



Lake Carriers' Association

The Greatest Ships on the Great Lakes

JAMES H. I. WEAKLEY, PRESIDENT

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Submitted Via Federal eRulemaking Portal

Mr. Matt Brookhart

Chief, Policy and Planning Division

Office of National Marine Sanctuaries

1305 East-West Highway, 11th Floor

Silver Springs, MD 20910

Dear Mr. Brookhart:

**Re-Establishing the Sanctuary Nomination Process
Federal Register, June 28, 2013, Volume 78, Number 125, Pages 38848-38850**

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.

We believe the proposed criteria for nominating areas to be National Marine Sanctuaries needs to include a specific provision recognizing the importance of any waterborne commerce in the area and the need to ensure that it continues uninterrupted. Waterborne commerce on the Great Lakes is a major contributor to the U.S. and North American economies. A recent study determined that nearly 230,000 jobs in Great Lakes states and Ontario and Quebec depend on Great Lakes shipping. The cargos that our members carry account for 130,000 of those jobs.

Many major employers are based in the Great Lakes region and can compete globally because of the efficiencies of Great Lakes shipping. The U.S. Army Corps of Engineers estimates that waterborne commerce on our "Fourth Sea Coast" annually saves its customers \$3.6 billion in transportation costs compared to the next least costly mode of transportation. The environment benefits too; vessels burn less fuel and produce fewer emissions than trains and trucks.

To ensure our continued ability to move cargo safely and efficient, we ask that this provision be added to the procedures and protocols NOAA is contemplating:

When considering the nomination of an area for national marine sanctuary status, NOAA shall determine that such designation shall not unduly interfere with the movement of cargo in commercial vessels. Operational requirements that must be taken into consideration include, but are not limited, to: 1) ballasting; 2) washdown of dry-cargo residue as currently permitted by law; and 3) any other actions deemed necessary by the Master for the safety of the crew and vessel.

We would also like to again suggest that NOAA create two classes of National Marine Sanctuaries: biologically and culturally based. This approach allows NOAA, the Coast Guard and other regulatory bodies to issue and enforce regulations that are appropriate to each type of sanctuary.

Very Respectfully,

James H. I. Weakley
President

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