



## **Wisconsin Economic Development Association Inc.**

March 24, 2009

Mr. Paul Luebke  
WI Dept. of Natural Resources  
101 S. Webster St.  
PO Box 7921  
Madison, WI 53707-7921

### **RE: General Permit No. WI-0063835-01-0 for Ballast Water Discharges, and Environmental Assessment of the Proposed Action**

Dear Mr. Luebke:

On behalf of the Wisconsin Economic Development Association (WEDA), a statewide organization of approximately 450 economic development professionals, we are writing to convey concerns relating to the proposed DNR rules relating to a vessel permitting program.

The Great Lakes are a unique environmental and economic resource to Wisconsin and we share and understand that protecting the Great Lakes ultimately benefits us all, but the proposed rules regarding ballast water will put Wisconsin at a competitive disadvantage with other Great Lakes ports in an already difficult economy.

WEDA believes that Wisconsin's ballast water standards for ocean going vessels should be consistent with our neighboring states, including Minnesota and Illinois, who have adopted the standards established by the International Maritime Organization (IMO) with an implementation date of 2016. If Wisconsin's permit is enacted as drafted we will likely see those international cargoes go to Duluth or Chicago, which could result in lost jobs in our port cities as well as lost revenues for those municipalities and the state.

In addition, Wisconsin's agricultural and manufacturing industries that compete in a global economy and use the ports to ship their goods will likely see their transportation costs increase as they are forced to use truck or rail longer distances to find an alternative port. Increasing the costs for these important Wisconsin industries will make it more difficult for them to compete in an already very competitive marketplace and Wisconsin's economy will continue to suffer.

During these unique economic times, we believe that Wisconsin leaders should be working with the business community to make Wisconsin an attractive place to do business. The proposed rule on ballast water discharges does just the opposite. We respectfully urge you to reconsider the proposed rule to make it more consistent as it pertains to ocean-going vessels with what our neighboring states have enacted as well as other Great Lakes states.

Feel free to contact me at 262-796-6694 or [Drinan@ci.brookfield.wi.us](mailto:Drinan@ci.brookfield.wi.us) if you have questions.

Sincerely,

A handwritten signature in black ink, appearing to read 'Patrick Drinan', with a stylized flourish at the end.

Patrick Drinan  
President