



Antonio Machado

Senior Manager, Northwest Technical

August 1, 2025

Sent via upload to: [Tug Escort Rulemaking \(WAC 363-116\) - Comment Period](#)

Ms. Jaimie Bever
Executive Director
Washington State Board of Pilotage Commissioners
Seattle, WA 98121

Re: WSPA Comments on CR-102 Filing of Chapter 363-116 WAC

Dear Ms. Bever:

The Western States Petroleum Association (WSPA) appreciates the opportunity to comment on the CR-102 filing proposing amendments to WAC 363-116, Pilotage Rules (the "Tug Escort Rule"), undertaken by the Board of Pilotage Commissioners (BPC) in coordination with the Washington Department of Ecology (Ecology).

WSPA is a trade association representing companies that supply a diverse range of transportation energy sources across the western United States, including Washington. This includes the transportation and marketing of petroleum, petroleum products, natural gas, and other energy supplies. WSPA has actively participated in this rulemaking process through its membership in BPC's Oil Transportation Safety Committee (OTSC), as well as through stakeholder engagement workshops.

WSPA values the transparent efforts taken by the BPC and Ecology throughout this process. The agencies have demonstrated commendable diligence through multiple meetings, workshops, and the development of the draft Environmental Impact Statement (EIS) and have shown a consistent willingness to address questions and concerns. We appreciate these efforts as we work together toward the shared goal of implementing safe, reasonable, and effective measures to protect Southern Resident Killer Whales from the threat of oil spills.

In addition to the feedback provided in our previous comment letters dated March 7, 2024, and January 17, 2025, attached here for reference, WSPA respectfully submits the following additional comments.

Continued Engagement and Future Collaboration Opportunities

With the June 11, 2025 filing of the CR-102 formally proposing the new Tug Escort Rule under Chapter 363-116 WAC, WSPA requests continued opportunities for engagement in the rulemaking process.

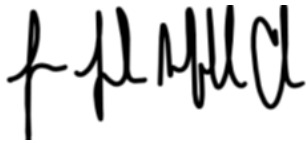
Mitigation Measures and Stakeholder Discussions. In early 2025, the OTSC discussed its intention to convene at future undetermined dates to explore potential mitigation measures associated with the Tug Escort Rule, such as strategies to minimize impacts of tug operations on treaty fishing and underwater noise. WSPA looks forward to participating in these important discussions.

Scheduled Re-evaluation of the Tug Escort Rule. In accordance with RCW 88.46.260, a re-evaluation of the Tug Escort Rule is scheduled to occur by October 1, 2028, and no less frequently than every ten years thereafter. WSPA welcomes the opportunity to engage with both BPC and Ecology during this re-evaluation process, which should allow for the consideration of actual vessel traffic and incident data related to tug escorts under the rule.

Coordination with the Puget Sound Harbor Safety Committee (PSHSC). As emphasized in WSPA's prior comment letters, we encourage BPC and Ecology to collaborate with the Puget Sound Harbor Safety Committee in updating or developing new protocols and Standards of Care. These measures could help reduce the risk of drift groundings and oil spills from laden tank vessels, while also addressing the increased tug traffic required for compliance. We believe these efforts, along with considerations such as self-repair capabilities for tugs or tank vessels, emergency anchoring procedures, and rescue by a tug of opportunity, can provide a comprehensive safety net to enhance spill prevention without imposing undue operational burdens.

WSPA appreciates the opportunity to contribute to this important rulemaking effort and the associated Environmental Impact Statement process. If you have any questions regarding the comments presented in this letter, please do not hesitate to contact me via e-mail at amachado@wspa.org or by phone at (360) 594-1415.

Sincerely,



Attachments: Attachment A – WSPA Comment Letter March 7, 2024.
Attachment B – WSPA Comment Letter April 8, 2023.
Attachment C – WSPA Comment Letter January 17, 2025.

cc: Jessica Spiegel, WSPA



Antonio Machado

Senior Manager, Northwest Technical

March 7, 2024

Sent via email to: BeverJ@wsdot.wa.gov

Ms. Jaimie Bever
Executive Director
Washington State Board of Pilotage Commissioners
Seattle, WA 98121

Re: WSPA Comments on Proposed WAC 363-116 Tug Escort Rulemaking Process

Dear Ms. Bever:

The Western States Petroleum Association (WSPA) appreciates the opportunity to provide comments on the proposed rulemaking process to amend WAC 363-116, Pilotage Rules (hereinafter referred to as the "Tug Escort Rulemaking"), conducted by the Board of Pilotage Commissioners (BPC) in interagency coordination with the Washington Department of Ecology (Ecology). Additionally, WSPA offers comments on the Environmental Impact Statement (EIS), reiterating the points raised in our comment letter dated April 23, 2023, and providing further input for your consideration in the EIS scoping process.

WSPA is a trade association that represents companies which provide diverse sources of transportation energy throughout the west, including Washington. This includes the transporting and marketing of petroleum, petroleum products, natural gas, and other energy supplies.

WSPA has participated in this rulemaking process through its membership in BPC's Oil Transportation Safety Committee (OTSC), as well as in stakeholder engagement workshops. WSPA appreciates the efforts of the BPC and Ecology to ensure a transparent and engaging rulemaking process for stakeholders, which has included multiple meetings and workshops. The involved agencies have shown a willingness to be available to discuss concerns and questions as all parties, work towards the goal of developing safe, reasonable, and efficient measures to protect Southern Resident Killer Whales from the threat of oil spills.

Ecology Tug Escort Analysis Model Results

WSPA believes that recommendations for escort scenarios should be developed with consideration of potential impacts of tug escorts along with the potential benefits of tug escorts. It has been a challenge to provide feedback on some escort scenarios recently, as the focus of the OTSC and stakeholder workshops has been to understand the risk model developed by Ecology and reported in the September 2023 Summary of Tug Escort Analysis Results¹. This summary provides the results of an analysis of expanding tug escorts to additional zones and tank vessel types on Puget Sound waters and estimates how tug escorts can prevent tank vessels from drifting aground after losing propulsion and limit oil spill risk from loss of steering events. Conclusions of the report (pages. 38-40) which are noteworthy at a high-level included:

¹ <https://apps.ecology.wa.gov/publications/UIPages/documents/2308009.pdf>.

“Drift groundings are rare events. Based on our review of historical incidents in the area modeled, we identified four drift groundings between 2002 and 2019 (an average of 0.2105 drift groundings per year). None of these resulted in an oil spill.”

“Tank vessels make up only a portion of drift grounding risk, and drift grounding risk makes up only a small part of overall maritime oil spill risk. Our analysis shows tug escort requirements provide a level of protection against drift groundings, but not a big reduction overall.”

It is WSPA’s understanding that Ecology compared differences between scenarios using relative change percentages. According to Ecology model authors, relative change allowed for evaluation in the differences between scenarios when the magnitude of the changes was small. Further, model filtering has been employed which modifies parameters and variables used in the model. This model filtering appears to change relative risks for various escort scenarios, but it is difficult to determine the significance of these results as they do not appear to be based upon reality (such as actual incidents, standard mariner operating procedures and practices, or natural conditions of geographic zones).

Ecology model authors have stated in workshops that the model assumptions are not based upon actual incidents, owing to the lack of incidents of drift groundings with oil spills, which lends to the question of whether statistically significant or meaningful conclusions can be drawn on the benefits of escort scenarios from the model outputs. Again, without the context of considering both potential impacts of tug escorts as well as benefits, it is difficult to recommend various scenarios based on the model results alone, outside of including the originally proposed tug escort ideas (referred to as Reasonable Alternatives 1, 2, and 4 in the February 28, 2024, OTSC slide presentation, page 7).

Actual Incident Data

In several workshops, the OTSC and stakeholder meeting presentations have provided actual incident data as referenced in Ecology’s Report of Vessel Traffic and Vessel Traffic Safety: Strait of Juan de Fuca and Puget Sound Area (issued January 2019; revised February 2021)². WSPA believes this information provides some key insights on actual oil spill risk for vessel oil transportation. In the report, Ecology provided a summary of vessel incidents between 2008- 2017 in Washington and Oregon waters (pages 61 - 63), which can be summarized as:

- Tank Barges: 45 incidents occurred, with 26 out of 45 incidents resulting in oil spills. 23 of the 26 spills occurred while moored. Of the three spills occurring while underway, one oil spill occurred upstream of a lock on the Columbia River, where towing operations and waterway characteristics are significantly different than the Puget Sound (0 gallons reported spilled, sheen observed). The remaining two spill incidents involved leaks from piping (9 gallons spilled combined)
- The report concludes that “none of the 26 oil spill incidents in Ecology’s data indicated an opportunity existed for a tug escorting a towed tank barge within the Puget Sound to intervene.”
- Articulated Tank Barges (ATB): 20 incidents occurred, with four out of 20 incidents resulting in oil spills. All four spills occurred while the ATB was moored.

² <https://apps.ecology.wa.gov/publications/documents/1908002.pdf>

This data suggests that Ecology has appropriately continued to focus on more significant spill risk mitigation through prevention measures such as the recent rulemaking updates to Ch 173-180 WAC Facility Oil Handling Standards and Ch 173-184 WAC Vessel Oil Transfer Advance Notice and Containment Requirements (adopted June 2023).

Standards of Care

The above-mentioned Ecology Report of Vessel Traffic and Vessel Traffic Safety: Strait of Juan de Fuca and Puget Sound Area also recommended development of Standards of Care by the Puget Sound Harbor Safety Committee (PSHSC), such as a voluntary vessel speed reduction program and wheelhouse watch stander standard (page 216). WSPA suggests that BPC and Ecology consider partnering with the PSHSC to evaluate updates or develop new protocols and standards of care that may reduce risk of drift groundings or other incidents that could have the potential for oil spills from laden tank vessels. Similar as considering the ability of a tug or tank vessel to self-repair, deploy emergency anchoring, and potential rescue by a tug of opportunity, such efforts could be part of a web of protections that provide spill threat reduction benefits without the potential impacts of tug escorts.

Tug Escort Concerns

WSPA is encouraged to see Ecology's resumption of the SEPA EIS scoping and draft development process, as this information is critical to evaluating all aspects of the Tug Escort Rulemaking fully and carefully. As noted above, WSPA provided comments on the EIS scoping in our letter dated April 8, 2023 (see attached), and requests Ecology's review and consideration of these comments during scope development of the EIS. In addition to the EIS scoping comments contained in the above-referenced letter, WSPA requests BPC and Ecology further evaluate the potential impacts of increased tug escort activity that may tighten navigation channels and increase the risk of vessel collisions thereby threatening mariner safety and the environment.

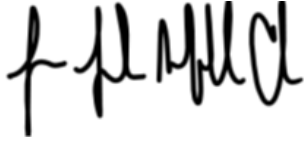
As discussed in the September 2023 Summary of Tug Escort Analysis Results, the model results provide estimates of how expanding tug escorts requirements increase escort tug movements, and found that increased underway time from escort scenarios (ranging from 134% to 263%) implies an increase in risk:

"For Scenario 3, we estimated a 263 percent increase in underway escort tug time, which corresponded to an increase of 0.49 allisions/collisions per year, 0.15 groundings per year, 0.04 sinking/capsize per year and 2.32 other incidents per year" (page 32).

Ecology model authors have acknowledged in workshops that this increased underway time for additional escort tugs is not factored into the model results and relative risk reductions. Based on the model scenarios, it appears there could be *twice or three times as much tug underway time* (depending on the tug escort scenario). The additional tug escort activity represents a significant increase in vessel traffic in the Salish Sea. This surge in activity must be carefully evaluated to assess potential impacts, particularly on the environment. Factors such as underwater and ambient noise need to be considered, as they can have adverse effects on the surrounding ecosystem by the potential for constructive sound interference to occur, leading to an overall increase in sound levels with the increased tug escort activity.

WSPA appreciates the opportunity to provide comments on this important proposed rulemaking and the EIS process. If you have any questions regarding the comments presented in this letter, please do not hesitate to contact me via e-mail at amachado@wspa.org or by phone at (360) 594-1415.

Sincerely,



Cc: Jessica Spiegel, WSPA
Haley Kennard (Transmitted via: hken461@ECY.WA.GOV)
Sara Thompson (Transmitted via: stho461@ECY.WA.GOV)
Washington State Department of Ecology
Spill, Prevention, Preparedness and Response Program
PO Box 47600
Olympia, WA 98504-7600

Attachment: WSPA Comments on EIS Scoping for Proposed WAC 363-116. April 8, 2023



Antonio Machado

Senior Manager, Northwest Technical

April 8, 2023

Sent via upload to: <https://sppr.ecology.commentinput.com/?id=drNJk>

Ms. Kim Morley
Washington State Department of Ecology
Spill Prevention, Preparedness, and Response Program
PO Box 47600
Olympia, WA 98504-7600

Re: WSPA Comments on EIS Scoping for Proposed WAC 363-116 (Pilotage Rules) Amendments

Dear Ms. Morley,

Western States Petroleum Association (WSPA) appreciates the opportunity to comment on the scoping of the Environmental Impact Statement (EIS) for the Board of Pilotage Commissioners (BPC), in consultation with the Department of Ecology (Ecology), rulemaking to amend WAC 363-116, Pilotage Rules (rulemaking hereinafter referred to as "Tug Escort Rule"). WSPA is a trade association that represents companies which provide diverse sources of transportation energy throughout the west, including Washington. This includes the transporting and marketing of petroleum, petroleum products, natural gas, and other energy supplies.

WSPA's comments are based on the "*State Environmental Policy Act (SEPA) Determination of Significance and Request for Comments on Scope of Environmental Impact*"¹ and the BPC/Ecology (as co-lead agencies) presentation² during the EIS scoping meeting held on March 21, 2023 (March EIS Scoping Meeting). BPC/Ecology has indicated that the rulemaking will:

- Describe tug escort requirements for the following vessels operating in the waters east of the line extending from Discovery Island light south to New Dungeness light and all points in the Puget Sound area:
 - Oil tankers of between 5,000 and 40,000 deadweight tons.
 - Articulated tug barges (ATB) and towed waterborne vessels or barges greater than 5,000 deadweight tons that are designed to transport oil in bulk internal to the hull.
- Specify operational requirements for tug escorts, where they are required.
- Specify functionality requirements for tug escorts, where they are required.
- Consider the existing tug escort requirements applicable to Rosario Strait and connected waterways to the east, established in RCW 88.16.190(2)(a)(ii), including adjusting or suspending those requirements, as needed.
- Describe exemptions to tug escort requirements, including whether certain vessel types or geographic zones should be precluded from the escort requirements.
- Make other changes to clarify language and make any corrections needed.

¹ <https://apps.ecology.wa.gov/separ/Main/SEPA/Record.aspx?SEPANumber=202300768>.

² <https://ecology.wa.gov/DOE/files/78/78928e77-ccc1-4765-b489-2fa167962f83.pdf>.

During the March EIS Scoping meeting, BPC/Ecology requested feedback from stakeholders on not only the elements to be included in the EIS but also suggested alternatives to the proposed rule approach. Provided below is WSPA's feedback regarding both of these BPC/Ecology requests.

Elements of the EIS

In general, WSPA agrees with the EIS elements presented by BPC/Ecology during the March EIS Scoping Meeting. The following is additional input regarding the elements to be considered in the EIS.

Air Quality

WSPA appreciates that BPC/Ecology acknowledged during the March EIS Scoping Meeting that the additional emissions resulting from the proposed rule amendment (specifically, emissions due to an increase in the number of tug escorts in use) will be assessed in the EIS. WSPA believes that the evaluation of this incremental environmental impact is an important aspect of the EIS effort.

Environmental Health

It is WSPA's understanding that it is BPC/Ecology's intent to assess the underwater noise impacts resulting from the proposed rule amendment. The National Oceanic and Atmospheric Administration (NOAA) has highlighted the concern with effects of underwater noise to Southern Resident Killer Whale behavior.³ WSPA encourages the assessment of the incremental increase underwater noise and its potential impact on marine mammals (particularly, the Southern Resident Killer Whale).

Another sub-element under Environmental Health identified by BPC/Ecology is "Releases or potential releases to the environment affecting public health." WSPA requests that this sub-element of the EIS includes a risk assessment analyzing increased risk for fuel spills and collisions due to the increase of escort tug volume. The consideration of the potential impact (risk of fuel spills and/or vessel collisions due to increased escort tug use) must be included along with the potential benefit (reduced risk of an oil spill) for this rulemaking through the risk assessment process.

-It is WSPA's understanding that an assessment similar to the Ecology-sponsored DNV-GL report entitled "*Columbia River Vessel Traffic Evaluation and Safety Assessment (CRVTSA)*"⁴ is being completed for this rulemaking. Specifically, Ecology presented preliminary results from the "*Tugs Escort and ERTV Analyses*" during a webinar held on April 4, 2023. According to the Ecology presentation, the purpose of the analyses was to inform rulemaking and was to be completed by the summer 2023. WSPA supports this type of study for the area covered by the rulemaking as a necessary element of the rulemaking. Given the proposed timeline, WSPA encourages Ecology to allot sufficient time for the appropriate peer review by stakeholders.

Cumulative Impacts

One element not identified by BPC/Ecology in the Determination of Significance or during the March EIS Scoping Meeting was Cumulative Impacts. As noted in Ecology's *State Environmental Policy Act Handbook*⁵, SEPA rules direct agencies to "[i]dentify and evaluate probable impacts,

³ <https://www.fisheries.noaa.gov/species/killer-whale#spotlight>

⁴ <https://apps.ecology.wa.gov/publications/documents/1708019.pdf>

⁵ <https://ecology.wa.gov/DOE/files/4c/4c9fec2b-5e6f-44b5-bf13-b253e72a4ea1.pdf>

alternatives, and mitigation measures, emphasizing important environmental impacts and alternatives (including Cumulative...).” WSPA suggests that cumulative impacts be included as an element of the Tug Escort Rule EIS.

Suggested Alternatives

No-Action Alternative

Because SEPA requires the evaluation of the no-action alternative⁶, WSPA assumes that BPC/Ecology will include a no-action element in the Tug Escort Rule EIS to provide a benchmark from which the other alternatives can be compared. The no-action alternative is of particular interest in situations where the potential impact of a proposed action (i.e., increased tug escort traffic) outweighs the potential benefit (i.e., reduced oil spill risk). WSPA requests that BPC/Ecology verify that the no-action alternative will be part of the EIS scope.

Limited Area Alternative

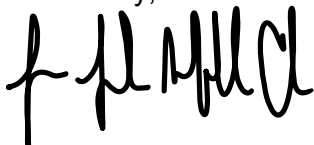
As described in the “*State Environmental Policy Act (SEPA) Determination of Significance and Request for Comments on Scope of Environmental Impact*”, BPC/Ecology is proposing that the Tug Escort Rule amendment apply to waters east of the line extending from Discovery Island light south to New Dungeness light and all points in the Puget Sound area. It is further noted that the rule will describe exemptions to tug escort requirements, including whether certain vessel types or geographic zones should be precluded from the escort requirements. WSPA suggests that to help inform the exemption concept or to directly exclude areas from the rule amendment, BPC/Ecology consider a limited areas alternative which would focus on a reduced boundary for rule applicability.

ATB Exclusion Alternative

The previously-referenced CRVTSA found “[t]ug escorts for articulated tug barges (ATBs) would offer a relatively small reduction in risk in the study area, because ATBs have partially redundant steering and propulsion systems, and they have shallow drafts that allow them to safely navigate outside of the ship channel.” With this finding in mind, WSPA suggests that BPC/Ecology consider an alternative that excludes ATBs. Similar to the no-action alternative, assessment of this alternative would address whether the potential impact of additional tug escorts for ATBs would outweigh the potentially marginal oil spill reduction risk.

WSPA appreciates the opportunity to provide comments on this important proposed rule amendment and the EIS process. If you have any questions regarding this submittal, please contact me at (360) 594-1415 or via email at amachado@wspa.org.

Sincerely,



Antonio Machado
Sr. Manager, Northwest Technical



⁶ *Id.*, p. 37.



Antonio Machado

Senior Manager, Northwest Technical

January 17, 2025

Sent via upload to: [Tug Escort Rule Informal Comment Period](#)

Ms. Jaimie Bever
Executive Director
Washington State Board of Pilotage Commissioners
Seattle, WA 98121

Re: WSPA Comments on Proposed WAC 363-116 Tug Escort Rulemaking Process

Dear Ms. Bever:

The Western States Petroleum Association (WSPA) appreciates the opportunity to provide comments on the proposed rulemaking process to amend WAC 363-116, Pilotage Rules (hereinafter referred to as the "Tug Escort Rulemaking"), conducted by the Board of Pilotage Commissioners (BPC) in interagency coordination with the Washington Department of Ecology (Ecology). WSPA is a trade association that represents companies which provide diverse sources of transportation energy throughout the west, including Washington. This includes the transportation and marketing of petroleum, petroleum products, natural gas, and other energy supplies.

WSPA has participated in this rulemaking process through its membership in BPC's Oil Transportation Safety Committee (OTSC), as well as in stakeholder engagement workshops. WSPA appreciates the efforts of the BPC and Ecology to ensure a transparent and engaging rulemaking process for stakeholders, which has included multiple meetings and workshops. The involved agencies have shown a willingness to be available to discuss concerns and questions as all parties work towards the goal of developing safe, reasonable, and efficient measures to protect Southern Resident Killer Whales from the threat of oil spills.

Along with the feedback provided in our comment March 7, 2024 comment letter, WSPA requests Ecology's consideration of the comments presented below.

EIS Technical Analysis



The November 2024 workshops and meetings focused on technical analyses of the Environmental Impact Statement (EIS) priority environmental elements, and preparing stakeholders for a February 2025 Workshop on reviewing proposed draft tug escort rule language. However, the November Workshop discussions did not include two key objectives of the technical analyses of priority environmental elements:

- Assessing areas of potential impacts; and
- Identifying mitigation measures.

These two objectives are important considerations of the EIS process. While they may have been outside the scope of the November workshops, both objectives warrant careful consideration for priority elements prior to meaningful discussion on rule language. It is premature to develop draft rule language until these critical steps are completed. WSPA requests that Ecology address these two objectives (and inform stakeholders) in advance of the February 2025 Workshop.

Incident Data

In the November 14, 2024 OTSC Workshop, Ecology provided additional information on the incident data presented initially at the Rulemaking Stakeholder Workshop of November 5, 2024. This revised information is shown below:

<div><div><div>*REVISED: Incident Data (2017-2023) within EIS Study Area</div><div><div>DEPARTMENT OF ECOLOGY State of Washington</div></div></div></div>				
Vessel Type	Number of Incidents (Oil Pollution, Vessel Casualty) Identified	Total Oil that Reached the Water (all incidents)	Incidents that Occurred While Vessel was Underway	Number of Incidents Where an Escort Tug May Have Helped (all incidents)
Tankers	31	1.41 gallons	12	4
Tank Barges	16	19.66 gallons	4	4
ATBs	5	27.01 gallons	1	1
Assist/Escort Tugs	5	5.26 gallons	3	N/A

**As requested in the Stakeholder Workshop, we are including information about the number of incidents that occurred while the vessel was underway.*

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The revised incident data raises questions as to: (1) what constitutes an incident; (2) how many incidents occurred where oil was spilled when the vessel was underway; and (3) how many incidents were due to drift groundings (the mitigation of which is the intended focus of the tug escort rule). WSPA requests that Ecology provide the **actual incident data referenced** in this table for further stakeholder review. Such information would provide insights on spill risk for oil vessel transportation.

In earlier workshops, the OTSC and stakeholder presentations provided actual incident data as referenced in Ecology's Report of Vessel Traffic and Vessel Traffic Safety: Strait of Juan de Fuca and Puget Sound Area (issued January 2019; revised February 2021)¹. As noted in the WSPA March 7, 2024 comment letter, this information provided some key insights on actual oil spill risk for vessel oil transportation. In the Report, Ecology provided a summary of vessel incidents between 2008 and 2017 in Washington and Oregon waters (pages 61 - 63), which can be summarized as:

- Tank Barges: 45 incidents occurred, with 26 out of 45 incidents resulting in oil spills. 23 of the 26 spills occurred while moored. Of the three spills occurring while underway, one oil spill occurred upstream of a lock on the Columbia River, where towing operations and waterway characteristics are significantly different than the Puget Sound (0 gallons reported spilled, sheen observed). The remaining two spill incidents involved leaks from piping (9 gallons spilled combined).
- The report concludes that *"none of the 26 oil spill incidents in Ecology's data indicated an opportunity existed for a tug escorting a towed tank barge within the Puget Sound to intervene."*

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- Articulated Tank Barges (ATB): 20 incidents occurred, with four out of 20 incidents resulting in oil spills. All four spills occurred while the ATB was moored.

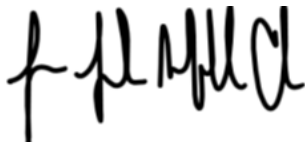
It is not clear whether Ecology's conclusion from the 2019 Report (updated in 2021) would be any different for this new incident data set (2017-2023). If not, the incident data highlights that Ecology has appropriately continued to focus on more significant spill risk mitigation through prevention measures such as the recent rulemaking updates to WAC 173-180 Facility Oil Handling Standards and WAC 173-184 Vessel Oil Transfer Advance Notice and Containment Requirements (adopted June 2023).

Standards of Care

The above-mentioned Report of Vessel Traffic and Vessel Traffic Safety: Strait of Juan de Fuca and Puget Sound Area also recommended development of "Standards of Care" by the Puget Sound Harbor Safety Committee (PSHSC), such as a voluntary vessel speed reduction program and wheelhouse watch stander standard (page 216). As noted in previous WSPA comment letters, we urge BPC and Ecology to consider partnering with the PSHSC to evaluate updates or develop new protocols and standards of care that may reduce risk of drift grounding or other incidents that could have the potential for oil spills from laden tank vessels. Similar to considering the ability of a tug or tank vessel to self-repair, deploy emergency anchoring, and potential rescue by a tug of opportunity, such efforts could be part of a web of protections that provide spill threat reduction benefits without the potential impacts of tug escorts.

WSPA appreciates the opportunity to provide comments on this important proposed rulemaking and the EIS process. If you have any questions regarding the comments presented in this letter, please do not hesitate to contact me via e-mail at amachado@wspa.org or by phone at (360) 594-1415.

Sincerely,



cc: Jessica Spiegel, WSPA