



Lake Carriers' Association

The Greatest Ships on the Great Lakes

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Via E-Mail: Melinda.Wilkinson@wisconsin.gov

Ms. Mindy Wilkinson
Invasive Species Coordinator
Bureau of Science Services
Wisconsin Department of Natural Resources

Dear Ms. Wilkinson:

Draft Wisconsin Statewide Strategic Plan for Invasive Species

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, our members can transport more than 115 million tons of dry-bulk cargo per year and 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 eight Great Lakes and have an economic impact of more than \$20 billion.

Wisconsin's Great Lakes ports are a frequent destination for our members. In 2012, they loaded more than 12 million tons of coal at Superior Midwest Energy Terminal in Superior, Wisconsin, and nearly 6.5 million tons of iron ore at the Burlington Northern Santa Fe dock in Superior. They also delivered significant amounts of coal, limestone, cement, salt, and liquid-bulk products to terminals in Green Bay, Milwaukee and Manitowoc. A recent study determined that the cargos our members carry create and sustain almost 5,600 jobs in the Badger State.

When ice closes the Lakes, our members invest tens of millions of dollars in maintaining and modernizing their vessels in shipyards in Sturgeon Bay and Superior.

We have reviewed the referenced document and would like to make the following comments. We fully endorse the goal of stopping new introductions of aquatic invasive species ("AIS") to the Great Lakes. We appreciate that the focus is on "new" AIS. The painful reality is that once an exotic has taken root, eradication, even containment, are all but impossible.

The ruffe is a case in point. Following its discovery in western Lake Superior in the late 1980s, Lake Carriers' Association became the first maritime organization in North America to develop and implement a voluntary ballast water management plan and it was aimed at preventing the spread of ruffe in vessels' ballast water. This was quite a challenge; the twin ports of Duluth/Superior typically handle more than 1,000 vessel calls per year. Even so, only two other populations of ruffe were ever discovered outside western Lake Superior, and one, that in Alpena, Michigan, was unable to survive.

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The Association Representing Operators of U.S.-Flag Vessels on the Great Lakes Since 1880

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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.

Despite our best efforts, the ruffe does continue to expand its range on Lake Superior. It is reported that the fish is migrating along the southern shore at the rate of about 25 miles per year. This movement is totally independent of commercial navigation, and we are unaware of any means to stop or reverse it.

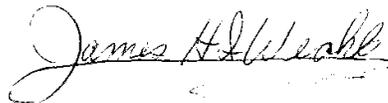
Therefore, we recommend that the proposed action of supporting the development of on-board ship technology for the treatment of ballast water be specifically applied to vessels entering the Great Lakes from the oceans. It is the so-called "salties" that have introduced the zebra mussel, ruffe, round goby and other AIS to the Lakes, and are, unwittingly for sure, the platform for any future introductions. Most of our members' vessels are Lakes-locked; they are too big to even enter the Welland Canal. The vessels that are small enough to reach Lake Ontario are not certificated to leave the Great Lakes/St. Lawrence Seaway System.

Some individuals and organizations would like to require lakers to treat their ballast (that's assuming there's ever a system that can cope with our operational requirements), but two simple facts remain: 1) these vessels never leave the Great Lakes and so have never and will never introduce an AIS; and 2) the Lakes are interconnected, hence exotics can and will migrate independent of commercial navigation. Treating lakers ballast will not stop future introductions of AIS, nor will it stop the spread of those exotics introduced by oceangoing vessels.

The draft Statewide Plan also recommends that treatment meet or exceed the current IMO standard. We are unaware of any approved system that can exceed the current IMO standard on salties. Furthermore, while we believe it unnecessary to treat our ballast, we must comment that shipowners and operators - of any flag - need certainty when building or retrofitting vessels. The current IMO standard appears attainable on oceangoing vessels, but to inject other, undetermined standards into the equation is counterproductive.

Thank you for the opportunity to comment. Our members greatly value their customers in Wisconsin and look forward to serving them with safe and efficient shipping for decades to come.

Very Respectfully,



James H. I. Weakley
President