



April 8, 2026

Jaime Bever
Executive Director
Washington State Board of Pilotage Commissioners
2901 Third Ave. Ste 500
Seattle, WA 98121

Dear Director Bever:

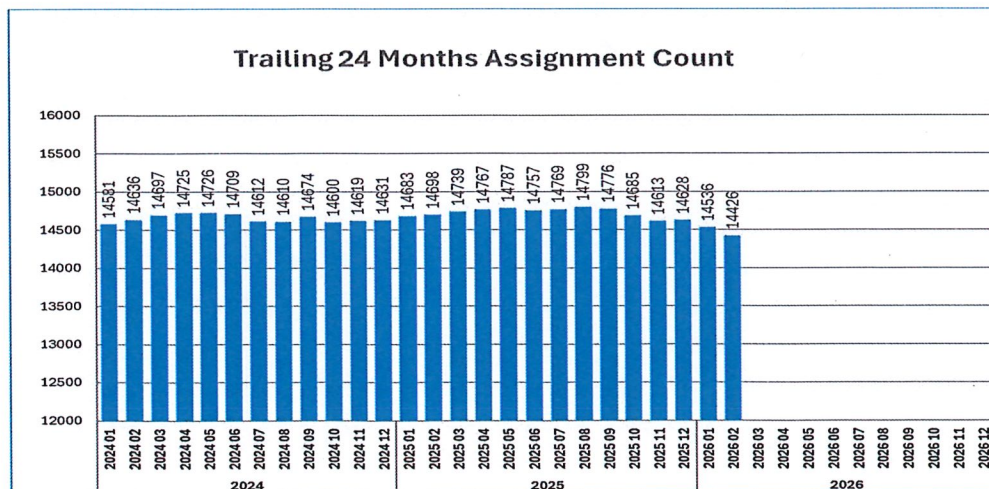
This document is provided as requested in the Instructions for Stakeholders adopted February 19, 2026. Puget Sound Pilots (PSP) provides this information to assist the Board of Pilotage Commissioners (BPC) in its deliberations to establish the authorized number of pilots for the coming two-year period.

To summarize PSP's position, we support the BPC staff recommendation to authorize 60 licensed pilots in the Puget Sound Pilotage District. We arrived at this number by adjusting the trailing 24-month traffic through February 2026 to account for known changes, dividing by the TAL, and adding two pilots—one for the President and one for those not fit for duty.

Background

During the February 19, 2026, meeting, the BPC approved utilizing the trailing 24 months of assignments. Following this, the March 19 meeting included a staff presentation recommending pilot numbers based on the June 2024 unanimous vote of 123 TAL. To ensure consistency, PSP utilized the BPC-calculated 24-month average (March 1, 2024 – Feb 28, 2026) published on their website.

Below is a chart produced by the BPC showing the trailing 24 months of traffic, with the most recent 24 months at 14,426 assignments:



Known and Verified Changes in Traffic

Pilot staffing is determined by taking the trailing 24 months of traffic, adjusted for known, verifiable changes in the coming year. TAL is applied to this projected traffic by dividing total assignments by 123, plus one position for the President and one for a pilot not fit for duty.

There is currently a high degree of uncertainty in the broader economic environment, particularly within the shipping industry. Recent policy changes, legal developments, and market fluctuations have made forward planning more challenging. Given these conditions, it is prudent to focus on changes that can be clearly supported and verified, rather than relying on assumptions about future developments.

Here is what can be verified for the coming year:

Attached is an Excel spreadsheet detailing the changes outlined in the Future Traffic table. The tabs within the spreadsheet are described below:

1. Calculator – Calculates the number of authorized pilots based on the trailing 24 months halved for a 12-month period (7213 assignments).
2. Cruise Trailing 24 - Shows the trailing 24 months of cruise traffic (1156 jobs) halved for a 12-month period (578).
3. POS 2026 Cruise Schedule – Shows the assignments for the 2026 cruise schedule (660). This represents 82 more assignments than Cruise Trailing 24 halved for 12-month period (578).
4. Seaspan LNG – Shows the number of anticipated LNG bunkering assignments (39).
5. Sun Chief – Shows the number of lost assignments with the loss of the Sun Chief Express service (52).
6. Evergreen Ad Hoc HTW Trailing 24 - Shows the trailing 24 months of the Evergreen Ad Hoc HTW service halved for a 12-month period (56).
7. ATB Sea Reliance – Shows the trailing 24 months halved for 12-month period (127).

FUTURE TRAFFIC	
Cruise	82
Seaspan LNG Bunkers	39
Sun Chief Express T-18 Seattle	-52
2025 Evergreen HTW	-56
ATB Sea Reliance	-127
Total Confirmed Future Traffic	-114

Calculation of Number of Pilots

The remaining steps are straightforward. The trailing 24-month traffic figure is adjusted to reflect verified changes, divided by 123, and then increased by two positions—one for the President and one for a pilot not fit for duty.

OUTPUTS	
Trailing 24 Month Annual Average	7,213.0
Total Assignments (with Future)	7,099.0
Base Pilots (before +2)	57.7
Final Pilots (after +2)	59.7
Rounded Final Pilots	60.0

Conclusion

PSP agrees with staff analysis of maintaining 60 pilots. While the traffic calculation results in a lower assignment count than the trailing 24-month average, it is not a large enough reduction to change the number of authorized pilots.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Scott Brewen', is written above the printed name.

Scott Brewen, Executive Director

Encl.