**WESTERN STATES BOATING ADMINISTRATORS ASSOCIATION INC**

Reply to: Aaron Kerr, President

 3030 Energy Lane

 Casper, WY 82604

May 26, 2020

Verne Gifford

Chief, Boating Safety Division

CG-BSX-2

U.S. Coast Guard Headquarters

2703 Martin Luther King, JR Ave SE
Stop 7501
Washington, DC 20593-7501

Dear Mr. Gifford:

On behalf of the Western States Boating Administrators Association, I would like to thank you for the opportunity to provide comment on the draft State Recreational Boating Safety Program Guide, Commandant Publication 16755.3B. WSBAA’s 18 member states and territories are working diligently to provide their citizens with excellent boating safety law enforcement and education programs. Our partnership with the United States Coast Guard and the funding provided by the RBS grant enhances state programs and provides critical resources that benefit the public.

The State RBS Program Guide is an important document outlining the structure of that partnership and the responsibilities of member states for maintaining adequate boating safety programs. Speaking from experience, it takes some time for a new boating law administrator to learn how the RBS grant works and gain an understanding of their state program responsibilities. BLAs and other state RBS personnel will greatly benefit from a clear, concise RBS grant reference document. The draft State RBS Program Guide presented to the states for review at the February 2020 BLA workshop in Lexington, KY goes a long way toward addressing the needs of state personnel and improving overall understanding of the RBS grant program.

Several WSBAA member BLAs have already provided individual comments on this document. As an association, we feel this document review provides an opportunity to discuss some concerns shared by our membership. The majority of these concerns are with the “Program Measurement Tool for Adequate and Sufficient Programs” on pages 2-4 through 2-8 of the document. WSBAA recognizes that the intent of the numerical scoring system is to help the Coast Guard identify possible deficiencies within a state RBS program and respond accordingly. We believe in accountability and understand the importance of allocating RBS grant funds for the public good. If the Coast Guard is going to use the program measurement tool going forward, we believe that clarification of the numbers used in the formulas and consistent direction on what data to include in the Performance Report Part II is critical.

WSBAA is seeking clarification on how the formulas that generate the scores in each category are determined. These formulas appear to score our member programs against an “ideal” RBS program, using established ratios for the number of law enforcement officers and equipment based on registered watercraft and a minimum percentage of boaters taking a boater education course. It is not clear to our membership how these numbers were established, and it is worrisome that a state or territory could have its RBS funding jeopardized by an insufficient score in one or more of these categories. Given the diversity of RBS programs represented by WSBAA, it is likely that many of our individual programs score very differently. It is also likely that we are not all reporting the same information on the Performance Report Part II, so some clear direction on what data is necessary would be helpful to include in the document.

In addition to, or perhaps in lieu of, the program measurement tool, we ask the Coast Guard to consider other possibilities for determining whether a program is adequate and sufficient. One suggestion WSBAA would offer is to capture data in the annual Performance Report Part II that helps to identify RBS trends within a state. For example, non-motorized watercraft recreation continues to grow in popularity and member programs are dedicating increased time and resources to this user group. However, the formulas used for program scoring are based on registered vessels and fail to take non-motorized watercraft, the vast majority of which are not registered, into account. Collecting specific data on non-motorized use and program resources expended may help the Coast Guard and states cooperate to develop more meaningful law enforcement and education efforts for the public’s benefit. This type of work may be more indicative of an adequate and sufficient program than a numerical score.

Thank you for considering WSBAA’s comments during the review of this important document. When finalized, the updated State RBS Program Guide will be a useful resource to BLAs and others within our member RBS programs. Should you wish to discuss this matter in detail, please contact me at (307) 262-9349.

Sincerely,



Aaron Kerr

President

cc: WSBAA and NASBLA member BLAs