



666 High Street, Suite 200-B
Worthington, OH 43085

PHONE: 614.565.8319
EMAIL: jlampert@americanwaterways.com

Justin L. Lampert
Director – Midcontinent Office

April 10, 2025

Ms. Robyn S. Colosimo
Deputy Assistant Secretary of the Army for Project Planning
and Review
Office of Renewable Energy Programs
U.S. Army Corps of Engineers
441 G Street NW
Washington, DC 20314-1000

Re: WRDA 2024 Implementation Guidance (COE-2024-0004)

Dear Ms. Colosimo:

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 and efficiently. On behalf of AWO's more than 300 member companies, we appreciate the opportunity to comment on the implementation of the Thomas R. Carper Water Resources Development Act of 2024 (WRDA 2024). Our comments will primarily focus on sections 1149 and 1118.

Section 1149 – Remote Lock Operation

Establishing appropriate procedures to ensure that remote lock operations do not compromise the safety or security of our nation's mariners, and the supply chain should be the highest priority. Therefore, any approved remote operations should adhere strictly to the processes outlined in WRDA 2024 and uphold the principle that lock operation is an inherently governmental function as specified in WRDA 1990.

Section 1118 – Regional Dredge Pilot Program

AWO thanks the Army Corps of Engineers (Corps) for the prompt implementation of the Inland Waterways Regional Dredge Pilot Program. Ensuring the safety and reliability of the inland waterways is crucial to the American supply chain. Awarding dredging contracts based on the considerations listed in section 1118 will help maintain authorized river depths in a cost-effective way.

Proactively awarding contracts will reduce response time, enhancing the Corps' ability to promptly address changing circumstances impacting the movement of waterborne commerce. Equipment can be strategically positioned at known trouble spots to address issues before they affect navigation and the U.S. supply chain.

As this program is implemented, contracts should prioritize the use of equipment that permits minimal or intermittent channel closures. All-day waterway shutdowns for dredging pose safety concerns and economic impacts. The absence of locations for tows to safely "pull over," particularly as queues increase, jeopardizes mariner safety. Waterway closures significantly impact the supply chain and export markets and should be avoided whenever possible.

USACE Funding

WRDA is an integral piece of legislation to ensure our supply chain is secure and reliable; however, the work of the Corps is equally crucial. The Corps overall, and its infrastructure projects in particular, have been continuously underfunded resulting in countless operational challenges. Emergency lock closures in recent years have shut down vital stretches of our nation's inland waterway system for extended periods of time. Disruption to this system leads to increased congestion on our roadways, greater pollution in our atmosphere, and negative economic impacts on businesses and communities.

Recent efforts to cut the Corps' funding and staffing will only further delay construction and maintenance projects and prevent necessary repairs to ensure the reliability and safety of our nation's supply chain. AWO urges that Corps programs be reviewed thoughtfully to avoid counterproductive cuts that undermine rather than enhance the economic efficiency of the inland waterways system.

Thank you for the opportunity to comment. AWO would be pleased to answer any questions or provide further information to assist in the implementation process.

Sincerely,

A handwritten signature in black ink, appearing to read "Justin Lampert". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Justin Lampert
Director – Midcontinent Office