

# MUSKEGON COUNTY

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# MICHIGAN

February 25, 2014

**Board  
of Commissioners**

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Admiral Robert Papp, Jr.  
Commandant  
United States Coast Guard  
2100 Second St, SW  
Washington, DC 20593

Re: Coast Guard Proposed Rulemaking USCG-2013-0954

The Board of Commissioners of the County of Muskegon, Michigan is 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. Joseph, Calumet-Muskegon routes, as well as entry into the ports of Holland and Grand Haven.

As the State of Michigan's largest deep water port on Lake Michigan, this rulemaking change will allow the Port of Muskegon to enhance economic opportunity for Michigan manufacturers and agricultural producers. Muskegon is also strategically located in mid-Michigan and is served by several modes of transportation, allowing for easy logistical connections to the Port of Muskegon.

This rulemaking change will level the playing field, allowing the State of Michigan to directly compete with Indiana and Wisconsin for expanded barge access to Lake Michigan by granting conditional exemption from load line requirements, allowing Michigan and the Port of Muskegon to have restrictions similar to those states.

With this exemption, the agricultural industry will 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. Additionally, aggregate producers, alternative energy component manufacturers, utility generators, and the metal and scrap industries would have a new and cost-effective method to ship and receive products.

Finally, with advances in weather forecasting, revised regulations would ensure vessel, operator and cargo safety, making river barge operation on Lake Michigan safe and reliable.

Thank you for considering these comments in support of a conditional exemption from load line requirements for river barges on the eastern side of Lake Michigan.



Kenneth Mahoney, Commissioner  
Chairman of the Board  
Muskegon County Board of Commissioners



Terry Sabo, Commissioner  
Chair, Port Advisory Committee  
Muskegon County Board of Commissioners