



# SouthEast Alaska Pilots' Association

1621 Tongass Avenue, Suite 300 • Ketchikan, Alaska 99901 • 907-225-9696 • fax 907-247-9696 • pilots@seapa.com

Capt. Kathleen Flury, President  
Capt. Frank Didier, Vice President

29 March 2019

Dear Captain White,

The Southeast Alaska Pilots Association, (SEAPA) has in conjunction with Princess Cruise Lines, Norwegian Cruise Lines and Royal Caribbean Cruise Lines conducted research relevant to the Very Large Cruise Ship, (VLCS) operational guidelines in Southeast Alaska (reference VLCS Committee reports).

The VLCS reports focused on the vessels' modeled handling characteristics to identify guidelines for operations which will be reviewed at the conclusion of the cruise season. During the research, it was noted that in restricted waterways, VLCS class vessels presented less opportunity for recovery from external navigational distractions, which means greater opportunity for single distraction failures. In order to mitigate these external issues and enhance safety of navigation, SEAPA recommends the COTP consider taking the following actions:

For the Port of Ketchikan,

1. Restrict movement of other large vessels transiting Tongass Narrows, in the area of Channel Island and Ohio Rock, between Peninsula Point and the Ketchikan shipyard and Tongass Narrows east channel when VLCS vessels are transiting.
2. That VLCS have Coast Guard escorts to assist in small vessel and seaplane traffic management.
3. That VLCS have a designated safety zone while underway in narrow channels and harbors.
4. The VLCS utilizes Z-drive tractor tugs with a minimum of 50 tons bollard pull for escort and maneuvering. The tugs currently available in the port may be utilized until the appropriate tractor tugs are positioned.
5. That vessels may not anchor in the harbor where the maneuvering of a VLCS may be impeded.
6. That no vessel should be moored outside of the Ketchikan shipyard pier when VLCS vessels are scheduled to transit.

For the Port of Juneau,

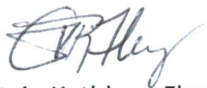
1. Restrict movement of other large vessels transiting Gastineau Channel between Dupont and the Juneau Harbor when VLCS vessels are transiting.
2. That VLCS have Coast Guard escorts to assist in small vessel and seaplane traffic management.
3. That VLCS have a designated safety zone while underway in narrow channels and harbors.
4. The VLCS utilizes Z-drive tractor tugs with a minimum of 50 tons bollard pull for escort and maneuvering. The tugs currently available in the port may be utilized until the appropriate tractor tugs are positioned.
5. That vessels may not anchor in the harbor where the maneuvering of a VLCS may be impeded.

For the Port of Skagway,

1. The VLCS utilizes Z-drive tractor tugs with a minimum of 50 tons bollard pull for escort and maneuvering. The tugs currently available in the port may be utilized until the appropriate tractor tugs are positioned.
2. That VLCS have a designated safety zone while underway in narrow channels and harbors.

Scheduling for review during, and at the conclusion of the 2019 cruise season for the effectiveness of the recommendations should be provided. Nothing in these recommendations should be considered as relieving a person in charge of the vessel's conduct from exercising prudent seamanship and judgement in the discharge of their duties.

Best regards,

A handwritten signature in black ink, appearing to read 'K. Flury', written in a cursive style.

Captain Kathleen Flury

President

Southeast Alaska Pilots Association