



**BoatUS**



**NMMA**

National Marine  
Manufacturers Association

March 31, 2020

Director Christopher C. Krebs  
Cybersecurity and Infrastructure Security Agency  
Department of Homeland Security  
245 Murray Lane  
Washington, D.C. 20528-0380

Dear Director Krebs,

On behalf of the recreational boating industry, we are writing to request further clarification and inclusion of marine supply, service and repair facilities and marinas in the CISA Guidance on the Essential Critical Infrastructure Workforce. Marine supply, service and repair facilities as well as marinas provide year-round essential marine services that are needed to ensure law enforcement access, public safety and protection of property.

As associations representing marinas, boatyards, marine retailers and recreational marine manufacturers, we know the critical needs of marine first responders, as well as the importance provided by on-site monitoring of marinas and repair facilities.

CISA guidelines recognize the importance of the repair and maintenance of vessels for those that encompass movement of cargo and passengers. While the language implies that employees working on non-commercial vessels are considered to be Essential Critical Infrastructure Workforce, we believe it is appropriate to provide a clarification by inserting the following language:

*Employees who repair and maintain vehicles, aircraft, rail equipment, marine vessels, bicycles, and the equipment and infrastructure that enables operations that encompass movement of **non-commercial vessels**, cargo and passengers.*

In addition to clarification on these businesses, we ask that your designations for Essential Critical Infrastructure Workforce be amended to specifically include staff who provide repair and maintenance services at dealerships boatyards and marinas, as well as those who provide other services at marinas, docks and boatyards. We are not asking that dealerships be allowed to open their showrooms for sales to the public.

Staff are needed to operate, monitor and provide services at marine facilities for the following reasons:

- **Law enforcement access:** Many marinas and boat dealers store, service and repair law enforcement boats from the local to federal level. Marinas often provide slips and critical access to the water for law enforcement during times of emergency. In addition, towing and salvage services are important to maintaining safe and navigable waterways.

- **Public Safety:** If marina employees cannot consistently monitor the property, boats either in the water or stored on site present a significant danger to the facility and neighboring properties, businesses and residences. These hazards can be in the form of
  - electrical hazards,
  - fires,
  - fuel and other pollution spills or
  - property damage caused by boats breaking free from moorings during storms, unusual tides or equipment failures.
- **Liveaboard residents:** Families live aboard their vessels either in marinas or on mooring balls affiliated with a marina. Residents need access to their homes. For those renting mooring balls, they need access to dinghy docks so they can access land. If marina fences are locked, they cannot exit the facility to buy food and other essential supplies.
- **Gasoline availability:** Just as fuel for automobiles is essential, so too is access to fuel for those who launch their boats at ramps or have them moored behind their homes.
- **Safe activity for families:** Boating, if done only with those from the same household, maintains social distancing while also providing a “reset” for the many people who now are entering the fifth week of social distancing.

In the interest of public safety, essential protection of property and in support of law enforcement needs, we ask that you amend your guidelines to designate marina operations and boat repair/maintenance and operations staff as essential.

Signed,

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