



STATE OF WASHINGTON
BOARD OF PILOTAGE COMMISSIONERS

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MEMORANDUM

TO: Board of Pilotage Commissioners

FROM: Sheri, Tonn, Chair, Board of Pilotage Commissioners

DATE: January 17, 2019

SUBJECT: Procedure for Setting the Number of Marine Pilots in the Puget Sound and Grays Harbor Pilotage Districts

The Board of Pilotage (BPC) has the responsibility for setting the number of pilots, and in 2005 established a rule, WAC 363-116-065, that outlines the process and criteria for establishing this number:

The Board will, from time to time, set the number of pilots to be licensed in each pilotage district of the state that is best calculated to optimize the operation of a safe, fully regulated, efficient, and competent pilotage service. This determination will be made by the board at meetings for which the agenda lists this issue as a topic for resolution. In addition, the board shall plan ahead to ensure, to the extent possible, that pilot trainees enter the training program set forth in WAC [363-116-078](#) so that they complete the training program in a timely manner.

(2) In setting the number of pilots and making decisions as to when to hold an examination and admit applicants to the training program, the Board may consider factors which include, but are not limited to, the following:

- (a) Policy of the state to ensure safety of persons, vessels, property and the environment by providing competent, efficient and regulated pilotage for vessels;
- (b) The importance of the maritime industry to the state balanced by the potential hazards presented by the navigation of vessels requiring pilots;
- (c) The lead time necessary to select and train new pilots;
- (d) Regional maritime economic outlook, including without limitation: Current economic trends in the industry, fluctuations in the number of calls, the types of assignments, the size of vessels, the cyclical nature of the traffic and whether traffic is increasing or decreasing and the need to minimize shipping delays;
- (e) Workload, assignment preparation and rest needs of pilots;
- (f) Trends in size of piloted vessels;
- (g) Time lost to injury and illness;
- (h) Anticipated retirements;
- (i) Administrative responsibilities, continuing education and training requirements consistent with the policy of chapter [88.16](#) RCW; and
- (j) Surface transportation and travel time consumed in pilots getting to and from assignments.

In 2011, the Board defined the "Target Assignment Level" at 145 assignments per year, with an assignment defined as:

- a. A billable event relating to pilotage services.
 - i. Assignments include cancellations and ship movements, regardless of duration.
 - ii. For purposes of work allocation, an assignment is considered to commence when a pilot is assigned a vessel and concludes upon the pilot's arrival at the pilot station on an outbound assignment or upon the completion of travel for an inbound assignment (or upon Cancellation).

The current number of authorized pilots in the Puget Sound Pilotage District is 52, including the president of PSP. The Grays Harbor District has 2 authorized pilots. In 2018, the BPC issued guidance on the length of rest periods between assignments, and Puget Sound Pilots have revised their rest rules. In addition, they have changed their watch system from a two watch system to one that provides greater flexibility and better attention to rest rules.

Puget Sound Pilots have made a formal request that the Board review the current number of authorized pilot licenses, and consider authorizing additional pilot positions. In addition, the Port of Grays Harbor has requested that an individual begin training, with the plan to bring the number of pilots from two to three. The BPC has a significant amount of data on pilot assignments and has requested additional data from PSP. To make a decision on the Target Assignment Level, and the authorized number of pilots, additional data is needed. In addition, the criteria for setting the numbers needs to have well defined criteria. I propose the following schedule for BPC action. At our meetings over the next three months:

February 21 meeting	Discuss additional data needs and examine available data
March 21 meeting	Review all data and criteria for decision-making
April 18 meeting	Hearing: Set new TAL and authorized number of pilots for each district

We will want to determine the theoretical number pilots needed, then analyze factors that could affect that number. We will also want to look at ways of improving system inefficiencies and uncertainties.

The following are questions for each pilotage district:

1. Describe the current watch system, and explain how it has changed since the current authorized number of pilots was established
2. Describe how our watch system compares to other pilotage districts
3. What are the factors that control the number of comp days accumulated by pilots? (The Board gets regular reports on comp days.)
4. Please provide a summary of retirements anticipated over the next five years. We have observed that the number of active pilots is decreased by pilots using comp days immediately before retirement. Is there a way to allow licensing a new pilot before a licensed pilot turns in a license?
5. Please describe the frequency of ship delays caused by the lack of an available pilot.

Other questions?