



STATE OF WASHINGTON
BOARD OF PILOTAGE COMMISSIONERS

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Meeting Minutes – Oil Transportation Safety Committee (OTSC)

February 13, 2024, 1:00pm – 2:10pm

Via MS Teams

Attendees:

Jaimie Bever (Chair/BPC), Brian Kirk (Ecology Alternate/BPC), JD Ross Leahy (Ecology Alternate/BPC), Sara Thompson (Ecology Alternate/BPC), Haley Kennard (Ecology Alternate/BPC), Angela Zeigenfuse (Ecology Alternate/BPC), Brittany Flittner (Ecology Alternate/BPC), Phil Hunter, (Pilot Alternate/PSP), Leah Harnish (Tug Industry Alternate/AWO), Clyde Halstead (Tribal/Swinomish), Antonio Machado (Oil Industry/WSPA), Rein Attemann (Environment Alternate/WEC), Peter Schrappen (Tug Industry Alternate/AWO), Kyle Burleson (Tug Industry Alternate/AWO), Laird Hail (USCG/Advisory), Jim Peschel (Tug Industry Alternate/Vane Brothers), Tim Johnson (Oil Industry Alternate/WSPA), Bettina Maki (BPC)

1. Welcome and Approval of the January 10, 2024 OTSC Meeting Minutes

OTSC Chair Jaimie Bever welcomed everyone to the meeting. Upon hearing no requested revisions to the January 10, 2024 OTSC meeting minutes, she determined they were finalized and would be provided to the Board at their January meeting as info.

2. Agenda

Jaimie introduced the topics for the meeting:

1. OTSC tasks
2. Filtering (Parameters vs. Variables)
3. Parameter filter results
4. Input from NGO representatives

3. OTSC Tasks

Jaimie then explained that the role of the OTSC was to provide recommendations to the Board at their upcoming March meeting to determine escort ideas to be evaluated in the EIS, as well as which elements of the environment the EIS should consider, which will be informed by the March 5 SEPA scoping session. She also explained decision process for making that recommendation. Only OTSC members vote, or their alternate if the appointed member is not at the meeting, with the majority and dissenting opinions being summarized in the recommendation document.

Regarding today's meeting, the OTSC was to listen to the presentation to develop understanding of

filtering parameters vs. filtering variables. And then, decide which parameters the OTSC would like to use to assess escort benefits for various variables (zones and vessel types).

At this point, Jaimie turned the presentation over to JD Ross Leahy (Ecology Alternate/BPC).

4. Filter Update – Parameters vs Variables

JD explained that tug escort analysis results have been the focus of presentations, and included in the report, and are presented in the context of the whole study area, including all covered vessel types. This allowed the most holistic look at the potential risk reduction of escort tugs – taking into effect their potential benefit as tugs of opportunity for other vessel types. This also allowed the modeling team to look at increases in escort traffic to and from areas where escorts are newly required. However, according to JD, it was just one way of looking at the data. The team built the model analysis to produce data that is flexible enough so that it can be looked at in more than one way.

JD then introduced “filtering”. The idea for using the analysis results to inform the rulemaking process was that the team could use the data presented in the tug escort report as a first step – to see areas of interest, or additional questions to look deeper into – filtering may be helpful.

When the concept was initially introduced, the primarily message was about changing how the results were communicated – adjusting the zones or vessels of interest. But there are two ways to make filtering changing – changing the parameters and changing the variables.

Changing parameters allows for adjustment of certain assumptions that were made for the report analysis. JD referenced the table on slide 5, which showed the adjustable inputs:

- Time to connect and control to a different number of minutes. The report used 30 minutes as an input parameter (assuming 15 minutes to connect and 15 to control).
- Turn on or off the ability of a ship to self-repair. The report used a self-repair distribution for simulated every loss of propulsion event, which meant that only about a third of simulated loss of propulsion events were simulated as being a “total loss of propulsion.”
- Turn on or off the ability for vessels to emergency anchor. The report allowed all vessels to anchor except towed oil barges and bunkering barges – but that can be changed by changing this parameter.
- Turn on or off allowing tugs of opportunity to rescue vessels that have suffered a loss of propulsion. The report allowed tugs of opportunity, but that can be switched off to help examine just the direct benefit of escorting – that is, the benefit just to those vessels that are under escort, and not the indirect benefit of adding escorts to the system.
- Turn on or off the Neah Bay ERTV and change the percentage chance of success for tug saves.

5. Parameters

On slide 6, JD explained that changing parameters can assist in understanding the impact of those parameters. The slide showed two examples – allowing barges to anchor, and tethering escorts. The main value of the results for today was to help the OTSC understand the impact they have on the results, and to consider whether the OTSC wants to see these changes included in the parameter set used moving forward.

6. Variables

JD then moved on to variables, explaining that they are the other type of filtering change available to the group. When the variables change, the model results don’t change, just how they are presented.

Result presentation can be changed by including or excluding different vessel types, different vessel statuses (like laden or unladen), and different zones. Changing variables helps to drill down on specific results for particular zones, and specific vessel types of interest in those zones.

7. Filter Update – Today’s Results

In terms of today’s topic, JD explained that there were several slides that covered the outputs for the filtering requests passed on by the rulemaking team. The slides were summarized versions of the results – designed to help the OTSC get a feel for what the filter is saying, and hopefully put the OTSC in a good position for determining what additional filters would be helpful to look at.

JD added that, however, the team did have the comprehensive results available for OTSC review and that those results were in the handout that was sent out with the meeting materials. As an example of what had been summarized, JD explained that the slides only included one oil spill risk metric – drift groundings, but all three metrics area available for review in the handout.

8. Filter Results Handout

Before getting into the filter requests and results, JD touched on the handout format explaining that each page of the document described a single filter request. The filter request was at the top, which was then followed by the outputs. For each metric, the percentage change is shown, with the absolute change in parenthesis. Below the results were the filters used. First, the parameters are shown. On the far right were two columns – the “report” column was unchanged for every filter request, because it showed the parameters used in the published tug escort analysis report. The Q1 column showed the parameters used to produce the outputs for the question – the column change was based on the filter request.

The next section was the variable selection, which showed the vessel types, sizes, and statuses included in the outputs, and the zones included in the outputs.

9. Filters Requested

JD explained that based on feedback at previous meetings, and the preferences of the rulemaking team, these filter requests were selected for this initial pass:

1. What is the change in risk if the model allowed all barges able to anchor?
2. What is the change in risk if the model assumed all escorts were tethered versus untethered?
3. What is the change in risk if the model assumed vessel of opportunity were not available versus available?

Those questions were all based on parameter changes – the results for those questions will be different from what was produced for the published report.

The next three questions were all based on changing variables. JD reminded everyone that this just changes which aspect of the results in the published report being focusing on – but not those actual results.

1. What is the risk reduction for each applicable vessel type in the combined Rosario and waters east zone?

2. What is the risk reduction for each applicable vessel type if escorts are required in the Admiralty inlet zone?
3. What is the risk reduction for each applicable vessel type if escorts are required in the Haro/Boundary zone?

10. Filter Results – Rosario and waters east combined

JD started this portion of the presentation by explaining the organization of the slides. The upper left was a grey callout box showing the Question number, which can be referenced in the handout to see the comprehensive results, and the filters used.

In the upper middle is the question being asked. In the upper right, is the geographic area being examined. The center of the slide showed the changes in drift grounding risk, with absolute values in parenthesis, and at the bottom was a blue box which contains the bottom-line conclusion.

This first filtering request asked: What is the reduction in risk for Rosario Strait; Bellingham Channel, Sinclair Islands and waters east; Guemes Channel and Saddlebags combined, when comparing Scenario 1 to Scenario 2?

Because this was a variable filter, the results weren't changing, just how they are being presented. The answer was about a 5.5% reduction in risk across vessel types. For that same combined set of zones, but just for vessel types targeted by the additional escort requirement, and just for the times when they were laden, there was a larger percentage of reductions:

- 26% reduction in risk for laden ATBs
- 52% reduction in risk for laden barges
- 23% reduction in risk for laden tankers <40,000

JD suggested the takeaway was that in looking at the overall impact of escorts to all vessel types, there is a smaller percentage benefit. But when focusing down on the benefit to vessels that are being targeted by the rule, that percentage benefit was quite a bit higher.

11. Filter Results - Anchoring

JD explained that the next three slides had a slightly different organization. They contain result boxes showing a left to right comparison. On left are report parameter results. On the right are the filter parameter results. JD reminded the group that this was a parameter change, therefore the results on the right side represented different outcomes from the model simulations.

This request asked: What is the reduction in risk for Rosario and connected waters east when anchoring is an option for towed oil barges?

The left side of the slide showed a 5.5% reduction in risk when barges couldn't anchor, compared to a 4.7% reduction when they could. That was a combined reduction across all vessel types but limited to just the Rosario and connected waters area.

When looking at just the tank barges, the comparison was different. There was a 52% reduction in risk

for tank barges when anchoring was not allowed, which dropped to a 43% reduction in risk when anchoring was allowed.

JD concluded based on the data that if towed oil barges were allowed to anchor, they produced slightly fewer drift groundings. Fewer drift groundings produced fewer opportunities for an escort to prevent a drift grounding. As a result, when barges were allowed to anchor, the risk reduction benefit of requiring escorts was lower.

12. Filter Results – Tethering Parameter

This request asked: What was the reduction in risk for Rosario and connected waters east when all escorts were tethered? Thinking back to the parameter slide, the report value for time to connect and control was 30 minutes. This parameter change dropped that down to 15 minutes. That is how the report simulated “tethering” so that is how the team responded to this filter request.

There was a 26% reduction in risk for laden ATBS when untethered, which rose to a 52% reduction when tethered. For laden tank barges, there was a 53% reduction in risk when untethered, which rose to 82% when tethered. For laden tank ships, there was a 23% reduction in risk when untethered, which rose to a 29% reduction when tethered.

This result suggests that if escorts weren’t tethered, there were more drift groundings. More drift groundings produced more opportunities for an escort to prevent a drift grounding. When escorts were tethered, the risk reduction benefit of adding escort requirements was higher.

13. Filter Results – TOO Parameter

This request asked: What is the reduction in risk for Rosario and connected waters east when tugs of opportunity are not available to assist?

Removing the ability of tugs of opportunity to assist results in a simplification of model results. In the report, tugs of opportunity provided indirect benefits to tank vessels and non-tank vessels alike – their benefit was hard to pin down, since it changed depending on the geographic distribution of tugs – which was in turn affected by escort requirements.

When tugs of opportunity were removed, only the direct benefit of escort tugs is shown – that is – the benefit to the vessel being escorted and that was all.

There was a 26% reduction in risk for laden ATBS when tugs of opportunity were allowed – the reduction rise to a 32% when disallowed. For laden tank barges, there was a 53% reduction in risk when tugs of opportunity were allowed, which rose to 66% when not allowed. And for laden tank ships, there was a 23% reduction in risk when tugs of opportunity were allowed, which rose to a 26% reduction when disallowed.

If tugs of opportunity were not allowed to assist, there were slightly more drift groundings. More drift groundings produced more opportunities for an escort to prevent a drift grounding. When tugs of opportunity were allowed, the risk reduction benefit of adding escort requirements was higher.

14. Filter Results – Parameter Comparison

JD suggested that it was easy to get lost in the details when looking at the changes in parameters. Therefore, he put together a slide to help compare the magnitude of the changes across parameters. Allowing barges to anchor reduced the benefit of escorts about as much as tethering escorts increased their benefit. Out of all parameter changes, disallowing tugs of opportunity had the largest effect. But overall, these were relatively nuanced changes to the results as initially presented in the report under report parameters.

15. Filter Results – Admiralty Inlet

When the scope of work for the report was initially developed, the idea for Scenario 3 was to expand would the requirements for escorts across all zones. In that way, the hope was to draw out the zones where escorts were providing the highest benefit – and then look deeper into those zones as possible candidates for escort requirement expansion.

JD reminded that group that two zones stood out from the Scenario 3 comparison – Haro Strait and Boundary Pass, and Admiralty Inlet. As part of the filtering requests, the rulemaking team requested an examination of each of the zones, breaking out the benefits of escorting by vessel type by zone. The idea was to examine which of the three newly escorted vessel types was benefitting the most from the newly required escorts.

He then showed the results of the three vessel types on slide 17 with laden tank barges seeing the most benefit in terms of drift groundings saved. However, there was another, more important take away. JD explained that almost 90% of the benefit in Admiralty appeared to be from non-tank vessel saves. This was because non-tank vessels experienced an indirect benefit from changing the geographic distribution of tugs of opportunity. This suggested that the parameter selection to allow tugs of opportunity was confounding the ability to evaluate Scenario 3 benefits for each zone, by vessel type. To compare benefit by zone, it will need to be done with tugs of opportunity removed.

16. Filter Results – Direct Benefit Only

Although this was not one of the requested filters, the rulemaking team, based on the results shown on the last slide, requested a look across all BPC zones with tugs of opportunity disallowed. This filter answered the question, which zones see the highest absolute reduction in drift groundings, when tugs of opportunity are not allowed to assist?

Taking tugs of opportunity away like this, allowed us to compare results across all zones and scenarios. This list of zones showed that when compared based on direct benefit, different zones showed up higher in the list than what we saw in the report. JD did want to say, that in producing these numbers, the team noticed some unexpected results for some of these zones, and that they are looking into that. JD said that for the next OTSC meeting, when they rerun whatever parameters were settled on today, they expect to have slightly different results for a few of these zones.

Overall, Puget Sound was far and away where escorts had the most direct benefit compared to other zones.

17. Proposed Parameters

Jaimie Bever (OTSC Chair/BPC) thanked JD for walking the committee through the data. She thought it was interesting to see just how much an effect the parameters have on the results. She explained that one of the primary goals for today's meeting was to settle on a set of parameters the committee was comfortable with, to allow comparison across the zones to determine which zones benefits were most helpful.

She added that as a rulemaking team, based on the results shared with the OTSC today, they suggest the best approach was to:

- reduce the time to connect and control to 15 minutes, from 30 minutes
- allow tank barges to anchor
- and remove the ability of tugs of opportunity to save vessels.

Removing the tugs of opportunity would allow the team to see the direct benefit of escorts by zone. Allowing anchoring for towed oil barges would address an OTSC member's concern, and reducing time to connect and control to 15 from 30 minutes would bring it more in line with the experience of local pilots.

In conclusion of the presentation portion, she explained that the purpose of the presentation was to get OTSC perspective, input, and feedback. She added that if an OTSC member thought a different set of parameters would be a more valuable approach, the team would welcome that feedback.

18. OTSC Discussion

So, what do you think, what should the final parameters be for the results that we share at the upcoming OTSC meeting?

Jeff Slesinger (Tug Industry/Delphi Maritime) inquired about the rationale for the difference in allowing or not allowing anchoring between a towed oil barge versus a towed bunkering barge. JD responded that those were the only two vessel types simulated in the model that were not allowed to anchor. They were treated as different vessel types in the model, so they were broken out as different parameters in the presentation slides. JD added that the bunker barges weren't escorted in the model and were not under consideration. They could, however, be considered like a container ship. But if looking at the direct benefit of escorts, they would not see a benefit. That said, if people felt it was important for consistency, it could be further discussed. Jeff then asked why it was listed as a category if the rule did not apply to it. Sara Thompson (Ecology Alternate/BPC) said that the team wanted to be transparent with all possible parameters and that those presented were the ones from the report. That was why it wasn't eliminated from the slide. JD added that there were other filtering approaches where bunker barges would affect the results. Their treatment was relevant, just not in this filter.

Jaimie read from the chat a message from Antonio Machado (Oil Industry/WSPA): Overall ship pilots training, experience, situational awareness, navigation aids, and adherence to safety protocols are parameters that contribute to their ability to avoid groundings and safely navigate vessels in various maritime environments. Could that be considered another parameter: pilots? JD thanked Antonio for his comment, adding that the answer was no, not in the current iteration of model development. The model does not incorporate the ability to be used in that way. Sara added that the safety factors from

the pilots were baked into the feeds to model, coming out in the occurrences and the LOPs. That was how they were being accounted for, not as a parameter that could be turned on or off.

Jim Peschel (Tug Industry Alternate/Vane Brother) appreciated the analysis of the anchoring. His comment in the chat regarding anchoring was before he had a chance to look at the slide deck. Further to Jeff's comment, Jim thought it was odd that the risk of spill from a bunker barge was considered but not the benefit if they were allowed to self-arrest. He was more concerned that the analysis on slide 13 seemed counter intuitive, that by having the ability to self-anchor, it reduced the effectiveness of escorts because they occurred less frequently. To an outside observer, the ability to anchor appeared to make it less effective, when the reality is that it was more effective. JD acknowledged that it was confusing but that the final analysis was to determine how helpful escorts were, not how safe barges were. The safer barges were, the less helpful it was to have an escort.

Laird Hail (Advisor/USCG) agreed with the changing of the timeframe to connect based on pilots' experience and the anchoring of the towed barges. However, he disagreed with taking out the opportunity for tugs of opportunity because they are used. When VTS gets a call regarding loss of power, the first thing they do is look for tugs in the area that could be of assistance. By making that a "no", it divorced it from reality. JD agreed that it was an important point Laird was bringing up. The filtering process was about helping the OTSC and the rulemaking team make decisions. It was not about figuring out the perfect way to run the model so that it was closest to reality. To include it would make it hard for the OTSC and rulemaking team to see where escorts would be most beneficial just for the target vessels they're escorting. That would be the question this filter was addressing. He added that there was a secondary more nuanced question about indirect benefit considerations. In looking from that perspective, the tugs of opportunity filter may need to be turned back on.

Jeff Slesinger (Tug Industry/Delphi Maritime) asked to go back to slide 17 and for JD to explain what the percent reductions were compared to. He also wondered why the absolute numbers were the same. JD responded that all ATBs were compared to all ATBs. It was a 67% reduction for all ATBs. The ATBs on the right of the slide were the same two. But the comparison was laden ATBs to laden ATBs. He reminded everyone that they were very small numbers. And that changing the variables didn't change the results. JD added that if they were seeing an indirect benefit such as from tugs of opportunity the results would only show for laden vessels.

Sara wanted to circle back to the slide regarding towed bunker barges. She heard from an OTSC voting member that there was interest in changing that to a "yes". She was looking for consensus from the OTSC. Laird Hail (Advisor/USCG) suggested parenthetically expressing that towed oil barges didn't include towed bunker barges. The group agreed to leave it at "no" with an annotation that they weren't included.

Jaimie reminded that group that the team was looking for direction on the recommended filters. She asked for any final comments or questions prior to the vote.

Rein Attemann (Environment Alternate/WEC) commented that he was the alternate for the environmental community standing in for Fred Felleman and that they were not prepared to vote without checking with Fred. JD added that there was a number of filtering requests received and even with the vote, additional input and requests will be considered in the process.

Phil Hunter (Pilot Alternate/PSP) agreed with the three changes. Regarding tugs of opportunity, he suggested it was a very complex parameter. There were times when there was no one around.

Jaimie then collected the vote for moving forward with the three proposed parameters:

Clyde Halstead (Tribe/Swinomish) – Yes

Antonio Machado (Oil Industry/WSPA) – Yes

Jeff Slesinger (Tug Industry/Delphi Maritime) – Yes

Environment – Abstain – Rulemaking team will meet with Fred outside of this meeting

Phil Hunter (Pilot Alternate/Puget Sound Pilots) – Yes

Jaimie declared that the majority of the members have approved moving forward with the three proposed parameters.

19. Upcoming OTSC Meeting

Jaimie reminded everyone that the next OTSC meeting was on February 28 where the group would review zone results for escorted vessel types and begin drafting recommendations to the Board regarding escort ideas.

20. NGO Filter Requests & Info Requests

The slides at the end of the presentation deck were developed to respond to the letter received by the OTSC from the NGO community. This letter contained specific filter requests, outlined on slide 22, as well as responses to specific questions outlined on slides 23, 24, 25, and 26.

Meeting adjourned at 2:10pm.