



BY EMAIL

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March 1, 2023

Commander, Coast Guard Pacific Area (PAC-5)  
Attn: Mr. Stephen Danscuk / Preventions  
Coast Guard Island Bldg. 51-5  
Alameda, CA 94501

Subject: Navigation Bridge Visibility

Dear Commander:

The Columbia River Pilots Association and the San Francisco Bar Pilots Association have each been asked to accept stowing arrangements for vessels carrying wind turbine components that severely restrict visibility from the navigation bridge. After a careful review, both Associations have concluded that the proposed configurations are unsafe for navigation on their respective pilotage grounds. This letter, in which the Puget Sound Pilots joins, asks the Coast Guard to strictly enforce the applicable visibility regulations.

We are seeing an increasing number of vessels with wind turbine component stowage arrangements that do not meet SOLAS visibility requirements, with little to no forward visibility from the navigation bridge. It has been suggested that piloting these vessels is no different than piloting vessels in weather induced restricted visibility. Not true. As pilots, we do move ships in weather induced restricted visibility. That is part of the job. These situations usually arise when a vessel is underway and the degradation in visibility is not forecast. In those situations, the pilot must minimize the inherent risks. However, if vessels are safely moored or anchored when such conditions present themselves, the way to minimize risk is to postpone the vessel movement until visibility improves. Further, other waterway users and non-commercial traffic during times of weather-induced visibility restrictions generally decreases, reducing the potential for incidents.

Intentional visibility restrictions are different. Rather than presenting a transient condition, cargo-restricted visibility is a controllable condition that persists for the entire voyage.

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Moreover, in addition to blocking views forward, the cargo can also negatively influence radar pictures by increasing shadow sectors and/or echo scattering.

Moving these non-compliant vessels within confined pilotage grounds seriously compromises the safety of the vessel, the public, and the environment. While operators of these vessels have offered to install video cameras, employ escort vessels, and increase the number of pilots onboard, we do not believe these options, even taken together, are adequate to safely navigate vessels within our pilotage grounds. Reducing a three-dimensional world to a TV screen removes valuable information and an escort vessel simply clears the way, it does not replace lost visibility. While adding pilots to a bridge with no visibility will provide some respite, it does not improve visibility from the bridge; both pilots still cannot see. Relying on external inputs is occasionally necessary however it should not be allowed to become the norm as safety would be compromised. There is no substitute for a pilot's eye.

The applicable regulations regarding visibility requirements for vessels of more than 1600 tons that apply to all vessels arriving or departing US ports are 33 CFR 164.15 and SOLAS Chapter V, Regulation 22. SOLAS allows for exemptions based upon opinion from the vessel's flag state. However, these exemptions are for vessels of unconventional design and the exemption requires arrangements to achieve visibility as near as practicable to the regulations. The vessels proposing these stowage plans are not an unconventional design, they are conventional vessels carrying a cargo they are not designed to carry. Other vessel types (i.e., forward house) would be much more suited to this type of cargo.

Visibility regulations should be uniformly enforced, and their uniform enforcement should be known to the operators before they contract to carry, before they load their vessels, and before they arrive at the pilotage ground. Although pilots are authorized to refuse a vessel due to safety concerns, that refusal is made contemporaneously with the vessels port call. Refusing pilotage to a vessel operating with severely restricted visibility under a flag-state letter of dispensation imposes severe costs and no clear solution.

Pilots are not regulators and we view this matter to be regulatory in nature, not a vessel specific safety concern. While we appreciate MSIB 01-22 that was published to address the reduced visibility due to overloading wind turbine parts we have seen the practice continue and therefore strongly urge the Coast Guard to take the necessary action to inform operators of wind turbine vessels that the Coast Guard intends fully to enforce visibility regulations.

Thank you for your consideration.

Sincerely,

Columbia River Pilots Association  
Puget Sound Pilots  
San Francisco Bar Pilots

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Copy (by email):

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Lower Columbia River Harbor Safety Committee  
Oregon Board of Maritime Pilots  
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