U.S. Department of Homeland Security
United States
Coast Guard

Commander
Eleventh Coast Guard District

US Coast Guard Island Bldg 50 Alameda, CA 94501-5100 Staff Symbol: (d) Phone: (510) 437-2968

16670 22 JUN 2022

MEMORANDUM

From:

B. K. Penoyer, RADM CGD ELEVEN

To:

**CG PACAREA** 

Subi:

ELEVENTH COAST GUARD DISTRICT RECOMMENDATIONS ON THE DRAFT

PACIFIC COAST - PORT ACCESS ROUTE STUDY

Ref:

Pacific Coast Port Access Route Study – Draft Report – June 2022

- 1. I recommend all four fairways proposed in Appendix III and incorporate District Eleven Fairway Plan in the PAC-PARS final report. The Fairways recommended for optional vessel routing include (1) D11 Offshore Fairway, (2) D11 Pt. Mugu Fairway, (3) D11 San Diego Fairway, and (4) D11 Near-Shore Fairway. In addition, the Coast Guard should develop these navigation corridors into official national and international charts. The final PAC-PARS fairways should be applied to all NOAA and international charts that meet IMO standards Per SOLAS regulation V/9 Hydrographic services.
- 2. I recommend CG-NAV dissolve the IMO recommended tracks south of San Francisco Traffic Separation Scheme (TSS). These tracks are annotated on Chart 18700 with a Note "J", "IMO adopted Recommended Tracks for vessels 300 gross tons and above (except those carrying hazardous cargo in bulk or crude oil)" and Note "I", "IMO adopted Recommended Tracks for vessels carrying hazardous cargo in bulk (including ore concentrates, explosives, munitions, chemicals, liquefied gases, refined products, distillates or other non-persistent cargo). Vessels using these tracks should use the Western TSS when entering or leaving San Francisco." This IMO recommended track is no longer appropriate with the Bureau of Ocean Energy Management's Morro Bay WEA.
- 3. I recommend CG-NAV continue the regulatory process of IMO recommended Santa Barbara TSS 13NM extension on the North-Western point near Channel Island.
- 4. All four fairways support optimal routing options for vessels transiting through District Eleven Area of Responsibility and maintain the standards established by the West Coast Offshore Vessel Traffic Risk Management Project, which was co-sponsored by the Pacific States/British Columbia Oil Spill Task Force and the Coast Guard Pacific Area in 2002 for voluntary vessel routes. The recommended routes are published in the United States Coast Pilot, 7 Pacific Coast California, Chapter 3, (35) "Offshore Vessel Traffic Management Recommendations". The proposed "D11 Offshore Fairway" provides the charted route as described in the U.S. Coast Pilot for vessels 300 gross tons or larger transiting along the coast and reiterates the need for a minimum distance of 25NM offshore. I encourage tank vessels laden with persistent petroleum products to continue to utilize the recommended distance offshore of 50NM for the protection of the sensitive ecosystems along the Pacific Coast and environmentally critical habitats in the Pacific Ocean.

- 5. I also recommend maintaining the aggressive timeline established by my team and the goals established by Pacific Area Command. I encourage the final report to be completed early in 2023 and Coast Guard Headquarters to prioritize the PAC-PARS to complete all regulatory processes.
- 6. We support public transparency and collaboration with all waterways permitting regulators with offshore wind, commercial space, aquafarms, and structure permitting process. I encourage federal partners and The State of California to continue to work with District Eleven Waterways Management Branch and uphold the need for Navigational Safety Risk Assessments at the earliest phase of the applicant's permitting process and minimize the risk of waterway obstructions.
- 7. The public comment period is critical in the Coast Guards regulatory process. We encourage maximum participation and look forward to the comments on the Draft PAC-PARS.

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Commander
Thirteenth Coast Guard District

915 Second Avenue Seattle, WA 98174-1067 Staff Symbol: (d) Phone: (206) 220-7090

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**MEMORANDUM** 

From:

M. W. Bøuboulis, RADM

CGD THIRTEEN

To:

CG PACAREA

Subj:

THIRTEENTH COAST GUARD DISTRICT RECOMMENDATIONS ON THE DRAFT

PACIFIC COAST - PORT ACCESS ROUTE STUDY

Ref:

Pacific Coast Port Access Route Study – Draft Report – June 2022

- 1. I recommend all the fairways proposed in Appendix 2 and incorporate District Thirteen's Fairway Plan in the PAC-PARS final report. The Fairways recommended for optional vessel routing include (1) D13 Near-Shore Fairway, (2) D13 Off-Shore Fairway, and the associated fairways accessing the D13 Off Shore-Fairway. The final PAC-PARS fairways should be applied to all U.S. and international charts that meet IMO standards Per SOLAS regulation V/9 Hydrographic services.
- 2. These fairways support optimal routing options for vessels transiting through District Thirteen's Area of Responsibility and maintain the standards established by the West Coast Offshore Vessel Traffic Risk Management Project, which was co-sponsored by the Pacific States/British Columbia Oil Spill Task Force and the Coast Guard Pacific Area in 2002 for voluntary vessel routes. The recommended routes are published in the United States Coast Pilot, 10 Pacific Coast Oregon, Washington, Hawaii and Pacific Island, Chapter 3, (35) "Offshore Vessel Traffic Management Recommendations". The proposed "D13 Offshore Fairway" provides the charted route as described in the U.S. Coast Pilot for vessels 300 gross tons or larger transiting along the coast and reiterates the need for a minimum distance of 25NM offshore. I encourage tank vessels laden with persistent petroleum products to continue to utilize the recommended distance offshore of 50NM for the protection of the sensitive ecosystems along the Pacific Coast and environmentally critical habitats in the Pacific Ocean.
- 3. I also recommend maintaining the aggressive timeline established by the D11 and D13 teams as well as the goals established by Pacific Area Command. I encourage the final report to be completed early in 2023 and that Coast Guard Headquarters (CG-NAV) prioritizes the PAC-PARS to complete all regulatory processes as soon as possible.
- 4. We support public transparency and collaboration with all waterways permitting agencies especially offshore energy, commercial space endeavors, marine sanctuaries and aquafarms. I encourage federal partners and the states of Oregon and Washington to continue to work with USCG District Thirteen Waterways Management Branch, Sector Columbia River and Sector Puget Sound to coordinate and complete Navigational Safety Risk Assessments at the earliest phase of the applicant's permitting process to minimize the risk of waterway obstructions.

5. The public comment period is critical in the Coast Guards regulatory process. We encourage maximum participation and look forward to the comments on the Draft PAC-PARS.

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## Commander Coast Guard Pacific Area

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**MEMORANDUM** 

From: A. J. Tiongson, VADM

CG PACAREA (PAC-00)

To: COMDT (CG-NAV)

Subi: DRAFT PACIFIC COAST PORT ACCESS ROUTE STUDY

Ref: (a) Pacific Coast Port Access Route Study – Draft Report – July 2022

- 1. As demand for the use of coastal waters grows, the draft Pacific Coast Port Access Route Study (PAC-PARS) provides an important examination of the need for additional vessel traffic routing measures to ensure navigational safety.
- 2. I intend the draft study be published in the *Federal Register* for a 60-day comment period. This additional round of comments ensures the widest net cast for interested parties to have a voice in this important effort for safety of navigation along the Pacific Coast. I appreciate the robust public and stakeholder involvement during the PAC-PARS process so far and look forward to hearing further input on this draft study.
- 3. I commend the diligence and dedication of the Waterways staff at each of the impacted Districts for meeting the challenge of conducting this study in a compressed timeframe.