherous currents of the Mississippi River can anchor when experiencing engine malfunctions, are impacted by extreme weather conditions, or other emergency conditions. There are five deep-draft ports that make up the Lower Mississippi River Deep-Draft Ports Complex (Baton Rouge, South Louisiana, New Orleans, St. Bernard, and Plaquemines). Each year 7,000 or more ships engaged in commercial trade enter the MRSC and nearly 500 million tons of cargo are moved through the Lower Mississippi River Deep-Draft Ports Complex. Due to the heavy shoaling, even shallow draft vessels are forced to avoid transiting within this anchorage forcing them into the federally authorized Ship Channel thus creating navigational hazards for deep draft vessels.

The dredging in the Pilottown Anchorage has been performed on at least three occasions by the USACE as part of the Coastal Wetlands Planning, Protection and Restoration Act specifically to address shoaling related to the West Bay Diversion project. The Coalition would like to see the dredging of the Pilottown Anchorage considered as one of the ten pilot projects outlined in Section 1122 Beneficial Use of Dredged Material of the WIIN Act. In reviewing the text of Section 1122, we believe that the proposed dredging of the Pilottown Anchorage satisfactorily meets the seven (7) criterion listed under the heading marked (a) In General:

- 1) The beneficial use of dredged material could indeed be used to protect low lying homes, businesses and infrastructure of Plaquemines Parish from damage caused by storm surge.
- 2) The dredging of the Pilottown Anchorage would promote public safety (navigational safety) by restoring historic channel and federally authorized anchorage depths.
- 3) The placement of the material along the estuaries of the West Bay receiving area has been one of MVN's key successes for the increased beneficial use of dredged material. This strategic material placement serves to protect critical aquatic habitat and marsh areas by armoring the boundaries and protecting the sensitive habitat from the harsh impact of wave action.
- 4) The removal of material from this critical anchorage would help to stabilize the channel flow and be strategically placed to armor the shoreline boundaries.

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- 5) The surrounding area is comprised of prolific wetlands that promote multiple forms of recreation, hunting, fishing, boating and ecotourism.
- 6) Restoring the Pilottown Anchorage to historic depths and reestablishing its use as a deep-draft anchorage would reduce risks to transiting vessels. Restoring this deep-draft anchorage would promote navigational safety and reduce life safety risks. This anchorage is adjacent to the nation's most prolific navigation channel and the restoration of the anchorage's Federally Authorized dimensions would help reduce the risks associated with vessel groundings.
- 7) The MVN has worked closely with the Coalition and navigation stakeholders in this reach of the MRSC to reduce the dredging costs by disposing of material in "previously approved dredged material placement sites" in close proximity of the dredged areas and innovative uses of dredged material (storm surge reduction). There is no doubt that the MVN can insure that all caveats under item #7 are met by this proposed project: fill material, civic improvement and innovative uses for economic and environmental benefits.

The Coalition respectfully requests that the undersigned, Sean M. Duffy, Sr. be included on the Regional Beneficial Use Team for the MRSC as highlighted under subsection (c) of Section 1122: Regional Beneficial Use Teams. The Coalition has the utmost respect for the USACE and enjoys a close working relationship and would be honored to assist as the USACE develops new concepts for beneficial use of dredged material handling. The placement of dredge material to restore our coasts along navigation channels and offer protection from storm surge must be a made a top national priority.

The Coalition has worked closely with MVN staff and assisted with increasing the beneficial use of material placement in the area of Southwest Pass on the lower end of the Mississippi River Ship Channel. Since cutterhead dredges were reintroduced and reapproved by local River Pilots for use in Southwest Pass approximately 6,500 acres of new Louisiana marsh has been created in the environmentally sensitive bird's foot delta. The Coalition is pleased to report that over the last three years, two new Corps records for the amount of material beneficially used have been achieved, in 2015 a new national Corps record of 20.7 million cubic yards of material was established. However, that record was eclipsed in 2017 when 20.8 million cubic yards of material was beneficially used to protect the channel from encroachment. A cutterhead dredge is expected to arrive in Southwest Pass later this week, to start the 2018 beneficial use cycle.

Entries submitting proposals for a project must include the following information:

- 1) Name and location of the proposed project:
Pilottown Anchorage Restoration Project, on the Mississippi River Ship Channel, the federally authorized anchorage is 5.2 miles in length along the right descending bank of the river from mile 1.5 to mile 6.7 above Head of Passes, extending in width to 1600 feet from the left descending bank of the river.

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- 2) Purpose of the proposed project (see paragraph 5 of the Implementation Guidance).
To restore the historic dimensions (width and depth) to the federally authorized project feature of the Mississippi River Ship Channel and to beneficially restore critical wetlands in the immediate area, while armoring the channel from encroachment.
- 3) Description of the proposed project, including more detail on how material will be used beneficially to meet project purposes identified in 2 above.
See previous description, above.
- 4) The name of all non-federal interests planning to act as the sponsor, including any non-federal interest that has contributed or is expected to contribute toward the non-federal share of the proposed beneficial use project.
The undersigned believes that this project like the cutterhead usage along Southwest Pass can be done within the federal standard. However, based on the quick turnaround time for submittal we were unable to address potential non-federal sponsors, although there are a variety of potential sources.
- 5) List the authorized U.S. Army Corps of Engineers (Corps) water resources development project(s) that the proposed beneficial use project is associated with.
The Mississippi River Ship Channel and the Coastal Wetlands Planning, Protection and Restoration Act's West Bay Diversion are the projects most closely linked to the proposed beneficial use of dredged material project from the Pilottown Anchorage.
- 6) Provide an estimate, to the extent practicable, of the total beneficial use project cost, and the federal and non-federal share of these costs.
There is a wide range of prospective costs based on the potential amount of material to be determined, any amount of material removed will help to promote navigational safety and restore critical coastal habitat. The cost would be determined by the availability of funds, but a safe approximation based on the ongoing cutterhead contracts is about \$3.00 per cubic yard removed.
- 7) Describe, to the extent practicable, of the total beneficial use project cost, an estimate of the anticipated monetary and non-monetary benefits of the proposed beneficial use project with regard to the environmental, economic and social benefits of the project.
The cost of the project will be determined by the amount of material removed under contract by the cutterhead dredge(s) utilized, the non-monetary benefits are immense in that the project would promote navigational safety, restore fragile wetland habitat that is heavily utilized recreationally and would have a profound and positive impact on both protecting and creating the vibrant estuaries in the immediate area. The project also would provide storm surge reduction for exposed areas of Plaquemines Parish.
- 8) Describe if local support exists for the proposal.

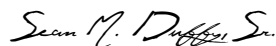
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There is overwhelming local support for this Pilot Project, although based on time limitations support was not officially acquired from others the membership of the Big River Coalition offers adamant support for the project. Notable members in the immediate area include: Bar Pilots, Crescent River Port Pilots, Federal Pilots, and Plaquemines Port Harbor & Terminal District. The beneficial use of dredged material in the area of the Pilottown Anchorage has been supported and applauded by numerous entities and recognized for being “complimentary to or consistent with the State’s Master Plan by the Coastal Protection and Restoration Authority (Louisiana) and honored by the American Shore and Beach Preservation Association’s Coastal Innovator Award in 2016.

- 9) Statement of the non-federal interest’s financial ability to provide a share of the project costs. Based on the rapid timeline for project submittal the BRC was unable to provide a non-federal sponsor or their alleged interest and financial ability. However, the Coalition continues to believe that the beneficial use work can be performed within the Federal Standard as the present cutterhead dredge work has been.

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 virtually 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.

Sincerely,



Sean M. Duffy, Sr.
Executive Director