



**Western Great Lakes
Pilots Association**

PO Box 365
6559 S M-221
Brimley, MI 49715
www.wglpa.com

January 17, 2020

Rep. Jack O'Malley, Chairman
House Transportation Committee
S-1385 House Office Building
PO Box 30014
Lansing, MI. 48909

Dear Rep. O'Malley,

Western Great Lakes Pilots Association is the group of ship pilots that the Federal Government has recognized as the organization to provide pilotage service for the foreign-flagged ships that visit the Great Lakes in our district, namely Lakes Superior, Huron, Michigan and the St. Mary's River, including the Soo Locks.

Pilotage of foreign-flagged vessels on the Great Lakes is an important function provided by men who have years of experience sailing on the largest fresh-water sea in the world. Every one of those ships has either an American or Canadian Pilot on board to assist with and/or direct the navigation of the vessel. There is a good reason for this; the safety of the boating public, other shipping interests, infrastructure and the environment are too valuable. We are the only people on board these ships who live and recreate in this area, and therefore we have the greatest interest in protecting it. Of the 18 Federal Registered Pilots and 6 Applicant Pilots in our district, 19 live in Great Lakes states, and 15 of them are Michigan residents. We truly have a vested interest in the safety and environment of these waters.

The Great Lakes Pilotage Act of 1960 established two distinct categories of pilotage on the Lakes. In "Designated Waters," the pilot on board must direct the navigation of the ship. In other words, be on the navigational bridge, and in control of the navigation duties. In waters that are "Undesignated," the pilot must be on board the ship, and be available to assist in navigating the vessel. The Great Lakes were divided into "Designated" and "Undesignated" waters by President Dwight D. Eisenhower and there have been no significant changes since that date.

As the Chairman of the Transportation Committee, you may be interested to know that the Straits of Mackinac fall into the category of "Undesignated Waters." This means that the Federal Registered Pilot or Canadian Pilot (who is already on board the ship) does not need to be involved in navigating the ship as it passes through the Straits of Mackinac. It surprises many people when they find out, that although an experienced pilot is on board the ship, he is not required to direct the navigation in the most confined area in our district. And to add to the argument, in the pristine waters of the Straits, cruise ships, fishing boats, cargo ships, tank vessels, tugs and barges, pleasure boats and the Mackinac Island ferries are all converging in those waters. Now add some restricted visibility caused by fog (not an uncommon occurrence) and most people think the most experienced navigator with the most local knowledge should be the one tasked with navigating the ship. Yet this is not the case.

The cost of pilotage service is borne by the shipping companies. The taxpayers of the State of Michigan do not pay for our services. They receive the benefit of our services, but they are not charged for them. The shipping companies pay our costs, and the rates are set by the U.S. Coast Guard, not by the pilots.

Some people have argued that changing the Straits to "Designated Waters" would raise the rates that shippers pay to have their ships trade upon the Great Lakes, and that this would be a deterrent to international trade. But changing the designation does not require any rate increase. In fact, the Director of Great Lakes Pilotage has publicly stated that it will not. But even if it did, is the profitability of foreign shipping companies operating on the Great Lakes more important than protecting the safety and environment of the largest body of fresh water in the world?

I am asking you to join in the effort to get the Straits of Mackinac changed from "Undesignated" to "Designated" waters. If I may be of any assistance to you in this action, please contact me.

Thank you for your time.

Sincerely,



Capt. Jon H. Olney, President
Western Great Lakes Pilots Association

Olney.jon.wglpa@gmail.com

231-631-6466