



STATE OF WASHINGTON  
**BOARD OF PILOTAGE COMMISSIONERS**

**TUG ESCORT IDEAS  
AND  
ENVIRONMENTAL ELEMENTS  
FOR  
SEPA ANALYSIS**

ESHB 1578 *Reducing the threat to southern resident killer whales by improving the safety of oil transportation*  
and  
Chapter 88.16 RCW Pilotage Act  
[88.16.190 Oil Tankers-Restricted Waters-Requirements](#)

**ESCORT IDEAS EVALUATED (Reasonable Alternatives WAC 197-11-786)**

Notes on the approved Escort Ideas (Reasonable Alternatives):

The Board's vote to include an alternative was NOT necessarily a vote in support of that alternative as the final rule language. A vote in support of an alternative says that:

- A. There is information that we can learn to support decision-making by comparing this alternative to other alternatives and
- B. This alternative should remain under consideration.

Alternatives should be those that "could feasibly attain or approximate a proposal's objectives, but at a lower environmental cost or decreased level of environmental degradation. Reasonable Alternatives may be those over which an agency with jurisdiction has authority to control impacts, either directly, or indirectly through requirement of mitigation measures" ([WAC 197-11-786](#)).

**1. Remove Rosario and waters east requirement (Pre-2020):**

Remove escort requirement for laden tank barges and ATBs over 5,000 DWT and oil tankers between 5,000 and 40,000 DWT, while not engaged in bunkering, in Rosario Strait and connected waters east.

Considerations:

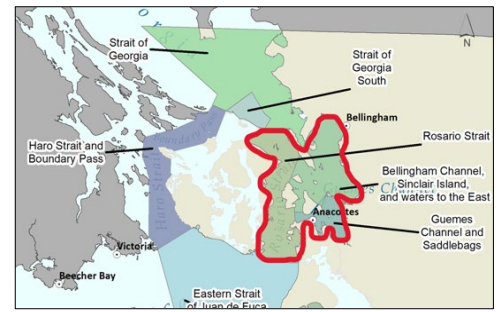
- a. Could result in an increase in oil spill risk
- b. Could reduce tug escort traffic and related impacts



<b>Motion: Kirtley/Drennen - Yes, include in analysis</b> – Carried unanimously	To inform the baseline.
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**2. Maintain Rosario and waters east requirement (no change):**

Maintain escort requirement for laden tank barges and ATBs over 5,000 DWT, and oil tankers between 5,000 and 40,000 DWT, while not engaged in bunkering, in Rosario Strait and connected waters east.



Considerations:

- a. No action alternative.
- b. BPC is required to consider this alternative in the EIS.

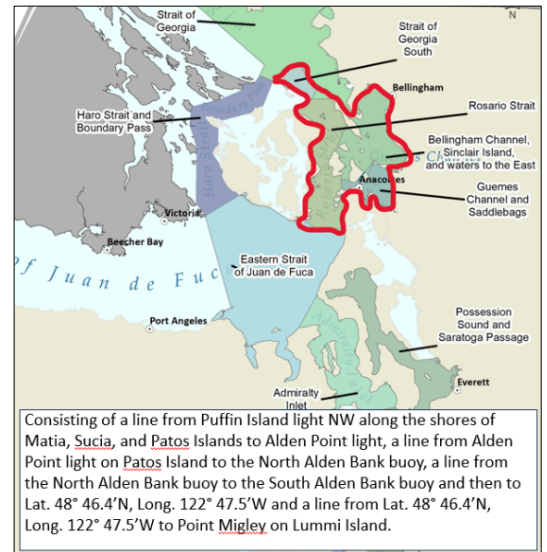
<b>Motion: Farrell/Anthony - Yes, include in analysis</b> – Carried unanimously	It is required.
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**3. Expand 2020 escort requirements to the waters of Strait of Georgia South, and a corner of Strait of Georgia:**

Expand current escort requirement for laden tank barges and ATBs over 5,000 DWT and oil tankers between 5,000 and 40,000 DWT, while not engaged in bunkering, to the waters of Strait of Georgia South, and a corner of Strait of Georgia.

Considerations:

- a. Strait of Georgia South zone is adjacent to current escort area.
- b. The model showed this zone to have a high escort efficiency.
- c. OTSC pilot representative agreed that the characteristics of this zone make it a good candidate for an escort requirement.



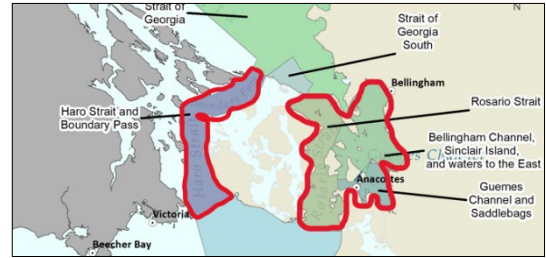
<b>Motion: Drennen/Firth – Yes, include in analysis</b> – Carried with abstention from Commissioner Bendixen.	Helpful to include.
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**4. Expand 2020 escort requirements to Haro Strait and Boundary Pass:**

Expand current escort requirement for laden tank barges and ATBs over 5,000 DWT and oil tankers between 5,000 and 40,000 DWT, while not engaged in bunkering, to Haro Strait and Boundary Pass.

Considerations:

- a. Any BPC expansion of escort requirements to Haro/Boundary would apply within the territorial boundaries of Washington and to the extent provided by law and treaty.
  - i) Escorting of vessels not inbound or outbound for a US port would only be possible if the United States Coast Guard agreed to consult with Canada before such requirement were made.
  - ii) Escorting of vessels inbound or outbound from US ports would be possible but would be a smaller subset of vessels and would bring a level of implementation complexities.
- b. The model found Haro/Boundary had the highest risk reduction in oil volume at risk and escort efficiency. Escorts here also have indirect benefits.



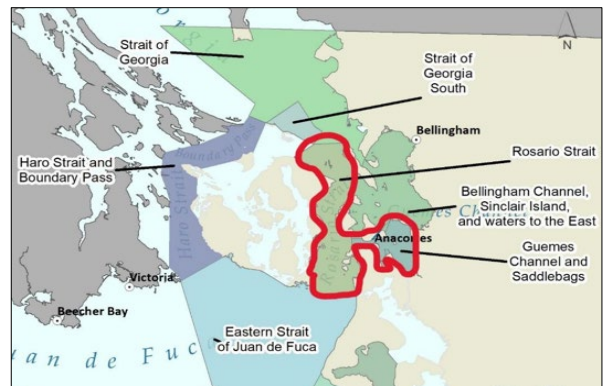
<p><b>Motion: Anthony/Farrell - Yes, include in analysis</b> – Failed with 6 opposed and 3 in favor.</p>	<p>Concerned with complication of transboundary implementation.</p>
<p><b>Motion: Kirtley/Drennen – Revisit this idea during the 2028 rule reconsideration as directed by ESHB 1578</b> – Carried unanimously.</p>	<p>Reevaluate in a couple years after the rule has been in place.</p>

**5. Remove requirements in Bellingham Channel and waters east:**

Remove escort requirements in Bellingham Channel and waters east for laden tank barges and ATBs over 5,000 DWT, and oil tankers between 5,000 and 40,000 DWT.

Considerations:

- a. Out of the three zones that make up Rosario and connected waters, the Bellingham Channel and waters east zone shows the lowest benefit from escorts.



<p><b>Motion: Farrell/Anthony – No, don't include in the analysis</b> – Carried unanimously.</p>	<p>Following the recommendation of the pilot OTSC member as the subject matter expert.</p>
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**ELEMENTS OF THE ENVIRONMENT (for inclusion in EIS scope)**

<b>Element of the Environment Under Consideration</b>	<b>OTSC Recommendation</b>
*Air quality and greenhouse gas emissions	Yes, include
Water quality	Yes, include
*Plants and animals (incl. SRKW and marine mammals)	Yes, include
Energy and natural resources	Yes, include
*Environmental health: releases (oil spill)	Yes, include
*Environmental health: noise (incl. underwater noise and ambient/operational noise)	Yes, include
Aesthetics, light, and glare	Yes, include
*Tribal natural and cultural resources	Yes, include
Historic and cultural resources (other, non-tribal)	No, do not include
*Transportation: vessel traffic	Yes, include

**Motion: Kirtley/Hamilton – Include the elements as recommended by the OTSC (listed above) – Carried unanimously.**