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Mark A. Wright
Vice President – Southern Region

December 17, 2022

Ms. Jennifer Brown
Vicksburg District
U.S. Army Corps of Engineers
4155 Clay Street
Vicksburg, MS 39183-3435

Re: Application MVK-2021-286, Viking
USA, LLC

Dear Ms. Brown:

The American Waterways Operators (AWO) is the tugboat, towboat and barge industry's advocate, resource, and united voice for safe, sustainable, and efficient transportation on America's waterways, oceans, and coasts. Our industry is the largest segment of the nation's 40,000-vessel domestic maritime fleet and moves 665 million tons of cargo each year safely and efficiently. On behalf of AWO's more than 300 member companies, we appreciate the opportunity to comment on the permit application MVK-2021-286 for a docking facility along the Yazoo River Diversion Canal.

We are concerned that the current designs for the docking facility would pose a hazard to navigation, and we are grateful for the comment deadline extension so that we can share our concerns with you. We also appreciate and look forward to meeting in January with the Corps, Viking USA, LLC, and other maritime stakeholders to identify solutions that work for all Yazoo River stakeholders.

If the docking structure is built as planned, it would extend beyond the edges of the cofferdam downriver and would not allow enough space to safely navigate tows through the proposed area. This problem would be exacerbated in low water conditions. The chokepoint would be especially dangerous to passengers aboard a moored cruise ship. In addition, this would increase safety risks to mariners and could lead to environmental damage.

We believe that this is a solvable problem. For instance, moving the structure closer to the left descending bank could provide more space between transiting tows and the moored cruise ship. Additionally, alternative mooring stations, such as a spacer barge or retractable mooring barge, could alleviate concerns about proper mooring space in low water conditions and would not require a structure that extends so far into the waterway.

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The current proposal would decrease safety for all on the river. We support efforts to increase the utility of the Vicksburg waterfront, but not at the risk of mariner or passenger safety. We look forward to our upcoming discussion to find a workable solution to this issue for the applicant and the broader maritime industry. Thank you for the opportunity to comment on this application.

Sincerely,

A handwritten signature in cursive script, appearing to read "Mark A. Wright".

Mark A. Wright
Vice President – Southern Region

CC:

Mr. Bryan Williamson, Chief, Permit and Evaluation Branch, Vicksburg Division, USACE
Mr. Pat Chambers, Chief, Operations and Regulatory, Mississippi Valley Division, USACE
Ms. Kristi Hall, Chief, Regulatory Division, Vicksburg District, USACE