

## Hess, Alex (ECY)

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**From:** Mike Doherty <doherty\_mike@yahoo.com>  
**Sent:** Thursday, September 30, 2021 16:18  
**To:** Hess, Alex (ECY)  
**Cc:** Mike Doherty  
**Subject:** Scope of Work for Analysis of Tug Escorts required by Sec. 3(5) ESHB 1578.

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Dear Mr. Hess.

Thank you for the opportunity to provide comments on the above cited matter. In the development of the Scope of Work, please consider the following comments on the potential reduction of oil spill risks from covered vessels by the use of escort tugs by specified vessels in waters east of New Dungeness Light.

For well over three decades, the public record in oil shipment matters reflects strong public support for escort tugs assisting tank vessels laden with crude oil and product. The record also reflects that the public understands that they may be paying a bit more at the pump for protections against spills and spill risk.

"Near misses". While the record of actual oil or product spilled on Washington waters has declined, the record of "near misses" and "other incidents" has failed to be maintained adequately for the development of sound public policy through analysis. Please increase the "near miss" data subject to the analysis.

Geographic Area. In the area to be studied, please include a thorough analysis of the area known as the "Port Angeles Rotary". Projections for the increases in maritime traffic at this rotary continue to increase.

Geology. Please provide analysis of the shoreline and bottom geology of the areas of the San Juan Islands subject to the study. Past spill risk studies have generally involved soft shoreline and bottom sediments. In the area of the San Juan Islands the shorelines and bottoms contain much more solid rock, which would increase the risk of serious hull damage and spills in grounding incidents.

Covered Vessels. In the "Clear Seas" study, bulk carriers are the largest and most frequent covered vessels transiting the study area. Please assess risks of bulk carrier accidents in the analysis.

Teathered Vessels. Please include in the study the values of increased efficiency in controlling a disabled vessel, by teathered escort tugs. Additional crew training and improved equipment may be involved to limit risks/tradeoffs involved with required teathering escort tugs.

Spills happen! My residence is in Port Angeles, WA. Folks in this area will long remember the ARCO Anchorage spill of ANS crude (235,000 gallons).

Thank you for working during COVID 19 and for providing the opportunity to comment. And, thank you for your consideration of this submission.

Sincerely, mike doherty 360 457 9135  
617 So. B. St.  
Port Angeles, WA 98363

