



Lake Carriers' Association

The Greatest Ships on the Great Lakes

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Via E-Mail: lesages@michigan.gov

Ms. Sarah LeSage
Michigan Department of Environmental Quality
P.O. Box 30458
Lansing, MI 48909-7958

Subject: Michigan Aquatic Invasive Species (AIS) State Management Plan (SMP)

Dear Ms. LeSage:

Thank you for the opportunity to review and comment on Michigan's AIS State Management Plan. Lake Carriers' Association (LCA) looks forward to being a resource to you and assisting in any way. We support its goals of preventing new AIS introductions and limiting the spread of AIS. LCA has been a leader, in fact a pioneer in such efforts. We first addressed AIS (the ruffe to be specific) almost 20 years ago. The U.S. Fish & Wildlife Service declared our voluntary ballast water management plan for the control of ruffe in Lake Superior ports to be "the cutting edge of technology." We followed that by partnering with the Northeast Midwest Coalition to do some of the first research into filtration of ballast water. Next came Best Management Practices (BMPs) for our members to employ during the shipping season. We even implemented a plan to respond to an outbreak of Viral Hemorrhagic Septicemia. Fortunately, perhaps due to the success of preventive measures, the emergency response section was never executed.

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. Those include 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, the vast majority contained within the Great Lakes from Lake Superior to Lake Erie. A recent study on the economic impacts of the cargos our members carried found they create and sustain 23,485 jobs in Michigan.

Further strengthening our ties and commitment to Michigan is the fact that seven of our members are based in the Wolverine State: Andrie, Inc. (Muskegon); Inland Lakes Management, Inc. (Alpena); Lake Michigan Carferry Service (Ludington); Pere Marquette Shipping Company (Ludington); Port City Marine Services and Port City Steamship Services (both Muskegon); and Soo Marine Supply, Inc. (Sault Ste. Marie).

This SMP focuses "on the prevention of new AIS to Michigan waters through interruption of the most significant vectors for new introductions" (pg. 12 of the SMP). It follows then that most references to maritime commerce refer to oceangoing vessels, as it is they who have, unintentionally for sure, introduced AIS to the Great Lakes. Our members confine their operations to the Great Lakes (most never sail farther east than Buffalo, New York), so would not have introduced AIS to this ecosystem.

Our BMPs are meant to limit the potential that our members' ballasting operations might spread AIS, but as the SMP further notes on pg. 18, "Limiting the dispersal of such [AIS] populations is problematic due to the numerous pathways of movement and the complex ecological characteristics associated with AIS populations. Human activities that contribute to the dispersal of AIS within Michigan waters include recreational boating, bait handling, habitat modification, and cultural practices."

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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.

The SMP also acknowledges that studies have confirmed that “populations of AIS are rarely, if ever, eradicated once they become established” (pg. 19). This fact is borne out by the migration of the ruffe along the southern shore of Lake Superior. This range expansion is independent of commercial navigation and BMP’s or ballast water treatment system would have little impact.

One strategic action recommended to achieve Objective A of the SMP (Prevent introduction of AIS through the development and implementation of state and federal ballast waer legislatin and regulation) is “Develop and issue a Section 401 Water Quality Certification for the U.S. EPA’s draft next VGP with conditions necessary to ensure ballast water and other discharges incidental to the normal operation of commercial vessels are protective of Michigan waters.” Michigan’s Section 401 Certification of the current VGP, and its state law regarding ballast water, does not require ballast water treatment systems on lakers and we recommend that be the case with the 401 certification for this next VGP. As you are likely aware, the draft of the next VGP does not require lakers that confine their operations to upstream of the Welland Canal to install a ballast water treatment system. The primary reasoning is that no systems are available that can accommodate lakers’ volumes (as much as 16.4 million gallons), flowrates (nearly 80,000 gallons per minute) and other factors such as the frigid water temperatures encountered at the open and close of navigation.

There is an even more compelling argument: Nothing in the record demonstrates that lakers’ ballast is harmful to the environment. (It is for that very reason that some have proposed that the EPA move its boundary for lakers to Anticosti Island.) It is logical then that Michigan’s Ballast Water Control General Permit and current Section 401 Certification only apply to oceangoing vessels and that should remain the case going forward.

The U.S. Coast Guard has just issued its Final Rule on ballast water and for the time being at least the regulations will not require lakers to treat their ballast, but rather continue to employ Best Management Practices and follow other prescriptions applied to all vessels in U.S. waters. The Coast Guard is continuing to assess the need for additional measures on lakers, but there is no timetable for issuance of new regulations or guidelines.

Even if a system was available that could treat lakers’ ballast, it is but one of many vectors for introduction and spread. In the Executive Summary the SMP lists six:

1. Maritime Commerce (ballast water and hull fouling);
2. Fishing and Aquaculture;
3. Canals and Diversions;
4. Trade of Live Organisms
5. Tourism; and
6. Development Activities

In our comments to the EPA on the next VGP we noted that the U.S. Geological Survey has identified no less than 64 vectors for introduction and spread (see Appendix A). Given that there are so many ways AIS can move about, we must question the value of requiring lakers to treat their ballast. The cost to retrofit our members’ vessels is estimated at nearly \$500 million (in 2012 dollars) and the systems used for estimating this cost cannot handle the flowrate at which lakers ballast, volumes involved, and temperature range among other inadequacies.

We hasten to note that while it is questionable if there is great value in treating lakers’ ballast, our members have not ruled out implementing additional measures. For example, one company has tested a system that could deliver a biocide (if one was approved) to ballast tanks as a sort of Rapid Response to detection of a new AIS. Several members are systematically raising the seachests on their vessels. This not only lessens the potential for drawing in bottom-dwelling fish, it lessens the amount of sediment taken in that could harbor other biota.

The SMP also discusses hull, anchor and superstructure fouling as a means of introducing and spreading AIS. The strategic action is to “identify and evaluate existing applicable legislation, regulations, and BMPs and evaluate the need for new efforts.”

Hull fouling as a vector for introduction via oceangoing vessels is a valid concern and it is fully addressed in the Vessel General Permit. Our members, too, are required to rinse the anchor, chain and locker. This ensures that any organisms are returned the environment from which they came and are not transported to another locale.

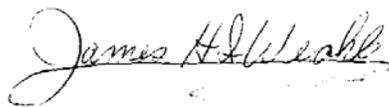
Hull cleaning is unnecessary on lakers. The season begins and ends in ice and plowing through a field 3-4 feet thick scrubs away any zebra mussels that might have hitched a ride on the hull, propellers or rudders. Furthermore, anything that attaches to our hulls is already present in the Great Lakes, and that brings us back to the issue of how many vectors in total there are for introduction and spread. In short, hull, anchor and superstructure fouling have been adequately addressed and no new efforts are necessary.

On more than one occasion the SMP calls for Michigan to support ... track ... promote... research on ballast water treatment, AIS.... We certainly endorse that. We understand how important tourism and recreation are to the state's economy. The SMP notes Michigan boasts more than 800,000 registered boats, the third highest total in the country, and according to a Great Lakes Commission study, those boaters spent \$3.9 billion on trip and equipment-related expenses, which supported roughly 51,000 jobs.

We ask that Michigan also support Great Lakes shipping with equal enthusiasm. It too is very important to the state's economy. Michigan has more deep-draft ports than the other seven Great Lakes combined. Calcite, Stoneport, Port Inland, Cedarville and Drummond Island combine to ship 80 or more percent of the limestone that moves on the Lakes in a given year. Alpena and Charlevoix are the hubs of the cement trade. Marquette and Escanaba account for a quarter of the iron ore shipped from U.S. Lakes ports.

A recent study on the economic impact of the Great Lakes-St. Lawrence Seaway System determined that the cargos our members carry to and from Michigan generate and sustain 23,485 jobs with an average wage of more than \$47,000, many of them at the mines, quarries, steel mills and cement plants served by lakers.¹ Efficient transportation is key to their continued success. Foreign countries are ready, willing and able to replace Michigan-mined iron ore or Michigan-made cement with their domestic production. LCA and its members would like to further enhance our partnership with you to keep Great Lakes shipping economically viable. Our environmental footprint is already the smallest of the all the modes of transportation. The next VGP and new Coast Guard regulations require treatment of ballast where it will do the most good - in the ballast tanks on oceangoing vessels.

Sincerely,



James H. I. Weakley
President

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¹ *The Economic Impacts of the Great Lakes-St. Lawrence Seaway System*, Martin Associates, October 2011.

Appendix A

Vectors for Introduction and Spread of Non-Indigenous Species Identified by U.S. Geological Survey

Accidental	Hitchhiker - Plants	Released – Packing Material
Canal	Hitchhiker - Platforms	Released - Pet
Dispersed	Hitchhiker - Scuba Gear	Shipping
Dispersed - Flood	Hitchhiker - Oysters	Shipping - Ballast Water
Dispersed - Ocean Current	Hitchhiker - Stocked Fish	Shipping - Hull Fouling
Dispersed - Waterfowl	Hitchhiker With Tunicates	Shipping - Solid Ballast
Escaped Captivity	Hybridized	Stocked
Escaped Captivity - Aquaculture	Ocean Currents	Stocked - Aquaculture
Escaped Captivity - Farm	Planted	Stocked - Aquarium
Escaped Captivity - Fur Farm	Planted - Erosion Control	Stocked - Escaped
Escaped Captivity - Pet	Planted - Food	Stocked - For Biocontrol
Escaped Captivity - Pond	Planted - Forage	Stocked - For Conservation
Escaped Captivity - Research	Planted - Ornamental	Stocked - For Exhibit
Escaped Captivity - Zoo	Planted - Restoration/Mitigation	Stocked - For Food
Gulf Stream Drift	Planted - Wildlife Habitat	Stocked - For Forage
Hitchhiker	Released	Stocked - For Research
Hitchhiker - Fishing, Boating	Released – Aquarium	Stocked - For Sport
Hitchhiker - Aquaculture	Released - Bait	Stocked - Illegally
Hitchhiker - Aquatic Plants	Released - Fish Food	Stocked - Misidentified
Hitchhiker - Imported Logs	Released - Biocontrol	Stream Capture
Hitchhiker - Imported Plants	Released - Food	Unknown
Hitchhiker - Packing Material	Released - Lab Animals	

Source: U. S. Geological Survey database Great Lakes Aquatic Non-Indigenous Species Information System