

Proposed DNR Vessel Permit Language Raises Concerns

By Andy Lisak

We understand the tremendous value of the Great Lakes to the State of Wisconsin, and especially to our community, as an environmental and economic resource.

Superior's maritime industry provides over 2,000 direct and indirect well-paying jobs to members of the community and creates an economic impact of over \$200 million per year. Superior's waterfront businesses provide over \$3 million in property tax (or equivalent) payments and approximately \$1.2 million in occupational tax payments.

So naturally we are very concerned when well-intentioned efforts to protect this resource could have a very negative economic impact on our community.

Last month, the Wisconsin Department of Natural Resources released proposed language for a vessel permitting program aimed at preventing the introduction and spread of aquatic invasive species carried in the ballast tanks of ocean going vessels ("Salties") visiting Wisconsin waters and ports.

The permit will require Salties to install technology to treat ballast water to a standard that is 100 times and in some cases 1000 times the standards established by the International Maritime Organization (IMO) and five other Great Lakes states including Minnesota. In addition, the Wisconsin permit will require Salties visiting Wisconsin waters and ports to implement the technology in 2012; four years before Minnesota's rules take effect. Technology does not exist that can meet these more restrictive standards nor are protocols available to test at 100 times, let alone 1000 times IMO standards.

We are also concerned because Wisconsin's permit will put it at odds with most other Great Lakes states, which have adopted IMO standards with a 2016 implementation date, and will create a patchwork of inconsistent ballast water regulations within the Great Lakes.

Most importantly, we are concerned that if Wisconsin's permit is enacted it could put Wisconsin ports at a competitive disadvantage, which could result in the loss of jobs for the port communities and the loss of tax revenue for cities, counties and the state. Superior, since it is Wisconsin's largest port and shares a common harbor with Duluth, could bear the highest cost of this policy. The negative economic impact on Superior could be great if the proposed permit is adopted and Salties stop visiting our port and simply sail to Duluth and other ports where regulations are deemed more reasonable.

Most people agree that aquatic invasive species are a serious issue. However, it is unproductive for Wisconsin to impose a permit regime that is: inconsistent with Minnesota (a state in which it shares the Duluth-Superior Harbor); could put Superior at a competitive disadvantage in attracting international trade; and could cause economic harm.

During a time of national recession and a record state budget deficit, the last thing Wisconsin should do is enact regulations that could result in the loss of jobs and tax revenues.

The Development Association, along with vessel operators, Wisconsin port communities, maritime businesses, labor unions and allied industries, is asking the Wisconsin DNR to adopt permitting regulations for Salties that are consistent with standards mandated by IMO and those imposed by the states of Minnesota, Illinois, Indiana, Ohio and Pennsylvania. For more information on the proposed DNR vessel permit, go to www.developmentassociation.com.

Andy Lisak is the executive director for The Development Association. The Development Association, a public-private partnership with over 150 members, is the lead economic development organization for Superior and Douglas County.