



STATE OF WASHINGTON
BOARD OF PILOTAGE COMMISSIONERS

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Meeting Minutes – Oil Transportation Safety Committee (OTSC)

June 5, 2024, 10:00am – 12:00pm

Via MS Teams

Attendees:

Jaimie Bever (Chair/BPC), Brian Kirk (Ecology Alternate/BPC), Adam Byrd (Ecology Alternate/BPC), Haley Kennard (Ecology Alternate/BPC), Angela Zeigenfuse (Ecology Alternate/BPC), Megan Hillyard (Ecology Alternate/BPC), Laurie Wood (Ecology Alternate/BPC), Blair Bouma, (Pilot/PSP), Clyde Halstead (Tribal Government/Swinomish), Brian Porter (Tribal Government/Swinomish), Rein Attemann (Environment Alternate/WEC), Jason Hamilton (Commissioner/BPC), Tim Johnson (Oil Industry Alternate/WSPA)

1. Introductions & Meeting Minutes

Jaimie Bever (OTSC Chair/BPC) welcomed everyone to the meeting and introduced everyone to the Ecology Spills Program new Rule and Process Coordinator Megan Hillyard. Jaimie also introduced the Subject Matter Experts (SMEs) specifically invited for today's conversation: Keith Kridler, Artie Seamans, Tim Johnson, and David Corrie. Jaimie asked if the SMEs could talk about their experience. At that time, neither Keith nor Artie had joined the meeting.

Tim Johnson (Oil Industry Alternate/WSPA) clarified that he was not a tug SME. Antonio asked that he join as an alternate.

Captain Dave Corrie (Tug Industry/SME) just retired from Foss Maritime after a 45-year career. He worked on escort tugs, and during the last 10 years on the GARTH FOSS and LINDSEY FOSS. He is also a San Juan Islands resident with personal interest in the area.

Jaimie then described an online comment submission process for this rulemaking that will allow interested parties to share perspectives and feedback on draft rule language. The team will email the OTSC the link and provide the link to the comments form on the rule webpages, including Ecology's Public Input & Events webpage. She added that the OTSC may continue to send comments via email; They will submit a comment on the OTSC's behalf using the online comment form. The online comment submission process is important for several reasons: It provides a transparent and accessible way for stakeholders and the public to share their thoughts. It expands opportunities for public engagement, encouraging broader participation in the rulemaking process. This online record ensures that all comments are acknowledged, reviewed, and considered. The digital platform allows for easier submission and tracking of comments, reducing the administrative burden on our team.

All comments are stored in a single, searchable database, making it simpler to review, analyze, and respond to feedback.

Next, Jaimie asked for any comments or changes to the meeting minutes for 3/11 and 5/16. The minutes will be included in the packet materials for the June Board meeting being sent to the Board on 6/13.

Blair Bouma (Pilot/Puget Sound Pilots) asked that he be removed from the March attendance list, as he was not present.

2. Meeting Goal

Jaimie reviewed the objectives for the meeting, which were to:

- Review escort tug operational and functionality requirement ideas, and
- Come to consensus on which ideas to propose to the BPC.

3. Scope

Next, Jaimie reminded the group of the scope for the rulemaking, which will amend WAC 363-116-500 and, if needed, add new sections to Chapter 363-116 WAC. Where tugs are required, the rules will specify operational and functional requirements.

4. Geographic Zones Under Consideration

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.

Jaimie then passed the presentation over to Sara Thompson (Ecology Alternate/BPC).

5. Today's Discussion Topic

Sara explained that today's discussion topic will be on requirements for escort tug operational and functionality requirements. The goal was to use this meeting and the meeting in June 18 to develop and finalize recommendations to the Board related to proposed operational and functionality requirements for the tugs conducting the escorts required by this rulemaking.

6. Existing RCW 88.16.190

This slide contains the existing requirements for tug escorts, RCW 88.16.190, in the Pilotage Act. The existing operation and functionality requirement are shown in bold underline 'an aggregate shaft horsepower equivalent to at least five percent of the deadweight tons of a forty thousand deadweight ton oil tanker'. Adopting the existing horsepower-based escort standard is one option for consideration in this rulemaking.

7. Tug Operational and Functionality Ideas

During the second workshop, the team listened to feedback on the tug operational and functionality requirements. The discussion in workshop 2 suggested that the ideas in green were worthwhile to consider while the ideas in red were not.

Propulsion
Horsepower

Escort Equip
Auxiliary Equip

Tethering
Pre-Escort Conference
Certification
Escort Provider Training and drills
Deck fittings

Bollard Pull
Bollard Pull Testing

8. Discussion – Continue to Not Consider These Potential Requirements?

The ideas that did not appear to be a good fit for the rulemaking based on workshop 2 were: bollard pull, bollard pull testing, escort equipment (render-recovery etc.), and firefighting equipment.

Reasons why these might not be a good fit based on feedback received were:

Bollard pull – Not easy to verify, particularly if you're interested in indirect pull.

Bollard Pull testing – HSC voluntary standard of care.

Escort equipment (render-recovery etc.) – Nice to have but expensive and likely not necessary in our regional conditions.

Firefighting equipment – Better suited for a sentinel tug. Tugs providing escort services may not have space for this equipment and crews many not have training to fight fires beyond their own vessel.

Question for OTSC: Continue to not consider these potential requirements? Sara asked the OTSC to make a note and that they would be considered toward the end of the presentation.

9. Ideas for Discussion Today

The ideas that showed promise for consideration within the rulemaking were: horsepower, propulsion, certification, deck fittings, pre-escort conference, escort training and drills, and tethering.

10. Operational and Functionality Requirement Considerations

The next slide contained considerations to keep in mind when discussing these ideas.

Benefit of requirement

Drawbacks of requirement

Voluntary Options

Implementation and compliance

11. Functionality: Horsepower

Sara explained that this section of the presentation would be a round table discussion.

RCW: Aggregate shaft horsepower equivalent to at least 5% of a 40,000 DWT tanker (2,000).

Previous workshop discussion: Horsepower doesn't tell the whole story, but it is measurable and can be used to set minimum criteria.

Local usage: Horsepower used by local escort providers is 4,700 – 8,000.

Benefits	Drawback	Voluntary Approach	Implementation and Compliance
Assurance of power	Current 5% requirement may be insufficient, but a different requirement would result in inconsistent HP requirement for smaller versus larger tanker escorts.	Create new voluntary HSC SOC	Would need database of tugs meeting HP requirement to verify compliance. More challenging for unpowered vessels.

Round Table Comments:

PILOT: Blair Bouma (Pilot/Puget Sound Pilots) asked if the “5% of 40,000” requirement was imbedded in an RCW that could be changed at this time. Sara responded that there is access for the less than 40,000 tankers, ATBs, and barges, but not for the larger, over 40,000 tankers. Blair said that at 5%, the bottom end of the 40,000 is the 2,000-horsepower requirement. However, they have not used a tug with less than 4,700 horsepower. He said 2,000 would be adequate for an ATB or towed barge, but not for a tanker. He suggested adjusting the floor, if possible, up to 3,000 horsepower, would be more effective.

OIL INDUSTRY: Tim Johnson (Oil Industry Alternate/WSPA) questioned the Harbor Safety Committee Standards of Care (HSC SOC). He thinks using that would be an interesting concept. He wanted to know more about what that would look like. Sara responded that this idea came out of existing standards of care for escorting, recognizing that they were established before the change in vessels and size required to be escorted. She added that they would need to make a pitch to the HSC that there was interest in adopting new SOC. She reminded everyone that the SOC were voluntary not regulatory initiatives. The team has been regularly updating at the HSC and will do another one in August. She suspects they would be open to considering it. Tim offered that he thought it merited consideration of that approach. He wondered if looking at performance standards would be a good first step.

TUG INDUSTRY: Jeff Slesinger (Tug Industry/Delphi Maritime) offered a different approach. Considering the number of variables with equipment, vessels in the range for consideration, and the different places they go, it would be very difficult to come up with regulatory standards. His approach was simple. Yes, have escorts. Perhaps come up with a minimum threshold. But the bulk of the regulations should be institutionalizing the process that ensures that the pilots and tug operators go through case-by-case, job-by-job points regarding the job. And perhaps consider a guidance document, like SOC. Develop a process that covers those bases, but don’t tell them how to do it.

David Corrie (Tug Industry SME) agreed with Jeff that there were a lot of experts out in the field doing this work. They could be given outlines on how to do the job, but should be left with utilizing “masters discretion” to do it correctly. He agreed that there could be some minimums (horsepower and bollard pull).

TRIBAL: Clyde Halstead (Tribal/Swinomish) had no comments.

ENVIRONMENTAL: Fred Felleman (Environment/Friends of the Earth) said he was deferential to those working on the water. He appreciated the idea of setting a floor. He recognized that while the mariners were the best to make judgements, the folks concerned by costs may limit their ability to articulate their judgement. Therefore, may need the flexibility to not be constrained by cost cutting concerns. He also mentioned that when double hulls came in, there were exercises done, not just simulations but actual drills. If this is going to be a permanent

rule, he saw great value in doing some actual drills, perhaps starting with simulator, but then actually getting out there. Sara responded that they would be sure to include his comment about drills in the discussion around slide 16 if he was no longer in the meeting.

12. Functionality: Propulsion (Screw/Drive)

Previous workshop discussion: Tractor or Z drive are preferable for larger vessels, but twin screw is ok for smaller vessels. Local usage: Local escort providers have voith, Z-drive, or ASD propulsion.

Benefits	Drawback	Voluntary Approach	Implementation and Compliance
Assurance of maneuverability	<ul style="list-style-type: none"> Not required for larger (over 40,000 DWT) escorts. May not be necessary for under 40,000 DWT vessels. 	Create new voluntary HSC SOC	Would need database of tugs meeting propulsion requirement to verify compliance. More challenging for unpiloted vessels.

Round Table Comments:

PILOT: Blair Bouma (Pilot/Puget Sound Pilots) said there was a delineation in the 5-40k range where a conventional tug could be okay on the smaller end. In his opinion, on any ATB or towed barge, a conventional tug would likely be adequate. On the bigger, faster vessels, which require more tethering, a conventional tug is not an optimum configuration. Sara suggested they could consider different tankers versus barge and ATB escorts or different requirements for the 30k – 40k tankers. Blair could see that making sense. He added that massive tugs were being used on smaller vessel right now, which was inefficient. There could be a way to optimize environmental impacts while keeping an adequate size for the vessels.

Dave Corrie (Tug Industry SME) said at the very least, the requirement should be a twin-screw tug, whether the language keeps conventional or not. If a tug loses one engine, they can still function. It is uncommon for a tug to lose an engine, but it could happen.

OIL INDUSTRY: No comment.

TUG INDUSTRY: Jeff Slesinger (Tug Industry/Delphi Maritime) suggested having some faith in the market taking care of the need. The available tug fleet is now predominately Z drive or tractor because that’s what the market and the professionals doing the job demanded. He suggested they will likely see the same thing with the category of under 40k. Also, there has not been a major oil spill in this area due to a grounding. The market determined the best available technology and how to deploy it. It was a reasonable expectation to see the same thing with this new class of vessels.

Dave Corrie (Tug Industry SME) agreed with Jeff that industry has raised the bar on tugs. However, as the regulation is written, be aware that new players. Smaller companies may come in, but they need to show up with the right equipment. Sara agreed that looking at minimum requirements made sense.

TRIBAL: Clyde Halstead had no comments.

ENVIRONMENTAL: Fred Felleman (Environment/Friends of the Earth) appreciated the fact that equipment has improved over time. At the same time, he was amazed that there are still tugs built in the 1950’s working out on the water. He would like to see the mariners identify what they think would be the best if they had the choice, and then identify what that would be. He agreed with setting a floor.

Jim Peschel (Tug Industry Alternate/Vane Brothers) said they don’t currently have escort requirements for their vessels, but he checked if any providers they use were single screw, and the answer was no. He believes the market will at least have twin screw or Z drives available.

13. Functionality: Certification

Previous workshop discussion: There are many potential options (escort, noise). Concept that certification is unnecessary due to Subchapter M.

Benefits	Drawback	Voluntary Approach	Implementation and Compliance
Assurance of ability to conduct escort	<ul style="list-style-type: none"> • Not required for larger (over 40,000 DWT) escorts. • May not be necessary for under 40,000 DWT vessels. • Expensive • Limited number of escort certified vessels in the region 	?	Would need database of tugs meeting certification requirement to verify compliance. More challenging for unpiloted vessels.

Round Table Comments:

PILOT: Blair Bouma (Pilot/Puget Sound Pilots) referred to the tug industry.

OIL INDUSTRY: Antonio Machado (Oil Industry/WSPA) had no comments at that time.

TUG INDUSTRY: Jeff Slesinger (Tug Industry/Delphi Maritime) agreed with Captain Corrie regarding the twin screw requirement as well as considering a requirement regarding the age of the vessel but with certain asterisks. For instance, 25-30 year. But if a vessel had a current classed certificate, it could go beyond. There could also be a certificate for the type of propulsion. If a vessel exceeded the age limit but had a more modern system, allowances could be included for that vessel to be able to escort. That was just a suggestion to build a minimum requirement and that those types of certifications could be included. The certification piece would need to be part of a bigger picture.

TRIBAL: Clyde Halstead (Tribal/Swinomish) had no comment.

ENVIRONMENT: Fred Felleman (Environment/Friends of the Earth) replied that he was not qualified to make any further comments.

14. Functionality: Deck Fittings

Previous workshop discussion: Consider whether there should be requirements for bitt tonnage. This is currently best practice written into the Harbor Safety Plan.

Benefits	Drawback	Voluntary Approach	Implementation and Compliance
Assurance of strength of escort tug deck fittings	<ul style="list-style-type: none"> Not required for larger (over 40,000 DWT) escorts. May not be necessary for under 40,000 DWT vessels. 	Update to voluntary HSC SOC to include smaller tank vessel escorts	Would need database of tugs meeting deck fitting requirement to verify compliance. More challenging for unpiloted vessels.

Round Table Comments:

PILOT: Blair deferred to the tug SMEs. Keith Kridler (Pilot Alternate & SME/Puget Sound Pilots) replied that deck fittings were tricky because a lot of times it's related to the age of the vessel. Many times, one has to physically x-ray the wells and such. He thought it would be difficult to set any type of floor on fittings.

Dave Corrie (Tug Industry SME) said that if setting minimums, many companies would have to do a tremendous amount of engineering to make sure everything was compliant and holding up. He then asked if winches would be required. Any tug that was going to go out and escort has likely been engaging all those fittings prior to the escort. The hope is they are all holding up.

OIL INDUSTRY: No comments.

TUG INDUSTRY: Jim Peschel (Tug Industry Alternate/Vane Brothers) said that tug companies providing escorts participate in vetting programs through the oil industry and many require that tug companies stencil the strength of those deck fittings. But that is usually done when they were built and probably doesn't reflect what they are today.

Rein Attemann (Environment Alternate/WEC) asked if there were requirements to test the status and quality of the deck fittings over time? And were there ways to determine if they are weak? Jeff Stesinger (Tug Industry/Delphi Maritime) responded that other than class and inspections, there was no testing other than a visual test. An inspector may demand upon viewing that something be replaced. There are specific design requirements when the tugs are built about what those structural weights should be.

Blair Bouma (Pilot/Puget Sound Pilots) mentioned that there is a SOC in the Harbor Safety Plan (HSP) for bollard pull testing. In the PNW, the expectation is that companies do a full power test once every five years. It would test the entire boat, pulling full power for a fair amount of time. That is one practical test available. Jaimie asked about the compliance regarding the SOC. Blair responded that there was a five-year roll in period. Currently compliance was tepid. He said they would be discussing compliance at a meeting next week. The tethering SOC, on the other hand, has very high compliance. The SOC's are not regulatory and have no compliance requirement or enforcement, other than visibility and peer pressure. Sara responded that the OTSC might consider recommendations to the Board regarding updating the SOC to include the tug requirements for the 40k and up tankers.

TRIBAL: Clyde Halstead (Tribe/Swinomish) had no comments.

ENVIRONMENT: Fred Felleman (Environment/Friends of the Earth) had nothing to add at this time.

15. Operational: Pre-Escort Conference Conducted and Recorded Vessel Log 59:04

Previous workshop discussion: Consider requiring a pre-escort conference during which tethering, bollard pull, speed, and escort plan are discussed and agreed upon.

Benefits	Drawback	Voluntary Approach	Implementation and Compliance
Assurance that escort and escorted vessel have common understanding of escort plan	Add time to escort setup process	?	Challenging to verify compliance

Round Table Comments:

PILOT: Blair Bouma (Pilot/Puget Sound Pilots) said this was a critical part of the process. There was virtually no regulatory framework for this. Everyone needs to approach escorting not based on the 99% successful trips, but on that 1% chance of something going wrong. Most pilots use the old federal checklist even though there’s no legal basis anymore. He suggested that was a good starting point. But also, there are nuances in the vessels, especially size, since the federal checklist was written. Blair will send the reference to the federal list. Sara mentioned she had some examples from tug companies to reference as well.

Jim Peschel (Tug Industry Alternate/Vane Brothers) said they developed a form when they started escorting in Rosario and will send a copy.

Dave Corrie (Tug Industry SME) said this topic was extremely important. It mostly set expectations between the two masters. That’s where it all gets ferreted out. Jaimie asked how long the prep usually took. Blair responded ~ 5 mins and Dave agreed. Jaimie confirmed that this requirement would capture what’s already happening, not adding anything new. Blair didn’t think it was necessary to go granular in the regulations. Just set the expectations with the right objective of preventing or responding to any unforeseeable failure. Jeff Slesinger (Tug Industry/Delphi Maritime) suggested that if looking at it as a policy/procedure, the policy would explain the general goals and the procedures would be in a guidance document from the HSC. That would allow the professionals to work out in the HSC how granular to go. Dave added that either master could initiate the pre-escort conference.

OIL INDUSTRY: Tim Johnson (Oil Industry Alternate/WSPA) Agreed with comments by tug industry experts.

TRIBAL: Clyde Halstead (Tribe/Swinomish) had no comments.

ENVIRONMENTAL: Fred Felleman (Environment/Friends of the Earth) was baffled at the idea that pre-escort conferences may not be happening. He had no other comments. Jeff Slesinger (Tug Industry/Delphi Maritime) provided an example of how things could go sideways without specific guidance. There may be good intentions but unforeseen outcomes. This would plug that one little hole when there are different operators, weather, etc.

Fred concurred.

16. Operational: Escort Provider Training & Drills

Previous workshop discussion: Consider requirement for periodic drills to prove safe hookup in a live situation.

Benefits	Drawback	Voluntary Approach	Implementation and Compliance
Assurance of ability to safely hook up in emergency	Live drills are logistically intense and expensive	?	Would need database of tugs meeting training requirements.

Round Table Comments:

PILOT: Blair Bouma (Pilot/Puget Sound Pilots) offered that humans were the key with whether this particular one succeeds or fails. Encouraging some form of drills or training could be really good. He referenced the drills that ARCO and Polar conduct regularly. He said those are invaluable. Pilots also encourage small impromptu exercises in the normal courses of their work. If an opportunity presents itself, they practice various maneuvers. He wasn't sure how that could be a regulation. He knows that up in Valdez, every time the tanker sailed, the tugs asked if they wanted to do a drill. If not a regulation, some kind of encouragement would be good. It's important to practice those maneuvers.

OIL INDUSTRY: No comment.

TUG INDUSTRY: Jeff Slesinger (Tug Industry/Delphi Maritime) agreed with Blair. He wishes he had an answer for how to regulate training or set a standard, as it's such an important piece. It needs further discussion.

Dave Corrie (Tug Industry SME) concurred that standards would be hard to put together as there are many players and it's very expensive. He did say that simulators were very valuable and helpful.

Jim Peschel (Tug Industry Alternate/Vane Brothers) said that as a company that is escorted, they are under charter, which would make it difficult to do preplanned drills.

TRIBAL: Clyde Halstead (Tribal/Swinomish) had no comment.

ENVIRONMENT: Fred Felleman (Environment/Friends of the Earth) was unclear on the ongoing maintenance of a license for a tug operator. Could some of this be integrated into that? He liked the idea of practicing. He inquired about the fendering requirement, to the degree that rendering could be an extension of the training and perhaps incorporating into simulator work.

17. Operational: Tethering

Previous workshop discussion: Best to leave this decision to pilot or captain's discretion and to reference Puget Sound HSC SOC tethering areas

Local usage: Tethering is not required for newly escorted vessels. Standard for over 40,000 DWT vessels are in voluntary HSC SOC and Pilot Guidelines

Benefits	Drawback	Voluntary Approach	Implementation and Compliance
Faster time to control	Would take away some of mariner's discretion	Update to voluntary HSC SOC to include smaller tank vessel escorts	Challenging to verify compliance

Round Table Comments:

PILOT: Blair Bouma (Pilot/Puget Sound Pilot) responded that tethering or not tethering could be broken down into practical terms. The goal is keeping the vessel from touching the dirt. There are several factors that have to do with speed, distance from grounding point, how big the tank vessel is, and how big the tug is and what kind. Then when mashing those factors together one can come up with a rather clean decision on when to tether or not. With ATBs, the pilots have found that with simulator work and experience, areas about 1/2 mile from grounding points (i.e. Rosario) don't need tethering. The ATB will slow down enough to be brought under control before contact. However, in Guemes or Bellingham Channels, Sinclair or Vendovi, tethering is ideal. He suggested some guidance for setting expectation but could probably be done at the discretion of the operators. Sara asked is those items were documented in the pilot's guidelines. Blair said not currently. Pilots go through it in the escort training during their first year.

OIL INDUSTRY: Tim Johnson (Oil Industry Alternate/WSPA) had no comments.

TUG INDUSTRY: Jeff Slesinger (Tug Industry/Delphi Maritime) agreed with Blair and added that this would be one of the items on the pre-escort conference. HSC could include some of those guidelines in the SOC. For towed barges, there were different requirements. Therefore it's best to leave the decision to the pilot or master's discretion.

Dave Corrie (Tug Industry SME) also agreed with that. There are many safety factors in play when it comes to tethering including the design of the tug boat. He agreed 100% with pre escort conference covering this topic. TRIBAL: Clyde Halstead (Tribal/Swinomish) had no comment.

ENVIRONMENT: Fred Felleman (Environment/Friends of the Earth) mentioned a story he had seen regarding a former USCG who ran simulations on what could have avoided the DALI incident in Baltimore. The only answer was a tethered vessel. He wondered about simulations helping to inform boundary setting around this topic. He agreed in the real-life decision making of the masters.

18. Discussion: Regulatory Consistency Consideration

Any change to the operational and functional requirements would result in different requirements for tugs escorting newly escorted vessels (barges, ATBs, tankers under 40,000 DWT) than for tug escorting tankers over 40,000 DWT.

19. Discussion

Sara shared the notes she had been taking during the meeting. She reported:

General favor for continuing to look at horsepower with the thought that that they may want to try to set of minimum floor of 3,000 for certain vessels.

For propulsion – continue looking with similar thoughts as above.

For certification – talked about caveats for age but may not be something they want to pursue.

For equipment and deck fittings – in general there wasn't support for moving this into a regulation.

For Pre-escort – consider including at a high level and capturing at either BPC or HSC guidance documents. Those are the three that seem to be a possible consideration.

There were others for potential consideration in guidance documents, but not for codification: training/drills, tethering, bollard pull testing.

Continuing to be off the table is bollard pull, escort equipment, and auxiliary equipment.

Sara suggested this was a good start for the meeting on the 18th. She asked if anyone else should be included as SMEs for that meeting, or any other resources, to let the team know. The plan will be to form the recommendation. If unable, there is a meeting tentatively scheduled for August to wrap up the discussion.

Blair Bouma (Pilot/Puget Sound Pilots) suggested looking at the idea of a middle break point around the 30k tankers.

20. Workshops & Outreach

Jaimie reviewed the upcoming workshop schedule.

Dates	Activity
June 18, 2024	OTSC – Escort tug operation and capability
July 10, 2024	Stakeholder Workshop 8 - SEPA
July 16, 2024	Tribal Workshop 8 - SEPA
July 17, 2024	OTSC Workshop 8 - SEPA
August 2024	Potential OTSC
September 3, 2024	Stakeholder Workshop 9 - SEPA
September 10, 2024	Tribal Workshop 9 - SEPA
September 12, 2024	OTSC Workshop 9 - SEPA
October 24, 2024	SEPA SME discussion

21. Wrap Up

Jaimie asked if there were any general questions or comments from the group. She thanked them for the great discussion and providing their time and expertise on this very technical piece.

The meeting adjourned at 11:40am.