

Slack Tide

Newsletter Of The
CALIFORNIA ASSOCIATION OF HARBOR MASTERS & PORT CAPTAINS
Vol. XXVII DECEMBER 2014 No. IV

From The Helm

By Steve McGrath,
President
CAHM&PC

A LOOK BACK ON 2014
As I write this, I'm in my office, following the radio comms between Harbor Patrol and the office as the rain comes down, the wind blows and the HP is out there checking on all the boats on moorings. As an open ocean harbor, these storms affect us a lot, especially when from the south. So Harbor Patrol is out doing regular checks on mooring connections, the office is updating owners of observed problems and we're hoping to get through this safely, with no property damage. In January 2010, we lost eight boats in one day!

It's December, and time to reflect on one year and prepare for the next.

For the Association, the event of the year, and the focus of a lot of effort, was of course our annual training conference in Santa Barbara. Suffice to say here that it was a great few days... look elsewhere in Slack Tide for more about the event.

During 2014, your Association tracked and commented on various legislative issues, most notable SB 941, the 'vessel operator card' or 'boater education' bill, sponsored by Senator Bill Monning. After much discussion, this was signed by Governor Brown on September 18. The bill requires the phased in development and implementation of an operator card program, by the Division of Boating

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2014 "AT A GLANCE"

By Bill Krauss, The Apex Group

In October, I provided the Association with a comprehensive report on the legislation and issues we faced in 2014. Due to the space constraints of this article, the following is an abbreviated summary of that report. If you would like the complete report, please contact us and we will provide you with a copy.

Mandatory Boater Education (SB 941 Monning): Signed by the Governor

The "mandatory boater education" issue has been a topic for years. However, there has always been some reason that a bill never came to fruition, until this year. The primary challenge has been that there are people on all sides of this issue. Some think a strict licensing regime is required, while others do not want any form of mandatory licensing or education. This disagreement among the stakeholders has slowed the progress of any bill.

All of this was overcome this year with the passage of SB 941. It is fair to say this bill is a good balance among the various points of view. To strike this balance, the bill requires that boaters must pass an exam, but not complete an extensive boating safety course. Likewise, once the test is passed, the certificate is good for life, which is in contrast to a license that can be suspended or revoked.

The bill also has a phase-in period over many years to ensure a smooth transition to complete certification.

One policy area that was left "open" for future consideration was the treatment of rental operations. Rental operators are unique in that a significant financial or time burden could cause customers to simply walk away, unlike a boater who can take the test at their leisure. Given this sensitivity, I worked all year to craft language that would allow for a quick and effective test that would work for these businesses.

We were concerned that an online test that would require an internet connection that was 100 percent reliable would be a challenge in remote settings. I proposed allowing the operator to offer the test and keep the records, thereby eliminating the need to be online all the time, but there was concern that this would not provide enough accountability.

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Slack Tide

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SUE GROSS, Executive Secretary

HELM From Page 1

and Waterways, for operators of vessels propelled by an engine. Your Association was generally supportive of the intent, but took neither 'support' nor 'oppose' position, believing that the requirement should have been more broadly applied to operators of all vessels. We also kept a close eye on issues related to TMDLs, to the continuing organization of DBW, and to budget issues at the State level. We could not do this without our continued association with Bill Krauss and the Apex Group, from Sacramento. We are a part of a coalition of marina and harbor related organizations that collectively retain the services of the Apex Group to monitor and advocate for the interests of our respective and collective interests in Sacramento. It's a great set up that works well for us all.

Your Association continued its strong support of the Clean Marinas program, through the extremely dedicated efforts of Board member Diane Isley from Emery Cove. This program continues to grow, and, having passed the five year mark, is now seeing a number of marinas and harbors renewing their certifications. To date, 124 marinas have been certified, and 70 recertified. This is an impressive display of commitment to our environment. I know when Port San Luis went through the program, it was gratifying to see that we already in fact were doing many of the things required for certification. An association has more reach than an individual organization, and a group of associations even more so. This is the model we use in our legislative advocacy in Sacramento, but also, we have teamed up with others to develop a marina economic impact model. Coordinated by the Association of Marina Industries, this research will develop useful economic data on the impact that our industry has on our local and regional economies.

Your Association splits the State in two, North and South, with Morro Bay being the most northerly of the southern region. Every year, there are regional meetings held in various locations in both north and south, and 2014 was no exception: in the northern region, a meeting at Redwood Shores was well-attended. The group discussed the impacts of the drought on marina operations, commercial fishing in the San Francisco Bay and Central Coast, and shared information about abandoned vessels and "sneak-in" tenants.

Down south, two Southern California Regional meetings were held in the Port of Los Angeles. In May, members and vendors visited and toured the Maritime Law Enforcement Training Center. A guest speaker from the Federal Law Enforcement Training Center (FLETC) spoke of new programs available on the west coast for law enforcement personnel to better serve California boaters. Mid-September the meeting was conducted aboard the USS Iowa Battleship. The day ended with an impressive private walking tour.

In closing, it has been a privilege to serve as Board President this year. I have learned, stretched and grown through the experience; I've met great people, and deepened relationships. And more than anything, my appreciation for this association, this industry and the great people who work in it has expanded tremendously. Thank you for the honor of service.

HAPPY NEW YEAR!

GLANCE From Page 1

In the end, the logistics of crafting an efficient and reliable test became too complex and the Chair of the Assembly Transportation Committee required that we exempt rental operations for now. However, it is understood that this issue may get revisited at a later date after the State has had a chance to evaluate the program's effectiveness.

AB 2402 (Buchanan) – Invasive Aquatic Species: Support – (Signed by the Governor)

Under existing law, the state Department of Food and Agriculture (DFA) operates the “noxious weed control program.” The Division of Boating and Waterways (DBW) also operates an “invasive species” program to control and eradicate species that are a hazard to navigation. Although the DFA program does not directly serve the boating community, this bill makes changes to that program that would make it possible to conduct some work in areas of the Delta that are of concern to boating, augmenting the DBW program efforts. For this reason, we supported the bill throughout the year.

SB 1162 (Berryhill) – Boating Violations: Support – (Signed by the Governor)

This is a unique bill in that it reclassifies various boating violations down from a misdemeanor to an infraction. It may seem counterintuitive to reduce a penalty, but since the violations that have been reclassified are minor in nature, law enforcement had been reluctant to cite vessel operators due to the severity of the punishment.

For example, one violation that was reduced was mooring a vessel to a buoy. This violation should be punishable, but the severity of a misdemeanor generally causes law enforcement to be reluctant to take action, resulting in no enforcement at all. Now that it is an infraction, proper enforcement can take place. We sought and received various technical amendments, and the bill moved easily through the process and was signed into law by the Governor.

Marina Del Rey TMDL

This year, the Los Angeles Regional Water Quality Control Board adopted a “Total Maximum Daily Load” (TMDL) in Marina Del Rey harbor. A TMDL is a regulatory rule that allows the regional water quality control board to take actions to mitigate the impacts of a particular pollutant when it has exceeded the legal limit, such as copper in this case. Because the copper levels at Marina Del Rey are so high, and have been identified as coming primarily from the anti-fouling hull paint on boats, the focus of the mandated actions are on the boaters. Vessels hull paints will have to be converted to non-copper alternatives and extensive dredging will be required of the harbor. The costs will run into the millions.

Clearly, this is of concern to the boaters in Marina Del Rey, but why should boaters statewide care? Marina Del Rey is just symptom of the larger problem. There are many other TMDLs pending throughout the state and will see action in the coming years. When the rules for each of these locations are finalized, they will very likely result

in impacts to boater in one form or another. The problem started in San Diego Bay many years ago in Shelter Island Yacht Basin, which is currently operating under a copper TMDL.

Our challenge is that copper is the most effective anti-fouling paint and alternative coatings are not fully developed. That reality is in contrast to laws that require reduced levels of copper in the water. One ray of hope is a process that is currently under way at the Department of Pesticide Regulation (DPR). DPR must approve all paint formulations and can mandate that manufacturers reformulate to meet a specific goal. They are now working on a plan to require the reformulation of copper anti-fouling paint to reduce the copper content, yet keep it effective. This process was initiated in response to AB 425 from last year that was enacted specifically to drive this reformulation process in an effort to address the copper issue.

That process will take some time, maybe years, and it remains to be seen if reduced copper in the paint will be enough to stop the various water boards from restricting boating and/or the use of copper.

We engaged in the Marina Del Rey TMDL process with the goal of setting a precedent for future TMDLs around the State. We reasoned that if we can get the best possible outcome in this case, other agencies will look to this as an example of how to proceed. Our immediate goal was to pursue a delay by the State Water Resources Control Board, which must approve the Regional Board action. We argued that delay would give Marina Del Rey time to use the new testing method to determine the real impacts. We met with the State Water Resources Control Board members, the Executive Office of the LA Regional Water Quality Control Board and various staff and Los Angeles County.

A delay was not possible, but we were able to get language in the resolution adopting the action that should the BLM be adopted by the USEPA they will take another look at their decision. I have to give a special “thank you” to Kevin Ketchum from the Marina Recreation Association who took a “deep dive” to learn all about the technical aspects of this issue and served as the lead on driving this issue...thanks Kevin!

Marine Protected Area (MPA) Comment Letter

This issue falls into the category of “preventative medicine.” We submitted a comment letter on a “draft” plan related to the Marine Protected Area program. Specifically, the report was entitled: “The California Collaborative Approach: Marine Protected Areas Partnership Plan.” In essence, this is a report outlining how to proceed with the ongoing management of the MPAs.

In this report, they identified vessel registration fees as a source of funding for the program. Although it was just a report and not any particular change to law or regulation, it was important to put them on notice that such a move would be ill-advised and possibly illegal.

NEW MEMBERS

Welcome aboard to the following new members recently approved by the Board of Directors.

Larry Lizotte, VP Sales
Marine Fenders Int'l., Inc.
909 Mahar Ave.

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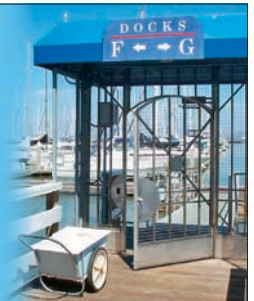
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Winterize Your Boat

By **Mick Kronman**, Harbor Operations Manager

(Editor's Note: The following information is being shared by Santa Barbara Harbor. Please feel free to plagiarize for your own marina!)

Recent winters have been very mild but it doesn't take much wind or rain to cause major problems, including damaging or sinking an unattended boat. Here are some reminders:

- Early Warning. Monitor weather reports. Visit your boat before the next storm. If you can't check your boat, find a responsible person who can.
- Dock lines. Visually inspect for chafe, wear and trip hazards (please don't run mooring lines across fingers). Tie lines securely to cleats or pilings; consider chafing gear and doubling-up lines. Replace worn lines.
- Dock obstructions. Don't store kayaks or other items on the dock.
- Bilge check. Test your bilge pump to ensure that 1) it's working; 2) float switches properly activate the pumps; and 3) float switches aren't hindered by debris. Be sure limber holes aren't blocked.
- Fenders. Have an adequate number of appropriate-sized fenders.
- Sails, roller furlings, rigging, tarps, loose gear on deck. Store or tightly secure.
- Hatches, ports and windows. Close and secure. Make sure they're water-tight.
- Appliances: Make sure appliances like space heaters are not left unattended.
- Dock boxes: Do not store flammables in dock boxes. In case of electrical short at the power pedestal, fire or explosion could result.
- Consider. Removing valuables and electronics, installing a dehumidifier or moisture absorber, propping up cushions and opening the boat during periods of fair weather to circulate air.
- Contacts: Update emergency contact phone numbers and email address with the marina/harbor.

Here's to a safe winter, in the slip or on the ocean.

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SAVE THE DATE!!

67th Annual Training Conference & Trade Show October 5 - October 8, 2015 South Lake Tahoe, California

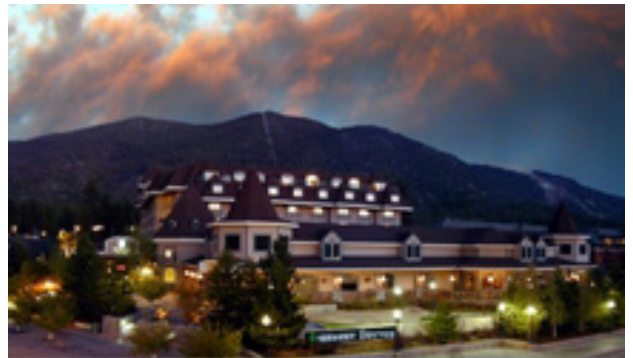
The 2015 Training Conference and Trade Show location will be at the Lake Tahoe Resort Hotel in beautiful South Lake Tahoe, California.

Lake Tahoe is home to 17 marinas, 3 boatyards, Coast Guard Station Lake Tahoe, and numerous anchorages, launch ramps and other boater services.

Lake Tahoe boaters and marinas enjoy beautiful, calm conditions during the spring and summer, and endure heavy weather during the winter.

Plan to enjoy sunny days and cool nights surrounded by the gorgeous fall colors of the High Sierra! Activities near the conference hotel include boating, hiking, bike rentals, horseback riding, and golf.

You will be notified as more detail becomes available or can see updates at www.harbormaster.org. See you in Tahoe!



COAST GUARD DROPS CODE LABELS FOR PERSONAL FLOATION DEVICES

In a move intended to reduce confusion and simplify requirements for recreational boaters' use of Personal Floation Devices (PFDs or "life jackets"), the Coast Guard on October 22nd eliminated its "code-labeling system" for PFDs that currently specifies requirements for PDF use in five different categories. PFDs currently range in "Type Categories" labeled I-V from what the Coast Guard refers to as "Nearshore Buoyant Vests" to "Floation Aids" to "Offshore Lifejackets" for extended survival in rough, open water.

Removing type coding is the first step in a multi-year process that includes designing new labels and developing new PFD standards that would "harmonize" with international standards adopted by SOLAS (Safety of Life at Sea), an international treaty whose roots date to the sinking of the Titanic. When that is accomplished (possibly by 2017) manufacturers can have jackets approved under the new standards, and jackets without the current code labeling should hit the market.

Life-jacket manufacturers will continue to use Type I-V coding until new regulations and labels are designed and approved. Current life jackets that have Type 1-V coding are good for the useful life of the PFD.

California Coastal Commission Draft Sea Level Rise Guidance and Coast Hazards Analyses

By Kathy Ketteridge and Alyssa Cannon, Anchor QEA

New construction of or upgrades to existing infrastructure located within the Coastal Zone will need to consider sea level rise as a potential coastal hazard to the proposed project as part of the California Coastal Commission's (CCC) planning and regulatory process. The California Coastal Act requires that all new development minimize exposure of the proposed project and adjacent areas to hazards from erosion, wave attack, wave run-up, flooding, and now, sea level rise. This requirement includes impacts from sea level rise itself (rising water levels) and impacts due to increased erosion, potential for wave attack, etc. that could occur due to increases in mean sea level. Ideally this evaluation should be included with the permit application, so that potential delays due to requests for additional information from the (CCC) can be minimized.

The coastal hazards analysis should evaluate whether the proposed work, adjacent project site area (i.e. shoreline, dry beach area) and areas adjacent to the project site could be subject to these coastal hazards currently, or in the future based on predicted increases in mean sea levels. In addition to outlining the specific hazards for a proposed project, the frequency of occurrence of these hazards, consequences and options for siting or designing the project to avoid or minimize impacts are also required as part of the evaluation. The amount of sea level rise that needs to be considered is based on future predictions over the design life of the structure. The CCC may consider the typical design life of a structure to be 75-100 years for this analysis even if the actual design life of the structure is anticipated to be shorter. This type of evaluation could range from a relatively focused review of site conditions to a full coastal hydrodynamic and wave model of the project area, depending on the scope and potential environmental impacts of the project.

The California Coastal Commission has developed a draft sea level rise policy guidance document to provide information on how to conduct this evaluation to address sea-level rise in local coastal programs and in project-specific coastal development permits. The guidance document also provides a summary of the science behind sea level rise estimates, projections of sea level rise through 2100, an overview of Coastal Act policies that are relevant to sea level rise and coastal hazards, resources available from local entities and other state agencies, and proposed research needs and next steps.

The California Coastal Commission solicited public comment on the *Draft Sea-Level Rise Policy Guidance*

document between October 2013 and February 2014. A final version of the guidance document is expected to be released after public comments are evaluated. In the meantime, the complete draft guidance document (with all appendices) is available for reference on the CCC website at the link below:

<http://www.coastal.ca.gov/climate/SLRguidance.html>

A list of public comments that the CCC received on the draft guidance document during the public review period (through February 14, 2014) is also available on the CCC website at the link below:<http://www.coastal.ca.gov/climate/SLR-DRAFT-Guidance-Comments.html>

Feel free to contact Dr. Kathy Ketteridge at kketteridge@anchorqea.com or Alyssa Cannon at acannon@anchorqea.com should you have any questions about the CCC's sea level rise guidance or how it might apply to your project or facility.

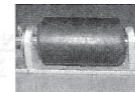
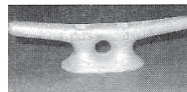


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NMFS Releases Statewide Eelgrass Mitigation Policy

By Jack Malone and Adam Gale, Anchor QEA

Love it or loath it, we share our marinas, ports, and harbors with one of the few flowering plants that lives in the marine environment. Known as eelgrass (*Zostera* spp.), this plant inhabits shallow coastal waters throughout California. Eelgrass provides physical, biological, and economic benefits, and eelgrass is considered to be a valuable resource afforded special status by the regulatory and resource agencies. As a result, projects with the potential to directly or indirectly affect eelgrass come with multiple levels of local, state, and federal oversight focused on avoiding and minimizing eelgrass impacts, and mitigating the unavoidable impacts. In an attempt to develop a more comprehensive policy regarding eelgrass mitigation in California, the National Marine Fisheries Service (NMFS) West Coast Region released the California Eelgrass Mitigation Policy and Implementing Guidelines in October 2014. This policy, known as the CEMP, supersedes existing eelgrass mitigation policies in California, including the Southern California Eelgrass Mitigation Policy (SCEMP).

In 2012, NMFS solicited public input on a draft version of the CEMP and received many comments on the draft policy from a diverse group of stakeholders. The final version of the CEMP was released in October 2014 with the stated goal to “increase efficiency of existing regulatory authorities in a programmatic manner, provide transparency to federal agencies and action proponents, and ensure that unavoidable impacts to eelgrass habitat are fully and appropriately mitigated.” In general, the goals of the CEMP are consistent with the goals of the SCEMP, but there are key differences between the two policies. Because the CEMP has the potential to affect any maintenance or development project where eelgrass may occur, it is important to understand the policy as it relates to your geographic region and your harbor, port, or marina. Although it is beyond the scope of this article to explore the nuances of the CEMP, we have listed some key points to help understand the changes that the CEMP will bring:

- Unifies eelgrass mitigation recommendations for all of California
- Suggests geographically focused mitigation ratios
 - For example, in southern California (Mexico border to Pt. Conception), the suggested ratio is now 1.38:1, while in the San Francisco Bay area, the suggested ratio is 3.01:1.
- Acknowledges four types of compensatory mitigation options, including comprehensive management plans, in-kind mitigation, mitigation banks and in-lieu-fee programs, and out-of-kind mitigation
- Outlines new eelgrass mapping and survey guidelines, including a greater emphasis on the use of reference sites
- Provides a definition of “eelgrass habitat” that includes a 5-meter perimeter of unvegetated area bordering any eelgrass and does not address mitigation for “potential eelgrass habitat”
- Lists potential avoidance and minimization measures that may be incorporated into proposed projects to reduce impacts to eelgrass
- Recommends use of the NMFS Office of Habitat Conservation Mitigation Ratio Calculator to determine appropriate project-specific mitigation ratios based on quality and quantity of ecological functions

So, how does the CEMP affect you, your customers, and your operations? The permitting process for marine or waterfront maintenance or development projects will remain the same. The CEMP does not affect the jurisdiction or regulatory purview of agencies like the U.S. Army Corps of Engineers, Regional Water Quality Control Board, and California Coastal Commission. However these agencies will coordinate with NMFS when they are reviewing proposed projects and consider their recommendations regarding eelgrass. Although the other agencies are not required to follow the CEMP or agree with all NMFS recommendations, they will likely continue to defer to NMFS as eelgrass experts and condition their permits to require that the policies and procedures outlined in the CEMP be followed.

The CEMP may be accessed online at the following link: <http://noaa.federalregisterwatch.com/a/2014/November-7/2014-26467/NOAA-availability-report-california-eelgrass-mitigation-policy-implementing-guideline> Feel free to contact Dr. Jack Malone at jmalone@anchorqea.com or Adam Gale at agale@anchorqea.com should you have any questions about the CEMP or how it might apply to your project or facility.

Orange County Register's Person to Watch

CAHM&PC Director and Dana Point Harbor Director Brad Gross was featured in the December 28, 2014, Orange County Register as one of the top 15 people who will shape Orange County in 2015 and beyond.



Brad Gross

Job: Director of the OC Dana Point Harbor

Background: Gross, 54, was a harbor master in San Francisco before becoming director of the OC Dana Point Harbor in 2007. As director, the Orange County native is tasked with weighing the interests of boaters, merchants and visitors while advancing a project to revitalize the harbor.

Why he's one to watch: Gross' objective is to get the go-ahead for up to \$170 million worth of renovations to the land around the harbor. By late 2015, road construction will begin along Dana Point Harbor Drive, adding median signs and intersections. Dredging of the harbor may also begin next year.

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Clean Marinas

The Clean Marinas program is a partnership of private marinas, government marinas and yacht clubs. The program was developed by marine industry volunteers to create a marina facility stewardship program for the purpose of protecting our waters from pollution. Through education and the use of Best Management Practices (BMP'S) we work with marina operators, yacht clubs and municipal port authorities to gain certification. For information on how to become a certified Clean Marina visit our web site at www.cleanmarina.org.



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Conference Recap 2014

By Steve McGrath, President CAHM&PC

It seems as if the conference has already faded into history, but it was only a couple of months ago that we were in Santa Barbara at the 66th Annual 'Docks and Dollars' Training Conference. Personally, I enjoyed the mix of general interest and detailed presentations. Some of you completed the e-mail surveys that were sent out every day – thank you for that participation; it really helps plan and improve next year's conference. Of those that did, some interesting data:

-This was the first conference for over a third of the respondents.

-Almost 90% registered on line – a new process for us, and this tells us that people liked the convenience.

-Format seems to be a challenge; it's important to keep the sessions on track, but a desire was expressed for time to interact with the speakers after each presentation. We'll take a look at that and see how it may improve for next year.

-There seems to be a need for specific and detailed sessions by subject matter experts.

I'm not going to recap every session but I do want to thank all of the sponsors that made the event possible, the Board members who volunteered time and effort to make it happen (and especially Mick Kronman from Santa Barbara), and our Executive Secretary, Sue Gross.

There was time for socializing, including a gorgeous sunset cruise on a large catamaran, plenty of time for discussions in the trade show, and learning opportunities aplenty such as property management, parking issues, storm water, dock construction, as well as general interest topics, including the LA/LB port complex, leadership and adversity, boat building and white sharks. We were pleased to have Santa Barbara resident, former model and international businesswoman Kathy Ireland welcome the attendees, and Colonel Kimberly Colloton, 60th Commander of the Los Angeles Division of the U.S. Army Corps of Engineers, and Captain Jennifer Williams, Sector Commander U.S. Coast Guard for Los Angeles/Long Beach close out the conference for us.

No recap of this conference would be complete without recognizing the members of the Board of Directors who will be retiring from the board at the end of this year. I'm sure I join all of you in expressing a heartfelt thank you to Brad Gross from Dana Point, Diane Isley from Emery Cove, Mick Kronman from Santa Barbara and Tom Welch from Westrec Marinas. With decades of service represented, the loss of the members will be keenly felt, but, as was to be expected, all offer their continued support to the Board and the Association.

2014 was long on awards with our dynamic member-

ship and Board of Directors out there doing good stuff deserving of recognition.

Certificates of Appreciation were awarded to Kathy O'Brien of Sun Harbor Marina and Pat Bagan, Vice President/General Manager of Sierra Boat Company in recognition of their leadership and unwavering support of the Clean Marinas Program.

Distinguished Service Awards were presented to Vivian Matuk of Boating and Waterways for her many and extraordinary contributions to the industry, to Ramona Fernandez of Boating and Waterways in recognition of her leadership and improvements related to the AWAFF and VTIP programs, and posthumously to Ben Carlson, Newport Beach, California Lifeguard who gave his life in an effort to save another in the call of duty.

Plank Ownership and Life Membership were bestowed upon recently retired Channel Islands Harbormaster Jack Peveler and Westrec Marina Manager Tom Welch for their long membership and service to the Association.

Mick Kronman of Santa Barbara Harbor, Diane Isley of Emery Cove Yacht Harbor, Tom Welch of Westrec Marinas and Brad Gross of Orange County Dana Point Harbor were all recognized by President McGrath for their long service on the Board of Directors and contributions to the Association over decades in all instances.

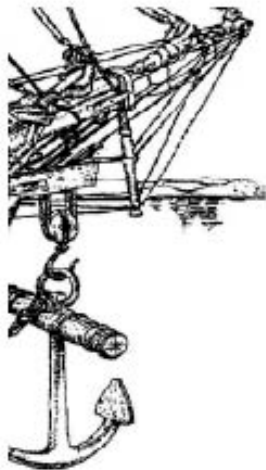
President Steve McGrath was honored with the traditional Port Captain of the Year Cup in recognition of his service and sacrifice to the Association during his year of presidency.

And finally, Scott Grindy of the San Mateo County Harbor District was presented the Harbor Master of the Year award for epitomizing the position of Harbor Master and for his extraordinary efforts to advance the professionalism, efficiency and stature of his District.

If you weren't able to attend, or you need a refresher on some of the great information presented, all the presentations are on your Association's website at www.harbormaster.org.

All in all, it was a great time, and I for one will be looking forward to next year's conference – details to follow!

**2015 CONFERENCE & TRADE SHOW
SAVE THE DATE
OCTOBER 5, 8, 2015
SOUTH LAKE TAHOE, CALIFORNIA**



CALIFORNIA ASSOCIATION OF
HARBOR MASTERS & PORT CAPTAINS
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