



UNITED STATES GREAT LAKES
SHIPPING ASSOCIATION

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July 21, 2008

Docket Management Facility (M-30)
U.S. Department of Transportation
West Building Ground Floor – Room W12-140
1200 New Jersey Avenue, SE
Washington, DC 20590-0001
VIA FAX to 202/493-2251

RE: U.S Coast Guard Docket No.
USCG-2004-19621

The United States Great Lakes Shipping Association is a trade association consisting of U.S. vessel agent companies which serve primarily foreign flag vessels calling at Great Lakes ports. These comments are respectfully submitted to the subject Docket in connection with the USGC Proposed Rulemaking and associated Draft Environmental Impact Statement with regard to Dry Cargo Residue ("DCR") discharge in the Great Lakes.

COMMENT 1 – MAPPING DESIGNATED AREAS

It is noted that one of the features of the USCG approach is the identification of six (6) new sensitive geographic areas whereby DCR will be regulated. These areas are currently described only by written map coordinates in the documentation. It is suggested that either in any Executive Summary, in an Appendix or elsewhere in the existing documentation, an actual map or maps be provided showing

- 1) Any sensitive areas previously designated and
- 2) The six new sensitive areas now so designated

By using actual maps, possibly overlays and/or distinguishing colors as to what commodities are covered and where, a reader can more effectively understand the size and scope of the newly defined areas as well as see any differences from previously identified areas.



2.

COMMENT 2 – MANDATORY RECORD KEEPING

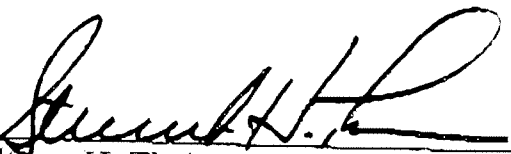
At a Public Meeting conducted by USCG regarding the subject Docket on July 17, 2008, in Cleveland, Ohio, Lake Carriers' Association delivered oral testimony which, among other things, questioned the utility and scope of the new record keeping requirements in the proposed form as well as it representing an undue burden on operators which already are required to manage and file an ever growing number of reports and records to be kept for government compliance. Our organization agrees with the Lake Carriers' observations. As many seek to attract greater use of our waterways to alleviate the burdens of truck and rail operations, increased paperwork is just another negative element to bringing new commerce to our region.

We suggest that the utility of the information obtained or using it as a compliance tool is doubtful on balance. We suggest that if some record needs to be made, steps be taken to simplify things further. Log book entries subject to inspection may suffice.

We appreciate the opportunity to provide these comments. Should you have any questions or require anything further, contact numbers are included with this document.

Respectfully submitted,

UNITED STATES GREAT LAKES SHIPPING ASSOCIATION

By 
Stuart H. Theis, Executive Director