Regional Citizens' Advisory Council / "Citizens promoting environmentally safe operation of the Alyeska terminal and associated tankers."

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Subject: Recommendation for the Development and Implementation of Formal Weather Reporting Procedures When the Seal Rocks Weather Buoy (46061) is Inoperable in Prince William Sound, Alaska

Dear Commander Franklin, Mr. Doyel, Mr. Morales and Mr. Morgan;

The Prince William Sound Regional Citizens' Advisory Council (PWSRCAC) is an independent non-profit corporation whose mission is to promote environmentally safe operation of the Valdez Marine Terminal and associated tankers. Our work is guided by the Oil Pollution Act of 1990, and our contract with Alyeska Pipeline Service Company (APSC). PWSRCAC's 18 member organizations are communities in the region affected by the 1989 Exxon Valdez oil spill, as well as commercial fishing, aquaculture, Native, recreation, tourism, and environmental groups.

At our September 2018 Board of Directors meeting in Seldovia, the topic of the National Data Buoy Center (NDBC) Seal Rocks weather buoy 46061 being inoperable since May 14, 2018, was raised as an issue of critical importance. The Board expressed great concern regarding this buoy outage and the risk it presents to Prince William Sound (PWS) vessel operators and the safe transportation of oil. As a follow-up to some of the issues raised at the Board meeting, PWSRCAC staff posed a list of questions to the U.S. Coast Guard related to how the Edison Chouest Offshore (ECO) tugs conduct weather reporting when the Seal Rocks weather buoy is inoperable. The Coast Guard answered the questions that pertained to their agency, but there were other questions that fell outside of their area of responsibility and remain unanswered.

In the few months that followed, there were a number of severe weather events that raised serious concerns with the PWSRCAC regarding weather reporting when the Seal Rocks weather buoy is inoperable. These weather events resulted in the grounding of an ECO oil spill response barge, as well as the loss of an anchor and a thruster failure on a utility tug on November 12, 2018. Even more concerning than the marine casualties themselves was that they occurred while an outbound laden tanker was navigating racetrack circles just north of Montague and Hinchinbrook Islands waiting for Hinchinbrook Entrance to open. Equally concerning was that the same tanker departed the Valdez Marine Terminal 15 minutes before the Coast Guard closed Hinchinbrook Entrance, and continued outbound for approximately six hours, all while Hinchinbrook Entrance was closed.

The events that occurred on November 12, 2018, highlighted what PWSRCAC sees as a significant gap in procedures to address all aspects of the ECO tug weather reporting process when the Seal Rocks weather buoy is inoperable. We believe this gap was re-emphasized during two storms that occurred on November 24-26, 2018, and December 7, 2018. During both of these weather events, laden oil tankers departed PWS through Hinchinbrook Entrance in severe weather that was just below established Hinchinbrook Entrance closure conditions, based on weather reports provided by the ECO tugs. However, the weather forecasts and the wave heights reported by the Cape Cleare and Cape Suckling weather buoys (the two closest operational weather buoys considered by the Coast Guard when making Hinchinbrook Entrance open and closure decisions when the Seal Rocks buoy is inoperable) were above established Hinchinbrook Entrance closure conditions for wave height for almost the entire time period from 0500 to 2359 on November 25, 2018. It should also be noted that in these situations, our concerns are not focused on the ability of the tankers to safely operate in severe weather (above closure conditions), but with the risks associated with the tugs trying to make a save of a distressed tanker in these conditions.

During a November 24-26, 2018 storm, Hinchinbrook Entrance was closed for approximately 25 hours by the Coast Guard based on severe weather above closure conditions, then re-opened for 10 hours, and then re-closed for another 25 hours. During the 10-hour period that Hinchinbrook Entrance was opened, two laden tankers transited PWS and departed through Hinchinbrook Entrance into the Gulf of Alaska. PWSRCAC confirmed with APSC's Ship Escort/Response Vessel System (SERVS) that the two tankers departed their berths at 0809 and 0945 respectively, yet the first weather report conducted by an ECO tug that day following the report that opened Hinchinbrook Entrance at 0524 occurred at 1013.

Based on these times, the two tankers departed their berths 2 hours and 4 minutes (for the tanker that departed at 0809), and 28 minutes (for the tanker that departed at 0945) before knowing what the weather conditions were or the status of Hinchinbrook Entrance at those departure times. PWSRCAC researched the weather data for wind and wave heights reported by the Cape Cleare and Cape Suckling weather buoys between 0500 and 2359 on November 25, 2018, and both showed wind and wave height conditions worsening. Specifically, the 1500, 1600, and 1700 readings showed wave heights between 18 and 20 feet. These times coincide with the times the two tankers were transiting through Hinchinbrook Entrance and into the Gulf of Alaska.

PWSRCAC is also concerned about the inconsistency introduced into the weather reporting being conducted by the ECO tugs. For example, the six wave-height reports that that were provided to the Coast Guard between 1013 and 1500 on November 25, 2018,

were provided in a range of 12-14 feet (just below closure conditions), followed by the 1529 reading that reported wave height at 15 feet (this reading closed Hinchinbrook Entrance), and the 1600 weather report provided by the ECO tug that reported wave height at 18 feet.

On December 7, 2018, another storm impacted PWS and the Gulf of Alaska where the forecasted weather was worsening from the time a laden tanker was scheduled to depart Berth 4 at 0300 on December 7, 2018, and continued to worsen the entire day. PWSRCAC requested the weather report information the Coast Guard received from the ECO tugs that was used in the decision of whether to open or close Hinchinbrook Entrance that day, but have not received that information yet. PWSRCAC again researched the weather data for wind and wave heights reported by the Cape Cleare and Cape Suckling weather buoys between 0000 and 1600 on December 7, 2018, and both showed wind and wave height conditions worsening all day on December 7. Specifically, wave heights ranged from 16 to 23 feet at Cape Cleare and 14 to 21 feet at Cape Suckling, with all but three readings for wave height above established Hinchinbrook Entrance closure conditions for the entire day.

It should be noted that as a result of the hard work and coordination of the Coast Guard and NDBC, the Seal Rocks weather buoy was replaced and put back into service on December 12, 2018. However, based on the harsh weather conditions this buoy is exposed to regularly and the history of outages not only for this buoy but for many of the NDBC weather buoys in Alaska, it is inevitable that the Seal Rocks weather buoy will experience some sort of outage or reduced reporting condition in the future.

The recent Seal Rocks buoy outage that lasted for almost seven months highlights the fact that the coordination and logistics involved in repairing these NDBC weather buoys takes a significant amount of time and resources. These buoys are one of the primary sources of weather data relied upon by oil tankers transiting PWS and by spill responders operating in this vast, dynamic, and remote body of water. Specifically, the Seal Rocks Station 46061 is one of the tools the Coast Guard uses to determine if closure conditions (the point at which outbound laden tankers are no longer allowed to pass out of PWS) exist at Hinchinbrook Entrance.

Based on all of the information provided in this letter, PWSRCAC recommends that the Coast Guard and Alaska Department of Environmental Conservation work with APSC/SERVS, the shippers, and PWSRCAC to develop and implement clear, consistent, and written procedures for the ECO tug crews to follow when conducting and communicating weather reports when the Seal Rocks weather buoy is inoperable.

PWSRCAC recommends these weather reporting procedures:

1. Clearly establish protocols that identify who is responsible for taking the weather reports (e.g., which tug crewmembers and their experience, qualifications, and training, etc.).
2. Clearly establish what specific weather information is being reported and in what format. Wind speed (e.g., sustained or gusting), wind direction, and wave height (e.g., provided in feet or meters, as a single value or a range [e.g., 10 feet or 12-14 feet], etc.).
3. Clearly establish that reports will be taken from a location at or near the Seal Rocks weather buoy.
4. Clearly establish a location on the tug boat where the wave height readings will be taken to maximize accuracy and consistency.

5. Clearly establish weather reporting communications protocols to ensure that those who need the information receive it in adequate time to make critical navigation safety decisions (e.g., Coast Guard, APSC/SERVS, tanker Master, Pilots, etc.).
6. Clearly establish other weather data sources considered by the Coast Guard in addition to the ECO tug reports when making Hinchinbrook Entrance open/closure decisions (e.g., Cape Cleare and Cape Suckling weather data, weather reports from other vessels in the area, other weather forecast information, etc.). Clearly establish how much weight or emphasis the Coast Guard places on these other sources when making the same decisions?
7. Clearly establish when weather reports are required based on forecasted weather conditions and the status of Hinchinbrook Entrance (e.g., when Hinchinbrook Entrance is closed and a tanker is scheduled to depart, when the Entrance is open, but weather forecasts are worsening and a tanker is scheduled to depart, etc.).
8. Clearly establish who is responsible for requesting a weather report be conducted by the ECO tug (e.g., APSC/SERVS, tanker company, Pilot, Coast Guard, etc.).

The importance of the NDBC weather buoys to the waterway users of PWS and the Gulf of Alaska cannot be overstated. Therefore, as a future recommendation, PWSRCAC advocates for the establishment of a task force that includes members from all agencies and stakeholders with roles, responsibilities, or vested interests in maintaining the operability of these NDBC weather buoys. This task force could take a holistic look at these weather buoys in an effort to determine optimal location, need for additional buoys, contingencies for short-term and prolonged outages, and other related issues to improve the accessibility and accuracy of this weather reporting system on which we all critically rely.

Thank you for considering our recommendations that we see as a critical improvement needed to better protect the safety of the tug and tanker crews called upon to operate in severe weather conditions, and to ensure the safe transportation of oil in Prince William Sound and the Gulf of Alaska. Please contact us if we can assist in any way or if we can provide you with further information on this subject. We would appreciate receiving a response regarding the recommendations contained in this letter.

Sincerely,

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Executive Director

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