

THE IMPORTANCE OF MAINTAINING THE PRINCE WILLIAM SOUND TANKER ESCORT SYSTEM

- The Prince William Sound tanker escort system is one of the most significant prevention programs in place to prevent oil spills from laden tankers transiting Prince William Sound (PWS).
- Laden oil tankers are escorted by two high-powered tugs, in varying configurations, from the time they leave the dock at the Valdez Marine Terminal (VMT) until the tanker has transited safely into the Gulf of Alaska.
- The Oil Pollution Act of 1990 (OPA 90) mandates that “single hulled tankers over 5,000 gross tons transporting oil in bulk shall be escorted by at least two towing vessels” as they travel through PWS.
- The Vessel Escort and Response Plan (VERP), which was developed by the PWS tanker owners, and approved by the Coast Guard as the plan of operations for the PWS escort vessels, requires escorts for both single and double hull tankers. However, there are currently no federal or state requirements to continue this practice for double hull tankers.
- Federal law calls for the phase out of all single hulled oil tankers trading at US ports by 2010, and the phase out of older double bottomed vessels by 2015. According to industry estimates, the Trans-Alaska Pipeline Service (TAPS) tanker fleet will be comprised of 100% double-hulled vessels by as early as 2007.
- The PWS escort system operates on the basis of several different zones that require different escort vessel configurations and capabilities based on navigational considerations and other risk factors (Figures 1-4). The normal escort procedures for laden tankers (inbound or outbound) specify that **at least two** escort vessels must be assigned to each laden tanker transiting the Sound.
- The U.S. Coast Guard estimates that nearly 85% of oil spills and marine accidents can be attributed to human factors – either individual errors or organizational failures.
- Technological improvements such as double hulls can reduce the severity of an oil spill caused by grounding, collision, or allision, but they cannot interrupt the chain of events that may cause the accident to occur in the first place.

- As national attention is increasingly focused on issues of port security, it is important to recognize the value of the PWS tanker escort system as a security measure.
- The only way to ensure the continued operation of the PWS escort system is through a legal or regulatory imperative. It is essential that such a directive specify that the system continue to operate in its current state with two escort vessels assigned to each laden tanker in varying configurations depending upon location in PWS.
- There are several potential legal or regulatory mechanisms for continuing the current PWS tanker escort system, including:
 - (a) The U.S. Coast Guard could develop new regulations or amend existing regulations at 33 CFR 168 to specify that the two escort system in PWS applies to double hulled and redundant tankers as well as single hulled vessels;
 - (b) The State of Alaska could also develop such a requirement through the rulemaking authority of the Department of Environmental Conservation; and
 - (c) Until a regulatory solution is implemented, the Coast Guard may implement a Regulated Navigation Area that requires the escort system to operate in its current configuration, or he could develop a COTP directive that requires each individual tanker operator to continue to comply with the escort system as currently configured.

Official PWSRCAC Position:

“Maintaining a strong and reliable escort fleet and preserving the practice of requiring two escorts for laden tanker transits is essential to the safe transportation of oil in Prince William Sound. As the TAPS tanker fleet composition moves toward full compliance with the Oil Prevention Act of 1990 double hull requirements, the risk of another major tanker spill to the waters of Prince William Sound will decrease. But it would be dangerous and imprudent to allow these improvements in vessel engineering to replace proven prevention programs that have been implemented in the years since the *Exxon Valdez* spill.

“The Prince William Sound tanker escort system safeguards against oil spills caused by navigational errors, severe weather, and human or organizational failure. The Prince William Sound Regional Citizens’ Advisory Council, as part of its mission to promote the environmentally safe operation of the Alyeska Pipeline marine terminal in Valdez and the oil tankers that use it, supports the continued operation of the PWS tanker escort program in the configuration described in the 2001 Vessel Escort and Response Plan, whereby two escorts stay in close configuration through northern Prince William Sound with the primary escort tethered through Valdez Narrows; one close escort and a sentinel are assigned through Central Prince William Sound; two close escorts are maintained through Hinchinbrook Entrance; and a sentinel is stationed until a laden tanker reaches a distance of 17 miles seaward of Cape Hinchinbrook.”

Figure 1 Prince William Sound Tanker Escort System Three Zones:

- Northern PWS
- Central PWS
- Hinchinbrook Entrance

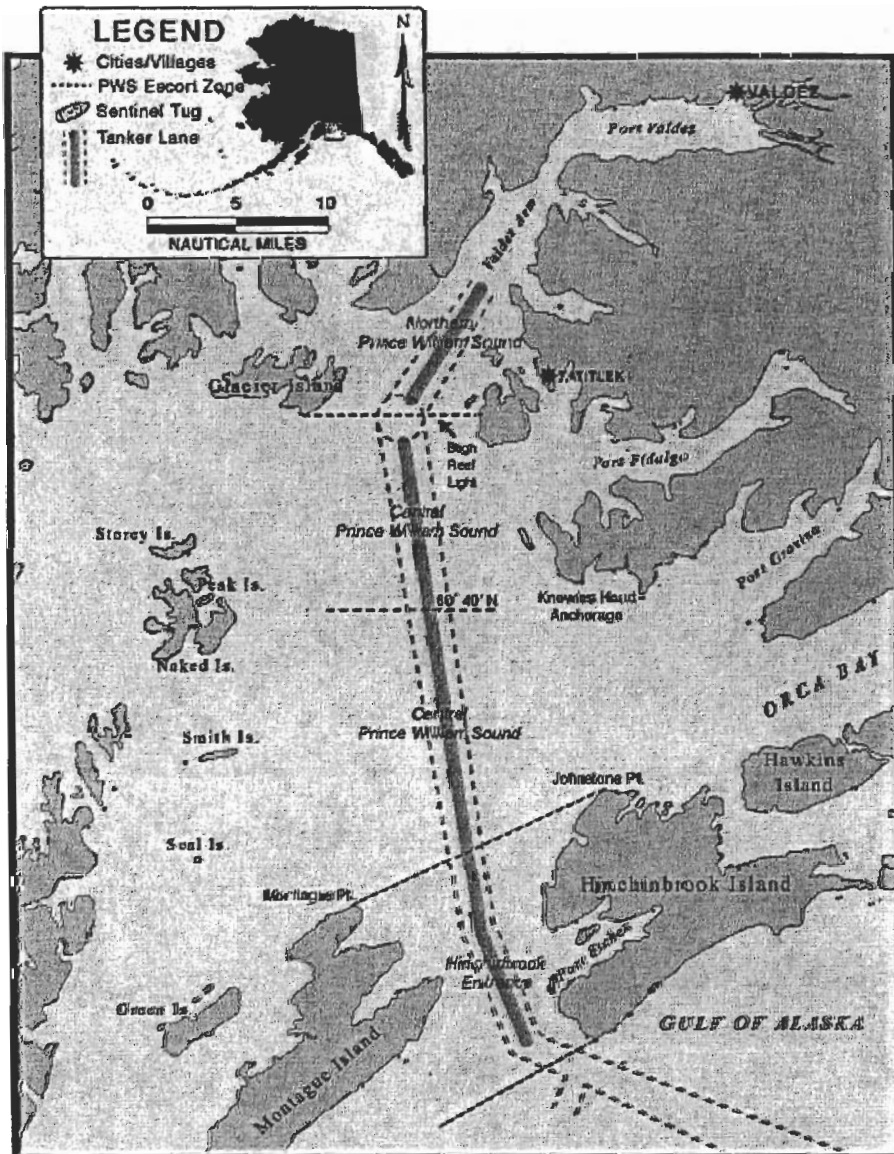


Figure 2 Northern Prince William Sound

In the northern Prince William Sound zone, two escort vessels must maintain close escort (within $\frac{1}{4}$ nm of the tanker), except when one of the escorts is also serving as an ice scout. The primary escort must be tethered to the laden tanker as it transits Valdez Narrows.

Note: The primary escort is tethered at the stern of the tanker. The secondary escort can be in any position within $\frac{1}{4}$ nm of the tanker. For graphic purposes both escorts are shown at the stern of the tanker.

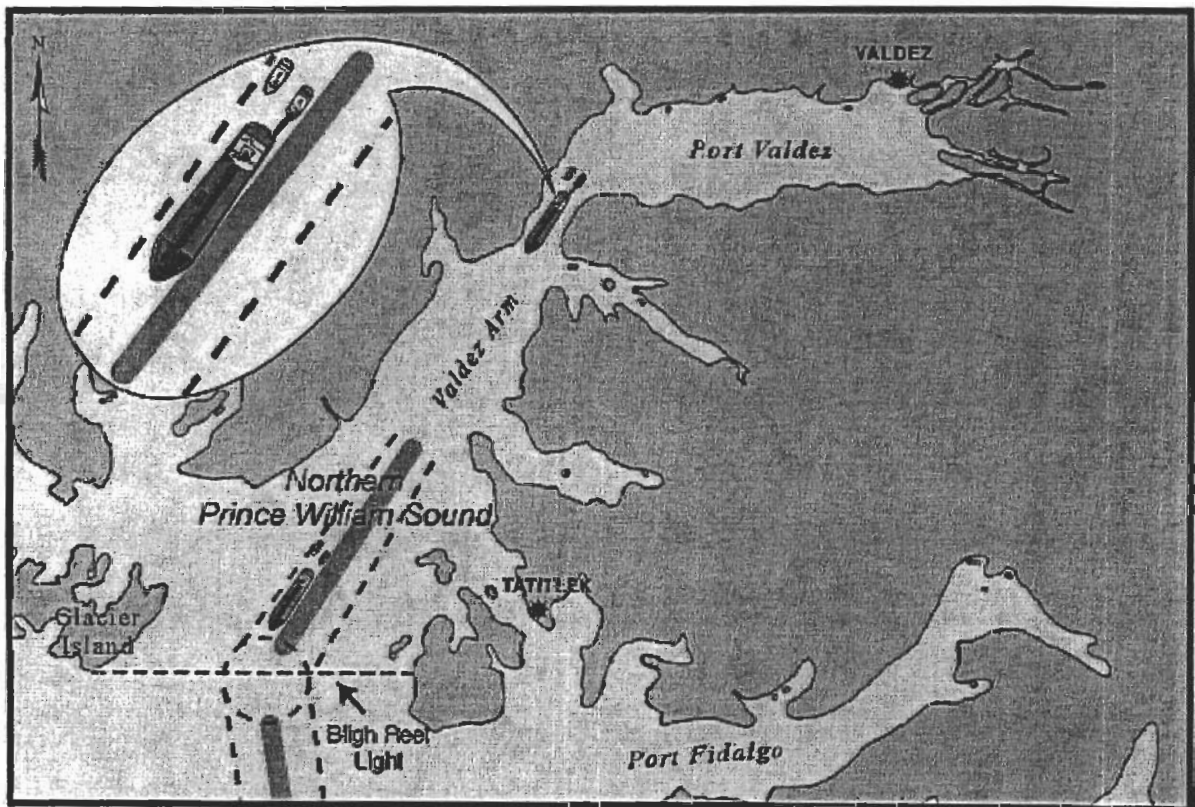


Figure 3 Central Prince William Sound

In the central Prince William Sound zone, the primary escort must maintain close continuous contact (within $\frac{1}{4}$ nm of the tanker), while the second escort may be a sentinel vessel stationed underway off Bligh Reef or east of Naked Island or off Montague Point based on the tanker's location in the Sound.

Note: For graphic purposes both escorts are shown at the stern of the tanker. However, both escorts can be in varying positions as long as the primary escort is within $\frac{1}{4}$ nm of the tanker and the secondary tug is stationed underway as described above.

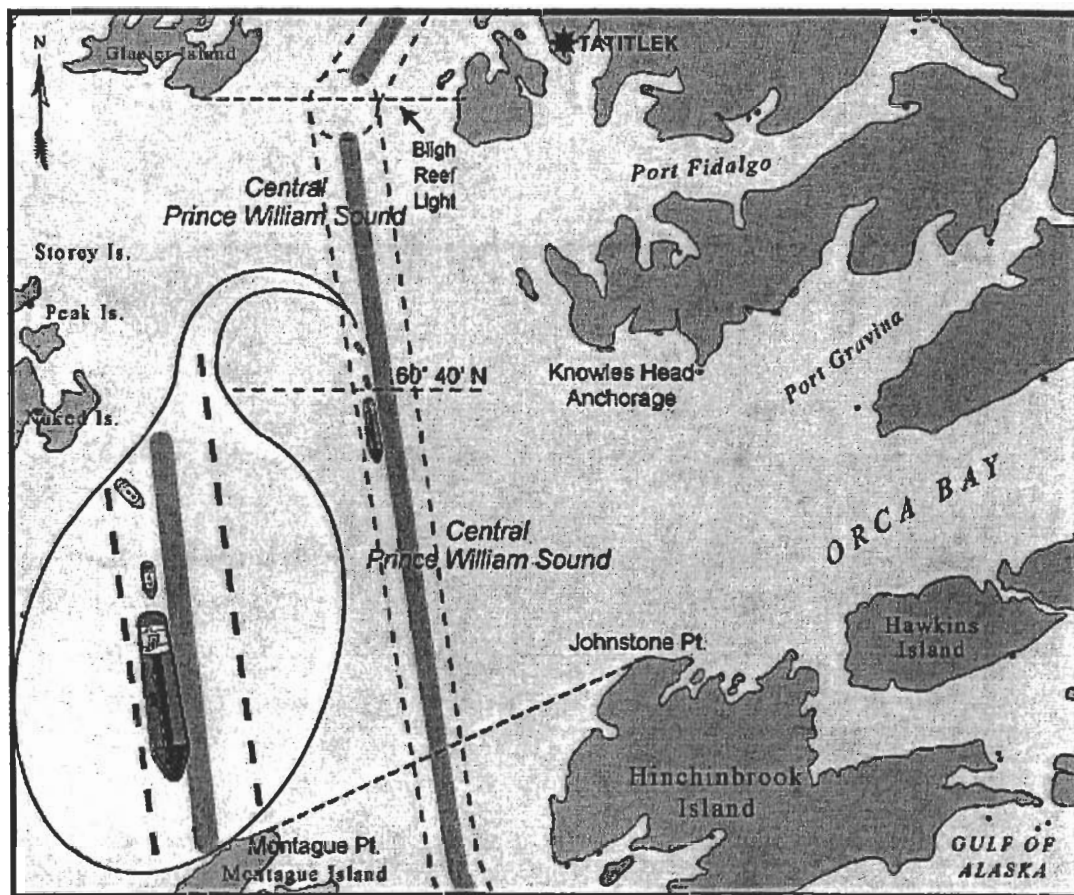


Figure 4 Hinchinbrook Entrance

At Hinchinbrook Entrance, outbound laden tankers must maintain two close (within $\frac{1}{4}$ nm of the tanker) escorts. The Hinchinbrook tug may serve as one of these escorts. Inbound laden tankers must have two vessels in close escort beginning before they cross the line between Cape Hinchinbrook Light and Seal Rocks.

Once an outbound laden tanker reaches Hinchinbrook Entrance, a sentinel escort is stationed underway between Cape Hinchinbrook and Seal Rocks until the tanker reaches a point 17 miles seaward of Cape Hinchinbrook.

Note: For graphic purposes both escorts are shown at the stern of the tanker. However, both escorts can be in varying positions as long as they are within $\frac{1}{4}$ nm of the tanker.

The diagram is a map of the Hinchinbrook Entrance region in the Gulf of Alaska. It shows the coastline of Hinchinbrook Island, including Montague Pt., Johnstone Pt., Port Etches, and Hawkins Island. A dashed line represents the Hinchinbrook Entrance. A tanker is shown moving through the entrance, with two escort vessels positioned at its stern. Two circular callouts provide magnified views of the tanker and its escorts. One callout shows the tanker and escorts from a top-down perspective, while the other shows a side view of the tanker and escorts. A north arrow is located in the upper left corner of the map.

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