

NOTE: Emails and phone numbers have been removed.

From: **Richard Steiner**

Date: Mon, May 12, 2014 at 3:36 PM

Subject: Re: Maritime Operations and Safety

To: "Vogt, Anthony J CAPT", "Ostebo, Thomas RADM"

Capt. Vogt (and Admiral Ostebo),

Thank you very much for your May 9 response to my April 21 request re: disabled ship rescue capability on the Arctic shipping routes this season. I commend the Coast Guard for Operation Arctic Shield 2014.

Below I will offer a few respectful observations and recommendations for your consideration, and will be present to make these at your Open House listening session in Anchorage tomorrow afternoon as formal public comment, if there is such an opportunity. I trust you will incorporate these into the public record re: the Shipping Safety Partnership's concerns regarding Arctic shipping risk this summer.

From your May 9 response, I am left to conclude the following re: my specific questions.

1. 4-21 Question: What contingency plan does the Coast Guard have in place to rescue a ship disabled sailing the Northern Sea Route (NSR), or other Arctic maritime traffic, through the Chukchi Sea, Beaufort Sea, Bering Strait, and Bering Sea during this summer's ice-free shipping season. This Arctic disabled ship rescue plan would identify rescue tug assets with sufficient open ocean tow gear and engine power to render a save to the growing fleet of merchant ships sailing the NSR each summer, where they are located, and what their response time would be for various vessel casualties. The plan should also identify what training drills these rescue assets will undergo before the shipping season commences, and potential ports of refuge along the route. As you know, each of these ship transits, which are mostly foreign vessels on "Innocent Passage," endangers U.S. and Alaska marine resources, as well as the lives of mariners aboard and rescuers.

5-9 Answer: I am left to conclude that no such ship rescue contingency plan exists as yet.

Recommendation: I would respectfully suggest the urgent development of such a plan, to be implemented on an expedited basis, by July 1. While USCG cutters may be in the area, they would not be capable of rendering a save to a fully laden petroleum product tanker sailing the route, in many sea states. Thus, part of the contingency plan should include the charter of a **fully capable, ocean rescue tug to be on station at Port Clarence**, to escort laden ships transiting the southern Chukchi, Bering Strait, and Northern Bering Sea region this summer; and to be available to rescue such vessels if they become disabled for any reason. The funds for such a rescue tug charter should be available through the federal Oil Spill Liability Trust Fund (OSLTF).

2. 4-12 Question: Will each of these vessel transits be tracked continuously while in, or near, U.S. waters.

5-9 Answer: I am left to conclude that these ships will not be tracked in real time, 24/7, while transiting the region.

Recommendation: I recommend that all ships transiting the Arctic routes be continuously tracked, such as a Vessel Traffic System (VTS) would provide.

3. 4-12 Question: What the protocol will be for reporting/investigating any anomaly in the tracked transit of these ships.

5-9 Answer: I am left to conclude that no such protocol has been agreed between the ship owners and the USCG.

Recommendation: I recommend that the USCG develop such a protocol, requiring immediate notification of any transit anomalies, particularly those that could lead to a vessel casualty.

4. 4-12 Question: Are there voluntary routing agreements in place keeping these ships as far from shore as possible.

5-9 Answer: The Coast Guard is in the process of completing a Port Access Routing Study for the Bering Strait to examine the need for additional vessel routing measures. But no such routing agreements exist at present.

Recommendation: I applaud the PARS study, and encourage the USCG to expedite the development of voluntary routing agreements with all shippers transiting the Arctic region, to minimize risk in the region.

5. 4-12 Question: What is the extent to which the Coast Guard will know the cargos hauled on the NSR prior to sailing, so as to identify hazardous cargos (e.g. petroleum products) before entering the area.

5-9 Answer: I am left to conclude that the USCG will have no prior knowledge of what cargos are to be hauled through the region, particularly on foreign flagged vessels on "innocent passage."

Recommendation: I recommend that the USCG develop a pre-sailing notification system whereby you will be informed what ships intend to sail the Arctic routes (in particular the NSR to Asia route), what cargos are on board (particularly hazardous cargos), what their sailing schedule will be (in particular when they expect to arrive off the north coast of Alaska), will they be escorted, and what tow equipment they have on board. As you well know, the response scenario for a condensate spill is significantly different than for a crude oil spill. Further, I would recommend that the USCG be notified of any/all vessel arrivals off the north coast of Alaska at least 1 day prior to arrival in the region, so that the chartered rescue tug can meet the arrival for escort.

If any of my conclusions are not accurate, I will appreciate your corrections.

I will look forward to making these points at your Anchorage open house tomorrow afternoon.

Respectfully,

Rick Steiner, Professor
Facilitator, Shipping Safety Partnership
Oasis Earth
Anchorage, AK

On Fri, May 9, 2014 at 9:53 AM, Vogt, Anthony J CAPT wrote:
Professor Steiner,

Good morning! I'm contacting you on behalf of Admiral Ostebo who is currently on the east coast attending to personal and professional matters. Thank you very much for your questions about Coast Guard operations and maritime safety planning in the Arctic region. I hope the following comments and references to existing policy and plans address the many issues you bring to our attention. Feel free to relay this information to your contacts in the Alaska news media and let them know that we'd be happy to speak with them directly. Please have them reach out to our D17 Public Affairs Officer, LT Veronica Colbath, at *****.

I am pleased to let you know that as the nation's lead federal agency for ensuring maritime safety and security in the Arctic, the Coast Guard will perform its statutory missions to ensure the Arctic remains a

safe, secure and environmentally protected region. The extreme environment and limited infrastructure create unique logistical challenges when conducting operations in the Arctic. To overcome these challenges, Coast Guard personnel are working closely with international, federal, state, local and tribal partners and industry to ensure the protection of our nation's Arctic interests.

The Coast Guard is committed to having a presence in the Arctic and kicked off Operation Arctic Shield 2014 in January.

The objectives for Arctic Shield 2014 are to –

1. Seasonally perform select Coast Guard missions and activities in the Arctic.
2. Advance Arctic maritime domain awareness through operations, intelligence and partnerships.
3. Improve preparedness and response capabilities.
4. Test capabilities and refine Arctic resources requirements.

As part of Operation Arctic Shield 2014, the Coast Guard will operate in the region from July-October with cutters, aircraft, and personnel. All will engage in operations encompassing a variety of Coast Guard missions. The Coast Guard will leverage its partnerships and combine efforts to ensure the safety of the maritime community. Operating in the Arctic will also give us an opportunity to exercise our capabilities to ensure we have the right resources for our maritime operations.

I invite you to review the below resources to address some of your specific questions concerning maritime operations and safety:

The Agreement of Cooperation on Aeronautical and Maritime Search and Rescue in the Arctic.

The Alaska Federal and State Preparedness Plan for Response to Oil and Hazardous Substance Discharges and Releases (The Unified Plan) and Subarea Contingency Plans, Alaska Regional Response Team.

The U.S. Coast Guard Arctic Strategy.

The draft environmental assessment for Coast Guard operations in the Arctic on the D17 website: www.uscg.mil/d17. We are conducting related open house forums this month in several communities and would welcome your attendance and comments at any or all.

Coast Pilot, Volume 9, includes navigation safety information for northwestern Alaskan waters. This includes waypoints for routes between Unimak Pass and Arctic ports such as Point Hope and Barrow. The Coast Guard is also in the process of completing a Port Access Routing Study for the Bering Strait to examine the need for additional vessel routing measures.

Thanks again for your questions and concerns. We are certainly aligned in striving to assure the maritime safety, security and stewardship of the Arctic and Alaskan waterways.

Respectfully,

CAPT Jack Vogt
USCG District Seventeen
Chief of Staff

-----Original Message-----

From: Richard Steiner

Sent: Wednesday, May 07, 2014 08:07 PM Eastern Standard Time

To: Ostebo, Thomas P RADM

Subject: Re: Ship rescue contingency plan for Arctic ship traffic this summer

Admiral Ostebo,

With regard to my 4-21 email to you (below), to which you have not yet replied, I will thus assume that the US Coast Guard has no rescue / response plan regarding disabled ships sailing Arctic routes this summer.

Again, if you do, I would enjoy hearing the plan and assets available.

FYI, I am copying this correspondence to the Alaska news media.

Regards,

Rick Steiner
Shipping Safety Partnership
Anchorage

On Mon, Apr 21, 2014 at 5:46 PM, Richard Steiner wrote:

Dear Admiral,

First of all, congratulations on your new assignment/promotion, well deserved. I look forward to working with Admiral Abel upon his assumption of command.

For now, I would greatly appreciate hearing from you regarding what contingency plan the Coast Guard has in place to rescue a ship disabled sailing the Northern Sea Route (NSR), or other Arctic maritime traffic, through the Chukchi Sea, Beaufort Sea, Bering Strait, and Bering Sea during this summer's ice-free shipping season.

This Arctic disabled ship rescue plan would identify rescue tug assets with sufficient open ocean tow gear and engine power to render a save to the growing fleet of merchant ships sailing the NSR each summer, where they are located, and what their response time would be for various vessel casualties.

The plan should also identify what training drills these rescue assets will undergo before the shipping season commences, and potential ports of refuge along the route. As you know, each of these ship transits, which are mostly foreign vessels on "Innocent Passage," endangers U.S. and Alaska marine resources, as well as the lives of mariners aboard and rescuers.

As well, I would appreciate knowing:

1. if each of these vessel transits will be tracked continuously while in, or near, U.S. waters;
2. what the protocol will be for reporting / investigating any anomaly in the tracked transit
3. if there are voluntary routing agreements in place keeping these ships as far from shore as possible; and
4. the extent to which the Coast Guard will know the cargos hauled on the NSR prior to sailing, so as to identify hazardous cargos before entering our areas of concern.

Thanks as always for your attention to this request, and again, congratulations on your new posting.

Regards,

Rick Steiner, Professor

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