



## STATE OF WASHINGTON BOARD OF PILOTAGE COMMISSIONERS

*BPC Mission: to ensure against the loss of lives, loss of or damage to property and vessels, and to protect the marine environment by maintaining efficient and competent pilotage service on our State's inland waters.*



## THE BPC PILOTAGE QUARTERLY

Summer 2022



### Announcements

#### **Licensures**

Congratulations to Captains  
Peter Mann & Eric Michael,



who received state licenses  
to pilot in the Puget Sound  
Pilotage District during the  
2<sup>nd</sup> quarter of 2022!

#### **Record Breaking Cruise Season**

Cruise Season has not only  
returned but has also  
broken a record with 296  
scheduled arrivals, or 592  
pilotage assignments,  
extending into late October  
2022!

#### **Meeting Schedule**

The next public BPC meeting  
is Thursday August 16. We  
hope you can join us!

Visit our [website](#) for more  
information regarding  
meeting agendas, materials,  
and minutes.

## Pilot Ladder Safety

Pilots all over the world frequently encounter pilot ladders not in compliance with safety standards. Noncompliant ladders have caused serious injury and death.

Puget Sound Pilots and the Port of Grays Harbor are now utilizing a system to report pilot ladder noncompliance to both the U.S. Coast Guard and the BPC. The BPC's Pilot Safety Committee (PSC) reviews the submissions, determines any actions, and reports to the BPC at regular monthly meetings.

The Board issued [Safety Advisory Bulletin 21-01](#) on November 18, 2021 regarding pilot transfer arrangements. In addition, and more recently, the Board issued [Safety Advisory Bulletin 22-01](#) on May 19, 2022 regarding retrieval lines.

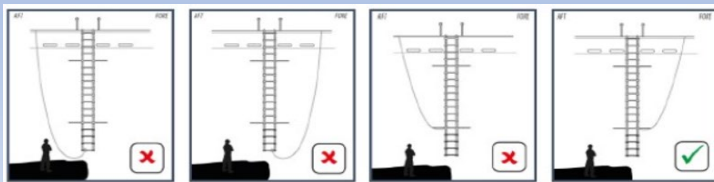
Improperly rigged ladder retrieval lines are dangerous situations for pilots. When retrieval lines are rigged below the lower spreader and/or leading aft, it can lead to the situation below.



Retrieval lines  
must be rigged  
at or above the  
lower spreader  
and must lead  
forward so that

Video available at <https://www.ptholland.com/maritime-training-serious-injury-to-pilot/>

the line does not risk  
becoming entangled  
with the pilot boat as  
it approaches from aft.



It is imperative for the  
safety of all pilots that information regarding unsafe ladders is documented by each  
pilot and communicated to other pilotage districts as needed, and that corrections  
to pilot transfer arrangements are top priority. Please be aware that Washington  
state pilots may refuse to board a ship with a non-compliant ladder.

Puget Sound Pilots is leading the way toward pilot ladder safety. We thank them,  
and Captains Sandy Bendixen and Scott Anacker in particular, for their efforts!

# Exemptions from Pilotage



Are you cruising in Washington state this summer? Be sure to check out our regulations on mandatory pilotage!

If your recreational vessel is registered outside of the United States or Canada, you are subject to mandatory pilotage no matter the size of your vessel.

If your vessel is less than 1,300 GT(International) and 200 FT length overall, you may be eligible for a pilotage exemption from the BPC!

Find information including FAQ's, Pilotage Exemption Petition, and Foreign Yacht Familiarization Packet on our website at [www.pilotage.wa.gov/pilotage-exemptions.html](http://www.pilotage.wa.gov/pilotage-exemptions.html) or scan the code!



## ERTV and Tug Escort Analyses

The 2019 Washington State Legislature directed the Department of Ecology to develop a model to assess the risk of oil spills from vessels in Washington waters and use this model to perform two analysis projects:

- Ecology - Assess whether an emergency response towing vessel (ERTV) serving Haro Strait, Boundary Pass, Rosario Strait, and connected navigable waterways will reduce oil spill risk ([RCW 88.46.250](#))
- BPC and Ecology – Tug escorts for certain types of tank vessels carrying oil in Puget Sound ([RCW 88.16.260](#))

In preparation for the analysis work, Ecology held webinars on June 6 and July 13 to introduce the two analysis projects. Recordings of and information regarding those webinars can be found on Ecology's [Risk Modeling website](#).

For more information regarding the BPC and Ecology's partnership on the deliverables outlined in [ESHB 1578](#), visit the [Oil Transportation Safety](#) page of our website.



<https://ecology.wa.gov/Spills-Cleanup/Spills/Oil-spill-prevention/Safety-of-Oil-Transportation-Act/Risk-modeling>

## District Snapshots

### Puget Sound



#### Retirements:

Captain Steve Moreno  
*Thank you for your service!*

#### License Upgrades to Unlimited:

Captain Chris Rounds  
*Well done!*

#### Training Program:

Currently training are Captains Ekemann, Bostick, Holland, Riddle, Cassee, Scott, Kelly, and Mancini.



Pilot trainee Larry Holland trains on a vessel out of Terminal 105 in Seattle.  
Image courtesy of Puget Sound Pilots.

### Grays Harbor

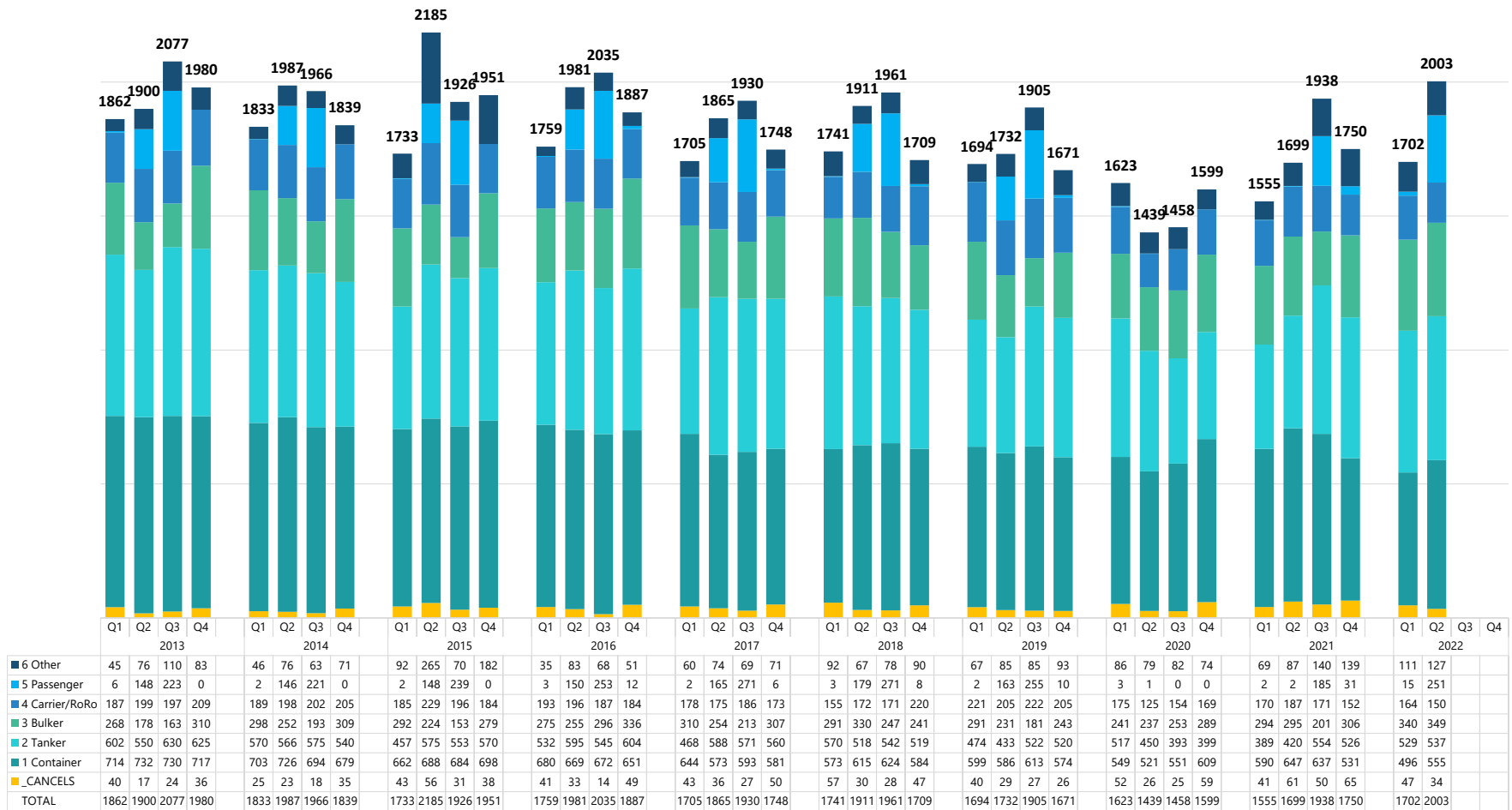


#### Training Program:

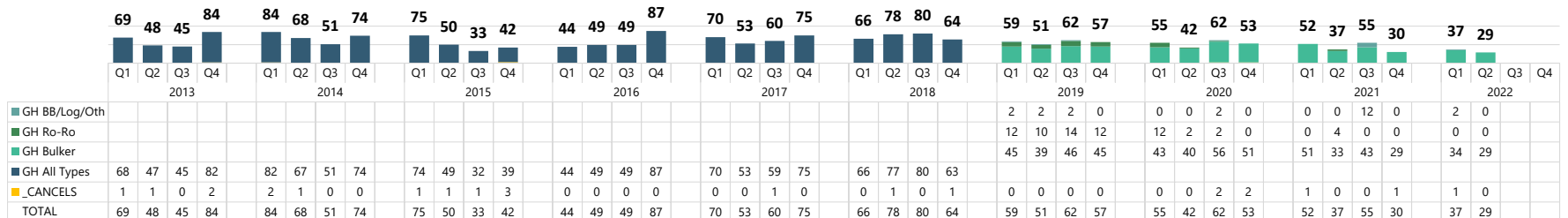
Currently training are Captains Leo and Grobschmit.



**Puget Sound Pilotage District Assignments 2013-2022**  
quarterly, by vessel type, including cancellations



**Grays Harbor Pilotage District Assignments 2013-2022**  
quarterly, by vessel type when available, including cancellations



August 15, 2022  
Q1 PSP assignment counts now corrected.  
Previously counted 47 cancellations twice.

# Puget Sound District Activity Report Dashboard

Licensed Pilots  
Including President

52

PS District  
Trainees

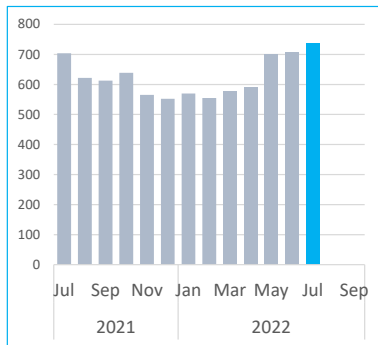
7

*New pilot licensed at July mtg not counted (will start in Aug)  
One pilot retired as of July. So, pilot count is down by 1.*

July 2022

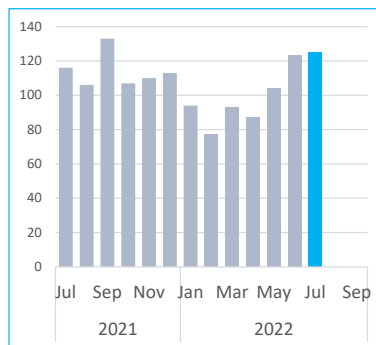
Total Assignments

737



Repositions

125

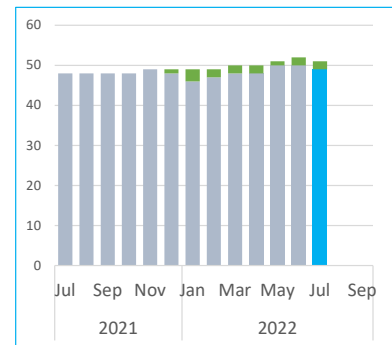


Licensed Pilots not incl Pres 51

Pilots NFFD entire month

2

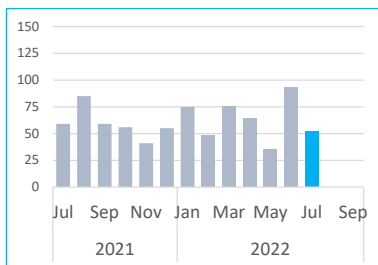
Available Pilots 49



Comp Days Used

(Licensed Pilots)

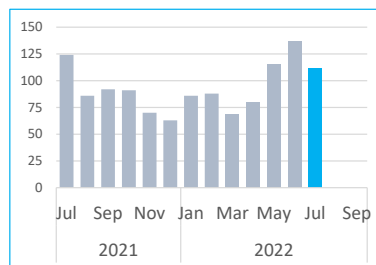
52



Comp Days Earned

(Callbacks)

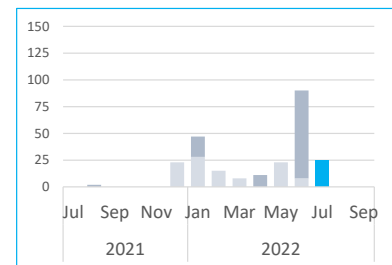
112



New metric: NFFD and COVID Days

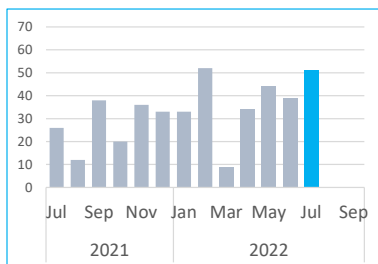
Covid Days 25

NFFD Days\* 0



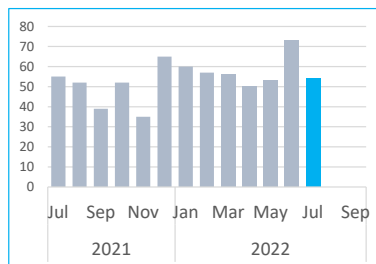
Delays due to  
Unavailable Rested Pilot

51



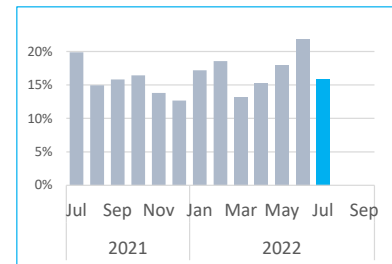
Billable Delays  
by Customers

54



Off-Watch Assignments  
(Callbacks)

16%



\* NFFD Days counts unavailable pilot days due to NFFD and COVID for pilots who were not NFFD the entire month (they were available part of the month).



July 2022

## June's TEU Tallies: What the Ports Report So Far

Not all of the ports we routinely monitor have revealed their container traffic numbers for June by the time this newsletter goes to print. Indeed, we do not expect to see the June figures for the Port of New York/New Jersey (PNYNJ) until mid-August. But here are the port TEU tallies we have so far.

It was a mixed June at the two big ports in Southern California. Yes, when loaded as well as empty boxes are counted, both the **Port of Los Angeles** and the **Port of Long Beach** set new records for the month of June with 876,611 total TEUs at LA and 835,412 total TEUs at Long Beach. Yet, inbound loads (444,680 TEUs) at the Port of Los Angeles were down by 11.1% from May and by 4.9% from June 2021. Next door at the Port of Long Beach, inbound loads (415,677 TEUs) were also down from May (by 4.9%) but were up 16.4% over June 2021. As a unitary maritime gateway, the two San Pedro Bay ports handled 860,357 loaded inbound TEUs in June, down by 8.2% from May but nonetheless up by 4.3% from a year earlier.

Neither port had positive export numbers for containers bearing merchandise. Outbound loads at the Port of LA (93,890 TEUs) were down 2.3% from last June. At the Port of Long Beach, the 115,303 outbound loaded TEUs were

down 1.4% year-over-year. The two ports did, however, post a combined 13.8% jump from last June in the number of outbound empties (624,242 TEUs). But even that total was down by 6.2% from May.

Total volumes (loads + empties) through the two ports in June came to 1,712,023 TEUs, a 7.0% bump over June of last year.

YTD, the two ports moved 10,421,681 TEUs, up 2.4% from a year ago. But that gain came despite a slight (-13,973 TEUs) fall-off in container traffic through the Port of LA.

Meanwhile up at the **Port of Oakland**, inbound loads (95,530 TEUs) slipped by 3.3% from May but edged up by 0.5% from last June. Outbound loads, on the other hand, were off by 4.2% to 68,227 TEUs from a year earlier. June saw the San Francisco Bay port handle a total of 215,953 laden and empty TEUs in June, down 2.9% from year earlier.

Reduced vessel calls in June dented the volume of containerized trade at the **Northwest Seaport Alliance Ports of Tacoma and Seattle**. Import loads (113,295 TEUs) were down from both May (-6.1%) and from June of last year (-15.4%). Export loads (51,964 TEUs) did jump by 14.1% from a month earlier but were off 8.8% from June 2021. On a year-to-date basis, export loads through June (698,296 TEUs) were down 6.9% from last year, while export loads (281,920 TEUs) plunged by 24.2%. A 20.4% bump in empty exports helped cushion the overall decline in box trade through the ports such that total international container traffic YTD through the two Washington State seaports (1,436,381 TEUs) was down by 5.2% from a year earlier.

Across the border, the **Port of Vancouver** posted an 11.2% increase in inbound loads (167,982 TEUs) over the previous June. However, outbound loads (54,951 TEUs) were down 28.2% from a year earlier. As was the case south of the border, Vancouver enjoyed a robust year-over-

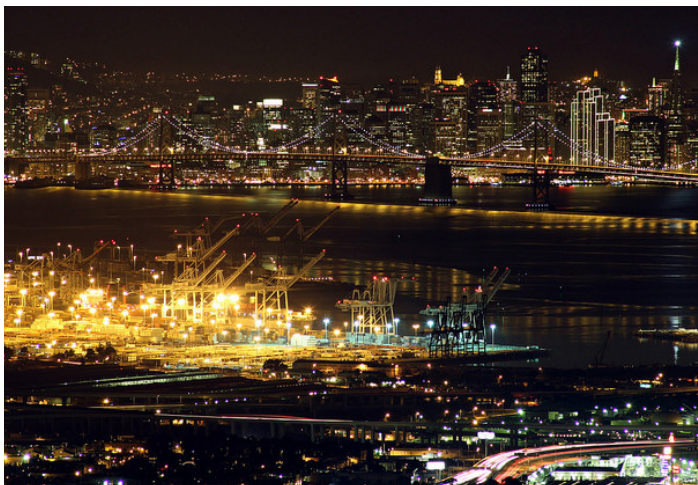


Photo courtesy of Port of Oakland





## June's TEU Tallies *Continued*

year jump (+30.7%) in empty outbound TEUs. Still, total container traffic through the British Columbia port in this year's first-half (1,803,477 TEUs) was down 7.2% from last year.

Along the Gulf of Mexico, inbound loads (157,778 TEUs) at the **Port of Houston** were down 0.6% from May but up 13.1% from last June, while outbound loads (102,889 TEUs) soared by 21.6% from a year earlier. Total container traffic through the Texas port in June grew year-over-year by 10.7% to 323,823 TEUs.

Along the Eastern Seaboard, the **Port of Virginia** saw its inbound load volume grow by 9.9% to 152,496 TEUs over last June but slide by 8.6% from May. Outbound loads (86,138 TEUs) were up by 9.2% year-over-year. Total container traffic through the port in June amounted to 317,742 TEUs, a 12.9% gain over a year earlier.

### Number of the Month

Puget Sound Pilots Seek  
**35.85%**  
Rate Increase

Despite Record Individual Pilot Earnings of  
\$68K Per Month in May and June

## For the Record: The Complete May TEU Numbers

**Exhibit 1** displays the complete inbound loaded TEU traffic numbers for May 2022 at the North American ports from which we are able to obtain comparable and up-to-date container trade statistics. The most evident finding is that inbound loads through USWC ports were down 4.0% from a year earlier but up 8.0% at USEC ports. In actual numbers, the five major USWC ports handled 43,569 more inbound loads than did the nine USEC ports we monitor. Factoring in the U.S. Gulf Coast ports that provide comparable TEU statistics, the USWC share of all inbound loads in May was 47.5%.

**Exhibit 2** presents data on outbound loaded TEUs in May. Ports on both the East and West Coasts did not distinguish themselves by boosting America's containerized export trade. Loaded outbound TEUs at the five USWC major ports were down 5.0% from May 2021, while 11.2% fewer outbound loads left the USEC ports we track.

**Exhibit 3** shows the total (full + empty) YTD container traffic over the first five months of 2022. The most significant change in the rank order since a year ago involved Houston, which leaped over Vancouver, NWSA, and Virginia to become North America's fifth largest container port.

### Weights and Values

Here we offer an alternative to the customary TEU numbers. The percentages in Exhibits 4 and 5 are derived from data compiled by the U.S. Commerce Department

*We Make Cargo Move*



**The Port**  
**OF HUENEME**



## Exhibit 1

## May 2022 - Inbound Loaded TEUs at Selected Ports

	May 2022	May 2021	% Change	May 2020	% Change	May 2022 YTD	May 2021 YTD	% Change	May 2020 YTD	% Change
Los Angeles	499,960	535,714	-6.7%	306,323	63.2%	2,303,106	2,366,449	-2.7%	1,581,445	45.6%
Long Beach	436,977	444,736	-1.7%	312,590	39.8%	2,044,729	1,958,070	4.4%	1,359,253	50.4%
<b>San Pedro Bay Total</b>	<b>936,937</b>	<b>980,450</b>	<b>-4.4%</b>	<b>618,913</b>	<b>51.4%</b>	<b>4,347,835</b>	<b>4,324,519</b>	<b>0.5%</b>	<b>2,940,698</b>	<b>47.9%</b>
Oakland	98,789	92,558	6.7%	73,423	34.5%	446,509	449,582	-0.7%	371,898	20.1%
NWSA	120,624	134,246	-10.1%	86,129	40.1%	585,003	616,202	-5.1%	461,694	26.7%
Hueneme	10,605	8,210	29.2%	2,712	291.0%	57,470	36,766	56.3%	20,394	181.8%
San Diego	7,522	7,888	-4.6%	7,514	0.1%	33,724	33,950	-0.7%	32,785	2.9%
<b>USWC Total</b>	<b>1,174,477</b>	<b>1,223,352</b>	<b>-4.0%</b>	<b>788,691</b>	<b>48.9%</b>	<b>5,470,541</b>	<b>5,461,019</b>	<b>0.2%</b>	<b>3,827,469</b>	<b>42.9%</b>
Boston	5,667	8,410	-32.6%	10,439	-45.7%	24,110	45,745	-47.3%	58,335	-58.7%
NYNJ	426,423	396,417	7.6%	266,004	60.3%	2,068,369	1,854,409	11.5%	1,444,677	43.2%
Maryland	45,194	46,049	-1.9%	37,741	19.7%	205,087	211,629	-3.1%	205,659	-0.3%
Virginia	166,907	144,916	15.2%	87,669	90.4%	729,551	653,987	11.6%	493,551	47.8%
South Carolina	126,320	107,050	18.0%	73,072	72.9%	636,016	503,348	26.4%	410,833	54.8%
Georgia	253,508	235,687	7.6%	154,730	63.8%	1,183,034	1,143,883	3.4%	827,212	43.0%
Jaxport	24,187	33,940	-28.7%	23,661	2.2%	126,818	143,898	-11.9%	122,577	103.5%
Port Everglades	35,583	30,443	16.9%	19,410	83.3%	170,001	147,511	15.2%	126,636	34.2%
Miami	47,119	44,645	5.5%	29,658	58.9%	222,956	232,381	-4.1%	165,269	34.9%
<b>USEC Total</b>	<b>1,130,908</b>	<b>1,047,557</b>	<b>8.0%</b>	<b>702,384</b>	<b>61.0%</b>	<b>5,365,942</b>	<b>4,936,791</b>	<b>8.7%</b>	<b>3,854,749</b>	<b>39.2%</b>
New Orleans	9,645	11,678	-17.4%	13,725	-29.7%	48,009	53,099	-9.6%	59,256	-19.0%
Houston	158,798	132,853	19.5%	99,509	59.6%	758,850	609,958	24.4%	482,815	57.2%
<b>USGC</b>	<b>168,443</b>	<b>144,531</b>	<b>16.5%</b>	<b>113,234</b>	<b>48.8%</b>	<b>806,859</b>	<b>663,057</b>	<b>21.7%</b>	<b>542,071</b>	<b>48.8%</b>
Vancouver	168,057	183,511	-8.4%	132,473	26.9%	779,241	832,183	-6.4%	650,339	119.8%
Prince Rupert	45,053	56,706	-20.5%	36,439	23.6%	226,746	222,062	2.1%	223,890	1.3%
<b>British Columbia Total</b>	<b>213,110</b>	<b>240,217</b>	<b>-11.3%</b>	<b>168,912</b>	<b>26.2%</b>	<b>1,005,987</b>	<b>1,054,245</b>	<b>-4.6%</b>	<b>874,229</b>	<b>15.1%</b>
<b>US/BC Total</b>	<b>2,686,938</b>	<b>2,655,657</b>	<b>1.2%</b>	<b>1,773,221</b>	<b>51.5%</b>	<b>12,649,329</b>	<b>12,115,112</b>	<b>4.4%</b>	<b>9,098,518</b>	<b>39.0%</b>
<b>US Total</b>	<b>2,473,828</b>	<b>2,415,440</b>	<b>2.4%</b>	<b>1,604,309</b>	<b>54.2%</b>	<b>11,643,342</b>	<b>11,060,867</b>	<b>5.3%</b>	<b>8,224,289</b>	<b>41.6%</b>
<b>USWC/BC Total</b>	<b>1,387,587</b>	<b>1,463,569</b>	<b>-5.2%</b>	<b>957,603</b>	<b>44.9%</b>	<b>6,476,528</b>	<b>6,515,264</b>	<b>-0.6%</b>	<b>4,701,698</b>	<b>37.7%</b>

Source Individual Ports



## Exhibit 2

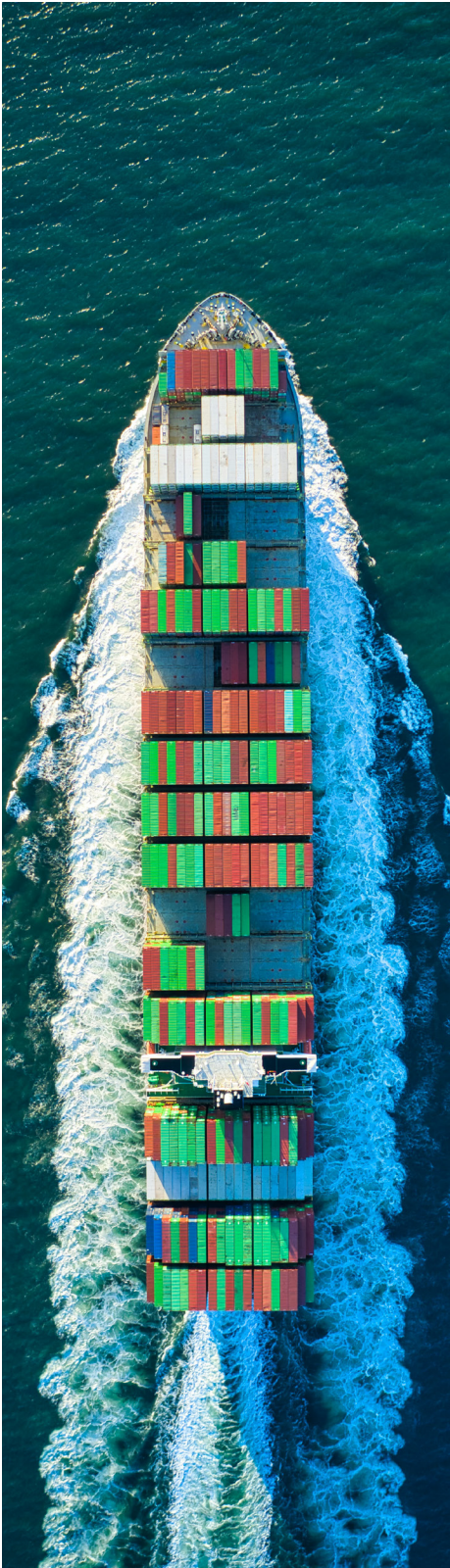
## May 2022 - Outbound Loaded TEUs at Selected Ports

	May 2022	May 2021	% Change	May 2020	% Change	May 2022 YTD	May 2021 YTD	% Change	May 2020 YTD	% Change
Los Angeles	125,656	109,886	14.4%	104,382	20.4%	532,941	567,769	-6.1%	638,524	-16.5%
Long Beach	118,234	135,315	-12.6%	134,556	-12.1%	595,290	634,794	-6.2%	616,683	-3.5%
<b>San Pedro Bay Totals</b>	<b>243,890</b>	<b>245,201</b>	<b>-0.5%</b>	<b>238,938</b>	<b>2.1%</b>	<b>1,128,231</b>	<b>1,202,563</b>	<b>-6.2%</b>	<b>1,255,207</b>	<b>-10.1%</b>
Oakland	75,067	74,726	0.5%	69,720	7.7%	334,817	387,857	-13.7%	391,878	-14.6%
NWSA	45,543	63,558	-28.3%	59,595	-23.6%	229,957	314,876	-27.0%	340,908	-32.5%
Hueneme	3,482	2,052	69.7%	678	413.6%	17,004	9,216	84.5%	5,172	228.8%
San Diego	1,120	971	15.3%	360	211.1%	5,253	2,677	96.2%	1,422	269.4%
<b>USWC Totals</b>	<b>369,102</b>	<b>386,508</b>	<b>-4.5%</b>	<b>369,291</b>	<b>-0.1%</b>	<b>1,715,262</b>	<b>1,917,189</b>	<b>-10.5%</b>	<b>1,994,587</b>	<b>-14.0%</b>
Boston	2,143	5,944	-63.9%	10,439	-79.5%	12,262	31,984	-61.7%	28,685	-57.3%
NYNJ	118,552	134,458	-11.8%	95,462	24.2%	554,480	586,264	-5.4%	561,843	-1.3%
Maryland	22,171	24,651	-10.1%	12,955	71.1%	102,499	107,370	-4.5%	90,338	13.5%
Virginia	97,665	99,717	-2.1%	72,160	35.3%	451,228	462,335	-2.4%	394,241	14.5%
South Carolina	53,312	73,281	-27.2%	52,972	0.6%	286,911	361,039	-20.5%	331,400	-13.4%
Georgia	122,287	137,812	-11.3%	122,271	0.01%	551,883	625,711	-11.8%	627,810	-12.1%
Jaxport	44,588	50,311	-11.4%	38,528	15.7%	227,892	240,896	-5.4%	190,611	19.6%
Port Everglades	35,199	33,655	4.6%	20,643	70.5%	167,153	159,901	4.5%	142,075	17.7%
Miami	28,693	30,790	-6.8%	26,545	8.1%	135,573	146,962	-7.7%	152,579	-11.1%
<b>USEC Totals</b>	<b>524,610</b>	<b>590,619</b>	<b>-11.2%</b>	<b>451,975</b>	<b>16.1%</b>	<b>2,489,881</b>	<b>2,722,462</b>	<b>-8.5%</b>	<b>2,519,582</b>	<b>-1.2%</b>
New Orleans	19,479	26,280	-25.9%	24,176	-19.4%	98,210	116,553	-15.7%	122,826	-20.0%
Houston	106,358	95,439	11.4%	100,538	5.8%	498,778	473,484	5.3%	536,954	-7.1%
<b>USGC Totals</b>	<b>125,837</b>	<b>121,719</b>	<b>3.4%</b>	<b>124,714</b>	<b>0.9%</b>	<b>596,988</b>	<b>590,037</b>	<b>1.2%</b>	<b>659,780</b>	<b>-9.5%</b>
Vancouver	61,801	92,611	-33.3%	96,902	-36.2%	290,520	422,466	-31.2%	444,686	-34.7%
Prince Rupert	10,918	16,313	-33.1%	16,282	-32.9%	61,615	72,710	-15.3%	83,443	-26.2%
<b>British Columbia Totals</b>	<b>72,719</b>	<b>108,924</b>	<b>-33.2%</b>	<b>113,184</b>	<b>-35.8%</b>	<b>352,135</b>	<b>495,176</b>	<b>-28.9%</b>	<b>528,129</b>	<b>-33.3%</b>
<b>US/BC Total</b>	<b>441,821</b>	<b>495,432</b>	<b>-10.8%</b>	<b>482,475</b>	<b>-8.4%</b>	<b>2,067,397</b>	<b>2,412,365</b>	<b>-14.3%</b>	<b>2,522,716</b>	<b>-18.0%</b>
<b>US Total</b>	<b>1,019,549</b>	<b>1,098,846</b>	<b>-7.2%</b>	<b>945,980</b>	<b>7.8%</b>	<b>4,802,131</b>	<b>5,229,688</b>	<b>-8.2%</b>	<b>5,173,949</b>	<b>-7.2%</b>
<b>USWC/BC Total</b>	<b>441,821</b>	<b>495,432</b>	<b>-10.8%</b>	<b>482,475</b>	<b>-8.4%</b>	<b>2,067,397</b>	<b>2,412,365</b>	<b>-14.3%</b>	<b>2,522,716</b>	<b>-18.0%</b>

Source Individual Ports



## May 2022 TEU Numbers Continued



### Exhibit 3

### May 2022 YTD Total TEUs

	May 2022 YTD	May 2021 YTD	% Change	May 2020 YTD	% Change
Los Angeles	4,537,291	4,551,444	-0.3%	3,070,413	47.8%
Long Beach	4,172,366	4,029,531	3.5%	2,830,855	47.4%
<b>San Pedro Bay Ports</b>	<b>8,709,657</b>	<b>8,580,975</b>	<b>1.5%</b>	<b>5,901,268</b>	<b>47.6%</b>
NYNJ	4,034,683	3,645,672	10.7%	2,854,319	41.4%
Georgia	2,396,986	2,293,729	4.5%	1,753,114	36.7%
Houston	1,573,242	1,315,166	19.6%	1,216,877	29.3%
Virginia	1,536,282	1,400,356	9.7%	1,063,446	44.5%
NWSA	1,497,608	1,536,764	-2.5%	1,277,227	17.3%
Vancouver	1,483,585	1,642,089	-9.7%	1,289,308	15.1%
South Carolina	1,240,472	1,103,336	12.4%	939,722	32.0%
Oakland	1,014,846	1,079,299	-6.0%	969,177	4.7%
Montreal	595,529	679,451	-12.4%	698,966	-14.8%
JaxPort	538,155	595,141	-9.6%	488,348	10.2%
Miami	513,551	529,003	-2.9%	423,794	21.2%
Port Everglades	473,333	439,628	7.7%	405,080	16.9%
Prince Rupert	437,494	434,566	0.7%	398,508	9.8%
Maryland	414,177	429,720	-3.6%	419,802	-1.3%
Philadelphia	313,916	284,183	10.5%	255,143	23.0%
New Orleans	183,048	227,874	-19.7%	253,900	-27.9%
Hueneme	109,458	89,800	21.9%	77,958	40.4%
San Diego	67,323	66,785	0.8%	65,409	2.9%
Portland, Oregon	61,567	32,953	86.8%	19,081	222.7%
Boston	46,748	92,697	-49.6%	113,618	-58.9%
<b>US/Canada Total</b>	<b>27,241,660</b>	<b>26,499,187</b>	<b>2.8%</b>	<b>20,884,065</b>	<b>30.4%</b>
<b>US Only Total</b>	<b>24,725,052</b>	<b>23,743,081</b>	<b>4.1%</b>	<b>18,497,283</b>	<b>33.7%</b>

Source Individual Ports



## May 2022 TEU Numbers *Continued*

from documentation submitted by the importers and exporters of record. Commerce then makes the data available with a time-lag of approximately five weeks. Starting this month, we're adding a new line in the tables to reflect the fact that, although the Big Five USWC ports handle the vast majority of the container trade passing through America's Pacific Coast ports, there are other ports on the Left Coast that handle containers. Indeed, it may shock some to learn that the Port of Hueneme in California's Ventura County moves over twice the number of containers handled by the Port of Boston, which also

handles fewer TEUs than do the Ports of San Diego and Portland (the one in Oregon).

**Exhibit 4** testifies to the decline in the USWC share of containerized imports through mainland U.S. ports in May. Still, there was a modest uptick in the USWC share of containerized export tonnage to destinations worldwide.

**Exhibit 5** displays the USWC shares of U.S. containerized trade with East Asia in May. The numbers mutely testify to the erosion of the USWC share of containerized imports from the other side of the Pacific, both in terms

**Exhibit 4** Major USWC Ports Shares of U.S. Mainland Ports Worldwide Container Trade, May 2022

	May 2022	Apr 2022	May 2021
<b>Shares of U.S. Mainland Ports Containerized Import Tonnage</b>			
USWC	36.9%	35.5%	39.0%
LA/LB	27.5%	26.7%	28.9%
Oakland	3.7%	3.2%	4.0%
NWSA	3.8%	3.7%	4.5%
<b>Shares of U.S. Mainland Ports Containerized Import Value</b>			
USWC	41.0%	40.0%	44.3%
LA/LB	32.4%	31.9%	34.5%
Oakland	2.9%	2.7%	3.1%
NWSA	4.6%	4.2%	5.7%
<b>Shares of U.S. Mainland Containerized Export Tonnage</b>			
USWC	34.9%	34.1%	34.1%
LA/LB	21.4%	20.8%	19.7%
Oakland	6.4%	6.7%	6.4%
NWSA	5.3%	5.6%	6.4%
<b>Shares of U.S. Mainland Conatinerized Export Value</b>			
USWC	28.4%	27.2%	28.9%
LA/LB	18.4%	16.8%	17.8%
Oakland	6.1%	6.5%	6.3%
NWSA	2.9%	3.0%	3.7%

Source: U.S. Commerce Department.

**Exhibit 5** Major USWC Ports Shares of U.S. Mainland Ports Containerized Trade with East Asia, May 2022

	May 2022	Apr 2022	May 2021
<b>Shares of U.S. Mainland Ports Containerized Import Tonnage</b>			
USWC	56.5%	54.8%	60.2%
LA/LB	44.8%	44.0%	47.9%
Oakland	4.1%	3.6%	4.3%
NWSA	6.2%	6.0%	7.1%
<b>Shares of U.S. Mainland Ports Containerized Import Value</b>			
USWC	61.1%	59.0%	65.6%
LA/LB	49.4%	48.2%	52.4%
Oakland	3.6%	3.2%	3.8%
NWSA	6.9%	6.4%	8.5%
<b>Shares of U.S. Mainland Containerized Export Tonnage</b>			
USWC	59.4%	59.7%	54.4%
LA/LB	37.6%	38.6%	33.6%
Oakland	9.6%	9.8%	8.7%
NWSA	9.3%	10.2%	10.8%
<b>Shares of U.S. Mainland Conatinerized Export Value</b>			
USWC	56.8%	55.5%	57.9%
LA/LB	37.9%	37.2%	37.7%
Oakland	10.7%	10.6%	11.3%
NWSA	6.7%	6.6%	7.7%

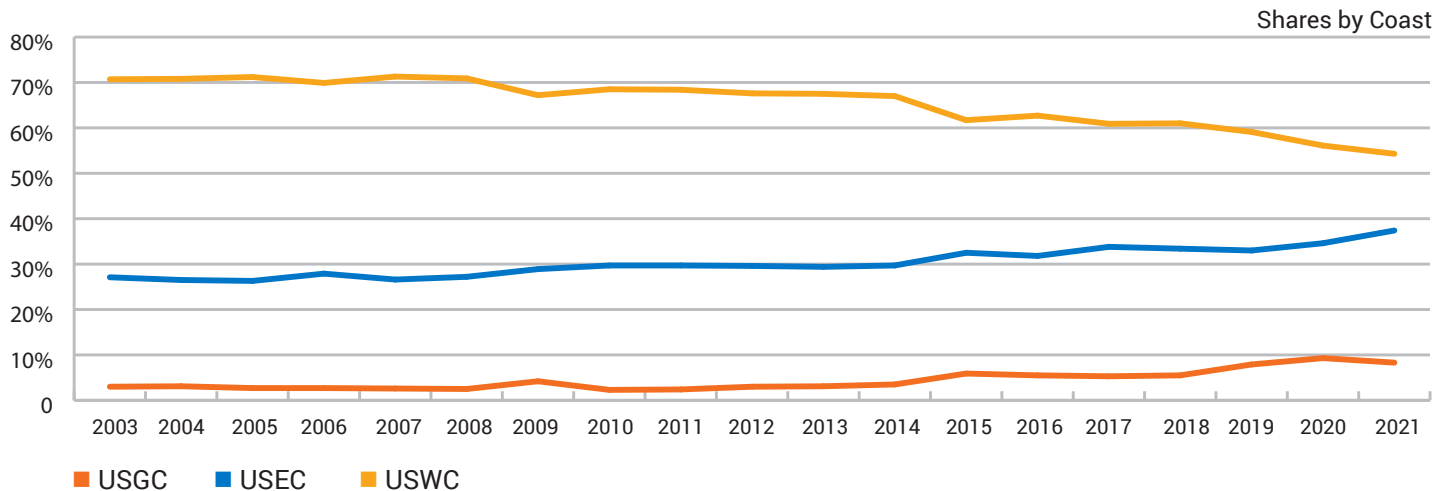
Source: U.S. Commerce Department.

May 2022 TEU Numbers *Continued*

## Exhibit 6

## U.S. Containerized Export Tonnage to East Asia

Source: U.S. Commerce Department



of tonnage and value. On the export side of the ledger, the USWC ports handled a significantly higher share of the containerized tonnage heading across the Pacific than they had a year earlier, even if their share of the value of those exports declined.

### Containerized Exports by Coast

Maritime industry analysts spend a great deal of time pondering the steady migration of the nation's container trade with East Asia from West Coast ports to their East and Gulf Coast rivals. Much less consideration (if any at all) is given to a parallel shift affecting containerized exports to East Asia over the past couple of decades. Here we offer **Exhibit 6**, a chart displaying the fall-off in the USWC share of containerized export tonnage headed to markets on the far side of the Pacific Basin since 2003.

In 2003, as the U.S. was emerging from the bursting of the dot.com bubble, USWC ports accounted for 70.7% of the trade. By last year, that share had diminished to 54.3%.

### Hopefully Some Last (But Probably Not) Statistics About California Tree Nut Exports

There are a couple of issues we have with a lot of what's been reported about the plight of California's exporters of almonds, pistachios, and walnuts. These tree nuts rank among California's top five farm exports by value. And,

since California is America's top agricultural exporter, this is big business.

One allegation has it that tree nut shipments are being stymied by California's ports and by the ocean carriers serving those ports. As a result, growers are stuck with enormous unsold inventories and have had their reputations as reliable sources of tree nuts tarnished. A related assertion is that inhospitable conditions at California's ports – either too many vessels or too few, shipping lines with their own imperatives, and the prospect that obstreperous dockworkers or truckers could disrupt West Coast port operations this summer – have compelled the state's tree nut exporters to divert substantial volumes of their overseas shipments to other U.S. ports, most notably the Port of Houston.

What folks say and what they eventually do are not the same. We remind readers that exporters are obliged **by law** to submit detailed reports to Customs and Border Protection for all shipments valued in excess of \$2500. Those reports become the grist for the trade data compiled and published each month by the Census Bureau's Foreign Trade Division, the federal government's officially designated collector and disseminator of U.S. foreign trade statistics.



### May 2022 TEU Numbers *Continued*

Well, as much as we don't like to spoil a good yarn, we will. Statistically, this business of shipping California tree nuts abroad through the Port of Houston is largely a phantom trade.

Take almonds, for example. Houston not only handled a mere 0.95% of the nation's total almond export tonnage in May (the latest month for which port-of-export data are available), but the 893.7 metric tons of almonds that were shipped from Houston that month was down 14.4% from a year earlier. By comparison, the Ports of Long Beach and Los Angeles handled 16,502 metric tons, while 76,093 metric tons of almonds were shipped from the Port of Oakland. In the end, the three major maritime gateways in California handled 98.6% of all of the nation's oceanborne exports of almonds, California's single most-valuable agricultural export.

A very similar bit of misinformation also seems rife among California's walnut exporters. At the annual meeting of the Agricultural Transportation Coalition on June 15, one prominent agricultural shipper reportedly claimed that "supply chain disruptions at California ports had forced the company to find alternative ports to transport its exports." According to an article in the *American Journal of Transportation*, that shipper insisted that his company was "now utilizing ports on the East and Gulf Coast ports to ship product to Asia." At the same meeting, a California walnut grower purportedly insisted that "walnut exporters continue to face losses due to delays in being able to ship exports on ocean carriers."

So, what do the official data indicate? Among other

things, that Houston doesn't seem to be one of those alternative ports farm exporters tend to mention. Its share of total U.S. exports of Edible Fruits and Nuts to Asia in May was a trifling 0.1%, not much of an improvement over its 0.07% share a year earlier. Further indicative of how long some folks persist in beating the drum long after the tune has changed, the walnut grower's lament at the AgTC rally came two weeks after the end of May, a month in which walnut exports soared by 55.8% year-over-year. Incidentally, the volume of walnuts shipped this May was higher than in any previous May.

But the penchant for distortion only gets worse. On July 8, CNBC aired a report featuring interviews with walnut shippers upset with their alleged inability to move product to overseas customers through the Port of Oakland. What was particularly weird about this report was not merely that the reporter was plainly unaware of May's huge bump in walnut exports. It was that the California Walnut Board was simultaneously releasing shipment numbers for June, which showed walnut exports up 47.8% from a year earlier. As they say in the comedy business, it's all about timing.

And then there are those almonds. There are persistent news reports alleging that almond exporters continue to be stymied by logistical impediments. Typical of this was an NBC report on Sunday, July 10, which claimed that almond growers had a billion-pound inventory they couldn't move because ocean carriers had been denying them space on outgoing vessels. It's as though schools of journalism devote more time to teaching headline construction than basic empirical research. A few keystrokes would

## Protecting Blue Whales and Blue Skies

### Vessel Speed Reduction Incentive Program

A partnership for cleaner air,  
safer whales, and a quieter ocean

[www.bluewhalesblueskies.org](http://www.bluewhalesblueskies.org)





## May 2022 TEU Numbers *Continued*

have allowed the NBC correspondent to see that almond exports had been up 29.4% in May. And, for the record, the California Almond Board also now reports that exports in June were up by 38.3%.

We don't expect to see any news updates, but journalists who were persuaded to file tearful reports in the last two or three months about the supposed travails of California's tree nuts exporters and how they have been getting a raw deal from ocean carriers might be interested in how this year's second quarter export tonnage numbers compared with last year: almonds (+21.9%), walnuts (+40.9%), and pistachios (+53.6%).

While we don't imagine *The New York Times* will send a reporter from Manhattan to Madera to write about the buoyant export trade in tree nuts, any journalist eager to spend a warm afternoon standing in a Central Valley orchard interviewing a nut grower might want to ask why domestic shipments of almonds in the second quarter were down 7.2% from a year earlier, while domestic shipments of walnuts tumbled by 15.9%. Only pistachio growers were able to increase their domestic shipments, but even then by just 4.0%.

## The Cost of the Four Corners Strategy?

Earlier this month, a Tweet by an eminent scribe alerted us to a trade analyst's July 4 report that featured this claim: "*The continued uncertainty [over longshore labor contract talks] is adding over \$100 million a week to US freight costs as shippers have been diverting cargo to the USEC at a significant premium over the USWC rates.*"

We are nothing if not instinctively doubtful of big, round numbers (BRNs), especially those unaccompanied by any hint of methodology. How did the researcher divine the motives behind the diversions? How many containers are involved? And how many may have been diverted for other reasons, like concerns that BNSF wouldn't be able to get those jack-o-lantern shipments to Chicago by Halloween? Could at least some of these diverted boxes hold Aroldis Chapman bobbleheads that desperately needed to be in New York before the Yankee lefthander's career finally imploded? Until we see the analyst's worksheet, we're going to believe the \$100 million a week figure has all the hallmarks of a rough guess.

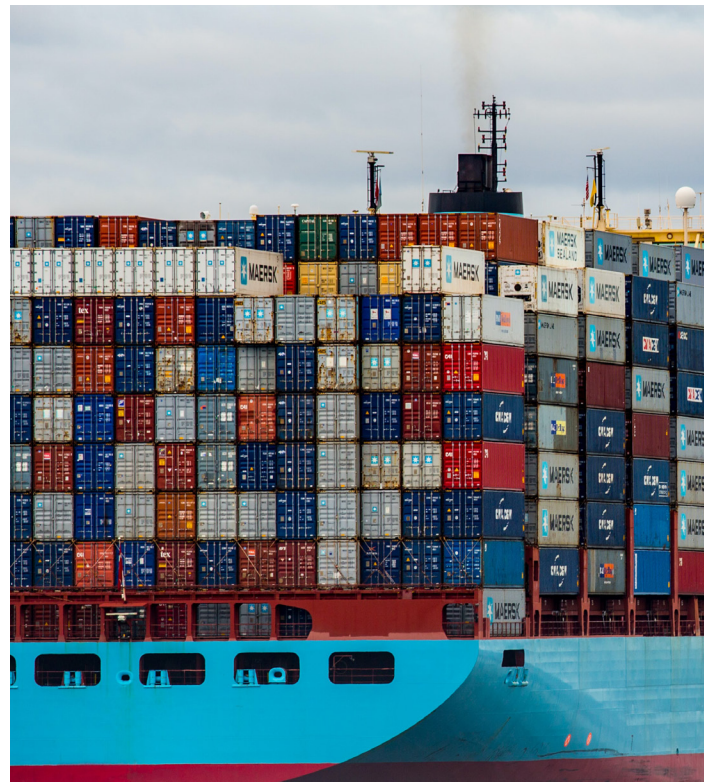
## Jock O'Connell's Commentary: When Markets Confound Algorithms

When recently asked about the prospects for persistently high volumes of containerized imports, the top official at a major U.S. seaport replied: "The containers will keep coming so long as consumers keep buying."

Admittedly, it was a pithy soundbite. In a world that traffics in glib turns of phrase that purport to connect disparate dots, it was evidently persuasive enough to satisfy the interviewer. Accordingly, there is every likelihood that the port official's observation has since been digested as though it were received wisdom by the general public and government policymakers.

Unfortunately, the logistical model implicit in the official's explanation gets the business of importing mostly wrong.

Let me count the ways.





## Commentary Continued

**First**, as I've pointed out before, consumers do not import anything. Sure, there was that "silk" scarf you picked up in Florence last year for your grandmother Philomena in Pacoima. But the fact is that importing consumer goods is the nearly exclusive province of retailers and other intermediaries. As consumers, you and I may go to a store or go online to buy something. But the items we purchase today are, for the most part, available to us only because the merchandise was ordered weeks, if not months earlier. Using their finest but occasionally flawed predictive models, importers are essentially placing bets on what you and I might buy – or might be persuaded by clever marketing to buy – **at some point in the future**.

To say that consumers drive America's containerized import trade collapses time, while obscuring the enormous risks importers bear.

To be sure, consumers are fairly predictable, but consumer sentiment can also shift overnight, even while hundreds of thousands of containers are still at sea. That's what we're seeing right now. Buffeted by steadily higher rates of inflation but also by the grim prospect of a recession that will cost many breadwinners their jobs, American consumers have ample reason for becoming less enthusiastic shoppers. Even if workers hang onto their jobs, their retirement savings are being steadily eroded just as prices of the basic goods they normally buy are spiraling higher. And, in a nation where housing is in short supply, anyone deprived of a paycheck faces the possibility of homelessness.

Not surprisingly, warehouses and distribution centers are reportedly crammed with merchandise that was ordered with high but ultimately unwarranted expectations. Much of that excess inventory will never be sold at retail. Yet, almost perversely, importers continue to flood ports with containers laden with goods that consumers may not be able to afford.

The morale here is that retailers are the agencies placing the orders and driving imports of consumer goods, not the eventual consumers. And what has been contributing mightily to supply chain congestion very much appears to be that retail importers have been more optimistic about future consumer spending patterns than is warranted by the direction the U.S. economy is taking.

So, the boxes will keep arriving in great numbers but not because consumers actually want the merchandise they are bearing.

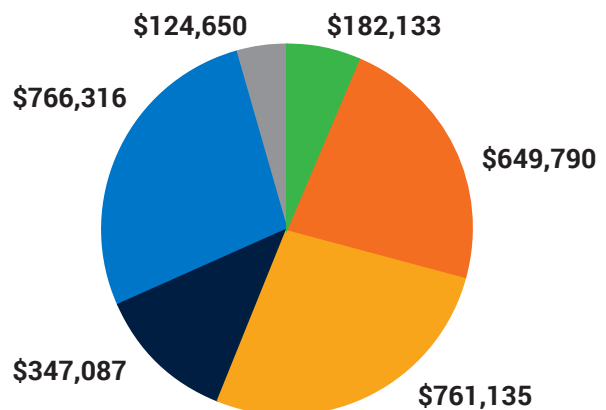
**Second**, despite what the monthly trade reports from the National Retail Federation imply, not all containerized imports are retail goods waiting to be snapped up by individual consumers. Those aircraft components arriving in containers at the Port of Mobile are not headed for the local Target outlet but rather a nearby Airbus assembly line. Likewise, exceedingly few imported MRIs and other high-tech medical diagnostic equipment will wind up at Home Depot. While 4.30 million metric tons of bananas were imported in containers last year, so too were 2.67 million metric tons of gypsum. Containers also brought

### Exhibit A

#### Major End-Use Categories of U.S. Merchandise Imports, 2021

In Millions of Dollars

Source: U.S. Commerce Department



- Foods, Feeds & Beverages
- Industrial Supplies
- Capital Goods
- Automotive Vehicles
- Consumer Goods
- Other Goods



## Commentary Continued

1.55 million metric tons of new tires for automobiles but also 1.26 million metric tons of tires for commercial vehicles.

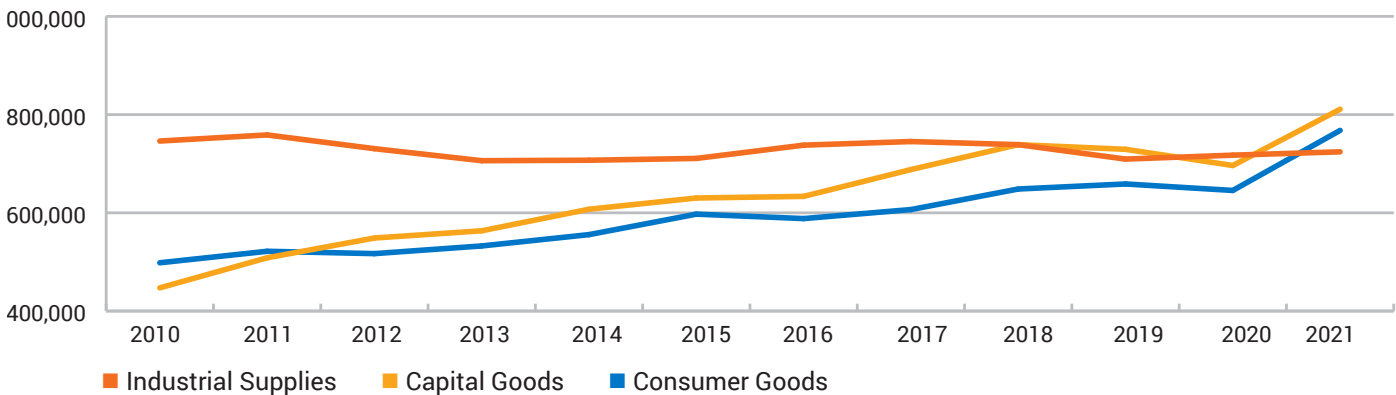
The U.S. Census Bureau's Foreign Trade Division classifies imports as well as exports into some 140 categories according to their end uses. These then are combined into six broad categories. Last year, Consumer Goods accounted for 27.1% of the nation's \$2.83 trillion in merchandise imports. But, as **Exhibit A** attests, the second largest category was Capital Goods (25.7%), with Industrial Supplies (24.2%) holding the third biggest

share. Automotive Vehicles and Parts (12.3%) and Food, Feeds and Beverages (6.4%) accounted for smaller shares, while the ever-popular Other Goods held a 4.4% share.

Admittedly, there is a lot of lane-switching here. Individual Americans consume more than Consumer Goods. They eat a lot of imported food but likely draw the line at imported feeds. They also buy imported tires and auto parts but probably not for school buses or farm tractors. So, there is no reason to believe that all containerized imports are consumer items, even if the NRF's monthly

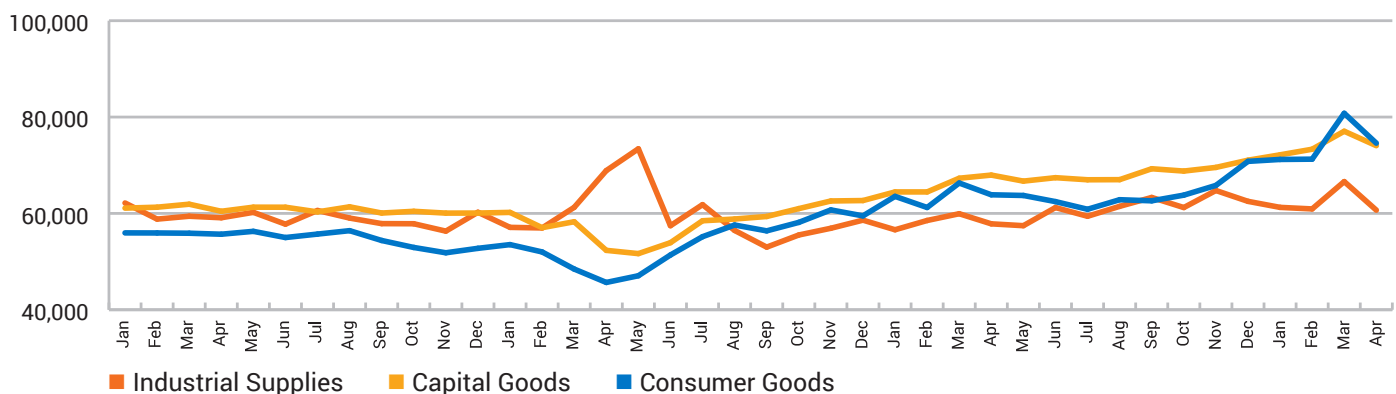
### Exhibit B U.S. Imports by Selected Major End-Use Categories

In Millions of Chained U.S. Dollars  
Source: U.S. Commerce Department



### Exhibit C Real Imports by Major End-Use Categories from January 2019

In Millions of Chained U.S. Dollars  
Source: U.S. Commerce Department





## Commentary Continued

reports (done in collaboration with the Global Port Tracker) label all inbound laden TEUs as “retail imports” and refer to the nation’s principal seaports as “retail ports.”

Why are end-use distinctions important? Because importers of different things do not all dance to the same rhythms. Importers of retail goods are predicting what you and I might want to purchase – often impulsively – weeks or months from now. Construction companies, hospitals, and manufacturing plants importing capital equipment are usually more deliberative in their purchasing decisions. During the pandemic, firms that managed commercial property such as large office buildings and industrial parks had much different needs than companies that sold desks and chairs for home offices.

Consider **Exhibit B**, which looks at the real growth since 2010 in the three largest categories of imported goods. The graph is denominated in dollar values adjusted for price changes. As is immediately evident, imports of Industrial Supplies were remarkably steady throughout the past decade-plus. Likewise manifest is that imports of Capital Goods rose somewhat faster than imports of Consumer Goods until last year.

**Exhibit C** narrows the temporal focus to the months from January 2019 to May 2022 (the latest month for which Census Bureau data are available). As the graph indicates, imports of both Capital Goods and Industrial Supplies

were fairly steady throughout pre-pandemic 2019 even as imports of Consumer Goods began to tail off during the last half of that year. The rapid spread of COVID in early 2020 brought about abrupt drops in Consumer Goods and Capital Goods but a sharp spike in imports of Industrial Supplies. From early fall 2020, imports of Industrial Supplies steadied, while imports of Capital Goods and Consumer Goods were more robust and more or less converged in May 2022.

Anyone out there still think containerized imports are only consumer goods?

**Third**, not all containerized imports are even consumed domestically. Each year, a small but not insignificant portion of all U.S. imports are re-exported without any material change or value added during their stay in the U.S. Last year, containerized shipments of these re-exports (or non-domestic exports) totaled 1,743 million metric tons.

That’s all for this month’s commentary.

But the next time you hear someone claiming that consumers are driving the nation’s containerized import trade, exasperation might not be an inappropriate reaction.

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



## Does California Care?

By Thomas Jelenić, Vice President, Pacific Merchant Shipping Association

As an organization that represents ocean carriers and marine terminal operators, we at PMSA spend an inordinate amount of time thinking about trucks. Yet, as intermodal hubs, ports are dependent on a functioning, competitive trucking system to move goods to and from marine terminals. California is in the midst of developing a regulatory framework to drive carbon emissions in California to zero. For port drayage, the result may not be just environmental transformation, but a complete remaking of a sector that the maritime industry (and, frankly, every American) depends upon. The concern is that the effort may wreck the drayage business in the process.

This newsletter has commented on the upcoming regulatory hurdles the maritime industry faces. Nonetheless, it is important that a closer look be taken at not just the goals of upcoming regulatory efforts, but the means of accomplishing those goals. Before we get into that, there is one thing that is important to understand. While trucks serving California ports are called drayage trucks, drayage trucks are not a type of truck. Instead, drayage refers to the service that is provided. Drayage trucks are interchangeable with any Class 8 heavy-duty truck in California. That is a critical distinction because as cargo volumes change due to Christmas shopping seasons, tariffs, or pandemics, California ports can draw from the larger pool of California trucks – that is one reason the number of “infrequent” trucks serving ports is so large. The California Air Resources Board (CARB) is proposing to put an end to that interchangeability.

The proposed Advanced Clean Fleets (ACF) rule would radically eliminate interchangeability by creating a legacy drayage fleet on January 1, 2024. Any trucks not part of the legacy fleet must be zero emissions (ZE) after this

date. As a result, any changes in cargo flows could only be met by ZE trucks; something that will be extraordinarily challenging in the first years of implementation due to factors including current technological and economic feasibility of ZE trucks and the complete lack of necessary fueling infrastructure.

One of the concerns about CARB’s analysis of how the rule will work is that it did not take into account “churn”. The trucks that serve California ports change for numerous reasons: new customers, loss of customers, new opportunities in other trucking sectors, new trucking businesses, or going out of business. Churn is important because the proposed ACF will require ongoing service to the ports; trucks that do not serve the port in a given year will lose future access, shrinking the legacy fleet. When the port drayage fleet is indistinguishable from the larger California fleet, this dynamic is invisible. But with a fixed and shrinking legacy fleet, churn will accelerate the shrinking of that fleet.

PMSA requested data from the ports of Long Beach and Los Angeles’ Port Drayage Truck Registry between 2013 and 2021. For each year, the number of trucks that lost permission to serve the ports and the number of trucks that gained new access to the ports

was pulled from the data. The results are significant. Over the study period, 15%, on average, of all drayage trucks lost access to the ports in any given year. In addition, the trucks that obtained access to the ports represented 17% of the population. The difference represents the growth over time of drayage capacity.

Based on the current population of approximately 21,000 trucks providing drayage service to the ports of Long Beach and Los Angeles, the legacy fleet would shrink by





## Does California Care? Continued

over 3,000 trucks in 2024, the first year of implementation of ACF. Based on the historical average of new truck entrants to the San Pedro Bay drayage pool, over 4,500 ZE trucks would need to be added in the first year of implementation. That is a significant number of new ZE trucks in a market that relies overwhelmingly on trucks procured in the secondary used truck market.

More concerning than the volume of ZE trucks is lack of infrastructure. That number of trucks would require approximately 380 charging stations to be installed every month in the first year of implementation or 31 charging stations every single day.

Given that independent owner/operators (IOOs) serve California ports, the charging infrastructure described above will need to be public charging facilities. These IOOs are not part of large truck fleets and will need to rely on public-facing charging infrastructure. As a result, IOOs will not be the ones that initiate infrastructure development. Infrastructure must come early either from public agencies or the private sector. With less than 18 months to the proposed implementation date, the level of investment necessary to support the foreseeable market churn of port drayage does not exist.

Depending on the details of the final rule, ACF will transition these truckers either into clean trucks or transition them out of business. It is worth remembering that the ports of Long Beach and Los Angeles' original Clean Trucks Program pushed thousands of IOOs out of business due to its requirements, often due to the fact that IOOs could not financially qualify to purchase a new truck. "Luckily", this was coincident with the Great Recession, which pushed down cargo volumes and did not unduly constrict trucking capacity.

The rapid decline of the legacy fleet in early years coupled with the number of ZE truck deployments and needed infrastructure foreshadows a significant capacity crunch that will result in disruptions to California's and the nation's supply chain in the early years of ACF implementation.

Ultimately, if California cares about its supply chain and the people who work in it, the ACF must consider the population it is regulating and how that will impact the ability to move cargo throughout the supply chain.

If California cares.



## Time to Transform

Working to meet today's challenges, preparing for tomorrow.



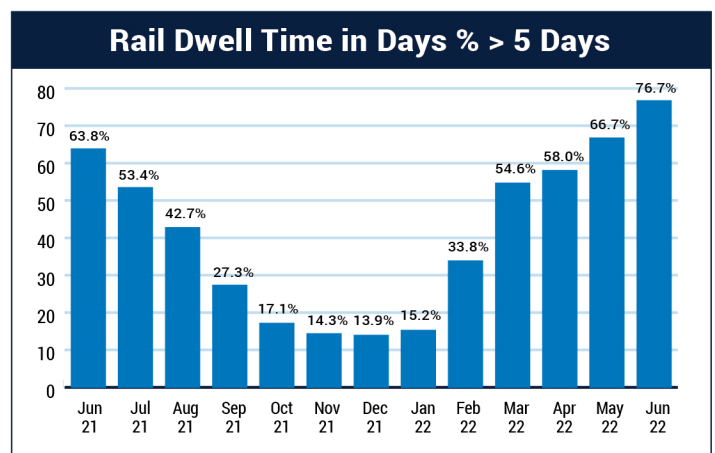
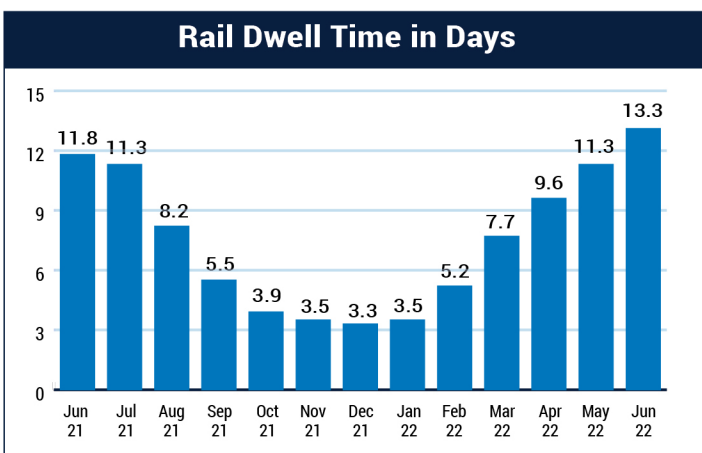
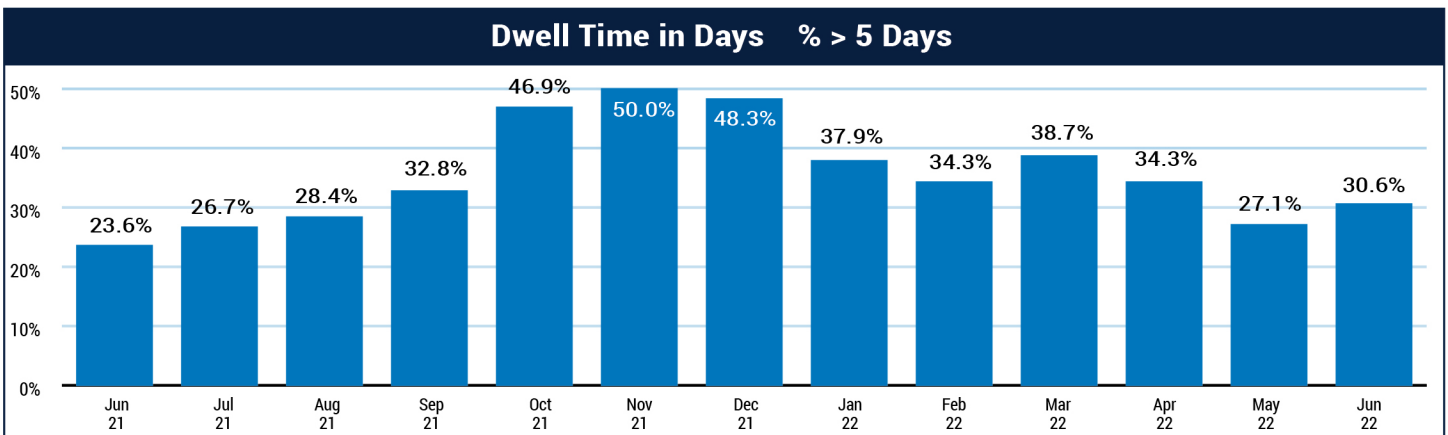
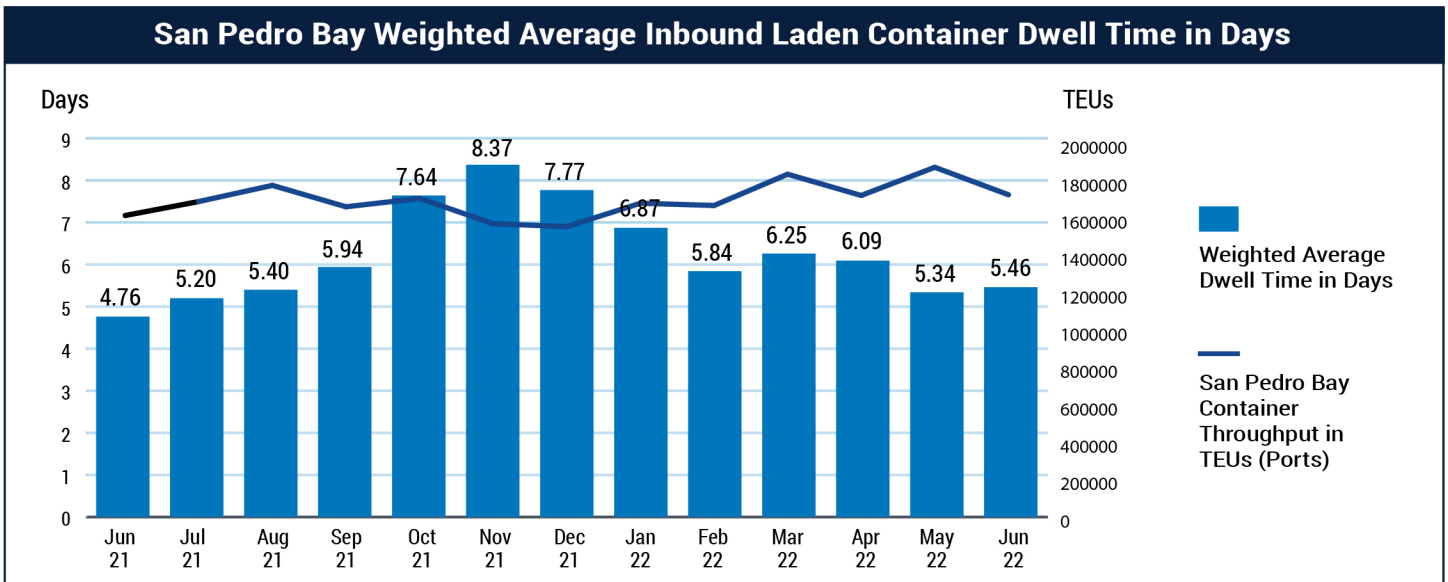
Port of **LONG BEACH**  
THE PORT OF CHOICE

### Interested in membership in PMSA?

Contact Laura Germany for details at: [lgermany@pmsaship.com](mailto:lgermany@pmsaship.com) or 510-987-5000.



## Import Dwell Time and Rail Dwell Time Are Up For June



PMSA Copyright © 2022

It is prohibited by law to forward this publication to any other person or persons. This material may not be re-published, broadcast, rewritten or distributed without written permission from PMSA. Follow PMSA on Twitter @PMSAShip and Facebook.

# WA State Board of Pilotage Commissioners

Industry Update: August 16, 2022 BPC Meeting

## Vessel Arrivals – Cargo Down, Tank & Cruise Up Through July

Year to Date – **Cargo Vessels Down 6.8%** From Last Year's Low Numbers After Separating Out Cruise

🚢 Containers <b>down 75</b>	🚢 Car Carriers <b>down 25</b>
🚢 Bulkers up 1 (down 5 in July)	🚢 Tankers up 45
🚢 General up 14 (down 5 in July)	🚢 ATB's up 13
🚢 RoRo up 4	🚢 Cruise up 164

Container arrivals **down 13.6%** and well below pre-COVID years. Car carrier arrivals are **down 20% YTD** while Tankers/ATB's are **up 19.2% YTD** and per the announced return, Cruise is up and running.

## FMC Fact Finding Investigation Finds 'Vigorous' Competition in Container Shipping

*Worth repeating given ongoing allegations by some*

**FMC Fact Finding Excerpt:** *"Furthermore, a reassuring data trend indicates that the individual ocean carriers within each alliance continue to compete on pricing and marketing independently and vigorously. Individual ocean carriers within alliances continue to add and withdraw vessels from trades both inside and outside the alliances in which they participate and, particularly in the transpacific, new entrants have been entering the trade. The transpacific is a highly contestable market."*

## Pilot Service Supply, Demand & Delays

- ✓ Again, pilot delays significantly increased from 2.98/month in the 18 months prior to last July.
- ✓ Implementation of efficiencies should decrease pilot delays but...?
- ✓ Cruise season peaks are not new and fully expected with a schedule announcement well ahead of the season
- ✓ The ratio of licensed pilots to average daily assignment workload remains more than two to one even during this peak season... why so many delays?

### Recommendation:

- ✓ *We continue to recommend BPC require tracking daily number of pilots on duty AND available each day (and if not, why not) and compare that to the assignment workload each day to shed light on causes of delays.*
- ✓ *Track number of attempted call backs each day, rejections, acceptance. This metric should be set up to identify underperforming pilot rate of rejections (less than average share of assignments being completed unless appointed by State/BPC to Committees like BPC, TEC which impacts those particular pilots availability based on meetings during duty weeks.*
- ✓ *Include level of assignment and level of pilot in the information in synch with the dispatch system which must match the license level of the pilot to the requirements of the assignment.*

## PMA ILWU Contract and Rail Negotiations Continue...

## **PMSA says California nut exports via California ports are rising**

American Journal of Transportation by [Stas Margaronis](#) Jul 27, 2022

There's a controversy over California nuts. Specifically, nuts exported through California ports. Are the export nut totals up or down? Are the nut exports being diverted to other ports as has been suggested by media reports?

According to the Pacific Merchant Shipping Association's (PMSA) West Coast Trade Report for June 2022 California tree nut exports shipped through California ports, including the Port of Oakland, are rising and there is little evidence that exporters are utilizing the Port of Houston as an alternative export port.

Note: See the PMSA Trade Report for June provided to BPC; the takeaway is that many reports about Ag Exports, Ocean Carriers and Supply Chain have not included data showing volumes exported instead using anecdotal stories to paint a picture; facts should matter.

## **BNSF, UP metering inland containers from LA-LB**

JOC Ari Ashe, Senior Editor | Jul 25, 2022 3:36PM EDT

BNSF Railway and Union Pacific Railroad are metering how many ocean containers they haul from the ports of Los Angeles and Long Beach because they say shippers are not retrieving containers from inland ramps and returning chassis fast enough to create room for additional cargo.

Note: We have mentioned the issue of loaded containers not being picked up fast enough at terminals or within the entire system; this is the same issue only inland for the RR's and the supply chain is connected back to the terminals/ships.

## **Slipping US intermodal performance linked to warehouse capacity crunch**

JOC Ari Ashe, Senior Editor | Jul 12, 2022 4:07PM EDT

The growing dearth of warehouse capacity throughout the US is now manifesting itself in the deteriorating performance of Class I railroads, who are facing slower trains and sub-par schedule reliability as containers stack up at inland depots and terminals amid a lack of inventory churn...There is a new variable this year that didn't exist pre-pandemic: idling containers and chassis.

Chassis providers DCLI and TRAC Intermodal have told JOC.com that shippers are sitting twice as long on marine chassis compared with pre-pandemic days, while other shippers are simply leaving import containers to sit in rail and marine terminals because they have either too much inventory or the wrong inventory clogging their warehouses...The disruption has caused the supply chain to slow again in Chicago, Dallas, and Memphis...Domestic intermodal performance is also suffering through slower box turns, a measure of how many loads an average container handles per month and another way to track how quickly shippers unload cargo.

## **'The Disneyland effect': The real reason the U.S. supply chain is still overloaded**

Yahoo [Dani Romero](#) Sun, August 7, 2022

As peak shipping season kicks off, America's busiest ports are once again experiencing congestion and container vessels waiting off U.S. coastlines...Some experts are calling it "the Disneyland effect."

"If you go to Disneyland or Disney World and use the app and it tells you how long it takes to wait for a ride, everybody sees that Space Mountain is 55 minutes and Indiana Jones is 15," explained Nathan Strang, director of ocean trade lane management at Flexport. "Everyone runs over to Indiana Jones and when you get there, the line is 60 [minutes long]."

Southern California dealt with a traffic jam unlike any other during the pandemic that resulted in a record number of container ships waiting in the waters outside the ports of Los Angeles and Long Beach...The situation has improved off the coast of LA...and the backlog fell from a record 109 vessels to 21, according to Marine exchange.

But in the meantime, shippers have been routing more traffic toward ports in the Atlantic Ocean and the Gulf of Mexico. This trend has been going on for a while, according to East Coast port officials.

## Jul-2022

## Activity

## Callback Days/Comp Days

On watch assignments	620	Call back assignments	117	CBJ ratio	15.88%
----------------------	-----	-----------------------	-----	-----------	--------

### A. Training & Continuing Education Programs

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

Start Dt	End Dt	City	Group	Meeting Description	Pilot Attendees
6-Jul	6-Jul	Aberdeen	BPC	Orientation	ANT, BEN
13-Jul	13-Jul	Port Angeles	PSP	Legislative Tour	VON**
14-Jul	14-Jul	Seattle	PSP	BOD	ANA, COR, GRD*, GRK*, KLA*, MYE
15-Jul	15-Jul	Seattle	PSP	President	KLA*
18-Jul	18-Jul	Seattle	BPC	TEC	ANT*, BEN*, NIN
18-Jul	18-Jul	Port Angeles	PSP	Legislative Tour	VON**
18-Jul	18-Jul	Tukwila	PSP	NC Power Systems	SEM*

19-Jul	19-Jul	Seattle	BPC	BPC	ANT*, BEN*			
20-Jul	20-Jul	Seattle	PSP	Propeller Club	KLA*			
26-Jul	26-Jul	Seattle	PSP	Green Marine	ROU			
28-Jul	28-Jul	Seattle	BPC	Pilot Safety Committee	ANA, SCR			
					* on watch	off watch	paired to assign.	
					10	9	2	

#### Safety/Regulatory

#### Outreach

#### Administrative

#### C. Other (i.e. injury, not-fit-for-duty status, COVID risk)

Start Dt	End Dt	REASON	PILOT
1-Jul	31-Jul	NFFD	HAM, HED
1-Jul	5-Jul	Covid	SEA
1-Jul	9-Jul	Covid	LOB
11-Jul	21-Jul	Covid	COR

#### PSP Efficiency Measures

Combined an intra-port assignments with harbor shift 29 times.

Combined meetings with revenue assignments 2 times.

Combined cancellations with intra-port assignments 2 times.

Utilized immediate repo rule 9 times. This allowed pilots to be assigned on the Seattle side quicker than on the PA side.

Reduced call time between 1830-0759 allowed 24 pilots to be assigned, while prior rules would not have allowed for this

Reduced call times between 1830-0759 reduced the 3&O type jobs by 25.

Below is a comparison of activity reports from May, June, and July highlighting increased opportunities to utilize PSP's new efficiency measures. The timing of assignments in July afforded many more opportunities to use these efficiency measures than in May or June. July represents a favorable trend but still depicts a pilotage system that will benefit further by staffing the pilot corps at the authorized 56-pilot level.

Month	Jobs	Pilot Delays	CBJ Ratio	Combined Intra-Port and Harbor shift jobs	Three and Out	NFFD or Covid			
May	701	214	18%	9	50	71			
June	709	242	22%	15	47	131			
July	737	151	16%	29	40	84			

**State of Washington**  
**Pilotage Commission**  
**August 16, 2022**

**Grays Harbor District Report**

There were 7 arrivals in July for a total of 21 jobs. Year to date through June there have been 30 arrivals for a total of 87 jobs. There are 6 vessels scheduled for August: 3 dry bulk, 2 liquid bulk and 1 logger.

**Dredging**

The Port conducted its semi-annual condition surveys at all four terminals in early May. The surveys indicated almost no increase in sedimentation at Terminal 3, normal accumulations at Terminals 1 and 2, and a significant accumulation at Terminal 4 due to the Jet Array which has been down for since the last round of dredging in February.

Dredging began on July 16 and was completed on July 24. The results were as follows:

- Terminal 1 – 10,250 cubic yards
- Terminal 2 – 30,606 cubic yards
- Terminal 4 – 54,071 cubic yards

The Port will complete another condition survey in November in preparation for the next round of dredging in early February 2023.

**Pilot Trainees**

Captain Bobby D'Angelo continues to guide Pilot Trainees Captain Ryan Leo and Captain Colby Grobschmit through their training programs. Captain Leo has completed an astounding 82 trips in his training program. He has completed the Observation Phase and is very close to completing the Training Phase. Next, he will begin the crucial part of piloting vessels on his own in the Evaluation Phase.

Captain Leo has been approved to sit for the Federal Pilotage exam and he should be able to schedule the exam in early September.

Pilot Trainee Captain Colby Grobschmit continues to progress through the Observation Phase. He has completed the Initial Familiarization/Observation Section and is currently in the Initial Route Section observing pilot jobs between sea and the dock or anchor.

Captain Grobschmit has applied for his Federal Pilotage License as well.



STATE OF WASHINGTON  
**BOARD OF PILOTAGE COMMISSIONERS**

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

**MEMORANDUM**

TO: Board of Pilotage Commissioners

FROM: Staff

DATE: 09 August 2022

SUBJECT: WAC 363-116-082 Limitations on new pilots

---

Hello,

The TEC is beginning the process of reviewing and updating, as necessary, WACs corresponding to the Training Program. The first one is [WAC 363-116-082 Limitations on new pilots](#).

In your meeting packets, you will find a redline of proposed changes along with comments outlining the reasoning behind many of them.

In general, the nature of vessel traffic has changed in both the Puget Sound and Grays Harbor Pilotage Districts. To further the Board's mission of safety, the focus of license upgrade trips should be on the most beneficial trips possible. The changes proposed in both districts provides the flexibility the TEC needs in prescribing the trips.

For example, in GH, vessels are no longer going up through the Chehalis River Bridge. Removing that requirement, and the other specified trips requirements in the WAC, allows the TEC to tailor upgrade programs based on the current vessel traffic.

If you have any questions prior to discussion at the meeting on 16 August 2022, please feel free to contact me and/or Commissioner Bendixen.

Thanks,  
Jaimie



# PROPOSED RULE MAKING

## CR-102 (July 2022) (Implements RCW 34.05.320)

Do NOT use for expedited rule making

CODE REVISER USE ONLY

**Agency:** Washington State Board of Pilotage Commissioners

☐ Original Notice

☐ Supplemental Notice to WSR \_\_\_\_\_

☐ Continuance of WSR \_\_\_\_\_

☐ Preproposal Statement of Inquiry was filed as WSR 22-15-117 ; 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 363-116-082 Limitations on new pilots

**Hearing location(s):**

Date:	Time:	Location: (be specific)	Comment:
October 20, 2022	10:00am	Via MS Teams	To request a video link, please call (206) 515-3887 or visit <a href="http://www.pilotage.wa.gov">www.pilotage.wa.gov</a> for call-in instructions

**Date of intended adoption:** \_\_\_\_\_ (Note: This is NOT the effective date)

**Submit written comments to:**

Name: Jaimie Bever, Executive Director

Address: 2901 3<sup>rd</sup> Avenue, Suite 500, Seattle, WA 98121

Email: [BeverJ@wsdot.wa.gov](mailto:BeverJ@wsdot.wa.gov)

Fax:

Other:

By (date) October 13, 2022

**Assistance for persons with disabilities:**

Contact Jolene Hamel

Phone: (206) 515-3904

Fax:

TTY:

Email: [HamelJ@wsdot.wa.gov](mailto:HamelJ@wsdot.wa.gov)

Other:

By (date) October 13, 2022

**Purpose of the proposal and its anticipated effects, including any changes in existing rules:** The purpose of this proposed rulemaking is to consider revisions to the pilot license upgrade programs in both the Puget Sound and Grays Harbor Pilotage Districts to better align with statutory rest rules and changes in vessel traffic. The Board seeks to ensure that upgrading pilots are gaining the necessary experience with larger vessels as they progress through their first five years of piloting while also maintaining best practices in fatigue mitigation and reducing stress on the pilot corps.

**Reasons supporting proposal:** The proposed revisions to the pilot upgrade program will allow for more flexibility in upgrade program design, implement statutory rest rules, provide more availability for pilots to take jobs, reduce workload on pilots, allow for cruise ship upgrades, allow pilots to upgrade in more adverse weather, increase experience practicing speed from anchor as well as docking and undocking via harbor shifts, and provides better clarity to develop the upgrade trips and for upgrading pilots to accommodate the trip requirements while actively piloting.

**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:** The Board received a recommendation from the Trainee Evaluation Committee (TEC) favoring implementation of the proposed language based on the benefits listed above. The TEC develops and monitors the pilot license upgrade program.

<b>Type of proponent:</b> <input type="checkbox"/> Private <input type="checkbox"/> Public <input checked="" type="checkbox"/> Governmental <b>Name of proponent:</b> (person or organization) Washington State Board of Pilotage Commissioners			
<b>Name of agency personnel responsible for:</b>			
	Name	Office Location	Phone
Drafting:	Jaimie C. Bever	2901 3 <sup>rd</sup> Avenue, Suite 500, Seattle, WA 98121	206-515-3887
Implementation:	Board of Pilotage	2901 3 <sup>rd</sup> Avenue, Suite 500, Seattle, WA 98121	206-515-3904
Commissioners			
Enforcement:	Board of Pilotage	2901 3 <sup>rd</sup> Avenue, Suite 500, Seattle, WA 98121	206-515-3904
Commissioners			
<b>Is a school district fiscal impact statement required under <a href="#">RCW 28A.305.135</a>?</b>			<input type="checkbox"/> Yes <input checked="" type="checkbox"/> 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:			
<b>Is a cost-benefit analysis required under <a href="#">RCW 34.05.328</a>?</b>			
<input type="checkbox"/> Yes: A preliminary cost-benefit analysis may be obtained by contacting: Name: Address: Phone: Fax: TTY: Email: Other:			
<input checked="" type="checkbox"/> No: Please explain: RCW 34.05.328 does not apply to the adoption of these rules. The Washington State Board of Pilotage Commissioners is not a listed agency in RCW 34.05.328(5)(a)(i).			
<b>Regulatory Fairness Act and Small Business Economic Impact Statement</b> Note: The <a href="#">Governor's Office for Regulatory Innovation and Assistance (ORIA)</a> provides support in completing this part.			
<b>(1) Identification of exemptions:</b> This rule proposal, or portions of the proposal, <b>may be exempt</b> from requirements of the Regulatory Fairness Act (see <a href="#">chapter 19.85 RCW</a> ). For additional information on exemptions, consult the <a href="#">exemption guide published by ORIA</a> . Please check the box for any applicable exemption(s):			
<input type="checkbox"/> This rule proposal, or portions of the proposal, is exempt under <a href="#">RCW 19.85.061</a> 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:			
<input type="checkbox"/> This rule proposal, or portions of the proposal, is exempt because the agency has completed the pilot rule process defined by <a href="#">RCW 34.05.313</a> before filing the notice of this proposed rule.			
<input type="checkbox"/> This rule proposal, or portions of the proposal, is exempt under the provisions of <a href="#">RCW 15.65.570(2)</a> 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:
- |   |  |
|---|--|
| <input type="checkbox"/> <a href="#">RCW 34.05.310</a> (4)(b)<br>(Internal government operations) | <input checked="" type="checkbox"/> <a href="#">RCW 34.05.310</a> (4)(e)<br>(Dictated by statute)  |
| <input type="checkbox"/> <a href="#">RCW 34.05.310</a> (4)(c)<br>(Incorporation by reference)     | <input type="checkbox"/> <a href="#">RCW 34.05.310</a> (4)(f)<br>(Set or adjust fees)  |
| <input type="checkbox"/> <a href="#">RCW 34.05.310</a> (4)(d)<br>(Correct or clarify language)    | <input type="checkbox"/> <a href="#">RCW 34.05.310</a> (4)(g)<br>((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 19.85.025\(4\)](#) (does not affect small businesses).
- ☐ This rule proposal, or portions of the proposal, is exempt under RCW \_\_\_\_\_.  
Explanation of how the above exemption(s) applies to the proposed rule:

**(2) Scope of exemptions:** *Check one.*

- ☒ The rule proposal is fully exempt (*skip section 3*). Exemptions identified above apply to all portions of the rule proposal.
- ☐ The rule proposal is partially exempt (*complete section 3*). The exemptions identified above apply to portions of the rule proposal, but less than the entire rule proposal. Provide details here (consider using [this template from ORIA](#)):
- ☐ The rule proposal is not exempt (*complete section 3*). No exemptions were identified above.

**(3) Small business economic impact statement:** *Complete this section if any portion is not exempt.*

If any portion of 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 minor cost analysis and how the agency determined the proposed rule did not impose more-than-minor costs. \_\_\_\_\_
- ☐ Yes Calculations show the rule proposal likely imposes more-than-minor cost to businesses and a small business economic impact statement is required. Insert the required small business economic impact 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

**Name:** Jaimie C. Bever

**Title:** Executive Director

**Signature:**

Place signature here

**WAC 363-116-082 Limitations on new pilots.** (1) The

following limitations and pilot license upgrade requirements shall apply to a newly licensed pilot during their first five years of active service. For purposes of this section, the term "tank vessel" shall, in addition to tank ships, include any articulated or integrated tug and tank barge combinations, and any tonnage restrictions thereon shall be calculated by including the gross tonnage of the tug and tank barge combined. For purposes of this section, the term "petroleum products" shall include crude oil, refined products, liquefied natural gas, and liquefied petroleum gas. GT (ITC) as used in this section refers to gross tonnages measured in accordance with the requirements of the 1969 International Convention on Tonnage Measurement of Ships.

(2) Puget Sound pilotage district - License limitation periods. Except for trips being made for pilot license upgrades, licenses issued in the Puget Sound pilotage district shall have the following limitations:

<b>License Year</b>	<b>Maximum Size of Tank Vessels Carrying Petroleum Products as Bulk Cargo</b>	<b>Maximum Size of Other Vessels</b>	<b>Waterways</b>
1	Piloting on vessels of any size prohibited	38,000 GT (ITC) except for passenger vessels which may	Prohibited in the Duwamish Waterway on vessels greater

License Year	Maximum Size of Tank Vessels Carrying Petroleum Products as Bulk Cargo	Maximum Size of Other Vessels	Waterways
		only have a maximum size of 5000 GT (ITC)	than 3,000 GT
2	32,000 GT (ITC)	48,000 GT (ITC)	No restrictions
3	40,000 GT (ITC)	60,000 GT (ITC)	No restrictions
4	50,000 GT (ITC)	70,000 GT (ITC)	No restrictions
5	65,000 GT (ITC)	95,000 GT (ITC)	No restrictions


(3) Puget Sound pilotage district - Pilot license upgrade requirements. Progressive lifting of tonnage limitations requires a newly licensed pilot to satisfactorily pilot vessels on the trips specified in this section. The trainee evaluation committee shall recommend to the board a series of trips to be made by each pilot in the last one hundred eighty days of each year of the license limitation periods specified in subsection (2) of this section. As to these trips, the trainee evaluation committee shall specify the size and type of the vessel; origin and destination, whether the transit is to include a docking, waterway transit or other particular maneuvering requirement, whether any tank vessel trips are to be made while in ballast or loaded and whether the trip shall be taken with training pilots, trainee evaluation committee member pilots or pilots with a specified experience level. To the extent practical, the trips shall be on vessels of at least a size that falls between the

upper limit in the expiring license limitation and the upper limit in the upcoming license limitation period. All of these trips shall be complete trips between one port and another port, between the pilot station and a port, or harbor shifts. The supervising pilots shall complete and submit to the board a familiarization form provided by the board for each trip a new pilot performs.

(4) Grays Harbor pilotage district - License limitation periods. Pilots licensed in the Grays Harbor pilotage district shall not pilot vessels in violation of the restrictions set forth in the table below during the indicated license year.

License Year	Maximum Size of Tank Vessels Carrying Petroleum Products as Bulk Cargo	Maximum Size of Other Vessels
1	Piloting on vessels of any size prohibited	32,000 GT (ITC) except that piloting on vessels of any size is prohibited through the Chehalis River Bridge unless vessel is in ballast and does not exceed 25,000 GT (ITC)
2	15,000 GT (ITC)	42,000 GT (ITC)
3	32,000 GT (ITC)	52,000 GT (ITC)
4	42,000 GT (ITC)	62,000 GT (ITC)
5	52,000 GT (ITC)	72,000 GT (ITC)

Notwithstanding subsection (7) of this section, upon determination that a bona fide safety concern may result from no pilot without license restrictions being available within a reasonable time to pilot a vessel requiring pilotage services, the chairperson or acting chairperson of the board, on a single trip basis, may authorize a newly licensed pilot holding a restricted license to provide pilotage services to the vessel, irrespective of the tonnage, service or location of the assigned berth of the vessel.

(5) Grays Harbor pilotage district - Pilot license upgrade requirements -  Progressive lifting of tonnage limitations requires a newly licensed pilot to satisfactorily pilot vessels on the trips specified in this section. The trainee evaluation committee shall recommend to the board a series of trips to be made by each pilot in the last one hundred eighty days of each year of the license limitation periods specified in subsection (4) of this section. As to these trips, the trainee evaluation committee shall specify the size and type of the vessel; origin and destination, whether the transit is to include a docking, waterway transit or other particular maneuvering requirement,

whether any tank vessel trips are to be made while in ballast or loaded and whether the trip shall be taken with training pilots, trainee evaluation committee member pilots or pilots with a specified experience level. To the extent practical, the trips shall be on vessels of at least a size that falls between the upper limit in the expiring license limitation and the upper limit in the upcoming license limitation period. All of these trips shall be complete trips between one port and another port, between the pilot station and a port, or harbor shifts. The supervising pilots shall complete and submit to the board a familiarization form provided by the board for each trip a new pilot performs.



(a) If vessels are not available in the Grays Harbor pilotage district to allow a pilot to comply with this subsection in a timely manner, the board may designate substitute trips in the Puget Sound pilotage district as allowed by law and in so doing may specify the size of the vessel and any other characteristics of the trips that the board deems appropriate. Such designation shall be considered a modification of the

pilot's state license to authorize the specified trips in the Puget Sound pilotage district.

(6) The initial license shall contain the limitations contained above and list the date of commencement and expiration of such periods. If a newly licensed pilot is unable to pilot for forty-five days or more in any one of the five years, the trainee evaluation committee may put a hold on the upgrade program. Upon the newly licensed pilot's return to the program, the trainee evaluation committee may prescribe an extension.

(7) Except as provided in subsection (4) of this section, no pilot shall be dispatched to, or accept an assignment on, any vessel which exceeds the limitations of their license. On vessels in which there is more than one pilot assigned, the license limitations shall apply only to the pilot in charge.

(8) All limitations on a pilot's license shall be lifted at the beginning of the sixth year of piloting provided they have submitted to the board a statement attesting to the fact that the pilot has completed all the required license upgrade trips and the vessel simulator courses.

(9) Whenever the governor issues a proclamation declaring a

state of emergency, the board may determine whether there is a threat to trainees, pilots, vessel crews, or members of the public. Notwithstanding the other provisions of this chapter, the board, at its discretion, may suspend or adjust the pilot training program during the pendency of a state of emergency lawfully declared by the governor.

[Statutory Authority: Chapter 88.16 RCW. WSR 20-12-065, § 363-116-082, filed 6/1/20, effective 7/2/20; WSR 19-06-007, § 363-116-082, filed 2/22/19, effective 3/25/19; WSR 15-04-136, § 363-116-082, filed 2/4/15, effective 3/7/15. Statutory Authority: Chapter 88.16 RCW and 2008 c 128. WSR 08-15-119, § 363-116-082, filed 7/21/08, effective 8/21/08. Statutory Authority: RCW 88.16.105 and 88.16.035. WSR 07-17-148, § 363-116-082, filed 8/21/07, effective 9/21/07. Statutory Authority: Chapter 88.16 RCW and 2005 c 26. WSR 05-18-021, § 363-116-082, filed 8/29/05, effective 10/1/05. Statutory Authority: RCW 88.16.105 and 88.16.035. WSR 05-04-028, § 363-116-082, filed 1/26/05, effective 2/26/05. Statutory Authority: RCW 88.16.105. WSR 99-08-003, § 363-116-082, filed 3/25/99, effective 4/25/99; WSR 97-14-032, § 363-116-082, filed 6/25/97, effective 7/26/97. WSR 97-08-042, recodified as § 363-116-082, filed 3/28/97, effective 3/28/97. Statutory Authority: RCW 88.16.035 and 88.16.105. WSR 93-09-016, § 296-116-082, filed 4/14/93, effective 5/15/93. Statutory Authority: RCW 88.16.105. WSR 92-24-056, § 296-116-082, filed 11/30/92, effective 12/31/92; WSR 92-08-051, § 296-

116-082, filed 3/26/92, effective 4/26/92; WSR 89-18-063 (Order 89-6, Resolution No. 89-6), § 296-116-082, filed 9/1/89, effective 10/2/89; WSR 89-11-060 (Order 89-5, Resolution No. 89-5), § 296-116-082, filed 5/18/89. Statutory Authority: RCW 88.16.035. WSR 80-03-081 (Order 79-6, Resolution No. 79-6), § 296-116-082, filed 3/4/80.]





STATE OF WASHINGTON  
**BOARD OF PILOTAGE COMMISSIONERS**

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

**Meeting Minutes – Pilot Safety Committee (PSC)**

May 3, 2022, 1 pm to 3 pm

**Attendees:** John Scragg (PSP), Andrew Drennen (BPC), Sheri Tonn (BPC), Jaimie Bever (BPC), Ivan Carlson (PSP), Charlie Costanzo (PSP), Scott Anacker (PSP), Mike Folkers (PGH), Jason Hamilton (BPC), Mike Moore (PMSA), Bettina Maki (BPC)

**Regrets:** Eleanor Kirtley (BPC)

**1. Review of Minutes of previous meeting on 03/29/2022**

The minutes were approved with a small clarification about maximum assignment duration for multiple harbor shifts and other instances of multiple assignments.

**2. Data about bulkier assignments**

Bettina shared two charts exploring data about bulkier assignments departing Tacoma before and after the change requiring two pilots for loaded bulkiers outbound from Tacoma *at night*. This was preliminary analysis using invoice data, not dispatch data, and therefore did not show entire assignment duration. Nonetheless, it did appear that outbound bulkier departure times had moved to mostly mid-day, therefore very few were classified as night assignments, and the second-pilot requirement did not apply.

Ivan Carlson explained that PSP dispatchers are encouraging call time of 0500 to 1300 for bulkiers departing Tacoma, though some bulkiers have tide-dependent schedules that cannot be shifted to those hours. He noted there have been 16 bulkiers that have needed a second pilot since the requirement went into effect in October 2021.

One of the charts included all vessel types, and Mike Moore asked about container ships with long assignment times. Ivan and Scott Anacker briefly discussed delay issues among other vessel types.

Ivan re-emphasized that it would be better to use dispatch data to understand the whole picture. John Scragg said that nonetheless the charts did show the long outbound bulkier assignments moving away from night assignments, which is a good development for fatigue management.

### **3. BPC Safety Bulletin on Retrieval Line Rigging**

The committee reviewed the draft safety bulletin regarding pilot ladder retrieval line rigging, and made some edits for clarity. They agreed the bulletin was ready to be included in the packet for the next Board meeting, to be approved for distribution to shipping agents and others as needed.

### **4. Pilot Ladder Forms**

Seventeen pilot ladder forms were available for review. Scott Anacker answered questions about the reports and drew the committee's attention to some particularly challenging issues.

Scott also shared some of the pilot ladder discussion from the West Coast Pilots Conference. PSP is experiencing good success with Jotform (online platform for html forms) and encourages other pilot associations to adopt similar technology to replace methods like PDF forms and/or scanned paper documents, to increase ease-of-use in reporting. Ultimately the pilot associations want to be able to efficiently exchange reports in order to leverage a shared knowledge base. Scott reported that all pilot associations seem to have the same challenge of less than 100% participation in reporting efforts. PSP wants to share report data submitted to date with their entire group, and hopefully help everyone see the benefits of reporting.

PSP will be meeting with USCG to discuss ladder safety and ladder reporting efforts, and pilots in Astoria are making similar outreach efforts. Andrew Drennan asked if it would be helpful to reach out to the classification societies and offered to share contacts in order to facilitate this.

### **5. Rest Rule Exceptions**

Grays Harbor had no rest rule exceptions. (It was initially thought that Grays Harbor had one rest rule exception, but Mike Folkers was able to clarify that a typo in the Grays Harbor assignment data had accidentally created the appearance of a long assignment where there was none.)

Puget Sound District rest exceptions were also reviewed. There were a few exceptions caused by the pilot boat leaving early. Some other exceptions resulted from Dispatch attempts to combine assignments a little too optimistically (as part of PSP efficiency measures). PSP at times is needing to make the decision to delay a vessel – usually briefly – in order to pair assignments (have one pilot do two assignments) to increase efficiency without violating rest rules. These efforts at efficiency reduce delays that would occur later, but any delay is unwelcome and unfortunately can obscure the good-faith efforts PSP is making to do more with less.

### **6. COVID 19**

Ivan Carlson reported that PSP will be working with Dr. Ann Jarris of Discovery Health MD to update COVID protocols as necessary as the pandemic continues to change around us.

### **7. Wrap-up/Next Steps/Next Meeting**

The next meeting is to be scheduled for early/mid July. The committee adjourned at 2:15PM.