



United States Department of the Interior

U.S. FISH AND WILDLIFE SERVICE

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Celebrating a Century of Conservation!

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Docket Management Facility, USCG-2001-10486 - 24
U.S. Department of Transportation
Room PL-401
400 Seventh Street SW
Washington, DC 20590-0001

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DEPT OF TRANSPORTATION

Dear Sir/Madam:

This is in response to a request for comments on Standards for Living Organisms in Ship's Ballast Water Discharge in U.S. Waters published in the Federal Register dated March 4, 2002. In my position as fishery biologist for the U.S. Fish and Wildlife Service (Service), I am chairperson of the Ruffe Control Committee and serve as the Service's representative on the Great Lakes Regional Panel on Aquatic Nuisance Species, both of the National Aquatic Nuisance Species Task Force. These comments reiterate and update past comments offered by the Service and others on this same topic.

Since the 1800s, at least 160 non-indigenous aquatic organisms have become established in the Great Lakes. Although the rate of new introductions has slowed since the 1980's when measures to control introductions increased, non-indigenous species introductions continue to occur in the Great Lakes. The economic and biological adverse impacts of non-indigenous species have been enormous, including extirpation or severe depletion of lake trout, massive ecological shifts, expensive control costs incurred by industry, and degradation of sport and commercial fisheries. The Great Lakes Fishery Resources Restoration Study report to Congress, prepared by the Service in 1995 pursuant to the Great Lakes Fish and Wildlife Restoration Act, identified the introduction of non-indigenous species as one of the major impediments to restoring the fishery of the Great Lakes, and recommended that public agencies and non-governmental organizations take action to "close the door" on non-indigenous species introductions. The most common single mechanism for entry of non-indigenous species into the Great Lakes has been by way of the ballast water of ships.

Goal: The Service supports the efforts of the U.S. Coast Guard to prevent the introduction of additional non-indigenous species to the United States in the ballast water of ships. A standard for ballast water discharge needs to be implemented as soon as possible based on the best available research and technology. In practice, the Service supports a modification of the proposed ballast water standard goal.

That modification is: *No discharge of viable vertebrates, invertebrates, zooplankton 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.* The Service recognizes that existing infrastructure and technology does not allow this goal to be reached immediately. However, as the knowledge base of aquatic nuisance species invasion and treatment technologies expands, an interim standard set today should be as technologically and feasibly strong as possible.

**Standard:** The Service recommends that the physical size limit of organisms targeted for removal from ballast water be biologically based. Research to determine this size should be conducted. In the interim until those data are available, the best available technology should be used to determine the standard. As new information becomes available on new threats, advancements in technology, and effectiveness in reducing or eliminating the risk posed by invasive species in ballast water discharge, the standard set today should be revisited annually to determine if the standard can be tightened.

I appreciate the opportunity to provide these comments.

Sincerely,



Mark P. Dryer  
Project Leader