



an international coalition to protect and restore
the Great Lakes / St. Lawrence River ecosystem

October 28, 2003

Docket Management Facility
U.S. Department of Transportation
Room PL-401
400 Seventh Street SW
Washington, DC 20590-0001

Re: Mandatory Ballast Water Management Program for U.S. Waters (proposed rulemaking:
USCG-2003-14273)

To Whom It May Concern:

I am writing on behalf of Great Lakes United to comment on the proposed rulemaking,
“Mandatory Ballast Water Management Program for U.S. Waters.”

Great Lakes United is an international coalition of approximately 200 environmental, conservation and sport organizations, tribes, municipalities, labor unions and businesses whose mission is to protect and restore the Great Lakes - St. Lawrence River basin ecosystem. A priority of the coalition is to stop aquatic invasive species introductions via ocean-going ships ballast tank discharges. To this end, we have been involved in the development of effective and environmentally sound regional strategies to prevent aquatic invasive species introduction and spread in the region, and have served as the only environmental representative to the Great Lakes Aquatic Nuisance Species Panel since 1996.

In this proposed rulemaking, the U.S. Coast Guard is “proposing to convert the voluntary ballast water management program into a mandatory ballast water management program” thereby increasing the Coast Guard’s “ability to protect against introductions of new non-indigenous species via ballast water discharge.” In the proposed rulemaking the Coast Guard notes that the mandatory ballast water management program proposed nationwide is already mandatory for vessels entering the Great Lakes.

Great Lakes United would like to provide the following general comments to the extension of mandatory ballast water program from the Great Lakes to the entire nation:

As ships classified as No Ballast On Board are exempt from mandatory ballast water exchange, and ballast water exchange is likely to be the most used ballast water management practice, a mandatory ballast water management program does not effectively stop or slow the introduction of non-indigenous aquatic invasive species from NOBOB ships. In the Great Lakes, a high percentage (approximately 80%) of ships entering are classified as NOBOB, and the mandatory

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ballast water management program has not slowed the rate of new introductions in general.

Given that ships classified as BOB constitute a higher percentage of vessels accessing coastal regions of the United States, and that mandatory ballast water management may reduce introductions from ships carrying ballast, we strongly support the extension of a mandatory ballast water management program to protect waters nationwide. However, we stress that a mandatory ballast water exchange program should not be considered a solution to the introduction of non-indigenous aquatic invasive species from the ballast tanks of ocean-going ships.

Great Lakes United would also like to stress that the establishment of a mandatory ballast water exchange program nationwide should not slow efforts to combat non-indigenous aquatic species introductions through the setting of ballast water discharge standards and the development and implementation of environmentally sound ballast water treatment technology. Specifically, the federal agency process of implementing a mandatory ballast water management program should be an additional responsibility of the U.S. Coast Guard, and efforts to implement a program should not predicate work to set standards, collect public comments, or oversee the implementation of ballast water treatment technology.

Thank you for the opportunity to comment, please feel free to contact me at any time if questions arise.

Sincerely,

A handwritten signature in black ink that reads "Jennifer Nalbhone". The signature is written in a cursive style with a long horizontal flourish extending to the right.

Jennifer Nalbhone
Habitat and Biodiversity Coordinator