



# UNITED FISHERMEN OF ALASKA

**Mailing Address:** PO Box 20229, Juneau AK 99802-0229

**Physical Address:** 410 Calhoun Ave Ste 101, Juneau AK 99801

**Phone:** (907) 586-2820 **Fax:** (907) 463-2545

**Email:** [ufa@ufafish.org](mailto:ufa@ufafish.org) **Website:** [www.ufafish.org](http://www.ufafish.org)

October 23, 2019

Federal eRulemaking Portal

**Subj:** Public Comments on Agenda for Commercial Fishing Vessel Safety Advisory Committee (CFVSAC) Teleconference (October 30, 2019), Department of Homeland Security Docket # (USCG – 2019 – 0751)

Dear Mr. Myers,

Thank you for the opportunity for United Fishermen of Alaska (UFA) to comment on the agenda for the subject teleconference. UFA represents 34 member associations participating in fisheries throughout Alaska and the federal waters off Alaska's coast. Alaska's seafood industry employs over 60,000 people annually, collectively harvests 60% of all wild capture fisheries in the United States and is worth an estimated \$2B in ex-vessel value. As major stakeholders and participants in these sustainably harvested state and federal fisheries, UFA is of the firm belief that fishing vessel safety legislation, regulation and policy must make sense for Alaskan fishermen and that U.S. Coast Guard policy makers should strongly consider our collective voice.

We applaud the U.S. Coast Guard's efforts to engage with the fishing industry through the CFVSAC and appreciate this opportunity to provide comments on the agenda. First, we would request an update as to the status of recommendations made by the fishing industry to repeal, replace, or modify existing regulations, guidance, and collection of information under Docket # (USCG – 2017 – 0480). We have attached a copy of the comment letter submitted directly by UFA on July 24, 2017 as well as the comment letter dated September 11, 2017 to which UFA was signatory. We believe that collectively these letters contain important fishing industry "asks" which would maintain a robust safety regime while simultaneously removing outdated or ineffective regulations.

Second, we would request a progress report on the status of new appointments and renewal appointments to the CFVSAC. I am sure you are as frustrated as we are over the slow pace of these appointments but remain hopeful that progress is being made in getting qualified people to serve on this important advisory committee.

Lastly, we wish to express our concerns over the Task 01-19 titled – "Develop a voluntary best practice guide to be used by the Commercial Fishing Industry during fishing vessel construction, maintenance, and repair." UFA's membership consists of a vast array of fishing industry associations representing the full spectrum of Alaskan fishermen – from those who fish on set net skiffs in the internal waters of Alaska to those who fish on large catcher-processors in the farthest reaches of the Exclusive Economic Zone off Alaska. In considering the wide diversity within our own membership, UFA members are concerned that Task 01-19

is overly broad in scope, is not achievable in the timeline proposed, and is arguably not necessary.

- **Construction:** Construction of fishing vessels built for Alaska fisheries continues to occur within a number of shipyards in Alaska and the Pacific Northwest – and to our knowledge we have not heard that those vessels have been constructed in an unsound manner. In our view existing statutes, classification society standards, and other accepted standards such as American Boat and Yacht Council or standards established by accredited marine surveyors are sufficiently clear to inform fishermen, naval architects, and shipyard representatives who may be considering building a fishing industry vessel. In those rarer circumstances where a relatively unique vessel is being considered, the existing network of naval architects, class surveyors, marine surveyors and shipyards within each region of the country is the preferred source of information for guidance on new construction. If there are concerns with the clarity of standards, it would be important to discuss them at this meeting.

- **Maintenance and Repair:** Similar to the discussion regarding construction, we would point to a number of existing U.S. Coast Guard policy documents which detail the maintenance and repairs of various systems for commercial fishing industry vessels. Most recently in 2017, the U.S. Coast Guard through the CFVSAC published the “Voluntary Safety Initiative and Good Marine Practices for Commercial Fishing Industry Vessels.” We feel that the sections within this document on Machinery and Electrical Safety, Material Condition, Flooding Prevention, and Period Testing of Equipment and Systems provide sufficient voluntary guidance for the maintenance and repair of existing commercial fishing industry vessels. In addition, the U.S. Coast Guard has a number of NVICs for the maintenance and repairs of various vessel hull materials including wood, fiberglass (FRP), and aluminum. Collectively these guidelines are sufficient to inform fishermen, naval architects, surveyors, and shipyards of existing guidance on the maintenance and repair of fishing vessels.

Given the highly regional nature of commercial fishing and the diversity of vessel types and sizes which may occur within a given region, it is our view that a “voluntary standards document” for the construction, maintenance, and repair which addresses the full diversity of the commercial fishing industry vessels is a complex, time consuming and largely impossible task. Instead, UFA would recommend that the U.S. Coast Guard greatly narrow the scope of this task and alternately task the CFVSAC in developing safety initiatives which incorporate elements that have proven to be worthwhile and effective in improving safety in Alaskan fisheries.

**Follow the Data / Address the Risk:** Focus on developing best practices in those limited fisheries where catastrophic vessel loss and or disproportionate fatalities continue to occur. Small vessel / skiff capsizing's and man overboard events remain key drivers for fatalities in Alaskan fisheries and development of practices to address those concerns should be a priority.

Promote the Dockside Exam: The most important venue which promotes safety is the industry / U.S. Coast Guard interaction that occurs during a dockside exam. The best solutions are those which increase participation with the dockside exam and those solutions that can be verified during a routine dockside exam.

Thank you for your consideration and the opportunity to comment.

Sincerely,



Matt Alward  
President



Frances H. Leach  
Executive Director

Encl: (1) UFA Comment Letter on USCG-2017-0480 dated 24 Jul 2017  
(2) Industry / UFA Letter on USCG-2017-0480 dated 11 Sep 2017

#### MEMBER ORGANIZATIONS

Alaska Bering Sea Crabbers • Alaska Longline Fishermen's Association • Alaska Scallop Association  
Alaska Trollers Association • Alaska Whitefish Trawlers Association • Armstrong Keta • At-sea Processors Association • Bristol Bay Fishermen's Association  
Bristol Bay Reserve • Cape Barnabas, Inc. • Concerned Area "M" Fishermen • Cook Inlet Aquaculture Association • Cordova District Fishermen United  
Douglas Island Pink and Chum • Fishing Vessel Owners Association • Freezer Longline Coalition • Golden King Crab Coalition • Groundfish Forum • Kenai  
Peninsula Fishermen's Association • Kodiak Crab Alliance Cooperative • Kodiak Regional Aquaculture Association • Kodiak Seiners Association • North Pacific  
Fisheries Association • Northern Southeast Regional Aquaculture Association • Petersburg Vessel Owners Association • Prince William Sound Aquaculture  
Corporation • Purse Seine Vessel Owner Association • Seafood Producers Cooperative • Southeast Alaska Herring Conservation Alliance  
Southeast Alaska Fisherman's Alliance • Southeast Alaska Regional Dive Fisheries Association • Southeast Alaska Seiners  
Southern Southeast Regional Aquaculture Association • United Cook Inlet Drift Association • United Southeast Alaska Gillnetters  
Valdez Fisheries Development Association