

## **USPS Position Statement regarding the Ballast Water Issue**

Federal courts have directed the United States Environmental Protection Agency (U.S. EPA) decision to implement across-the-board Clean Water Act (CWA) provisions and National Pollution Discharge Elimination System (NPDES) permitting for all vessels from outboards to cargo ships.

United States Power Squadrons (USPS) opposes a blanket characterization of all vessels and urges the federal government to exercise restraint and reason by exempting small recreational watercraft from NPDES permits not currently required of vessels regulated by the U.S. Coast Guard.

Our organization recommends implementing a national, environmentally-responsible program of manufacture and operation standards for recreational vessels without the need for individual permitting.

USPS further recommends that such a program include development of best management practices for key environmental concerns from recreational watercraft: grey, black and bilge water, as well as engine cooling water and exhaust.

Adopted practices would include such considerations as fuel tank venting and recovery systems, black water holding tanks, and non-discharge of grey water in confined anchorages. In addition, bilges should have oil and water separators ranging from absorbent pads to mechanical devices.

The fragility of our environment is a major concern to all of us, on land and sea. USPS urges a sensible approach in determining environmental regulations that protect our environs but are reasonably imposed based on a vessel's size and use so as to preserve the public's right to enjoy more than 18 million boats for recreational purposes.

Approved by the USPS Operating Committee 13 April 2007

