



16711

AUG 30 2012

Commercial Vessel Operators
Operating in Puget Sound, WA

Subj: IMMERSION/EXPOSURE SUIT EXEMPTION FOR COMMERCIAL FISHING
VESSELS OPERATING IN PUGET SOUND

46 Code of Federal Regulations (CFR) 28.110 requires vessels operating in Coastal Waters of Puget Sound to carry an immersion suit or exposure suit for each person on board. The authority for granting exemptions for the requirements of the commercial fishing industry vessel safety regulations is contained in 46 CFR 28.60. The provision recognizes that there may be cases where exemptions are warranted, and establishes qualifying criteria for such exemptions. Specifically, an exemption may be granted when good cause exists, and the safety of the vessel and crew onboard are not adversely affected. As such, commercial fishing industry vessels, 36 feet and less and operating in the internal waters of Puget Sound are granted an exemption of this requirement to carry an immersion suit or exposure suit for each person on board as outlined below.

Accordingly, the exemption is granted, subject to the following restrictions:

- a) The vessel must carry a Coast Guard approved type I or II PFD, for all persons on board or each person on board must be wearing a type III or type V PFD.
- b) The exemption is valid only on waters inside the Puget Sound east of line drawn from Angeles Point north to the US/Canadian Boarder
- c) This exemption is limited to vessels less than 36 feet, operating with no more than 5 persons on board.
- d) To ensure a minimum safety standard, as a condition of this exemption, your vessel must undergo an ANNUAL dockside examination, meet all other federal requirements and receive a Commercial Fishing Vessel Safety Decal.
- e) A copy of this letter must be carried on board the vessel, be readily available for inspection and is only valid as long as the vessel has a valid Commercial Fishing Vessel Safety Decal.

If you have any questions regarding this matter, please feel free to contact the Thirteenth District Fishing Vessel Safety Coordinator, Dan Hardin at (206) 220-7226.

Sincerely,

A handwritten signature in blue ink, appearing to read "KAT" followed by a long horizontal stroke.

K. A. TAYLOR

U.S. Department of
Homeland Security

United States
Coast Guard



Commander
United States Coast Guard
Thirteenth Coast Guard District

915 Second Ave
Seattle, WA 98174-1067
Staff Symbol: (dp)
Phone: 206-220-7210
FAX: 206-220-7225

16711 /

AUG 31 2012

A handwritten signature in blue ink that reads "Michael S. Gardiner".

From: Michael S. Gardiner
Chief Prevention, Thirteenth District

To: Sector Puget Sound, Prevention

Subj: IMMERSION / EXPOSURE SUIT EXEMPTION FOR COMMERCIAL FISHING
VESSELS OPERATING IN THE PUGET SOUND.

Ref: (a) Sector Puget Sound Memo of 03 May 2012

1. In response to reference (a) the District Commander has approved the exemption for survival suit exemption, fishing vessels in Puget Sound.
2. You can begin distributing the letter to those vessels meeting the criteria as outlined in the enclosure.
3. If you have any questions regarding this matter, please feel free to contact the Thirteenth District Fishing Vessel Safety Coordinator, Dan Hardin at (206) 220-7226.

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Immersion suit exemption letter dated August 30, 2012



16711/PUGET SOUND
FISHING VESSELS
03 May 2012

From: 
J. D. Dwyer
Chief, Inspection Division
CG Sector Puget Sound

Reply to Mr. Martin Teachout
Attn of: (206) 217-6187

To: CGD 13(dpi)

Subj: SURVIVAL SUIT EXEMPTION, FISHING VESSELS IN PUGET SOUND

Ref: (a) 46 CFR 28.60 (a) (2)

1. Present regulations require that fishing vessels operating in the coastal waters of Puget Sound carry immersion suits for every person on board. However, fishing vessels operating in the Puget Sound that are in "waters other than coastal" need only have type I, II, III, or V PFDs for every person on board. Sector Puget Sound requests approval to exempt all fishing vessels that operate exclusively in Puget Sound from the immersion suits requirement for the Puget Sound area from a line drawn due north from Dungeness Point to intersect the Canadian border and all waters south, southeast of this line.

2. The following justification applies:

- a. Puget Sound is considered partially protected waters.
- b. A vast majority of boats fishing in the Puget Sound are 32 feet or less, with many of these boats less than 26 feet. Space for the storage of immersion suits on these small boats is typically very limited.
- c. The vessels involved in the Puget Sound fisheries routinely fish with other such fishing boats in the near vicinity.
- d. If a small boat were to have a problem, it is unlikely the persons on board would have time to don an immersion suit prior to the vessel sinking.
- e. Since the Fishing Vessel Safety regulations were promulgated over 20 years ago, there has never been a fishing vessel casualty in Puget Sound where any one was saved by wearing an immersion suit.

3. I recommend that this request be granted with the following conditions:

- a. Vessels must carry a Coast Guard type I, II PFD for all persons on board or a wearable type V inflatable or other type V PFD.
- b. Operations are limited to vessels operating with no more than 5 persons on board.
- c. All vessels must have an annual Safety Decal.
- d. A copy of this exemption letter must be carried on board the vessel at all times.