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Justin L. Lampert
Director – Midcontinent Office

October 23, 2026

Mr. Erich Ceisel
U.S. Army Corps of Engineers
Chicago District
231 South LaSalle Street, Suite 1500
Chicago, Illinois 60604-1437

Re: Permit Application No. LRC-2022-00410; Section 408 Review for Bally's Chicago Casino Dock Development

Dear Mr. Ceisel,

The American Waterways Operators 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 our over 300 members, we appreciate the opportunity to provide feedback on the proposed Bally's Chicago Casino Dock Development project and permit application.

AWO and its member companies have serious concerns about the proposal's potential negative impacts on the safety, efficiency, and reliability of commercial navigation within the Chicago Area Waterway System (CAWS). The Chicago River is not merely a recreational waterway; it is an active commercial navigation corridor that supports the movement of construction materials, aggregates, fuel, and other commodities essential to the economies of both Illinois and the United States.

Navigation Channel Encroachment

The Corps' public notice identifies proposed floating docks extending approximately 19 feet into the waterway, with a maximum encroachment of 37 feet when four boats are moored. The notice also identifies existing river widths as narrow as 164 feet north of Ohio Street and 174 feet at the former Erie Street bridge abutments. The Corps further acknowledges that vessels moored at and operating near these docks would extend into the designated channel of the Chicago River Navigation Project. Together, these conditions would reduce the maneuvering

room available for commercial towing vessels and barges. Operators already navigate this area with limited margins for error, particularly when maneuvering around bends and beneath bridges with barges in tow. Further reducing the available channel width would increase the risk of vessel accidents and undermine safe navigation on the Chicago River.

Increased Recreational Vessel Traffic and Navigation Concerns

Industry is concerned that the proposed project would increase navigation and safety risks by concentrating recreational vessel activity in a constrained section of the river already heavily utilized by commercial traffic. The proposed docks are located near the Ohio Street Bridge and within a bend where towing vessels and barges require adequate maneuvering room and channel width to safely navigate. Recreational traffic and vessels moored at the docks would further constrain the space available for commercial vessels which would increase the risk of collisions and allisions.

Coast Guard and NTSB data highlight the risks of collisions and allisions in congested waterways shared by commercial and recreational vessels. The 2026 Coast Guard-AWO Annual Safety Report identifies allisions as the leading initiating event among high-severity towing incidents analyzed, while NTSB research identifies similar risks associated with constrained navigation on the Chicago River. Since the proposed project would introduce structures and additional recreational traffic into an already constrained commercial waterway, the Corps should require a comprehensive navigation safety risk assessment before the project moves forward. The assessment should identify and address hazards associated with the proposed structures and increased recreational traffic on the Chicago River.

Floating Wetlands, Vessel Wake, and Propeller Wash

The proposed floating garden is located within a bend of the river near the former Erie Street bridge abutments where commercial vessels routinely generate wake and wheel wash as part of safe navigation. Given its location, the structure is likely to experience repeated impacts from vessel wake that could damage the garden, compromise its moorings, and potentially create navigation hazards if any portion were to become detached.

AWO is concerned that the proposed floating garden may be fundamentally incompatible with the operational demands of this busy commercial navigation corridor. The Corps should carefully assess whether the proposed floating garden can withstand these conditions without creating ongoing maintenance challenges, safety concerns, or conflicts with commercial vessel operations.

Request for Further Analysis and Mitigation

In recognition of the Chicago River's critical importance to commercial navigation within the CAWS, AWO respectfully requests that the Corps:

1. Require the permit applicant to conduct a comprehensive Navigation Safety Risk Assessment in consultation with commercial waterway users and the U.S. Coast Guard.
2. Consider the cumulative impact of both the proposed structures and vessels utilizing the docking facilities.
3. Ensure sufficient navigable channel width is preserved to accommodate existing and future commercial traffic.
4. Evaluate the safety implications associated with increased recreational vessel activity in the project area.
5. Consider modifications to the project design that reduce encroachments into the navigation corridor, particularly in constrained areas near bridges and bends.

Conclusion

AWO respectfully urges the Corps to carefully evaluate the project's impacts on commercial navigation and navigation safety. Based on the concerns described above, AWO requests that the Corps require the applicant to conduct a comprehensive Navigation Safety Risk Assessment and refrain from issuing any permit or authorization until that assessment has been completed, reviewed, and demonstrates that the project will not jeopardize the safe and efficient movement of waterborne commerce on the Chicago River.

Thank you for the opportunity to comment.

Sincerely,

A handwritten signature in black ink, appearing to read "Justin Lampert", with a stylized, flowing script.

Justin Lampert
Director-Midcontinent Office