

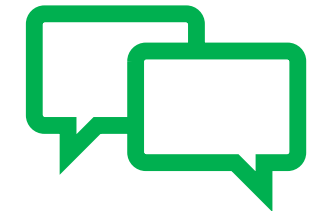


Board of Pilotage Commissioners – Tug Escort Rulemaking

Workshop #5



Agenda



1. Escort Ideas, Analysis Findings, and Discussion
2. SEPA Process overview
3. Next Steps

Escort Ideas

1. Remove Rosario and waters east requirement (Pre – 2020)

 Pre-2020 Escort Regime

2. Maintain Rosario and waters east requirement – no other change

 2023 Escort Regime

- 2a: Maintain Rosario and waters east requirement for specific vessel types

 2023 Escort Regime, Targeted to Specific Vessel Types

3. Escorts for specific vessels in specific zones

 Escorts for Specific Vessels in Specific Zones

4. Escorts for all vessel types in all zones

 Escorts for ALL Applicable Vessels in ALL Specific Zones

Pre-2020 Escort Regime

Idea 1

Pre-2020
Escort
Regime

- Remove RCW requirement for escorts in Rosario and waters east
- No escort requirement for:
 - Barges
 - ATBs
 - Oil Tankers less than 40,000 DWT

Tug Analysis Report Findings

Idea 1

Pre-2020
Escort
Regime

If escort requirements are removed from Rosario and connected waters east, analysis results imply a potential increase in risk (for the whole study area) of:

- 2.3% (drift groundings)
- 3.1% (oil volume at risk)
- 2.6% (oil outflow)



Discussion

Idea 1

Pre-2020
Escort
Regime

Thoughts on pre-2020 escort regime
rulemaking option?

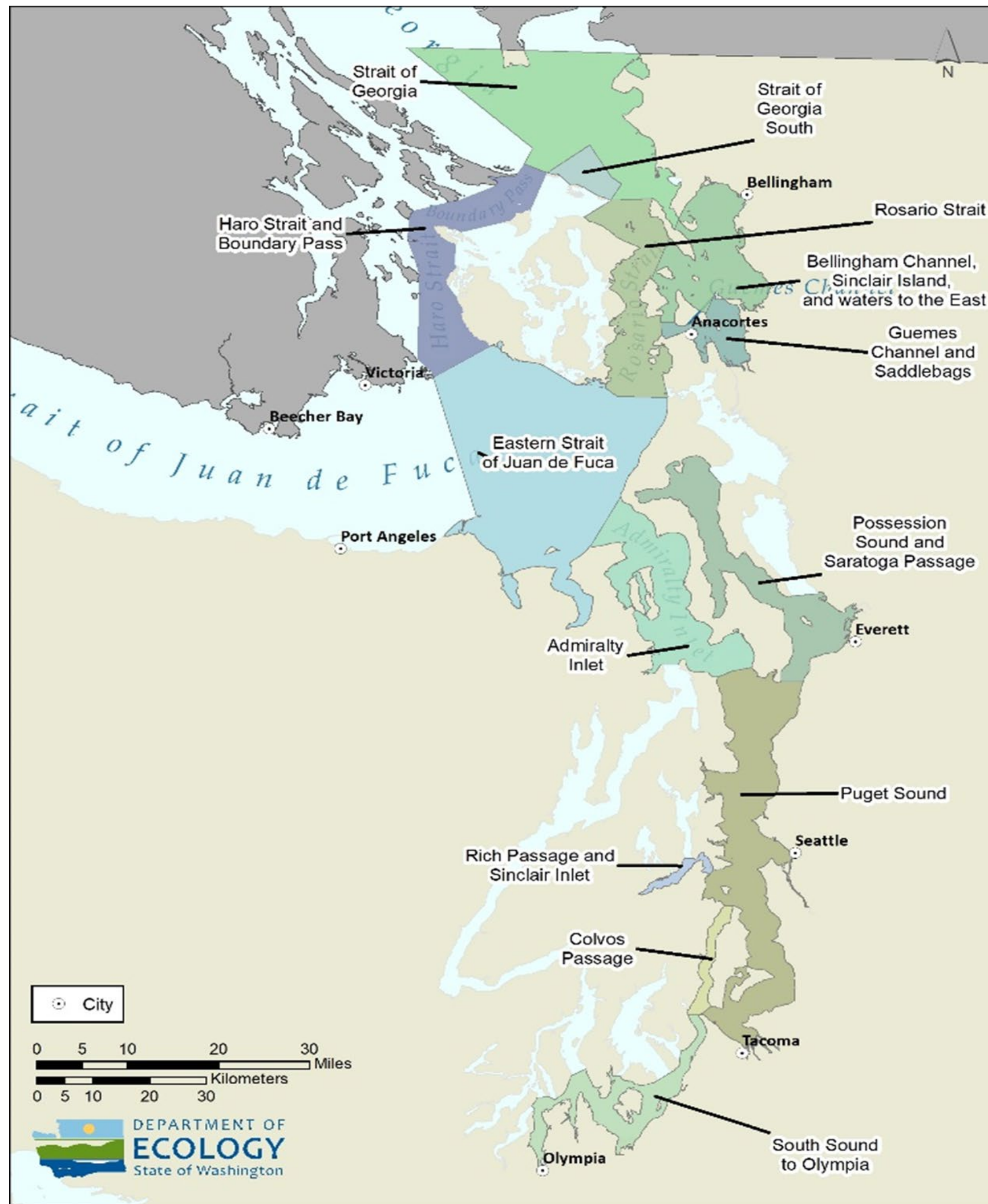
Idea 2

2023 Escort Regime

2023 Escort Regime

- Maintain RCW requirement for escorts of barges, ATBs, and oil tankers less than 40,000 DWT in Rosario and waters east
- No escort requirement outside of Rosario and waters east for:
 - Barges
 - ATBs
 - Oil Tankers less than 40,000 DWT

Zones



Geographic Zones
(Study Area) as
proposed by the OTSC
and adopted by the
Board.

Idea 2

2023
Escort
Regime

Tug Analysis Report Findings

Drift Grounding Metric	<ul style="list-style-type: none">• 2.3% decrease• .0047 fewer groundings per simulated year (1 in 44 drift groundings potentially prevented)
Oil volume at risk Metric	<ul style="list-style-type: none">• 3.1% decrease• 22,430 gallons less per simulated year
Oil outflow Metric	<ul style="list-style-type: none">• 2.6% decrease• 1.5 gallons less per simulated year

- The benefits of this option are described in analysis scenario 2.
- This is the baseline against which analysis scenario 3 (Idea 4) is measured.

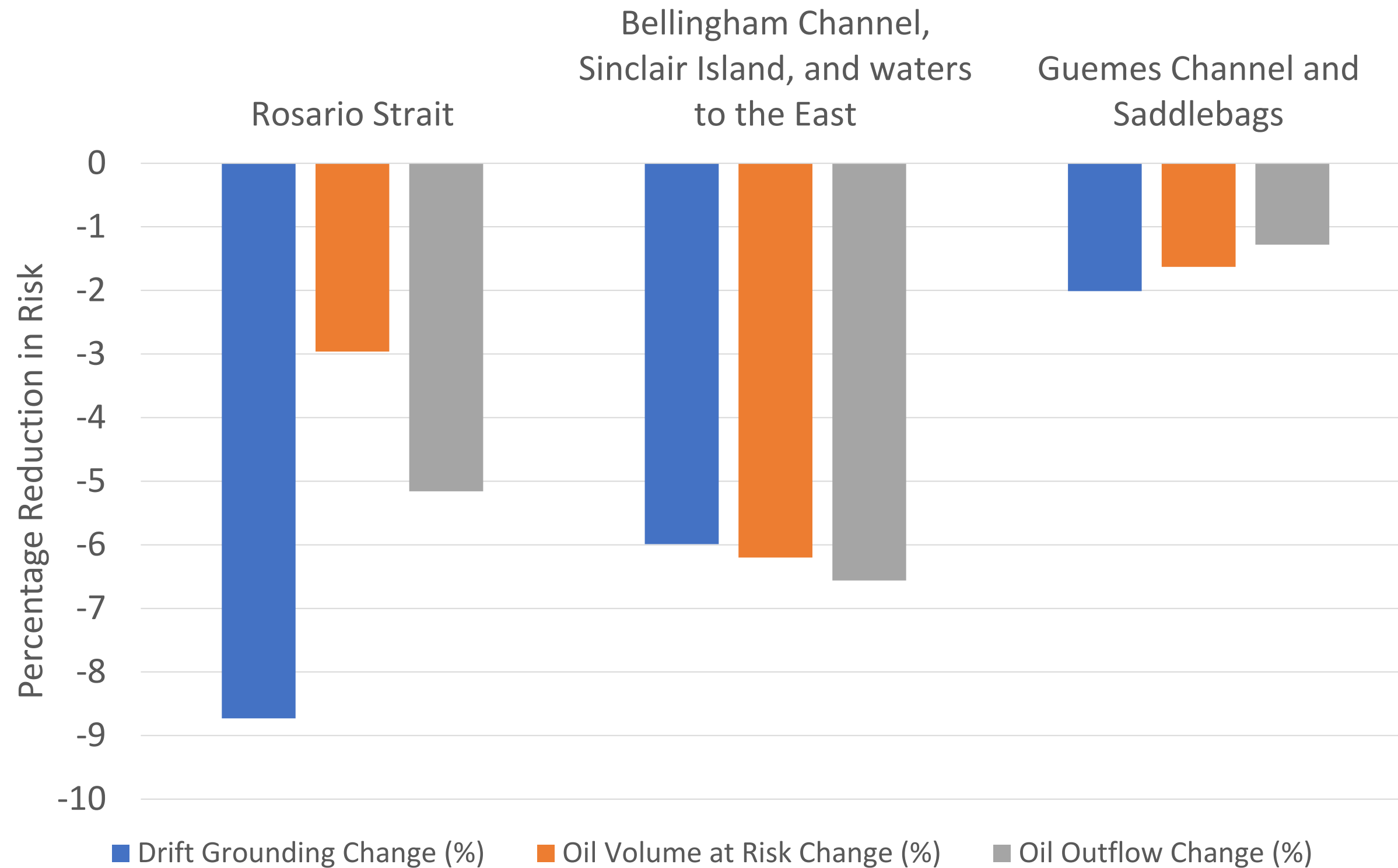


Tug Analysis Report Findings

Changes in oil spill risk from Rosario requirements, by zone

Idea 2

2023
Escort
Regime



Tug Analysis Report Findings

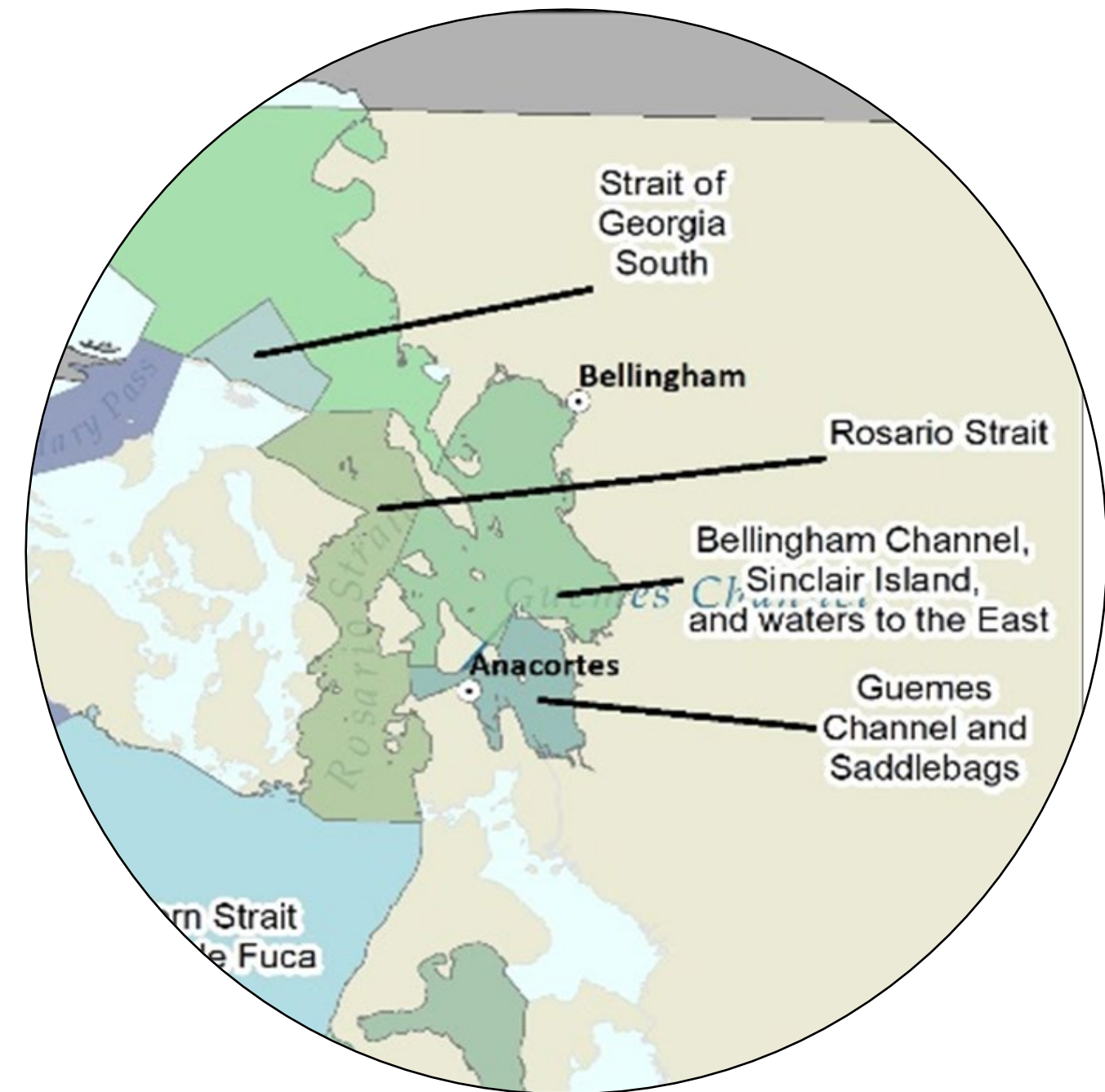
Changes in oil spill risk from Rosario requirements, by zone

Idea 2

2023
Escort
Regime

Zones with Greatest Overall Risk Reduction

Zone	Overall Risk Reduction
Rosario	3 to 9 %
Bellingham	6 %
Guemes	2 %





Discussion

Idea 2

2023
Escort
Regime

Thoughts on 2023 escort regime as
rulemaking option?

Idea 2a

2023
Escort Regime
(specific
vessels)

2023 Escort Regime, Targeted to Specific Vessel Types

- Maintain Rosario and waters east RCW requirement for escorts for some or all:
 - Barges
 - ATBs
 - Oil Tankers less than 40,000 DWT
- No escort requirement outside of Rosario and waters east for:
 - Barges
 - ATBs
 - Oil Tankers less than 40,000 DWT

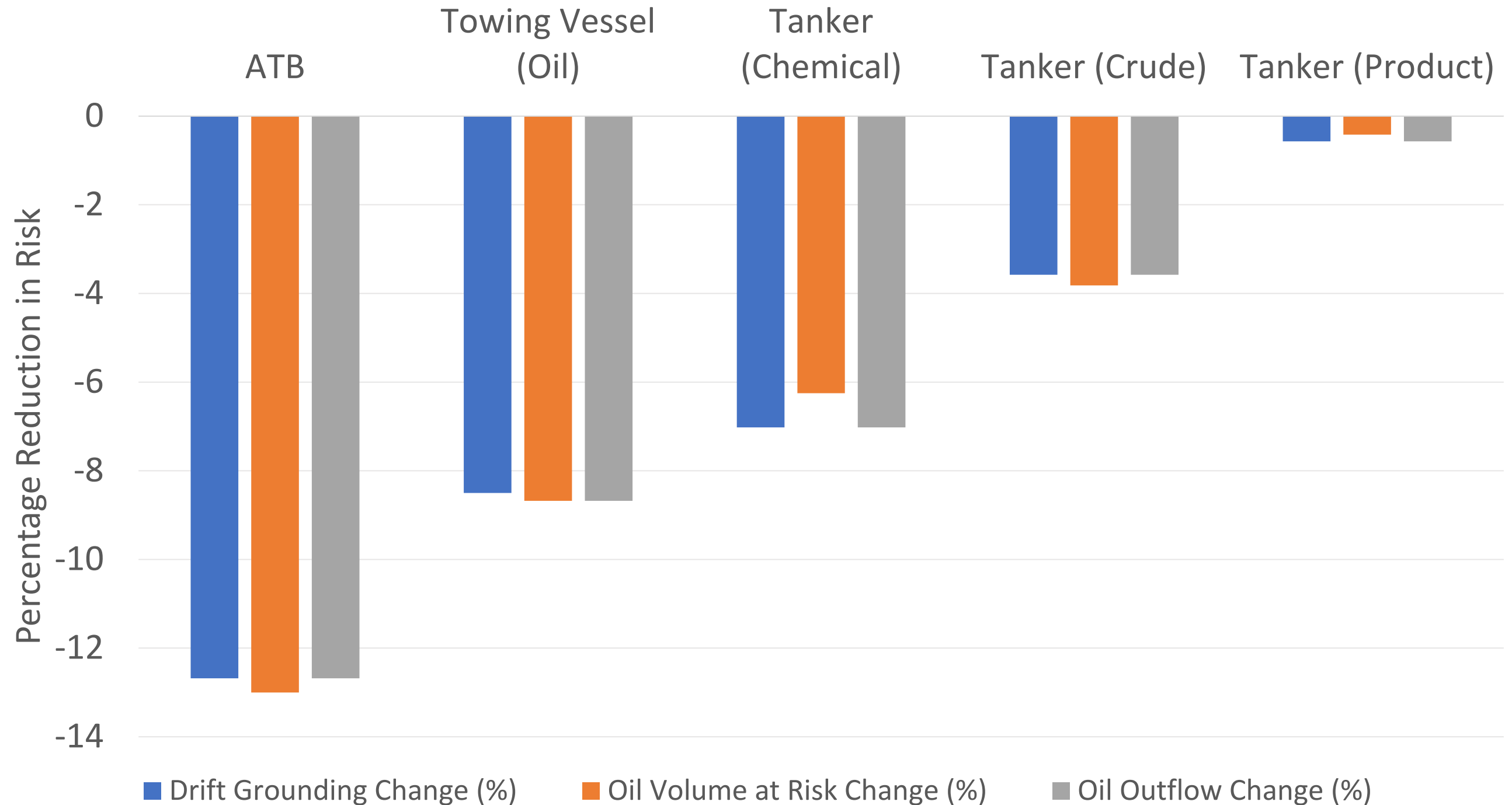


Tug Analysis Report Findings

Changes in oil spill risk from Rosario requirements, by vessel type

Idea 2a

2023
Escort Regime
(specific
vessels)



Tug Analysis Report Findings

Escorting ATBs

Idea 2a

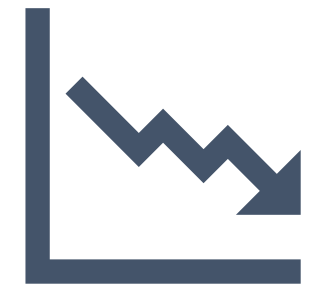
2023
Escort Regime
(specific
vessels)



**13% risk reduction for
ATBs**



**1 in 8 drift grounding
prevented**



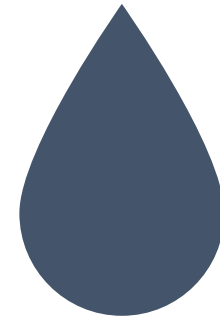
**A reduction of 0.0001
drift groundings per
simulation year**

Tug Analysis Report Findings

Escorting Barges

Idea 2a

2023
Escort Regime
(specific
vessels)



9% risk reduction for barges



1 in 12 drift groundings prevented



A reduction of 0.0003 drift groundings per simulation year

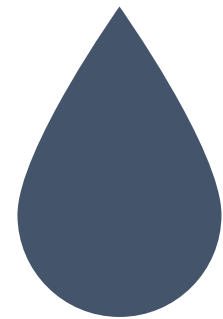


Tug Analysis Report Findings

Escorting Tankers under 40,000 DWT

Idea 2a

2023
Escort Regime
(specific
vessels)



6-7% risk reduction for tankers



1 in 14 drift grounding prevented



A reduction of 0.0004 drift groundings per simulation year

 Discussion

Idea 2a

2023
Escort Regime
(specific
vessels)

Thoughts on the 2023 Escort Regime,
targeted to specific vessel types
rulemaking option?



Escorts for Specific Vessels in Specific Zones

Idea 3

Escorts for
specific
vessels/zones

Language example:

- [Insert applicable vessel type] may not operate in [insert waterway zone], to the extent that these waters are within the territorial boundaries of Washington, unless they are under the escort of a tug.

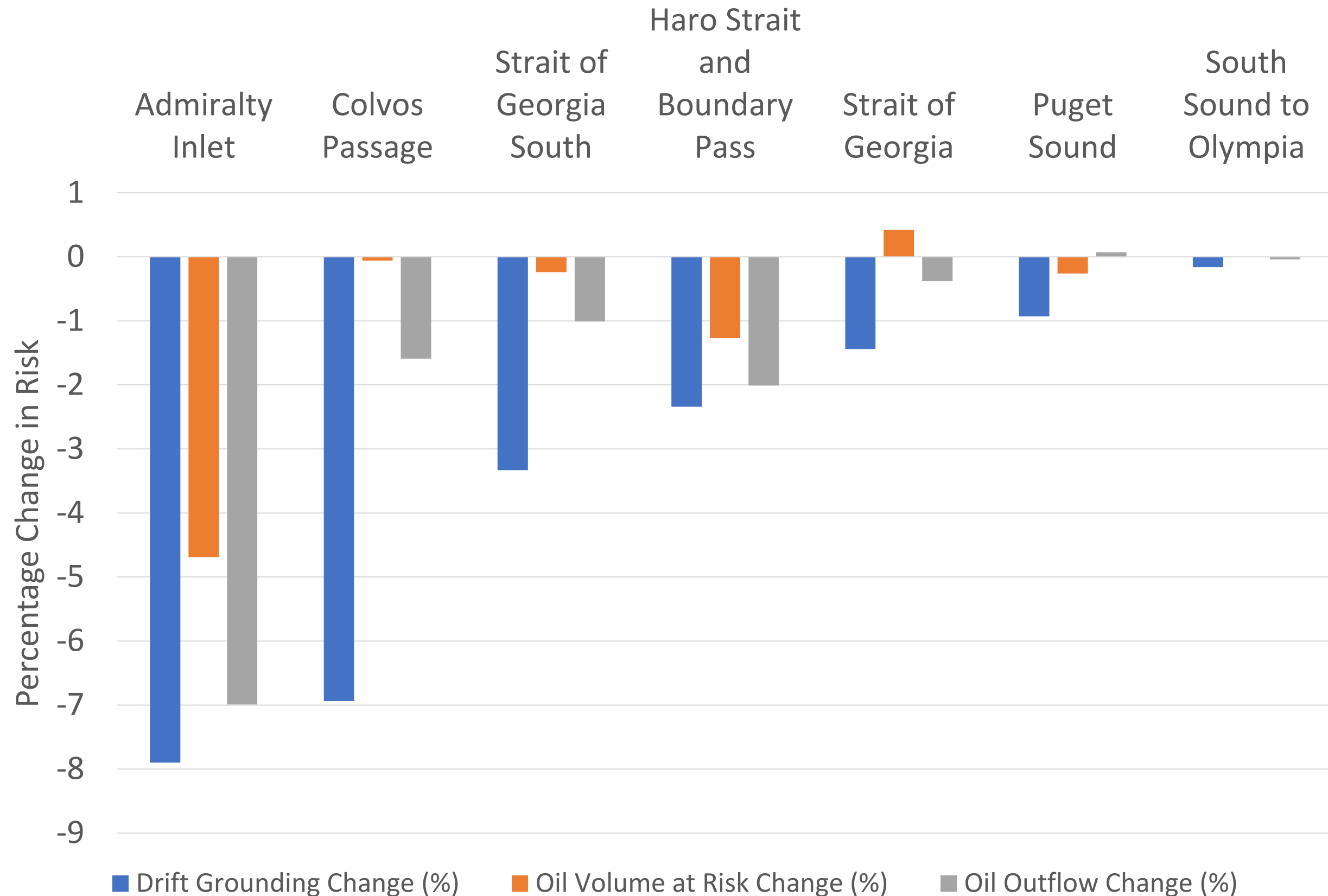


Tug Analysis Report Findings

Changes in oil spill risk for Scenario 3 escort expansion, by zone

Idea 3

Escorts for specific vessels/zones



Tug Analysis Report Findings

Idea 3

Escorts for
specific
vessels/zones

Zones with Greatest Overall Risk Reduction

- In absolute terms, Haro Strait and Boundary Pass saw the biggest reduction in risk across all risk metrics:
 - 0.0015 decrease in drift groundings
 - 1,790.3 decrease in oil volume at risk
 - 0.35 decrease in oil outflow
- Admiralty Inlet was a close second at:
 - 0.0015 decrease in drift groundings
 - 1,736.7 decrease in oil volume at risk
 - 0.29 decrease in oil outflow



Tug Analysis Report Findings

Idea 3

Escorts for
specific
vessels/zones

Zones with Greatest Overall Risk Reduction

Zone	Overall Risk Reduction
Admiralty Inlet	5% to 8%
Haro/Boundary	1% to 2%





Tug Analysis Report Findings

Escorting all applicable vessel types, by zone

Idea 3

Escorts for
specific
vessels/zones

Zones that benefited from additional escort requirements	Zones that DIDN'T benefit from additional escort requirements*
Admiralty Inlet	Eastern Strait of Juan de Fuca
Haro Strait and Boundary Pass	Possession Sound and Saratoga Passage
Puget Sound	Rich Passage and Sinclair Inlet
Strait of Georgia	
Colvos Passage	
Strait of Georgia South	
South Sound to Olympia	

* Rosario and connected waters east had no additional escorts in this comparison – and also saw no benefit.

See Table A-34 Average differences in oil spill risk metrics per simulation between Scenario 2 and Scenario 3 (Scenario 3 - Scenario 2) by geographic zone, study area, excluding ferries in Tug Escort Report.



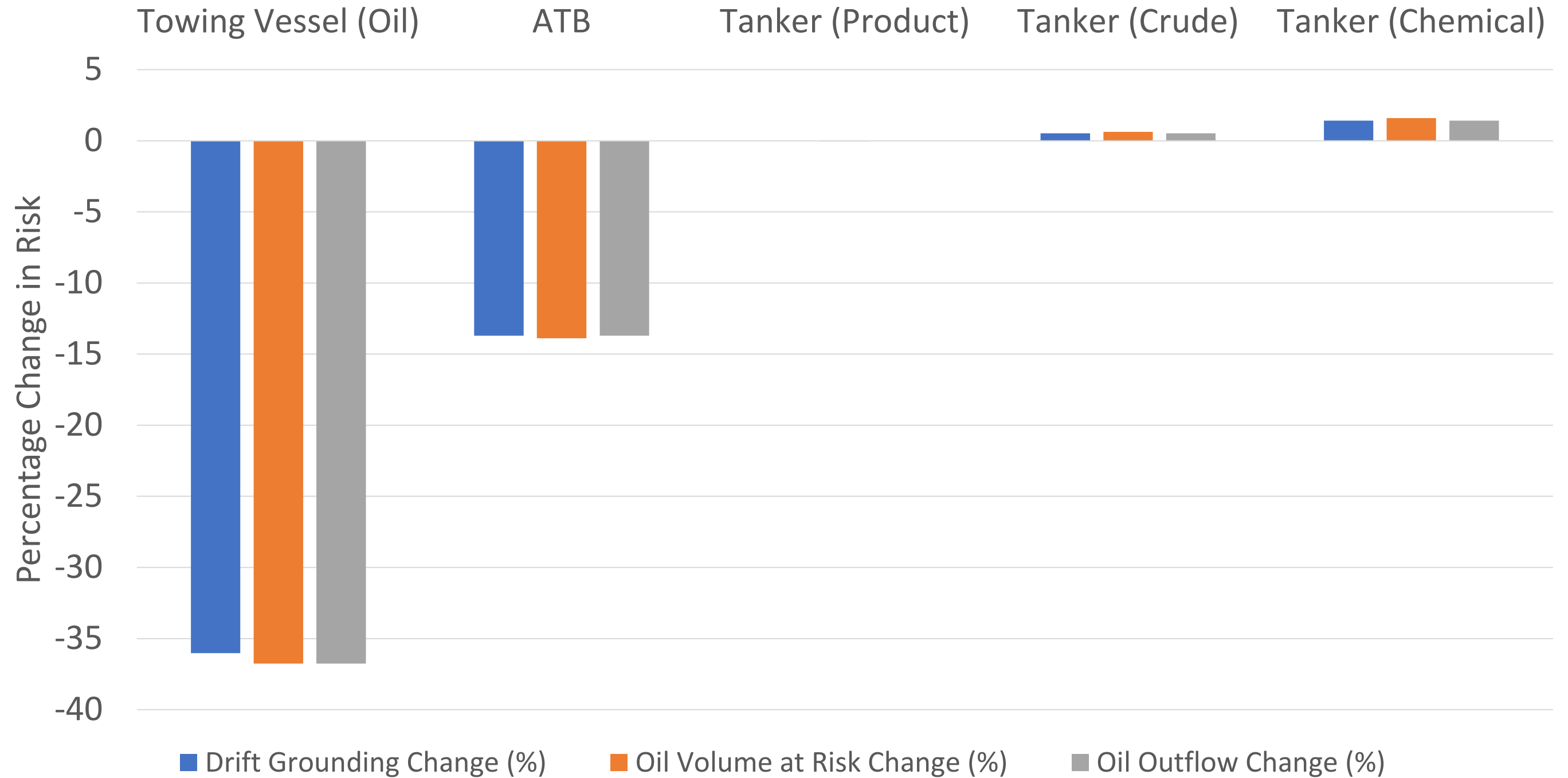


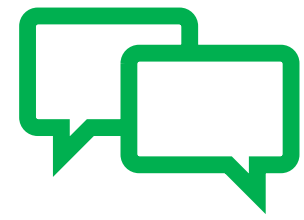
Tug Analysis Report Findings

Changes in oil spill risk for Scenario 3 escort expansion, by vessel type

Idea 3

Escorts for specific vessels/zones





Discussion

Idea 3

Escorts for
specific
vessels/zones

Thoughts on escorts for specific
vessels in specific Zones
rulemaking option?

Escorts for ALL Applicable Vessels in ALL Specific Zones

Idea 4

Escorts for
ALL
vessels/zones

Language example:

- Oil tankers of between five thousand and forty thousand deadweight tons; articulated tug barges that are designed to transport oil in bulk internal to the hull and greater than five thousand deadweight tons; and towed waterborne vessels or barges that are designed to transport oil in bulk internal to the hull and greater than five thousand deadweight tons may not operate 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, to the extent that these waters are within the territorial boundaries of Washington, unless they are under the escort of a tug.



Tug Analysis Report Findings

Idea 4

Escorts for
ALL
vessels/zones

Drift Grounding Metric	<ul style="list-style-type: none">• 1.8% decrease• 0.0035 fewer groundings per simulated year (1 in 57 drift groundings potentially prevented)
Oil volume at risk Metric	<ul style="list-style-type: none">• 0.1% decrease• 103.9 gallons less per simulated year
Oil outflow Metric	<ul style="list-style-type: none">• 0.8% decrease• 0.4 gallons less per simulated year

These metrics show risk reductions of adding escorts for all applicable vessels in all applicable zones **BEYOND (in addition to) the reductions from the escorts in Rosario and waters east.**



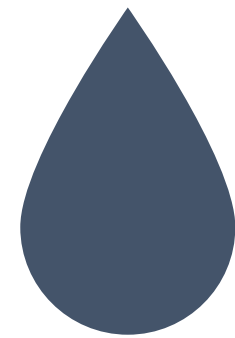


Tug Analysis Report Findings

Escorting ATBs in All Zones

Idea 4

Escorts for
ALL
vessels/zones



**14% risk reduction for
ATBs**



**1 in 7 drift grounding
prevented**



**A reduction of 0.0001
drift groundings per
simulation year**

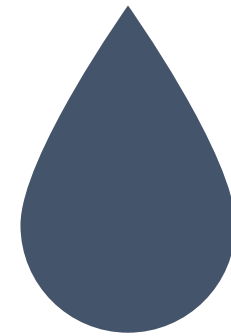


Tug Analysis Report Findings

Escorting Barges in All Zones

Idea 4

Escorts for
ALL
vessels/zones



**36% risk reduction for
barges**



**1 in 3 drift grounding
prevented**

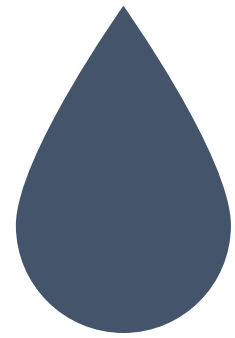


**A reduction of 0.0012
drift groundings per
simulation year**



Tug Analysis Report Findings

Escorting Tankers in All Zones



Idea 4

Escorts for
ALL
vessels/zones

Chemical	1-2% risk increase	No additional drift groundings prevented	An increase of .0001 drift groundings per simulation year
Crude	1% risk increase	No additional drift groundings prevented	Almost no change
Product	Almost no change	Almost no additional drift groundings prevented	Almost no change

 Discussion

Idea 4

Escorts for
ALL
vessels/zones

Thoughts on ALL applicable vessels in
ALL zones rulemaking option?

Other Analysis Data to Inform Rule- making

The BPC Oil Transportation Safety Committee (OTSC) met with the rule team in early January to discuss rulemaking data needs.

Based on this conversation, the modeling team will produce additional views of the modeling results that focus specifically on the benefits of escorts to specific zones and vessel types of interest.

SEPA Process



Dates	Activity
February 2023	<u>CR-101, rule announcement</u>
March 2023	SEPA Scoping meeting
May 2023 – Dec 2024	Workshops with tribes, stakeholders, and interested parties
July 2025	CR-102, propose rule
December 2025	CR-103, adopt rule
January 2026	Rule effective

Proposed EIS Scope

The EIS may consider:

- Historic and Cultural Resources
- Air Quality
- Water Quality
- Plants and Animals
- Energy and Natural Resources
- Environmental Health
 - Noise
 - Releases or potential releases to the environment affecting public health
- Light and Glare
- Aesthetics
- Recreation
- Transportation

SEPA Process

Immediate Next Steps:

- **Late February 2024:** SEPA Workshop (information sent out in the next couple of weeks)
- **February – December 2024:** Ongoing SEPA Workshops (topic specific, review of draft sections, etc.) and coordination with rule language development

Questions, Comments, Want to Talk SEPA Sooner?

Point of Contact: Haley Kennard, Tug Escort

Environmental Analysis Coordinator

hken461@ecy.wa.gov or (564) 233-5178



Upcoming Workshops

Dates	Activity
February 2023	CR-101 – Rule Announcement
March 2023	SEPA Scoping Meeting
May 2023 – December 2024	Workshops with Tribes, Stakeholders, and Interested Parties
July 2025	CR-102, Propose Rule
December 2025	CR-103, Adopt Rule
January 2026	Rule Effective

Workshop 6 - review of other reference material:

- January 31 - OTSC
- February 6 - Stakeholders
- February 8 - Tribes