

Exh. MM-50  
Docket TP-220513  
Witness: Michael Moore

**BEFORE THE STATE OF WASHINGTON  
UTILITIES AND TRANSPORTATION COMMISSION**

WASHINGTON UTILITIES AND  
TRANSPORTATION COMMISSION,

Complainant,

v.

PUGET SOUND PILOTS,

Respondent.

Docket No. TP-220513

**EXHIBIT TO TESTIMONY OF**

**Captain Michael Moore**

**ON BEHALF OF**

**PACIFIC MERCHANT SHIPPING ASSOCIATION**

**Letter, Oil Spill Prevention and Response Questions: Answers Coast Guard  
Sector Seattle (2008)**

**FEBRUARY 10, 2023**

U.S. Department of  
Homeland Security

United States  
Coast Guard



Commander  
United States Coast Guard  
Sector Seattle  
<http://www.uscg.mil/d13/units/msopuget>

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AUG 5 2008

Pacific Merchant Shipping Association  
Captain Michael R. Moore  
Vice President  
World Trade Center  
2200 Alaskan Way, Suite 160  
Seattle, Washington 98121

Dear Captain Moore:

Thank you for your letter of July 17, 2008, requesting further information on Coast Guard safety, environmental and security prevention and response activities for Puget Sound. Please see the attached response, which answers each of your questions.

The Coast Guard is strongly committed to ensuring that Puget Sound and coastal Washington waters remain as safe and environmentally healthy as possible. Our multi-mission capability allows us to maximize our ability to achieve that goal, and we have leveraged our increased port security mission to increase our awareness of and responses to potential threats to Puget Sound. I consider the Coast Guard's programs an excellent example of the best stewardship of our citizen's expectations, and of their funding.

The Puget Sound area and Washington state merit the very best in preventive strategies, and I am proud of the efforts of the Puget Sound community in general, and Sector Seattle specifically, in working cooperatively and effectively to reduce the threats to the safety, security and environmental health of Puget Sound. Although our work must remain continuous, our combined efforts continue to improve, and we enjoy a strong spirit of collaboration and effectiveness.

Should you have additional questions, please contact Mr. John Dwyer of my staff at 206-217-6184.

Sincerely,

A handwritten signature in black ink, appearing to read "S. P. Metruck".

S. P. METRUCK  
Captain, U. S. Coast Guard  
Captain of the Port, Puget Sound  
Officer in Charge, Marine Inspection  
Federal Maritime Security Coordinator

Encl: Oil Spill Prevention and Response answers

## Oil Spill Prevention and Response Questions: Answers Coast Guard Sector Seattle

### Port State Control Vessel Inspection Program (Foreign Vessels)

1. Does the Port State Control foreign vessel targeting matrix continue to identify high risk vessels? *Yes. We use this matrix daily to screen every vessel that is scheduled to arrive in Puget Sound, and to determine what measures to implement to ensure the safety of Puget Sound. For example, based on the information presented, we may prevent a vessel from entering the Sound until repairs are conducted, or require additional precautionary methods such as tug escorts or daytime only transits, or even prevent the vessel from entering our waters. We also use the matrix to determine our inspection priorities, and where those inspections will take place. For vessels with significant problems, we may not allow them to proceed east of Port Angeles until they have satisfactorily completed a Coast Guard inspection.*

2. Is the targeting matrix being modified with new information over time to better target risk and inspection resources? *Yes, a key feature of the matrix is that it is continually modified to address results of all vessel boardings and Coast Guard vessel control actions. The matrix is upgraded daily to show vessels of concern, whether from safety, security or environmental threats. We then optimize our inspection team schedules to ensure that we always identify and inspect the highest risk vessels, while still covering all of our normal routine inspections.*

3. Are the examinations conducted by qualified Port State Control Officers (PSCOs)? *Yes. We do not allow foreign vessel inspections to be completed except by qualified PSCOs. We have a rigorous training and qualification program that we follow to develop PSCOs and marine inspectors. The qualification program is regularly updated to ensure that PSCOs meet current standards.*

4. Are all high risk foreign vessels being examined by Sector Seattle? If not, why not? *Yes, for safety, security and environmental high risks. If required inspections cannot be performed at the time requested due to schedule conflicts, we delay the vessel accordingly, until our resources are available.*

5. Does Sector Seattle board and exam other than high risk/priority vessels? If so, to what degree? *Yes, we conduct additional boardings/examinations based on Coast Guard and International Maritime Organization (IMO) standards and schedules. We also board vessels based on local priorities/concerns. Finally, we are required to perform random examinations to provide additional oversight of vessels entering U.S. waters.*

6. Do detention rates related to significant oil spill threats continue to show decreasing risk since the full implementation of the Port State Control program? *Yes, detention rates continue to decline. Our inspection program has provided a strong focus on environmental threats, with resultant enforcement emphasis on preventing accidental or intentional discharges. The Coast Guard nationally and in the Pacific Northwest have worked with the U. S. Attorneys to create a number of significant criminal sanctions against vessel operators who have been found to have been negligent in spilling oil.*

7. Have marine security missions led to more vessel boardings and capabilities or less? *More. We now board vessels due to their security profile, as well as for safety and/or environmental verification. Our boarding rate has increased as a result. We use our multi-mission capability to perform several functions at one time, checking for safety and environmental threats while also performing security boardings. For example, our Vessel Boarding and Search Team (VBST), a new capability added since 9/11, performs random and targeted security boardings, in addition to those required under our Port State Control program. The VBST boardings also check for safety and environmental threats.*

**Authority: Administrative Orders, Captain of the Port Orders, Enforcement**

1. Is Sector Seattle continuing to use Administrative Orders or Captain of the Port Orders to address oil spill threats and marine safety concerns? *Yes, we use these tools frequently to ensure vessel and facility operations are conducted safely. We have issued 47 such orders in Calendar Year 2008.*
2. Have such orders included anchoring, operational or tug escort requirements? *Yes. For example, we use COTP orders to require vessels with propulsion problems to anchor, maintain a standby tug, conduct repairs, and have the vessel's classification society ensure the success of the repairs.*
3. How many tug escort or tug standby requirements involved making up to a drifting deep draft cargo vessel or tanker before it drifted aground? *We have not had a drifting tanker in recent memory (since circa 1989). We have responded to several deep draft cargo ships over the last 20 years that temporarily lost power; none ran aground.*
4. Have you been limited by inadequate authority or operational capabilities to issue such orders or to otherwise ensure compliance with marine safety and oil spill prevention/response requirements? *No, we have full authority to ensure compliance. In addition, our operational capabilities have actually increased, due to organizational improvements such as the Sector construct, where several independent units were combined into one command to improve efficiencies, enabling greater multi-mission ability. Also, we have an increased presence on the water due to additional security efforts, and increased interaction with facility and vessel operators due to our Area Maritime Security Committee program, where we can use that interaction to also address environmental concerns.*

**Domestic Vessel Inspection**

1. Are 100% of vessels requiring a Coast Guard Certificate of Inspection being inspected? *Yes. Our standards and performance measures for this program remain consistent with very long standing program requirements. We inspect vessels in all stages of construction, repair and operation.*
2. Are the inspections being done by qualified marine inspectors? *Yes. We are prohibited internally from using unqualified inspectors to complete inspections. Our marine inspector training program at Sector Seattle is considered a model for the rest of the Coast Guard, and we are anticipating further growth in our inspector training program with added civilian and military marine inspector billets.*

### **Vessel Traffic Service**

1. Does Sector Seattle continue to maintain 24/7 vessel traffic service throughout the Puget Sound system and Strait of Juan de Fuca? *Yes. Our traffic monitoring and direction abilities continue to improve, with enhanced "daylight" type radars that offer improved viewing, Automatic Identification System (AIS) information that presents vessel identification, course and heading data, increased video camera capabilities, and incorporation within the Sector Seattle organization, which integrates the VTS with our JHOC.*

2. Is Sector Seattle continuing to coordinate vessel traffic services with Canada in our joint waters to provide complete area coverage? *Yes. We meet frequently with the Canadian Coast Guard, and continue to enhance our relationship and joint execution. We also use this relationship to develop common responses to vessel incidents, so that the mariner sees similar response actions regardless of which country's waters the vessel is in.*

3. How have vessel tracking and VTS capabilities improved over the last 10 years? *We have upgraded our radar systems and coverage, with a new VTS center established in 2005. We also have local and longer range AIS coverage, that identifies vessels locally and while still offshore, that corroborates/augments our VTS coverage. Our TV cameras have also been improved, so that we have zoom and directional viewing control at many of our busiest anchorages.*

### **Operations Center and Technology**

1. How has the new Operations Center and technology changed the ability to manage maritime sector risk, implement oil spill prevention programs and ensure appropriate oil spill response? *We now have an enhanced integrative capability, which incorporates GIS, video, radar, AIS and other technologies into one center, co-located with the VTS. This site includes staffing of Navy personnel, and integrates multiple partners, such as the Customs and Border Protection, the State Patrol, the Port of Seattle, NOAA, other Coast Guard units, etc. This Operations Center is widely considered to be a national model. Because of this commonality of control and information, our response are quicker and more effective, and we are able to make use of a much wider array of resources.*

2. How has the new Operations Center and technologies changed field operations? *We are able to track all Coast Guard and many other governmental assets, enhancing our response posture. We also have improved visibility of commercial vessel and full integration of our VTS with response and prevention personnel. For example, if a heavy weather is forecast, we put out an alert to all operators and facilities, request tug companies assume a high readiness posture, establish operating restrictions for oil bunkering/ transfer operations and set additional anchor watch requirements for vessels, increase monitoring of the anchorages with radar track circles and video monitoring, and then direct response activities such as re-anchoring and tug assists if needed. All of these actions are now coordinated through one location at Sector Seattle.*

## **Oil Spill Prevention and Response Questions Coast Guard Sector Seattle**

### **Oil Handling Facility Inspections**

1. Does Sector Seattle continue to inspect all oil handling facilities capable of

transferring more than 250 barrels of oil? *Yes. In fact, these inspections have increased, because we ensure that we address safety and environmental concerns when we do security examinations.*

2. Does Sector Seattle inspect and/or work with other waterfront facilities including marinas to focus on the prevention of oil spills? *Yes, we have outreach programs with marinas that stress pollution prevention. Our Coast Guard Auxiliary members are assigned geographical areas of responsibility for marinas to promote pollution prevention, fire safety, and security awareness.*

3. Does Sector Seattle continue to target and monitor oil transfers to better ensure compliance and prevent spills? *Yes. These transfer monitors are conducted both during the week and on weekends. We have also worked with the Puget Sound Harbor Safety Committee to develop improved standards of care for vessel bunkering and lightering. We share oil transfer monitors status with the Department of Ecology.*

### **Oil Spill Response and Preparedness**

1. Does Sector Seattle ensure that all reports of pollution are investigated and appropriately responded to? *Yes. We not only respond using Coast Guard assets, we have developed a network of local responders such as Coast Guard Auxiliary members, local law enforcement, WSP aviation assets and other contacts to provide quick assessments of spill reports. We mandate cleanup actions as needed, and "Federalize" (assume responsibility for) cleanup actions if the responsible party cannot or will not clean up the spill.*

2. Does Sector Seattle continue to require and participate in oil spill exercises and drills? *Yes. We are a strong participant in the Regional Response Team/Northwest Area Committee that oversees oil spill response in the Pacific Northwest. We regularly join with facilities when they comply with their spill exercise requirements by performing oil spill drills. We also recently (May 2008) concluded a significant national level oil spill exercise on the Washington Coast that involved a wide array of government and industry organizations to address a large oil spill from a vessel off the coast. In addition, we regularly work with local facility operators to ensure they have properly incorporated spill response capabilities within their facility response plans.*

3. Are resources continuing to be used to assess and improve oil spill preparedness and response and contingency plans? *Yes. This is done for waterfront facilities, and for vessel operators. For example, we recently reviewed all waterfront facility plans to ensure they continue to meet the response time frames for their contracted oil spill response organizations. Also, the Coast Guard is increasing formal enforcement of the non-tank vessel response plans program.*

### **Partnerships and Outreach**

1. Is Sector Seattle continuing to outreach and partner with federal, state and local agencies and other key stakeholder groups to improve marine safety and oil spill prevention/response? *Yes, we regularly meet with a wide variety of port partners, including the Department of Ecology, the Oil Spill Advisory Committee, the Northwest Area Committee, the Regional Response Team, the Puget Sound Harbor Safety Committee and others to boost prevention and response activities.*

2. Does this activity help to focus continuous improvement efforts and more efficient use of resources? *Yes. The relationships developed here provide the basis for continuous improvement. For example, within the Puget Sound Harbor Safety Committee, we recently sponsored a joint government/industry revision of the standard of care for vessel bunkering, that will further improve the safety and spill prevention performance of this activity. In addition, we have joined with the Department of Ecology to use one website for notification and tracking of vessel oil transfers.*

### **Outcomes – Vessel Activity and Oil Spill Data**

1. Does vessel arrival data continue to show a relatively consistent number of arriving deep draft commercial vessels annually despite cargo and passenger through put increases over the years? *Generally yes. There have been some variations in the types of vessels arriving, such as increased cruise ship traffic and more recently increased grain ship traffic.*

2. With cargo vessel fleets upgrading, are you finding newer cargo vessels with double hulled fuel tanks, enhanced navigation equipment and better engine room controls? *Yes. We have seen more protectively located fuel tanks, enhanced navigation equipment (including AIS), and improved automation controls.*

3. Does Sector Seattle oil spill data continue to show a very small percentage of oil spills and oil spill volumes entering marine waters to be coming from deep draft cargo carrying vessels? *Yes. The great majority of vessel spills come from small craft, such as fishing vessels and recreational vessels. However, most of the oil spills entering Puget Sound come from street and storm drain runoff.*