

Puget Sound Partnership

Thank you for the opportunity to provide comments on the "SEPA Determination of Significance EIS Scoping Comment Period - Board of Pilotage Commissioners Tug Escort Rulemaking." As your scoping document asserts, one major element of this scoping phase is to gain input on specific areas that may require a greater level of analysis.

Due to the potential for a large net increase in tug traffic to conduct escorts and return to their places of origin (or elsewhere), the Puget Sound Partnership requests that the co-lead agencies managing the EIS thoroughly examine the potential effects of underwater noise AND physical vessel disturbance on Southern Resident Orcas in relation to the temporal and spatial distributions of related tug operations.

While the Partnership appreciates the potential for tug escorts to reduce the likelihood of maritime accidents and oil spills, the preliminary results from the Tug Escort and ERTV Analyses (shared by the Department of Ecology this week) appear to show a negligible (zero percent) reduction in spill risk would be achieved by having additional tug escorts for tank vessels between 5,000 and 40,000 deadweight tons. Without a clear oil spill risk reduction benefit for orcas and the environment, the additional tug traffic to support such operations seems likely to have only drawbacks for Southern Resident Orcas—in terms of increasing potential exposure to underwater noise and physical disturbance. We hope that you'll consider taking a deeper look into the potential adverse effects of underwater noise and physical disturbance on Southern Resident Orcas if tug escorts are to be expanded beyond the status quo.