

RICHARD C. HISCOCK

12 July 1999

Interagency Task Force on the
Roles and Missions of the U. S. Coast Guard
c/o Docket Clerk
U.S. Department of Transportation Dockets
Room PL-401
400 7th Street SW
Washington, DC 20590-0001

Subject: Comments on the Roles and Missions of the U.S. Coast Guard

In response to the 10 June 1999 notice of the Interagency Task Force (64 FR 31343), please accept these as my comments on the Roles and Mission of the U.S. Coast Guard.

INTRODUCTION:

Admiral Rufe at a recent 'Dining In' (see page, 24 USCGA Alumni *Bulletin*, June 1999) said toward the end of his presentation "I get paid to hear the bad news, and you get paid to tell me." The Coast Guard doesn't pay me, but I am going to give you some of my views anyway.

For more than twenty-years I have worked and interacted with Coast Guard personnel— Petty Officers (PO's) at the local Lifeboat Station, Captains at the Group and Marine Safety Offices, District Commanders and their staffs, and civilians, officers and Admirals at Headquarters. I have assisted the Coast Guard with marine safety publications, written marine safety legislation, trained Coast Guard personnel, and served on Coast Guard Advisory Committees and a Task Force. For my efforts I have received the Coast Guard Public Service Commendation, the Certificate of Merit and most recently the Coast Guard Meritorious Team Commendation. All of this effort didn't just happen – I was born into a family dedicated to Marine Safety. Both my parents worked in the Emergency Rescue Equipment Section (the predecessor to the modern SAR organization) during World War II, and before the war my father was a principle traveling inspector in the Bureau of Marine Inspection and Navigation (BMIN).

The enclosed paper – submitted to the U.S. Naval Institute Coast Guard Essay Contest for 1990 – is provided as a foundation for the discussion that follows. The opinions expressed, in that paper, are my own, many Coast Guard people contributed to the effort, but the essence of the message in 1990 – as it is today – is that the Coast Guard needs to define its PURPOSE. The 'roles and missions' will fall into place if we define a 'robust purpose.'

The Coast Guard is – in my opinion – primarily a MARINE SAFETY organization that provides

Roles and Missions of the U.S. Coast Guard

services to the public. It is a LIFESAVING (and law enforcement) organization – dedicated to PROTECTION of life, property and the marine environment. The Coast Guard is NOT – repeat NOT – primarily a military (war fighting) organization.

Ask the ‘person on the street’ if he/she thinks of the Coast Guard as a military organization, or if the Coast Guard is a ‘war fighting’ organization and you get a resounding ‘NO!’ The public thinks of the Coast Guard as a LIFESAVING organization. And, there is good reason for the public to believe that. History is on their side. Four of the five predecessor organizations that make up the current Coast Guard were CIVILIAN, LIFESAVING organizations – the Lighthouse Service, the Lifesaving Service, the Bureau of Navigation, and the Steamboat Inspection Service. Only the Revenue Marine (Revenue Cutter Service) has a naval (and maritime law enforcement) heritage.

When you know you have saved somebody's life, the only word to describe it is euphoria. This is what we join the Coast Guard to do – there are many other missions we have – but this is what we join the Coast Guard to do, save other lives. There is absolutely no better feeling than when somebody says ‘Thanks, you saved my life.’ LCDR Laura Guth, USCG (From Savage Seas; Killer Waves & Rescues a PBS presentation 07/11/1999.)

CORE MARINE SAFETY MISSIONS OF THE COAST GUARD:

- Search and Rescue (SAR)
- Aids to Navigation (ATON)
- Marine Safety – Inspection, Licensing, Investigations (‘M’)
- Recreational Boating Safety (RBS)
- Port Safety and Security
- Environmental protection and response
- Domestic Ice Breaking
- Waterways Management

SEARCH and RESCUE (SAR). The mission is to respond to vessels and people in distress at sea.

The role for Coast Guard is to provide the stations, patrol-boats, cutters, and aircraft, along with highly trained personnel to respond to emergencies at sea. There must no further cuts in the number of SAR units. In fact some that were cut during recent ‘streamlining’ should be restored, as there is no substitute for intimate familiarity with the Area Of Responsibility (AOR) – technology is no substitute for local knowledge.

Currently the experience level of CG personnel assigned to many of these units – particularly the small-boat stations (where the rubber meets the road) – is at an all time low. At one station I am familiar with the average experience is about 2.5 years and that includes the OIC who has almost 30-years of service. Yet new, sophisticated, 47-foot MLB’s are coming on line. The operation of

these million dollar vessels must not be left to inexperienced Petty Officers, yet the number of qualified coxswains is at an all time low.

AIDS to NAVIGATION (ATON). The mission is to install, maintain and ensure the accuracy of a variety of short and long range aids to navigation – from day marks to satellites – to assist in the safe navigation of vessels, ranging in size from the smallest skiff to super-tankers carrying thousand of gallons of hazardous materials. Failure of the ATON system can have disastrous consequences.

The Coast Guard role is to provide the vessels, facilities and trained personnel to do this very technical and sometimes dangerous job.

There is a temptation to think that ATON could be ‘privatized’ – that a private contractor could do the job for less, and do it just as well. There are several problems with this thinking. First, the federal government is ultimately responsible for the accurate placement and operation of all aids to navigation. Oversight is not the answer as soon there will be no one experienced with ATON to oversee the contractor.

Secondly, buoy tenders (and the Coast Guard is investing in modern tenders) provide a wonderful training platform for both O’s and E’ – next to running a motor lifeboat in the surf there is no better place to learn seamanship skills.

MARINE SAFETY. The mission of “the Commercial Vessel Safety Program is first to **prevent** the casualty; second to **minimize** the effect of the casualty, given that it has occurred; and third to **maximize** lives saved, given that the vessel has become uninhabitable. (See: *A Cost-Benefit Analysis of Alternative Safety Programs for U.S. Commercial Fishing Vessels* An issue study conducted by Planning Staff, Office of Merchant Marine Safety, U.S. Coast Guard Headquarters Washington, D.C. 16 April 1971.)

The Coast Guard role is to establish the standards for the design, construction, maintenance and manning of commercial vessels, and inspect them to ensure that they comply with the requirements. The Coast Guard also establishes and enforces the requirements for Merchant Mariners Licenses and Documents. One of the most important roles of the Marine Safety Program is (or should be) the investigation of marine casualties. It is only through the investigation of mishaps that the need for additional legislative authority or new/modified regulations is unearthed.

Today the Marine Safety Program is a shadow of its former self. Gone are the days of former Bureau of Marine Inspection and Navigation (BMIN) and 219-Program personnel, who provided real-life maritime and naval architectural experience. (There was a time when at least 50% of the personnel in the Marine Safety Program were former Merchant Mariners.) Gone too are the days when a junior inspector learned his/her craft by apprenticing with a Senior Inspector with years of experience. Today inspectors go to school and go into the field – most of the time alone. So too with investigators who have little maritime experience and not very much training. Also, gone are dedicated Marine Inspection Offices. Today a Marine Safety Office with limited resources must deal with Marine Safety, Captain of the Port, and Marine Environmental

Response issues. Many Marine Safety functions get little attention.

The Marine Safety Program has – again since the early 1980's – transferred much of its workload formerly carried out by Coast Guard Inspectors to third parties, primarily the Classification Societies, retaining 'oversight'. In the not too distant future it is entirely possible that the Assistant Commandant for Marine Safety and Environmental Protection will have limited or NO experience as a marine inspector or investigator!

It should be remembered that the (marine safety) responsibilities now handled by the Coast Guard were assumed for a reason. The Coast Guard, in most instances, accepted duties which Congress at some point believed were being performed inadequately or inefficiently either by the private sector or by some other agency or federal or state government. If a particular problem is not perceived as serious today, it may be a tribute to, rather than a criticism of, the Coast Guard's regulatory role. Congress should not dismantle a regulatory system which one maritime disaster later will -- in response to a public outcry -- have to be re-assembled. (From SEMI-PARATUS: THE UNITED STATES COAST GUARD, 1981, Oversight report of the Subcommittee on Coast Guard and Navigation, Committee on Merchant Marine and Fisheries, December 3, 1981.)

The Marine Safety Program should be growing – not shrinking. There is much to be done. All together too many commercial vessels in the U.S. are 'uninspected' – particularly fishing and towing vessels. Use of the waterways is ever increasing, as are the risks to passengers, crewmembers and the environment as well. (See Waterways Management below)

We delegate Marine Safety responsibilities at our own peril.

RECREATIONAL BOATING SAFETY (RBS). According to Captain Mike Holmes, Chief of Boating Safety the mission should be to “educate boaters on the risks that they face, give them the knowledge and technology to manage that risk, and they manage that risk, or make a conscious decision *not* to manage the risk, or a real accident occurs that could not have been avoided.” (See April/May *Small Craft Advisory*.) It is Captain Holmes' opinions that “we have a long trip ahead!”

The Coast Guard role in Boating Safety has diminished since the early 1980's. There was an Office of Boating Safety with a knowledgeable technical and educational staff, lead by a flag officer. At the District level there were not only Boating Safety Training Teams, and Boating Safety Detachments (BOSDETS), but there was a Boating Safety Division with a staff of Officers (lead by an O-5) and enlisted personnel. Today Boating Safety is a small office in the Operations Directorate, Gone are the District resources – the Recreational Boating Specialist is Senior Chief PO.

All these cuts come despite an ever-increasing number of recreational boats and a boating public that is not as familiar with safe boating operation as previous generations. Much of the responsibility of boating safety has been turned over to the States, with mixed results. Today there is a growing consensus for 'mandatory boating safety education', but who will take the lead in developing uniform standards for training, instruction and testing? Both the Coast Guard

Roles and Missions of the U.S. Coast Guard

Auxiliary and U.S. Power Squadron provide boating safety courses, but the quality of these courses varies tremendously.

PORT SAFETY AND SECURITY. The mission is to ensure the safety and security of the major ports and the goods – particularly hazardous material – transported through them. It is a critical function during military operations, insuring the safe handling of munitions.

The Coast Guard role in port safety has fluctuated since its origin during World War I with intense activity during all the major military operations.

ENVIRONMENTAL PROTECTION AND RESPONSE. The mission is to prevent and respond to hazardous material spills particularly oil spills.

Since 1990 the Coast Guard role in prevention and response to oil spills increased with the passage of the Oil Pollution Act of 1990 (OPA-90) requiring both an increase in Coast Guard prevention and response capability, and approval of response plans for carriers. Today pollution is a major focus in all casualties, sometimes eclipsing the casualty itself, i.e. there is more emphasis on pollution than there is on the investigation of the casualty itself.

DOMESTIC ICE BREAKING. The mission is to ensure that domestic commerce can navigate safely on the Great Lakes and in the Northeast during harsh winter months. Recent mild winters – particularly in the Northeast – might lead some to believe that this is not an important task. It will only take one frigid winter to remind us that safe navigation of the Hudson River and the Cape Cod Canal are vital to the transportation of heating oil for example.

The Coast Guard role is to provide and maintain a small fleet of ice breaking capable vessels – in particular the nine 140' Bay Class Tugs and the CGC *MACKINAW* (or its replacement) – to accomplish this mission. While some might be tempted the cut or contract for this service it is unlikely that there would be any significant savings and the risks far out weigh the advantages.

WATERWAYS MANAGEMENT is a new concept in this county and encompasses most of the missions outlined above. Waterways Management seeks to provide and plan for the safe use of coastal and inland waters. It is predicted that waterways use will increase several fold in the next decade. Further, water transportation is becoming an increasing important part of the 'national highway system', with ever increasing efforts to relieve highway congestion through the use of passenger ferries, both conventional and 'high-speed.' Without Waterways Management there will be chaos on the waterways, with the conflicts between recreational and commercial traffic creating increasingly unsafe conditions.

The Coast Guard has shown leadership in this area, but it will take a dedicated corps of personnel, who can integrate all the various aspects, of what will prove to be very complicated issues, with a great many conflicting stake-holders. Waterways Management will not be accomplished by short term 'managers'. It will take more than the average 'tour' for most of these problems associated with waterways management to be resolved. If the Coast Guard is to provide the leadership necessary it will have to dedicate specialized personnel for long-term

assignment.

MISSIONS PROVIDED FOR OTHER AGENCIES:

If the above missions were not enough, the Coast Guard is required (asked) to perform many tasks (missions) on behalf of other Federal Departments and Agencies, the major ones being —

- Drug interdiction for Justice (DOJ) and Drug Enforcement Administration (DEA).
- Migrant interdiction for DOJ and Immigration and Naturalization (INS)
- Fisheries Enforcement and Marine Mammal Protection for Commerce (DOC) and National Marine Fisheries Service (NMFS)

Some of these missions have deep roots in Revenue Cutter Service, some evolved in the last century and others are more recent, but all are COLLATERAL to PURPOSE of the Coast Guard as a MARINE TRANSPORTATION SAFETY AGENCY.

These missions are highly technical in nature, involving enforcement of complicated regulations. Others could be more properly classified as law enforcement missions.

There is no doubt that the Coast Guard can and does perform a valuable service on behalf of these other Departments and Agencies; but – in my opinion – the agencies for whom the Coast Guard performs these services must be more involved in carrying out these missions. DEA should provide agents to ride with cutters on drug interdiction patrols, along with INS agents to assist with migrant interdiction. The recent incident in Florida validates the need for highly trained law enforcement (INS) personnel when dealing with explosive issues of refugees political or otherwise.

Here in New England fisheries enforcement has become so complicated that “Even the people at the National Marine Fisheries Service who have to implement the rules admit that they can hardly keep up and are having trouble adequately informing fishermen of the latest in an endless stream of changes. (See Editorial in June 1999 *Commercial Fisheries News*.) Yet we expect junior Petty Officers for whom fisheries enforcement is a collateral duty to be knowledgeable about and enforce these complicated regulations. Further the cutters that these Petty Officers serve on a constantly moving from the Northwest Atlantic to the Mid-Atlantic to the Caribbean. No sooner does a boarding officer think that he/she understands the intricacies of Groundfish Management in New England than the cutter moves to the Mid-Atlantic and he/she is faced with a whole new set of regulations. And Petty Officers at Small-Boat Stations are no better off. The Group/District expects Stations to perform a certain amount of LE/Fisheries patrol, but many OIC’s/CO’s find themselves faced with the option of training for SAR -- the primary responsibility of a Small-Boat Station, and doing fisheries enforcement, not a happy choice.

If the Regional Fishery Management Councils and the NMFS are going to develop complicated management plans and regulations that require ‘at sea’ enforcement then they should step up to the plate and provide the expertise and the agents to enforce THEIR regulations. NMFS says that it doesn’t have enough agents – probably true – well then THEY need to request the additional

resources (dare I say funding) to support what is after all their program.

I realize that the Coast Guard is jointly charged by the Fisheries Conservation and Management Act (FCMA) with enforcement of fisheries management plans, but if I were the Coast Guard I would insist that the Department of Commerce provide both trained personnel and additional funding to provide this service.

A MILITARY ROLE:

On top of the above, the Coast Guard is expected to perform as a military – naval – service, providing Maritime Defense and sending cutters to the worlds hot spots. Most recently this overtaxed and under-funded service sent a High-Endurance Cutter (WMEC) to help keep peace in the Balkans.

If, and this is a big IF, the Coast Guard has a military role to play in the 21st Century it is – in my opinion – to provide to the other military forces those services that they provide to the public in peacetime. In the event of a protracted conflict – war – the Coast Guard could provide Search and Rescue and Salvage, Port Security, Aids to Navigation, Commercial Vessel Safety services just as it does everyday. The Coast Guard should not be called upon to provide combat support to the Navy.

It is important that we clarify the Coast Guard's military role in the 21st Century, as we are embark on a major acquisition project – DEEPWATER, which seeks to design replacement vessels and support systems to the fleet of High and Medium Endurance Cutters. Crucial to the design is the PURPOSE for which these vessels and systems are to be built.

It is my suggestion that the DEEPWATER project consider the design and construction of ocean-going salvage type vessels, similar in design to those built by the Dutch. These are big powerful vessels capable of towing the largest vessels and structures. These vessels could be highly versatile through the use of attachable modules, as is common on National Science Foundation Oceanographic Research Vessels, and could be helicopter capable. During peacetime these vessels would be suited for SAR, fisheries patrol, drug interdiction, immigration control, oceanographic research, and oil spill response. In the unlikely event of a protracted military conflict these vessels would be available to the Navy for SAR and ocean salvage.

If the Coast Guard is to have a military role, then it should be an extension of its peacetime role. It is not just another combat force. Those who desire a naval career in service of their country should join the Navy. The Coast Guard is about saving lives and property, not taking them.

WHAT SHOULD WE DO:

Today the Coast Guard faces a myriad of problems particularly recruiting enlisted personnel and retaining the personnel that it already has. These problems are exacerbated by a strong economy, but cannot – in my opinion – be blamed entirely on competition from the private sector. Several

internal factors contribute to the Coast Guard's personnel problems.

First, is the lack of a clear purpose. The second (which is to some degree contributed to by the first) is the so-called 'multi-mission' nature of the Coast Guard. Finally because of the military (needs of the) service, members who desire geographic stability in order to raise a family and establish roots in a community find themselves being rotated every few years and choose to leave the service. We have dealt with the issue of a Purpose, what can be done about the other issues?

It is time to recognize that Coast Guard personnel, both Officers and Enlisted must – after a certain level of training and experience – be allowed to specialize and to stay in the area where they can provide the most benefit to the service. The Coast Guard needs qualified people in all kinds of specialties – from small boat operators to staff positions. People need to be good at their specialty, and we should not squander their talents.

Going hand-in-hand with specialization is the need to provide geographic stability. As Coast Guard members progress in their professional career they also begin families with a spouse who in all likelihood also has a career. Coast Guard members must juggle the needs of their family with the needs of the service. Providing a degree of geographic stability (along with an ability to become proficient in a specialty) would go a long way to encouraging personnel – particularly the enlisted folks – to continue making a contribution to the Service.

There are other suggestions, some will be considered heresy, well so be it –

One point of accession. ALL Coast Guard personnel, enlisted and officer candidates, enter the same way – through one training institution. Officer candidates should be drawn from colleges and universities, particularly the Merchant Marine Academies, engineering, oceanographic, marine science schools.

ALL personnel assigned – even if briefly – to a small boat station, where they will learn to row a little boat, and qualify as a boat operator. They don't have to qualify as a coxswain of a UTB or MLB, but they should be capable of operating a boat.

Officer candidates – after their first assignment at a small boat station – to attend a Leadership Training (Officer Candidate) School, which could be housed at the current location of the USCGA.

After an initial familiarization period during which the service and the member will have an opportunity to identify their interest and expertise, all personnel should select a specialty for the remainder of their career. Let members do what they are good at.

The USCGA should be turned into a leadership training facility for use by both enlisted and officers throughout their careers. Training and leadership programs in all specialties – SAR, ATON, Marine Safety, Recreational Boating Safety, and Waterways Management – could be provided along with interagency seminars. What is now the Academy should become the center

12 July 1999

Roles and Missions of the U.S. Coast Guard

for training and leadership in Marine Safety and Waterways Management.

We also need to manage the promotion system so that qualified people are not 'fired' just because they are not promoted – in recent years too many highly qualified personnel have been forced out. The 'system' must undergo wholesale reform. Far too much emphasis is placed on 'up or out' and full-filling the necessities of the OER. The service is losing far too many qualified officers and promoting those who have become expert at the OER management system.

I am reminded of a statement by then Captain (later Admiral) Grace Hopper USN) regarding leadership: "You manage things, and lead people." Good advise for any public service organization. Any promotion systems should recognize LEADERSHIP.

CONCLUSION:

Some would say that a Coast Guard with a stable, specialized workforce, but without the Academy, OER's would be a civilian organization. Maybe, but it could be a UNIFORMED service/organization with the same discipline and chain-of-command found in a police/fire or other law enforcement organization. There are several models within the Federal structure – National Park Service Rangers, the Marshall's Service, and the NOAA Corps, to name just a few.

The point is to think creatively about what the Coast Guard should be in the 21st Century – not what it looked like in the past. Or to put it another way: If we were creating the Coast Guard today – on a blank sheet of paper – what would it look like. In many respects we are both hindered and helped by the past. The Coast Guard is an amalgam of many organizations and many missions. It has no clear-cut PURPOSE, but it desperately needs one. So if you do nothing else during your deliberations please define a robust PURPOSE for this fine organization, and let us get back to the CORE missions of saving life and property.

There is much more that I could say about my favorite public service organization, but I won't, I thank you for listening. Please do not hesitate to contact me should you or your staff have any questions regarding my comments.

SEMPER PARATUS,

/Signed/ 7/12/1999

Richard C. Hiscock

Enclosures: (1) "Whither Goes the U.S. Coast Guard", 20 May 1990.
(2) Resume