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Jill Bessetti  
Vice President – Southern Region

August 28, 2025  
U.S. Army Corps of Engineers  
New Orleans District  
c/o Public Affairs Office  
7400 Leake Ave  
New Orleans, LA 70118

Re: IHNC Lock  
Replacement

Dear Sir/Madam,

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. Our industry is the largest segment of the nation's 40,000-vessel domestic maritime fleet and moves 665 million tons of cargo each year safely, sustainably and efficiently. On behalf of AWO's more than 300 member companies, we appreciate the opportunity to provide feedback on the Inner Harbor Navigation Canal (IHNC) Lock Replacement Draft General Reevaluation Report and integrated Supplemental Environmental Impact Statement.

The IHNC lock is an integral part of our nation's inland waterway system and provides a continuous route for east and west bound vessels transiting the Gulf Intracoastal Waterway to the Mississippi River. This enables vessels to avoid inclement weather situations in the Gulf of America and without the longer transit times of alternate routes.

Corps' data indicates that from 2012-2023 the IHNC had the longest transit time of any commercial lock in the nation, with delays averaging over 15 hours and sometimes as long as 36 hours during high water events. While we commend the Corps' efforts to maintain this aging infrastructure, we strongly support the replacement project. During a recent site visit to the lock, AWO learned that the backup lock gates are still operated by the original machinery from when the lock was built over 100 years ago. This reliance on antiquated equipment is inconsistent with the Administration's priorities of restoring America's maritime dominance and unleashing American energy. Understanding that bringing in contractors to operate this machinery and dealing with the challenges posed by antiquated equipment are cumbersome, it is imperative that the replacement project is completed to avoid costly emergency lock

closures that have detrimental effects on businesses and consumers throughout the national economy when vital maritime commerce is disrupted.

The Corps' recommended plan for a 110' x 900' x -22' shallow draft lock is the best option for replacement. Compared to the other alternatives in the Corps' draft GRR SEIS, this plan provides the highest annual net benefits and highest benefit cost ratio. The larger lock will enable more efficient navigation by allowing tows to break up less often. The existing lock only allows transits by a single tugboat and barge, while most of the tow configurations on the Mississippi River and Gulf Intracoastal Waterway are made up of one towboat and 6 or more barges. Given the sensitive cargo that many of these barges carry, they cannot be left unattended. Operators have to contract out as many as 5 or more assist vessels to lock their barges through the IHNC, driving up costs for both vessel operators and shippers. The Corps' recommended plan will allow for a towboat and 4 barges to lock through at once, significantly reducing the need and cost for assist vessels and enabling more efficient transits.

Overall, AWO supports the Corps' recommended plan for the IHNC Lock Replacement Project considering the need for and benefits of replacing the current IHNC lock with larger more modern infrastructure as outlined in the proposal. We also echo the sentiments of Waterways Council, Inc., in urging the Corps to keep the publication of the Directors Report on schedule as discussed at the last meeting of the Inland Waterways Users Board.

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

Sincerely,

A handwritten signature in black ink, appearing to read "Jill Bessetti", with a stylized flourish at the end.

Jill Bessetti  
Vice President – Southern Region