



STATE OF WASHINGTON
BOARD OF PILOTAGE COMMISSIONERS

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OPEN LETTER TO INDUSTRY

REGARDING CHAPTER 363-116 WAC TUG ESCORT RULEMAKING RULE ADOPTION

IMPLEMENTATION DATE: DECEMBER 21, 2025

On November 20, 2025, The Board of Pilotage Commissioners (BPC) adopted a [new section of Chapter 363-116 WAC](#), Pilotage Rules, to establish tug escort requirements for oil tankers between 5,000 and 40,000 deadweight tons (DWT) and barges and articulated tug barges greater than 5,000 DWT. The adopted rule closes critical safety gaps for vessels carrying oil in bulk, reducing the risk of a catastrophic oil spill in Puget Sound and helping to protect wildlife, including endangered Southern Resident killer whales (SRKW), fisheries, public health, and Washington's economy.

The adopted rule:

- Is designed to meet Best Achievable Protection (BAP), as defined in [RCW 88.46.010](#).
- Is informed by other considerations in [ESHB 1578](#), such as minimizing impacts on Treaty fishing and underwater noise.
- Modifies the tug escort requirements established in [RCW 88.16.190\(2\)\(a\)\(ii\)](#), effective September 1, 2020.

The adopted rule does not apply to unladen vessels or tank vessels that are conducting bunkering, which includes the transit of the tank vessel to the bunker location, the oil transfer operation, and the return transit of the tank vessel.

NEW RULE AREA:

The new rule keeps the tug escort requirements in Rosario Strait and waters east, as codified by statute in 2020, and expands approximately 28.9 square miles to the northwest towards Patos Island (an 11% increase in area).

NEW RULE REQUIREMENTS:

1. Escort Tug Requirements:
 - Establishes minimum horsepower (hp) requirements for tugs escorting these vessels based on the escorted vessel's deadweight tonnage (DWT):
 - 2,000 hp for vessels between 5,000 and 18,000 DWT, and
 - 3,000 hp for vessels greater than 18,000 DWT



- Requires tugs escorting these vessels to have a minimum of twin screw propulsion (i.e., at least two propellers).
 - Requires a pre-escort conference between the escort tug and tank vessel to discuss the operational details of the transit.
2. Pre-Escort Conference Requirements: Before each escort, the tank vessel officer in charge shall hold a pre-escort conference with the escort tug officer in charge. If the tank vessel has a pilot onboard, the pilot shall also be included in this conference. The purpose of the pre-escort conference is to discuss and agree upon operational details of the transit. The pre-escort conference must be recorded in the logbooks of the participating vessels and shall include discussion of the following topics:
- Safety.
 - Safety of tug and tank vessel personnel; and
 - Safe working load of the deck fittings on the tank vessel.
 - Navigation.
 - Anticipated route and destination;
 - Anticipated speeds during the transit;
 - Active tribal, commercial, and recreational fisheries;
 - Relevant local notice to mariners;
 - Location and approximate time of the escort beginning and end;
 - Anticipated weather, tides, currents, sea-state, and traffic; and
 - Recent whale sightings.
 - Operations.
 - Operational status of each vessel and their equipment including any limitations such as speed;
 - Propulsion type and maximum direct bollard pull of the tug;
 - Primary and secondary means of communication (e.g. VHF radio);
 - Availability of appropriate crew members and their roles when responding to an emergency;
 - Tethering location (if applicable), relative position, and direction of travel of the tug(s) during the transit;
 - Method of connection of the tug to the tank vessel in an emergency or if tethering (e.g. tug's line, pennant, messenger line, etc.);
 - Whether any training or escort exercise will be performed during the transit; and
 - Any other items to ensure that in the event of a failure or emergency the tank vessel can be kept under control and within the limits of the available channel.

MONITORING AND ENFORCEMENT:

If the BPC becomes aware of any potential violations, we will contact the operators and, if needed, investigate any non-compliance. In addition, the BPC can take legal action pursuant to [88.16.150 RCW](#).

FREQUENTLY ASKED QUESTIONS AND OPPORTUNITIES FOR ENGAGEMENT:

The BPC will be posting and updating Frequently Asked Questions on the [BPC website](#). Please direct your questions to Jaimie Bever, Executive Director, at jaimie.bever@wsdot.wa.gov or 206-515-3887. The BPC's [monthly meetings](#) will include an agenda for this topic and public comment will be welcomed.