



June 18, 2024

Ms. Jaimie Bever
Executive Director
Washington State Board of Pilotage Commissioners
2901 Third Ave Suite 500
Seattle, WA 98121
VIA Email Jaimie.Bever@wsdot.wa.gov

Re: Party of Interest WAC 363-116-065

Ms. Bever:

This letter is to identify Puget Sound pilots (PSP) as a Party of Interest in the Board's deliberations to set the number of pilots pursuant to WAC 363-116-065. As the organization whose members pilot vessels in this district, we feel that we are uniquely qualified to participate in this process.

We have been active participants in discussions in recent months regarding the Target Assignment Level. Our members are directly responsible for the safe movement of vessels and are very interested in making sure that the number of pilots set by the board will promote safety and efficiency and protect against fatigue caused by excessive call backs.

To this end, it is important that the board implements the Pilot Safety Committee's recommendation of an on-watch TAL of 123 per ship moving pilot and apply this TAL to 95% of the trailing 12 months of assignments. This is essential to move us closer to the safer and more sustainable practice of having only 5% of assignments being done by off duty pilots.

We are also hopeful that doing this will reduce the need for excessive numbers of call back jobs, reduce ship delays and reduce accumulated fatigue caused by these excessive call backs. It can also serve as a model for setting the number of pilots in the future in what will hopefully be a streamlined process under WAC 363-116-065.

PUGET SOUND PILOTS

By Ivan C. Carlson, President