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April 2, 2024

COL Cullen Jones
Commander and District Engineer, New Orleans District
U.S. Army Corps of Engineers
7400 Leake Ave
New Orleans, LA 70118

Re: Lower Mississippi River
Comprehensive Study Public Scoping

Dear COL Jones,

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 through 25,000 miles of inland and intracoastal waterways, the Great Lakes, and the Atlantic, Pacific and Gulf coasts. This includes more than 60 percent of U.S. export grain, energy sources such as coal and petroleum, cement, iron ore, and other bulk commodities critical to the U.S. economy.

Thank you for the opportunity to comment on the scope of the U.S. Army Corps of Engineers' (Corps) Lower Mississippi River Comprehensive Study (LMR Comp). Commerce moving on the Mississippi River and its tributaries is an incredible asset for the American people. The 2022 Transportation Statistics Annual Report¹ noted that, in 2020, 165.5 million tons of freight moved between the twelve states that touch the Mississippi River system. The Lower Mississippi River is the most heavily trafficked part of the river system and provides a vital path for U.S. exports to the international market with the Mississippi River Basin accounting for 92% of U.S. agricultural exports. However, recent low water events and other challenges have spotlighted ongoing navigation concerns. The need for consistent, transparent, and initiative-taking solutions that facilitate the Marine Transportation System while protecting communities, mariners, and the environment is essential to the nation.

The LMR Comp provides an opportunity for the Corps to examine and implement actions needed to protect and enhance navigation on the river for decades to come. AWO provides the following input on the scope of the study:

¹ U.S. Department of Transportation, Bureau of Transportation Statistics, Transportation Statistics Annual Report 2022 (Washington, DC: 2022). <https://doi.org/10.21949/1528354>

- **Assess economic and environmental benefits to maintaining a 12-foot channel from Cairo, IL to the Gulf of Mexico.**
 - A 12-foot navigation channel was authorized by Congress in the 1944 Flood Control Act.
 - A dependable 12-foot channel will provide an increased value to the nation and to agricultural exports.
 - Implement a process during a national security and/or supply chain emergency for low water like the one that already exists for high water.
 - Collaborate with the Maritime Administration (MarAd) and/or the Department of Transportation's Committee on the Maritime Transportation System (CMTS) or to conduct studies to understand the full economic impacts along with other impacts to the nation (safety, security, and environmental).

- **Assess equipment needs to maintain a 12-foot navigation channel.**
 - Two of the current dredges are over 90 years old.
 - Recapitalization of new dredges needs to be implemented quickly to ensure resilience of navigation – assess the use of the Federal Acquisition Regulation (FAR) to ensure emergency contracting.
 - To maintain the 12-foot channel and routes to access areas, the Corps should utilize contract dredges as outlined in WRDA 2022, Section 8133, *Regional Dredging Project*.
 - Further plans and funding should include the main channel and access to ports, terminals, and fleeting areas.

- **Assess collaboration needed with other state and federal agencies to better predict river depths.**
 - Work with the Tennessee Valley Authority (TVA) to improve reliability of flows at the confluence of the Ohio and Mississippi rivers.
 - Ensure NOAA moves forward with crowd-sourcing channel depths to improve reliability.
 - Improve predictions of water levels utilizing National Oceanic and Atmospheric Administration (NOAA) – River Forecast Centers and NASA technologies.
 - Work with the National Weather Service (NWS) to improve water level predictions, especially if the changes are extreme.

- **Assess possible new or expanded technologies to enhance safe and efficient navigation.**
 - Investigate and implement crowd-source data from industry vessels.
 - Eliminate all electronic buoy “black holes.”
 - The U.S. Coast Guard's AIS encoding guide needs upgrading to ensure safe navigation.
 - Evaluate the need for air gap sensors on bridges that pose safety risks to ensure safe passage of vessels.

- Investigate the use of drones for photogrammetry surveys to map the riverbed and water levels.
- **Assess information needed to inform the public of the value of navigation to the nation (economic and environmental).**
 - Collaborate with the Institute for Water Resources (IWR), National Planning Center of Expertise for Inland Navigation (PCXIN), Waterways Commerce Commission, MarAd, CMTS, and Engineer Research and Development Center (ERDC).
- **Assess the need for anchorages.**
 - With a reliable and resilient system, traffic is likely to increase and areas to stage vessels could improve efficiency and safety.
- **Assess processes that affect navigation efficiency and safety.**
 - Improved permitting processes – transparent, consistent, and collaborative with industry and the Coast Guard.
- **Assess funding needs to accomplish the above goals.**

Thank you again for the opportunity to provide input on the scope of the LMR Comp. AWO looks forward to working with the Corps as the LMR Comp moves forward.

Sincerely,

A handwritten signature in black ink, appearing to read "Justin Lampert". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Justin Lampert
Senior Manager – Midcontinent Office