

**MEETING MINUTES**  
**STATE OF WASHINGTON ~ BOARD OF PILOTAGE COMMISSIONERS**  
**August 15, 2024**

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**REGULAR MEETING – Call to Order**

The Regular Meeting of the Board of Pilotage Commissioners was called to order at 10:00 a.m. by Chair Sheri Tonn in the Commission Room of the Port of Grays Harbor, 111 S. Wooding St., Aberdeen, WA and online via Microsoft Teams. In her opening remarks, Chair Tonn thanked the Port of Grays Harbor for their hospitality in hosting the Board and the public.

**Present in Grays Harbor:**

Chair: Sheri Tonn

Vice Chair: Eleanor Kirtley (Marine Environment)

Commissioners: Sandy Bendixen (Pilot), Timothy J. Farrell (Public), Mike Anthony (Pilot), Jason Hamilton (Public), Andrew Drennen (U.S. Shipping), Nhi Irwin (Ecology)

Administration: Jaimie Bever, Bettina Maki, Jolene Hamel

Port of Grays Harbor: Mike Folkers, Ryan Leo

Puget Sound Pilots: Ivan Carlson, Severin Knutsen, John Scragg

Pacific Merchant Shipping Association: Mike Moore

Public: Gary Nelson

**Present via Teams:**

Commissioners: Richard Firth (Foreign Shipping)

BPC Assistant Attorney General: Albert Wang

Pacific Merchant Shipping Association: Jordan Royer

The Northwest Seaport Alliance: Lindsay Wolpa

Public: Ann LaRue, Ryan Campbell, Darius Rogers, Jake Spink

Puget Sound Pilots: Eric Klapperich, Peter Mann, Matt Cassee, Robert Ekermann, Joe Semler,

Nick Moore, Ken Grieser, Adam Seamans

USCG: Kira Moody, Genaro Villegas

Northwest Marine Trade Association: Jay Jennings

**BPC Staff Report.**

- BPC Executive Director Jaimie Bever echoed Chair Tonn's thanks to the Port of Grays Harbor and asked all in the room to be sure to project loudly for those on Teams.
- Jaimie also congratulated Jolene Hamel, Training Program Manager, on her upcoming 7-year anniversary with the BPC on September 1.
- Finally, she acknowledged that the BPC Pilotage Quarterly newsletter will be released prior to the next Board meeting.

**BPC Chair Report.**

- BPC Chair Sheri Tonn informed that both she and Executive Director Bever attended the UTC Pilotage Tariff Workshop last month on July 22.

**Activity Reports.** Mike Folkers representing the Port of Grays Harbor (PGH), Kira Moody and Genaro Villegas representing the United States Coast Guard (USCG), Ivan Carlson representing Puget Sound Pilots (PSP), Mike Moore representing Pacific Merchant Shipping Association (PMSA), and Lindsay Wolpa representing The Northwest Seaport Alliance (NWSA) offered current and projected statistical data as well as updates on current maritime issues and activities.

BPC Data Analyst Bettina Maki shared the pilotage activity dashboard and was available for questions.

PSP President Captain Ivan Carlson reported that last night he and Vice President Captain Eric Klapperich met with the president and vice president of B.C. Coast Pilots, who were sent to meet with PSP by Westridge Terminal, the new pipeline terminal in British Columbia, Canada. They were asking if PSP would resume cross-border traffic as they are anticipating about 70 additional arrivals per year southbound, which would mean over 200 additional assignments for PSP. Westridge and B.C. Coast Pilots, as well as PSP believe the safest route would be north of Patos Island. Captain Carlson reported that he had also received notice of a possible return of vessel traffic at Pierce County Terminal in November which is a 2-pilot job (2 in 2 out). That could also mean an additional 200 assignments per year for PSP.

B.C. Coast Pilots President Captain Jake Spink joined the meeting virtually to speak about the additional anticipated trips. Commissioner Bendixen inquired about the length of those anticipated trips from Westridge to which Captain Carlson replied 30-33 hours, which includes call time, travel to B.C., southbound transit while riding from Canada, the actual piloting, and then the required 10 hours rest. He added the current longest assignments are around 19 hours, 9 for assignment time and 10 hours rest.

Commissioner Drennen inquired if the anticipated 70 arrivals were under firm contract to which Captain Spink replied that it was an estimate based on conversations with TMX. Commissioner Drennen responded that it was early to make arrangements based on estimates and that it was an emerging market. He thought the number seemed high. Commissioner Hamilton asked about the timing of the possible increase. Captain Spink replied that it was already happening. Captain Carlson added that the increase started in May but has not yet ramped up to full operation.

### **NEW BUSINESS**

Chair Tonn advised that to accommodate the BPC Assistant Attorney General's Albert Wang's schedule, that the agenda would be reorganized.

### **Meeting Minutes.**

Motion: Kirtley/Hamilton – approve the July 18, 2024, revised Meeting Minutes as written after clarifying one line that helps to accurately reflect the conversation – Carried, with one abstention from Commissioner Farrell.

**Discussion Concerning Setting the Number of Pilots in the Puget Sound Pilotage District as Provided in WAC 363-116-065.** Chair Tonn introduced the number of pilots topic by providing an overview of the process to date. She explained that at the April 12 BPC meeting PSP, via then Executive Director Charlie Costanzo, submitted a letter to the BPC requesting the Board address the number of pilots and establish a Target Assignment Level (TAL). That request resulted in 2 motions at the meeting – to recognize receipt of letter and to assign the workload for TAL to the Pilot Safety Committee (PSC). Both motions passed. In May, the Board adopted and provided instructions to stakeholders on the process. It included a schedule, which has been met at every step along the way. Chair Tonn then read the parameters outlined in the instructions. The minutes from the 4 PSC meetings regarding the development of the TAL recommendation were provided to the Board at the June meeting where the PSC recommended an on-watch TAL of 123, which was adopted by the Board.

Chair Tonn then asked BPC AAG Albert Wang to give a briefing on the Board's responsibility in setting the number of pilots. Albert gave a quick legal background for those experiencing the process for the first time. Per RCW 88.16.35, setting the number of pilots is within the discretion and expertise of the Board. The legislature recognizes that it is not an expert body, so they designate expertise to Boards and Commissions. Albert mentioned the list of considerations in WAC 363-116-065 for setting the number of pilots and pointed to the term "may" as opposed to "shall". Per Albert, the items on the list are discretionary factors, there to guide but not required. Regarding expertise, the judicial standard of review that applies to the BPC consideration is called arbitrary and capricious review, which is commonly used in situations like this where the legislature is utilizing a Board's expertise. Because of that, the court will be deferential and respect the Board's expertise, unless shown that the agency had no justification for its acts. It means that even if a court were to disagree with the agency's action on the number of pilots, the court would still have to uphold the Board's determination. He added that this situation is seen a lot in highly technical determinations. If the Board has a solid reason behind its decision, it is unlikely to be found to be arbitrary and capricious.

Chair Tonn thanked Albert and added that at the July BPC meeting, she said there would be time for parties of interest comment, public comment, and that BPC Staff would prepare a recommendation for consideration at the August meeting. BPC Program Analyst Bettina Maki has been involved in looking at all the numbers and reviewing exactly what was submitted in the proposals and rebuttals. She has summarized and commented as well as developed a recommendation. Chair Tonn added that she had reviewed the recommendation document as the process unfolded. She then invited Bettina to speak about the recommendation.

Bettina explained that the staff recommendation was to increase the authorized number pilots from 56 to 60, which she saw as a conservative recommendation. The recommendation document laid out the main points of the different submittals in a table, with comments from BPC staff point of view. One thing she

noticed that didn't come up until reviewing the submittals was that the BPC intention to limit callbacks to 5% was being interpreted as essentially increasing the TAL from 123 to 129. She thought it made more sense to think of the callback percentage as providing a range of assumptions for planning and forecasting. Instead of planning to max out the callback percentage to meet the assignment forecast, the suggestion was to utilize the whole range from 0% to 5% callbacks and aim for the middle of the range (2.5% callbacks) rather than the top of the range. An assumption of 5% callbacks is likely to result in greater than 5% callbacks. She included two tables at the end of the document to explain that. She addressed the 13 recommendations by PMSA as well. She said many were inconsistent with the TAL analysis. She did not agree that efficiency requires one assignment per on-watch pilot per day. She had stumbled on a method for analyzing work and efficiency that considers three categories: direct effort (e.g. bridge time), indirect effort (e.g. tugs, training, transportation, rest), and operational needs (e.g. Not Fit for Duty) to understand staffing needs. Many recommendations were about increasing data gathering. BPC staff believe they already receive enough data, which is then passed on to PMSA. It was noted that data gathering is labor intensive, and that BPC staff is not interested in increasing the burden of data gathering on PSP to identify a hypothetical inefficiency. Bettina then explained the two tables at the end of the recommendation document. Table 1 considered various annual assignment forecasts based on different assumptions. She included the two forecasts from the submittals and generated additional examples herself to show that assignment forecasts based on past data require use of best judgement. In the bottom half of Table 1 she converted the different assignment forecasts into different numbers of pilots using the range of 0-5% callbacks. On the last page, Table 2, she did the calculations in reverse starting with the number of pilots and working backwards to the number of assignments using the range of 0-5% callbacks. It made sense to her to aim for the middle of the range. Regarding retirements, Bettina noted there will be 20 mandatory retirements between 2025-2033. While the 70th birthdays will occur between 2025-2033 the retirements will likely happen sooner, since about 80% of pilots retire around age 65-68. The average career span is 18 years. Her final point was regarding the argument being made that despite recent increases in number of pilots, there is still a similar number of callbacks. She pointed out that the assignment level has coincidentally increased at the same time the number or licensed pilots has increased. To see a significant reduction of callbacks will require an increase beyond 56. PSP has significantly reduced delays, however.

Commissioner Bendixen added that it also takes additional time for training and upgrading to unlimited license level. Commissioner Drennen responded that retirement was more of a training issue than a number of pilots issue. He also thanked Bettina for her great work. Chair Tonn was concerned with the number of successful candidates from last exam and how quickly the BPC will need another exam. She added that it is a lot of work, especially for staff and pilots to complete the process. She was disappointed that it will have to be done again so soon.

Commissioner Bendixen reminded everyone that increasing the number of pilots isn't a 20-year commitment. She thought that 60 would be conservative, considering the estimated assignment increase mentioned earlier in the meeting. Commissioner Drennen was hesitant to react to the TMX projection. He asked about the asterisk in BPC's staff document regarding PMSA's recommended number of pilots. Bettina responded that the PMSA submittal recommended 57 pilots but did not include an NFFD factor – PMSA was under the impression that the TAL included a NFFD factor, but that was not correct. She understood why it might be confusing. During the PSC work they tried to get down to a common denominator that didn't include NFFD to determine the TAL for a pilot working an entire year, with the idea that for various reasons a different NFFD factor might be assumed when determining the number of pilots. Because of that Bettina corrected the PMSA suggestion, noting it should include an additional pilot to cover the NFFD. Commissioner Drennen suggested that she should have conferred with PMSA first to which she agreed. Commissioner Kirtley thanked Bettina for what she called a remarkable analysis. She added that she had served on PSC and that the TAL work was valid. The BPC staff recommendation report indicates that it is a simple calculation. They just needed the sensitivity analysis of vessel traffic, which Bettina has provided. Jolene commented that at the end of the day it was not a "for" or "against" industry or pilots. It is about the current trainees, the 2024 candidates, and everybody the BPC is trying to attract and maintain. She cautioned the Board to think about the message being sent to anyone thinking about becoming a Washington state pilot. She added that any other company would see the need and hire; but PSP can only do that through BPC setting the Number of Pilots and the Exam process.

PMSA Vice President Captain Mike Moore commented that he appreciated the work but took issue with some of it. He wanted to make clear that PMSA never recommended 177 for a TAL. He pointed out that if looking at the PSP watch schedule submitted to the UTC, it shows 26.7 pilots scheduled for watch every day. This would be 20% more than number of assignments per day. He wondered why there was a pilot shortage issue. Were there that many spike days causing a stress to create shortages? Or were other things going on? He wondered how many delays callbacks caused by each task. Regarding Albert's comments about the Pilotage Act, he responded that the RCW uses the word "shall", while the WAC uses "may". He added that the RCW trumps the WAC. Safety was the top priority for everyone, but it did not mean skipping over the concepts of optimization or efficiency. PMSA's view wasn't that PSP was trying to be inefficient. He stated that they recognize the steps PSP has taken. Nor are they saying that PSP is conducting purposeful and willful attempts at being inefficient. He was curious how Bettina characterized PMSA's recommendations as inconsistent with Pilotage Act. With respect to optimization, he suggested it was an impossible target to hit, PMSA understands that, but if an organization was not dedicated to increasing efficiency, then they were missing something. Regarding Jolene's comment, Captain Moore added that while he was in the USCG, they had to look at efficiency all the time and that they had to find ways to do it. He urged the Board to please pay attention to those parts of the RCW and WAC, and to incentivize the pilots to pay attention to those parts. PMSA would appreciate a response back from the BPC regarding the efficiency recommendations adding that they never got a reply, whether they were relevant or not. He wondered, what was the point of PMSA taking the time to provide those recommendations if they were not relevant or helpful? Since the on-watch scheduled pilots exceeded demand by more than 20%, he urged the Board to go slow today and audit what exactly was causing comp days and callbacks. Regarding comp days, were there management things that could be done? Was it a cruise ship season issue? Could Fridays be a better transition day? Regarding unnecessary data collection, he suggested perhaps a smaller snapshot audit with a 5-year average. He added that if the trailing 12 were applied to past 5 years, number would have gone down to 46. But a multiyear average was steadier. He mentioned the 2014 & 2015 PSP requests for less pilots and more pilots within a few months of each other. He suggested that not everything could be attributed to rest rule changes and to consider doing a macro analysis, urging the BPC to dive into efficiency with a possible audit. PMSA's research suggested the retention age was going up. With respect to their letter and rebuttal, PMSA would appreciate the decision be incremental with a commitment to look at the suggestions and determine whether those comments are helpful in the future. PMSA will continue to provide service announcements, as they are not recommending reviewing the number every 12 months. He suggested a trigger based on data and trends as opposed to a timeframe to help focus the effort. Chair Tonn asked if Captain Moore had read the responses provided by staff to the suggestions. He had not and she urged him to do so.

Commissioner Hamilton wondered about the triggers to the 2014/2015 number of pilots change. Captain Moore responded that PSP's previous Executive Director Walt Tabler had called and asked, as it would be more in line with their wishes for compensation. They all looked at the numbers and PMSA agreed. Multiple parties agreed to make a joint recommendation. Chair Tonn remembered being on the Board for the second decision. Sheri recalled that at the time there was a vacant position at PSP, during the reduction vote. Captain Carlson added some insight into the reduction in 2014/2015. There had been a longshoreman strike in Nov 2014, and assignments were down.

Captain Carlson reminded that Board that the TAL has been set at 123. The recommendation for the TAL was established by the PSC by a unanimous vote except for PMSA. The PSC had reviewed extensive data, including information about PSP's efficiency measures, and everything was addressed. Most of the number of pilots determination is wrapped up in the TAL analysis. What was left was to determine the number of pilots based on the 123 TAL and an annual assignment forecast. He disputed PMSA's forecast, which included data going back 7 years. He didn't believe that was an appropriate inclusion. Chair Tonn agreed that that everyone was buried in data.

Commissioner Bendixen reminded everyone that this is a safety issue. Pilots are not flippantly taking comp days. She added that there are 15+ pilots in the upgrade window currently, some who have to take comp days to do those upgrades. Commissioner Drennen commented that he was aware that comp days were legitimate, but that it created the self-eating loop. Commissioner Bendixen argued that if the number of pilots is increased, the comp days will go down. PSP's activity reports reflect that. But,

according to Commissioner Drennen, the numbers balance out over time, and it had been noted previously that the Board would not staff to peaks.

Commissioner Farrell had two points. First, he disagreed with Commissioner Bendixen's description of how much time is required for an upgrade trip and felt there was double counting. There was some dispute about this conclusion amongst the commissioners. Second, he stated much of the discussion was entirely speculative about what was going to happen. PSP just got to 56 licenses. He suggested the process is ill-timed and that there isn't enough data to see what a complement of 56 will mean for the efficiency and safety of the pilotage system. He suggested the process be delayed until the data was available.

At this point, Chair Tonn called a break to be followed with more discussion. Prior to the break, BPC AAG Albert Wang responded to PMSA's comments. He agreed that the RCW and WAC do contain a mandatory duty regarding safety, efficiency, etc. And that the WAC contains additional items. The reason he had brought it up was that there was a suggestion in the PMSA submittal that the Board was to take them into account and failure to do so would be "arbitrary and capricious". He did not agree with that for reasons described at the beginning of this topic. The RCW and WAC were designed to give the Board the maximum latitude at its discretion for safety and efficiency, etc.

After the break, Chair Tonn asked for public comment. Port of Grays Harbor Pilot and BPC PSC, TEC, and Exam Committee member Captain Ryan Leo, noticed that the discussion focused around the TAL, and as a member of PSC and someone not invested in the outcome, he wanted to speak to the PSC process. The PSC had four additional meetings for the TAL discussion in addition to their regular meetings. The group reviewed large amounts of data, had in depth discussions about inefficiencies static and dynamic, ship delays, COVID and whether to include it, road projects in Seattle regarding travel time, looked at TALs of Columbia River Pilots (106) and BC Coast Pilots (110) who have similar assignment times. He believed the recommendation was fair, safe, and on par with other groups. As an Exam Committee member, he suggested it was good to keep a workload on par with other districts. He also added that the analysis was in depth and exhaustive. He believed everyone did a great job and he learned a lot. He was fully confident in the TAL of 123.

PSP Pilot and PSC Co-Chair Captain John Scragg seconded Captain Leo's comments. Captain Scragg commended the Board on the comprehensive process. He and Commissioner Drennen, PSC Co-Chair, wanted something less contentious in the future and believed this was moving in the right direction. He appreciated the Board putting safety first as it is PSP's top priority. Captain Moore, regarding the TAL recommendation of 123, added that the committee had discussions regarding the number, and that they were around a range of 122-128. BPC Executive Director Jaimie Bever reiterated that range discussion and PMSA's approval of the range. Executive Director Bever asked Captain Moore if he concurred with the recommendation agreed upon at the PSC. He replied that there needed to be a commitment for continuous improvement on efficiency measures. That was the basis and approach for the recommendations in PMSA's submittal.

After public comment was heard, Chair Tonn asked for any motions.

Motion: Kirtley/Hamilton – adopt the staff recommendation level of licenses at 60.

Regarding the proposed motion, Commissioner Farrell said that his preference was to hold the process until there was more data about 56 pilots. He added that he would not vote in favor of 60. Commissioner Firth commented that he agreed with Commissioner Farrell regarding not having enough data on 56 and suggested choosing a different time in the future for the process. He added that both proposals were compelling; one a long-term forecast and one a on short-term forecast. He tended to lean toward long-term data.

Amended Motion: Drennen/Firth – set the number of licenses in Puget Sound to 58 with a commitment to review in a year with day-to-day data – Failed with 3 in favor and 6 opposed.

Commissioner Anthony said that he would support 60 because staff did a great job with data. Commissioner Drennen agreed adding that what was missing was a little data on the day-to-day activities. Commissioner Farrell inquired with Commissioner Drennen regarding his support for 58. Commissioner Drennen responded that he was going back to the comp day numbers and how they were being burned. If there were two pilots added, they could cover most of the difference between the two. Commissioner Bendixen commented that the TAL was set at 123 and that all the needed discussion happened during that process. She had no good reason not to support the recommendation from a non-

biased data analyst from staff. She added that Bettina had said at multiple times that when she looks at the data it appeared to her that pilots were doing what they are supposed to be doing. She reminded everyone that it takes 7 years to get someone ready to replace an unlimited pilot, there was one person currently in the graduate program, and they are calling 7 pilots back tomorrow due to pilot shortages. She didn't have a good reason to support anything less or more than 60. Commissioner Kirtley flagged continued efforts at the PSC for additional efficiencies and safeguards. Chair Tonn found the number of mandatory retirements to be a very compelling number. It would be relatively easy to adjust the number if need be and it will take a while to get to the decided-upon number. She added that the BPC was dealing with a lot of variables that can't necessarily be controlled based on when people may choose to retire or come in to train or go to other districts. The current list was too thin. Commissioner Bendixen added that there was no incentive to take the exam if there was not a spot available, which lowers the ability to attract. The motion on the table was to amend the main motion from 60 to 58 with another look in 12 months including a sample of daily data regarding pilot availability.

Main Motion Amendment: Kirtley/Hamilton – direct the PSC to investigate comp day usage potentially developing safeguards and guidelines – Carried with 8 in favor and 1 opposed.

Main Motion Final: Kirtley/Hamilton – adopt BPC staff recommendation of licenses at 60 and direct the PSC to investigate comp day usage potentially developing safeguards and guidelines – Carried with 7 in favor and 2 opposed.

Chair Tonn thanked everyone, especially Bettina, PSP, and PMSA for all the work. Documentation will be compiled and stored in one place on the BPC website. She had talked about efficiency analysis with Bettina, and they will report back with some of those discussions, including looking at three categories of work: direct, indirect, operational – she noted this was based on a laboratory staffing process, which has some surprising similarities to the way shipping works.

#### **Pilot's Report of Incident: *CAPE INTREPID* 7/23/2024**

On July 23, 2024, during a dead ship maneuver involving *CAPE INTREPID* and *CAPE ISLAND*, a gangway was damaged due to lack of available crew to retract it per the pilot's request. Commissioner Anthony presented a Preliminary Incident Report. Chair Tonn thanked Commissioner Anthony for his work on the investigation. While reviewing, Commissioner Bendixen stated that PSP has directed their Safe Practices Committee to review the guidelines regarding dead ship maneuvers. She mentioned that there was a great article written by the past APA president on jurisdiction that she will send out to the Board.

Motion: Bendixen/Anthony – File as an incident and follow the recommendations reported for reviewing guidance for dead ship maneuvers – Carried.

#### **Pilot's Report of Marine Safety Occurrence: *F/V MADNESS (CARNIVAL LUMINOSA)*, 07/18/2024**

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| Seattle, underway on approach to Pier 91 | VTS was in sporadic contact with fishing vessel <i>MADNESS</i> prior to <i>CARNIVAL LUMINOSA</i> arriving at Buoy SG. The pilot attempted to contact the fishing vessel on channels 16,14,13 to notify them of the cruise ship's intentions and to better determine direction of the fishing vessel's net but there was no response. There was an anchored ship in Smith Cove East Anchorage. There were no security patrols on this morning. The net was very close to the typical approach corridor of cruise ships and was in the Security Zone. | <u>Motion:</u> Anthony/ Farrell – File as a Marine Safety Occurrence – Carried. |
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#### **Pilot's Report of Marine Safety Occurrence: *Crabbing Boats (ATB SEA RELIANCE)*, 07/21/2024**

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| Tacoma, underway while backing out of the Hylebos Waterway | While backing out of the Hylebos Waterway and approaching the entrance, the pilot noticed 8 small recreational crabbing boats were stationary and tending pots, stretching from the vicinity of Buoy 1 towards the end of Pier 23. Numerous crab pots were also strewn about the same area, limiting options for maneuvering. On approach to Trident Seafoods, pilot sounded whistle to get the attention of the boats, but none changed position. The only clear area was a gap NW of the end of Pier 23. The pilot let the stern tug ( <i>ARTEMIS</i> ) go a | <u>Motion:</u> Farrell/Drennen – File as a Marine Safety Occurrence – Carried. |
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|  | bit early and tasked the tug to get the attention of the nearest boats to ask them to move out of the way so that the vessel could turn around. Two boats did move off to the west, which left just enough room among the others to make a tight swing in between Buoy 1 and Pier 23. A few crab pot buoys did go down the side of the barge, but none were caught in any running gear or otherwise dragged or damaged. The turn was completed safely, and the vessel maneuvered around the remaining pots before reaching deeper open water. |  |
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**Pilot's Report of Marine Safety Occurrence: *CELEBRITY EDGE*, 07/19/2024**

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| Underway, 2nm north of Buoy SG | While inbound for Seattle Pier 91, the vessel lost propulsion southbound in the traffic lanes 2nm north of "SG". Vessel did maintain steering. VTS was notified as well as the ships in the vicinity. Pilot called for any available tugs in Seattle. Tug <i>RESPONSE</i> proceeded to vessel location from Pier 17. Vessel never left the traffic lanes. When approx. 75nm south of "SG", vessel regained propulsion on the stbd. pod, and vessel proceeded into Seattle. Troubleshooting of the port pod continued with no success. Vessel was docked with just the stbd. pod, bow thrusters, and using the tug <i>RESPONSE</i> aft to assist. The reason for loss of propulsion was not determined but pilot was confident it was related to an electrical problem with the port pod, which caused the auto load shedding of power to other systems. | <u>Motion:</u> Farrell/Drennen – File as a Marine Safety Occurrence – Carried. |
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**Pilot's Report of Marine Safety Occurrence: *YM TOGETHER*, 07/25/2024**

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| Berthed at Tacoma, Pier 4 | Prior to departure, with tugs made fast, pilot was informed that 1 of the 11 ME cylinders had a malfunctioning fuel injector valve. It was requested to isolate the 1 cylinder and transit the pilotage area with 10 working cylinders and limited RPM of 54 instead of 60, and speed of 14-15 kts., with the repair to be made offshore. Pilot notified the USCG, Dispatch, and ship's agent. Another ship was approaching the harbor to take the berth. After speaking with the USCG and awaiting an order from the COTP, pilot told them he was comfortable with having them isolate the valve so the ships engine could maneuver, and taking the ship off the berth with 3 tugs to make room for the inbound vessel, and proceed to anchor in Commencement Bay awaiting the order. Valve was isolated and permission was granted to take the vessel off the berth. Ship anchored at Ruston Anchorage Tacoma. | <u>Motion:</u> Farrell/ Firth – File as a Marine Safety Occurrence – Carried. |
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**Pilot's Report of Marine Safety Occurrence: *TORM LAURA*, 07/25/2024**

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| Underway, in vicinity of Cherry Point | During the MPX, the Master indicated that all machinery (including propulsion) was in good working order with no deficiencies. He noted that an Engine Power Limiter (EPL) was installed during the call at Cherry Point, and this would be their first time underway with it. A technician who helped install the EPL was still onboard and would be riding the ship to PAANC. The EPL was equipped with an electronic override button on the bridge that would bypass it, if deemed necessary. The presence/installation of the | <u>Motion:</u> Bendixen/Drennen – File as a Marine Safety Occurrence – Carried. |
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|  | <p>EPL was not passed on to PSP dispatch and was not in the vessel notes. The engine responded properly to Dead Slow Ahead and Slow Ahead bells. However, when ordered for Half Ahead, the engine did not appreciably increase power. The pitch increased, leading to moderate vibrations, but the engine RPM remained about the same. At this point, the vessel was just about due north of Alden Bank, and the pilot was becoming more concerned with the ability of the ship to maneuver properly and changed route intentions to transit Rosario Strait instead of Haro. With the changing tide and limited speed ability of the ship, pilot decided the best course of action was to anchor at the Cherry Point General Anchorage. Tug <i>BO BRUSCO</i> was dispatched to escort vessel to Smith Cove West. Vessel anchored successfully with no further issues.</p> |  |
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**Pilot's Report of Marine Safety Occurrence: *Sport Fishing Vessels (RJ PFEIFFER)*, 07/26/2024**

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| Underway, Southbound at Buoy SF | <p>While transiting south from pilot station to Tacoma, the vessel encountered many recreational fishing vessels (VTS stated 100-200 vessels) at Jefferson Point (SF Buoy). Due to density of vessels, there was no choice but to exit the southbound lane and use the northbound lane to get around the fishing vessels. VTS notified pilot of the recreational fishing vessels previously therefore vessel was at maneuvering speed when fishing vessels were encountered. Luckily there were no northbound vessels and using the northbound traffic lane was an option. VTS had made several broadcasts on channel 16 warning that the vessel was approaching and that fishing vessels were not to impede; however, no vessels moved.</p> | <p><u>Motion:</u> Farrell/Drennen – File as a Marine Safety Occurrence – Carried.</p> |
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**Pilot's Report of Marine Safety Occurrence: *Sport Fishing Fleet (LIBERTY PASSION)*, 07/27/2024**

|                       |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |                                                                                        |
|-----------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------|
| Underway near Buoy SF | <p>As vessel approached SF buoy southbound there were many boats in southbound traffic lanes and some boats in northbound lanes as well. Pilot reduced to maneuvering speed early to be at about 15 knots off Kingston and sounded a 5 second warning blast on the ship's whistle. Pilot confirmed with VTS that USCG was on patrol with <i>TERRAPIN</i> in the area, thinking that they could assist vessel through the dense fishing traffic. At 2 miles before buoy SF, vessel slowed to half ahead and then to slow ahead for a speed of 10 knots, called <i>TERRAPIN</i> (no response) and again sounded warning signal. When vessel reached Buoy SF, sounded 1 short blast and started turn to the middle of the lane. Dropped engine to dead slow ahead for 7 knots. Again called <i>TERRAPIN</i> on VHF 16. After finishing turn, with boats everywhere, some trolling close dead ahead, started sounding 5 short blasts. <i>TERRAPIN</i> called on VHF 16 about this time. Pilot advised boats were as close as 100 ft dead ahead and asked for assistance. <i>TERRAPIN</i> maneuvered through the boats reaching vessel as it finished through the worst of the traffic.</p> | <p><u>Motion:</u> Drennen/ Anthony – File as a Marine Safety Occurrence – Carried.</p> |
|-----------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------|

**Pilot's Report of Marine Safety Occurrence: *TUG RESPONSE (OTIS)*, 07/09/2024**

|                                             |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |                                                                                   |
|---------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------|
| Underway, on approach to Cherry Point South | Communications between ship and tug <i>RESPONSE</i> were not working. There was no acknowledgment of pilot commands on the VHF radio and pilot could visually see <i>RESPONSE</i> pulling instead of stopping as ordered. Several attempts were made to contact <i>RESPONSE</i> on alternate radio channels without success. The stern tug <i>GARTH FOSS</i> was acknowledging commands and did not suffer any VHF radio malfunctions. Pilot stabilized the situation by ordering the stern tug to pull away from the dock "easy 2" and safely took the vessel away from the dock. At the same time, pilot had captain blow the forward whistle several times. Shortly after, communication was restored with tug <i>RESPONSE</i> and vessel proceeded to dock the vessel without further incident. | <u>Motion</u> : Farrell/ Hamilton – File as a Marine Safety Occurrence – Carried. |
|---------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------|

**Committee Actions.**

**Trainee Evaluation Committee (TEC)**

- **Training Program Agreements Puget Sound District: Captains Britton, Shuler & Boullion.**  
TEC Chair Commissioner Bendixen reported that the documents reflect the changes in the WAC and meet the challenges in vessel traffic trends as well as increased observations in the evaluation phase. She did point out that Captain Shuler was exempted from most but not all of the tug requirements due to his extensive background on tugs in Puget Sound.  
Motion: Bendixen/Farrell – approve the Training Program Agreement and Requirements for the incoming trainees as recommended by the TEC – Carried.
- **Request for Delayed Entry into Training Program.**  
Commissioner Bendixen shared a letter written by Captain Daniel Bolton to the Board requesting to delay the start of his training program by more than 2 months. The WAC allows for this scenario and allows the TEC to leapfrog his position to fill the training vacancy and allow him seniority for the next invitation call up.  
Motion: Bendixen/Farrell – accept the requested delay to begin training for Captain Daniel Bolton and authorize BPC staff to send him a positive response to his request – Carried.
- **Training Program Invitation Grays Harbor.**  
Commissioner Bendixen reported that the Port of Grays Harbor would like to request one trainee to start in the Grays Harbor Pilotage District on/before May 31, 2025. In consultation with Grays Harbor Pilot Captain Leo, it was decided that a spring start would best accommodate a trainee to both see and train in the adverse weather that occurs throughout the calendar year in Grays Harbor.  
Motion: Bendixen/Hamilton – authorize BPC staff to issue an invitation for Grays Harbor to start between now and May 31, 2025 – Carried.
- **Pilot License Upgrade Program: Captains Stewart, Holland & Mancini.** The TEC reviewed the 3 upgrade letters for the pilots listed above and made one minor change that does not affect the intent of the letters.  
Motion: Anthony/Farrell– approve the pilot license upgrade programs for Captains Stewart, Holland & Mancini – Carried, with one abstention from Commissioner Bendixen.
- The TEC met yesterday and reviewed all trainee programs. One trainee came to the TEC meeting to discuss his progress. With the licensure of Trainee Sturgell, which will become effective today due to the increase of number of licenses in Puget Sound, there are 3 trainees currently in PS and none in GH. There are 2 trainees in Training, and 1 in Observation.
- The TEC has been discussing the Train-the-Trainer class and curriculum in TEC meetings for many months and are pleased to announce that the first class with instructor Jeff Slesinger, Delphi Maritime, will be held September 4.
- Due to the new job task analysis (JTA) that was conducted for the exam this year, the Training Program Trip Report (TPTR) used by trainees and pilots was revised. The form was also revised for ease of use on both pilots and trainees. Conning Quizzes will also be revised to reflect the changes.

- Commissioner Bendixen shared long term progress of the TEC and the focus for the future. In a turn of events, the Seattle REC is caught up on grading and testing but the delay for trainees is now coming from the NMC with reports of several months delay for getting approval to test.
- Finally, BPC Training Program Manager Jolene Hamel thanked Commissioner Bendixen for her efforts on rewriting and getting training documents prepared for the new candidates, and in turn Commissioner Bendixen thanked her for the heavy lift.

### **Vessel Exemption Committee (VEC)**

- VEC Chair Commissioner Anthony had previously reported that PSP Pilot Captain Travis McGrath was seeking a replacement from the pilot corps for his position on the VEC. PSP Pilot Captain Matt Cassee, who has a background in the yacht industry, has stepped up and volunteered to replace Captain McGrath.  
Motion: Anthony/Farrell – appoint Captain Cassee to the VEC replacing Captain McGrath – Carried.
- The VEC met earlier this month to regroup and vocalize upcoming goals, which included defining passenger vessels, a legislative campaign to change some RCW language, and allow for fee changes, as well as ongoing outreach to the small boating community.
- The VEC will meet again in October.

### **Pilot/Trainee Physical Examination Reports.**

Motion: Farrell/Firth – approve the pilot physical examination reports for Captains R.M. Gartner, S.W. Scott, and E.P. Ninburg for their annual pilot license renewals, B.L. Sturgell for his pre-pilot license renewal, and J.A. Michelson and H.V. Wood for their annual pilot trainee license renewals – Carried.

### **Exemptions from Pilotage.**

**Motor Yacht CARMANAH** – 60', 43gt, Cayman Island registry, Captain Michael Forshee.

Motion: Anthony/Bendixen – concur with Chair Tonn's granting of the interim annual exemption with no conditions – Carried.

**Motor Yacht EVVIVA** – 164', 492gt, Cayman Islands registry, Multiple Captains.

Motion: Farrell/Anthony – grant an annual exemption no restrictions – Carried.

**BPC Strategic Plan.** Executive Director Bever stated that she was still waiting on certain fee structures for the draft of the 25-27 Biennial Budget and will send those out once received. She shared the changes made to the Strategic Plan and Commissioner Bendixen stated that she had done an excellent job on the final draft.

Motion: Bendixen/Drennen - approve the final draft of the 2025-2027 BPC Strategic Plan – Carried.

### **2023 BPC Annual Report.**

The Board has received the final draft of the 2023 BPC Annual Report and Executive Director Bever shared the few minor changes that would be updated before finalization and distribution.

Motion: Kirtley/Drennen - approve the final draft of the 2023 BPC Annual Report and authorize staff to distribute to the Legislators as required – Carried.

### **Committee Updates.**

#### **Pilot Safety Committee (PSC)**

- PSC Co-Chair Commissioner Drennen reported that the PSC met this past Monday and approved minutes from the previous meeting, which have been provided to the Board. They reviewed reports, pilot ladder data and are continuing work on the MSO form to be shared with the Board at a future meeting.
- Commissioner Drennen shared that the International Maritime Organization (IMO) is meeting in December and the PSC will look forward to disseminating any possible recommendations from that meeting.
- The PSC will meet again on November 7.

#### **Diversity, Equity & Inclusion Committee (DEIC)**

- The DEIC has not met since the last report.

#### **Oil Transportation Safety Committee (OTSC)**

- BPC Executive Director and OTSC Chair Jaimie Bever reported that she presented to the Puget Sound Harbor Safety Committee at yesterday's meeting regarding tug escort rulemaking. She provided that presentation to the Board as info.
- The next workshop series will be held in November 2024.

**Confirmation of Next Regular Meeting Dates.** Chair Tonn reminded everyone of the meetings in September and October. All meetings continue to be hybrid, and all are invited and encouraged to attend in person or online.

**Public Comment.** Chair Tonn asked for public comment and Puget Sound pilot Captain Eric Klapperich commented that he wanted to acknowledge the Board's efforts particularly with setting KPI's and the work with the Pilot Safety Committee. He is happy to see the due diligence that is happening and appreciates the hard work.

**Adjourn.** Meeting was adjourned by Chair Tonn at 2:50pm.

Respectfully submitted,

---

Jaimie C. Bever, Executive Director

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Sheri J. Tonn, Chair

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Eleanor Kirtley, Vice Chair

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Commissioner Timothy J. Farrell

---

Commissioner Andrew Drennen

---

Commissioner Richard Firth

---

Commissioner Sandy Bendixen

---

Commissioner Michael Anthony

---

Commissioner Jason R. Hamilton

---

Commissioner Nhi Irwin

## **Port of Grays Harbor**

### **Pilotage Report**

**August 15, 2024**

#### Pilotage Activity

There were 11 arrivals in July (3 dry bulkers, 4 liquid bulker, 1 logger and 3 RoRo) for a total of 27 jobs. Year to date, through July, there have been a total of 66 arrivals for a total of 177 jobs.

The August schedule is looking steady with 5 arrivals schedule so far: 1 liquid bulker, 2 dry bulkers, and 2 RoRo's.

#### Maintenance

The AGP dry bulk export loading facility at Terminal 2 will be down for 2 weeks in August for a planned maintenance shutdown.

#### Terminal Dredging

The pre-dredge meeting was held with all applicable agencies and the contractor on July 24<sup>th</sup>. Minor changes were needed to the dredge and disposal workplan after the meeting and those were revised and resubmitted by the 26<sup>th</sup>. Our Site Use Authorization has been approved and signed by DNR. The last remaining step is performing a pre-dredge survey of the terminals, which is scheduled for August 6<sup>th</sup>. The preliminary start date for dredging is still planned for August 12<sup>th</sup> to coordinate with the planned shutdown at Terminal 2.



Port of Grays Harbor | Pursuing Progress, Together

Press Release:

August 1, 2024

Contact: Kayla Dunlap, Director of Government & Public Affairs

[kdunlap@portgrays.org](mailto:kdunlap@portgrays.org) or 360-533-9590

*For Immediate Release*

## Port welcomes Soy Transportation Coalition to celebrate farmer contribution to Terminal 4 Expansion Project

**Aberdeen, WA** – On Tuesday, the Port of Grays Harbor welcomed dozens of farmer-members of the Soy Transportation Coalition to celebrate the contribution of \$1.3 million to the Terminal 4 Expansion & Redevelopment Project. The generous contribution from the Iowa Soybean Association, the Kansas Soybean Commission, the Nebraska Soybean Board, the North Dakota Soybean Council, the South Dakota Soybean Research and Promotion Council, the Soy Transportation Coalition and the United Soybean Board was announced in late-fall 2022, following the Port's PIDP award.

Recognizing the benefits to American soybean farmers, the contribution helped offset pre-engineering, design and site development costs for the transformational Terminal 4 Project which will add 40,000 feet of additional rail within its Marine Terminal Complex, a new fendering system and a stormwater collection and treatment facility at T4 and create more than 30 acres of additional cargo laydown area to support future operations at Terminal 4A.

"This contribution aided this transformative project during a critical point," shared Executive Director Leonard Barnes. "But this project isn't just about Grays Harbor. This project is about all of you—the farmers—and the transportation of a global food source. And we can't thank you enough for having the confidence in AGP, our Port, and this project to step up and be willing to play such a role."

“It was an easy decision to invest in this project, as the movement of soymeal to global markets benefits farmers near and far,” explained Soy Transportation Coalition Executive Director Mike Steenhoek. “Partnerships like these will continue to pay dividends well into the future for everyone involved.”

The Port’s Project will support AGP’s second commodity export facility to be constructed at Terminal 4B resulting in increased ag exports generating additional vessel calls and more than 80 full-time, family-wage jobs.

“Over the years, AGP has developed a very strong relationship with customers in Southeast Asia,” explained AGP Chairman of the Board Lowell Wilson. “This project at the Port will significantly improve speed, capacity, and product availability for the benefit of our current and future customers. In short, the work being done here will ensure the direct link from the farmer to the international customer grows ever stronger.”

“The financial contribution the Soy Transportation Coalition and the supporting Associations have committed to this important infrastructure project does not go unnoticed by the Port and our community,” stated Port Commission President Phil Papac. “We are incredibly proud of the role the Port plays in exporting the crops that you grow, that AGP processes, and that help feed millions of people throughout the world.”

Founded in 1911, the Port of Grays Harbor is one of Washington State’s oldest port districts and Washington’s only deep-water port located directly on the Pacific Ocean. The Port of Grays Harbor operates 4 deep-water marine terminals, the Westport Marina, Bowerman Airport, Grays Harbor Pilotage Services, numerous public waterfront access facilities, and industrial and business parks throughout the County. The addition of Satsop Business Park increased the Port’s properties to more than 1,000 acres of industrial properties and an additional 1,200 acres of sustainably managed forestland. Strategically located midway between Seattle and Portland and less than 1 ½ hours from open sea, the Port of Grays Harbor provides businesses a diverse portfolio of facilities. More information on the Port of Grays Harbor’s facilities and operations is available at [portofgraysharbor.com](http://portofgraysharbor.com) or [satsop.com](http://satsop.com)



*The Port Commissioners and Executive Director are presented with a ceremonial check from the Soy Transportation Coalition and members of its supporting associations for the Terminal 4 Expansion & Redevelopment Project*



*Members of the Soy Transportation Coalition from throughout the U.S. joined AGP Board members and staff, along with ILWU Local 24 representatives and Port Commissioners and staff to celebrate their contribution to the T4 Project*

# PUGET SOUND PILOTAGE DISTRICT ACTIVITY REPORT

**Jul-2024**

The Board of Pilotage Commissioners (BPC) requests the following information be provided to the BPC staff **no later than two working days prior to a BPC meeting** to give Commissioners ample time to review and prepare possible questions regarding the information provided.

## Activity

|                                                      |                 |                   |                                         |            |     |
|------------------------------------------------------|-----------------|-------------------|-----------------------------------------|------------|-----|
| Total pilotage assignments:                          | 640             | Cancellations:    | 13                                      |            |     |
| Total ship moves:                                    | 627             | Cont'r:           | 158                                     | Tanker:    | 198 |
|                                                      |                 |                   |                                         | Genl/Bulk: | 81  |
|                                                      |                 |                   |                                         | Other:     | 190 |
| Assignments delayed due to unavailable rested pilot: | 17              | Total delay time: | 92.75                                   | hours      |     |
| Assignments delayed for efficiency reasons:          | 9               | Total delay time: | 21                                      | hours      |     |
| Billable delays by customers:                        | 30              | Total delay time: | 133                                     |            |     |
| Order time changes by customers:                     | 138             |                   |                                         |            |     |
| 2 pilot jobs:                                        | 36              | Reason:           | PSP GUIDELINES FOR RESTRICTED WATERWAYS |            |     |
| Day of week & date of highest number of assignments: | Sunday, 7/7/24  |                   |                                         |            | 36  |
| Day of week & date of lowest number of assignments:  | Monday, 7/22/24 |                   |                                         |            | 12  |
| Total number of pilot repositions:                   | 162             | Upgrade trips     | 15                                      | YTD        | 119 |
| 3 consecutive night assignments:                     | 41              | YTD               | 290                                     |            |     |

## Callback Days/Comp Days

|            | Starting Total | Call Backs (+) | Used (-) | Burned (-) | Ending Total |
|------------|----------------|----------------|----------|------------|--------------|
| Licensed   | 2609           | 72             | 80       |            | 2601         |
| Unlicensed | 99             |                |          | 14         | 85           |
| Total      | 2708           |                |          |            | 2686         |

**On watch assignments 562      Call back assignments 78      CBJ ratio 12.19%**

Pilots Out of Regular Dispatch Rotation (pilot not available for dispatch during "regular" rotation)

## A. Training & Continuing Education Programs

| Start Dt | End Dt | City | Facility | Program Description          | Pilot Attendees                                     |
|----------|--------|------|----------|------------------------------|-----------------------------------------------------|
| 1-Jul    | 31-Jul |      |          | Upgrade Assignments On Duty  | HAM(1), GAR(1), MOO(1)                              |
| 1-Jul    | 31-Jul |      |          | Upgrade Assignments Off Duty | BOS(3), EKE(3) GAR(1), MCN(1), MEL(1), SID(2)       |
|          |        |      |          |                              |                                                     |
|          |        |      |          |                              |                                                     |
|          |        |      |          |                              | * On Watch      Off Watch      ** paired to assign. |
|          |        |      |          |                              | 3      11                                           |

## B. Board, Committee & Key Government Meetings (BPC, PSP, USCG, USACE, Port & similar)

| Start Dt | End Dt | City    | Group | Meeting Description | Pilot Attendees      |
|----------|--------|---------|-------|---------------------|----------------------|
| 1-Jul    | 4-Jul  | Seattle | PSP   | Administrative      | KLA(3on*)            |
| 4-Jul    | 18-Jul | Seattle | PSP   | Administrative      | GRK(14on*)           |
| 5-Jul    | 5-Jul  | Seattle | PSP   | Administrative      | HAM*, KLA            |
| 9-Jul    | 10-Jul | Seattle | PSP   | Administrative      | HAM(2on*), KLA(2off) |
| 8-Jul    | 8-Jul  | Seattle | BPC   | BPC                 | BEN                  |
| 11-Jul   | 11-Jul | Seattle | PSP   | Rate Committee      | GRK*, KLA, KNU, MCG  |
| 16-Jul   | 16-Jul | Seattle | PSP   | Outreach            | BOS                  |
| 16-Jul   | 16-Jul | Seattle | BPC   | BPC-Prep            | ANT, BEN, KLA, KNU*  |

| Start Dt | End Dt | City         | Group | Meeting Description                | Pilot Attendees             |           |                      |  |
|----------|--------|--------------|-------|------------------------------------|-----------------------------|-----------|----------------------|--|
| 17-Jul   | 17-Jul | Port Angeles | PSP   | Outreach, Educational, Legislative | BOZ, NIN                    |           |                      |  |
| 17-Jul   | 17-Jul | Seattle      | BPC   | TEC                                | ANT, BEN, KNU*              |           |                      |  |
| 17-Jul   | 17-Jul | Seattle      | PSP   | Outreach                           | MAN                         |           |                      |  |
| 17-Jul   | 17-Jul | Seattle      | BPC   | OTSC                               | BOU**                       |           |                      |  |
| 18-Jul   | 18-Jul | Seattle      | BPC   | BPC                                | ANT, BEN, BOU, KNU*         |           |                      |  |
| 18-Jul   | 18-Jul | Everett      | PSP   | Outreach                           | COL*, RID*                  |           |                      |  |
| 19-Jul   | 19-Jul | Seattle      | PSP   | Rate Committee                     | GRK, KLA*, KNU*, MCG*       |           |                      |  |
| 19-Jul   | 20-Jul | Seattle      | PSP   | Administrative                     | GRK (2off)                  |           |                      |  |
| 19-Jul   | 19-Jul | Port Angeles | PSP   | Outreach, Educational, Legislative | NIN                         |           |                      |  |
| 22-Jul   | 22-Jul | Seattle      | PSP   | UTC                                | KLA*, MCG*                  |           |                      |  |
| 22-Jul   | 31-Jul | Seattle      | PSP   | Administrative                     | KLA(10on*)                  |           |                      |  |
| 23-Jul   | 23-Jul | Seattle      | PSP   | BOD                                | GRK, KLA*, HUP*, MCG*, MYE* |           |                      |  |
| 23-Jul   | 23-Jul | Grays Harbor | BPC   | BPC                                | BEN**                       |           |                      |  |
| 24-Jul   | 24-Jul | Port Angeles | PSP   | Outreach, Legislative              | NIN                         |           |                      |  |
| 29-Jul   | 29-Jul | Seattle      | BPC   | OTSC                               | BOU                         |           |                      |  |
|          |        |              |       |                                    |                             |           |                      |  |
|          |        |              |       |                                    |                             |           |                      |  |
|          |        |              |       |                                    |                             |           |                      |  |
|          |        |              |       |                                    |                             |           |                      |  |
|          |        |              |       |                                    | * On Watch                  | Off Watch | ** paired to assign. |  |
|          |        |              |       |                                    | 45                          | 26        | 2                    |  |

## PUGET SOUND PILOTAGE DISTRICT ACTIVITY REPORT PAGE 2

### Safety/Regulatory

### Outreach

### Administrative

### C. Other (i.e. injury, not-fit-for-duty status, COVID risk)

| Start Dt | End Dt | REASON     | PILOT |    |
|----------|--------|------------|-------|----|
| 4-Jul    | 5-Jul  | COVID risk | HOA   | 2  |
| 4-Jul    | 13-Jul | COVID risk | COL   | 10 |
| 9-Jul    | 16-Jul | COVID risk | ROU   | 8  |

Number of assignments during the 12 months prior to setting the number of pilots at 56 at the July 2019 065 hearing.

7,101

Number of assignments during the last 12 months (Aug 2023-Jul 2024).

7,625

Call back job ratio during the last 12 months (Aug 2023-Jul 2024) **13.29%**.

# Puget Sound District Activity Report Dashboard

2024 July

Last modified  
08/12/2024

Licensed Pilots  
Including President

56

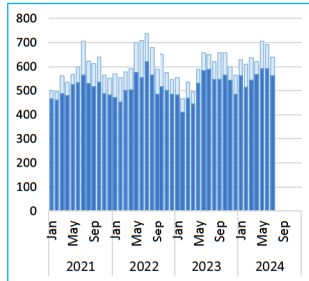
On July 4 Capt. Kearns retired and  
Capt. Fleischfresser was licensed

PS District  
Trainees

4

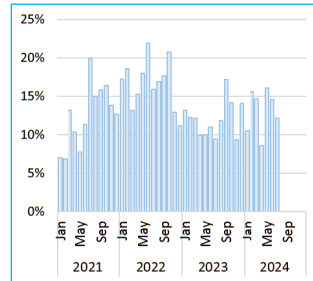
3 on stipend  
1 off stipend

Monthly Total  
Assignment Count  
**640**

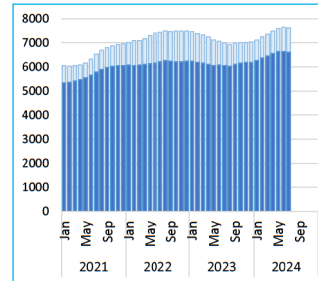


562 On-Watch (dk blue), 78 Off-Watch (lt blue)

Monthly Off-Watch  
Assignment Percentage  
**12%**

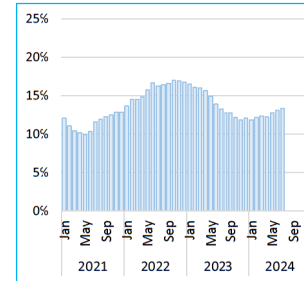


Trailing 12 Total  
Assignment Count  
**7626**



6613 On-Watch (dk blue), 1013 Off-Watch (lt blue)

Trailing 12 Off-Watch  
Assignment Percentage  
**13%**



Licensed Pilots w/o Pres **55**  
Pilots NFFD whole month **0**  
Available Pilots **55**

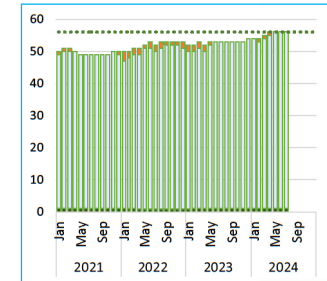
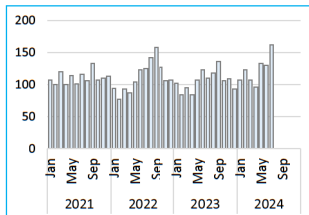
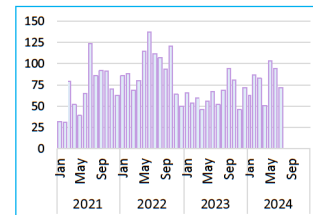


chart also includes president (1 pilot)

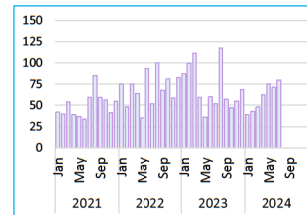
Repositions  
**162**



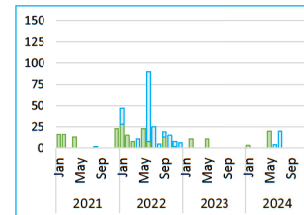
Comp Days Earned  
(Callbacks)  
**72**



Comp Days Used  
(Licensed Pilots)  
**80**

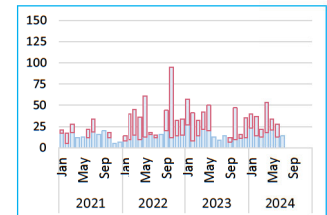


COVID Days\* **20**  
NFFD Days\* **0**



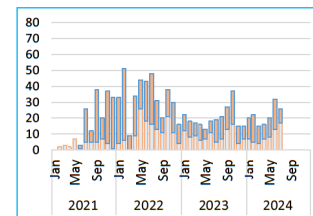
count of NFFD & Covid days if  
pilot(s) not NFFD whole month

Training Days **0**  
Upgrade Trips **14**



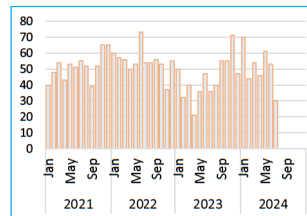
training days (red) stacked  
on upgrade trips (blue)

Pilot Delays (Count)  
combined total  
**26**

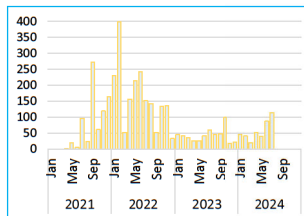


efficiency delay counts stacked on top  
of pilot shortage delay counts on bottom

Billable Delays (Count)  
by Customers  
**30**

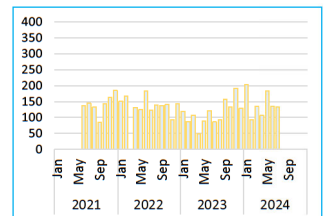


Pilot Delay Hours  
(Pilot Shortage & Efficiency)  
**113.75 hrs**



total pilot delay hours (not separated into  
efficiency & pilot shortage components)

Billable Delay Hours  
by Customers  
**133 hrs**





## WA State Board of Pilotage Commissioners Industry Update

August 15, 2024 Meeting

### Arrivals Up 10 in July 2024 to July 2023 Comparison

|                                  |                       |
|----------------------------------|-----------------------|
| ✚ Containers up 5                | ✚ Car Carriers up 2   |
| ✚ Bulkers up 1                   | ✚ Tankers up 8        |
| ✚ General & Other even           | ✚ ATB's <b>down 2</b> |
| ✚ Cruise/Passenger <b>down 5</b> | ✚ RoRo's up 1         |

### YTD Arrivals More than 2023 But Less than 2022

As suggested in our update last month it is helpful to look at longer-term trends by vessel type. Container & bulker arrivals have dropped significantly compared to 2021 and 2022 while cruise & tankers rebounded from 2021. **There are 22 fewer arrivals YTD than 2022.** The chart essentially shows the cyclical nature of vessel arrivals though the long term arrival trend is down (Marine Exchange).

| YTD Thru July            | 2021        | 2022        | 2023        | 2024        |
|--------------------------|-------------|-------------|-------------|-------------|
| BULK                     | 201         | 202         | 123         | 173         |
| CONTAINER                | 551         | 476         | 432         | 457         |
| GENERAL                  | 45          | 59          | 46          | 56          |
| OTHER                    | 25          | 37          | 24          | 24          |
| PASSENGER                | 24          | 188         | 167         | 160         |
| RO/RO                    | 63          | 67          | 62          | 66          |
| VEHICLES                 | 126         | 101         | 156         | 156         |
| <b>SUBTOTAL</b>          | <b>1035</b> | <b>1130</b> | <b>1010</b> | <b>1092</b> |
|                          |             |             |             |             |
| PETROL TANKER            | 210         | 255         | 230         | 290         |
| ATB                      | 92          | 105         | 84          | 86          |
| <b>SUBTOTAL</b>          | <b>302</b>  | <b>360</b>  | <b>314</b>  | <b>376</b>  |
|                          |             |             |             |             |
| <b>PUGET SOUND TOTAL</b> | <b>1337</b> | <b>1490</b> | <b>1324</b> | <b>1468</b> |

### Daily Arrival Volumes

This year daily arrivals averaged over 6 during non-cruise season and around 8 during cruise season. Daily arrivals fell between 5 and 10 on twenty-four days with most of the remaining seven days at either 4 or 11. The number of days with a lot of arrivals or very few continues to trend down as there are significantly fewer days with more than 10 arrivals than there used to be. This means fewer arrival surge day assignment challenges.

# **Stormwater Proposed Permit Threatens Gateway Terminals**

*Excerpt from Stakeholder Comments on Proposed Permit*

Washington companies that export manufactured and agricultural commodities take advantage of infrastructure developed and maintained by revenues generated by discretionary import cargo from Asia. The companies that make decisions about where that discretionary cargo goes do so based on cost, productivity, and regulatory certainty. If terminals must be fully or partially closed in the future due to an expanded scope of the ISGP, they are very able to call on ports in Canada and up and down the West Coast and the Panama Canal to reach their destinations in the Midwest and South. ***This will in turn limit the number of ships and containers available to Washington's exporters resulting in greater cost and limiting access to foreign markets.***

All this disruption would be for little if any ecological benefit, as most of these areas are already regulated under municipal NPDES permits. Likely results of requiring ISGP coverage on wharfs and subsequent wharf reconstruction include:

- *Enormous cost of reconstructing wharfs that do not currently have the means to sample or capture stormwater for treatment, previously estimated at over \$1.1M per acre;*
- *Potential for daily penalties from Ecology or a citizen plaintiff during construction due to being "out of compliance" until completion;*
- *Reduced port capacity during construction;*
- *Reduced work at marine terminals during construction;*
- *Diversion of ships and cargo to ports outside Washington that might not return;*
- *Increased operating costs to manage stormwater not faced by operations outside Washington*

## **NWSA Managing Directors Action Item - Litigation Funding To Challenge Permit at Supreme Court**

August 7, 2024 Action Item

*Dual Action NWSA and Port of Tacoma: litigation direction to file a petition for writ of certiorari of the Ninth Circuit's decision in Puget Soundkeeper Alliance v. Port of Tacoma et al., and authorize the NWSA to fund such effort in an amount up to \$250,000 in related additional legal and defense costs.*

## **News Concerning Potential Strike Actions for Canada West Coast Ports, Canadian Rail or ILA on East and Gulf Coasts**

Instead of providing news article summaries here per our normal update, we will provide a verbal briefing since we submit this update 8 days before the BPC meeting. There will likely be more up to date news at that time. As for ship calls and cargo changes in the PNW, we are not seeing that in the available data right now and we'll talk further with our members and coordinate an update with the NWSA for the August 15 BPC meeting.



July 2024

## Partial June TEU Numbers

The **West Coast Trade Report** monitors 25 North American container ports, twenty in the United States, three in Canada, and two on Mexico's Pacific Coast. All ports we track save the Port Authority of New York/New Jersey post their latest TEU tallies in time for our publication date. A few other U.S. container ports (notably including the Ports of Wilmington in Delaware and North Carolina, and the Port of Mobile in Alabama) choose not to make their TEU statistics public.

What are other trade analysts expecting to see in June? In a July 9 press release, the National Retail Federation's Global Port Tracker (NRF/GPT) projected that inbound loads arriving in June at the thirteen U.S. ports it monitors would amount to 2.1 million TEUs, up 14.5% year-over-year. Descartes Systems Group (DSG) anticipates that container import volumes would grow by 10.4% from June 2023 to 2,297,979 TEUs. (Note that DSG data apply to all U.S. ports, not just those surveyed by the NRF/GPT.)

In Southern California, the **Port of Los Angeles** recorded 428,753 inbound loads in June, down 1.5% from a year earlier but up 8.2% from June 2019. Outbound loads (122,515) rose 13.4% year-over-year but remained 12.1% below the 396,307 outbound loads reported in June 2019. Total container traffic through the nation's busiest container port in this year's first-half (4,731,491) was 4.2% higher than in the first six months of pre-pandemic 2019.

The **Port of Long Beach** had its fourth busiest month ever in June, with total container moves (loads and empties) amounting to 842,446 TEUs. Inbound loads (419,698) were up 53.0% from a comparatively sluggish June 2023 and were 26.6% higher than in June 2019. Outbound loads (98,300) rose 4.0% from a year earlier but remained 26.6% below the volume recorded five years earlier. YTD, total TEU traffic through the Southern California gateway (4,291,626) was up 16.4% from the first half of 2019.

Up at the San Francisco Bay Area's

**Port of Oakland**, June produced some deceptively impressive figures. Inbound loads (84,040) jumped by 26.8% from a year earlier, but June 2023 was the slowest June for imports the port had seen since 2020. As it was, inbound loads were up just 3.9% from pre-pandemic June 2019. Outbound loads (66,540) meanwhile rose by 22.9% from a lackluster June 2023 but were down by 11.2% from June 2019. Through this year's first half, total container moves (1,135,778) though the Northern California port were down 9.5% from the same period in 2019.

In the Pacific Northwest, the **Northwest Seaport Alliance Ports of Tacoma and Seattle** handled 129,789 import loads in June, a 42.5% jump year-over-year as well as a 14.6% increase over June 2019. Export loads (51,656) were up 12.6% from a year ago but just 0.6% ahead of the volume seen in June 2019. Total container moves YTD through the two Washington State ports (1,557,762) were up 13.8% from the first half of

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## Partial Tallies

Continued

Across the border in British Columbia, the **Port of Vancouver's** 152,912 inbound loads in June exceeded last June's total by 20.0%, while edging up just 4.3% over June 2019. Outbound loads (67,573) in June were up 3.7% year-over-year but down 33.6% from June 2019. Total container traffic through the Canadian port in the first-half of 2024 (1,769,093) exceeded the volume in the same period in 2019 by 4.3%.

The five U.S. West Coast ports we track collectively handled 1,075,746 inbound loads in June, a 21.9% bump over the preceding June and up 15.3% from June 2019. Outbound loads (341,037) were up 11.8% year-over-year but down 15.1% from June 2019.

The **Port of Virginia** reported 124,991 inbound loaded TEUs in June, a very modest 0.5% gain over a year earlier but a 10.9% increase from June 2019. Outbound loads (95,262) rose by 15.6% year-over-year and 24.5% from the sixth month of pre-pandemic 2019. Total container traffic through the Mid-Atlantic Coast gateway through the first half of this year (1,792,540) was up 23.2% over the same period in 2019.

On the Gulf Coast, **Port Houston** handled 153,778 inbound loads, a 4.9% gain from a year earlier but a whopping 46.2% increase over June 2019. Outbound loads through the Texas port (114,728) were up 10.6% year-over-year but just 7.8% over June 2019. Total container traffic through the first half of 2024 (2,098,117) represented a 12.9% increase from the same period a year ago but a 43.6% expansion over the volume handled in the first six months of 2019.

## FOR THE RECORD

# Complete May 2024 TEU Statistics

On July 9, the National Retail Federation/Global Port Tracker (NRF/GPT) reported that the thirteen U.S. mainland ports it monitors handled 2.08 million TEUs in May, a 7.5% increase from a year earlier. Although the NRF/GPT statement describes May as "the latest month for which final numbers are available", it then concedes its tally includes "estimates for the ports of New York and New Jersey, which have not reported TEU counts for May".

For the record, the May TEU statistics for the Port Authority of New York/New Jersey were posted on the Port Authority's website on July 10. By comparison, the Ports of Los Angeles and Long Beach had each published their May statistics about three weeks earlier. Incorporating the actual TEU data supplied by the largest East Coast maritime gateway, a total of 2,091,723 inbound loads arrived at the thirteen ports tracked by NRF/GPT in May, a year-over-year gain of 8.2%.

A month earlier, on June 10, the NRF/GPT had issued a mixed bag of estimates. On the one hand, it expected that the U.S. ports it covers would handle 2.09 million inbound loaded TEUs in May, for an 8.3% bump from a year earlier. But then it went on to state that "Imports of containerized goods at U.S. ports are booming, with particularly strong growth on the West Coast." Similarly, Descartes Systems Group (DSG) expected a "robust" 11.9% year over year bump in inbound loads at U.S. ports in May. DSG further reported that, while Los

Angeles would see inbound loads slip by 6.3%, the volume at Long Beach was expected to surge by 13.1%. In the end, neither source proved especially prescient about West Coast volumes.

PMSA's **West Coast Trade Report** monitors the monthly TEU numbers at 25 North American ports, twenty in the United States, three in Canada, and two in Mexico. Here's what those ports – including the Port Authority of New York/New Jersey – have reported about the container traffic they saw in May. We do not issue complete tallies until all the ports we track have posted their monthly TEU counts.

As **Exhibit 1** reveals, the U.S. ports we monitor reported handling 2,192,921 inbound loads in May, a 6.2% increase from a year earlier as well as a 10.5% increase over pre-pandemic May 2019. However, U.S. West Coast (USWC) ports saw very little gain. The 930,057 inbound loads they handled in May represented 43.0% of all inbound loads nationally in that month, down from a 45.6% share a year earlier. Inbound loads through USWC ports edged up a mere 0.2% from May 2023 and by 0.9% from May 2019. U.S. East Coast (USEC) ports, meanwhile, increased their collective share of the nation's inbound container trade to 48.9% from 47.1% in May 2023 and from 46.8% in May 2019.

On the export side of the trade ledger, **Exhibit 2** shows that the U.S. ports we track handled 997,271 outbound loaded TEUs in May, with USEC ports holding a 50.3% share of the trade

**May 2024 TEU Numbers**

Continued

while 34.3% sailed from USWC ports. The USWC share this May was down from a 38.2% share in May 2019.

As for individual ports, the **Port of Los Angeles** handled 390,663 inbound loads in May, a 4.5% fall-off from a year earlier. However, outbound loads (125,963) leapt by 23.8% from last May but remained 24.8% below the level in May 2019. Total container traffic YTD through May (3,903,734) was 3.4% higher than in the same months in pre-pandemic 2019.

At the neighboring **Port of Long Beach**, inbound loads in May amounted to 345,271 TEUs, which was also down 4.5% year-over-year. Outbound loads (100,885) plummeted by 21.1% from the previous May and were 16.3% lower than in the same month five years earlier. Total TEU volume through the San Pedro Bay gateway through May (3,448,181) was up 14.6% from the first five months of 2019.

While the two busiest West Coast container ports hardly supplied evidence of strong import growth, the **Port of Oakland** did realize a 12.9% gain in inbound loads from a year earlier. Still, outbound loads from the Northern California port in May (61,931) were off by 2.4% from a year earlier and so remained 20.7% below the export volume the port had handled in May 2019. Total TEU traffic YTD (942,720) was up 10.1% from last year and off by 10.3% from 2019.

Meanwhile, the **Northwest Seaport Alliance Ports of Tacoma and Seattle** reported 103,556 import loads in May, a sharp 32.5% jump over a year ago. Still, that left the two Washington

**Exhibit 1****May 2024  
Inbound Loads at Major North American Ports**

|                               | May 2024         | May 2023         | May 2019         | Change from 2023 | Change from 2019 |
|-------------------------------|------------------|------------------|------------------|------------------|------------------|
| Los Angeles                   | 390,663          | 409,150          | 427,789          | -4.5%            | -8.7%            |
| Long Beach                    | 345,271          | 361,661          | 290,568          | -4.5%            | 18.8%            |
| <b>San Pedro Bay Total</b>    | <b>735,934</b>   | <b>770,811</b>   | <b>718,357</b>   | <b>-4.5%</b>     | <b>2.4%</b>      |
| Oakland                       | 80,039           | 70,887           | 85,970           | 12.9%            | -6.9%            |
| NWSA                          | 103,556          | 78,151           | 111,730          | 32.5%            | -7.3%            |
| Hueneme                       | 10,528           | 7,968            | 5,557            | 32.1%            | 89.5%            |
| San Diego                     | 6,006            | 6,050            | 5,836            | -0.7%            | 2.0%             |
| <b>USWC Total</b>             | <b>930,057</b>   | <b>927,817</b>   | <b>921,614</b>   | <b>0.2%</b>      | <b>0.9%</b>      |
| Boston                        | 11,101           | 11,215           | 11,436           | -1.0%            | -2.9%            |
| NYNJ                          | 413,833          | 351,430          | 340,680          | 17.8%            | 21.5%            |
| Philadelphia                  | 35,961           | 31,434           | 27,001           | 14.4%            | 33.2%            |
| Maryland                      | 3,201            | 43,866           | 49,342           | -92.7%           | -93.5%           |
| Virginia                      | 153,701          | 129,203          | 119,592          | 19.0%            | 28.5%            |
| So Carolina                   | 91,204           | 99,130           | 88,009           | -8.0%            | 3.6%             |
| Georgia                       | 233,675          | 188,728          | 185,265          | 23.8%            | 26.1%            |
| Jaxport                       | 45,280           | 33,053           | 30,022           | 37.0%            | 50.8%            |
| Port Everglades               | 28,212           | 27,205           | 25,619           | 3.7%             | 10.1%            |
| Miami                         | 41,717           | 44,354           | 37,943           | -5.9%            | 9.9%             |
| <b>USEC Total</b>             | <b>1,057,885</b> | <b>959,618</b>   | <b>914,909</b>   | <b>10.2%</b>     | <b>15.6%</b>     |
| New Orleans                   | 10,407           | 9,592            | 12,994           | 8.5%             | -19.9%           |
| Houston                       | 164,572          | 139,745          | 107,126          | 17.8%            | 53.6%            |
| <b>USGC</b>                   | <b>174,979</b>   | <b>149,337</b>   | <b>120,120</b>   | <b>17.2%</b>     | <b>45.7%</b>     |
| Vancouver                     | 157,588          | 142,999          | 130,769          | 10.2%            | 20.5%            |
| Prince Rupert                 | 47,769           | 42,557           | 57,578           | 12.2%            | -17.0%           |
| <b>British Columbia Total</b> | <b>205,357</b>   | <b>185,556</b>   | <b>188,347</b>   | <b>10.7%</b>     | <b>9.0%</b>      |
| L Cardenas                    | 59,620           | 50,953           | 56,231           | 17.0%            | 6.0%             |
| Manzanillo                    | 137,235          | 128,698          | 110,219          | 6.6%             | 24.5%            |
| <b>Mexico Pacific Coast</b>   | <b>196,855</b>   | <b>179,651</b>   | <b>166,450</b>   | <b>9.6%</b>      | <b>18.3%</b>     |
| <b>U.S. Totals</b>            | <b>2,162,921</b> | <b>2,036,772</b> | <b>1,956,643</b> | <b>6.2%</b>      | <b>10.5%</b>     |
| <b>Top Ten</b>                | <b>1,976,514</b> | <b>1,828,085</b> | <b>1,756,729</b> | <b>8.1%</b>      | <b>12.5%</b>     |
| <b>GPT 13</b>                 | <b>2,091,723</b> | <b>1,932,697</b> | <b>1,850,313</b> | <b>8.2%</b>      | <b>13.0%</b>     |

Source Individual Ports



## May 2024 TEU Numbers

Continued

State ports 7.3% shy of the volume handled in May 2019. Outbound loads (51,607) similarly jumped by 20.8% year-over-year but even then remained 26.8% below the level set in May 2019. Total TEU moves through the NWSA ports so far this year (1,235,446) were 21.4% below the volume handled five years earlier.

Elsewhere on the Pacific Coast, British Columbia's **Port of Vancouver** recorded 157,588 inbound loads in May, up 10.2% from last year. Further north, the **Port of Prince Rupert** recorded a 12.2% year-over-year gain in inbound loads from 42,557 to 47,769 TEUs this May. Back on the U.S. side of the border, Oregon's struggling **Port of Portland** saw the arrival of 3,324 inbound loads in May, a 39.9% fall-off from a year earlier.

Along the East Coast, the **Port Authority of New York/New Jersey** processed 413,833 inbound loads in May, a year-over-year jump of 17.8% and well over what independent analysts had been anticipating. Outbound loads (124,801) were up 12.7% from the previous year but down 5.7% from May 2019. Through the first five months of the year, total loads and empties (3,501,676) were up 15.1% over the same period in 2019.

Moving south, the **Port of Virginia** handled 153,701 inbound loads in May, up 19.0% year-over-year. Outbound loads (98,687) in May were up 12.1% from both May 2023 and May 2019. Total TEU moves YTD through the Mid-Atlantic Coast gateway (1,496,566) were up 4.1% over the same months in 2019.

### Exhibit 2

### May 2024 Outbound Loads at Major North American Ports

|                               | May 2024       | May 2023       | May 2019         | Change from 2023 | Change from 2019 |
|-------------------------------|----------------|----------------|------------------|------------------|------------------|
| Los Angeles                   | 125,963        | 101,741        | 167,457          | 23.8%            | -24.8%           |
| Long Beach                    | 100,885        | 127,870        | 120,577          | -21.1%           | -16.3%           |
| <b>San Pedro Bay Total</b>    | <b>226,848</b> | <b>229,611</b> | <b>288,034</b>   | <b>-1.2%</b>     | <b>-21.2%</b>    |
| Oakland                       | 61,931         | 63,475         | 78,070           | -2.4%            | -20.7%           |
| NWSA                          | 51,607         | 42,713         | 70,541           | 20.8%            | -26.8%           |
| Hueneme                       | 1,564          | 1,522          | 1,389            | 2.8%             | 12.6%            |
| San Diego                     | 509            | 584            | 298              | -9.2%            | 70.8%            |
| <b>USWC Total</b>             | <b>342,459</b> | <b>337,905</b> | <b>438,332</b>   | <b>1.3%</b>      | <b>-21.9%</b>    |
| Boston                        | 5,273          | 5,604          | 6,853            | -5.9%            | -23.1%           |
| NYNJ                          | 124,801        | 110,695        | 132,315          | 12.7%            | -5.7%            |
| Philadelphia                  | 7,549          | 7,587          | 6,734            | -0.5%            | 12.1%            |
| Maryland                      | 1,916          | 18,772         | 19,134           | -89.8%           | -90.0%           |
| Virginia                      | 98,687         | 88,044         | 88,065           | 12.1%            | 12.1%            |
| So Carolina                   | 48,965         | 55,201         | 71,399           | -11.3%           | -31.4%           |
| Georgia                       | 120,664        | 116,247        | 126,895          | 3.8%             | -4.9%            |
| Jaxport                       | 35,774         | 50,382         | 42,180           | 29.0%            | -15.2%           |
| Port Everglades               | 36,085         | 31,443         | 35,805           | 14.8%            | 0.8%             |
| Miami                         | 22,072         | 24,133         | 35,357           | -8.5%            | -37.6%           |
| <b>USEC Total</b>             | <b>501,786</b> | <b>508,108</b> | <b>564,737</b>   | <b>-1.2%</b>     | <b>-11.1%</b>    |
| New Orleans                   | 21,336         | 17,997         | 27,757           | 18.6%            | -23.1%           |
| Houston                       | 131,690        | 109,220        | 116,693          | 20.6%            | 12.9%            |
| <b>USGC</b>                   | <b>153,026</b> | <b>127,217</b> | <b>144,450</b>   | <b>20.3%</b>     | <b>5.9%</b>      |
| Vancouver                     | 71,350         | 63,897         | 95,220           | 11.7%            | -25.1%           |
| Prince Rupert                 | 13,220         | 10,909         | 19,458           | 21.2%            | -32.1%           |
| <b>British Columbia Total</b> | <b>84,570</b>  | <b>74,806</b>  | <b>114,678</b>   | <b>13.1%</b>     | <b>-26.3%</b>    |
| L Cardenas                    | 5,708          | 3,905          | 24,104           | 46.2%            | -76.3%           |
| Manzanillo                    | 33,018         | 28,640         | 66,223           | 15.3%            | -50.1%           |
| <b>Mexico Pacific Coast</b>   | <b>38,726</b>  | <b>32,545</b>  | <b>90,327</b>    | <b>19.0%</b>     | <b>-57.1%</b>    |
| <b>U.S. Totals</b>            | <b>997,271</b> | <b>973,230</b> | <b>1,147,519</b> | <b>2.5%</b>      | <b>-13.1%</b>    |
| <b>Top Ten</b>                | <b>865,193</b> | <b>815,206</b> | <b>972,012</b>   | <b>6.1%</b>      | <b>-11.0%</b>    |

Source Individual Ports

**May 2024 TEU Numbers**

Continued

The **Port of Charleston** saw 91,204 inbound loads in May, an 8.0% fall-off from May 2023 but a 3.6% improvement over May 2019. Outbound loads (48,965) were down 11.3% from a year earlier and 31.4% below May 2019. Total TEU traffic YTD through the South Carolina port (1,022,460) was 1.5% ahead of the port's total volume in the same period five years earlier.

At the **Port of Savannah**, 233,675 inbound loads arrived in May, a 23.8% bump over the same month a year earlier and a 26.1% rise over inbound loads in May 2019. Outbound loads (120,664) at the Georgia gateway were up 3.8% year-over-year but down 4.9% from May 2019. Total container traffic YTD (2,247,008) was up 18.9% from the first five months of 2019.

On the Gulf Coast, **Port Houston** handled 164,572 inbound loads in May, 17.8% more than in the same month a year earlier and 53.6% more than in May 2019. Outbound loads at the Texas port (131,690) were up 20.6% year-over-year but just 12.9% ahead of May 2019. Total TEUs YTD (1,758,960) represented a 45.4% jump over the same period five years ago.

**Container Contents Weights and Values**

**Exhibit 4** and **Exhibit 5** display the U.S. West Coast ports' shares of the nation's containerized trade through the mainland U.S. ports against which USWC ports compete for discretionary cargo. These May 2024 data are derived from import/export documents shippers file with U.S.

**Exhibit 3****Total YTD TEU Traffic at Major North American Ports**

|                         | May 2024          | May 2023          | May 2019          | Change from 2023 | Change from 2019 |
|-------------------------|-------------------|-------------------|-------------------|------------------|------------------|
| Los Angeles             | 3,903,734         | 3,304,344         | 3,773,862         | 18.1%            | 3.4%             |
| NYNJ                    | 3,501,676         | 3,115,832         | 3,041,814         | 12.4%            | 15.1%            |
| Long Beach              | 3,448,181         | 3,125,600         | 3,008,468         | 10.3%            | 14.6%            |
| Georgia                 | 2,247,008         | 1,993,584         | 1,890,322         | 12.7%            | 18.9%            |
| Houston                 | 1,758,960         | 1,542,392         | 1,209,921         | 14.0%            | 45.4%            |
| Manzanillo              | 1,606,682         | 1,422,952         | 1,242,957         | 12.9%            | 29.3%            |
| Virginia                | 1,496,566         | 1,316,451         | 1,215,124         | 13.7%            | 4.1%             |
| Vancouver               | 1,467,270         | 1,269,742         | 1,409,784         | 15.6%            | 4.1%             |
| NWSA                    | 1,235,446         | 1,142,116         | 1,572,029         | 8.2%             | -21.4%           |
| South Carolina          | 1,022,460         | 1,022,666         | 1,007,011         | -0.02%           | 1.5%             |
| Oakland                 | 942,720           | 856,327           | 1,051,254         | 10.1%            | -10.3%           |
| Lazaro Cardenas         | 910,891           | 672,436           | 533,154           | 35.5%            | 70.8%            |
| Montreal                | 616,504           | 629,880           | 716,682           | -2.1%            | -14.0%           |
| JaxPort                 | 563,779           | 536,552           | 559,387           | 5.1%             | 0.8%             |
| Port Everglades         | 456,843           | 438,007           | 443,339           | 4.3%             | 3.4%             |
| Miami                   | 451,533           | 460,845           | 473,834           | -2.0%            | -4.7%            |
| Philadelphia            | 344,807           | 300,364           | 246,370           | 14.8%            | 40.0%            |
| Prince Rupert           | 333,496           | 317,540           | 454,406           | 5.0%             | -26.6%           |
| Maryland                | 270,004           | 453,233           | 453,248           | -40.4%           | -40.4%           |
| New Orleans             | 220,212           | 193,457           | 263,431           | 13.8%            | -16.4%           |
| Boston                  | 106,968           | 92,507            | 120,460           | 15.6%            | -11.2%           |
| Hueneme                 | 105,130           | 108,857           | 55,810            | -3.4%            | 88.4%            |
| San Diego               | 61,595            | 66,439            | 59,633            | -7.3%            | 3.3%             |
| Portland, Oregon        | 40,194            | 56,500            | 20                | -28.9%           | ∞                |
| <b>U.S. Ports Total</b> | <b>22,177,816</b> | <b>20,126,073</b> | <b>20,445,337</b> | <b>10.2%</b>     | <b>8.5%</b>      |

Source Individual Ports



## May 2024 TEU Numbers

Continued

Customs and Border Protection. For a broader perspective, we compare the most recent month for which data are available with the same month in the preceding year, in pre-pandemic 2019, and a decade earlier. For those who are inclined to add up the numbers, the USWC totals in these two exhibits include international container traffic moving through smaller West Coast ports like San Diego, Hueneme, and Everett in addition to the container figures from the USWC Big Five ports.

**Exhibit 4** shows a very modest year-over-year boost in the USWC share of all containerized import tonnage flowing into all mainland U.S. ports. Oakland was the only exception. On the export side, the five major USWC ports collectively increased their tonnage share from a year earlier, even if the San Pedro Bay ports did not.

**Exhibit 5** focuses on the USWC shares of U.S. containerized trade involving trading partners in East Asia. Again, the numbers indicate that the Ports of Los Angeles and Long Beach are capturing a slightly smaller share of the containerized import tonnage from East Asia. Oakland saw its import tonnage shares slip from a year earlier, while the Northwest Seaport Alliance Ports of Tacoma and Seattle enjoyed an appreciable gain. As for export tonnage, all major USWC ports but Oakland saw significant year-over-year gains in their shares of U.S. containerized export shipments to East Asia.

## Yes, We Have Bananas

The banana, specifically the Cavendish variety, is America's favorite fresh fruit. So sayeth the U.S. Department of Agriculture. To be sure, when including fruits that have been processed into juices, we do consume more apples and oranges. Still, for fruits that come in their own individual packaging, bananas top the popularity list. On average, we consume 13.2 pounds of bananas a year. According to Statistica, 63% of respondents in a 2022 poll reported they had purchased bananas in the past year, as opposed to 58% who bought apples and 52% who purchased grapes.

Yet, few of the bananas eaten in this country are grown here. Commercial production of bananas does occur in Hawaii, Florida, and Puerto Rico, and several other regions of the country reportedly grow bananas but almost entirely

### Exhibit 4

#### USWC Ports' Shares of Worldwide Containerized Trade via U.S. Mainland Ports, May 2024

|                |       | May 2024 | May 2023 | May 2019 | May 2014 |
|----------------|-------|----------|----------|----------|----------|
| Import Tonnage | USWC  | 34.8%    | 34.6%    | 38.6%    | 44.0%    |
|                | LA/LB | 25.6%    | 25.6%    | 27.6%    | 30.9%    |
|                | Oak.  | 3.2%     | 3.4%     | 4.0%     | 4.6%     |
|                | NWSA  | 4.4%     | 3.7%     | 5.6%     | 6.6%     |
| Import Value   | USWC  | 40.1%    | 40.9%    | 45.5%    | 52.3%    |
|                | LA/LB | 30.7%    | 31.9%    | 34.8%    | 40.1%    |
|                | Oak.  | 3.0%     | 2.9%     | 3.5%     | 4.1%     |
|                | NWSA  | 6.1%     | 6.0%     | 7.8%     | 9.1%     |
| Export Tonnage | USWC  | 32.7%    | 32.5%    | 36.0%    | 42.5%    |
|                | LA/LB | 20.4%    | 20.7%    | 22.0%    | 25.6%    |
|                | Oak.  | 5.4%     | 5.4%     | 6.1%     | 6.3%     |
|                | NWSA  | 6.1%     | 5.5%     | 7.7%     | 9.8%     |
| Export Value   | USWC  | 27.0%    | 27.8%    | 31.4%    | 35.9%    |
|                | LA/LB | 17.7%    | 18.8%    | 20.7%    | 23.9%    |
|                | Oak.  | 5.5%     | 5.1%     | 6.0%     | 5.9%     |
|                | NWSA  | 3.3%     | 3.0%     | 4.2%     | 5.5%     |

Source: U.S. Commerce Department

### Exhibit 5

#### USWC Ports' Shares of Containerized Trade with East Asia via U.S. Mainland Ports, May 2024

|                |       | May 2024 | May 2023 | May 2019 | May 2014 |
|----------------|-------|----------|----------|----------|----------|
| Import Tonnage | USWC  | 53.2%    | 53.1%    | 57.4%    | 65.7%    |
|                | LA/LB | 41.9%    | 42.1%    | 44.4%    | 48.3%    |
|                | Oak.  | 3.6%     | 3.9%     | 4.6%     | 4.7%     |
|                | NWSA  | 6.8%     | 5.7%     | 7.9%     | 10.4%    |
| Import Value   | USWC  | 61.8%    | 61.5%    | 65.9%    | 73.5%    |
|                | LA/LB | 48.7%    | 49.3%    | 51.7%    | 57.8%    |
|                | Oak.  | 3.6%     | 3.5%     | 4.0%     | 4.4%     |
|                | NWSA  | 8.3%     | 6.9%     | 9.6%     | 10.4%    |
| Export Tonnage | USWC  | 56.2%    | 54.5%    | 58.1%    | 69.2%    |
|                | LA/LB | 36.0%    | 35.2%    | 36.3%    | 43.8%    |
|                | Oak.  | 8.2%     | 8.4%     | 9.2%     | 8.7%     |
|                | NWSA  | 10.7%    | 9.8%     | 12.5%    | 15.7%    |
| Export Value   | USWC  | 57.2%    | 58.0%    | 64.4%    | 69.9%    |
|                | LA/LB | 38.2%    | 39.4%    | 43.5%    | 47.9%    |
|                | Oak.  | 10.8%    | 9.7%     | 11.1%    | 9.9%     |
|                | NWSA  | 7.5%     | 7.1%     | 8.7%     | 11.0%    |

Source: U.S. Commerce Department



## May 2024 TEU Numbers

Continued

for local markets. For the most part, though, we source our bananas abroad.

So, we thought we would look at where those bananas come from, how they get here, and which U.S. ports handle the bulk of the import trade.

As with increasing types of internationally tradeable commodities, maritime shipments of bananas have been migrating from being loaded

in bulk into the refrigerated holds of ships to refrigerated containers. As **Exhibit 6** indicates, the percentage of imported bananas traveling in containers rather than in bulk has increased from 57.7% in 2013 to 87.2% last year to 88.7% in the first five months of this year.

The transition to containerization has been particularly intense at the two gateways through which the vast majority of banana imports into West Coast ports arrive. As **Exhibit**

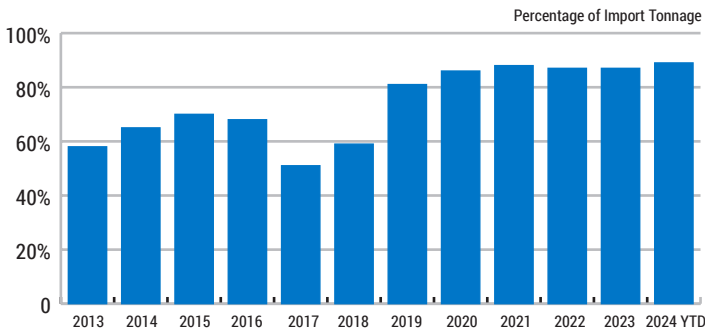
**7** displays, containerization has long been the norm for banana imports at the Port of San Diego but the shift to total containerization has been more recent at the Port of Hueneme.

**Exhibit 8** shows the five ports which collectively account for a great majority of the entire nation's banana imports.

Finally, **Exhibit 9** displays the leading sources of America's banana imports over the past decade.

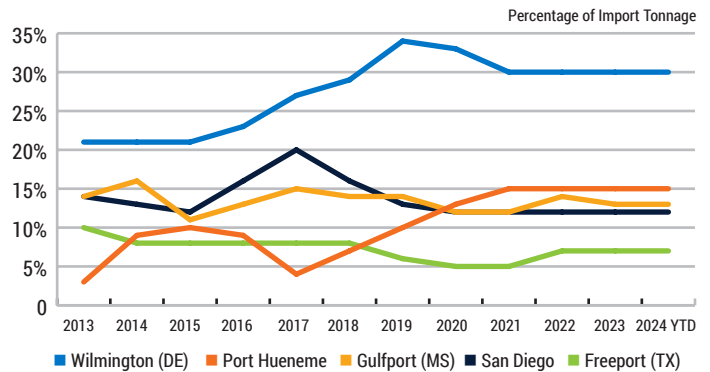
### Exhibit 6 Shift to Containerization in U.S. Banana Imports

Source: U.S. Commerce Department



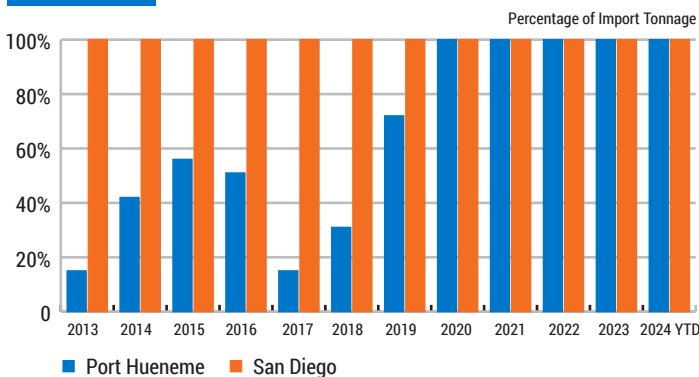
### Exhibit 8 Top Five Ports of Entry for U.S. Banana Imports

Source: U.S. Commerce Department



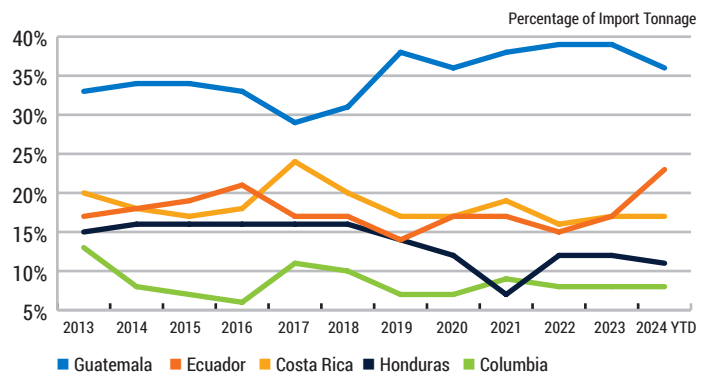
### Exhibit 7 Containerization of Banana Imports via California Ports

Source: U.S. Commerce Department



### Exhibit 9 Top Sources of U.S. Banana Imports

Source: U.S. Commerce Department





## JOCK O'CONNELL'S COMMENTARY

# The Latest Suez Crisis

Talk about asymmetrical standoffs. On one side are the naval and air forces of the world's most advanced economic, technological, and military powers. On the other side are the Houthis, one of a number of desert tribes competing for control of Yemen, a country which ranks among the world's poorest and least developed. Yet it is the latter who have caused a trillion-dollar disruption of the world's maritime trade with missile and drone attacks that have lately expanded in scope to include Israel. Meanwhile, all those hugely expensive warships and military aircraft have been unable to guarantee safe passage for commercial shipping through the Red Sea and Suez Canal.

So much for Freedom of the Seas.

Making the situation all the more irksome is that the United States Navy traces its origin to Thomas Jefferson's decision to safeguard the young nation's merchant shipping against state-sponsored pirates operating off the Barbary Coast in the Mediterranean. So in the very

early 19th century, a collection of armed sloops and schooners led by Commodores Edward Preble and Stephen Decatur successfully took the battle to the shores of Tripoli. And, if the admirals in the Pentagon need any further reminding of that noble heritage, the fleets they currently command include a brace of guided missile destroyers named *Preble* and *Decatur*.

The broad contours of the current standoff in the Red Sea are uncomfortably familiar. The Houthis are a Zaydi Shiite movement based in North Yemen that has been fighting Yemen's Sunni-majority government since 2004 and just about anyone else for even longer. Officially, they are known as Ansar Allah, and they are deadly serious about their theological beliefs. Since last fall, their advocacy for the Palestinian cause has reportedly won them new respect among young people throughout the Arab and Muslim world, much in the way Che Guevara was once celebrated in the West.

I think I first heard about the Houthis a half-century ago while I was living in London and researching my dissertation on economic constraints on British foreign and defense policy. Back then, even the Labour Government elected in October 1964 could not escape the shadow of Winston Churchill's soaring rhetoric about Britain's preeminence in global affairs. It was commonly embraced as a matter of national self-identity that their island nation rightfully deserved a seat at the top table of international diplomacy. But, as the 20th century wore on, it was becoming more and more apparent at the Ministry of Defense that the cost of maintaining a military capability commensurate with the nation's foreign policy aspirations was increasingly beyond Britain's financial means.

That was a difficult pill for official London to swallow. While the implications for the military forces were most manifest in steadily diminishing defense budgets, the broader, less easily defined implications for foreign policy took time to filter through to the Foreign Office and even longer to

## We Make Cargo Move



## The Port OF HUENEME



## Commentary

Continued

reach Downing Street. So it was that a Labour Government that came to office in late 1964, intent on continuing Britain's far-flung military commitments, came around to announcing in January 1968 that it would be abandoning the nation's historic security role in the vast region known colloquially as "East of Suez."

Among the numerous epiphanies experienced by that government was the realization that maintaining two aircraft carriers and a modest fleet of ballistic missile submarines (albeit armed with American warheads) might merit the respect of the Russians and Chinese but had almost no practical value in policing the remnants of empire, including a strategic foothold at Aden on Yemen's south coast that local hostility was making increasingly untenable.

Ever since the Houthis attacks on shipping in the Red Sea began last fall, the question dominating maritime conferences and blogs is not whether Western weaponry would eventually prevail but rather when the Houthis would decide to stand down. Since they explicitly linked their attacks on Western shipping to the conflict in Gaza, the more optimistic pundits expect the attacks to cease once a diplomatic solution is reached between Israel and Hamas.

That, unfortunately, overlooks a larger set of dynamics driving these attacks. Three questions in particular point toward a much less sanguine scenario in the Red Sea.

First, why should the Houthis stop merely because peace is restored in Gaza? In other words, did the

outbreak of fighting in Gaza simply provide a convenient pretext for attacks on Red Sea shipping that had already been planned?

Second, why would the Houthis surrender the unprecedented power they now enjoy and return to simply being an irritant to Saudi interests in the Middle East?

Third, would their sponsors permit them to stand down?

The Yemeni tribe is a proxy for Iran, which has numerous fish to fry in its troubled relationship with the West. As we have lately learned, the Iranian leadership has put Donald Trump on its hit list. And hackers associated with Iran have long been involved in cybercrimes aimed at disrupting America's infrastructure, its financial system, and its communications networks. One incident involved compromising the controls operating the Bowman Dam in Rye, New York. Just this April, the U.S. Treasury sanctioned two Iranian companies and four individuals engaged in "malicious cyber activity" that targeted more than a dozen American businesses and government entities.

A July 10th report from the U.S. Defense Intelligence Agency (DIA) documents the assistance the Houthis have been getting from Iran as well as U.S. and allied efforts to interrupt that flow of arms. Critical components of missiles that have been seized have been found to share near-identical features with Iranian missile systems. Between 2015 and 2024, the U.S. and its partners have interdicted at least 20 Iranian smuggling vessels, seizing

ballistic, cruise, and surface-to-air missile components, antitank guided missiles, unmanned aerial vehicles, and other illicit weapons destined for the Houthis. The DIA calculates the Houthis have used Iran-supplied weapons to conduct more than 100 land- and sea-based attacks across the Middle East, the Red Sea, and the Gulf of Aden.

The economic damage Iranian rockets fired by the Houthis can inflict serves the broader interests of Tehran in a way that avoids direct confrontation with American and allied forces.

Similarly, the standoff between the Houthis and the U.S. Navy offers U.S. adversaries around the world a low-risk means of testing their latest offensive weaponry and tactics against the defensive capabilities of America's naval forces. We can only imagine how much Russian and Chinese naval intelligence have already gleaned from observing how the U.S. Navy responds to attacks by rockets and, increasingly, by unpiloted drones.

Ultimately, the whole dismal situation in the Red Sea should serve as a potent reminder to Western governments—and to the world's shipping industry—that Freedom of the Seas can be maintained only with very substantial investments and occasional sacrifices. As we are seeing, a long cherished concept we thought we were defending is no longer the normal state of affairs.

*Jock's views are his own and do not necessarily reflect those of PMSA.*



## The High Price of Our Container Market Share Decline

By Mike Jacob, President, Pacific Merchant Shipping Association

Anecdotally, we are all familiar with the benefits of trade. They are direct and personal, as well as broad and regional. When containers are moved through our West Coast ports, jobs for individuals are created, and the economy and tax revenues grow. But, when these containers bypass our ports and instead go to competitors, like those in Houston, Savannah, or British Columbia, they take these jobs, and their economic activity and tax revenues with them.

One of the most pervasive and consistent trends facing West Coast seaports since 2006 has been our loss of containerized market share to these competitors. While ports across North America were growing their market share at our expense and logging double- and triple-digit rates of growth, even after accounting for the impacts of the Great Recession and the pandemic, total container volumes lagged in our portion of the transpacific trade.

Specifically, after 17 years, when compared to 2006, volumes in 2023 at the Ports of Los Angeles and Long Beach grew only 6% or roughly at a

compound annual growth rate of just over 0.3% per year. When comparing 2006 to 2019 volumes, taking out the boom and bust of the pandemic container cycle, the compound annual growth rate for the San Pedro Bay ports was still just under 0.7% per year. By contrast, the Port of Savannah from 2006 to 2019 grew at a 113% clip, and through 2023 by 128%, at a compound annual growth rate of 5% -- that's 7x faster. Per year.

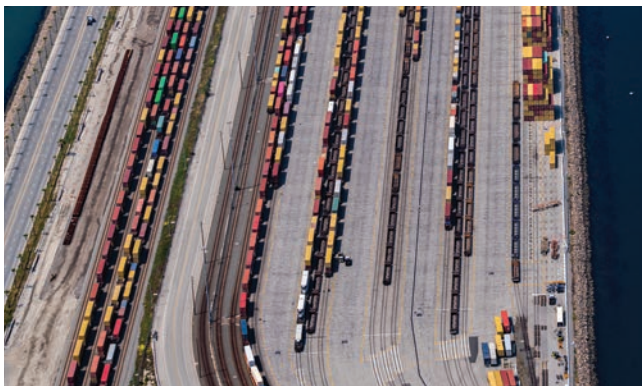
Over this same period of time, another pervasive and consistent challenge has been to effectively measure, characterize, and quantify the many significant opportunity costs that have resulted in West Coast communities as a result of this lost growth. A recent economic impact study completed by the California Center for Jobs & the Economy, entitled the "Economic Importance of Trade & the Ports to Southern California," has put together a comprehensive analysis which has quantified these costs that resulted from the impacts of reduced market share.

If we had been able to maintain our 2006 market share in 2022, our cargo

volumes would have been 23% higher. The economic impacts from our reduced market share, which are the opportunity costs of lost containers from Asia that are going to competitors, are dramatic:

- Annual loss of 45,400 jobs in Southern California
- Annual lost income for workers of \$3.86 billion – this equals a cumulative loss of income to Southern Californians since 2006 of \$30.9 billion (in 2022 dollars)
- Annual total economic value added to the Southern California economy of \$5.48 billion – equal to a cumulative loss since 2006 of \$43.8 billion
- Annual total economic output in Southern California is \$9.67 billion – equivalent to a cumulative loss to the Southern California economic output since 2006 of \$77.4 billion

And, it isn't just workers losing wages and the economy losing activity that results from the diversion of cargo, but one of the unintended consequences is a significant reduction in total state and local tax revenues.



## Making Tracks

Our Pier B On-Dock Rail Support Facility will increase throughput, lower emissions, lessen traffic impacts and move cargo faster and more efficiently.



Port of **LONG BEACH**  
THE PORT OF CHOICE



## The High Price

Continued

These revenues are derivative of workers' wages and economic activity:

- Annual loss of state and local tax revenue of \$560.9 million in 2022
- Total cumulative losses of state and local tax revenues of \$4.5 billion since 2006

And, as significant as these cumulative impacts and losses are, when one considers the demographics of where these negative job and income impacts are concentrated, the key economic findings reveal that these opportunity costs are even more substantive. When we lose cargo, these impacts of lost income, lost jobs, and lost economic opportunity are not spread evenly across all demographics, rather they hit blue collar, middle class, latino, and immigrant households the hardest:

- Trade jobs are one of the region's most significant source of middle-class jobs for lower-skilled workers, with 2/3 of jobs in the Southern California trade cluster only requiring a high school diploma or less.
- Trade jobs are the second-largest source of jobs for Latinos in Southern California.
- 41.5% of trade workers in Southern California are immigrants, compared to an overall regional average of 34.6% of workers.

As we continue to move forward with

policymaking in the trade, logistics, and supply chain, it is imperative that we start making the case for the economic benefits of growing the volume of trade at our San Pedro Bay Ports. Not only do we facilitate the generation of additional port revenue to pay for infrastructure for both freight transportation and environmental improvements at the ports, but we create jobs, economic activity, and new tax revenues throughout the entire economy. Otherwise, we leave these benefits to our competitors, who are not just diverting a container away from our ports, but diverting a healthy and growing economy away from Southern Californians.

To read or download a copy of the full "Economic Importance of Trade & the Ports to Southern California," by the California Center for Jobs & the Economy, please visit [www.centerfor-jobs.org/ca/special-reports](http://www.centerfor-jobs.org/ca/special-reports).

## NUMBER OF THE MONTH

# \$4.5 Billion

**TOTAL CUMULATIVE LOSSES OF STATE AND LOCAL TAX REVENUES IN SOUTHERN CALIFORNIA SINCE 2006 ASSOCIATED WITH THE LOSS OF PORT MARKETSHARE.**

### Containerized Market Share by Weight: Total

Source: USATrade Online, exports and imports

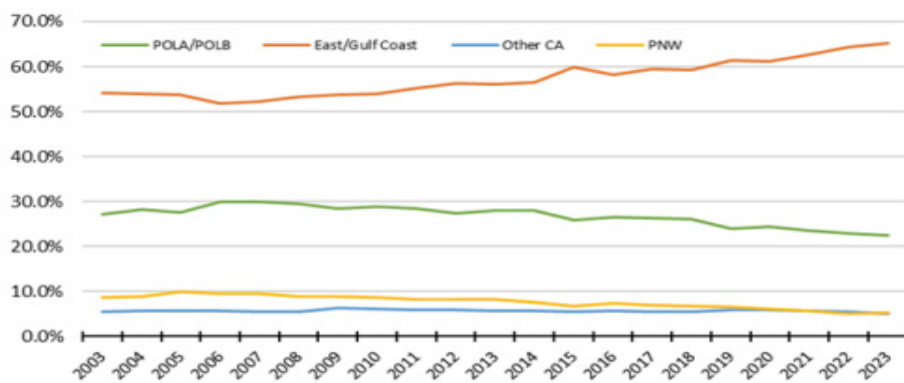


Figure 7: Ports Containerized Cargo Market Share, Total in the Economic Importance of Trade & the Ports to Southern California Study by the Center for Jobs and the Economy.

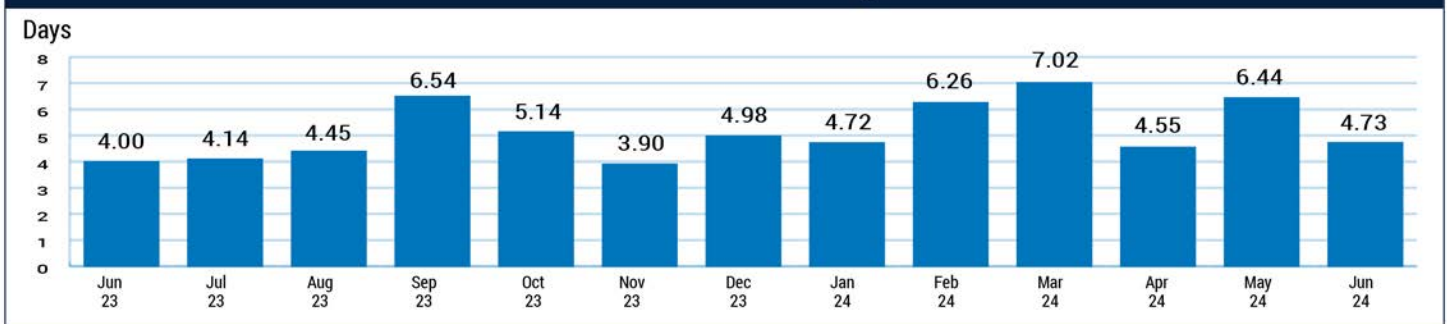


## Truck Container Dwell Time Remains Steady & Rail Dwell Time Sees Improvement in June

### San Pedro Bay Weighted Average Inbound Laden Truck Container Dwell Time in Days



### Rail Dwell Time in Days



### Rail Dwell Time in Days % > 5 Days



### Dwell Time in Days % > 5 Days



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# **Puget Sound Pilotage District Authorized Number of Pilots**

## **BPC Staff Recommendation: 60**

### **STAFF RECOMMENDATION**

BPC staff have reviewed the submittals from Parties of Interest received July 10, 2024, and recommend setting the Authorized Number of Pilots at 60, based on available data, trends in assignment levels, and expected retirements (both mandatory and elective retirements).

### **CONTENTS**

|           |                                                                                                                                                                                                                                                                                                                                                                                                     |
|-----------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Pages 1-3 | Review of submittals: <ul style="list-style-type: none"><li>• Main points of submittals are summarized, with BPC comments.<ul style="list-style-type: none"><li>~ PMSA &amp; PSP pilotage demand forecasts</li><li>~ PMSA &amp; PSP suggested number of authorized pilots</li><li>~ PSP supporting arguments</li><li>~ PMSA supporting arguments (including 13 recommendations)</li></ul></li></ul> |
| Page 4    | Table 1 <ul style="list-style-type: none"><li>• Forecasting annual assignments</li><li>• Converting forecasted annual assignments to a range of number of pilots</li></ul>                                                                                                                                                                                                                          |
| Page 5    | Table 2 <ul style="list-style-type: none"><li>• Converting number of pilots to a range of number of assignments</li></ul>                                                                                                                                                                                                                                                                           |

| ISSUE                                                                          | PMSA SUBMITTAL                                                                                                                                                                                                                                                                                                                | PSP SUBMITTAL                                                                                                                                                                                                                                                                                               | BPC STAFF COMMENT                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
|--------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| PMSA & PSP<br><br>Pilotage demand forecast                                     | On page 1 of submittal: <ul style="list-style-type: none"> <li>Multiple years of data preferred</li> <li>Note current demand is comparable to 7483 jobs in 2022</li> <li>Average of 2017, 2018, 2019, 2022, and 2023 annual assignments (5 years, excluding 2020 and 2021)</li> </ul> <p>= <b>7209</b> annual assignments</p> | On page 4 of submittal: <ul style="list-style-type: none"> <li>Single year of data preferred (trailing 12 months)</li> <li>Trailing 12 months assignments (July 2023 thru June 2024) total 7634</li> <li>Subtract 104 for known service change per NWSA.</li> </ul> <p>= <b>7530</b> annual assignments</p> | Forecasting based on past data is a method that is commonly used, with the caveat that past data cannot predict future demand with certainty. Also, there is some arbitrariness in selecting which past data to use (good arguments can be made for a variety of choices). <b>SEE TABLE 1</b> for more info about annual assignment forecast.                                                                                                                                                                                  |
| PMSA & PSP<br><br>Suggested number of pilots                                   | $57 (7209/129.15 = 55.8 \text{ pilots, plus 1 for president.})$                                                                                                                                                                                                                                                               | $62 (7530/ 129.15 = 58.3 \text{ pilots not including president} = 60 \text{ pilots when NFFD and president are factored in. increase from 56 to 60 plus 2 more to resolve accumulated callbacks})$<br>.                                                                                                     | Both PSP and PMSA forecast annual assignments and then assume 95% of the demand will be met by pilots working on watch and 5% will be met by pilots working callbacks. Note that BPC seeks to <i>limit</i> callbacks to 5%, not <i>require</i> 5% callbacks.<br><br>PMSA calculation omits consideration of NFFD. Need to add 1 more for average NFFD. <b>CORRECTED TOTAL 58.</b>                                                                                                                                              |
| PSP supporting arguments                                                       |                                                                                                                                                                                                                                                                                                                               | +4 Supported using TAL arithmetic above, following WAC elements and requirements<br><br>+2 Supported by consultant recommend.                                                                                                                                                                               | If a range of forecasted assignments is considered, then a higher number of pilots might need to be considered. <b>SEE TABLES 1 &amp; 2.</b>                                                                                                                                                                                                                                                                                                                                                                                   |
| PSP CONCLUSION/ OTHER COMMENT                                                  |                                                                                                                                                                                                                                                                                                                               | Request for annual review of authorized number of pilots.                                                                                                                                                                                                                                                   | BPC continues to monitor assignment levels and regulatory changes. Biennial review is an appropriate frequency.                                                                                                                                                                                                                                                                                                                                                                                                                |
| PMSA 1st argument<br><br>Category: <b>UNDERLYING ASSUMPTIONS/ CALCULATIONS</b> | Current pilot supply exceeds demand if comparing daily assignment count to number of licensed pilots, assuming half on watch each day, assuming assignments consume 1.0 on watch days.                                                                                                                                        |                                                                                                                                                                                                                                                                                                             | TAL analysis found ~1.4 on watch days per on watch assignment so this 1:1 assumption is flawed. BPC staff reject PMSA's continued claims that pilots work fewer on watch days than scheduled and note the 1.4-day figure includes essential service activities and rest requirements, as well as times when no assignment is available.                                                                                                                                                                                        |
| PMSA 2nd argument<br><br>Category: <b>UNDERLYING ASSUMPTIONS/ CALCULATIONS</b> | TAL (on watch) plus 5% callbacks = 129.15 assigns per pilot per year<br><br>PMSA forecast = 7209 annual assignments<br>= 56 pilots (not including president).<br>Total 57 with president, an increase of 1.                                                                                                                   |                                                                                                                                                                                                                                                                                                             | <b>SEE TABLE 2.</b> BPC seeks to <i>limit</i> callbacks to 5%, not <i>require</i> 5% callbacks. Recommend that annual assignment forecasts utilize the <i>range</i> between 0% and 5% callbacks to factor in some wiggle room. (Both PMSA and PSP submittals assume 5% callback rate to meet the assignment forecast. If actual assignments are higher, then greater than 5% callbacks will be required.)<br><br>PMSA calculation omits consideration of NFFD. Need to add 1 more for average NFFD. <b>CORRECTED TOTAL 58.</b> |

| ISSUE                                                                                    | PMSA SUBMITTAL                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | PSP SUBMITTAL | BPC STAFF COMMENT                                                                                                                                                                                                                                                                                                                                                            |
|------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| PMSA 3rd argument<br><br>Category:<br>INSUFFICIENT<br>OVERSIGHT & DATA                   | Supply and demand impacts of pilots not working their watch schedule.<br><b>Rec 1:</b> daily reporting<br><b>Rec 2:</b> improved data, more focused on changing factors & need for pilots                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |               | Daily reporting is a monumental and costly undertaking, with no identified benefit.<br><br>BPC staff monitor factors that necessitate adjustment in authorized number of pilots (see dashboards).                                                                                                                                                                            |
| PMSA 4th argument<br><br>Category:<br>INSUFFICIENT<br>OVERSIGHT & DATA                   | BPC should monitor watchstanding. Inconsistent of BPC to look at pilot on watch availability but not verify pilots are working.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |               | BPC staff note that Puget Sound Pilots provide detailed monthly reports (which BPC shares with PMSA) of both revenue activity (pilotage assignments) and nonrevenue activity (essential service activity such as training, upgrade trips, and meetings). BPC staff have not observed pilots failing to comply with watchstanding schedules or PSP rules concerning time off. |
| PMSA 5th argument<br><br>Category:<br>INSUFFICIENT<br>OVERSIGHT & DATA<br>also COMP DAYS | Pilot utilization rate, pilots not working their watch schedule and/or taking comp days at inopportune times, insufficient oversight.<br><b>Rec 3:</b> Current on watch utilization 68% (123 assigns per 180.65 days). BPC should evaluate if this is acceptable efficiency.<br><b>Rec 4:</b> add 2 duty days (increase PPW to 5 days instead of 3)<br><b>Rec 5:</b> Adjust watch schedules to have more summer days on watch<br><b>Rec 6:</b> Adjust watch schedules to have more peak days of week on watch<br><b>Rec 7:</b> Change day shouldn't be all day<br><b>Rec 8:</b> Track when callbacks are created by comp days.<br><b>Rec 9:</b> Pay attention to effect of more pilots on comp day accumulation. |               | BPC staff continue to monitor effects of improved pilot staffing on comp day accumulation and callbacks, as well as the effects of a less stressed system in general.<br><br>BPC staff recommend no changes to PSP watch schedule at this time, especially since the schedule was extensively overhauled recently.                                                           |
| PMSA 6th argument<br><br>Category:<br>INSUFFICIENT<br>OVERSIGHT & DATA<br>also COMP DAYS | If pilot licenses increase, then comp day backlog should decrease. BPC should analyze relationship between number of pilots, number of assignments, number of comp days, and number of callbacks. (NFFD status also factors in.)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |               | BPC staff continue to monitor effects of improved pilot staffing on comp day accumulation and callbacks, as well as the effects of a less stressed system in general.                                                                                                                                                                                                        |

| ISSUE                                                                               | PMSA SUBMITTAL                                                                                                                                                                                                                                                                                                                                            | PSP SUBMITTAL | BPC STAFF COMMENT                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
|-------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p>PMSA 7th argument</p> <p>Category:<br/>INSUFFICIENT<br/>OVERSIGHT &amp; DATA</p> | <p>BPC should monitor pilot watchstanding in more detail.</p> <p><b>Rec 10:</b> report if pilot on watch but not avail.</p> <p><b>Rec 11:</b> compare daily assigns &amp; avail pilots and analyze reasons for shortages</p> <p><b>Rec 12:</b> analyze days with multiple assigns to determine on watch days worked rather than count of assignments.</p> |               | <p>Daily reporting is a monumental and costly undertaking, with no identified benefit.</p> <p>BPC staff monitor factors that necessitate adjustment in authorized number of pilots (see dashboards).</p> <p>BPC staff note that Puget Sound Pilots provide detailed monthly reports (which BPC shares with PMSA) of both revenue activity (pilotage assignments) and nonrevenue activity (essential service activity such as training, upgrade trips, and meetings). BPC staff have not observed pilots failing to comply with watchstanding schedules or PSP rules concerning time off.</p>                                                                                      |
| <p>PMSA 8th argument</p> <p>Category:<br/>INSUFFICIENT<br/>OVERSIGHT &amp; DATA</p> | <p>BPC should monitor nonrevenue activities more closely</p> <p><b>Rec 13:</b> ensure that on/off watch split is acceptable and that short meetings aren't causing pilots to be unavailable all day.</p>                                                                                                                                                  |               | <p>BPC staff note that this information is available on the PSP Activity report.</p> <p>Daily reporting is a monumental and costly undertaking, with no identified benefit.</p> <p>BPC staff monitor factors that necessitate adjustment in authorized number of pilots (see dashboards).</p> <p>BPC staff note that Puget Sound Pilots provide detailed monthly reports (which BPC shares with PMSA) of both revenue activity (pilotage assignments) and nonrevenue activity (essential service activity such as training, upgrade trips, and meetings). BPC staff have not observed pilots failing to comply with watchstanding schedules or PSP rules concerning time off.</p> |
| <p>PMSA CONCLUSION/<br/>OTHER COMMENT</p>                                           | <p>An increase in number of pilot licenses is not reasonable without more data/proof showing pilots are working when they are scheduled and working efficiently.</p> <p>Any changes should be made incrementally/conservatively.</p>                                                                                                                      |               | <p>BPC staff support increasing the number of pilots to reduce the number of off watch assignments and observe how the system functions in a less stressed state. Information gathered will be applied each time the Number of Authorized Pilots is reconsidered.</p> <p>Increasing from 56 to 60 is a conservative increase (arguments can be made for a higher number to create wiggle room around the assignment forecast, and/or to more aggressively resolve the comp day backlog).</p>                                                                                                                                                                                      |

**TABLE 1 – Examples of annual assignment forecasting based on different included/excluded data  
& Number of pilots calculations for each example**

This shows the PMSA forecast and the PSP forecast for annual assignments, with other alternative forecasts in between. All are based on past data.

The purpose here is to show the different numbers that can be arrived at, and to demonstrate that forecasting can be rather arbitrary.

Below the examples of forecasts, the required number of pilots for each forecast is calculated, based on 0% callbacks, 2.5% callbacks, and 5% callbacks.

Callback % = trailing 12 months callbacks divided by assigns. Months may have more or fewer callbacks. Pilots may work more or fewer callbacks.

| <u>Year of<br/>Source Data</u>                                             | <u>PMSA<br/>assignment<br/>forecast</u>                             | <u>BPC alt 1<br/>assignment<br/>forecast</u>                        | <u>BPC alt 2<br/>assignment<br/>forecast</u>                         | <u>BPC alt 3<br/>assignment<br/>forecast</u>                      | <u>BPC alt 4<br/>assignment<br/>forecast</u> | <u>BPC alt 5<br/>assignment<br/>forecast</u>                                                             | <u>PSP<br/>assignment<br/>forecast</u>                             | THIS<br>SECTION<br>EXPLAINS<br>HOW THE<br>DIFFERENT<br>FORECASTS<br>WERE<br>ARRIVED AT<br>(OR COULD<br>HAVE BEEN)                     |
|----------------------------------------------------------------------------|---------------------------------------------------------------------|---------------------------------------------------------------------|----------------------------------------------------------------------|-------------------------------------------------------------------|----------------------------------------------|----------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------|
| 2017*                                                                      | 7240                                                                |                                                                     |                                                                      |                                                                   |                                              |                                                                                                          |                                                                    |                                                                                                                                       |
| 2018*                                                                      | 7321                                                                |                                                                     |                                                                      |                                                                   |                                              |                                                                                                          |                                                                    |                                                                                                                                       |
| 2019                                                                       | 6971                                                                | 6971                                                                | 6971                                                                 | 6971                                                              |                                              |                                                                                                          |                                                                    |                                                                                                                                       |
| 2020                                                                       |                                                                     | 6072                                                                |                                                                      |                                                                   |                                              |                                                                                                          |                                                                    |                                                                                                                                       |
| 2021                                                                       |                                                                     | 6950                                                                | 6950                                                                 |                                                                   |                                              |                                                                                                          |                                                                    |                                                                                                                                       |
| 2022                                                                       | 7483                                                                | 7483                                                                | 7483                                                                 | 7483                                                              | 7483                                         | 7483                                                                                                     |                                                                    |                                                                                                                                       |
| 2023                                                                       | 7031                                                                | 7031                                                                | 7031                                                                 | 7031                                                              | 7031                                         | 7031                                                                                                     |                                                                    |                                                                                                                                       |
| 2024                                                                       |                                                                     |                                                                     |                                                                      |                                                                   |                                              | 7778                                                                                                     |                                                                    |                                                                                                                                       |
| *note BPC<br>requested<br>submittals not<br>include data<br>prior to 2019. | 7,209                                                               | 6,901                                                               | 7,109                                                                | 7,162                                                             | 7,257                                        | 7,431                                                                                                    | 7,530                                                              | THIS<br>SECTION<br>CALCULATES<br>THE NUMBER<br>OF PILOTS<br>REQUIRED<br>FOR EACH<br>FORECAST<br>GIVEN<br>VARIOUS<br>CALLBACK<br>RATES |
|                                                                            | average of<br>last 7 years<br>excluding<br>covid years<br>2020-2021 | average of<br>last 5 years<br>2019-2023<br>including<br>covid years | average of<br>last 5 years<br>2019-2023<br>excluding<br>2020 (covid) | average of<br>last 5 years<br>2019-2023<br>excluding<br>2020-2021 | average of<br>last 2 years<br>2022 & 2023    | average of<br>last 2 years<br>+ estimated<br>current year<br><i>assumes Jan-Jun<br/>equal to Jul-Dec</i> | total of<br>trailing<br>12 months<br>adjusted for<br>known changes |                                                                                                                                       |
| assigns per pilot<br>@ 0% callbacks                                        | 123                                                                 | 123                                                                 | 123                                                                  | 123                                                               | 123                                          | 123                                                                                                      | 123                                                                |                                                                                                                                       |
| # pilots required,<br>excl. prez & nffd                                    | 59                                                                  | 56                                                                  | 58                                                                   | 58                                                                | 59                                           | 60                                                                                                       | 61                                                                 |                                                                                                                                       |
| + 2 for prez+nffd                                                          | 61                                                                  | 58                                                                  | 60                                                                   | 60                                                                | 61                                           | 62                                                                                                       | 63                                                                 | THIS<br>SECTION<br>CALCULATES<br>THE NUMBER<br>OF PILOTS<br>REQUIRED<br>FOR EACH<br>FORECAST<br>GIVEN<br>VARIOUS<br>CALLBACK<br>RATES |
| assigns per pilot<br>@ 2.5% callbacks                                      | 126                                                                 | 126                                                                 | 126                                                                  | 126                                                               | 126                                          | 126                                                                                                      | 126                                                                |                                                                                                                                       |
| # pilots required,<br>excl. prez & nffd                                    | 57                                                                  | 55                                                                  | 56                                                                   | 57                                                                | 58                                           | 59                                                                                                       | 60                                                                 |                                                                                                                                       |
| + 2 for prez+nffd                                                          | 59                                                                  | 57                                                                  | 58                                                                   | 59                                                                | 60                                           | 61                                                                                                       | 62                                                                 |                                                                                                                                       |
| assigns per pilot<br>@ 5% callbacks                                        | 129                                                                 | 129                                                                 | 129                                                                  | 129                                                               | 129                                          | 129                                                                                                      | 129                                                                | THIS<br>SECTION<br>CALCULATES<br>THE NUMBER<br>OF PILOTS<br>REQUIRED<br>FOR EACH<br>FORECAST<br>GIVEN<br>VARIOUS<br>CALLBACK<br>RATES |
| # pilots required,<br>excl. prez & nffd                                    | 56                                                                  | 53                                                                  | 55                                                                   | 56                                                                | 56                                           | 58                                                                                                       | 58                                                                 |                                                                                                                                       |
| + 2 for prez+nffd                                                          | 58                                                                  | 55                                                                  | 57                                                                   | 58                                                                | 58                                           | 60                                                                                                       | 60                                                                 |                                                                                                                                       |

**TABLE 2 – Range of annual assignments calculations for different numbers of licenses**

This table shows, for each hypothetical number of pilots, the **range** of annual assignments that can be done, assuming 129 annual assignments per pilot per year at the top of the range (5% callbacks) and 123 annual assignments per pilot per year at the bottom of the range (0% callbacks).

Aiming for the top of the range (as both submittals have done) may underestimate number of pilots and result in excessive callbacks.

Aiming for the middle of the range leaves wiggle room on both sides but would increase the number of pilots required.

Callback % = trailing 12 months callbacks divided by assigns. Months may have more or fewer callbacks. Pilots may work more or fewer callbacks.

|                                                         |                                           |             |             |             |             |             |             |             |             |             |
|---------------------------------------------------------|-------------------------------------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|
| <b>POSSIBLE<br/>NUMBER OF<br/>AUTHORIZED<br/>PILOTS</b> | president                                 | 1           | 1           | 1           | 1           | 1           | 1           | 1           | 1           | 1           |
|                                                         | NFFD (average all pilots 2019-2023)       | 1           | 1           | 1           | 1           | 1           | 1           | 1           | 1           | 1           |
|                                                         | current licenses (56 minus NFFD & Prez)   | 54          | 54          | 54          | 54          | 54          | 54          | 54          | 54          | 54          |
|                                                         | <b>+ additional licenses</b>              | <b>+0</b>   | <b>+1</b>   | <b>+2</b>   | <b>+3</b>   | <b>+4</b>   | <b>+5</b>   | <b>+6</b>   | <b>+7</b>   | <b>+8</b>   |
|                                                         | <b>TOTAL<br/>LICENSES</b>                 | <b>56</b>   | <b>57</b>   | <b>58</b>   | <b>59</b>   | <b>60</b>   | <b>61</b>   | <b>62</b>   | <b>63</b>   | <b>64</b>   |
|                                                         | working pilots (total minus NFFD & prez)  | 54          | 55          | 56          | 57          | 58          | 59          | 60          | 61          | 62          |
| <b>RANGES OF<br/>ANNUAL<br/>ASSIGNMENT<br/>CAPACITY</b> | Max = 105% TAL (129 assigns/pilot/year)   | <b>6974</b> | <b>7103</b> | <b>7232</b> | <b>7362</b> | <b>7491</b> | <b>7620</b> | <b>7749</b> | <b>7878</b> | <b>8007</b> |
|                                                         | Mid = 102.5% TAL (126 assigns/pilot/year) | <b>6808</b> | <b>6934</b> | <b>7060</b> | <b>7186</b> | <b>7312</b> | <b>7438</b> | <b>7565</b> | <b>7691</b> | <b>7817</b> |
|                                                         | Min = 100% TAL (123 assigns/pilot/year)   | <b>6642</b> | <b>6765</b> | <b>6888</b> | <b>7011</b> | <b>7134</b> | <b>7257</b> | <b>7380</b> | <b>7503</b> | <b>7626</b> |
|                                                         | max-min difference (range)                | 332         | 338         | 344         | 351         | 357         | 363         | 369         | 375         | 381         |

(CIRCLED NUMBERS ARE CLOSEST  
TO FORECASTED NUMBERS)

PMSA annual assignment forecast is **7209**  
PMSA suggested number of pilots is **58\***

PSP annual assignment forecast is **7530**  
PSP suggested number of pilots is **60\*\***

Both submittals aim for the **top of the range** of assignments per pilot per year (5% callbacks).

Aiming for **middle of range** allows margin of error **above** and **below** forecast but increases number of pilots required.

\*Includes additional pilot for NFFD average.

\*\*Does not include PSP request for additional pilots to resolve comp day backlog.



STATE OF WASHINGTON  
**BOARD OF PILOTAGE COMMISSIONERS**

2901 Third Avenue, Suite 500 | Seattle, Washington 98121 | (206) 515-3904 | [www.pilotage.wa.gov](http://www.pilotage.wa.gov)

**Meeting Minutes – Pilot Safety Committee (PSC)**

May 6, 2024, 10:00 AM

**Attendees:** John Scragg (PSP), Andrew Drennen (BPC), Ryan Leo (PGH), Sheri Tonn (BPC), Jaimie Bever (BPC), Eleanor Kirtley (BPC), Mike Moore (PMSA), Ivan Carlson (PSP), Scott Anacker (PSP), Jason Hamilton (BPC), Ivan Carlson (PSP), Charlie Costanzo (PSP), Bettina Maki (BPC)

**1. Review of Minutes of previous meeting on January 8.**

The minutes were approved with minor corrections.

**2. Noncompliant Pilot Transfer Arrangements**

Pilots' reports of noncompliant transfer arrangements from the 1st quarter of 2024 were reviewed and discussed, as well as the Jotform data summary of the reports. The data summary will be shared with the Board.

Scott Anacker shared some of the things that Matt Hannuksela has learned about the flurry of noncompliant ladder certifications. He noted that some manufacturers have been placing the placards on the wrong part of the ladder (not complying with ISO standard). There have also been cases where the certificate has not stayed with the ladder, and cases where there has been one certificate for multiple ladders (each piece of safety equipment should have its own certificate). He also mentioned that ISO standard 799 is being updated and "grandfathering" will be completely phased out.

Ryan Leo shared that Grays Harbor has added SEAiq PPUs to their pilot boats and are able to "Virtually Board" vessels. This is especially useful when requesting changes to an improperly rigged transfer arrangement, because it allows them to monitor changing boarding conditions during the time it takes to re-rig the ladder.

**3. Rest Rule Exceptions**

During 2024 Q1 in Grays Harbor there were zero (0) rest exceptions.

During 2024 Q1 in Puget Sound there were five (5) rest exceptions – one assignment combination that exceeded 13 hours duration and four exceptions to the 10 hour rest rule. One of the four exceptions to the 10 hour rest rule may have just been the result of a typo in the call time and the other three were the result of pilots arriving a few minutes early at the pilot boat.

#### **4. MSO form categories revision**

Bettina shared some data she had gathered about MSO categories in an effort to understand why 40% of MSO reports do not have a category selected (examples of categories on the MSO form are “Close Aboard Associated With Traffic Density” and “Docking Difficulty Associated with Equipment Malfunction”). She shared some draft changes to the MSO form (also focused on category options) but more work is needed, preferably with input from a pilot. One change already being made with the existing form is to include additional info in the file name if an MSO is *not* describing an issue with the piloted vessel but rather a problem with another vessel or extraneous situation (such as terminal cranes). There was discussion of how detailed the categories should be and whether it might be possible to change from a PDF form to an HTML form (e.g. Jotform) that would enable automated data gathering and summarizing.

#### **5. Port of Grays Harbor Joint Training with USCG**

Ryan Leo gave a very interesting presentation on the USCG and Port of Grays Harbor joint safety exercise done in February. It was a significant undertaking that included Pilots, PGH Staff and Pilot boat crews, approximately 20 USCG members from the USCG Station Grays Harbor and helicopter crew members who had flown up from the Astoria Air Station for the training. A USCG rescue swimmer was also included in the drill.

This was the first time the groups had done a safety exercise together. More coordinated drills are planned. The Coast Guard was able to learn a lot about pilotage operations (which they were unfamiliar with) and PGH pilots were able learn about USCG rescue capabilities and response times (45 minutes for a Coast Guard vessel and 1 hour for a Coast Guard helicopter), and how to work together and communicate during a rescue operation. As result of this drill, it was determined that two deckhands are needed on the pilot boat *CHEHALIS* during winter weather as it would not be possible for one deckhand to retrieve a person from the water.

Safety equipment was reviewed as part of the drill. Grays Harbor has acquired new Personal Locator Beacons with AIS functionality and are having new float coats made and have acquired a rescue dummy. They are developing a training matrix and are making significant progress at increasing the frequency of trainings and drills.

#### **6. USCG Policy Letter April 10, 2024 – Guidance Regarding Devices That Alter Maneuvering Characteristics of Ships to Ensure Safe Operation in Waters of the United States**

This USCG memo emphasizes that ships with engine limiters installed must disclose this to the pilot and have an updated maneuvering card. As efforts to control emissions ramp up, it will be important to have consistent ways of documenting and communicating a ship’s capabilities, and systems for tracking any associated safety occurrences. Ivan Carlson shared the questions that pilots ask about fuel limiters, which include: 1) is vessel equipped with an engine limiter, 2) is it electronic or mechanical, 3) will it be disabled for the transit, 4) how much time is required to disable it. These questions are included on every PSP job sheet.

**The first half of the meeting ended at 11:00, and the second half of the meeting (documented separately) focused on TAL determination and adjourned at 12:00.**

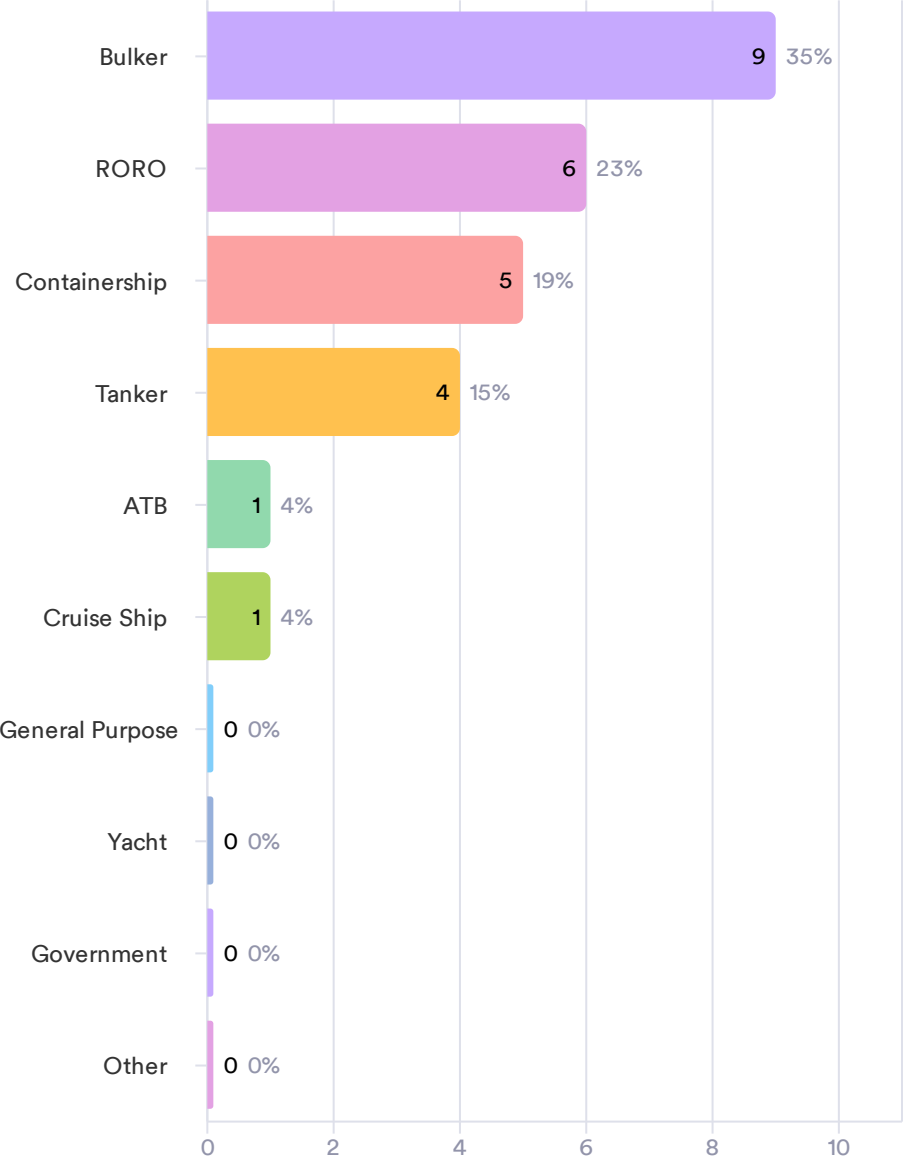
# Pilot Ladder Safety Summary

Washington State (PS & GH 4/1/24 - 6/30/24)

# Pilot Ladder Safety Report

## Vessel Type:

26 Responses



## Vessel Name:

26 Responses

| Data              | Responses |
|-------------------|-----------|
| Cosmic Ace        | 2         |
| Liberty King      | 2         |
| MV Mystras        | 1         |
| Capetian Costas S | 1         |
| Andromeda Spirit  | 1         |
| Global Round      | 1         |
| Ken Haru          | 1         |
| MOL Premium       | 1         |
| Treasure          | 1         |
| Ever Steady       | 1         |
| Amapola           | 1         |
| Chrystalia        | 1         |
| Glovis Silver     | 1         |
| See Valiant       | 1         |

# Pilot Ladder Safety Report

## Flag State:

26 Responses

| Data          | Responses |
|---------------|-----------|
| PAN           | 6         |
| MHL           | 5         |
| LBR           | 2         |
| HKG           | 2         |
| USA           | 2         |
| MLT           | 2         |
| SGP           | 2         |
| BHS           | 1         |
| GRC           | 1         |
| KOR           | 1         |
| NLD           | 1         |
| Other entries | 1         |
|               |           |

## Classification Society:

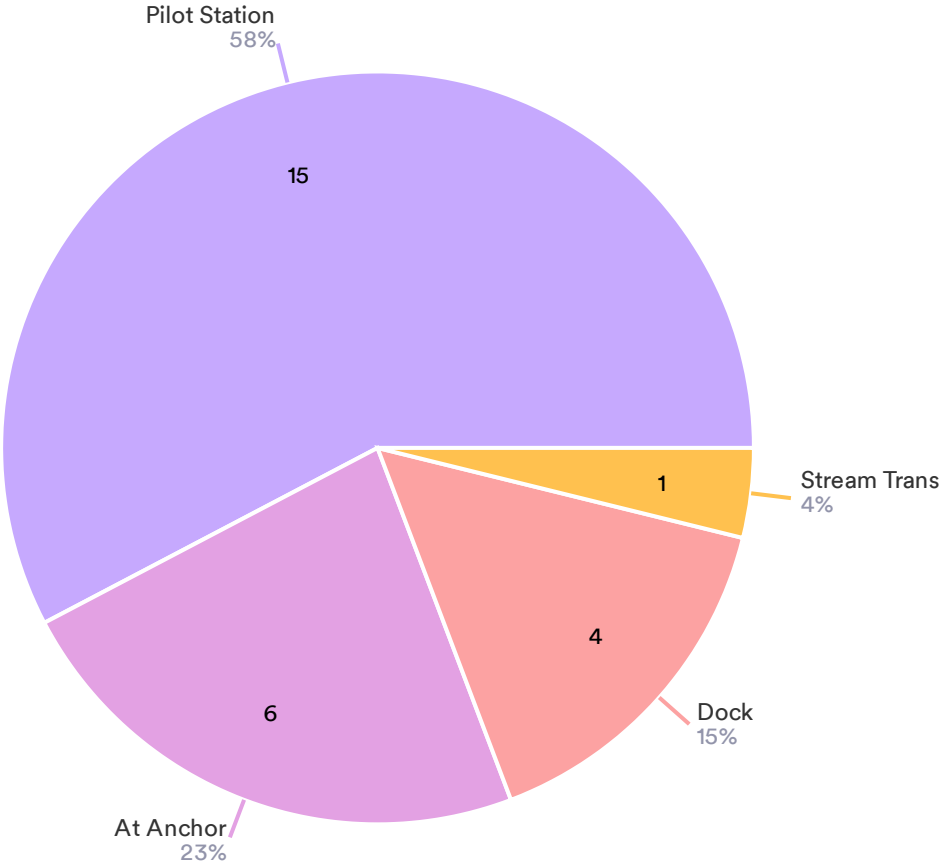
11 Responses

| Data | Responses |
|------|-----------|
| NK   | 6         |
| LR   | 2         |
| ABS  | 2         |
| DNV  | 1         |
|      |           |

# Pilot Ladder Safety Report

Geographic Location:

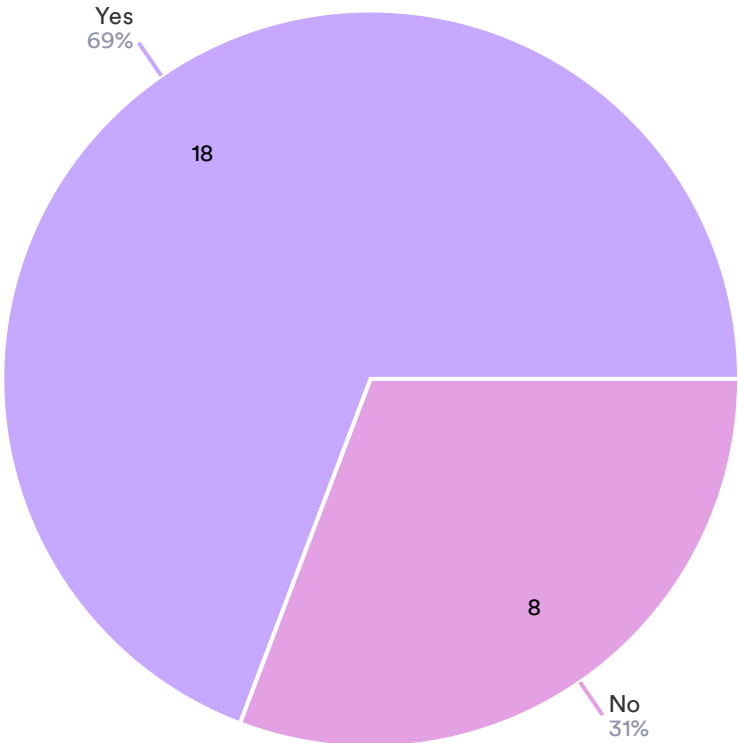
26 Responses



Pilot Station At Anchor Dock Stream Transfer

Master Notified:

26 Responses

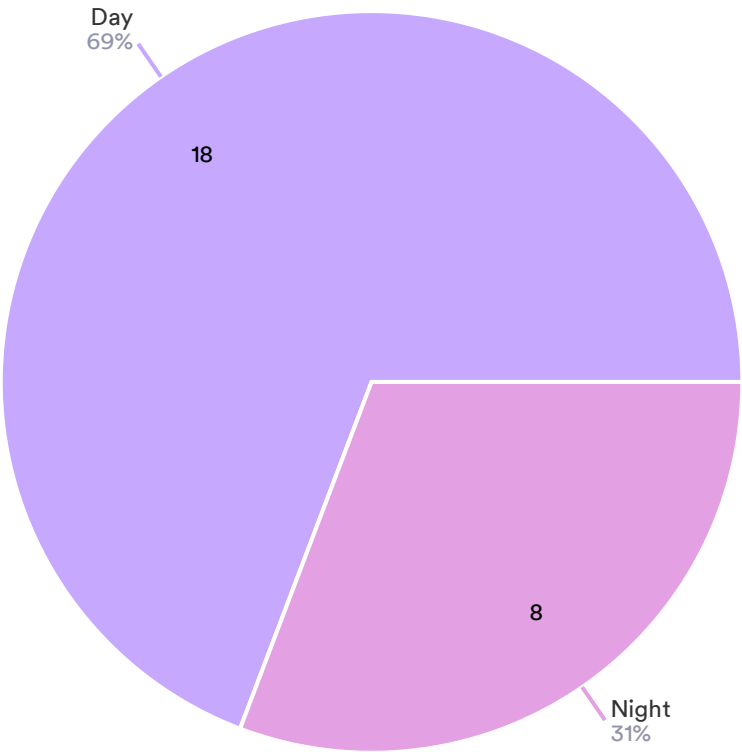


Yes No

# Pilot Ladder Safety Report

## Day/Night:

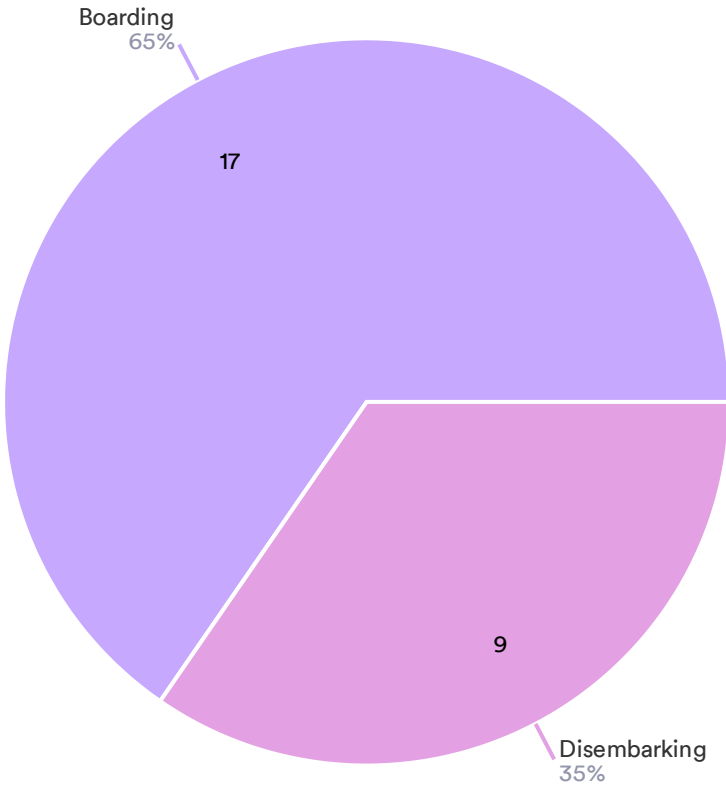
26 Responses



Day Night

## Boarding/Disembarking:

26 Responses

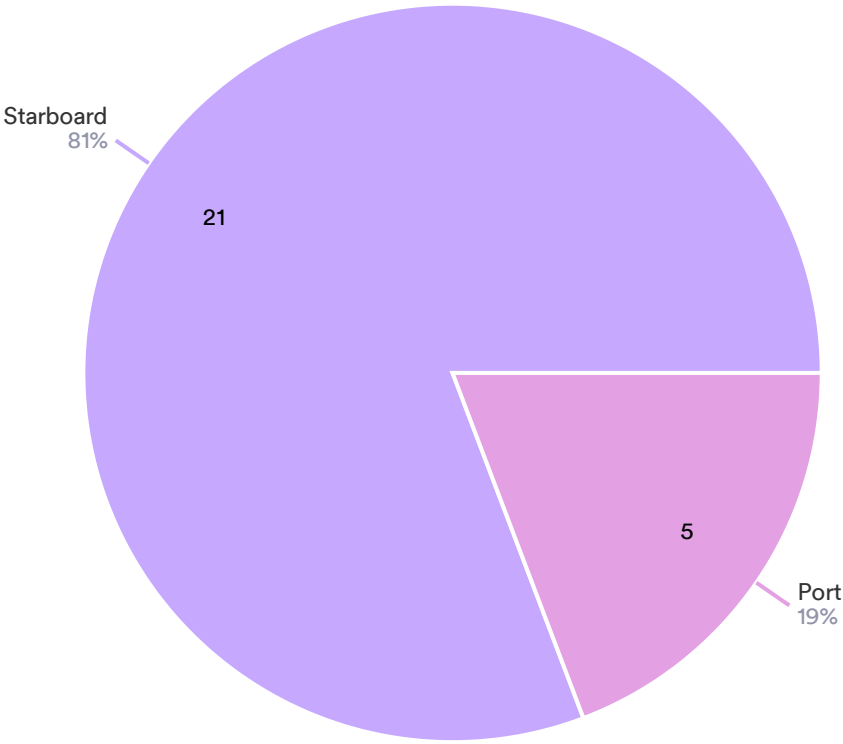


Boarding Disembarking

# Pilot Ladder Safety Report

## Port/Starboard:

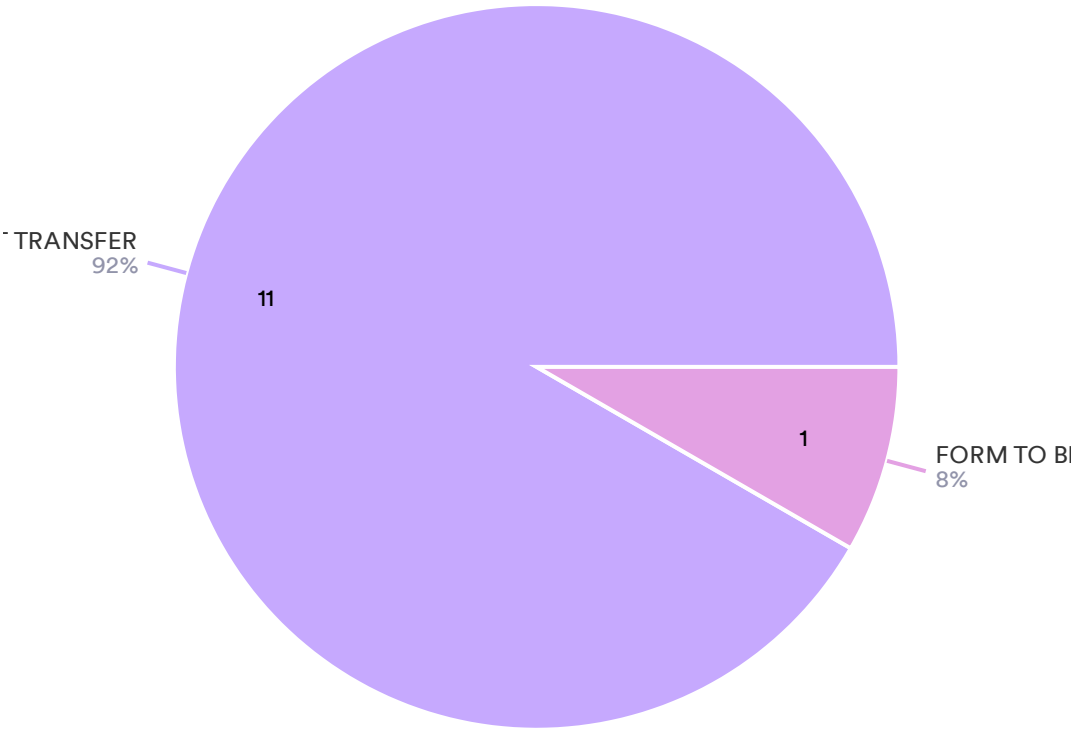
26 Responses



● Starboard ● Port

## Notification:

12 Responses

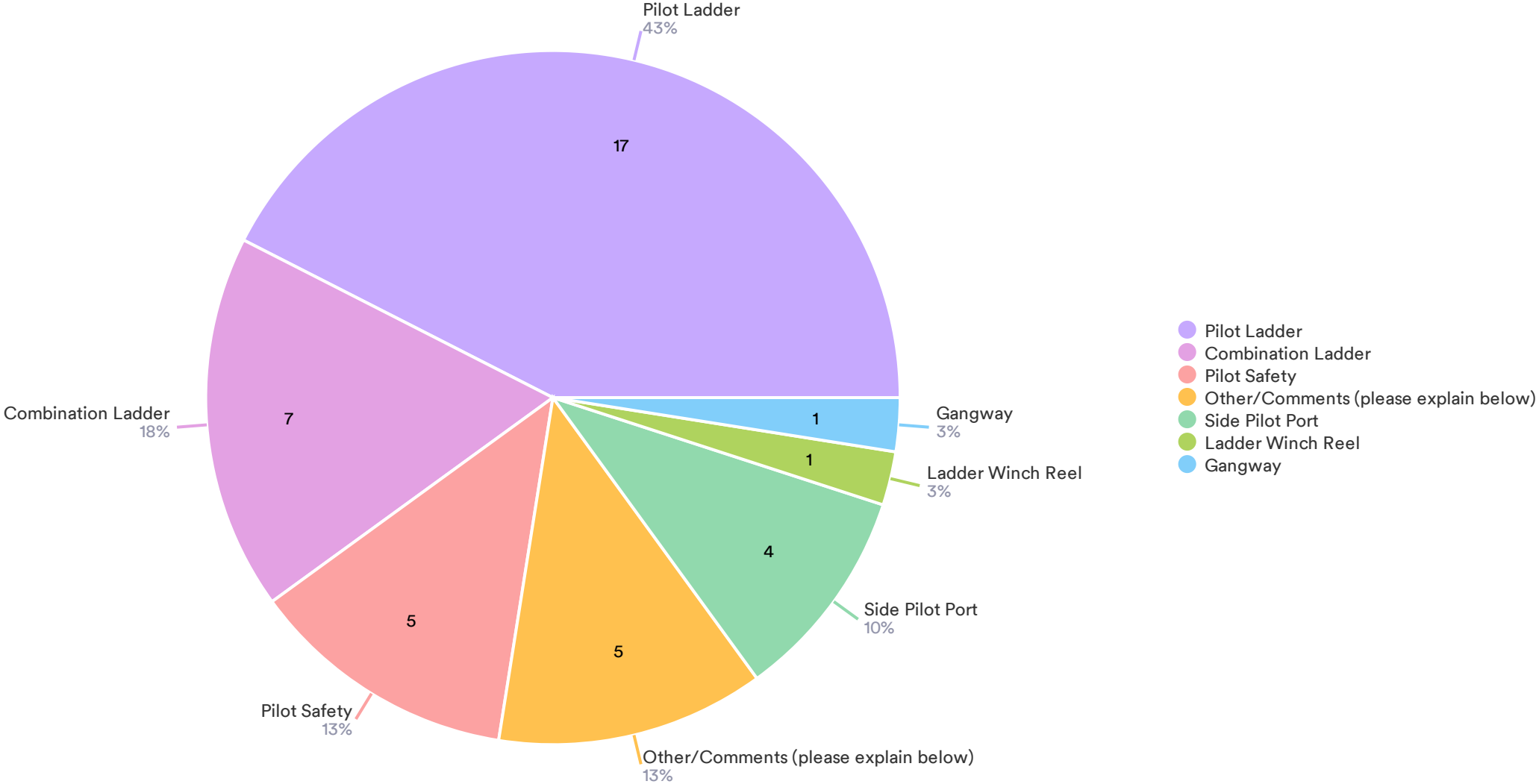


● MUST BE CORRECTED PRIOR TO SAILING OR NEXT TRANSFER  
● FORM TO BE FORWARDED TO NEXT PORT

# Pilot Ladder Safety Report

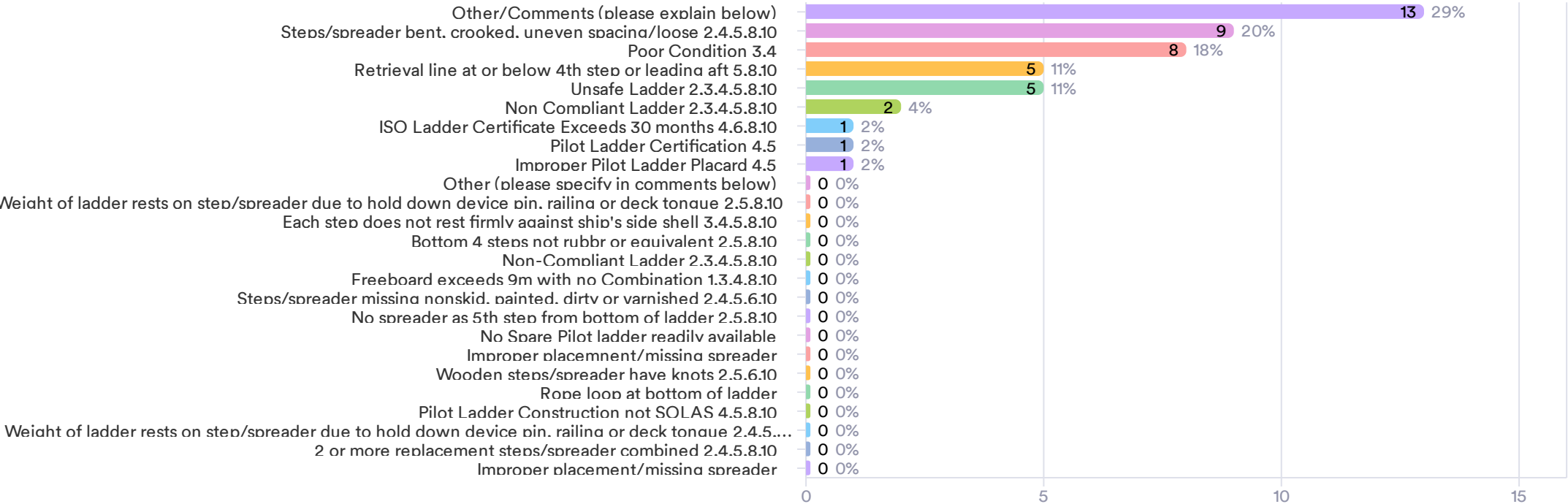
## Non-Compliance:

40 Responses

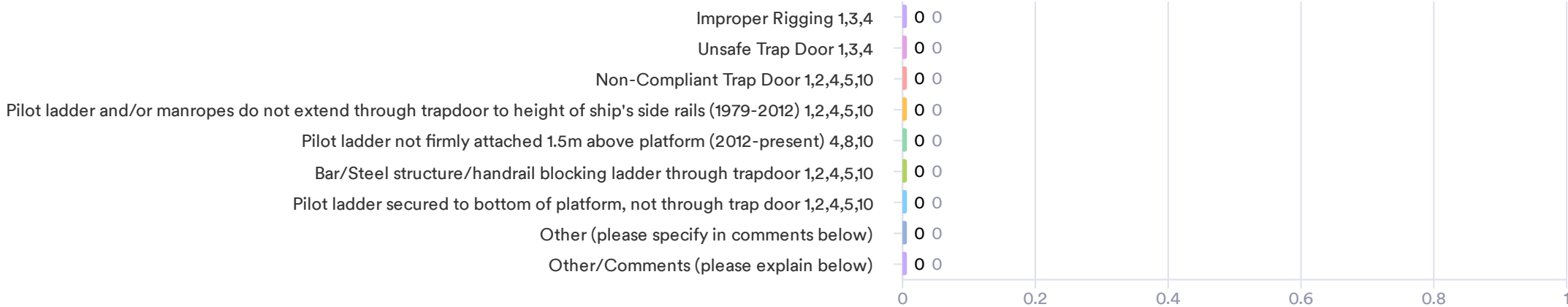


# Pilot Ladder Safety Report

## Pilot Ladder:

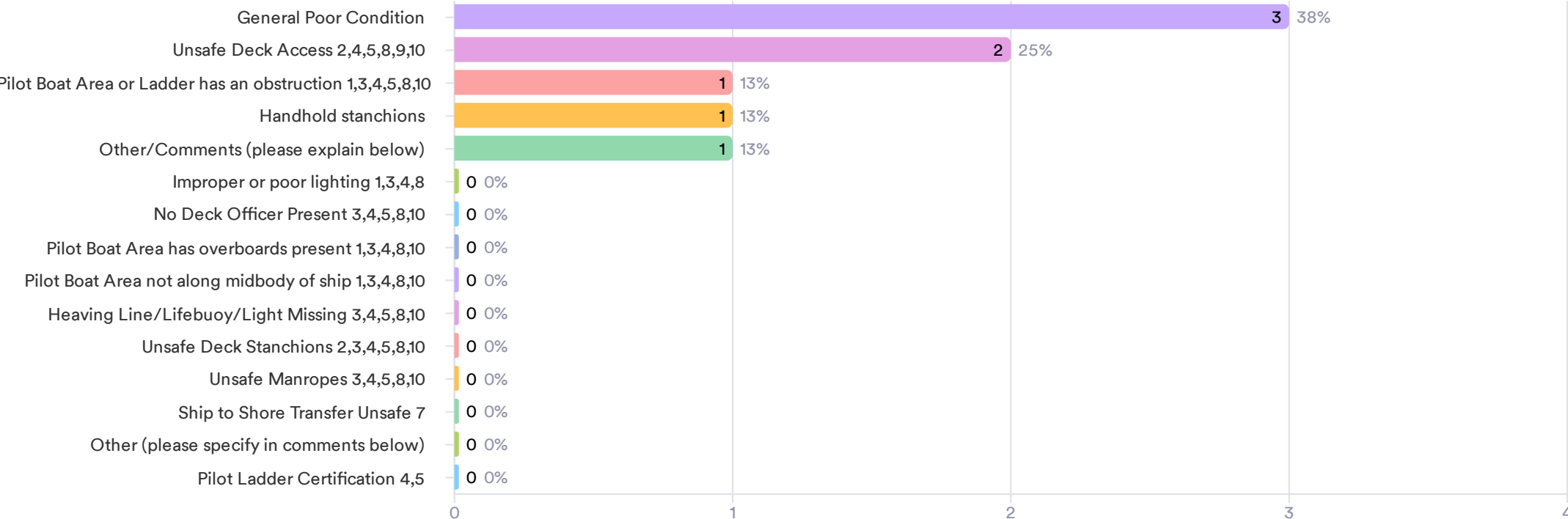


## Trap Door Combination Ladder:

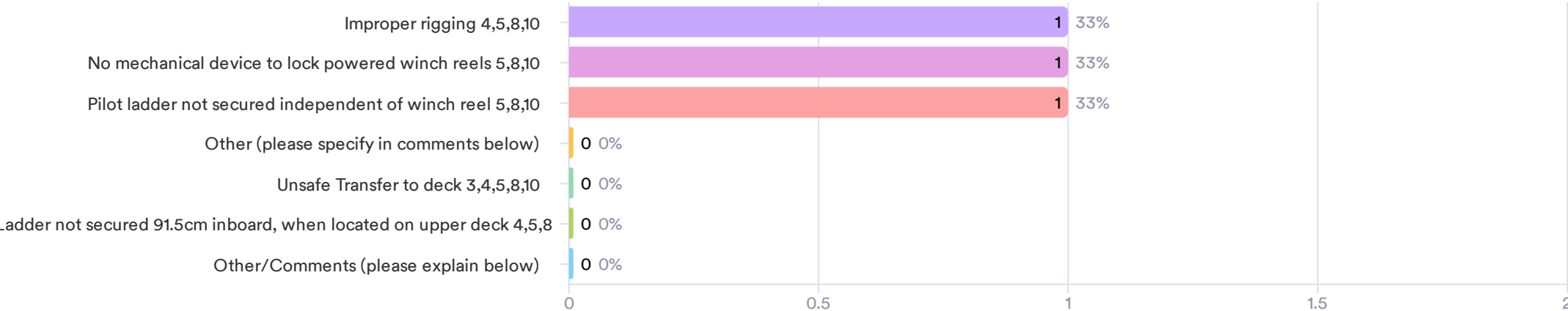


# Pilot Ladder Safety Report

## Pilot Safety:

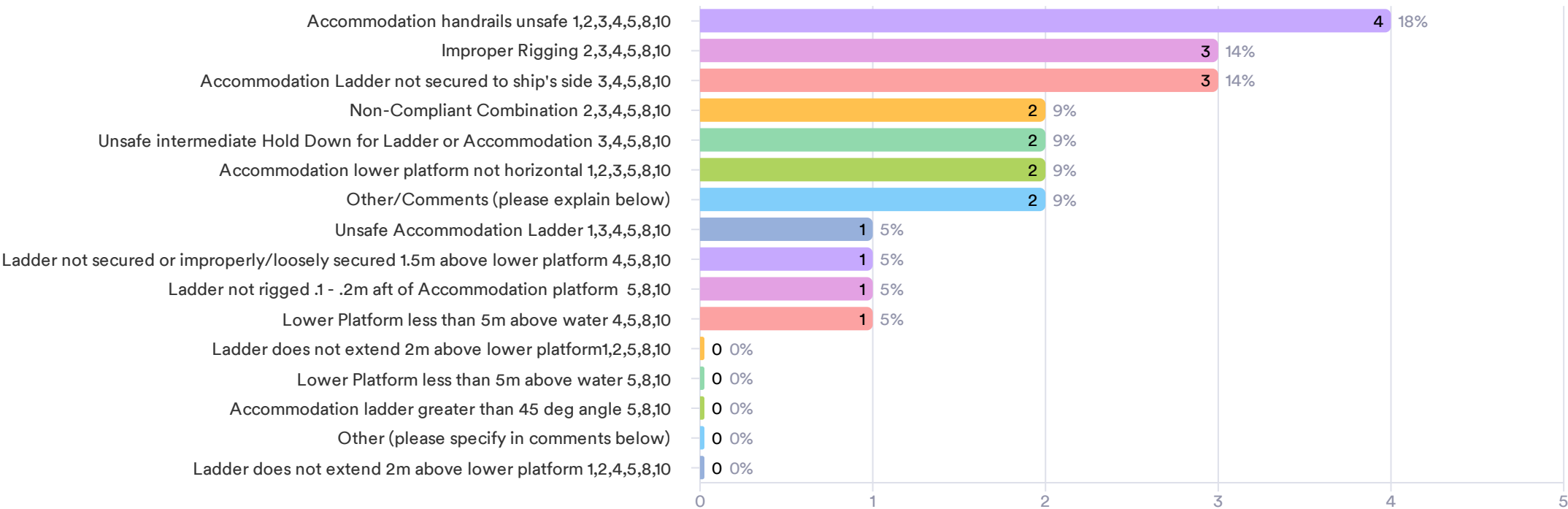


## Ladder Winch Reel:



# Pilot Ladder Safety Report

## Combination Ladder:



## Side Pilot Port:

