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February 18, 1998

Honorable Ted Stevens, Chairman
Senate Appropriations Committee
United States Senate
Washington, D.C. 20510

re: need for an **Aleutian Islands Vessel Traffic Risk Assessment**

Dear Senator Stevens,

I would like to share some thoughts and a suggestion with you regarding the recent vessel casualties in the Aleutians - the Kuroshima grounding and the Han Jin Barcelona/Alaska 1 collision off Dutch Harbor.

As you know, the great circle route for cargo transport between Asia and many North American ports, taking vessels through the Aleutian Islands, is one of the most important shipping routes in the world. Many vessels travel through Unimak Pass, into the Bering Sea, and back south past Attu Island, and others transit just south of the chain. While it is difficult to estimate at present, on the order of several hundred million tons of cargo are carried through Alaska waters on this route every year. These large container, bulk, and petroleum product vessels collectively account for perhaps several thousand transits each year through and along the Aleutians. Many of these are foreign flagged/and foreign crewed. In addition, several hundred fishing vessels and cargo vessels that call at Aleutian ports transit the area.

The recent vessel casualties remind all of us that this vessel traffic situation is dangerous, both in terms of human safety and the potential for catastrophic oil spills, and is in need of improved safety measures. My recommendation is to commission an **Aleutian Islands Vessel Traffic Risk Assessment**, similar to the one conducted for Prince William Sound oil tanker traffic a few years ago.

Using the methodology and approach developed in the PWS study, the Aleutian risk assessment should be effective in helping stakeholders in the region better understand and quantify shipping risks and in evaluating the potential benefit of various risk mitigation measures. Basically, the Aleutian assessment should provide the following:

1. **Characterization of Vessel Traffic** - types of vessels, cargoes, flags and crews, frequency and routes of transit, vessel ownership, etc.
2. **Casualty Risk Analysis**- using a complete history of vessel casualties, expert judgment, and the Marine Accident Risk Calculation System (MARCS), a statistical estimate of the frequency and locations of possible accidents would be developed, and critical areas of concern will be identified
3. **Potential Risk Mitigation Measures** - traffic routing agreements, ATBA's, transponders, notices to mariners, pilotage, escort tugs, rescue/salvage tugs, spill response preparedness, etc., that would improve the safety of the system

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The PWS study, which was the first of its kind, cost approximately \$2 million and took two years to complete. And while we would need to think through the scope of the Aleutian risk assessment, those involved with the PWS project suggest that, because the methodology and data analysis is already developed, the Aleutian project could be done for approximately \$750,000 - \$1 million.

Considering the potential consequences of vessel accidents in the area - loss of human life, damage to the rich biological resources in the Alaska Maritime National Wildlife Refuge, damage to the world's most important bottomfish and crab fisheries, etc. - it seems that such an investment would be money well spent.


In addition to human safety concerns, I feel that the threat of catastrophic oil spills in the Aleutians is very serious, and hasn't been adequately addressed. Each of these container vessels carries hundreds of thousands of gallons of heavy fuel in bottom fuel tanks that could easily rupture in a grounding or collision, and there are many product tankers carrying millions of gallons of petroleum product transiting the region as well. And while the TAPS tankers exporting to Asia are presently transiting the area outside 200 miles and transmit real-time position information to the Coast Guard in Juneau via transponders, it is my understanding that this is done through a non-binding agreement and thus could change at any time.

It is possible that the stationing of a dedicated salvage/rescue vessel on standby in Dutch Harbor or at Unimak Pass to render assistance to disabled vessels would contribute greatly to the safety of the system, but this needs to be thoroughly analyzed and confirmed in a risk assessment. Also, it is possible that a more permanent information-sharing network for the Aleutians - such as the PWS RCAC - would improve safety, but again this would best be addressed in the risk assessment.

I am not sure what the best mechanism for administering the project would be at this point, but I would be glad to discuss this further with you and your staff. The principal participants in the project should probably include the U.S. Coast Guard, ADEC, the major shipping companies, the fishing industry, the communities, and the Native community together in a steering committee to provide direction to a project team comprised of some of those who conducted the PWS study. I have enclosed the summary report from the PWS study to provide a context within which to conceptualize the Aleutian project.

I anticipate widespread support for this initiative from the maritime community and other stakeholders, and would appreciate hearing your thoughts on how best to proceed. Thanks for your consideration.

Sincerely,



Rick Steiner, Professor
University of Alaska Marine Advisory Program

cc District Commander, U.S. Coast Guard, 17th District
Commissioner, ADEC
City of Unalaska

F-114
Alaska Marine Pilots Association
Vessel Movement Count By Area
February 1, 1997 through January 31, 1998

Month	Akutan	Beaver Inlet	Dutch	Capt Bay	Atka	Tanaga Bay	Kiska	Aleutians	Adak	Total
Feb-97	36	0	100	123	10	8	1	0	0	278
Mar-97	11	0	91	95	5	18	13	0	0	233
Apr-97	5	0	59	60	0	2	11	0	0	137
May-97	5	0	84	46	0	0	0	0	0	135
Jun-97	9	0	82	40	4	0	4	24	0	163
Jul-97	4	0	90	35	0	0	0	3	0	132
Aug-97	2	0	60	32	0	0	0	0	2	96
Sep-97	21	2	102	53	0	0	0	0	0	178
Oct-97	10	2	75	38	0	0	0	0	0	125
Nov-97	10	0	51	36	0	0	0	0	2	99
Dec-97	2	0	22	24	0	0	0	0	0	48
Jan-98	4	0	57	60	6	0	0	0	0	127
Total	119	4	873	642	25	28	29	27	4	1751