



16711/006-11
April 8, 2011

Mr. Vern Goehring
California Sea Urchin Commission
1621B 13th Street
Sacramento, CA 95814

Dear Mr. Goehring:

We have reviewed your request to recognize a name change to the **California Sea Urchin Commission** in regards to the immersion suit exemption approved by Commandant, U.S. Coast Guard, dated August 29, 1994.

The request is approved as provided below. All exemption specifics remain unchanged, and for clarity purposes, are reiterated below. Please keep the attached enclosures on file with your records for this document.

Additionally, please ensure all association members are advised that in order for this exemption to be valid, the vessel claiming the exemption must have a current Commercial Fishing Vessel Safety (CFVS) decal **and** a copy of this exemption letter onboard.

“2. ...Specifically, to grant an exemption, good cause must exist and the safety of the vessel and those on board must not be adversely affected. After considerable review and consideration, we found both conditions are satisfied. Accordingly, this exemption specifically applies to commercial fishing industry vessels meeting the following criteria:

- a. Vessels in the abalone and urchin diving industry operating within three miles of shore, transiting up to twenty miles from the coast or in the Channel Islands area south of Point Conception, or making a direct transit from San Diego to San Clemente Island, are exempt from the immersion suit requirements in 46 CFR Section 28.110 provided that a wet suit and a Type I PFD is available to each person on board and is readily accessible.*
- b. In addition, to ensure a minimum safety standard, as a condition of gaining an exemption, each vessel must annually undergo a dockside examination and meet all other federal requirements.*

To ensure consistent enforcement of this exemption, this letter should be given wide distribution to Coast Guard units and industry within the affected area. It is recommended that a copy of this letter be maintained on board or be readily accessible for each vessel exercising this exemption. This exemption is subject to change should future casualty data suggest immersion suit carriage.”

Sincerely,

K. R. Ross
Chief, Inspections and Investigations
U.S. Coast Guard
By direction

Enclosures:

- (1) California Sea Urchin Commission letter dated 19 July 2010.
- (2) COMDT (G-MVS) letter 16711.10 dated 29 August 1994.