

WASHINGTON STATE
BOARD OF PILOTAGE COMMISSIONERS

MEETING AGENDA

November 21, 2024

2901 3rd Avenue, Seattle, WA 98121 – 1st Floor Agate Conference Room
and

Via Teams #206.531.0324, participation code: 148712109#

[Click here to join the meeting](#)

(Public comment accepted at the discretion of the Chair and prior to the end of the meeting)

1000 hours Call to order

REGULAR MEETING

1. BPC Staff Report
2. BPC Chair Report
3. Activity Reports (5 minutes each)
 - a. U.S. Coast Guard (USCG)
 - b. Pacific Merchant Shipping Association (PMSA)
 - c. The Northwest Seaport Alliance (NWSA)
 - d. Puget Sound Pilots (PSP)
 - e. Port of Grays Harbor (PGH)

NEW BUSINESS (Public comment accepted)

4. Pilot's Report of Incident
 - a. *MILLINOCKET* 10/24/2024 PS
5. Board Action – MSOs
 - a. *TUG ATHENA (GSL CHRISTEN)* 10/04/2024 PS
 - b. *TUG ARTEMIS (WESTWOOD OLYMPIA)* 10/13/2024 PS
 - c. *NAVIOS ASTERIKS* 10/13/2024 PS
 - d. *PIER 18 CRANE (YM TIPTOP)* 10/22/2024 PS
 - e. *BAYLINER CIERA (ATB DUBLIN SEA)* 10/27/2024 PS
 - f. *FISHING NETS (NACC POROS)* 10/28/2024 PS
 - g. *FISHING NETS (GLOBAL ARC)* 10/28/2024 PS
 - h. *UNKNOWN VESSEL (MSC LUCY)* 11/03/2024 PS
 - i. *TUG SPARTAN (MONTUKEA CHIEF)* 11/04/2024 PS
 - j. *MSC SOFIA PAZ* 11/06/2024 PS
 - k. *ATB SEA RELIANCE* 11/09/2024 PS

1130 15-MINUTE BREAK

6. 1200 hours - Tug Escort Rulemaking SEPA Update Presentation
7. Board Action – October 17, 2024 Meeting Minutes
8. Board Action – Committee Recommendations:
 - a. Trainee Evaluation Committee (TEC)
 - i. Board Action – Pilot License Upgrade Program: Captain Eric Michael
 - ii. Possible Board Action – Appoint TEC Pilot Member
 - iii. Possible Board Action – Simulator Training for Captains Michelson & Wood
 - iv. Other Committee Updates

- b. Diversity, Equity, and Inclusion Committee (DEIC)
 - i. Possible Board Action – Committee Charter
 - ii. Other Committee Updates
- 9. Board Action – Pilot/Trainee Physical Examination Reports
- 10. Possible Board Action – New Board Designated Physician: D.O. Lacreasia Wheat-Hitchings (The Doctor’s Clinic)
- 11. Board Action - Proposed 2025 Board Meeting Dates
- 12. Possible Board Action – Statement of Policy Concerning Glycols, Polypropylene Tetramers, & Nonene
- 13. Possible Board Action – UTC Proposal for Puget Sound Tariff Training Surcharge Increase
- 14. Possible Board Action – Appoint Exam Committee
- 15. Possible Board Action – Cancellation of December BPC Meeting
- 16. Committee & Work Group Reports:
 - a. Pilot Safety Committee (PSC)
 - b. Vessel Exemption Committee (VEC)
 - c. Oil Transportation Safety Committee (OTSC)
 - d. Terminal Operations Work Group (TOWG)
- 17. Upcoming Regular Meeting Dates:

Thursday December 12, 2024 – Possible Cancellation	Thursday January 16, 2025 – 1000 Hybrid Options (Teams/2901 Building)
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- 18. Public Comment
- 19. Adjourn

Washington State Board of Pilotage Commissioners

Quarterly Key Performance Indicators Dashboard

12 MONTHS ENDING: Sep 30, 2024

Revised Nov 13 2024 to include pilot injury sustained Aug 22 2024 during pilot transfer (documented in both MSO report and Pilot Transfer Arrangement report).

Safety

Rest Rule Exceptions

Puget Sound District
KPI target: rate of 0.3% or less (3 or less per 1000 assigns)

2023 Q4	2024 Q1	2024 Q2	2024 Q3
0.27% ✓ 1819 assigns 5 rest exc.	0.21% ✓ 1874 assigns 4 rest exc.	0.25% ✓ 2016 assigns 5 rest exc.	0.15% ✓ 1971 assigns 3 rest exc.

This KPI counts rest rule exceptions, excluding rest rule exceptions associated with emergent situations. The most common emergent situation is a ship dragging anchor in severe weather.

Rest rules require 1) that pilots have 10 hours rest between assignments, 2) that multiple assignments (e.g. harbor shifts) not exceed 13 hours total duration.

The BPC Pilot Safety Committee reviews rest rule exceptions each quarter.

Grays Harbor District
KPI target: 1 or less per year

2023 Q4	2024 Q1	2024 Q2	2024 Q3
0 ✓ 70 assigns 0 rest exc.	0 ✓ 74 assigns 0 rest exc.	0 ✓ 76 assigns 0 rest exc.	0 ✓ 54 assigns 0 rest exc.

Unsafe Transfer Arrangements Resulting in Fall or Injury

KPI target: 0

2023 Q4	2024 Q1	2024 Q2	2024 Q3
0 ✓	0 ✓	0 ✓	1 ✗

This KPI counts occurrences where a pilot or pilot trainee falls or is injured while embarking or disembarking a vessel with noncompliant transfer arrangement, or is physically endangered regardless of whether the incident results in physical injury.

2024-08-22
CARNIVAL LUMINOSA

Pollution Incidents (Spills) with Pilot Error

KPI target: 0

2023 Q4	2024 Q1	2024 Q2	2024 Q3
0 ✓	0 ✓	0 ✓	0 ✓

This KPI counts occurrences where actual or apparent collision, allision or grounding or navigational occurrence results in environmental damage (pollution/spill), with pilot error a contributing factor.

Other Incidents (Non-Pollution) with Pilot Error

KPI target: 0

2023 Q4	2024 Q1	2024 Q2	2024 Q3
0 ✓	1 ✗	1 ✗	1 ✗

This KPI counts occurrences where actual or apparent collision, allision or grounding or navigational occurrence results in personal injury or property damage, with pilot error a contributing factor. (Pilot injury associated with noncompliant transfer arrangements reported under Unsafe Transfer Arrangements.)

2024-01-02
MATE

2024-04-16
AMERICAN FREEDOM

2024-07-23
CAPE INTREPID

Diversity, Equity, and Inclusion

DEI Committee Meetings (quarterly)

KPI target: 1 meeting per quarter or more

2023 Q4	2024 Q1	2024 Q2	2024 Q3
NONE ✗	NONE ✗	May 16 ✓ DEI Steering Committee	NONE ✗

DEI Events Attendance and/or Sponsorship (yearly)

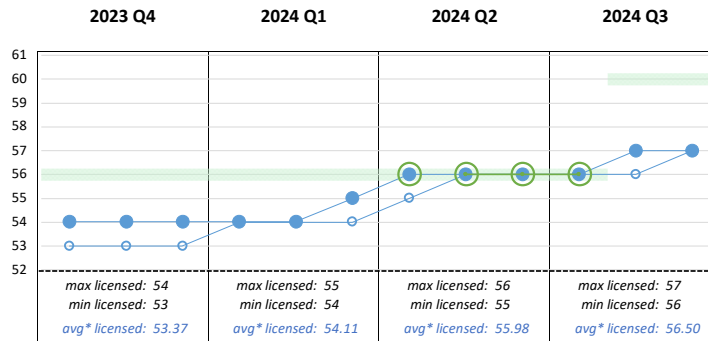
KPI target: 3 events per year or more

Year	Date	Event	Location	Atten.	Spons.
1	2023	Oct 11-13	Pride in Maritime	Online	✓
2	2023	Oct 25-27	Women Offshore Conference	Galveston TX	✓
3	2024	Feb 29-Mar 2	MARAD Women on the Water	Buzzards Bay MA	✓
4	2024	Mar 15-16	Women in Maritime Leadership	Vallejo CA	✓

Pilot Training and Licensing

Number of Licensed Pilots

Puget Sound District
KPI target: authorized number of pilots (currently 56)



*average takes into account mid month retirements & licensures – it is calculated using aggregate licensed days of all pilots

■ KPI Target = authorized number of pilots (56)
○ Minimum this month
● Maximum this month
○ KPI Target Met

Grays Harbor District
KPI target: authorized number of pilots (currently 3)



*average takes into account mid month retirements & licensures – it is calculated using aggregate licensed days of all pilots

■ KPI Target = authorized number of pilots (3)
○ Minimum this month
● Maximum this month
○ KPI Target Met



WA State Board of Pilotage Commissioners Industry Update

November 21, 2024 Meeting

Arrivals **Down 17** in Oct 2024 to Oct 2023 Comparison

✚ Containers down 1	✚ Car Carriers down 6
✚ Bulkers down 1	✚ Tankers down 2
✚ General & Other up 6	✚ ATB's down 6
✚ Cruise/Passenger down 9	✚ RoRo's up 2

Average Daily Arrivals, Assignments Compared to Number of Pilots on Watch

The October number of arrivals was 206 or an average of 6.65 arrivals per day. This was the second lowest October arrival month in 10 years with only the initial COVID year being lower. Recall, the average number of arrivals per day is just over 7 per day in the entire Puget Sound Pilotage District.

PSP monthly reports indicate an average of just over 21 assignments per day. PSP's watch schedule indicates an average of 6 more pilots scheduled for watch each day than there are assignments (includes cancelations and shifts).

PMSA 065 Positions, Statements and Documentation

Given that Maritime Forecast Breakfast and Networking, Expo, Maritime Blue and Quiet Sound annual meeting times conflict with the BPC meeting, PMSA will defer submitting documentation regarding the 065 process/statements written to better ensure PMSA positions and statements are accurately understood now and in future related discussions.

Dockworker Strikes

ILA representing U.S. dockworkers at East/Gulf coast ports reached a deal to suspend any strike action until Jan. 15 to provide time to negotiate a new contract although they have a tentative agreement on wages. Recall per our last update, that any agreement has to be approved by union members as part of the ratification of a final contract.

In Canada, the dockworkers are not working (strike/lock out depending on who you talk to). It is unclear when this will be resolved but there are calls for the Canadian Government to ensure this is short lived by taking actions to get workers back to the docks via the government jurisdiction around actions like binding arbitration (per news reports). It is unclear whether this action will result in cargo/ship diversions to Puget Sound – that will depend on how long this goes on.

ECHO and Quiet Sound Slowdowns

Both ECHO and Quiet Sound are assessing the potential of dynamic slowdowns based on when whales are present up to near/real time notification to vessels. Suffice to say, there are a number of considerations that need to be addressed and both groups are going through that process now.

U.S. Port Import Surge Fueled by Strike Concerns and Potential Tariff Increases

<https://www.globaltrademag.com/u-s-port-import-surge-fueled-by-strike-concerns-and-potential-tariff-increases/>

U.S. container imports are projected to rise through the end of the year as retailers prepare for a possible East Coast and Gulf Coast port strike and anticipated tariff hikes under President-elect Donald Trump. According to the National Retail Federation's latest Global Port Tracker report, uncertainty over labor negotiations and proposed tariffs is prompting retailers to expedite shipments and redirect cargo to West Coast ports to avoid disruptions. Amid this, President-elect Trump's proposed tariffs—up to 20% on all imports and even steeper tariffs on goods from China—are adding further pressure on importers to move goods quickly. In September, U.S. ports handled 2.29 million TEUs, a 12.8% year-over-year increase, with continued growth expected in November and December. Total TEUs for 2024 are forecasted to reach 25.3 million, a 13.6% rise over 2023. Looking into 2025, January's imports are forecast at 2.01 million TEU, up 2.5% year-over-year, with a dip expected in February due to Lunar New Year factory closures in Asia.

INTERVIEW: Shipping's climate pathway won't be derailed by next Trump presidency, industry and NGO voices concur

Written by Ariane Morrissey, Published: 07 November 2024

https://www.bunkerspot.com/global/63548-us-elections-reactions-shipping-bunkering-impact-imo-decarbonisation?utm_medium=email&utm_campaign=Bunkerspot&utm_content=Bunkerspot+CID_d504531d063949c7d9d9608284001a55&utm_source=Bunkerspot%20Noon%20Report&utm_term=INTERVIEW%20Shippings%20climate%20pathway%20wont%20be%20derailed%20by%20next%20Trump%20presidency%20industry%20and%20NGO%20voices%20concur

Reacting to the election of Donald Trump as US President, representatives of the maritime industry and environmental organisations alike are confident that his return to the White House will not thwart shipping's energy transition. 'Four years of a Trump administration is not going to derail the planet's decarbonisation efforts,' said Adrian Tolson, owner of US-based maritime consultancy 2050 Marine Energy and Vice Chair of the International Bunker Industry Association (IBIA), in an interview with *Bunkerspot*. 'There's enough commitment, frankly, from the world's major nations that, if the US takes a back seat for a few years, it just takes a back seat for a few years. It's probably indicative of the future sort of geopolitics of the world.'

COSCO Shipping Lines orders scrubber-fitted 13,600 TEU boxship sextet

November 5, 2024, by Naida Hakirevic Prevljak

<https://www.offshore-energy.biz/cosco-shipping-lines-orders-scrubber-fitted-13600-teu-boxship-sextet/>

Chinese shipping company COSCO Shipping Lines has ordered six scrubber-fitted 13,600 TEU containerships at compatriot Hudong-Zhonghua Shipbuilding.

The shipbuilding contract was signed by representatives of China Shipbuilding Trading, part of China State Shipbuilding Corporation (CSSC), Hudong-Zhonghua Shipbuilding and COSCO Shipping Lines on October 28, 2024.

Each ship will cost \$150 million and deliveries are planned for 2027, according to information provided by Intermodal. As explained, the ship type was independently developed and designed by Hudong-Zhonghua, with an overall length of 336 meters, a beam of 51 meters and a draft of 30.2 meters.

B.C. port employers launch lockout at terminals over contract dispute with foremen

Lockout began at 4:30 p.m. PT Monday

The Canadian Press · Posted: Nov 04, 2024 6:33 AM PST | Last Updated: November 4

[B.C. port employers launch lockout at terminals over contract dispute with foremen | CBC News](#)

Employers have locked out more than 700 unionized workers in the latest development in a labour dispute that the union says will shut down all ports in British Columbia until further notice. The BC Maritime Employers Association said Monday that its "difficult decision" to impose the lockout came after the International Longshore and Warehouse Union Local 514 commenced "industry-wide strike activity" at employers' terminals. The B.C. Maritime Employers Association (BCMEA) said its plan to lock out workers was meant to "facilitate a safe and orderly wind-down of operations"...

PUGET SOUND PILOTAGE DISTRICT ACTIVITY REPORT

Oct-2024

The Board of Pilotage Commissioners (BPC) requests the following information be provided to the BPC staff **no later than two working days prior to a BPC meeting** to give Commissioners ample time to review and prepare possible questions regarding the information provided.

Activity

Total pilotage assignments:	577	Cancellations:	8
Total ship moves:	569	Cont'r:	151
		Tanker:	195
		Genl/Bulk:	98
		Other:	125
Assignments delayed due to unavailable rested pilot:	5	Total delay time:	7.25 hours
Assignments delayed for efficiency reasons:	10	Total delay time:	20 hours
Billable delays by customers:	51	Total delay time:	130
Order time changes by customers:	167		
2 pilot jobs:	28	Reason:	PSP GUIDELINES FOR RESTRICTED WATERWAYS
Day of week & date of highest number of assignments:	Sunday , 10/6		28
Day of week & date of lowest number of assignments:	Thursday 10/8, Thursday 10/17		12
Total number of pilot repositions	108	Upgrade trips	16
		YTD	166
3 consecutive night assignments:	35	YTD	422

Callback Days/Comp Days

	Starting Total	Call Backs (+)	Used (-)	Burned (-)	Ending Total
Licensed	2614	52	65		2601
Unlicensed	66			17	49
Total	2680				2650

On watch assignments	523	Call back assignments	54	CBJ ratio	9.36%
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Pilots Out of Regular Dispatch Rotation (pilot not available for dispatch during "regular" rotation)

A. Training & Continuing Education Programs

Start Dt	End Dt	City	Facility	Program Description	Pilot Attendees		
4-Oct	14-Oct	Grenoble	Port Revel	Manned Model	COR(3off,7on*), KRI(6off,4on*), MCG(3off,7on*), THG(6off,4on*)		
11-Oct	21-Oct	Grenoble	Port Revel	Manned Model	MEL(10off), NIN(5off,5on*), SEA(6off,4on*)		
23-Oct	24-Oct	Seattle	PMI	BRMP	CAW(1off,1on*), COR(1off,1on*), LOB(1off,1on*), KAL(1off,1on*)		
25-Oct	31-Oct	Warsash	Solent	Manned Model	FLE(4off,3on*), KEW(7on*), MAM(2off,5on*), STU(6off,1on*)		
1-Oct	31-Oct			Upgrade Assignments On Duty	KEW*, MCN*, STA*		
1-Oct	31-Oct			Upgrade Assignments Off Duty	CAS, HOA(2off), KNU(3off), MAM(2off), MCN(2off), MOO, SCS, VEL		
					* On Watch	Off Watch	** paired to assign.
					54	68	

B. Board, Committee & Key Government Meetings (BPC, PSP, USCG, USACE, Port & similar)

Start Dt	End Dt	City	Group	Meeting Description	Pilot Attendees
1-Oct	2-Oct	Seattle	PSP	Administrative	GRK(2off)
2-Oct	2-Oct	Seattle	PSP	Administrative	MCG**

Start Dt	End Dt	City	Group	Meeting Description	Pilot Attendees		
2-Oct	2-Oct	Seattle	BPC	BPC Prep, ED intro	ANT**, BEN, KNU*		
3-Oct	3-Oct	Seattle	BPC	TEC, Orientations	BEN, KNU*		
3-Oct	19-Oct	Seattle	PSP	Administrative	KLA(9on*,7off)		
4-Oct	4-Oct	Port Angeles	PSP	Outreach	NIN**		
4-Oct	4-Oct	Seattle	PSP	Administrative-Border crossing	ANA*, CAJ, GRD, SEY		
8-Oct	8-Oct	Seattle	PSP	Outreach	NIN*, VON*		
8-Oct	8-Oct	Seattle	PSP	Administrative-Onboardin ED	GRD**		
8-Oct	8-Oct	Seattle	BPC	BPC-DEIC	BOZ*, BEN		
9-Oct	12-Oct	Galveston	PSP	Outreach	MOO(3on*)		
15-Oct	15-Oct	Seattle	PSP	Outreach	KEW		
16-Oct	16-Oct	Seattle	USCG	USCG Quarterly	COL*, HAM*, RID*		
16-Oct	16-Oct	Seattle	BPC	TEC	BEN*, KNU		
16-Oct	16-Oct	Seattle	BPC	BPC Prep	BEN*, KLA*, KNU		
17-Oct	17-Oct	Seattle	BPC	BPC	BEN*, KNU		
18-Oct	18-Oct	Seattle	BPC	BPC-Simulator	BEN*, KNU		
19-Oct	26-Oct	Seattle	PSP	APA	HAM(8off)		
19-Oct	31-Oct	Seattle	PSP	Administrative	GRK(5on*,7off)		
20-Oct	26-Oct	Seattle	PSP	APA	KLA(4on*,3off), MCG(3on*,4off), KNU(4on*,3off)		
21-Oct	26-Oct	Seattle	PSP	APA	GRD(2on*,4off)		
23-Oct	23-Oct	Seattle	BPC	VEC	CAS*		
25-Oct	25-Oct	Everett	BPC	BPC	ANT*		
28-Oct	28-Oct	Astoria	PSP	COLRIP, MOB Drills	ANA*		
29-Oct	29-Oct	Seattle	PSP	BOD	GRK, HAM, KLA, MCG*, MYE*		
29-Oct	29-Oct	Seattle	BPC	BPC	MOO, SCR		
30-Oct	30-Oct	Anacortes	PSP	Outreach	MCG**		
31-Oct	31-Oct	Seattle	BPC	PSC PREP	ANA**, SCR*		
					* On Watch	Off Watch	** paired to assign.
					49	56	6

Safety/Regulatory

Outreach

Administrative

C. Other (i.e. injury, not-fit-for-duty status, COVID risk)

Start Dt	End Dt	REASON	PILOT

Trailing 12 months revenue assignments
7,599
Call back job ratio during the last 12 months (Nov 2023-Oct 2024) 12.42%

Puget Sound District Activity Report Dashboard

2024 October

Last modified
11/19/2024

Licensed Pilots
Including President

57

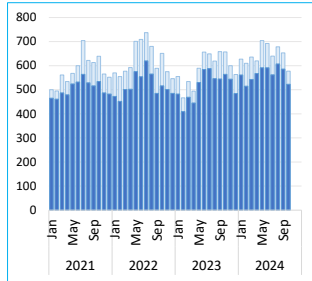
No changes in October.

PS District
Trainees

7

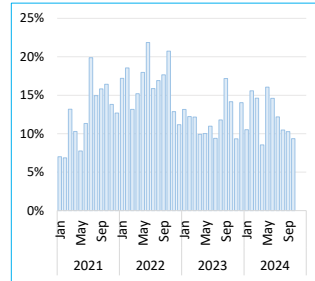
6 on stipend, and 1 off stipend
(3 new trainees started in October)

Monthly Total
Assignment Count
577

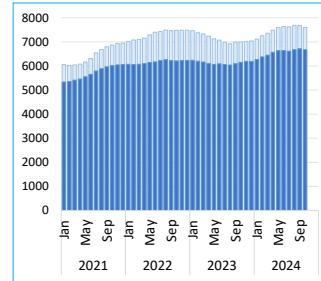


523 On-Watch (dk blue), 54 Off-Watch (lt blue)

Monthly Off-Watch
Assignment Percentage
9.4%

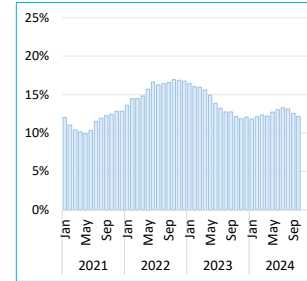


Trailing 12 Total
Assignment Count
7599



6674 On-Watch (dk blue), 925 Off-Watch (lt blue)

Trailing 12 Off-Watch
Assignment Percentage
12.2%



Licensed Pilots w/o Pres **56**
Pilots NFFD whole month **0**
Available Pilots **56**

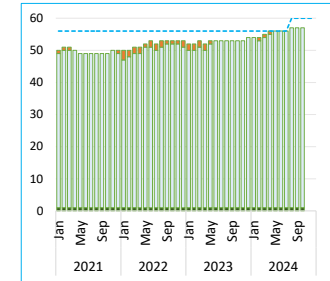
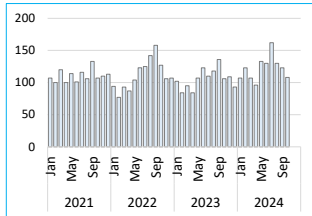
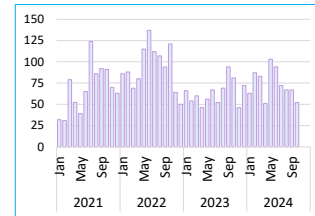


chart also includes president (1 pilot)

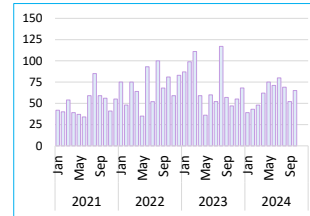
Repositions
108



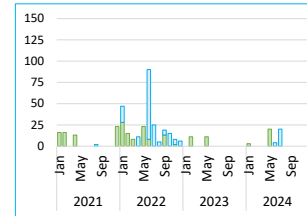
Comp Days Earned
(Callbacks)
52



Comp Days Used
(Licensed Pilots)
65

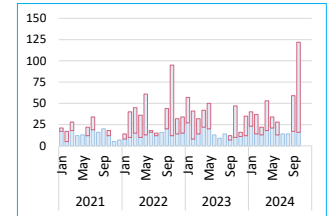


COVID Days* **0**
NFFD Days* **0**



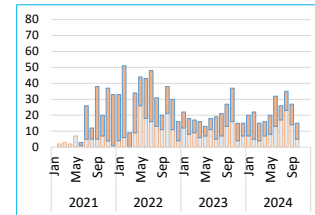
count of NFFD & Covid days if
pilot(s) not NFFD whole month

Training Days **106**
Upgrade Trips **16**



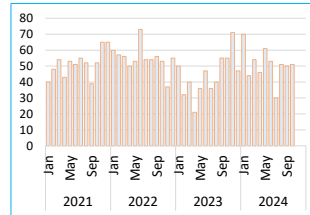
training days (red) stacked
on upgrade trips (blue)

Pilot Delays (Count)
combined total
15

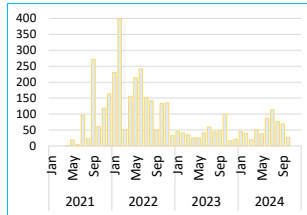


efficiency delay counts stacked on top
of pilot shortage delay counts on bottom

Billable Delays (Count)
by Customers
51

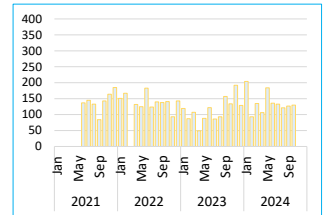


Pilot Delay Hours
(Pilot Shortage & Efficiency)
27.25 hrs



total pilot delay hours (not separated into
efficiency & pilot shortage components)

Billable Delay Hours
by Customers
130 hrs



Port of Grays Harbor

Pilotage Report

November 21, 2024

Pilotage Activity

There were a total of 8 arrivals in October (6 dry bulkers, liquid bulkers and 1 RoRo) for a total of 22 jobs. Year to date, through October, there have been 86 arrivals for a total of 226 jobs.

The November schedule is really full with 10 arrivals scheduled so far: 1 liquid bulker, 3 RoRo's, 1 logger and 5 dry bulkers.

Terminal 4 Expansion

The Port opened bids on phase 1 of the Terminal 4 Expansion October 25, 2024. Roglin's Inc., of Aberdeen, was the low bidder at \$43 million. We will be advertising the second, smaller phase, in early December. We held a very successful bond sale on Tuesday, November 12, 2024 where the Port issued a combination of \$26 million in GO and Revenue Bonds also taking advantage of new Tax Increment (TIF) legislation. This bond sale will complete the major portion our funding package for the package along with a \$25.5 million PIDP grant from MARAD. We are still planning a groundbreaking for the project on November 26, 2024.



Tug Escort Rulemaking Update to the Board of Pilotage Commissioners

November 21, 2024





Meeting Objectives

- ✓ Share updates on technical analyses for priority elements of the EIS
- ✓ Help you prepare for February Workshop Series

Agenda



1. Brief rulemaking overview
2. Preliminary technical findings for priority elements of the EIS
3. Questions and Discussion
4. Discussion on FORs
5. Review of timeline and upcoming milestones

Rulemaking Overview (ESHB 1578)

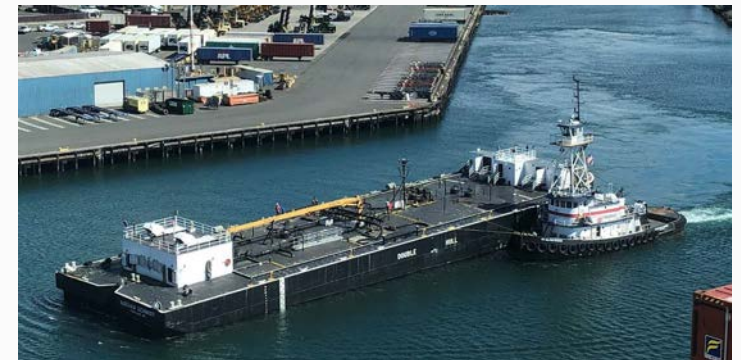
- **Vessel Types:** The BPC, in consultation with Ecology, must adopt tug escorts rules for the following vessels:
 - Small (5,000 – 40,000 dwt) oil tankers
 - ATBs, and towed barges greater than 5,000 dwt designed to transport oil in bulk internal to the hull



Tanker

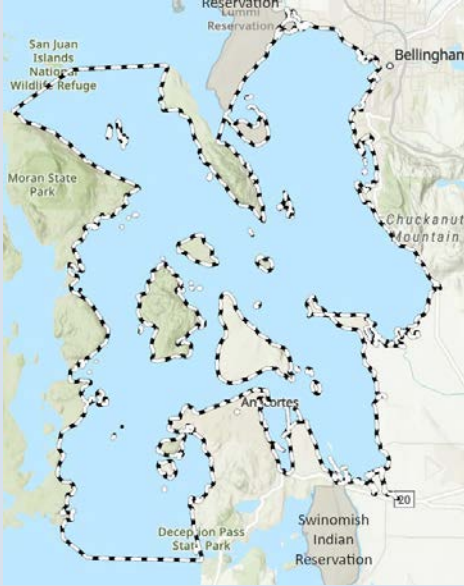
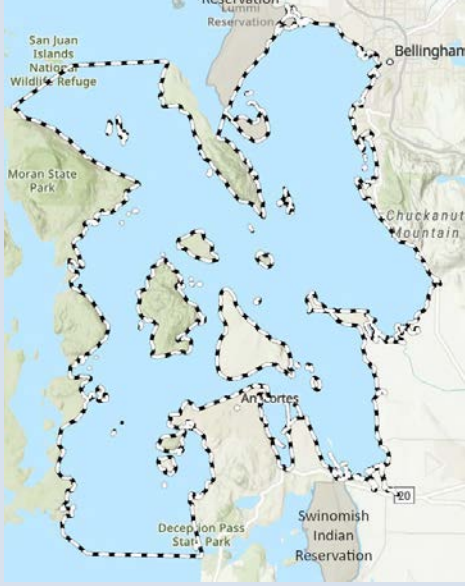

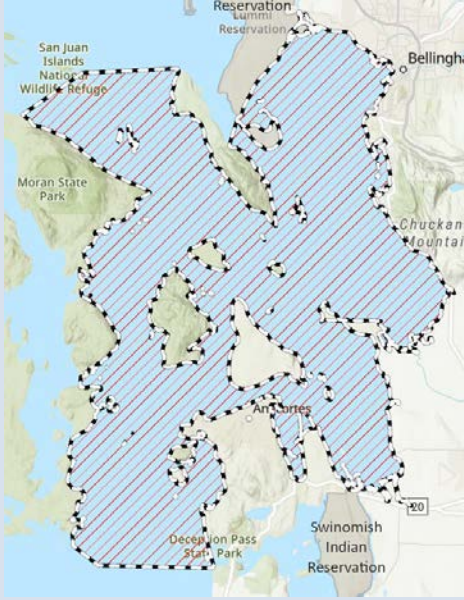


ATB



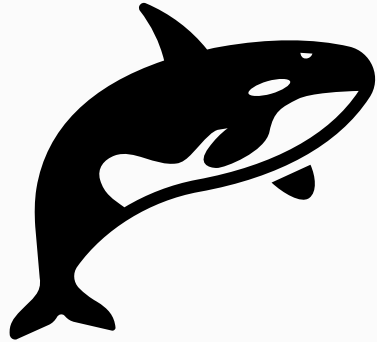
Tank Barge

Reminder: Current Proposed Alternatives

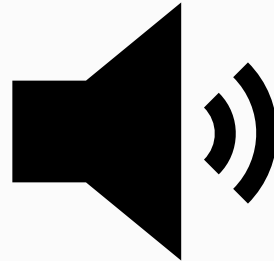
	Alt. A: No Action	Alt. B: Addition of FOR Only	Alt. C: Expansion	Alt. D: Removal
Geography	No change from 2020 	No change from 2020 	Keep 2020 + expand to SoG/SoG S. 	Remove reqs. w/in 2020 boundary 
Functional and Operational Requirements (FOR)?	No change from 2020.	ADD pre-escort conference, minimum horsepower, propulsion specifications	ADD pre-escort conference, minimum horsepower, propulsion specifications	No requirements for target vessels



Reminder: Priority Elements



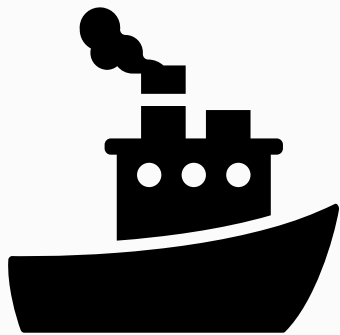
Plants and Animals



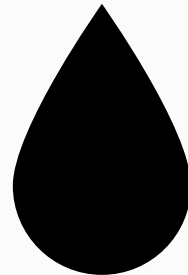
Underwater Noise (Noise)



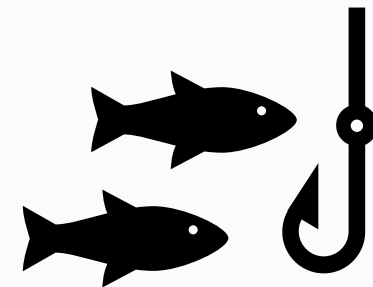
Air Quality



Vessel Traffic



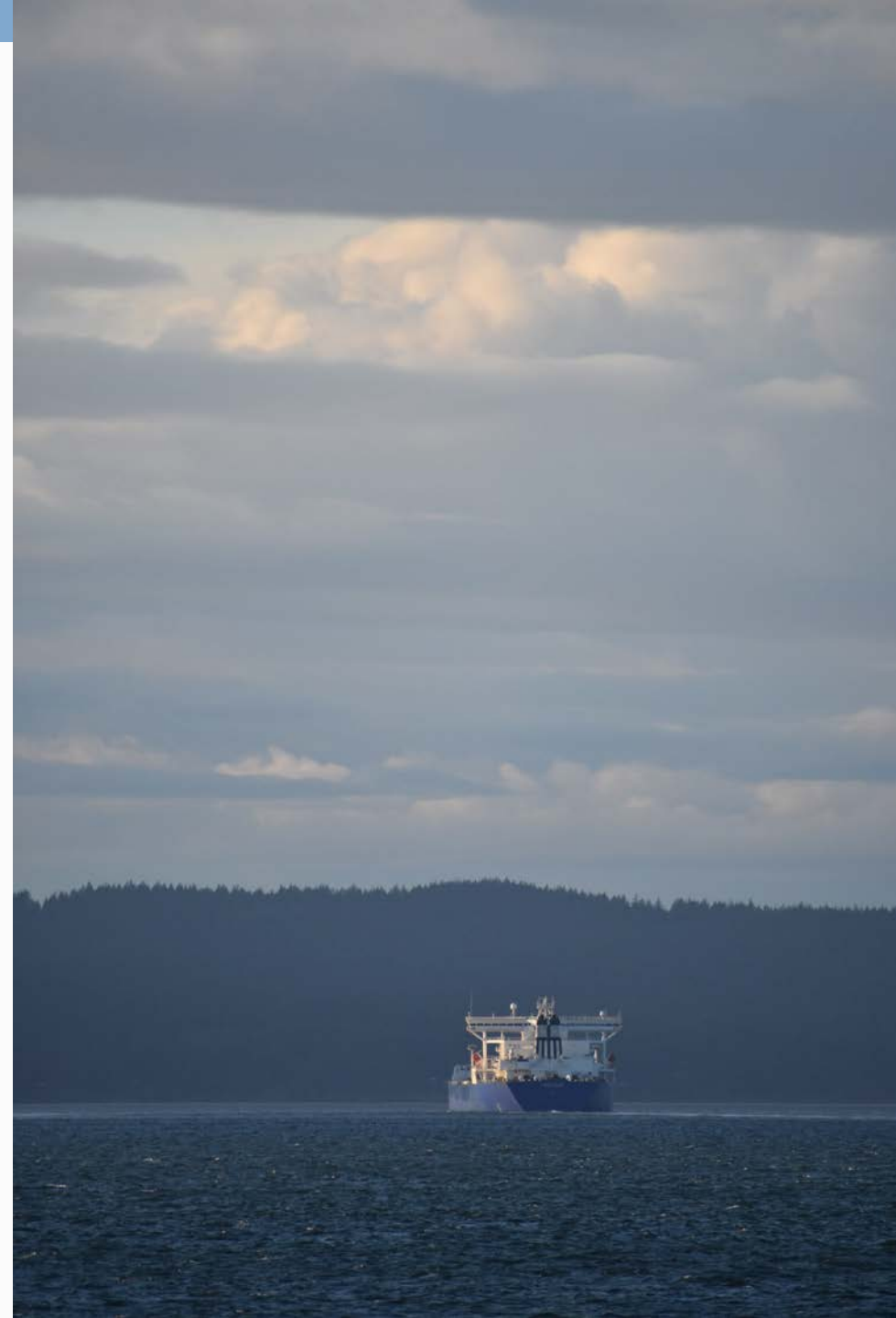
Oil Pollution



Tribal Resources

Vessel Traffic: Methods Reminder

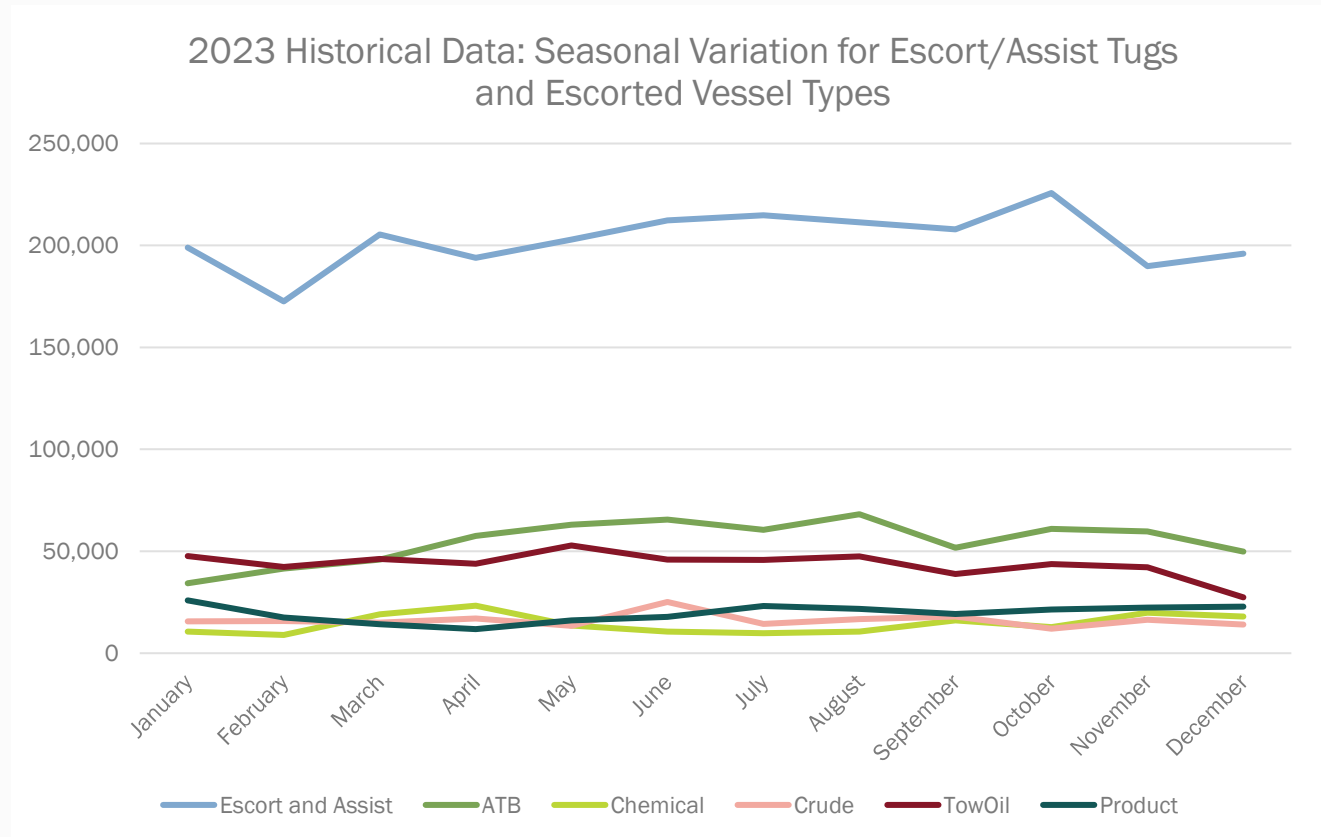
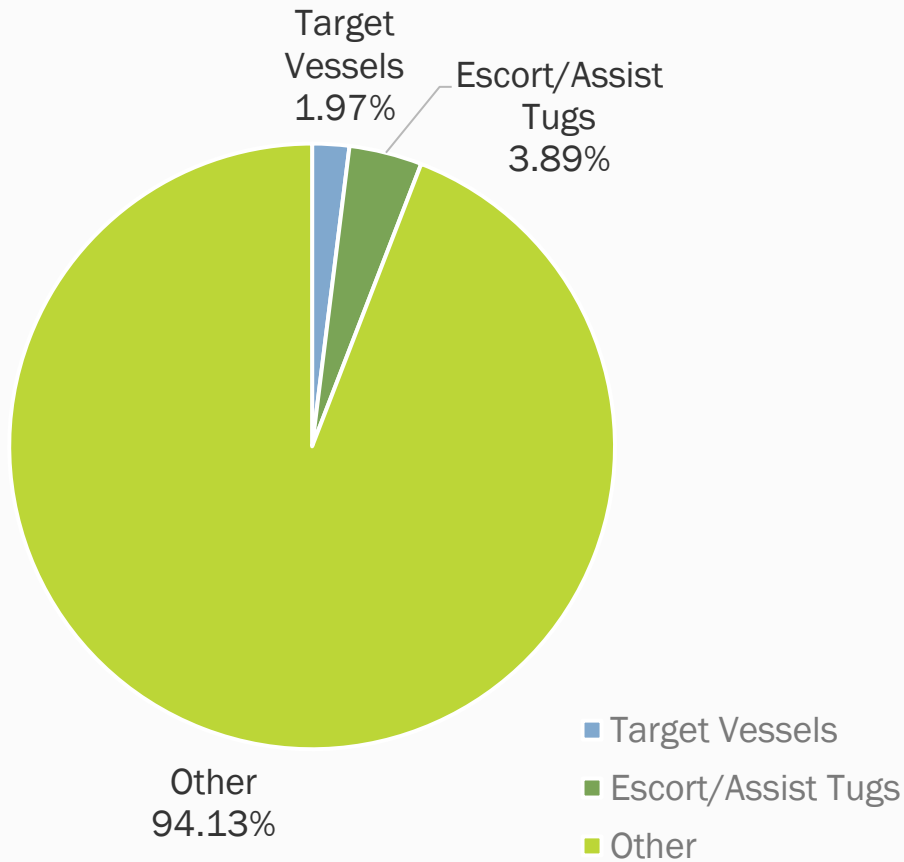
- Develop a quantitative baseline:
 - Existing traffic for target vessels
 - # of escort jobs/year
 - Underway minutes/year for escort tugs
- Model changes in underway time for each alternative, develop heat maps
- Assess areas of potential impact
- Identify mitigation



Historical AIS – Target Vessels, Escort/Assist Tugs

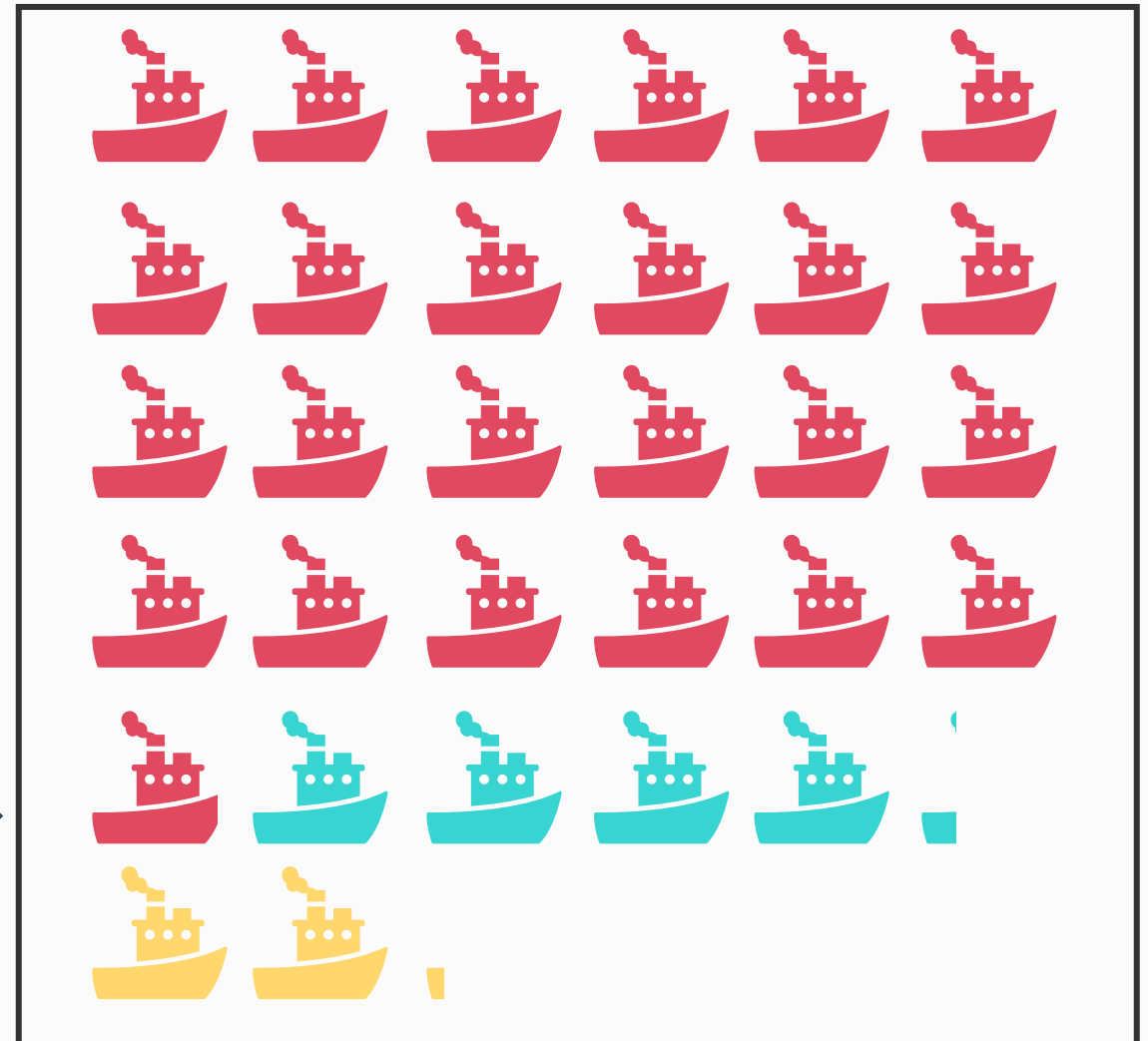


Historical AIS (2023): Escort/Assist Tugs and Target Vessels



Vessel Traffic: Number of Escort & Assist Jobs

	Number of Escort Jobs (Target Vessels)	Number of Escort Jobs (Non-Target)	Number of Assist Jobs
Per Year	1,537 jobs	785 jobs	9,099 jobs
Per Day	4.21	2.1	24.93



One Day of Escort/Assist Tug "Jobs" →



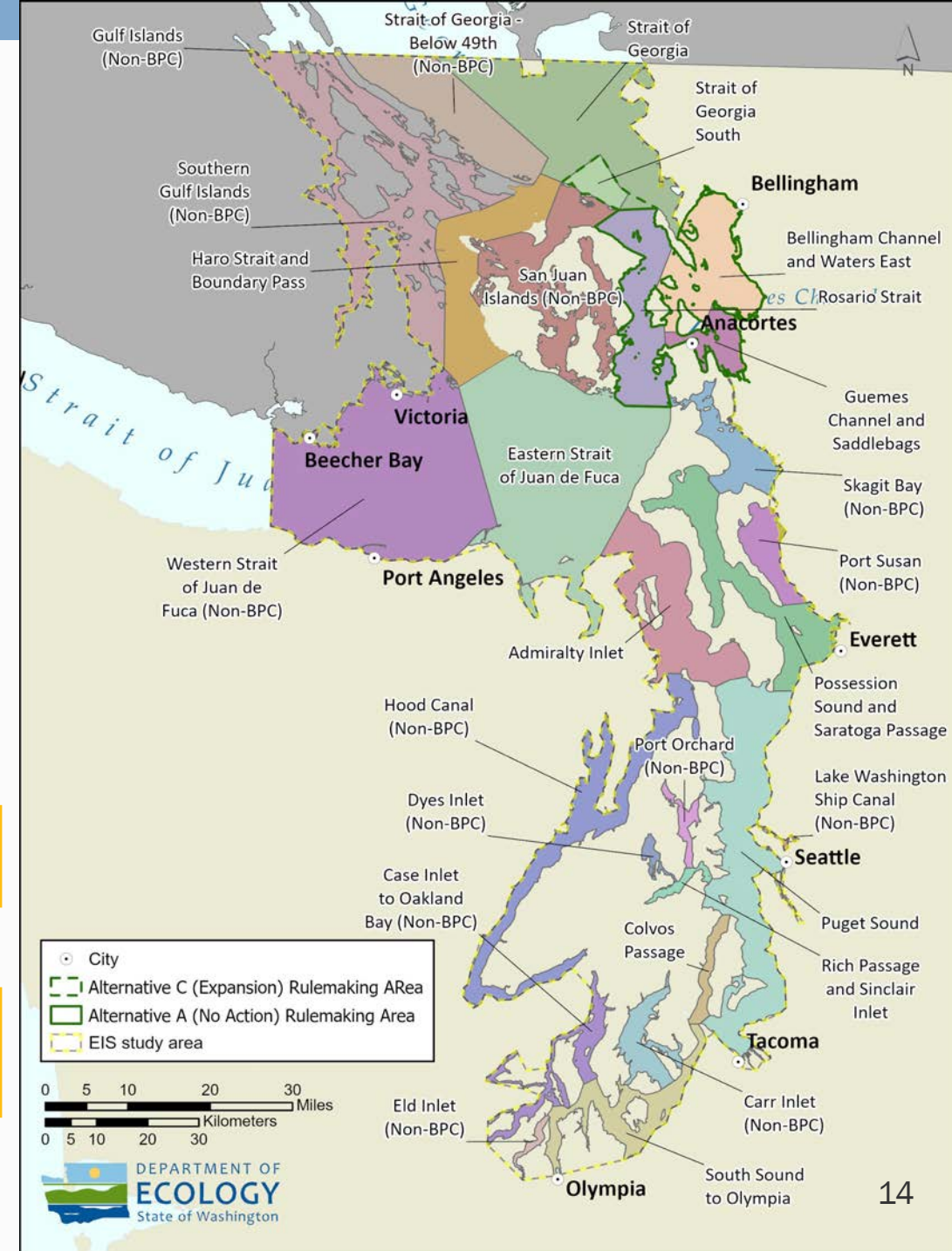
Vessel Traffic: Escort Tug Underway Time

Alternative	Total Annual Underway Minutes	Estimated Hours/Day of underway time
No Action	610,107	27.86
Addition of FORs	610,107	27.86
Expansion	624,784	28.53
Removal	0	0



Underway Time by Zone

Zone	No Action: Underway Hours/Day	Expansion: Underway Hours/Day	Removal: Underway Hours/Day
Rosario Strait	9.38	9.13	0
Guemes Channel and Saddlebags	4.81	4.65	0
Bellingham Channel	3.46	3.09	0
Puget Sound	3.08	3.07	0
Eastern Strait of Juan de Fuca	1.94	1.94	0
Strait of Georgia	1.88	2.24	0
San Juan Islands (Non-BPC)	0.02	0.01	0
Strait of Georgia South	0.02	1.11	0
All Zones	27.86	28.53	0



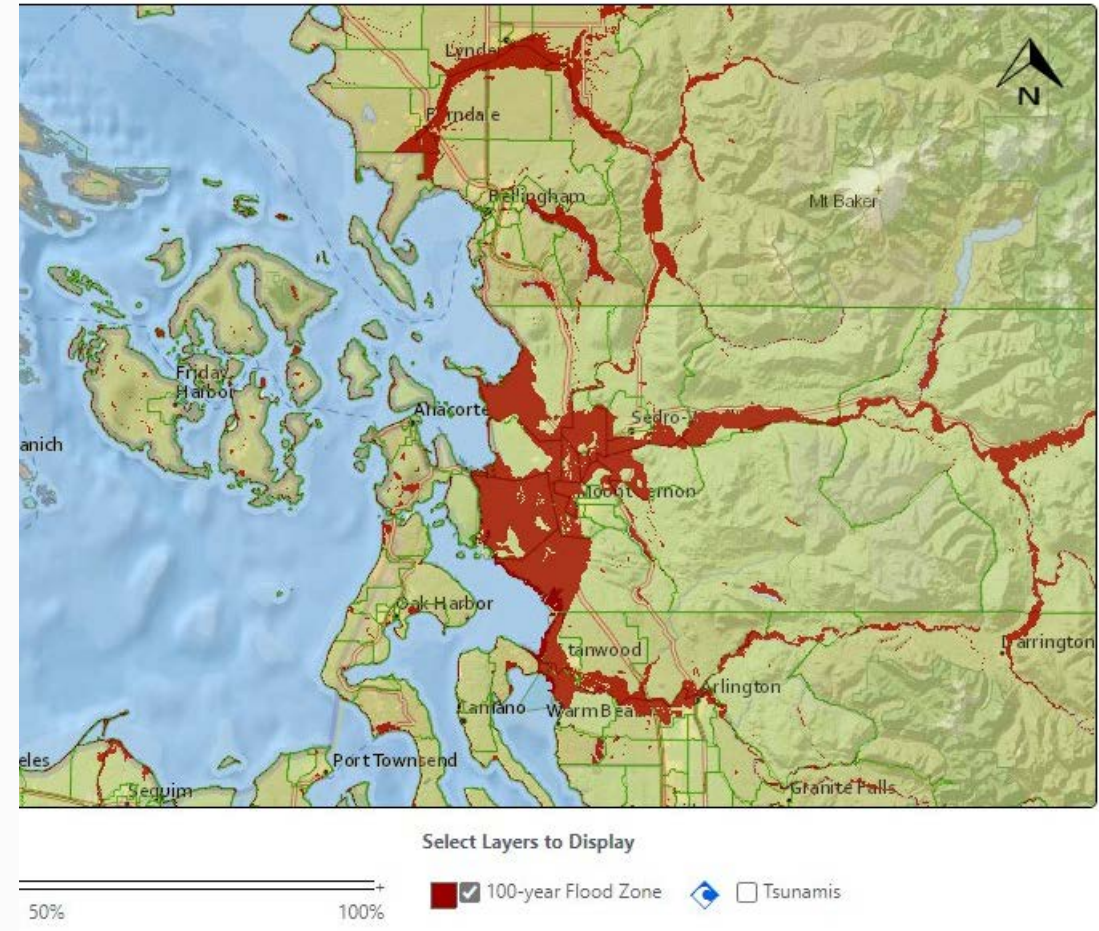
Oil Pollution: Methods Reminder

- Establish baseline
 - Target Vessels: Drift grounding frequency
 - Escort Tugs: Hazard incident frequency
- Assess changes in incident frequency and distribution of impacts for each alternative
- Describe impacts
- Identify mitigation



Recurrence Intervals

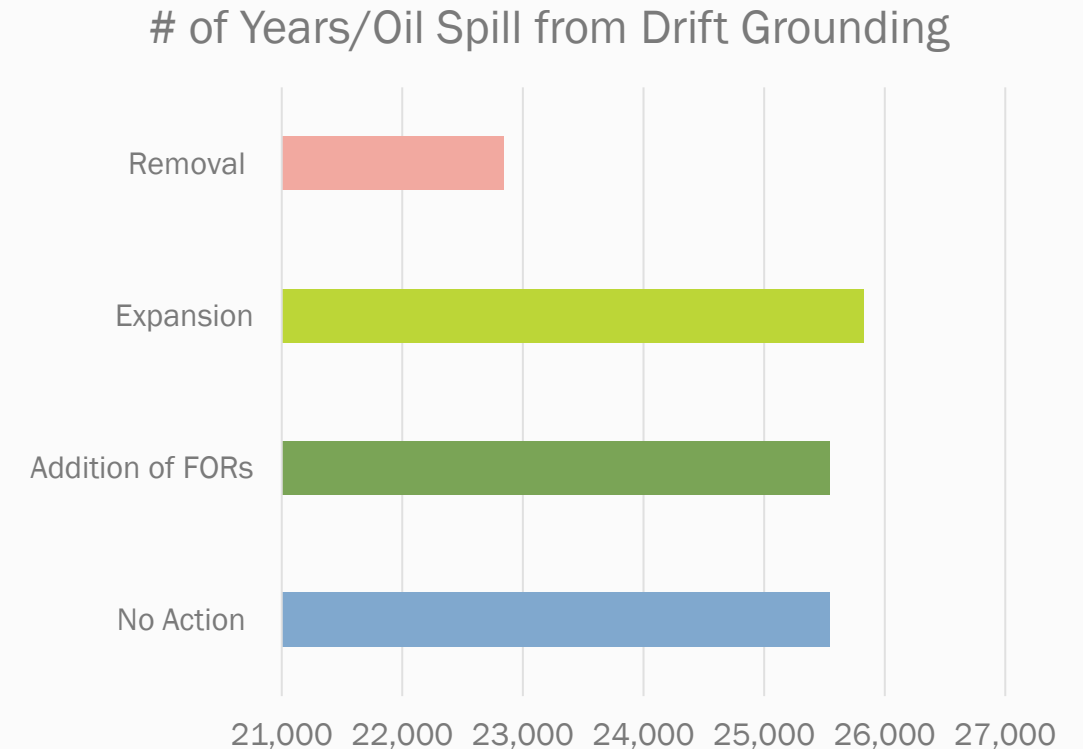
- Example: 100-Year Floods
 - Measure of Probability: A flood of that magnitude has a 1% chance of occurring in any given year.
- Does NOT mean that a 100-year event can't happen in Year 1 and Year 2 or even twice within a single year.
- NOT Predictive



Washington Tracking Network, Washington Department of Health. Web. "Area in 100-year Flood Zone". Data was obtained from the Federal Emergency Management Agency. Published: September 2021.

Target Vessels: Drift Grounding Probability in EIS Study Area

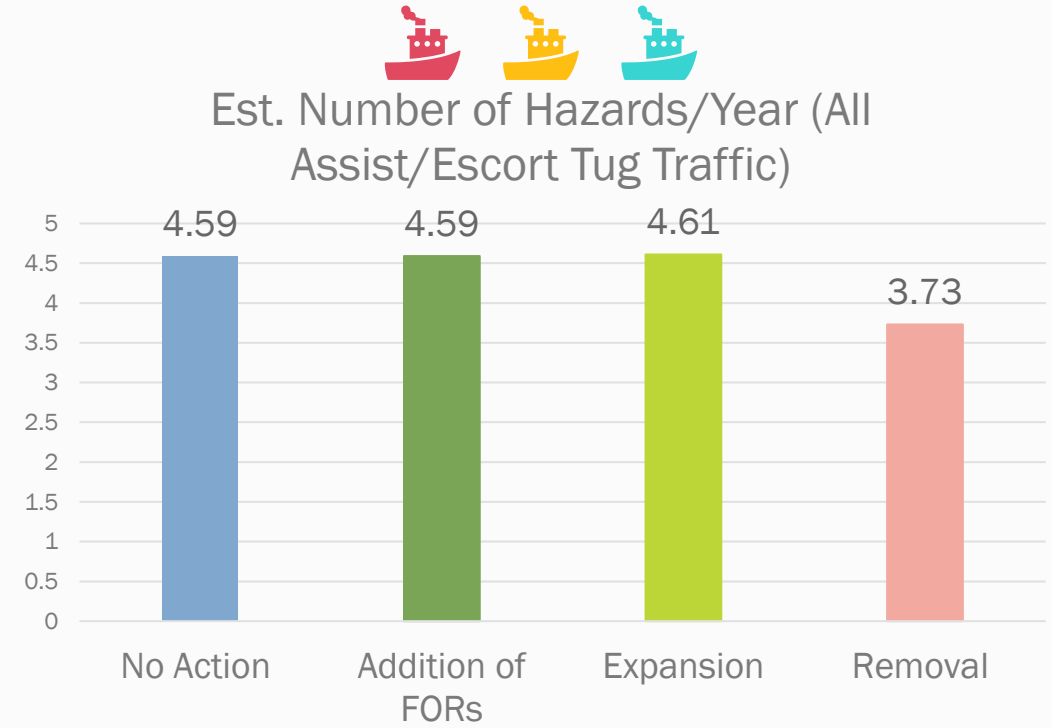
	# of Years/ Loss of Propulsion	# of Years/Drift Grounding	# of Years/ Oil Spill from Drift Grounding
No Action	5	186	25,546
Addition of FORs	5	186	25,546
Expansion	5	189	25,830
Removal	5	167	22,841



Escort/Assist Tugs: Hazard Probability in EIS Study Area



Alternative	Est. Number of Hazards/Year (Escort of Target Vessels Only)	Est. Number of Hazards/Year (All Assist/Escort Tug Traffic)
No Action	0.86/year	4.59/year
Addition of FORs	0.86/year	4.59/year
Expansion	0.88/year	4.61/year
Removal	0/year	3.73/year



- Allisions/Collisions are highest single incident category type
- Less than one tug incident/year associated with the rule
- Between 3-4 total assist/escort tug incidents unrelated to the rule

Incident Data (2017-2023) within EIS Study Area

Vessel Type	Number of Incidents (Oil Pollution, Vessel Casualty) Identified	Total Oil that Reached the Water (all incidents)	Incidents that Occurred While Vessel was Underway	Number of Incidents Where an Escort Tug May Have Helped (all incidents)
Tankers	31	1.41 gallons	12	4
Tank Barges	16	19.66 gallons	4	4
ATBs	5	27.01 gallons	1	1
Assist/Escort Tugs	5	5.26 gallons	3	N/A

**As requested in the Stakeholder Workshop, we are including information about the number of incidents that occurred while the vessel was underway.*

Air Quality Methods: Reminder

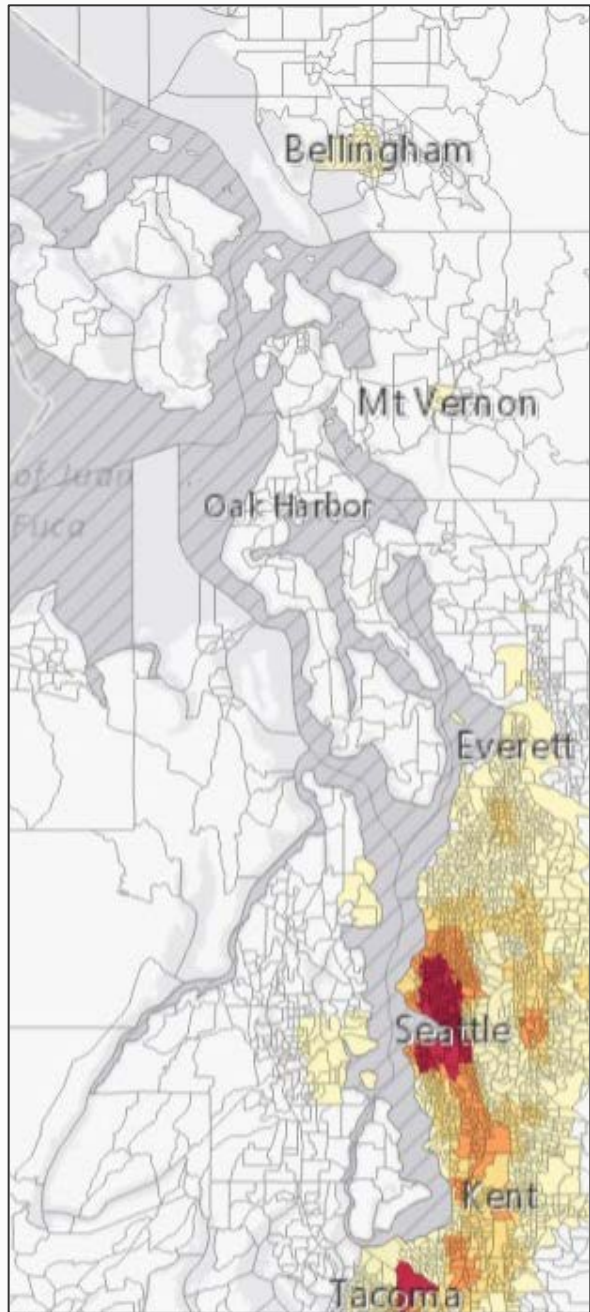
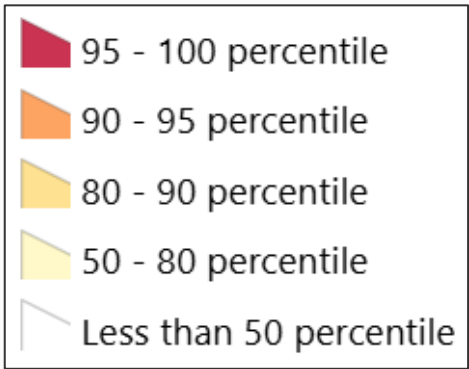
- Develop a baseline:
 - Describe existing air quality (AQ) conditions
 - Quantify existing emissions from target vessel tug escorts
 - Use dispersion model to assess whether these emissions contribute to AQ concerns in selected “receptor areas”
- Quantify changes in emissions for each alternative
- Use dispersion model to assess new or avoided AQ concerns in receptor areas
- Identify mitigation



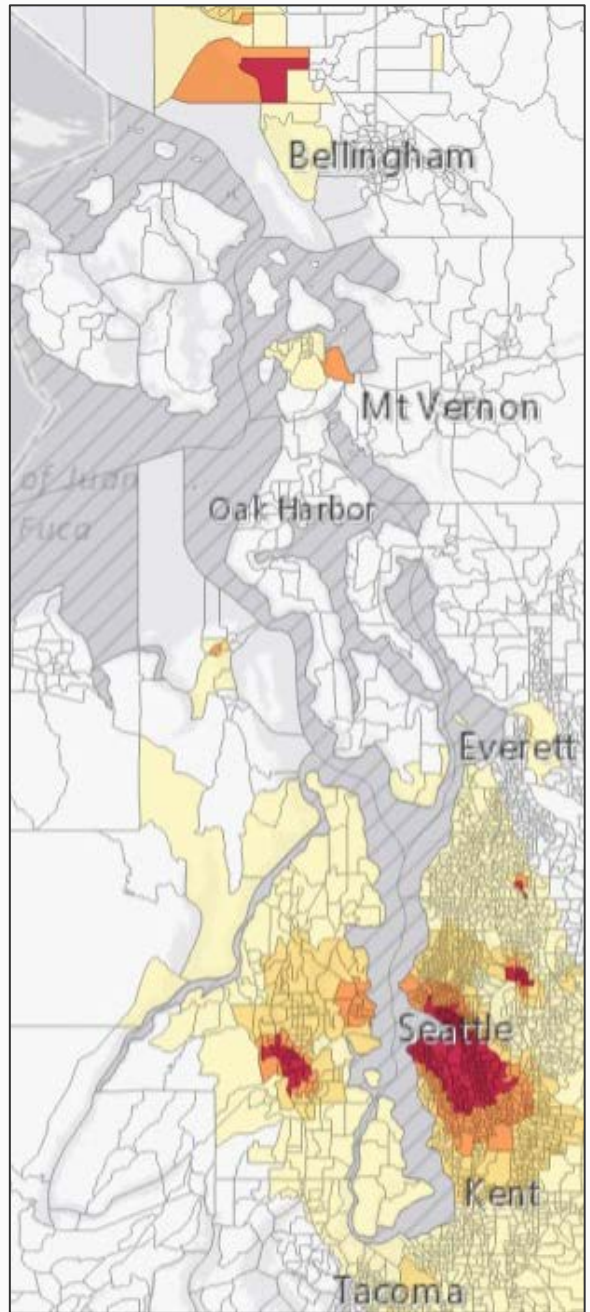


Baseline Air Quality and Escort Tug Emissions

- Entire EIS Study Area is “attainment” status for criteria pollutants
 - Exception: Portion of Whatcom County
- However – certain communities may currently experience disproportionate AQ-related health impacts
 - Urban areas (e.g., Seattle, Tacoma) have relatively high pollution (e.g., diesel particulate matter)
 - Increased risk of respiratory and cardiovascular conditions (e.g., asthma, heart disease)



Diesel Particulate Matter





Toxic Releases to Air



Current Asthma




Baseline Air Quality and Escort Tug Emissions

- Nitrogen oxides (NO_x) is by far the highest criteria pollutant.
- Results of dispersion modeling ( emissions only):
 - **Annual average:** Concentrations are below **screening thresholds** at all receptor areas and for all modeled pollutants
 - **Peak days:** NO_x at all 8 receptor areas does occasionally exceed the conservative **screening threshold** – however:
 - Per monitoring data, actual NO_x levels in region are low (below **federal air quality standards**)
 - “Peak day” contributions from  do not cause AQ problems
 - **Air toxics:** Ongoing



Changes Under the Alternatives

- **Alternative A (No Action):** No change in emissions
- **Alternative B (Addition of FORs):** No change in emissions
- **Alternative C (Expansion):**
 - Annual emissions: 3-4% increase, concentrated in and around expanded rulemaking boundary
 - Annual average concentrations: Remain below **screening thresholds**
 - Slight increase in some receptor areas (Cherry Point, Eastsound/Buckhorn area)
 - Peak day concentrations: Very similar to baseline
- **Alternative D (Removal):** Elimination of  emissions

Tribal Resources Methods: Reminder

- Conduct outreach to potentially affected Tribes (e.g., workshops, one-on-one meetings, site visits)
- Identify and review data from available references and source material to analyze existing Tribal resources of interest within EIS Study Area
- Describe impacts and compare across alternatives
 - Focus: impacts to tribal treaty fishing rights, culturally significant species
- Determine significance, identify mitigation





Current Threats to Tribal Resources

- Existing levels of vessel traffic in shipping lane and at anchorage take physical space from U&A fishing
- Interference with access to fishing areas
- Fishing gear loss resulting in a large financial burden to Tribal fishers (paired with physical safety concerns)
- Wake impacts to fishing areas
- Oil pollution
- Climate change impacts (i.e., sea level rise, storm surges, ocean acidification, invasives) that affect habitat and water quality

Summary of Impacts

Existing conditions:

Change relative to existing conditions:

Threat	Impact from tug escorts
Vessel Traffic/Congestion	☒ ☒
Strike Risks to Culturally Sig. Species	☒
Water Quality Impacts from Target Vessel Oil Spill Risks	--
Water Quality Impacts from Escort Tug Fuel Spill Risks	☒
Physical Disturbance to Coastal Tribal Resources (from Oil Spill Risk)	--

Alt. A No Action	Alt. B Add'n of FORs	Alt. C Expansion	Alt. D Removal
--	--	↑	↓ ↓
--	--	--	↓
--	--	↓	↑
--	--	↑	↓
--	--	↓	↑

Plants and Animals Methods: Reminder

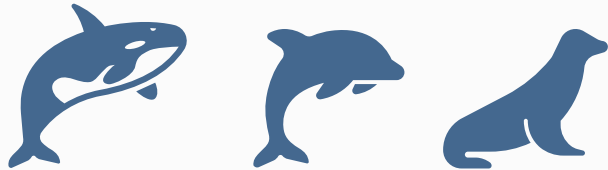
- Develop a baseline:
 - Broadly describe existing plant and animal resources
 - Identify existing threats to plant and animal resources
- Estimate contributions of existing escort tug activity to threats
- Estimate changes in threats for each alternative
- Identify significant impacts and mitigation





Resources within the EIS Study Area

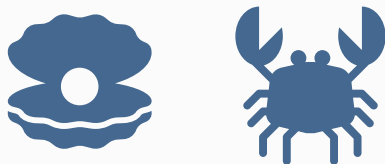
- **Marine Mammals**



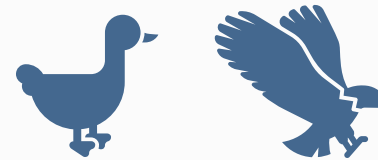
- **Finfish**



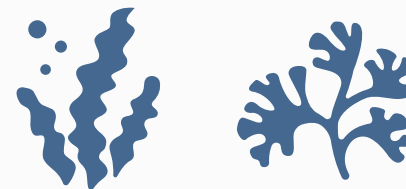
- **Aquatic Invertebrates**



- **Birds**



- **Intertidal and Aquatic Plants**



- **Protected Ecological Areas & Special Aquatic Habitats**





Current Vessel-Related Threats

Known Threats

- Underwater noise
- Vessel strikes
- Physical disturbance from vessel interaction (esp. SRKW)
- Disturbances to habitat from wakes and anchoring
- Disturbances from artificial lighting
- Oil spill risks and impacts (spill and clean-up)

Potential Threats

- Pollutants in vessel wastewater discharges
- Exposure to vessel exhaust
- Disturbance from anchoring, entanglement



Summary of Impacts

Existing conditions:

Change relative to existing conditions:

Threat	Impact from tug escorts
Underwater Noise	ongoing
Strike Risks	☒☒
Physical Vessel Interaction	ongoing
Wastewater	☒
Habitat Disturbance	☒
Air Emissions	☒
Artificial Light	☒
Target Vessel Oil Spill Risks	☒
Escort Tug Fuel Spill Risks	☒

Alt. A No Action	Alt. B Add'n of FORs	Alt. C Expansion	Alt. D Removal
--	--	ongoing	ongoing
--	--	--	↓↓
--	--	ongoing	ongoing
--	--	--	↓
--	--	--	↓
--	--	--	↓
--	--	↓	↑
--	--	↑	↓

Key: (-) = None/beneficial; (☒) = Impact; (☒☒) = Greater impact

Key: (-) = No meaningful change; (↑ or ↓) = Change; (↑↑ or ↓↓) = Greater change

Underwater Noise Methods: Reminder

- Conduct modeling to assess whether underwater noise from vessel activity (with and without tug escorts) exceeds acoustic thresholds of concern for marine mammals
- “Deep Dive” underwater noise workshop held Nov. 7th





Preview of Underwater Noise Results

Alternative	Preliminary Findings
Alt. A: No Action	<ul style="list-style-type: none">• Noise levels occasionally exceed threshold in 6 of 7 locations• More frequent near congested ports and shipping lanes• Noisiest location exceeded threshold 4% of the time
Alt. B: Addition of FORs	No Change from Alternative A
Alt. C: Expansion	<ul style="list-style-type: none">• Noise levels increase at certain locations and times• No change in time exceeding the 120 dB threshold over Alternative A
Alt. D: Removal	<ul style="list-style-type: none">• Noise levels decrease at certain times and locations• Noisiest location exceeded threshold 2.6% of the time



OTSC Updates & Discussion

- **Least-Burdensome Alternatives** ([RCW 34.05.330](#))

Before we can adopt a rule, we must determine that the requirements of the rule are the least burdensome set of requirements that achieve the goals and objectives of the authorizing statute.

- **Best Achievable Protection** ([RCW 88.46.010](#))

- The additional protection provided by the measures;
- The technological achievability of the measures; and
- The cost of the measures.

Upcoming Milestone Review

Milestone	TENTATIVE Timeline	Input Opportunity
Technical Analyses	July – Dec. 2024	Submit informal comments, 1-1 meetings
Workshop Series #10 + Technical Deep Dive Workshop: Noise	Nov. 2024	Comments, updates on underwater noise methods and analysis, early review of other technical analyses for priority elements.
Workshop Series #11	Feb. 2025	Comments on proposed rule language, preliminary econ update
Early Review Sections of Completed Technical Analyses	Late spring/early summer 2024	Possible early review for OTSC and Tribes
DEIS Drafting	Nov. 2024 – Summer 2025	Comments, feedback at workshops, 1-1 meetings
Rule Language Development	Ongoing through Summer 2025	Comments, feedback at workshops, 1-1 meetings
Economic Analysis	Ongoing through Summer 2025	Informal update at Feb. Workshop, PRA published with CR-102, 1-1 meetings, comments and feedback
CR-102/DEIS Comment Period	Summer 2025	Formal comments, public hearings

OTSC and BPC Meeting Timeline

Date (2025)	What	Objective
January 9	OTSC Meeting	Update on rule development
February 13	OTSC Meeting	Workshop 11: Recommend proposed rule
February 20	BPC Meeting	Update on rule development
March 6 (tentative)	OTSC Meeting	Tentative: Recommend proposed rule
March 20	BPC Meeting	Vote on proposed rule
June 5	BPC Meeting	BPC briefing before CR-102 filing





Final Questions or Discussion?

BPC Point of Contact:

Jaimie Bever, Executive Director

BeverJ@wsdot.wa.gov or (206) 305-2296

SEPA Point of Contact:

Haley Kennard, Tug Escort

Environmental Analysis Coordinator

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





STATE OF WASHINGTON
BOARD OF PILOTAGE COMMISSIONERS

2901 Third Avenue, Suite 500 | Seattle, Washington 98121 | (206) 515-3904 | www.pilotage.wa.gov

DIVERSITY, EQUITY, & INCLUSION COMMITTEE (DEIC) CHARTER

I. Introduction

The BPC's top priority is safe pilotage in Washington State. In addition to a highly specialized and effective training program, strict rest requirements, focus on safe pilot transfer, and other safety-first initiatives on and off the water, the BPC believes that safety stems from trust and engagement. A culture of belonging is essential to embracing diversity, equity, and inclusion as well as fostering trust and engagement. The BPC strives for every pilot, pilot trainee, applicant, aspirant, and employee to see Washington state pilotage as a place they belong and in which they are reflected.

II. Purpose

The purpose of the Board of Pilotage Commissioners' (Board or BPC) Diversity, Equity, and Inclusion Committee (DEIC) is to: work toward establishing a pilot corps that reflects the people of Washington State by increasing the diversity of state licensed pilots and creating a culture of belonging where all perspectives are valued and welcomed.

III. Membership

The DEIC shall consist of:

- one (1) Chair who is a BPC member or BPC staff;
- up to (3) members of the BPC; and
- at least one (1) representative who is a pilot member of Puget Sound Pilots
- up to two (2) active pilots from the Puget Sound, or Grays Harbor Pilotage Districts.

The DEIC members shall be appointed by the Board for an initial term of one (1) year and will be appointed/reappointed by the Board annually. The Committee may consult with additional subject matter experts as needed.

IV. The Role of Chair

The Chair of the DEIC will work with BPC staff to prepare meeting materials and will oversee the meetings. The Chair will also provide monthly updates to the Board on committee

activities, coordinate and communicate with committee members and outside interests, and deliver recommendations to the Board on behalf of the Committee.

V. Authority

The DEIC is an advisory committee to the Board only. It will not make policy decisions. Committee recommendations will be agreed upon by majority rule.

VI. Guidelines & Responsibilities:

Committee members will commit to the following:

- Meetings will start and end on time;
- Regularly attend meetings and provide an alternate if unable to attend a meeting;
- Come prepared to meetings having reviewed meeting materials and be productive at each meeting;
- Be open to new ideas and ways of doing things;
- Everyone's contributions are valued, be respectful and support each other's role; and
- Provide, via vote, recommendations to the Board.

VII. 2025 Scope of Work:

- Develop and implement initiatives that resonate with BPC vision, mission, and values;
- Increase diversity in the 2026 Exam applicant pool;
- Explore and consider assessments for physical, environmental, and psychological safety;
- Ramp up outreach and social media presence to reach diverse mariners;
- Request pilotage tariff funding for hiring a diversity consultant to assist with outreach, messaging, and data gathering;
- Work to establish a culture of Belonging in Washington state pilotage with assistance of Puget Sound Pilots and the Port of Grays Harbor; and
- Prepare Diversity Action Plan for 2024 Annual Report.

VIII. Meetings/Time Commitment

Meetings will occur at least quarterly, as needed, and will typically last 1-2 hours. Locations may vary. However, a virtual option will be made available.

Meeting summaries/notes will be reviewed by the Committee and provided to the Board.

The DEIC will review its charter at least annually and recommend any proposed changes to the Board for review and adoption.

This charter was adopted by the Board of Pilotage Commissioners on _____, 2024.



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PROPOSED BOARD MEETINGS

2025 MEETING SCHEDULE

3rd Thursdays at 1000 except June & December

January	16
February	20
March	20
April	17
May	15
June	26
July	17
August	21
September	18
October	16
November	20
December	11



STATE OF WASHINGTON
BOARD OF PILOTAGE COMMISSIONERS

POLICY AND INTERPRETIVE STATEMENT

REGARDING: Definition of "Oil" Further Defined

It is the policy of the Board to affirm the definition of oil as included in the Interpretive Statement of ESHB 1578 Terms as follows:

It is the interpretation of the Board that, as per RCW 90.56.010 (19)⁶, the definition of "oil" or "oils" means oil of any kind that is liquid at twenty-five degrees Celsius and one atmosphere of pressure and any fractionation thereof, including, but not limited to, crude oil, bitumen, synthetic crude oil, natural gas well condensate, petroleum, gasoline, fuel oil, diesel oil, biological oils (see note 2 below) and blends, oil sludge, oil refuse, and oil mixed with wastes other than dredged spoil. Oil does not include any substance listed in Table 302.4 of 40 CFR 302 adopted August 14, 1989, under section 102(a) of the federal comprehensive 5 33 C.F.R. § 161.55 (2019) 6 Oil and Hazardous Substance Spill Prevention and Response, 90.56, R.C.W. § 010 (2015) Figure 1 Rosario Strait (red) and Connected Waterways East (blue) Adopted in regular session on September 17, 2020, by the State of Washington Board of Pilotage Commissioners. environmental response, compensation, and liability act of 1980, as amended by P.L. 99-499." Notes: (1) The Board considers diluted bitumen to be a part of this definition; (2) The Board considers biological oils to include: "fats, oils, or greases of animal, fish, or marine mammal origin; vegetable oils, including oils from seeds, nuts, fruits, or kernels" in alignment with Federal Regulations.

It is further the policy of the Board that the definition of oil as it pertains to tug escort requirements pursuant to 88.16.090 RCW in the Puget Sound or Grays Harbor Pilotage District does not include the following substances:

- Glycol
- Polypropylene Tetramer
- * Nonene

** Nonene doesn't show up on the CERCLA hazardous substance list, therefore it doesn't have a clear exclusion from the definition of oil. It would come down to how it is derived, and whether it met the 'any fractionation thereof' requirement. If it was synthetically reduced from the alkane (nonane) it would be excluded and not an oil. If it were isolated through fractional distillation – then it could meet the 'any fractionation thereof' requirement and be included as an oil.*

⁶Oil and Hazardous Substance Spill Prevention and Response, 90.56, R.C.W. § 010 (2015)



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BOARD OF PILOTAGE COMMISSIONERS

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COVERSHEET

TO: Board of Pilotage Commissioners
FROM: BPC Staff
DATE: November 20, 2024
SUBJECT: Puget Sound Pilotage Tariff Training Surcharge/Trainee Stipend Increase

The purpose of this memo is to supplement information provided in the Puget Sound Pilotage Tariff Training Surcharge/Trainee Stipend Increase Request memo presented to the Board in the regular public meeting on November 21, 2024.

Stipend Increase. Once the Board approves the memo, it will go to the UTC for approval and implementation in the tariff. Approval of the memo does not automatically increase the stipend we are currently paying. The effective date of the stipend increase will be further explored by the TEC and approved by the BPC at a later meeting.

Stipend Surcharge Collection. When trainees in the Pilot Training Program are actively taking stipend, they are included in the number reported to Puget Sound Pilots for application of the training surcharge. If we have 5 trainees active in the program taking stipend, we report 5 to PSP and the surcharge for each trainee is added to PSP's invoices to industry. In this example, the current surcharge of \$19/trainee/assignment would add \$95 for that assignment.

History of Stipend Payments. Up until February 2021, the BPC paid pilot trainees a \$6,000/month stipend. This amount was codified by the Board in October 2005 with a surcharge of \$10/trainee/assignment. In 2011, \$5/trainee/assignment was added to the surcharge to help fund the training program and exam process.

Consumer Price Index for Urban Areas (CPI-U). The BPC Staff memo presents a National Urban Area CPI inflation calculation. The attached sheet shows Seattle-Tacoma-Bellevue specific CPI data.

Los Angeles Port Pilots. In June 2024 the City of Los Angeles posting that they were accepting applications with a starting flat-rated salary of \$230,742 - \$250,560 for entry level positions, equivalent to our pilot trainees.

**Consumer Price Index for All Urban Consumers (CPI-U)
Original Data Value**

Series Id: CUURS49DSA0, CUUSS49DSA0
Not Seasonally Adjusted
Series Title: All items in Seattle-Tacoma-Bellevue, WA, all urban
Area: Seattle-Tacoma-Bellevue WA
Item: All items
Base Period: 1982-84=100
Years: 2014 to 2024

Year	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Annual	HALF1	HALF2	annual percent increase	applied to \$8,000
2014		242.770		246.616		247.642		247.185		247.854		245.050	246.018	245.125	246.912		
2015		245.496		247.611		251.622		251.617		250.831		250.385	249.364	247.614	251.115		
2016		250.942		253.815		256.098		256.907		256.941		256.821	254.886	253.122	256.651		
2017		259.503		261.560		263.756		263.333		264.653		265.850	262.668	260.656	264.680		
2018		268.031		270.309		272.395		271.625		272.805		273.293	271.089	269.527	272.652		
2019		275.304		276.765		278.631		280.286		278.682		279.421	277.984	276.230	279.738		
2020		282.115		280.484		281.055		284.905		284.505		283.409	282.693	281.281	284.105		
2021		286.950		290.068		296.573		299.704		303.099		304.856	295.560	289.628	301.493		\$ 8,000
2022		310.078		316.525		326.656		326.796		330.173		330.489	322.167	315.507	328.827	9.002%	\$ 8,720
2023		334.987		338.487		341.734		344.449		345.992		344.982	340.845	337.109	344.581	5.798%	\$ 9,226
2024		349.288		353.503		354.824		355.179		356.212			351.500	351.426		3.126%	\$ 9,514

Source:
[Regional Resources : U.S. Bureau of Labor Statistics](#)
 Click on "Seattle" under METRO AREAS (CBSA)
 ACCESSED 11/18/2024



STATE OF WASHINGTON
BOARD OF PILOTAGE COMMISSIONERS

2901 Third Avenue, Suite 500 | Seattle, Washington 98121 | (206) 515-3904 | www.pilotage.wa.gov

**Puget Sound Pilotage Tariff
Training Surcharge/Trainee Stipend Increase Request**

(Draft UTC Memo for Board Approval as Recommended by BPC Staff)

OBJECTIVE

At the November 21, 2024, monthly meeting of the Board of Pilotage Commissioners (BPC), the Board authorized the following additions to the Pilot Training Program:

- Simulator Training for Trainees - \$10,000 (assumes 3 trainees, 2 days at \$3,400/trainee/year)
 - Psychometric Review of the Training Program and Exam - \$50,000 (ongoing)
 - DEI Consultant - \$10,000 (ongoing)
 - COL Stipend Increase for Trainees - \$180,000 (from \$8,000/month to \$9,500/month)
-

SUMMARY

The mission of the BPC is to ensure against the loss of lives, loss of or damage to property and vessels, and to protect the marine environment by maintaining efficient and competent compulsory pilotage services in Washington waters; and not to place in jeopardy Washington state's position as an able competitor for waterborne commerce from other ports and nations of the world, but rather to continue to develop and encourage such commerce.

The BPC's Pilot Training Program, as provided in [RCW 88.16-090](#) and [WAC 363-116-078](#), is a key BPC program that supports this mission. Once successful candidates from an exam are called into the Pilot Training Program, they begin training on a rigorous full-time schedule and must resign from all other employment. Pursuant to [WAC 363-16-078\(11\)\(c\)](#), the BPC currently pays up to \$8,000/month in stipends to trainees while they are in program.

The Trainee Evaluation Committee (TEC) has recommended that the Board:

- Provide simulator training to trainees as a part of the Pilot Training Program in the Puget Sound Pilotage District (PSPD).
- Seek psychometric re-validation of the Pilot Training Program for both districts

- Obtain the services of a DEI consultant to prepare and recruit for the 2026 and future exams, as well as assist DEI efforts in the Pilot Training Program
 - Increase the training stipend in the PSPD due to cost-of-living increases in the area to remain competitive with other pilotage districts
-

BACKGROUND

The Pilot Training Program consists of observation, training, and evaluation. Observation is aimed at familiarization of different locations, piloting styles, and types of vessels. Training provides the trainee with hands-on experience. Trainees are required to take local knowledge quizzes, also called Conning Quizzes, before they are permitted to take over the navigational duties on the bridge of a ship. Evaluation requires the trainee to make evident to the BPC that their performance demonstrates they have developed the requisite professional skills for licensing. The trainees are supervised by licensed pilots who have completed Train-the-Trainer courses provided by the BPC. The PSPD training program is limited to 36 months. Most trainees complete the program in 16-20 months.

The number of trainees in the Pilot Training Program has increased in the last several years. The increase is due to the high number of projected and mandatory retirements of active pilots over the next several years, increase in vessel traffic, the 2019 legislative increase in the mandatory rest period between assignments from 7 hours to 10 hours, and the BPC's recent decision to increase the number of authorized licenses in the PSPD from 56 to 60. The TEC has determined that 10 is the maximum that the training program can reasonably sustain at a time based on projected vessel traffic, available trips for training, and Board staff workload.

TRAINING PROGRAM ADDITIONS

The BPC's Pilot Training Program is a robust and challenging program preparing pilots for safe transit in the narrow, hazardous, and congested waterways of Puget Sound and Grays Harbor. The following items are training program expansions the Board is seeking:

Simulator

The BPC believes that adding simulator training to the PSPD Pilot Training Program would be of great value as a training tool, especially for the narrow waterways and other navigational difficulties in Puget Sound. Trainees will benefit from having hands-on training with no physical risk, especially when learning to maneuver large vessels in tight spaces, like the Blair Waterway.

The simulator training would be for trainees preparing to transition from hands-on training to evaluation. BPC believes this is the ideal time for precision simulator work as the trainee prepares for the final and critical step of the program, which tests them on their ability to safely and independently pilot.

Psychometric Re-validation

The BPC Marine Pilot Exam process is required by [WAC 363-116-076](#) to be compliant with psychometric standards as put forth by *The Standards for Educational and Psychological Testing*. In 2016 and 2017, the Board contracted with Dr. Norman Hertz for a psychometric review and

validation of the Pilot Training Program. This work led to revisions to the Training Program Trip Report (TPTR), tying the components of the report to the Job Task Analysis (JTA) conducted as a part of the 2016 Marine Pilot Exam psychometric development process.

For the 2024 Exam, the Board began working with a new psychometrician for the first time since 2008. As the training program has evolved since the last psychometric validation, the Board believes it is important for ongoing psychometric review of both the Exam and Pilot Training Program to assure adherence to the Board's high standards for training and current psychometric standards.

Diversity, Equity, Inclusion, and Belonging

The BPC's top priority is safe pilotage in Washington state. In addition to the highly specialized and effective training program, strict rest requirements, focus on safe pilot transfer, and other safety-first initiatives on and off the water, the BPC believes that safety stems from trust and engagement. A culture of belonging is essential to embracing diversity, equity, and inclusion as well as fostering trust and engagement. The BPC strives for every pilot, pilot trainee, applicant, aspirant, and employee to see Washington state pilotage as a place they belong and in which they are reflected. The BPC is working toward establishing a pilot corps that reflects the people of Washington state by increasing the diversity of state licensed pilots and creating a culture of belonging where all perspectives are valued and welcomed.

To succeed in diversifying the pilotage corps, the BPC seeks ongoing support by a DEI consultant to conduct research regarding USCG licenses, assist with recruitment for diverse applicants, review messaging, and provide insights into exam and training program improvements.

Stipend Increase

A strong pool of highly qualified pilot aspirants is imperative to filling available and authorized pilot positions. To attract the mariners required, Washington state needs to remain competitive with other pilotage districts, and specifically west coast pilotage districts.

When a captain is ready to pursue pilotage, they are typically at the top of their maritime career, established, and nearly at or well into their midlife. They are not typically a young, encumbered person. Trainees are not employees of the BPC or Washington state. The stipends they receive are to assist with living costs while in the Pilot Training Program. Stipends are not a payment for a service, as trainees are learning to pilot and not providing a service to the state. In addition, trainees are responsible for obtaining their own health insurance. The BPC and Washington state do not offer benefits as a part of the training program in the Puget Sound Pilotage District (PSPD). Trainees in the Grays Harbor Pilotage District (GHPD) are employed by the Port of Grays Harbor and do not receive a training stipend from the BPC.

The pool for qualified mariners to enter the pilotage pipeline is a small one. Pilotage districts, especially on the west coast, are typically in competition with each other for the same qualified aspirants. The BPC does not have specifics for each candidate's decision to train in either district. However, we are aware of several factors that go into the decision including pay, cost of living, schedule, rank on the waiting list, and familial ties.

In Q2 of 2024, Seattle was one of the most expensive urban areas per The Council for Community and Economic Research.

[PRESS RELEASE – For Immediate Release – COLI Q2 – C2ER Cost of Living Index](#)

The Ten Most and Least Expensive Urban Areas in the Cost of Living Index (COLI) Review of Quarter Two in 2024 National Average for 251 Urban Areas = 100					
Most Expensive			Least Expensive		
Ranking	Urban Areas	COL Index	Ranking	Urban Areas	COL Index
1	New York (Manhattan) NY	226.0	1	Ponca City OK	79.4
2	Honolulu HI	188.4	2	Decatur IL	79.7
3	San Jose CA	180.8	3	Richmond IN	80.9
4	San Francisco CA	167.4	4	Oklahoma City OK	81.3
5	New York (Brooklyn) NY	160.2	5	Amarillo TX	82.5
6	Orange County CA	155.3	6	Jonesboro AR	82.8
7	Los Angeles-Long Beach CA	148.6	7	Pittsburg KS	83.0
8	New York (Queens) NY	148.1	8	Harlingen TX	83.0
9	Seattle WA	146.3	9	Florence AL	83.1
10	San Diego CA	145.6	10	Tupelo MS	83.1

The BPC’s last stipend increase went into effect in February 2021. Using the [CPI Inflation Calculator](#), \$8,000/month in 2021 compares to \$9,500 in 2024.

CPI Inflation Calculator

\$

in

has the same buying power as

in

Washington state’s pilotage districts are in direct competition with California districts, and more specifically with San Francisco. It is not uncommon for our two states to share candidates on the waiting list to enter training.

In looking at other west coast pilotage groups, BPC, through the San Francisco BOPC’s Trainee Stipend Staff Report and through direct conversations, found that:

- Trainees contract directly with the pilot associations, either Columbia River Pilots or the Columbia River Bar Pilots, and are paid a share of the pilot’s earnings while training. The Oregon Board of Maritime Pilots does not pay a training stipend for pilot trainees.¹
- The Board of Pilot Commissioners for the Bays of San Francisco, San Pablo, and Suisun increased their monthly training stipend from \$7,000/month to \$8,000/month in January 2023.
- Los Angeles Port Pilots are county employees and are paid a county salary with full benefits to train, like the Grays Harbor Pilotage District in WA State.²

¹ From BOPC’s Trainee Stipend Staff Report as presented to the BOPC on July 23, 2019

² From BOPC’s Trainee Stipend Staff Report as presented to the BOPC on July 23, 2019

- The Alaska Board of Marine Pilots does not pay a stipend to trainees during training (training is seasonal, largely dependent on cruise ship traffic).

The BPC is required to offer an exam at least every four years. We anticipates holding another pilot exam in 2026. It is projected that those on the 2024 exam waiting list will be brought into the training programs for either the PSPD or the GHPD by then.

Current Surcharge

The [Puget Sound Pilotage Tariff](#), pursuant to [RCW 81.116.020](#), requires the UTC to include a tariff surcharge to fund the stipend the Board of Pilotage Commissioners is authorized to pay to pilot trainees and to use in its pilot training program under [RCW 88.16.035](#).

Per RCW [RCW 81.116.020](#) (4), in setting tariffs, the UTC may fix extra compensation for extra services to vessels in distress, for awaiting vessels, for all vessels in direct transit to or from a Canadian port where Puget Sound pilotage is required for a portion of the voyage, or for being carried to sea on vessels against the will of the pilot, and for such other services as may be determined by the board. In setting tariffs, the commission must include a tariff surcharge to fund the stipend the board of pilotage commissioners is authorized to pay to pilot trainees and to use in its pilot training program under [RCW 88.16.035](#).

This surcharge funds the BPC’s Pilot Training Program and Marine Pilot Exam. Initially, the stipend surcharge was based on 7,200 assignments per year to break even. Effective in 2021, \$13.50 of the \$19.00 surcharge is the pass-through cost of stipends, paid directly to qualifying trainees per [WAC 363-116-078\(11\)](#). The remaining \$5.50 funds the BPC’s training program, including the exam process.

PSPD Training Surcharge Increase

The table below indicates potential revenue collected through increases in the Training Surcharge and increased stipend pass-through to trainees. These calculations assume 7,200 pilotage assignments per calendar year and 10 trainees in the program. Actual numbers may vary depending on how many are in the program at any given time:

Current Training Surcharge per assignment, per trainee	Annual Surcharge Revenue @10 Trainees 7200 assignments	Stipend-only pass through	Annual Stipend Total @10 Trainees \$8,000 per month	Remaining Funds for Training Program Related Expenses
\$19.00	\$1,368,000	\$972,000	\$960,000	\$396,000
\$13.50 pass thru for stipends				
\$5.50 remaining funds for training program related expenses				
Proposed Training Surcharge per assignment, per trainee	Annual Surcharge Revenue @10 Trainees 7200 assignments	Stipend-only pass through	Annual Stipend Total @10 Trainees \$9,500 per month	Remaining Funds for Training Program Related Expenses
\$23.00	\$1,656,000	\$1,152,000	\$1,140,000	\$504,000
\$16.00 pass thru for stipends				
\$7.00 remaining funds for training program related expenses				

CONCLUSION

The BPC is requesting Training Surcharge to increase from \$19.00/trainee/assignment to \$23.00/trainee/assignment. The pass-through cost to trainees would increase from \$13.50/trainee/assignment to \$16.00/trainee/assignment. The amount to the BPC would increase from \$5.50/trainee/assignment to \$7.00/trainee/assignment. The proposed surcharge increase would provide an extra \$108,000+/- to the BPC for the initiatives listed above and the increased stipend will assist pilot trainees the ability to transition from their established careers to training here in the Pacific NW.

Due to our area's cost of living increases, an increase in authorized pilot licenses, changes in rest rules, retirements, and a small national pool of qualified pilot aspirants, it is imperative that Washington state's pilotage districts continue to attract pilot aspirants by offering a first-rate pilot training program and reducing the financial burden on trainees during this critical phase in their careers. It is also imperative that the BPC receive the necessary funding for the training program to prepare pilot trainees for piloting in Washington state's inland waters.



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Meeting Minutes – Pilot Safety Committee (PSC)

August 12, 2024, 10:00 AM

Attendees: John Scragg (PSP), Andrew Drennen (BPC), Ryan Leo (PGH), Sheri Tonn (BPC), Jaimie Bever (BPC), Eleanor Kirtley (BPC), Mike Moore (PMSA), Ivan Carlson (PSP), Scott Anacker (PSP), Ivan Carlson (PSP), Bettina Maki (BPC)

Regrets: Jason Hamilton (BPC)

1. Review of Minutes of previous meeting on May 6.

The minutes were approved. Mike Moore asked about the minutes of the first TAL workshop (the first TAL workshop was the second half of the May 6 meeting). Bettina explained that the May 6 TAL workshop minutes had already been reviewed at the second TAL workshop (also in May) – all four TAL workshop meeting minutes were drafted and approved by the Pilot Safety Committee in order to present the committee’s TAL recommendation to the Board in June. Andrew Drennen noted that the notes for all four TAL workshops were available on the BPC website with other Board meeting materials for June 2024.

2. Rest Rule Exceptions

During 2024 Q2 in Grays Harbor there were zero (0) rest exceptions.

During 2024 Q2 in Puget Sound there were five (5) exceptions to the 10 hour rest rule – two of those were urgent responses to a vessel dragging anchor and two were related to “pilot being assigned early” or “pilot boat left too early”. There were three (3) exceptions to the 13 hour rest rule – one of those was related to a grain ship departure delay, and two were related to “last assignment assigned out of 13 hour window”.

Committee members asked how it is determined which pilot to assign to an emergent situation. Ivan Carlson explained it is usually whichever pilot is closest to the situation, though if the situation is near the pilot station and multiple pilots are at the station, then other factors will be considered.

Another question was about asterisks next to vessel names on the PSP rest exception report. It was clarified that the asterisks are not related to the rest exception. They usually refer to notes about the vessel.

3. Noncompliant Pilot Transfer Arrangements

Pilots' reports of noncompliant transfer arrangements from the 2nd quarter of 2024 were reviewed and discussed, as well as the Jotform data summary of the reports. The data summary will be shared with the Board.

Scott Anacker noted that increased attention is being paid to the condition of pilot ladders and replacement of old ladders in poor condition. He again mentioned Matt Hannuksela's efforts to inform ladder manufacturers about compliance standards – some manufacturers are not following standards for ladder markings/placards which is further confusing issues of noncompliant ladder certificates.

He also shared the IMPA update on the IMO Sub-Committee responsible for Amendments to SOLAS Regulation V/23 and Associated Instruments, which concluded in June. The modified pilot ladder poster still needs to be finalized, approved, and adopted.

4. Updates/Pending Issues

~ MSO Form Categories & MSO Form Revision

John Scragg will be working with Nick Moore on MSO categories for the MSO form revision and will offer an update at the next PSC meeting.

~ Engine Limiters

John Scragg has been doing some research on Engine Limiters and will share at the next PSC meeting. He noted a recent MSO related to an engine limiter, and has reviewed the Coast Guard letter but still has questions.

5. Adjournment/Next Meeting

The committee discussed the best day & time for the next meeting and settled on Thursday, Nov 7 at 10:00am. (Ivan Carlson noted that Tuesdays and Thursdays are the best meeting days for PSP.)

The meeting was adjourned at 10:45am.

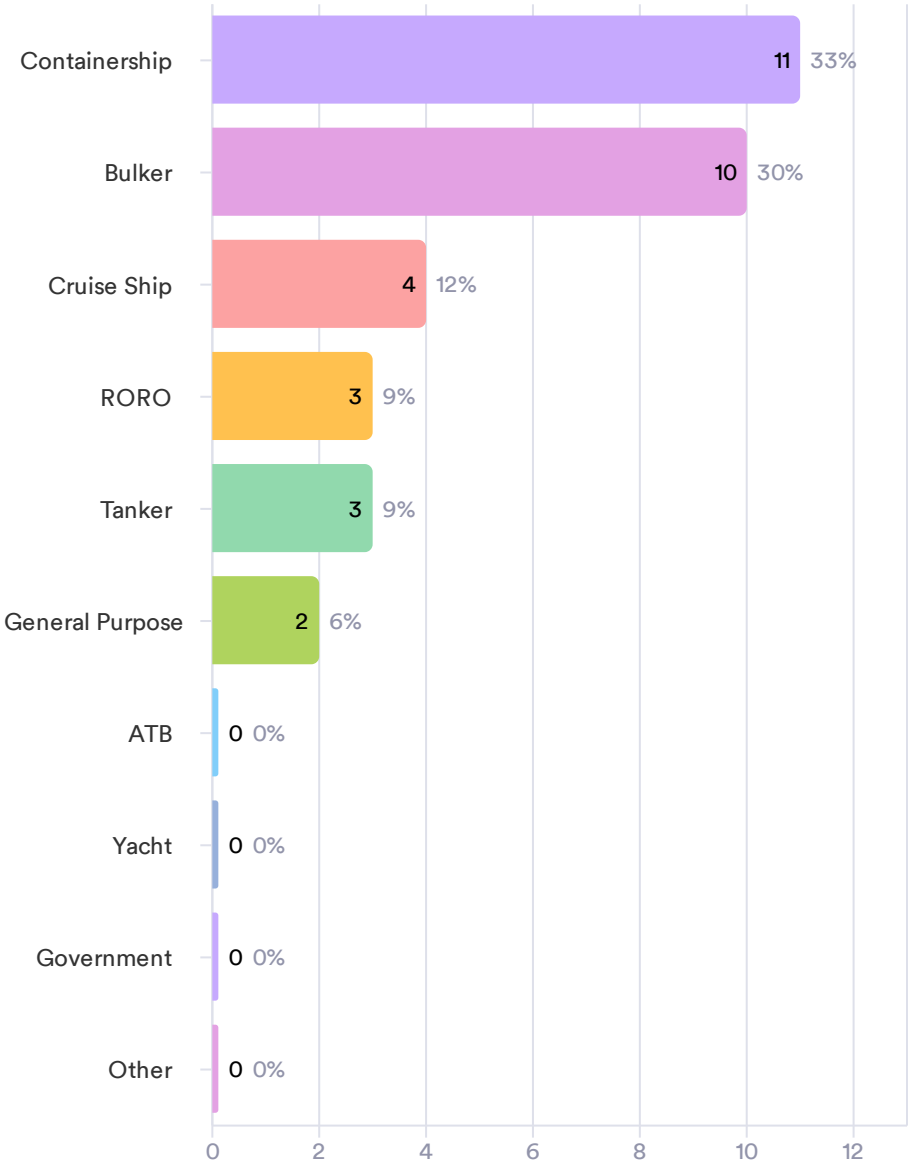
Pilot Ladder Safety Summary

Washington State (PS & GH 7/1/24 - 9/30/24)

Pilot Ladder Safety Report

Vessel Type:

33 Responses



Vessel Name:

33 Responses

Data	Responses
Carnival Spirit	2
Niriis	2
MSC Vilda X	1
COSCO Venice	1
SM Tainjin	1
Golden Globe	1
Pan Concord	1
Lisa	1
Greenville	1
Antares	1
One Magdalena	1
NACC Poros	1
Clearocean Mary	1
Saga Bellin Elix	1

Pilot Ladder Safety Report

Flag State:

33 Responses

Data	Responses
LBR	8
MHL	6
PAN	6
BHS	4
HKG	4
USA	1
MLT	1
PRT	1
NLD	1
JPN	1

Classification Society:

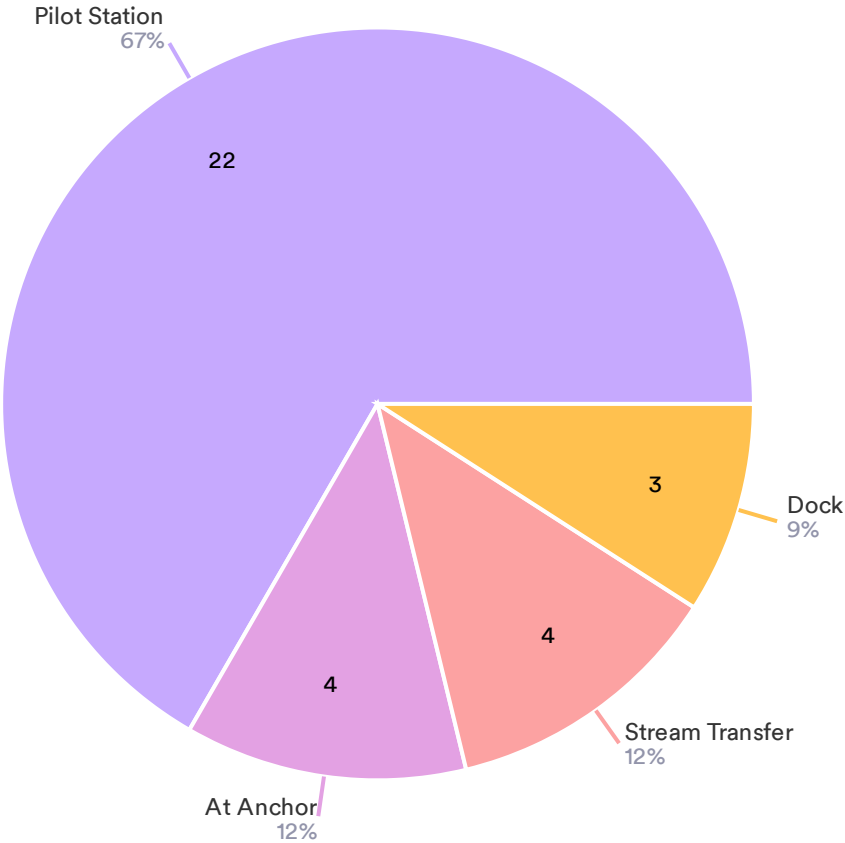
14 Responses

Data	Responses
NK	3
ABS	3
LR	2
RINA	2
KR	1
DNV	1
BV	1
NS	1

Pilot Ladder Safety Report

Geographic Location:

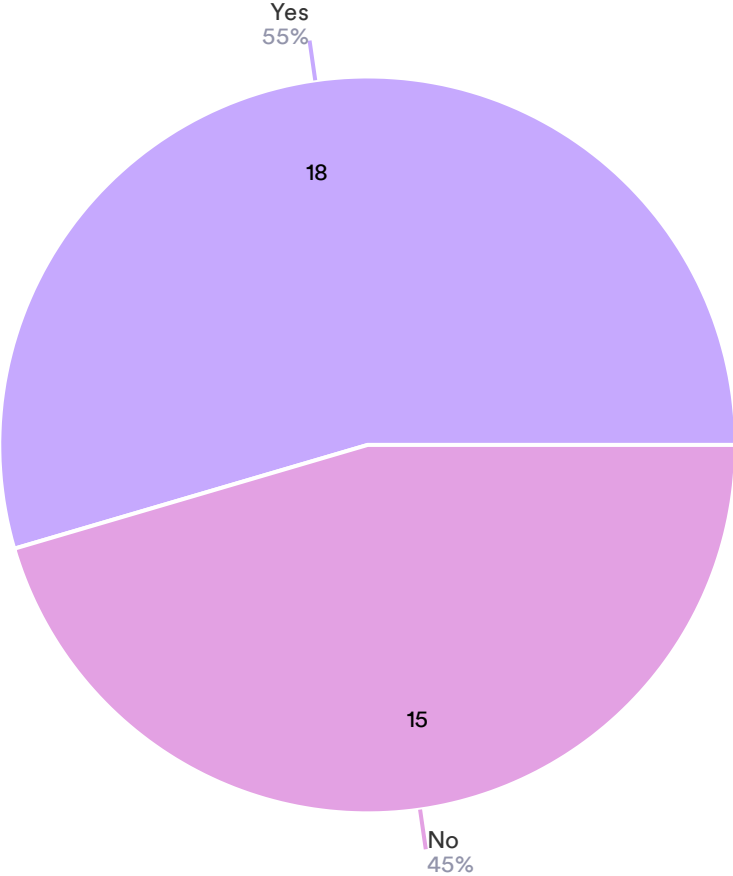
33 Responses



Pilot Station At Anchor Stream Transfer Dock

Master Notified:

33 Responses

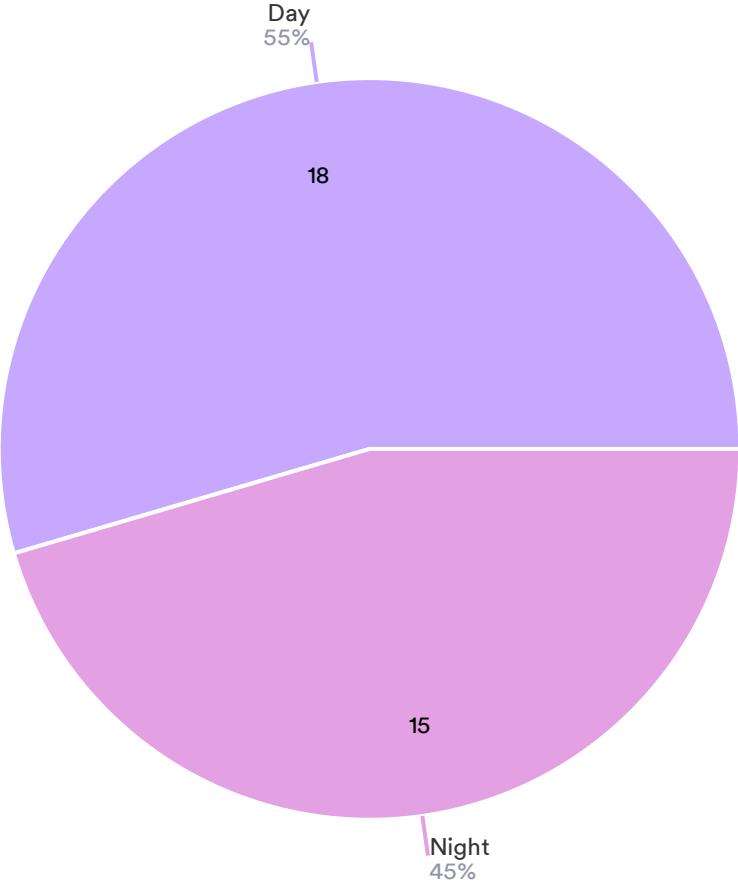


Yes No

Pilot Ladder Safety Report

Day/Night:

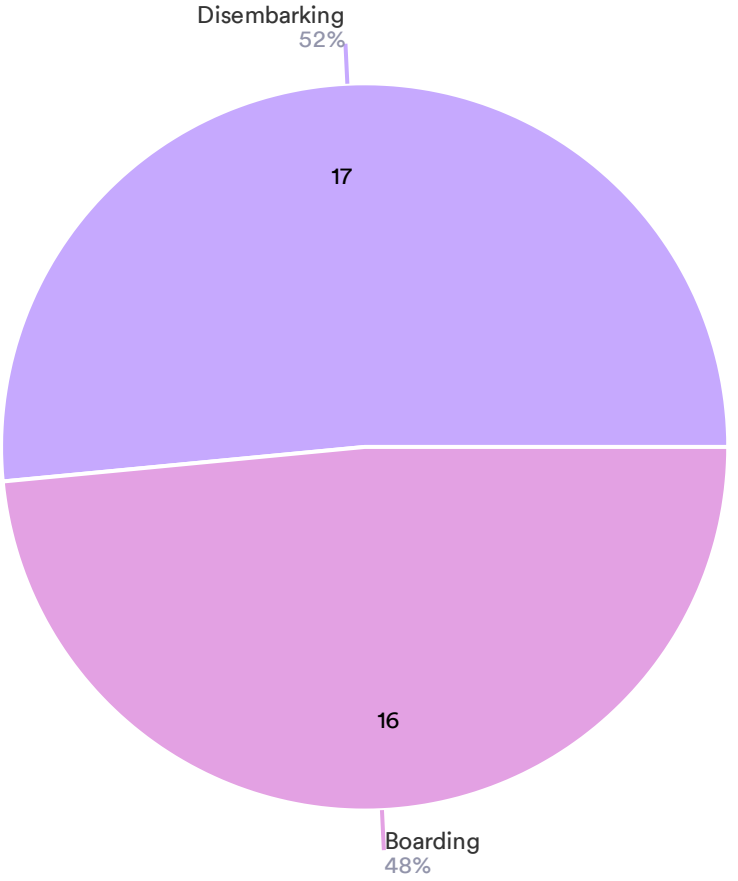
33 Responses



● Day ● Night

Boarding/Disembarking:

33 Responses

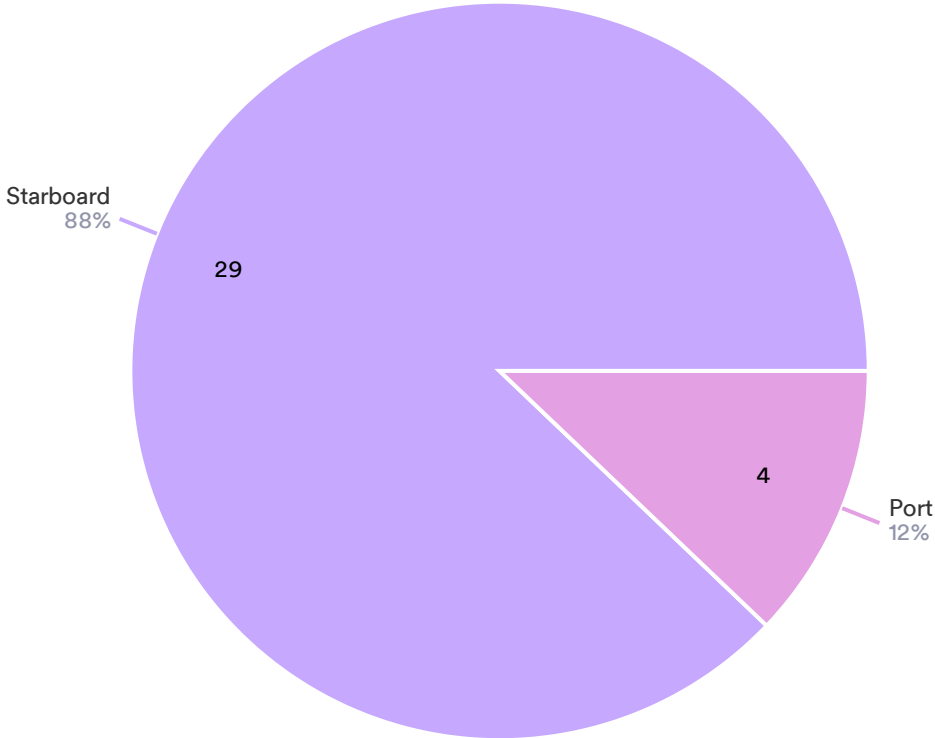


● Disembarking ● Boarding

Pilot Ladder Safety Report

Port/Starboard:

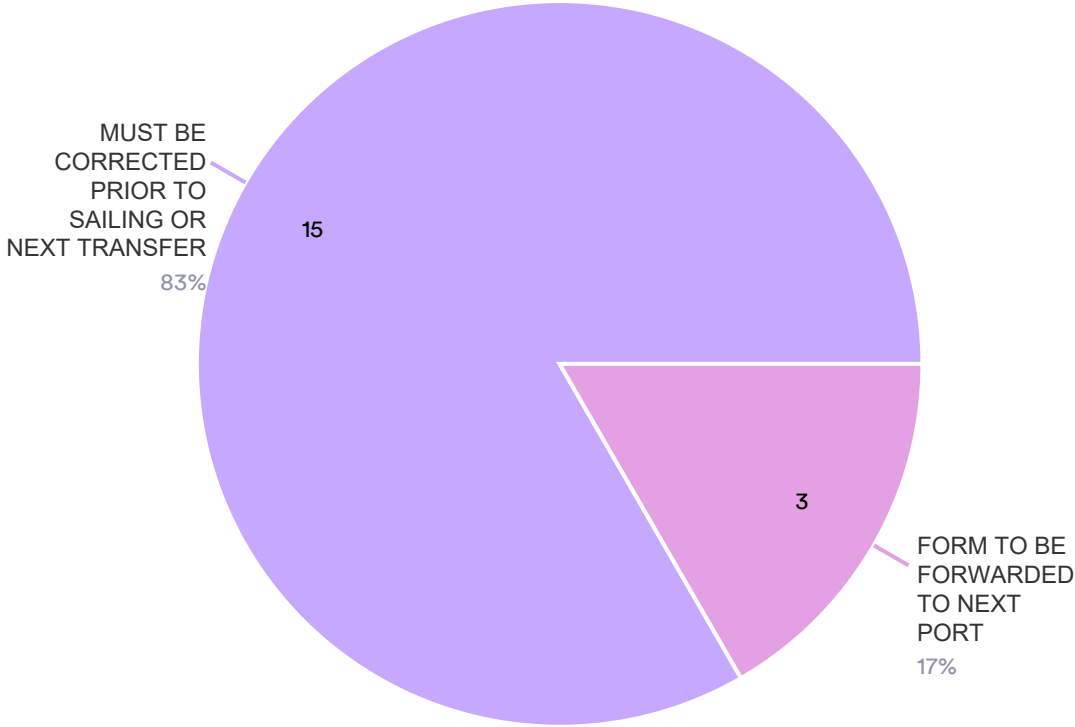
33 Responses



● Starboard ● Port

Notification:

18 Responses

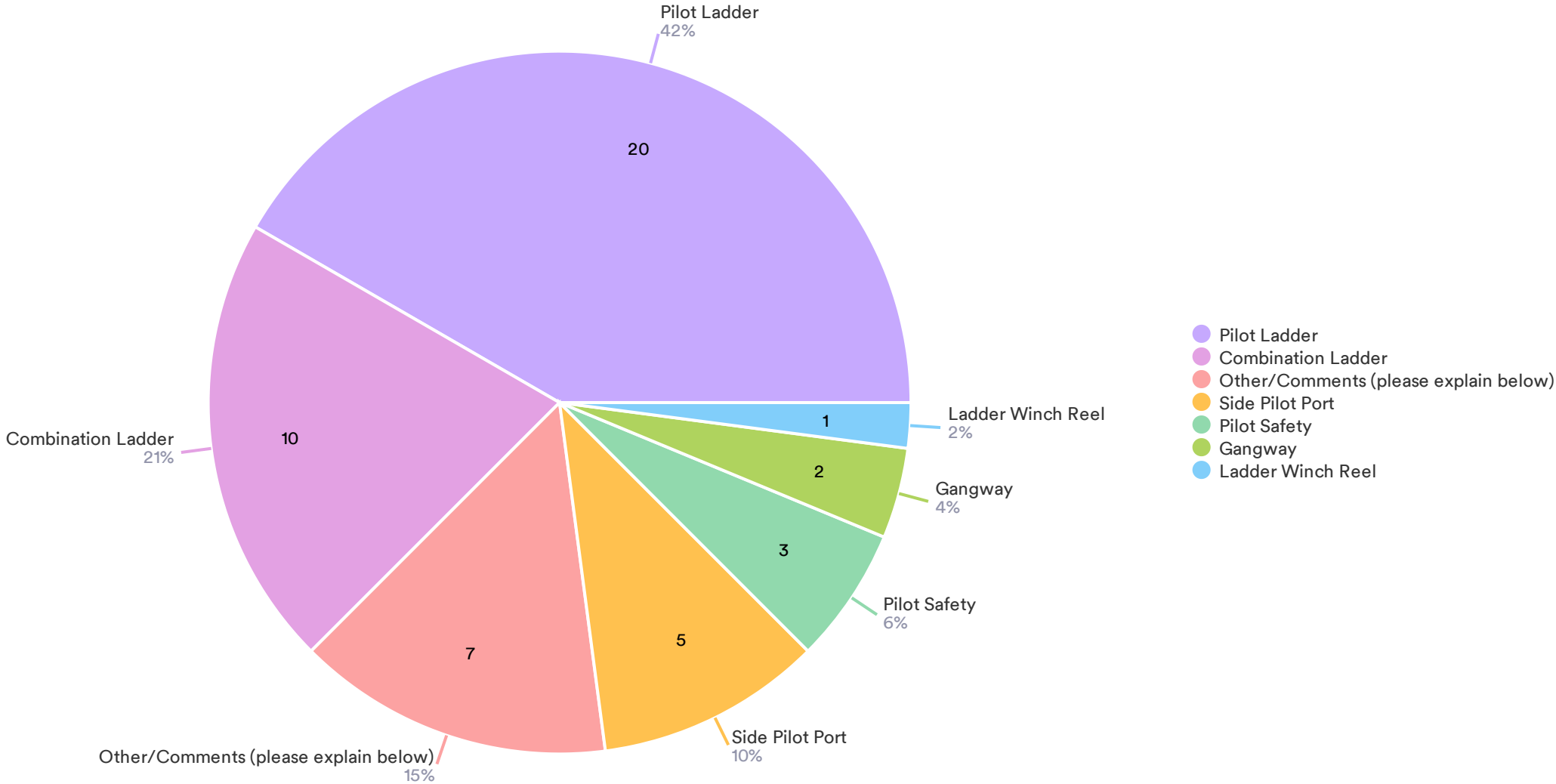


● MUST BE CORRECTED PRIOR TO SAILING OR NEXT TRANSFER
● FORM TO BE FORWARDED TO NEXT PORT

Pilot Ladder Safety Report

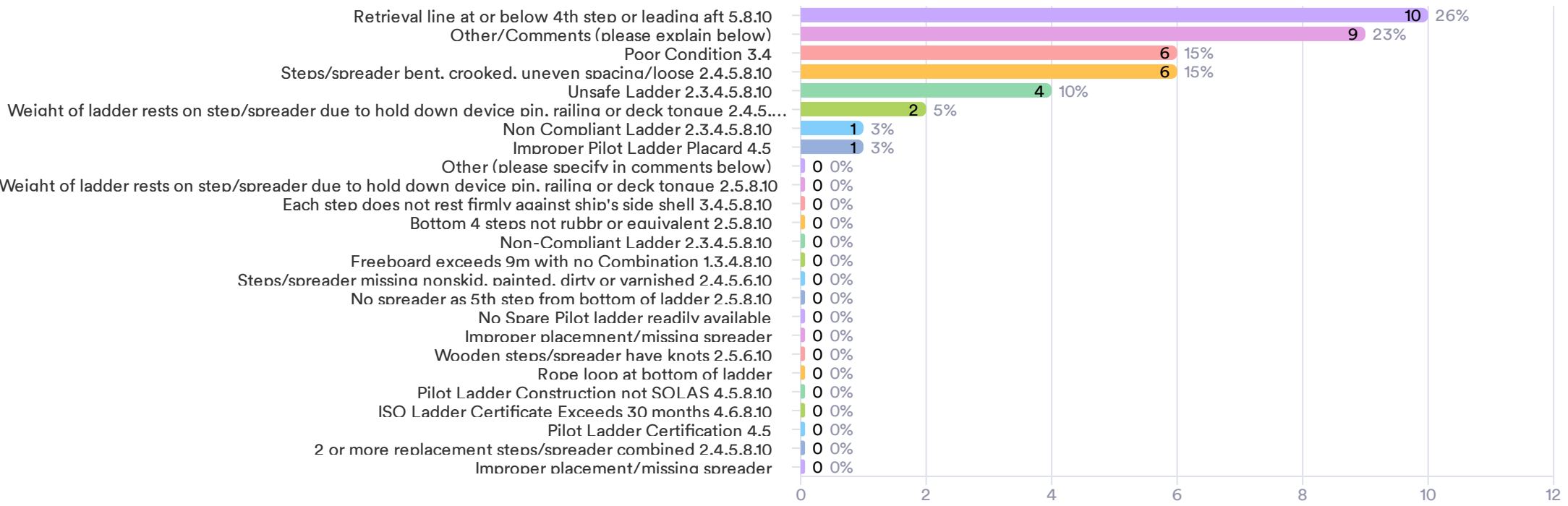
Non-Compliance:

48 Responses

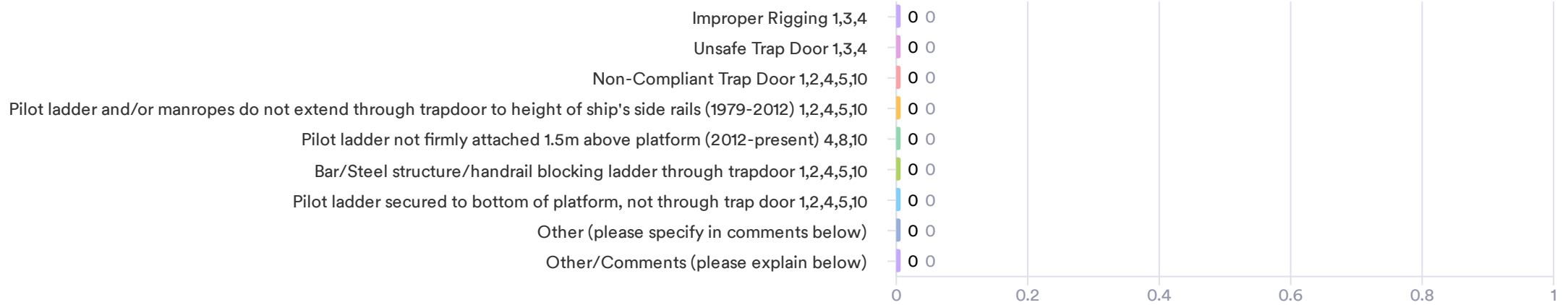


Pilot Ladder Safety Report

Pilot Ladder:

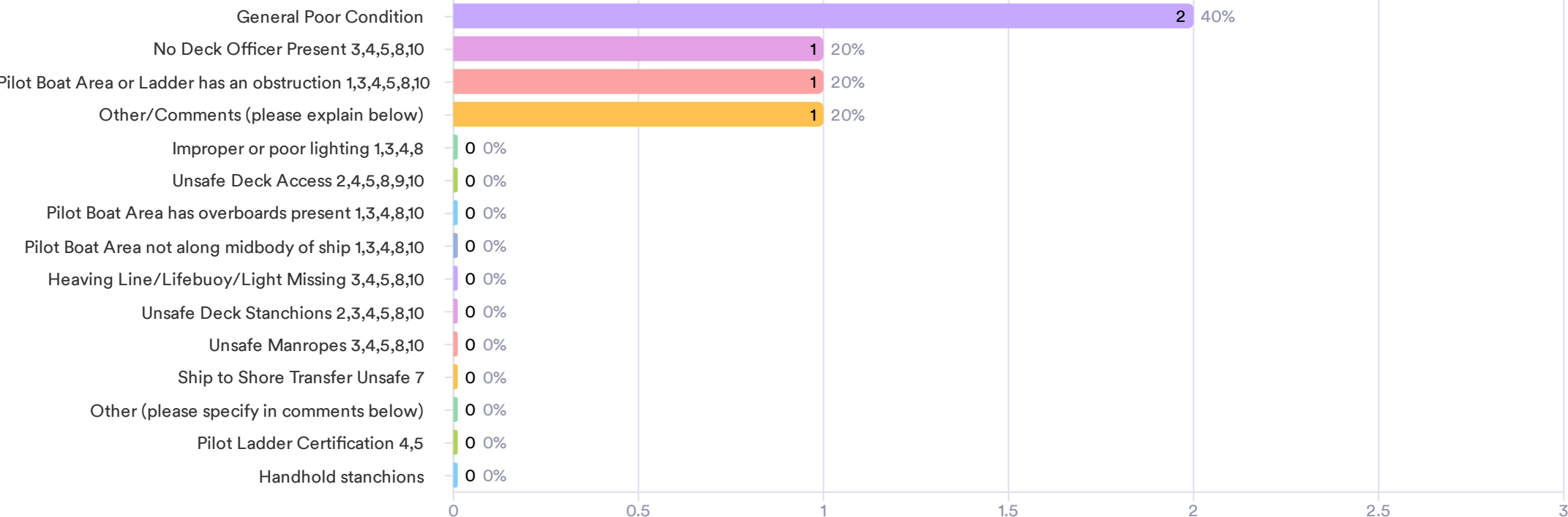


Trap Door Combination Ladder:

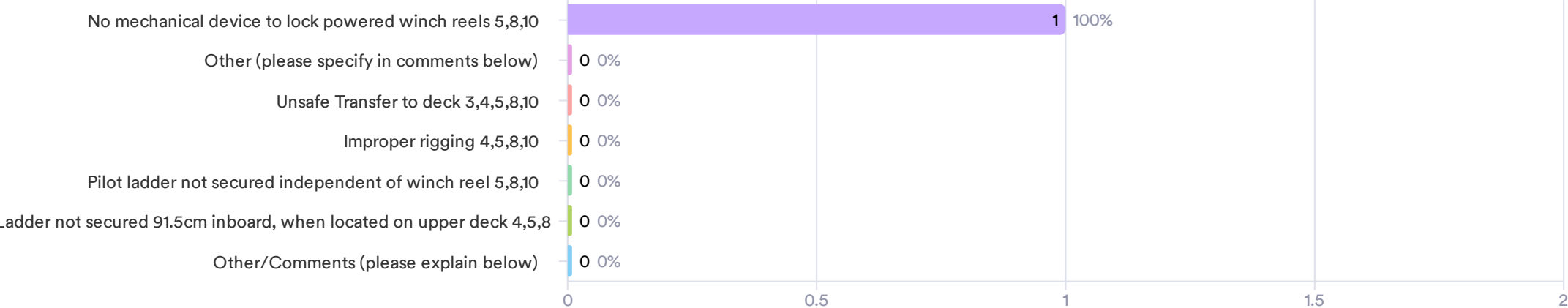


Pilot Ladder Safety Report

Pilot Safety:

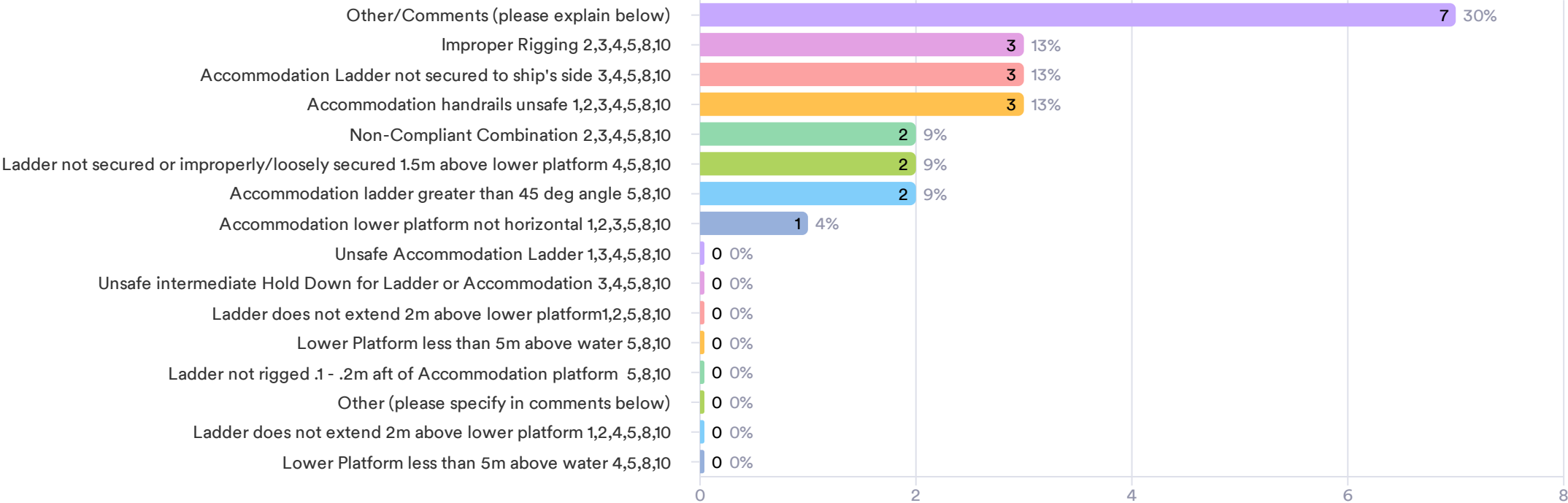


Ladder Winch Reel:

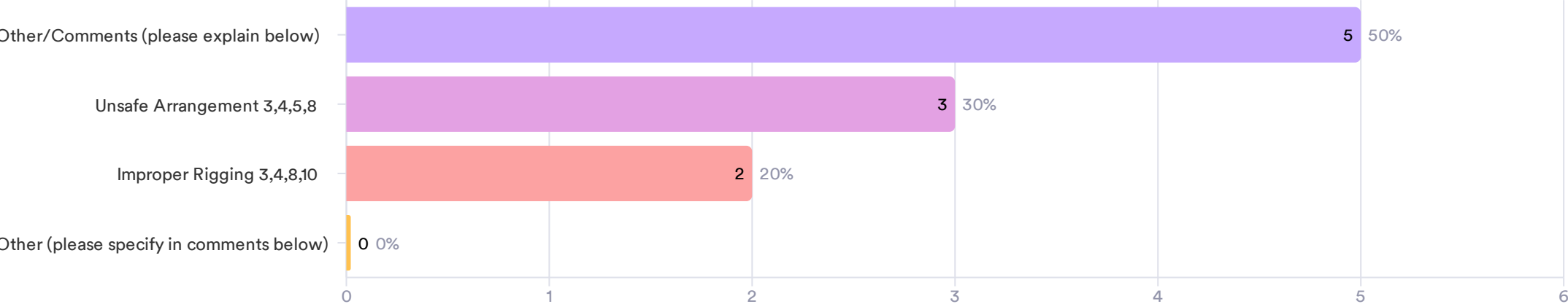


Pilot Ladder Safety Report

Combination Ladder:



Side Pilot Port:





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Meeting Minutes – Oil Transportation Safety Committee (OTSC)

July 17, 2024, 1:00pm – 3:00pm

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), JD Ross Leahy (Ecology Alternate/BPC), Blair Bouma, (Pilot/PSP), Jeff Slesinger (Tug Industry/Delphi Maritime), Clyde Halstead (Tribal Government/Swinomish), Antonio Machado (Oil Industry/WSPA), Kyle Burleson (Oil Industry Alternate/WSPA), Sheri Tonn (ex officio/BPC), John Robertson (Advisory/USCG), Peter Schrappen (Tug Industry Alternate/AWO), Fred Felleman (Environment/Friends of the Earth), Rein Attemann (Environment Alternate/WEC), Allen Posewitz (Ecology SME)

1. Welcome & Meeting Minutes

Jaimie Bever (OTSC Chair/BPC) welcomed everyone to the meeting. She mentioned that she had sent out the minutes for the June 18 meeting and that those had also been provided to the Board in draft form to help inform the July 18 Board decision regarding escort tug functional and operational requirements. Jaimie then introduced the presentation team including Megan Hillyard, Allen Posewitz, Haley Kennard.

2. Meeting Reminders and Logistics

Jaimie reminded everyone to use the “raise hand” and “comment” function, as well as to mute microphones when not speaking.

3. Meeting Agenda

Jaimie then reviewed the agenda for the meeting:

- Rulemaking Overview & Background
- Economic Analysis Overview
- Update on Methods Summaries for EIS Analysis
- Update on Proposed Timeline and Milestones for Draft EIS Development

4. Roles and Responsibilities

For the rulemaking, the BPC roles and responsibilities include:

- Outreach lead
- Government-to-Government Consultation
- Final Decisions on Tug Escort Requirement

Ecology's roles and responsibilities include:

- Rulemaking process
- Technical Expertise
- Regulatory Analyses
 - Administrative Procedures Act (APA)
 - State Environmental Policy Act (SEPA)
 - Regulatory Fairness Act (RFA)




5. Rulemaking Overview

Jaimie explained that the BPC, in consultation with Ecology, must adopt tug escorts rules for the following vessels:

- Small (5,000 – 40,000 dwt) oil tankers
- ATBs, and towed barges greater than 5,000 dwt designed to transport oil in bulk internal to the hull

6. Target Vessels (Examples)

After the last workshop, there was a request to provide some more information about the size of the vessels for this rulemaking in more plain language (as DWT may not be intuitive for everyone attending these workshops). The team pulled together some example vessels on the high and low end of the range of vessels that would fall into this “target vessels” category for reference.

Vessel Type	Tanker	ATB	Towed Barge
			
Smaller Range Example	520 feet / 25,235 DWT	421 feet / 11,500 DWT	241 feet / 5,310 DWT
Larger Range Example	604 feet / 39,309 DWT	690 feet / 27,000 DWT	360 feet / 13,821 DWT

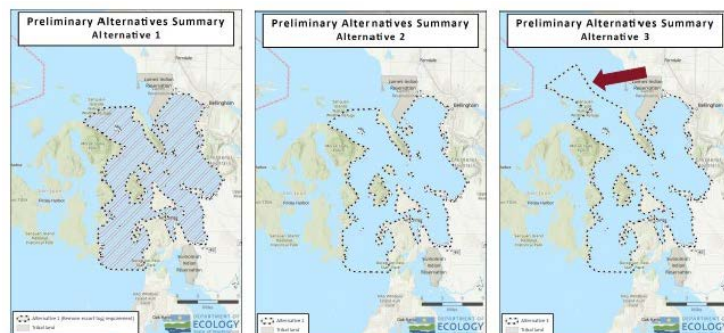
7. BPC Vote: Preliminary Alternatives Summary

The Oil Transportation Safety Committee presented their recommendations to the BPC at the March 21, 2024 Regular Public Meeting. Three alternatives on the slide were approved for the SEPA analysis:

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

Alternative 2 – Maintain Rosario and waters east requirement (current – no action)

Alternative 3 – Maintain Rosario and waters east requirement and expand to Strait of Georgia South, and a corner of Strait of Georgia – extending along the northern edge San Juan Islands as emphasized by the arrow.



8. BPC Vote: Elements of the Environment

In addition to the Preliminary Alternatives, the OTSC also recommended Elements of the Environment to be included in the EIS. The Board adopted the recommendation as proposed.

REMINDER: The Board will be voting on the tug escort operation and functionality recommendation

at the July 18 meeting which is this Thursday.

Element	Include in EIS
*Air Quality and GHG Emissions	Yes
Water Quality	Yes
*Plants and Animals (incl. SRKW, marine mammals)	Yes
Energy and Natural Resources	Yes
*Environmental Health: Releases (oil spills)	Yes
*Environmental Health: Noise (incl. underwater noise, ambient/operational noise)	Yes
Aesthetics, Light, and Glare	Yes
*Tribal Natural and Cultural Resources	Yes
Historic and Cultural Resources (other, non-tribal)	No
*Transportation: Vessel Traffic	Yes

Note: BPC support for focus on environmental justice - to be integrated throughout and its own chapter
* = Priority Element as identified by the BPC

Jaimie then handed the presentation over to Allen Posewitz, Economic Analyst, for the Economic Analysis Overview.

9. Economic Analysis Overview

Allen introduced himself.

10. Introduction to Economic Analysis at Ecology

He then explained that he would be providing a brief introduction to economic analysis at Ecology, starting with a general description of economists at Ecology do, and then talk about some issues pertaining the economic analysis of this rulemaking on tug escorts.

11. Economic Work in Ecology's 11 Programs

The Spills Prevention, Preparedness and Response program is one of Ecology's 11 programs that this team of economists work with. They use real-world economic data and comprehensive analysis and modeling to examine potential impacts from changes in environmental policies and regulations in Washington.

In addition to reaching out to potentially impacted stakeholders to assist in data collection and fact-checking, they consult published literature and other state, federal, and local agencies during data collection and analysis.

The economic analyses support:

- Rulemakings
- General permits
- Legislative reports and requests, Chemical Action Plans, etc.
- Other projects as needed

The economic analysis relies on:

- Real world quantitative data
- Qualitative information

- Regional economic models (REMI)

12. Typical Economic Analysis During Rulemaking

Two economic publications accompany a rulemaking.

Proposal Phase (CR-102)	<ul style="list-style-type: none"> • Preliminary Regulatory Analysis(PRA) document published with Proposed Rule Language
Comment Period	<ul style="list-style-type: none"> • Comments on Preliminary Regulatory Analyses accepted with comments on rule language
Adoption Phase (CR-103)	<ul style="list-style-type: none"> • Final Regulatory Analysis (FRA) document published with Final Rule Language • Response to economic comments in CES

The PRA accompanies the proposed rule language. They respond to feedback with a set of concise explanatory statements, or possibly by modifying the FRA based upon comments received.

13. Key Laws Governing Rulemaking

APA – Administrative Procedures Act (Chapter 34.05 RCW)

“Determine that the probable benefits of the rule are greater than its probable costs, taking into account both the qualitative and quantitative benefits ...”

“Determine, after considering alternative versions of the rule and the analysis required ... that the rule being adopted is the least burdensome alternative for those required to comply with it that will achieve the general goals and specific objectives stated ...”

14. Small Business Impacts – RFA

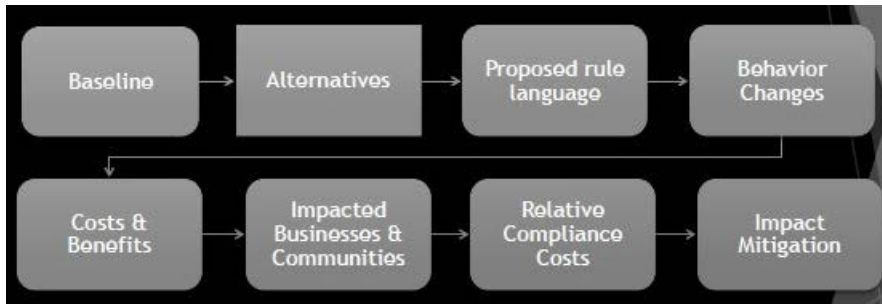
The small business impact statement (SBEIS) is developed for proposed rules that might impose more than minor costs on businesses. The purpose of the SBEIS is to look at how a rule might impact small businesses compared to large businesses. When these impacts are identified, we must try to find legal and feasible ways to mitigate those impacts.

The SBEIS, when required, is included in the regulatory analysis documents (PRA and FRA). SBEISs include a description of the:

- Compliance requirements in the proposed rule and estimated costs of compliance
- Comparison of compliance costs between small businesses and the largest businesses covered under the proposed rule
- Legal and feasible methods for mitigation of economic impacts

15. Analysis

He then shared a flowchart of the economic analysis process:



16. Baseline: Existing Laws and Rules without the Proposed Rule

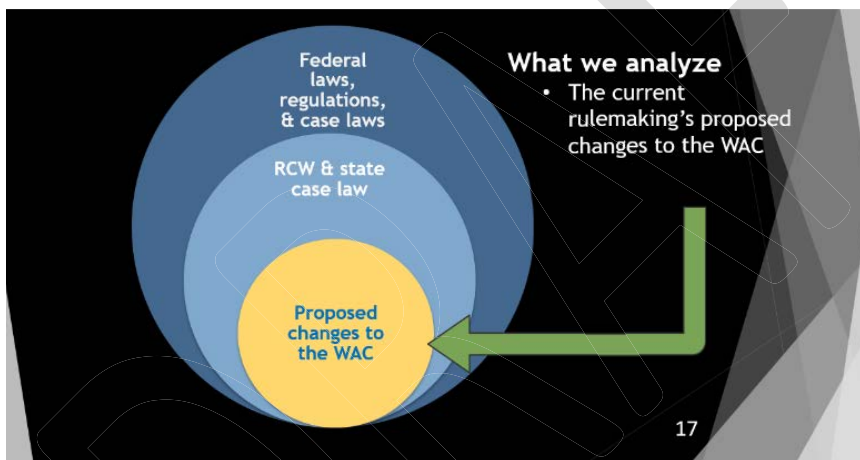
Federal laws and rules: Laws made by federal legislation and rules adopted by federal agencies.

State Laws: Laws passed by the Legislature, which reside in the Revised Code of Washington (RCW).

Rules: Existing rules created through rulemaking by state agencies, which reside in the Washington Administrative Code (WAC).

17. Scope

Allen emphasized that in this graphic, the bigger circles are the baseline.



18. Cost & Benefits of Changes Due to the Rule

The analysis will explore the value of impacts to:

- Cost of doing business
- Environment, wildlife, and habitat
- Human health
- Property
- Risk (oil spills in this case)

APA: Qualitative AND Quantitative

Costs estimates are usually available in quantitative terms, benefits are more likely to include qualitative descriptions.

19. Benefits of Reduced Oil Spill Risk

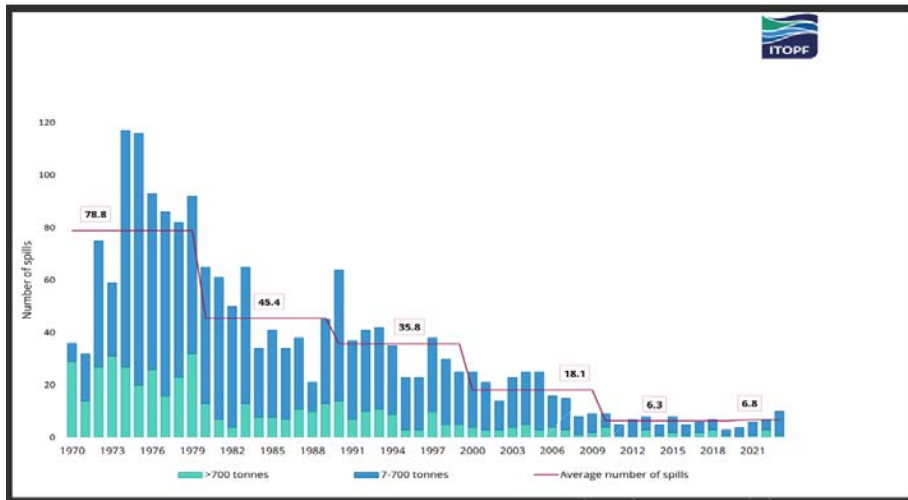
The avoided costs from oil spills include:

- Cleanup
- Environmental damage and studies to assess that damage
- Fishery-related
- Tourism and Recreation related

- Other loss of income
- Other damage to property

20. Declining Oil Spills

Allen then shared one assessment of reduced oil spill incidents over time (internationally).



Source: International Tanker Owners Pollution Federation (ITOPF) Lighter bar (lower) spills of greater than ~5,000 barrels, darker(upper) bar spills 50 to 5,000 barrels.

Average per year: Nearly 80/yr in the 1970's → fewer than 7 /year over the past 20 years.

21. Spills from vessels in US waters

Spills from vessels in U.S. waters have seen a marked reduction. Comparing the 1990s to the 2010s, the amount of oil spilled relative to the amount transported fell 97 percent.

Time Frame	Average Annual Spillage (Barrels)	Average Oil Transported/Year (Million Barrels)	Average Spillage per Million Barrels Oil Transported
Oil in the Sea III (1990-1999)	27,876	2,261	12.33
Oil in the Sea IV (2010-2019)	1,359	3,589	0.38

1. Oil in Sea IV, National Academies.
<https://nap.nationalacademies.org/catalog/26410/oil-in-the-sea-iv-inputs-fates-and-effects>
 Table 3.12, page 87. Metric tons (MT) converted to barrels at a rate of 7.22 barrels/MT.

22. Estimating the Cost of Oil Spills

When estimating the cost of oil spills, Allen explained that they would:

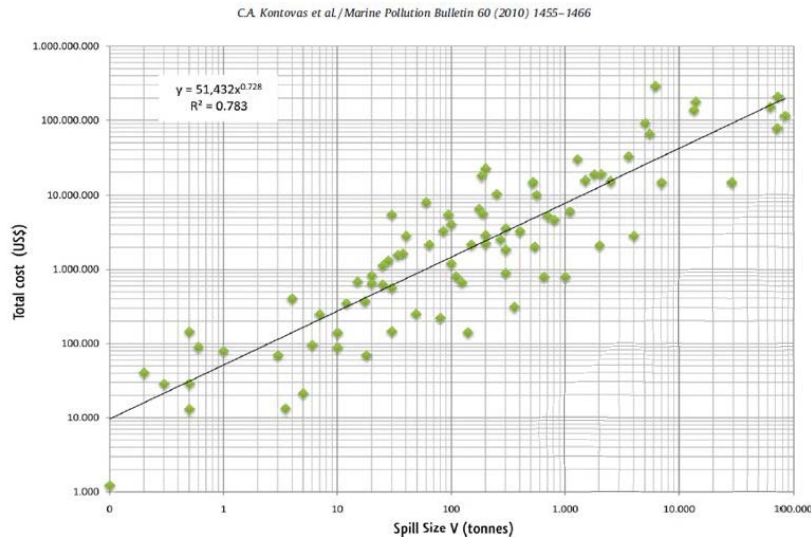
- Add up all relevant cost components (These are often not fully known, e.g. resource damages aren't always assessed.)
- Use modeling approaches based on what costs are known
- Assume that the total cost of an oil spill can be approximated by the compensation eventually paid to claimants. The International Oil Pollution Compensation Fund (IOPCF) publishes Annual Reports.

Source: An empirical analysis of IOPCF oil spill cost data

Christos A. Kontovas , Harilaos N. Psarftis, Nikolaos P. Ventikos

23. Linear Regression of Spill Size and Total Cost

Allen displayed a chart with results based on the claims paid out by the International Oil Pollution Compensation Fund.



It shows the amount paid by the fund in relation to size of the spill. Allen added that it would be nice to have such a concise result for the purposes in this rulemaking. Also, it does not include data from the US or China, nor does it include Natural Resource Damage assessments, and in many cases only includes clean-up costs.

24. Qualitative vs Quantitative Benefits

Methods have improved in estimating the quantitative value of benefits previously described qualitatively.

- Recreation values: qualitative → expenditures → Travel Cost Studies
- Ecosystem service values: qualitative → various valuation methods → \$/Acre per year
- Existence values: qualitative → stated preference value estimation (Willingness to Pay)
- Existence value is a prominent example of non-use value. It does not require that utility be derived from direct use of the resource: the utility comes from simply knowing the resource exists. The idea was first introduced by John V. Krutilla in his essay "Conservation Reconsidered" in 1967. (wiki)

Following *Ohio v Department of the Interior* (1989), US Govt agencies have been able to sue to recover existence values. The Exxon Valdez case was the first to use estimating quantitative damages for restitution.

25. SRKW

Southern Resident Killer Whales were declared endangered on November 18, 2005, by the National Marine Fisheries Service, NOAA, Commerce. That legal status brought resources for their preservation, including funding for studies.

26. Willingness to Pay to Conserve SRKW

Allen then introduced the concept of Willingness to Pay (WTP) to conserve. Via a contingent valuation

survey in 2010, value was established for conservation efforts that would in 50 years move the SRKW from "endangered" to "recovered". Households were willing to pay roughly \$1,000 over 10 years. The study was a "Stated Preference Choice Experiment". Three scenarios were presented to respondents regarding endangered species and their WTP for actions to protect them, and they were asked to choose a scenario they would vote for. This survey was mailed 8 years prior to global headlines about the endangered SR.

This is an indication of the natural resource value of the SRKW. What is analyzed is the impact from proposed changes to the WAC. The proposed changes are unlikely to move the SRKW from endangered to recovered.

Source: Public preferences for endangered species recovery: an examination of geospatial scale and non-market values - Kristy Wallmo and Daniel K. Lew (Frontiers in Marine Science, 2015)

27. Photo from Katmai National Park's "Fat Bear Contest"

Further developments in estimating the existence value of natural resources include Katmai National Park's Annual Fat Bear Contest. A webcam at Brooks Falls allows people to watch bears as they prepare for hibernation exploring the question of whether "getting to know" the animals results in people willing to pay more to protect them.

28. Willingness to Pay for Conservation

There is evidence that being able to identify individual animals increases WTP for conservation. "We were very interested in whether the ability to identify—and identify with—individual animals influences the willingness to pay for conservation. Not surprisingly, the answer is a resounding yes."

-- Lynn Lewis, co-author of: "Getting to know you: individual animals, wildlife webcams, and willingness to pay for brown bear preservation" First published: 15 August 2021

This find has clear implications for the value of the SRKW.

29. J35

Back in 2018, J35 carried her dead calf at the surface for 17 days, garnering national and international headlines. When she later gave birth to a healthy calf, that prompted additional national headlines. Individuals in this group of whales are now known and followed by people. Allen suggested that this could mean a greater WTP now compared to 2010 when households were surveyed about them.

He added the whales are also impacted by vessel noise, which increased escort requirements would add to. These was an example of a one highly valued natural resource potentially impacted by the rulemaking.

30. Information Potentially Sought from Stakeholders

Allen reviewed the information potentially sought from Stakeholders and Tribal Governments:

- Baseline operating costs
- Anticipated costs or benefits to your business or community
- Potential qualitative impacts
- Check of assumptions on costs and benefits
- Critique of the economic modeling structure

He concluded by stating that their analyses are only as good as the data that goes into them.

31. Q&A

Allen then paused for any questions.

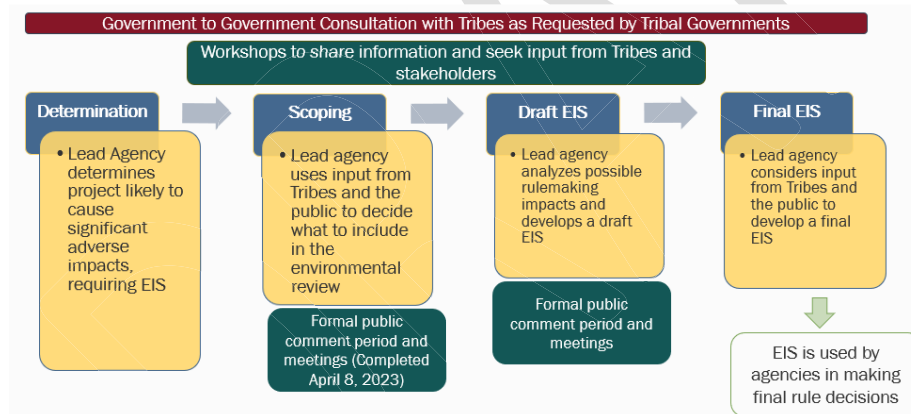
Fred Felleman (Environment/Friends of the Earth) inquired whether the use of the term “cultural resources” included treaty protected resources. Per Fred, impacts to the treaties have direct impacts on salmon and shellfish. The cultural impacts are a superset of treaty rights. While difficult to quantify, it is more significant than just the word cultural. He urged acknowledgment that it doesn’t take much to have a significant impact from a spill, even if it’s not frequent. He wondered how the study would capture the unique nature of the area, not found in other regions. He also urged the focus on all local killer whale populations, not just the SRKWs. Allen thanked Fred and said he would make sure that perspective was incorporated in the way they look at the information for the Economic Analysis.

Jeff Slesinger (Tug Industry/Delphi Maritime) was curious about the data sources for determining operating costs. Allen responded that he looked at the published price sheets. Jeff asked about additional equipment requirements, such as vessels. Per Allen, their understanding was that the 2020 expansion of tug escorts was accommodated within the existing pool of equipment. The proposed additional requirements appear to be relatively small compared to that.

32. Methods for Analysis

Haley then introduced the next topic, which was the methods for analysis.

33. EIS Process



34. Rulemaking and EIS Happen Concurrently

Rulemaking Action	SEPA Action	Proposed Timeline
Rulemaking Announcement (CR-101 filing):	Determination of Significance/ Scoping Comment Period	February 22, 2023
Rule Development Workshops	EIS Development Workshops	March 2023 - December 2024
Rule Proposal and start of comment period (CR-102 Filing)	Issuance of Draft EIS with CR-102 and comment period.	Anticipated Summer 2025
Rule Adoption (CR-103 Filing):	Final EIS issued at least 7 days before the CR-103	Anticipated December 2025
Rule Effective	N/A	Anticipated January 2026 (Typically, 31 days after CR-103 filing)

35. Rulemaking Objective for Use in SEPA

As a reminder, Haley explained that the Econ analysis Allen covered was just one input to the rule

development. The SEPA process, in this case an EIS, is another one. Now she would move on to a discussion of another rule input, the SEPA process. Some of the language (i.e. mitigating impacts) is the same but these processes are distinct inputs to the rule development process.

The rulemaking objective is to reduce the risk for a major oil spill through potential tug escort requirements for the target vessels. The objective is also to design the rules in a way that minimizes underwater noise, focuses vessel traffic into the existing traffic lanes, and minimizes impacts to treaty fishing areas. This language comes directly from the legislation.

36. Goals and Requested Input

Haley explained that for the methods discussion today, there were three primary goals:

- Build public confidence in the analysis that will be conducted
- Seek feedback to shape that analysis
- And identify any areas of concern before the analysis is underway.

She was hoping for feedback on the DRAFT methods summaries, including things like:

- Thoughts on the robustness of the methodology
- Any components that are missing
- Any priorities for the analysis
- And any references or datasets that should be considered.

She then noted that the methods summaries are all still in draft. They are undergoing SME review. This means that there is still flexibility to incorporate feedback. It also means that some of the information presented here today may change before the technical analyses are conducted. She warned that the following slides were dense, but that copies would be provided as a reference. She also asked that questions be held. There is some time built in throughout the presentation for questions and discussion.

37. Contractor Hired

Haley was pleased to announce that Ecology has hired a contractor to assist with the development of the EIS. The primary contractor is a firm called Eastern Research Group (ERG). She explained that they have extensive experience with environmental impact statement development and that they have put together an impressive team of subcontractors including:

- JASCO Applied Sciences, for underwater noise
- Cascadia Research Collective for marine ecology, specifically cetacean impacts
- Triangle Associates for expertise on the Tribal Resources section and
- AS1MET for air quality dispersion modeling.

She added that they may be at future meetings and have contributed some information for these slides.

38. Methods Summaries – Discussion Content

Haley presented the components of the methods that will be covered today:

- Study area: She explained that she would go over this once at the top since the study is largely the same across the elements.
- For each element, proposed research questions will be covered. Haley noted that one thing that can be seen on all the slides is the question of whether the impacts can be reduced or mitigated, which is a piece of the SEPA process that hasn't been discussed in as much detail yet in the workshops.

- She planned to also cover a summary of the proposed approach, a short list of primary references, and discuss the impact indicators being considered.
- And she'll be sharing some of the relevant comments received during scoping and at the last workshop.

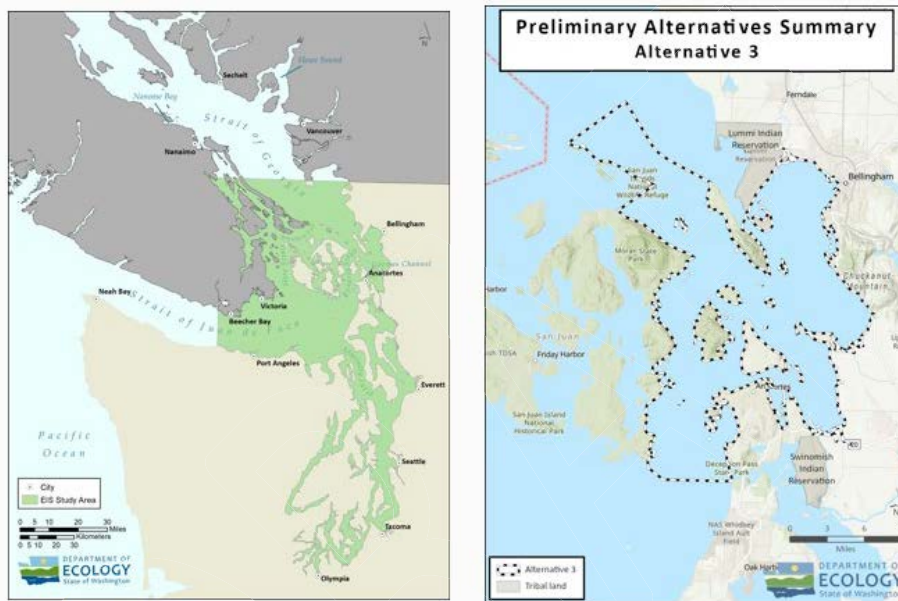
Haley would not be covering all the elements today as some of these summaries are still in development (plants and animals, and water quality). She would focus on the priority elements first.

39. Available to You

Haley reminded the group that if the presentation felt not technical enough or too technical, to please reach out to set up a 1-1 meeting to discuss in more detail.

40. Study Area

Haley presented the primary study areas for the EIS:



The map on the left, which is called the “EIS Study Area” includes the commute routes from tugs traveling to or from an escort job, as well as the area where escort requirements could change. And on the right, the preliminary alternatives, where the rule could change escort requirements. This is a map of Alternative 3, which is the expansion option here.

41. Vessel Traffic: Research Questions

For vessel traffic, the research questions are:

- What are the existing levels of vessel traffic, and specifically escort tug traffic, in the study area?
- How do the proposed changes in requirements (the alternatives) change escort tug traffic?
- And what other types of vessel traffic are potentially affected by the proposed changes?
Where do those impacts occur?

The research questions generally follow this structure: what is the baseline? What are the changes under the proposed alternatives? And what is the impact?

42. Vessel Traffic (Priority Element)

Some of the comments received on this element were to consider the impact of additional escort tugs on navigational safety, to understand WHERE the additional traffic will be, and how it potentially

interacts with other vessel types. They also heard that the team needs to differentiate between tugs escorting vs. commuting, as well as some comments about the complex nature of tug scheduling.

Component	Summary Description
Methodology Overview	<ul style="list-style-type: none"> Develop quantitative baseline: existing traffic for target vessels, # of escort jobs/year, # of commute transits/year, underway time Model changes to baseline for alternatives, develop heat maps Assess areas of potential impact from changes in vessel traffic
Primary Data Sources and References	<ul style="list-style-type: none"> Ecology Risk Model, associated analyses and reports, 2023 Tug Escort Report 2021 Synopsis of Changing Vessel Traffic Trends 2019 Report of Vessel traffic and Vessel Traffic Safety VEAT Reports USCG Incident Reports 2016 PAWSA 2010, 2015 VTRAS, Columbia River VTRA AIS Data
Impact Indicators	<ul style="list-style-type: none"> Changes in underway time Interactions with other vessel traffic

43. Oil Pollution: Research Questions

For oil pollution, another priority topic, these are the research questions:

- How much oil is transported by vessels and where is it in relation to traffic? What does historical data tell us about incidents that lead to a spill? Existing the risk from target vessels and from escort tugs?
- How do the proposed changes affect the RELATIVE FREQUENCY of spill incidents for target vessels and tug escorts?
- How do the proposed changes affect the LOCATION AND AREA of impact of spill incidents for target vessels and tug escorts?
- Can the impacts be reduced or mitigated?

44. Oil Pollution (Priority Element)

Some of the comments received on this element were to consider both spill risk reduction from having tug escorts as well as risk increases related to increased operations of escort tugs. Also, to consider spill trajectory maps and to include improvements to oil spill prevention made by industry and the agencies.

Component	Summary Description
Methodology Overview	<ul style="list-style-type: none"> Establish Baseline: Overview of current trends in oil movement incl. types and volumes of oil, spill response options and limitations, existing safety measures to reduce risk. <ul style="list-style-type: none"> Target Vessels: Simulated drift grounding frequency, review of 2020-2023 incidents Escort Tugs: Simulated hazard incident frequency, review of 2020-2023 incidents, information on spill sizes and locations. Assess Alternatives: Model changes from baseline for specified metric, discuss incident data under each alternative. Discuss impacts of a spill on resources of concern
Primary Data Sources and References	<ul style="list-style-type: none"> Ecology Risk Model and associated analyses and reports VEAT Reports Ecology Resources at Risk data, GRPs, PNW ERMA, other NOAA tools
Impact Indicators	<ul style="list-style-type: none"> Target Vessels: frequency of drift groundings Escort Tugs: hazard frequency (collisions, allisions, loss of propulsion) Escort Tugs: other spill types

45. Priority Elements Discussion 1

Fred Felleman (Environment/Friends of the Earth) wondered if the role of the tug to prevent the spill as well as the impact of putting an additional tug on the water would be included? Haley responded that yes, that is how they are thinking about structuring it now. Fred then suggested the way the model was structured and used, looking at the value of the added tug to the entire waterway, was erroneous to the reason for the added escort. He would suggest the congestion and other downsides should also be

looked at. He added that there were some discussions of tug of opportunity value, beyond the target vessels. He wondered whether the modeling would include projections of future traffic and the role the tug would play to address non-target vessels. Haley responded starting with his last question regarding other projects and the safety measures that are either going into operation now or will in the future. Per Haley, the report will include cumulative effects and impacts chapter looking out at those other projects, like Trans Mountain and other factors like tugs of opportunity. They are still looking at other methods. She said it was a good point and assured that they plan to look at those in the cumulative effects chapter. Fred countered that there are also cumulative benefits of having additional tug availability for the additional traffic. He urged that the cumulative analysis needed to include the cumulative benefit impacts on safety. Haley thanked him for that comment. His other question was regarding NOAA's trajectory analysis. He said the oil spill will not be restricted to the study area. It will go out the strait. He wondered if the analysis was going to be limited to the study area or the full impact of the spill. Haley responded that the area would include Port Angeles as well as the border. Not just the study area.

Blair Bouma (Pilot/Puget Sound Pilot) said that because parts of the bill were implanted at the beginning, there was real time data to utilize. He wondered if there was a way to use the current traffic as opposed to hypotheticals. Haley responded that it was something that the team was considering. One of the benefits of the model is it allows equal analysis of all the alternatives, providing apples to apples comparisons. She added that his question was a good one.

Jeff Slesinger (Tug Industry/Delphi Maritime) clarified that the calculation of the frequency of drift groundings was relying on the model to which Haley agreed. His question was how will the study balance the predicted frequencies that come from the model with the real data available now? Jeff suggested that there was some bias in the model because it included data from other areas. He wondered how the gap would be handled. Haley said that they plan to look at the analysis in the 2019 report that looked at the actual history of incidents in the area and whether tug escorts would have helped in those instances. Adam Byrd (Ecology Alternate/BPC) clarified that the model did use local data for drift grounding, using local info for loss of propulsion events. It did not use outside inputs. Fred added that he supported Blair and Jeff's comments. Blair clarified that he didn't expect the last 4 years of data to impact the risk modeling. More that it could provide data regarding environmental impacts, traffic, etc.

46. Underwater Noise/Noise: Research Questions

For underwater noise these are the research questions:

- What is the current underwater baseline noise level from vessel traffic and escort tug traffic in the study area?
 - Do current vessel underwater noise emissions potentially impact sensitive marine wildlife receptors?
- How would the proposed changes in tug escort requirements, including from commutes and idling time, affect the quantity and spatial distribution of these emissions and their impacts to sensitive receptors?
 - Can these impacts be reduced or mitigated?
- Would changes in vessel activities be expected to result in new/worse operational noise impacts near sensitive receptors?

47. Underwaters Noise/Noise (Priority Element)

Some of the comments received on this element were support for robust analysis of this topic, particularly impacts to SRKWs, and to consider above water noise such as sound signals and maintenance as well as challenges of mitigation.

Component	Summary Description
Methodology Overview	<ul style="list-style-type: none"> Identify areas of concern to be focus of underwater noise modeling – e.g., sensitive habitats such as SRKW and grey whale foraging areas Conduct sound propagation modeling of vessel underwater radiated noise in areas of concern under different regulatory scenarios; compare results against effects criteria for various marine wildlife species Qualitatively assess potential for changes in operational noise levels (e.g., during idling) to exceed ambient noise criteria in areas with sensitive receptors
Primary Data Sources and References	<ul style="list-style-type: none"> Vessel traffic data from Ecology Risk Model Vessel source levels from JASCO's large database recorded through the ECHO Program in the Strait of Georgia, Haro Strait, and Boundary Pass SRKW key habitat and foraging areas Environmental model inputs: i.e., wind, bathymetry, sound speed profiles, geoacoustics
Impact Indicators	<ul style="list-style-type: none"> NOAA/NMFS behavioral effects from noise criteria Killer whale communication/echolocation frequency bands; reduction in listening space

48. Air Quality: Research Questions

For underwater noise these are the research questions:

- What are current emissions (criteria, air toxics, and GHGs) from vessel traffic and escort tug traffic in the study area?
- Do current vessel emissions (criteria, air toxics) potentially impact overburdened and sensitive receptors identified in the EJ analysis, including Tribal reservations?
- How would the proposed changes in tug escort requirements, including from commutes and idling time, affect the quantity and spatial distribution of these emissions and their impacts to sensitive receptors?
 - Can these impacts be reduced or mitigated?
- Would the changes in emissions be consistent with State and industry emission reduction goals?

49. Air Quality (Priority Element)

Some of the comments received were whether this was a significant impact, air quality issues for overburdened communities, and public health concerns. The team also heard comments to consider state and industry targets for air emissions. And, they got some good information about existing air quality monitoring gaps.

Component	Summary Description
Methodology Overview	<ul style="list-style-type: none"> Identify areas of concern to be focus of dispersion modeling – e.g., areas with elevated vessel activity close to many sensitive receptors Quantify emission rates (criteria, air toxics, GHGs) for each alternative; compare against state and industry goals; provide emission rate inputs to dispersion modeling Conduct dispersion modeling (criteria, air toxics) using AERMOD-COARE for areas of concern under each regulatory scenario; compare results against air quality standards
Primary Data Sources and References	<ul style="list-style-type: none"> Vessel traffic data from Ecology Risk Model 2022 National Emission Inventory Modeling Platform COARE meteorological data U.S. EPA Guideline on Air Quality Model
Impact Indicators	<ul style="list-style-type: none"> U.S. EPA National Ambient Air Quality Standards (NAAQS) Air toxics thresholds Federal Air Rules for Reservations (FARR) air quality standards (40 CFR Part 49) Washington and Northwest Sea Port Alliance emissions reduction goals

50. Tribal Resources: Research Questions

For underwater noise these are the research questions:

- Hear from Tribes what Tribal resources of interest/concern in the study area?
- How and where does current baseline vessel traffic impact Tribal resources and interests (e.g., restricted access, availability of fishery species, gear loss, physical safety)?

- What aspects of vessel traffic are key causes of these impacts (e.g., congestion, wakes, speed, noise, emissions, discharges)?
- How would the proposed changes in tug escort requirements affect vessel traffic impacts to Tribal resources and interests? Can these impacts be reduced or mitigated?

51. Tribal Resources (Priority Element)

Some of the comments received were about treaty fishing and vessel interaction, info about tug activity and wakes affecting tribal fishers, and the need to understand both special and temporal distribution of traffic in order to really understand the impacts. The team will be looking to tribal staff to help shape this analysis as well as reviewing published materials by tribes about impacts of vessel traffic.

Component	Summary Description
Methodology Overview	<ul style="list-style-type: none"> • Identify Tribal resources of interest in the study area in coordination with Tribal staff • Characterize impacts, and causes of impacts from current vessel traffic • Review vessel traffic analysis outputs and identify areas of interest with increased (or decreased) potential for vessel-related impacts • Coordinate with Tribes and/or DAHP to discuss concerns and ways to reduce/mitigate impact if possible and appropriate.
Primary Data Sources and References	<ul style="list-style-type: none"> • Input from THPOs, Tribal Natural Resources Directors, and Staff from interested Tribes • Previous published statements and reports, including 2016 PAWSA, SRKW Task Force, Shared Waters Forum, Cherry Point EIS, TMX/RBT2 environmental documents, etc. • Washington Information System for Architectural & Archaeological Records Data (WISAARD) • Bureau of Indian Affairs (BIA) Tribal trust land maps
Impact Indicators	<ul style="list-style-type: none"> • TBD based on impacts identified in methods steps 1 and 2 • Could include: relative frequency of incidents involving escort tugs, disproportionate impacts to Tribes as a result of the proposed rule, impacts to access, changes in spill risk, etc.

52. Environmental Justice: Research Questions

For Environmental Justice, these are the research questions:

- What communities of color, low-income populations, and/or overburdened communities are present within the study area?
 - (Compare to reference community and identify “environmental justice population” block groups.)
- What are potentially significant adverse impacts (that can’t be mitigated) of the proposed changes in tug escort requirements?
- How would potentially significant adverse impacts affect environmental justice populations?

53. Environmental Justice

Some of the comments received were in support of a robust assessment, concern that the state’s environmental health disparities map doesn’t include priority for tribes, and comments about environmental justice impacts to tribes and tribal lands. Ecology’s Office of Equity and Environmental Justice has provided a recommended methodology and is advising on this process.

Component	Summary Description
Methodology Overview	<ul style="list-style-type: none"> • Identify communities of color, low-income populations, and overburdened communities within the study area and compare to population characteristics of reference community • Overlay impacts that can’t be mitigated with location of EJ communities to determine type and severity of impacts on affected populations.
Primary Data Sources and References	<ul style="list-style-type: none"> • U.S. Census Bureau 2018-2022 American Community Survey • OSPI Data on language spoken by students • U.S. EJSCREEN Tool • WA Environmental Health Disparities Map (secondary) • OFM/Ecology Dataset on Overburdened Communities of WA • Guidance Documents from CEQ, EPA, ECY, and WA State Agencies
Impact Indicators	<ul style="list-style-type: none"> • Disproportionate impacts to EJ communities as a result of the proposed rule

54. Priority Elements Discussion

Fred Felleman (Environmental/Friends of the Earth) appreciated the information but wondered what it meant for people who were marine dependent have their resources removed, beyond tribes. Fred wanted to know how the data would be sectioned out. Haley responded that SEPA is focused on significant adverse impacts to the environment. The SEPA process will not talk about the about positive impacts. There were other places for that information within the rule development process. For example, SEPA will not be talking about the benefits of tug escorts on tribes during this process. She gave another example that if the analysis showed that there was a reduction in the risk of oil spills, SEPA would conclude that there was no significant adverse impact to that element. It's not going to enumerate the benefits. That is not how the process is structured. Fred asked when that consideration would happen in the rulemaking process. Haley said that all the information that has been presented to the OTSC, the reports, the slides, etc., are being considered outside of the report called the EIS. Sara Thompson (Ecology Alternate/BPC) added that the three alternatives were based on the benefits that they bring to the table. Brian Kirk (Ecology Alternate/BPC) added a comment in the chat that the economic analysis would look at the costs and benefits. Fred argued that it wasn't just financial. Blair Bouma (Pilot/Puget Sound Pilots) responded that SEPA wasn't the whole process, just a part. The economic analysis was another part. Ultimately, the group will use all the parts to consider the benefits. SEPA is supposed to look at consequences. Fred responded that he was perfectly aware of SEPA and MEPA. Jaimie Bever (OTSC Chair/BPC) suggested that for the sake of time they move on and continue the conversation offline.

55. Recreation: Research Questions

For Recreation, these are the research questions:

- What are current recreational uses in the study area?
- How do the proposed changes in tug escort requirements affect recreational opportunity and access (frequency, duration, spatial conflicts) and quality (safety, enjoyment)?
- How would recreational uses be affected by changes in oil spill risk under the proposed alternatives?
- Can impacts be reduced or mitigated?

56. Recreation

Some of the comments received were to include recreational fishing throughout the waterway not just the coast lines.

Component	Summary Description
Methodology Overview	<ul style="list-style-type: none">• Compile available data about existing recreation in the study area• Assess each activity for possible impacts from changes in tug escort requirements• Cross-reference with other chapters as relevant
Primary Data Sources and References	<ul style="list-style-type: none">• State Data: RCO Outdoor Recreation Inventory, WDFW rec harvest, sports catch, and fishing license data, WSDOT Scenic Byways information, DOL boating licenses• County Data: SMPs, other plans, studies (incl. Tourism studies), ordinances• SJI National Monument plans and information• Geographic Response Plans for the region• Soundwatch whale watching vessel movement info• Data on recreational gear loss in the Puget Sound
Impact Thresholds	<ul style="list-style-type: none">• Changes to access to or quality of recreational opportunities

57. Visual Resources: Research Questions

For Visual Resources, these are the research questions:

- What are the existing visual resources and visual character of the study area?
- How do the proposed changes in tug escort requirements affect visual resources?

- Where are visual impacts likely to be concentrated?
- Can impacts be reduced or mitigated?

58. Visual Resources

Some of the comments received were to look at geographic distribution of light and glare complaints and to look at anchorage areas, in particular. At the last workshop, there was a good discussion regarding scale of tugs and light requirements while moving and anchoring. Most light complaints were from larger vessels and not from escort tugs.

Component	Summary Description
Methodology Overview	<ul style="list-style-type: none"> • Using the FHWA Visual Impact Assessment (VIA) Methodology, assess the level of VIA required (likely a memorandum or abbreviated VIA). • Conduct the appropriate VIA Assessment. This will include identification of existing visual character and resources, a site visit, review of relevant plans, discussions with relevant stakeholders and potentially affected Tribes, and a qualitative assessment of impacts.
Primary Data Sources and References	<ul style="list-style-type: none"> • Local land use management plans, policies, ordinances • FHWA/WSDOT Guidance on VIA Methods • Puget Sound Harbor Safety Standards of Care • AIS and GIS data
Impact Indicators	<ul style="list-style-type: none"> • Changes in visual quality as a result of the proposed rule changes

59. Energy & Natural Resources: Research Questions

For Visual Resources, these are the research questions:

- What is the current level of marine fuel use in Washington State?
- How do the proposed changes in tug escort requirements affect fuel needs?
- How do changes in fuel needs affect availability of fuel sources as the state and regional level?
- Can impacts be reduced or mitigated?

60. Energy and Natural Resources

Some of the comments received were that while there was some increase with the 2020 rule, there was not a significant change. There are changing trends in fuel transportation in Puget Sound. Consider transition to alternative fuels or electric tugs. This will likely to be in addressed in a mitigation section which will also consider feasibility and technological readiness.

Component	Summary Description
Methodology Overview	<ul style="list-style-type: none"> • Establish estimated baseline of fuel requirements • Based on vessel traffic analysis, estimate changes in fuel use for each alternative • Compare to statewide and regional fuel use and availability
Primary Data Sources and References	<ul style="list-style-type: none"> • U.S. Energy Information Administration (WA and PADD 5) • Ecology SPIIS Data • AIS Data
Impact Indicators	<ul style="list-style-type: none"> • Change in fuel use as a result of the proposed rule

61. Other Elements Discussion

Fred Felleman (Environment/Friends of the Earth) wondered if the team was looking at real estate values. He mentioned that Friends of the San Juans did a report on visual impacts and benefits. Haley responded that they would pass that on to Allen for economic impacts and that visual character would be included.

Jeff Slesinger (Tug Industry/Delphi Maritime) suggested passing on to the economic team a recommendation to expand to include alternative fuel systems and the building of those tugs. The other piece was that while there may be adequate-sized tugs in the area, there were not enough of them.

There was a shortage and subsequent delays. Also, look at backend and operational costs. Fred suggested that the last four years could provide some of that data. Jeff then expressed his appreciation for the team acknowledging the complexity of the work involved.

Rein Attemann (Environment Alternate/WEC) wanted to revisit air quality and emissions. He suggested including surface water exhaust fumes that could impact SRKWs as they come up to breath. He will look for some resources to share.

62. Timeline and DEIS Development Process

63. DEIS Milestones and Next Steps

Milestone	TENTATIVE Timeline	Input Opportunity
Methods Development	June - Aug. 2024	This workshop, 1-1 meetings, submit informal comments
Workshop Series #9	Sept. 2024	Comments, updates on preliminary oil spill risk, vessel traffic analyses
Technical Analyses	July - Dec. 2024	Submit informal comments, 1-1 meetings
Deep Dive Workshop (Noise?)	Oct. 2024	Comments, updates on underwater noise work
Workshop Series #10	Nov. 2024	Comments, early review of technical analyses
Workshop Series #11	Jan. 2025	Comments on proposed rule language, preliminary econ update
Early Review Sections of Preliminary Draft EIS	Late spring/early summer 2024	Possible early review for OTSC and Tribes
DEIS/CR-102 Comment Period	Summer 2025	Formal comments, public hearings

64. Online Comment Submission

Online comments can be submitted at <https://sppr.ecology.commentinput.com/?id=x27tZ4iRfs>. The informal comment period is open until the end of the rule development phase.

The benefits of online comments include:

- Transparency, accessibility, and an online record
- Easier tracking of comments
- Encouraging broader participation in the rulemaking process

65. Upcoming Workshops

Jaimie reviewed the schedule for the next two workshops series:

- Workshop #9 - Proposed
 - Stakeholders: September 3, 2024 (1:00pm-3:00pm)
 - Tribal Governments: September 10, 2024 (10:00am-12:00pm)
 - OTSC: September 12, 2024 (10:00am-12:00pm)
- Workshop #10
 - Stakeholders: November 5, 2024 (10:00am-12:00pm), HYBRID @ NWRO
 - Tribal Governments: November 13, 2024 (1:00pm-3:00pm)
 - OTSC: November 14, 2024 (10:00am-12:00pm)

66. Final Questions or Comments

Fred Felleman (Environment/Friends of the Earth) said the comments made regarding surface impacts

on the whales regarding vessel traffic and air emissions were very pertinent to whale watching boats but not to the relevant vessels for this rulemaking. He urged considering exposure and duration. He believes they are de minimus.

DRAFT