

258413



Illinois Department of Natural Resources

One Natural Resources Way • Springfield, Illinois 62702-1271
217.785.0075 • <http://dnr.state.il.us>

Rod R. Blagojevich, Governor

Joel Brunsvold, Director

October 14, 2003

Docket Management Facility
(USCG-2003-14273) -39
U.S. Department of Transportation
Room PL-401
400 Seventh Street SW.
Washington, DC 20590-0001

Dear Sir:

We were pleased to learn that the U.S. Coast Guard is proposing to implement mandatory Ballast Water Management (BWM) procedures, currently in effect for the Great Lakes, to all U. S. Waters. The mandatory procedures currently in place for the Great Lakes provided some protection but they do not solve the problem of ballast water transfer of invasive species between ports within the Great Lakes. Also, these mandatory BWM procedures apply only to Great Lakes waters of the United States while in Canadian waters they are still voluntary. Procedures having voluntary compliance requirements have less of a compliance incentive. Similar vulnerabilities will exist when mandatory BWM procedures are in place for all waters of the United States. Vessels whose trips occur entirely within the Exclusive Economic Zone will be exempt from these procedures. Also, these procedures will not apply to the waters of Mexico and Canada.

To resolve these issues we would suggest that the US Coast Guard encourage both Mexico and Canada to adopt similar regulations, since an invasive species introduction could occur anywhere along the contiguous coast. We also would encourage the US Coast Guard to more aggressively develop standards for ballast water discharge. Establishment of standards for ballast water discharges would encourage the shipping industry to develop the appropriate technology for achieving those standards.

Illinois strongly supports the extension of mandatory BWM procedures to all U.S. waters. These regulations will help mitigate the introduction of aquatic invasive species into the Gulf of Mexico and the Mississippi River drainage. Since the Illinois River is an integral part of this watershed and provides a link to the Great Lakes the mandatory BWM procedures will be very helpful in preventing future aquatic invasive species from entering the Great Lakes through this pathway. Resolving the weakness inherent in the mandatory BWM procedures will be even more helpful in preventing aquatic invasive species from entering the Great Lakes.

Sincerely,

Joel Brunsvold
Director

cc: Mike Conlin
Tom Trudeau

2003 NOV - 3 P 2:41 PM
DEPT OF TRANSPORTATION
DOCKETS