

2022 - BPC Reopening Plan (v3_2022/03/09)

What has Changed

With the decrease of new COVID-19 cases, guidelines for the reopening of state agencies continue to evolve. Revisions (in orange below) to this latest version include:

- An April 1, 2022 BPC office reopening
- Vaccine mandates and compliance
- Office preparations for multiple in-person occupancy
- A screening process for BPC staff, commissioners, contractors, and volunteers
- Updates to masking protocols
- Updates regarding BPC meetings

Prioritizing Services

The COVID-19 pandemic has changed the way we work. We have learned a great deal about our capacity to perform many of our functions through telework and technology and remained clear about many essential services that must be done in our facilities and at our worksites. We also know that during the peak of the pandemic we were able to delay or create workarounds for some services to help us minimize the spread of COVID-19 while continuing BPC operations. Now it is time to use what we have learned to close gaps that still exist in our business processes and improve services and access.

To safely reopen, our *Healthy Washington - Roadmap to Recovery* plan will include support of a workforce that may continue to accomplish business outcomes through telework, while identifying the work that must be done on premise or in-person in the community. A combination of on-site and telework may be the best option for BPC employees (a hybrid model).

Timeline

The BPC reopening plan will be initiated **April 1, 2022** and in conjunction with the Governor's direction for state agency reopening.

Vaccinations

The Governor issued a proclamation declaring that state workers are mandated to be fully vaccinated by October 18, 2021. Full vaccination is considered, by the CDC, to be two weeks post the final phase of vaccinations (2 shots for Pfizer and Moderna, and 1 shot for Johnson & Johnson). As of the date of this plan, BPC Staff is fully vaccinated and boosted.

Office Preparations

In addition to regular janitorial maintenance from 2901 management, BPC staff will regularly wipe down and sanitize surfaces and handles. An adequate supply of hand sanitizer is available. In addition, the BPC is utilizing a 450 CADR (cfm) portable HEPA filtration unit to maintain healthy air quality in the office!

Screening

Screening is required for all BPC staff, commissioners, contractors, and/or volunteers who report to an out-of-home work location where they may be around other people, or in shared space that other people access (bathrooms, dining/kitchen areas, vehicles, etc.).

Screening must be conducted upon entry to the 2901 building. Documentation is available in the BPC office and a thermometer in the IT Department on the First Floor or in WSF Reception on the Fifth Floor. BPC staff can assist with

entry to the secured IT department. Staff, commissioners, contractors, or volunteers who are teleworking and not accessing an out-of-home worksite are not required to screen. Processes are in place through *Healthy Washington – Roadmap to Recovery* guidelines for individuals with exposures, symptoms, positive cases of COVID-19. BPC staff can provide more information upon request.

Masking

When BPC staff is working alone, there is no requirement for a mask as long as they are not in public spaces. When staff is sharing office space, they are considered working alone when in their designated workspace areas. Mask are required for entry to another’s workspace area, public areas inside the office, and in the rest of the 2901 building. If there is a meeting onsite, BPC staff, commissioners, contractors, and volunteers are required to wear a mask.

Proposed Staff Schedule

Washington State agencies are encouraged to accommodate teleworking as much as possible going forward. BPC staff have expressed a desire to work a hybrid schedule. A trial period of (3) months of the schedule below will commence beginning **Friday, April 1, 2022**, with a review in **July 2022**. Note: BPC staff will be present in person for committee or Board meetings. Also, days may occasionally change due to business needs. Staff will continue to be flexible and responsive to the timely needs of BPC business.

	Monday	Tuesday	Wednesday	Thursday	Friday
Jaimie	In Office	In Office	In Office	In Office	Telework
Bettina	Telework	In Office	Telework	In Office	In Office
Jolene	Telework	In Office	Telework	Telework	Flex Schedule

Public Board Meetings:

Once Governor Inslee lifts the restriction on public meetings, the BPC will resume in-person public meetings, with a virtual option. *The Agate Conference Room is scheduled to receive a new large screen computer, which would better accommodate BPC meetings. In addition, BPC will explore purchasing a Meeting Owl to assist with meeting audio.*

BPC Committee Meetings:

BPC committees will be allowed to meet in person with a virtual option as well, *once it is safe to do so, and under the direction of the state.*

Drop-in Workspaces

The 4th and 5th floors of the 2901 building are being transitioned into flex-work/drop-in spaces as the majority of the WSF personnel stationed there will be permanently teleworking or adopting a hybrid schedule. Drop-in stations will be equipped with monitors, docking stations, and keyboards/mouse. Commissioners are welcome to use those spaces while in the 2901 building. Focus areas are established with large monitors for smaller in-person/virtual meetings.

Office Monitoring

A sensor has been placed at the front door of the office to monitor people coming and going during public hours to help notify staff working alone of when someone has entered or exited the office, especially if they are not in view of the door. *At this time, state agencies are not open to the public and BPC staff may choose to work with the door closed.*

**State of Washington
Pilotage Commission
March 17, 2022**

Grays Harbor District Report

There were 3 arrivals in February for a total of 8 jobs. Year to date February there have been 6 arrivals for a total of 19 jobs. There are 6 vessels scheduled for March, 4 dry bulk. 1 liquid bulk and 1 logger.

AGP

Dry bulk customer AGP is doing some painting and other prep work to get ready to reinstall the permanent ship loader. The plan now is to shut down at the end of April and begin the reinstallation. With operations commencing in mid-May.

Pilot Trainee

As of last week, Pilot Trainee Captain Ryan Leo had completed all 7 of the required trips in the first section (initial familiarization/observation) of his training program. Captain Leo now moves to the second section (initial route) of his training program where he just completed the first of 18 trips required in that section. As of March 4, 2022 he has made 100% of the available trips.

PUGET SOUND PILOTAGE DISTRICT ACTIVITY REPORT

Feb-2022

The Board of Pilotage Commissioners (BPC) requests the following information be provided to the BPC staff **no later than two working days prior to a BPC meeting** to give Commissioners ample time to review and prepare possible questions regarding the information provided.

ACTIVITY					
Total pilotage assignments:	555	Cancellations:	15		
Total ship moves:	540	Cont'r:	149	Tanker:	183
		Genl/Bulk:	129	Other:	79
Assignments delayed due to unavailable rested pilot:	52	Total delay time:	397.5		
Billable delays by customers:	57	Total delay time:	167		
Order time changes by customers:	212				
2 pilot jobs:	35	Reason:	PSP GUIDELINES FOR RESTRICTED WATERWAYS		
Day of week & date of highest number of assignments	Tuesday 2/15				28
Day of week & date of lowest number of assignments:	Saturday 2/12, Wednesday 2/23				12
Total number of pilot repositions:	77	Upgrade trips	10	YTD	18
3 consecutive night assignments:	34	YTD	67		
Callback Days/Comp Days					
	Starting Total	Call Backs (+)	Used (-)	Burned (-)	Ending Total
Licensed	2546	88	48		2586
Unlicensed	217				217
Total	2763				2803

Pilots Out of Regular Dispatch Rotation (pilot not available for dispatch during "regular" rotation)

A. Training & Continuing Education Programs

Start Dt	End Dt	City	Facility	Program Description	Pilot Attendees
1-Feb	6-Feb	Covington, LA	MPI	Manned Model Shiphandling	BOZ, MIL
12-Feb	20-Feb	Covington, LA	MPI	Manned Model Shiphandling	MCN, VEL

B. Board, Committee & Key Government Meetings (BPC, PSP, USCG, USACE, Port & similar)

Start Dt	End Dt	City	Group	Meeting Description	Pilot Attendees
1-Feb	1-Feb	Seattle	PSP	Schedule	HAM, KNU, ROU
1-Feb	1-Feb	Grays Harbor	BPC	TEC	ANT, BEN
2-Feb	5-Feb	San Francisco	PSP	West Coast Pilot Conference	KLA
2-Feb	2-Feb	Seattle	PSP	Harbor Safety	KAL
2-Feb	2-Feb	Seattle	PSP	Schedule	GRK, HAM, KNU, NIN, ROU
3-Feb	5-Feb	Seattle	PSP	President	THG
3-Feb	3-Feb	Seattle	PSP	Schedule	HAM, KNU, ROU
4-Feb	4-Feb	Seattle	PSP	Schedule	HAM, KNU
7-Feb	11-Feb	Seattle	PSP	Schedule	HAM, KNU, NIN, ROU
7-Feb	7-Feb	Port Angeles	PSP	Pilot Boats	SEM

8-Feb	8-Feb	Seattle	USCG	USCG	KNU, NEW, VON
9-Feb	9-Feb	Seattle	BPC	Vessel Exemption Committee	ANT, MCG
9-Feb	9-Feb	Seattle	BPC	Pilot Safety	ANA
9-Feb	9-Feb	Seattle	PSP	NWSA, Waterway	BOU, LOB
10-Feb	10-Feb	Seattle	PSP	Outreach	BOZ
11-Feb	11-Feb	Seattle	PSP	Outreach	BOZ
14-Feb	14-Feb	Seattle	PSP	General Membership	GRK, HAM, NIN, ROU
15-Feb	15-Feb	Seattle	PSP	BOD	ANA, COR, GRD, GRK, MYE
16-Feb	16-Feb	Seattle	BPC	TEC	ANT, BEN, SCR
16-Feb	16-Feb	Seattle	PSP	General Membership	GRK, HAM, KNU
16-Feb	16-Feb	Seattle	BPC	BPC Prep	ANT, BEN
17-Feb	17-Feb	Seattle	BPC	BPC	ANT, BEN
18-Feb	18-Feb	Seattle	PSP	BOD	ANA, COR, GRD, GRK, MYE
20-Feb	23-Feb	Seattle	PSP	President	THG
23-Feb	23-Feb	Port Townsend	PSP	Outreach	BOZ, THG, VEL
28-Feb	28-Feb	Seattle	PSP	Rate Committee	COL, GAL, GRK, KLA, MOT
28-Feb	28-Feb	Seattle	BPC	Joint Diversity Committee	BEN, VON

C. Other (i.e. injury, not-fit-for-duty status, earned time off, COVID risk

Start Dt	End Dt	REASON	PILOT
1-Feb	28-Feb	NFFD	THG
1-Feb	11-Feb	NFFD	KNU
1-Feb	8-Feb	ETO	ANA, CAW, KAL, KEA, MCN
1-Feb	4-Feb	NFFD	HUP
5-Feb	28-Feb	NFFD	SID
15-Feb	22-Feb	ETO	GAR, JEN, ROU, SEY, EME
21-Feb	22-Feb	ETO	CAI

Presentations

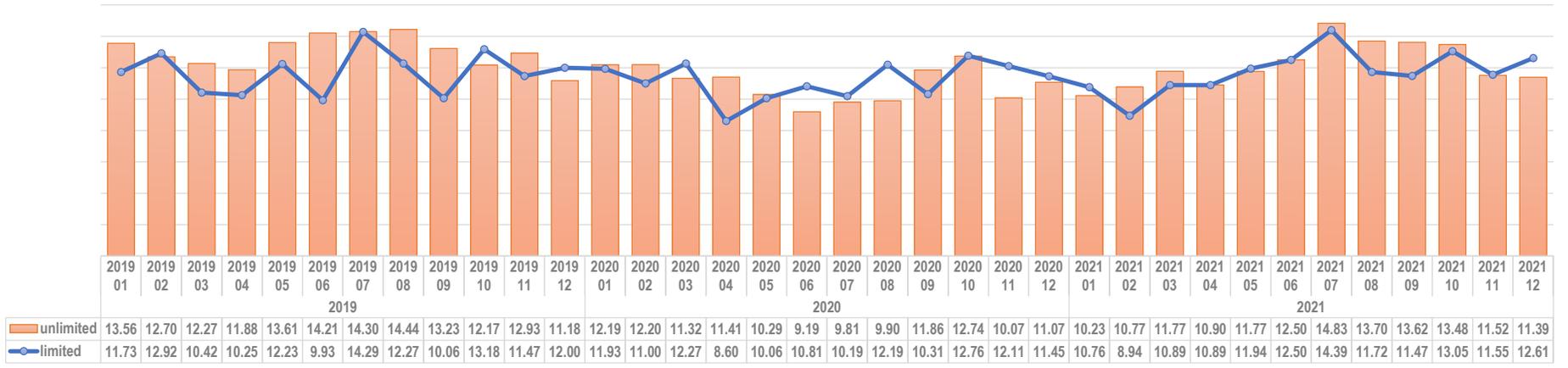
If requesting to make a presentation, provide a brief explanation of the subject, the requested amount of

- 🕒 *Presentations may be deferred if prior arrangements have not been made.*
- 🕒 *The Board may also defer taking action on issues being presented with less than 1 week notice prior to a scheduled Board Meeting to allow adequate time for the Commissioners and the public to review and prepare for discussion.*

PUGET SOUND DISTRICT LICENSED PILOTS ACTIVITY 2019-2021, SHOWING NUMBER OF AVAILABLE PILOTS EACH MONTH

	2019 01 (JAN)	2019 02 (FEB)	2019 03 (MAR)	2019 04 (APR)	2019 05 (MAY)	2019 06 (JUN)	2019 07 (JUL)	2019 08 (AUG)	2019 09 (SEP)	2019 10 (OCT)	2019 11 (NOV)	2019 12 (DEC)	2020 01 (JAN)	2020 02 (FEB)	2020 03 (MAR)	2020 04 (APR)	2020 05 (MAY)	2020 06 (JUN)	2020 07 (JUL)	2020 08 (AUG)	2020 09 (SEP)	2020 10 (OCT)	2020 11 (NOV)	2020 12 (DEC)	2021 01 (JAN)	2021 02 (FEB)	2021 03 (MAR)	2021 04 (APR)	2021 05 (MAY)	2021 06 (JUN)	2021 07 (JUL)	2021 08 (AUG)	2021 09 (SEP)	2021 10 (OCT)	2021 11 (NOV)	2021 12 (DEC)	2022 01 (JAN)	2022 02 (FEB)	
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PSP Average Assigns Per Pilot Per Month
 Limited vs Unlimited Licenses
 2019, 2020, 2021
 (does not include president)



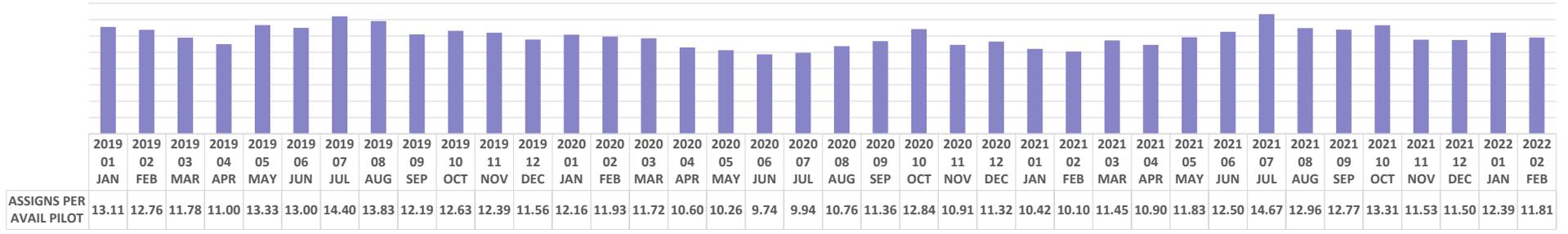
PSP Assignments per pilot per month,
 limited license and unlimited license,
 averaged over entire year,
 2019, 2020, 2021
 (does not include president)



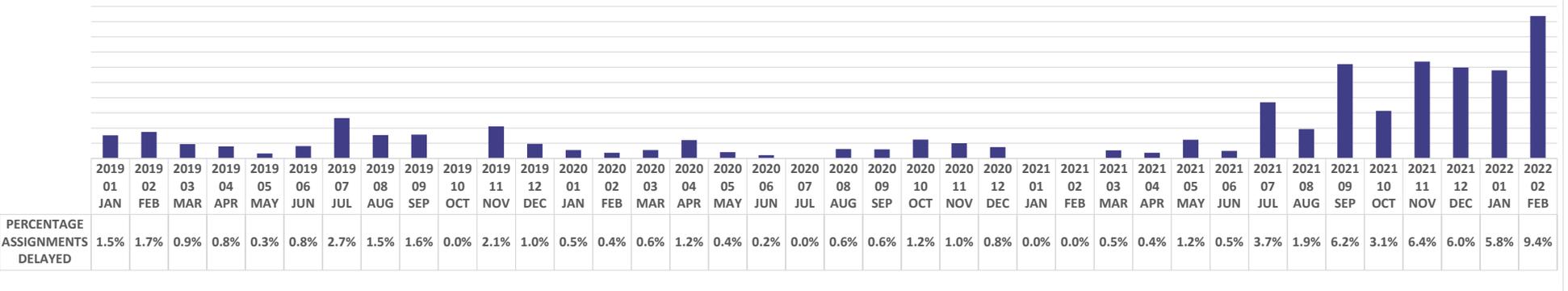
*Looking at all assignments for each year, pilots with **majority** of their assignments less than 5 years since license date were grouped with "limited" license group for the whole year.*

*2021: #197 and higher
 2020: #194 and higher
 2019: #191 and higher*

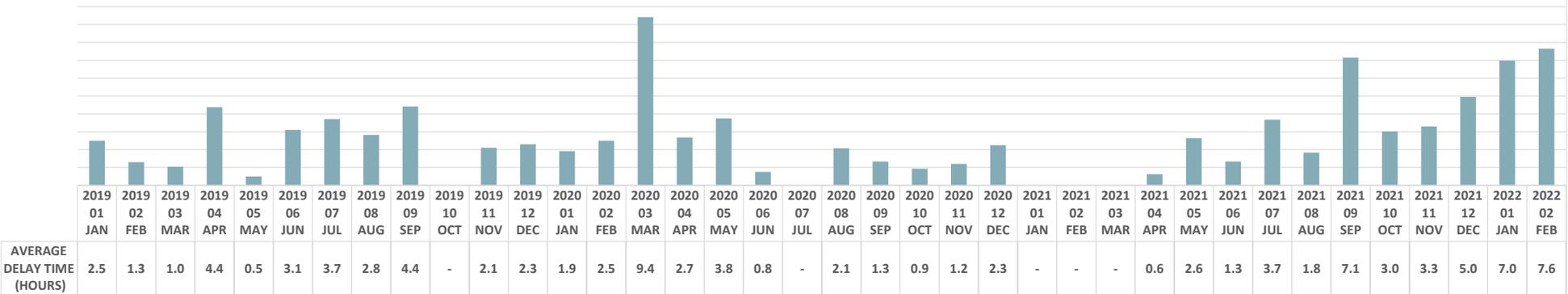
ASSIGNMENTS PER AVAILABLE PILOT
Puget Sound District Jan 2019 - Feb 2022



Puget Sound District Activity Report Data Jan 2019 - Feb 2022
PERCENTAGE OF ASSIGNMENTS DELAYED
(count of delays due to unavailable rested pilot divided by count of assignments)



Puget Sound District Activity Report Data Jan 2019 - Feb 2022
AVERAGE DELAY TIME (HOURS)
(hours of delays divided by number of delays)



WA State Board of Pilotage Commissioners

Industry Update: March 17, 2022 BPC Meeting

Vessel Arrivals – Non Tank Down, Tank Vessels Up

Year to Date

Containers down 15	Car Carriers down 3
Bulkers down 1	Cruise ships – season not started
General - same	Tankers up 22
RoRo up 4	ATB's up 6

Container arrivals trending down over 4 years. In 2019, there were 76 container vessel arrivals in January and that dropped to 72, 61 and now 59 in 2022.

Russia Invasion of Ukraine

Various actions are being taken by individual companies and the international community. On a port/cargo basis, the International Longshore and Warehouse Union (ILWU) in 29 ports up and down the United States West Coast, stated on March 3rd that they will refuse to load or unload any Russian vessels or Russian cargo coming into or going out of all West Coast ports from Bellingham to San Diego. Although Russian flagged ships are not that common to port calls on the west coast, the Russian cargo piece is less defined so stay tuned.

Container Vessels Queuing Up: at Anchor, Drifting or Slow Steaming

- ✓ Queueing changes implemented in September of 2021 continue to be successful at reducing the number of container vessels at anchor or loitering off the coast. Currently zero at anchor so 2 assignments per port call (arrival/departure) instead of 3 (arrival, shift, departure).
- ✓ LA/LB (at the time of this writing) has 52 container ships backed up include 4 container ships at anchor, 1 loitering within 25 miles plus 47 slow speed steaming or loitering outside the Safety and Air Quality Area (SAQA) well offshore.
- ✓ Oakland peaked at 28 in queue then reduced to zero as some weekly services were temporarily suspended. Political pressure to resume some services to facilitate exports has led another backup – 19 vessels at anchor or at sea loitering or slow steaming (at time of this writing)

Pilot Service Supply, Demand & Delays

- ✓ Concerns when comparing volume of arrivals (175 in February) to pilot delays - ??
- ✓ Pacific Maritime Management Services continues to track vessels from departure from Asia (or elsewhere) destined for the U.S. West Coast (container vessels queuing). This fits into leveraging forecast port call information to assist terminal operators, rail, trucking/gate decisions and other service providers. BC posts their scheduling for departure, lead time prior to departure (order time) and arrival time off Victoria which provides lead time if coming to PA for pilot service to a Puget Sound port/terminal. This should be useful information to PSP in managing pilot availability/demand.

TPM Conference

03 Mar 2022 by Paul Avery

... A.P. Moller-Maersk (Maersk) CEO of Ocean & Logistics, Vincent Clerc, spoke before a capacity crowd on the opening day of the *Journal of Commerce's* Transpacific Maritime (TPM) annual event. Clerc outlined Maersk's progress towards its strategy to become an integrator of global logistics, and how its acquisitions in the US are building the company's "value proposition" in the US.

But on the question of the step increase in freight rates, Clerc said very little. "A lot is still unfolding. No-one has all the answers. Getting together and talking is key. We made important decisions in 2020 on our pricing for customers. We would forego spot rates in favour of long term, fair-priced contract rates and added 200,000 TEU to the Asia/U.S. Transpacific trade, doubling our capacity from 2019 levels.

We are here for the long-term customer relationship." This operating paradigm has hit the wall and cannot keep up with the demand. ONES CEO Jeremy Nixon said at TPM that one of its vessels was at berth for 11 days. The US supply chain needs West Coast ports to be more productive, and that will come at a cost that must ultimately be supported by higher freight rates.

Ocean shipping to and from Russia halted by container lines

Workboat Magazine: Pamela Glass March 3, 2022

As the invasion of Ukraine enters its second week, the international shipping community is suspending cargo routes to and from Russia, disrupting trade in everything from electronics and metals to clothing. On Tuesday the world's three largest container lines, A.P. Moller-Maersk A/S, MSC Mediterranean Shipping Co. and CMA CGM S.A., joined Hapag-Lloyd AG and Asia's Ocean Network Express Pte. Ltd. in halting services in the wake of Russia's invasion of Ukraine. These companies represent 47% of the global shipping trade.

CMA CGM Cautions On Sanctions And War Fallout

by Gus Trompiz (Reuters) March 4, 2022

<https://gcaptain.com/cma-cgm-sanctions-war-fallout/>

CMA CGM on Friday said intense shipping demand that swelled its earnings last year was continuing in early 2022 but the war in Ukraine was making the market outlook uncertain. Like other shipping groups, CMA CGM has halted services in Ukraine and Russia due to the war and related sanctions imposed by the West on Moscow.

Earlier on Friday, the French group said it was also suspending services to and from Russian ally Belarus. The suspension of services in the three countries, which represent about 2% of its sales, has not had a material effect on its results so far but CMA CGM said it was unable to predict the impact if the geopolitical and macro-economic context were to deteriorate. To assist humanitarian efforts, the group will make its air cargo capacity available to transport aid to Poland for Ukrainian refugees, it added.

Russian Oil Tankers Rerouting from Canadian Destinations

By Marianna Parraga and Laura Sanicola

[https://www.swissinfo.ch/eng/russian-owned-scf-oil-tankers-rerouting-from-canadian-destinations/47400606#:~:text=HOUSTON%20\(Reuters\)%20%2D%20Two%20oil,tracking%20data%20and%20marine%20sources.](https://www.swissinfo.ch/eng/russian-owned-scf-oil-tankers-rerouting-from-canadian-destinations/47400606#:~:text=HOUSTON%20(Reuters)%20%2D%20Two%20oil,tracking%20data%20and%20marine%20sources.)

HOUSTON, March 3 (Reuters) – Two oil tankers owned and managed by Russia's largest maritime and freight shipping company, Sovcomflot, which was blacklisted by the United States last week as part of sanctions against Russia, are rerouting from their Canadian destinations, according to tracking data and marine sources. The tankers are the first Russian-owned oil vessels to change course after Canada this week ratcheted up pressure on Russia for its invasion of Ukraine by [shutting ports](#) to Russian-owned ships and barring them from Canadian waters.



February 2022

January's TEU Numbers

By overwhelming popular demand, we will be accelerating the publication of this newsletter by setting a mid-month cutoff date for reporting the latest month's container trade statistics. What that means is that ports that have posted their January container numbers by February 17 will find those figures discussed in this edition. Those ports still counting or recounting their December tallies won't see their January numbers in this newsletter until next month's edition.

But before getting to those historic numbers, here's what we know so far about January 2022, with ports listed in order of their alacrity in posting their TEU statistics for the new year's first month.

The first major port to post its January TEU counts was **Savannah**, where inbound loads of 250,654 TEUs represented a 7.7% gain from a year earlier and a 32.8% jump over January 2020. Outbound loads, however, were down by 19.8% and 25.5% respectively from the two previous Januaries. Total container moves through the Georgia Port amounted to 476,713, up 3.7% from a year earlier and 26.2% ahead of the total number of TEUs the port handled in January 2020.

Just hours after Savannah posted its January numbers came those from the **Port of Long Beach**. The Southern California gateway recorded growth in TEU traffic across the board. Inbound loads were up 6.9% year-over-year to

389,334 TEUs, which was also an increase of 25.6% from January 2020. Outbound loads (123,060 TEUs) were also up by 5.9% from a year earlier and by 13.3% from January 2020. Total TEU moves through Long Beach in January amounted to 800,943 TEUs, up 4.8% year-over-year and up 27.8% from the first month of 2020.

Next to check in was the **Port of Charleston**, whose inbound traffic in January (117,181 TEUs) soared by 22.7% over the previous January. Export loads, though, meanwhile fell by 20.1% to 54,256 TEUs. Total container traffic through the South Carolina port nudged up by 4.7% from a year earlier to 226,515 loaded and empty TEUs.

The **Port of Houston** then weighed in with a 26.8% year-over-year increase in total TEU traffic (323,427 TEUs) in January. Inbound loads (158,569 TEUs) were up by 30.4% over the first month of the preceding year, while outbound loads (86,940 TEUs) were down by 12.8%. Box trade through the Texas port was boosted by a strong 211.4% jump in the number of empty outbound TEUs to 73,181 from 23,503 a year earlier.

Edging in just ahead of our deadline was the **Port of Los Angeles**, which established a new record for the first month of the year by processing 865,595 TEUs, a gain of 3.6% over January 2021. However, traffic in laden containers was down from a year earlier. Inbound loads (407,208 TEUs) were down 2.4%, while outbound loads

We Make Cargo Move



The Port
OF HUENEME





January's TEU Numbers *Continued*

(100,185 TEUs) were off by 16.0%. What boosted the port's January numbers was the 21.1% jump in empty outbound boxes to 336,936 TEUs, reflecting a concerted effort to slash the number of empty containers that had been piling up throughout Southern California in recent months.

Container traffic slackened in the Pacific Northwest in January from a year earlier on both sides of the border.

Laden imports at the **Northwest Seaport Alliance Ports of Tacoma and Seattle** dipped by 0.9% to 113,029 TEUs, but loaded exports plunged by 36.0% to 37,219 TEUs. The two Washington State ports handled a total of 272,281 TEUs in January, a 5.9% drop from January 2021.

Up in British Columbia, the **Port of Vancouver** is still struggling to regain its footing after storms ravaged the regional transportation infrastructure last November. Inbound loads at the Canadian port in January (131,926 TEUs) were down 18.2% from a year earlier, while export loads plummeted by 32.6% to 53,351 TEUs. Total container traffic (258,879 TEUs) was down 19.1% year-over-year.

Further north, the **Port of Prince Rupert** simply continues to struggle. January saw inbound loads dip to 41,471 TEUs, a 17.5% fall-off from a year earlier, while outbound loads dropped 22.0% to 12,967 TEUs. Even the port's trade in outbound empties fell 22.4% to 24,987 TEUs. Total container traffic declined 19.8% to 79,425 TEUs.

Finally, the **Port of Hueneme** posted a 49.2% jump in inbound loads to 9,284 TEUs in January, while outbound loads were up 65.0% to 2,610 TEUs. The niche port about 60 miles north of Los Angeles has lately benefited from container diversions from the San Pedro Bay ports.

For the Record: December and CY2021 TEU Numbers

Exhibit 1 displays inbound loaded TEU traffic in December. By far the most arresting revelation in the exhibit is that the Port of New York/New Jersey (PNYNJ) topped all U.S. ports in the number of loaded inbound TEUs in December. Its 392,348 inbound laden import TEUs topped not only the 258,687 TEUs handled by the Port of Long Beach, but also the 385,251 loads dispatched at the Port of Los Angeles. That had not happened in quite a while. Although the East Coast port may have occasionally eclipsed the Port of Long Beach in this category, the Port of Los Angeles had long dominated in import loads by fairly wide margins.

Overall, the U.S. ports we track handled 2.17 million inbound loads in December, a 0.6% dip from the 2.19 million TEUs the same ports had moved a year earlier. For the year, inbound loads totaled 26.75 million TEUs, up 16.7% over 2020. (By way of comparison, we note that the National Retail Federation's widely cited Global Port Tracker, which covers five fewer American ports than we at PMSA do, concluded that import loads in December totaled 2.09 million TEUs, a 1.0% year-over-year decline. NRF/GPT also found that 25.8 million laden TEUs arrived last year, a 17.4% bump over the previous year.)



PORT NEWARK-ELIZABETH MARINE TERMINAL, NEWARK BAY, JERSEY CITY

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Exhibit 1 December 2021 - Inbound Loaded TEUs at Selected Ports

	Dec 2021	Dec 2020	% Change	Dec 2019	% Change	Dec 2021 YTD	Dec 2020 YTD	% Change	Dec 2019 YTD	% Change
Los Angeles	385,251	460,865	-16.4%	373,511	3.1%	5,513,286	4,827,040	14.2%	4,714,266	16.9%
Long Beach	358,687	406,072	-11.7%	323,231	11.0%	4,581,848	3,998,341	14.6%	3,758,439	21.9%
San Pedro Bay Totals	743,938	866,937	-14.2%	696,742	6.8%	10,095,134	8,825,381	14.4%	8,472,705	19.1%
Oakland	79,055	90,220	-12.4%	81,281	-2.7%	1,055,614	995,976	6.0%	975,210	8.2%
NWSA	97,285	122,469	-20.6%	105,823	-8.1%	1,464,662	1,253,818	16.8%	1,369,251	7.0%
Hueneme	11,070	4,591	141.1%	5,141	115.3%	102,892	49,278	108.8%	59,848	71.9%
San Diego	5,798	5,460	6.2%	6,988	-17.0%	80,335	73,929	8.7%	71,726	12.0%
USWC Totals	937,146	1,089,677	-14.0%	895,975	104.6%	12,798,637	11,198,382	14.3%	10,948,740	16.9%
Boston	5,401	12,114	-55.4%	11,409	-52.7%	92,267	137,098	-32.7%	149,605	-38.3%
NYNJ	392,348	358,325	9.5%	288,964	35.8%	4,586,988	3,920,686	17.0%	3,770,971	21.6%
Maryland	49,438	45,041	9.8%	41,429	19.3%	506,299	523,266	-3.2%	524,225	-3.4%
Virginia	157,590	123,218	27.9%	103,711	52.0%	1,679,528	1,316,976	27.5%	1,366,381	22.9%
South Carolina	118,710	93,568	26.9%	81,779	45.2%	1,294,901	1,033,001	25.4%	1,066,314	21.4%
Georgia	238,309	224,650	6.1%	172,124	38.5%	2,801,201	2,306,631	21.4%	2,218,655	26.3%
Jaxport	29,584	27,906	6.0%	24,513	20.7%	316,942	317,626	-0.2%	349,896	-9.4%
Port Everglades	32,688	27,913	17.1%	27,133	20.5%	365,722	299,038	22.3%	318,187	14.9%
Miami	51,154	43,066	18.8%	39,645	29.0%	548,331	439,305	24.8%	445,238	23.2%
USEC Totals	1,075,222	955,801	12.5%	790,707	136.0%	12,192,179	10,293,627	18.4%	10,209,472	19.4%
New Orleans	11,656	12,362	-5.7%	11,916	-2.2%	128,039	138,450	-7.5%	135,456	-5.5%
Houston	148,301	128,593	15.3%	100,274	47.9%	1,634,025	1,296,522	26.0%	1,244,790	31.3%
USGC Totals	159,957	140,955	13.5%	112,190	42.6%	1,762,064	1,434,972	22.8%	1,380,246	27.7%
Vancouver	145,376	167,466	-13.2%	140,560	3.4%	1,909,972	1,797,582	6.3%	1,709,398	11.7%
Prince Rupert	57,596	59,141	-2.6%	54,481	5.7%	546,944	643,575	-15.0%	678,699	-19.4%
British Columbia Totals	202,972	226,607	-10.4%	195,041	4.1%	2,456,916	2,441,157	0.6%	2,388,097	2.9%
US/BC Total	2,375,297	2,413,040	-1.6%	1,993,913	19.1%	29,209,796	25,368,138	15.1%	24,926,555	17.2%
US Total	2,172,325	2,186,433	-0.6%	1,798,872	20.8%	26,752,880	22,926,981	16.7%	22,538,458	18.7%
USWC/BC Total	1,140,118	1,316,284	-13.4%	1,091,016	4.5%	15,255,553	13,639,539	11.8%	13,336,837	14.4%

Source Individual Ports



Exhibit 2 December 2021 - Outbound Loaded TEUs at Selected Ports

	Dec 2021	Dec 2020	% Change	Dec 2019	% Change	Dec 2021 YTD	Dec 2020 YTD	% Change	Dec 2019 YTD	% Change
Los Angeles	70,872	120,265	-41.1%	130,229	-45.6%	1,184,145	1,531,406	-22.7%	1,756,177	-32.6%
Long Beach	113,918	132,374	-13.9%	125,395	-9.2%	1,437,917	1,475,892	-2.6%	1,472,804	-2.4%
San Pedro Bay Totals	184,790	252,639	-26.9%	255,624	-27.7%	2,622,062	3,007,298	-12.8%	3,228,981	-18.8%
Oakland	55,724	75,330	-26.0%	74,643	-25.3%	852,374	927,799	-8.1%	931,019	-8.4%
NWSA	40,703	63,849	-36.3%	75,868	-46.4%	691,446	790,620	-12.5%	913,332	-24.7%
Hueneme	2,516	1,147	119.4%	1,285	95.8%	30,796	12,314	150.1%	14,956	105.9%
San Diego	866	384	125.5%	308	181.2%	6,704	3,516	90.7%	3,725	80.0%
USWC Totals	284,599	393,349	-27.6%	407,728	-30.2%	4,203,382	4,741,547	-11.3%	5,092,013	-17.5%
Boston	3,222	7,211	-55.3%	5,664	-43.1%	64,266	79,133	-18.8%	81,520	-21.2%
NYNJ	106,136	103,891	2.2%	110,768	-4.2%	1,358,730	1,321,043	2.9%	1,460,447	-7.0%
Maryland	22,102	22,269	-0.7%	17,857	23.8%	251,054	226,621	10.8%	232,957	7.8%
Virginia	88,667	82,670	7.3%	78,285	13.3%	1,049,588	940,684	11.6%	966,102	8.6%
South Carolina	57,132	67,239	-15.0%	61,903	-7.7%	814,964	774,811	5.2%	816,962	20.0%
Georgia	84,800	105,796	-19.8%	111,324	-23.8%	1,382,233	1,414,891	-2.3%	1,470,373	-6.0%
Jaxport	41,699	44,804	-6.9%	38,013	9.7%	575,669	512,203	12.4%	497,149	15.8%
Port Everglades	34,703	32,889	5.5%	31,995	8.5%	391,095	343,572	13.8%	427,423	-8.5%
Miami	26,827	27,051	-0.8%	35,034	-23.4%	338,696	343,267	-1.3%	416,466	-18.7%
USEC Totals	465,288	493,820	-5.8%	490,843	-5.2%	6,226,295	5,956,225	4.5%	6,369,399	-2.8%
New Orleans	17,657	22,792	-22.5%	24,304	-27.3%	246,704	278,560	-11.4%	299,511	-17.6%
Houston	90,660	106,908	-15.2%	109,721	-17.4%	1,068,982	1,230,921	-13.2%	1,265,669	-15.5%
USGC Totals	108,317	129,700	-16.5%	134,025	-19.2%	1,315,686	1,509,481	-12.8%	1,565,180	-15.9%
Vancouver	49,084	88,192	-44.3%	86,892	-43.5%	878,426	1,043,069	-15.8%	1,121,973	-21.7%
Prince Rupert	14,999	18,762	-20.1%	17,344	-13.5%	158,861	193,640	-18.0%	192,068	-17.3%
British Columbia Totals	64,083	106,954	-40.1%	104,236	-38.5%	1,037,287	1,236,709	-16.1%	1,314,041	-21.1%
US/BC Total	907,288	1,105,061	-17.9%	1,119,488	-19.0%	12,623,789	13,250,322	-4.7%	14,148,565	-10.8%
US Total	858,204	1,016,869	-15.6%	1,032,596	-16.9%	11,745,363	12,207,253	-3.8%	13,026,592	-9.9%
USWC/BC Total	348,682	500,303	-30.3%	511,964	-31.9%	5,240,669	5,978,256	-12.3%	6,406,054	-18.2%

Source Individual Ports



December 2021 TEU Numbers Continued

Exhibit 2 displays data on the numbers of outbound loaded TEUs last year. Apart from the two smaller California ports we monitor, the only North American ports that posted gains in outbound loads in December were PNYNJ, Virginia, and Port Everglades. The starkest contrast was between the 7.3% (+5,997 TEUs) year-over-year gain at Virginia and the 41.1% (-49,393 TEUs) drop at the Port of LA. Overall, the U.S. ports we track shipped 15.6% fewer outbound loads in December than they had a year earlier. For the year of 2021 as a whole, outbound loads at U.S. ports were down a more modest 3.8%.

Exhibit 3 shows the total (full + empty) container traffic for the past three calendar years. At the U.S. ports we monitor, overall box movements totaled 57.18 million TEUs, a 13.6% boost over 2020 and a 13.9% increase over 2019. Most ports showed increased traffic last year. That was certainly true of the nation's largest ports. However, Oakland, Maryland, New Orleans, and woeful Boston sustained declines, as did Prince Rupert in British Columbia.

Weights and Values

Even though the TEU is the customary metric for measuring containerized trade, we like to cite two alternative measures – the declared weight and value of the goods loaded into those TEUs – to determine the share of the nation's box trade that passes through U.S. West Coast ports. The percentages in Exhibits 4 and 5 are derived from data compiled by the U.S. Commerce Department from documentation submitted by the importers and exporters of record. Commerce then makes the data available with a time-lag of approximately five weeks.

Exhibit 3 Total TEUs (Loaded and Empty) at Selected Ports: 2019-2021

	2021	2020	% Change	2019	% Change
Los Angeles	10,677,610	9,213,396	18.7%	9,337,632	14.4%
Long Beach	9,384,368	8,113,318	18.3%	7,632,038	23.0%
San Pedro Bay Ports	20,061,978	17,326,714	18.5%	16,969,670	18.2%
NYNJ	8,985,929	8,215,176	19.5%	7,585,819	18.5%
Georgia	5,613,163	4,682,249	21.6%	4,599,172	22.0%
NWSA	3,736,206	3,320,379	15.4%	3,775,303	-1.0%
Vancouver	3,680,581	3,467,521	9.1%	3,398,860	8.3%
Virginia	3,522,834	2,813,415	25.2%	2,937,962	19.9%
Houston	3,453,266	3,001,164	15.6%	2,990,175	15.5%
South Carolina	2,751,442	2,309,995	19.3%	2,436,185	12.9%
Oakland	2,448,243	2,461,281	1.1%	2,500,461	-2.1%
Montreal	1,728,114	1,607,289	8.0%	1,745,244	-1.0%
JaxPort	1,377,417	1,295,289	7.7%	1,336,263	3.1%
Miami	1,244,090	1,070,616	16.7%	1,148,935	8.3%
Port Everglades	1,066,016	933,431	14.8%	1,033,460	3.2%
Prince Rupert	1,054,836	1,141,390	-8.4%	1,210,776	-12.9%
Maryland	1,019,407	1,051,840	-3.6%	1,073,688	-5.4%
Philadelphia	739,323	640,709	15.9%	598,274	23.6%
New Orleans	488,119	572,221	-13.7%	646,608	-24.5%
Hueneme	220,186	169,412	29.7%	122,594	79.6%
Boston	187,902	268,418	-27.3%	300,762	-37.5%
San Diego	157,755	147,533	7.1%	143,472	10.0%
Portland, Oregon	105,989	58,066	87.0%	26	4000%
US Total	57,179,265	50,337,908	87.0%	50,198,834	13.9%

Source Individual Ports



December 2021 TEU Numbers *Continued*

Exhibit 4 Major USWC Ports Shares of U.S. Mainland Ports Worldwide Container Trade, December 2021

	Dec 2021	Nov 2021	Dec 2020
Shares of U.S. Mainland Ports' East Asian Container Import Tonnage			
LA/LB	23.5%	25.3%	29.4%
Oakland	3.1%	3.2%	3.8%
NWSA	3.8%	3.9%	4.7%
Shares of U.S. Mainland Ports' East Asian Container Import Value			
LA/LB	30.0%	31.3%	34.9%
Oakland	2.7%	2.7%	3.5%
NWSA	5.0%	5.0%	6.0%
Shares of U.S. Mainland Ports' East Asian Container Export Tonnage			
LA/LB	30.0%	31.3%	34.9%
Oakland	2.7%	2.7%	3.5%
NWSA	5.0%	5.0%	6.0%
Shares of U.S. Mainland Ports' East Asian Container Export Value			
LA/LB	15.8%	15.9%	19.4%
Oakland	6.2%	8.7%	7.8%
NWSA	3.6%	3.6%	4.3%

Source: U.S. Commerce Department.

Exhibit 4 documents the year-over-year decline in the percentage of containerized imports through mainland U.S. ports that were discharged at USWC ports in December. In tonnage terms, the five major USWC maritime gateways saw their combined share drop to 30.4% from 37.9% a year earlier. Even when adding in the container traffic through smaller USWC ports like Hueneme, San Diego, and Portland, the overall USWC share of containerized import tonnage slid to 32.5% from 39.6% in December 2020.

On a value basis, 37.7% of the \$79.689 billion in containerized imports that entered mainland U.S. ports in December came through the five largest USWC ports, a 6.7% decline from December 2020. The total USWC share

Exhibit 5 Major USWC Ports Shares of U.S. Mainland Ports Containerized Trade with East Asia, December 2021

	Dec 2021	Nov 2021	Dec 2020
Shares of U.S. Mainland Ports Containerized Import Tonnage			
LA/LB	39.9%	43.1%	46.5%
Oakland	4.0%	3.8%	4.2%
NWSA	6.1%	6.1%	6.7%
Shares of U.S. Mainland Ports Containerized Import Value			
LA/LB	45.0%	48.5%	52.0%
Oakland	3.4%	3.3%	4.2%
NWSA	7.4%	7.4%	8.7%
Shares of U.S. Mainland Containerized Export Tonnage			
LA/LB	35.4%	33.9%	35.4%
Oakland	7.4%	10.8%	8.2%
NWSA	10.6%	10.9%	11.1%
Shares of U.S. Mainland Containerized Export Value			
LA/LB	34.6%	34.2%	37.0%
Oakland	10.0%	14.7%	12.2%
NWSA	7.9%	7.5%	7.9%

Source: U.S. Commerce Department.

rose to 39.3% when including traffic through the second-tier ports of California, Oregon, and Washington State.

On the export front, diminished shares were also the case for USWC ports in terms of containerized export tonnage and dollar value. Shipments from smaller USWC ports helped boost declining shares of the nation's containerized exports that sailed from USWC ports. Without their contributions, the USWC shares in December would have been lower by 0.9% in tonnage and by 0.8% in value.

Exhibit 5 displays the USWC shares of U.S. containerized trade with the Far East. Collectively, these five major USWC ports handled 50.0% of all containerized import



December 2021 TEU Numbers *Continued*

tonnage that entered U.S. mainland ports from the Far East in December. That was down from a year earlier when the same five ports received 57.4% of all containerized import tonnage from across the Pacific.

For those interested, the Port of New York/New Jersey saw its share of the nation's Far East import trade increase to 15.2% from 12.6% in December 2020. Its rival Mid-Atlantic Ports of Norfolk, Charleston, and Savannah likewise saw their combined share of containerized import tonnage from the Far East grow to 19.7% from 17.4% a year earlier.

In value terms, the USWC's five major ports sustained a drop in their collective share of containerized imports from the Far East to 55.8% from 64.9% in December 2020. Eleven years earlier, the same five ports accounted for 74.0% of the trade.

Factoid of the Month

Once upon a time, more than 70% of America's containerized trade with the Far East passed through ports on the U.S. Pacific Coast. By last year, that share was less than 56%. Until the consumer spending surge that began in the summer of 2020 mysteriously persuaded shippers that the West Coast ports -- whose efficiency they had previously maligned -- offered them their best bet for expeditiously moving containerized goods from the Far East to markets through the nation,

the share of Asian imports routed through the Port of Los Angeles and Long Beach had been dwindling. That, as **Exhibit 6** reveals, was the case even before the opening in June 2016 of a bigger set of locks in Panama accelerated the trend by affording passage to significantly larger vessels.

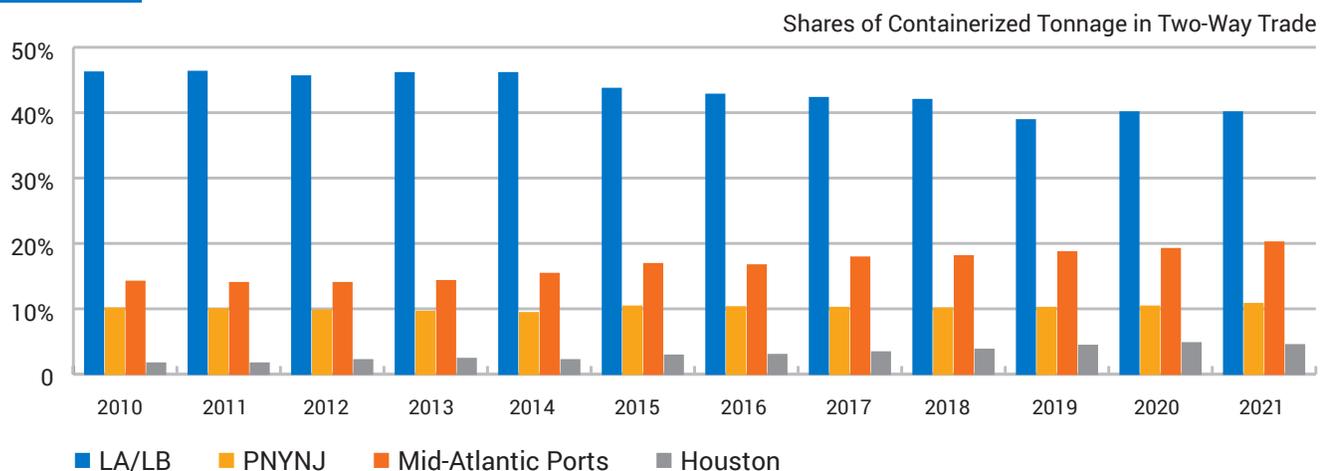
Why had this been happening? The biggest reason is that, particularly after China joined the World Trade Organization in 2001, the Far East was where the growth in global trade was taking off. Between 2005 and 2015, the volume of containerized trade between the U.S. and Europe had increased by just 11.9%. Meanwhile, containerized trade between the U.S. and the economies of the Far East had grown by 31.8%. With a growth differential that wide and with a new, larger set of locks soon to open in Panama, East and Gulf Coast ports -- aided by skads of federal dollars -- eagerly jockeyed for larger shares of the business.

The investments made by East and Gulf Coast ports have earned them steadily growing shares of the nation's trade with the Far East. That's hardly news. But what is often overlooked is how little effort seems to have gone into growing the USWC share of America's container trade with Europe, as **Exhibit 7** attests. For example, while the two San Pedro Bay ports' share of the European trade is up from a decade ago, it plateaued in the 5.3%-5.5% range before sliding to 4.7% last year.

Exhibit 6

Coastal Competition for the Far East Container Trade

Source: U.S. Commerce Department





December 2021 TEU Numbers *Continued*

Exhibit 7

Coastal Non-Competition for the European Container Trade

Source: U.S. Commerce Department

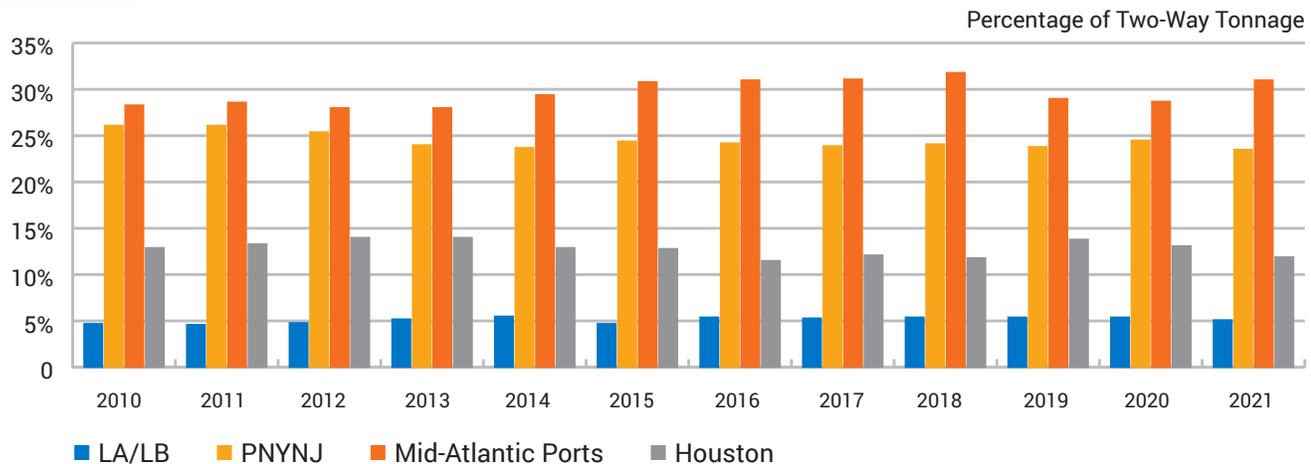
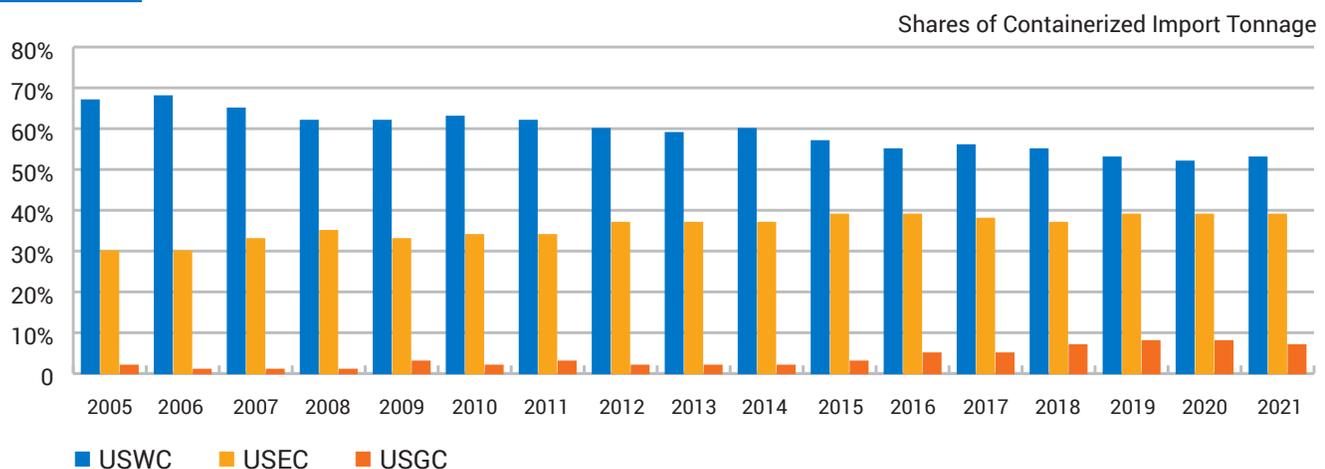


Exhibit 8

The Vietnam Import Trades: 2005-2021

Source: U.S. Commerce Department



Routing the Southeast Asia Import Trade

There's an old chestnut (well, maybe not that old) that, as more manufacturing activity shifts from China to countries in Southeast Asia, East Coast and Gulf ports would gain market share as more shipments moved to U.S. markets via Suez than across the Pacific.

Exhibit 8 tests that proposition and finds that, while USEC ports have certainly seen an upswing in containerized imports arriving from Vietnam, the gains mostly came in the years preceding 2015. That was when the USEC share of the import trade from Vietnam peaked at 39.4%

and has remained relatively flat ever since. Whatever additional gains USEC might have enjoyed were blunted by the run up in shipments from Vietnam arriving at Houston and other Gulf Coast ports. Their share, which was a meager 0.7% in 2007, had swelled to 8.3% in 2020 before tapering off last year. What's interesting about the Gulf Coast's growing share is the spurt that coincided with the opening of the enlarged Panama Canal in June 2016. In 2015, the USGC share of the Vietnam import trade was 2.8%. It then shot up to 4.8% the following year and then rose quickly before subsiding last year.



December 2021 TEU Numbers *Continued*

Savannah, Then and Now

We have data on containerized trade at the Port of Savannah going back to 2003, when China was the single largest source of containerized import tonnage. As **Exhibit 9** indicates, China back then accounted for 32.7% of the 4,864,968 metric tons of containerized imports Savannah handled. That was about one-fourth of last year's volume of 18,717,103 metric tons. Remarkably, though, China's share of the inbound tonnage was precisely the same last year as it was in 2003, 32.7%.

Other countries have seen their shares of Savannah's import trade shift, however. In 2003, Japan had a 5.5% share of Savannah's containerized import traffic. Brazil ranked third with a 4.7% share. By 2021, Brazil's share had slipped to 2.5%, which made it Savannah's tenth largest source of boxed import tonnage. Italy, which followed Brazil at 4.6% in 2003, saw its share slide to 2.5% last year.

Nuts

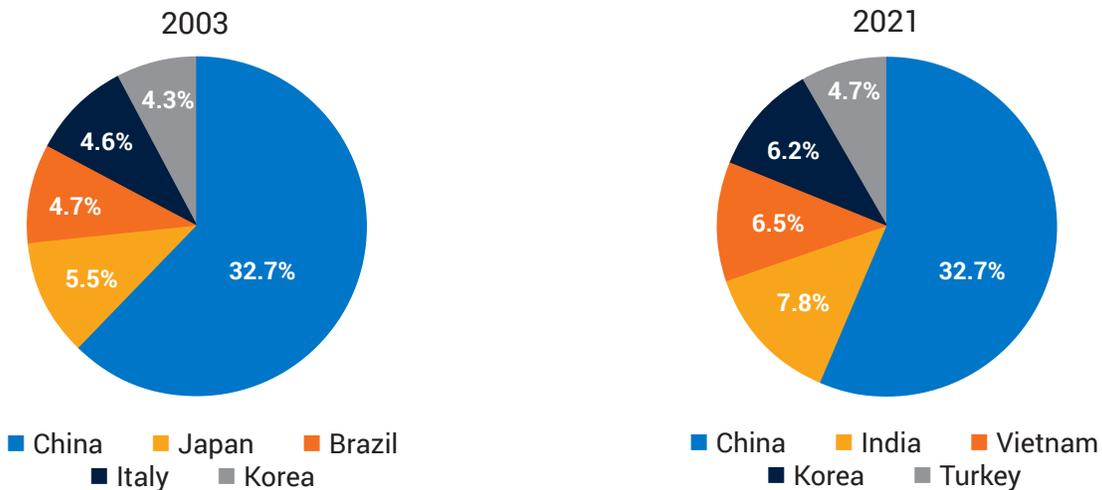
In California, at least, the politically incendiary topic of agricultural exports tends to focus on tree nuts. According to the Agricultural Issues Center at UC Davis, almonds, pistachios, and walnuts rank among the state's top five ag exports by value. (Wine and dairy products are the others.)

Statistics provided by the marketing organizations overseeing the three principal tree nut crops indicate that exports, at least by tonnage, have been off lately. In the fourth quarter of last year, almond export tonnage was down 20.9% from the same quarter in 2020. The California Walnut Board's statistics similarly show walnut export tonnage was down by an even 32.0%. The Administrative Committee for Pistachios reports that exports of its crop in the final quarter of 2021 were down by 16.6% year-over-year.

What about January's fresh off the tree numbers? Well, they're not going to quell the complaints we've been hearing about logistical snags thwarting farm exports.

The California Walnut Board is reporting a 15.1% year-over-year drop in Inshell Equivalent Tonnage, a measure that blends shipments of shelled and unshelled walnuts. Meanwhile, the California Almond Board says that January's exports were down 18.4% from a year earlier. Finally, the Administrative Committee for Pistachios states that export tonnage was down 4.5% year-over-year in January. So nut so good.

Exhibit 9 **Leading Origins of Savannah's Containerized Import Tonnage**
Source: U.S. Commerce Department





Jock O'Connell's Commentary:

The Great TEU/GDP Scandal of December 2021

News of an outrageous, if ultimately preposterous conspiracy involving the Port of Los Angeles and the Biden administration drifted my way during the late afternoon of January 27.

I was idly, almost absentmindedly scrolling through Twitter, a diversion I'd been resorting to largely to avoid the Wordle obsession that has tragically claimed so many productive minds. It was a Thursday and, memorably, the day on which the Port of Los Angeles had finally gotten around to posting its December cargo statistics.

Like others who track maritime trade statistics, I had been more than mildly irked by the Southern California port's sluggishness in sharing its December TEU tallies. But whatever irritation I felt did not lessen my astonishment at what popped up on my computer screen from a Twitterer who had nearly 168,000 followers and a strong affinity for Donald Trump.

Here's how the thread read, albeit leavened here with my unvoiced comments:

(1) Remember me asking why the Port of Los Angeles was not updating their December CARGO results? Remember me asking about why this unusual delay?

No, but please go on.

(2) The BEA released their fourth quarter GDP data today.

Yes, the Bureau of Economic Analysis reported that U.S. GDP had risen at an annualized rate of 6.9% in the last quarter. It was in all the papers. *The Wall Street Journal* described it as the quickest rebound from an economic downturn in decades. But what does the BEA report have to do with LA's tardy container statistics?

(3) A few hours later, again today, the Port of Los Angeles finally released their December totals. You know why that matters?

No, but I fear you're about to educate me.

(4) Because imports are deductions to the GDP equation. By holding back the Dec port data, the import number to the BEA equation couldn't be deducted, The GDP data is manipulated

(inflated) by not deducting the value of the December imports.

You obviously have no idea what you're talking about, do you?

(5) Wasn't there a recent visit to the port of LA by someone attached to the White House. Someone with a vested interest in manipulating the economic data to fit a fraudulent effort that began in October???

[At this point, the Twitterer posted a photo of Transportation Secretary Buttigieg, touring not the Port of Los Angeles but the Port of Long Beach next door. But, hey, whatever.]

From there, the thread scampers down a rabbit hole. Fiddling with the December trade numbers, it turns out, was just the tip of the iceberg (or maybe the coat of rust on the hull of the Queen Mary). Trotting out performance data from the two San Pedro Bay ports, the Twitterer directed the attention of his numerous followers to the nearly steady ebbing of imported boxes since last May's peak. The numbers, the Twitterer insisted, revealed the depth of the conspiracy. Despite a growing fleet of container ships waiting offshore, the two ports handled almost 240,000 fewer imported TEUs in December than they had in May.

The conclusion, the Twitterer boasted, was unmistakable. The scheme to inflate GDP numbers was months-old, which the Twitterer submitted should come as no surprise given "the ideological outlook behind the people running the Port of Los Angeles, the politics of California, and the influence of White House supply chain task force member John Porcari as Ports Envoy."

So, apparently, we're to believe that the Biden administration and its running-dog lackeys at the Port of LA had been colluding for months to slow the pace of imported containers not only at LA but at neighboring Long Beach? And all for the sake of producing reports on the state of the nation's economy that flattered Joe Biden, but which were actually bogus?

The key incendiary lesson the Twitterer's followers



Commentary Continued

presumably took away was that the shelves down at the corner store are empty and food prices are rising solely because the White House wants to keep GDP high by keeping imports low. *Quod erat demonstrandum.*

What to make of this?

It would be easy to shrug this nonsense off as a classic example of taking a little knowledge the wrong way. Shortly after issuing this expose, the Twitterer meandered off to celebrate militantly unvaxed Canadian truckers. Shiny objects seem to be an occupational hazard among the Twitterati.

But what's disturbing is that a cockeyed theory that Joe Biden had somehow persuaded LA Port Chief Eugene D. Seroka to stifle the December container count received 6,134 'likes' and 4,286 "retweets" over the next few days.

The Twitterer was almost correct in one regard. Imports (i.e., goods produced elsewhere) are a negative in calculating GDP. After all, GDP stands for Gross Domestic Product.

But that doesn't prove that the Biden administration, in collusion with his co-conspirators at the Port of LA, delayed reporting the port's December TEU statistics so that BEA could goose the fourth quarter GDP number with doctored data.

Nor does LA's delay in going public with its December trade numbers establish that the White House and its ideological lapdogs at the Port had been conspiring all fall to thwart imports and thus slash the numbers that would reduce GDP.

Why is that?

Because not the least of the cavernous holes in the Twitterer's argument is the central fact that BEA does not

use container traffic data from the ports in calculating the nation's GDP.

Indeed, had the ports been the source of import statistics used by the BEA, the distortion would have been greater than the Twitterer had even imagined. For it was not until the second week of February that the Port Authority of New York/New Jersey posted its December container counts.

In reality, the Bureau of Economic Analysis obtains its import/export numbers from the Foreign Trade Division of the U.S. Census Bureau, which tabulates the data shippers routinely submit by law to Customs and Border Protection. In adding (or subtracting) the various components that make up GDP, BEA doesn't count numbers of containers (which typically contain goods with very wide valuations). There is no need to withhold a GDP report until all TEUs have been counted because TEUs don't factor into the analysis. It's rather the chief metric used by the maritime shipping industry to manage space on ships and on shore.

Yes, I can anticipate the Twitterer's rejoinder. What difference does it make if BEA doesn't need container traffic data from the ports but instead uses Census Bureau figures? They're all just gubmint numbers, which clearly can't be trusted. There's a conspiracy here and if it isn't taking place down at the ports, it must be taking place somewhere else.

Maybe even in the basement of a Washington, D.C. pizza shop.

Disclaimer: The views expressed in Jock's commentaries are his own and may not reflect the positions of the Pacific Merchant Shipping Association.



CONFERENCE: MAY 9-12, 2022
EXPO HALL: MAY 9-11, 2022
LONG BEACH CONVENTION CENTER



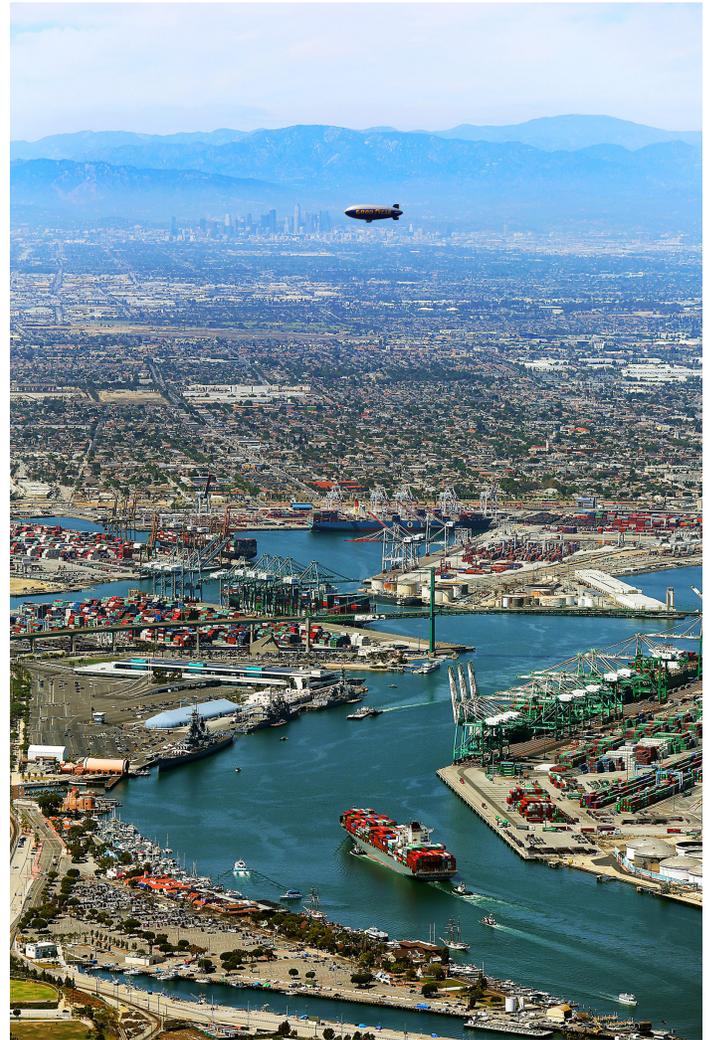


A Money Grab?

By Thomas Jelenić, Vice President, Pacific Merchant Shipping Association

The answer, in California, is “obviously.” But it is reasonable to ask which money grab we are talking about. Since the 2006 Clean Air Action Plan (CAAP), the ports of Long Beach and Los Angeles have significantly reduced emissions and since the 2017 re-boot have been working toward achieving their goals of zero-emission cargo-handling equipment by 2030 and drayage trucks by 2035, while reducing emissions from all other sources by as much as feasible. The rub, of course, is that the technology does not currently exist, but we are getting closer. Hence, the ports, their terminal partners, and State agencies have been funding tens of millions of dollars in port-related demonstration projects. None have been successful in the sense that there is not yet non-automated zero-emissions equipment that can effectively replace existing diesel equipment. All have been successful in the sense that they materially advanced the state of technology to achieve our collective zero emissions goals¹. Suffice it to say, technology advancement is expensive but actual deployment will be more expensive. Billions more expensive. The challenges are obviously large.

With so much money at stake, it should come as no surprise that some want control. On February 4th, the South Coast Air Quality Management District (SCAQMD) formally pivoted from negotiating a memorandum of understanding (MOU) with the ports on the implementation of the CAAP to rulemaking on an indirect source rule (ISR). In the lead up to February, SCAQMD denigrated the ports efforts on the CAAP. In presentations, SCAQMD made demonstrably false contentions that emission reductions from the CAAP are actually attributable to the California Air Resources Board (CARB) regulation. While CARB regulation is important in leveling the playing field statewide, it is important to remember that the San Pedro Bay drayage fleet was turned over before the Drayage Truck Rule went into effect, that many terminals had shore power requirements before there was an At Berth Rule, and that cargo-handling equipment (CHE) was being turned over before there was a CHE rule. Ultimately, SCAQMD staff framed the issue as a



Courtesy Port of Los Angeles

choice between real emission reductions under an ISR against insufficient emission reductions from the CAAP. Of course, SCAQMD staff offered nothing to demonstrate that was true and implied emissions reductions that can only be described as fantastical and beyond any known technology.

What can we expect from an ISR? It is not really known but if the warehouse ISR is a guide, there is a lot to be worried about. The warehouse ISR, focused on reducing emissions from trucks, requires that facilities make improvements from a menu of options to earn points. But the real meat of the measure is that a shortfall of points triggers the need to make up the difference in mitigation fee payments. Of course, the ports already have a comprehensive truck program. It will also be backed up by requirements from CARB that will likely accelerate the



A Money Grab? Continued

transition this time. What will terminals, which have no contractual relationship with trucking companies, do? Probably pay a fee, probably a big one. And that will divert resources from the enormous cost to transition their own fleet to zero emissions.

That raises a number of questions, including how does that benefit the community? And where will the money be spent? SCAQMD has supposedly been motivated by the need for early action. SCAQMD's mantra has been emission reductions are needed now; available technologies should be deployed now rather than waiting on zero-emissions technologies. For my part, I agree. Yet, SCAQMD has now rejected their own argument for accelerated action and is opting for legally dubious rulemaking that will take 12-18 months to put in place by their estimation. More time would be needed before any action attributable to their proposal takes place. Given SCAQMD's track record of spending the millions in port money that it already has access to, I remain skeptical that they can meaningfully impact the transition. More likely, the transition will happen through the ports and CARB's direct action, while SCAQMD will drain resources and delay the transition within the ports themselves.

And in another example of a money grab, SCAQMD staff proposed an illegal tax on February 11th to create an additional source of funds. Unfortunately, we have been down this road before, many times. Ignoring for a

moment that SCAQMD's proposed "fee" is an illegal tax on interstate commerce (among other failings), it is also plainly absurd. It is supposed to help the ports transition to zero emissions. That makes as much sense as the State taxing you in order to help you buy a car. SCAQMD levying a tax on the international trade that is responsible for the transition does not make more resources available! After SCAQMD takes their cut, it makes less resources available. The biggest challenge today remains the technology as previously noted.

What is needed are more demonstrations that will ultimately inform the CARB's rulemaking process for cargo-handling equipment that will get underway this year. It also would not hurt to have a single statewide approach on achieving the transition to zero emissions, rather than one agency with statutory authority (CARB) and another seeking to grab their own slice of money and power.

1. As a side note, too many refuse to acknowledge the "failures" of demonstration projects out of some sense that recognition of "failure" can only mean the money was wasted – where we should, instead, acknowledge that the knowledge of those "failures" was purchased to advance technology. If we knew the equipment already worked, then the demonstration would truly have been a waste of money.

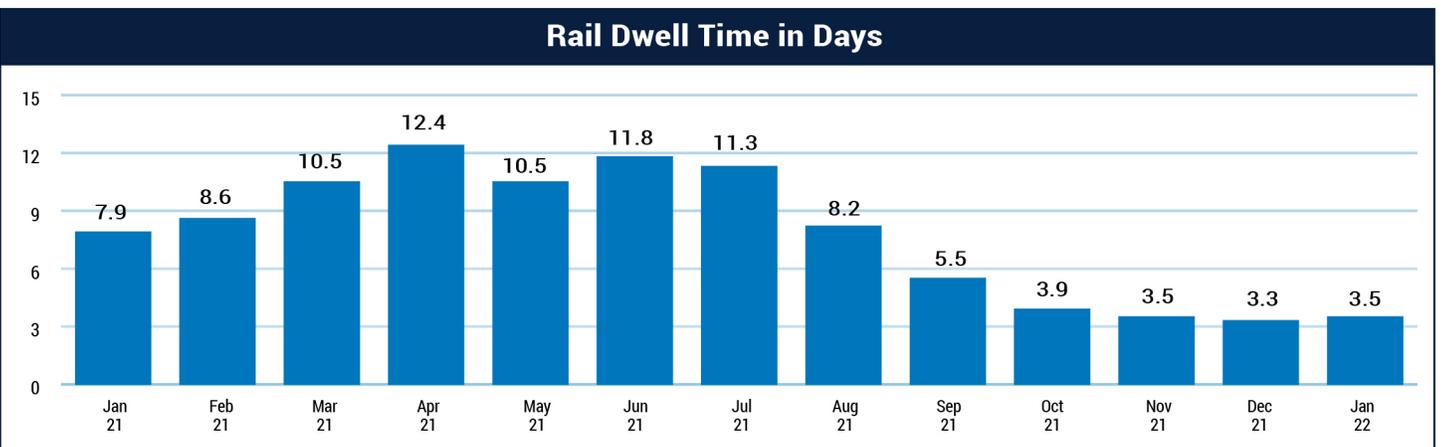
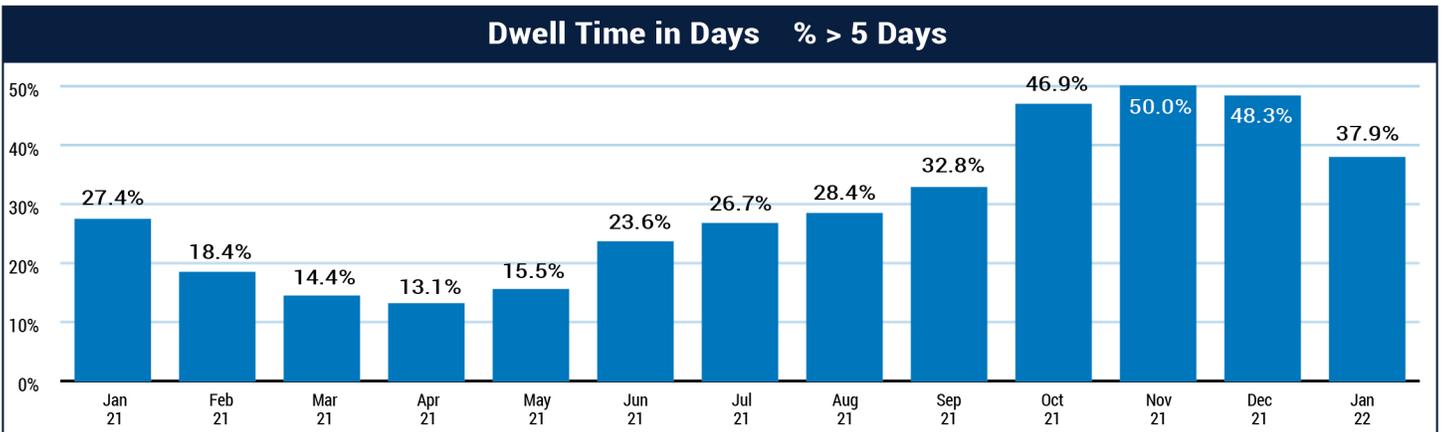
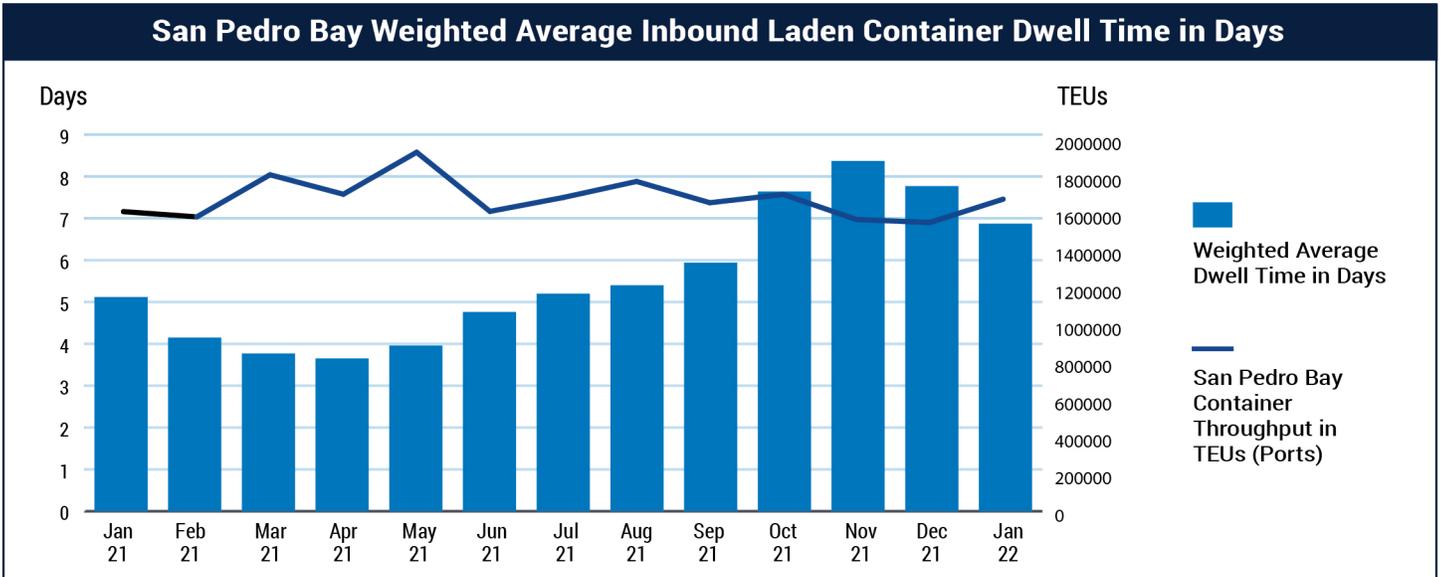


Protecting Blue Whales and Blue Skies
 Vessel Speed Reduction Incentive Program
 A partnership for cleaner air,
 safer whales, and a quieter ocean
<https://www.bluewhalesblueskies.org>

Interested in membership in PMSA?
 Contact Laura Germany for details at: lgermany@pmsaship.com or 510-987-5000.



Import Dwell Time Is Down For January; Rail Dwell Time Is Up



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STATE OF WASHINGTON
BOARD OF PILOTAGE COMMISSIONERS
 2901 Third Avenue, Suite 500 | Seattle, Washington 98121 | (206) 515-3904

www.pilotage.wa.gov
HamelJ@wsdot.wa.gov or BeverJ@wsdot.wa.gov

PETITION FOR PILOTAGE EXEMPTION

Petition Instructions:

- Please submit completed petitions to the Board of Pilotage Commissioners at least thirty (30) days prior to arrival in Washington waters.**
 See [WAC 363-116-360 Exempt Vessels](#) for more information.
- Your application should include the following:
 - Certificate of Vessel Registry
 - Certificate of Financial Responsibility
 - Vessel's Insurance Coverage
 - Valid License of Vessel Captain
 - Signed Vessel Certification (Page 5 of Petition)
 - Photo of Vessel
 - Asian Gypsy Moth (AGM) Certification (If applicable)
- Petitions will be considered at the scheduled monthly meetings of the Board of Pilotage Commissioners. The monthly meeting schedule can be found on our website at <https://pilotage.wa.gov/meetings.html>.
- Schedule of Fees:

	3 Months or Less	1 Year or Less	Annual Renewal
A. YACHTS			
Up to and including 50 feet LOA	\$ 50	\$ 50	\$ 50
Up to and including 100 feet LOA	\$ 700	\$ 1,000	\$ 600
Up to and including 200 feet LOA and 750 gt	\$ 1,000	\$ 1,400	\$ 800
Up to and including 200 feet LOA and 751 to 1,300 gt	\$ 1,500	\$ 1,500	\$ 1,500
B. PASSENGER VESSELS			
Up to and including 100 feet LOA	\$ 1,125	\$ 1,500	\$ 1,000
Up to and including 200 feet LOA	\$ 1,500	\$ 1,500	\$ 1,200

Please make payments to: **Washington State Treasurer**
Mail to: Board of Pilotage Commissioners, 2901 Third Avenue, Suite 500; Seattle, WA 98121
Currently, we are unable to accept cash, credit cards, or any form of electronic payment.

The Washington Public Records Act, [Chapter 42.56 RCW](#), requires us to promptly make identifiable public records available for inspection and provide records upon request.

VESSEL NAME: _____

START DATE OF REQUESTED PILOTAGE EXEMPTION: _____

Vessel Information:

Length Of Exemption:	<input type="checkbox"/> 3 months <input type="checkbox"/> 1 year	New Vessel <input type="checkbox"/>
Country of Registry:		
Type and Use:	Type: <input type="checkbox"/> Sailing Yacht <input type="checkbox"/> Motor Yacht <input type="checkbox"/> Passenger Vessel Use: <input type="checkbox"/> Pleasure <input type="checkbox"/> Other _____	
LOA:		
Gross Tonnage (International) IGT:		
Fuel Type Onboard:		
Fuel Quantity Onboard: (maximum)		

Primary Vessel Captain:

Name:	
Address:	
Phone & Email:	
Country Of Licensure:	<input type="checkbox"/> License Matches Vessel Tonnage. If not, please explain: _____

Primary Vessel Captain Experience in Local Waters:

<p>San Juan Islands Region: Length of Time in the Area: _____</p> <p><input type="checkbox"/> I have no experience in Washington Waters</p>	<p>Northern Puget Sound:</p> <input type="checkbox"/> Bellingham Channel <input type="checkbox"/> Deception Pass <input type="checkbox"/> Guemes Channel <input type="checkbox"/> Saddle Bags Pass Length of Time in the Area: _____	<p>Seattle Area:</p> <input type="checkbox"/> Duwamish River <input type="checkbox"/> Hiram M. Chittenden Locks <input type="checkbox"/> Montlake Cut Length of Time in the Area: _____	
	<p>Central Puget Sound:</p> <input type="checkbox"/> Agate Pass <input type="checkbox"/> Hood Canal <input type="checkbox"/> Rich Pass Length of Time in the Area: _____	<p>South Puget Sound:</p> <input type="checkbox"/> South of Point Defiance Length of Time in the Area: _____	

Secondary Vessel Captain:

Name:	
Address:	
Phone & Email:	
Country of Licensure:	<input type="checkbox"/> License Matches Vessel Size. If not, please explain _____

Secondary Vessel Captain Experience in Local Waters:

<p>San Juan Islands Region: Length of Time in the Area: _____</p> <p><input type="checkbox"/> I have no experience in Washington Waters</p>	<p>Northern Puget Sound:</p> <p><input type="checkbox"/> Bellingham Channel <input type="checkbox"/> Deception Pass <input type="checkbox"/> Guemes Channel <input type="checkbox"/> Saddle Bags Pass</p> <p>Length of Time in the Area: _____</p>	<p>Seattle Area:</p> <p><input type="checkbox"/> Duwamish River <input type="checkbox"/> Hiram M. Chittenden Locks <input type="checkbox"/> Montlake Cut</p> <p>Length of Time in the Area: _____</p>
	<p>Central Puget Sound:</p> <p><input type="checkbox"/> Agate Pass <input type="checkbox"/> Hood Canal <input type="checkbox"/> Rich Pass</p> <p>Length of Time in the Area: _____</p>	<p>South Puget Sound:</p> <p><input type="checkbox"/> South of Point Defiance</p> <p>Length of Time in the Area: _____</p>

Owner of Vessel or Vessel Management Company:

Name:	
Address:	
Phone and Email:	
Vessel Agent Info (If Applicable):	

Information Regarding Visit:

Purpose of Visit:	
Length of Stay:	

Voyage Plan (Check all regions/channels/passes you intend to visit):

<p>San Juan Islands Region:</p> <input type="checkbox"/> Cattle Pass <input type="checkbox"/> Harney Channel <input type="checkbox"/> Lopez Pass <input type="checkbox"/> New Channel <input type="checkbox"/> Obstruction Pass <input type="checkbox"/> Peavine Pass <input type="checkbox"/> San Juan Channel <input type="checkbox"/> Spieden Channel <input type="checkbox"/> Thatcher Pass <input type="checkbox"/> Upright Channel <input type="checkbox"/> Wasp Pass	<p>Northern Puget Sound:</p> <input type="checkbox"/> Bellingham Channel <input type="checkbox"/> Deception Pass <input type="checkbox"/> Guemes Channel <input type="checkbox"/> Saddle Bags Pass	<p>Seattle Area:</p> <input type="checkbox"/> Duwamish River <input type="checkbox"/> Hiram M. Chittenden (Ballard) Locks <input type="checkbox"/> Montlake Cut
<p>Central Puget Sound:</p> <input type="checkbox"/> Agate Pass <input type="checkbox"/> Hood Canal <input type="checkbox"/> Rich Pass		<p>South Puget Sound:</p> <input type="checkbox"/> South of Point Defiance
<p>Other: Please provide location if not listed:</p>		
<p>Please provide specific dates intending to be in area: _____</p>		
<p style="color: red;">If your voyage includes Deception Pass, Ballard Locks or Duwamish River (Restricted Areas) you must complete pages 6 - 8.</p>		

Watchstanding Crew List: (May attach a separate list but must include the information requested below)

Name:		Name:	
Position:		Position:	
Speaks English:	Yes <input type="checkbox"/> No <input type="checkbox"/>	Speaks English:	Yes <input type="checkbox"/> No <input type="checkbox"/>
Name:		Name:	
Position:		Position:	
Speaks English:	Yes <input type="checkbox"/> No <input type="checkbox"/>	Speaks English:	Yes <input type="checkbox"/> No <input type="checkbox"/>

Additional Information:

List any propulsion, navigation, or communication equipment not currently operational:	
Navigational aids on board:	<input type="checkbox"/> VHF Radios <input type="checkbox"/> Magnetic compass <input type="checkbox"/> Gyroscopic compass <input type="checkbox"/> Satellite compass <input type="checkbox"/> Radar <input type="checkbox"/> Automatic radar plotting aid (ARPA) <input type="checkbox"/> Global Positioning System (GPS) <input type="checkbox"/> Electronic Chart System (ECS) <input type="checkbox"/> Electronic Chart Display & Information System (ECDIS) <input type="checkbox"/> Automated Identification System (AIS) <input type="checkbox"/> Depth sounder

CERTIFICATION

Vessel Name: _____

By my signature below I certify that I am authorized to make this application on behalf of the vessel named; that the person(s) listed as captain(s) in the Petition for Exemption meets/meet all the qualifications set by the flag state (country of vessel registry) to act as captain of the vessel in Washington waters; and that no other person(s) will act as captain of the vessel during the period of the exemption. I further certify that I understand and will ensure that any person acting as captain of the vessel understands the following:

1. Navigation in Washington waters in the Puget Sound or Grays Harbor Pilotage Districts area can involve many hazards such as high traffic areas including large commercial vessels, multiple recreational vessels, etc.; use of Vessel Traffic Service routes; unique radio communication requirements and channels; relatively extreme tides and currents; etc.

2. If an exemption is granted, prior to navigating in Washington pilotage waters, appropriate navigational equipment and supporting documents including – but not limited to - the following items will be available on board the vessel and the captain will be familiar with them:

a. The Puget Sound Vessel Traffic Service Users Manual.

Available on-line: <http://www.uscg.mil/d13/psvts/docs/userman032503.pdf>

b. Information on local VHF radio communications.

see, e.g., http://www.byc.org/weather_radio/vhfchannels.html

c. Those portions of the United States Coast Pilot – 7: Pacific Coast that cover any area in which the vessel will be navigated.

Available on-line: <http://nauticalcharts.noaa.gov/nsd/cpdownload.html>

d. Local tide and current information.

Such as that available on-line: <http://tidesandcurrents.noaa.gov/index.shtml>

e. Puget Sound Harbor Safety Plan.

Available on-line: http://www.pshsc.org/about/harbor_safety_plan

f. Pilot Familiarization Packet. Available on-line: <https://pilotage.wa.gov/pilotage-exemptions.html>

g. Paper or electronic charts of all areas to be navigated, updated and of appropriate scale.

USCG Local Notice to Mariners. Available on-line: <https://www.navcen.uscg.gov/?pageName=InmDistrict®ion=13>

3. As provided in RCW 88.16.070, if an exemption is granted, it shall not be detrimental to the public interest in regard to safe operation preventing loss of human lives, loss of property and protecting the marine environment. The Board may, at any time, review the exemption and revoke it should it find the vessel is not in compliance with the requirements for exemption (including operation of the vessel in a manner that is not considered safe).

4. I understand that in 2019 new regulations regarding Southern Resident Killer Whales (SRKW) went into effect and I am required to stay at least 300 yards away of either side of a SRKW path and 400 yards out of the path, in front and behind Orcas. If an Orca approaches your vessel within 300 yards, you must disengage your vessels transmission and allow the whale to safely pass. See RCW 77.15.740 for more information.

Signature of Vessel Owner or Representative

Date

GEOGRAPHICALLY RESTRICTED AREAS:

Deception Pass/Ballard Locks/Duwamish River

Applicants for these areas will have the requirement for a Pilot Orientation with a Washington State licensed Pilot waived if they meet certain criteria below. Please check all boxes that apply.

- Vessel Less than 65'**
- Has read Familiarization Package
 - Deception Pass
 - Understands tidal and daylight restrictions
 - Ballard Locks
 - Duwamish River
-

- Vessel 65' to less than 125'**
- Has read Familiarization Package

Vessel Captains experience for restricted areas:

- Deception Pass**
- Date _____ Vessel _____ Position _____
- Date _____ Vessel _____ Position _____
- Understands tidal and daylight restrictions

List 2 most recent trips above. Total trips taken in Deception Pass _____

- Ballard Locks**
- Date _____ Vessel _____ Position _____
- Date _____ Vessel _____ Position _____

List 2 most recent trips above. Total trips taken in Ballard Locks _____

- Duwamish River**
- Date _____ Vessel _____ Position _____
- Date _____ Vessel _____ Position _____

List 2 most recent trips above. Total trips taken in Duwamish River _____

Note: A Captain who has previously received a Pilot Orientation with a Washington State licensed Pilot will have satisfied the experience requirement above for the area of the orientation.

Previous Pilot Orientation
Date _____ Vessel _____ Areas _____

Explanation of local experience

Vessels 125' to less than 200'

Has read Familiarization Package

Vessel Captain's experience for restricted areas

Deception Pass
Date _____ Vessel _____ Position _____

Date _____ Vessel _____ Position _____

Understands tidal and daylight restrictions

List 2 most recent trips above. Total trips taken in Deception Pass _____

Ballard Locks
Date _____ Vessel _____ Position _____

Date _____ Vessel _____ Position _____

List 2 most recent trips above. Total trips taken in Ballard Locks _____

Duwamish River
Date _____ Vessel _____ Position _____

Date _____ Vessel _____ Position _____

List 2 most recent trips above. Total trips taken in Duwamish River _____

Note: A Captain who has previously received a Pilot Orientation with a Washington State licensed Pilot will have satisfied the experience requirement above for the area of the orientation.

Previous Pilot Orientation
Date _____ Vessel _____ Areas _____

Explanation of local experience

(End of Petition)



FOREIGN YACHT FAMILIARIZATION PACKET

Washington State Board of Pilotage Commissioners

2901 3rd Ave, Suite 500
Seattle, WA 98121
(206) 515-3904
www.pilotage.wa.gov

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INTRODUCTION

The State of Washington Board of Pilotage Commissioners (BPC) is provided the authority under [WAC 363-116-360](#) and [RCW 88.16.070](#) to grant exemptions from compulsory pilotage to certain foreign-flagged yachts.

Please note: This familiarization packet is provided for informational purposes only and does not constitute a law, rule, or order of the Board of Pilotage Commissioners. In the event of a conflict between this packet and any applicable law, regulation, or BPC policy, the law, regulation, or policy shall control. The BPC does not guarantee the accuracy or currentness of any information in this packet. Nothing contained herein shall waive, alter, or override the Captain's responsibility to ensure the safety of the vessel and comply with all applicable state and federal laws and regulations.

Add Geographic Restricted area information

Applicants for pilotage exemptions shall certify in their BPC Exemption Petition that they have reviewed this Familiarization Packet.

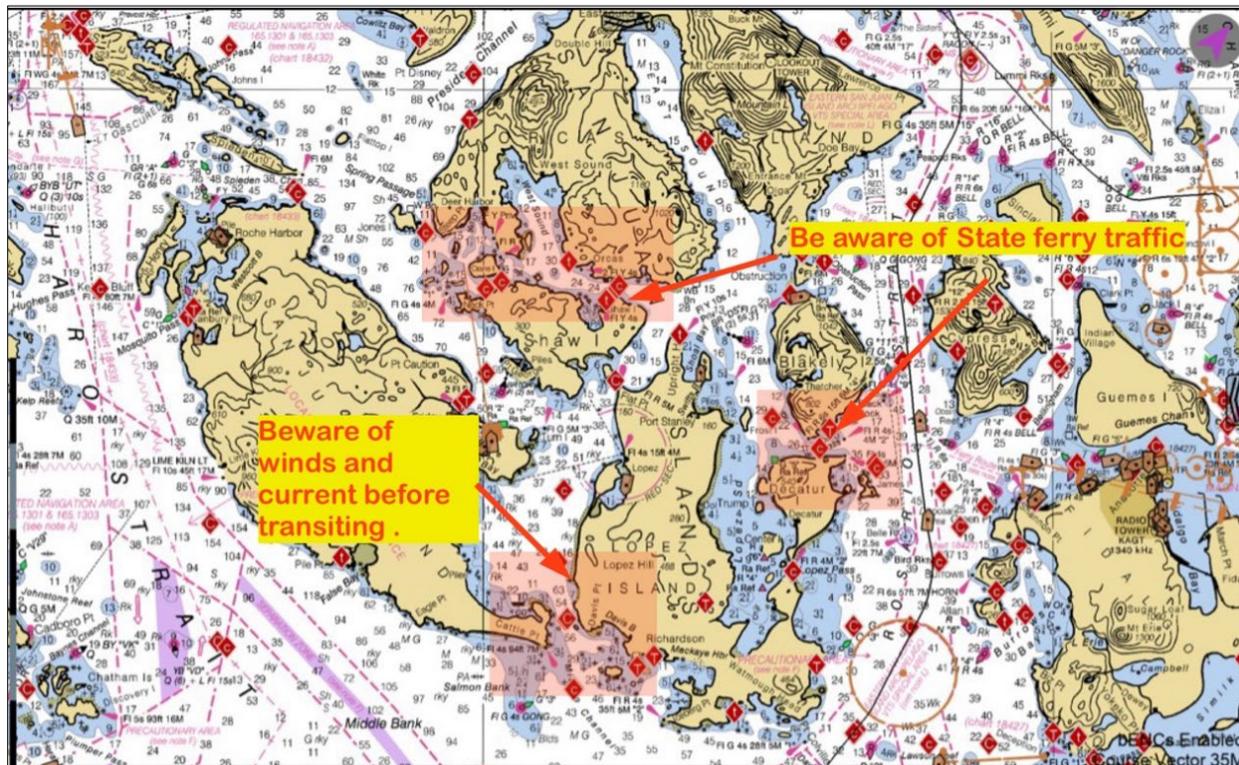
The current editions of the following documents should be QUICKLY ACCESSIBLE on board the vessel.

1. [VTS USER MANUAL](#)
2. [COAST PILOT 10](#)
3. [TIDE AND CURRENT INFORMATION](#)
4. [HARBOR SAFETY PLAN](#)
5. CURRENT PAPER/ELECTRONIC NAVIGATIONAL CHARTS
6. [USCG NAVIGATION RULES AND REGULATIONS HANDBOOK](#)

BROAD DESCRIPTIONS OF AREAS OF CONCERN

1. SAN JUAN ISLANDS

In the summer months, there is a great deal of recreational traffic throughout the San Juan Islands. Particular caution needs to be taken to avoid Washington State ferry traffic. The chartlet below shows some areas to take caution.



a. ANCHORING SAN JUAN ISLANDS IN GENERAL

During the summer months, the San Juan Islands are a very popular destination for recreational boaters. Anchorages fill up quickly in the early afternoon, as most boaters find an anchorage early. Due to the volume of vessels at anchor and at close proximity in Sucia Island, Jones Island, and Stuart Island Marine Parks, some vessels stern tie to shore. Other than public parks, most uplands and some tidelands are not trespass, private property.

b. ANCHORING FRIDAY HARBOR

Friday Harbor has a Washington State Ferry Terminal and ferries transit North of Brown Island on approach. Vessels should stay well clear of the ferries transiting to/from Friday Harbor and anchor well clear of their route. There is a significant amount of current at the entrance to Friday Harbor, but larger yachts have anchored outside of Friday Harbor to the West of Brown Island. An alternative anchorage used less frequently is to the South of Brown Island and to the East of the Friday Harbor Ferry Dock.

c. TRANSITING CATTLE PASS

Cattle Pass separates San Juan Island and Lopez Island and currents reach nearly 5 kts almost daily. Therefore, it is best to transit Cattle Pass at slack water, in hand steering and with vigilance as there are several tiderips.

d. VOLUNTARY NOGO ZONE

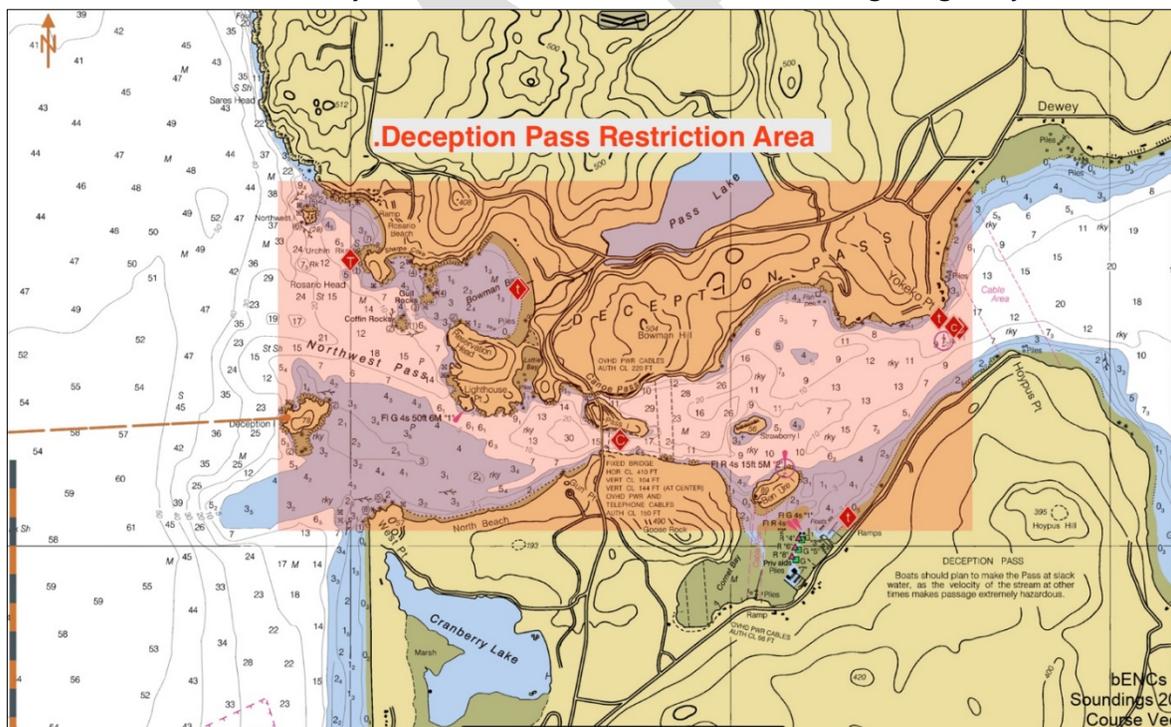
In order to help protect whales, vessels are asked to avoid the Voluntary NoGo Zone on the west side of San Juan Island, extending ¼-mile offshore from Mitchell Bay to Cattle Point, and a ½-mile off Lime Kiln Lighthouse.

2. DECEPTION PASS

Deception Pass is a geographically restricted area. Deception Pass is one of the most beautiful places in Puget Sound but must be transited with extreme caution as the currents can exceed 8 kts with large tide rips. Exempted yachts shall adhere to the following guidelines for Deception Pass, as a condition of their exemption: Transits of Deception Pass shall be inducted in daylight, in good visibility, and when the predicted current at Pass Island is less than 2 knots. Vessels transiting Deception Pass on a pilotage waiver shall transit South of Pass Island when transiting under the Deception Pass Bridge and North of Strawberry Island. Canoe Pass, North of Pass Island, is transited only by small vessels with local knowledge.

3. SWINOMISH CHANNEL

Swinomish Channel is a very narrow and shallow channel connecting Skagit Bay to Padilla



Bay. This channel should only be transited at HW, currents can be rather strong if docking in LA Conner, otherwise current is safe for passage.

4. ADMIRALTY INLET

Admiralty Inlet connects Puget Sound to the Strait of Juan de Fuca. Currents can exceed 4 kts, however present little danger for transiting in favorable weather. Vigilant monitoring of set and drift is required when transiting during strong current. During the summer months in

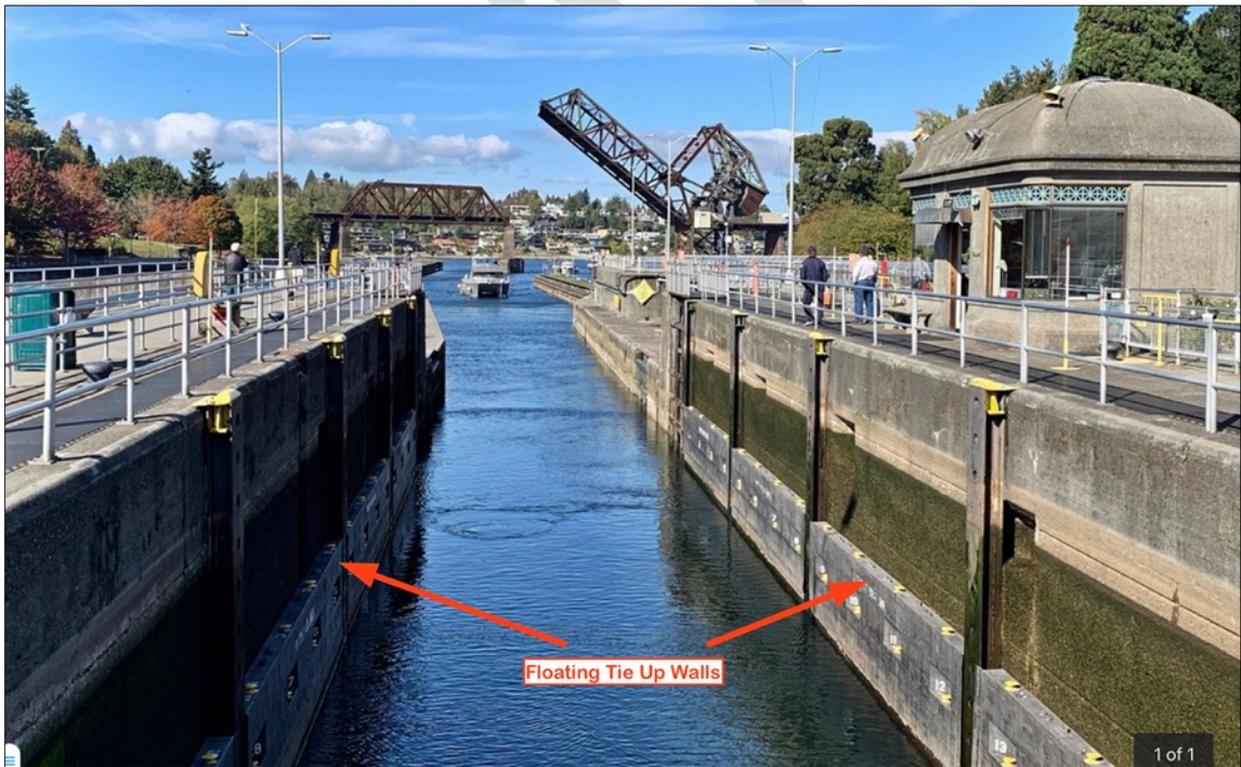
the afternoon, wind often increases quickly to gale or near gale conditions. When wind opposes current, steep, tall waves will build quickly.

5. BALLARD LOCKS, LAKE UNION and LAKE WASHINGTON SHIP CANAL

A Pilotage Exemption is required to transit the Ballard Locks. Vessels transiting the Ballard locks transit either the Large Lock or the Small Lock. The Ballard locks and Burlington Northern Railroad Bridge both monitor VHF 13, however, typically only answer commercial radio traffic calls.

The large locks have 2 chambers with a combined length of 760', width of 80', 29' deep depth. The small locks are 123' in length, width of 28', and depth of 16'. Both locks have a lift of approx. 26' depending on the tide height. The locks are open 24 hours a day year-round, and only close for maintenance and repair. Priority is given to emergency and commercial vessels.

Recreational yachts and all other vessels standby for instructions via a loud hailer from the lock wall or a red/green traffic light letting waiting vessels know it is safe to enter either the large or small lock. When standing by to enter the locks from seaward be mindful of the strong currents in the area and give way to commercial traffic and all vessels exiting the lock. When entering the locks, vessels will use their own lines to make fast to the lock wall. Lock handlers will pass a heaving line to the vessel to pass the lines if the vessel lines cannot be passed. Typically, one bow and one stern line are made fast when transiting the locks. If the bow and stern lines cannot be made fast at the same time the lock attendants will instruct the vessel to make fast the stern line first. In the large locks, vessel make fast to a fixed wall and lines, at least 50 feet in length, must be tended constantly, as opposed to the small locks where vessels make fast to a floating lock wall and lines are only adjusted as needed. It is advised to have fenders on both sides of the vessel, as often boats are rafted alongside in both the small and large locks. When the lock doors open, there is a significant amount of residual current. When the lock attendant informs the vessel, it is ok to exit the lock, the captain should wait until they are comfortable with the current. The current drastically reduces within a short time. Vessels drafting more than 14 feet transiting the large lock should contact the lock handlers to request the Saltwater Barrier be lowered. The maximum speed limit in the government locks is 4 kts. The speed limit from the locks to the entrance of Lake Washington at Webster Pt. is 7 knots. All bridges have hours of restrictions for opening. Seattle VTS ends coverage at the entrance to Shilshole Marina, therefore vessels should monitor VHF 13, and make security calls as necessary to ensure safe navigation. The Lakes and Ship Canal have a large amount of milfoil and may affect vessel cooling systems. Anchoring is not permitted in Lake Union except for specific Holiday Events as outlined in Local Notice to Mariners. Anchoring is permitted in Lake Washington for short periods of time in a few of the coves. Overnight anchorage is only permitted in Andrews Bay. There are two floating bridges that span the width of Lake Washington with fixed vertical clearance passages at both high-rise ends.





a. BRIDGE TRANSITS

There are 5 movable bridges and one fixed bridge between Shilshole Bay and the entrance to Lake Washington. Lake Washington Ship Canal Bridges will not open for vessels less than 1,000 gross tons on weekdays from 0700-0900 and 1600-1800, except for federal holidays, excluding Columbus Day. All movable bridges monitor VHF 13 for openings. Non-commercial vessels shall request openings by whistle signal until dusk (one prolonged, one short) Bridges open on request from 0700-2300, after hours is by appointment only with a minimum of 1-hour notice.

6. DUWAMISH RIVER WATERWAY

A Pilotage Exemption is required to transit the Duwamish River Waterway.

The Duwamish River extends from the West Waterway through the Spokane Street Bridge, and approximately 2 miles further to Delta Marine Shipyard. Both of these Bridges have restricted hours of opening. The Duwamish River has numerous ship and barge terminals. Caution should be taken when transiting to avoid commercial traffic.

Particular caution must be taken during the salmon gillnetting season in the late-summer and early fall. Numerous gillnets, up to 300 feet long, may severely restrict the channel.

Information about fishing season opening dates and regulations can be found at <https://nwifc.org/member-tribes/muckleshoot-tribe/> and USCG Local Notice to Mariners

Yachts bound for Delta Marine may also contact the shipyard for a recent report of fishing activity in the river.

VHF 13 MONITORING

All deep draft vessels, tug and tows, and other commercial vessels monitor the Vessel Traffic VHF Channel and VHF 13, **DEEP DRAFT VESSELS DO NOT MONITOR VHF 16**. Deep draft vessels make contact and passing arrangements on VHF 13, so will attempt to contact your vessel on VHF 13. **Monitor VHF 13 at all times.**

RULES OF THE ROAD AND DEEP DRAFT VESSELS

International Rules of the Road (72 COLREGS) apply to all waters of Puget Sound including Lake Union, Lake Washington and the Duwamish River. Deep draft vessels, tugs with tows, and commercial vessels primarily use the traffic lanes. As a vessel on pilotage waiver, it is best to transit near the outside edge of the traffic lanes. Deep draft vessel will prefer to overtake on your port side in deeper water.

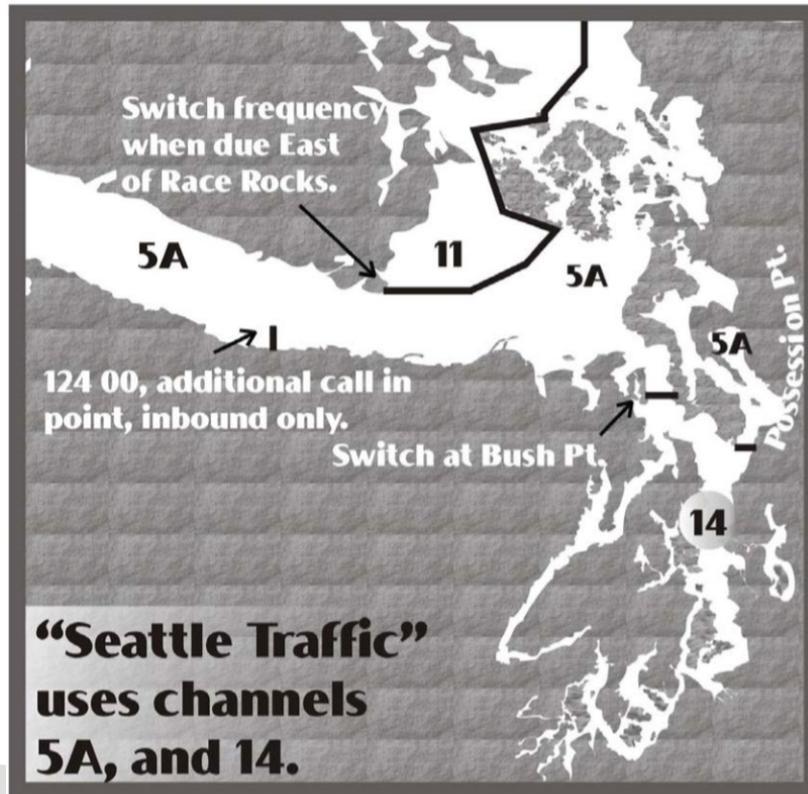
It is advisable to stay well clear of deep draft vessels maneuvering in Puget Sound and be mindful of their wake, which can be steep. Puget Sound Pilots make great effort in minimizing the vessel wakes, but due to the design of certain vessels caution should be observed. Additionally, staying well clear of deep draft vessels maneuvering is essential as these vessels have a limited amount of maneuvering room and ability.

RULE 10 Traffic Separation Schemes

- (a) This Rule applies to traffic separation schemes adopted by the Organization and does not relieve any vessel of her obligation under any other rule.
- (b) A vessel using a traffic separation scheme shall:
 - (i) proceed in the appropriate traffic lane in the general direction of traffic flow for that lane;
 - (ii) so far as practicable keep clear of a traffic separation line or separation zone;
 - (iii) normally join or leave a traffic lane at the termination of the lane, but when joining or leaving from either side shall do so at as small an angle to the general direction of traffic flow as practicable.
- (c) A vessel shall, so far as practicable, avoid crossing traffic lanes but if obliged to do so shall cross on a heading as nearly as practicable at right angles to the general direction of traffic flow.
- (d)
 - (i) A vessel shall not use an inshore traffic zone when she can safely use the appropriate traffic lane within the adjacent traffic separation scheme. However, vessels of less than 20 meters in length, sailing vessels and vessels engaged in fishing may use the inshore traffic zone.
 - (ii) Notwithstanding subparagraph (d)(i), a vessel may use an inshore traffic zone when en route to or from a port, offshore installation or structure, pilot station or any other place situated within the inshore traffic zone, or to avoid immediate danger.
- (e) A vessel other than a crossing vessel or a vessel joining or leaving a lane shall not normally enter a separation zone or cross a separation line except:
 - (i) in cases of emergency to avoid immediate danger;
 - (ii) to engage in fishing within a separation zone.
- (f) A vessel navigating in areas near the terminations of traffic separation schemes shall do so with particular caution.
- (g) A vessel shall so far as practicable avoid anchoring in a traffic separation scheme or in areas near its terminations.

- (h) A vessel not using a traffic separation scheme shall avoid it by as wide a margin as is practicable.
- (i) A vessel engaged in fishing shall not impede the passage of any vessel following a traffic lane. (j) A vessel of less than 20 meters in length or a sailing vessel shall not impede the safe passage of a power-driven vessel following a traffic lane

VTS QUICK SUMMARY: WORKING CHANNELS/AREAS/ COOPERATIVE VTS



VHF Radio Areas and Call-In Points.

VMRS (Vessel Movement Reporting System) Users:

- Every power-driven vessel of 40 meters (approximately 131 feet) or more in length, while navigating;
- Every commercial vessel engaged in towing 8 meters (approximately 26 feet) or more in length, while navigating;
- Every vessel certificated to carry 50 or more passengers for hire, when engaged in trade.

VTS (Vessel Traffic Service) Users:

- Every power-driven vessel of 20 meters (approximately 66 feet) or more in length, while navigating;
- Every vessel of 100 gross tons or more carrying 1 or more passengers for hire, while navigating;
- A dredge or floating plant.

Waterborne Craft:

- 1972 Collision Regulations definition of a vessel. Note: Vessel length is measured from end to end over the deck, excluding sheer.

Level of participation

ALL waterborne craft are subject to:

1. 1972 Collision Regulations (72 COLREGS);
2. VTS Measures (direction given by the VTS, 33CFR 161.11);
3. All other practices of safe navigation and prudent seamanship.

VTS Users (in addition to the above requirements):

4. Shall monitor the designated VHF-FM VTS frequency for the area in which they are operating, and Channel 13;
5. Shall respond if hailed;
6. Shall comply with general VTS operating rules.

VMRS Users (in addition to all of the above):

Shall make required reports to the VTS, see VTS User Manual.

U.S. CUSTOMS AND BORDER PROTECTION REPORTING

Pursuant to 19 CFR 4.2, any small vessel arriving to the United States from a foreign port or place to include any small vessel which has visited a hovering vessel or received merchandise outside the territorial sea, are required to report their arrival to CBP immediately (see 19 U.S.C. 1433). See www.cbp.gov/travel/pleasure-boats-flyers for more information.

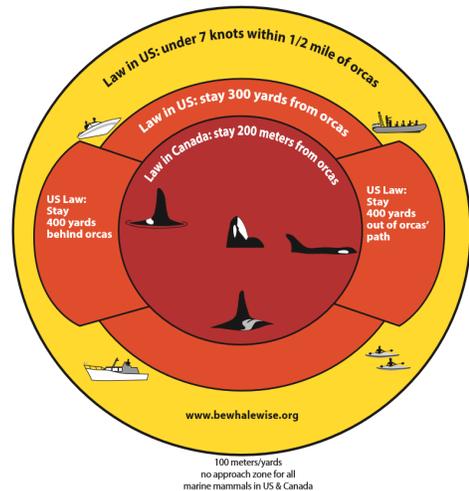
WHALE INFORMATION

Link to Whale Regulations, Recent Whale Sightings Map and Whale Watching Guidelines.

<https://wdfw.wa.gov/species-habitats/at-risk/species-recovery/orca>

<https://www.bewhalewise.org>

All vessels must stay 300 yards away from Southern Resident killer whales, 400 yards out of the path or behind the whales, and remain under 7 knots within a half mile of the whales.



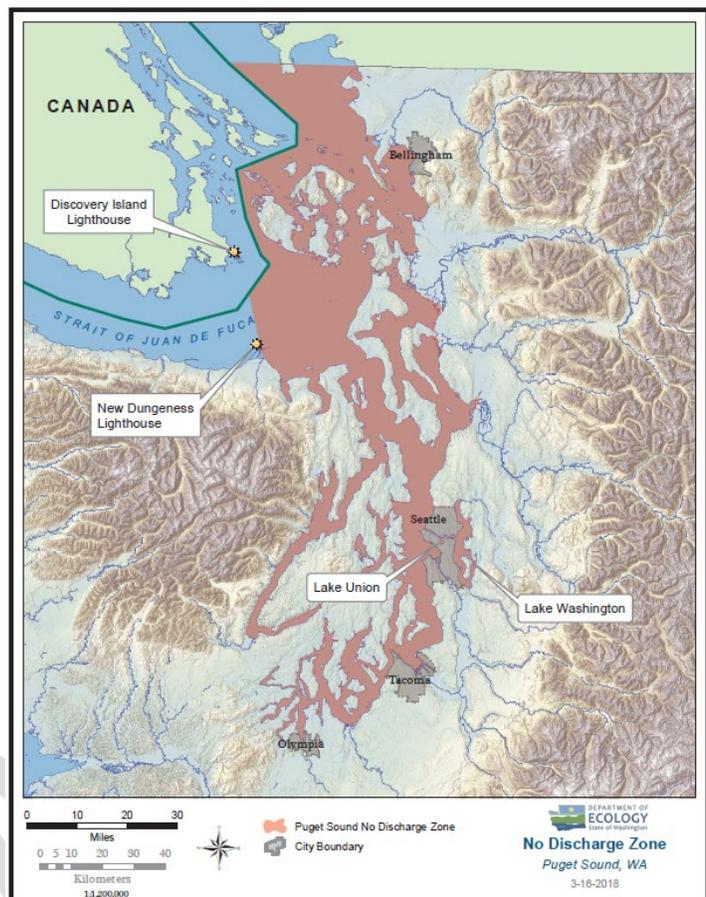
SPEED LIMIT NO WAKE ZONES

Puget Sound	Budd Inlet, Olympia	7-knot speed limit from Olympia Shoal to an East/West line at the North tip of Port of Olympia peninsula, where a 5-knot limit begins and extends south in both the east and west channels. No Wake speed limit in all City of Olympia waters
Puget Sound	Amsterdam Bay, Anderson Island	5-mph No Wake speed is requested to protect shoreline.
Puget Sound	Foss Waterway, Tacoma	A No Wake speed limit exists throughout the Thea Foss Waterway
Puget Sound	Commencement Bay Waterways	5-mph speed limit in the Hylebos, Blair, St. Paul, Milwaukee, Sitcum, and Middle waterways off of Commencement Bay
Puget Sound	Gig Harbor	5-mph No-Wake speed limit is enforced in Gig Harbor and 200 feet outside the entrance
Puget Sound	Salmon Bay, Ship Canal, and Lake Union	7-knot No Wake speed limit is enforced from Hiram M. Chittenden Locks to Webster Point
Puget Sound	WA Narrows between Sinclair Inlet and Dyes Inlet	A Minimum Wake speed is requested to protect shoreline and boats moored at the marina
Puget Sound	Liberty Bay, Poulsbo	5-knot speed limit on the north half of the bay; a marked buoy signals the south end of the speed limit zone.
Puget Sound	Keyport	Anon-shore sign at the Keyport Naval Research facility marks a No Wake speed limit zone in front of the Naval facility docks
Puget Sound	Eagle Harbor	5-knot speed limit begins at buoy
Puget Sound	Port Ludlow	5-mph No Wake speed limit is in effect throughout Port Ludlow and applies to all vessels, including dinghies
Swinomish Channel	La Conner	A No Wake zone extends from Hole-in-the-Wall on the south end to the railroad swing bridge on the north end
Puget Sound & San Juan Islands	Southern Resident Killer Whales	A 7-knot No Wake speed limit is required and enforced within one-half nautical mile of Southern Resident Killer Whales within inland Washington waters
San Juan Islands	Pole Pass	7-mph speed and low-wake zone marked by white cylindrical buoys extends 1/3 mile northwest of Pole Pass then eastward and southward to Bell Island; enforced by the County Sheriff
San Juan Islands	Mosquito Pass	7-mph speed and low-wake zone extends throughout Mosquito Pass; enforced by County Sheriff
San Juan Islands	Fisher Bay Channel	5-mph speed limit zone extends through the entrance channel

NO DISCHARGE ZONE

Puget Sound is a No Discharge Zone for vessel treated and untreated sewage. Even small amounts of sewage discharges over or near shellfish beds can cause enough pollution to require harvest closures. If your boat has a toilet on board, you are required to have a Type III marine sanitation device (MSD) or a holding tank. All of the inside waters of Washington State from Puget Sound to the Canadian Border are a No Discharge Zone (NDZ). It is illegal to discharge any (treated and untreated) black water sewage. Gray water from showers and sinks is not covered by this restriction.

More information can be found at <https://ecology.wa.gov/Water-Shorelines/Puget-Sound/No-discharge-zone>



AQUATIC INVASIVE SPECIES (AIS) PREVENTION PERMIT

Most boats operating in Washington state waters that do not have a Washington state registration sticker need to purchase and carry an AIS Prevention Permit. Dinghies are exempt. Permits can be purchased online at www.fishhunt.dfw.wa.gov/#/catalog/products on the "Other" tab, or at any Washington State Department of Fish and Wildlife license retailer. The permit is good for one year.

BALLAST WATER

The Washington Department of Fish and Wildlife (WDFW) is responsible for implementing state ballast water laws. These rules apply to vessels 300 gross tons or more and can be found here: <https://wdfw.wa.gov/species-habitats/invasive/ballast-water>

RESOURCES

Nautical Supply Stores:

- Captain's Nautical (online only at <https://www.captainsnautical.com/>)
- West Marine
- Fisheries Supply
- LFS Marine Supply
- Seattle Marine & Fishing Supply

Popular PNW Cruising Guides

- [Waggoner Cruising Guide](#)
- Exploring the Pacific Coast by Don & Reanne Douglass
- San Juan Islands: A Boater's Guidebook by Heather Bansmer & Shawn Breeding
- A Cruising Guide to Puget Sound and the San Juan Islands Olympia to Port Angeles By Scherer
- Exploring the San Juans by Don and Reanne Douglass
- Ports and Passes: PNW Tide and Current Guide

WEATHER

The USCG continuously transmits weather observations and forecasts on VHF channels WX1 to WX8. National weather service forecasts can be found at www.marine.weather.gov

LINKS TO WASHINGTON STATE AND BC FISHING REGULATIONS

- Washington State Fishing Information: <https://wdfw.wa.gov/fishing>
- British Columbia Fishing Information: <http://www.env.gov.bc.ca/fw/fish/>

OIL SPILL, GROUNDING OR EMERGENCY

1. Minimize Risk to People and the Environment
2. Contact Seattle Traffic by phone or VHF as well as USCG Contact Spill Recovery Agency
Report the spill immediately to BOTH:
 - Washington Emergency Management Division (800) 258-5990
 - National Response Center (800) 424-8802

CONTACTS

- Seattle Traffic (206) 217-6050
- Victoria Traffic (250) 363-6333
- Puget Sound Pilots 24hr Dispatch (206) 448-4455
- USCG Nation Response Center (800) 424-8802
- Seattle Harbor Police (206) 684-4071

TUG COMPANIES

- Crowley (206) 332-8201
- Foss (206) 281-3810
- Western Towboat (206) 789-9000
- Fremont Tugboat (206) 632-0151



STATE OF WASHINGTON
BOARD OF PILOTAGE COMMISSIONERS

2901 Third Avenue, Suite 500 | Seattle, Washington 98121 | (206) 515-3904 | www.pilotage.wa.gov

FREQUENTLY ASKED QUESTIONS (FAQs)
Concerning Pilotage Exemptions in Washington State

Do I need a pilot or a pilotage exemption in Washington State?

DO YOU:

- have a U.S. flagged vessel of any size – that is operating exclusively on its coastwise, fishery, and/or recreational endorsement?
- have a U.S. or Canadian flagged vessel engaged exclusively in the coastwise trade on the west coast of the Continental United States (including Alaska) and/or British Columbia?
- have a vessel in/outbound to/from Canadian ports which employs a pilot licensed by the Pacific Pilotage Authority (BC Pilots)?



If any of the above apply, stop. You do NOT need a pilot or a pilotage exemption

DO YOU:

- have a foreign flagged yacht over 200 FT and/or greater than 1,300 GT (ITC)?



If yes, you are required by the Pilotage Act, Chapter 88.16 RCW

to take a pilot. For information on how to schedule a pilot in Puget Sound, please contact Puget Sound Pilots dispatch at 206.448.4455. For information on scheduling a pilot in Grays Harbor, please contact the Port of Grays Harbor at <https://www.portofgraysharbor.com/terminal-tariffs-and-resources>.

DO YOU:

- have a foreign flagged yacht equal to or less than 200 FT and equal to or less than 1,300 GT (ITC)? or
- have a foreign flagged small passenger vessel that also meets the above size requirements, is manned by U.S. or Canadian-licensed deck and engine officers appropriate to the size of the vessel, and is operated exclusively in the waters of the Puget Sound Pilotage District or lower British Columbia?



If any apply, you may qualify for an exemption. To find the application form and additional resources, please visit our website at <https://pilotage.wa.gov/pilotage-exemptions.html>.

What are Washington State's pilotage districts?

As provided in the [Revised Code of Washington \(RCW\) Section 88.16.070](#), every vessel in the Puget Sound Pilotage District - all Washington (WA) waters east of 123° 24' W - or the Grays Harbor Pilotage District – the waters of Grays and Willapa Harbors - is subject to compulsory WA pilotage unless exempt. The WA waters of the Columbia River Bar and the Columbia River are subject to the pilotage laws and rules set by the State of Oregon

What is the process to receive a pilotage exemption?

In general, you will need to provide a completed application, which includes information regarding your vessel and planned transits in Washington's waters, copies of vessel insurance and registry, vessel captain license and experience, and a photo of the vessel. Additional requirements are found on the exemption application, which can be found on our [website](#).

Once all the documentation has been received and verified by BPC staff, the request for a pilotage exemption will be considered by the Board at the next available public meeting of the BPC. A schedule of BPC meetings can be found [here](#).

Are chartered yachts eligible for a pilotage exemption?

A foreign-flagged yacht that engages in trade (carrying cargo or passengers for a fee) is not considered a yacht for the purpose of determining eligibility for a Board-approved exemption.

A vessel that is under "bare boat" charter (or any form of charter in which the charterer has complete control of the vessel, e.g. by covering all costs of the vessel including master and crew at the charterer's expense) is considered a yacht for the purpose of determining eligibility for a Board-approved exemption if it is operated only for recreation/pleasure; does not engage in trade; and meets the tonnage and length requirements

How long does the pilotage exemption process take?

The Board of Pilotage Commissioners (BPC) recommends that you start the application process as soon as you know that you are coming into Washington waters, as exemptions are reviewed and granted at monthly meetings of the BPC, as referenced above. While an 'interim' exemption can be granted by the Chair of the BPC, the BPC **requests you apply at least one month in advance**. It can take several days to gather your documentation to submit a complete application. It is not unusual to see applications received in April or May for vessels coming in late summer.

What is the duration of the pilotage exemption?

There are two options: a three-month or a one-year pilotage exemption certificate. There is a small fee reduction for vessels that have an annual exemption renewal. However, a new application must be submitted each year.

What is the cost for an exemption?

The current fees, pursuant to [WAC 363-116-360](#), are listed below:

	3 Months or Less	1 Year or Less	Annual Renewal
A. YACHTS			
Up to and including 50 feet LOA	\$ 50	\$ 50	\$ 50
Up to and including 100 feet LOA	\$ 700	\$ 1,000	\$ 600
Up to and including 200 feet LOA and 750 gt	\$ 1,000	\$ 1,400	\$ 800
Up to and including 200 feet LOA and 751 to 1,300 gt	\$ 1,500	\$ 1,500	\$ 1,500
B. PASSENGER VESSELS			
Up to and including 100 feet LOA	\$ 1,125	\$ 1,500	\$ 1,000
Up to and including 200 feet LOA	\$ 1,500	\$ 1,500	\$ 1,200

How do I know which criteria in the application applies to my vessel?

Typically, vessel owners or captains will know if they are subject to the requirements. However, for example, an Asian Gypsy Moth Certificate is only given to vessels calling at certain ports in the Asian Pacific during certain times of year.

What is a COFR?

The COFR is an acronym for a Certificate of Financial Responsibility and is issued by the United States Coast Guard (USCG.) According to the USCG, you must have a COFR if the vessel is over 300 GT using the navigable waters of the United States. Find more information, including how to apply at <https://www.uscg.mil/Mariners/National-Pollution-Funds-Center/cofrs/>.

What are my options if my pilotage exemption request is not granted by the BPC?

If the Board does not grant you an exemption, you will be required to take a pilot. For information on how to schedule a pilot in Puget Sound, please contact dispatch at 206.448.4455. For information on scheduling a pilot in Grays Harbor, please view their information at <https://www.portofgraysharbor.com/terminal-tariffs-and-resources>

My vessel is under 65'. Why am I not exempt from pilotage automatically?

While many boaters may hear that a small vessel is exempt from pilotage, the Pilotage Act, [Chapter 88.16.070](#) is very clear that any size foreign flagged vessel is subject to compulsory pilotage.

What if I already have experience in the waters I plan to transit?

Under the authority granted in [WAC 363-116-360](#), the BPC may place conditions on your pilotage exemption, typically determined by previous local experience. One example is an "Pilot Orientation". A Pilot Orientation could be as extensive as a one-time cruise or could be as simple as meeting with a pilot to go through specific local landmarks and areas. Our new application packet has more information.

What is a "Pilot Orientation"?

Add definition

What happens if I do not comply with the pilotage exemption rules?

Under the authority granted to the BPC through [RCW 88.16.150](#), a person in violation of the Pilotage Act may be liable to a maximum civil penalty of ten thousand dollars for each violation. Non-exempt vessels failing to utilize compulsory pilotage service in either the Puget Sound or Grays Harbor Pilotage Districts as required in [RCW 88.16.070\(3\)](#) shall also pay all applicable pilotage charges.

Additional Resources

Coast Guard Navigation and Vessel Inspection Circular(NVIC) 8-94:
<http://www.uscg.mil/hq/cg5/nvic/pdf/1994/n8-94.pdf>. Vessels exempt from WA pilotage may be required to have or take a federal pilot as provided in the U.S. (federal) laws and regulations.

District 13 Local Notice to Mariners

<https://www.navcen.uscg.gov/?pageName=InmDistrict®ion=13>

Pilotage Act, Revised Code of Washington Chapter [88.16.070 RCW Vessels exempted and included under chapter—Fee—Penalty.](#)

Pilotage Rules: Washington Administrative Code [WAC 363-116-360 Exempt Vessels.](#)

Puget Sound Pilots: <https://www.pspilots.org/>.

Port of Grays Harbor: <https://www.portofgraysharbor.com/>.

Seattle Marine Traffic:

<https://www.marinetraffic.com/en/ais/details/ports/194?name=SEATTLE&country=USA>.

USCG Vessel Traffic Service – Puget Sound: <https://www.pacificarea.uscg.mil/VTSPugetSound/>.
Foreign Flag Familiarization Packet

DRAFT

(VEC) Vessel Exemption Committee

Per the VEC Charter adopted at the 8/17/2021 BPC meeting and amended at the 9/28/2021 BPC meeting, the VEC shall consist of: one (1) Chair representing the BPC, one (1) to three (3) members of the BPC, one (1) Puget Sound Pilot representative, one (1) large yacht/recreational boating representative, one (1) large recreational vessel (130-200 FT) captain, and one (1) small recreational boating representative.

Chair	Mike Anthony, BPC
BPC Representative(s)	Nhi Irwin Mike Ross Tim Farrell
Puget Sound Pilots Representative	Travis McGrath
Large Yacht/Recreational Boating Representative	Monique Webber, PYM
Large Recreational Vessel (130-200 FT) Captain	Charlie Johnson
* Small Recreational Boating Representative * Alternate	Leonard Landon, Waggoner Lorena Landon, Waggoner
BPC Support	Jolene Hamel

*** Requires Board Action**

Bio for Lorena Landon and Leonard Landon

Lorena and Leonard Landon have been boating Pacific Northwest waters for 35+ years and have logged over 35,000 miles on West Coast waters from Manzanillo, Mexico to Yakutat, Alaska with their 46-foot DeFever. As Managing Editors of the Waggoner Cruising Guide, they regularly cruise the waters of Southeast Alaska, West Coast Vancouver Island, Northern B.C., and Haida Gwaii in addition to their home waters of Washington State. They publish articles, provide presentations, work on marina consulting projects, and are co-hosts for Waggoner webcasts. Leonard's nautical skills are complemented by his aircraft pilot experience. In previous years, Leonard operated his own technology business for 16 years in the field of Information Technology Services. Lorena previously authored *Cleats & Eats*, a series of restaurant guidebooks for boaters. Lorena also served on the Boating Programs Advisory Committee for the State of Washington's RCO (Recreation and Conservation Office) for eight years. As a committee member, she helped evaluate and score marina projects requesting State grant monies for improvements that benefit boaters.



STATE OF WASHINGTON
BOARD OF PILOTAGE COMMISSIONERS

2901 Third Avenue, Suite 500 | Seattle, Washington 98121 | (206) 515-3904 | www.pilotage.wa.gov

Meeting Minutes – Vessel Exemption Committee (VEC)

February 09, 2022, 0900 to 1100

Present: Captain Mike Anthony (PSP, BPC Commissioner, VEC Chair), Captain Travis McGrath (PSP), Nhi Irwin (Ecology BPC Commissioner), Timothy Farrell (BPC Commissioner), Monique Webber (Pacific Yacht Management), Sheri Tonn, (BPC Chair), Jolene Hamel (BPC Staff), and Jaimie Bever (BPC Staff)

Absent: Captain Mike Ross (BPC Commissioner), Captain Charlie Johnson (Large Vessel Operator)

1. Review of 12/15/2021 Meeting Minutes

There were no recommendations for changes. The minutes were approved for distribution at the February Board meeting.

2. Updates Since Last Meeting

Chair Anthony opened the meeting by apologizing about the short notice on the written documents, as work was happening on the documents continuously up to when they were sent out. He reported that the 3 Captains –Anthony, McGrath and Johnson, have met separately and shared consensus on the goals document as was presented. BPC Chair Sheri Tonn, who has not previously attended VEC meetings due to quorum issues, was attending in Commissioner Ross’s absence. She thanked Chair Anthony and the other captains for their work but also questioned how the outside community would view it. She added that it was great as an internal document but might not yet be what the committee should use as public justification. Chair Anthony asked what the audience for this document was and if it was something that the BPC would be publishing beyond Board meeting material. Both Chair Tonn and Executive Director Bever reminded him that the committee will need to have something for the public to place on the website. ED Bever opened the website and walked the committee through the documents currently housed on the vessel exemption tab. Both of them would like to see the current goals document revamped to address the public, made more user-friendly and used to replace the current document that former BPC Chair Harry Dudley authored years ago. BPC Chair Tonn, Monique, and Commissioner Irwin all had issue with the use of the word “fair” and suggested the word “equitable” instead. Captain McGrath urged the importance of treating all vessels equitably, with the emphasis that equitable does not mean equal. The difference in risk of a 30’ vessel compared to a 175’ vessel is significant. Monique suggested that goals and actions at the Board level need to reflect each other. Commissioner Irwin inquired about FAQs for educational and outreach purposes. ED Bever thought FAQ’s were a great idea and in line with other BPC programs and projects.

3. License Level vs Vessel Size Issue Follow Up

At the last meeting, Captain McGrath volunteered to research this topic further and find out how other districts have resolved the issue. He reported that he contacted several other districts and found that either this issue has not come up or had not been identified as an issue. Chair Anthony stated that, historically, the BPC has relied on insurance documents but this needs further research at the commission and insurance level. It is within the Boards authority to deny an exemption if the license level does not match the size of the vessel. Monique stated that this appears to be a rare occurrence and can only recall one vessel, that had this issue. ED Bever asked if the committee wanted to have this be something the Board look's at on a case-by-case basis or through a blanket policy. Chair Anthony felt, since it was so infrequent, that perhaps it should remain on a case-by-case basis. BPC Chair Tonn asked if perhaps a conversation with insurance agents would be warranted to inquire how they insure and what documents they are looking at insuring a vessel. Some discussion of insurance and the documents vessels are required to report on ensued. However, there seems to be no minimum standards for a vessel under 300 GT.

4. Continued Work on Previously Established Goals

- #8 Fee Structure Update – The VEC discussed the current fee structure along with the statutorily prescribed penalties. Captain McGrath asked if those had ever been assessed to a vessel, and the short answer was no, as it would be a heavy lift in time and costs. The way it is currently structured would require the county prosecutor to take the case. ED Bever suggested that legislation to adjust the current fee structure could alleviate the need for a legal process. This would require legislative action to increase the fee ceiling from \$1,500 to create a category for interim and last-minute exemptions with a fee that is representative of the time it takes to process, as well as creating a built-in penalty for late application. Commissioner Irwin suggested that the VEC could explore a notice of violation. Monique added that there are ballast water reporting requirements templates that may be quickly adapted to our needs.
- Liability – Throughout the meeting there were several questions surrounding the liability risk to the BPC if it follows certain courses of action that the committee may recommend. ED Bever responded that she will relay the concerns to BPC legal counsel and bring back his recommendations. It was also thought that inviting him to our next meeting so he can hear firsthand the concerns of the committee might be beneficial.
- #15 Confidentiality of Exemption Applications update – BPC legal counsel, Albert Wang, has advised that pilotage exemption applications are documents that would need to be considered public records, although some identifying information could be redacted if such a request were ever received. Commissioner Irwin advised that the BPC should add a notice of Freedom of Information (FOIA) onto the application.
- Timing of Rollout – The committee discussed the timing of finalizing drafts and of Board approval for changes for the 2022 yacht season. Monique stated that she has 7 committed vessels and is talking with 35 others for possible travel to Washington waters in 2022. She feels strongly that she can use the work of the committee to get free publicity during the yacht news cycle – talk about all the ways that Washington has made things easier for boaters: more concise application\180 day stay, etc. Both she and Commissioner Irwin stressed that the VEC seemed to be 90-95% complete with some great updates and that they are really looking forward to some drafts to review for the March VEC meeting. Chair Tonn was really happy with the conversation and the direction that the committee is going, knowing that there is significant work to make Legislative changes but that the committee is laying the groundwork. ED Bever reminded the committee that the VEC work will be the stakeholder documentation for the legislative process. Chair Tonn advised that the committee might look at engaging other state agencies that are in touch with foreign flagged vessels such as DOL or DOR in order to get info regarding pilotage exemptions on

their websites. Monique offered some contacts with DOR who work on trip permit files.

5. Wrap-up/Next Steps/Next Meeting

The following tasks were assigned:

- Chair Anthony/Captain McGrath – Continue work on familiarization packet with the goal to get it to legal counsel before the next meeting.
- BPC Staff – Restructure goal document into a public outreach document to be used on website, create FAQ's, and revise exemption application to reflect changes discussed.
- ED Bever - Follow up questions to legal counsel for his opinion on liability and attendance at the next VEC meeting.

and the VEC will target the week of 2/28 for the next meeting. Jolene will send a doodle poll.

The meeting was adjourned at 11:00 am.



PROPOSED RULE MAKING

CR-102 (December 2017) (Implements RCW 34.05.320)

Do **NOT** use for expedited rule making

Agency: Board of Pilotage Commissioners

- Original Notice**
 Supplemental Notice to WSR _____
 Continuance of WSR _____

- Preproposal Statement of Inquiry was filed as WSR** 22-06-007 ; or
 Expedited Rule Making--Proposed notice was filed as WSR _____; or
 Proposal is exempt under RCW 34.05.310(4) or 34.05.330(1); or
 Proposal is exempt under RCW _____.

Title of rule and other identifying information: (describe subject) WAC 363-116-081 Rest Period

Hearing location(s):

Date:	Time:	Location: (be specific)	Comment:
May 19, 2022	10:00am	MS Teams	Contact BPC to request video link

Date of intended adoption: May 19, 2022 (Note: This is **NOT** the **effective** date)

Submit written comments to:

Name: Jaimie C. Bever, Executive Director
 Address: 2901 3rd Avenue, Suite 500, Seattle, WA 98121
 Email: BeverJ@wsdot.wa.gov
 Fax: (206) 515-3906
 Other:
 By (date) May 12, 2022

Assistance for persons with disabilities:

Contact Jolene Hamel
 Phone: (206) 515-3904
 Fax:
 TTY:
 Email: HamelJ@wsdot.wa.go
 Other:
 By (date) May 12, 2022

Purpose of the proposal and its anticipated effects, including any changes in existing rules: This rulemaking will amend the types of pilotage assignments subject to the requirement for ten hours rest with the opportunity for eight hours of sleep after completion of an assignment. Puget Sound Pilots (PSP) recently implemented several measures to increase dispatching efficiency and pilot availability while observing State mandated rest rules. One of those measures is to allow a pilot to be dispatched to multiple assignments as long as the combined duration of the assignments does not exceed thirteen hours. This rulemaking initiative is to consider and codify that change.

Reasons supporting proposal: Currently, there is a pilot shortage in both the Puget Sound and Grays Harbor Pilotage Districts. Puget Sound Pilots recently implemented efficiency measures, which they believe will result in enhanced pilot availability, improved on-watch productivity, reduced need for "call-back" pilots, and adherence to expert recommended work/rest best practices.

Statutory authority for adoption: Chapter 88.16 RCW, Pilotage Act

Statute being implemented: Chapter 88.16 RCW, Pilotage Act

Is rule necessary because of a:

- Federal Law? Yes No
Federal Court Decision? Yes No
State Court Decision? Yes No

If yes, CITATION:

Agency comments or recommendations, if any, as to statutory language, implementation, enforcement, and fiscal matters: Discussions regarding proposed amendments to this rule will occur at regular session BPC meetings as well as the BPC's Pilot Safety Committee (PSC) meetings, with the initial language recommendation coming from the PSC. Public comments are welcome and encouraged. Upon review and consideration of recommended revisions, a public hearing will be scheduled pursuant to formal notice requirements

Name of proponent: (person or organization) Board of Pilotage Commissioners Private
 Public
 Governmental

Name of agency personnel responsible for:

	Name	Office Location	Phone
Drafting:	Board of Pilotage Comm.	2901 3 rd Avenue, Seattle, WA 98121	(206) 515-3904
Implementation:	Board of Pilotage Comm.	2901 3 rd Avenue, Seattle, WA 98121	(206) 515-3904
Enforcement:	Board of Pilotage Comm.	2901 3 rd Avenue, Seattle, WA 98121	(206) 515-3904

Is a school district fiscal impact statement required under RCW 28A.305.135? Yes No

If yes, insert statement here:

The public may obtain a copy of the school district fiscal impact statement by contacting:

Name:

Address:

Phone:

Fax:

TTY:

Email:

Other:

Is a cost-benefit analysis required under RCW 34.05.328?

Yes: A preliminary cost-benefit analysis may be obtained by contacting:

Name:

Address:

Phone:

Fax:

TTY:

Email:

Other:

No: Please explain: RCW 34.05.328 does not apply to the adoption of these rules. The Board of Pilotage Commissioners is not a listed agency in RCW 34.05.328(5)(a)(i)

Regulatory Fairness Act Cost Considerations for a Small Business Economic Impact Statement:

This rule proposal, or portions of the proposal, **may be exempt** from requirements of the Regulatory Fairness Act (see chapter 19.85 RCW). Please check the box for any applicable exemption(s):

This rule proposal, or portions of the proposal, is exempt under RCW 19.85.061 because this rule making is being adopted solely to conform and/or comply with federal statute or regulations. Please cite the specific federal statute or regulation this rule is being adopted to conform or comply with, and describe the consequences to the state if the rule is not adopted.

Citation and description:

This rule proposal, or portions of the proposal, is exempt because the agency has completed the pilot rule process defined by RCW 34.05.313 before filing the notice of this proposed rule.

This rule proposal, or portions of the proposal, is exempt under the provisions of RCW 15.65.570(2) because it was adopted by a referendum.

This rule proposal, or portions of the proposal, is exempt under RCW 19.85.025(3). Check all that apply:

RCW 34.05.310 (4)(b)
(Internal government operations)

RCW 34.05.310 (4)(e)
(Dictated by statute)

RCW 34.05.310 (4)(c)
(Incorporation by reference)

RCW 34.05.310 (4)(f)
(Set or adjust fees)

RCW 34.05.310 (4)(d)
(Correct or clarify language)

RCW 34.05.310 (4)(g)
((i) Relating to agency hearings; or (ii) process requirements for applying to an agency for a license or permit)

This rule proposal, or portions of the proposal, is exempt under RCW ____.

Explanation of exemptions, if necessary:

COMPLETE THIS SECTION ONLY IF NO EXEMPTION APPLIES

If the proposed rule is **not exempt**, does it impose more-than-minor costs (as defined by RCW 19.85.020(2)) on businesses?

No Briefly summarize the agency's analysis showing how costs were calculated. _____

Yes Calculations show the rule proposal likely imposes more-than-minor cost to businesses, and a small business economic impact statement is required. Insert statement here:

The public may obtain a copy of the small business economic impact statement or the detailed cost calculations by contacting:

Name:
Address:
Phone:
Fax:
TTY:
Email:
Other:

Date: TBD	Signature: Place signature here
Name: Jaimie C. Bever	
Title: Executive Director	

WAC 363-116-081 Rest period. (1) Pilots shall observe

rest period requirements as set out in RCW 88.16.103 as now or hereafter amended. Pilots shall have a mandatory rest period of at least ten hours with an opportunity for eight hours of uninterrupted sleep after completion of an assignment or multiple assignments; excluding multiple assignments within a harbor area, provided the combined total duration of assignment time does not exceed thirteen hours.

(2) An assignment is a billable pilotage service, including cancellations and ship movements, regardless of duration

(3) An assignment begins at call time and ends at check-in time and includes preparation time and travel time to and from the ship in addition to bridge time. Call time allows one to two hours of preparation before the start of travel time to the ship. Check-in time occurs when travel time from the ship is completed. In the Puget Sound Pilotage district travel times are documented in the Puget Sound pilots operating rules and may be reviewed by the board from time to time.

(4) When there are multiple assignments, the combined total duration of the assignments shall not exceed thirteen hours. The

total duration of multiple assignments shall be measured from the call time before the first assignment to check-in time after the final assignment. ~~within a harbor area (multiple harbor shifts), call time is before the first harbor shift and check-in time occurs when the travel time has been completed after the final harbor shift. Harbor area geographic definitions outlined by the utilities and transportation commission are used to distinguish harbor shifts from other ship moves.~~

(5) ~~Pilots shall not complete more than three consecutive night assignments, a night assignment being one in which~~ An assignment is a night assignment if any part occurs between 0100 and 0459 hours. After three consecutive nights with night assignments, pilots shall have a mandatory rest period of at least twelve hours, including at least one period between 2000 and 0800 hours.

[Statutory Authority: Chapter 88.16 RCW. WSR 21-07-088, § 363-116-081, filed 3/19/21, effective 4/19/21. WSR 97-08-042, recodified as § 363-116-081, filed 3/28/97, effective 3/28/97. Statutory Authority: RCW 88.16.035. WSR 79-05-023 (Order 79-2, Resolution No. 79-2), § 296-116-081, filed 4/17/79; Order 73-6, § 296-116-081, filed 5/11/73.]