

HSRP Comments on Findings and Recommendations (Received as of 9/27/05)

Issue: National Ocean Service Mapping and Charting Contracting Policy and Expansion Strategy and NOAA Core Capabilities

Comments from Panel Member: Mr. Tom Skinner:

Add:

"The HSRP believes that NOAA must maintain an in-house capability to conduct hydrographic surveys, maintain and disseminate hydrographic data bases and products, evaluate new technologies, and oversee contracts for additional high-quality hydrographic survey work and products. The HSRP recommends that NOAA:

1. *maintain a core hydrographic survey capability that includes, but is not limited to:*
 - *technical staff with the highest level of expertise to perform and advise NOAA's in-house hydrographic services and to review, collaborate with, direct, and advise contractors for hydrographic services;*
 - *a national system of geodetic control, water level and current monitoring stations, and systems that provide real-time physical and oceanographic information;*
 - *a national integrated ocean observing system;*
 - *A minimum of six hydrographic survey vessels, with at least one vessel each assigned to the waters of Alaska, the West Coast, the Gulf Coast, the East Coast, and the Great Lakes, consisting of at least one vessel capable of carrying four launches and working in Alaskan waters, at least three vessels capable of carrying two launches, and one near shore survey vessel;*
 - *a coordinated research and development program for hydrographic services; and*
 - *legal and contracting staff with experience in the latest means of contracting for hydrographic services.*
2. *maintain and replace its hydrographic fleet to meet an average vessel age of less than 15 years;*
3. *provide additional funding for contractual services to reduce the backlog of critical and high priority hydrographic surveying needs, and*
4. *continue to work collaboratively with the private sector to improve the overall quality of hydrographic surveys and products."*

Comments from Panel Member: Ms. Helen Brohl

Under "HSRP Findings and Recommendations, The HSRP finds that:" Add to the first bullet, last sentence:

"of 1998, as amended."

Combine bullets 9 and 10 to read:

"Contracting for hydrographic services has only more fully evolved since the passage of the HSIA of 1998 and the HSRP (or date mentioned) recognizes that there has been a remarkable expansion in the amount of contracting for hydrographic services."

Comments from Panel Member: Mr. Larry Whiting (on Mr. Skinner's Comments above):

1. maintain a core hydrographic survey capability...fourth bullet:

I do not recall a completed discussion on "NOAA core hydrographic services capabilities" that stated;

* a minimum of six hydrographic survey vessels, with at least one vessel each assigned to the waters of Alaska, the West Coast, the Gulf Coast, the East Coast, and the Great Lakes, consisting of at least one vessel capable of carrying four launches and working in Alaskan waters, at least three vessels capable of carrying two launches, and one near shore survey vessel;

I do recall a discussion of the number of vessels for "core capability". I may be mistaken, but my recollection is of three vessels not six. "Core Capability" requires a minimum not excess capability. I think the wording should be changed to;

"a minimum of three hydrographic survey vessels, One - four launch vessel for the West Coast and Alaska, one - two launch vessel for the East Coast and Gulf of Mexico and one near shore survey vessel;"

1. maintain a core hydrographic survey capability...sixth bullet:

"legal and contracting staff with experience in the latest means of contracting for hydrographic services."

I agree with the need for an experienced legal and contracting staff. I am questioning how to interpret the words: "with experience in the latest means of contracting." I have heard a contracting officer refer to archaic contracting methods that are used by the government. I do not know what method the "latest means of contracting" represents.

Perhaps, by dropping the words "in the latest means of" the wording can be changed to: "legal and contracting staff experienced in contracting for hydrographic services." (More to follow.)

Comments from Panel Member: Mr. Jonathan Dasler:

From the "HSRP Findings and Recommendations, The HSRP finds that: (last bullet)

- A one-dimensional, comparative-cost metric, such as cost-per-square-mile, should not be used as the primary determining factor in attempting to establish the appropriate balance between public and private hydrographic services capabilities. Despite the obvious attraction of a simple objective metric, numerous cost-comparison studies and reports have failed to withstand critical review. The cost basis between NOAA resources and private industry resources are not directly comparable."

I tried to incorporate this in the cost analysis discussion and seems repetitive.

(On Mr. Skinner's Comments above):

1. maintain a core hydrographic survey capability...fourth bullet:

- "a minimum of six hydrographic survey vessels, with at least one vessel each assigned to the waters of Alaska, the West Coast, the Gulf Coast, the East Coast, and the Great Lakes, consisting of at least one vessel capable of carrying four launches and working in Alaskan waters, at least three vessels capable of carrying two launches, and one near shore survey vessel;

The original document listed 3. I think it is best to not get this specific until this is clearly defined and discussed by the panel. I have concerns over NOAA's ability to staff the assets listed above (see attached [SoapBox](#) article by RAdm. Fields on NOAA Retention Woes). In my view, NOAA would be better served with a core capability of a select fleet of updated modern vessels staffed with highly skilled physical scientists than a larger fleet of aged vessels with less experienced staff."

4. continue to work collaboratively with the private sector...

I would add efficacy to the last bullet item. The collaborative, innovative, effort not only improves quality but also efficiency. I think it should read:

"NOAA should continue to work collaboratively with the private sector to improve the overall quality and efficacy of hydrographic surveys and products."

Comments from Panel Member: Mr. William Gray:

W. O. GRAY THOUGHTS ON

HSRP FINAL RECOMMENDATIONS(OF SEPT 2005) FOR

- ***Hydrographic Survey Cost Analysis***
- ***HSRP RECOMMENDATIONS FOR NOAA'S HYDROGRAPHIC SERVICES ROLE IN THE INTEGRATED OCEAN ODSERVING SYSTEM (IOOS)***
- ***HSRP FINDINGS AND RECOMMENDATIONS FOR NOAA'S MAPPING AND CHARTING CONTRACTING POLICY***

Background

From first hearing that a NOAA HSRP was to be formed two years ago, and now having participated in its first 18 months of deliberations, I have hoped that this group would play a key role in improving the overall level of safety and environmental protection in US waters especially as relates to maritime commerce which is the nation's most vital lifeline with the rest of the world (for energy, raw materials, food and consumer goods).

*My recent knowledge of the need for improvements in this safety system stems from being the principal author of INTERTANKO's 1996 US PORT & TERMINAL SAFETY STUDY which in turn resulted in the US Government's(with industry) **An Assessment of the US Marine Transportation System Sept 1999 Report to Congress** (footnoted in 2nd paper titled above) in which **The HSRP finds that:***

- *The federal government's interest in and responsibility for executing these hydrographic services missions is manifest and non-delegable*
- *There is a continuing critical and urgent need for hydrographic data and services for the public purposes of navigation safety, environmental protection, efficient commerce.....resource management"*

These statements have my complete support. But I believe HSRP should also include the thought I proposed in my draft of July 27, 2005 that:

“ HSRP and NOAA should agree to act together through the cabinet level Interagency Committee on the Marine Transportation System to develop a Comprehensive list of navigational safety informationfrom NOAA, USCG, USACE, NIMA”

In short All parts of the government concerned with navigational safety should work together in coordinating their plans and budgets to deal with the most pressing safety and environmental issue, not simply view only their own narrower priorities.

In concept I see this type of approach as being essential to having the HSRP provide truly useful advice to NOAA. Chairman Rainey has several times suggested precisely that by urging the committee to develop a “MOST WANTED” List.

MOST WANTED CANDIDATES

To reinforce what I believe is the crucial need to immediately adopt this “most wanted” approach rather than sending any of the three narrowly focused papers forward to NOAA and to Congress, I'll cite only two issues to validate the need for this approach. The first issue is within NOAA's competence alone, and the second requires coordinated action by several federal agencies.

MOST WANTED ONE

NOAA should immediately use the newest techniques to accurately and promptly survey the remaining navigationally critical areas(still about 20,000 nsm) identified 10 years ago, and also provide federal funding for all existing and planned large port PORTS systems.

The need for these actions to be taken immediately has been manifestly identified by many in government and industry, but the response has been totally inadequate.

MOST WANTED TWO

All parts of the federal government concerned with waterway safety should coordinate and integrate their efforts so that there are no more disgraceful “government caused” accidents like the \$ 160 million ATHOS I fiasco last November when major debris in a government maintained channel caused a grounding and spill because USACE doesn't have the capability to survey the work they've done accurately, but NOAA does, ONLY after the fact !!

CONCLUSION

Until the HSRP agrees to adopt a “MOST WANTED” approach to identify really important issues, I am not interested in dealing with what I consider are mostly 2nd or 3rd order issues of the type covered in much of the three subject papers. One more important concept which might also be MOST WANTED THREE is that I don't support the present push towards private contracting which I feel should be reversed. Chairman Rainey sent us all a National Academy of Sciences report of about 1990 which found that the more crucial hydrographic work should remain a governmental

*function. I completely agree. I surmise that the move in recent years towards private contracting is the result of private entrepreneurs and effective lobbying. but I feel that private firms have neither the continuity, skills or **inherent responsibility or manifest public interest** which only government has both towards the country's waterways and citizens as well as representing the country in international circles like **IHO & IMO**. I can't imagine USCG contracting out aids to navigation (ATONS) or its other marine safety responsibilities.*

Because of these beliefs, I will vote no or abstain on the three papers. If they are approved by HSRP, I will request that these remarks be appended as a minority report. And I hope others may join in supporting these thoughts.

*Sept 26, 2005
W. O. Gray*

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