

## Grays Harbor Vessel Traffic Risk Assessment (GHVTRA) Tribal and Stakeholder Input Received on the Preliminary Draft Report, November 2018

Sequence #	Comment #	Page #	Table/Figure #	Comment	Point of Contact	Ecology Response	Report Change?
1	CF-1	6	Executive summary	Grays Harbor Overview: Add more description: Approx 90 sq miles generally shallow averaging 20 feet out side of channels. (Confirm numbers in my suggestion)	Larry Thevik, Commercial Fishing Representative	Overview of Grays Harbor quotes the description from Coast Pilot 7.	No
2	CF-2	7	ES first Paragraph	Insert after NOAA: Recent Port of Grays Harbor study (2012)Commercial fishing generates \$220,000,000 in annual business activity from the Westport Marina. MAKE THIS CHANGE CONSISTENT THROUGHOUT DOCUMENT	Larry Thevik, Commercial Fishing Representative	Added reference to 2013 Economic Impact of the Port of Grays Harbor report.	Yes
3	CF-3	7	ES P 4	Insert after "Harbor" <u>are limited and managed</u> ..... MAKE THIS CHANGE CONSISTENT THROUGHOUT DOCUMENT	Larry Thevik, Commercial Fishing Representative	Modified language as suggested.	Yes
4	CF-4	9	ES P3	After Second sentence (S2) insert: <u>There are presently no crude oil or heavy petroleum laden tankers or oil barges transiting Grays Harbor</u> . MAKE THIS CHANGE CONSISTENT THROUGHOUT DOCUMENT	Larry Thevik, Commercial Fishing Representative	Added sentence indicating there are no crude oil movements by vessel in Grays Harbor. Did not include petroleum-laden, since some chemical tankers calling on Grays Harbor could be carrying refined products.	Yes
5	CF-5	11	Last Bullet	Add at end: <u>Discuss additional alternatives to distribute Tow Lane maps to fishing fleet and towboat operators</u> MAKE THIS CHANGE CONSISTENT THROUGHOUT DOCUMENT	Larry Thevik, Commercial Fishing Representative	Modified language as suggested.	Yes
6	CF-6	12	Under GHSC Bullet 5	Delete "Establish Processes" change to: <u>Consider ways</u> MAKE THIS CHANGE CONSISTENT THROUGHOUT DOCUMENT	Larry Thevik, Commercial Fishing Representative	Modified language as suggested.	Yes
7	CF-7	15	After Bullet2	Insert new bullet: <u>With Grays Harbor Pilots consider including in :Standards of Care" need for laden tankers with multiple bulk liquid products to declare the nature of the product not a part of the transaction in Grays Harbor but still aboard tanker while in transit in Grays Harbor and vicinity. . MAKE THIS CHANGE CONSISTENT THROUGHOUT DOCUMENT</u>	Larry Thevik, Commercial Fishing Representative	Added recommendation for Grays Harbor Pilots and the Port of Grays Harbor consider establishing accounts with the Department of Homeland Security Ship Arrival Notification System to receive advance notice of ship arrivals, including information about cargo onboard.	Yes
8	CF-8	17	P1	After S3 insert new sentence: <u>The bay covers approximately 90 square miles and averages less than twenty feet in depth outside channels.</u> (Need to confirm suggested numbers)	Larry Thevik, Commercial Fishing Representative	Overview of Grays Harbor quotes the description from Coast Pilot 7.	No
9	CF-9	19	PI	After last sentence insert new sentences; <u>Recent Port of Grays Harbor study (2012) states: Commercial fishing generates \$220,000,000 in annual business activity from the Westport Marina. Combined Commercial and Recreational business activity is estimated at \$232,000,000 annually.</u>	Larry Thevik, Commercial Fishing Representative	Added reference to 2013 Economic Impact of the Port of Grays Harbor report.	Yes
10	CF-10	19	P7	Insert after "Harbor" <u>are limited and managed</u> .....	Larry Thevik, Commercial Fishing Representative	Modified language as suggested.	Yes

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11	CF-11	22	P3	After Second sentence (S2) insert: <u>There are presently no crude oil or petroleum laden tankers or barges transiting Grays Harbor.</u> . MAKE THIS CHANGE CONSISTENT THROUGHOUT DOCUMENT	Larry Thevik, Commercial Fishing Representative	Added sentence indicating there are no crude oil movements by vessel in Grays Harbor. Did not include petroleum-laden, since some chemical tankers calling on Grays Harbor could be carrying refined products.	Yes
12	CF-12	31	Factor 29	Rewrite to state: Factor 29: <u>Marine debris may influence collision, allision, and grounding risk by posing a hazard to navigation that commercial vessels could have to maneuver around, and by presenting a risk that marine debris could get caught in a commercial vessels propeller or running gear, possibly resulting in a loss or reduction in propulsion or steering.</u> Discussion: As I noted in separate comments on this issue marine debris can be comprised of many things including a lost net or other lost fishing gear. Specific mention of nets which are only used in the upper reaches of the Harbor (primarily by tribal fishers) and only for limited times and the specific reference to "derelict" gear is unnecessary and redundant. A specific mention of the potential hazard of a large number of crab pots spilled by a vessel as a potential hazard is identified in Factor 31. MAKE THIS CHANGE CONSISTENT THROUGHOUT DOCUMENT	Larry Thevik, Commercial Fishing Representative	Modified language as suggested.	Yes
13	CF-13	31	Factor 31	Assuming Factor 29 is modified as mentioned above then Factor 31 could be re-written to state: <u>Loss of a large number of crab pots in the channel could influence grounding and allision risk by posing a hazard to navigation that vessels may have to maneuver to avoid and if not avoided could get caught in a commercial vessels propeller or running gear, possibly resulting in a loss or reduction in propulsion or steering.</u> MAKE THIS CHANGE CONSISTENT THROUGHOUT DOCUMENT	Larry Thevik, Commercial Fishing Representative	Modified language as suggested.	Yes
14	CF-14	31-32	Factor 37	Factor 37: Re-write to state: <u>High winds may increase the likelihood of having to secure cargo for fueling operations, and high winds and strong currents can impact the safety and effectiveness of pre-booming.</u> MAKE THIS CHANGE CONSISTENT THROUGHOUT DOCUMENT	Larry Thevik, Commercial Fishing Representative	Factor 22, Current Strength and Variability, notes impact on oil transfer pre-booming safety and effectiveness.	No

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15	CF-15	32	Additional Discussions sub bullet 2	Eliminate sub bullet 2. Loitering activity has been observed closer than 25 miles and likely within 4 miles during last several years. MAKE THIS CHANGE CONSISTENT THROUGHOUT DOCUMENT	Larry Thevik, Commercial Fishing Representative	Removed sub-bullet as suggested.	Yes
16	CF-16	32	Tugs and Tows	Add bullet: Tows operating outside of agreed tow lanes can present additional risk for collision, and allision. MAKE THIS CHANGE CONSISTENT THROUGHOUT DOCUMENT	Larry Thevik, Commercial Fishing Representative	Added bullet as suggested.	Yes
17	CF-17	47	Commercial Fishermen	Bullet 2 Add after last sentence: : <u>Discuss additional alternatives to distribute Tow Lane maps to fishing fleet and towboat operators.</u> MAKE THIS CHANGE CONSISTENT THROUGHOUT DOCUMENT	Larry Thevik, Commercial Fishing Representative	Modified language as suggested.	Yes
18	CF-18	47	GHSC Bullet 6	Bullet 6 Delete "Establish Processes" change to: <u>Consider ways</u> MAKE THIS CHANGE CONSISTENT THROUGHOUT DOCUMENT	Larry Thevik, Commercial Fishing Representative	Modified language as suggested.	Yes
19	CF-19	48	Factor 29	Rewrite to state: Factor 29: <u>Marine debris may influence collision, allision, and grounding risk by posing a hazard to navigation that commercial vessels could have to maneuver around, and by presenting a risk that marine debris could get caught in a commercial vessels propeller or running gear, possibly resulting in a loss or reduction in propulsion or steering.</u> Discussion: As I noted in separate comments on this issue marine debris can be comprised of many things including a lost net or other lost fishing gear. Specific mention of nets which are only used in the upper reaches of the Harbor (primarily by tribal fishers) and only for limited times and the specific reference to "derelict" gear is unnecessary and redundant. A specific mention of the potential hazard of a large number of crab pots spilled by a vessel as a potential hazard is identified in Factor 31. MAKE THIS CHANGE CONSISTENT THROUGHOUT DOCUMENT	Larry Thevik, Commercial Fishing Representative	Modified language as suggested.	Yes
20	CF-20	48	Factor 31	Assuming Factor 29 is modified as mentioned above then Factor 31 could be re-written to state: <u>Loss of a large number of crab pots in the channel could influence grounding and allision risk by posing a hazard to navigation that vessels may have to maneuver to avoid and if not avoided could get caught in a commercial vessels propeller or running gear, possibly resulting in a loss or reduction in propulsion or steering.</u> MAKE THIS CHANGE CONSISTENT THROUGHOUT DOCUMENT	Larry Thevik, Commercial Fishing Representative	Added reference to 2013 Economic Impact of the Port of Grays Harbor report.	Yes

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21	CF-21	50	Oil Transfers	Factor 37: Re-write to state: <u>High winds may increase the likelihood of having to secure cargo for fueling operations, and high winds and strong currents can impact the safety and effectiveness of pre-booming.</u> MAKE THIS CHANGE CONSISTENT THROUGHOUT DOCUMENT	Larry Thevik, Commercial Fishing Representative	Factor 22, Current Strength and Variability, notes impact on oil transfer pre-booming safety and effectiveness.	No
22	CF-22	98-122	Spills from vessels under 300 tons	While the number of spills from smaller vessels (under 300 tons) is much more frequent than commercial vessel spills, and every gallon of spilled oil represents some damage to the environment it is important to recognize the scale of volumes spilled as well as number of incidents. The last major oil spill from commercial vessel activity off of Grays Harbor was the Nestucca oil barge in 1988 of 231,000 gallons of heavy bunker oil. That one spill amortized over 30 years represents a spill of 7,700 gallons per year. The 96 incidents of spills (within 25 miles of Grays Harbor) by small vessels amortized over 11 years (data set presented) is approximately 770 gallons per year.	Larry Thevik, Commercial Fishing Representative	Comment noted.	No
23	OC-1	9		Anchorage: Grays Harbor Pilots: Would the off channel designated anchorages be part of the dredging program for the channel?	Al Carter, Safety and Compliance Manager, Ocean Companies	Discussions during the Hazard Identification workshops did not address this topic. Recommend discussion with USCG Sector Columbia River and US Army Corps of Engineers Seattle District at Grays Harbor Safety Committee meetings regarding whether designated anchorages outside the navigation channel would be included in the USACE dredging program.	No
24	OC-2	23/24		Anchorage: There are a limited number of non-designated anchorage areas used by Grays Harbor Pilots. Some are partially within the channel. Should those areas be included in the dredging program for the channel? Since they are being used for anchorage they should be included in the dredging program.	Al Carter, Safety and Compliance Manager, Ocean Companies	Discussions during the Hazard Identification workshops did not address this topic. Recommend discussion with USCG Sector Columbia River and US Army Corps of Engineers Seattle District at Grays Harbor Safety Committee meetings regarding whether designated anchorages outside the navigation channel would be included in the USACE dredging program.	No
25	OC-3	25		Factors 13/14: Channel depth and width should be included in the channel dredging program. With little or no room to maneuver already, the depth and width becomes shallow and narrow.	Al Carter, Safety and Compliance Manager, Ocean Companies	Factor 17 addresses channel width.	No
26	OC-4	27		Factor 31: All crab pots are marked with a buoy showing ownership. Any pots located in or around the channel should immediately be reported so they can be retrieved.	Al Carter, Safety and Compliance Manager, Ocean Companies	Factor addressing crab pots is number 33 in the draft report, due to a partial reorganization of the list of local factors. Added note to Factor 33 regarding buoys showing ownership.	Yes

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27	OC-5	27		Factor 35: There should be a response vessel that can respond to ships in distress or on fire. With the number of vessels calling on the port and the number of commercial vessels involved in fishing we are long overdue for a response vessel in Grays Harbor.	Al Carter, Safety and Compliance Manager, Ocean Companies	Factor addressing fire and explosion is now Factor 26 due to a partial reorganization of the list of local factors. Added recommendation to consider the availability and adequacy of on-water firefighting response capability (e.g., tugs with fire monitors or dedicated response vessels).	Yes
28	OC-6	35		Factor 3: Anchorages within the channel: As stated above the non-designated anchorages should be included in the dredging program.	Al Carter, Safety and Compliance Manager, Ocean Companies	Discussions during the Hazard Identification workshops did not address this topic. Recommend discussion with USCG Sector Columbia River and US Army Corps of Engineers Seattle District at Grays Harbor Safety Committee meetings regarding whether designated anchorages outside the navigation channel would be included in the USACE dredging program.	No
29	PG-1	5		Bar and Approaches – Grays Harbor Pilots. The first two bullet discuss radio broadcasts to notify vessels that pilot boardings are occurring and vessel intentions. The practices of radio notification is an option the pilots can use. It may be appropriate for the GH Safety Committee to discuss this as a practice, however the recommendation should be modified to only refer to a Securite broadcast. A Pan-Pan broadcast is used in urgent and distress situations and is not appropriate for an information broadcast about pilot boardings and movements. Determinations of vessels restricted in their ability to maneuver, and the appropriate lights/day shapes are all covered by the international rules of the road. The pilots and vessel captains are well aware of the requirements of the rules. It is not appropriate for a local body to adopt a procedure other than indicating they pilots and vessels should comply with the requirements of the rules of the road at all times.	Randy Lewis, Director of Environmental and Engineering Services, Port of Grays Harbor	Modified language as suggested.	Yes
30	PG-2	6		Fishing Vessels and Fishing Gear – Coast Guard Sector Columbia River. The last sub bullet discusses establishing a Coast Guard Auxiliary program in Grays Harbor. A program has been in place for years. I know several people have left and it may not be currently active, but I have seen ads for boating safety clinics and classes in the paper of the last couple of years. A call to the Coast Guard Station at Westport should be made to verify the status. If a program isn't in place the recommendation is correct and can remain. If one exists then it needs to be modified to at least indicate the program should be expanded or if the Coast Guard feels it is active then this needs to be dropped.	Randy Lewis, Director of Environmental and Engineering Services, Port of Grays Harbor	Per discussion with Coast Guard Station Westport there is no active Coast Guard Auxiliary in Westport; the closest Auxiliary unit is in Ilwaco.	No

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31	PG-3	6,7		Fishing Vessels and Fishing Gear – Area Tribes, Commercial fishermen and GH Safety Committee. There are several bullets in these sections that at basically repeats, although there are minor changes between a couple. They all start with Continue to encourage participation in Harbor Safety Committee..... I recommend these be removed from the tribal and fishermen sections and kept in the safety committee section. There are other recommendations to both those groups that are applicable and appropriate.	Randy Lewis, Director of Environmental and Engineering Services, Port of Grays Harbor	Ecology believes there is value in retaining the recommendations for each group, to highlight potential actions that could be taken.	No
32	PG-4	19		Timeframe. This is a repeat of comments submitted earlier. I do not feel it is appropriate to include the company names on the project titles that were included in this section. The names BHP and Contanda should be removed and the titles changed to Proposed Potash Export Facility and Proposed Expansion of Existing Bulk Liquid Terminal. This should be done throughout the document.	Randy Lewis, Director of Environmental and Engineering Services, Port of Grays Harbor	Modified language as suggested.	Yes
33	PG-5	28		Vessels Loitering Offshore. The first bullet states that participants noted commercial vessels loitering as close as 4 nautical miles. One participant made that statement and the bullet should be changed to reflect that. The next bullet clarifies this was discussed by the group and the results of that.	Randy Lewis, Director of Environmental and Engineering Services, Port of Grays Harbor	Modified language as suggested.	Yes
34	QN(L)-1	-		The GHVTRA Document and process to date is minimizing the QIN treaty rights. The document is currently written in a manner that combines all tribes rather than differentiating between Treaty and non-Treaty tribes. This approach inappropriately puts tribes on an equal footing. Only the QIN has Treaty-reserved rights to fish, hunt, and gather within the Grays Harbor area. These rights bring higher obligations to the QIN based on the trust responsibility to protect those Treaty rights. This should be clarified in the document, and when referring to “tribes” in the document language should specifically identify the Quinault Indian Nation.	Daniel Ravenel, Environmental Protection Manager, Quinault Indian Nation	Revised language throughout the document to clarify intent and meaning.	Yes
35	QN(L)-2	6, 42		Additionally, on pages 6 and 42 there are references to coordinating with the Northwest Indian Fisheries Commission. These references need to be deleted because the NWIFC does not play a role in managing or regulating Treaty-reserved fisheries in Grays Harbor. On page 14 there is a statement about historical use of Grays Harbor by tribes other than the Quinault Indian Nation that appears to indicate there is current use by these tribes. There is no current use of Grays Harbor by other tribes. See attached line-by-line details for more detail.	Daniel Ravenel, Environmental Protection Manager, Quinault Indian Nation	Removed references to Northwest Indian Fisheries Commission.	Yes

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36	QN(L)-3			The document describes several traits related to the Grays Harbor facility that increase risk to vessels in transit, including high winds, limited visibility from fog, and high currents, but it does not describe any measures to minimize the risks to vessels in transit during extreme conditions. Currently the process depends on the judgement of the pilot and the skills of the vessel master, thus increasing the potential for human error to contribute to an accident, or even a spill. While the pilots have a good history of avoiding problems, the potential increase in vessel traffic will increase the risk to the environment. In addition, the Grays Harbor pilots are highly experienced but approaching retirement. Also, it is known that they are having difficulties recruiting new pilots and new pilots will not have the decades of experience on Grays Harbor possessed by the current pilots. Thus, given the known increased risks from high winds, limited visibility, and tidal current, we recommend that restrictions be put in place preventing vessel transits during these high-risk situations.	Daniel Ravenel, Environmental Protection Manager, Quinault Indian Nation	Ecology does not have authority to restrict the movement of vessels. The report notes the Coast Guard's authority to restrict passage or close the Grays Harbor Bar to commercial vessels, and the Grays Harbor Pilots' ability to suspend pilotage service to commercial vessels. Additionally, the report references the Grays Harbor Safety Plan, which includes a standard of care for operations in severe weather.	No
37	QN(L)-4			There are many references of increased risk related to issues of lack of maintenance for navigation aids, and references to increased grounding hazards due to submerged hazards such as the submerged portion of the south jetty. This is combined with reference to other hazards related to lack of current information such as a recent comprehensive survey. The document needs to provide clear guidance on what is needed to reduce hazards related to these deficiencies in the maintenance of these essential aids.	Daniel Ravenel, Environmental Protection Manager, Quinault Indian Nation	The draft report notes ongoing coordination between the Coast Guard and waterway users regarding aids to navigation and the 2015 Waterways Analysis and Management System (WAMS) study and the Coast Guard plan to address discrepancies with aids to navigation. The draft report references the Grays Harbor Safety Plan, which includes a standard of care for aids to navigation. The draft report includes recommendations regarding discrepancies with aids to navigation, and a future WAMS study.	No
38	QN(L)-5	7, 43		The document, while being advisory, only minimally addresses safety issues; it is often limited to having safety recommendations couched with terms such as "consider" and other similar terms. Such a voluntary approach could reasonably result in no safety improvements. At the same time, on pages 7 and 43 under Grays Harbor Safety Committee, the document uses the term "establish" rather than "consider" for actions associated with Treaty fishing. This change in terms that indicate required actions for Treaty fishers to change how they fish in or near the navigation channel and tow lanes, yet nearly every statement related to the large vessel operations using the term "consider," making any changes voluntary. The different approach related to fishers' action appears to provide an approach that is willing to sacrifice Treaty reserved fishing to support large vessel traffic. That is unacceptable to the QIN.	Daniel Ravenel, Environmental Protection Manager, Quinault Indian Nation	Revised language to indicate all of the high-level recommendations in the draft report represent a qualitative, inclusive listing for consideration by waterway users	Yes

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39	QN(L)-6	37		On page 37 under Factor 9, the document states “older vessels or vessels that have not been well maintained may be more likely to experience structural failure or flooding casualties while crossing the bar.” Earlier in the document it mentions that applicable rules were changed following the notable spills in 1988 and 1989 (Nestucca, and Exxon Valdez), and this statement seems to contradict this earlier statement. We recommend actions necessary to prevent the use of these older or unmaintained vessels from operating in or near Grays Harbor.	Daniel Ravenel, Environmental Protection Manager, Quinault Indian Nation	Ecology does not have authority to limit the type or age of vessels operating in Grays Harbor. The draft report notes existing safety measures relevant to Factor 9 that were discussed during Hazard Identification Workshop 1. These measures include global safeguards, such as the USCG Port State Control Program and the role of the International Maritime Organization, USCG, and Classification Societies in vessel construction and operation; and local safeguards such as Ecology vessel inspections and oil transfer inspections.	No
40	QN(L)-7			The GHVTRA did not address potential increases in vessel traffic related to the currently proposed operations, including REG and Contanda’s proposals to increase their biodiesel capacity and transits through the Harbor. While these entities may not have a current permit in place, their pending applications confirm they intend to increase their operations in the future with resultant increases in vessel traffic. The document should address potential increases in vessel traffic related to the potential increases in REG and Contanda operations, as well the proposed potash facility by BHP.	Daniel Ravenel, Environmental Protection Manager, Quinault Indian Nation	Projects that had been proposed (i.e., submitted a permit application) at the time of the Hazard Identification workshops were considered when discussing potential future vessel traffic, as described in the GH VTRA scope. Considering potential increases in vessel traffic for projects that had not submitted a permit application was outside the scope for this assessment.	No

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41	QN(L)-8			There are several references to the various uses of high intensity lights by crab/fishing vessels and the Westport Marina that appear to be suggesting eliminating or reducing these lights. We are concerned that reductions in these lighting uses could increase hazard to fishers conducting treaty reserved fishing. Another option would be to require large vessel transit only during daylight hours. This would also reduce hazards associated with the submerged hazards and the inoperable navigational aids mentioned above.	Daniel Ravenel, Environmental Protection Manager, Quinault Indian Nation	Revised recommendation to state discussion of the use of high intensity lights should include tribal and subsistence fishermen, and should consider the safety of fishermen as well as safe navigation of commercial vessels.	Yes
42	QN(L)-9			The document describes several areas of variable ship operations that increase hazards and the risks of a spill. These include anchorages in or near the channel, anchorages within four nautical miles of Grays Harbor, and variable starting points for entering the Harbor. These variable starting points could have many reasons, but one that was mentioned was the location of where the pilot boarded the ship. We recommend that the document look at some recommendations that could reduce this variability, possibly including a defined area for pilot boarding.	Daniel Ravenel, Environmental Protection Manager, Quinault Indian Nation	Added recommendation for the Grays Harbor Pilots and Port of Grays Harbor to consider coordinating with NOAA and the USCG to define a pilot boarding area.	Yes
43	QN(L)-10			Finally, we are pleased to report that QIN secured grant funding to purchase 19 handheld VHF radios for Treaty fishers in order to improve on-water communications. References to the QIN seeking grant funding to purchase VHF radios in the GHVTRA can now be removed.	Daniel Ravenel, Environmental Protection Manager, Quinault Indian Nation	Removed references to purchase of VHF radios.	Yes
44	QN-1	2		This description needs language to indicate that the other tribes mentioned are non-treaty tribes	Daniel Ravenel, Environmental Protection Manager, Quinault Indian Nation	Modified language to read: "The Quinault Indian Nation has adjudicated usual and accustomed treaty fishing areas within and adjacent to Grays Harbor and the Chehalis River."	Yes
45	QN-2	6		QIN secured grant and ordered 19 VHF radios to tribal fisherman (Area Tribes)	Daniel Ravenel, Environmental Protection Manager, Quinault Indian Nation	Removed reference to purchase of VHF radios.	Yes
46	QN-3	6		Area Tribes "This implies that there's more than just QIN fishing in the area." QIN only tribe should be QIN specific. Area tribes should be removed throughout the document.	Daniel Ravenel, Environmental Protection Manager, Quinault Indian Nation	Revised language throughout the document to clarify intent and meaning.	Yes
47	QN-4	7	Top of pg	Explore ways to increase communication between the commercial vessel community () and tribal, commercial, subsistence & recreational fishermen. (add subsistence)	Daniel Ravenel, Environmental Protection Manager, Quinault Indian Nation	Added subsistence, made change throughout report, except when discussing the Commercial Fishing, Tribal Fishing, and Recreational Vessel workshop since the title of the workshop at the time it was held did not include subsistence fishermen.	Yes

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48	QN-5	7	Safety Comm.	Including coordination with the Quinault Indian Nation government to coordinate fishing activities with shipping.	Daniel Ravenel, Environmental Protection Manager, Quinault Indian Nation	Modified language as suggested; added recommendation for potential future vessel traffic to review coordination.	Yes
49	QN-6	8		USCG sector Columbia River sec: after first bullet point about USCG attending meeting: These visits will help maintain institutional information and familiarize area of response.	Daniel Ravenel, Environmental Protection Manager, Quinault Indian Nation	Modified language as suggested.	Yes
50	QN-7	9	Surveys	Coordinate requests for surveys: need clarification if surveys are addressing equipment or conducting surveys. Need clarification (If surveys would interest QIN then QIN needs to be added.)	Daniel Ravenel, Environmental Protection Manager, Quinault Indian Nation	Modified language as suggested.	Yes
51	QN-8	9	Increasing Vessel Traffic	Needs sub-heading "Quinault Tribal Fisheries". Vessel traffic increases must respect and coordinate with Quinault Nation treaty fisheries within and outside of the Grays Harbor	Daniel Ravenel, Environmental Protection Manager, Quinault Indian Nation	The assessment focused on oil spill risks and oil spill response preparedness. Added sentence: "This risk assessment does not address potential impacts of increased vessel traffic to Quinault Indian Nation access to treaty resources, including usual and accustomed fishing areas." Added recommendation for potential future vessel traffic for Grays Harbor Safety Committee to "Review communication between the commercial vessel community (e.g., port, pilots, agents) and tribal, commercial, subsistence, and recreational fishermen, including coordination with the Quinault Indian Nation government to coordinate fishing activities with shipping; consider whether changes are required."	Yes
52	QN-9	9		Extending the Hazard Identification Process: General comment is that you should be more specific to the QIN in this document instead of using local tribes always. This comment can be carried throughout this document.	Daniel Ravenel, Environmental Protection Manager, Quinault Indian Nation	Revised language throughout the document to clarify intent and meaning.	Yes

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53	QN-10	25	Factor 19	Buoy 8 is not in place this increases navigational hazard	Daniel Ravenel, Environmental Protection Manager, Quinault Indian Nation	Per discussion with USCG Sector Columbia River and the Port of Grays Harbor, buoy 8 has been replaced with a temporary buoy.	No
54	QN-11	27	Factor 39	More clarification on surveys are they channel hydrographic, habitat, ? More clarification	Daniel Ravenel, Environmental Protection Manager, Quinault Indian Nation	Added "hydrographic" in multiple locations to clarify language.	Yes
55	QN-12	30	Existing safe guards organizations	Add QIN	Daniel Ravenel, Environmental Protection Manager, Quinault Indian Nation	Added Quinault Indian Nation to the list of organizations involved in maritime safety	Yes
56	QN-13	31	High level recommendations	Ships per week should document ships per week is 2 transits. Document should specify how many trips so in/out a vessel is conducting	Daniel Ravenel, Environmental Protection Manager, Quinault Indian Nation	Added discussion of assumptions about number of transits per vessel call.	Yes
57	QN-14	31	Aids to navigation	Bullets should include Buoy 8 is down	Daniel Ravenel, Environmental Protection Manager, Quinault Indian Nation	Per discussion with USCG Sector Columbia River and the Port of Grays Harbor, buoy 8 has been replaced with a temporary buoy.	No
58	QN-15	42	Area Tribes	Bullet 3, remove NWIFC doesn't apply to the NWIFC or QIN.	Daniel Ravenel, Environmental Protection Manager, Quinault Indian Nation	Removed reference to Northwest Indian Fisheries Commission.	Yes