

## National Environmental Coalition on Invasive Species

Great Lakes United •Healing Our Waters-Great Lakes Coalition •National Audubon Society•National Parks Conservation Association•National Wildlife Federation•Natural Areas Association•Natural Resources Defense Council•The Nature Conservancy

United States Coast Guard  
Docket Management Facility (M-30)  
U.S. Department of Transportation  
West Building, Ground Floor, Room W12-140  
1200 New Jersey Avenue, S.E.  
Washington, D.C. 20590-0001

### Docket Number USGC-2001-10486, Notice of Proposed Rulemaking

December 4, 2009

Dear United States Coast Guard:

The National Environmental Coalition on Invasive Species respectfully submits these comments in response to the Notice of Proposed Rulemaking and Draft Environmental Impact Statement on Standards for Living Organisms in Ships' Ballast Water Discharged in U.S. Waters, Docket No. USCG-2001-10486.

The organizations that make up NECIS represent millions of Americans across the country. NECIS mission is to improve federal policy related to environmental, economic, and health threats posed by invasive species of plants and animals.

### **Introduction**

Invasive species pose a serious threat to the environmental and economic interests of the United States. Today, thousands of these non-native plants, animals, and pathogens have been introduced by humans and are reshaping our country. Ballast water from ocean-going vessels transiting to the United States is a main vector for introductions of new, damaging invasive species.

A strong federal program that effectively eliminates the risk of new introduction and spread of invasive species in the United States is urgently needed, especially in light of the documented high rate of extinction plaguing many aquatic ecosystems.<sup>1</sup> The National Invasive Species Act, 16 U.S.C. §§ 4701 *et seq.* ("NISA"), requires just such a program by establishing a zero discharge standard for the introduction and spread of nonindigenous species. *See* 16 U.S.C. § 4711(c)(1) (the Coast Guard "shall . . . prevent the introduction and spread of nonindigenous species in waters of the United States by ballast water operations and other operations of vessels equipped with ballast water tanks"); 16 U.S.C. § 4711(c)(2) (the Coast Guard "shall . . . ensure to

---

<sup>1</sup> Extinction Rates of North American Freshwater Fauna, Anthony Ricciardi and Joseph B. Rasmussen, *Conservation Biology*, Vol. 13, No. 5 (Oct., 1999), pp. 1220-1222

the maximum extent practicable that aquatic nuisance species are *not* discharged into waters of the United States from vessels”) (emphasis added).<sup>2</sup>

The new rule being proposed by the U.S. Coast Guard helps our nation advance towards meeting a zero discharge standard.

In general, we support the approach the Coast Guard’s proposes to meet the goals of NISA and to establish numerical standards for allowable concentrations of living organisms in ballast water. We strongly support the proposal to establish final (“Phase Two”) standards 1000 times more stringent than the International Maritime Organization’s (IMO) standards. The Phase Two standards represent a high level of environmental protection, they are as stringent as the strongest state standards currently in place, they establish a consistent national program, and they build upon the framework of the IMO’s Ballast Water Convention.

We also support the proposed provisions that allow making the Phase Two standard more stringent when information reveals that a more effective treatment is practicable.

We are pleased with the explicit recognition that vessels subject to this rulemaking are also subject to the Environmental Protection Agency’s Vessel General Permit. We stress the need for active coordination with the EPA as it fulfills its responsibilities under the Clean Water Act (CWA) to regulate ballast water discharges to protect water quality. The Coast Guard and EPA need to work together closely to create a coherent federal program for regulating ballast water that utilizes both the Coast Guard’s expertise in vessels and EPA’s expertise in protecting water quality, in particular in the context of developing control technology. Any federal program to control ballast water discharges from ships must engage both agencies and fully comply both with NISA and the CWA.

We respectfully request the following changes be made to make this rule more environmentally protective, expedite its implementation, ensure accountability, and consistent with NISA mandates.

### **1. Implementation Schedule and Standards**

Since 1990, with the passage of the Nonindigenous Aquatic Nuisance Prevention and Control Act (NANPCA), 16 U.S.C. 4711 et seq., Congress has demonstrated its concern about ballast water management. In 1996, with passage of NISA, Congress reemphasized the role of ballast water in the spread of invasive species. The proposed regulation allows final implementation of Congress’s mandate to occur in 2025--or beyond--35 years after the initial passage of NANPCA. While the final standard proposed is commendable, the national implementation schedule proposed is unnecessarily protracted, especially in the light of how long the Coast Guard has been tasked with “prevent[ing] the introduction and spread of nonindigenous species in waters of the United States by ballast water operations and other operations of vessels equipped with ballast water tanks.”

---

<sup>2</sup> NISA required the Coast Guard to create voluntary national guidelines for ballast water management. 16 U.S.C. § 4711(c). Subsections (e) and (f) of Section 4711 require the Coast Guard to periodically review and revise the guidelines, including by making them into mandatory regulations, if the Coast Guard finds that such revisions are necessary to achieve the zero discharge standard in 16 U.S.C. § 4711(c)(1).

We make the following recommendations to amend the implementation schedule and standards.

a. *Modifications of Phase One Standard.* We urge the Coast Guard to revise the Phase One standards to be the highest standard currently practicable, which is more stringent than standards set by the IMO. We also urge the Coast Guard to revise the implementation schedule to require all vessels to meet the standards by January 1, 2012. We make these recommendations based upon the following factors:

- 1) Current availability of treatment systems that meet the IMO standard. The IMO has determined that at least 3,000 units should be available for installation by 2010.<sup>3</sup>
- 2) A method already exists to improve performance of IMO approved treatments by 10 to 100 times even if treatments to meet standards greater than IMO are not immediately available.<sup>4</sup> This method is the application of ballast water exchange before the use of IMO approved technology.
- 3) The California State Lands Commission determined that treatments are likely available that will meet a standard three orders of magnitude stricter than the IMO standards.<sup>5</sup>

These factors show that compliance with standards at least ten times more stringent than IMO is practicable, and therefore necessary pursuant to NISA's mandate to ensure that aquatic nuisance species are not discharged to the maximum extent practicable. If achieving the Phase Two standard is immediately practicable, we support moving directly to Phase Two.

b. *Modification of Phase Two Implementation Schedule.* We advocate that the Coast Guard require all ships to comply with the Phase Two standards by January 1, 2016. No delay beyond that date is warranted. In January 2009, California reported that two ballast water treatment systems had already demonstrated the potential to comply with the state's standards, which are equivalent to the Phase Two standards.<sup>6</sup> The state also predicted that several systems should be ready to meet the standards before 2010.<sup>7</sup> That prediction appears well on the way to coming true. As California reported less than two months ago:

The field of ballast water treatment technology appears to be evolving rapidly. Within ten months of the release of our most recent report . . . [in January], the number of systems which have presented data demonstrating the potential to meet California's performance standards has more than tripled - from two to seven. We expect to see a great increase in the available data on system performance in the

---

<sup>3</sup> Report of the Ballast Water Working Group, International Maritime Organization. July 15, 2009. MEPC 59/WP.6

<sup>4</sup> Chris Wiley, Department of Fisheries and Oceans/ Transport Canada, and Chair IMO Ballast Water Working Group. October 15, 2009 ppublic presentation

<sup>5</sup> Ballast Water Treatment Technologies for use in California Waters, N. Dobroski, C. Scianni, L. Takata and M. Falkner. California Lands Commission, Marine Invasive Species Program. October 15, 2009.

<sup>6</sup> See N. Dobroski, C. Scianni, D. Gehringer and M. Falkner, California State Lands Commission, *2009 Assessment Of The Efficacy, Availability And Environmental Impacts Of Ballast Water Treatment Systems For Use In California Waters*, at p. 58 (Jan. 2009) ("2009 Assessment"), available at

[http://www.slc.ca.gov/Spec\\_Pub/MFD/Ballast\\_Water/Documents/2009CSLCTechReportFinal.pdf](http://www.slc.ca.gov/Spec_Pub/MFD/Ballast_Water/Documents/2009CSLCTechReportFinal.pdf).

<sup>7</sup> *Id.*

near future, particularly as systems are installed on operational vessels beginning January 1, 2010 for the initial implementation of California's performance standards for vessels with a ballast water capacity of less than 5000 MT.<sup>8</sup>

Clearly, the development of treatment technology is advancing rapidly, making a deadline later than 2016 for compliance with the Phase Two standards unjustified.

*c. Reliance on Drydocking Schedules.* We oppose reliance on drydocking schedules to set the compliance dates for Phase One and Phase Two standards. The proposed rule's allowance for vessels to comply with both the Phase One and Phase Two standards only after their first drydocking after a given compliance deadline is a significant and unjustified delay. As the Coast Guard notes in its fact sheet summarizing the proposed rule, a vessel's "scheduled drydocking..., depending on vessel type and service, could be either a 2.5, 5 or (in very rare cases) 10 year interval."<sup>9</sup> The preamble to the proposed rule states that the Phase One and Phase Two compliance timelines were crafted in part to "avoid[] long delays at shipyards where these installations take place."<sup>10</sup> In other words, the allowance of this additional 2.5 to 10 year period before a vessel would have to comply with the Phase One or Phase Two standards appears to have been based on the assumption that any ballast water management system would have to be installed during the vessel's scheduled drydocking.

Nothing in the administrative record supports this assumption, however. On the contrary, the Coast Guard's own Preliminary Regulatory Analysis and Initial Regulatory Flexibility Analysis states that "[n]one of the proposed systems" for ballast water treatment analyzed by the Coast Guard "requires the vessel to be drydocked."<sup>11</sup> The same document states that "[o]nce the regulatory regime is articulated and actual production and installation have begun, we [*i.e.*, the Coast Guard] consider it relatively easy to install a treatment system."<sup>12</sup>

Additionally, some ballast water treatment technology suppliers have stated that their systems may be installed without drydocking or vessel downtime, can be installed while the vessel is in commercial operation, and require minimal modification.<sup>13 14</sup> Other systems could be developed with this quality in mind.

Because there is no basis in the administrative record for allowing vessels to wait until their next scheduled drydocking before installing a ballast water treatment system that complies with the Phase One or Phase Two standards, this delay should be removed from the proposed timelines at

---

<sup>8</sup> Ballast Water Treatment Technologies for use in California Waters, p. 13, N. Dobroski, C. Scianni, L. Takata and M. Falkner. California Lands Commission, Marine Invasive Species Program. October 15, 2009.

<sup>9</sup> U.S. Coast Guard Office of Operating and Environmental Standards, *Proposed Ballast Water Discharge Standard Rulemaking* (Sept. 15, 2009), Doc. No. USCG-2001-10486-0155.1, at 2 n.1.

<sup>10</sup> 74 Fed. Reg. 44, 639.

<sup>11</sup> U.S. Coast Guard Office of Standards Evaluation and Development, *Preliminary Regulatory Analysis and Initial Regulatory Flexibility Analysis* (June 2008), Doc. No. USCG-2001-10486-0140.1, at 49.

<sup>12</sup> *Id.* at 59.

<sup>13</sup> Hyde GUARDIAN Ballast Water Treatment System, at 2, *available at* [http://www.hydemarine.com/ballast\\_water/e-book\\_tech/Hyde\\_GUARDIAN\\_Tech\\_Brochure.pdf](http://www.hydemarine.com/ballast_water/e-book_tech/Hyde_GUARDIAN_Tech_Brochure.pdf).

<sup>14</sup> Marengo Technology Group, Why Choose Marengo, *available at* <http://www.marencogroup.com/about.html>.

33 C.F.R. §§ 151.1512, 151.2035 (proposed). The Coast Guard should replace this delay with hard deadlines for Phase One and Phase Two compliance, as we recommend above.

d. *Practicability of Phase Two Shall Terminate Phase One Implementation.* Regardless of the ultimate compliance date, no vessel should be allowed to install and implement treatment to the Phase One standards after compliance with the Phase Two standards is practicable. In other words, as soon as compliance with the Phase Two standards is practicable, even if that occurs before our recommended January 1, 2016, compliance date, such compliance must be required of every vessel that has not yet met Phase One requirements.

## **2. Practicability Review**

NISA mandates that the Coast Guard “shall . . . ensure to the maximum extent practicable that aquatic nuisance species are not discharged into waters of the United States from vessels.” 16 U.S.C. 4711(c)(2)(A). We urge the Coast Guard to make several modifications to the proposed rule as it relates to the practicability review to ensure that the practicability review is as efficient and effective as possible and that it conforms to NISA’s mandate.

a. *Immediate and Continuous Review.* We urge the Coast Guard to modify the practicability review process so that it begins immediately and functions as a continuous review process until the successful implementation of the Phase Two standards on all vessels. NISA mandates that *not less frequently than* every three years, the Coast Guard shall review and revise its ballast water regulations and promulgate additional regulations on the basis of the best scientific information available. 16 U.S.C. § 4711(e)(1). Thus, the statute does not require a gap between reviews, but instead assures that reviews will not be spaced too far apart.

In the proposed rule, the Coast Guard sets its initial practicability review as occurring at least three years prior to the first compliance dates set forth in Tables 151.1512(c) and 151.2035(c).

Discrete triennial reviews will cause unnecessary delays in revising the regulations to account for rapidly emerging technologies, especially in the event that a practicable technology becomes available in the interim between reviews. Also, it could result in an initial practicability review occurring so early in the implementation schedule that newly developed, but relevant treatment prospects are not considered.

To address these issues, we urge the Coast Guard to revise the process for the practicability review so that the practicability review process begins immediately, at the time the ballast water management regulations take effect. Further, rather than a discrete event that occurs every three years, the practicability review should be a continuous process, one which enables the Coast Guard to incorporate findings from ballast water treatment evaluations as they submitted to the Coast Guard or identified by the Coast Guard itself. The incorporation of findings that indicate that a treatment system is practicable that surpasses the capacity of prior treatment systems should trigger a new formal practicability assessment. This will allow prompt revisions of the regulations in the event that a technology becomes practicable. This process will better serve NISA’s goal of ensuring that regulations are revised “as necessary, on the basis of the best scientific information available” than the triennial review schedule currently proposed.

b. *Open and Transparent Process.* We also urge the Coast Guard to modify its proposal to ensure that practicability review is an open and transparent process, one that gives all parties, including the public, the opportunity to review and comment. In particular, the regulations should specify that an electronic docket will be established for all information related to the practicability review. Such information should include all data and test results submitted to the Coast Guard in support of an approval of a treatment system, as well as any additional information the Coast Guard gathers or identifies. The rules should specify that all parties may review and comment on the information submitted to the docket.

c. *Ability to Comment on Practicability Determinations.* We urge the Coast Guard to make clear in the rule that the Coast Guard will first issue any determination regarding practicability as an initial determination, and then accept and review public comments before issuing a final determination. This will help ensure that the Coast Guard has received and considered all relevant information in making a practicability determination.

d. *Remove the Presumption of an Extension of Phase Two Compliance Date.* As the Coast Guard recognizes both in the preamble and the proposed rules themselves, 74 Fed. Reg. 44,635; 33 C.F.R. §§ 151.1511(c)(2), 151.2030(c)(2) (proposed), any alteration of the Phase Two standards, or the deadline for compliance with those standards, would be subject to notice-and-comment rulemaking procedures under the Administrative Procedure Act (“APA”), 5 U.S.C. § 553. At the same time, however, the Coast Guard also proposes to include in both Subpart C and Subpart D of the proposed regulations provisions requiring that “the Coast Guard shall . . . extend the initial compliance date” for the Phase Two standards if it “cannot make a determination” that the Phase Two standards will be achievable by the compliance deadline. 33 C.F.R. §§ 151.1511(c)(2), 151.2030(c)(2) (proposed). These provisions would embed within the practicability review a presumption in favor of extending the Phase Two compliance deadlines.

Unless the rules more clearly define the practicability review process and establish a hard deadline for Phase Two compliance, they will not create a sufficiently strong incentive to drive development and implementation of the technology necessary to meet the Phase Two standards. The proposed rule should establish that the Coast Guard will not extend the Phase Two compliance deadline unless it is able to establish through a future APA notice-and-comment rulemaking that such an extension is necessary to allow for practicable implementation of the Phase Two standards.

Pursuant to this comment, we urge the Coast Guard to delete the proposed subsections 33 C.F.R. §§ 151.1511(c)(2) and 151.2030(c)(2). Deleting those two subsections would remove the presumption in favor of extending the Phase II deadlines without otherwise constraining the Coast Guard’s discretion to conduct future rulemakings in connection with any practicability review.

e. *Make the Scope of the Practicability Review Consistent with the Mandate of NISA.* We urge the Coast Guard to revise the regulations to make clear that the practicability review will be consistent with the mandate of NISA. NISA requires that the regulations “ensure to the maximum extent practicable that aquatic nuisance species are not discharged into waters of the United States from vessels.” 16 U.S.C. 4711(c)(2)(A). Courts have held that “the phrase ‘to the

maximum extent practicable’ [ . . . ] ‘imposes a clear duty on the agency to fulfill the statutory command to the extent that it is feasible or possible.’” *Biodiversity Legal Found. v. Babbitt*, 146 F.3d 1249, 1254 (10th Cir. 1998) (quoting *Fund for Animals v. Babbitt*, 903 F. Supp. 96, 107 (D.D.C. 1995)); *see also Wyoming v. United States*, 279 F.3d 1214, 1237 (10th Cir. 2002) (“[T]o the ‘extent’ or ‘maximum extent practicable’ . . . undoubtedly places limits on the agency’s discretion.”).

Accordingly, the practicability review must be limited to the factors identified in NISA. The Coast Guard’s consideration of what technology or practices will reduce vessels’ discharges of invasive species “to the maximum extent practicable” must be in furtherance of NISA’s zero discharge standard for invasive species, 16 U.S.C. § 4711(c)(1) and (2)(A), and consistent with NISA’s express requirement that the Coast Guard’s regulations “be based on the best scientific information available.” 16 U.S.C. § 4711(c)(2)(I). NISA also requires the Coast Guard to “take into consideration” other specified factors, including “(i) vessel types; (ii) variations in the characteristics of point of origin and receiving water bodies; (iii) variations in the ecological conditions of waters and coastal areas of the United States; and (iv) different operating conditions.” 16 U.S.C. § 4711(c)(2)(H). The Coast Guard should focus only on the factors that are expressly authorized by NISA in making a determination of practicability. We urge the Coast Guard to adopt a definition of “to the maximum extent practicable” that will limit the practicability review to these statutorily defined factors.

Extending the practicability review to areas beyond technological feasibility, such as the implementation of testing protocols or the capability of vendors to make or install systems is inconsistent with, and is not supported by, NISA. We therefore urge the Coast Guard to delete the subparagraphs of the proposed regulations that apply the practicability review to testing protocols (33 CFR § 151.1511(c)(2)(ii)<sup>15</sup> and 151.2015(c)(1)(ii)), and revise the preamble so that the practicability review will be consistent with the mandate of NISA.

f. *Coordinate and Consolidate Review with that of EPA.* Given that the CWA also applies to ballast water discharges,<sup>16</sup> it does not make sense for the Coast Guard to create a separate review process for ballast water discharge standards that is any less protective of waters of the United States than the level of protection required by the CWA, or that unnecessarily creates complications and differences between the Coast Guard’s and EPA’s programs. Rather, the Coast Guard should make clear in any final rule that the agency will conduct its NISA practicability review in direct coordination with EPA. Further, the Coast Guard should make clear that it will assist EPA in enforcement of any limitations on ballast water discharge required by the CWA, including any limitations on discharge of ballast water that are more stringent than those that would be required under the Coast Guard’s NISA practicability review.

The CWA requires EPA to ensure that ballast water discharges meet both technology-based effluent limitations based on the best available technology, 33 U.S.C. § 1311(b)(1)(A); 40 C.F.R. § 122.44(a)(1), and water quality based effluent limitations that are sufficient to protect existing

---

<sup>15</sup> We note our recommendation to delete proposed subsection 33 CFR § 151.1511(c)(2) in its entirety in section d.

<sup>16</sup> *Northwest Environmental Advocates v. U.S. EPA*, 537 F.3d 1006, 1025 (9th Cir. 2008) (finding “congressional intent to address the serious national problem of ballast water discharges of invasive species, and to do so on multiple, non-exclusive fronts,” including the CWA).

and designated uses and otherwise not cause or contribute to violations of water quality standards, 33 U.S.C. § 1311(b)(1)(A); 40 C.F.R. § 122.44(d).<sup>17</sup> The water quality-based effluent limitations must be sufficient to protect water quality, without regard to technological feasibility or cost. 33 U.S.C. §§ 1341(a)(1), 1341(d); *see also Defenders of Wildlife v. Browner*, 191 F.3d 1159, 1163 (9th Cir. 1999) (noting that, under CWA, permitting authority “is under specific obligation to require that level of effluent control which is needed to implement existing water quality standards *without regard to the limits of practicability*”) (emphasis added) (internal citations omitted); *In re City of Moscow, Idaho*, 10 E.A.D. 135, NPDES Appeal 00-10, 2001 WL 988721, at \*24 (E.A.B. July 27, 2001) (“[S]ection 301(b)(1)(C) of the CWA requires unequivocal compliance with applicable water quality standards, and does not recognize an exception for cost or technological infeasibility.”).

The only way that EPA can satisfy the CWA’s requirement that waters of the United States be fully protected, without regard to technological feasibility or cost, is to require all vessels to comply with the Phase Two standards in the Coast Guard’s proposed rule according to a hard deadline for compliance, such as the January 1, 2016, deadline that we propose above.

### **3. Whole-Ship Approach**

NISA requires that the Coast Guard address introduction of invasive species from not only ballast water, but also from “ship operations *other than ballast water discharge . . .*”<sup>18</sup> The proposed regulations are not specific enough with regard to non-ballast water management requirements. For example, the provision for removing organisms from hulls, piping, etc. states that the organisms must be removed “on a regular basis.”<sup>19</sup> The only other “whole-ship” provision requires “rinsing” anchors and anchor chains.<sup>20</sup>

We request that the regulations require the Coast Guard to study the impacts of invasive species introduced in ways other than ballast water, such as anchors, anchor chains, and hulls, as well as effective methods to reduce or eliminate the introduction of invasive species through these vectors. We request the regulations provide that, after the study is completed, the Coast Guard amend the regulations accordingly to achieve full protection from invasive species from the whole-ship vector.

### **4. Enforcement**

To ensure that the requirements of both NISA and the CWA are fully and effectively implemented, the Coast Guard should establish a clear and transparent process for sharing monitoring and enforcement information with both EPA and the public. NISA encourages the Coast Guard to use the expertise, facilities, members or personnel of agencies that have routine contact with vessels.<sup>21</sup> Public information on discharges will “democratize” enforcement,

---

<sup>17</sup> The current VGP does not live up to the CWA’s requirements. Because of EPA’s failure to require either kind of limitation in the VGP, the Natural Resources Defense Council and the National Wildlife Federation, along with other environmental groups, are currently challenging the VGP in the U.S. Court of Appeals for the District of Columbia Circuit. The cases have been consolidated under the name *Lake Carriers Ass’n v. EPA*, Case No. 09-1001 (D.C. Cir.).

<sup>18</sup> 16 U.S.C. § 4711(c)(2)(E)(i)(emphasis added).

<sup>19</sup> 33 C.F.R. §§ 151.2050(f)(proposed).

<sup>20</sup> 33 C.F.R. §§ 151.2050(e)(proposed).

<sup>21</sup> 16 U.S.C. § 4711(h)

allowing EPA, States, and private entities and citizens to participate and reducing the Coast Guard's own enforcement burden.

We also urge that a rigorous enforcement, inspection and monitoring program be developed to determine compliance with these new regulations. Such a program would include regular inspection and publication of monitoring reports, as well as include regular, unscheduled inspection of actual performance of technology, including analyzing substantial water samples, to ensure complete compliance. Such a monitoring and inspection program could be incorporated into the Port State Control Program currently implemented by the U.S. Coast Guard.

Finally, it is apparent that implementation of ballast water treatment and technologies will require inspection to ensure water quality of the receiving water body is not impacted by the treated ballast water biocide residuals, treatment byproducts, or other possibly toxic discharges. We request information on how the Coast Guard and the EPA plan to enforce water quality discharge requirements that ensure treated ballast water does not adversely impact the receiving water body.

### **Summary**

A strong federal program preventing the introduction and controlling the spread of aquatic invasive species by commercial vessels is urgently needed. The new rule being proposed by the U.S. Coast Guard helps begin putting one in place. However, we believe improvements must be made to the proposed approach. We urge the Coast Guard to accept our recommendations, which are offered in the spirit of establishing the strongest possible protections for waters of the United States. Please do not hesitate to contact us if you have any questions.

Sincerely,

Jennifer Nalbone  
Director of Navigation and Invasive Species  
Great Lakes United  
Phone: (716) 213-0408; Email: [jen@glu.org](mailto:jen@glu.org)

Peter T. Jenkins,  
Director of International Conservation  
Defenders of Wildlife  
Phone: (202) 772-0293; Email: [pjenkins@defenders.org](mailto:pjenkins@defenders.org)

Jeff Skelding  
Campaign Director  
Healing Our Waters-Great Lakes Coalition  
Phone: (202) 797-6893; Email: [JSkelding@nwf.org](mailto:JSkelding@nwf.org)

Mike Daulton  
Legislative Director  
National Audubon Society  
Phone: (202) 861-2242 ext. 3030; Email: [mdaulton@audubon.org](mailto:mdaulton@audubon.org)

Chad W. Lord  
Director, Water Program  
National Parks Conservation Association  
Phone: (202) 454-3385; Email: [clord@npca.org](mailto:clord@npca.org)

Corry Westbrook  
Legislative Director, National Wildlife Federation  
Phone: (202) 797-6840; Email: [westbrook@nwf.org](mailto:westbrook@nwf.org)

Ruark L. Cleary  
Board of Directors, Natural Areas Association  
Phone: (850) 245.2828; Email: [Ruark.Cleary@myfwc.com](mailto:Ruark.Cleary@myfwc.com)

Gabriela Chavarria, Ph.D.  
Director, Science Center, Natural Resources Defense Council  
Phone: (202) 513-6268; Email: [gchavarria@nrdc.org](mailto:gchavarria@nrdc.org)

Alpa Pandya  
Government Relations, The Nature Conservancy  
Phone: 631-329-3981, ext 15; Email: [apandya@TNC.ORG](mailto:apandya@TNC.ORG)