

COORDINATED UNIFORM LAWS

4. *Stressing Coordination and Uniformity of Boating Laws at Federal and State Levels.*—At the same time the NAEBM was working with ABYC and YSB to establish safety standards and testing, we were also working on the broader problem of developing proper national policies and procedures that would assure some uniformity of enforcement and administration of boating laws among the States. In our opinion, the Federal Boating Act of 1958, which we actively encouraged and supported, accomplished this objective. It set the guidelines for creating the necessary uniformity and reciprocity, and it established the mechanism for effective Federal-State action concerning any problem facing those involved in recreational boating—including the problem of antipollution systems or devices. With the 1958 Federal Boating Act and the standardsmaking work of ABYC two very important parts of a total comprehensive effort to resolve the problem were accomplished. In 1963 the National Association of State Boating Law Administrators, NASBLA, organized a committee charged with the responsibility of compiling a report on the nature and extent of pollution of the waters of the United States by recreational watercraft and to make recommendations relative thereto. The committee of administrators, in the course of their duties, sent a questionnaire to over 200 heads of health, engineering, sanitation, and boating enforcement agencies to determine from the experts an estimate of the effect pleasure boats had on pollution, an idea of the number of boats actually involved, and an estimate of the number of days they were used. In November of 1965 the committee presented an official report of their findings to the membership of NASBLA. This excellent report indicated that pollution from recreational boats was, at most, negligible. We believe that this statement still holds true today.

NASBLA did not just stop there. In an effort to encourage uniformity among the widely varying State laws, they prepared a "Model Law" for the regulation of disposal of sewage from watercraft and to prohibit littering of waterways. This model serves as a uniformity guide and includes broad specifications for all types of devices.

As an example of a coordinated effort, one State, New York, a leader in the NASBLA Organization as well as in the development of laws regulating vessel discharges, is now completing an extensive study under the direction of the Yacht Safety Bureau. In our opinion, New York could possibly have a most workable, economical, and acceptable law, which could be adopted by other States in the country thus meeting required criteria of the Federal or State agencies involved in the problem. An interesting point is that the New York State law, modeled after NASBLA suggested law, uses the American Boat & Yacht Council project A-8 standard on sewage treatment devices which was adopted in July 1964; and will probably recognize testing procedures currently being developed by the Yacht Safety Bureau.

Both of these organizations submitted testimony before the Senate Committee on Public Works, Subcommittee on Air and Water Pollution. I would like to submit for the record copies of the statements which were presented before the committee.