

Exh. MM-65
Docket TP-220513
Witness: Michael Moore

**BEFORE THE STATE OF WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION**

WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION,

Complainant,

v.

PUGET SOUND PILOTS,

Respondent.

Docket No. TP-220513

**EXHIBIT TO CROSS-ANSWERING TESTIMONY OF
Captain Michael Moore
ON BEHALF OF
PACIFIC MERCHANT SHIPPING ASSOCIATION**

**PSP Submission to BPC on the Number of Pilots to be set under
WAC 363-116-065 (Feb. 2015)**

MARCH 3, 2023



Submission of PSP on the Number of Pilots to be set under WAC 363-116-065

February 19, 2015 Pilot Commission Meeting

Given the recent reduction in the number of pilotage assignments and the other factors listed in the above referenced WAC, Puget Sound Pilots respectfully requests that the Board reduce the number of authorized pilot licenses to 53 at its February 19, 2014 meeting. The last 12 months have seen 7,553 assignments which indicates 52.1 watch standing pilots at the Target Assignment Level. Adding the President brings the number of licenses to 54.

The Pilotage Act amendments in 2004 for the first time required that the board actually set the number of pilots. In response, the board enacted WAC 363-116-065 enumerating some of the factors to be considered. They include¹:

1. Safety of persons, vessels, property and the environment;
2. Importance of maritime commerce balanced by the hazards of navigation;
3. Maritime industrial trends such as:
 - a. Fluctuations in number of calls;
 - b. Types of assignments;
 - c. Size of vessels;
 - d. Cyclical nature of traffic and the current trends;
 - e. Minimization of shipping delays.
4. Workload, assignment preparation and rest needs;
5. Trends in size of piloted vessels;
6. Extent of injury and illness;
7. Administrative responsibilities, continuing education and training requirements;
and
8. Surface transportation and travel time.

The Board set a Target Assignment Level (TAL) at 145 and the number of pilots at 54 at its April 2010 meeting after months of consideration. Since that time, the number of pilots has fluctuated with ship traffic. Since reaching its peak of 55, it was last changed in November, 2014 when it was reduced to 54 pilots.

¹ A copy of the WAC is attached



Since 2013, the Board has been changing the number of pilots on a more frequent basis than in earlier years. The board has more closely applied the TAL to the number of assignments. As a result, the workload in 2014 was closer to the TAL than it has been since 2003. Pilots in 2014 only fell 85 assignments short of being exactly on the TAL – one half of a pilot. Here is a history of the data since 2003:

	Assignments	Change from Prior Year	Number of Licenses Indicated by SAL/TAL	Actual Number of licenses (Including President)	Assignments per watch standing pilot	Number of Jobs worked in Excess of the SAL/TAL
2003	7,338		50.2	50.5	148.2	-38
2004	7,604	3.6%	52.0	50.8	152.7	184
2005	8,260	8.6%	56.4	50.9	165.5	825
2006	8,372	1.4%	57.2	52.8	161.6	654
2007	8,315	-0.7%	56.8	53.7	157.8	463
2008	8,173	-1.7%	55.9	54.2	153.6	246
2009	7,669	-6.2%	52.5	55.6	140.5	-466
2010	7,338	-4.3%	51.6	55.4	134.9	-550
2011	7,614	3.8%	53.5	52.6	147.6	132
2012	7,765	2.0%	54.6	51.9	152.6	385
2013	7,813	0.6%	54.9	53.1	150.0	259
2014	7,615	-2.5%	53.5	54.1	143.4	-85

Here is traffic for the past 10 years:

MONTHLY TRAFFIC VOLUME 2015														Diff. From Prior Year
	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC	TOTAL	
2005	661	604	656	579	723	734	725	770	766	714	657	671	8,260	
2006	674	656	658	654	728	787	752	795	751	684	567	666	8,372	1.36%
2007	682	643	680	653	717	754	777	735	701	678	666	629	8,315	-0.68%
2008	665	643	648	625	785	743	760	698	649	677	679	601	8,173	-1.71%
2009	667	557	660	592	679	671	703	702	638	662	602	536	7,669	-6.17%
2010	570	593	614	582	665	654	668	667	611	588	591	535	7,338	-4.32%
2011	611	568	615	564	668	689	749	716	624	588	588	634	7,614	3.76%
2012	630	571	596	604	656	745	728	721	660	629	599	626	7,765	1.98%
2013	659	578	621	559	662	679	715	705	657	680	644	652	7,813	0.59%
2014	639	583	623	630	671	690	663	685	597	638	592	604	7,615	-2.51%
2015	577													



PUGET SOUND PILOTS
Protecting Puget Sound Since 1935

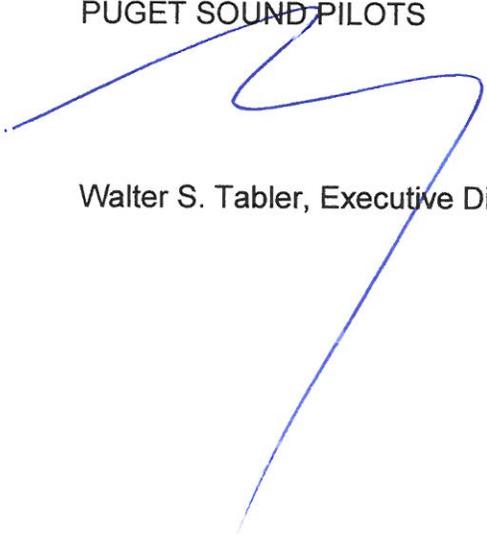
The breakdown of this traffic by ship type is shown on the attached traffic breakdowns for 2015 and January Of 2015. It appears that the decline in assignments that started last July, is continuing.

Part of this is the current disruption in the container trade which may or may not be temporary. However, there is also a marked decline in the tanker trade as well which promises to be more long term. Declines in the price of oil and the opening of more rail facilities at the refineries appears to be reducing this traffic.

The pilots ask that the Board continue this pattern of changing the number of licenses when the assignment levels indicate and again reduce the number of licenses by one, down to 53.

Respectfully Submitted,

PUGET SOUND PILOTS



Walter S. Tabler, Executive Director

WAC 363-116-065 Number of Pilots

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

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

(a) Policy of the state to ensure safety of persons, vessels, property and the environment by providing competent, efficient and regulated pilotage for vessels;

(b) The importance of the maritime industry to the state balanced by the potential hazards presented by the navigation of vessels requiring pilots;

(c) The lead time necessary to select and train new pilots;

(d) Regional maritime economic outlook, including without limitation: Current economic trends in the industry, fluctuations in the number of calls, the types of assignments, the size of vessels, the cyclical nature of the traffic and whether traffic is increasing or decreasing and the need to minimize shipping delays;

(e) Workload, assignment preparation and rest needs of pilots;

(f) Trends in size of piloted vessels;

(g) Time lost to injury and illness;

(h) Anticipated retirements;

(i) Administrative responsibilities, continuing education and training requirements consistent with the policy of chapter [88.16](#) RCW; and

(j) Surface transportation and travel time consumed in pilots getting to and from assignments.

**Puget Sound Pilots
Traffic Breakdown By Vessel Type**

Vessel / Year	Jobs		Diff # to 2013	Diff % to 2013	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
	Average	Total														
BULKER																
2012	85	1020			91	106	116	106	89	70	91	69	66	67	67	82
2013	76	915			95	82	91	52	64	58	51	64	48	111	104	95
2014	87	1052	137	15.00%	93	113	92	112	67	73	79	66	48	93	126	90
CAR CARRIER																
2012	45	544			43	44	45	43	45	53	46	52	39	43	44	47
2013	44	532			40	43	42	47	42	44	43	42	46	45	50	48
2014	43	524	-8	-1.50%	51	39	47	48	43	46	41	41	29	43	44	52
CONTAINER																
2012	234	2817			239	207	231	223	234	229	233	249	234	263	243	232
2013	241	2893			257	229	228	241	245	246	244	247	239	245	245	227
2014	233	2802	-91	-3.10%	252	212	239	242	257	227	240	236	218	242	206	231
GENERAL*																
2012	27	331			15	15	28	25	32	81	26	23	15	35	14	22
2013	26	317			11	16	18	28	28	24	38	33	39	26	13	43
2014	20	249	-68	-21.00%	17	8	18	18	28	28	14	30	19	33	11	25
PASSENGER																
2012	34	410			1	1	0	2	55	95	100	89	67	0	0	0
2013	31	377			1	5	0	0	59	89	80	84	59	0	0	0
2014	30	369	-8	-2.10%	1	1	0	0	61	85	82	85	54	0	0	0
RO-RO																
2012	20	248			17	21	25	19	21	21	20	22	24	17	20	21
2013	21	260			17	19	26	22	23	21	22	26	18	24	21	21
2014	21	262	2	0.77%	21	20	23	22	23	20	25	19	27	23	18	21
TANKER																
2012	188	2264			214	165	132	171	170	184	206	212	208	191	205	206
2013	200	2407			225	174	203	167	191	192	230	200	200	218	201	206
2014	187	2251	-156	-6.50%	195	177	198	179	185	202	177	201	197	191	176	173
Totals		7509	-192	-2.49%		570	617	621	664	681	658	678	592	625	581	592

*Includes Naval, Other, Reefer

**Puget Sound Pilots
 Traffic Breakdown By Vessel Type**

Vessel / Year	Jobs		Diff # to 2014	Diff % to 2014	Jan
	Average	Total			
BULKER					
2013	95	95			95
2014	93	93			93
2015	102	102	9	9.68%	102
CAR CARRIER					
2013	40	40			40
2014	51	51			51
2015	35	35	-16	-31.00%	35
CONTAINER					
2013	257	257			257
2014	252	252			252
2015	219	219	-33	-13.00%	219
GENERAL*					
2013	11	11			11
2014	17	17			17
2015	27	27	10	58.80%	27
PASSENGER					
2013	1	1			1
2014	1	1			1
2015	1	1			1
RO-RO					
2013	17	17			17
2014	21	21			21
2015	18	18	-3	-14.00%	18
TANKER					
2013	225	225			225
2014	195	195			195
2015	164	164	-31	-16.00%	164
Totals		566	-64	**,**%*	

*Includes Naval, Other, Reefer