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April 21, 2017

Mr. Jeffrey A. McKee U.S. Army Corps of Engineers Chief, Navigation Branch Operations and Regulatory Division 441 G. Street, NW Washington, D.C. 201314-1000

Dear Chief McKee:

Thank you for the additional time to prepare this response concerning the U.S. Army Corps of Engineers report on the need for further hopper dredge fleet capital investment. Our comments will reflect on two areas: the current and projected capabilities of the private industry hopper dredge fleet, and the future workloads and demands on the overall public and private fleets.

New industry dredges are large and adding capability to those firms that did not previously compete in this size range. This does nothing to enhance medium hopper market requirements. Medium class industry dredges, built during the 1980s and designed for a useful life of approximately 30 years, are reaching milestone replacement decision dates. The potential that a medium class shortage could occur in the 2020s requires the pursuit of planning and design efforts <u>now</u> to replace this class of hopper dredges if the Corps is to effectively respond to navigation needs.

U.S. demand for hopper dredges is increasing due to harbor deepening and coastal flood protection projects. Several indicators of a strong and modestly growing hopper dredge workload include large port deepening efforts due to the Post-Panamax market and subsequent marginal net increases for continued and annual maintenance requirements. It is imperative that the COE be in a position to respond to these growing needs.

Further, medium class dredges are absolutely vital in the case of navigational emergencies and national defense needs. They also serve as test beds for innovative and promising ideas to include turtle deflection and green technologies such as the LNG/dual fuel engines that result in lower emissions, thereby granting access to otherwise prohibited areas due to stringent emission requirements.

Finally, if the Corps is to succeed in the business of comprehensive management of contract planning, fleet capability and knowledge is essential. For all of these reasons as well as those stated in our letter of April 10, we again request that you consider making the necessary capital investments and allow the hopper dredge McFarland to continue its critical work of providing emergency capability on both a local and a national level.

Thank you for your consideration, and please feel free to contact me at 215-925-2615 or at dennis.rochford@maritimedelriv.com with questions or need for additional information.

Sincerely.

Dennis Rochford

President

cc: Tristate Congressional Members