



United States Coast Guard
Docket Management Facility (M-30)
U.S. Department of Transportation
West Building, Ground Floor, Room W12-140
1200 New Jersey Avenue, S.E.
Washington, DC 20590-0001

August 11, 2008

Dear United States Coast Guard:

Mayors and local officials of the Great Lakes and St. Lawrence Cities Initiative (Cities Initiative) are committed to the protection of the Great Lakes and St. Lawrence River, a system that is essential to the livelihood of millions across the basin. The Cities Initiative believes that in order to protect and restore this vast freshwater system we must continue the trend of the last thirty years of reducing discharges into the Lakes and River. For this reason, we submit the following comments on the Draft Environmental Impact Statement: U.S. Coast Guard Rulemaking for Dry Cargo Residue Discharges in the Great Lakes and Notice of Proposed Rulemaking, USCG-2004-19621 (EIS). More specifically, our concerns regarding dry cargo residue discharges are as follows: 1) the discharge of waste, including coal, iron ore and limestone residue, into the lakes, is unacceptable; 2) the EIS sets a poor precedent for the general stewardship of the Lakes and River; and 3) U.S. national and international laws prohibit the dumping of dry cargo residue.

The USCG received a 15 year exemption for the dumping of dry cargo residue in 1993. The proposed rule would extend this exemption to allow more operational waste to accumulate in the Great Lakes. The EIS states that the dry cargo residue “impacts are not considered significant,” however, the amount of residue that has been deposited into the Lakes since the practice began in the 1930’s is unknown and the impacts of the discharge on the habitat are neither well researched nor well understood.¹ Uncertainty remains as to whether the residue fully dissolves into the water and as to the effects the residue has on the ecosystem, especially as discharge accumulates over time. Of particular concern is the fact that the waste discharged into the lakes contains toxic metals that can harm wildlife, as well as people who eat fish potentially contaminated by the metals.

¹ U.S. Coast Guard Draft Environmental Impact Statement for Dry Cargo Residue Discharges in the Great Lakes, USCG-2004-19261.

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Local governments invest billions of dollars annually to protect and restore the Great Lakes and St. Lawrence River. Mayors have a significant stake in this system which provides drinking water to millions of people, supports recreational activities and is essential to local economies throughout the basin. The Cities Initiative urges USCG to invest in alternatives to ensure the Great Lakes environment is not sacrificed and that a disturbing precedent of increasing discharges into the Lakes is not set. There are existing technological alternatives and equipment available to limit dry cargo dumping. The EIS contemplates a standard that endangers the Great Lakes unnecessarily.

Furthermore, United States and international law prohibit the dumping of dry cargo residue in all internal waterways. Dry cargo sweeping is illegal under the International Convention for the Prevention of Pollution from Ships which all ships are subject to under the 1987 Act to Prevent Pollution from Ships. The practice is also inconsistent with U.S. obligations under the Great Lakes Water Quality Agreement, Annex V.

For the above reasons, the Cities Initiative does not support the proposal to extend the exemption on dumping dry cargo residues.

Thank you for taking our comments into consideration. If you have any questions, please do not hesitate to contact me at 312-201-4516.

Sincerely,

David A. Ullrich
Executive Director

The Great Lakes and St. Lawrence Cities Initiative is a bi-national coalition of 56 mayors and other local officials that works actively with governments and stakeholders to advance the protection and restoration of the Great Lakes and St. Lawrence River.

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