

April 30, 2003

Public Comment for the Record
U.S. Commission on Ocean Policy
1120 20th Street, NW
Suite 200 North
Washington, D.C. 20036

Dear Commissioners,

Bluewater Network hereby requests the following comments to be entered into the public record. These comments concern the commission's Draft Policy Options dated April 2-3, 2003.

- Regarding oily bilge water (p. 24), we recommend prohibition of all oily water discharges in all U.S. territorial waters.
- Regarding "Overall Management Approach" for cruise ship pollution (p.25), we recommend the commission allocate resources to assist ports in developing shoreside water treatment infrastructure.
- Regarding blackwater (p.26), we recommend the commission:
 - Prohibit untreated blackwater discharges in all U.S. territorial waters;
 - Allow treated blackwater discharges only when:
 - Blackwater has been treated to tertiary quality, and
 - Unannounced enforcement inspections are often and regularly conducted.
 - Establish a long-term no-discharge policy for treated and untreated blackwater:
 - Establish shoreside treatment facilities for blackwater to accommodate no-discharge policy.
- Regarding graywater (p.26), we recommend the commission:
 - Prohibit untreated graywater discharges in all U.S. territorial waters;
 - Allow treated graywater discharges only when:
 - graywater has been treated to tertiary quality, and
 - Unannounced enforcement inspections are often and regularly conducted.
 - Establish a long-term no-discharge policy for treated and untreated graywater.
 - Establish shoreside treatment facilities for graywater to accommodate no-discharge policy.

- Regarding hazardous waste (p. 26), we recommend the commission:
 - Prohibit hazardous waste discharges in all U.S. territorial waters; and
 - Mandate that all cruise ships must immediately eliminate all hazardous waste on-board that is not necessary to the normal operations of the vessel, including, but not limited to:
 - Immediate replacement of old polluting dry-cleaning apparatus with new cleaner systems and
 - Immediate replacement of old polluting photo-processing apparatus with digital photo-processing systems.

- Regarding solid waste (p. 27), we recommend prohibition of solid waste discharges in all U.S. territorial waters (must be disposed of on-shore).

- Regarding ballast water (p. 28), we recommend prohibition of discharges of ballast water in estuaries, sensitive waters, and retention zones, and that the commission work towards establishment of an international ballast water management regime that places mandatory controls on discharges of ballast water, with the goal of achieving zero discharge of invasive species worldwide. We also recommend that the commission develop a fair way for the shipping industry to finance treatment of ballast water.

- Regarding Atmospheric Deposition of Pollutants (p. 46), we recommend:
 - Use of ultra-low sulfur diesel fuel (500 ppm sulfur) in all US territorial waters.
 - Requirement that cruise ships connect to shoreside power and shut off engines while in port.
 - Ban on ship-board incineration and dumping of incineration ashes within US territorial waters.

Thank you for this opportunity to comment, and please feel free to contact me if you have any questions.

Sincerely,
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