

## Alliance for the Great Lakes \* Save the River

February 3, 2016

Conference of Great Lakes and St. Lawrence Governors and Premiers  
Attn: Maritime Comments  
20 North Wacker Drive, Suite 2700  
Chicago, Illinois 60606

Re: Conference of Great Lakes and St. Lawrence Governors and Premiers Maritime Transportation System Strategy

On behalf of the Alliance for the Great Lakes and Save the River, thank you for the opportunity to provide feedback on the Draft Strategy for the Maritime Transportation System, released January 4, 2016. We believe our region's strong maritime history creates an excellent opportunity to strengthen a sustainable connection between our communities, the Great Lakes, and the industries that depend on them. These links are crucial to creating an ethic of care both for the Lakes and their residents.

We would also like to thank the Conference for providing the Alliance for the Great Lakes the opportunity to participate on the advisory committee on this topic. Through this participation, the Alliance has been able to voice our perspective on a number of issues, including system governance, local relevance, financing, and invasive species. We appreciate the desire, expressed in the strategy, to recognize an integrated Maritime Transportation System (MTS) in the Great Lakes, and see significant potential gains that could sprout from such an approach. However, we also see a missed opportunity to include in that integration a holistic vision for a sustainable navigation system that will support both the economy and environment of the Great Lakes region over time. The draft strategy focuses too heavily on increasing efficiencies of the current system at the expense of preparing the Great Lakes for tomorrow's economic and environmental realities.

The objective of doubling maritime trade and supporting the region's industrial core while at the same time shrinking the environmental impact of the region's transportation network are not individually problematic, but fail to gel as a vision for a sustainable MTS that grows over time. Taken in full, the recommendations of this strategy, such as increasing efficiency, reducing costs, building new markets, and growing economic activity around the maritime system, focus predominantly on conventional stability and limited growth of existing commerce. There is limited consideration both of new business lines, and how social and environmental restoration and protections can grow and integrate with the MTS.

The strategy does offer initiatives that should serve as starting point and core, instead of a side issue, for the shift to sustainability. These include a move toward short sea-shipping and cruise ships, increased fuel efficiency, reduced air emissions, and others. To fulfill their potential, these initiatives should be measured by their environmental benefits in addition to their cost savings. For example, while increasing fuel efficiency can reduce fuels costs, it can also reduce the amount of greenhouse gases, particulate matter, and toxic pollutants released into the atmosphere if increased efficiency improvements focused on higher functioning engines and alternative fuels.

These sustainable development concepts, however, do not reflect the overall themes of the strategy. When placed in the context of an expanded shipping season, potential high risk cargoes, disproportionate investment burdens, outdated water level regulations, and the continued risk of invasion from aquatic invasive species, we do not believe that this draft strategy reflects a sustainable vision, and is missing principles of sustainable development, such as corporate social responsibility, adaptive management or full-cost allocation. The strategy does not adequately reflect the responsibility of commercial navigation to reduce its environmental burden on the region, and contains limited new information, recommendations or solutions to solving environmental and social problems directly caused by commercial navigation operations on the Great Lakes and St. Lawrence River.

The following are specific concerns:

### **1. Seasonality of Shipping Season**

The strategy states that ice coverage on the Great Lakes stops or reduces shipping, “costing” the shipping industry money, due to lost activity. While ice coverage on the Lakes is increasingly unpredictable in an era of shifting climate patterns, the importance of ice on many sensitive Great Lakes ecosystems should not be understated. The economic impact of healthy ecosystems, and the sport and commercial fisheries that accompany them, should be considered in the calculations of ‘costs’ to the navigation industry. Additionally, shoreline erosion and damage from ice breaking in nearshore and river ecosystems can have significant impacts on ecologically sensitive and economically valuable areas. Additionally, the strategy’s claims of a smaller environmental footprint, due to increased efficiency, change substantially when ice breaking is used to facilitate passage. Early and late season navigation has resulted in some scenarios where ships must be escorted by an ice breaker for part or all of a journey. The use of an additional vessel clearly reduces the overall fuel efficiency of navigation. When looking at ice breaking vessels independently, the high level of energy needed to break through heavy Lake and River ice also weakens the argument of fuel efficiency. Any scenarios that involve ice breaking should be transparent about decreased fuel efficiency. Finally, with the large variation in ice coverage, many areas of the Lakes are facing increased periods of high evaporation during ice free winter months. This increased evaporation, combined with projected lower lake levels from climate change, may put the navigation industry in a challenging position of reducing cargoes, eliminating outmoded ships, and losing ports if it does not focus on evolving with the ecosystem. In general, ice breaking should be constrained by a requirement of protecting public ecological resources rather than simply maximized as proposed in the Strategy.

### **2. Investments Needed for Infrastructure**

Even with the current shipping season, the strategy recommends investing in numerous pieces of infrastructure including additional locks, dredging key harbors, and improving select ports. While maintaining existing infrastructure is important to the daily functioning of the industry, authorizing new public expenditures on this infrastructure should involve balanced economic analysis and public participation. We have concerns with directing significant new investment toward the MTS without a clear vision of how the system will evolve as a sustainable one that moves more than low-value bulk commodities. Additionally, the strategy’s statement of shipping operating under capacity may not be due to the lack of investment in infrastructure but instead to inherent incompatibilities with the rapidly changing global shipping industry. Before new investment from public or private sources are made in a MTS that functions on a publicly held resource such as the Great Lakes, we support exploration into alternative, job creating industries that can accomplish similar objectives.

### **3. Risk Assessment of New Cargoes**

Another area the strategy highlights as a potential growth driver for the MTS is the variety of new potential cargoes. For a system that has largely depended on commodities such as iron ore, the attraction of new cargoes such as crude oil has led to speculation of new markets. While advocates point to the potential job growth from new facilities to process, transfer, and ship commodities such as crude oil, a full evaluation of the environmental risk must be done before new cargoes are incorporated into the MTS. Hazardous and toxic substances that would have little to no chance of recovery in a spill, potentially devastating ecological impacts and further embed a reliance on fossil fuels in the Midwest are not an appropriate growth market for Great Lakes shipping.

### **4. Naturalized Water Levels for Navigation and Habitat Restoration**

An additional area of imbalance between economic growth in the MTS and ecological recovery of the Great Lakes and St. Lawrence River is that of habitat loss and species decline due to unnaturally regulated water levels. Due to navigation and hydroelectric power production, various locations throughout the Lakes have artificial water level controls in place. Recognizing the ecological and economic impact of these controls, the International Joint Commission (IJC), the binational organization responsible for overseeing the water levels of the St. Lawrence River and Great Lakes, has been studying, developing and modifying plans for a new method of regulation since 2000. In 2015, the IJC officially recommended a plan to the Canadian and American governments for Lake Ontario and the St Lawrence River. This plan, called Plan 2014, would both continue to moderate the high and low levels of lake water but also begin to restore over 60,000 acres of wetlands damaged by the current water level regulations. To achieve true sustainability in the ecosystems and communities along the St Lawrence and Lake Ontario, this strategy should support the findings and recommendations of Plan 2014 as well as the further study of water levels on the Upper Lakes. By supporting modern and restorative water level regulations, the MTS can incorporate the needs of water bodies and shorelines on which their industry depends.

### **5. Continued Risk for Invasion of Aquatic Invasive Species**

Finally, for this strategy to truly balance the potential for economic growth with a reduction in ecological harm, it must make stronger steps to eliminate the risk of invasion from aquatic invasive species. The strategy points out that open ocean ballast water exchange has reduced, but not eliminated, this risk, and stops short of identifying methods or an imperative to eliminate this risk. As the ecosystems of the Great Lakes continually change from warming waters, changing ice cover and lake levels, increased nutrient pollution, and other challenges, the introduction of new invasive species could have unforeseen consequences. Aquatic animals, bacteria, and viruses found in ballast water that have high tolerances for salinity, for example, could survive open ocean ballast water exchange and be released into the Great Lakes. The strategy should make a commitment that aspires to the elimination of new ballast-mediated invasions in the Great Lakes. Without such a commitment the MTS will never be truly sustainable.

In conclusion, to reach its full potential as a holistic strategy for an economically and ecologically sustainable maritime transportation system, we feel that the final version of this strategy must address the matters of an extended shipping season, responsible evaluation of the justification of investments in infrastructure, transparent risk assessment for new cargoes, recognition of the importance of more naturalized water levels, and the continued risk of invasion from aquatic invasive species. In so doing, and combined with the implied environmental benefits of increased fuel efficiency and reduced air emissions, the Maritime Transportation System Strategy could become a first step towards a new navigation system in the Great Lakes for the 21<sup>st</sup> Century.

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