



July 18, 2007

The Honorable James Oberstar  
2365 Rayburn House Office Building  
Washington, D.C. 20515

The Honorable Steven LaTourette  
2371 Rayburn House Office Building  
Washington, D.C. 20515

The Honorable John Mica  
2313 Rayburn House Office Building  
Washington, D.C. 20515

The Honorable Elijah Cummings  
2235 Rayburn House Office Building  
Washington, D.C. 20515

JIM DOYLE  
CHAIR  
*Governor of Wisconsin*

I am writing to you on behalf of the Council of Great Lakes Governors to again encourage Congressional action to curb the flow of aquatic invasive species (AIS) into our nation's waters, and particularly, into the Great Lakes.

ROD BLAGOJEVICH  
*Governor of Illinois*

AIS cost the nation billions of dollars in damages each year, are a burden on the economy and strain Great Lakes State budgets. They pose a threat to human health and cause immeasurable ecological damage. Further, AIS are injurious to our region's sport and commercial fisheries and associated tourism and recreation.

MITCH DANIELS  
*Governor of Indiana*

JENNIFER M. GRANHOLM  
*Governor of Michigan*

TIM PAWLENTY  
*Governor of Minnesota*

ED RENDELL  
*Governor of Pennsylvania*

ELIOT SPITZER  
*Governor of New York*

TED STRICKLAND  
*Governor of Ohio*

The problem of AIS continues to grow. In fact, in the months that have passed since our September 2005 request for comprehensive Federal invasive species legislation (attached), several new AIS have been discovered in the Great Lakes region alone. These include, for example, the bloody red shrimp (*Hemimysis anomala*), the New Zealand mudsnail and the fish disease viral hemorrhagic septicemia (VHS). Additionally, existing invasive species such as the quagga mussel have spread to Lake Superior and Lake Mead, illustrating how invasive species can move from one area of the country to another.

DAVID NAFTZGER  
*Executive Director*

Congressional action is long overdue. While State and regional actions against AIS remain critical to establishing a complete and protective framework, a coordinated and comprehensive national approach is the only long-term means of stopping new invasive species from penetrating the Great Lakes. The magnitude of this problem requires swift and strong legislation. Specifically, the Great Lakes Governors endorse S. 725, the National Aquatic Invasive Species Act of 2007.

The challenges to adopting comprehensive federal AIS legislation must be overcome. However, if enactment of legislation such as S. 725 is not possible in the near term, we favor acting now on ballast water management, which is the pathway by which most new invasive species enter the lakes. Toward this end, we commend the leadership of Congressman Oberstar and others for their recent actions. We must take bold steps as soon as possible.

35 East Wacker Drive  
Suite 1850  
Chicago, IL 60601

With regards to ballast water regulations, the Great Lakes Governors support legislation that would achieve the following:

Voice: 312-407-0177  
Fax: 312-407-0038  
Web: [www.cglg.org](http://www.cglg.org)  
e-mail: [cglg@cglg.org](mailto:cglg@cglg.org)

- Establishes an environmentally protective ballast water discharge standard for ocean-going vessels that includes the ultimate goal of zero discharge of viable organisms, a requirement for ships to meet the environmentally protective standard within five years, and a

- requirement to review the standard on a periodic basis both before and after the five-year period;
- Requires for all ocean-going vessels the immediate application of: 1.) best performing ship-board ballast water treatment, 2.) best residuals management practices such as ballast tank salt water flushing for vessels that declare “no ballast on board,” and, 3.) best hull management methods. Ships should be required to meet the environmentally protective ballast water discharge standard within 5 years, but preventive measures based on best available technology and management must be taken in the interim;
  - Reviews and implements best-performing ballast water management practices for non-ocean going vessels to address the spread of AIS already introduced into U.S. waters;
  - Clarifies the role of federal agencies, granting U.S. EPA the lead regulatory authority for defining environmentally protective discharge standards and best management practices and the U.S. Coast Guard the lead authority for enforcement;
  - Maintains the possibility of State action to improve on federal protections related to AIS. While a uniform federal regulatory process is necessary, it should not preclude the States from strengthening these protections as needed;
  - Maintains the possibility of using the Clean Water Act to regulate ballast water discharge from ocean going commercial ships,
  - Encourages Canada and the United States to work together by harmonizing ballast water regulations and treatment requirements;
  - Immediately and significantly expands the research, testing and evaluation of all treatment policies and technologies; and,
  - Supports information and education outreach programs to reduce the potential for AIS introductions.

We reiterate our concern with bills such as S. 1578 and H.R. 2830 that unnecessarily delay effective treatment technology requirements for ballast water discharges and propose express or implied preemption of the Clean Water Act and State authority. The principles outlined above and in our attached September 2005 letter must be incorporated and addressed for ballast water legislation to be truly effective and earn the support of the Great Lakes Governors.

Thank you for joining us in the ongoing battle to protect our economy and our nation’s waters from the harmful effects of AIS. Please contact David Naftzger, Executive Director of the Council of Great Lakes Governors, at 312-407-0177 if there are questions. We look forward to continuing to partner with you on this issue of national importance.

Sincerely,

A handwritten signature in black ink, appearing to read "Jim Doyle". The signature is written in a cursive, flowing style.

Governor Jim Doyle  
Chair, Council of Great Lakes Governors

CC: Great Lakes Congressional Delegation