



June 3, 2002

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Docket Management Facility (USCG-2001-10486) - 13
U.S. Department of Transportation, Room PL-401
400 Seventh Street SW
Washington DC
20590-0001

02 JUN -3 AM 10:48
DEPARTMENT OF TRANSPORTATION

fax: (202)-493-2251

Re: (USCG-2001-10486) "Standards for Living Organisms in Ship's Ballast Water Discharged in U.S. Waters"

To whom it may concern:

I am writing on behalf of Great Lakes United regarding the U.S. Coast Guard request for comments on ballast water treatment standards. Great Lakes United is an international coalition of over 150 environmental, conservation, hunting and fishing groups, unions, academia and businesses in the U.S., Canada, First Nations and Native American tribes dedicated to the protection and restoration of the Great Lakes-St. Lawrence River basin. Great Lakes United has been involved in the development of effective and environmentally sound regional strategies to prevent exotic species introductions through our participation on the Great Lakes Aquatic Nuisance Species Panel.

Great Lakes United supports the U.S. Coast Guard Goal 1, modified to better reflect the intent of this needed goal. Suggested edits are in italics.

"Remove, kill or inactivate vertebrates, invertebrates and photosynthetic organisms (including holoplanktonic, meroplanktonic, and demersal zooplankton, phytoplankton and propagules of macroalgae and aquatic angiosperms) inclusive of all life-stages. For bacteria, Enterococci and Escherichia coli will not exceed 35 per 100 ml and 126 per 100 ml of treated water, respectively."

We stress the value of examining environmentally sound methods of drinking water treatment (as implied in Goal 2, "treat for living organisms at least to the same extent as drinking water") in order to achieve this goal. While we believe ballast water discharges should be as biologically inactive as drinking water, we are not supporting Goal 2 because it would require the unnecessary removal of sediment and biologically inactive organic and inorganic material prior to discharge.

An international coalition to conserve and protect the Great Lakes/St. Lawrence River ecosystem

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Further, we stress the need to establish a very aggressive timeline to achieve Goal 1. In 1999, the binational Great Lakes United coalition passed a resolution establishing a 5-year timeline for ballast water treatment and recommended that the federal governments of U.S. and Canada:

- Establish and implement scientifically defensible standards for ballast water discharge that will eliminate the risk of new introductions of exotic species.
- Require that ships built after 2004 meet these standards.
- Lead a coordinated, vigorous research program to design and retrofit ships.

In accordance with this resolution we maintain that the risk of new introductions should be eliminated beginning in 2005. Due to frustratingly slow progress to date, this goal appears to be far reaching; however we are confident that if ballast water treatment research and implementation were given a top priority, this goal could be met.

Great Lakes United recommends a rapid establishment of interim standards, reviewed frequently for improvement, in order to achieve this goal. Regarding the U.S. Coast Guard's "possible standards" we anticipate shortcomings with all approaches. Establishment of standards should not favor one technology over another, though we maintain that environmentally sound treatment (as defined in the National Invasive Species Act) precludes the extensive use of biocides. Establishment of standards based on percent reduction may or may not reduce or eliminate risk of introductions, due to variable concentrations of unknown species in any given ballast tank. Establishment of standards based on potential invaders deemed high-risk species implies that we know all of the high-risk species, which is untrue.

Despite these shortcomings in setting standards, we offer the following recommendations:

- The U.S. Coast Guard immediately engage in the development of interim standards, with rapid ramp-up to achieve the stated goal.
- Standards should have a biological basis, aimed at fully protecting the Great Lakes from any new introductions of invasive species originating from the ballast water of ships.
- Initial interim standards should be established that are better than ballast water exchange and no less environmentally sound (regarding discharge of toxins and toxic residuals).
- Incentive packages should be developed for the shipping industry that engages in testing, modifying and implementing technology.
- The federal government should establish ballast water treatment as a top priority, as aquatic exotic species introductions are permanent and seriously threaten the natural value and heritage of the United States. To this end, we recommend that the federal government not rely on industry to lead the development of ballast water treatments and technologies. The federal government must engage in much more aggressive and organized research and on-board experimentation to achieve Goal 1.

Thank you for this opportunity to comment to the U.S. Coast Guard's request for comments regarding ballast water treatment standards. This letter has been submitted via fax and mail.

Sincerely,



Jennifer Nalbone