



DEPT. OF TRANSPORTATION
ROCKETS

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June 3, 2002

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Commandant (G-C)
United States Coast Guard
2100 Second Street, S.W.
Washington, D.C. 20593-0001

USCG-2001-10486-26

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MARGARET M. GRANT
Executive Director

Subject: Department of Transportation
Coast Guard
33 CFR Part 151, (USCG-2001-AG21)
*Standards for Living Organisms in Ship's Ballast Water
Discharged in U.S. Waters*

Dear Admiral Collins:

During the Council of Great Lakes Governors 2001 Annual Meeting, we the Great Lakes Governors and Premiers, created a task force charged with developing options for a consistent and coordinated approach to stopping ballast water introductions of exotic species in the Great Lakes and St. Lawrence Seaway Region (Basin). One of the most critical issues facing the Basin is the introduction and spread of aquatic nuisance species (ANS), which has caused significant economic losses and ecological disruption. The current regulatory regime and voluntary efforts do not effectively preclude new introductions of ANS or dispersal within the Great Lakes.

As stewards of the Great Lakes, we believe a regional and bi-national approach focused on the treatment of ballast water should be comprehensive and environmentally effective. It is also incumbent upon us to endorse a goal now of no new introductions via ballast water and minimize the spread of existing ANS within the Great Lakes Basin. Recognizing that such a goal is not immediately achievable because of the limitations of existing technology, we endorse a stepwise approach to implementation that results in progressively tighter compliance over time. It is envisioned that all carriers discharging ballast water in the Basin will need to apply the best available technology to meet the standard.

The Coast Guard is on the front line of this battle, and we encourage you to provide the strong leadership necessary in the fight against non-indigenous species into the Great Lakes and the St. Lawrence Seaway. In response to your request for comments on the *Standards for Living Organisms in Ship's Ballast Water Discharged in U.S. Waters*, we believe that the recommended standards presented in the Federal Register do not fully meet our

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need of a goal of a zero discharge that will result in a strong national ballast water management program. Although we support current ballast water exchange (BWE) measures as an interim measure, ultimately a standard should be based on the effectiveness toward meeting the goal of zero discharge. Developing a standard only to be as effective as ballast water exchange may not be sufficient in meeting our goal. The standard should force the issue of developing new and improved technologies that apply to all biological organisms from macro- to microscopic taxa. In addition, the standard should address treatment of residual sediment and water in the vessels reporting no ballast water on board.

Each of our appropriate state agencies have been encouraged to communicate with you independently to answer the six questions you pose in the Federal Register. We look forward to working with you in the future, and please contact Deborah Jackson with the Council of Great Lakes Governors, with any questions at (312) 407-0177.

Sincerely,



John Engler
Governor of Michigan
Project Chairman

cc: Bob Taft, Governor of Ohio, Council Chairman
George Ryan, Governor of Illinois
Frank O'Bannon, Governor of Indiana
Jesse Ventura, Governor of Minnesota
George E. Pataki, Governor of New York
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