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Ohio Department of Natural Resources

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October 20, 2003

Docket Management Facility (USCG-2003-14273) - 38
U.S. Department of Transportation, Rm. PL-401
400 Seventh Street SW
Washington, DC 20590-0001

ATTN: RIN 1625-AA52

Dear Sirs:

Thank you for the opportunity to comment on the proposal to enact a mandatory ballast water management program, as published in the July 30, 2003 issue of the Federal Register (Vol. 68, No. 146), RIN 1625-AA52. I am writing to express the support of my agency for the proposed rules.

The intended purpose of the proposed rulemaking, eliminating introduction of non-native aquatic nuisance species (ANS) from ballast tanks of incoming vessels, addresses one of the most important natural resource management issues facing the United States. Continued introductions of ANS have had enormous economic consequences. Estimates of costs related to ANS control range from tens to hundreds of billions of dollars annually. Clearly, ANS-related economic damage dwarfs the estimated 10-year present value cost of enacting the proposed rules (\$116.7 million).

The biological damage caused by ANS is immeasurable. Aquatic ecosystems throughout the United States have been fundamentally, and in many cases, irrevocably, altered by ANS. This has resulted in loss of native species and reduced productivity of these systems. In Ohio, many of our fisheries have been directly impacted by ANS, thus causing us to focus an increasing large proportion of our limited management resources toward mitigating ANS-related impacts.

Because most ANS are difficult to control, and almost impossible to eradicate, once they become established, preventing their introduction is a primary focus of current management strategies. Ballast water introductions likely are the single most important conduit for ANS introductions to the United States. As such, other ANS control strategies will continue to be hampered until this primary source is eliminated.

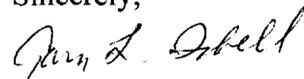
Docket Management Facility

October 20, 2003

Page 2

Managing ANS is a complex endeavor; success will ultimately require cooperation between public and private entities, both in the United States and internationally. We encourage the U.S. Coast Guard (USCG) to exercise its full authority toward aggressive and decisive action to limit introduction and spread of ANS. Enacting these proposed rules would be an excellent step. Further, we would like to see the USCG continue work with shipping interests to develop safe, effective technology and practices for ballast water management to minimize non-compliance once these rules are enacted. It is only through a sustained, multi-faceted effort that we will realize progress in dealing with ANS.

Sincerely,



GARY L. ISBELL

Executive Administrator