



Personal Watercraft  
Industry Association

October 2, 2013

Personal Watercraft Industry Association  
444 North Capitol Street, N.W.  
Suite 645  
Washington, DC 20001  
(202) 737-9761

**VIA CERTIFIED U.S. MAIL**

Superintendent  
Gateway National Recreation Area  
210 New York Avenue  
Staten Island, NY 10305

RE: Draft Alternatives for Gateway National Recreation Area General Management Plan

Dear Superintendent Nersesian:

The Personal Watercraft Industry Association and its member companies Bombardier Recreational Products Inc. (BRP), Kawasaki Motor Motors Corp., and Yamaha (collectively, "PWIA") appreciate the opportunity to submit these comments in response to the National Park Service's ("NPS") July 2013 issuance of the Draft General Management Plan/Environmental Impact Statement ("GMP" or "EIS") for Gateway National Recreation Area ("GATE"). The PWIA's members are manufacturers and/or distributors of personal watercraft ("PWC"), and have unparalleled experience and institutional knowledge with respect to PWC.

The PWIA was founded in 1987 by the manufacturers of personal watercraft and is an advocate for safe and responsible PWC operation. The PWIA supports reasonable and fair regulations, strong enforcement of boating and navigation laws, and mandatory boating safety and education for all PWC operators. The PWIA is an affiliate organization of the National Marine Manufacturers Association ("NMMA"), the leading trade association representing the recreational boating industry in North America.

There are 1.3 million registered PWC in the United States today, yet only a tiny fraction of that number registered near and operated in the areas encompassing GATE (New York and New Jersey).<sup>1</sup> The economic downturn in the U.S. economy has had a significant impact on the boating industry, with production and sales volume for PWC decreasing in the past several years. Recent economic trends have altered the nature and trajectory of the PWC market since the National Park Service's notice to prohibit the use of PWC within 21 parks, including GATE.<sup>2</sup> The overwhelming majority of PWC sold today are three-passenger models, and have undergone significant advancements to the design and improved technology. The modern design and

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<sup>1</sup> National Marine Manufacturers Association, "Recreational Boating Statistical Abstract." 2012.

<sup>2</sup> Department of the Interior, National Park Service, "Personal Watercraft Use within the NPS System," Final Rule, Federal Register, Vol. 65, No. 55, March 21, 2000, pp. 15077-15090 [hereafter, "Final Rule"].

environmental improvements have reduced PWC noise by 70 percent in the past decade, and all PWIA member manufacturers meet or exceed National Park Service noise level requirements. Furthermore, PWCs have reduced emission levels by 90 percent since 1996.<sup>3</sup>

PWIA supports the efforts of the National Park Service (NPS) to preserve our parks, including the GATE, for future generations. In addition, PWIA appreciates the thoughtful process you are using as you consider making changes to GATE's Management Plan. However, PWIA's members want to be sure that recreational boating activities are given due consideration by the NPS and are not unreasonably restricted nor given prejudicial treatment.

PWIA encourages NPS to evaluate and consider improving boat ramp facilities within GATE. NPS should review other existing public boat ramps in the immediate New York City and New Jersey areas adjacent to GATE. Not only are there the existing boat ramp facilities in the Great Kills area, there is also significant waterfront space at the Floyd Bennett site that has potential to become a national model of a modern and highly accessible recreational boat ramp facility in a major U.S. city.

GATE offers the opportunity for NPS to foster partnerships with state boating access officials and local, state and national marine associations in creating a landmark recreational boating environment. To that end, PWIA encourages NPS to consider the economic impact and environmental enhancements from PWCs and work with both the industry and boating community to determine a workable solution that promotes stewardship and does not unjustly target certain user groups.

The draft Alternative Management Plan presents an opportunity for a thorough investigation of the following questions and issues:

- What was the original purpose and justification of excluding PWC from GATE?
- Are those purposes and justifications valid when applied to the current state of technology of PWC, the increasing demographic age of users, the significantly reduced emissions and sound and safety improvements that have been achieved in the past 10 years?
- What is the economic impact of prohibiting PWC from GATE?
- What is the current expense of enforcing the prohibition within the current boundaries of GATE?
- Will the budgetary impact of upholding the prohibition put additional strain on the federal, state and local law enforcement budget?
- What is the threshold for regulation of PWC? At what level of sound, emissions, speed limits and other factors must be achieved in order to negate whatever reasons exist for the creation of the original prohibition of PWC from the National Recreational Area?
- What is the rationale for allowing human-propelled vessels and motorized vessels *with the exception of PWC* within the waters of GATE?
- How will NPS justify the loss in economic revenues from PWC related tourism?

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<sup>3</sup> 2011 National Marine Manufacturers Association Statistical Abstract; 40 C.F.R. 1045; SAE-J1970; ISO-14509.

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Thank you again for considering these comments. PWIA offers its expertise, studies and data to NPS and the Gateway National Recreational Area to assist it in collecting and determining the answers to the questions posed in these comments.

Please contact David Dickerson, PWIA Executive Director, at 444 North Capitol Street N.W., Suite 645, Washington, D.C. 20001, (202) 737-9761 or [ddickerson@nmma.org](mailto:ddickerson@nmma.org), at any time.

Sincerely,

A handwritten signature in cursive script that reads "David Dickerson". The signature is written in dark ink and is positioned below the word "Sincerely,".

David Dickerson  
PWIA Executive Director