

The "do nothing alternative," though an important part of any analysis, clearly does not apply with regard to ballast water management based on case history of environmental impacts from past oversight due, in part, to the lack of advanced technological knowledge. Even the Proposed Action Alternative described on page 36 (Table 2) indicates the potential for an adverse environmental impact to organisms due to salinity and temperature. Perhaps this alternative can be supplemented by the development of an action strategy. To facilitate this, an inter-agency/interested party telephone conference committee could be coordinated. In addition, a grant/prize could be awarded to anyone who could remediate the problem. Even I have two ideas that could revolutionize the industry, so consider the concerted efforts of the great inventors of the world! With regard to violations, will there be a "flat fee" or a "weighted fee," based on amount of ballast water, ship size, or economic considerations? Of course, incurring a large "flat fee" would be onerous to the small mercant vessel owners and incurring a small "flat fee" may not be worth the associated hassle of compliance to some large vessel operators. Should a fund supported from violation fees be set up to remediate past and future ballast water-related impact areas? Should "spot check" surveillance become an intensive routine? How many repeated violations would lead to further punitive action? Should these discharges also be regulated by the USEPA NPDES Program? Your document claims that you do not plan to hold a public meeting unless an explanation of its benefit is provided. It has been my experience that the public has played an important role in many of the major developments of all phases of environmental management. Certainly, the USCG in its newly designated role of support of Homeland Security, can justify holding a public meeting regarding an issue that is definitely in the public interest. By so doing, I am sure that your excellent program will become even better!