

RE: Amendments to the Pilotage Rules Chap 363-116-WAC (Support Escort/Rescue Tug-Alt.C)

From: Mike Doherty (doherty_mike@yahoo.com)

To: doherty_mike@yahoo.com

Date: Thursday, July 31, 2025 at 10:00 AM PDT

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To: The Washington State Board of Pilotage Commissioners

RE: Amendments to the Pilotage Rules, Chap.363-116-WAC -- Support Escort/Rescue Tug (Alternative C)

For many residents of the North Olympic Peninsula, oil spill risks are taken seriously. In December 1985, the Tank Vessel Arco Anchorage, carrying 814,000 barrels of Alaskan North Slope crude oil, entered Port Angeles harbor, ran aground and tore open two cargo holds, spilling 5690 barrels, or 239,000 gallons, into the Port Angeles harbor. Oil drifted as far west as Neah Bay, and east to Dungeness Spit. The 24/7 cleanup lasted over four months.

In December, 1988, a spill occurred from the 300 foot tank barge, Nestucca, loaded with nearly 300,000 gallons of bunker oil from Cherry Point, when a tow line broke. An "insurance wire" that should have been available to deploy in such circumstances was not available. In maneuvers to reconnect the tow, the barge was ruptured by the tug's rudder (a six foot by 18" gash). The "fingerprint" of the oil was found from the Oregon Coast to Vancouver Island. 230,000 gallons spilled. A federal judge found that the "responsible party" had caused the spill.

In 1991, the fish processing vessel Tenya Maru, loaded with 450,000 gallons of fuel oil, rammed a Chinese freighter, 22 miles northwest of Cape Flattery, in Canadian waters. The vessel sank to the ocean floor near the mouth of the Strait of Juan de Fuca. Nearly 75% of the diesel oil and bunker fuel remains unaccounted for. The ship remains 500 feet under water.

I appreciate the several improvements made in recent decades to the oil transshipment system, but much more must be done. However, I agree with other parties that low probability events can have the potential for very high consequences, at least partially because of the record. The record of spilled oil in Washington's waters in the 1980's and 1990's justifies our concern. Communities, local governments and tribal governments have regularly supported efforts to strengthen Washington State oil spill prevention, preparedness, response, monitoring and damage assessment capabilities. U. S. and Canadian tribal governments have express legal rights related to treaties and certain governmental forums. I encourage tribal consultations throughout this process.

I also appreciate the actions of the State Legislature, the Governor, the Department of Ecology Spills Program, the Board of Pilotage Commissioners, and numerous organizations and citizens urging additional safeguards.

The Northern Salish Sea and the Strait of Juan ed Fuca are experiencing increasing congestion in shipping lanes. The expansion of the transshipment of tar sands oil and products will raise additional risks. I support the expansion of tug escort regulations required of offshore oil tankers, to smaller oil tankers and articulated tug barges (ATBs) as well as tow barges between 5,000-40-000 dwt (other than those engaged in bunkering operations).

Thank you for the detailed rule-making process and for the opportunity to comment.

Sincerely,



Mike Doherty, Member
Clallam County Marine Resources Committee
Olympic Coast National Marine Sanctuary. Advisory Committee
Former Member, Washington SeaGrant Advisory Committee

c: Governor Ferguson

State Senator Mike Chapman,

State Representative Steve Tharinger

State Representative Adam Bernbaum

Clallam County Board of Commissioners

Clallam County Marine Resources Committee