



Lake Carriers' Association

The Greatest Ships on the Great Lakes

JAMES H. I. WEAKLEY, PRESIDENT

440-333-9995 • weakley@lcaships.com

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Via E-mail: Laura.A.Garnett@usace.army.mil

Mr. Charles M. Simon

Chief, Permit Evaluation Western Branch

Regulatory Office

U.S. Army Corps of Engineers, Detroit District

477 Michigan Ave.

Detroit, MI 48226-2550

Dear Mr. Simon:

Corps File No. LRE-1986-568754-S12

Proposed Dredging and Disposal (Beach Nourishment) in Lake Michigan at Moran, Michigan

Lake Carriers' Association (LCA) represents 17 American companies that operate 57 U.S.-flag vessels (lakers) on the Great Lakes. Their vessels 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, grain and gypsum. Collectively, our members can transport more than 115 million tons of dry-bulk cargo per year, and those cargos generate and sustain more than 103,000 jobs in the eight Great Lakes.

We are writing to endorse the dredging of Brevort Harbor and Ship Channel. Prior to the recession, our members could load as much as 500,000 tons of sand in Brevort Harbor. The trade remains important; in fact, the first cargo loaded by the newest member of LCA, the tug/barge DEFIANCE/ASHTABULA, was 20,053 tons of sand at Brevort for delivery to Buffalo, New York, last October.

The barge ASHTABULA could have loaded more cargo. At full draft the vessel can carry 32,368 tons. However, lack of dredging Lakes-wide and falling water levels are routinely forcing vessels to "lightload." The dredging of Brevort Harbor and Ship Canal will help increase the amount of cargo vessels can load there.

There will be a number of other benefits to dredging Brevort. Great Lakes shipping is the most cost-effective mode of transportation. The Corps estimates that Great Lakes shipping annually saves its customers \$3.6 billion compared to the next least costly mode of transportation.²

The environment benefits when vessels move cargo. A Great Lakes freighter travels 607 miles on one gallon of fuel per ton of cargo delivered. Put that cargo on a train and it moves only 202 miles on a gallon of fuel. If transported by a truck, the cargo moves just 59 miles. Ships produce fewer emissions than the land-based modes. A laker produces 90% less carbon dioxide than a truck and 70% less than a train.

Again, we fully support dredging Brevort Harbor and Ship Channel.

Very respectfully,

James H. I. Weakley
President

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20325 Center Ridge Rd., Ste. 720 ♦ Rocky River, OH 44116 ♦ www.lcaships.com

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

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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.