



PROTECT GULF COAST COMMERCE DON'T ACT PRECIPITOUSLY ON THE MRGO!

Congress should take no action in WRDA to mandate a closure of the Mississippi River Gulf Outlet “MRGO” for shallow draft navigation without assuring the availability of a viable alternate inland route for barge traffic to bypass the Inner Harbor Navigation Canal “IHNC” Lock. The Draft EIS is flawed. While we do not contest the closure of the MRGO to deep draft traffic or even to regular shallow draft traffic, we must ensure there is a reasonable way to keep East-West inland commerce moving when the antiquated IHNC Lock is out of service. This is not just a local issue. It is an issue of regional and national significance.

The Issue: *The IHNC Lock is the inland waterways gateway to all points on the Gulf Coast east of the Mississippi River.*¹ For example, in one week, over 40 million gallons of petroleum goes through the lock.² The Lock is 85 years old, mechanically complex and unreliable. Its replacement has been authorized and approximately \$100 million has been spent on it, but we cannot expect a new lock for at least 10 years. During this time, the old lock will shut down periodically for maintenance and due to failures, perhaps for an extended period of time. The MRGO is not just a shortcut from New Orleans to the Gulf. It and Bayou Baptiste Collette provide an alternate way around the IHNC Lock, an essential safety valve to keep commerce moving when the lock is down (as it was for 16 days following Katrina and for 59 days in 1998). The only other current alternative – going around via the Ohio River and Tenn-Tom Waterway – is really no alternative at all, adding an additional month to each round trip.

The Problem: The Corps proposes to close the MRGO to **all** navigation, including shallow draft, as a part of the de-authorization of the waterway for deep draft navigation, removing this vital safety valve for commerce. However, their draft analysis that purports to justify this decision has significant flaws.

What We Need: An emergency route around the IHNC lock for those times when it is closed due to maintenance or unexpected failures. We seek the lowest cost viable alternative. We do not seek to impose a particular solution at this point. The Corps should be directed to recommend the best alternative.

Background: The recently released American Society of Civil Engineers report on Katrina and the Corps of Engineers Draft Environmental Impact Statement “DEIS” on the Closure of the MRGO to deep draft navigation say the MRGO did not play a major role in the flooding of New Orleans, yet this has not abated the groundswell of sentiment in some quarters against the MRGO. We do not contest the closure of the MRGO to deep draft traffic or even to regular shallow draft traffic. We simply need an alternative for those times the IHNC is out of service. The DEIS suggests the cost of maintaining shallow draft navigation for such emergencies exceeds the benefits, but there are many omissions in this study:

- The Corps did not consider the consequences of a prolonged closure at the IHNC Lock with no alternative route available. They assumed no closure would extend more than one day.
- The Corps’ use of a 50 year planning horizon obscures the much more limited investment needed to keep this option available for the 10 years or so it will be needed pending replacement of the IHNC Lock.
- The Corps estimated costs on the basis of maintaining either a 300’ or 500’ channel, far wider than the 125’ channel of the Gulf Intracoastal Waterway, which is all that is needed.
- The Corps did not compare the costs of their proposed alternative routes against the cost of maintaining the capacity for emergency shallow draft navigation in the IHNC.
- The Corps significantly underestimated the vessel delay costs arising from a closure and did not consider at all the financial impacts of closures on affected industries or communities.

Congress should not act precipitously. We need to get all the facts on the table and make a reasoned decision for the benefit of the area, the region and the nation.

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¹ On average since 2000, 17.2 million tons of cargo pass through the lock each year. Origins and destinations range throughout the inland river system, showing that this is not simply a local issue. Some highlights: 8.4 million tons to/from Alabama. 4 million tons to/from Mississippi. 3.6 million tons to/from Texas. 2 million tons to/from Florida. This includes gasoline and other fuels needed by consumers along the coast and all the jet fuel for our coastal military bases east of the Mississippi.

² Based on figures from the Corps Lock Performance Monitoring System (6,870,800 tons of petroleum moved in 2006).