

Harbor Safety Committee

of the San Francisco Bay Region

*Mandated by the California Oil Spill
Prevention and Response Act of 1990*

Harbor Safety Committee of the San Francisco Bay Region

Thursday, April 10, 2014

U.S. Army Corps of Engineers, Bay Model Visitor Center, 2100 Bridgeway, Sausalito, CA

Capt. Lynn Korwatch (M), Marine Exchange of the San Francisco Bay Region (Marine Exchange), Chair of the Harbor Safety Committee (HSC); called the meeting to order at 10:05.

Alan Steinbrugge (A), Marine Exchange, confirmed the presence of a quorum of the HSC.

Committee members (M) and alternates (A) in attendance with a vote: **Capt. Esam Amso** (M), Valero Marketing and Supply Co.; **Jim Anderson** (M), CA Dungeness Crab Task Force; **Capt. Atanas Atanasov** (A), National Cargo Bureau; **Lt.Col. John Baker** (M), US Army Corps of Engineers; **John Berge** (M), Pacific Maritime Shipping Association; **Aaron Golbus** (M), Port of San Francisco; **Capt. Bruce Horton** (M), San Francisco Bar Pilots; **Capt. Jim Marshall** (M), Chevron Shipping Company; **Jim McGrath** (M), Bay Conservation and Development Commission; **Capt. Jonathan Mendes** (M), Starlight Marine Services; **Bill Needham** (A), National Boating Federation; **Capt. Ray Shipway** (M), International Organization of Masters, Mates & Pilots; **Capt. Greg Stump** (M), United States Coast Guard; **Gerry Wheaton** (M), NOAA; **Michael Williams** (M), Port of Richmond.

The meetings are always open to the public.

Approval of the Minutes-

A motion to accept the minutes of the March 13, 2014 meeting was made and seconded. The minutes were approved with the following correction:

- Jessica Burton Evans advised that the minutes be amended to reflect that although the Pinole Shoal Channel requires less dredging to maintain depth this year specifically, that is not necessarily the case in any other year.

Comments by Chair- Capt. Lynn Korwatch

Welcomed the committee members and audience. Thanked the Army Corps for hosting this month's meeting at the Bay Model Visitor Center.

Harbor Safety Committee

of the San Francisco Bay Region

*Mandated by the California Oil Spill
Prevention and Response Act of 1990*

Coast Guard Report- Capt. Gregory Stump

- Advised of the one year anniversary of his change of command and expressed his appreciation for the region and local maritime community.
- Announced that the USCG hosted the 2014 Facility Safety and Security Day on April 3, 2014 at CGI. Capt. Drew Tucci spoke about issues relating to cyber security. The DHS website has more information regarding this issue.
- Advised that there were 5 LOP cases in March with 3 attributed to fuel switching highlighting the importance of planning for these incidents.
- Advised of a March 31 incident in which a cruise ship broke away from the pier it was moored to as the result of high winds. No injuries were reported and tugs were available to assist rapidly.
- Announced that Cmdr. Tama and Lcdr. Wirts participated in an eNavigation Conference on April 3, 2014 at Cal. Maritime. The Bay Area is being used by the Coast Guard as a testing ground for eATON.
- Advised of MSIB 14-01 notifying of eATON deployment in the Bay Area (attached).
- Advised of MSIB 14-02 notifying of the SF HSC's Best Maritime Practice for Emergency Offshore Towing (attached).
- Advised that Opening Day on the Bay is April 27, 2014.
- Lcdr. Wirts read from the March-14 Prevention/Response Report (attached).
- Capt. Korwatch asked for the Coast Guard's definition of Public Vessels. Lcdr. Wirts advised that US government vessels from federal, state and local agencies are considered Public Vessels.
- Jim Anderson asked if faulty equipment was to blame for the March 31 vessel breakaway incident. Cmdr. Tama answered negative and advised that the incident was a freak event caused by extreme wind gusts. Peter Bonebackker asked if the Port of SF has assessed the moorings as a result of the bollard failure. Aaron Golbus advised that bollard tests have been performed and that the Port is studying the issue.

Army Corps of Engineers Report- Lt.Col. John Baker

- Welcomed the committee to the Bay Model Visitor Center and advised that the facility was a Liberty ship factory during WWII.
- Introduced Marty Plish, US Army Corps Navigation Branch Chief overseeing the maritime sector.
- Rob Lawrence read from the US Army Corps of Engineers, San Francisco District Report (attached).
- Capt. Amso commented on Tesoro's reporting of loss of depth at Bulls Head and asked if a survey has been conducted. Jessica Burton Evans advised that a survey was conducted and dredging action is planned for August. This is a priority area where shoaling builds up routinely.

Harbor Safety Committee of the SF Bay Region

April 10, 2014

Page 2

Harbor Safety Committee

of the San Francisco Bay Region

*Mandated by the California Oil Spill
Prevention and Response Act of 1990*

Clearing House Report- Alan Steinbrugge (report attached)

OSPR Report- Jeff Cowan (report attached)

- Advised that he had recently returned from Oslo, Norway where he gave a presentation on low sulfur fuel oil. He will be giving a presentation on the same topic for the Transportation Resource Board at the National Academy of Sciences in DC.
- Advised that OSPR Administrator Tom Cullen was in attendance.

NOAA Report- Gerry Wheaton

- Advised that Darren Wright with NOAA's Center for Operational Oceanographic Products and Services (CO-OPS) has provided the following synopsis of products to be presented at the June HSC meeting:
 - San Francisco Operational Forecast Model of water levels, currents, salinity and water temperature, providing nowcasts and forecasts out to 48 hours.
 - Tidal Current Prediction Updates from a recent Current Survey in the SF region.
 - High Frequency Radar Currents Tool.
 - NOAA Current Predictions.
 - New Sensors in the San Francisco PORTS.
 - Visibility sensors at Martinez-Amorco Pier, Oakland Berth 38 and Pier 17.
 - Air Gap on Oakland Bay Bridge.

A training session will be held after the meeting. Gerry Wheaton requested that the June HSC meeting be extended one hour to accommodate the presentation and training. Alan Steinbrugge advised that he would look into room availability.

- Advised that NRT6 is working on the Anchorage 22/23 survey. The survey will be expedited at the request of Capt. Korwatch on behalf of the HSC. NOAA is also looking into ways of releasing the information early by PDF.
- Advised that the chart for Oakland Inner Harbor has been updated to 50 feet. The RNC's and ENC's for the Oakland Turning Basin have also been updated at the request of the Bar Pilots.
- Advised that he had recently attended a Navigation Response meeting in Philadelphia. The topic of eHydro was discussed. The intent of eHydro is that all NOAA districts submit their data to a common database where all federal surveys would be available as soon as possible.
- Introduced Roger Gass with the NWS who gave a presentation to the HSC on Tsunami Warnings via Wireless Emergency Alerts (WEA). The NWS is now able to activate WEA cell phones for the

Harbor Safety Committee

of the San Francisco Bay Region

*Mandated by the California Oil Spill
Prevention and Response Act of 1990*

most critical Tsunami Warnings in which no previous Tsunami Watch or Advisory is in effect.

These Tsunami Warnings are currently limited to major near-field sources but this capability is a first step toward enabling WEA activation for all Tsunami Warnings. Further software enhancements and testing are required. Only the first Tsunami Warning for the same event will activate WEA and messages are limited to 90 characters. WEA enabled devices receive messages within a FIPS-code warning area. NWS zones are currently not incorporated in WEA. More information is available on tsunami.gov and on the Wireless Emergency Alerts page of the NWS website.

- A question was asked regarding the time it takes for a Tsunami Warning to be issued after an earthquake such as the recent one in Chile. Roger Gass advised that Tsunamis originating from far away are often studied and discussed before Warnings are issued but that Warnings would be issued immediately for near-field events.
 - A question was asked regarding the cessation of NWS Warning Alert emails and if email notifications are currently available. Roger Gass advised that he would look into it. Gerry Wheaton stressed the importance of the eWarning system for mariners and advised that negative Tsunami Reports are just as important as positive Reports for those concerned. Roger Gass advised that he would bring these concerns to the NWS. Capt. Korwatch suggested that local Marine Exchanges could be helpful in distributing Warnings if requested.
 - Aaron Golbus asked if tsunami inundation maps have been updated since 2009. Roger Gass advised that the maps are in the process of being updated but that the NWS is not involved. Gerry Wheaton advised that the State of California would be releasing the updated tsunami inundation maps.
 - John Hummer with MARAD suggested that the NWS be involved in future drills such as a recent Alaska Shield exercise simulating a 9.2 earthquake in Anchorage, Alaska. Warnings and notifications are critical for both mariners and communities.
 - Laura Covery with Sate Lands advised that recent Tsunami Warnings have underestimated the size of tsunamis as actually experienced by ships in port at LA/LGB and close calls have occurred. Buoy readings don't always reflect the true effect. The Los Angeles region recently updated their Dispersal Plan and these issues are critical in that process. Gerry Wheaton suggested that this would be a good topic of discussion for the California HSC Summit.
- Roger Gass read the weather report. He forecasted below normal precipitation ahead and advised that it was still too early to tell if an El Nino will form this year. Despite recent storms, snowpack is well below average and reservoirs are already depleted.

Harbor Safety Committee

of the San Francisco Bay Region

Mandated by the California Oil Spill Prevention and Response Act of 1990

State Lands Commission Report- Chris Beckwith (report attached)

- Announced that the Cal. State Lands Commission is hosting the Prevention First 2014 Pollution Prevention Symposium on October 7-8, 2014 in Long Beach. Information and registration available at www.slc.ca.gov.
- Introduced Laura Covery, Division Chief with the Cal. State Lands Commission. Laura Covery advised that she took over as Division Chief for the Marine Facilities Division in January. Former experience includes sailing, tanker operations, teacher at CMA and CA Port Captain for BP Shipping. She has had many roles with the Southern California HSC.

Hull Fouling and Ballast Water Presentation- Chris Scianni & Nicole Dobroski, State Lands Commission

- Nicole Dobroski, Environmental Program Manager with the CA State Lands Commission Marine Invasive Species Program advised that goal of the Program was to eliminate the discharge of invasive species from vessels into California waters.
- The Program manages ballast water and bio-fouling on vessels greater than 300 GRT and is funded by arrival fees. Over 10,000 qualifying vessels arrive at CA ports each year.
- Current ballast water management activities include the implementation of performance standards, evaluation of treatment technologies and development of compliance assessment protocols. Bio-fouling management regulations are also being developed.
- Chris Scianni, Senior Environmental Scientist with the Marine Invasive Species Program, discussed issues involved with in-water hull cleaning of commercial ships. Ship hull bio-fouling occurs when crabs, barnacles and other marine life attach to vessel hulls and are transported to foreign environments. Drag and damage cause by bio-fouling also negatively impact vessels directly. A study suggests that 120 billion dollars in damage is caused by invasive species in the United States each year.
- Regulations are being developed to address this issue that incorporate both proactive and reactive management focusing solely on commercial vessels.
- In-water hull cleaning using scrubbers can introduce alien species into CA waters. In addition, copper and other heavy metals used as biocides to treat ship hulls can be released into the water during cleaning. The regulatory jurisdictions regarding hull cleaning are complicated and many agencies are involved. In Southern California, copper treated hulls are not allowed to be cleaned in port. This has led vessel operators to clean their hulls offshore which creates additional water and safety issues. In Northern California, improved in-water hull cleaning units are being used which collect cleaning debris, preventing alien species from being released into

Harbor Safety Committee

of the San Francisco Bay Region

*Mandated by the California Oil Spill
Prevention and Response Act of 1990*

the water. This technology is a template for the rest of the state in addition to better co-operation between agencies.

- A question was asked regarding the feasibility of robotic hull cleaning. Chris Scianni replied that some new technology being used is robotic but that many require dive operators.
- A question was asked regarding where ships in the Mothball Fleet are cleaned before removal. Aaron Golbus advised that many of the ships were cleaned at BAE.
- John Berge asked if other ports in the world are using debris filtering technology for in-water hull cleaning. Chris Scianni replied that they are and that filtering technology adoption is growing.

Work Group Reports-

Tug Work Group- Capt. Johnathan Mendes advised that the Tug Work Group had finalized the document recommending the SF HSC adopt Best Maritime Practices for Emergency Offshore Towing (attached). He thanked all involved and motioned for the committee to vote. Capt. Horton seconded the motion. Capt. Mendes stressed that the BMP is a live document designed to be updated.

Capt. Korwatch advised that she had received and disseminated correspondence from Amy Trainer, Executive Director of the Environmental Action Committee of West Marin, in support of the BMP and outlining the recommendations and concerns of her organization (attached).

The SF HSC voted on the issue and the Best Maritime Practices for Emergency Offshore Towing were adopted with one dissenting vote. Capt. Ray Shipway, labor representative, voted not to adopt the BMP. He advised that although he supported the work of Capt. Mendes and the Tug Work Group, the lack of consideration given to tug manning levels required he vote no. Capt. Korwatch noted Capt. Shipway's dissenting vote and stated her opinion that the issue of manning levels is important but not suitable for inclusion the BMP. Dave Massey with the Coast Guard advised that manning levels are being addressed on the national level.

Navigation Work Group- Capt. Bruce Horton advised that there was nothing to report.

Ferry Operations Work Group- Aaron Golbus advised he wanted to set up a Work Group meeting to discuss ferry operations at the SF Giants Ballpark in the near future. The Port of SF wants to add permanent buoys delineating a transit zone.

Dredge Issues Work Group- Capt. Esam Amso advised that the Dredge Issues Work Group will be following up on the Bulls Head dredging.

Harbor Safety Committee

of the San Francisco Bay Region

*Mandated by the California Oil Spill
Prevention and Response Act of 1990*

PORTS Work Group- Nothing to report.

Prevention through People Work Group- William Needham advised that there was nothing to report. John Berge advised that recreational vessel regulation is being considered by the state of CA requiring operator certificates (SB 941) and suggested the HSC look into the issue.

PORTS Report- Alan Steinbrugge

- Advised that the Bay Bridge air gap sensor installation is now scheduled to begin on May 1, 2014 but that this date is subject to change.
- Advised that the current meter mounted on Southampton Shoal Lighted Buoy #6 was removed for buoy maintenance. It will be reinstalled as soon as possible.

Public Comment-

- Brian Hooker with Congressman Garamendi's office announced that the Congressman will be a keynote speaker at the Bay Planning Coalition Conference on May 16, 2014.
- Catherine Hooper, speaking on behalf of the Maritime Commerce Advisory Committee, commented on the proposed Warriors project at SF Pier 30/32. She stressed the importance of retaining deep draft vessel berthing capability at the Pier and reported that the Warriors are amenable to the idea. A ferry landing at the Pier has been discussed and response vessels need a place to dock in the event of an emergency. Pier 30/32 could also serve as an overflow cruise ship berth. A Japanese tall ship will be docking at Pier 30/32 on May 2, 2014. Capt. Shipway advised that unions support keeping Pier 30/32 a maritime facility.
- In response to a question, Ray Lawrence with the Army Corps advised that a congressional bill requiring dykes to prevent salt water intrusion is responsible for the construction visible up river. This is drought related. Lcdr. Wirts advised that more information on this topic is available on the Army Corps Sacramento District website.
- Capt. Korwatch advised that the SF Marine Exchange Mayday Party will be held at 16:30 at McCormick & Kuleto's in San Francisco on May 8, 2014.
- John Hummer announced that MARAD will be opening up one of their ships to the public in Alameda on May 22, 2014.

Old Business- None

Harbor Safety Committee

of the San Francisco Bay Region

*Mandated by the California Oil Spill
Prevention and Response Act of 1990*

New Business-

- Capt. Stump and Cmdr. Tama presented a USCG Certificate of Merit to Capt. Mendes in recognition of his hard work and leadership as chair of the SF HSC Tug Work Group. Capt. Mendes thanked the USCG and HSC for their support. Capt. Korwatch thanked Capt. Mendes for his service and wished him the best of luck in the future.

Next Meeting-

1000-1200, May 8, 2014
Port of San Francisco, Pier 1 Conference Center
The Embarcadero, San Francisco, CA

Adjournment-

A motion to adjourn was made and seconded. The motion passed without dissent and the meeting adjourned at 11:56.

Respectfully submitted:



Capt. Lynn Korwatch

PREVENTION / RESPONSE - SAN FRANCISCO HARBOR SAFETY STATISTICS

March-14

PORT SAFETY CATEGORIES*

	2014	2013	3yr Avg**
1. Total Number of Port State Control Detentions for period:	0	0	0.58
SOLAS (0), STCW (0), MARPOL (0), ISM (0), ISPS (0)			
2. Total Number of COTP Orders for the period:	12	4	5.44
Navigation Safety (0), Port Safety & Security (12), ANOA (0)			
3. Marine Casualties (reportable CG 2692) within SF Bay: Allision (0), Collision (0), Fire (1), Capsize (0), Grounding (1), Sinking (0), Steering (0), Propulsion (15), Personnel (0), Other (3), Power (0)	20	8	12.00
4. Total Number of (routine) Navigation Safety issues/Letters of Deviation: Radar (2) Gyro (1), Steering (0), Echo sounder (0), AIS (0), AIS-835 (0), ARPA (0), SPD LOG (0), R.C. (0), Other (0)	3	4	4.81
5. Reported or Verified "Rule 9" or other Navigational Rule Violations within SF Bay:	2	0	0.67
6. Significant Waterway events or Navigation related cases for the period	0	0	0.36
7. Maritime Safety Information Bulletins (MSIBs)	0	0	0.33
Total Port Safety (PS) Cases opened for the period:	37	16	24.19

MARINE POLLUTION RESPONSE

Source Identification (Discharges):

VESSELS	2014	2013	3yr Avg**
U.S. Commercial Vessels	1	0	0.94
Foreign Freight Vessels	0	0	0.17
Public Vessels	1	2	0.94
Commercial Fishing Vessels	1	0	0.42
Recreational Vessels	4	4	3.17
FACILITIES			
Regulated Waterfront Facilities	0	0	0.31
Regulated Waterfront Facilities - Fuel Transfer	0	0	0.11
Other Land Sources	1	3	1.47
Mystery Spills - Unknown Sources	6	4	4.22
Number of Oil/Hazmat Pollution Incidents within San Francisco Bay for Period			
1. Spills < 10 gallons	7	11	6.36
2. Spills 10 - 100 gallons (No discharges over 42 gallons)	1	2	0.86
3. Spills 100 - 1000 gallons	0	0	0.14
4. Spills > 1000 gallons	0	0	0.06
5. Spills - Unknown	6	0	4.08
Total:	14	13	11.28

TOTAL OIL DISCHARGE AND HAZARDOUS MATERIALS RELEASE VOLUMES BY SPILL SIZE CATEGORY:

1. Estimated spill amount from U.S. Commercial Vessels:	1	0	17.20
2. Estimated spill amount from Foreign Freight Vessels:	0	0	0.11
2. Estimated spill amount from Public Vessels:	5	2	6.03
3. Estimated spill amount from Commercial Fishing Vessels:	1	0	27.13
4. Estimated spill amount from Recreational Vessels:	16	4	9.63
5. Estimated spill amount from Regulated Waterfront Facilities:	0	0	4.82
6. Estimated spill amount from Regulated Waterfront Facilities - Fuel Transfer:	0	0	0.14
7. Estimated spill amount from Other Land Sources:	15	26	107.74
8. Estimated spill amount from Unknown sources:	6	3	6.04

TOTAL OIL DISCHARGE AND/OR HAZARDOUS MATERIAL RELEASE VOLUMES (GALLONS):

Total:	44	35	178.85
Civil Penalty Cases for Period	1	0	0.08
Notice of Violations (TKs)	0	0	0.47
Letters of Warning	3	2	1.78
TOTAL PENALTY ACTIONS:	4	2	10.81

* NOTE: Values represent all cases within the HSC jurisdiction during the period. Significant cases are detailed in the narrative.

** NOTE: Values represent an average month over a 36 month period for the specified category of information.

SIGNIFICANT PORT SAFETY AND SECURITY CASES (March 2014)

MARINE CASUALTIES

Structural Failure (07MAR): A U.S. flag tank barge discovered a crack in their #3 cargo tank, causing product to leak into the adjacent ballast tank. No pollution entered the water. The Coast Guard issued a No-Sail 835. The crack was repaired, and then Class and Coast Guard attended to witness those repairs. The vessel was released. Case pends.

Equipment Failure & Loss of Propulsion (08MAR): A foreign flag tank vessel was transiting up bound in the San Joaquin River, when the vessel's rudder angle indicator failed due to a loose wire connection. The vessel anchored and the crew conducted repairs. When the vessel prepared to get underway, the main engine failed to start due to a fractured pipe in the start air system. The crew repaired the pipe. A COTP order was issued requiring the vessel to return to Anchorage 9 with a two tug escort. Class and Coast Guard attended the vessel and witnessed satisfactory operation of the main engine. LOP was not attributed to fuel switching. Case pends.

Structural Failure (13MAR): A foreign flag bulk freight vessel discovered a crack between their port diesel oil tank and a ballast water tank. The crew suspected contamination in the ballast tank, but no pollution entered the water. A COTP order was issued requiring the vessel to submit a remediation plan. An independent surveyor sampled and tested the ballast water, and the results indicated 0 PPM of contamination. The vessel was ordered to follow standard U.S. ballast water discharge requirements and guidance from the vessel's flag state. Case pends.

Reduction in Propulsion (15MAR): A foreign flag bulk freight vessel was transiting from Redwood City to Anchorage 9, when the crew heard an unusual noise on the main engine. The incident was caused by a cracked cylinder liner. The crew replaced the cylinder liner, piston, piston skirt and o-rings. Class attended the vessel and witnessed satisfactory operation of the main propulsion system. LOP was not attributed to fuel switching. Case closed.

Loss of Propulsion (18MAR): A foreign flag bulk freight vessel experienced a loss of propulsion while approaching Anchorage 9. The main engine failed to respond to an astern bell due to improper fuel rack settings for MGO. The crew adjusted the settings IAW the manufacturer's instructions. Class and Coast Guard attended the vessel and witnessed satisfactory operation of the main engine. LOP was attributed to fuel switching. Case pends.

Reduction in Propulsion (20MAR): A U.S. flag tank vessel experienced a reduction in propulsion while transiting outbound in the Main Ship Channel. The incident was caused by seizing of the #2 fuel oil pump. The vessel returned to Anchorage 9 with a one tug escort, and the crew conducted repairs. Class attended the vessel and witnessed satisfactory operation of the main propulsion system. LOP was not attributed to fuel switching. Case pends.

Reduction in Propulsion (22MAR):** A foreign flag cruise vessel experienced a reduction in propulsion while enroute to San Francisco. The incident was caused by a loose wire connection on the transformer temperature sensor. The crew tightened the connections. Two tugs escorted the vessel in and out of port. Class attended the vessel and witnessed satisfactory operation of the main engine. LOP was not attributed to fuel switching. Case pends.

Fire (22MAR): A U.S. flag small passenger vessel was underway in San Francisco Bay with 70 passengers on board, when they reported a fire. The lagging on the port engine exhaust was smoldering, and the Captain shut that engine down. No fire extinguishers were used. Coast Guard small boats escorted the vessel safely to the pier. Case pends.

Loss of Propulsion (27MAR): A foreign flag tank vessel experienced a loss of propulsion while mooring in Martinez. The main engine failed to respond to an astern bell due to improper settings on the governor actuator motor. An engine technician attended the vessel and made adjustments to the governor. Class and Coast Guard attended the vessel and witnessed proper operation of the main engine. LOP was attributed to fuel switching. Case pends.

Structural Failure (27MAR): A U.S. flag ferry identified a section of missing hull plating while the vessel was moored at the dock. The Coast Guard issued a No-Sail 835 and the vessel was removed from service. Case pends.

Loss of Propulsion (28MAR): A foreign flag container vessel experienced a loss of propulsion while inbound and entering the Oakland Channel. The vessel anchored at the entrance to the channel. The vessel regained propulsion 30 minutes later and proceeded to Anchorage 8 under a 2 tug escort. The incident was caused by a clogged fuel meter. The crew disassembled and cleaned the fuel meter. Class and Coast Guard attended the vessel and witnessed satisfactory operation of the main propulsion system. LOP was attributed to fuel switching. Case pends.

Loss of Propulsion (29MAR): A foreign flag container vessel experienced a loss of propulsion while approaching the offshore precautionary area. The main engine failed to respond to an astern bell due to improper governor settings for MGO. A COTP order was issued requiring a two tug escort from Mile Rock to Anchorage 9. The crew tried to change the governor settings, but the password for the computer controlled system was not available. The vessel requested a waiver from CARB requirements and shifted to LSFO. Class and Coast Guard attended and witnessed proper operation of the main engine on LSFO. The COTP order was amended for an outbound transit with a one tug escort.

**Initial incident occurred outside of HSC jurisdiction

LOP was attributed to fuel switching. Case pends.

Grounding (29MAR): A foreign flag bulk carrier grounded in Stockton while the crew was using the mooring lines to shift the vessel to position for loading. A COTP order was issued requiring a dive survey. The survey was conducted at Anchorage 9, and no damage was found. Case pends.

VESSEL SAFETY CONDITIONS

Vessel Breakaway (31MAR): A foreign flag cruise ship parted 4 of its aft mooring lines while docked in San Francisco due to high winds. The vessel's stern swung away from the pier and the ends of the gangways were dragged off of the pier, but there were no injuries. A barge was alongside bunkering, but the operation was immediately halted and there was no pollution. Three tugs quickly arrived to assist the vessel. A crane was ordered to lift the gangways back up, and once this was done, the vessel safely moored again. Case pends.

GENERAL SAFETY CASES

Dragging Anchor (01MAR): A foreign flag bulk freight vessel drug anchor multiple times while off loading cargo to a barge in Anchorage 9. Two tugs and a Pilot were dispatched to the vessel. A COTP order was issued requiring the vessel to cease offloading and submit a plan to the Coast Guard for approval. A plan was submitted and the vessel moved to shallower water in the southern portion of Anchorage 9 and re-anchored. The COTP order was lifted and the vessel began offloading again. Case pends.

Reported Illegal Charter (11MAR): The Coast Guard received a report of an alleged illegal chartering operation. A Coast Guard small boat responded and completed a boarding. There were 13 people on board the vessel, they all knew each other; and there were no indications that the vessel was operating commercially. Case Closed.

Crew medical condition (21MAR): A crewmember on board a foreign flag container vessel began having severe abdominal pain. The vessel was not scheduled to stop in San Francisco, but requested and was granted a waiver from Notice of Arrival requirements. The vessel anchored in Anchorage 7 and sent the crew member ashore. Case closed.

Suspicious Package (29MAR): A U.S. flag ferry vessel discovered a suspicious package onboard while enroute to San Francisco. The vessel safely moored and offloaded all passengers. The Coast Guard established a 1,000 yard safety zone. The SFPD Bomb squad went onboard and determined the package was non-explosive. Case pends.

Rule 9 Violation (29MAR): A foreign flag bulk carrier reported that a 45ft sailing vessel cut across their bow during a turn in the Suisun Bay channel. The sailing vessel could not be identified for further investigation. Case closed.

Rule 9 Violation (30MAR): A U.S. flag towing vessel reported that numerous small sailing vessels crossed close in front of their bow while transiting in the Richmond channel. The towing vessel had to alter course. Case pends.

NAVIGATIONAL SAFETY

Letter of Deviation (LOD), Inop S-Band Radar (14MAR): Vsl issued an inbound LOD.

Letter of Deviation (LOD), Inop S-Band Radar (20MAR): Vsl issued an inbound LOD.

Letter of Deviation (LOD), Inop Gyrocompass (31MAR): Vsl issued an inbound LOD

SIGNIFICANT INCIDENT MANAGEMENT DIVISION CASES

On 06 March 2014, an USCG member witnessed a vessel he was inspecting discharge approximately 2 gallons of hydraulic fluid into the water. Due to this being the vessel's second discharge within a year, the owner of the vessel was issued a Civil Penalty.



**MARINE SAFETY AND SECURITY
INFORMATION BULLETIN
(MSIB) 14-01**



03 April, 2014

U.S. Department of Homeland Security, Coast Guard Sector San Francisco

Electronic Aids to Navigation

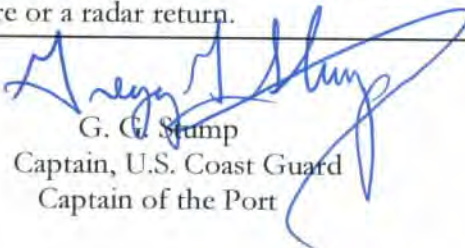
This bulletin notifies mariners that the U.S. Coast Guard has deployed electronic aids to navigation (eATON) to augment existing aids or features in the San Francisco Bay Area. Currently, Automatic Identification System ATON broadcasts are being used to mark the SF Buoy, Harding Rock Lighted Buoy, Mile Rocks Light, the offshore VTS reporting points and the A, B, C, D, and E towers of the San Francisco/Oakland Bay Bridge.

These eATON will be charted on NOAA charts as either special marks, safe water marks or as supplemental information to their associated physical buoy or light. The AIS AtoN broadcasts will also be heard (AIS Message 21, see http://www.navcen.uscg.gov/pdf/AIS/ITU-R_M1371-3_AIS_Msg_21.pdf) by all existing AIS device, but, will require an external process or system to be seen; their portrayal will likely differ by manufacturer. In accordance with current international standards (i.e., IEC 62288 (Ed. 1), IHO S-4 (Ed.4.4.0), AIS ATON should be portrayed electronic navigation equipment as diamond with centered cross-hairs or as a magenta circle labeled V-AIS on a nautical chart. Such as:



Manufacturers and software developers are encouraged to update their systems to portray these new AtoNs. Mariners capable of receiving and displaying them are encouraged to provide feedback regarding their usefulness and report any anomalies to the USCG NAVCEN website at www.navcen.uscg.gov via the Contact Us Tab | Subject: AIS | Category: AIS Testing. For other concerns and information, please contact the San Francisco Vessel Traffic Service or LCDR Amy Wirts at Amy.E.Wirts@uscg.mil. For additional information on AIS, the various types of AIS Aids to Navigation and future portrayal standards visit www.navcen.uscg.gov.

As with any AtoN, mariners should not depend solely on them to navigate safely. Additionally, mariners should exercise caution in the vicinity of an AIS AtoN, particularly those not associated with a physical AtoN (i.e. offshore TSS reporting points), because its portrayal could superimpose itself upon an other electronic nautical chart feature or a radar return.


G. G. Stump
Captain, U.S. Coast Guard
Captain of the Port



**MARINE SAFETY AND SECURITY
INFORMATION BULLETIN
(MSIB) 14-02**



April 10, 2014

U.S. Department of Homeland Security, Coast Guard Sector San Francisco

Emergency Offshore Towing

This bulletin promulgates the San Francisco Bay Harbor Safety Committee's Best Maritime Practice (BMP) for Emergency Offshore Towing (enclosure 1). The Emergency Offshore Towing BMP provides guidance for proper planning and execution of offshore emergency towing operations which may affect the San Francisco Bay Area. Tug companies and vessel owners/operators are encouraged to review the BMP to assist with preparing response plans and to ensure appropriate implementation of such plans during an emergency situation. For additional information, please contact the Sector San Francisco Waterways Safety Branch at (415) 399-7443.

A handwritten signature in blue ink, appearing to read "Gregory Stump".

G. G. STUMP
Captain, U.S. Coast Guard
Captain of the Port San Francisco

Enclosure: (1) Harbor Safety Committee Best Maritime Practice for Emergency Offshore Towing

**Harbor Safety Committee
Of the San Francisco Bay Region**

**Report of the
U.S. Army Corps of Engineers, San Francisco District
April 10, 2014**

1. CORPS O&M DREDGING PROGRAM

The following is this year's O & M dredging program for San Francisco Bay. The FY14 O&M dredging program is subject to change, pending the availability of funds.

- a. **FY14 Main Ship Channel** – Contract Hopper, planned start mid-May 2014 .
- b. **FY14 Richmond Inner Harbor** – Contract clamshell, planned start early-October 2014.
- c. **FY14 Richmond Outer Harbor (and Richmond Long Wharf)** – Government Hopper, planned start late-June 2014.
- d. **FY14 Pinole Shoal** – Government Hopper, planned start early-July 2014.
- e. **FY14 Suisun Bay Channel (and New York Slough)** - Government Hopper, planned start early-August 2014.
- f. **FY14 Oakland O & M Dredging-** Contract clamshell, planned start early-August 2014.
- g. **FY14 Redwood City Harbor-** Contract clamshell, planned start early October 2014.

2. DEBRIS REMOVAL – Debris removal for March 2014 was 11 tons. (Raccoon: 0 tons (in shipyard); Dillard: 8.5 tons; and Safe Boats: 2.5 tons). Average for March from 2004 to 2013 is 90.5 tons. (Range: 16 – 231 tons).

BASEYARD DEBRIS COLLECTION TOTALS:

MONTH	RACCOON	DILLARD	MISC	TOTAL
2013	TONS	TONS	TONS	TONS
JAN	0	35	0	35
FEB	0	6	25	31
MAR	0	8.5	2.5	11
APR				
MAY				
JUN				
JUL				
AUG				
SEP				
OCT				
NOV				
DEC				

YR TOTAL
77

3. UNDERWAY OR UPCOMING HARBOR IMPROVEMENTS

None to report.

4. EMERGENCY (URGENT & COMPELLING) DREDGING

No urgent dredging so far in 2014.

5. OTHER WORK

San Francisco Bay to Stockton - This project received \$800,000 in the FY 14 work plan.

Sacramento River Deep Water Ship Channel Deepening – The project received no funding in the FY 14 work plan. The study is on hold.

HYDROGRAPHIC SURVEY UPDATE

Address of Corps' web site for completed hydrographic surveys:

http://www.spn.usace.army.mil/Missions/Surveys_StudiesStrategy/HydroSurvey.aspx

Alameda Point Navigation Chanel: Condition survey of Sept. 2012 was posted on Sept 26.

Berkeley Marina (Entrance Channel): January 7, 2013 condition survey posted 1/9/13.

Bull's Head Shoal: February 15, 2013 condition survey posted Feb. 15, 2013.

Islais Creek Channel: December 12-13, 2012 condition survey posted 12/19/12.

Main Ship Channel: Condition survey of February 24 was posted.

Mare Island Strait: Condition survey of October 2012 was posted on October 4.

Marinship Channel (Richardson Bay): Condition survey of Dec.18; posted on Jan 24, 2012.

Napa River: Condition surveys of early- to mid-April were posted on May 1, 2012.

New York Slough: Condition survey of March 14-17, 2014 has been posted.

Northship Channel: November 20-26, 2012 condition survey posted 12/4/12.

Oakland Entrance Channel: Post-dredge surveys of Feb-Mar 2013 have been posted.

Oakland Inner Harbor: Condition survey completed March 20, 2014 has been posted.

Oakland Inner Harbor Turning Basin: Post-dredge surveys of Feb-Mar 2013 have been posted.

Oakland Outer Harbor: Condition survey completed March 24, 2014 has been posted.

Pinole Shoal Channel: Condition survey of Jan 24-29 has been posted.

Redwood City Harbor: Condition survey of late November has been posted.

Richmond Inner Harbor: Condition survey of 18-19 February was posted.

Richmond Outer Harbor (Longwharf): Condition survey of February 19 was posted.

Richmond Outer Harbor (Southampton Shoal): Condition survey of March 3 was posted.

San Bruno Shoal: Condition survey completed in June, 2011 has been posted.

San Leandro Marina (and Channel): Condition survey of April 30 – May 2 was posted on May 8.

San Rafael Across-the-Flats and San Rafael Creek: Condition surveys completed May 9 and 10 are posted.

Suisun Bay Channel: Condition survey of March 13-17, 2014 has been posted.

Disposal Site Condition Surveys:

SF-08 (Main Ship Channel Disposal Site): Survey of March 2013 has been posted.

SF-09 (Carquinez): Sept 9, condition survey has posted (Sept 9, 2013).

SF-10 (San Pablo Bay): Sept 9, condition survey has been posted (Sept 9, 2013).

SF-11 (Alcatraz): Priorities have delayed the survey until next week.

SF-16 (Suisun Bay Channel Disposal Site): Condition survey of May 17, 2012 was posted on May 25, 2012.

SF-17 (Ocean Beach Disposal Site): March 2013 survey has been posted.

O&M DREDGING PLAN FOR FY14

Project	2013			2014									FY15			Volume	Placement Site
	OCT FY14	NOV	DEC	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC		
Humboldt Bar&Entrance								Contract Hopper	█							1mcy	HOODS
SF Main Ship Channel								Contract Hopper	█							350kcy	SF-17
Richmond Inner Harbor	█	█								█	█	█	█	█	█	250kcy	SFDODS
Richmond Outer Harbor	█	█						ESSAYONS	█							250kcy	SF-11
Pinole Shoal	█	█						ESSAYONS	█							150kcy	SF-10
Suisun Bay Channel	█	█								YAQUINA	█					175kcy	SF-16
Oakland Inner Harbor	█	█	█	█	█	█						█	█	█	█	400kcy	upland
Oakland Outer Harbor	█	█	█	█	█	█						█	█	█	█	400kcy	upland
Redwood City Harbor	█	█								█	█	█	█	█	█	350kcy 200kcy*	SF-11 upland*
<div style="display: flex; justify-content: space-around; align-items: center;"> <div style="text-align: center;"> █ Complete & Ongoing Contracts </div> <div style="text-align: center;"> █ Hopper </div> <div style="text-align: center;"> ▨ New Dredge Contract </div> <div style="text-align: center;"> █ Environmental Window </div> </div>																	

* Pending Availability of Funds



Harbor Safety Committee of the
San Francisco Bay Region Clearing House
c/o Marine Exchange of the San Francisco Bay Region
505 Beach Street, Suite 300
San Francisco, California 94133-1131
415-441-6600 fax 415-441-3080 hsc@sfmtx.org

San Francisco Clearinghouse Report

April 10, 2014

- ✎ In March the clearinghouse reported 2 possible to escort violations to OSPR.
- ✎ In March the clearinghouse did not receive any notifications of vessels arriving at the Pilot Station without escort paperwork.
- ✎ The Clearinghouse has contacted OSPR 2 times regarding possible escort violations in 2014. The Clearinghouse called OSPR 1 time in 2013. The Clearinghouse called OSPR 3 times in 2012 regarding any possible escort violations, 3 times in 2011, 6 times in 2010, 8 time 2009; 4 times 2008; 9 times in 2007; 9 times in 2006; 16 times in 2005; 24 times in 2004; twice in 2003; twice in 2002; 6 times in 2001; 5 times in 2000.
- ✎ In March there were 90 tank vessel arrivals; 4 Chemical Tankers, 16 Chemical/Oil Tankers, 28 Crude Oil Tankers, 1 LPG, 17 Product Tankers, and 24 Tugs with Barges.
- ✎ In March there were 285 total arrivals.

San Francisco Bay Clearinghouse Report For March 2014

San Francisco Bay Region Totals

	<u>2014</u>		<u>2013</u>	
Tanker arrivals to San Francisco Bay	66		69	
Barge arrivals to San Francisco Bay	24		27	
Total Tanker and Barge Arrivals	90		96	
Tank ship movements & escorted barge movements	305		350	
Tank ship movements	146	47.87%	229	65.43%
Escorted tank ship movements	98	32.13%	94	26.86%
Unescorted tank ship movements	48	15.74%	135	38.57%
Tank barge movements	159	52.13%	121	34.57%
Escorted tank barge movements	38	12.46%	56	16.00%
Unescorted tank barge movements	121	39.67%	65	18.57%

Percentages above are percent of total tank ship movements & escorted barge movements for each item.

Escorts reported to OSPR 2 0

Movements by Zone	Zone 1	%	Zone 2	%	Zone 4	%	Zone 6	%	Total	%
Total movements	179		286		0		127		592	
Unescorted movements	87	48.60%	155	54.20%	0	0.00%	68	53.54%	310	52.36%
Tank ships	74	41.34%	119	41.61%	0	0.00%	46	36.22%	239	40.37%
Tank barges	13	7.26%	36	12.59%	0	0.00%	22	17.32%	71	11.99%
Escorted movements	92	51.40%	131	45.80%	0	0.00%	59	46.46%	282	47.64%
Tank ships	67	37.43%	97	33.92%	0	0.00%	40	31.50%	204	34.46%
Tank barges	25	13.97%	34	11.89%	0	0.00%	19	14.96%	78	13.18%

Notes:

1. Information is only noted for zones where escorts are required.
2. All percentages are percent of total movements for the zone.
3. Every movement is counted in each zone transited during the movement.
4. Total movements is the total of all unescorted movements and all escorted movements.

San Francisco Bay Clearinghouse Report For 2014

San Francisco Bay Region Totals

	<u>2013</u>		<u>2012</u>	
Tanker arrivals to San Francisco Bay	193		728	
Barge arrivals to San Francisco Bay	77		320	
Total Tanker and Barge Arrivals	270		1,048	
Tank ship movements & escorted barge movements	928		3,544	
Tank ship movements	451	48.60%	1,995	56.29%
Escorted tank ship movements	307	33.08%	1,160	32.73%
Unescorted tank ship movements	144	15.52%	835	23.56%
Tank barge movements	477	51.40%	1,549	43.71%
Escorted tank barge movements	128	13.79%	544	15.35%
Unescorted tank barge movements	349	37.61%	1,005	28.36%

Percentages above are percent of total tank ship movements & escorted barge movements for each item.

Escorts reported to OSPR 2 1

Movements by Zone	Zone 1	%	Zone 2	%	Zone 4	%	Zone 6	%	Total	%
Total movements	533		877		0		410		1,820	
Unescorted movements	240	45.03%	460	52.45%	0	0.00%	203	49.51%	903	49.62%
Tank ships	199	37.34%	342	39.00%	0	0.00%	139	33.90%	680	37.36%
Tank barges	41	7.69%	118	13.45%	0	0.00%	64	15.61%	223	12.25%
Escorted movements	293	54.97%	417	47.55%	0	0.00%	207	50.49%	917	50.38%
Tank ships	218	40.90%	303	34.55%	0	0.00%	133	32.44%	654	35.93%
Tank barges	75	14.07%	114	13.00%	0	0.00%	74	18.05%	263	14.45%

Notes:

- Information is only noted for zones where escorts are required.
- All percentages are percent of total movements for the zone.
- Every movement is counted in each zone transited during the movement.
- Total movements is the total of all unescorted movements and all escorted movements.

OSPR Regulations/Legislative Report
(As of April 4, 2014)

REGULATIONS:

Workshops Discussing Potential Changes to the Contingency Plan Regulations Regarding Spill Management Teams

Beginning in January 2013, the Office of Spill Prevention and Response (OSPR) began conducting unannounced plan holder exercises specifically focusing on Spill Management Teams' (SMT) ability to staff an organizational structure of appropriate size for a Type III spill response. Two Workshops were held to discuss the results of these drills, and potential changes to the Contingency Plan regulations regarding SMTs. **OSPR is convening an industry workgroup in May to work on performance standards for SMTs, to be included in regulations governing contingency plans.**

Potential Changes to the Certificate of Financial Responsibility (COFR) Regulations

OSPR is amending the regulations governing COFRs. Most of the changes are either clarifications of existing requirements, or changes to aid in-house processing. The draft language will be sent out to industry for an informal comment period later in April.

To be added to mailing list for updates on Workshops **or potential regulations changes** please contact Joy Lavin-Jones.

Email: Joy.Lavin-Jones@wildlife.ca.gov

Phone: 916-327-0910.

LEGISLATION:

AB 881 (Chesbro):

Existing law imposes an Oil Spill Prevention and Administration Fee in an amount not to exceed \$0.065 per barrel of crude oil or petroleum products, until January 1, 2015. This bill would, instead, on and after January 1, 2015, increase the maximum annual assessment to \$0.07 per barrel of crude oil or petroleum products. The bill would also allow the assessment to cover the annual costs incurred by the Oiled Wildlife Care Network.

The bill was moved to the "inactive file" at the end of this legislative session. Since this is the first year of the 2-year legislative cycle, the legislature actually has until the end of the next legislative year (9/14) to act on this bill.

SB 987 (Monning):

Existing law establishes the California Sea Otter Fund and allows taxpayers to designate on their tax returns that a specified amount in excess of their tax liability be transferred to the fund. Existing law requires a specified portion of money in that fund, be allocated to the Department of Fish and Wildlife for the purposes of increased investigation, prevention, and enforcement actions. This bill would authorize the department to use money from the fund take to encourage taxpayers to make contributions on their tax returns to the California Sea Otter Fund and to disseminate information to the public about the status of California sea otters.

AB 2678 (Ridley-Thomas):

Existing law establishes the Oil Spill Technical Advisory Committee to provide public input and independent judgment of the actions of the administrator for oil spill response. The committee is composed of 10 members and the Governor is required to appoint as one of these members a person who has worked in state government. This bill would instead require the Governor to appoint a member who is a faculty member of the Karen C. Drayer Wildlife Health Center at UC Davis or the Director of the Oiled Wildlife Care Network.

SB 1319 (Pavley):

This bill would require the Oil Spill Technical Advisory Committee to monitor and evaluate the modes of transportation of oil into and within the state and the properties of oil to identify any necessary changes in OSPR's response and preparedness programs.

AB 2677 (Rodriguez):

Existing law establishes the Oil Spill Response Trust Fund in the State Treasury. Moneys in the fund are continuously appropriated to the administrator generally for the purposes of covering costs of response, containment, and cleanup of oil spills into marine waters.

This bill would prohibit the use of moneys in the fund for any purpose other than the oil spill response and cleanup activities authorized by the administrator pursuant to these provisions.

OSPR is tracking all of these bills, and has no position on the bills.

Governor's Budget Summary – 2014-15:

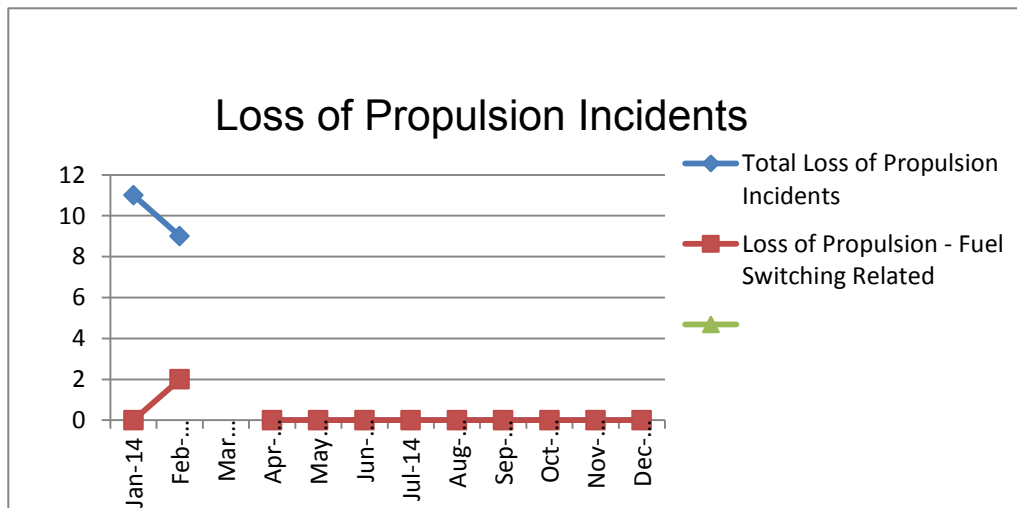
The following proposal was included in the Governors FY 2014-15 Budget, which will expand the existing oil spill program to address the increased risk of inland oil spills by supporting prevention, emergency response preparedness, cleanup, and enforcement measures:

“Oil Spill Response Program — \$6.7 million Oil Spill Prevention and Administration Fund and 38 positions to enhance the Department’s inland oil spill prevention, preparedness, and response capabilities. Rail shipments of oil, including North Dakota Bakken oil, are expected to significantly increase from 3 million barrels to approximately 150 million barrels per year by 2016. This type of oil is extremely flammable and its transport increases the risk of serious accidents, similar to the rail incident in Lac-Megantic, Quebec in July 2013. This proposal will expand the existing oil spill program to address the increased risk of inland oil spills by supporting prevention, emergency response preparedness, cleanup, and enforcement measures. The proposal also includes increased funding for the Oil Wildlife Care Network, which protects wildlife affected by marine oil spills. This additional funding will be supported by expanding the existing 6.5 cent per barrel fee, which is currently collected at marine ports, to all crude oil sent to refineries. This proposal is part of the Administration’s ongoing efforts to improve the safety of the extraction, transportation, processing, and use of fossil fuels in California.”

REPORTED LOSS OF PROPULSION INCIDENTS

Monthly Totals in 2014

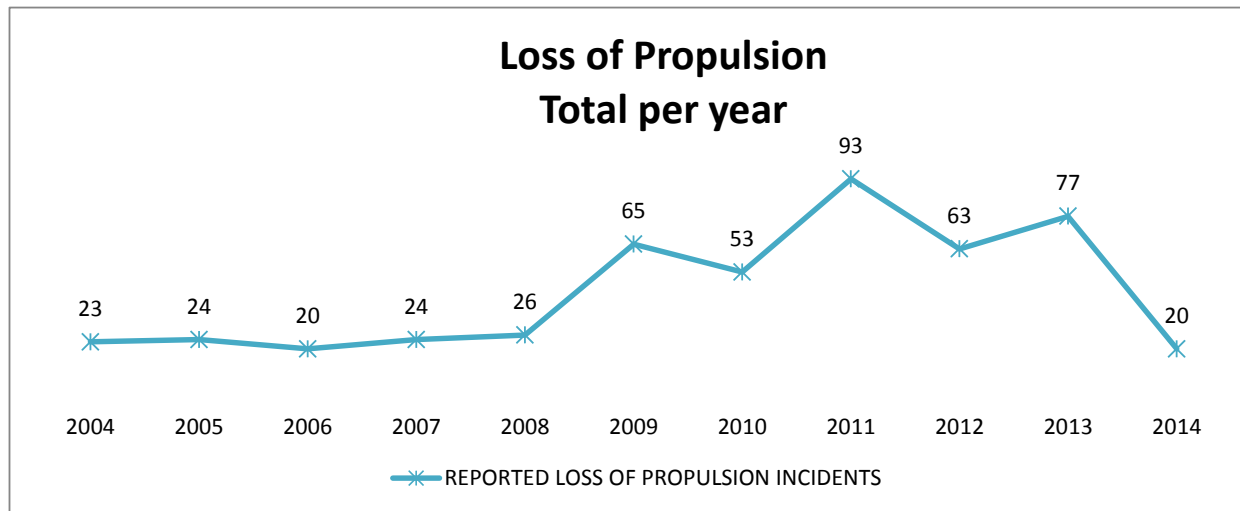
	Total Loss of Propulsion Incidents	Loss of Propulsion - Fuel Switching Related	
Jan-14	11	0	
Feb-14	9	2	
Mar-14			
Apr-14	0	0	
May-14	0	0	
Jun-14	0	0	
Jul-14	0	0	
Aug-14	0	0	
Sep-14	0	0	
Oct-14	0	0	
Nov-14	0	0	
Dec-14	0	0	
Totals	20	2	



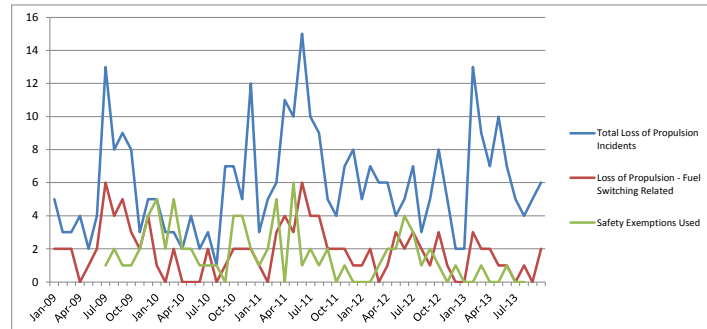
REPORTED LOSS OF PROPULSION INCIDENTS

2004 - 2014

	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014
San Francisco	15	11	10	10	12	37	26	54	37	39	8
Los Angeles / Long Beach	8	12	6	14	14	28	25	38	26	37	10
San Diego	0	1	3	0	0	0	2	1	0	1	2
Humboldt	0	0	1	0	0	0	0	0	0	0	0
Total per year	23	24	20	24	26	65	53	93	63	77	20



REPORTED LOSS OF PROPULSION INCIDENTS				
Monthly Totals in 2009 - 2014				
	Total Loss of Propulsion Incidents	Loss of Propulsion - Fuel Switching Related	Safety Exemptions Used	Problems Reported by Pilots
Jan-09	5	2		
Feb-09	3	2		
Mar-09	3	2		
Apr-09	4	0		
May-09	2	1		
Jun-09	4	2		
Jul-09	13	6	1	33
Aug-09	8	4	2	25
Sep-09	9	5	1	14
Oct-09	8	3	1	14
Nov-09	3	2	2	4
Dec-09	5	4	4	6
Jan-10	5	1	5	
Feb-10	3	0	2	
Mar-10	3	2	5	
Apr-10	2	0	2	
May-10	4	0	2	
Jun-10	2	0	1	
Jul-10	3	2	1	
Aug-10	1	0	1	
Sep-10	7	1	0	
Oct-10	7	2	4	
Nov-10	5	2	4	
Dec-10	12	2	2	
Jan-11	3	1	1	
Feb-11	5	0	2	
Mar-11	6	3	5	
Apr-11	11	4	0	
May-11	10	3	6	
Jun-11	15	6	1	
Jul-11	10	4	2	
Aug-11	9	4	1	
Sep-11	5	2	2	
Oct-11	4	2	0	
Nov-11	7	2	1	
Dec-11	8	1	0	
Jan-12	5	1	0	
Feb-12	7	2	0	
Mar-12	6	0	1	
Apr-12	6	1	2	
May-12	4	3	2	
Jun-12	5	2	4	
Jul-12	7	3	3	
Aug-12	3	2	1	
Sep-12	5	1	2	
Oct-12	8	3	1	
Nov-12	5	1	0	
Dec-12	2	0	1	
Jan-13	2	0	0	
Feb-13	13	3	0	
Mar-13	9	2	1	
Apr-13	7	2	0	
May-13	10	1	0	
Jun-13	7	1	1	
Jul-13	5	0	0	
Aug-13	4	1	0	
Sep-13	5	0	0	
Oct-13	6	2	0	
Nov-13	6	2	0	
Dec-13	3	0	0	
Jan-14	11	0	1	
Feb-14	9	2	1	
Mar-14	0	0	0	
Totals	374	112	82	96





CALIFORNIA STATE LANDS COMMISSION

HARBOR SAFETY COMMITTEE MONTHLY REPORT - MARCH COMPARISON

VESSEL TRANSFERS

	Total Transfers	Total Vessel Monitors	Total Transfer Percentage
MARCH 1 - 31, 2013	246	97	39.43
MARCH 1 - 31, 2014	229	102	44.54

CRUDE OIL / PRODUCT TOTALS

	Crude Oil (D)	Crude Oil (L)	Overall Product (D)	Overall Product (L)	GRAND TOTAL
MARCH 1 - 31, 2013	9,667,000	0	16,794,203	5,957,121	22,751,324
MARCH 1 - 31, 2014	13,054,463	0	17,392,313	8,148,018	25,540,331

OIL SPILL TOTAL

	Terminal	Vessel	Facility	Total	Gallons Spilled
MARCH 1 - 31, 2013	0	0	0	0	0
MARCH 1 - 31, 2014	0	0	0	0	0

*** Disclaimer:

Please understand that the data is provided to the California State Lands Commission from a variety of sources; the Commission cannot guarantee the validity of the data provided to it.

FROM: Chair; SF Bay Harbor Safety Committee; Tug Workgroup
SUBJECT: Recommended addition to Harbor Safety Plan addressing best practices for Tugs responding from San Francisco Bay to engage in Emergency Ship Towing
DATE: April 10, 2014

Background:

In January of 2013, USCG Sector San Francisco brought the issue of emergency ship tows before the San Francisco Harbor Safety Committee as part of their continued promotion of safe navigation within their Area of Responsibility (AOR). Sector San Francisco sought information on the capabilities and availability of tug assets in their AOR and more information on how to improve the likelihood of a positive response. The issue was given to the Tug Work Group which held numerous public meetings seeking input from all stakeholders. Initial discussions focused on the potential for a dedicated Emergency Towing Package (specialized gear for connecting a tug to a ship requiring assistance) positioned in the San Francisco area. The Tug WG concluded that such a package is not appropriate in this area, as the tug companies maintain adequate equipment for offshore towing. The companies were also concerned with the use of equipment that they did not maintain.

The Tug Work group, in conjunction with Sector San Francisco, held a live table top exercise to assess availability and response time based on actual vessel traffic and tug availability conditions. The table top drill identified at least eight tugs from various Bay Area companies with sufficient capabilities to respond and be on site within a few hours.

The results of the table top exercise and associated discussions led the WG to determine that a Best Maritime Practice for Emergency Offshore Towing is the most appropriate method to ensure readiness for response. The contents of the BMP are based on historical response times from San Francisco Bay, how the tug company was chosen, the equipment that was used, and the actual towing evolution that occurred. The foremost factor in response times was the urgency of the situation. The urgency of the situation dictated what tug company responded, allowable time to prepare for the tow, and the equipment needed to accomplish the tow. The resulting BMP document outlines the steps that the San Francisco Harbor Safety Committee, Vessel Owners/Operators, and Tug Operators should take to remain prepared for an emergency vessel tow within the Bay and off the California Coast.

Recommendations:

1. The Tug WG recommends that the HSC adopt the Best Maritime Practice – Emergency Offshore Towing (Encl 1) to provide guidance on the appropriate actions by vessel owners/operators and tug companies in response to an offshore emergency.
2. The Tug WG recommends that the Marine Exchange include capacity for coastwise towing in the San Francisco Tug Asset List in the Golden Gate Ports Handbook and on the San Francisco Marine Exchange web site in the Harbor Safety Committee pages, <http://www.sfmex.org/support/hsc/kipsratings/KIPSRatings.htm>. An example of the information to be provided and published is included within Enclosure 1.
3. The Tug WG recommends that the HSC request that the California Office of Spill Prevention and Response (OSPR) commission a study to validate the Emergency Tow Vessel Capability Matrix (Appendix C of Enclosure 1). The study should be specific to the environmental conditions and likely vessel traffic off the Northern California Coast.

BEST MARITIME PRACTICE- EMERGENCY OFFSHORE TOWING

TABLE OF CONTENTS

Section 1: Overview

Section 2: Geographic Scope

Section 3: General Guidelines / Community Responsibilities

Section 4: Vessel/Owner/Operator (RP) Responsibilities

Section 5: Tug Company Responsibilities

Section 6: Appendices

- Appendix A: Offshore Towing Risk Matrix
- Appendix B: SF Bay Tug List
- Appendix C: Emergency Tow Vessel Capability Matrix
- Appendix D: SOLAS regulation II-1/3-4
- Appendix E: Sample Emergency Tow Booklet (ETB)
- Appendix F: Communication Checklist
- Appendix G: Ship Rescue Requirement Checklist
- Appendix H: Tow Configuration Examples

1. OVERVIEW

The objective of this Best Maritime Practice is to set forth the Harbor Safety Committee's expectations regarding the planning and execution of emergency towing operations. This BMP provides guidance to ensure that the best towing assets with the most appropriate equipment and properly trained crews are deployed from San Francisco Bay for emergency towing. This BMP has been compiled so that the assigned tug(s) and vessel in distress have a common understanding of what is likely to occur in the event an emergency towing operation is necessary.

The following entities have a role in executing this Best Maritime Practice:

- 1) The San Francisco Harbor Safety Committee – With representatives from within the Maritime Industry, Regulators, Environmentalists, and the general public this organization has proven to be a valuable team to insure all stakeholder interests are represented.
- 2) Vessel Owners/Operators – The companies that operate the vessels that provide the resources to keep our economy moving.
- 3) San Francisco Bay Area-based Tug Companies – The companies that conduct various towing operations on San Francisco Bay and are capable of performing offshore Emergency Ship Towing.

2. GEOGRAPHIC SCOPE

The jurisdiction of the Harbor Safety Committee of the San Francisco Bay includes all of the inland Bay waters and extends to the "SF" buoy and the sea approaches to San Francisco Bay east of that point. This BMP is intended to protect the resources within the San Francisco Bay by ensuring that appropriate actions are taken to prevent a drift grounding along the CA coast and the consequent environmental damage which would ensue both to the coast and possibly to the Bay. The tenets of this BMP apply to emergencies within the Bay, and those outside of San Francisco Bay which may require the deployment

of the organic tug assets normally available in San Francisco Bay. The anchorages and dock spaces which may be the final destination for any vessel experiencing a loss of propulsion whether offshore or within the Bay are located within San Francisco Bay, as are many of the Potential Places of Refuge (PPOR). The decision on the final destination for an emergency tow will be made by a Unified Command, defined in Section 3 below.

3. GENERAL GUIDELINES / COMMUNITY RESPONSIBILITIES

EARLY NOTIFICATION

The USCG has developed a Homeport Alert Warning System for early notification to tug companies of potential offshore emergencies which may require the use of tugs. This early notification is for informational purposes only and allows the industry to begin to assess their equipment and crew capabilities and timelines for an organized potential response. The tug company can greatly reduce the risk to its crews and be more productive preparing the tug while it is in the harbor rather than having crews do the prep work on deck at sea. Once a company is selected by the Responsible Party, response time will be dependent on the urgency of the situation. All tug companies with interest in and capabilities of responding to Emergency Ship Towing situations offshore are encouraged to sign up for and enroll in the Home Port Alert Warning System which may be done by contacting the Coast Guard.

RESPONSE PRIORITY

The Harbor Safety Committee has established the following priority actions for emergency towing situations. Parties should consult closely with the Coast Guard to collaboratively establish specific priorities for each emergency towing incident:

- Triage – assess the situation and send appropriate assets to address the highest concern situation (eg, drift grounding)
- Stabilize – initially stabilize the drifting vessel and isolate it from immediate danger. If adequate assets are not initially available to begin a towing evolution, it may be necessary to send smaller / less powerful assets to temporarily stabilize and hold the vessel.
- Tow – once the highest risk situations have been avoided and the situation is stable, commence tow to gain full control of the situation.
- Identify Destination – Identify a destination for the towed vessel (if applicable). Should the situation warrant use of the PPOR process (as determined by the Coast Guard and/or appropriate Unified Command), begin vetting process for PPOR within the Bay. Note: the typical emergency ship towing scenario will not require use of the PPOR process.

For incidents which occur within the San Francisco Bay, available tug assets will be immediately dispatched to respond to the situation. Due to the traffic density within the Bay, most casualties which result in the need for such assistance occur where adequate tug assistance is immediately available. This BMP outlines the procedures and practices to ensure timely and appropriate response to incidents in the offshore environment.

The Typical Decision/Action Matrix for Emergency Offshore Towing (**Appendix A**) graphically depicts the risk-based priority for getting tugs underway and on scene outside of the Golden Gate. The Matrix is a tool designed to assist the Coast Guard, vessel operators and towing companies in determining the highest risk areas, and to inform vessel operators of potential actions and expectations of the Coast Guard given the distance offshore. The Matrix does not definitively dictate the boundaries between the areas of highest, medium and low risk, but rather is a tool to enhance risk assessment and decision making. Other factors such as prevailing weather, vessel traffic conditions, and vessel material condition also impact assessment of risk and associated response posture. The goal of any response should be to prevent a vessel from drifting into the highest risk (red) areas without the assistance of adequate tugs to stabilize and control the situation. When an incident occurs further off the coast, where the risk of the vessel drifting near shore is reduced, it is possible and prudent to spend more time preparing a response and tow plan.

Under normal circumstances, the Coast Guard will direct the RP to ensure that adequate tugs to control the situation are in place at the 12nm line. The matrix is designed to prompt action in such a manner as to ensure this safeguard is in place and actionable. The Coast Guard will typically require a minimum two tug escort for vessels entering San Francisco Bay following a loss of propulsion.

AVAILABLE TOW VESSELS AND RECOMMENDED TOWING EQUIPMENT

An inventory of towing vessels in the San Francisco Bay that may assist a vessel offshore can be found in (**Appendix B**). The inventory is also available on the San Francisco Marine Exchange web site in the Harbor Safety Committee pages, <http://www.sfmex.org/support/hsc/kipsratings/KIPSRatings.htm>. This list identifies tugs which may be available for dispatch to an offshore emergency. The list is for guidance and reference only, since at any given time an individual tug on the list may not be available for various reasons. Specific guidance regarding the appropriate equipment to be carried on a towing vessel is outlined in Section 5 below. The Ship Rescue Requirement Checklist template (**Appendix G**) is recommended to ensure that preparation is thorough.

EMERGENCY TOW VESSEL CAPABILITY MATRIX

Parties involved in dispatching a rescue tug should refer to the “Emergency Tow Vessel Capability Matrix” (**Appendix C**) in this document as a guide with the understanding that circumstances may warrant the need for additional resources. The matching of rescue tugs to a vessel depends on a multitude of variables. Multiple studies have been completed on this subject and there are many variables which determine a suitable matching of tug quantities and power. The Matrix in Appendix C was compiled by the West Coast Offshore Vessel Traffic Risk Management Project which was co-sponsored by the Pacific States/British Columbia Oil Spill Task Force and the US Coast Guard, Pacific Area. Information was evaluated from five studies from separate sources to develop this Matrix.

INCIDENT MANAGEMENT/UNIFIED COMMAND

The RP should refer to their applicable emergency response plans to determine their responsibilities and needs. For certain incidents, the Coast Guard may determine the need for a Coast Guard Unified

Command (UC) and Incident Command Post (ICP). In the event that either the Vessel Response Plan (VRP) indicates the stand-up of a UC or if the Coast Guard determines the need for a UC, the following personnel, at a minimum, should be represented and present within the ICP:

- USCG Federal On Scene Coordinator (USCG FOSC)
- State On Scene Coordinator (SOSC)
- Vessel Representative (RP)
- Applicable Towing Company representative
- Salvage Representative (as applicable under Salvage and Marine Fire Fighting Plan)

TOW DESTINATION

The vessel owner will work with Federal regulators (and in some cases State regulators and other stakeholders via Unified Command) to gain approval for the destination, taking into consideration the nature of the vessel's casualty and repair needs. The vessel operator, Pilots, or regulators may require additional tugs to be dispatched as the vessel approaches the San Francisco Bay and certain points within the Bay to ensure safe transit.

CONTINUAL IMPROVEMENT / EXERCISE FREQUENCY

The San Francisco Harbor Safety Committee is committed to partnering for the greater public trust of California shorelines and is committed to conducting drills and exercises to maintain proficiency and to improve best practices. These exercises will provide the Harbor Safety Committee with a sound feedback mechanism on the applicability of this best practice and will allow the best practice an efficient means for continual improvement.

- a. The Tug Work group will organize and execute periodic drilling of Emergency Towing Situations.
 - i. The Tug Workgroup should hold a table top exercise testing the incident response, incident management and response resources no less than twice in 3 years.
 - ii. The Tug Workgroup should also perform a field exercise involving an actual ship with the objective of testing tow gear, techniques and communication, and sharing lessons learned across the local maritime community, no less than once every 3 years.
 - iii. An actual Emergency Ship Tow may count towards drill credit if the towing company involved is willing to present to the Workgroup a review of the actual tow.

4. VESSEL/OWNER/OPERATOR (RP) RESPONSIBILITIES

GENERAL

This Best Maritime Practice is intended to assist owners/operators in preparing their ship for an emergency towing incident. Every Ship Master calling upon San Francisco Bay should review this best practice in its entirety prior to his/her first arrival in San Francisco Bay. Owners, operators and crews

should take into consideration that the nature of an emergency does not allow much time for deliberation. Accordingly, emergency procedures should be developed and practiced beforehand. The International Maritime Organization has developed Guidelines for owners/operators on preparing emergency towing procedures (MSC.1/Circ.1255) and Guidelines on emergency towing arrangement for tankers (MSC.35(63), as amended) to assist vessels with meeting the requirements of SOLAS regulation II-1/3-4 (**Appendix D**). The IMO has also developed Guidelines for Safe Ocean Towing (MSC/Circ884), which does not apply to salvage or rescue towing services but provides additional guidance which may be useful for towing vessels.

SHIP EVALUATION

The Master/Crew/Owner/Operator of a vessel should prepare an evaluation to identify their ship's towing capabilities and limitations under various towing configurations. This evaluation/inspection should take into consideration the structure of the ship, the safe working loads of the mooring and ground tackle aboard the ship, the ability to use powered equipment under various casualties, and the equipment aboard the vessel that could be used in an emergency towing situation. Consult SOLAS regulation II-1/3-4 (**Appendix D**) for further details.

PROCEDURES

In conjunction with the Ship Evaluation, the vessel owner/operator shall develop procedures for making up to a rescue tug. Procedures should be developed for various emergency scenarios taking into consideration scenarios involving an immediate threat of grounding, weather conditions (mild & severe), and non-availability of onboard power. Procedures should be specific to facilitate proper execution by crew members. Diagrams of possible rigging scenarios could be developed into a matrix to allow for rapid identification of a tow plan once a ship finds itself in a specific situation.

TRAINING

As with any casualty the possibility of a successful outcome is increased if the crew is trained in dealing with such a situation. The ship-specific procedures should be shared with the crew and Emergency Towing Drills should be incorporated into the ship's drill schedule. Through regular drills and post-drill critiques the ship-specific procedures can be updated and improved from lessons learned during training which will further increase the chance of a successful outcome in an emergency situation.

EMERGENCY TOW BOOK

The inventory gathered during the evaluation process and the resulting procedures should then be documented in a ship-specific Emergency Tow Book (ETB). A sample template of an ETB developed by the IMO is included as **Appendix E**. Vessel Owner/Operators/Agents should have access to this information and be able to immediately distribute it via email to the towing company and to other industry parties participating in the response. Receipt of a copy of the ETB prior to departure on to the distressed vessel will assist the towing companies to more efficiently prepare for the job and is a key factor in the success of the emergency tow.

NOTIFICATION

Early notification to the Coast Guard of a vessel casualty is a key element of initiating an effective response. Vessel owners and operators are required to provide notifications to the Coast Guard in accordance with 46CFR4 and 33 CFR 161 (when within the VTS Area).

COMMUNICATION

In the event of a casualty that may require an emergency tow, time is critical. Early activation of a response by the vessel will decrease the severity of the casualty. Most vessels will never encounter the need to activate such a response, but, if required, the complexity of the situation will be hectic and difficult to relay. The checklist contained in **(Appendix F)** is included in this BMP to serve as a reference for the timely and accurate communication of key information needed to begin a response.

Owners/Operators/Brokers should expedite the decision of which tug company to use so that the tug company can activate its plan.

VRP ACTIVATION

The RP shall activate their Vessel Response Plan (VRP); and/or their Salvage and Marine Firefighting Plan (SMFFP) as applicable under 33CFR155. The provisions of this BMP are non-regulatory in nature and are complementary guidance to VRPs and SMFFPs. The goal of this BMP is to prevent a drift grounding situation by ensuring that appropriately sized and equipped tugs are dispatched to enact the Emergency Towing requirement of the SMFFP in a timely manner. In the event that either the Vessel Response Plan (VRP) indicates the stand-up of a UC or if the Coast Guard determines that a UC is needed, the RP must have a representative present in the UC.

5. TUG COMPANY'S RESPONSIBILITIES

GENERAL

This Best Maritime Practice is also intended to provide towing companies who may be called upon to respond with guidance to ensure that their tug is prepared to respond safely and effectively. Tug companies intending to engage in emergency ship towing operations are encouraged to review and ensure that their Safety Management System is inclusive of control measures that are applicable to such towing operations.

Each tug company offering emergency towing services should have specific procedures contained in their Safety Management System (SMS), or equivalent Operations Manual. The procedures should include specific requirements for what information, equipment, and crew complement is required for various emergency towing scenarios. The Ship Rescue Requirement Checklist template **(Appendix G)** can be a useful tool in ensuring that preparation is thorough. Making up the vessel to the tug is the largest variable in the towing operation; therefore the tug operators' procedures need to address various possible makeups. **Appendix H** shows examples of possible towing configurations that could be used for an emergency towing operation. Procedures should be divided up, separating tasks that should be completed prior to departure, while underway to the vessel, on scene arrival, and during the tow to the final destination. Job safety should be the number one priority and safety meetings with the crew

should be held prior to departure and frequently during the operation, specifically including prior to making up to the vessel and after and an on scene risk assessment has been completed.

TRAINING

It is important not only to have procedures, but to incorporate those procedures into the tug company's training regimen. Not all the mariners working on tugs regularly handle the gear required to accomplish an emergency tow so it is critical that drills and exercises be held to simulate offshore towing operations. Drills should include a review of procedures for deploying an Orville Hook, use of a line throwing apparatus, deployment of an Emergency Ship Towing System (ESTS), a review of various kinds of ground tackle used in connecting a vessel tow. Tug companies offering Emergency Ship Towing services should participate in the Periodic HSC Emergency Towing Exercises. Tug companies should also attempt to hold training with their customers to incorporate ships into the training to more closely simulate actual responses.

COMMUNICATION

The USCG Home Port Alert Warning System alerts tug companies of the possibility of an emergency tow and allows them to begin the process of preparation. Swift and timely preparation can save valuable time in the overall response and significantly reduce risk. The USCG Home Port Alert Warning System message is for information purposes only; it does not award the job to a specific tug company. To the maximum extent possible, Owners/Operators/Brokers should expedite the decision of which tug company to use so that company can begin its preparations accordingly.

As soon as a tug company has been selected, it should be sent a copy of the ship's Emergency Tow Book (ETB). After an initial review of the ETB, the tug company should make direct contact with the vessel to discuss the specifics of the casualty using the communication checklist (**Appendix F**) as a reference to ensure that all pertinent information is gathered. A preliminary tow plan should be agreed upon during this communication, such that the vessel and the tug can begin preparations.

This first communication should also establish the primary and back up methods of communication, as well as a schedule of communications between the vessel and the lead tug.

RISK ASSESSMENT

Tug Companies should conduct a full Risk Assessment prior to getting underway. The Risk Assessment should be conducted with the objective of identifying and implementing any necessary control measures that will reduce the risk to personnel and equipment during the upcoming operation. If the company does not have an official Risk Assessment process in place, the local Coast Guard Sector has several tools available that may assist in this process.

MANNING

It is the sole responsibility of the tug company to ensure that their tug is crewed adequately. In addition to the minimum manning requirements of 46CFR15, the tug company should ensure that a suitable

number of crew, with appropriate training to fulfill their roles on the voyage, are aboard the tug to safely execute the emergency towing operation .

EQUIPMENT

It is up to the towing company to ensure that suitable rescue towing equipment is inventoried, maintained in good working order and is readily available to be deployed. Since the various tug companies employ various equipment packages, a specific equipment list will not be included in the BMP. However, the Ship Rescue Requirement Checklist template (**Appendix G**) can be a useful guide for ensuring that preparation is thorough.

DEVELOPING THE TOW PLAN

The towing company should develop a tow plan consistent with its Safety Management System/Operations Manual and the ship's Emergency Towing Booklet. The tow plan should incorporate the tenets of the Best Practices of Dead Ship Towing as applicable to the situation. Tow plans are intended to be dynamic, allowing for deviations and adjustments as dictated by the changing conditions. Where conditions permit, the tow plan should be drafted and available for review prior to the tug departing for the Emergency Ship Tow.

ARRIVING ON SCENE/EVALUATION OF SHIP

When the tug arrives at the vessel's location the tug Master should circle the ship to check its condition, drafts and trim. Once that is done the Master should stop the tug and lay ahead and then astern of the ship to see how the ship and tug will drift and lay relative to each other when at each location. Keep in mind that different ships will lay to weather, seas and current differently and will drift to the lee side at different rates. If the Master determines that the actual conditions are significantly different than what was identified in the initial risk assessment, the Master should conduct an additional risk assessment and take necessary action to mitigate those risks. .

COMMUNICATING THE TOW PLAN

Once the tug Master establishes his final operational plan for taking the ship under tow, he should provide the ship with a copy so the vessel understands the rigging and what is expected of them in the operation. A final pre-job conference must be held between the Master of the lead tug and the vessel's Master once the vessels are in close proximity to one another. Close radio communications between the tug and ship are crucial to executing a successful tow. Often ships have communication procedures routing all external coms (from the tug) through the ship's bridge and then on to the working deck crew. This can be very challenging. If possible, the Master of the lead tug should request direct communications with the working deck supervisor.

EXECUTING THE TOW PLAN

Once the final tow plan has been communicated to the satisfaction of both Masters, the Tug Master should proceed with the tow connection, ensuring that personnel safety remains the priority.

The Tug Master should now be able to pick the best orientation of his tug relative to the ship and position the tug to make the tow connection. In most cases this will end up being in the lee of the ship's bow, but it depends on the connection method to be used and the sea conditions. If the ship has severe bow damage, then a stern first tow will have to be considered. The Master should choose the position of the tug which reduces maneuvering and holds the tug at a constant safe distance to the vessel.

If the weather is heavy, the disabled vessel is not in immediate danger of going aground on a lee shore, and it is in the interest of safety, the Master may choose to delay the tow connection until weather and sea conditions improve. Any such decision should be communicated to the Unified Command.

TOW ARRANGEMENTS, CONNECTION METHODS AND GEAR

The ship's connection to the tug's tow gear will depend on the arrangement set forth in the Ship's Emergency Tow Book (ETB). Preferably prior to departure, the tug should obtain a copy of the ship's ETB and talk to the vessel master in order to ensure that the tug's gear is ready to be deployed. (Since every Emergency Ship Tow varies, it is not possible to outline exactly how a tug should connect to a ship. That being said, it is important for Tug Companies to utilize all resources available to them to execute a successful tow.

TOWING DESTINATION

The Tow Plan should include a destination for the ship well before the tug and ship are made up. The vessel owner must work with Federal (and State regulators and other stakeholders as required) to gain approval of the destination taking into consideration the nature of the vessel's casualty and associated repair needs. Vessel owners, Pilots, and/or regulators may require additional tugs or other operational controls as the vessel approaches its destination. Parties should reference the existing Best Maritime Practice for Dead Ship Towing in San Francisco Bay.



April 9, 2014

Captain Lynn Korwatch, Chair
San Francisco Harbor Safety Committee
Via email: hsc@sfmtx.org

**RE: Review of San Francisco Bay Harbor Safety Committee Tug Workgroup
*Emergency Offshore Towing Best Maritime Practices***

Dear Captain Korwatch:

Please accept the following comments from the Environmental Action Committee of West Marin (EAC) regarding agenda item 11, the Tug Workgroup's Best Maritime Practices (BMPs) for Emergency Towing recommendations to the San Francisco Harbor Safety Committee (Committee). I will be at the California Coastal Commission meeting in Santa Barbara tomorrow and thus unable to attend the Committee meeting tomorrow.

EAC strongly supports the Harbor Safety Committee's adoption of the recommended BMPs and offers the following comments and suggestions based on the Workgroup's document. We greatly appreciate the excellent work and dedication by members of the Tug Workgroup to improve emergency offshore towing practices.

Overview

The Response Priorities on page 2 states, "If adequate assets are not initially available to begin a towing evolution, it may be necessary to send smaller / less powerful assets to temporarily stabilize and hold the vessel". Multiple smaller / less powerful assets may not be capable of initially stabilizing a drifting vessel and isolating it from immediate danger, especially in rough to very rough weather. It is our belief that a single purpose built and equipped vessel with a highly trained crew may be more suited to this response priority. This concept should be evaluated by an independent risk assessment specialist in addition to Recommendation 3 below.

Recommendations

We support the Workgroup request for OSPR to commission a study to validate the Emergency Tow Vessel Capability Matrix specific to the environmental conditions and likely vessel traffic off the Northern California Coast. This study should be conducted by an independent organization specializing in vessel traffic risk assessment such as Det Norske Veritas or George Washington University.

Environmental Action Committee of West Marin
PO Box 609 Point Reyes, California 94956
www.eacmarin.org 415.663.9312

Decision Action Matrix

1. This tool to enhance risk assessment and decision-making must be tested often and refined as necessary.
2. We believe that using a 2-knot drift is not appropriate. Actual responses have shown drift rates of nearly 4 knots. Please provide documentation about from where the 2-knot drift rate comes.
3. A tug speed of 10 knots is unrealistic for all the escort vessels in all of the environmental conditions they are likely to encounter in the approaches to the Bay Area.
4. Response times are from the Golden Gate bridge, tugs may be berthed and require as much as an hour to reach the Golden Gate. Are mobilization times accounted for in the determination of offshore geographic priority regions?
5. Please explain the Escort Tug Inspection Program in more detail including what parameters are used by OSPR in the certification of escort and emergency towing vessels.

Exercise Frequency

1. Holding tabletops twice in three years is not sufficient given the recent announcement by OSPR that just over 50% of the Spill Maritime Teams drilled in 2013 were unsuccessful in completing the required drill objectives and participating in a Unified Command during unannounced tabletop drills.
2. Testing the Best Maritime Practices once every three years is not sufficient to identify and correct shortcomings and deficiencies in the SF Bay emergency offshore towing posture. The Committee should plan an annual emergency offshore towing exercise/drill that includes tabletop and equipment deployment components.

Appendices

Safety Risk Matrix

1. If the boundaries between the yellow and red zones are not definitive as stated in the BMP, in our opinion the entire area within the 4-hour concentric response time zone from the Golden Gate should be included in the high risk or red zone, not the yellow or caution zone. This high risk or red zone categorization should remain in place until the Emergency Tow Vessel Capability Matrix is validated by a third party, independent study.

General Comments

1. Historical incidents, while useful for their lessons learned and experience given to participants, cannot be assumed with much confidence to represent all of the possible emergency towing situations that may be encountered. For this reason we recommend continual drilling and exercising of the procedures outlined in the BMP.
2. A single tabletop exercise was used to determine that a BMP for Emergency Offshore Towing would be a sufficient and appropriate method to ensure readiness for emergency response. This exercise assumed zero errors and delays, whether mechanical or human caused. In the exercise, the save was made with approximately two hours before the vessel would theoretically have run aground. This is a narrow margin of error and should be recognized as such.

3. This approach to improving the emergency towing capacity in the SF Bay Area needs to be further validated. Exercises should include initial notification, mobilization, and deployment of the appropriate tugs required on scene in order to further evaluate the suitability of the Alert Warning System. An OSPR funded independent observer(s) with experience evaluating emergency towing exercises should be present to document the exercise(s).

4. EAC and the public would appreciate knowing the details of OSPR's involvement in emergency towing preparedness, planning, notification procedures, and vessel adequacy/certification? Does OSPR currently have a staff person that serves as an emergency response planning manager who monitors and assesses this essential component of maritime transportation safety? If not, this seems like it should be a priority.

Thank you very much for your consideration of EAC's comments, and thank you again to the Tug Workgroup for its outstanding recommendations.

Respectfully yours,

A handwritten signature in cursive script that reads "Amy Trainer". The signature is written in black ink and includes a long horizontal flourish extending to the right.

Amy Trainer, Executive Director