

March 27, 2023

Washington Utilities and Transportation Commission
P.O Box 47250
Olympia, WA 98504-7250

Submitted via email: records@utc.wa.gov; avery.booth@utc.wa.gov

RE: Docket Number 220513

Dear Commissioners,

The undersigned represent eighteen organizations that work on environmental issues in Washington State which include protecting the Salish Sea watershed, wildlife, human health, and public safety. We respectfully ask the Washington Utilities and Transportation Commission (UTC) to consider, in your tariff setting, the role of Puget Sound Pilots in protecting the Salish Sea ecosystem from accidents and oil spills.

Oil spills not only threaten marine ecosystems, but also endanger human communities that depend on a healthy environment for social, cultural, and economic well-being. According to the Washington State Department of Ecology:

For the 2.8 million households in Washington, the collective willingness to pay to avoid spill impacts for a decade would be \$259 million (2022\$) for ten-year protection, or \$492 million in 20-year present value for two payments ten years apart.

In 2004, Ecology funded extensive modeling of potential spills in Washington. Adjusted for inflation, a single large spill in Washington could result in losses of over \$15 billion (2022-dollars).¹

Puget Sound Pilots are essential to achieving Washington State's zero spills strategy as stated in [RCW 90.56.005\(2\)](#):

The legislature finds that prevention is the best method to protect the unique and special marine environments in this state. The technology for containing and cleaning up a spill of oil or hazardous substances is at best only partially effective. Preventing spills is more protective of the environment and more cost-effective when all the response and damage costs associated with responding to a spill are considered. Therefore, the legislature finds that the primary objective of the state is to achieve a zero spills strategy to prevent any oil or hazardous substances from entering waters of the state.

The undersigned urge the UTC to ensure that the rates charged by Puget Sound Pilots are fair, just, reasonable, and sufficient to ensure the protection of the Washington State waters of the

¹ Preliminary Regulatory Analyses for Chapters 173-180 and 173-184 WAC, January 2023, Publication 23-08-001. <https://apps.ecology.wa.gov/publications/SummaryPages/2308001.html>.

Salish Sea. Fair compensation for services provided by Puget Sound Pilots should ensure that there are sufficient pilots to provide the essential service of piloting large commercial ships. This requires nationally competitive compensation and benefits and authorization for the number of pilots that enables use of best work and rest practices that are consistent with other critical transportation services. Puget Sound Pilots needs to recruit and retain pilots who are the best in the world. The undersigned urge the UTC to fund the pilotage system accordingly.

The local knowledge that Puget Sound Pilots bring to piloting large commercial ships through the inland waters' narrow passages is vital to the protection of Washington State's waters and social, cultural, and economic resources.

Thank you for considering these comments.

Sincerely,

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