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ORIGINAL

March 22, 1999

Docket Management Facility
U.S. Department of Transportation
Room PL-40 1
400 Seventh Street SW
Washington, D.C. 20590-0001

Dear Sir or Madam:

RE: Notice of Advance Rulemaking USCG-1999-4974-6

Thank you for providing the opportunity to review the referenced notice. In response to questions posed on page 3 146 of Federal Register Volume 64, No. 12, we provide the following comments.

Question 1 -- The following describes navigational hazards faced by vessels at various locations throughout the study area.

- At the entrance to the Strait of Juan de Fuca vessels face numerous hazards associated with making landfall after a long ocean voyage on an unforgiving shore with sometimes difficult environmental conditions and diverse vessel traffic. Propulsion and steering problems are commonly encountered as vessels shift to lighter fuel, change engine speed, test steering, etc. Often these pre-arrival tests and procedures are done as the ship is making landfall (about 12 miles offshore), leaving little room to maneuver or drift if problems are encountered. The primary obstruction in the area, Duntze Rock, is only two miles south of the inbound traffic lane. The entrance to the Strait has more days of poor visibility than most areas; seastate can be severe, particularly in the winter; and just west of Cape Flattery a strong inshore current will push a drifting vessel rapidly north across the outbound traffic lanes toward the rocky coast of Vancouver Island. Vessel traffic in and around the entrance to the Strait is very diverse, with deep sea traffic moving at a variety of speeds between 10 and 25 knots. Coastal traffic has a similar range in speeds. There is also tug and barge traffic, military traffic, and fishing near the entrance.

- In the western half of the Straits, the primary navigational hazard is small vessel traffic that is not under VTS control or following the traffic scheme. Overtaking situations occur frequently due to the variety of vessel speeds mentioned earlier. Environmental conditions are less severe and currents flow in and out of the Strait. Consequently, drifting vessels tend to

move in and out rather than toward the shore. Notable exceptions are vessels with very high freeboard such as car carriers and cruise ships, which will almost always drift downwind if the wind speed exceeds 20 knots. Much has been made of the dogleg in the traffic lanes between Pillar Point and Low Point, as vessels have missed the turn. Addition of a VTS call-in point has partially, but not completely, mitigated this situation.

- The eastern half of the Strait is a somewhat bewildering maze of intersecting traffic lanes. Fortunately, vessels pick up their pilots at Port Angeles and Victoria to help them safely transit this area. Traffic is very heavy and even more diverse than it is near the entrance to the Strait. Currents are very strong in this area and just outside the traffic lanes in many areas lie obstructions in the form of shoals and rocks.

- The principal navigational hazards in Rosario Strait are a powered grounding by a vessel that makes a navigational error or loses steering, and a drift grounding by a vessel losing propulsion. Obstructions located directly adjacent to the traffic lanes leave little or no room for error. Traffic is currently not too heavy. However, due to the risk associated with this narrow passage, the Coast Guard has implemented movement restrictions on tankers bound for Washington's four big refineries.

- The grounding hazards in Haro Strait are similar to those in Rosario Strait, and are accompanied by addition collision hazards. Traffic is much heavier as virtually all Canada-bound vessels entering through the Strait of Juan de Fuca transit Haro Strait. Despite the heavier traffic, there is no mandatory management of tankers or any other types of vessel. Concern has recently increased as several vessels have lost propulsion near the north end of Haro Strait and drifted very close to the rocky shores of the pristine San Juan Islands.

Question 2 -- The current system is stressed by high traffic density and differences in U.S.-Canadian traffic management practices. Although vessel transits are down this year due to the Pacific Rim economic crisis, we expect a dramatic increase by 2020.

Question 3 -- Modifications to the existing system would help address some of the concerns listed above. The port access route study should address:

- Regulatory: Make the CVTS and Olympic Coast NMS Area To Be Avoided mandatory. Negotiate mandatory traffic management procedures with the Canadian Coast Guard to ensure the presence of equivalent systems in Haro Strait and Rosario Strait. In Haro Strait, enforce U.S. or equivalent tanker escort laws and consider establishing a traffic separation scheme. Formally recognize offshore VTS to coincide with VTS Tofino radar coverage.

- TSS Design: Move the convergence zone further offshore of the entrance to the Strait of Juan de Fuca per the States/BC Oil Spill Task Force recommendations for coastal traffic management. Designate inshore traffic zones or auxiliary traffic lanes (like Thimble Shoals in Hampton Roads) for slow moving and small vessel traffic. Modify the Precautionary Area at

Port Angeles/Victoria, reducing the number of turns and simplifying pilot pick-up on the U.S. side. Formally designate anchorage areas and holding areas for pilot pick-up.

Question 4 -- The cost of implementing the above changes would be overshadowed by the associated benefits, which could be very substantial. The procedural simplicity of regulation suggests that option would be the least costly of the two to implement. However, changing the TSS design would likely produce the greatest reduction in casualty risk, and permit realization of secondary savings through reduced enforcement costs. It would be appropriate to pursue both these options concurrently, the former to speedily address emergent situations that need to be mitigated immediately, the latter to correct systemic deficiencies that will lower the long term risk potential from power groundings, drift groundings, and collisions.

Question 5 -- Recommended changes will increase programmatic costs initially, and cause short-term perturbations as the regulated community acclimates to the modified system. However, over the long term, stakeholders and surrounding Puget Sound communities will realize even larger benefits from reduced casualty incidence.

Thank you for this opportunity to participate. Please provide us with written notification if there are any further opportunities for public comment.

Sincerely,

"Joe Stohr
Program Manager
Spill Prevention, Preparedness, and Response Program

cc: CAPT Scott Davis, CCGD 13(m)
CDR Tim Close, USCG HQ(G-MSE)
Jean Cameron, States/B.C. Oil Spill Task Force