



STATE OF WASHINGTON
BOARD OF PILOTAGE COMMISSIONERS

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WAC 363-116-065 Number of Pilots (NOP)

Instructions for Stakeholders

Introductory Statement

Per WAC [363-116-065](#) “(1) 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”.

Definitions

1. “Number of Pilots” (NOP) – For the process of determining the appropriate number of pilots in the Puget Sound Pilotage District, the BPC will hold a series of public meetings as outlined in this memo. Holding a “hearing” to determine the number of pilots is not a requirement of either the RCW or the WAC. The process will be referred to as Number of Pilots or NOP.
2. “Target Assignment Level” (TAL) – The TAL will be discussed and recommended by the Pilot Safety Committee (PSC) for Board adoption PRIOR to setting the number of Pilots.
3. “Number of Pilots” (NOP) – This refers to the number of authorized pilot licenses in a pilotage district, taking into account the considerations outlined in WAC [363-116-065](#) as follows:

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.

- I. Timeline

4/12/2024	BPC refers Target Assignment Level setting to the Pilot Safety Committee (PSC)
5/2024 – 6/2024	PSC TAL meetings
5/16/2024 – BPC Meeting	BPC approves Number of Pilots (NOP) process
06/03/2024	BPC posts NOP data packet to website
6/20/2024 – BPC Meeting	PSC Recommends TAL to BPC Deadline for Parties of Interest (POI) to identify themselves
7/10/2024	POI proposals due to BPC by 4pm via email
7/18/2024 – BPC Meeting	POI proposal presentations and public comment
8/7/2024	POI rebuttals due to BPC by 4pm via email
8/15/2024 – BPC Meeting	BPC deliberates and determines Number of Pilots
8/23/2024	BPC Final Decision document posted to website and distributed to POIs

II. Parties of Interest (POI)

A stakeholder interested in submitting a proposal must identify themselves as a Party of Interest by contacting Jaimie Bever in writing at BeverJ@wsdot.wa.gov no later than 4:00pm, June 20, 2024.

III. POI Proposal Submittals

a. Format

- i. Electronic files only via email to Jaimie Bever at BeverJ@wsdot.wa.gov by 4:00pm PDT, July 10, 2024.

b. Parameters

- i. Submittals must address the factors listed in WAC 363-116-065, including the high percentage of callback assignments as it relates to rest needs of pilots.
- ii. Submittals must utilize monthly PSP pilotage data and activity reports to support arguments.
- iii. BPC will provide PSP pilotage assignment data and activity reports 2019 -2023, as well as BPC summaries of that data and BPC training and licensing data related to number of pilots.
- iv. Pilotage assignment data prior to 2019 should not be referenced due to rest rule changes in 2018.

c. Late Submittals

- i. Late submittals will NOT be accepted or considered by the BPC.

d. Data Resources

- i. BPC staff develops dashboards and other graphics. Additional data visualizations will not be developed for POI unless directed by the Board.

e. Rebuttals

- i. Electronic files only via email to Jaimie Bever at BeverJ@wsdot.wa.gov by 4:00pm PDT, August 7, 2024.
- ii. Rebuttals must NOT introduce new topics, or topics not included in the original submission.

f. Public Comment

- i. There will be an opportunity for public comment on this agenda item at each meeting until the process is complete.

IV. Record Keeping

- a. Website – A record of the submissions and official documents will be available on the BPC website at <https://pilotage.wa.gov/rcw-wac.html>.

V. Documentation Regarding BPC Decision

- a. BPC Program Analyst Bettina Maki will prepare final documentation for BPC decision.
- b. BPC will provide a final decision document, which will contain rationale for the decision reached. This document will be posted to the online record no later than 4:00pm August 23, 2024.