

June 6, 2005



To: Sustainable Development Strategy Team of the Great Lakes Regional Collaboration
From: Jennifer Nalbene, Great Lakes United

Alternative Transportation Report of the Sustainable Development Strategy Team

On behalf of the Great Lakes United coalition, I participated on the Transportation drafting team of the Sustainable Development Strategy Team. We appreciate the many hours of hard work volunteered by the drafting team co-chairs and members during calls, face-to-face discussions and attempts to craft a consensus product. Having reviewed the drafting team's report dated 5/24/05, Great Lakes United is submitting an alternative report articulating points on which consensus has been reached, points of disagreement, and possible alternatives raised by Great Lakes United not taken up by the team as a whole.

Coalition member, the National Wildlife Federation-Great Lakes Program Office has reviewed and supports this alternative report.

Overall, Great Lakes United has a fundamentally different view on what should have been the overall approach taken by the Sustainable Development – Transportation drafting team. We believe the primary driver for our collective work should have been identifying transportation development recommendations that clearly restore or protect the basin ecosystem – recommendations in direct support of intentions of the Great Lakes Regional Collaboration. To this extent, we believed that our charge was to identify changes to current, and opportunities for future, transportation operations that would directly benefit the ecosystem, as well as identify the economic benefits associated with such developments. The power of such a restricted interpretation would have been the unified endorsement of specific economic development opportunities that benefit the Great Lakes ecosystem. As currently drafted, all recommendations benefit and promote transportation development, but benefit to the Great Lakes ecosystem is inconsistent.

It is our concern that a similar approach may have been taken within other Sustainable Development drafting teams. We strongly encourage all drafts emerging from the Sustainable Development drafting teams, as well as the final collective document, be critiqued carefully to ensure that all recommendations advance the protection and restoration of the Great Lakes ecosystem.

Action points from the Sustainable Development – Transportation draft report which Great Lakes United endorses, and consequently the Sustainable Development Transportation drafting team reached consensus, include the following:

- **Aquatic Invasive Species:** Great Lakes United endorses Action #1, which emphasizes the need to eliminate the introduction and spread of invasive species via maritime commerce and other transportation modes. We strongly urge the endorsement by the Sustainable Development Strategy Team of recommendations emerging from the Aquatic Invasive Species Strategy Team.
- **Intermodal planning:** Great Lakes United endorses Action #2, which emphasizes the need for a comprehensive intermodal transportation plan incorporating both the economic needs of the North American mid-continent and the environmental protection and restoration of the Great Lakes/St. Lawrence ecosystem.

Action points from the Sustainable Development – Transportation draft report which Great Lakes United is near endorsement, include the following:

- **Short Seas Shipping:** Action #4 promotes short sea shipping in the Great Lakes/St. Lawrence Seaway System to relieve congestion and to reduce air emissions in heavily used railroad and highway corridors in the region.

We stress the need for language describing the ecological constraints within which short-seas shipping can be developed. It is essential to ensure development of short-seas shipping does not promote more ocean-ship access and subsequent introduction of more invasive species, and should not come at the expense of other environmental considerations, such as aquatic habitat protection or restoration of natural flow regimes.

- Additional actions recommended in the draft report (# 3,5,6,7) hold significant promise to protect and restore the Great Lakes, however, need further development and specific information provided in order for endorsement. One particular note, due to the expertise and make-up of the drafting team, recommendations emerging were predominantly focused on the movement of freight by commercial vessels. However, rail and truck commerce as well as air transportation (personal and commercial) and personal transportation were identified as needing significantly more attention.

Issues of disagreement, include the following:

- **New deepening:** Great Lakes United does not believe that under any circumstance, deeper commercial navigation channels will protect or restore the Great Lakes – St. Lawrence River ecosystem. Given the significant historical modifications of the Great Lakes – St. Lawrence River system to allow for commercial navigation operation, it is our strong position that future development should be made within

the confines of the systems current configuration, and ultimately the parameters set by the natural system.

- **Statistics:** Great Lakes United raised numerous questions in regards to the combination of statistics resulting in confusing or misleading descriptions of the value, transits, volume by tonnage and type of maritime commerce operating in the Great Lakes and St. Lawrence Seaway (pages 3-4). In general, we are also concerned with the incomplete description of costs and benefits for all modes, and the inconsistent use and accuracy of statistics across all modes.

Issues which Great Lakes United recommended but were not significantly taken up by the drafting team include the following:

- **Transshipment:** The unique access to the Great Lakes through a choke-point, presents opportunities for progressive new ways to operate the system that will facilitate international trade movement, provide potentially significant new development opportunities and keep out aquatic invasive species from the whole ship vector. Great Lakes United raised operational modifications to prevent aquatic invasive species introductions, such as restricting ocean-going vessels and transferring goods into the basin. Pursuing this option would require research and investment to create a cargo transfer station on the St. Lawrence River and/or to improve inter-modal transportation networks in the Great Lakes to sustain trade.
- **Climate change:** Mentioned briefly in the Transportation draft, Great Lakes United stressed the need for an in-depth investigation of ways for commercial navigation to adapt to lowering water levels and repercussions of climate change. Specifically we recommended the development of adaptive management strategies and the identification of alternatives beyond dredging (policies, incentives, operational changes etc), that give the shipping industry flexibility to continue to do business if water levels drop. Motivation for this recommendation includes the potential that costs, both economic and environmental, of dredging to maintain the current draft depth may exceed benefit in future climate change scenarios.
- **Tax reform:** Mentioned briefly in the Transportation draft, tax reform holds the potential to foster sustainable development in the Great Lakes region, and in effect, could promote the most fuel-efficient means of transporting bulk goods and develop possible alternatives for the industry if lake levels lower as a result of climate change. The development of tax reform options could substantially promote a transition towards sustainability, and merit much greater attention. Examples of tax reforms that Great Lakes United identified as promising include:
 - Shifting of fuel taxes- promoting fuel efficiency across all modes of commercial transportation and planning for the impacts of a changing climate; and
 - Transportation User Fee for Larger Ships- promoting shallower draft vessels which would require less dredging (reducing the ecological impact as well as the economic cost of dredging).

Thank you for the opportunity to work within the Transportation drafting team and contribute an alternative report to the Sustainable Development- Transportation draft report. I look forward to opportunities to further refine the draft report in the upcoming months. Please do not hesitate to contact me with any future questions.

Sincerely,

Jennifer Nalbone
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Great Lakes United