



THE NORTHWEST
SEAPORT ALLIANCE
Gateway to Solutions
nwseaportalliance.com

Jaimie Bever
Board of Pilotage Commissioners
2901 Third Avenue, Suite 500
Seattle, WA 98101

April 26, 2019

Dear Ms. Bever:

The Northwest Seaport Alliance (NWSA), which manages many of the maritime facilities in the ports of Seattle and Tacoma, very much appreciates the extensive work of the Washington State Board of Pilotage Commissioners (Board) particularly in compiling information relative the current work levels of the very skilled state-licensed pilots upon whom our ports rely.

We note that the current trend indicates a decline in the number of pilotage assignments per year (e.g., an average of 7,736 for the three years of 2011, 2012 and 2013 compared to an average of 7,412 for the years 2016, 2017 and 2018). This downward trend corresponds to the NWSA's own projection of fewer vessels of increasing size.

We offer the following questions in support of the Board's pending decision-making relative the authorized number of pilots:

- 1) In 2018, 51 licensed pilots worked a total of 7,324 assignments, an average of approximately 144 assignments per year (or approximately 146.5 assignment per pilot per year based on an effective pilot pool of 50 with one pilot serving full time as president of the Puget Sound Pilots). Also, in 2018, ten (10) pilots worked in excess of 170 assignments each (with one pilot working a total of 223 assignments). In accomplishing these aforementioned assignments, were the then applicable rest rules satisfied? If the then applicable rest rules were not satisfied, what actions have or will be taken to ensure compliance? If the then applicable rest rules were satisfied, how might this information influence decision-making relative the setting of the future target assignment level per pilot?
- 2) Is it the intension of the Board to place a limit on the number of accumulated "comp days" per pilot with a corresponding provision for compulsory acceptance of assignments for those pilots who are properly rested and have the fewest number of accumulated "comp days"?



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Thank you for considering our questions as the Board proceeds with its important work in ensuring safe and reliable pilotage in this our nation's most trade dependent state.

Sincerely,

Louis W. Paulsen
Director, Strategic Operations Projects and Risk Management

cc: Sheri Tonn, Chair, Board of Pilotage Commissioners
Linda Stryk, Puget Sound Pilots
Eric Von Brandenfels, Puget Sound Pilots
Michael Moore, Pacific Merchant Shipping Association