

February 22, 2018

The Honorable Rodney Frelinghuysen
Chairman
House Committee on Appropriations
H-305, The Capitol
Washington, DC 20515

The Honorable Thad Cochran
Chairman
Senate Committee on Appropriations
S-128, The Capitol
Washington, DC 20510

The Honorable Nita Lowey
Ranking Member
House Committee on Appropriations
1016 Longworth HOB
Washington, DC 20515

The Honorable Patrick Leahy
Ranking Member
Senate Committee on Appropriations
S-146A, The Capitol
Washington, DC 20510

Dear Chairmen Frelinghuysen and Cochran and Ranking Members Lowey and Leahy:

We are writing to express our strong support for Title VIII of S.1129, the Coast Guard Authorization Act of 2017, the bipartisan Vessel Incidental Discharge Act (VIDA). Our organizations represent U.S. and international vessel owners and operators; fishing vessel, passenger vessel and charterboat operators; labor unions; marine terminals and port authorities; national business organizations; and industries that rely on maritime shipping to transport essential cargoes in domestic and international commerce.

VIDA is the product of bipartisan leadership and negotiation to construct a framework that will protect our waterways, foster efficient and cost-effective maritime commerce, and maintain appropriate roles for the Coast Guard, EPA and states. It is imperative that this legislation be enacted without further delay. We respectfully urge you to include VIDA in the upcoming 2018 omnibus spending package.

VIDA, which currently has 23 bipartisan Senate cosponsors and 37 bipartisan House cosponsors, would eliminate a regulatory burden hindering interstate and international commerce by replacing a patchwork of federal and state regulations with uniform national standards for the regulation of ballast water and other discharges incidental to normal vessel operations. The bill would also maintain protective measures jointly undertaken by industry and federal agencies to reduce the movement of invasive species on the navigable waterways.

Without VIDA, commercial vessel owners will spend millions of dollars installing onboard equipment to comply with Coast Guard and EPA requirements, but still be at risk of fines and penalties for violating state requirements that cannot be met by existing technology. This overlapping patchwork of federal and state regulations kills jobs, undermines the efficiency of maritime transportation, increases business costs, and places mariners at risk of civil and criminal prosecution. It also delays investments in treatment technology that will strengthen environmental protection.

VIDA would provide vessel owners and mariners with a predictable and transparent regulatory structure in which vessel incidental discharges are regulated and enforced by the U.S. Coast Guard, using as its baseline the ballast water discharge standard that EPA's Science Advisory Board has determined to be the most stringent currently achievable. The bill will ensure the

installation of high-performing technologies on commercial vessels, and allows for improvements in the national standard as technology improves. VIDA also preserves the ability of states to enforce the federal ballast water discharge standard, petition for a higher standard, work with Coast Guard to develop best management practices, and regulate recreational vessels operating in their waters.

VIDA will also permanently exempt fishing vessels and vessels under 79 feet from EPA's National Pollutant Discharge Elimination System permit program. These vessels have been operating under a series of temporary exemptions enacted by Congress. Permanent relief is needed for the operators of these vessels, as long-term regulatory certainty is needed for the operators of large commercial vessels.

VIDA will strengthen protections for America's waterways, provide a stable regulatory structure for interstate and international maritime commerce, and eliminate needlessly duplicative regulatory programs. Please include VIDA in the 2018 omnibus spending package.

Respectfully,

ADM
AccuTrans, Inc.
AEP River Transportation
AK Steel
Alabama Charter Fishing Association
Albany Port District Commission
American Association of Port Authorities
American Commercial Barge Line LLC
American Fuel & Petrochemical Manufacturers
American Great Lakes Ports Association
American Institute of Marine Underwriters (AIMU)
American Iron and Steel Institute
American Maritime Congress
American Maritime Officers
American Maritime Officers Service
American Petroleum Institute
American Petroleum Tankers
American President Lines, LLC
American River Transportation Company
American Roll-on Roll-off Carrier (ARC)
American Steamship Company
American Tunaboat Association
Amherst Madison, Inc.
Andrie Inc.
ArcelorMittal USA
Armstrong Steamship Company
Associação de Armadores da Marinha do Comércio
Atlantic Intracoastal Waterway Association
At-sea Processors Association
Avalon Freight Services
Bahamas Shipowners Association

Bay Shipbuilding Company
Baydelta Maritime
Bay-Houston Towing Company
Beach Haven Charter Fishing Association
Bell Steamship Company
Benchmark Marine Agency
Blessey Marine Services, Inc.
Borghese Lane LLC
Bren Transportation Corp.
Brown Water Marine Service, Inc.
Buffalo Marine Service, Inc.
C & J Marine Services, Inc.
C&M Shipping & Trading Agency, Inc.
Callais & Sons, LLC
Calumet River Fleeting, Inc.
Campbell Transportation Company, Inc.
Canal Barge Company, Inc.
Canfornav Ltd.
Cape Cod Charter Boat Association
Carmeuse Lime and Stone
Central Boat Rentals, Inc.
Central Dock Company
Central Marine Logistics
CGBM 100, LLC
Chamber of Marine Commerce
Chamber of Shipping (Canada)
Chamber of Shipping of America
Channel Design Group
Charterboat Association of Puget Sound
Chicago & Western Great Lakes Port Council, MTD, AFL-CIO
Chicago Sportfishing Association
Chincoteague Island Charterboat Association
City of Superior, Wisconsin
Cleveland-Cuyahoga County Port Authority
Cliffs Natural Resources Inc.
CN, Duluth, MN
ConocoPhillips
Consumer Energy
Consumer Energy Alliance – Midwest
C-PORT, Conference of Professional Operators for Response Towing
Crouse Corporation
Crowley Maritime Corporation
Cruise Lines International Association
CSX Transportation, Toledo Docks
Cyprus Shipping Chamber
D & S Marine Service, L.L.C.
Daniels Shipping Service
Dann Marine Towing, LC
Dann Ocean Towing, Inc.

Deloach Marine Services
Detroit-Wayne County Port Authority
Devall Brothers Barge Line II, LLC
Devall Brothers Towing II, LLC
Devall Commercial Barge Line, LLC
Devall Diesel Services, LLC
Devall Enterprises, LLC
Devall Offshore Barge Line, LLC
Devall Offshore, LLC
Devall Resources, Inc.
Devall Third Generation Towing, LLC
Devall Towing & Boat Service of Hackberry, L.L.C.
Dock 63
Donjon Marine Co., Inc.
Donjon Shipbuilding & Repair
Dredging Contractors of America
DTE Electric Co.
Duluth Seaway Port Authority
Durocher Marine
E Squared Marine Service, LLC
E.N. Bisso & Son, Inc.
Eastern Lake Erie Charterboat Association
Edw. C. Levy Co.
Ergon Marine and Industrial Supply
Erie-Western Pennsylvania Port Authority
European Community Shipowners' Associations
Evansville Marine Service, Inc.
Faroese Merchant Shipowners Association
Faulkner, Hoffman & Phillips
Fednav Ltd.
Fishing Vessel Owner's Association
Florida Guides Association, Inc.
Foss Maritime Company
Fraser Shipyards
General Marine Services LLC
Genesee Charter Association, Inc.
Global Marine Transportation, Inc.
Golden Gate Fishermen's Association
Golding Barge Line, Inc.
Grand River Navigation Company
Great Lakes District Council-ILA, AFL-CIO
Great Lakes Dredge & Dock Company, LLC
Great Lakes Fleet
Great Lakes Maritime Task Force
Greater Point Pleasant Charter Boat Association
Gulf Intracoastal Canal Association
Hackberry Land, LLC
Hallett Dock Company
Harbor Towing & Fleeting, LLC

Harley Marine Services
Hawaii Resource Group LLC
Higman Marine Services, Inc.
Homer Charter Association
Hong Kong Shipowners Association
Hughes Bros., Inc.
Huntington District Waterways Association
ILA Lake Erie Coal & Ore Dock Council
ILA Local 1317
ILA Local 1768
Illinois Chamber of Commerce
Illinois International Port District
Illinois Marine Towing, Inc.
Indian National Shipowners' Association
Indiana's North Coast Charter Association
Ingram Barge Company
Inland Lakes Management
Inland Marine Service
Int'l Association of Machinists & Aerospace Workers District Lodge 1943
Int'l Association of Machinists & Aerospace Workers District Lodge 4
Int'l Association of Machinists & Aerospace Workers District Lodge 60
Int'l Association of Machinists & Aerospace Workers District Lodge 65
Int'l Association of Machinists & Aerospace Workers District Lodge 98
Integrity – Black Lake Fleeting Services, LLC
Integrity Terminal and Marine Services, LLC
International Association of Drilling Contractors
International Association of Machinists & Aerospace Workers
International Brotherhood of Boilermakers
International Chamber of Shipping
International Longshoremen's Association
International Organization of Masters, Mates & Pilots
International Shipmasters' Association
International Shipmasters' Association (St. Catharines ON)
International Union of Operating Engineers, Locals 49, 139, 150 and 324
InterShip, Inc.
INTERTANKO
Irish Chamber of Shipping
J&J Maritime Operators, LLC
Jacksonville Marine Transportation Exchange
James Transportation, LLC
JANTRAN, Inc.
Japanese Shipowners' Association
JB Marine Service, Inc.
JEFFBOAT LLC
Juneau Charter Boat Operators Association
K&L Gates LLP
Kindra Lake Towing, LP
Kirby Corp.
Lake Carriers' Association

Lake Erie Ship Repair & Fabrication
Lake Michigan Carferry Service
Lakes Pilots Association
LeBeouf Bros. Towing, LLC
Liberian Shipowners' Council Ltd
Liberty Maritime Corporation
Lorain Port Authority
Louisiana Association of Waterways Operators and Shipyards
Luedtke Engineering Company
M&P Barge Company, Inc.
Maersk, Inc.
Magnolia Marine Transport Co.
Maine Association of Charter Captains
Manatee County Port Authority
Marco Island Charter Captains Association
Marine Engineers' Beneficial Association
Marine Tech
Maritime Association of the Port of New York-New Jersey
Maritime Institute for Research and Industrial Development
Maritime Port Council of Greater NY/NJ & Vicinity
Maritime Trades Department, AFL-CIO
Marquette Transportation Company, Inc.
Maryland Charterboat Association
Maryland Port Administration
McAllister Towing
MCM Marine
Metal Trades Department, AFL-CIO
Michigan City Charterboat Association
Michigan Maritime Trades Port Council, MTD, AFL-CIO
Midwater Trawlers Cooperative
Midwest Energy Resources Company
Mississippi Charter Boat Captains Association
Montana Coal Council
Moran Iron Works
Moran Towing Corporation
Muskegon Port Advisory Committee
National Association of Charterboat Operators
National Association of Manufacturers
National Association of Maritime Organizations
National Association of Waterfront Employers
National Grain and Feed Association
National Mining Association
Navy League of the United States
New York Shipping Association
Norfolk Southern Corporation
Norfolk Tug Company
North Pacific Fishing Vessel Owners Association
Northeast Charterboat Captains Association
Northern Neck Charter Captains

Northwest Marine Trades Association
Octopus Towing LLC
Ogdensburg Bridge and Port Authority
Osborne Concrete & Stone Co.
Overseas Shipholding Group (OSG)
P&M Marine Services LLC
P&R Water Taxi LLC
Panama City Boatmen Association
Parker Towing Company, Inc.
Passenger Vessel Association
Pere Marquette Shipping Company
Petersburg Charterboat Association
Philadelphia Regional Port Authority
Polsteam USA Inc.
Port City Marine Services, Inc.
Port City Steamship Holding Company, Inc.
Port of Green Bay
Port of Milwaukee
Port of Monroe, Michigan
Port of Oswego Authority
Ports of Indiana
Prince William Sound Charter Boat Association
Progressive Barge Line, Inc.
Ryba Marine Construction Company
Saltchuk
Sause Bros.
SCF Marine Inc.
Seabulk Towing
Seafarers International Union
Shipping Federation of Canada
Singapore Shipping Association
Soo Marine Supply, Inc.
Southern Offshore Fishing Association
Southern Towing Company
Spanish Shipowners' Association
Spliethoff
St. Lawrence Seaway Pilots Association
Steel Manufacturers Association
Tata Steel
Ten Mile Exchange LLC
Terral River Service, Inc.
Texas Waterways Operators Association
The American Waterways Operators
The Interlake Steamship Company
The King Co.
The Port of New Orleans
The Royal Association of Netherlands Shipowners
The Vane Brothers Company
Tidewater Barge Lines, Inc.

Toledo-Lucas County Port Authority
Toledo Port Council, MTD, AFL-CIO
TPG Chicago Dry Dock
TradeWinds Towing LLC
Transportation Institute
Trojan Technologies Inc.
Turn Services, LLC
U.S. Chamber of Commerce
U.S. Steel Corporation
UK Chamber of Shipping
Union of Greek Shipowners
United Boatmen of New Jersey
United States Great Lakes Shipping Association
United Steelworkers, District 1, AFL-CIO-CLC
United Steelworkers, Local 5000
Upper River Services, LLC
VanEnkevort Tug & Barge Inc.
Verplank Dock Co.
Victoria Fleet, LLC
Virginia Charter Boat Association
Virginia Maritime Association
Wagenborg Shipping North America
Water Quality Insurance Syndicate
Waukegan Charter Boat Association
Wepfer Marine Inc
West Dock and Market – Port of Muskegon
WESTAR Marine Services
Western Great Lakes Pilots Association, LLP
Western States Petroleum Association
Westport Charter Association
Wilmington Tug, Inc.
Wood Towing, LLC
World Shipping Council
World Shipping Inc.