

Western States Petroleum Association

Comments attached

Development of the Strait of Juan de Fuca & Puget Sound Area Vessel Traffic Safety Report Western States Petroleum Association Comments

The Western States Petroleum Association (WSPA) appreciates this opportunity to comment on the development of the Washington State Department of Ecology (Department) Strait of Juan de Fuca & Puget Sound Area Vessel Traffic Safety Report (Report). WSPA is a non-profit trade association representing companies that explore for, produce, refine, transport and market petroleum, petroleum products, natural gas and other energy supplies in Washington and four other western states. WSPA members are keenly interested in participating in this process and looks forward to the continued development of this document.

Baseline Program

In order for a complete evaluation of any risk assessment in the Strait of Juan de Fuca and the Puget Sound, the Report should also include a baseline of existing oil spill prevention preparedness and response measures already in place. Washington State is regularly recognized as maintaining the most robust oil spill program in the country. Establishing a baseline will assist those reviewing the Report to evaluate the final Report findings. Without a baseline, it will be challenging to understand the recommendations in the Report.

Data Input for the Report

It was understood that the Department would be providing stakeholders a list of references that would be used in the Report. That list would be very helpful in formulating comments on the development of the Report. However, the list has yet to be provided to date.

Several projects have been permitted recently that required studies on risks associated with increased vessel traffic. It is suggested that those studies be considered in the Report. In addition, specific Marine Exchange vessel tracking data on actual rescues would be of significant benefit to the Report.

Emerging Trends in Vessel Traffic

Much of the legislative discussion surrounding SB 6269 focused on the additional vessel traffic that may occur in Washington Waters as a result of the Trans Mountain Pipeline Project. This Report should consider both the impacts of that project in light of the substantial investment in oil spill prevention and response associated with the project **and** vessel trends if the project does not move forward.

Risk Reduction Measurements

When considering proposals for risk reduction, the proposed review should also include a discussion of the amount of relative risk reduction of each measure considered as well as the costs associated with each proposed measure.

Final Report

The May 3, 2018 Department invitation to stakeholder participation states that Department has a “tight timeline” to develop the Report. While the draft Report is due by December 1, 2018, the final Report is not due until June 30, 2019. The scope of this review and Report is substantial. WSPA strongly believes that the Department should fully utilize the time provided by the legislature to evaluate the many important issues to be considered. To be clear, WSPA suggests that the Department consider the December 1, 2018 as a draft Report and then utilize the remaining 6-month time period to continue evaluation of the many issues in the legislation.