

April 8, 2026

Chair Sheri Tonn  
Washington State Board of Pilotage Commissioners  
2901 Third Ave., Ste. 500  
Seattle, WA 98121

Re: Number of Pilots

Dear Chair Tonn and Commissioners:

We submit these comments for your consideration. It is important to state up front that PMSA continues to be concerned about the number of callbacks and delays incurred when the number of scheduled on-watch pilots significantly exceeds the average number of daily assignments. We note the timing of this BPC process and decision unfortunately coincides with the UTC rate case where one of the factors in the mix is the number of pilots. We fully support the separation of duties between BPC and UTC but also recognize the nexus on this issue and the potential to influence a rate decision. For the purposes of this letter, we focus on workload realities and data leading up to the August 2024 BPC analysis and decision compared to the significantly reduced workload realities at present.

I was unable to participate in the BPC meeting last month but have since reviewed meeting materials that include the staff recommendation to maintain the number of authorized licenses at 60. We appreciate the presentation of data that provides relevant insight to assignment trends. I realize the BPC chose to use the trailing 24 months data but would encourage a continuation of also tracking trailing 12 months which has more nexus to current pilotage demand.

**TAL On Watch, Off Watch – Both Matter**

PMSA has over the years provided comprehensive comments regarding the setting of the number of pilots utilizing data primarily sourced from PSP and BPC documents. Our efforts included submittals and comments leading up to and during the August 2024 BPC decision to set the on-watch TAL at 123 with off-watch or callbacks of up to 5% or 6 assignments for a total of up to 129 per pilot. The differential between 123 and 129 represents nearly 3 pilots (currently  $6 * 55$  working pilots = 330 assignments). We request that BPC avoid solely focusing on the on-watch TAL. PSP and BPC Staff have documented calculations using the formula of: Trailing 12 months assignments \* 0.95 with the result divided by 123 so this approach of considering the 5% off watch has relevancy as there will be some level of callbacks in the mix going forward.

**Current Workload Compared to Workload Prior to the August 2024 BPC TAL Decision**

- Trailing 12 months through February is 640 fewer assignments than it was in August of 2024
  - This is equivalent to 5 fewer pilots
- Trailing 24 months through February is 186 fewer assignments than it was in August of 2024
  - This is equivalent to 1.5 fewer pilots
- If consistent with the August 2024 BPC decision, these workload reduction realities would logically lead to a number of pilots reduction range of between 1.5 and 5 pilots
- But in addition to these realities there are projected further decreases based on announcements summarized in the next section.

### **Forecast Traffic by Trend Analysis and Modified by Announcements**

The vessel traffic forecast shows a reduction in ship calls and therefore assignments. Calendar year 2025 had 2,434 ship calls and 7,036 assignments. We applied a multiple year trend analysis of arrivals in addition to using a multiplier of arrivals to project assignments (arrivals, departures, shifts, second pilots, cancellations). Using this methodology, PMSA forecasted a reduction of assignments to 6,972 in 2026 – see the attached analysis to walk through these calculations.

In addition, there are announcements regarding services including cruise and container services in addition to the ATB service reduction already reported by PSP and finally some potential adjustment to the LNG refueling operation to be conducted by Seaspan. In total, these announcement would decrease assignments by 143 which is equivalent to the reduction of just over one more pilot. Here is a summary of the announcements:

- Cruise ship calls will increase – PSP forecasted 60 additional assignments
- Evergreen HTW service shifting out of PNW to Oakland and LA (loss of up to 80 assignments)
  - The most recent service in this string involved a 15K plus TEU class vessel which required two pilot inbound and two pilots outbound. If operated weekly that would generate 208 assignments annually.
  - Evergreen stated on April 7<sup>th</sup> (yesterday) that there are no plans at this time to resume service later this year
  - NWSA noted that this service operated up to 5 months each year. With the largest class vessel that was being used, that would be a loss of up to 80 assignments (2 in, 2 out, 20 weeks)
- UWL and ESL announced that the Sun Chief Express service, connecting Vietnam and South China to Seattle concluded operations on March 20, 2026. This means the loss of the fortnight service and a decrease of 52 assignments on an annualized basis.
  - Earlier announcement of transitioning from fortnight to weekly service was reversed to a total shut down of the service based on market conditions.
- Voids outpacing Ad Hoc calls by more than 3 to 1 (potential loss of 100+ assignments)
  - NWSA indicates a void to ad hoc sailings comparison of 38 to 11 or more than triple. If this volume/trend continues this would project a loss of approximately 50 port calls compared to 2025 (estimated reduction of 100 assignments unless 2 pilots required which would further decrease assignments)
- LNG Refueling (addition of 29 to 39 assignments)
  - Seaspan plans 13 refueling operations initially weekly service including a transit to anchor so 3 assignments per evolution
  - Seaspan stated they would run through the refueling operation a couple of times and then look to reduce it to bi-weekly and perhaps schedule arrival to Elliott Bay timed with the arrival of the cruise ship to avoid the stay at anchorage.

Lastly, there are container cargo volume reductions which need to stabilize or start growing if we are to avoid further loss of container calls through service changes or management via void sailings. One need only looks at TEU volume reports put out by NWSA, PMSA and others to see the trend particularly in the PNW.

The reduction in pilot assignments since the August 2024 BPC decision is significant. The magnitude of reduction reasonably leads to the need to reduce the number of pilots if being consistent with the 2024 decision. Using a longer time period like trailing 24 months will produce a higher number of assignments given the peak year of 2024 but with each succeeding month, a high assignment month in 2024 will be replaced by a lower assignment month in 2026. The BPC can reduce or increase the

number of pilot licenses as frequently as it sees fit and in fact did so just 10 years ago with the number of pilots adjusted a couple of times in a few short months. There is every opportunity for the BPC to adjust to the traffic conditions to right size the pilot corps as it sees appropriate. We urge the BPC to do the logical thing and right size the number of pilot licenses to the current realities and pilotage demand.

Sincerely,



Captain Mike Moore  
Vice President

Encl: PMSA 2026 Vessel and Assignment Projections