

March 21, 2023

Via Email (comments@utc.wa.gov)

**Cascadia
Policy
Solutions**

ENVIRONMENT | CLIMATE | ENERGY

Washington Utilities and Transportation Commission
UTC Headquarters
621 Woodland Square Loop SE
Lacey, WA 98503

Dear Commissioners:

Washington State has a proud tradition of environmental protection. From the Governor's office through the legislature to our committed citizens, we have worked to establish this tradition and to lead the country in identifying environmental challenges and implementing solutions to address them. It has been my privilege to do my part in this effort as the Director of the Department of Ecology, the chair of the Puget Sound Partnership's Leadership Council and Governor Gregoire's Chief of Staff.

Protection of our marine waters, from the Pacific coast to Puget Sound, is one area of particular focus. We have established one of the world's best marine oil spill prevention and response systems. We have adopted a "zero spills strategy" and established a "best achievable protection" standard codified at RCW 90.56.005(4)(i) to properly resource and support Washington's oil spill prevention and response system. No system is perfect and we have more to do here in Washington, but the results speak for themselves as Washington's marine waters have not experienced a large oil spill in many years.

I understand that you are now considering a new tariff rate for Puget Sound Pilots. In my opinion, state pilotage is one of the most effective risk mitigation measures that we have against the very real risks created by marine shipping. Pilotage is part of the state's marine spill protection structure and our state pilotage system must be resourced at a level that complies with the "best achievable protection" standard. This means, among other things, ensuring that Puget Sound Pilots can attract, hire, and retain the best navigators and ship handlers to join our pilot corps.

While shipping is integral to our trade economy, placing a maritime pilot, an experienced local master mariner, aboard these vessels to ensure safe transit through our waters is one of the biggest reasons why we have so significantly reduced oil spills in marine waters. Although the shipping

industry is opposed to the rates proposed by the pilots, I urge you to prioritize environmental protection above the shipping industries cost management concerns.

The “best achievable protection” standard requires a strong, well-trained cadre of pilots capable of safely moving 1000-foot ships loaded with heavy crude around the narrow and crowded waters of Puget Sound. One mistake could be catastrophic. Prince William Sound is still recovering 34 years after the Exxon Valdez spill. Let’s make sure we do all we can to prevent that kind of oil spill here at home.

Thank you for the opportunity to provide my comments.

Sincerely,

A handwritten signature in blue ink, appearing to read "Jay J. Manning", with a long horizontal stroke extending to the right.

Jay J. Manning

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