



April 10, 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:

This letter is to request additional time to prepare a response concerning the U.S. Army Corps of Engineers (Corps) report on the need for additional capital investments in its hopper dredge fleet.

Your March 31, 2017 letter requested comment no later than April 14, 2017 on two specific items: the current and projected capabilities of the private industry hopper dredge fleet, and the future overall workloads and demands on the public and private fleets. In order for us to effectively evaluate the report data, we request your consideration of a comment deadline of April 28. While we await your reply to this request, allow us the opportunity to provide the following observations.

The impact on Delaware River ports minus completion of needed maintenance dredging would be immediate, negative, and significant. The competitive nature of the maritime industry deems essential the maintenance of federal navigation channels. The Corps, in turn, must have the flexibility to deal with unanticipated and unexpected conditions that have the potential to adversely impact the navigability of federal channels.

Delaware River ports are in the throes of dramatic and positive change awaiting the completion of the Delaware River 45 foot Main Channel Deepening project. In 2016, 2,427 ships arrived at Delaware River facilities, an increase of 8.3% over 2015 regional vessel calls. This increased activity points to a renewed and vibrant maritime community. Clearly, navigational safety is a fundamental necessity as new port facilities, to include Paulsboro in New Jersey and Edgemoor in Delaware, anticipate a 45 foot channel. As you are aware, Philadelphia Regional Port Authority facilities are also undergoing a \$300 million modernization program. The need for maintaining the Delaware River shipping channel at 45 feet has never been more critical.

In the past, the availability and immediate response of the hopper dredge McFarland to unexpected shoaling and other emergency situations has ensured that vessels calling Delaware River port facilities continue without draft or tide restrictions or unnecessary delays. We must continue to have this type of service in the future. We therefore request that you consider taking appropriate steps to make the necessary capital investments to allow the hopper dredge McFarland to continue to provide emergency capability on both a local and national level.

Sincerely,

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for the Bay & River Delaware

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