

## Oil Spill Task Force

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Docket Management Facility (USCG –2003-14878)  
U.S. Department of Transportation, Rm. PL-401  
400 Seventh St. SW  
Washington, DC 20590-0001  
Docket Management System at <http://dms.dot.gov>

**Re: Automatic Identification System: Expansion of Carriage Requirements for US Waters**

Dear Madam/Sir,

These comments are submitted on behalf of the Pacific States/British Columbia Oil Spill Task Force, which represents the oil spill regulatory agencies of Alaska, British Columbia, Washington, Oregon, Hawaii, and California. The Task Force member agencies appreciate this opportunity to comment on the Expansion of AIS Carriage Requirements for US Waters.

The Oil Spill Task Force co-chaired a project with the US Coast Guard Pacific Area from 1999 to 2002 called the West Coast Offshore Vessel Traffic Risk Management Project. The goal of the project was to reduce the risk of collisions or drift groundings caused by vessel traffic transiting 3 to 200 nautical miles off the West Coast between Cook Inlet in the North and San Diego in the South. Vessels of concern included tank, cargo/passenger, and fishing vessels of 300 gross tons or larger.

We assembled a Workgroup of 40 persons representing the West Coast states and USCG Districts (not including Hawaii), the Canadian Coast Guard and Transport Canada Pacific Region, the Cook Inlet Regional Citizens' Advisory Council, shipping interests as represented by the BC Chamber of Shipping, the Puget Sound Steamship Operators, the Western States Petroleum Association's Marine Committee, TeeKay Shipping for INTERTANKO, the American Waterways Operators, BC's Council of Marine Carriers, the Marine Exchange of Puget Sound, the Washington Public Ports Association, the Portland Merchants Exchange, the Port of Portland, the Pacific Merchant Shipping Association, and the Chamber of Shipping of America. Workgroup members also represented the Council of American Master Mariners, NOAA HAZMAT and National Marine Sanctuaries, the US Navy and Canadian Maritime Forces, Pacific Headquarters, the California Coastal Commission, and Save Our Shores.

Working together, this Workgroup collected and reviewed data on typical coastwise traffic patterns, traffic volume, existing management measures, weather data and ship drift patterns, historic casualty rates by vessel type, the availability of assist vessels, the environmental sensitivity of the coastlines, socio-economic consequences of a spill, and projections of relevant future

initiatives. Using the drift and tug availability data, they modeled likely tug response times under both average and severe weather conditions.

The Workgroup then developed a Relative Ranking/Risk Indexing Worksheet that evaluated nine risk factors: volume of oil/vessel design; drift rates; areas of higher collision hazards; distance offshore; weather/season; tug availability; coastal route density; historic casualty rates by vessel type; and coastline sensitivity. Using this tool, they developed and ranked a total of fifty-two casualty scenarios in all the West Coast jurisdictions. These were then extrapolated into 1,296 additional scenarios on the West Coast, a modeling process which defined both average and “higher risk” areas from Alaska to California.

Workgroup members then addressed four risk factors most amenable to change: tug availability, collision hazards, historic casualty rates by vessel type, and distance offshore. They developed a set of draft findings and recommendations using the criteria that the findings and recommendations had to be supported by the data, realistic (capable of being implemented), effective, economically feasible, and flexible enough to allow for incorporation of new technology and changes in policy.

From December of 2001 through March of 2002, the Project Co-chairs, the Task Force Executive Coordinator, and Workgroup members presented these draft findings and recommendations to affected stakeholder groups and at public meetings in Alaska, British Columbia, Washington, Oregon, and California. The draft Findings and Recommendations were also available for comment on the Task Force website. At a final meeting in April of 2002, Workgroup members agreed to the consensus Findings and Recommendations found in Part VI (pages 57-62) of the final report of the West Coast Offshore Vessel Traffic Risk Management Project Workgroup, which is available on the Task Force website at <http://www.oilspilltaskforce.org>.

In particular, I draw your attention to Section III of Part VI, Findings and Recommendations regarding Rescue Tug Availability. Items 1-3 summarize study data that inventoried 182 ocean going tugs on the West Coast at that time (all exceeded the AIS carriage threshold in length and horsepower). Workgroup analysis indicated that 77 of these tugs would be capable of severe weather rescues based upon the bollard pull necessary to operate in such conditions. The Workgroup further found that the International Tug of Opportunity System (ITOS) operating in the Strait of Juan de Fuca and Puget Sound provides information on the location and basic capabilities of tugs which participate in the ITOS system by carrying transponders, although ITOS did not guarantee their availability, of course. Item 4 in Section III of Part VI reads as follows:

1. The Workgroup finds that it would be beneficial to enhance tug location and capability information coastwise. The Workgroup recognizes that International Maritime Organization (IMO) mandated AIS carriage, as well as US domestic requirements for AIS carriage, should be in place for tugs no later than 2008, or 2004 as currently proposed by pending US legislation.\* The Workgroup therefore recommends that the US Coast Guard evaluate whether the information to be available through AIS carriage will provide equivalent or better tug location and capability information than that provided by ITOS. If so, the US Coast Guard should take steps to ensure that this information on possible rescue tug locations is made available to all Captains of the Port on the West Coast. If not, or if the carriage requirements are not implemented by 2008 at the latest – optimally by 2004 – we recommend that the US Coast Guard consider placing transponders on ocean-going tugs not already carrying them, and adding signal receiving stations as needed to establish a coastwise network for information on ocean-going tug locations.

\*NOTE: This language was adopted in April of 2002 and was referencing legislation that became the Maritime Transportation Security Act.

Therefore, as the US Coast Guard evaluates expansion of AIS carriage requirements, we urge you to ensure that ocean-going tugs, capable of rescuing disabled vessels, be required to carry AIS equipment as soon as possible. Furthermore, the US Coast Guard Pacific Area should ensure that a system is in place to track such tugs and provide information on their locations to COTPs who may be faced with responding to disabled vessels. This may require carriage and information tracking beyond and between VTS areas.

The Pacific States/BC Oil Spill Task Force also commends the US Coast Guard for its stated intent to expand the safety and security benefits of AIS by extending the shore-tracking surveillance capability throughout our Nation's waterways as a major element of maritime domain awareness. The West Coast Offshore Vessel Traffic Risk Management Project Workgroup also generated consensus recommendations (Section IV of Part VI) that vessel traffic transiting coastwise between West Coast ports voluntarily stay a minimum distance offshore of 25 nautical miles (nm) for non-tank vessels of 300 GT or larger, and 50 nm for tank vessels carrying crude oil or persistent product. Enhanced maritime domain awareness data will allow us to track compliance with these voluntary recommendations.

Thanking you for your consideration of these comments on behalf of the member agencies of the Pacific States/BC Oil Spill Task Force, I remain,

Sincerely yours,

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cc: CAPT Rob Lorigan, Chief, Marine Safety Division, USCG Pacific Area Command

**Alaska British Columbia California Hawaii Oregon Washington**