

# Pacific Merchant Shipping Association

Thank you for the opportunity to comment.

My name is Captain Mike Moore, Vice President of the Pacific Merchant Shipping Association whose membership includes ocean carriers, container terminal operators, tug companies as well as vessel agents serving both tank and non-tank vessels.

By way of relevant background, I helped draft the tug escort scheme for the Port of LA/LB in the 90's and the Tug Escort Standard of Care (and updates) as part of the initial Puget Sound Harbor Safety Plan when serving as Captain of the Port Puget Sound. Identifying appropriate areas to tether was part of that process.

We remain committed (personally and organizationally) to objective needs based continuous improvement. The tug escort study should fully update and acknowledge marine safety advancements made over the decades to reduce the risk of incidents/accidents that might be mitigated by a tug escort scheme. Tug escorts are designed to provide immediate response to situations involving a reduction or loss in propulsion and/or steering and so the probability of such incidents should be determined along with the seriousness of each incident type, location and range of conditions (tide, wind, etc.).

The analysis should involve the risk of transporting smaller volumes of oil on vessels with redundant propulsion and steering compared to the value of adding a tug to the transit mix. The only tank vessel collision in this region involved a tanker colliding with its own tug escort. I highlight this fact not to infer getting rid of tug escorts but to highlight there are other considerations around introducing more transits into the mix with respect to collisions, emissions and underwater noise as compared to how much risk mitigation is being provided by the escort.

Lastly, there should be some overlap with the ERTV study as that study should involve determining overall tug presence and availability in that study region. With the increases in tug escort by the State of Washington and the Trans Mountain project, the involved waterways will involve a significant increase in tug presence.

Respectfully Submitted,

Captain Mike Moore  
Vice President, PMSA