



## Final Rule for Electronic Submission of Mariner Course Completion Data and Changes to Endorsement Titles

The Coast Guard has issued a final rule requiring Coast Guard approved training providers to electronically submit student course completion data to the Coast Guard within 5 business days of completion. Training providers have until January 17, 2027, to develop administrative procedures to comply with this final rule. The National Maritime Center will use this information to validate course completion information submitted as part of an application for a Merchant Mariner Credential (MMC).

Under current processes, a Homeport account is required to electronically submit course completion data to the Coast Guard. Information on registering for a Homeport account can be found [here](#).

Additionally, this final rule updates gendered titles for certain officer and rating endorsements in keeping with the Coast Guard policy of using gender-neutral language wherever possible. Changes to the following endorsement titles are described in the table below:

<b>Current Endorsement Title</b>	<b>Updated Title</b>
Apprentice mate (steersman)	Apprentice Mate of Towing Vessels
Crewman	Crewmember
Fireman	Boiler Technician
Hospital corpsman	Medical Technician
Lifeboatman	Lifeboat Operator Lifeboat Operator-Limited
Pumpman	Pump Technician
Seaman	Seafarer Able Seafarer-Unlimited Able Seafarer-Limited Able Seafarer-Special Able Seafarer-Offshore Supply Vessel Able Seafarer-Sail Able Seafarer-Fishing Industry
Tankerman	Tank Vessel-PIC Tank Barge-PIC Restricted Tank Vessel-PIC Restricted Tank Barge-PIC Tank Vessel-Assistant Tank Vessel-Engineer

# United States Coast Guard

## Merchant Mariner Credentialing Program



Starting on January 17, 2025, the Coast Guard will no longer issue endorsements using the current endorsement titles. MMC endorsement titles will be updated for all credentials printed on and after this date.

For approved maritime training providers these changes are not considered significant in accordance with 46CFR 10.403(a)(7). Training providers may begin making changes to their approved curricula and recording them in the required record of change for each course or program. When making these changes, training providers are cautioned to review the impact on all aspects of the curriculum including quizzes, student guides, practical assessments, and examinations. If these changes result in a change to the Course Completion Certificate, training providers **must** submit a modification request with an updated sample to [NMCCourses@uscg.mil](mailto:NMCCourses@uscg.mil) to ensure continuity of the credentialing process. Course and program requests submitted to the National Maritime Center prior to the implementation date of this rule will be evaluated as submitted. Requests submitted on or after the implementation date of this rule will be evaluated using the updated gender-neutral titles.

For more information, the Final Rule is available on the Federal Register [here](#) or search on [www.regulations.gov](http://www.regulations.gov) under Docket Number USCG-2021-0097.

Sincerely,

/M. Medina/

Mayte Medina  
Chief, Office of Merchant Mariner Credentialing

5050  
19 Dec 2024

## MEMORANDUM

From: Michelle I. Rosenberg  
NAVCEN

To: Mark McDonnell  
CG SECTOR Puget Sound

Thru: Evelyn B. Samms  
COMDT (CG-INV)

Subj: BOARD OF INQUIRY (BOI) PUGET SOUND PORT VISIT REPORT

1. **Purpose.** On March 26, 2024, the *M/V DALI*, a 984 foot-long Singapore flagged cargo vessel, reportedly lost electrical power while departing the Port of Baltimore and allided with the Francis Scott Key Bridge. At the time of the allision, the *M/V DALI* was loaded with approximately 4,680 containers. The allision resulted in the death of six individuals, the bridge collapsing, and closure of the waterway for an extended period. Following this devastating incident, the Coast Guard Deputy Commandant for Operations issued a convening order to establish a Board of Inquiry to –

*...evaluate the risks to critical port infrastructure due to larger commercial vessels and increased traffic density over recent decades...and prepare a holistic risk assessment for each of the ten ports with supporting recommendations for port-specific risk mitigation measures and best practices for navigation safety, critical infrastructure, commercial shipping, waterways management, and environmental protection.*

2. **Port Visit Overview.** The Board of Inquiry conducted a port visit in Puget Sound, WA from September 17, 2024, to September 19, 2024. The Puget Sound BOI port visit team was comprised of the following members:

Name	Unit	BOI Puget Sound Port Visit Role
CDR Michelle Rosenberg	CG Navigation Center	Team Lead
CDR Corydon Heard	CG Traveling Marine Inspector Staff (CG-5P-TI)	Team Member
LCDR David Bourbeau	Waterways Policies & Activities Division (CG-WWM-1)	Team Member
Mr. Nick Neely (CDR ret.)	Waterways Mobility Division (CG-WWM-3)	Team Member

In addition, 30 participants representing the range of waterway users and stakeholders joined together with federal, state, and local safety authorities to collaboratively identify and discuss the risks and mitigations to maritime related critical infrastructure within a pre-defined study area in the vicinity of Seattle and Tacoma, WA. Enclosure (1) provides a graphic of the Puget Sound BOI port visit study area.

3. **Port Visit Overview.** The port visit was held over three days. Below is a summary of what was accomplished each day and a summary of the results:

- a. Port Visit Day 1. On the first day, the BOI team met and conducted a Command in-brief with the Sector Puget Sound Commander, Deputy Sector Commander, Prevention Department Head, Waterways Management Division Chief, and District 13 Prevention Division Chief. The meeting consisted of a discussion to introduce the BOI team and their roles, visit objectives, confirm logistics, answer questions, and identify any initial port concerns.
- b. Port Visit Day 2. On the second day, the BOI team facilitated participant discussion to systematically identify and rank port specific critical infrastructure within the Puget Sound study area. This information was used to guide the identification of risks, debilitating consequences, and potential mitigations for the top ranked port specific critical infrastructure.
- c. Port Visit Day 3. On the last day, the BOI team facilitated a discussion with local tribal representatives to identify the types of critical infrastructure that pose a risk to Washington Tribal Usual and Accustomed (U&A) fishing areas and Treaty Rights. At the conclusion of the tribal engagement, the BOI team conducted a Command out brief to summarize the results of the visit and to solicit feedback and provide expectations for post-BOI port visit deliverables.

4. **Port Visit Initial Findings.** The following section provides initial findings from the Puget Sound BOI Port Visit.

- a. Top 5 Stakeholder Identified Critical Infrastructure. Through an anonymous multi-voting process, the following infrastructure were identified and ranked as most critical within the study area.

Stakeholder Ranking	Critical Infrastructure		Port Specific Critical Infrastructure
	Category	Type	
1	Navigation Infrastructure	Channel	East Duwamish Waterway
2	Navigation Infrastructure	Channel	Blair Waterway
3	Navigation Infrastructure	Deepwater Channel	Elliot Bay
4	Multi – Modal	Bridge	BNSF Railroad, Ballard Bridge
5	Commercial Maritime Facility	Cargo Terminal	SSA, Terminal-5

Table 1. Top 5 ranked stakeholder critical infrastructure

- b. Top 2 Stakeholder Identified Critical Infrastructure by Category. Through an anonymous multi-voting process, the following pieces of infrastructure were identified and ranked as the top two pieces of infrastructure for each of the five critical infrastructure categories.

Stakeholder Ranking	Critical Infrastructure		Port Specific Critical Infrastructure
	Category	Type	
1	Commercial Maritime Facility	Cargo Terminals	Husky Terminal
2	Commercial Maritime Facility	Cargo Terminals	Alaska Marine Lines
1	Multi-Modal	Bridge	BNSF Railroad, Ballard Bridge
2	Multi-Modal	Bridge	Interstate-5 Bridge (Ship Canal)
1	Navigation Infrastructure	Deepwater Channel	Elliot Bay
2	Navigation Infrastructure	Deepwater Channel	East Duwamish Waterway

Table 2. Top 2 ranked stakeholder critical infrastructure by category. Note that no piece of critical infrastructure was identified for the Maritime Support Infrastructure category.

- c. Identified Debilitating Consequences and Mitigations. Due to time constraints, stakeholders were only able to discuss worst case scenarios and identify debilitating consequences and mitigations for four pieces of identified critical infrastructure. The synopsis from these discussions is outlined in Table 3. For the two channels identified as most critical, the worst-case scenarios, consequences, and mitigations were agreed to be the same with very minor nuances. Therefore, East Duwamish Waterway in Seattle and the Blair Waterway in Tacoma share the same concerns.

Stakeholder Ranking	Critical Infrastructure		Port Specific Critical Infrastructure
	Category	Type	
1 & 2	Navigation Infrastructure	Channels	East Duwamish Waterway and the Blair Waterway <sup>1</sup>
<b>Worst Case Scenario Incidents</b>		<p><b>Crane Allision:</b> An underway large container ship allision with a gantry crane in the down position that causes neighboring gantry cranes to topple or fall into the waterway. The allision results in loss of life to the crane operator, a puncture of the vessels fuel oil tanks, and causes a blockage in the waterway.</p> <p><b>Grounding or Collision:</b> Grounding or collision of large vessels that results in a fire to cargoes containing lithium-ion batteries and major pollution event leading to long-term closure of the waterway.</p>	
<b>Debilitating Consequences</b>		<p><b>Crane allision:</b> Injury and/or loss of life. Magnitude and potential for safety consequences increase if subsequent cranes or docking areas in the vicinity are impacted. Adverse economic impact to local and regional areas. Potential for cascading national impacts due to reliance of material goods produced for other industries (i.e.,</p>	

<sup>1</sup> The East Duwamish waterway is in Seattle and the Blair waterway is in Tacoma. Both waterways are highly industrialized and narrow channels. Due to these similarities in risk profiles their summaries were combined.

	<p>electronics, technology, aerospace industry). Replacement of a gantry crane costs approximately \$10 million and takes a minimum of 18 months lead time. Significant oil discharge resulting in extended waterway closure to facilitate cleanup efforts and assess extent of environmental impact.</p> <p><b>Grounding or Collision:</b> Similar safety, economic, and environmental consequences as a crane allision. Heightened injury and/or loss of life consequences due to limited local knowledge, training, and resources for marine firefighting. Increased complexity and response cost due to potential vessel removal and/or salvage. Potential for prolonged waterway closure due to fire, oil spill, and vessel salvage response efforts.</p>		
<b>Mitigations</b>	<p><b>Crane Allision:</b> Existing non-regulatory enforceable voluntary safety standards and best practices to mitigate risk of allision. Vessel pilots request for facility operators to raise cranes when concerns exist regarding vessel clearance. Vessel pilots have received feedback from some facility operators that raising cranes is sometimes an unwarranted inconvenience. Proposed implementation of a mandatory measure to require facilities to raise a crane if a vessel meets a specified height or tonnage.</p> <p><b>Grounding or Collision:</b> Enhanced communication between commercial vessel operators and recreational waterway users to reduce situations where large vessels may need to use evasive maneuvers within channels. Continued investment to modernize Vessel Traffic Service technology and capabilities to prevent collision of large vessels. Increased salvage, oil spill response organizations (OSROs), and general vessel response plan (VRP) contractors available to quickly respond to a large-scale incident and reduce severity and likelihood of long-term port closure.</p>		
<b>3</b>	<b>Navigation Infrastructure</b>	<b>Deepwater Channel</b>	<b>Elliot Bay</b>
<b>Worst Case Scenario Incident</b>	<p>A high-capacity passenger ferry collision with a barge carrying oil or hazmat that causes a major spill in Elliot Bay and results in a mass casualty event.</p>		
<b>Debilitating Consequences</b>	<p>Mass casualty event with possible impeded response due to presence of an oil or hazmat spill. Location of incident may require marine traffic re-routing to support immediate and robust pollution response efforts. Significant negative impacts to island community residents reliant on passenger vessel services due to long-term changes in vessel routing. Potential commercial shipping delays for the Port of Seattle. Adverse regional economic impact with potential for cascading national impacts due to reliance of material goods produced for other industries (i.e., electronics, technology, aerospace industry). Threatened habitat for endangered Southern Resident</p>		

		Killer Whales and Usual and Accustomed (U&A) fishing grounds for tribal nations.	
<b>Mitigations</b>		Investment in the modernization of Vessel Traffic Service technology and capabilities to prevent collision of large vessels. Although large commercial vessel traffic density is decreasing, commercial vessel size and recreational boaters within traffic lanes are increasing. Establish consistent training and exercise regimen for an on-water mass casualty or mass evacuation event. Ensure robust network of salvage, OSROs, and general VRP contractors available to respond to a large-scale incident to mitigate severity and long-term impacts.	
4	<b>Navigation Infrastructure</b>	<b>Multi-Modal</b>	<b>BNSF Railroad Bridge, “Ballard Bridge”</b>
<b>Worst Case Scenario Incidents</b>		Vessel allision with the bridge while a train carrying passengers or flammable and combustible hazardous materials transiting that causes derailment, subsequent explosion, loss of life, and pollution discharge into the marine environment.	
<b>Debilitating Consequences</b>		Economic loss locally and regionally. The bridge is a main artery for BNSF rail routes to Canada. Alternative routes exist for cargo trains, but re-routing would cause significant delays and stress on other rail lines. Long-term closure of Lake Washington Ship Canal to through traffic due to blockage caused by bridge and vessel debris. Significant environmental impact if tank car is breached and fully discharges into waterway.	
<b>Mitigations</b>		Bridge replacement or renewal and reinforcement of existing fendering system. Increased funding for maintenance to reduce likelihood of bridge getting stuck in down position. Increased bridge inspections. Improved communication protocols between bridge operators and vessel operators.	

Table 3. Debilitating Consequences and Mitigations

5. **Tribal Engagement.** A targeted discussion with local tribal representatives was offered to identify and document concerns regarding the risk to treaty rights from larger commercial vessel traffic and port critical infrastructure. Three tribes participated, Muckleshoot, Suquamish, and Nooksack. Due to the size of the audience and scope of the discussion, a modified methodology was used to facilitate this engagement.

- a. **Multi-Modal:** Boat ramps and marinas are the main risk to treaty rights in the “Multi-Modal” critical infrastructure category. Increased recreational vessel traffic causes congestion and hinders the ability for tribes to both haul and leave nets unattended. The Rules of Tribal Fisheries govern the placement of nets. These regulations are not publicly releasable and are enforced by tribal officials. Per these rules, tribal fishing vessels cannot block entrances to marinas, so there is limited time to work nets in these areas.

- b. Navigation Infrastructure: Navigation channels are the main risk to treaty rights in the “Navigation Infrastructure” critical infrastructure category. Concerns include increased commercial vessel congestion, placement of Aids to Navigation, channel depth, water temperature and sediment contamination. Silting along the banks of the Duwamish Channel reduces the area available for fishing and historical dredge projects have overlooked this concern. Warming water temperatures are lethal for salmon species. Shallow water is linked to the warming concern. Deepening the channels through dredging also raises concerns due to the potential risk of releasing sediment contaminants. Discussed mitigations include increased boater education on tribal treaty rights and better coordination with waterway users (e.g., ferry operators, dredge vessels and recreational boaters).
- c. Commercial Maritime Facility: Several facilities were identified in the “Commercial Maritime Facility” critical infrastructure category as posing a risk to treaty rights. The following provides a list of the facility and attributed concerns:
- 1) Bellingham Cruise Terminal/Ferry Terminal. Primary concern – Increased vessel traffic and congestion.
  - 2) BP Cherry Point Refinery. Primary concern - Increased vessel traffic and congestion.
  - 3) Terminal 46 (T46) - Seattle, WA. Primary concern - Bank access for fishing areas.
  - 4) Terminal 5 (T5) – Seattle, WA. Primary concern - Increased vessel size at terminal. Backwash from larger vessels that may move or destroy nets that are across the channel.
  - 5) Terminal 115 (T115) – Seattle, WA. Primary concern - Increased barge traffic causing relocation of tribal fishing nets. Tribes previously only moved nets five to ten times per year, but currently move nets approximately 200 times due to increased vessel congestion. Net moves cost tribes time and money. Net replacement is expensive and costs approximately \$15,000 per net.
  - 6) Cruise Ship Terminals 6, 90/91 (T6, T90/91) – Seattle, WA. Primary concern - Cruise ship traffic has significantly increased. Presence of cruise ships in port limit access to U&A fishing grounds.
  - 7) Pilings associated with facilities (Duwamish Waterway) – Seattle, WA. Primary concern - Nets getting set on facility pilings. Barges along the bank in the vicinity of the Duwamish Yacht Clube (above 16<sup>th</sup> street) pose the same risk.
- d. Maritime Support Facility: Anchorages are the main risk to treaty rights in the “Maritime Support Facility” critical infrastructure category. Concern was raised that larger vessels entering the Port of Seattle using anchorages will create larger swing circles and potentially damage tribal nets or impact access to U&A fishing grounds.
- e. Mitigations and other concerns: Increased education and communication with the maritime community regarding treaty rights and protecting access to U&A fishing grounds. Better



communication with tribes in advance of proposed waterway projects, cruise ship schedules, and permitted marine events that may impact treaty rights. Enhanced outreach by tribes to communicate with the Coast Guard and maritime community regarding opening dates of fisheries to minimize conflicts with anchorages and vessel routing measures. Intra-party coordination and partnerships are preferrable to legislation as it is faster, more agile, and usually less intrusive. There is a shared feeling among tribal members that access, and the physical size of U&A fishing grounds continues to be limited and is getting smaller due to large commercial vessels. They feel they are continuously being squeezed out of access to their fishing grounds due to increased activities on the waterway. Waterway infrastructure that supports and improves healthy and native fish stocks are most important to tribal communities. Additionally, awareness of intra-tribal politics and nuances is important (example, what works for one tribe may not be the preferred action for another.) There are deep rooted differences in tribal fisheries and it is important to treat each tribal treaty right concern individually vice providing a cumulative wholesale solution.

6. **Initial Analysis.** In addition to the identification of critical infrastructure and associated risks, the BOI team noted the following discussions or themes worth highlighting.

- a. **Resilience.** Puget Sound, including the Ports of Seattle and Tacoma is a resilient port complex. Many factors play into this fact, but none more than the unique geography of Puget Sound. The United States Geological Survey defines Puget Sound as a bay with numerous channels and branches; more specifically, it is a fjord system of flooded glacial valleys. Puget Sound is a large, deep water, saltwater estuary. Major cities on the sound include Seattle, Tacoma, Olympia, and Everett. It became apparent during the discussion that, in most cases, there is either enough physical room on the waterways or redundancies built into the system to mitigate debilitating consequences if a large-scale event occurred. Participants agreed that in most cases a single piece of critical infrastructure would not create a full stop to operations across the entirety of the port complex and would likely be isolated to only directly impacted areas of the port.
- b. **Marine Transportation System (MTS) Recovery Essential Elements of Information (EEI).** The Coast Guard Sector Puget Sound MTS Recovery Plan, like most Coast Guard Sectors, lists hundreds of EEIs for MTS recovery considerations. This list served as the basis of the BOI critical infrastructure list. While validation occurs annually, it was apparent that several EEIs discussed, were unanimously not considered critical to port operations.
- c. **Debilitating Consequences Beyond the Study Area.** Several scenarios identified that Alaskan communities critically rely on cargo from the Puget Sound region and that a worst-case scenario would create debilitating consequences way beyond the boundaries of the BOI study area. The industries most vulnerable are containerized cargoes and commercial fishing industries.

7. **Summary and Follow-Up:** Overall, the Puget Sound BOI port visit went very well. Notably, there was excellent stakeholder participation that facilitated robust and meaningful dialogue. The BOI port visit team and Sector Puget Sound personnel found great value in the collaboration generated between tribal, federal, state, and local authorities to better understand concerns related to risks of the MTS. The BOI port visit team would like to extend our thanks and appreciation to Sector Puget Sound Prevention Department for coordinating the local administration and logistics for the BOI port visit and to all the

participants for taking the time and effort to engage in this process. Over the next few months, the BOI team will continue to compile data to inform Puget Sound's holistic port assessment. All final products

will be routed for review, approval, and public release to the Coast Guard Deputy Commandant of Operations by May 2025.

#

Enclosure: (1) Puget Sound BOI Study Area

Copy: D13 (dpw)  
D13 (dpi)  
D13 (dei)

## PUGET SOUND PILOTAGE DISTRICT ACTIVITY REPORT

**Jan-2025**

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.

<b>Activity</b>									
Total pilotage assignments:	606		Cancellations:		8				
Total ship moves:	598	Cont'r:	191	Tanker:	199	Genl/Bulk:	128	Other:	80
Assignments delayed due to unavailable rested pilot:	6		Total delay time:		5.75			hours	
Assignments delayed for efficiency reasons:	12		Total delay time:		19.5			hours	
Billable delays by customers:	54		Total delay time:		123				
Order time changes by customers:	152								
2 pilot jobs:	42	Reason:	PSP GUIDELINES FOR RESTRICTED WATERWAYS						
Day of week & date of highest number of assignments:	WED, 1/1/25						8		
Day of week & date of lowest number of assignments:	SAT, 1/25/25						31		
Total number of pilot repositions	104	Upgrade trips	20		YTD	20			
3 consecutive night assignments:	31	YTD	31						

Callback Days/Comp Days				
Starting Total	Call Backs (+)	Used (-)	Burned (-)	Ending Total
Licensed	2589	57	38	2608
Unlicensed	25		15	10
<b>Total</b>	<b>2614</b>			<b>2618</b>

**On watch assignments 545      Call back assignments 61      CBJ ratio 10.07%**

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		
13-Jan	14-Jan	Seattle	PMI	ULCV Simulator	BOU(2on*), BOZ(2on*), MIL(2on*)		
20-Jan	23-Jan	Seattle	PMI	ULCV Simulator	BOU(3off)		
20-Jan	20-Jan	Seattle	PMI	ULCV Simulator	CAI		
21-Jan	22-Jan	Seattle	PMI	ULCV Simulator	VEL(2on*)		
22-Jan	22-Jan	Seattle	PMI	ULCV Simulator	CAI		
1-Jan	31-Jan			Upgrade Assignments On Duty	HOA*, KNU*, MAM*, MIE*, STA* VEL*		
1-Jan	31-Jan			Upgrade Assignments Off Duty	BOZ(2off), MAN(3off), MAM, RID(6off), STA, VEL		
					* On Watch	Off Watch	** paired to assign.
					14	19	0

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

Start Dt	End Dt	City	Group	Meeting Description	Pilot Attendees
1-Jan	9-Jan	Seattle	PSP	Ops Pilot	GRK(8off)
4-Jan	12-Jan	Vicksburg, MS	PSP	NWSA-Safe Practices	BOU(8on*), COL(8on*)
7-Jan	7-Jan	Seattle	PSP	UTC, Pension	GRK, KLA, MIE*, MIL*
9-Jan	15-Jan	Seattle	PSP	President	GRK(6off)
9-Jan	9-Jan	Seattle	PSP	Administrative, PA	COR*, JEN**, MAN, MCN*, ROU, SEM*
11-Jan	18-Jan	Vicksburg, MS	PSP	NWSA-Safe Practices	SCR(7on*), SEM(6on*,1off)
13-Jan	13-Jan	Seattle	PSP	Rate Committee	GRK, KLA, KNU, MCG

Start Dt	End Dt	City	Group	Meeting Description	Pilot Attendees			
13-Jan	13-Jan	Port Angeles	PSP	PA Employees	MYE*			
15-Jan	28-Jan	Seattle	PSP	Ops Pilot	GRK(13on*)			
15-Jan	15-Jan	Seattle	BPC	TEC	ANT, BOZ, KNU*			
15-Jan	15-Jan	Seattle	BPC	BPC Prep	ANT, KNU*			
16-Jan	16-Jan	Seattle	BPC	BPC	ANT*, KNU*			
17-Jan	17-Jan	Seattle	PSP	Lobbyist	MCG*			
21-Jan	21-Jan	Seattle	PSP	BOD	GRK*, HAM*, HUP*, KEP, KLA*, MCG*, MIL, MYE*			
21-Jan	21-Jan	Seattle	PSP	UTC	KNU**			
21-Jan	21-Jan	Tacoma	PSP	Outreach	MEL*			
21-Jan	21-Jan	Seattle	BPC	VEC	ANT*, CAS*			
22-Jan	22-Jan	Seattle	PSP	Rate Committee	GRK*, KLA*, KNU*, MCG*			
23-Jan	23-Jan	Lacy	PSP	UTC	KLA*, MCG*			
23-Jan	23-Jan	Tukwila	PSP	Outreach	VON*			
27-Jan	27-Jan	Seattle	PSP	Administrative	HAM, MCG*			
28-Jan	31-Jan	Vancouver, BC	PSP	Cruise Symposium 2025	KAL(3on*)			
28-Jan	31-Jan	Seattle	PSP	Ops Pilot	KEP(2on*,2off*)			
28-Jan	29-Jan	Seattle	psp	Outreach, Legislative	HAM(2off), NIN(2off), VON(2on*)			
30-Jan	30-Jan	Seattle	PSP	Administrative, PA	MCN, ROU			
					* On Watch	Off Watch	** paired to assign.	
					77	37	2	

**Safety/Regulatory**

**Outreach**

**Administrative**

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

Start Dt	End Dt	REASON	PILOT
28-Jan	31-Jan	NFFD	MOO

Trailing 12 months revenue assignments

7,567

Call back job ratio during the last 12 months (Feb 2024-Jan 2025) 11.63%

# Puget Sound District Activity Report Dashboard

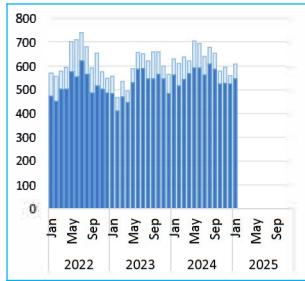
2025 January

Last modified  
02/18/2025

Licensed Pilots  
Including President  
**56**

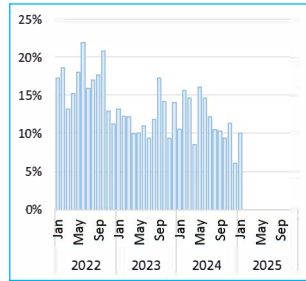
PS District  
Trainees  
**6**

Monthly Total  
Assignment Count  
**606**

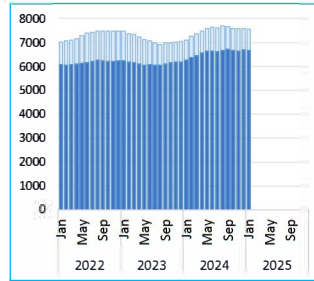


545 On-Watch (dk blue), 61 Off-Watch (lt blue)

Monthly Off-Watch  
Assignment Percentage  
**10.1%**

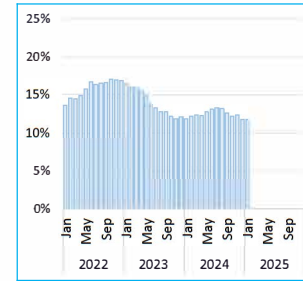


Trailing 12 Total  
Assignment Count  
**7567**



6681 On-Watch (dk blue), 886 Off-Watch (lt blue)

Trailing 12 Off-Watch  
Assignment Percentage  
**11.7%**



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

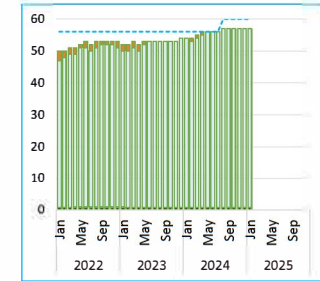
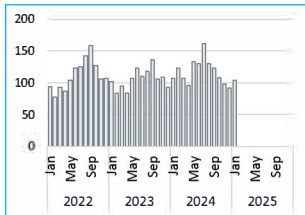
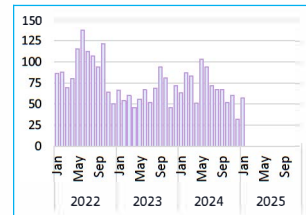


chart also includes president (1 pilot)

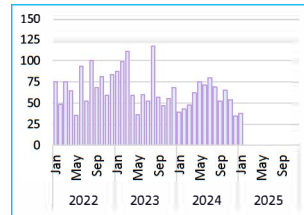
Repositions  
**104**



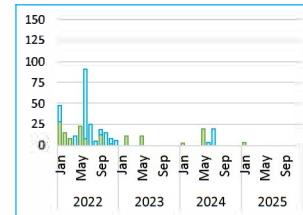
Comp Days Earned  
(Callbacks)  
**57**



Comp Days Used  
(Licensed Pilots)  
**38**

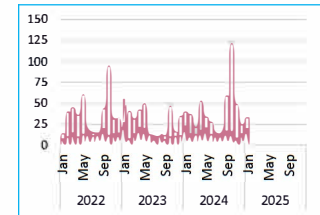


COVID Days\* **0**  
NFFD Days\* **4**



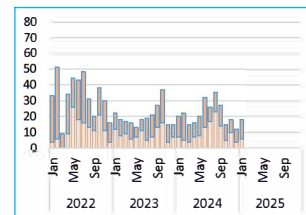
count of NFFD & Covid days if  
pilot(s) not NFFD whole month

Training Days **13**  
Upgrade Trips **20**



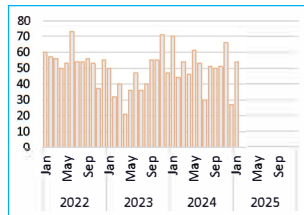
training days (red) stacked  
on upgrade trips (blue)

Pilot Delays (Count)  
combined total  
**18**

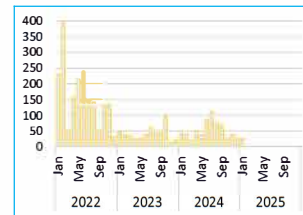


efficiency delay counts stacked on top  
of pilot shortage delay counts on bottom

Billable Delays (Count)  
by Customers  
**54**

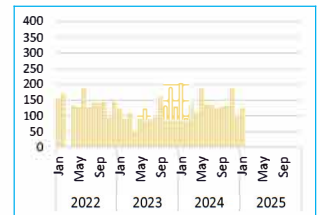


Pilot Delay Hours  
(Pilot Shortage & Efficiency)  
**25.25 hrs**



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

Billable Delay Hours  
by Customers  
**123 hrs**



## **Port of Grays Harbor**

### **Pilotage Report**

**February 20, 2025**

#### Pilotage Activity

There were a total of 10 arrivals in January of 2025 (5 dry bulkers and 5 RoRo) for a total of 25 jobs. This includes two cancellations and a number of anchorage jobs due to bad weather.

The February schedule shows 7 arrivals scheduled so far: 2 RoRo's and 5 dry bulkers.

#### Man Overboard Training

The Port's Director of Health, Safety & Environment Randy Lewis, Captains Leo, Grobschmit, and pilot trainee Ryan Campbell, along with Brusco's pilot boat crew, participated in joint MOB training at the Coast Guard Station in Westport. The training included a presentations by the pilots and discussion with station personnel on procedures and capabilities. That was followed by underway drills including the recovery of an OSCAR dummy by both pilot boats and a Coast Guard lifeboat. Captain Leo provided an after-action report that included recommendations for several improvements. Staff has begun to work to address items needing additional equipment or modifications to the vessels. All are relatively straight forward and can be completed in the near future. The Coast Guard station and pilots have agreed to conduct training every 6 months.

#### Terminal 4 Expansion

AGP's contractors are fully involved with construction at the new T4B export facility, and the Port is continuing to gear up and prepare for construction of the public improvements. AGP is currently on a tight schedule to complete in-water pile-driving by the closure of the in-water work window on February 15. They have also begun excavating for the dump pit and rail unloading facilities.

#### Dredging

The derrick barge, Patriot, along with the American Construction Company crew mobilized to Terminal 3 to begin the winter round terminal maintenance dredging on midnight February 1<sup>st</sup>. American spent 2.5 working days at Terminal 3, completing the work mid-morning on the 3<sup>rd</sup>. They then transitioned to Terminal 4 later that morning, started dredging the berth at lunch time. T4 was completed much earlier than anticipated, wrapping up cleanup in the evening of the 4<sup>th</sup>.

American will spend approximately 5-6 days at Terminal 2. They will then slide to the west and finish terminal maintenance dredging at Terminal 1, which is expected to last a 12-hour shift.

Post dredge surveys for Terminals 3 and 4 are expected to take place on February 5<sup>th</sup>. Post dredge surveys for Terminals 1 and 2 are expected to take place as soon as possible, once the dredging has been completed.

# PROPOSED RULE MAKING



## CR-102 (June 2024) (Implements RCW 34.05.320)

Do **NOT** use for expedited rule making

**Agency:** Board of Pilotage Commissioners

- Original Notice**  
 **Supplemental Notice to WSR** \_\_\_\_\_  
 **Continuance of WSR** \_\_\_\_\_

- Preproposal Statement of Inquiry was filed as WSR 24-21-165 ; or**  
 **Expedited Rule Making--Proposed notice was filed as WSR \_\_\_\_\_; or**  
 **Proposal is exempt under RCW 34.05.310(4) or 34.05.330(1); or**  
 **Proposal is exempt under RCW \_\_\_\_\_.**

**Title of rule and other identifying information:** (describe subject) WAC 363-116-082 Limitations on new pilots

**Hearing location(s):**

Date:	Time:	Location: (be specific)	Comment:
April 17, 2025	10:00am	2901 3 <sup>rd</sup> Avenue, Seattle, WA and via MS Teams	For a link to the meeting, please visit <a href="http://www.pilotage.wa.gov">www.pilotage.wa.gov</a>

**Date of intended adoption:** April 17, 2025 (Note: This is **NOT** the **effective** date)

**Submit written comments to:**

Name Jaimie C. Bever  
 Address 2901 3<sup>rd</sup> Avenue, Suite 500, Seattle, WA 98121  
 Email [jaimie.bever@wsdot.wa.gov](mailto:jaimie.bever@wsdot.wa.gov)  
 Fax \_\_\_\_\_  
 Other \_\_\_\_\_

Beginning (date and time) February 21, 2025

By (date and time) April 9, 2025

**Assistance for persons with disabilities:**

Contact Jolene Hamel  
 Phone 206-515-3904  
 Fax \_\_\_\_\_  
 TTY \_\_\_\_\_  
 Email [jolene.hamel@wsdot.wa.gov](mailto:jolene.hamel@wsdot.wa.gov)  
 Other \_\_\_\_\_

By (date) April 9, 2025

**Purpose of the proposal and its anticipated effects, including any changes in existing rules:** The proposed revisions to pilot licensing limitations aims to ensure that newly licensed pilots gain the necessary experience and that pilotage services can meet the growing demands of the Port of Grays Harbor. By adopting a more flexible and multifaceted approach, the district will be better equipped to support its expanding infrastructure and increasing vessel traffic, while maintaining high safety standards.

**Reasons supporting proposal:** The changes will revise the pilot licensing limitations within the Grays Harbor Pilotage District to better align with the Port's evolving traffic patterns. The existing licensing restrictions no longer match the types of vessels calling at the GH Pilotage District, leading to the following challenges: newly licensed pilots facing restrictions, inconsistent assignment of technically challenging jobs, enhanced port infrastructure, return of car carrier vessels, and upcoming retirements. Rather than relying solely on gross tonnage, the new proposed limitations would incorporate additional criteria, including vessel length, draft, and tonnage, to determine which vessels newly licensed pilots can safely handle. This more dynamic approach would better align with the operational realities of the Port, improving both safety and efficiency in pilot assignments.

**Statutory authority for adoption:** Chapter 88.16 RCW, Pilotage Act

**Statute being implemented:** Chapter 88.16 RCW, Pilotage Act

**Is rule necessary because of a:**

- |                         |                              |  |
|-------------------------|------------------------------|--|
| Federal Law?            | <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No |
| Federal Court Decision? | <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No |
| State Court Decision?   | <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No |

If yes, CITATION:

**Agency comments or recommendations, if any, as to statutory language, implementation, enforcement, and fiscal matters:** The Board received a recommendation from the Trainee Evaluation Committee (TEC) favoring implementation of the proposed language based on the benefits listed above. The TEC develops and monitors the pilot license upgrade program.

**Name of proponent:** (person or organization) Board of Pilotage Commissioners

**Type of proponent:**  Private.  Public.  Governmental.

**Name of agency personnel responsible for:**

	Name	Office Location	Phone
Drafting	Jaimie Bever	Seattle, WA	206-515-3887
Implementation Commissioners	Board of Pilotage	Seattle, WA	206-515-3904
Enforcement Commissioners	Board of Pilotage	Seattle, WA	206-515-3904

**Is a school district fiscal impact statement required under [RCW 28A.305.135](#)?**

Yes  No

If yes, insert statement here:

The public may obtain a copy of the school district fiscal impact statement by contacting:

- Name
- Address
- Phone
- Fax
- TTY
- Email
- Other

**Is a cost-benefit analysis required under [RCW 34.05.328](#)?**

Yes: A preliminary cost-benefit analysis may be obtained by contacting:

- Name
- Address
- Phone
- Fax
- TTY
- Email
- Other

No: Please explain: RCW 34.05.328 does not apply to the adoption of these rules. The Washington State Board of Pilotage Commissioners is not a listed agency in RCW 34.05.328(5)(a)(i).

**Regulatory Fairness Act and Small Business Economic Impact Statement**

Note: The [Governor's Office for Regulatory Innovation and Assistance \(ORIA\)](#) provides support in completing this part.

**(1) Identification of exemptions:**

This rule proposal, or portions of the proposal, **may be exempt** from requirements of the Regulatory Fairness Act (see [chapter 19.85 RCW](#)). For additional information on exemptions, consult the [exemption guide published by ORIA](#). Please check the box for any applicable exemption(s):

This rule proposal, or portions of the proposal, is exempt under [RCW 19.85.061](#) because this rule making is being adopted solely to conform and/or comply with federal statute or regulations. Please cite the specific federal statute or regulation this rule is being adopted to conform or comply with, and describe the consequences to the state if the rule is not adopted.

Citation and description:

This rule proposal, or portions of the proposal, is exempt because the agency has completed the pilot rule process defined by [RCW 34.05.313](#) before filing the notice of this proposed rule.

This rule proposal, or portions of the proposal, is exempt under the provisions of [RCW 15.65.570\(2\)](#) because it was adopted by a referendum.



- This rule proposal, or portions of the proposal, is exempt under [RCW 19.85.025\(3\)](#). Check all that apply:
- |   |  |
|---|--|
| <input type="checkbox"/> <a href="#">RCW 34.05.310</a> (4)(b)<br>(Internal government operations) | <input checked="" type="checkbox"/> <a href="#">RCW 34.05.310</a> (4)(e)<br>(Dictated by statute)  |
| <input type="checkbox"/> <a href="#">RCW 34.05.310</a> (4)(c)<br>(Incorporation by reference)     | <input type="checkbox"/> <a href="#">RCW 34.05.310</a> (4)(f)<br>(Set or adjust fees)  |
| <input type="checkbox"/> <a href="#">RCW 34.05.310</a> (4)(d)<br>(Correct or clarify language)    | <input type="checkbox"/> <a href="#">RCW 34.05.310</a> (4)(g)<br>((i) Relating to agency hearings; or (ii) process requirements for applying to an agency for a license or permit) |
- This rule proposal, or portions of the proposal, is exempt under [RCW 19.85.025\(4\)](#). (Does not affect small businesses).
- This rule proposal, or portions of the proposal, is exempt under RCW \_\_\_\_\_.
- Explanation of how the above exemption(s) applies to the proposed rule:

**(2) Scope of exemptions:** *Check one.*

- The rule proposal: Is fully exempt. (*Skip section 3.*) Exemptions identified above apply to all portions of the rule proposal.
- The rule proposal: Is partially exempt. (*Complete section 3.*) The exemptions identified above apply to portions of the rule proposal, but less than the entire rule proposal. Provide details here (consider using [this template from ORIA](#)):
- The rule proposal: Is not exempt. (*Complete section 3.*) No exemptions were identified above.

**(3) Small business economic impact statement:** *Complete this section if any portion is not exempt.*

If any portion of the proposed rule is **not exempt**, does it impose more-than-minor costs (as defined by RCW 19.85.020(2)) on businesses?

- No Briefly summarize the agency's minor cost analysis and how the agency determined the proposed rule did not impose more-than-minor costs. \_\_\_\_\_
- Yes Calculations show the rule proposal likely imposes more-than-minor cost to businesses and a small business economic impact statement is required. Insert the required small business economic impact statement here:

The public may obtain a copy of the small business economic impact statement or the detailed cost calculations by contacting:

Name  
Address  
Phone  
Fax  
TTY  
Email  
Other

**Date:** February 21, 2025

**Name:** Jaimie C. Bever

**Title:** Executive Director

**Signature:**

Place signature here

**WAC 363-116-082 Limitations on new pilots.** (1) The following limitations and pilot license upgrade requirements shall apply to a newly licensed pilot during their first five years of active service. For purposes of this section, the term "tank vessel" shall, in addition to tank ships, include any articulated or integrated tug and tank barge combinations, and any tonnage restrictions thereon shall be calculated by including the gross tonnage of the tug and tank barge combined. For purposes of this section, the term "petroleum products" shall include crude oil, refined products, liquefied natural gas, and liquefied petroleum gas. GT (ITC) as used in this section refers to gross tonnages measured in accordance with the requirements of the 1969 International Convention on Tonnage Measurement of Ships. Length overall (LOA) refers to maximum length of a vessel hull measured perpendicular to the waterline, measured vertically to the lowest point of the hull, keel, propellers, or other reference point.

(2) Puget Sound pilotage district - License limitation periods. Except for trips being made for pilot license upgrades, licenses issued in the Puget Sound pilotage district shall have the following limitations:

License Year	Maximum Size of Tank Vessels Carrying Petroleum Products as Bulk Cargo	Maximum Size of Other Vessels	Waterways
1	Piloting on vessels of any size prohibited	38,000 GT (ITC) except for passenger vessels which may only have a maximum size of 5000 GT (ITC)	Prohibited in the Duwamish Waterway on vessels greater than 3,000 GT
2	32,000 GT (ITC)	48,000 GT (ITC)	No restrictions
3	40,000 GT (ITC)	60,000 GT (ITC)	No restrictions
4	50,000 GT (ITC)	70,000 GT (ITC)	No restrictions
5	65,000 GT (ITC)	95,000 GT (ITC)	No restrictions

(3) Puget Sound pilotage district - Pilot license upgrade requirements. Progressive lifting of tonnage limitations requires a newly licensed pilot to satisfactorily pilot vessels on the trips specified in this section. The trainee evaluation committee shall recommend to the board a series of trips to be made by each pilot in the last 180 days of each year of the license limitation periods specified in subsection (2) of this section. As to these trips, the trainee evaluation committee shall specify the size and type of the vessel; origin and destination, whether the transit is to include a docking, waterway transit or other particular maneuvering requirement, whether any tank vessel trips are to be made while in ballast or loaded and whether the trip shall be taken with training pilots, trainee evaluation committee member pilots or pilots with a specified experience level. To the extent practical, the trips shall be on vessels of at least a size that falls between the upper limit in the expiring license limitation and the upper limit in the upcoming license limitation period. All of these trips shall be complete trips between one port and another port, between the pilot station and a port, or harbor shifts. The supervising pilots shall complete and submit to the board a familiarization form provided by the board for each trip a new pilot performs.

(4) Grays Harbor pilotage district - License limitation periods. Pilots licensed in the Grays Harbor pilotage district shall not pilot vessels in violation of the restrictions set forth in the table below during the indicated license year.

License Year	Maximum Size of Tank Vessels Carrying Petroleum Products as Bulk Cargo	Maximum Size of Other Vessels
((1	Piloting on vessels of any size prohibited	32,000 GT (ITC) except that piloting on vessels of any size is prohibited through the Chehalis River Bridge unless vessel is in ballast and does not exceed 25,000 GT (ITC)
2	15,000 GT (ITC)	42,000 GT (ITC)
3	32,000 GT (ITC)	52,000 GT (ITC))
0-6 months	Prohibited	38,000 GT (ITC)/LOA 200m (656 feet)/Draft 11.5m (37.7 feet). Passenger vessels prohibited.
1	Prohibited	38,000 GT (ITC)/LOA 200m (656 feet)/Draft 11.7m (38.4 feet). Passenger vessels prohibited.
2	LOA 170m (557.6 feet)/11.2 (36.7 feet) draft	48,000 GT (ITC)/LOA 230m (754.4 feet)
3	LOA 185m (607 feet)/11.6m (38.0 feet) draft	60,000 GT (ITC)/LOA 230m (754.4 feet)
4	42,000 GT (ITC)	62,000 GT (ITC)
5	52,000 GT (ITC)	72,000 GT (ITC)

Notwithstanding subsection (7) of this section, upon determination that a bona fide safety concern may result from no pilot without license restrictions being available within a reasonable time to pilot a vessel requiring pilotage services, the chairperson or acting chairperson of the board, on a single trip basis, may authorize a newly licensed pilot holding a restricted license to provide pilotage services to the vessel, irrespective of the tonnage, service or location of the assigned berth of the vessel.

(5) Grays Harbor pilotage district - Pilot license upgrade requirements - Progressive lifting of tonnage limitations requires a newly licensed pilot to satisfactorily pilot vessels on the trips specified in this section. The trainee evaluation committee shall recommend to the board a series of trips to be made by each pilot in the last 180 days of each year of the license limitation periods specified in subsection (4) of this section. The trainee evaluation committee may assign trips to a newly licensed pilot prior to reaching 180 days of licensure if deemed necessary by the committee. As to these trips, the trainee evaluation committee shall specify the size and type of the vessel; origin and destination, whether the transit is to include a docking, waterway transit or other particular maneuvering requirement, whether any tank vessel trips are to be made while in ballast or loaded and whether the trip shall be taken with training pilots, trainee evaluation committee member pilots or pilots with a specified experience level. To the extent practical, the trips shall be on vessels of at least a size that falls between the upper limit in the expiring license limitation and the upper limit in the upcoming license limitation period. All of these trips shall be complete trips between one port and another port, between the pilot station and a port, or harbor shifts. The supervising pilots shall complete and submit to the

board a familiarization form provided by the board for each trip a new pilot performs.

If vessels are not available in the Grays Harbor pilotage district to allow a pilot to comply with this subsection in a timely manner, the board may designate substitute trips in the Puget Sound pilotage district as allowed by law and in so doing may specify the size of the vessel and any other characteristics of the trips that the board deems appropriate. Such designation shall be considered a modification of the pilot's state license to authorize the specified trips in the Puget Sound pilotage district.

The trainee evaluation committee may recommend to the board simulation trainings, in addition to upgrade trips, to be completed by pilots within the Grays Harbor pilotage district prior to completion of all upgrade trips and the lifting of all limitations.

(6) The initial license shall contain the limitations contained above and list the date of commencement and expiration of such periods. If a newly licensed pilot is unable to pilot for 45 days or more in any one of the five years the trainee evaluation committee may put a hold on the upgrade program. Upon the newly licensed pilot's return to the program, the trainee evaluation committee may prescribe an extension.

(7) Except as provided in subsection (4) of this section, no pilot shall be dispatched to, or accept an assignment on, any vessel which exceeds the limitations of their license. On vessels in which there is more than one pilot assigned, the license limitations shall apply only to the pilot in charge.

(8) All limitations on a pilot's license shall be lifted (~~(at the beginning of the sixth year of piloting)~~) after time periods prescribed in the tables in subsections (2) and (4) of this section, provided they have submitted to the board a statement attesting to the fact that the pilot has completed all the required license upgrade trips and the vessel simulator courses.

(9) Whenever the governor issues a proclamation declaring a state of emergency, the board may determine whether there is a threat to trainees, pilots, vessel crews, or members of the public. Notwithstanding the other provisions of this chapter, the board, at its discretion, may suspend or adjust the pilot training program during the pendency of a state of emergency lawfully declared by the governor.

# Tug Escort EIS – Air Quality



Figure 1. Eagle flying over the water in clear skies

**Draft information only. Please do not share. Information subject to change prior to DEIS publication.**

## Overview

This document summarizes impacts to air quality that could result from the rulemaking alternatives as assessed in the Environmental Impact Statement (EIS). **We did not find any significant and unavoidable adverse impacts to air quality for any of the alternatives.**

## Significance Findings/Overall Summary

A summary of the primary findings for each alternative is below. A few points are common across several or all alternatives:

- **For all alternatives, tug escort emissions of criteria pollutants do not cause or contribute to National Ambient Air Quality standards (NAAQS). Emissions of air toxics do not pose an unacceptable risk to human health.** There would be minor localized air quality impacts where the emissions occur and minor contributions to GHG emissions.
- Assessment includes the following air pollutants: nitrogen oxides (NO<sub>x</sub>), particulate matter (PM), sulfur dioxide (SO<sub>2</sub>), carbon monoxide (CO), volatile organic compounds (VOCs), air toxics, and greenhouse gases (GHG).
- Receptor locations for modeling were selected based on: concentration of escort tug underway time, sensitivity to changes in air quality (presence of environmental justice communities, areas with air-quality related health overburdens), Tribal reservations, areas of public interest, availability of monitoring data.
- Air quality impacts in the event of an oil spill are discussed but not found to be significant.

Table 1. Summary of impacts by Alternative

Alternative	Impacts/Description	Significant?
Alternative A: No Action	<ul style="list-style-type: none"> <li>• In general, emissions are highest at the Anacortes and James Island receptor locations</li> </ul>	No

Alternative	Impacts/Description	Significant?
	<ul style="list-style-type: none"> <li>Although modeled emissions from the tugs occasionally exceed the most conservative thresholds for NO<sub>2</sub> and PM<sub>2.5</sub>, they are within the acceptable range for both human health and air quality.</li> <li>Estimated 12,000 tons per year of CO<sub>2</sub>e (GHG emissions). This is approximately 0.01% of Washington State’s emissions in 2019.</li> </ul>	
Alternative B: Addition of Functional and Operational Requirements	<ul style="list-style-type: none"> <li>Same as Alternative A</li> <li>Minor shift in distribution of emissions due to change in commute locations from reduction in use of lower horsepower tugs.</li> </ul>	No
Alternative C: Expansion	<ul style="list-style-type: none"> <li>Total annual emissions are approximately 2.5% greater than Alternative A. Increase in emissions near the Cherry Point receptor area, decrease at all other receptor locations.</li> <li>Annual average concentrations of PM<sub>2.5</sub> and NO<sub>2</sub> increase at Buckhorn (+10%), Cherry Point (+3%), and James Island (+0.5%) receptor locations. All other locations see a decrease in annual average concentrations of 2-4%.</li> <li>Hourly peak day NO<sub>2</sub> concentrations decrease by 10-20% at the Buckhorn location and by 10% at Lummi and Neptune Beach locations relative to Alternative A. Concentrations increase at Cherry Point location by 1% and are unchanged at other locations.</li> <li>Estimated 12,400 tons per year of CO<sub>2</sub>e (GHG emissions).</li> </ul>	No
Alternative D: Removal	<ul style="list-style-type: none"> <li>Elimination of emissions from tugs performing escort work under this rule.</li> </ul>	No

### Significance Thresholds Used

For air quality, we used the following thresholds to make a significance determination. A positive finding for any threshold would result in a finding of significant impact for that alternative.

- **Exceedance of National Ambient Air Quality Standards (NAAQS):** Reasonable likelihood of a chronic and recurring increase in the frequency, severity, and/or extent of air quality standard exceedances.
- **Human Health Risk:** Emissions would result in toxic air pollutant concentrations that could result in an increased lifetime cancer risk of more than ten per million.
- **WA State Emissions Reduction Goals:** Substantially inconsistent with state emissions reductions plans or goals for criteria pollutants and/or GHGs.

### Summary of Mitigation Included in the EIS

In the EIS, we propose the following mitigation measures related to air quality:

#### Required Mitigation (Rulemaking or other Existing Regulations):

- In rulemaking language: Selection of geographic alternatives and functional and operational requirements may affect distribution of emissions.
- In other regulations: Compliance with low sulfur fuels requirements, continued adherence to existing federal and state vessel traffic safety regulations.

**Proposed Mitigation (Voluntary or Suggested):**

- Encourage participation in voluntary slowdowns which have been shown to have emissions reduction benefits.
- Encourage consideration of transition to more efficient and zero-emission propulsion as technological readiness and cost increase the feasibility of these technologies.



Figure 2. Map of receptor locations used for the modeling



Haley Kennard  
Haley.Kennard@ecy.wa.gov  
564-233-5178



To request an ADA accommodation, contact Ecology by phone at 360-407-6831 or email at [ecyadacoordinator@ecy.wa.gov](mailto:ecyadacoordinator@ecy.wa.gov), or visit <https://ecology.wa.gov/accessibility>. For Relay Service or TTY call 711 or 877-833-6341.



# Tug Escort EIS – Oil Pollution



Figure 1. An oil spill

**Draft information only. Please do not share. Information subject to change prior to DEIS publication.**

## Overview

This document summarizes impacts to oil pollution risk that could result from the rulemaking alternatives as assessed in the Environmental Impact Statement (EIS). **We found significant and unavoidable adverse impacts to oil pollution risk for Alternative D (Removal).** Impacts of oil pollution on other elements of the EIS (recreation, Tribal resources, etc.) are summarized in those sections.

## Significance Findings/Overall Summary

A summary of the primary findings for each alternative is below. A few points are common across several or all alternatives:

- A target vessel drift grounding is a serious marine event. A drift grounding could result in a spill which would have major environmental consequences.
- The tug hazard measure includes all hazard event types. While these are reportable, many are low-consequence and most do not result in a spill. Tugs also carry far less oil than the target vessels.
- Ecology did trajectory modeling for a series of 9 worst case spills in the rulemaking area. Any major spill in this area could have broad consequences for the region, affecting sensitive ecological resources and habitats, water quality, recreation, and tribal resources including archaeological sites.

Table 1. Summary of impacts by alternatives

Alternative	Impacts/Description	Significant?
Alternative A: No Action	<ul style="list-style-type: none"> <li>• Probability of a drift grounding from a target vessel in the EIS Study Area: 186-year event.                             <ul style="list-style-type: none"> <li>• Rosario Strait Zone: 16,931-year event</li> <li>• Bellingham Channel Zone: 8,470-year event</li> <li>• Guemes and Saddlebags Zone: 4,046-year event</li> <li>• Strait of Georgia South: 49,007-year event</li> <li>• Strait of Georgia: 7,180-year event</li> </ul> </li> <li>• Probability of any hazard from an escort tug is 0.86/year</li> </ul>	No

Alternative	Impacts/Description	Significant?
Alternative B: Addition of Functional and Operational Requirements	<ul style="list-style-type: none"> <li>• Same as Alternative A</li> <li>• Minor and unquantified reduction in risk due to standardization of functional and operational requirements.</li> </ul>	No
Alternative C: Expansion	<ul style="list-style-type: none"> <li>• Probability of a drift grounding from a target vessel in the EIS Study Area: 189-year event (1.6% reduction from Alternative A, risk reduction benefits concentrated in the expansion area).                             <ul style="list-style-type: none"> <li>• No change to Rosario Strait, Bellingham Channel, or Guemes and Saddlebags Zones.</li> <li>• Strait of Georgia South: Modeled risk reduced to near zero.</li> <li>• Strait of Georgia: 8,025-year event</li> </ul> </li> <li>• Probability of any hazard from an escort tug is 0.88/year (2.41% increase in risk from an escort tug, risk concentrated in expansion area).</li> </ul>	No
Alternative D: Removal	<ul style="list-style-type: none"> <li>• Probability of a drift grounding from a target vessel in the EIS Study Area: 167-year event (11.84% increase from Alternative A).                             <ul style="list-style-type: none"> <li>• Risk increase just in the rulemaking area is 90.5% (0.00042/year in Alternative A vs. 0.00081/year in Alternative D).</li> </ul> </li> <li>• Risk of hazard incident from an escort tug associated with this rule is eliminated because requirements are removed.</li> </ul>	Yes

### Significance Thresholds Used

For oil pollution, we used the following thresholds to make a significance determination. A positive finding for either threshold would result in a finding of significant impact for that alternative.

- **Target Vessels:** increase in frequency of drift groundings that results in a reasonable likelihood of increased frequency, severity, and/or extent of oil spills.
- **Escort Tugs:** increase in frequency of hazards from escort tugs that results in a reasonable likelihood of increased frequency, severity, and/or extent of oil spills.

### Summary of Mitigation Included in the EIS

In the EIS, we propose the following mitigation measures related to oil pollution:

#### Required Mitigation (Rulemaking or other Existing Regulations):

- In rulemaking language: None, beyond the potential benefits of tug escort requirements for the geographic alternatives and including the functional and operational requirements.
- In other regulations: Continued adherence to existing federal and state vessel traffic safety and oil pollution prevention, preparedness, and response regulations.

#### Proposed Mitigation (Voluntary or Suggested):

- Encourage operators to continue to follow the Puget Sound Harbor Safety Committee Harbor Safety Plan Standards of Care and other industry best practices.
- Extension of applicable Puget Sound Harbor Safety Committee Harbor Safety Plan Standards of Care to 5,000 to 40,000 DWT escorts.



Haley Kennard  
Haley.Kennard@ecy.wa.gov  
564-233-5178



To request an ADA accommodation, contact Ecology by phone at 360-407-6831 or email at [ecyadacoordinator@ecy.wa.gov](mailto:ecyadacoordinator@ecy.wa.gov), or visit <https://ecology.wa.gov/accessibility>. For Relay Service or TTY call 711 or 877-833-6341.

# Tug Escort EIS – Plants and Animals



Figure 1. Two orcas with a small boat in the background

**Draft information only. Please do not share. Information subject to change prior to DEIS publication.**

## Overview

This document summarizes impacts to plants and animals that could result from the rulemaking alternatives as assessed in the Environmental Impact Statement (EIS). **We found significant and unavoidable adverse impacts to plants and animals for all alternatives.** The finding for Alternatives A, B, and C was due to significant levels of harmful underwater noise. The finding for Alternative D was for the increase in oil pollution risk and impacts to plants and animals, from the removal of tug escort requirements.

## Significance Findings/Overall Summary

A summary of the primary findings for each alternative is below. A few points are common across several or all alternatives:

- Plant and animal resources assessed include marine mammals, fin fish, aquatic invertebrates, birds, terrestrial and semi-aquatic animals, intertidal and aquatic plants, and protected ecological areas and special aquatic habitats.
- Plant and animal resources in Alternatives A, B, and C experience continued potential for minor (not significant), localized impacts from escort tug activity including:
  - In-air operational noise (separate from underwater noise analysis)
  - Water quality impacts where routine discharges and releases occur
  - Marine mammal strike risks (no identified incidents of a tug being responsible for a marine mammal strike in WA, but there is overlap in tug and marine mammal activity).
  - Disturbances due to air emissions and artificial light
- Underwater noise and oil pollution impacts are considered significant primarily due to the precarious nature of the SRKW population (see significance thresholds below). The loss of a single animal represents a population decline of 1.4% and an impact to genetic diversity with consequences for the viability of the population. The NOAA SRKW Recovery Plan requires average population growth of 2.3% per year for 28 years for delisting.
- Underwater noise and the physical disturbance from vessels on marine mammals are both discussed, but assessed together as the stressors occur simultaneously.

Table 1. Summary of impacts by alternatives

Alternative	Impacts/Description	Significant?
Alternative A: No Action	<ul style="list-style-type: none"> <li>• Current levels of escort tug activity contribute to harmful levels of underwater noise in biologically important areas.</li> <li>• Low probability of oil pollution and associated impacts to plant and animal resources from target vessels and escort tugs.</li> </ul>	Yes (underwater noise)
Alternative B: Addition of Functional and Operational Requirements	<ul style="list-style-type: none"> <li>• Mostly the same as Alternative A.</li> <li>• Potential for some shifts in the distribution of the minor impacts described above based on shift in tug use.</li> <li>• Minor but unquantified benefits for oil spill and vessel traffic risk reduction from the functional and operational requirements.</li> </ul>	Yes (underwater noise)
Alternative C: Expansion	<ul style="list-style-type: none"> <li>• Minor increases over Alternative A in harmful levels of underwater noise in some biologically important areas from increased tug underway time.</li> <li>• Potential for some shifts in the distribution of the minor impacts described above, particularly into the expansion area.</li> <li>• Minor reduction in target vessel drift grounding rate (1.6%) in the EIS Study Area, benefits concentrated in the expansion area. Minor reduction risk of oil spill impacts to plants and animals from target vessels.</li> <li>• Minor increase in all-hazard incident rate for escort tugs and associated potential impacts (see vessel traffic summary for more detail).</li> </ul>	Yes (underwater noise)
Alternative D: Removal	<ul style="list-style-type: none"> <li>• Greater than 10% reduction in harmful levels of underwater noise at some biologically important receiver locations.</li> <li>• Elimination of potential minor, localized impacts from tugs escorting target vessels in the categories described above (operational noise, water quality, etc.).</li> <li>• Significant increase (11.84%) in risk of drift grounding across the EIS Study Area, and associated impacts to plant and animal resources from an oil spill.</li> </ul>	Yes (oil pollution)

### Significance Thresholds Used

For plants and animals, we used the following thresholds to make a significance determination. A positive finding for any threshold would result in a finding of significant impact for that alternative.

- **All Plant and Animal Resources:**
  - Reasonable likelihood of an increase in the frequency, severity, and/or extent of adverse impact beyond a moderate level that are **expected to affect the viability of a population or ecosystem.**
  - Reasonable likelihood of an increase in the frequency, severity, or extent of adverse impacts that **conflict with the provisions of relevant management plans.**
- **Additional Threshold for Marine Mammals:**
  - An increase of at least 10% in the occurrence and duration of periods during which the received noise levels are above the National Marine Fisheries Service behavioral disturbance levels.

## Summary of Mitigation Included in the EIS

In the EIS, we propose the following mitigation measures related to plants and animals:

### Required Mitigation (Rulemaking or other Existing Regulations):

- In rulemaking language: None, beyond the changes in underwater noise and oil spill risk resulting from selection of geographic alternatives.
- In other regulations: Continued adherence to existing federal and state regulations protecting SRKW and other marine mammals including but not limited to reducing speed and maintaining distance from SRKW.

### Proposed Mitigation (Voluntary or Suggested):

- Encourage continued participation in voluntary slow downs (e.g. ECHO Program, Quiet Sound) within the EIS Study Area, which have been shown to reduce underwater noise. To date, none of these have occurred in the areas with the highest amount of underwater noise increases due to escort tugs.
- Encourage compliance with the Be Whale Wise guidelines where safe and practicable to do so.
- Encourage continued voluntary participation in Puget Sound Harbor Safety Committee Standards of Care that reduce the risk of oil spills.
- Encourage consideration of transition to hybrid electric propulsion and fully electric propulsion in the long-term as technological readiness and cost increase the feasibility of these technologies.



Haley Kennard  
Haley.Kennard@ecy.wa.gov  
564-233-5178



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# Tug Escort EIS – Tribal Resources



Figure 1. Salmon swimming in a stream

**Draft information only. Please do not share. Information subject to change prior to DEIS publication.**

## Overview

This document summarizes impacts to Tribal resources that could result from the rulemaking alternatives as assessed in the Environmental Impact Statement (EIS). **We found significant and unavoidable adverse impacts to Tribal resources for all Alternatives.** The finding for Alternatives A, B, and C was due to vessel traffic impacts to treaty fishing and potential for marine mammal strikes. The finding for Alternative D was for the increase in oil pollution risk from the removal of tug escort requirements.

## Significance Findings/Overall Summary

A summary of the primary findings for each alternative is below. A few points are common across several or all alternatives:

- The entire EIS Study Area is the usual and accustomed fishing area of one or more Tribes. Treaty fisheries occur year-round and include a large variety of target species. Some Tribes have stated that current levels of vessel traffic negatively impact treaty fishing.
- Coastal archaeological resources are prevalent throughout the EIS Study Area. All modeled spill trajectories intersected with many known archaeological sites. These sites are primarily pre-contact (from prior to European arrival). Any large oil spill would likely affect these resources. Both the oil spill and associated clean-up could impact coastal archaeological resources. We also examined wake impacts and found them to be not significant.
- Most marine resources have cultural and/or economic significance for Tribes.

Table 1. Summary of impacts by alternatives

Alternative	Impacts/Description	Significant?
Alternative A: No Action	<ul style="list-style-type: none"> <li>• Continued contributions to vessel traffic impacts to treaty fishing (gear loss, access, interference, etc.).</li> <li>• Continued minor potential for marine mammal strikes. Marine mammals are identified as culturally significant species.</li> </ul>	Yes (vessel traffic, marine mammal strike potential)

Alternative	Impacts/Description	Significant?
	<ul style="list-style-type: none"> <li>Probability of a target vessel drift grounding that could result in oil pollution and associated impacts to Tribal resources is low. Hazard risk from escort tugs is also low.</li> </ul>	
Alternative B: Addition of functional and operational requirements	<ul style="list-style-type: none"> <li>Same as Alternative A.</li> <li>Potential for minor shifts in the distribution of escort tug commutes due to reduction in use of lower horsepower tugs.</li> <li>Minor but unquantified benefits for oil spill and vessel traffic risk reduction from the functional and operational requirements.</li> </ul>	Yes (vessel traffic, marine mammal strike potential)
Alternative C: Expansion	<ul style="list-style-type: none"> <li>Increase in interactions with Tribal fishing in the expansion area.</li> <li>Potential for marine mammal strikes increases in the expansion area.</li> <li>Minor reduction in probability of a target vessel drift grounding (and oil pollution and associated impacts to Tribal resources). These benefits are concentrated in the expansion area. Minor increase in risk of spills from escort tugs.</li> </ul>	Yes (vessel traffic, marine mammal strike potential)
Alternative D: Removal	<ul style="list-style-type: none"> <li>Increase in risk of a target vessel drift grounding by 11.84%. This is an increase in risk of oil pollution and associated impacts to Tribal resources.</li> <li>Minor reduction in vessel traffic from elimination of tug escort requirements for target vessels.</li> <li>Reduction in potential for marine mammal strikes.</li> </ul>	Yes (oil spill risk)

### Significance Thresholds Used

For Tribal resources, we used the following thresholds to make a significance determination. A positive finding for any threshold would result in a finding of significant impact for that alternative.

- **Aquatic Species and Habitat:** Continuation or introduction of adverse impacts to wildlife or habitats of cultural significance.
- **Water Quality:** Continuation or introduction of reasonable likelihood of disruption of Tribal activities dependent on water quality.
- **Treaty Fishing:** Continuation or introduction of new adverse impacts to the quality or operation of Tribal fishing areas.
- **Coastal Cultural Resources:** Continuation or introduction of adverse impact to cultural resources.

### Summary of Mitigation Included in the EIS

In the EIS, we propose the following mitigation measures related to Tribal resources:

#### Required Mitigation (Rulemaking or other Existing Regulations):

- In rulemaking language: Selection of geographic alternatives and functional and operational requirements may affect impacts to Tribal resources, operators must consider opportunities to coordinate with interested Tribes to avoid/reduce impacts.
- In other regulations: Northwest Area Contingency Plan policies for oil spills and cultural resources, including inadvertent discovery.



**Proposed Mitigation (Voluntary or Suggested):**

- Encourage development of agreements with interested Tribes for improved communication to reduce impacts to treaty fishing.
- Encourage operators to limit waiting time at rendezvous locations, particularly during active Tribal fishing.



Haley Kennard  
Haley.Kennard@ecy.wa.gov  
564-233-5178



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# Tug Escort EIS – Noise



Figure 1. Bubbles under the water representing underwater noise

**Draft information only. Please do not share. Information subject to change prior to DEIS publication.**

## Overview

This document summarizes impacts to underwater and operational noise that could result from the rulemaking alternatives as assessed in the Environmental Impact Statement (EIS). **We found significant and unavoidable adverse impacts from underwater noise for Alternatives A, B, and C.** Impacts of noise on other elements of the EIS (e.g. plants and animals) are summarized in those sections.

## Significance Findings/Overall Summary

A summary of the primary findings for each alternative is below. A few points are common across several or all alternatives:

- The National Marine Fisheries Service (NMFS) has determined that underwater noise over 120 dB can result in behavioral disturbances in marine mammals. Noise that exceeds this threshold is considered potentially harmful. Removing the tug escort requirements (Alternative D) does not completely eliminate harmful levels of underwater noise.
- We also assessed in-air noise and found no significant impacts for any alternative.

Table 1. Summary of impacts by alternatives

Alternative	Impacts/Description	Significant?
Alternative A: No Action	<ul style="list-style-type: none"> <li>• All seven biologically-sensitive receiver locations periodically exceed the 120 dB threshold. Locations with greater than 10% increase in time over 120 dB compared to Alternative D (updated)<sup>1</sup>:                             <ul style="list-style-type: none"> <li>• Rosario: +144 mins/week in winter (18% increase), +121 mins/week in summer (25% increase)</li> <li>• Anacortes: +36 mins/week in winter (29% increase)</li> <li>• Lummi: +15 mins/week in winter (13% increase),</li> </ul> </li> </ul>	Yes

<sup>1</sup> The previous version of this summary had additional locations with > 10% change in the summer and did not include the Lummi location. Numbers have been adjusted based on refinement of the analysis.

Alternative	Impacts/Description	Significant?
	<ul style="list-style-type: none"> <li>Area with noise above 120 dB: 118.4 km<sup>2</sup> in winter (2% increase over Alternative D), 80.7 km<sup>2</sup> in summer (4% increase over Alternative D) (updated).<sup>2</sup></li> <li>Average noise levels at most receiver locations are elevated compared to Alternative D. Modeled increase of up to 2.8 dB at the noisiest location (Rosario Strait) (updated).<sup>3</sup></li> </ul>	
Alternative B: Addition of Functional and Operational Requirements	<ul style="list-style-type: none"> <li>Same as Alternative A</li> <li>Potential for minor but unquantified increases in noise due to increase in use of higher horsepower tugs per the functional and operational requirements.</li> </ul>	Yes
Alternative C: Expansion	<ul style="list-style-type: none"> <li>Occurrence and duration of exceedance of the 120 dB threshold remain the same as under Alternative A.</li> <li>Minor increase in the area with noise over 120 dB (+0.1-0.2km<sup>2</sup>)</li> <li>Average noise levels increased minimally compared to Alternative A, only at the location closest to the expansion (Boundary Pass and Lummi) and only in winter. Slight reduction in noise for Lummi and Anacortes receptor location in summer (updated)<sup>4</sup></li> </ul>	Yes
Alternative D: Removal	<ul style="list-style-type: none"> <li>Occurrence and duration of exceedance of the 120 dB threshold reduced at some receiver locations (three in winter and four in summer).</li> <li>Area with noise over 120 dB is reduced.</li> <li>Average noise levels reduced for all receptor locations during at least one modeled season.</li> </ul>	No

### Significance Thresholds Used

For underwater noise, we used the following thresholds to make a significance determination. A positive finding for any threshold would result in a finding of significant impact for that alternative.

- **Increase in exceedance of the NMFS acoustic disturbance threshold (120 dB)<sup>5</sup>:**
  - Increase of at least 10% of the ensonified area above this threshold
  - Increase of at least 10% in the occurrence periods above this threshold
- **Increase in average underwater noise from baseline levels:**

<sup>2</sup> The previous version of this summary had smaller total ensonified area. Change remains below the significance threshold.

<sup>3</sup> The previous version of this summary had a higher modeled increase in average noise for Rosario Strait which exceeded the significance threshold (> 3dB).

<sup>4</sup> The previous version of this summary did not include changes in Lummi in winter or Anacortes in summer. Changes remain below the significance threshold.

<sup>5</sup> In response to comments received on this topic suggesting we use a 110 dB echolocation threshold (different frequency of noise), our consultant did a quick analysis of the use of this threshold for the noisiest receptor location (Rosario Strait). We found that there were *more* exceedances of the NMFS 120 dB behavioral threshold than of the alternative proposed 110 dB echolocation threshold. This means that the 120 dB threshold that NMFS recommends, is more ecologically sensitive (more fully captures environmental impacts) for this type of noise, than the 110 dB threshold is. We are keeping the original threshold because it is both the NMFS recommendation and more ecologically sensitive, which is appropriate for the EIS.

- Highest received levels (95<sup>th</sup> percentile) increased by > 3 dB
- Median received levels (50<sup>th</sup> percentile) increased by > 3 dB
- **In-Air Noise:** Chronic and recurring increase in the frequency, severity, and/or extent of in-air noise threshold exceedances at sensitive receptor locations.

**Summary of Mitigation Included in the EIS**

In the EIS, we propose the following mitigation measures related to underwater noise:

**Required Mitigation (Rulemaking or other Existing Regulations):**

- In rulemaking language: Selection of geographic alternatives and functional and operational requirements may affect underwater noise impacts, operators must consider opportunities to participate in voluntary underwater noise reduction efforts to avoid/reduce impacts.
- In other regulations: Continued adherence to existing federal and state regulations protecting SRKW and other marine mammals including but not limited to reducing speed and maintaining distance from SRKW (detailed list in Plants and Animals Section).

**Proposed Mitigation (Voluntary or Suggested):**

- Encourage continued participation in voluntary slow downs (e.g. ECHO Program, Quiet Sound), which have been shown to reduce underwater noise.
- Encourage operators to continue to follow the Puget Sound Harbor Safety Committee Harbor Safety Plan Standards of Care and other industry best practices.
- Encourage consideration of transition to hybrid electric propulsion and fully electric propulsion in the long-term as technological readiness and cost increase the feasibility of these technologies.

Table 2. Modeled receiver locations and rationale for their selection.

Receiver location	Rationale for Selection
1 – SoG	Near proposed expansion area and a SRKW hotspot
2 – Boundary	Near proposed expansion area and area frequented by SRKW, humpback whales and harbor porpoises
3 – Lummi	Near proposed expansion area
4 – Anacortes	Close to a moderate amount of target tug traffic and an area frequented by SRKW and harbor porpoises
5 – Rosario	Close to a moderate amount of target tug traffic and an area frequented by SRKW and harbor porpoises
6 – Haro	A hotspot for SRKW and humpback whales
7 – Puget	Close to current target tug route and an area frequented by SRKW, humpback, and gray whales



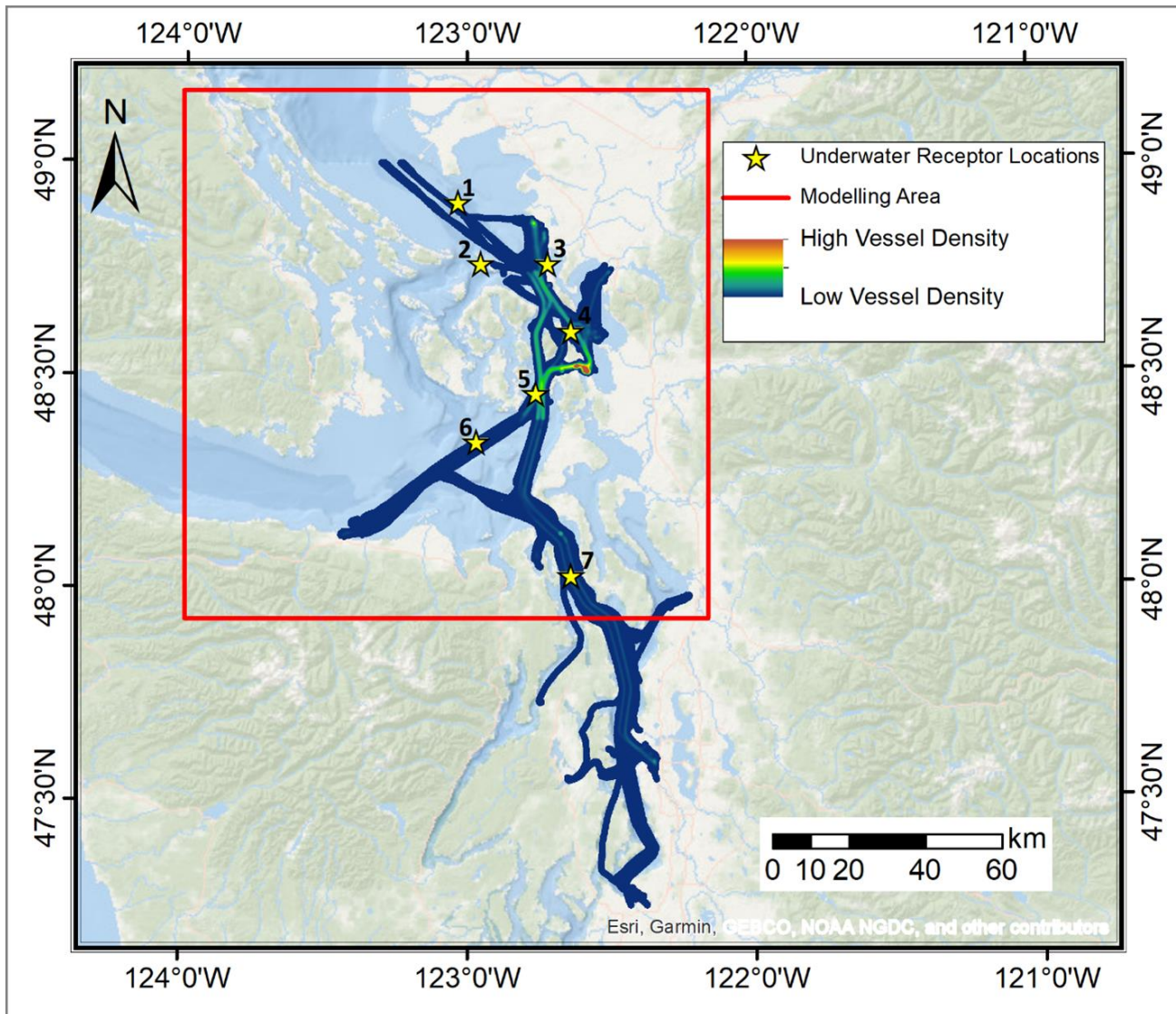


Figure 2. Modeled receiver locations selected for their biological sensitivity.



Haley Kennard  
Haley.Kennard@ecy.wa.gov  
564-233-5178



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# Tug Escort EIS – Vessel Traffic



Figure 1. A tanker with an escort tug providing escort services

**Draft information only. Please do not share. Information subject to change prior to DEIS publication.**

## Overview

This document summarizes impacts to vessel traffic that could result from the rulemaking alternatives as assessed in the Environmental Impact Statement (EIS). **We found no significant and unavoidable adverse impacts to vessel traffic for any of the alternatives.** Impacts of vessel traffic on other elements of the EIS (recreation, Tribal resources, etc.) are summarized in those sections.

## Significance Findings/Overall Summary

A summary of the primary findings for each alternative is below. A few points are common across several or all alternatives:

- We estimate that there are 1,537 escort jobs/year (4-5 escort jobs/day) for Alternatives A, B and C. For Alternative D, there are zero escort jobs for target vessels.
- Previous analyses have suggested that some route switching in response to the requirements is possible. Towed barges were observed route switching most frequently.
- We did not identify significant navigational safety or congestion concerns for any alternative.

Table 1. Summary of impacts by alternatives

Alternative	Impacts/Description	Significant?
Alternative A: No Action	<ul style="list-style-type: none"> <li>• 610,107 annual underway minutes</li> <li>• 0.96% of all AIS vessel traffic underway time</li> <li>• Active escort of target vessels is 36.78% of underway time, commuting is 63.22%</li> </ul>	No
Alternative B: Addition of Functional and Operational Requirements	<ul style="list-style-type: none"> <li>• Same as Alternative A</li> <li>• Minor but unquantified increases in safety from FORs</li> <li>• Possible minor shift in commute locations if tugs under 3,000 hp are used less frequently</li> </ul>	No
Alternative C: Expansion	<ul style="list-style-type: none"> <li>• 624,784 annual underway minutes (2.41% increase in underway time over Alternative A)</li> </ul>	No

Alternative	Impacts/Description	Significant?
	<ul style="list-style-type: none"> <li>• 0.99% of all AIS vessel traffic underway time</li> <li>• Active escort of target vessels is 39.26% of underway time, commuting is 60.74%</li> <li>• Northward shift in distribution of traffic, moderate increases in underway time in expansion area, minor decreases in Rosario Strait and Bellingham Channel zones</li> <li>• Tugs waiting for target vessels may be more dispersed at northern end of regulatory area</li> </ul>	
Alternative D: Removal	<ul style="list-style-type: none"> <li>• Eliminates all underway time for target vessel escort tugs</li> <li>• Removal of tug escort requirements for target vessels eliminates 0.96% of all AIS vessel traffic underway time (19% of all escort/assist tug traffic)</li> </ul>	No

**Significance Thresholds Used**

For vessel traffic, we used the following thresholds to make a significance determination. A positive finding for either threshold would result in a finding of significant impact for that alternative.

- Increases in underway time
- Negative consequences for navigational safety and congestion

**Summary of Mitigation Included in the EIS**

In the EIS, we propose the following mitigation measures related to vessel traffic:

**Required Mitigation (Rulemaking or Other Existing Regulations):**

- In rulemaking language: None, beyond the potential minor benefits to vessel traffic safety of including the FORs in rule language.
- In other regulations: Continued adherence to existing federal and state vessel traffic safety regulations.

**Proposed Mitigation (Voluntary or Suggested):**

- Encourage operators to continue to follow the Puget Sound Harbor Safety Committee Harbor Safety Plan Standards of Care and other industry best practices.
- Escort tugs encouraged to reduce waiting times at rendezvous locations as feasible and safe to do so.



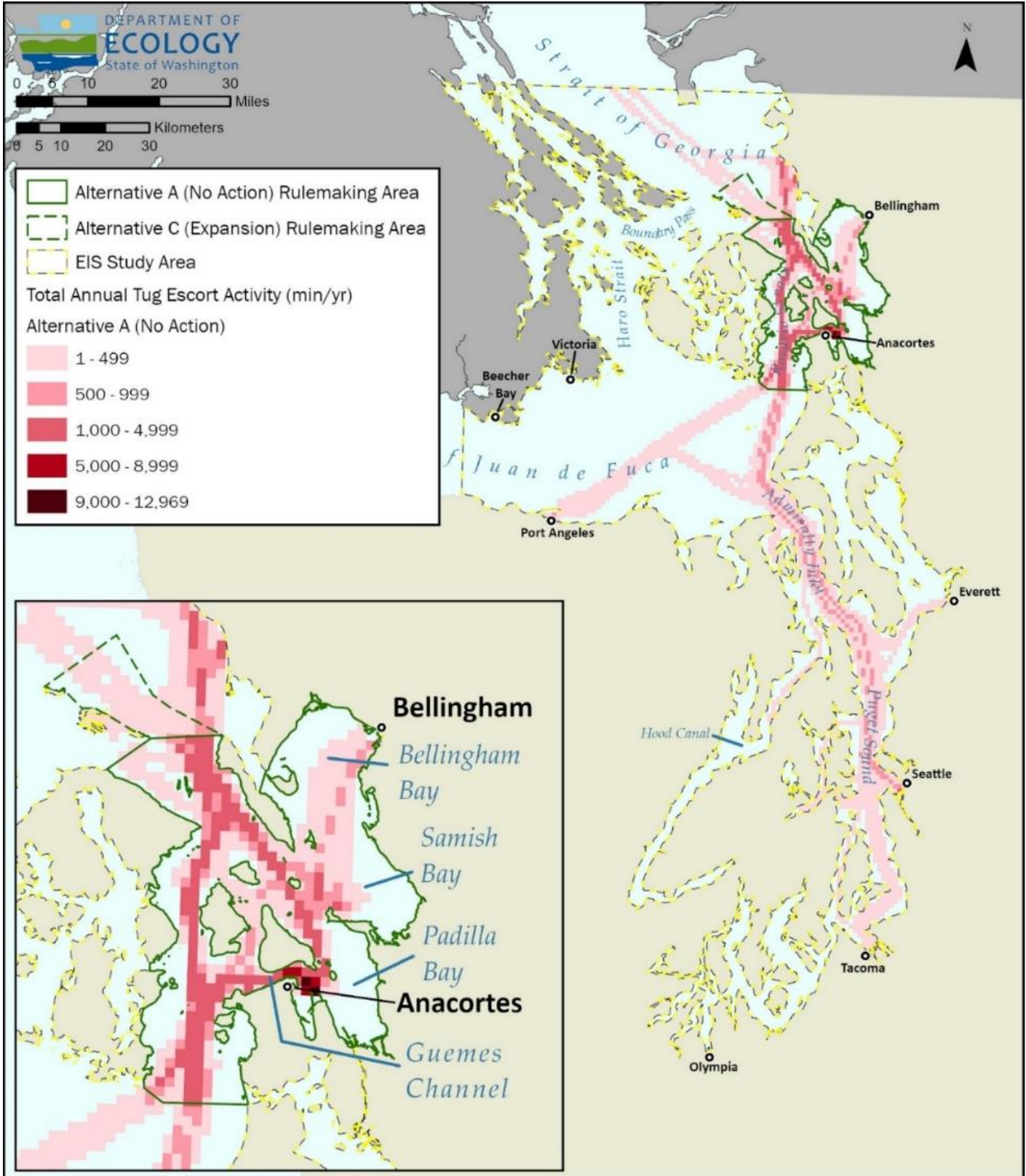


Figure 2. Target vessel escort tug underway time under Alternative A



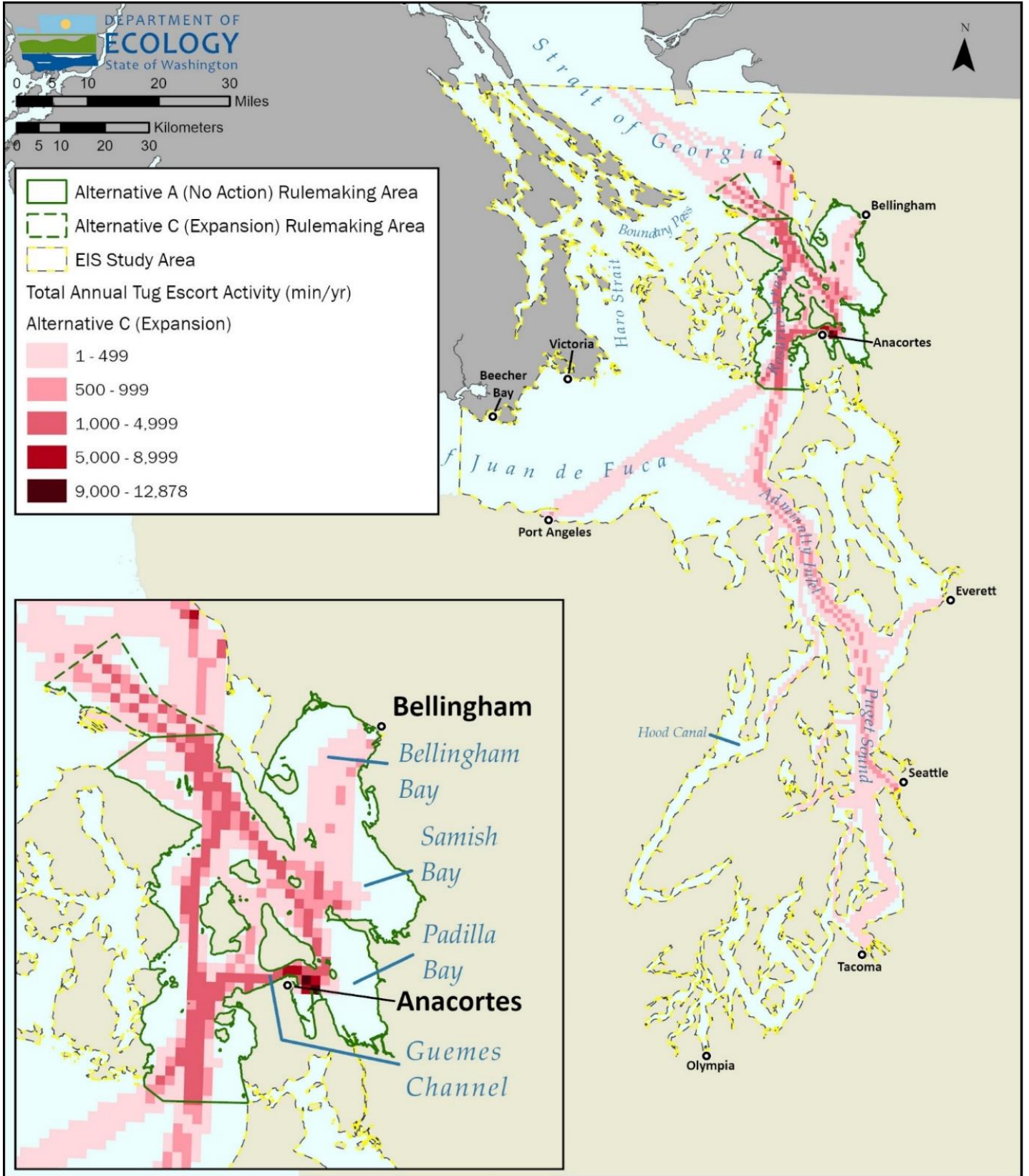


Figure 3. Target vessel escort tug underway time under Alternative C

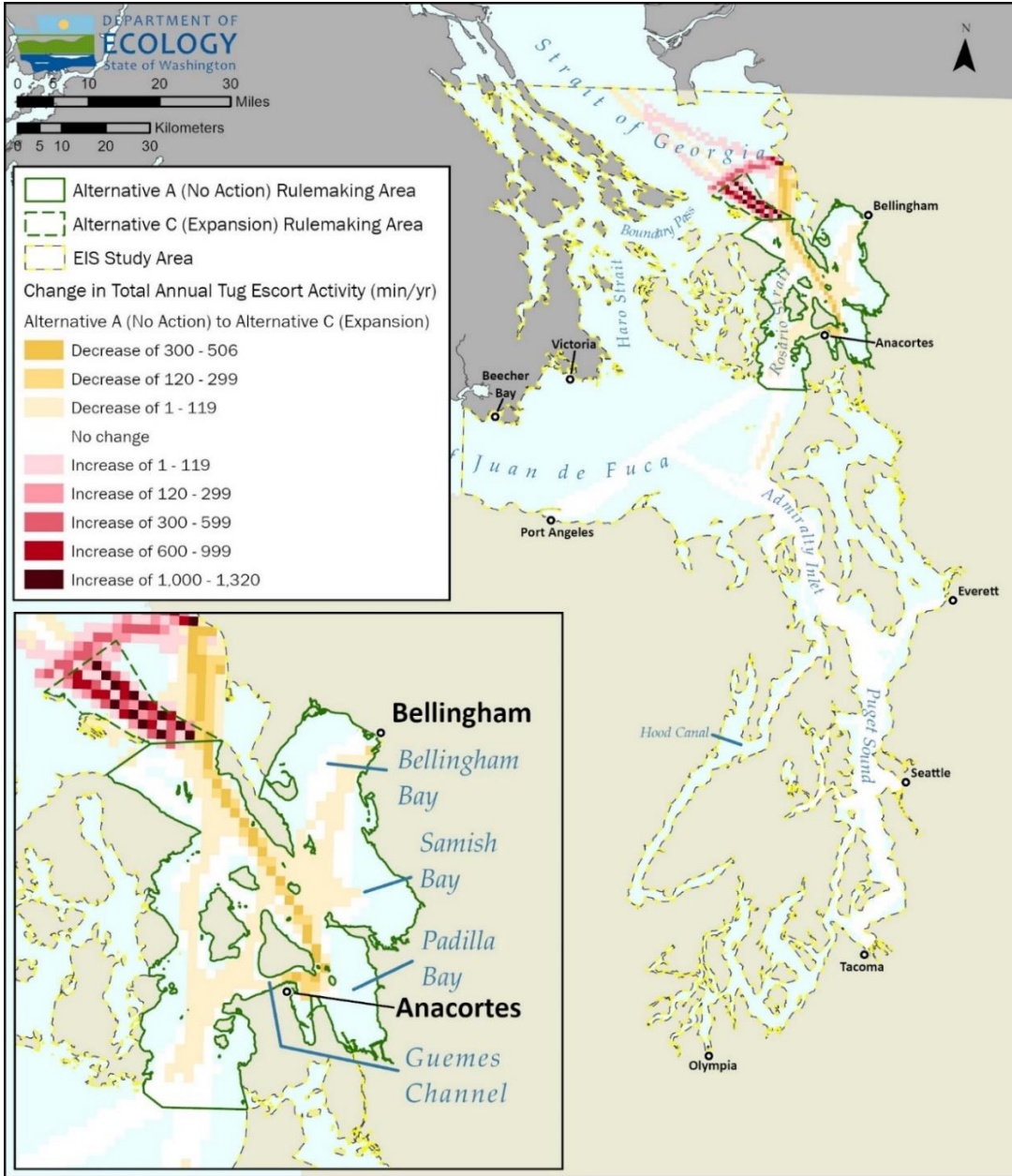


Figure 4. Simulated change in target vessel escort tug underway time between Alternatives A and C



**Haley Kennard**  
 Haley.Kennard@ecy.wa.gov  
 564-233-5178



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## Draft of sample WAC language for February 2025 BPC meeting

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WAC 363 – 116 – 600: Tug escort requirements for tank vessels up to 40,000 DWT.

- (1) Escort requirements in WAC 363 – 116 – 600 do not apply to:
  - (a) vessels providing bunkering or refueling services, as defined by the Board;
  - (b) towed general cargo deck barges; or
  - (c) vessels in ballast or unladen, as defined by the Board.
  
- (2) The following vessel types shall not operate in Rosario Strait and connected waterways to the east unless they are under the escort of a tug with a minimum of twin-screw propulsion:
  - (a) Oil tankers of between five thousand and forty thousand deadweight tons;
  - (b) Articulated tug barges that are designed to transport oil in bulk internal to the hull and greater than five thousand deadweight tons; and
  - (c) Towed waterborne vessels or barges that are designed to transport oil in bulk internal to the hull and greater than five thousand deadweight tons.
  
- (3) Vessels between 5,000 and 18,000 DWT must use an escort tug of 2000 hp to meet the escort requirements in WAC 363 – 116 – 600(2).
  
- (4) Vessels over 18,000 DWT must use an escort tug with a minimum of 3000 hp to meet the escort requirements in WAC 363 – 116 – 600(2).
  
- (5) Before commencing an escort required in WAC 363 – 116 – 600, the escorted vessel officer in charge shall hold a pre-escort conference to confer with the escort vessel officer in charge and the pilot (if applicable) to discuss and agree upon the operational details of the transit. The pre-escort conference must be recorded in the logbooks of the participating vessels and must include discussion of the following topics:
  - (a) Safety
    - (i) Safety of tug and escorted vessel personnel
    - (ii) safe working load of the deck fittings on the escorted vessel;
  - (b) Navigation
    - (i) anticipated route and destination;
    - (ii) anticipated speeds along the transit;
    - (iii) review status of active tribal fisheries in relation to planned route and speed;
    - (iv) location and approximate time of the escorted transit beginning and end;
    - (v) anticipated weather and state of tides, currents, sea-state and anticipated traffic;
  - (c) Operations
    - (i) operational status of each vessel and their equipment including any limitations such as speed;
    - (ii) propulsion type and maximum direct bollard pull of the escort tug;
    - (iii) primary and secondary means of communication (i.e. VHF channels);
    - (iv) availability of appropriate crewmembers and their roles when responding to an emergency;

- (v) relative position, direction of travel and tethering locations of the escort tug(s) while on transit;
- (vi) method of connection of the escort tug to the tank vessel in an emergency or if tethering (i.e. tugs line, pennant, messenger lines etc.);
- (vii) Whether any training or escort exercise will be performed during the transit; and
- (viii) Any other items to ensure that the escort transit is conducted in such a way that in the event of a failure or emergency the tank vessel can be kept under control within the limits of the available channel.

DRAFT



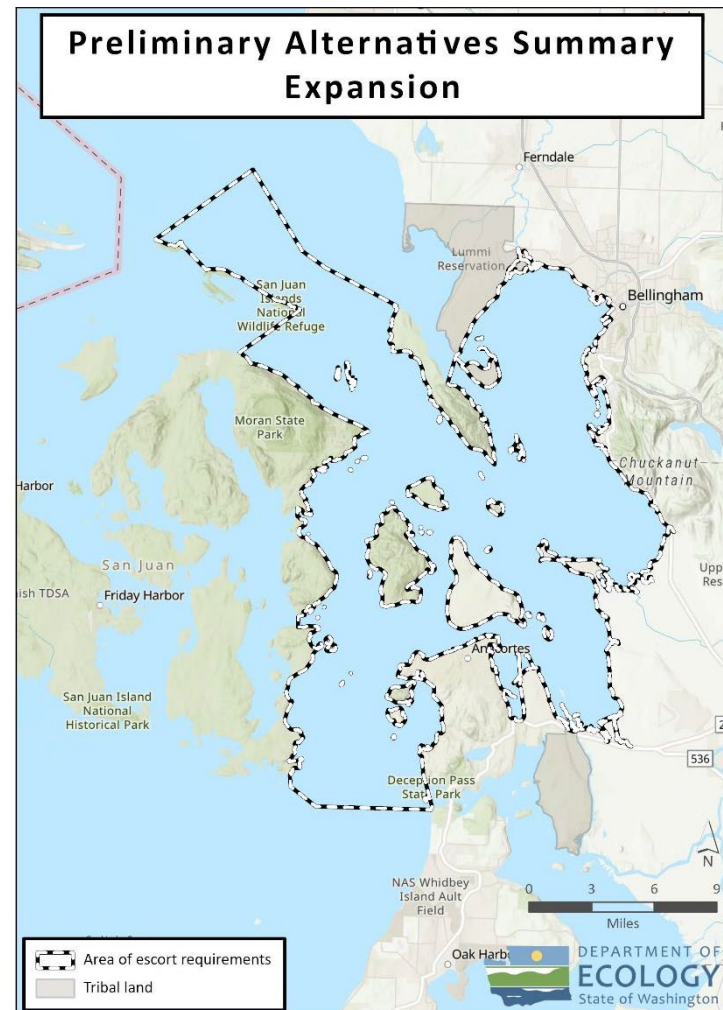
## OTSC Recommendation to the BPC on the Tug Escort Rulemaking – February 2025

The OTSC developed this draft recommendation to the BPC during the OTSC meeting for Workshop 11, on February 13, 2025. The OTSC recommendation is framed in terms of the following rule components:

- functional and operational requirements,
- geographic escort area, and
- mitigation measures.

The Alternative that aligns with the functional and operational requirements and escort area recommended by the OTSC is Alternative C, the expansion area alternative.

The details of the OTSC recommendation, their rationale, and dissenting opinions are summarized in the table.



Rule Component	OTSC Recommendation	OTSC Rationale	Dissenting opinions
Functional and Operational Requirements	<ul style="list-style-type: none"> <li>• Minimum of twin-screw propulsion.</li> <li>• Pre-escort conference (see draft WAC language sample).</li> <li>• Vessels between 5,000 and 18,000 DWT must use an escort tug of 2000 hp.</li> <li>• Vessels over 18,000 DWT must use an escort tug with a minimum of 3000 hp .</li> </ul>	<ul style="list-style-type: none"> <li>• Ensures escort tug will have sufficient power and maneuverability to successfully intervene to prevent a drift grounding and subsequent spill.</li> <li>• Ensures both vessels have a shared understanding of key elements of the escort operation.</li> <li>• Support for mentioning active fisheries in pre-escort conference to help mitigate impact to tribal resources.</li> </ul>	<ul style="list-style-type: none"> <li>• None</li> </ul>
Geographic escort area	<ul style="list-style-type: none"> <li>• Rosario Strait and connected waterways to the east and expansion area</li> </ul>	<ul style="list-style-type: none"> <li>• This area is adjacent to the Rosario and waters east escort area. The Ecology model showed this area to have a high escort efficiency, and the OTSC agreed that the characteristics of this zone make it a good candidate for an escort requirement.</li> <li>• This is an escorted area for 40,000 DWT and larger vessels and is a high risk area due to high current, reefs, and other navigational hazards.</li> <li>• Escorts in this area could also have a Canadian benefit</li> </ul>	<ul style="list-style-type: none"> <li>• Comment – the expansion area may influence Canadian operators in their route selection</li> <li>• Oil Industry prefers Alternative B due to their review of the impacts and costs</li> </ul>

Rule Component	OTSC Recommendation	OTSC Rationale	Dissenting comments
Mitigation Measures (to be included in rule language)	<p><b>In progress with OTSC.</b> In general, the OTSC did not want to pursue including the standalone language in the WAC as presented by the rule team. For reference, the WAC language proposed by the rule team was:</p> <p>Vessels required to take escorts must:</p> <ul style="list-style-type: none"> <li>• Consider opportunities to coordinate with interested Tribes to avoid or reduce impacts of tugs to treaty fishing and</li> <li>• Consider opportunities to participate in voluntary underwater noise reduction measures and best practices where safe and feasible to do so.</li> </ul> <p>Some OTSC members suggested including fisheries awareness measures in the pre-escort conference language instead (see draft WAC language sample).</p>	<ul style="list-style-type: none"> <li>• OTSC members advised against using 'consideration' language in the WAC.</li> </ul>	<ul style="list-style-type: none"> <li>• Including WAC language about considering opportunities for coordination with tribes and to reduce underwater noise is helpful to include to elevate awareness of these best practices.</li> </ul>
Mitigation Measures (voluntary – not included in WAC language)	<ul style="list-style-type: none"> <li>• In progress with the OTSC – will develop during their March meeting and will provide when available</li> </ul>		



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**Meeting Minutes – Pilot Safety Committee (PSC)**

November 7, 2024, 10:00 AM

**Attendees:** Andrew Drennen (BPC), John Scragg (PSP), Ryan Leo (PGH), Sheri Tonn (BPC), Jaimie Bever (BPC), Jason Hamilton (BPC); Mike Moore (PMSA), Scott Anacker (PSP), Ivan Carlson (PSP), Scott Brewen (PSP), Bettina Maki (BPC)

**Regrets:** Eleanor Kirtley (BPC)

**1. Review of Minutes of previous meeting on August 12.**

The minutes were approved with minor edits.

**2. Rest Rule Exceptions**

During 2024 Q3 in Grays Harbor there were zero (0) rest exceptions.

During 2024 Q3 in Puget Sound there were two (2) exceptions to the 10 hour rest rule related to pilot boat leaving the float too early. There was (1) exception to the 13 hour rest rule.

**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.

There were two reports where pilots fell near the side pilot port when disembarking. One was a slip hazard (painted surface was slippery), and one was a trip hazard (D-ring was not highlighted with paint). The slipping hazard resulted in pilot injuries and will be counted in the BPC KPI for pilot injury associated with unsafe transfer arrangement. It was clarified that injuries reported on either PTA reports OR incident reports can be counted in the KPI. There was discussion of adding an injury checkbox to the PTA reporting form.

Ivan Carlson and Scott Anacker discussed the gangway at Pier 86. It leads to a tarp surface (designed to prevent material from falling in the water) that is marked "DO NOT STEP" although workers routinely walk on it. There is a brow that can bridge the tarp area but it is rarely rigged. Pilots are using Arrow Launch to avoid this dangerous gangway arrangement and working with Pier 86 to find a permanent solution to the dangerous boarding/disembarking area.

Scott Anacker reported on the annual IMPA pilot ladder survey. The opt-in survey continues to show a 20% rate of noncompliant transfer arrangements. The survey's primary purpose is pilot awareness.



#### **4. Engine Limiters**

John Scragg did a deep dive on the new USCG engine limiter guidance to determine if any changes were needed to PSP procedures around engine limiters. He determined that no changes are needed to the letter drafted last year outlining the information PSP dispatchers require from agents:

- a. Is the vessel equipped with an engine or shaft power limiter?  
If yes, is the limiter mechanical or electronic?*
- b. If so equipped, will the vessel's EPL be disabled for the pilotage transit?*
- c. If not disabled, what is the time required to disable the EPL?*

#### **5. MSO Form Revisions**

PSP has requested that the BPC MSO form be converted to an online form as part of the MSO form revision (similar to the PSP's pilot transfer arrangement form that uses the Jotform platform) and BPC has agreed to create a Jotform version of the MSO form. This will require more time and the revised MSO form will not be ready for Pilot Safety Committee review until 2025.

#### **6. MOB Drill – Columbia River Bar Pilots**

Ryan Leo and Scott Anacker were invited to attend the semiannual joint MOB drill between Columbia River Bar Pilots and the USCG. They remarked on the benefits of the exchange of knowledge between the three different pilot groups. Ryan is working with the various parties in Grays Harbor to adopt a regular training regime.

Grays Harbor has upgraded their PLBs to the ACR 450. Ryan described that one of the beacons was accidentally set off, and the Coast Guard had very quick reaction time. Scott Anacker would like PSP to do a joint drill involving USCG and Arrow Launch.

Both Grays Harbor and PSP would like to implement Quick Response Cards for procedures, similar to what is used by Columbia River Bar Pilots.

#### **7. Adjournment/Next Meeting**

The committee agreed to schedule the next meeting during the first week of February 2025 and Bettina will send a scheduling poll to determine the best time on either Tuesday or Thursday of that week. The February meeting will feature discussion of PSP comp days.

The meeting was adjourned at 11:10am.

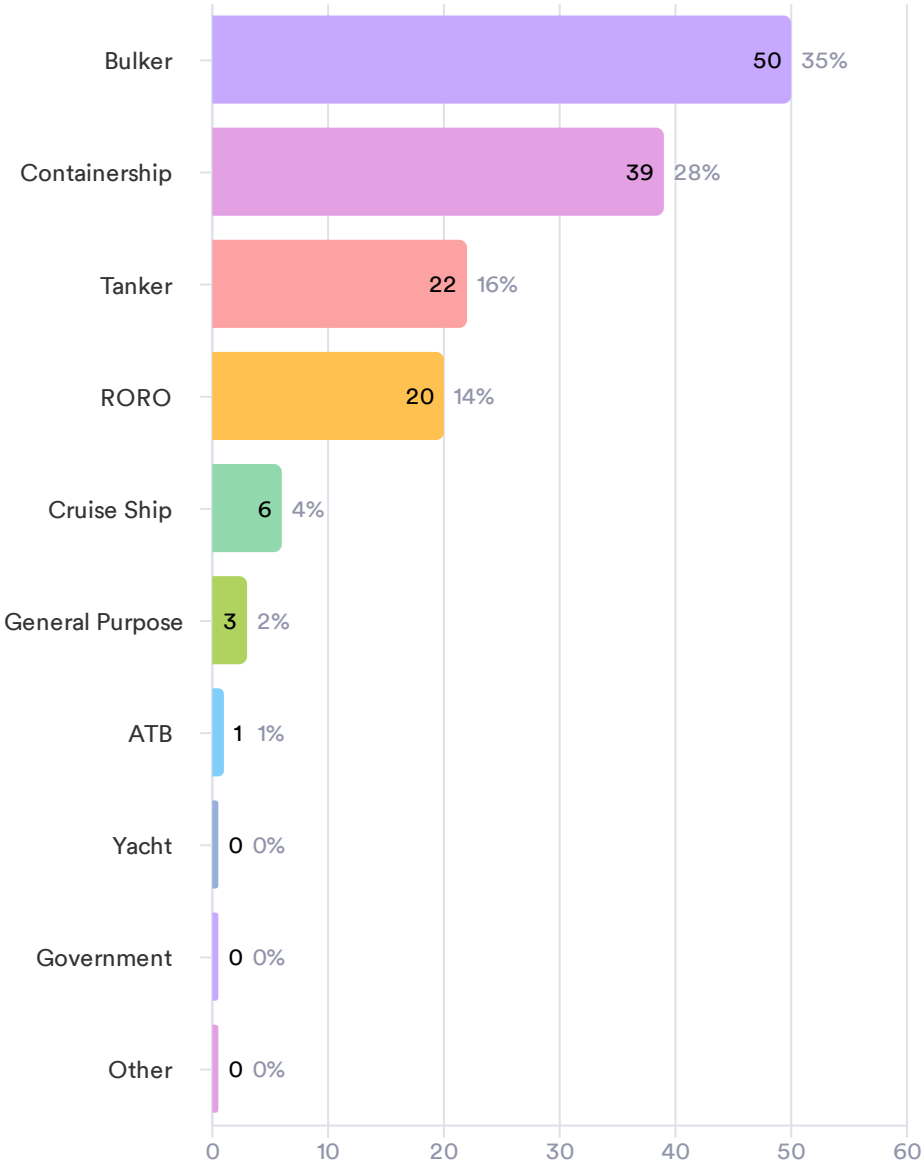
# Pilot Ladder Safety Summary

Washington State (PS & GH 1/1/24 - 12/31/24)

# Pilot Ladder Safety Report

## Vessel Type:

141 Responses



## Vessel Name:

141 Responses

Data	Responses
Louisiana	3
Liberty King	3
Carnival Spirit	3
American Endurance	2
MOL Premium	2
Ren Jian 20	2
Dylan	2
MSC Alanya	2
Iron Maiden	2
MSC Vilda X	2
Niriis	2
Cosmic Ace	2
Liberty Pride	2
CL Sheena	2

# Pilot Ladder Safety Report

## Flag State:

141 Responses

Data	Responses
LBR	26
PAN	22
MHL	20
USA	16
HKG	16
SGP	9
BHS	9
CHN	5
MLT	3
GBR	3
PRT	2
Other entries	10

## Classification Society:

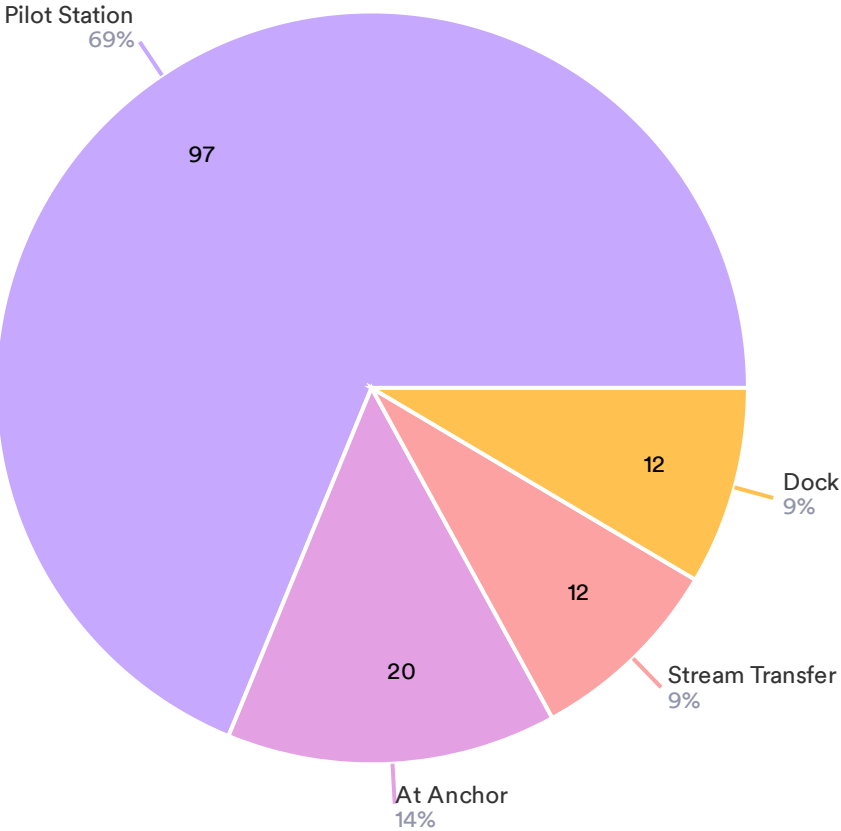
58 Responses

Data	Responses
NK	18
ABS	18
LR	5
CCS	4
DNV	4
BV	3
KR	2
RINA	2
NS	1
DNV-GL	1

# Pilot Ladder Safety Report

## Geographic Location:

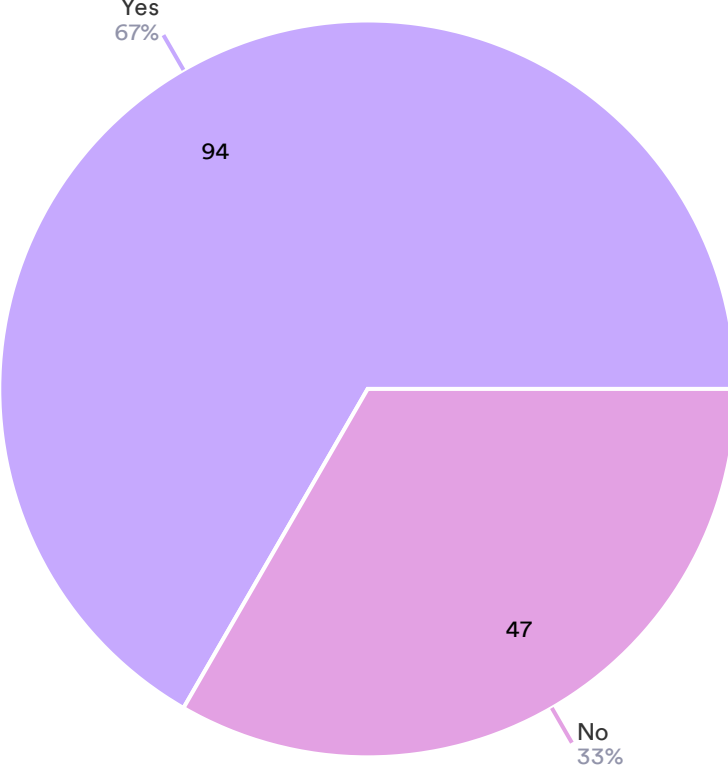
141 Responses



Pilot Station At Anchor Stream Transfer Dock

## Master Notified:

141 Responses

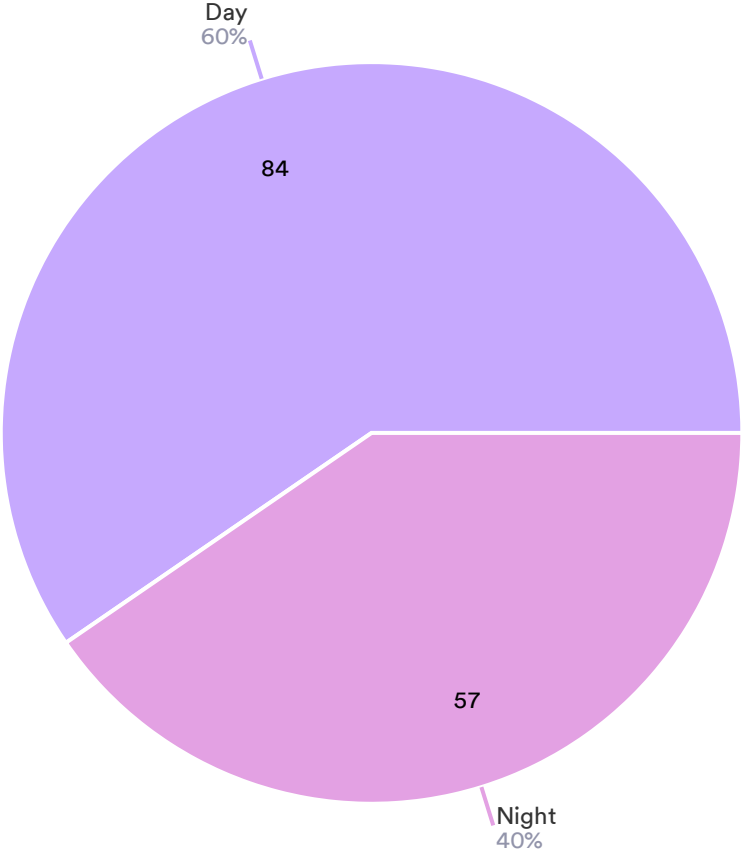


Yes No

# Pilot Ladder Safety Report

## Day/Night:

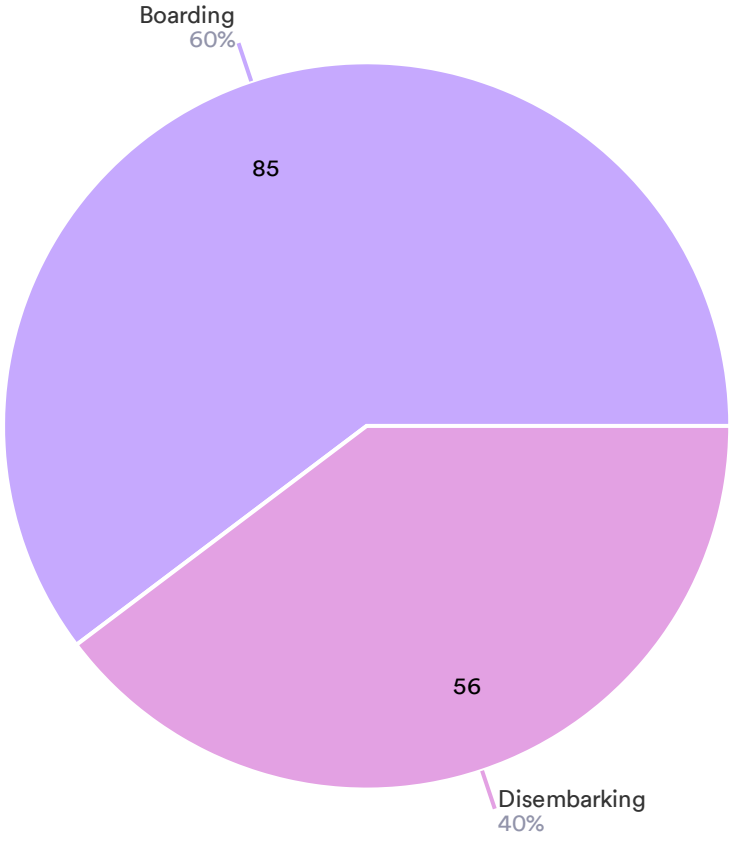
141 Responses



● Day ● Night

## Boarding/Disembarking:

141 Responses

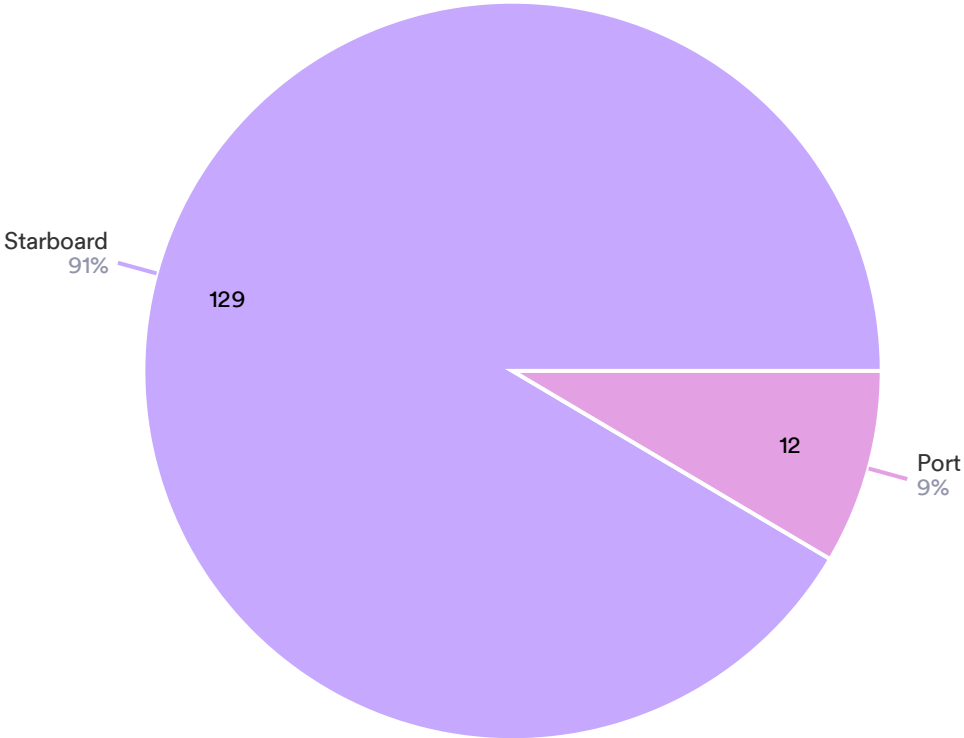


● Boarding ● Disembarking

# Pilot Ladder Safety Report

## Port/Starboard:

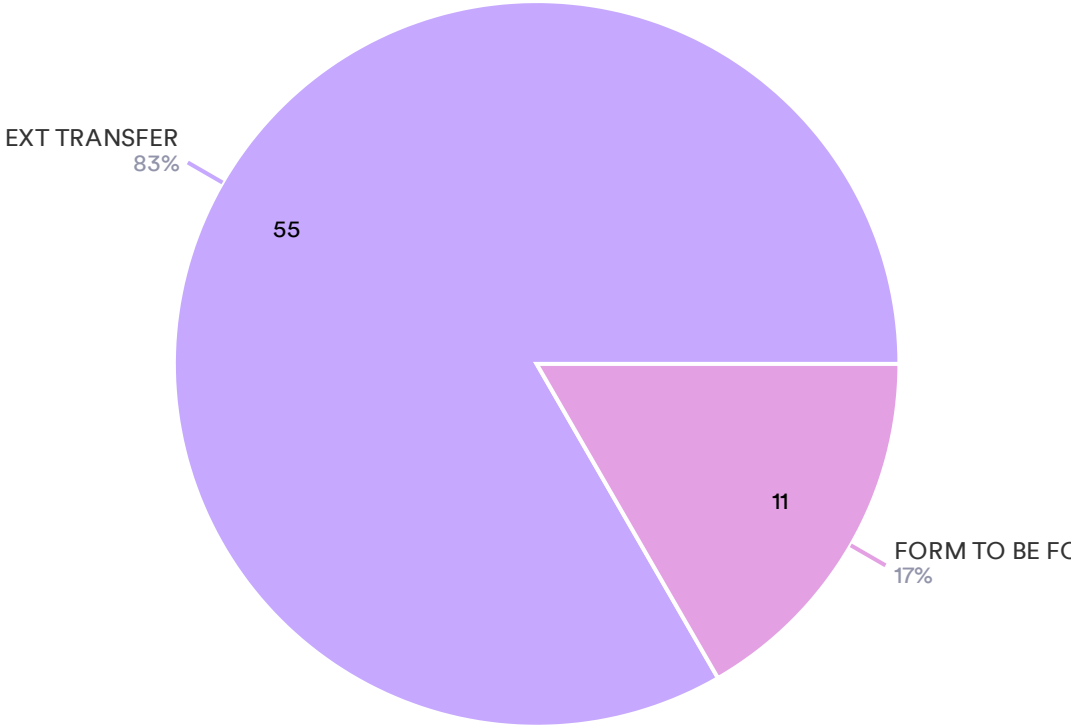
141 Responses



● Starboard ● Port

## Notification:

66 Responses

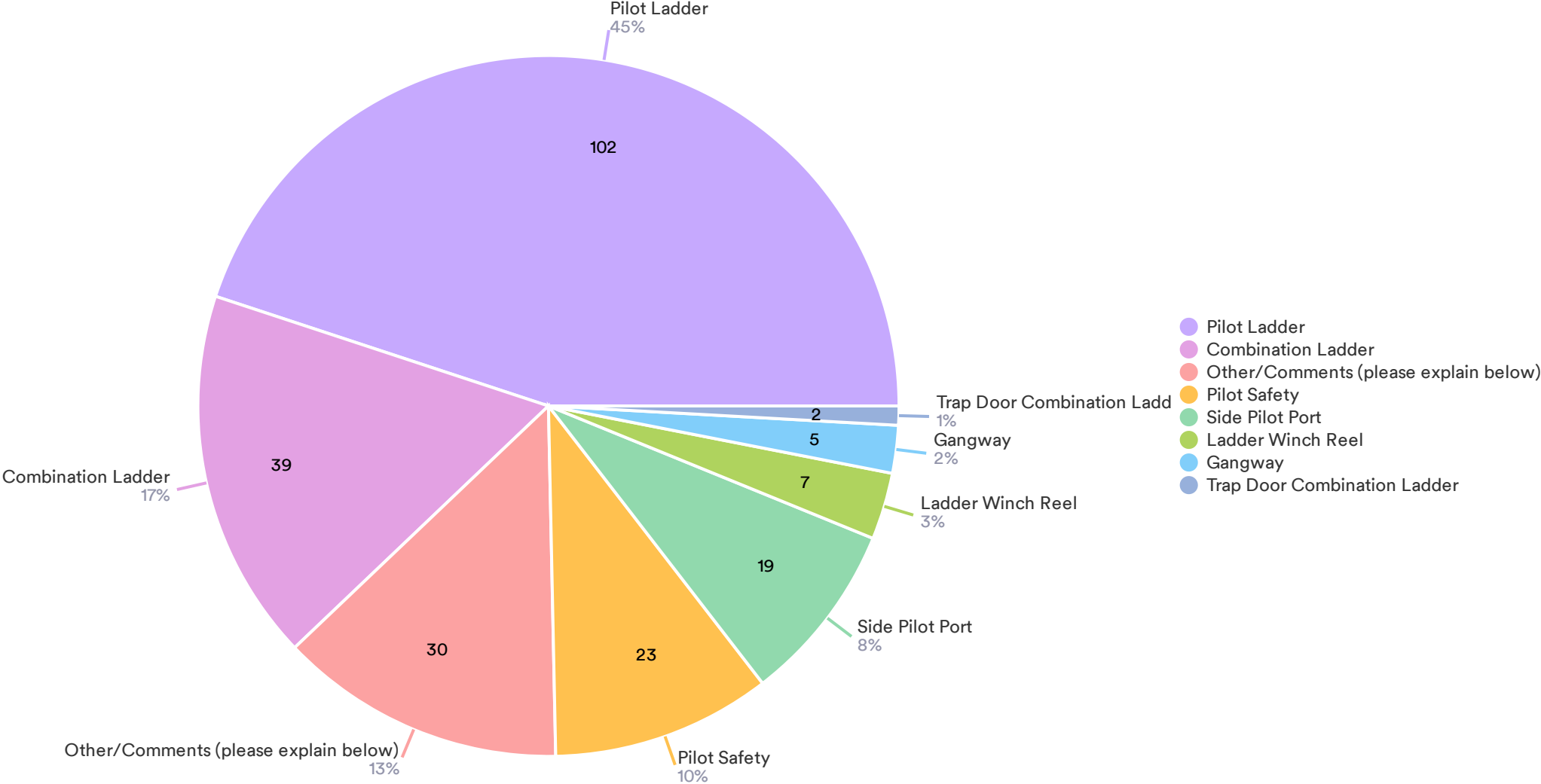


● MUST BE CORRECTED PRIOR TO SAILING OR NEXT TRANSFER  
● FORM TO BE FORWARDED TO NEXT PORT

# Pilot Ladder Safety Report

## Non-Compliance:

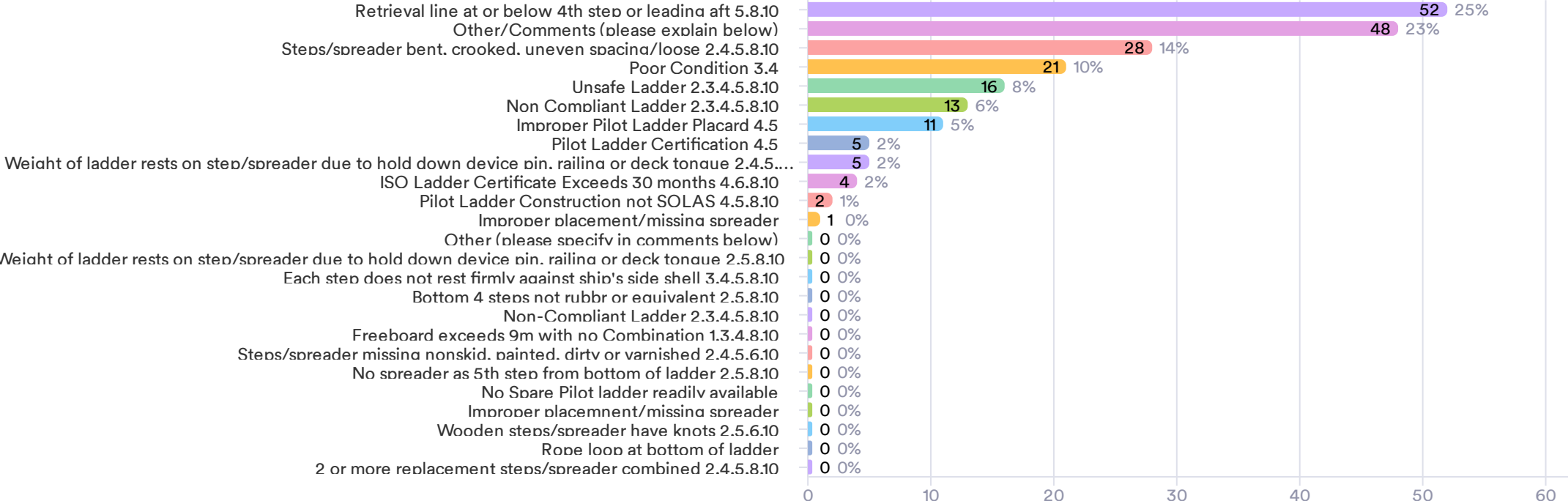
227 Responses



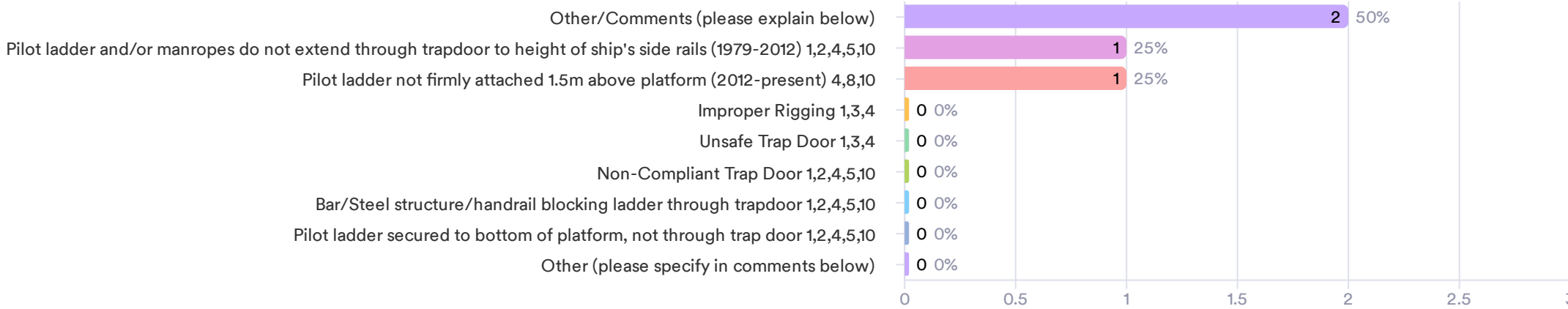


# Pilot Ladder Safety Report

## Pilot Ladder:

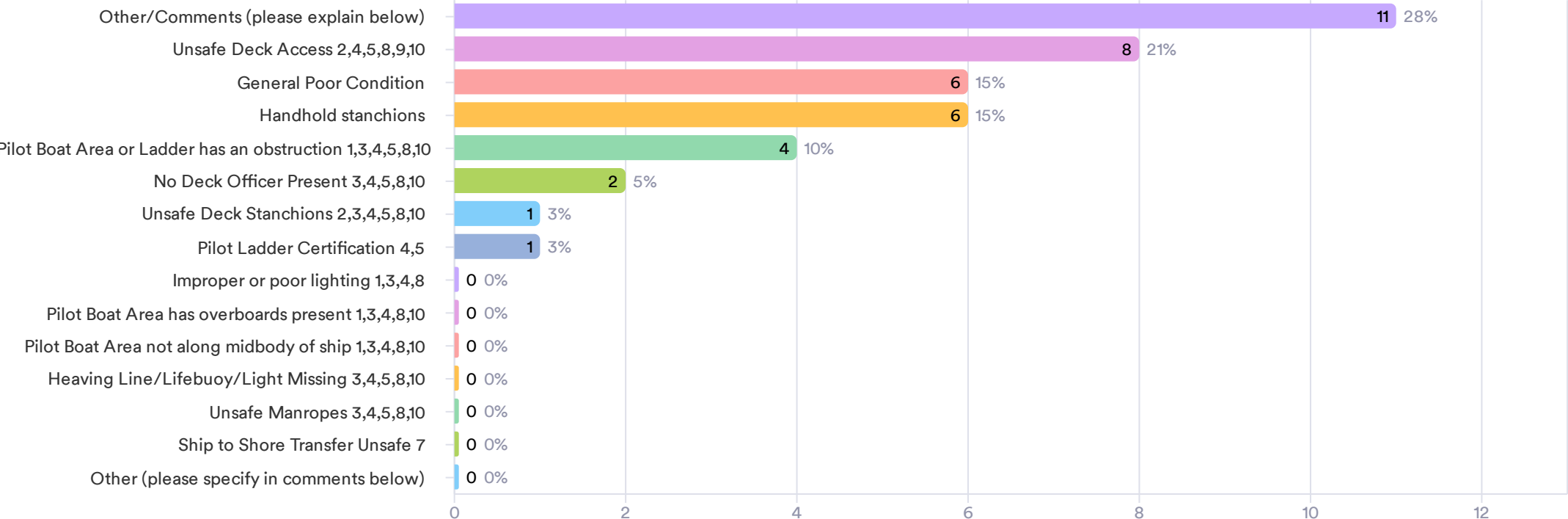


## Trap Door Combination Ladder:

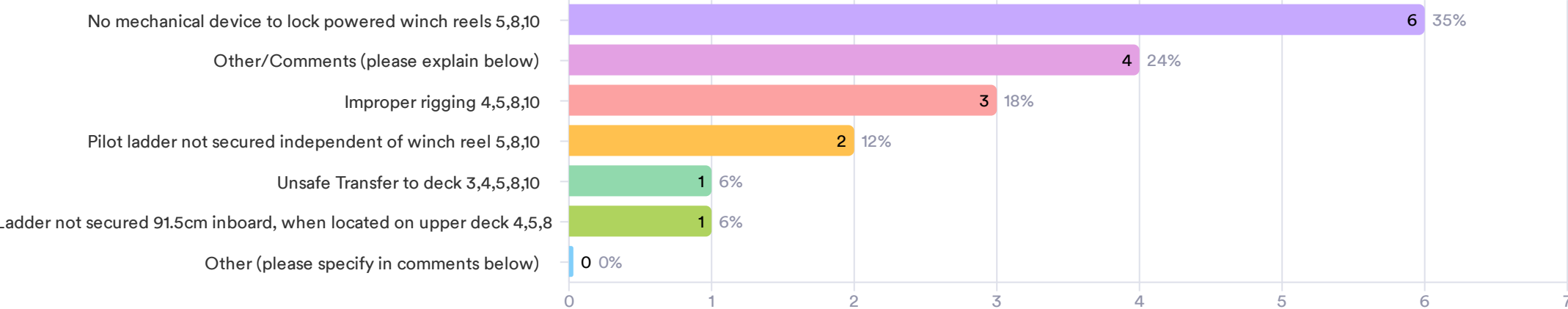


# Pilot Ladder Safety Report

## Pilot Safety:

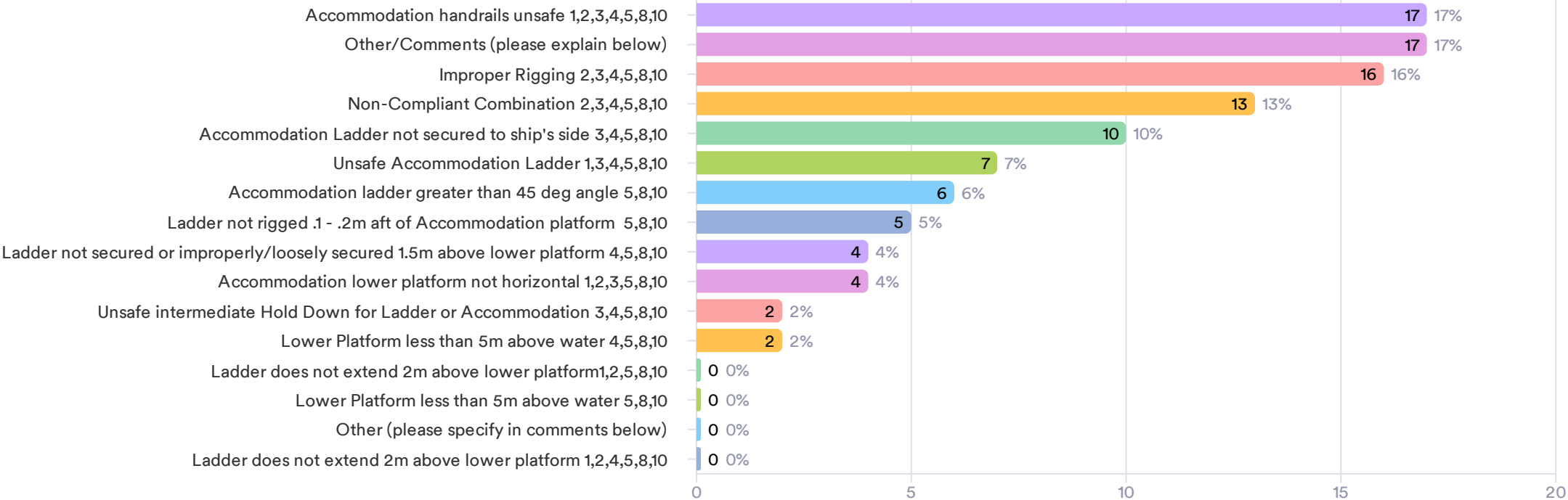


## Ladder Winch Reel:

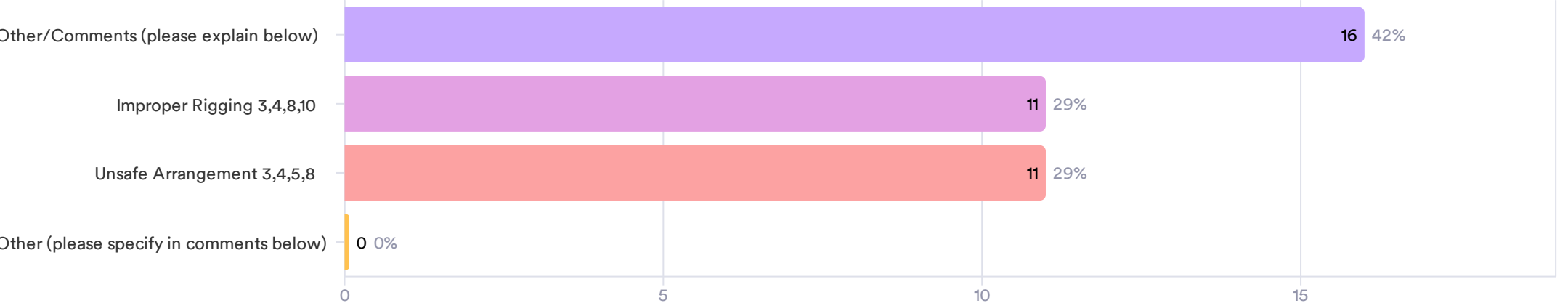


# Pilot Ladder Safety Report

## Combination Ladder:



## Side Pilot Port:





STATE OF WASHINGTON  
**BOARD OF PILOTAGE COMMISSIONERS**  
2901 Third Avenue, Suite 500 | Seattle, Washington 98121 | (206) 515-3904

[www.pilotage.wa.gov](http://www.pilotage.wa.gov)  
[HamelJ@wsdot.wa.gov](mailto:HamelJ@wsdot.wa.gov) or [BeverJ@wsdot.wa.gov](mailto:BeverJ@wsdot.wa.gov)

## PETITION FOR 1 YEAR PILOTAGE EXEMPTION

### Petition Instructions:

1. **Please submit completed petitions to the Board of Pilotage Commissioners at least thirty (30) days prior to arrival in Washington waters.**

See [WAC 363-116-360 Exempt Vessels](#) for more information.

2. Your application should include the following:

- Certificate of Vessel Registry
- Certificate of Financial Responsibility (If applicable)
- Vessel's Insurance Coverage
- Valid License of Vessel Captain
- Signed Vessel Certification (Page 5 of Petition)
- Photo of Vessel
- Asian Gypsy Moth (AGM) Certification (If applicable)

3. Petitions are considered at scheduled monthly meetings of the Board of Pilotage Commissioners. Meeting schedule is posted here: <https://pilotage.wa.gov/meetings.html>

4. Schedule of Fees:

YACHT 1300 GT or less	1 YR EXEMPTION	ANNUAL RENEWAL
65' and Under	\$ 100	\$ 100
66' to 125'	\$ 1100	\$ 900
126' to 200'	\$ 1500	\$ 1400

PASSENGER VESSEL 1300 GT or Less	1 YR EXEMPTION	ANNUAL RENEWAL
All passenger vessels up to 200'	\$ 1500	\$ 1500

Please make payments to: *Washington State Treasurer*

Mail to: Board of Pilotage Commissioners, 2901 Third Avenue, Suite 500; Seattle, WA 98121

**Currently, we are unable to accept cash, credit cards, or any form of electronic payment.**

The Washington Public Records Act, [Chapter 42.56 RCW](#), requires us to promptly make identifiable public records available for inspection and provide records upon request.

**VESSEL NAME:** \_\_\_\_\_

**START DATE OF REQUESTED PILOTAGE EXEMPTION:** \_\_\_\_\_

**Vessel Information:**

<b>Vessel Name:</b>	
<b>Country of Registry:</b>	
<b>Type and Use:</b>	<b>Type:</b> <input type="checkbox"/> Sailing Yacht <input type="checkbox"/> Motor Yacht <input type="checkbox"/> Passenger Vessel <b>Use:</b> <input type="checkbox"/> Pleasure <input type="checkbox"/> Other _____
<b>LOA:</b>	
<b>Gross Tonnage (International) IGT:</b>	
<b>Fuel Type Onboard:</b>	
<b>Fuel Quantity Onboard: (maximum)</b>	

**Primary Vessel Captain:**

<b>Name:</b>	
<b>Address:</b>	
<b>Phone &amp; Email:</b>	
<b>Country Of Licensure:</b>	<input type="checkbox"/> License Matches Vessel Tonnage. If not, please explain:

**Primary Vessel Captain Experience in Local Waters:**

<b>No experience in Washington waters</b>  <b>San Juan Islands Region</b> <b>Length of Time in the Area:</b> _____	<b>Northern Puget Sound:</b> Bellingham Channel Deception Pass Guemes Channel Saddle Bags Pass <b>Length of Time in the Area:</b> _____	<b>Seattle Area:</b> Duwamish River Hiram M. Chittenden Locks Montlake Cut <b>Length of Time in the Area:</b> _____
	<b>Central Puget Sound:</b> Agate Pass Hood Canal Rich Pass <b>Length of Time in the Area:</b> _____	<b>South Puget Sound:</b> South of Point Defiance <b>Length of Time in the Area:</b> _____

**Secondary Vessel Captain:**

<b>Name:</b>	
<b>Address:</b>	
<b>Phone &amp; Email:</b>	
<b>Country of Licensure:</b>	<input type="checkbox"/> License Matches Vessel Tonnage. If not, please explain:

**Secondary Vessel Captain Experience in Local Waters:**

<p><b>No experience in Washington Waters</b></p> <p><b>San Juan Islands Region:</b> Length of Time in the Area: _____</p>	<p><b>Northern Puget Sound:</b> Bellingham Channel Deception Pass Guemes Channel Saddle Bags Pass</p> <p><b>Length of Time in the Area:</b> _____</p>	<p><b>Seattle Area:</b> Duwamish River Hiram M. Chittenden Locks Montlake Cut</p> <p><b>Length of Time in the Area:</b> _____</p>
	<p><b>Central Puget Sound:</b> Agate Pass Hood Canal Rich Pass</p> <p><b>Length of Time in the Area:</b> _____</p>	<p><b>South Puget Sound:</b> South of Point Defiance</p> <p><b>Length of Time in the Area:</b> _____</p>

**Owner of Vessel or Vessel Management Company:**

<b>Name:</b>	
<b>Address:</b>	
<b>Phone and Email:</b>	
<b>Vessel Agent Info (If Applicable):</b>	

**Information Regarding Visit:**

<b>Purpose of Visit:</b>	
<b>Length of Stay:</b>	

**Voyage Plan (Check all regions/channels/passes you intend to visit):**

<p><b>San Juan Islands Region:</b>                  Cattle Pass                  Harney Channel                  Lopez Pass                  New Channel                  Obstruction Pass                  Peavine Pass                  San Juan Channel                  Spieden Channel                  Thatcher Pass                  Upright Channel                  Wasp Pass</p>	<p><b>Northern Puget Sound:</b>                  Bellingham Channel                  Deception Pass*                  Guemes Channel                  Saddle Bags Pass</p> <p><b>Central Puget Sound:</b>                  Agate Pass                  Hood Canal                  Rich Pass</p>	<p><b>Seattle Area:</b>                  Duwamish River*                  Hiram M. Chittenden (Ballard) Locks*                  Montlake Cut</p> <p><b>South Puget Sound:</b>                  South of Point Defiance</p> <p><b>Other:</b>                  Please provide location if not listed:</p>
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Please provide specific dates intending to be in area:

\*Deception Pass, Ballard Locks, Duwamish River are Restricted Areas. **MUST COMPLETE PAGE 6** if voyage plan includes these areas .

**Watchstanding Crew List:** (May attach a separate list but must include the information requested below)

<b>1 Name:</b>		<b>2 Name:</b>	
<b>Position:</b>		<b>Position:</b>	
<b>Speaks English:</b>	Yes      No	<b>Speaks English:</b>	Yes      No
<b>3 Name:</b>		<b>4 Name:</b>	
<b>Position:</b>		<b>Position:</b>	
<b>Speaks English:</b>	Yes      No	<b>Speaks English:</b>	Yes      No

**Additional Information:**

<b>List any propulsion, navigation, or communication equipment not currently operational:</b>	
<b>Navigational aids on board:</b>	VHF Radios Magnetic compass Gyroscopic compass Satellite compass Radar Automatic radar plotting aid (ARPA) Global Positioning System (GPS) Electronic Chart System (ECS) Electronic Chart Display & Information System (ECDIS) Automated Identification System (AIS) Depth sounder

# CERTIFICATION

**Vessel Name:** \_\_\_\_\_

By my signature below I certify that I am authorized to make this application on behalf of the vessel named; that the person(s) listed as captain(s) in the Petition for Exemption meets/meet all the qualifications set by the flag state (country of vessel registry) to act as captain of the vessel in Washington waters; and that no other person(s) will act as captain of the vessel during the period of the exemption. I further certify that I understand and will ensure that any person acting as captain of the vessel understands the following:

1. Navigation in Washington waters in the Puget Sound or Grays Harbor Pilotage Districts area can involve many hazards such as high traffic areas including large commercial vessels, multiple recreational vessels, etc.; use of Vessel Traffic Service routes; unique radio communication requirements and channels; relatively extreme tides and currents, etc.
2. If an exemption is granted, prior to navigating in Washington pilotage waters, appropriate navigational equipment and supporting documents, including but not limited to the following items, will be available on board the vessel and the captain will be familiar with them:
  - a. The Puget Sound Vessel Traffic Service Users Manual (USCG Local Notice to Mariners also available here):  
<https://www.pacificarea.uscg.mil/VTSPugetSound/>
  - b. Information on local VHF radio communications: See VTS Users Manual above, or this 2 pager:  
[https://www.pacificarea.uscg.mil/Portals/8/District\\_13/sectpugetsound/VTSpugetsound/LessThan20\\_2018.pdf?ver=2018-09-07-215430-077](https://www.pacificarea.uscg.mil/Portals/8/District_13/sectpugetsound/VTSpugetsound/LessThan20_2018.pdf?ver=2018-09-07-215430-077)
  - c. Those portions of the United States Coast Pilot – 10: Pacific Coast for any area in which the vessel will be navigated. Available in book form or online: <https://nauticalcharts.noaa.gov/publications/coast-pilot/xml2html.html?book=10>
  - d. Local tide and current information, available online:  
<https://tidesandcurrents.noaa.gov/products.html>
  - e. Puget Sound Harbor Safety Plan (click "Documents"):  
<https://marexps.com/membership/puget-sound-harbor-safety-committee/>
  - f. Foreign Yacht Familiarization Packet:  
<https://pilotage.wa.gov/pilotage-exemptions.html>
  - g. Paper or electronic charts of all areas to be navigated, updated and of appropriate scale.
3. As provided in RCW 88.16.070, if an exemption is granted it shall not be detrimental to the public interest in regard to safe operation preventing loss of human life, preventing loss of property, and protecting the marine environment. The Board may at any time review the exemption and revoke it, should it find the vessel is not in compliance with the requirements for exemption (including operation of the vessel in a manner that is not considered safe).
4. New regulations regarding approach distance to Southern Resident Orca whales go into effect 1/1/2025. It is unlawful for a vessel to approach within 1000 yards of a Southern Resident Orca. It is unlawful to position a vessel to be within 1000 yards of a Southern Resident Orca. Vessels are to reduce and restrict their speed to seven (7) knots when within 1000 yards of a Southern Resident Orca. Vessels that are within 400 yards of a Southern Resident Orca are required to disengage the vessel's transmission. In areas where Southern Resident Orca whales may be present vessel operators are asked to voluntarily set depth finders to 200 kHz frequency or temporarily turn them off. Vessel operators are asked to watch for the Whale Warning Flag to know when whales might be nearby. Vessels must remain 100 yards away from all other whales and marine mammals, and 200 yards away if they are resting or with their calf.
5. Vessel captain certifies they have read the Foreign Yacht Familiarization Packet.

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Signature of Vessel Owner or Representative

Date



**Vessel Captain Experience in Geographically Restricted Areas:  
Deception Pass / Ballard Locks / Duwamish River**

*Orientation with a Washington State Licensed Pilot may be required for these areas.*

*Read more about requirements here: <https://pilotage.wa.gov/pilotage-exemptions.html>*

**Vessel Captain has had Pilot Orientation**

**Date:** \_\_\_\_\_ **Vessel:** \_\_\_\_\_ **LOA:** \_\_\_\_\_  
                    YYYY-MM-DD

**Deception Pass**

**Ballard Locks (Hiram M. Chittenden Locks)**

**Duwamish River**