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Regional Citizens' Advisory Council / "Citizens promoting environmentally safe operation of the Alyeska terminal and associated tankers."

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October 28, 2003

MEMBERS

- Alaska State Chamber of Commerce
- Alaska Wilderness Recreation & Tourism Association
- Church Alaska Corporation
- City of Cordova
- City of Homer
- City of Kodiak
- City of Seldovia
- City of Seward
- City of Valdez
- City of Whittier
- Community of Chenega Bay
- Community of Tatitlek
- Cordova District Fishermen United
- Kodiak Peninsula Borough
- Kodiak Island Borough
- Kodiak Village Mayors Association
- Oil Spill Region Environmental Coalition
- Prince William Sound Aquaculture Corporation

Docket Management Facility (USCG-2003-14273) -29  
Department of Transportation, Room PL-401  
400 Seventh Street SW  
Washington, DC 20590-0001

Sent via fax to the Docket Management Facility: 202-493-2251

SUBJECT: Docket No. USCG-2003-14273 – Mandatory Ballast Water Management Program for U.S. Waters

2003 OCT 29 A 11:50  
DEPT. OF TRANSPORTATION  
DOCKETS

Dear Sir or Madam

The Prince William Sound Regional Citizens' Advisory Council (PWSRCAC) is an independent non-profit corporation whose mission is to promote environmentally safe operation of the Valdez Marine Terminal and associated tankers. Our work is guided by the Oil Pollution Act of 1990 and our contract with Alyeska Pipeline Service Company. PWSRCAC's 18 member organizations are communities in the region affected by the 1989 Exxon Valdez oil spill, as well as commercial fishing, aquaculture, Native, recreation, tourism and environmental groups.

The potential for invasion by non-indigenous marine species into Prince William Sound and other Alaskan waters through crude oil tanker ballast water discharges has been a priority issue for PWSRCAC since 1996 when we first commented on the National Invasive Species Act of 1996. In other regions like the Great Lakes and the Black Sea, it has been well documented that invading organisms have caused economic chaos and destroyed commercial and recreational fishing economies.

PWSRCAC, in partnership with governmental agencies and industry, has been supporting invasive species research conducted by the Smithsonian Environmental Research Center for the last several years. This research has shown that at least 15 non-indigenous species have already been introduced into Prince William Sound.<sup>1</sup>

We appreciate the opportunity to comment on the above referenced proposed rulemaking. We have two comments to offer.

<sup>1</sup> *Biological Invasions of Cold-Water Coastal Ecosystems: Ballast-Mediated Introductions in Port Valdez/Prince William Sound Alaska*, Smithsonian Environmental Research Center, 2000. Report can be found at <http://www.pwsrac.org/projects/mis.html>.

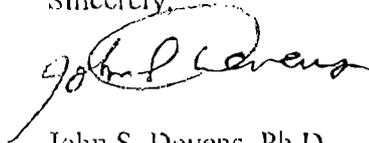
- 1) We support the proposal to make the voluntary Ballast Water Management (BWM) guidelines mandatory. As ballast water movement is known to be an important vector in the transfer of potentially harmful organisms, it is important for the USCG to have an adequate tool to evaluate ballast water management practices aboard ships. The voluntary management plan is not providing that tool.
- 2) However, a much more important issue for our region is the fact that the National Invasive Species Act of 1996 exempted the voluntary ballast exchange/mandatory reporting requirements for crude oil tankers in the coast-wise trade. This was very alarming to us, given that Port Valdez is frequented on a regular basis by oil tankers and is the recipient of the third-largest volume of ballast water of any U.S. port.

This exemption ignored two important possibilities: 1) that organisms indigenous to other U.S. ports could invade Prince William Sound through ballast water with potentially detrimental effect; and 2) that many domestic U.S. ports are thoroughly invaded by exotic organisms from foreign countries, allowing ample opportunity for exotic species to be introduced into Prince William Sound by tankers sailing from these domestic ports<sup>2</sup>.

The mandatory BWM proposal will do little to reduce the overall risk of invasions in coastal Alaskan waters. Although the notice of proposed rulemaking is limiting in addressing the Alaskan oil-tanker exemption, we want to be on record regarding the severe inadequacies of this exemption to our region. Our worst fear is that a harmful invasion from one of our domestic ports could very well occur in Alaska, and could have been prevented through coast-wise ballast water management practices.

We very much appreciate the opportunity to review and provide comments on this notice of proposed rule making.

Sincerely,



John S. Devens, Ph.D.  
Executive Director

Cc: Richard Ranger, Alyeska Pipeline Service Company  
PWSRCAC NIS Working Group  
Dr. Anson Hines, Smithsonian Environmental Research Center  
Gary Sonnevil, USF&WS  
Denny Lassuy, USF&WS

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<sup>2</sup> *Stemming the Tide: Controlling Introductions of Nonindigenous Species by Ships' Ballast Water*. National Research Council, 1996.