



Lake Carriers' Association

The Greatest Ships on the Great Lakes

JAMES H. I. WEAKLEY, PRESIDENT

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July 23, 2012

Docket Number USCG-2012-0569

Via Fax: (202) 493-2251

Docket Management Facility (M-30)
U.S. Department of Transportation
West Building Ground Floor, Room W12-140
1200 New Jersey Avenue SE
Washington, DC 20590-0001

Dear Sir or Madam:

**Safety Zone; Head of the Cuyahoga and U.S. Rowing Masters Head Race National Championship,
Cuyahoga River, Cleveland, Ohio
Federal Register, Volume 77, Number 128
Tuesday, July 3, 2012**

Lake Carriers' Association ("LCA") represents 17 American companies that operate 57 U.S.-flag vessels ("lakers") on the Great Lakes and carry the raw materials that drive the nation's economy: iron ore and fluxstone for the steel industry, aggregate and cement for the construction industry, coal for power generation, as well as salt, sand and grain. Collectively, these vessels can transport more than 115 million tons of dry-bulk cargo per year. LCA members employ more than 1,600 men and women, all of whom are U.S. citizens or legally admitted aliens, and provide annual wages and benefits of approximately \$125 million. In turn, the cargos our members carry generate and sustain more than 103,000 jobs in the United States and have an economic impact of more than \$20 billion.

The Cuyahoga River is a frequent destination for our members. In a strong economy they can deliver and load more than 8 million tons of cargo to docks along the main channel and what is called "The Old River Bed." Iron ore for the steel mill at the end of the Federal channel is the primary cargo. It can top 3 million tons per year. Some of the ore is still shipped directly from the loading port to the steel mill, but much is offloaded at a dock on the lakefront and then reloaded into smaller ships that can navigate that challenging waterway.

Limestone (aggregate and fluxstone) is the next largest commodity delivered to Cleveland. That trade can total more than 4 million tons per year when the construction industry is busy and the steel mill is operating at capacity.

Other cargos include salt (nearly 600,000 tons), sand (350,000 tons) and cement (100,000 tons).

Although they are not members of Lake Carriers' Association, the Cuyahoga River is also a major port of call for Canadian lakers and both U.S.- and Canadian-flag tank barges. In total then, waterborne commerce on that waterway can top 12 million tons during a period of peak demand.

We have repeatedly voiced our concern about the proliferation of recreational events throughout the Great Lakes that require lengthy closures of commercial waterways. We recognize that the Great Lakes are a shared waterway, but the situation may have reached the point where we will seek a District-wide policy from the Ninth District.

Specific to these events, we did agree to 9-hour closures on September 15 and 16. The Notice of Proposed Rulemaking has expanded those closures to 10 hours. It is our understanding that the additional half hour at the beginning and end of the races was added to allow for setting the course and then clearing the River. The permit requested by the race sponsors already factored these activities into the 9-hour closure, so the additional time is not needed.

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The Association Representing Operators of U.S.-Flag Vessels on the Great Lakes

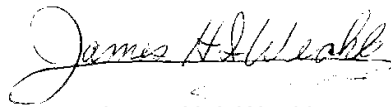
AMERICAN STEAMSHIP COMPANY ♦ ANDRIE, INC. ♦ ARMSTRONG STEAMSHIP COMPANY ♦ BELL STEAMSHIP COMPANY
CENTRAL MARINE LOGISTICS, INC. ♦ GRAND RIVER NAVIGATION COMPANY, INC. ♦ GREAT LAKES FLEET/KEY LAKES, INC.
INLAND LAKES MANAGEMENT, INC. ♦ THE INTERLAKE STEAMSHIP COMPANY ♦ LAKES SHIPPING COMPANY
LAKE MICHIGAN CARFERRY SERVICE ♦ PERE MARQUETTE SHIPPING ♦ PORT CITY MARINE SERVICES ♦ PORT CITY STEAMSHIP SERVICES
SOO MARINE SUPPLY, INC. ♦ UPPER LAKES TOWING COMPANY, INC. ♦ VANENKEVORT TUG & BARGE INC.

More importantly, under no circumstances will we agree to an extra hour each day. Our members' vessels transiting the Cuyahoga River have hourly operating costs that can approach \$2,000. Our members are going to do their best to schedule around these closures, but if there's an unexpected delay at the load port, or weather becomes an issue, the potential of spending 9 hours at anchor already represents a significant expense. That's why we are disappointed that the proposed rulemaking states that these closures will have minimal economic impact. Our members' vessels depart the loading dock within minutes of closing the hatches and are underway again within minutes of finishing unloading because operating costs are such that even a few idle minutes must be avoided.

We also want to make clear that our acceptance of these 9-hour closures does not set any precedent. If there is an 18th Annual Head of the Cuyahoga race next year (and we assume there will be), we will have to assess the needs of commerce before endorsing such a lengthy closure. We continue to believe that there should be a way to include a window for transit of commercial vessels during these events.

Thank you for the opportunity to comment. If you need additional information, please contact us at your convenience.

Very Respectfully,

A handwritten signature in cursive script that reads "James H. I. Weakley". The signature is written in black ink and is positioned above the printed name and title.

James H. I. Weakley
President