

Puget Sound Pilots

See attached.



September 28, 2021

Alex Hess
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Spills Prevention Section
Spill Prevention, Preparedness, and Response Program
Washington State Department of Ecology
PO Box 47600
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Re: Comments Regarding ERTV Analysis – Scope of Work.

Dear Mr. Hess & Team,

Puget Sound Pilots would like to submit the following comments to the Research Questions proposed by the DOE in the Analysis of Emergency Response Towing Vessel – Scope of Work. As a general concept, adding an ERTV to the San Juan Island archipelago would certainly reduce the risk of an oil spill to some degree. The question is, to what degree, and how could the positioning and specifications (such as speed, bollard pull etc.) of such a vessel be optimized for maximum effectiveness? The DOE model should be able to provide relative comparisons to answer the question of positioning and specifications. The following suggestions should help shape the questions to focus on root technical issues behind the questions:

- The findings of the Nuka study commissioned by San Juan County provided valuable information regarding where to station an ERTV for Haro Strait and Boundary Pass for the most effective response. Because the study area required by EHB 1578 includes Rosario Strait and connecting waters, the DOE will need to expand on the study area used by the Nuka team to include these additional waters which will, of course result in different finding from the Nuka study. Due to the geographic separation of Haro Strait/Boundary Pass from Rosario Strait, the response time will be significantly higher which may prove unsatisfactory. In this case, it may be necessary to consider employing two ERTV's, one for each waterway, to keep the response times in an effective envelope. The DOE model should be used to analyze this larger area as well as the effectiveness of one vs. two ERTVs.

- It is unnecessary to study ERTV interaction with the currently escorted tank vessels as these vessels already have effective emergency coverage from their escorts. The study should specifically focus on every other type of non-escorted vessel as these present a higher risk exposure. These vessels should include: tank vessels not escorted under current regs, tank vessels in ballast, container vessels, bulkers, general cargo, roll-on/roll-off etc.
- ERTV Characteristics: The model should be able to directly study/compare ERTV speed and bollard pull capability and could also indirectly study towing vessel equipment by how various tow-gear configurations effect the response time and therefore success rate in an emergency operation. It is suggested that this aspect of the study would include input from towing industry experts with experience/credibility in emergency towing.

In addition to the above comments, Puget Sound Pilots continues to offer our services and input to assist the OTSC and DOE in developing the model, designing the exercises, and interpreting the results.

Respectfully,

Capt. Blair Bouma (OTSC Member)

Puget Sound Pilots

cc: