



755 Winslow Way East
Suite 105B
Bainbridge Island, WA 98110

Charles P. Costanzo
General Counsel & Vice President – Pacific Region

PHONE: 203.980.3051
EMAIL: ccostanzo@americanwaterways.com

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Mr. Alex Hess
Maritime Risk Lead
Department of Ecology, State of Washington
P.O. Box 47600
Olympia, WA 98504-7600

Re: Tug Escort Analysis – Scope
of Work

Dear Mr. Hess:

The American Waterways Operators is the national trade association for the tugboat, towboat, and barge industry, a vital segment of America's transportation system. Sixteen AWO member companies are headquartered in Washington, and many more operate tugboats, towboats, tank barges, and deck barges in Washington waters. Towing vessels move tens of millions of tons of freight every year on Washington waterways, reducing congestion on the state's highways and railroads while producing fewer pollutants than trucks and trains. In addition, harbor and ship assist tugboats perform shipdocking, tanker escort, and fueling services in Washington's harbors and ports. The tugboat, towboat, and barge industry provides the nation with a safe, secure, low-cost, environmentally-friendly means of transportation.

In the past AWO has worked collaboratively with the Department of Ecology on a range of transportation matters to better inform Ecology about maritime operations and safety practices within our industry. AWO served as a member of the 2013 Oil Spill Rulemaking Advisory Committee; the 2016 Columbia River Vessel Traffic Management and Safety Assessment Working Group; and provided significant input to Ecology's study modeling and assessment report to the state legislature. In 2018, AWO helped to inform the work of the Southern Resident Killer Whale Task Force. AWO has also served on the Board of Pilotage Commissioners' Oil Transportation Safety Committee that was charged with providing guidance on the implementation of towing vessel escort laws under Washington ESHB 1578.

As the Department of Ecology begins its analysis of tug escorts in Puget Sound, please consider the tug escort safety risk study developed by Captain Jeff Slesinger of Delphi Marine and attached as an addendum to these comments. The study, commissioned by the Western States Petroleum Association, the American Waterways Operators, and Puget Sound Pilots, outlines specific technical considerations for the escort of laden tank vessels between 5,000

and 40,000 deadweight tons. It was modeled over several days in the Pacific Maritime Institute – Maritime Institute of Technology and Graduate Studies vessel simulator at its maritime training facility in Seattle. The study is intended to inform future tug escort considerations. The Department of Ecology and the Board of Pilotage Commissioners should fully understand the results of this study when performing their own analysis.

Washington's barge and towing vessel operators are committed to effective and appropriate risk mitigation measures. Given our industry's proactive efforts, AWO anticipates that Washington's ongoing oil spill risk modeling will demonstrate that safety and equipment advancements have significantly diminished the likelihood of a catastrophic oil spill event in Puget Sound, particularly from tank vessels. Although the additional spill risk mitigation offered by tug escorts may be difficult to quantify, the ecological costs may be more easily understood. Expanded escort requirements in Puget Sound will increase vessel traffic, attendant emissions, and underwater noise. Additionally, in areas with one-way traffic restrictions, vessels could sit idling for several hours, burning fuel without productive benefit. This study must take these costs into account when determining the ecological benefit of expanding the tug escort program.

The tugboat, towboat and barge industry in Washington state is not static and continues to evolve. We urge Ecology to ensure that this study examines the current and emerging risk profile of the industry, not one that is outdated. This requires realistic projections of vessel traffic, cargo volumes, and vessel risk profiles.

AWO and our members have a history of beneficial collaboration with the Department of Ecology. As a result of this collaboration, the risk of oil spills in Washington waters is exceedingly small. Our members are proud of this result and are committed to continuously improving the safety of the industry.

Thank you for the opportunity to comment on this issue. AWO would be pleased to answer any questions or provide further information as the Department sees fit.

Sincerely,



Charles P. Costanzo
General Counsel & Vice President – Pacific Region