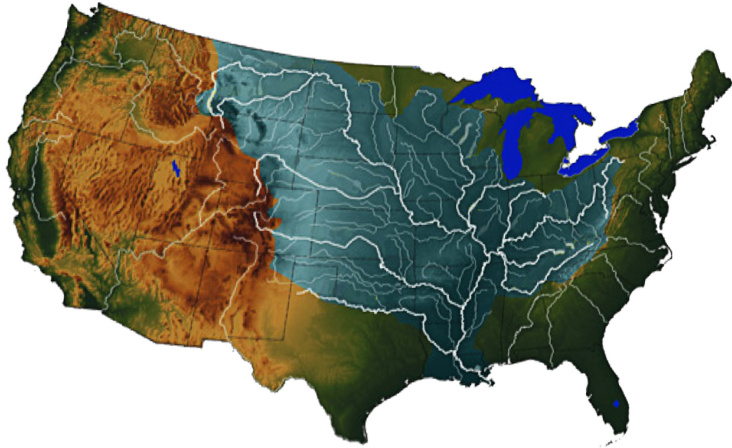


# BIG RIVER COALITION



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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: Red Eye Crossing 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 Red Eye Crossing 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 Red Eye Crossing be approved as a Section 1122 Pilot Project. The USACE's Mississippi Valley New Orleans (MVN) maintains thirteen (13) deep-draft crossing on the MRSC from Baton Rouge to New Orleans. The Red Eye Crossing is continually the Crossing that requires the most channel maintenance for deep-draft vessel traffic (ships) and that the shoaling in this Crossing offers an excellent area for beneficial use of dredged material.

The New Orleans Baton Rouge Steamship Pilots Association (NOBRA) which represents the state appointed river pilots that assist with the safe navigation of deep-draft vessels between New Orleans and Baton Rouge have increasing concerns about channel conditions in this vicinity. NOBRA has detailed challenges from Mile 234 Above Head of Passes (AHP) to Mile 220 AHP in recent years, Red Eye Crossing is reported to be at Mile 224 AHP.

“This fourteen (14) mile stretch of river has been experiencing difficulty in dredging and the maintenance of a channel that is advertised to shipping interests to allow a forty-five (45) foot draft clearance. In 2017, the Port (Baton Rouge) had six-hundred and eighty-five (685) ship movements.”

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The MVN has discussed challenges with maintaining the Crossings based on material suspended by the dustpan dredges settling back down, sometimes in close proximity to the dredge site and theoretically having to be dredged in multiple locations. There appears to be agreement that beneficial use of the material from the Crossings would be advantageous and promote channel maintenance. The NOBRA Pilots also focused on Red Eye Crossing as a likely location to begin a beneficial use project.

“The sediment removed could be placed into existing dormant sandpits that could be transferred for fill at construction sites and low-lying areas in the greater Baton Rouge area. The USACE also explored a possible site below the Red Eye Range Crossings on the left descending bank that could be filled to recreate an island that was washed away twenty-five (25) years ago.”

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. The MVN provided information that indicates that Red Eye Crossing requires the most annual dredging of the 13 deep-draft crossings. The five year average for material removed at Red Eye Crossing indicates that 25% of all material removed on the Crossings is from Red Eye in both total cubic yardage and average cubic yards removed over the last five fiscal years (Fiscal Year 2013 to 2017). The total cubic yardage removed from Red Eye Crossing was reported to be 29,111,339 over the last five fiscal years with an average of 5,822,268 cubic yards removed per year. The second Deep-Draft Crossing for amount of material removed during the same period shows, Belmont Crossing (Mile 154 AHP) has had a total of 17,178,105 total cubic yards removed with an average of 3,435,621 cubic yards removed per year.

The Coalition requests that the dredging at Red Eye Crossing be 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 Red Eye Crossing location 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 could be used to armor infrastructure in the surrounding area.
- 2) The dredging at Red Eye Crossing would promote public safety (navigational safety) by maintaining federally authorized channel depths and could show benefits of removing material from the riverine system.
- 3) The placement of the material outside of the river system near Red Eye Crossing could help reduce channel maintenance downriver of the site and would be suitable material for restoration projects.

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- 4) The removal of material from this Crossing could help to stabilize the channel flow and be beneficially used.
- 5) The surrounding area is easily accessible and containment of material for restoration would be prime for both residential and commercial fill.
- 6) Beneficially using the material removed from the Red Eye Crossing on this deep-draft channel could provide a real-time test to demonstrate eventual cost-reductions by reducing the amount of annual dredging at the downriver Crossings. The maintenance of this Crossing is important to the nation's most prolific navigation channel and the annual maintenance costs and amount of material removed warrant inclusion as a Pilot Project to monitor potential cost savings through the beneficial use of dredged material.
- 7) The MVN has worked closely with the Coalition and navigation stakeholders in this reach of the MRSC amid efforts to find ways to reduce dredging costs. At least theoretically, removing sediment from the system completely could reduce the amount of dredging at downriver locations. However, because of budgetary constraints the MVN is forced to respond via the dustpan dredges that suspend or reposition the material, without supplemental funding there is no method to test these ideas.
- 8) 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 has enjoyed 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 Corps record for 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. This successful use of cutterhead dredges began in 2009 based on cooperation between the Corps and navigation stakeholders and has been hugely successful. The Coalition desires

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to see if we cannot replicate these successes by beneficially using the material removed from the Crossings.

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

- 1) Name and location of the proposed project:  
Red Eye Crossing, this Crossing extends from approximately Mile 226 AHP to Mile 223.2 AHP and often singularly listed as Mile 224 AHP on the Mississippi River Ship Channel.
- 2) Purpose of the proposed project (see paragraph 5 of the Implementation Guidance).  
To remove sediment dredged at Red Eye Crossing on the Mississippi River Ship Channel in order to test promote beneficial use of dredged material and study the impact on shoaling downriver of the site.
- 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.  
Based on the quick turnaround time for submittal we were unable to address potential non-federal sponsors, although there are a variety of potential funding sources especially if the Pilot Project were to indicate the hypothesized benefits of removing additional material.
- 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.  
Channel maintenance on the Deep-Draft Crossings between Baton Rouge and New Orleans on the Mississippi River Ship Channel at approximately Mile 224 Above Head of Passes.
- 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 removed, any amount of material removed would assist in providing results to test the benefits of completely removing the material from the riverine system. The cost would be determined by the availability of funds, but a safe approximation based on recent cutterhead contracts as utilized in Southwest Pass is about \$3.00 per cubic yard removed.

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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 while also demonstrating the real-time benefits of completely removing sediment material from the riverine system. The belief is that this project could provide new information to be utilized in future decisions regarding channel maintenance on the Mississippi River Ship Channel.

8) Describe if local support exists for the proposal.

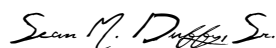
There is local support for this Pilot Project, from the membership of the Big River Coalition and specifically the NOBRA and Federal Pilots along with other channel users.

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 an alleged interest with financial ability. However, the Coalition continues to believe that the beneficial use work could provide a model to reduce the costs of annual maintenance to the Federal Operations and Maintenance Budget.

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