



Michigan Agri-Business Association

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The Michigan Agri-Business Association is collecting comments in support of proposed rulemaking (USCG-2013-0954) for the United State Coast Guard (USCG) to allow River Barges with a conditional exemption from load line requirements, onto the Calumet-St Joe, Calumet-Muskegon routes, as well as the ports of Holland and Grand Haven.

If you would like to submit a comment on behalf of your business or association in support of this petition, you can submit comments through MABA and we will submit them to the USCG. You have three options:

1. Email your comment to alex@miagbiz.org
2. Fax your comment to the MABA office at (517) 336-0227
3. Mail your comment to the MABA office:
1501 North Shore Drive, Suite A
East Lansing, MI 48823

Be sure to discuss how this issue will directly impact your business or association.

Note: The deadline for public comments has not been set, but final comments should be submitted as soon as possible.

You can submit your comments directly to the U.S. Coast Guard by following the instructions on the last page of this document.

If you have any questions or would like assistance drafting your comment, please contact Alex McClung at alex@miagbiz.org or at (517) 336-0223.

TALKING POINTS: Opening Barge Access and Creating Opportunity for Michigan Agriculture

As Michigan agriculture expands, infrastructure to market Michigan products needs to grow as well. Expanding barge access on Lake Michigan is a forward-looking, safe and efficient way to do that.

- Right now, river barges aren't allowed to operate on the Eastern shore of Lake Michigan. That's because a Coast Guard regulation requires "load line inspections" that effectively bar them from doing so.
- The Coast Guard required these additional inspections for river barge operation on Lake Michigan before modern technology, better weather forecasting and stronger vessels made river barge operation an option on Lake Michigan.
- Today, allowing river barges to operate as far north as Muskegon would open new markets for Michigan producers and make them more cost competitive – ultimately further strengthening agriculture and creating jobs in our state.

Expanded river barge access would create a new way for agriculture and other non-agricultural businesses across Michigan to move goods.

- For agriculture, the benefits are clear and wide-ranging. Agriculture would have easier and more cost-competitive access to export markets. This measure would also open new avenues to bring fertilizer and feed ingredients to Michigan to meet production needs.
- Expanded barge access would lower costs across the supply chain by providing an option to costly road transportation.
- Agriculture is but one industry that would make use of this opportunity. Aggregates, metal and scrap industries, as well as utility generators and others would have a new and cost-effective way to ship and receive products.
- Supply and service companies will create additional business opportunities if this proposal comes to fruition. Tug operators, dock owners and potentially new shippers would add good, local jobs as a result of increased shipping activity.

The original Coast Guard regulation was a well-intentioned safety measure – but with today's advanced technology, it isn't necessary. River barge operation on Lake Michigan is safe.

- Safety is a primary concern for the maritime community and agriculture.

Our business community supports robust efforts to protect the Great Lakes from invasive species, such as Asian Carp.

- Michigan's agriculture sector is committed to growing our economy while protecting our Great Lakes from damage caused by invasive species.
- We will continue to support research and solutions that keep invasive species out of the Great Lakes without disrupting or halting the tourism and shipping industries that are critical pieces of our Midwest economy.



Re: Coast Guard Proposed Rulemaking USCG-2013-0954

I am writing in support of proposed rulemaking (USCG-2013-0954) for the United State Coast Guard (USCG) to allow River Barges with a conditional exemption from load line requirements, onto the Calumet-St Joe, Calumet-Muskegon routes, as well as the ports of Holland and Grand Haven.

As Michigan agriculture expands, infrastructure to market Michigan products needs to grow as well. Expanding barge access on Lake Michigan by granting exemption from load line inspection requirements is a forward-looking, efficient and safe way to do that.

Expanded river barge access would streamline the way that agriculture operates and markets products – and it would benefit non-agricultural businesses across Michigan’s economy. Agriculture would have an easier and more cost-competitive pathway to export markets, as well as a new pathway to import fertilizer and feed ingredients to meet production needs. Other businesses would benefit as well. Aggregates, metal and scrap industries, as well as utility generators would have a new and cost-effective method to ship and receive products.

Finally, I believe this is a safe and appropriate measure. The original Coast Guard regulation was a well-intentioned safety measure – but with today’s advanced technology, it isn’t necessary. River barge operation on Lake Michigan is safe.

Additional comments:

Thank you for considering my comment in support of USCG conditional exemption of load line requirements for barges on Lake Michigan.

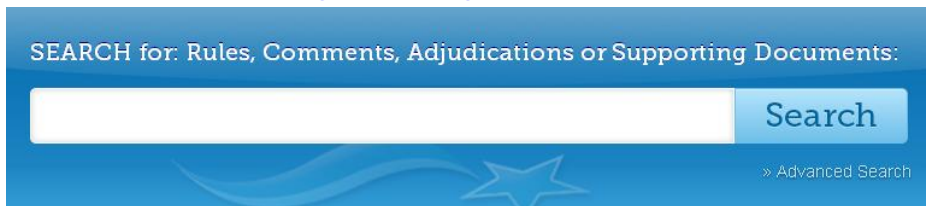
Name:

Address:

Email:


USCG Public Comment Process

1. Go to www.regulations.gov

A screenshot of the search bar on the regulations.gov website. The bar is blue with a white search input field. Above the input field, it says "SEARCH for: Rules, Comments, Adjudications or Supporting Documents:". To the right of the input field is a blue "Search" button. Below the input field, there is a link that says "» Advanced Search". The background of the bar features a stylized blue wave and a star.

2. In the “Search for:” box (pictured above), type our docket number:
USCG-2013-0954

A screenshot of the featured search result for docket ID USCG-2013-0954. The result is titled "Lake Michigan - Petition for Rulemaking" in blue text. Below the title, it says "Agency: COAST GUARD (USCG)" and "Summary: Lake Michigan - Petition for Rulemaking". To the right of the title, there is a link that says "Open Docket Folder" with a folder icon. A large black arrow points to this link. The entire result is enclosed in a light blue box with rounded corners.

3. Click “Open Docket Folder” from the featured search result (Pictured above).
4. Under “Primary Documents,” find the document that’s titled “Michigan Agri-Business Association – Petition for Rulemaking”
5. Click the box: 
6. At this step you can submit your comment by either typing it into the comment box, or uploading a document to the page.
7. Click “Continue” and follow the instructions on the website.
8. Please email questions to Alex McClung in the MABA office at:
alex@miagbiz.org