

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, October 14, 2021

Remote Meeting Via Zoom

10 Commodore Drive, Emeryville, 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 10:01.

Marcus Freeling (A), Marine Exchange, confirmed the presence of a quorum of the HSC.

Committee members (M) and alternates (A) in attendance with a vote: **Cody Aichele-Rothman** (A), Bay Conservation and Development Commission; **John Berge** (M), Pacific Merchant Shipping Association; **Robert Estrada** (M), Inlandboatmen's Union; **Jeff Ferguson** (M), NOAA; **Scott Grindy** (M), San Francisco Small Craft Harbor; **Troy Hosmer** (M), Port of Oakland; **Dakota Jude** (A), Kinder Morgan; **Capt. Thomas Kirsch** (M), Blue and Gold Fleet; **Capt. Taylor Lam** (M), United States Coast Guard; **Dominic Moreno** (M), Port of San Francisco; **Capt. Paul Ruff** (M), San Francisco Bar Pilots; **Jessica Vargas** (A), US Army Corps of Engineers; **Capt. Amanda Wallace** (M), Chevron Shipping Company; **Capt. Bradford Westlund** (A), AMNAV Maritime Services.

The meetings are always open to the public.

Approval of the Minutes-

A motion to accept the minutes of the September 9, 2021 meeting was made and seconded. The minutes were approved without dissent.

Comments by the Chair- Capt. Lynn Korwatch

Welcomed the committee members and audience. The November HSC meeting will be held on Wednesday, November 10th via Zoom. Veteran's Day is that Thursday. Plans are being made to resume in-person meetings next year.

Coast Guard Report- Capt. Taylor Lam

- Fleet Week was a successful and safe event celebrating the military, first responders, and the greater maritime community at large.
- Illegal charter enforcement is a priority. During Fleet Week, the USCG encountered an overloaded charter vessel posing a serious risk to passenger safety. Report illegal charters and safety issues to the Coast Guard.

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- Cruise ships have returned to San Francisco after a long hiatus due to Covid-19. The USCG will be hosting a multi-agency cruise ship mass rescue tabletop exercise on October 28th. Contact Paul Martin, USCG, for information: paul.r.martin@uscg.mil.
- USCG MSIB 13-20 (Change 3) was issued in April regarding TWIC regulations for maritime facilities and vessels. Enforcement of TWIC reader regulations is delayed until January 2022.
- The USCG will be supporting the city of San Francisco's New Year's Eve fireworks show safety and security team coordinated by the DHS.
- LTJG William Harris read from the September- 2021 Prevention/Response Report (attached).
- Capt. Paul Ruff advised of a recent incident involving a ship targeted by a laser pointer. This is an increasing problem for pilots. Capt. Korwatch advised that laser strikes can be a serious safety issue.

Army Corps of Engineers Report- Jessica Vargas

- Read from the US Army Corps of Engineers, San Francisco District Report (attached). 2021 dredge season contracts have been awarded and dredging is underway. The debris removal vessel Dillard is out of service for repairs. Debris removal numbers for September were below average. Surveys are posted and a channel condition report is included.

Clearinghouse Report- Marcus Freeling (report attached)

OSPR Report- Ted Mar

- Dave Mighetto, OSPR, will be retiring at the end of the year and a replacement will be hired.
- Information about the pipeline oil spill in Long Beach can be found at: www.socalspillresponse.com. The spill is impacting Orange and San Diego Counties. Capt. Korwatch asked about media reports that the spill was caused by a vessel dragging anchor. Ted Mar declined to comment specifically on the ongoing investigation.

NOAA Report- Jeff Ferguson

- Read from the NOAA HSC Report for October 2021 (attached). The transition from raster charts to ENC's is continuing with more local raster charts scheduled to be canceled in April 2022. The NOAA ship Fairweather has departed the region after a shortened stay due to Covid-19 issues. The survey data will be made available to the public. Shoaling has been detected near the Main Ship Channel but does not impact navigation. The last NOAA Marine Debris Program webinar is

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on October 27th. The NWS reports that a La Nina watch is now in effect which could bring drier than normal conditions this winter.

State Lands Commission Report- (report attached)

Work Group Reports-

Tug Work Group- Capt. Brad Westlund: Nothing to report.

Navigation Work Group- Capt. Paul Ruff: VSR best practices are still being finalized. An HSC vote will be held to approve the best practices when complete. Capt. Korwatch asked about reduced numbers of vessels drifting offshore and anchoring while waiting for berth. Capt. Lam advised that Anchorage 9 is not currently full. Capt. Ruff advised that there are indications that more ships will be returning to the Port of Oakland and an uptick in shipping is expected.

Ferry Operations Work Group- Capt. Tom Kirsch: Nothing to report.

Dredge Issues Work Group- Nothing to report.

PORTS Work Group- Troy Hosmer: Nothing to report.

Prevention through People Work Group- Scott Grindy: Several boat thefts have occurred recently but the vessels were recovered due to partnerships with other harbors through the Work Group. Fleet Week was a busy but successful event with many boats anchoring off Marina Green. Dominic Moreno advised that San Francisco held the only in-person Fleet Week in the nation this year. Multiple events were held including the Parade of Ships and Blue Angels airshow. No major incidents were reported. Cruise ships are returning to the port.

PORTS Report- Marcus Freeling

- Southampton Shoal LB6, Oakland LB4, and Oakland LB3 buoy-mounted current meter equipment was removed yesterday for service and repair. Redeployment of the current meters will be scheduled. A malfunctioning IP modem was replaced at the Richmond Tide Station and power issues seem to have improved. NOAA is planning to service all PORTS tide stations this fall. The UP-Railroad Bridge wind station is offline and an escort to the station is being scheduled. Routine maintenance is ongoing.
- PORTS data is publicly available through NOAA's Tides and Currents website:
<https://tidesandcurrents.noaa.gov/ports/index.html?port=sf>

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Public Comment-

- A Pacific States Oil Spill Task Force meeting will be held on November 17th.
- CDR Hale Allegretti, USCG, followed up on the ship laser strike incident reported. The USCG investigated the incident and determined that the laser came from a land-based position. Local law enforcement was notified.

Old Business- None

New Business-

- Capt. Korwatch announced that the November HSC meeting will be on Wednesday, November 10th. The meeting's original date fell on Veteran's Day this year and was rescheduled.

Next Meeting-

1000-1200, November 10, 2021
Remote Meeting via Zoom

Adjournment-

A motion to adjourn to meeting was made and seconded. The motion passed without dissent and the meeting adjourned at 10:43.

Respectfully submitted:



Capt. Lynn Korwatch

SIGNIFICANT PORT SAFETY AND SECURITY CASES (SEPTEMBER 2021)**MARINE CASUALTIES**

Allision, KIRAN AUSTRALIA (01SEP21): A foreign flag bulk carrier allided with the UP Railroad Bridge while transiting under the bridge en route to Pittsburgh. The allision was due to a miscalculation of the air draft and resulted in the mast light of the vessel snapping off. Unknown the extent of the damage of the UP Railroad Bridge, DIO's are conducting their investigation. Case Pends.

Laser Strike on commercial vessel, ATB COMMITMENT (06SEP21): A U.S. flagged tug and barge reported being struck by a laser while transiting the Carquinez Straits. The laser was coming from one of the houses on the hill in Crockett (IVO Rithet Park). The crew was unharmed and continued their journey. Case closed.

Loss of maneuverability, SONOMA FERRY (09SEP21): A US flag passenger vessel repoted intermittent rudder malfunction while transiting through the San Francisco Bay to Tiburon. The master reported that the rudder angle indicator from the primary helm didn't respond when turning the wheel. The vessel reported having 3 other operational steering methods. The vessel conducted repairs and was satisfactorily inspected by a Coast Guard MI. Case closed.

Passenger Overboard, Passenger Vessel CHARDONNAY II (09SEP21): A U.S. flagged small passenger vessel reported a passenger jumped from the vessel and the passenger swam back to shore while the it was still underway. Case closed.

Equipment Failure, UPRR BRIDGE (10SEP21): The Union Pacific Railroad Bridge (Benicia-Matinez Railroad Bridge) reported a loss of commercial power due to a downed power line and subsequent explosion in Benicia. The bridge and was unable to lift for vessel traffic. The bridge tender was able to bypass the "indicator lockout" and resume normal bridge operations. Case closed.

Equipment Failure, ATB OSG ENDURANCE (11SEP21): A U.S flagged tug reported a cylinder failure while underway and outbound of San Francisco Bay en route to Washington state. The vessel returned to Anchorage 8 and both engines remained online during the transit. Vessel conducted repairs on the #1 Main diesel engine. Case closed.

Reduction in Propulsion, STAR CARIOCA (12SEP21): A foreign flagged bulk carrier reported a reduction in propulsion due to an electronic failure with the fuel pump. Vessel proceeded from Anchorage 9 to Anchorage 7 to complete repairs. Case closed.

Fire, SPV EMPRESS (19SEP21): A U.S. flagged small passenger vessel reported an engine fire while underway near Treasure Island with 13 POB. Good Samaritans arrived on scene and assisted the vessel in anchoring so they could assess the damages prior to getting underway. The vessel determined that the fire was actually smoke originating from a melting belt on the port engine and was able to safely start their starboard engine. The EMPRESS was assisted back to berth and all passengers safely disembarked. Case closed.

Reduction in Propulsion, Towing Vessel SIGRID DUNLAP (20SEP21): A U.S. flagged towing vessel experienced a reduction in propulsion while underway and engaged in a tow enroute to Hawaii. The port main engine indicated a high air inlet temperature alarm along with a reduction in rpm's. The vessel anchored outside the SF Bay Entrance Buoy and disassembled turbo housings to reveal that exhaust bellows had failed, causing a substantial exhaust leak. Repairs were made to the engine. Case Closed.

Reduction of Propulsion, M/V MAJULAH HARBOURFRONT (27SEP21): A foreign flagged bulk carrier experienced a reduction in propulsion during its transit from Stocton to Richmond. The vessel's main propulsion engine overheated, resulting in a reduction in maneuverability. The pilot onboard terminated the voyage and anchored the vessel in the vicinity of New York Point, CA. Vessel conducted repairs. Case closed.

VESSEL SAFETY CONDITIONS

Operational Control, M/V KIRAN AUSTRALIAN (02SEP21), A foreign flag bulk carrier was inspected at the Port of Pittsburgh and issued a operational control (Code 17) due to inoperable INMARSAT-C unit. Equipment damage was sustained due to an allision with the UP Bridge. Technician replaced and repaired unit. Case Closed.
Operational Control, M/V SONOMA (09SEP21) A US flag ferry was transiting through the San Francisco Bay, enroute to Tiburon, when they received an intermittent alarm for steering and propulsion and experienced an intermittent rudder angle indicator malfunction. The vessel was issued an operational control (CG-835V Code 60) to remain at berth until steering was fully operational. Vessel completed repairs. Case Closed.
Operational Control, SPV DEL NORTE (09SEP21): US flag vessel was shifting within the Lakspur Terminal from berth #4 to berth #1 when they exhibited signs of a waterjet hub seal failure. The vessel had water ingress into the impeller hub's lube oil system. The vessel was issued an operational control (CG-835V Code 17) that restricted vessel from moving or carrying passengers. Case pends.
Operational Control, STAR CARIOCA (12SEP21): A U.S. flag small passenger vessel was issued a Captain of the Port Order for operating without a valid U.S. Coast Guard Certificate of Inspection. Case pends.
Operational Control, SPV LIL TAXI (13SEP21): A U.S. flagged small passenger vessel was issued an operational control (CG-835V Code 60) because the vessel failed to schedule drydock and internal structural examination within two years of last drydock as listed on the Certificate of Inspection. Case pends.
Operational Control, SPV WILD GOOSE II (13SEP21): A U.S. flagged small passenger vessel was issued an operational control (CG-835V Code 17), requiring a renewal of a Certificate of Inspection to determine if the vessel is in satisfactory condition, fit for the service intended, and applies with all applicable regulations. Case pends.
Operational Control, SPV BAY VOYAGER (15SEP21): A U.S. flagged small passenger vessel was issued an operational control (CG-835V, Code 17) for the vessel's fireboy system in the fuel tank space requiring servicing by a third party and tested by CG MI to complete re-inspection for annual certification. Case pends.
Operational Control, SPV SANCTUARY (16SEP21): A U.S. flagged small passenger vessel issued an operational control (CG-835V, Code 17) due to vessel's fireboy system in the fuel tank space requiring servicing by a third party and tested by CG MI to complete re-inspection for annual certification. Case pends.
Vessel Detention, M/V CAPT DAVID I LYON (16SEP21): Sector San Francisco has issued a U.S. Flag state detention on the containership CAPT DAVID I LYON, IMO# 9123037 pursuant to an ACP annual oversight inspection conducted on 15 and 16 September, 2021. The CG-835 (attached) was issued on 16 September 2021 at 2015 PST. The inspection was conducted at Military Ocean Terminal Concord. Case pends.
Operational Control, SPV EMPRESS (19SEP21): A U.S. flagged small passenger vessel was issued an operational control (code 17) due to significant damage of vessel's port engine caused by engine fire. The vessel conducted repairs and was satisfactorily inspected by Coast Guard MI. Case closed.
Operational Control, M/V MAJULAH WATERFRONT (27SEP21): A foreign flagged bulk carrier was issued a Captain of the Port Order for damge to the main engine due to overheating. Vessel conducted repairs and attended by class surveyor. Case closed.
Operational Control, CFV RIAN FAITH (28SEP21): A U.S. flagged small passenger vessel was issued a Captain of the Port order for the vessel's captain operating the vessel while under the influence of alcohol above the legal limit. Case pends.

NAVIGATIONAL SAFETY

Letter of Deviation (LOD), Inop Secondary Marine Radar, M/V PRESIDENT TRUMAN (17SEP21): A U.S. flag dry cargo vessel was issued an inbound LOD for inoperable secondary marine radar. Case pends.
Letter of Deviation (LOD), Inop S-Band Radar, Echo Depth Sounding Device/Recorder, M/V CIELO DI IYO(23SEP21): A U.S. flag container ship was issued an outbound LOD for inoperable echo depth sounding device. Repairs were conducted and equipment is working properly. Case closed.

SIGNIFICANT INCIDENT MANAGEMENT DIVISION CASES

Letter of Warning (02SEP2021): On 02SEP2021, IMD received notification that a recreational vessel had discharged approximately 1 gallon of oil from its bilge in Berkley, CA. Marina personnel deployed sorbent pads immediately to mitigate the discharge. The source of the pollution was secured with no further discharge. A NOFI and LOW were issued. Case Closed.

Letter of Warning (09SEP2021): On 09SEP2021, IMD received notification that a recreational vessel, moored in Potato Slough, discharged approximately 6 gallons of oil into the waterway after sinking. IMD investigated and found that the source of oil was coming from a compressor, on the stern of the vessel, that had residual gear oil in it. The owner deployed absorbent boom around the discharge and the sheening stopped. The source of pollution was secured with no further discharge. A NOFI and LOW were issued. Case Closed.

Letter of Warning (14SEP2021): On 14SEP2021, IMD received notification that a recreational vessel sank IVO Tomales Bay and discharged approximately 10 gallons of diesel. IMD had trouble contacting the owner, therefore, the case was federalized and local contractors were hired to remove the remaining pollution threat and refloat the vessel. NOAA paid local contractors to destroy the vessel. The source of pollution was secured with no further discharge. A NOFI and LOW were issued. Case Closed.

Notice of Violation (15SEP2021): On 15SEP2021, IMD received notification that a commercial fishing vessel had discharged approximately 200 gallons of diesel into Bodega Bay, IVO Spud Point Marina. The Vessel was conducting a tank-to-tank transfer and left the vessel unattended when diesel overflowed through the vents on-deck. Boom was initially deployed by the local fire department. The owner hired local contractors to put out additional boom and to begin clean-up operations. Throughout the clean-up operations, much of the diesel was recovered while some dissipated naturally. The source of pollution was secured with no further discharge. A NOFI and NOV were issued. Case Closed.

Letter of Warning (16SEP2021): On 16SEP2021, IMD received notification that a recreational vessel discharged approximately 2 gallons of diesel into the Monterey Bay after a faulty fuel filter caused a leak of diesel into the bilge of the vessel. The owner and the harbor master immediately deployed sorbent boom and pads and cleaned up what could be recovered. The fuel filter was replaced. The source of pollution was secured with no further discharge. A NOFI and LOW were issued. Case Closed.

Letter of Warning (17SEP2021): On 17SEP2021, IMD received notification that a vehicle drove into the water near Santa Cruz, CA, discharging approximately 12 gallons of gasoline into the Pacific Ocean. The local Sheriff hired a contractor to have the vehicle removed from the waterway, but due to heavy surf, will return when it is safe to do so. It is assumed a total discharge of all products occurred given the circumstances. A NOFI and LOW were issued. Case Closed.

Notice of Violation (19SEP2021): On 19SEP2021, IMD received notification that a commercial fishing vessel had sunk and discharged approximately 100 gallons of diesel into Half Moon Bay, IVO Pillar Point Harbor. Harbor patrol placed sorbent boom, sorbent pads, and hard boom around the vessel. The owner had insurance and hired local contractors to remove the remaining pollution threat and refloat the vessel. The source of pollution was secured with no further discharge. A NOFI and NOV were issued. Case Closed.

Notice of Violation (22SEP2021): On 22SEP2021, IMD received notification that a semi-truck had driven off the San Mateo Bridge discharging approximately 56 gallons of Diesel into the San Francisco Bay. Local contractors were hired and deployed sorbent material to recover as much pollution as possible and remove the vehicle from the waterway. It is assumed a total discharge of all products occurred given the circumstances. The source of pollution was secured with no further discharge. A NOFI and NOV were issued. Case Closed.

Letter of Warning (23SEP2021): On 23SEP2021, IMD received notification that a recreational vessel sank at the Richmond Marina, discharging approximately 1 gallon of oil. The source of pollution was found to be residual oil in the engine room. The owner, who had insurance, hired local contractors to refloat and remove the vessel from the waterway. The source of pollution was secured with no further discharge. A NOFI and LOW were issued. Case Closed.

Letter of Warning (23SEP2021): On 23SEP2021, IMD received notification that a recreational vessel discharged approximately 1 gallon of oil into the Oakland Estuary. The source of pollution was found to be an exhaust leak. The owner hired a mechanic who was able to fix the issue. The source of pollution was secured with no further discharge. A NOFI and LOW were issued. Case Closed.

Letter of Warning (25SEP2021): On 25SEP2021, IMD received notification that a recreational vessel was disabled in Monterey Bay and had discharged approximately 1 gallon of gasoline. The source of pollution was caused by an engine malfunction and the owner secured the engine immediately. The vessel was safely towed to a marina and removed from the waterway. The source of pollution was secured with no further discharge. A NOFI and LOW were issued. Case Closed.

PREVENTION / RESPONSE - SAN FRANCISCO HARBOR SAFETY STATISTICS			
September 2021			
PORT SAFETY CATEGORIES*	Sep-2021	Sep-2020	**3yr Avg
Total Number of Port State Control Detentions:	0	0	0.11
SOLAS (0), STCW (0), MARPOL (0), ISM (0), ISPS (0)			
Total Number of COTP Orders:	3	14	3.56
Navigation Safety (3), Port Safety & Security (0), ANOA (0)			
Marine Casualties (reportable CG 2692) within SF Bay:	10	6	7.78
Allision (1), Collision (0), Fire (1), Capsize (0), Grounding (0), Sinking (0)			
Steering (1), Propulsion (3), Personnel (1), Other (3), Power (0)			
Total Number of (routine) Navigation Safety issues/Letters of Deviation:	2	4	2.11
Radar (2), Gyro (0), Steering (0), Echo Sounder (0), AIS (0)			
ARPA (0), Speed Log (0), R.C. (0), Other (0)			
Reported or Verified "Rule 9" or other Navigational Rule Violations:	0	0	0.53
Significant Waterway events/Navigation related Cases:	0	0	0.06
Total Port Safety (PS) Cases opened	15	24	14.14
MARINE POLLUTION RESPONSE			
Pollution Discharge Sources (Vessels)	Sep-2021	Sep-2020	**3yr Avg
U.S. Commercial Vessels	0	1	0.89
Foreign Freight Vessels	0	0	0.22
Public Vessels	1	0	0.58
Commercial Fishing Vessels	2	0	0.72
Recreational Vessels	9	7	6.19
Pollution Discharge Sources (Facilities)	Sep-2021	Sep-2020	**3yr Avg
Regulated Waterfront Facilities	0	0	0.44
Regulated Waterfront Facilities - Fuel Transfer	0	0	0.06
Other Land Sources	4	4	3.47
Mystery Spills - Unknown Sources	2	7	4.78
Number of Pollution Incidents (By Spill Size)	Sep-2021	Sep-2020	**3yr Avg
Spills < 10 gallons	11	11	10.19
Spills 10 - 100 gallons	4	0	1.03
Spills 100 - 1000 gallons	1	1	0.39
Spills > 1000 gallons	0	0	0.00
Spills - Unknown Size	2	7	5.75
Total Pollution Incidents	18	19	17.36
Oil Discharge/Hazardous Materials Release Volumes by Spill Size	Sep-2021	Sep-2020	**3yr Avg
Estimated spill amount from U.S. Commercial Vessels	0.00	1.00	12.30
Estimated spill amount from Foreign Freight Vessels	0.00	0.00	0.28
Estimated spill amount from Public Vessels	5.00	0.00	5.60
Estimated spill amount from Commercial Fishing Vessels	300.00	0.00	29.78
Estimated spill amount from Recreational Vessels	24.00	306.00	83.51
Estimated spill amount from Regulated Waterfront Facilities	0.00	0.00	22.83
Estimated spill amount from Regulated Waterfront Facilities - Fuel Transfer	0.00	0.00	0.11
Estimated spill amount from Other Land Sources	70.00	12.00	29.01
Estimated spill amount from Unknown Sources (Mystery Sheens)	unk	unk	0.00
Total Oil Discharge and/or Hazardous Materials Release (Gallons)	399.00	319.00	183.41
Penalty Actions	Sep-2021	Sep-2020	**3yr Avg
Civil Penalty Cases	0	0	0.11
Notice of Violations	3	0	0.89
Letters of Warning	8	5	4.97
Total Penalty Actions	11	5	5.97
* 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.			

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

**Report of the
U.S. Army Corps of Engineers, San Francisco District
October 14, 2021**

1. CORPS O&M DREDGING PROGRAM

The following report covers the FY 2021 dredging program for San Francisco Bay. The FY21 Work Plan was released to the public on January 19 and the Corps team has completed the planning phase and fully transitioned to the execution phase for all dredging projects that received funding. The attached 2021 O&M Dredging Plan contains the list of funded projects, estimated procurement milestones, and dredging timelines. **Planning for the FY22 dredging program is currently underway based on FY22 President's Budget amounts. The FY22 project schedules will be published beginning next month.**

FY 2021 DREDGING

- a. **Oakland Harbor** – A contract for maintenance dredging was awarded to the Dutra Group on April 29. Dredging started on June 21 and is expected to finish by the end of November.
- b. **Redwood City Harbor** – A contract for maintenance dredging was awarded to Curtin Maritime on May 10. Dredging started on June 23 and **finished on September 15.**
- c. **San Pablo Bay (Pinole Shoal)** – The Government Hopper Dredge Essayons arrived on station June 9 and dredged for approximately 8 days. Next dredging event will occur in summer 2023. (Hopper dredging in San Francisco Bay continues to be limited to one event per year in accordance with our Water Quality Certification. Pinole Shoal is being dredged this year while Richmond Outer Harbor will be deferred until FY22.)
- d. **San Joaquin River (Port of Stockton)** – A contract for maintenance dredging was awarded to Pacific Dredge on July 6. **Dredging started on September 9 and will continue through November.**
- e. **Sacramento River Deep Water Ship Channel** – A contract for maintenance dredging was awarded to Ross Island Sand & Gravel on June 23. **Dredging started on August 5 and expected to finish by October 31.**
- f. **SF Main Ship Channel** – The West Coast Hopper Contract was awarded to the Dutra Group on April 16 by the Corps' Portland District. Dredging started on August 7 with initial placement at the near-shore site. Sand pump-ashore to Ocean Beach began on August 11 and **the last load was delivered the evening of September 18.**
- g. **Suisun Bay Channel (and New York Slough)** – A contract for maintenance dredging was awarded to Curtin Maritime on July 7. **Dredging started on September 17 and is expected to be complete around middle of October.**
- h. **Richmond Inner Harbor** – Original Bid Opening was held on July 12. The solicitation was subsequently cancelled with no award following a bid protest. A new solicitation was issued on August 20 with bids due by September 20. **A contract was awarded to the Dutra Group on September 27 and dredging is expected to be complete by the end of November.**

- i. **Richmond Outer Harbor (and Richmond Long Wharf)** – We continue to be limited to only one hopper dredge project per year by the Water Quality Certification. Pinole Shoal is being dredged this year while Richmond Outer Harbor will be deferred until FY22.

2. EMERGENCY (URGENT & COMPELLING) DREDGING

None at this time.

3. DEBRIS REMOVAL – Debris removal for September 2021 was 17.5 tons. Dillard: 0 tons (out of service for repair); Raccoon: 10.5 tons; other boats: 7 tons, including 3 abandoned vessels. Average for September from 2011 to 2020 is 42 tons (Range: 8.5-71.5).

BASEYARD DEBRIS COLLECTION TOTALS:

MONTH	RACCOON	DILLARD	MISC	TOTAL
2021	TONS	TONS	TONS	TONS
JAN	37	48	14	99
FEB	29	30.5	65	124.5
MAR	10	52.5	28	90.5
APR	19	12.5	10	41.5
MAY	9	30.5	75	114.5
JUN	7	56.5	14	77.5
JUL	19	10	0	29
AUG	20	55	0	75
SEP	10.5	0	7	17.5
OCT				
NOV				
DEC				

YR TOTAL
669

4. UNDERWAY OR UPCOMING HARBOR IMPROVEMENTS

Oakland Harbor Turning Basins Widening Study: This study will investigate and determine if there is a technically feasible, economically justifiable, and environmentally acceptable recommendation for federal participation in a navigation improvement project to the existing - 50-foot Oakland Harbor Federal Navigation Project. Currently, the scope of the tentatively selected alternative includes expansion of both inner and outer basins for a 1,310-foot design vessel. This expansion is expected to meet the needs of the future fleet. The 3x3x3 feasibility study is on track and on budget and the Project Delivery Team is targeting a Tentatively Selected Plan (TSP) milestone of September 28 and the release of a DRAFT Integrated Feasibility Report (IFR) by December of 2021 for public comment.

5. OTHER WORK

Regional Dredge Material Management Plan: Following public and stakeholders' outreach for the PMP, the project is now in phase 1 gap analysis to address the key issues as identified by the stakeholders from the virtual charrettes held in July 2020. SFEI has been contracted to perform this phase and is coordinating with the Interagency Working Group (IWG) to provide expert advice and review of work products associated with the RDMMP Gaps Analysis, including prioritizing the knowledge gaps identified by the project team and reviewing the scopes of work produced to address those knowledge gaps. Information on the RDMMP and draft final PMP can be found on our website:

<https://www.spn.usace.army.mil/Missions/Projects-and-Programs/Regional-Dredge-Material-Management-Plan/>

USACE Work Plan Web Address: <http://www.usace.army.mil/Missions/Civil-Works/Budget/>

Water Resources Development Act (WRDA) of 2020:

<https://transportation.house.gov/imo/media/doc/BILLS-116s1811-SUS.pdf>

As the U.S. Army Corps of Engineers, Civil Works (USACE CW) begins to work on implementation guidance for applicable WRDA provisions, five partner sessions were held March 16 through April 13. The partner sessions and the public comment period were used to gather input on WRDA provisions and implementation guidance. For more information on WRDA 2020 and the work on implementation guidance visit:

https://www.usace.army.mil/Missions/Civil-Works/Project-Planning/Legislative-Links/wrda_2020/

6. HYDROGRAPHIC SURVEY UPDATE

Address of Corps' web site for completed hydrographic surveys:

<http://www.spn.usace.army.mil/Missions/Surveys,StudiesStrategy/HydroSurvey.aspx>

The following surveys are posted:

Alameda Naval Navigation Channel: Condition survey of November 23 and 24, 2020.
Berkeley Marina (Entrance Channel): Condition survey of April 22, 2021.
Islais Creek Channel: Condition survey of August 26, 2021.
Larkspur Ferry Channel: Condition survey of April 8, 2020.
Mare Island Strait: Condition survey of September 29, 2021.
Marinship Channel (Richardson Bay): Condition survey of June 23, 2020 and April 20, 2021.
Napa River: Condition survey of March 11-15, 2021.
Northship Channel: Condition survey of September 20, 21, & 28, 2021.
Oakland Inner Harbor: Condition survey of May 5, 2021.
Oakland Inner Harbor (Brooklyn Basin): Condition survey of 15-20 January 2021.
Oakland Outer Harbor: Condition survey of May 4, 2021.
Petaluma River (Across-the-Flats): Post-dredge condition survey of December 15, 2020.
Petaluma River (Main Channel): Post-dredge survey of October 10, 12, and 16 2020.
Petaluma River (Extended Channel): Post-dredge survey of October 10, 12, and 16 2020.
Pinole Shoal Channel: Condition survey of June 24 – July 7, 2021.
Redwood City Harbor: Post dredge surveys of September 1, 6, 16, and 19, 2021.
Richmond Inner Harbor: Condition survey of July 31, 2021 and August 2, 2021.
Richmond Inner Harbor (Santa Fe Channel): Condition survey of December 20, 2016.
Richmond Outer Harbor (Longwharf): Condition survey of July 30, 2021.
Richmond Outer Harbor (Southampton Shoal): Condition survey of July 30, 2021.
Sacramento River Deep Water Ship Channel: Condition Survey of July 8-12, 2021.
San Bruno Shoal: Condition survey of February 26, 2021.
San Francisco Main Ship Channel: Condition survey of September 22-23, 2021.
San Leandro Marina (and Channel): Condition survey of March 30 and April 1, 2015.
San Rafael (Across-the-Flats): Condition survey of February 9, 2021.
San Rafael (Creek): Condition survey of February 9, 2021.
Stockton Ship Channel: Condition survey of July 8-12, 2021.
Suisun Bay Channel: Condition survey of September 27, 2021.
Suisun Bay Channel (Bullshead Reach): Condition survey of September 27, 2021.
Suisun Bay Channel (New York Slough): Condition survey of September 27, 2021.

Disposal Site Condition Surveys:

SF-08 (Main Ship Channel Disposal Site): Condition survey of Jul 27, 2021.
SF-09 (Carquinez): Condition survey of October 5, 2021.
SF-10 (San Pablo Bay): Condition survey of October 5, 2021.
SF-11 (Alcatraz Island): Condition survey of October 4, 2021.
SF-16 (Suisun Bay Disposal Site): Condition survey of May 26, 2021.
SF-17 (Ocean Beach Disposal Site): Condition survey of July 27, 2021.

Requested Surveys:

Pre/Post-dredge and condition surveys are scheduled to occur throughout the year for all of San Francisco District's in-bay projects which are planned to be dredged in FY21.

Channel Condition Report (CCR):

Attached is the Channel Condition Report (CCR) for all Corps maintained channels dated **12 OCT 2021**. The CCR is generated by the USACE eHydro database and is not a substitute for the controlling depths set by the SF Bar Pilots. Please see the respective bathymetric plots for locations (highlighted in red) of the shoaliest soundings reports in the CCR.

2021 O&M DREDGING PLAN*

Project	Bid Open	Award	FY2021												FY2022		Estimated CY	Dredge Type	Placement Site
			FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC	JAN	FEB				
Oakland Harbor	15-Apr (A)	29-Apr (A)		■	◆	◆	■	▨	▨	▨	▨	▨					1000kcy	Contract Clam Shell	SF-DODS
Redwood City Harbor	26-Apr (A)	10-May (A)		■	◆	◆	■	▨	▨	▨	▨	■	■				350kcy 125kcy	Contract Clam Shell	SF-11 Upland
Sacramento River (30 Foot Project)	11-Jun (A)	23-Jun (A)				■	◆	◆	■	▨	▨	■					150kcy	Contract Pipeline	Various Upland
San Joaquin River (Port of Stockton)	21-Jun (A)	6-Jul (A)				■	◆	◆	■	▨	▨	▨	▨				300kcy	Contract Pipeline	Various Upland
Suisun Bay Channel	29-Jun (A)	7-Jul (A)				■	◆	◆	■	■	■	■	▨	▨			175kcy	Contract Clam Shell	SF-16
Richmond Inner Harbor	20-Sep (A)	27-Sep (A)					■	◆	■	■	■	◆	■	▨			200kcy	Contract Clam Shell	SF-DODS
Humboldt Bar & Entrance Channels	N/A	N/A				■	ESS	■	■				■	WCH			1100kcy	Govt Hopper	HOODS
San Pablo Bay (Pinole Shoal)	N/A	N/A					■	ESS	■	■							250kcy	Govt Hopper	SF-9/ SF-10
SF Main Ship Channel	22-Mar (A)	16-Apr (A)		■	◆			■	WCH	■	■						350kcy	WCHC (Portland)	Ocean Beach
Work Plan Projects																			
Humboldt Interior Channels	N/A	N/A				■	■	■	■	■	■	■	■				150kcy	Govt Hopper	HOODS

	Solicitation	ESS Essayons	Environmental Window	
	Bid Opening	WCH West Coast Hopper Contract	Mobilization	
	Contract Award		New SPN Contract	
	Hopper Dredging		Funded for P&S only	

* Program execution is based on the FY21 Workplan plus FY20 Carryover. Date of Last Update: 10/6/2021

REPORT OF CHANNEL CONDITIONS
400 FEET WIDE OR GREATER

To: Navigation Interests		From: US Army Corps of Engineers San Francisco District 450 Golden Gate Ave San Francisco, CA 94102						
RIVER/HARBOR NAME AND STATE OTHER CALIFORNIA					MINIMUM DEPTHS IN EACH 1/4 WIDTH OF CHANNEL ENTERING FROM SEAWARD			
NAME OF CHANNEL	DATE OF SURVEY	AUTHORIZED PROJECT			LEFT OUTSIDE QUARTER (feet)	LEFT INSIDE QUARTER (feet)	RIGHT INSIDE QUARTER (feet)	RIGHT OUTSIDE QUARTER (feet)
		WIDTH (feet)	LENGTH (miles)	DEPTH (feet)				
Redwood City Harbor SEE PAGE 3 FOR CURRENT SURVEY	05-19-2021	300 943	3.94	30	22.4	25.6	25.1	22.2
San Bruno Shoal San Bruno Shoal	02-26-2021	500	5.66	30	28.9	31.1	31.6	30.5
Richardson Bay/Marinship Richardson Bay/Marinship	06-23-2020	300 1069	2.11	20	4.6	6.0	6.4	6.4
Islais Creek Islais Creek	08-27-2021	500 1424	1.71	40	30.7	37.5	37.5	23.9
Alameda Naval Air Alameda Naval Air	11-23-2020	1000 4178	2.90	37	11.4	12.5	18.9	17.1
San Rafael ATF Across the Flats	02-09-2021	100	2.25	8	2.4	4.2	4.0	2.3
San Rafael River Inner Canal Channel	02-09-2021	60 160	1.55	6	0.7	1.6	0.9	1.4
Petaluma River Main Channel	06-03-2020	100 361	4.06	8	No Data	1.4	2.8	No Data
Petaluma River ATF Across the Flats	12-15-2020	200 206	5.68	8	6.3	8.8	8.3	8.2
Mare Island Strait Mare Island Strait	09-29-2021	400 606	3.37	30	27.3	29.1	31.8	32.1
Larkspur Channel Larkspur Channel	07-11-2019	231 542	2.37	13	6.5	10.0	9.7	8.0
Northship Channel Northship Channel	09-20-2021	3576 4769	5.97	45	23.1	38.2	37.8	35.2
Berkeley Marina Berkeley Marina	04-22-2021	100 142	1.36	6	3.5	3.8	4.3	4.3
Bodega Bay Bodega Bay	09-24-2021	100 400	3.46	12	3.4	10.0	10.5	7.9
Moss Landing Moss Landing	03-31-2021	120 405	0.98	6	13.2	12.3	11.1	10.9
Noyo River Entrance Channel	02-10-2021	97 150	0.67	10	6.1	9.6	10.6	7.6

REPORT OF CHANNEL CONDITIONS
400 FEET WIDE OR GREATER

To: Navigation Interests		From: US Army Corps of Engineers San Francisco District 450 Golden Gate Ave San Francisco, CA 94102						
RIVER/HARBOR NAME AND STATE OTHER CALIFORNIA					MINIMUM DEPTHS IN EACH 1/4 WIDTH OF CHANNEL ENTERING FROM SEAWARD			
NAME OF CHANNEL	DATE OF SURVEY	AUTHORIZED PROJECT			LEFT OUTSIDE QUARTER (feet)	LEFT INSIDE QUARTER (feet)	RIGHT INSIDE QUARTER (feet)	RIGHT OUTSIDE QUARTER (feet)
		WIDTH (feet)	LENGTH (miles)	DEPTH (feet)				
Noyo River Channel	02-10-2021	97 150	0.67	10	8.3	9.9	10.5	3.6
Crescent City Entrance Channel	02-08-2021	200 320	0.42	20	18.1	19.4	19.0	17.2
Crescent City Inner Harbor Basin Channel	02-08-2021	200 300	0.39	15	14.8	14.8	15.0	13.8
Crescent City Marina Access Channel	02-08-2021	228 170	0.22	15	4.8	10.6	12.2	9.5
Pinole Shoal Channel Pinole Shoal Channel	06-24-2021	600 1644	10.36	35	31.3	35.4	35.9	34.7
Suisun Bay Channel Suisun Bay Channel	04-27-2021	300 350	13.86	35	32.7	33.3	32.7	30.7
Suisun Bay Channel Anchorage Suisun Bay Channel Anchorage	04-27-2021	400	0.90	35	33.8	No Data	No Data	No Data
New York Slough New York Slough	09-27-2021	400 411	4.42	35	35.2	35.6	35.2	35.1

REPORT OF CHANNEL CONDITIONS
400 FEET WIDE OR GREATER

To: Navigation Interests		From: US Army Corps of Engineers San Francisco District 450 Golden Gate Ave San Francisco, CA 94102						
RIVER/HARBOR NAME AND STATE REDWOOD CITY CALIFORNIA					MINIMUM DEPTHS IN EACH 1/4 WIDTH OF CHANNEL ENTERING FROM SEAWARD			
NAME OF CHANNEL	DATE OF SURVEY	AUTHORIZED PROJECT			LEFT OUTSIDE QUARTER (feet)	LEFT INSIDE QUARTER (feet)	RIGHT INSIDE QUARTER (feet)	RIGHT OUTSIDE QUARTER (feet)
		WIDTH (feet)	LENGTH (miles)	DEPTH (feet)				
Redwood City Harbor Redwood City Harbor	09-16-2021	300 943	3.94	30	30.1	30.0	30.3	30.3



Harbor Safety Committee of the
San Francisco Bay Region Clearing House
c/o Marine Exchange of the San Francisco Bay Region
10 Commodore Drive
Emeryville, California 94608
415-441-6600 -- hsc@sfmtx.org

San Francisco Clearinghouse Report

October 14, 2021

- ✎ In September the clearinghouse did not contact OSPR regarding any possible escort violations.
- ✎ In September the clearinghouse did not receive any notifications of vessels arriving at the Pilot Station without escort paperwork.
- ✎ The clearinghouse has not contacted OSPR so far in 2021 regarding any possible escort violations. The clearinghouse contacted OSPR 1 time in 2020 regarding a possible escort violation. The clearinghouse did not contact OSPR in 2019 regarding possible escort violations. The clearinghouse contacted OSPR 1 time in 2018 about a possible escort violation. The clearinghouse did not contact OSPR in 2017 about possible escort violations. The clearinghouse contacted OSPR 1 time in 2016 about a possible escort violation. The clearinghouse contacted OSPR 3 times in 2015 about possible escort violations. The clearinghouse contacted OSPR 5 times regarding possible escort violations in 2014. The clearinghouse contacted OSPR 1 time in 2013. The clearinghouse contacted OSPR 3 times in 2012 regarding 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 September there were 92 tank vessel arrivals; 19 ATBs, 7 Chemical Tankers, 12 Chemical/Oil Tankers, 23 Crude Oil Tankers, 1 LPG, 17 Product Tankers, and 13 Tugs with Barges.
- ✎ In September there were 190 total vessel arrivals.

San Francisco Bay Clearinghouse Report For September 2021

San Francisco Bay Region Totals

	<u>2021</u>		<u>2020</u>	
Tanker arrivals to San Francisco Bay	60		59	
ATB arrivals	19		11	
Barge arrivals to San Francisco Bay	13		11	
Total Tanker and Barge Arrivals	92		81	
Tank ship movements & escorted barge movements	295		279	
Tank ship movements	179	60.68%	148	53.05%
Escorted tank ship movements	142	48.14%	119	42.65%
Unescorted tank ship movements	37	12.54%	29	10.39%
Tank barge movements	116	39.32%	131	46.95%
Escorted tank barge movements	19	6.44%	18	6.45%
Unescorted tank barge movements	97	32.88%	113	40.50%

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

Escorts reported to OSPR 0 0

Movements by Zone	Zone 1	%	Zone 2	%	Zone 4	%	Zone 6	%	Total	%
Total movements	183		287		0		137		607	
Unescorted movements	73	39.89%	131	45.64%	0	0.00%	54	39.42%	258	42.50%
Tank ships	55	30.05%	95	33.10%	0	0.00%	47	34.31%	197	32.45%
Tank barges	18	9.84%	36	12.54%	0	0.00%	7	5.11%	61	10.05%
Escorted movements	110	60.11%	156	54.36%	0	0.00%	83	60.58%	349	57.50%
Tank ships	104	56.83%	138	48.08%	0	0.00%	76	55.47%	318	52.39%
Tank barges	6	3.28%	18	6.27%	0	0.00%	7	5.11%	31	5.11%

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 2021

San Francisco Bay Region Totals

	<u>2021</u>		<u>2020</u>	
Tanker arrivals to San Francisco Bay	526		723	
ATB arrivals	133		165	
Barge arrivals to San Francisco Bay	107		143	
Total Tanker and Barge Arrivals	766		1,031	
Tank ship movements & escorted barge movements	2,519		3,467	
Tank ship movements	1,385	54.98%	1,774	51.17%
Escorted tank ship movements	1,082	42.95%	1,383	39.89%
Unescorted tank ship movements	303	12.03%	391	11.28%
Tank barge movements	1,134	45.02%	1,693	48.83%
Escorted tank barge movements	193	7.66%	253	7.30%
Unescorted tank barge movements	941	37.36%	1,440	41.53%

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

Escorts reported to OSPR 0 0

Movements by Zone	Zone 1	%	Zone 2	%	Zone 4	%	Zone 6	%	Total	%
Total movements	1,544		2,450		0		1,055		5,049	
Unescorted movements	686	44.43%	1,214	49.55%	0	0.00%	459	43.51%	2,359	46.72%
Tank ships	537	34.78%	914	37.31%	0	0.00%	407	38.58%	1,858	36.80%
Tank barges	149	9.65%	300	12.24%	0	0.00%	52	4.93%	501	9.92%
Escorted movements	858	55.57%	1,236	50.45%	0	0.00%	596	56.49%	2,690	53.28%
Tank ships	795	51.49%	1,057	43.14%	0	0.00%	532	50.43%	2,384	47.22%
Tank barges	63	4.08%	179	7.31%	0	0.00%	64	6.07%	306	6.06%

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.

NOAA report to the San Francisco Bay Harbor Safety Committee

October 2021

Transitioning to Electronic Navigational Charts (ENC)

NOAA continues the process to discontinue production of raster chart products.

Several charts in the San Francisco Bay region have been announced as “to be cancelled”. This announcement starts a 6 month clock that ends with the charts being cancelled in April 2022.

18659	View	LAST EDITION - SUISUN BAY-Mallard Island to Antioch (Chart will be canceled on 04/06/22.)
18660	View	LAST EDITION - San Joaquin River Stockton Deep Water Channel Antioch to Medford Island (Chart will be canceled on 04/06/22.)
18666	View	LAST EDITION - Suisun Bay Middle Ground to New York Slough (Chart will be canceled on 04/06/22.)
18667	View	LAST EDITION - Sacramento River Fourmile Bend To Colusa (Chart will be canceled on 04/06/22.)
18682	View	LAST EDITION - Half Moon Bay (Chart will be canceled on 04/06/22.)

Charts on the “to be cancelled” list will be announced in the Local Notice to Mariners. You can also see the current list on our website at:

<https://www.charts.noaa.gov/MCD/DoleLastEdByChart.shtml>

After the cancellation date of 04/06/2022, these raster charts will no longer be available for download and will no longer be referenced in the notice to mariners.

NOAA’s Custom Chart Tool can be used to convert ENC data to a PDF that looks similar to a raster chart. A few Print on Demand vendors are using the Tool to continue to sell paper charts in areas where raster charts have been discontinued.

The Custom Chart Tool is available here: <https://devgis.charttools.noaa.gov/pod/>

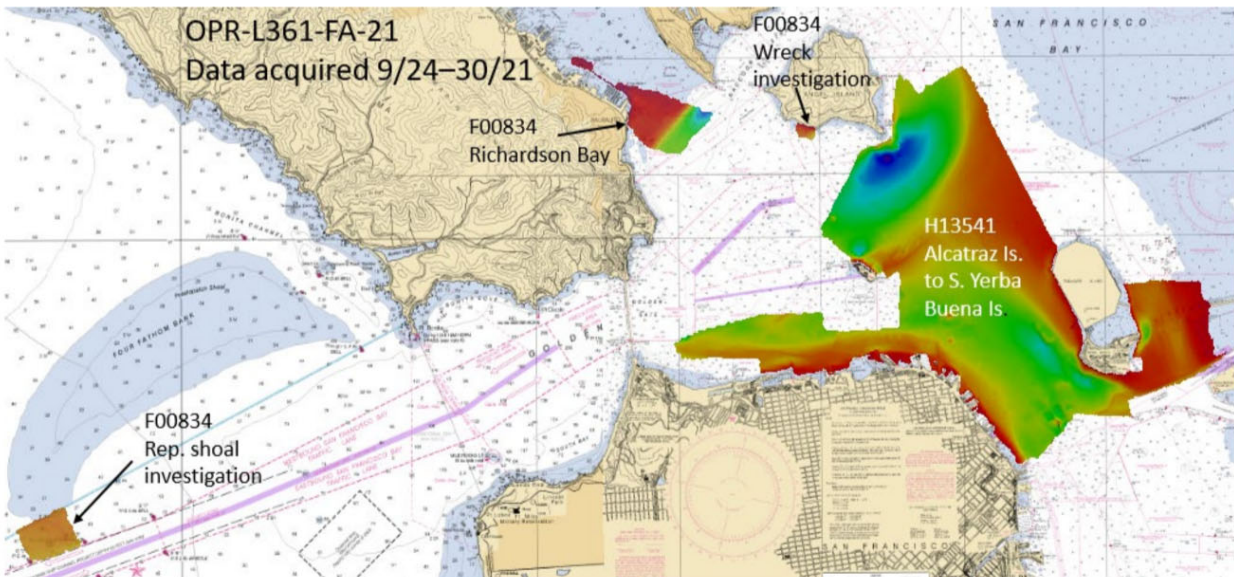
NOAA Ship FAIRWEATHER survey

The FAIRWEATHER completed its survey in San Francisco Bay.

Unfortunately, due to COVID related issues, the ship was delayed departing Ketchikan, Alaska. Therefore, there was not as much time on site as originally planned.

See coverage charlet below to see the areas completed.

All this data will take a few months to process and validate. Once validated, it will be publicly available and will be used to update the nautical charts.

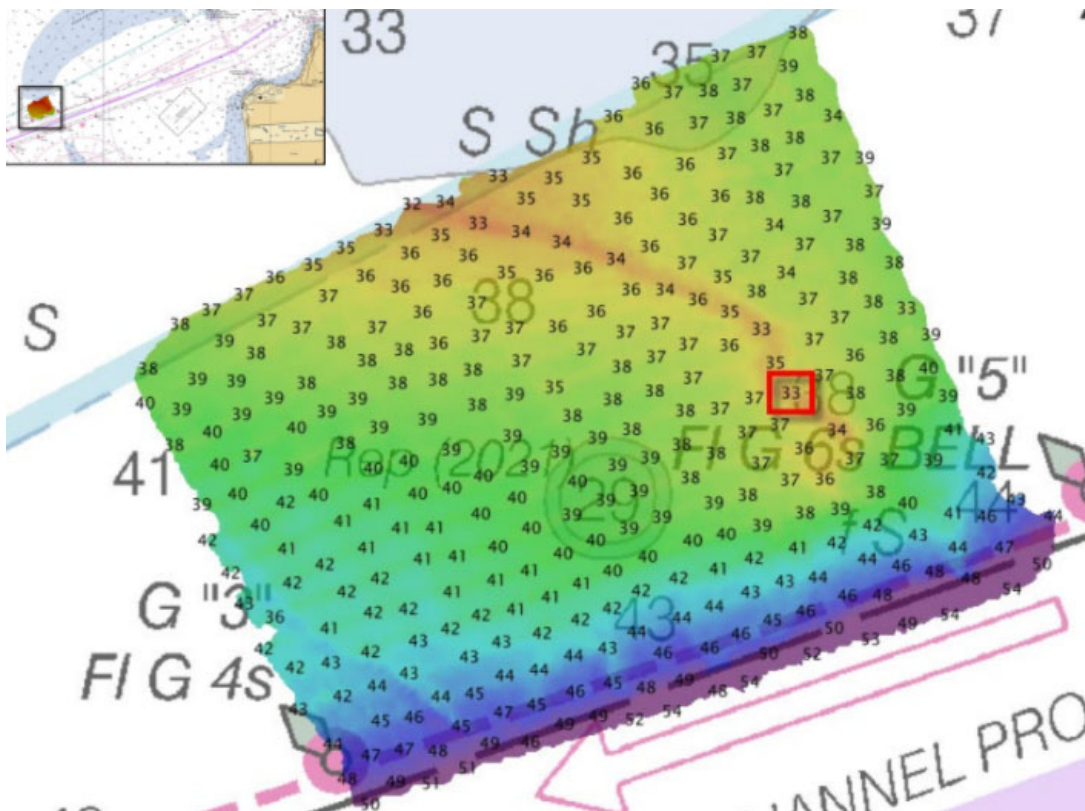


Shoaling reported

Last meeting a 29 foot shoal was reported north of the entrance channel.

The FAIRWEATHER investigated the area and did not find the shoal as reported. However, they did find a 33 foot sounding near a 38 foot charted sounding.

See image below.



NOAA Marine Debris Program updates.

October 27th is the final webinar for the [Salvaging Solutions to Abandoned and Derelict Vessel Webinar Series](#).

The past video recordings can be found on the [NOAA MDP website](#).

Oct 27 2021 - 12:00pm PDT

Salvaging Solutions: ADV Policies and Info Hub Reflections

While ADVs have long been an issue in Virginia's coastal and inland waters, a concentrated effort to address the threat they pose to public safety and to the natural environment only recently began in December 2020. This undertaking was as part of an inter-organizational effort to update the Virginia Marine Debris Reduction Plan to better align with NOAA's Mid-Atlantic Marine Debris Reduction Plan.

National Weather Service

Nothing unusual to report from NWS.

Looking at La Niña conditions developing again this winter, which means likely dryer than average

END OF REPORT

Submitted by
Jeffrey Ferguson
California Navigation Manager
NOAA's Office of Coast Survey
jeffrey.ferguson@noaa.gov



CALIFORNIA STATE LANDS COMMISSION

HARBOR SAFETY COMMITTEE MONTHLY REPORT - SEPTEMBER COMPARISON

VESSEL TRANSFERS

	Total Transfers	Total Vessels Monitored	Total Transfers Percentage
SEPTEMBER 1 - 30, 2020	191	26	13.61
SEPTEMBER 1 - 30, 2021	175	52	29.71

CRUDE OIL / PRODUCT TOTALS

	Crude Oil (D)	Crude Oil (L)	Overall Product (D)	Overall Product (L)	GRAND TOTAL
SEPTEMBER 1 - 30, 2020	11,097,423	220,000	17,448,738	5,658,890	23,107,628
SEPTEMBER 1 - 30, 2021	11,974,385	0	19,112,510	5,171,408	24,283,918

OIL SPILL TOTAL

	<u>TERMINAL</u>	<u>VESSEL</u>	<u>Total</u>	<u>Gallons Spilled</u>
SEPTEMBER 1 - 30, 2020	0	0	0	0
SEPTEMBER 1 - 30, 2021	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.