

March 2026 BPC Staff Recommendation for Puget Sound Pilotage District Authorized Number of Pilots: 60 Licensed Pilots

INTRODUCTION: PREVIOUS RECOMMENDATION

In August 2024 BPC staff recommended the authorized number of pilots for the Puget Sound Pilotage District be set at 60, and the Board agreed. ¹

The number 60 was recommended based on the following parameters:

- TAL of 123 assignments per pilot per year ²
- Desire to limit off watch assignments to 5% (after many years of excessive callbacks due to pilot shortage) because off-watch time is an essential component of fatigue management ³
- 60 licensed pilots = 1 pilot President, 1 pilot NFFD (average), and 58 pilots moving ships ⁴
- 58 pilots moving ships x 100% TAL of 123 = 7134 assignments
58 pilots moving ships x 105% TAL of 123 = 7491 assignments

In other words, 58 pilots moving ships = estimated assignment capacity of 7134 to 7491 per year (100% to 105% of TAL) plus 1 pilot President, plus 1 pilot NFFD = 60 licenses.

The trailing 12-month assignment count peaked at 7687 in August 2024, the same month this recommendation was made, but that peak number was **not** the reason for the recommendation. Again, the number 60 was recommended because subtracting 1 for President and 1 for NFFD leaves 58 pilots moving ships, with estimated assignment capacity of 7134 to 7491 per year (100% to 105% of TAL). This was explained on page 5 of the Staff Recommendation document from 2024. ⁵

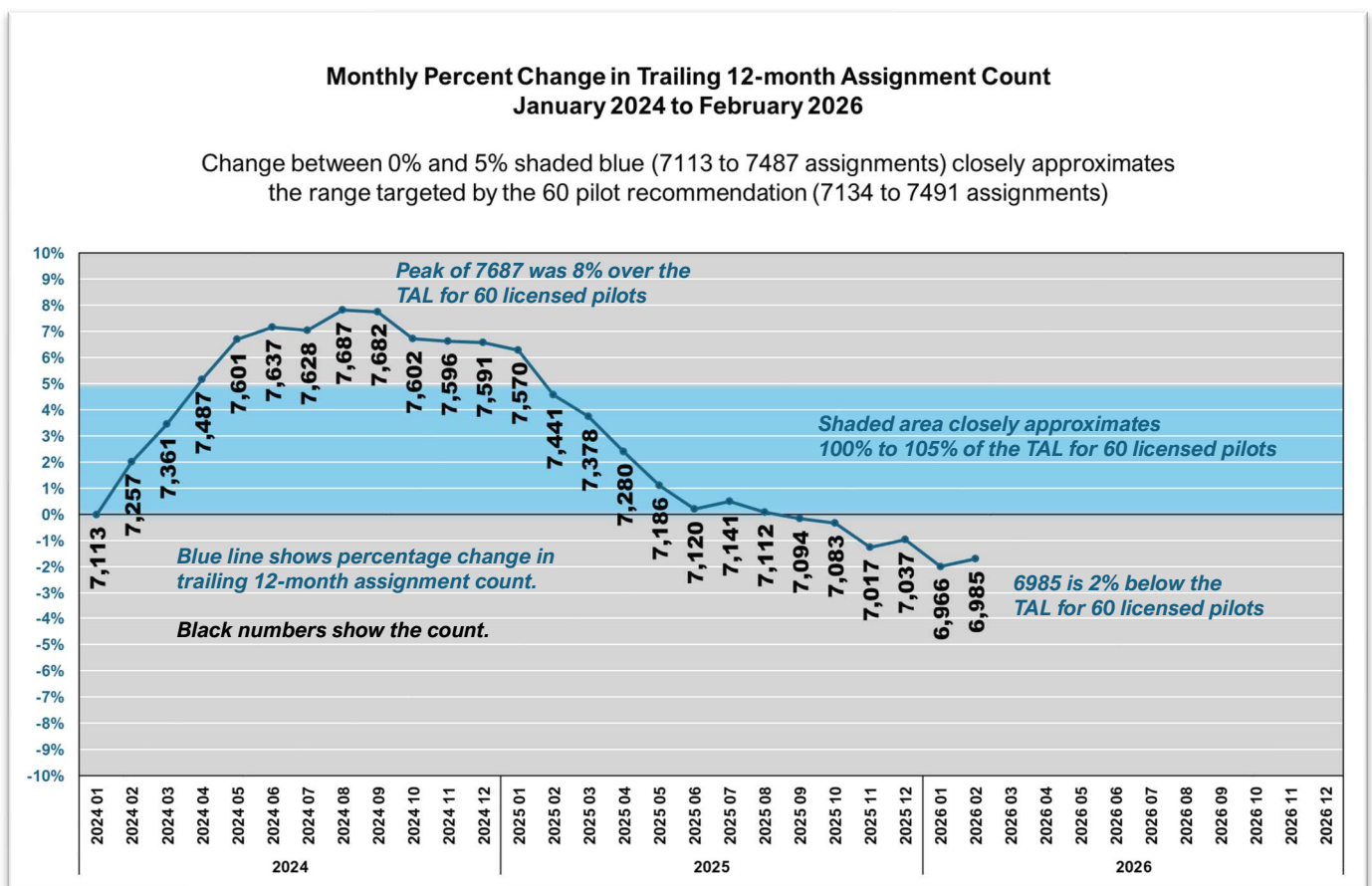
The range of 100% to 105% of TAL is important because BPC is not seeking to **require** 5% callbacks, but rather to **limit** callbacks to 5%.

HOW DID THE 2024 RECOMMENDATION TURN OUT?

The chart below shows the percentage change in trailing 12-month assignment count starting January 2024. The range targeted in the recommendation for 60 licensed pilots (7134 to 7491) is very close to the 0% to 5% change in the trailing 12-month assignment count (7113 to 7487).

The chart shows that the assignment range targeted in the 2024 recommendation is far below the assignment peak (7687 in August 2024), while the current trailing 12-month assignment count (6985 in February 2026) is only 2% below the TAL for 60 pilots (6985 is 98% of 7134).

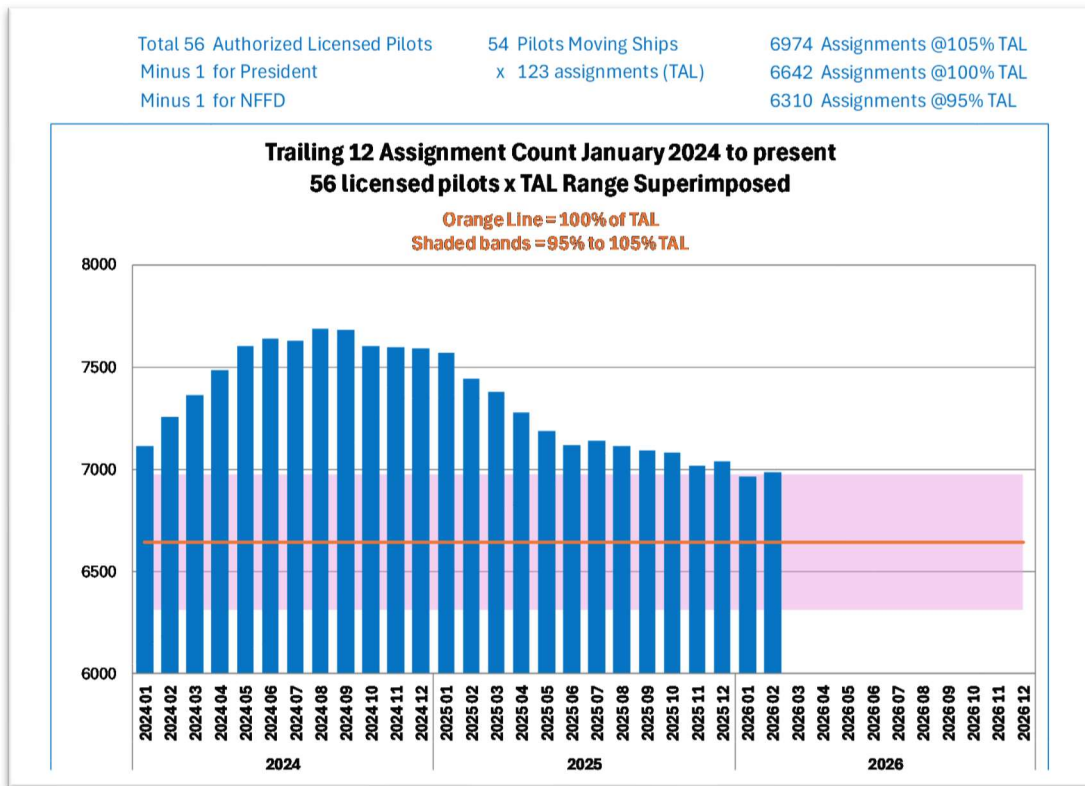
While the August 2024 trailing 12-month assignment counts exceeded the TAL for 60 licensed pilots by 8%, the following year the August 2025 trailing 12-month count was nearly 100% of the TAL for 60 licensed pilots (7112 is 99.7% of 7134).



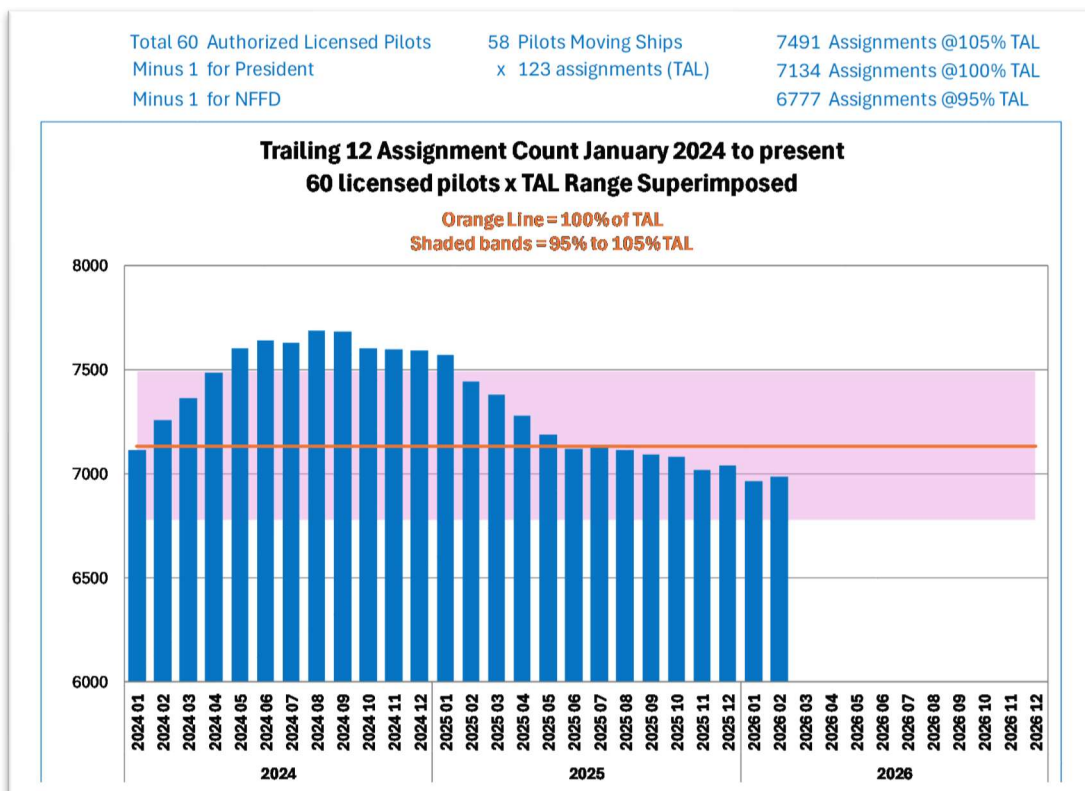
During the 18 months since the recommendation for 60 pilots was made in August 2024:

- trailing 12-month assignment count has ranged between 6966 (min) and 7687 (max).
- number of licensed pilots reached 57 for 5 months but otherwise has been 55-56.
- callback percentage has averaged 8.7% each month as the pilot shortage improves (callbacks averaged 14.5% each month January 2019 through July 2024).

The Board set the authorized number of pilots at 60, meaning that is the maximum number of pilots that BPC may license. However, the current number of licensed pilots is 56 despite the authorized number being higher than that. These charts compare the TAL for 56 vs 60 pilots.

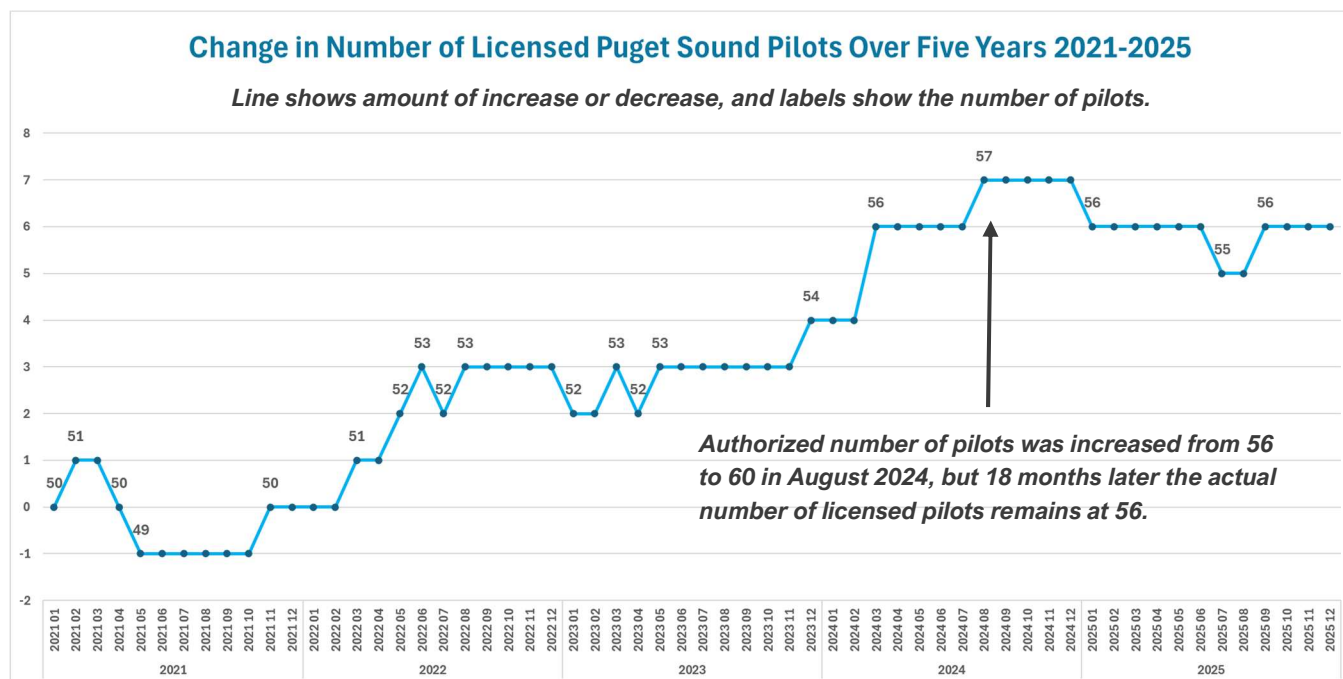


56 licensed pilots at 100% of the TAL (orange line) must work a MINIMUM of 5% callbacks (pink shaded area above orange line) at all times to keep up with ship moves.



60 licensed pilots at 100% of the TAL (orange line) are able to keep up with ship moves while for the most part limiting callbacks to 5% or less.

Between retirements⁷ and lengthy training process, increasing the number of licensed pilots takes time. Chart below shows the timeline of changes to the actual number of licensed pilots (not the authorized number). Over a five-year period the total number of licensed pilots has increased by just 6.



CURRENT CONDITIONS AND DATA CONSIDERED FOR 2026 RECOMMENDATION

The most recent 24 months of pilotage assignment data include a peak in summer of 2024 at 108% of TAL for 60 pilots, followed by a decrease to 100% of TAL for 60 pilots a year later in summer of 2025. The decrease from the peak should be seen as a return to a level that is appropriate for 60 pilots, rather than a reason to lower the authorized number of pilots.

The previous recommendation and current recommendation are both based on an assignment range of 7134 to 7491 which is 100% to 105% of the TAL for 60 pilots. Meanwhile, the actual number of pilots is currently 56 and is not likely to increase quickly given the significant number of pilots nearing retirement age. **100% of the TAL for 56 pilots is 6642.**

Known vessel traffic changes⁸ in 2026 include a 14% busier cruise season than the previous two years (82 additional ship moves) and 13 LNG bunkerings (3 assignments each bunkering for a total of 39 new assignments). In addition, NWSA reports the Sun Chief Express service is expanding from every 2 weeks to every 1 week (52 additional ship moves). When the cancellation of Evergreen's HTW service is factored in (56 fewer ship moves based on the previous two years of data for this ad hoc service), there is a net increase of 117 assignments.

RESPONSE TO PMSA LETTER OF FEBRUARY 11, 2026

PMSA is requesting⁹ the authorized number of pilots be reduced from 60 to 55.

The reason given for the request is that the trailing 12-month assignment count has decreased 8.6% from the time of the 2024 decision to set the number of authorized pilots at 60, and so the authorized number of pilots should be reduced by 8.6%, which would be 5 pilots. BPC staff are not in favor of this request for the following reasons:

- The recommendation to set the authorized number of pilots at 60 was not based on peak assignment counts of summer 2024 as stated in the request. Rather, the recommendation was based on a forecasted assignment range of 7134 to 7491 (100% to 105% of the TAL for 60 licensed pilots).
- The calculation PMSA is using to determine the number of pilots assumes TAL + 5% instead of TAL, and does not factor in 1 NFFD pilot.

CLARIFICATION OF CALCULATIONS

There seem to be two persistent misunderstandings that can cause incorrect and/or inconsistent results when calculating number of pilots.

- President and NFFD pilot

In addition to pilots moving ships, calculations must account for 2 pilots not moving ships – 1 pilot president and 1 NFFD pilot (average). The NFFD pilot is counted separately from pilots moving ships because the TAL was calculated based on *available* pilots, and pilots unavailable due to NFFD status were excluded from the analysis. In other words, the TAL is calculated for 1 pilot working a full year and does not consider NFFD pilots and so an NFFD pilot “placeholder” is added along with the president. Calculations that do not include 1 NFFD pilot are not complete.

- TAL (target assignment level) and callbacks

The TAL is 123 assignments per pilot per year. One can work forwards or backwards to calculate the number of pilots needed to move a given number of ships, or the number of ships that can be moved by a given number of pilots.

Our goal is to *limit* callbacks to 5%, not *require* 5% callbacks. It is important to not include callbacks in the TAL by default (doing that effectively increases the TAL to 129) and instead consider them as additional assignments above and beyond the TAL. This establishes an assignment forecast range instead of a single-number forecast.

It does not work to first reduce the assignment forecast by 5% and then divide by TAL of 123. That results in an effective TAL of 129 -- in other words the 5% callbacks are included by default.

Examples:

CORRECT: 7134 assignments divided by TAL of 123 = 58 pilots moving ships,
and 7134 can range as high as 7491 with 5% callbacks added,

INCORRECT: 7134 assignments x 0.95 = 6777, divided by TAL of 123 = 55.1 pilots moving ships,
= 129.5 assignments per pilot (assumes 5% callbacks, increasing the TAL to 129.5)

CONCLUSION & STAFF RECOMMENDATION

BPC staff suggest following a consistent and data-based process for evaluating the authorized number of pilots on a routine basis, incorporating the following elements:

- The TAL for pilots moving ships is 123 assignments per pilot per year.
- It is preferred that off-watch assignments (callbacks) not exceed 5% of the TAL because uninterrupted off-watch time is an essential component of fatigue management.
- Two additional pilots not moving ships (1 pilot President and 1 pilot NFFD) need to be included in the total number of authorized pilots.
- When considering the number of pilots required it is helpful to consider the range of assignments between 100% and 105% of TAL to account for normal fluctuations and imperfect forecasting, rather than a single number based on TAL + 5% callbacks

By using a standard approach with parameters that are well documented and clearly understood by all, it is hoped that reconsideration of the authorized number of pilots will become a simple and effective routine process.

BPC staff have used this process, which they also used in 2024, to formulate the current recommendation.

The staff recommendation is to keep the authorized number of pilots at 60 based on a forecasted assignment range of 7134 to 7491 (100% to 105% of the TAL for 58 pilots moving ships, plus 1 pilot president and 1 pilot NFFD (average).

NOTES:

1. The Board agreed, but requested the Pilot Safety Committee (PSC) evaluate the PSP comp day system for appropriate guardrails and risk mitigation. There were four PSC meetings in 2025 where the main topic was PSP comp days. Meeting notes are provided to commissioners once approved by the committee.
2. TAL was set by the PSC during four meetings in early 2024.
3. Fatigue management recommendations from Dr. Czeisler relating to consecutive days of work are listed below:
 - a. Weekly work limit of 60 hours in a running 7 day interval
 - b. Weekly rest of minimum 24 consecutive hrs every 7 days,
34 hrs every 7 days if working more than 7 days.
 - c. Maximum days on duty should not exceed 15.
Every 7 day interval in a 15 day stretch requires 34 hrs rest period
 - d. Monthly rest of 60 consecutive hrs required within every 30-day period.
Must include 3 nights between 0000-0600..
4. More detailed explanation of TAL analysis and need to add 1 pilot president and 1 NFFD pilot to pilots moving ships can be found under "Clarification of Calculations" on page 5.
5. The 2024 Staff Recommendation document is available [here](#) (on BPC web site).
6. The idea of using assignment ranges of 95% to 105% of TAL to determine number of pilots was suggested by Commissioner Farrel in January 2026 and the table pictured below was provided but did not include 1 pilot president and 1 NFFD pilot.
Staff updated the table to include the 2 missing pilots, and it became the inspiration for the interactive chart provided to commissioners for the February 2026 board meeting and pictured on page 3 of this document.

	A	B	C	D	E	F	G
2							
3		Number of Pilots	TAL	Pro Forma Capacity Minus 5%	Pro Forma Assignment Capacity	Pro Forma Capacity Plus 5%	
4		56	123	6,544	6,888	7,232	
5		57	123	6,660	7,011	7,362	
6		58	123	6,777	7,134	7,491	
7		59	123	6,894	7,257	7,620	
8		60	123	7,011	7,380	7,749	

Note that staff recommendation uses assignment ranges of 100% to 105% of TAL.)

7. The chart below showing a significant number pilots nearing typical retirement age was shared by staff at the January 2026 board meeting as part of a presentation about expected retirements and licensures. The presentation is was included in commissioners' packets.



8. Information about known vessel traffic changes provided by Puget Sound Pilots from the following sources:
- <https://www.portseattle.org/maritime/cruise>
 - <https://container-news.com/ocean-alliance-removes-tacoma-from-htw-transpacific-service/>
 - <https://www.nwseaportalliance.com/newsroom/northwest-seaport-alliance-celebrates-expansion-sun-chief-express-service-weekly-sailings>
 - Email exchange with Seaspn LNG.
9. PMSA letter requesting reduction in authorized number of pilots available [here](#) (on BPC web site).