

THE CRUISING CLUB OF AMERICA

August 1, 2002

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Dr. Thomas R. Kitsos, Executive Director
United States Commission on Ocean Policy
1120 Twentieth St., NW
200 North
Washington, DC 20036

Subject: Recommendations for a Unified Yacht Sewage Treatment Initiative

Re: Letter from E. C. Brainard II to Dr. T. Kitsos dated July 11, 2002

Dear Dr. Kitsos;

As the Commodore of the Cruising Club of America, I am forwarding to you a letter prepared by our Environment of the Sea Committee. Within this letter you will find a discussion of the current situation related to yacht discharges in this country, and some recommendations for the Ocean Commission to review.

The Cruising Club of America was started during the winter of 1921-22 by an enthusiastic group of cruising sailors. Today our membership numbers approximately 1150 men and women. These sailors cruise worldwide and are very experienced. There is a great concern within the membership to keep our harbors at high standard pertaining human wastes and other pollutants. We hope you can give careful consideration to the recommendations of our Environment of the Sea Committee so that we can find a practical way to preserve one of country's most valued assets, our many and varied cruising coastlines.

Thank you.


William E. Whitney

July 11, 2002

Dr. Thomas R. Kitsos, Executive Director
United States Commission on Ocean Policy
1120 Twentieth St., NW
200 North
Washington, DC 20036

Subject: Recommendations for a Unified Yacht Sewage Treatment Initiative

Re: Call for recommendations by the U. S. Commission on Ocean Policy

Dear Dr. Kitsos;

I have made contact with your Commission member, Dr. Robert Ballard, and he suggested that I submit to you our suggestions for a Unified Yacht Sewage Treatment Program.

Our Committee has followed the effects of legislation enacted in 1968 and since modified to establish yacht sewage treatment systems commonly referred to as Marine Sanitation Devices (MSD). Marine Sanitation Devices provide various levels of treatment such as simple maceration and chlorination of the sewage (MSD I), to high removal of suspended solids and disinfection (MSD II), to finally no discharge with the sewage held in a holding tank, (MSD III), which requires near daily pump-out. All yachts, which have been built since the law was enacted, have had (MSD III) systems installed.

We are not sure exactly how the sewage standards were established for the MSD I and II systems. They seem to be the result of interplay between the EPA and spokesmen from the public and industry at the time hearings were held in the United States. There does not seem to be a logical rationale tying the standards to other standards, such as municipal discharge standards.

The recent trend has been that specific areas in this Country have applied through the EPA to be designated as "No Discharge" zones. The requests for this status has been justified stating that the areas were critical environmental areas, which needed protection. Such areas that have come under this designation are Narragansett Bay, RI and Buzzards Bay, MA.

exceed \$5.00. A typical yacht needs to be pumped-out every few days. It takes approximately 20 minutes to tie up at an easily accessible dock, pump-out, and then leave the dock. Dock space is an important commodity at shore front facilities, and the owners of the facilities have tended to place the pump-out facilities in less accessible areas of their docks, which increases pump-out time and difficulty for the yachtsman. For the above reason, yachtsmen are not using their MSD III systems and are continuing to discharge untreated sewage into harbors and bays.

The United States has an immense diversity of lakes, rivers, estuaries and bays, along with many harbors and anchorages. It would not be possible to make a sweeping statement of what level of treatment is required by a yacht to keep from harming the environment. However, one must put the impact of yachts into perspective to understand their impact on the environment. Yachts account for only 0.1% of the sewage discharged into our coastal area. The balance comes from municipalities, residences, and farm runoff.

We have two suggestions that we recommend be implemented by the United States government to minimize the impact of yacht sewage on the environment and help protect our recreational resources:

1. Yachts should be treated just as municipalities are treated. They should be allowed to discharge treated sewage to standards in line with the municipalities. This does not mean that they could discharge in very environmentally critical areas, such as poorly flushing small harbors, but they should be allowed to discharge in bays, rivers and coastal areas where municipalities are discharging.

There is one major difference between the discharge of a municipality and a yacht. A yacht uses less than one twelfth of the water that a typical home uses. A yacht uses about 6-10 gallons a day per person for sewage handling, whereas a domestic use averages 80-120 gallons a day per person. The municipality discharge is often also more diluted due to infiltration in the system of ground water or the inclusion of storm run-off into the system. Thus, we recommend that the standards for yachts be set using typical municipality standards and adjusting them for dilution. However, we recommend that the standard for treatment for pathogens including bacteria and viruses be set to zero to ensure a high quality for public health reasons.

2. We recommend that a national program be initiated to stimulate industry to develop suitable MSD systems to meet the newly proposed standards. Through the EPA, and Coast Guard, who have the

government incentives to stimulate industry to come in and meet the challenge of solving this problem. These incentives could be income tax research and development credits, or more preferably, outright grants to industrial firms, which are qualified and submit suitable proposals to meet the challenge.

Our Committee has made contact with many yacht owners and read reports about the response of boaters to current discharge laws. We find that the present situation of demanding "No-Discharge" in entire bays is untenable. Many in the boating community are not obeying the law and due to necessity and practically, are discharging untreated sewage overboard. We feel that to place generally law-abiding citizens into a situation where they cannot follow the law is an erosion of the moral and ethical standards of our county. Action must be taken to bring the laws into focus, make suitable adjustments so they are practical, and ensure that we protect one of our nations most valuable assets, our magnificent coastal water and yachting areas.

I appreciate that this letter is brief, but I hope that I have transferred to your Commission the basic concept of bringing yachts under the same standard as municipalities relative to sewage discharges, which will greatly improve water quality.

Thank you for considering our recommendations. We would be pleased to provide more detailed inputs upon request.

Respectfully Submitted,

E. C. Brainard

Chairman
The Environment of the Sea Committee
Cruising Club of America