

April 22, 2022

Colonel Stephen Murphy
Commander, New Orleans District
U.S. Army Corps of Engineers
7400 Leake Ave #3651
New Orleans, LA 710118

Colonel Murphy,

Thank you for being so willing to engage with our industry on this issue. We are writing today to express our concerns regarding the permit to expand the CEMUS Deep Water Port in Port Allen, Louisiana, to accommodate a post-Panamax cargo ship. Our organizations represent farmers, ranchers, food and beverage manufacturers, processors, package suppliers, farm supply dealers, and agricultural product marketers—many of whom rely on the Mississippi River to maintain U.S. agricultural competitiveness. We request a further evaluation of the permit appropriately considering each user's concerns on the Mississippi River.

Our members appreciate the infrastructure upgrades underway throughout the inland waterways system. By adding an ancillary 1,200 ft lock in many locations, the Corps has allowed operators to almost eliminate the need to break tows and reduce the risk of injury or loss of life.

Unfortunately, the addition of a post-Panamax-sized vessel at this location increases the safety risk for operators. The Coast Guard has expressed safety concerns about the permit, including a letter from 2015 stating that granting the permit would “increase the probability of a major marine incident.” Since 1991, there have been at least 34 bridge allisions and nine dock allisions (when a ship runs up against a bridge or a dock).

As you know from the project outline, the location in question is at a narrow section of the river just south of Highway 190 Bridge, which currently has limited passage lanes beneath the bridge for commercial tow/barge combinations after they transit a sharp bend in the river. The initial permit, approved in 1947, was at a time when traffic on the Mississippi River was a fraction of what it has become today.

Throughout the entire Mississippi River Watershed, we see remnants of history that can impede the efficiencies gained in the past decades. Congress has addressed these issues by providing \$2.5 billion in federal funding to upgrade locks and dams that have exceeded their design life. Like the aging lock and dam system that Congress has addressed, this dock has outlived its design life and is incompatible with today's inland waterways transportation system.

A future incident or actions taken by vessel operators to prevent future incidents, such as breaking up barge tows, would significantly reduce river transportation capacity and efficiency. Any disruptions on this stretch of the river will threaten the competitiveness of American farmers and agricultural stakeholders, particularly during harvest time when the agriculture industry is

seeing significant demand for its products, necessitating the shipment of cargo south and raw materials north.

The investment by Congress is not the only reason we are concerned with this permit application. The inland waterways industry has made substantial environmental progress over the past century to become the cleanest mode of surface transportation available to American shippers. For example, a 2022 National Waterways Foundation study states that shipping the same cargo by rail and truck generates 43 percent and 800 percent more CO2 emissions than shipping by barge. In addition, the Intergovernmental Panel on Climate Change report has also identified waterborne transportation as the lowest emitting form of freight transportation. However, suppose operators must navigate this part of the river under an approved permit. In that case, we firmly believe more equipment, a dock, and vessels serving the facility would severely reduce both environmental benefits and the capacity of the northbound and southbound towboat and barge traffic and create a significant safety hazard on this stretch the Mississippi River.

As the Corps considers this permit application, we strongly urge the Corps to assess the safety, economic, and competitiveness implications if this project is approved. The U.S. supply chain continues to feel stress, especially with significant rail service issues and the shortage of truck drivers. Projects that would require barge tows to break up on the river would further hamper the U.S. supply chain.

Sincerely,

Agricultural Retailers Association
American Farm Bureau Federation
American Feed Industry Association
American Soybean Association
Corn Refiners Association
National Corn Growers Association
National Council of Farmer Cooperatives
National Grain and Feed Association
National Oilseed Processors Association
National Sorghum Producers
Pet Food Institute
USA Rice Federation
Waterways Council, Inc.

CC: Major General William (Butch) H. Graham, Deputy Commanding General for Civil and Emergency Operations, U.S. Army Corps of Engineers.
Rear Admiral Richard V. Timme, Eighth District Commander (D8), U.S. Coast Guard.
Thomas J. Vilsack, Secretary, Department of Agriculture.