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UNITED STATES COAST GUARD
Commercial Fishing Vessel Safety Advisory Committee
Seattle, WA

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Dear Committee:

Please accept this as my public comment in reference to the Load line requirements as it pertains to Crabber/Tenders, the current Load Line exemptions, and proposed future Load Lines.

I am the owner of the "LADY ALASKA" (972591) and "LADY KODIAK" (972646) constructed in 1991 and 1992 for the specific purpose of Fishing Crab, with tendering as a secondary use. They had been operating continually as crabber/tenders without any changes to configuration since their construction and believed exempt from the Load Line requirement. Due to an unintended side result of the Individual Fishing Quota (IFQ) Crab program enacted by the US Federal government for "safety at sea" reasons; the "LADY ALASKA" and "LADY KODIAK" are on standby status, and have not had to go crabbing.

Recently the question arose as to whether "LADY ALASKA" and "LADY KODIAK" are defined as fishing vessels per their "fishing days at sea". Our answer is that they were designed by Naval Architects as crabber/tenders with crabber stability reports, and continue to be fishing vessels whether they are crabbing/fishing or on standby to fish. The "fishing days at sea" should only apply in instances where other vessels that weren't designed and built as fishing vessels, are used as fishing vessels.

While the intent behind the Load Line requirement is to insure vessel safety, the "LADY ALASKA", and "LADY KODIAK" have stringent stability tests demonstrating the load conditions of flooded water/crab in the tanks, with a full deck load of crab pots, and suited to operate in the harshest of winter conditions in the Bering Sea. The question I ask is whether load line requirements for tendering in the summer months in inshore waters with no load on deck, make my vessels any safer?

The history of the “LADY ALASKA” and “LADY KODIAK” is having operated for 20 years of crabbing in the Bering Sea without a single mishap or incident as proof of our track record. At this time to not recognize my vessels as exempt from load lines for summer tendering in inshore waters does not make sense, and would be a hardship to us. These are of the largest vessels working for Ocean Beauty Seafoods and are the backbone of their tender fleet. Without us, Ocean Beauty may not be able to get a portion of the fish into their processing plants. Many Salmon vessels could be unable to deliver their catches and hundreds of the Seafood processing employees could be impacted.

In closing, we ask that “LADY ALASKA” and “LADY KODIAK” continue to be recognized as fishing vessels exempt from Load Lines. We also recommend that the crabber stability reports that support more stringent winter operating conditions in the Bering Sea than those of summer tendering in inshore waters, be accepted in lieu of pending load line requirements in 2020.

Respectfully Submitted,
Kevin Suydam