



**STATE OF WASHINGTON
BOARD OF PILOTAGE COMMISSIONERS**
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Meeting Minutes – Oil Transportation Safety Committee (OTSC)

March 2, 2026 1:00pm – 3:00pm

Via MS Teams

ATTENDEES:

Jaimie Bever (Chair/BPC), Andrew Drennen (Commissioner/BPC), Blair Bouma, (Pilot/PSP), Jeff Slesinger (Tug Industry/Delphi Maritime), Antonio Machado (Oil Industry/WSPA), Lillie Wightman (Tug Industry Alternate/AWO), Jim Peschel (Tug Industry Alternate/Vane Brothers), Fred Felleman (Environment/Friends of the Earth), Rein Attemann (Environment Alternate/WCA), Sara Thompson (Ecology), Brittany Flittner (Ecology), Lovel Pratt (Environment Alternate/Friends of the San Juans), Chloe Donaldson (Tribal/Port Gamble S'Klallam Tribe)

WELCOME & INTRODUCTIONS

Jaimie greeted the attendees. She introduced BPC U.S. Flag Shipping Representative Commissioner Andrew Drennen and Environmental Program Manager with the Port Gamble S'Klallam Tribe Chloe Donaldson. She announced that the Coast Guard would not be joining due to lack of federal funding. Jaimie then reviewed the agenda with the group and introduced the Ecology team assisting with the mitigation measures, Sara Thompson and Brittany Flittner.

RULE ADOPTION

Jaimie reviewed the BPC-adopted tug escort rule and shared the BPC's implementation [webpage](#). The Board adopted the new rule on November 20th during our Regular Public Meeting and then it went into effect on December 21st of 2025. She reported that the Board had received very few questions, mostly at the beginning of implementation and mostly about specifics of the pre-escort conference.

The next part of the meeting involved review of identified potential mitigation measures that came up during the rulemaking and/or the EIS, along with rationale/comments from the OTSC at the time.

RECOMMENDATIONS FOR MITIGATION LANGUAGE IN THE WAC

Standalone WAC Language. There were no initial recommendations by the OTSC for this mitigation measure. It was determined that the PSHSC SOC were too specific to reference directly in the WAC, the SOC have not been updated to address the target escorts yet, it was better not to include unenforceable language in the WAC, and the benefit of putting mitigation measure outside the WAC was that they can be more easily updated on a different platform.

Jim asked if there was a state-provided template for the pre-escort conference topics. Jaimie responded that the Board did not provide a template to allow flexibility for industry. Blair offered that the pilots already have a master/pilot exchange checklist. He personally has added the components of the checklist on the back. He added there are a few different templates the pilots use and that tanker companies most likely have their own templates. Fred suggested that the pilots and tug operators compare notes and try to align as much as possible. Jeff offered that AWO members would be extremely reluctant to distribute

operational procedure requirements to their members. They could, however, be engaged in facilitating discussion among member companies. Sara suggested that the BPC could think of it as an implementation tool that could be put on the website, to use if needed.

RECOMMENDATIONS FOR MITIGATION LANGUAGE TO INCLUDE IN A FUTURE LETTER FROM THE BPC TO THE PUGET SOUND HARBOR SAFETY COMMITTEE

Ask HSC to review their Tanker Escorts Standards of Care (SOC) applicability to section to determine how to address escorts of 5,000-40,000 DWT vessels. Fred asked for the current SOC to escort through the study area. Blair responded that the current SOC in the Harbor Safety Plan was for 40,000 DWT and up. The 5,000 to 40,000 DTW vessels are not addressed currently. Fred and Blair had a brief discussion regarding the escorting speed of 10 knots and whether that was appropriate for the new category of vessels. Fred wondered Harbor Safety Committee should conduct a re-evaluation of that practice. Blair thought that it was an appropriate transiting speed. Fred suggested adding a section to the recommendation letter that the group is recommending adding this new class of vessels specifically for each section, not just expanding the deadweight tonnage. Jim cautioned that it would be ambitious to go over 10 knots with a laden barge pushed by a tug, so this suggestion wouldn't affect his operation. Blair agreed, adding that some ATBs can go over 10 knots.

Consider SOC for commuting escort tugs to reduce speed to 10 knots when near SRKWs and other marine mammals where safe and practical to do so. Blair informed the group that there was not currently a SOC for commuting tug speed. Fred suggested that the group recommend a committee be convened to look at the SOC for operating around cetaceans in general. He acknowledged that it was the OTSC's role to recommend actual practices.

Jim asked about anchoring lighting and noise guidelines. He believed there was already a SOC to minimize noise and light at night. He wondered if the measure was specific to cetacean presence. Sara responded that yes, those were already in the SOC and that the EIS was basically giving the practice a thumbs up. She also added that there was a SOC group getting together to talk about tug escorts and SRKWs and that they could be making recommendations on a similar timeline as the OTSC. Fred expressed concern that the Marine Mammal Group Sara had referenced may have too narrow a focus not utilizing the resources of the group. Rein wanted to stress that the regulation of 1,000 yards distance of SRKWs could be included in the recommendation.

Blair wanted to make sure the group understood that most of the time when escort tugs are commuting, they are going at an economy speed to save fuel. Per Rein, the speed threshold for vessels impacting SRKWs successful foraging was 2-4 knots. He recommended that when they are in the vicinity of SRKWs, the speed requirement be reduced to 3-5 knots. Fred went back to the idea of having the Marine Mammal Group deal with those types of recommendations but suggested the group cite the laws. Blair felt that the escort recommendation was just about escorting and effective escorting. There could be a separate SOC about how to behave around whales. Sara suggested that the Harbor Safety Committee would probably be the place where these types of determinations would be made, but the OTSC/BPC can recommend that they consider speed in addition to other things identified through this process. Blair added that it should also be known and measurable. He also wondered about even trying to regulate the behavior of "commuting tugs" and suggested that some definitions might be necessary.

Fred stated that he wasn't suggesting the BPC tell the HSC how to organize the plan, just to look at the various mitigation measures together, making sure they don't conflict and have synergy where possible.

He reminded the group that the goal is to reduce impacts to marine mammals, particularly the critically endangered Southern Resident Killer Whales. He suggested informing mariners about good etiquette around whales and their acoustic sensitivity. He felt that since this effort was part of the tug escort rulemaking, what the tugs were doing between escorting was worthy of consideration.

Jeff wondered, based on what Sara had said, if the group was too far in the weeds, confusing its work with the work of the HSC. His other comment was that the work was not going to be easy for the HSC, as there will be much to sort through. He reiterated that the group's job was to recommend what they should be looking at when they are conducting their review.

Jaimie restated Fred's proposal for a higher-level marine mammal mitigation recommendation that would include commuting tugs and possibly other topics from today's meeting possibly including speed, distance, etc. The group will come back to this topic later in the agenda.

Sara suggested that another consideration could be to ask the HSC to look at the mitigation table in the EIS and decide for themselves what of those items would be considered in the SOC.

Support for the Tribal Fisheries Lost Gear Subcommittee and encourage participation from relevant industry. The PSHSC Lost Gear Subcommittee will be making a recommendation to the HSC at their next meeting in May. Sara mentioned that there was a proposal to keep the PSHSC Lost Gear Subcommittee active or at least do some sort of recurring review. The OTSC agreed to support the ongoing efforts of that subcommittee.

Express support for continuing conversations about tribal fishing interactions. This could include a discussion or standard of care on how best to find sport, commercial and tribal fisheries information. Fred suggested similar messaging as above, that the OTSC supports the ongoing work. Jim cautioned that he may not support 100% the findings of that work group, but he did encourage continued participation.

Once the rule is adopted, recommend that the BPC draft an open letter to escort operators with best practices for escort tugs and operators while actively escorting and/or commuting to and from escort of target vessels. The recommendations included measures such as limit waiting time at rendezvous points to reduce interactions with tribal fishing, comply with marina/port-specific best practices regarding discharge that could affect water quality, consider having a crew member on the escort tugs to watch for marine mammals, consider agreements (or other way of improving communication) to notify interested tribes of tug routes to avoid impacts, participate in the ECHO Program and Quiet Sound trials when commuting to and from escort jobs. Jaimie cautioned, regarding the list of recommendations, that the Board was the regulatory authority, and while there are subject matter experts on the Board, they do not typically regulate best practices for how pilots or tugs conduct their operations. Andrew agreed that this should be something for the HSC to take up. The BPC can support those efforts and make recommendations. But, as a Board member, he didn't believe the BPC should get into specifics. Blair expressed agreement that SOC additions shouldn't be too granular and should leave room for some operator discretion. He agreed with encouraging the HSC to consider the EIS and then let them make their decisions.

Regarding the recommendation for crew lookout, Jim stated that the International Collision Regulations already mandate appropriate lookouts and wondered if this recommendation was asking for above and beyond that. Brittany responded that in looking through the EIS, she noted that a few of the proposed

mitigation measures were just to ensure compliance with existing requirements. Fred wondered about training lookouts to identify marine mammals.

Andrew recognized that some of the recommendations would be challenging to get across the finish line as a SOC. He wondered if the Dept. of Ecology could expand their voluntary best achievable practice program to include tug escorts. Sara responded that the current program just includes tankers, barges, and ATBs. It would be a big change to add another vessel type.

Jeff suggested that the committee stay focused on tug escorts for certain types of vessels. The environmental considerations were a separate issue. He reminded everyone that tugboat operators have a lot to do to prepare for each escort job including transiting, maintaining machinery, sleeping, eating, etc. He wanted to get back to the goal: helping to preserve the SRKWs by preventing an oil spill or spill incident for a certain class of vessels using escort tugs. Sara wondered how Jeff felt about referring the HSC to the entire recommendation table in the EIS or if he'd prefer to highlight certain ones. He replied that highlighting would be ideal. Sara suggested that there were basically two options on the table: refer to the whole list or refer to certain items.

At this point in the meeting, the group decided to work toward some language options to vote on for a recommendation to the BPC. They identified the following points:

1. Review and update tanker escort SOC to include the 5,000 – 40,000 DWT target vessels.
2. Consider a new SOC regarding escort tug (and consider expanding to all vessels) operations in the vicinity of cetaceans:
 - a. Review applicable EIS recommendations for environmental and cetacean considerations:
 - i. Refer to EIS – with guiding principal when tugs are being used as escorts
 - ii. Refer to EIS – with guiding principal when tugs are underway but not in escort
3. Review and consider EIS Table 2 mitigation measures

There was additional conversation on how to structure the recommendations. However, the meeting was just about over, and Jaimie decided the group would need to meet one more time to finalize the recommendation.

2028 Rule Effects Assessment. Jaimie ran through this slide outlining the requirements of the assessment, the proposed timeline for the work, and the plan for consultation, outreach, and next steps.

The meeting then adjourned shortly after 3:00pm.

2028 Rule Effects Assessment
(As presented to the BPC at the February 19, 2026 Regular Public Meeting – <https://pilotage.wa.gov/meetings>)

RCW Requirements:

- Analysis of the effects of the rule on vessel traffic patterns and oil spill risks in the Salish Sea
- Analysis of whether experienced or forecasted changes to vessel traffic patterns or oil spill risk necessitate an update to the rule
- Modeling from Ecology's risk model
- Consultation with USCG and potentially affected federally recognized Tribes
- MAY include vessel traffic data, vessel accident and incident data

Timeline:

- Phase 1 Scoping – Through Summer 2026
- Phase 2 Technical Work & Write up – Summer 2026-Fall 2027
- Phase 3 Decision Support – Summer 2027-May 2028

Consultation, Outreach, Next Steps:

- Outreach – Tribal Governments, USCG
- Workshops – Stakeholder and Tribal Governments (and OTSC if reconvened)
- Industry-Specific and/or Targeted SME Outreach

28