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Jill Bessetti
Vice President – Southern Region

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U.S. Army Corps of Engineers
New Orleans District
c/o Public Affairs Office
7400 Leake Ave.
New Orleans, LA 70118

Re: Final GRR SEIS Mississippi
River, Baton Rouge to the Gulf of
Mexico Mississippi River-Gulf
Outlet, Louisiana New Industrial
Canal Lock and Connecting
Channels Project

Dear Sir/Ma'am:

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. As the largest segment of the nation's 45,000-vessel domestic maritime fleet, our industry plays a vital part in America's supply chain and national security, moving the nation's commerce on U.S. inland and intracoastal waterways, the Atlantic, Pacific and Gulf Coasts, and the Great Lakes. On behalf of AWO's more than 300 member companies, we appreciate the opportunity to comment on the U.S. Army Corps of Engineers' Final General Reevaluation Report and Integrated Supplemental Environmental Impact Statement (GRR/SEIS) for the Inner Harbor Navigation Canal (IHNC) Lock Replacement.

Consistent with our previous comments on the draft report, AWO strongly supports the Corps' Recommended Plan to replace the existing lock with a new 900' L x 110' W x 22' shallow-draft lock, and the associated flood risk management and surface transportation infrastructure required for the replacement. We additionally support Plan 3 remaining as both the National Economic Development (NED) Plan and the Total Net Benefits Plan in the final report.

For over 100 years, the U.S. inland navigation system has relied on the IHNC as a critical linkage between the Mississippi River and the Gulf Intracoastal Waterway (GIWW). As the only route connecting the Mississippi River and the western GIWW, a prolonged closure forces traffic onto routes that add weeks of transit and emergency detours, imposing significant costs on shippers and the broader supply chain. Corps data shows the IHNC has among the

longest transit times of any commercial lock in the nation, with delays averaging over 15 hours and reaching as long as 36 hours. In recent years, the lock has been plagued with repeated emergency repairs, unplanned outages, and limited operating hours. Continued reliance on this fragile structure is untenable given the roughly 14.4 million tons of cargo, valued at approximately \$6.9 billion, that move through the lock each year.

Replacing this critical connection will deliver significant benefits to the nation. The larger chamber will allow a towboat and four barges to lock through at once, rather than the single tug and barge the existing lock permits, easing congestion and improving efficiency. The project also incorporates important flood risk management infrastructure and is estimated to generate more than \$4 billion in local economic impact and roughly \$7.7 billion in total regional output, supporting tens of thousands of jobs across the region and the broader national economy.

This project is also vital to our national security. The Corps' own analysis elevates the IHNC lock from a regional civil works project to a matter of national security, describing the lock as a critical valve connecting the Gulf Coast's refining and petrochemical complexes to the rest of the country. Petroleum and petroleum products are the dominant commodities moving through the lock, and this connection is a linchpin of our nation's energy distribution network. Prioritizing and appropriately funding this project are squarely aligned with the Administration's goals of unleashing American energy and restoring American maritime dominance. We urge Congress and the Corps to treat it accordingly in the appropriations and work-planning process.

The project carries a positive benefit-to-cost ratio (BCR) even under conservative assumptions. The Corps' BCR reflects a conservative floor rather than a complete accounting of system value. As noted in the report, it does not fully capture the reliability and avoided-catastrophic-failure benefits of replacing a century-old structure, it carries substantial non-NED implementation costs and contingencies, and it excludes regional economic development and national security value. Viewed against the expected growth in vessel traffic and the consequences of prolonged unplanned closures, the economic case for the Recommended Plan is clear.

AWO thanks the U.S. Army Corps of Engineers for its thorough and thoughtful analysis of this project and its impacts, not only for vessel traffic and the nation, but also for the local communities surrounding the project site. As this critical project moves forward, we urge the project team to keep the design and engineering phase on schedule so that construction can begin without delay and the reliability of this critical connection can be restored.

Thank you again for the opportunity to comment on this vital project. AWO would be happy to provide additional feedback upon request.

Sincerely,

Jill Bessetti

A handwritten signature in black ink, appearing to read "Joe Bass". The signature is fluid and cursive, with a prominent loop at the end.

Vice President – Southern Region