

**Comments of the Boat Owners Association of The United States
Regarding Voluntary Guidelines to Prevent the Spread of
Aquatic Nuisance Species: Recreational Activities
FWS-HQ-R-2013-N025**

July 31, 2013

BoatU.S. is the largest organization of recreational boaters in the United States, with more than 500,000 members nationwide. Our members enjoy this family friendly activity on all types of water around the country, using a wide range of sizes and styles of boats. We have been an active participant in both the development of these guidelines as well as numerous other education programs to address the spread of aquatic nuisance species.

In terms of the affected community for these guidelines, it's important to note that the vast majority of recreational boats in this country are small (under 16-feet). There are an estimated 12.4 million registered boats in the U.S. as well as millions of human powered craft like canoes and kayaks. Seventy-four percent of the nation's boating households have an income of less than \$100,000.

For a number of years the recreational boating community has embraced voluntary practices and programs to prevent the spread of ANS. BoatU.S. has been actively involved with the Recreational Guidelines Committee of the Aquatic Nuisance Species Task Force since its inception in 1998. As a key stakeholder in this effort, we have continually sought to find effective, achievable practices to stop the spread of ANS while keeping boating accessible to all.

While these guidelines do not establish regulation, it is likely they will be used by state and local ANS prevention officials as the starting point for mandatory programs that could substantially affect recreational boating practices. With that in mind, we believe there are several sections that require further refinement before the guidelines are finalized.

Our specific observations and concerns include:

1. **Conflicting guidance on the use of hot water for the flushing of motors and interior components** – For example, in the general guidance on page 2 for equipment in the water less than a day, it states “Flush motor according to the owner’s manual.” Yet on page 3, for equipment left in the water for more than a day, it says to “Rinse/flush motor and interior components with hot water.” It concerns us to see reference to following the owner’s manual in one instance but not in the other. The guidelines should be consistent in support for following manufacturers’ recommendations.

2. **Potential damage from the use of hot water on untested components** – We are concerned with the possibility for damage to engines and components from hot water unless they have been specifically shown to be able to withstand such treatment. Without specific testing of a component’s ability to withstand water of up to 140° Fahrenheit, boat owners could cause thousands of dollars of damage by following some of these guidelines. In addition, state and local ANS programs that follow this guidance could open themselves up to potential liabilities from such damage. We urge that any recommendation for the use of hot water be consistent with manufacturers’ guidance, and only once it is clear the parts can withstand such treatment.
3. **Impractical guidance regarding the use of hot and high pressure water** – We question the strong emphasis on rinsing boats and equipment particularly with hot and high pressure water, before leaving the water access area. This prominence is nicely summed up in the introduction: “Bottom line: Hot water Kills ANS, while rinsing flushing or high pressure water removes them.” This fails to recognize, however, that hot, high pressure water is rarely available at many boat ramps. The guidelines should note that in its absence, a good cleaning with fresh water and thorough drying will go a long way at preventing the spread of ANS.
4. **Confusing guidance on where boaters should spray/rinse/drain equipment** – The guidance provided regarding where a boater should spray, rinse or drain their boats and equipment is confusing. For example, on page 3 it says “Spray/Rinse recreational equipment either at home or at a car wash unless state, tribal or local regulations prohibit leaving the site without washing.” Additionally, on page 4, in the section directed at anglers, it says “Drain water from boat, motor, bilge, bladder tanks, live-well and portable bait containers away from ramp.” However, on page 6 it says “Drain water from boat, motor, bilge bladder tanks, live-well, and portable bait containers *before* leaving water access.” The guidelines should be revised to clarify that boaters should remove aquatic vegetation and drain the boat’s bilge before leaving the water access site but possibly not right at the ramp. This would help avoid ramp delays and minimize the impact of any contaminants such as oil and cleaning agents from entering the waterway.

BoatU.S. has a strong, long-term commitment to preventing the spread of ANS. Recognizing these guidelines have been developed with the input of a number of interested parties with some divergent views, we urge caution in their implementation. It would be highly detrimental to recreational boating if ANS prevention programs that stem from this guidance create a significant burden on the boating public. As one of the stakeholder groups who experience the direct affects of invasive species, recreational boaters have an abiding interest in supporting these guidelines. ANS prevention strategies, however, should never become so onerous that they effectively prevent recreational boating in particular waters.

We appreciate the opportunity to provide our views on these guidelines and stand ready to assist in further efforts to prevent the spread of ANS.