Public Comments by Case

Total Comments: 23
In Favor: 18
Opposed: 4
Undecided: 1

Filing Support	Commenter	Source	Comments
No			
	Mason Reed - Matson	E-mail	Dear Commissioners, I am submitting this letter for the public record to formally oppose the Puget Sound Pilots proposed 52% rate increase. Matson fully recognizes the critical importance of safe and reliable pilotage. We support a system that ensures both navigational safety and cost-effective operations. However, there is no demonstrated operational necessity for a rate increase of this magnitude simply to cover Puget Sound Pilots' existing expenses. As a domestic carrier providing essential, high-frequency service in the Puget Sound-with approximately three inbound and outbound vessel transits per week-Matson relies heavily on predictable, efficient, and reasonably priced pilotage. A 52% increase would impose a substantial and unjustified burden on domestic operators that already operate under tight margins and intense competition. Even more concerning, an abrupt increase of this scale disrupts established budgets, contracts, and supply chains across the region. Matson deeply appreciates the knowledge and experience in navigating waterways that the Puget Sound Pilots bring; we have the utmost faith in their competencies. However, it is important to note that Puget Sound Pilots does not provide a true 24-hour dispatch service, unlike other major pilot associations across the United States. For an organization seeking a rate increase, one would expect that parity in service levels would be one of the prerequisites. The absence of round-the-clock dispatch capability is a significant service gap and to my knowledge there is no shortage of pilots given the overall level of pilotage demand. Matson is seeking pilotage services that minimize preventable delays, particularly given my understanding that the number of pilots scheduled for watch per day easily exceeds the average number of assignments each day which should make delays a very infrequent occurrence. It is clear that pilots on watch must not be fully available for assignment or delays and callbacks of off watch pilots would be far more infrequent. These operational limitations have a direct impact on vessel schedules, port productivity, and the broader supply chain. As a vessel operator, we expect all our crew members scheduled for watch to fulfill their duty to stand the watch assigned unless they are not fit for duty.

			Equally concerning is the lack of communication. This proposed increase was announced abruptly, without meaningful advance notice to vessel operators or an opportunity for collaborative discussion. Effective business relationships depend on transparency, predictability, and good-faith engagement. The pilot's development of this proposal and their surprise submission both fall short of those standards. Given the scale of the proposed rate increase, the lack of evidence to justify the increase, the lack of corresponding service enhancements such as 24-hour dispatch, and the abrupt manner in which this proposal was introduced, the request is not justified from our perspective. We also fully endorse the positions of our trade association which has submitted comprehensive testimony on this matter. I understand the UTC process is very thorough and endorse careful scrutiny of this proposal in order to consider the unnecessary and disproportionate impacts it would have on domestic operations and regional commerce. Thank you for the opportunity to submit comments for the public record. Sincerely, Mason Reed Director Vessel Operations - Pacific Northwest
	Kati Capozzi Dir. External Affairs Alaska Chamber	E-mail	January 13, 2026 Brian Rybarik, Chair Washington Utilities & Transportation Commission 621 Woodland Square Loop SE Lacey, WA 98503 Delivered via comments@utc.wa.gov RE: Public Comment on Puget Sound Pilots Request to Increase Pilotage Rates, Docket TP-250574 Dear Mr. Rybarik: The Alaska Chamber appreciates the opportunity to submit comments on the Puget Sound Pilots' (PSP) proposed revisions to the Puget Sound Pilotage District, currently under review by the Washington Utilities and Transportation Commission (UTC). The Chamber recognizes the essential role PSP plays in maintaining safe and secure navigation in the region. However, we have significant concerns regarding the magnitude and abrupt implementation of this proposed rate increase that would create serious ripple effects across the broader business community that relies on predictable, efficient maritime transportation.

			The Alaska Chamber is Alaska's most diverse statewide business advocacy organization. Our mission is to promote a healthy business environment in Alaska. The Chamber has more than 700 members and represents businesses of all sizes and industries from across the state, directly representing 58,000 Alaskan workers and $4.6 billion in wages. A rate increase of this scale would significantly raise costs for Alaska-bound cargo carriers and cruise operators, disrupting long-standing budgets, contracts, and supply chains that serve Alaska businesses and consumers. The Puget Sound is a vital gateway for Alaska's economy, supporting everything from essential goods and fuel to tourism and visitor-related commerce. Sudden and disproportionate cost increases threaten Alaska's competitive position, risk higher prices for consumers, and create uncertainty that undermines investment and long-term planning across multiple industries. The Alaska Chamber urges careful scrutiny of the proposed rate increase and encourages a more measured, collaborative approach that preserves maritime safety while maintaining fair, reasonable, and predictable costs for the businesses and communities that depend on this critical transportation corridor. Thank you for considering the Alaska Chamber's comments on this very important issue. Sincerely, Kati Capozzi President and CEO
	Mike McGarryVP Govt Aff. Cruise Line Int'l Assoc.	E-mail	January 13, 2026 Brian Rybarik Chair Washington Utilities and Transportation Commission 621 Woodland Square Loop SE Lacey, WA 98503 Delivered via comments@utc.wa.gov Re: Concerns with Proposed Revisions to Tariff No. 2 for the Puget Sound Pilotage District (Docket TP-250574) Dear Mr. Rybarik: On behalf of Cruise Lines International Association (CLIA) and our member cruise lines, we appreciate the

opportunity to provide comments on the Puget Sound Pilots' (PSP) proposed revisions to Tariff No. 2 for the Puget Sound Pilotage District currently under review by the Washington Utilities and Transportation Commission (UTC). CLIA member cruise lines represent the majority of cruise calls at the Port of Seattle within the Puget Sound Pilotage District, which serves as a critical gateway for the Pacific Northwest-Alaska cruise corridor. We certainly recognize the critical role the PSP plays in ensuring safe and secure cruise operations in the region. However, we have significant concerns regarding the magnitude and execution of the proposed rate increase that we detail in this letter for the UTC's consideration.

CLIA is the leading global cruise industry trade association, advocating for safe and sustainable cruise operations, supporting tourism strategies that benefit communities, and promoting innovation toward sustainable cruise operations and the pursuit of net-zero emissions by 2050. With a global presence and membership that includes ocean, river, and specialty cruise lines, maritime leaders, ports, destinations, shipyards, and travel professionals, CLIA provides resources, expertise, and policy leadership to protect and promote the industry's responsible growth.

Magnitude of the Proposed Increase
The PSP's proposed revisions to Tariff No. 2 would result in more than a 53 percent average increase in pilotage costs for cruise lines calling at the Port of Seattle. This represents a significant and unjustified escalation in operating costs for CLIA member cruise lines that will have a negative impact on the cruise business in the Pacific Northwest. Cruise lines plan itineraries, coordinate vessel deployments, and sell cruise passenger fares several years in advance, and they have limited flexibility to modify future ticket pricing without adding to the expense for vacationers to sail from the Port of Seattle.

In reviewing the docket and supporting materials, CLIA does not believe the PSP has demonstrated that the increase would result in rates that are fair and reasonable as requested by the UTC in its August 21, 2025, Complaint and Order Suspending Tariff Revisions. As outlined in the proposed rate increase exhibit provided by PSP to the UTC for the docket (NEW-PSP-Exh-IC-14-29-25), under the current Tariff No. 2, a 169,000 gross register tonnage (GRT) contemporary class cruise ship pays $14,309.20 one-way (one pilot assignment) or $28,618.40 roundtrip (two pilot assignments) for pilotage services to/from the Port of Seattle. Under the PSP's proposed Tariff No. 3, that same cruise ship would pay $21,938.31 one-way (one pilot assignment) or $43,876.62 roundtrip (two pilot assignments) to/from the Port of Seattle for pilotage services, an additional $15,258.22 or a 53.32 percent increase in cost.

Similarly, under the current Tariff No. 2, a 145,000 GRT contemporary class cruise ship pays $12,695.67 one-way (one pilot assignment) or $25,391.34 roundtrip (two pilot assignments) for pilotage services to/from the Port of Seattle. Under the PSP's proposed Tariff No. 3, that same cruise ship would pay $19,481.16 one-way (one pilot assignment) or $38,962.32 roundtrip (two pilot assignments) for pilotage services to/from the Port of Seattle, an additional $13,570.98 or a 53.45 percent increase in cost.

The Port of Seattle is currently one of the most expensive cruise ports from which cruise passengers embark, compared to others in the United States. Data from CLIA member cruise lines show that pilotage costs for similarly sized contemporary class cruise ships operating from the Port of Seattle are higher than those paid at other large U.S. cruise ports around the country, including Miami, Port Canaveral, and Galveston. Relatedly, port fees and taxes paid by passengers for seven-night cruises from the Port of Seattle are also higher than those paid by passengers sailing from Miami, Port Canaveral, and Galveston.

Impacts on Competitive Positioning for Washington's Tourism Economy
The Port of Seattle competes with other West Coast ports in British Columbia and California for cruise passenger traffic. These passengers spend significant money before and after cruises in the Seattle and broader Puget Sound community, supporting local small shops and businesses, restaurants, hotels, attractions, and much more. The cruise industry currently generates a $2.9 billion economic impact in Washington, supporting 12,000 jobs and $1.2 billion in wages.

The sharp increase in pilotage rates proposed by the PSP could result in additional cruise ticket costs for consumers, potentially causing them to opt for cruises from different ports. History has demonstrated price sensitivity can result in negative booking activity when costs and fees get too high and consumers prefer more affordable options. This could have negative impacts for the Port of Seattle and the surrounding tourism economy.

Request for Consideration
We greatly appreciate the UTC's review of CLIA's comments regarding Docket TP-250574. We respectfully urge the UTC to consider the concerns raised by the cruise industry and broader maritime community, and endeavor to find a collaborative solution that supports safe pilotage while maintaining pilotage rates that are fair and reasonable for operators at the Port of Seattle.

Thank you for your attention to this important matter. If you have any questions or need additional information from CLIA, I can always be reached at mmcgarry@cruising.org or (202) 341-5620.

Sincerely,

Mike McGarry
Executive Director for North America and
Senior Vice President of Global Government Affairs

	Phil Morrell VP Marine Ops TOTE Services LLC	E-mail	January 12, 2026 Washington Utilities and Transportation Commission P.O. Box 47250 Olympia, WA 98504 Submitted via email: comments@utc.wa.gov RE: Puget Sound Pilots (PSP) Request for Increase in Pilotage Rates, Docket TP-250574 Dear Commissioners, Thank you for the opportunity to comment on the proposed pilotage tariff revision. TOTE Maritime Alaska provides essential service to and from Anchorage and beyond. We pride ourselves on reliable, safe, environmentally sound cost-effective service. This is manifested by timely weekly service on two specially designed vessels that now use LNG as their main fuel. We strongly oppose the Puget Sound Pilots proposed rate increase which if applied to these two TOTE vessels would increase our pilotage costs in Puget Sound by 54% to nearly $2,300,000 annually. This would shockingly represent an increase of over $800,000 per year. I have attached PSP exhibit IC-14 and a Tote excerpt comparing current tariff to proposed tariffs as the proposal is highlighted to an even greater extent when seeing the numbers involved per ship call which involves an inbound and outbound assignment meaning you have to look at two invoices to obtain the ship call costs for pilotage here (see Attachments). You may recall we challenged PSP's attempted unfair tonnage charge in a previous case and are appreciative that the UTC agreed it was unfair and ordered the proper tonnage be applied for pilotage charges. That case involved over $300,000 per year for 2 years. We challenged it because that amount of money is significant to us not only on an annual basis but magnified when assessing multiple year budgetary challenges. As a former Washington State Board of Pilotage Commissioner, I am close to pilotage issues, and I have not seen any justification or essential need for an increase. I am fully aware that average size of vessels in the container and cruise sectors bring in more revenue to the pilots without increasing rates and am confident this reality is not highlighted in their communications with you. I am also aware that pilots have reduced their annual workload per pilot while continuing to enjoy increased revenues. As a result of the extreme tariff increases sought by PSP, TOTE is formally evaluating providing our own pilots. As Jones Act domestic carriers, we are allowed to do this if our masters (or mates) have first class pilotage endorsements from the Coast Guard. There are several advantages to pursuing this potential outcome including elevated familiarity and experience operating our vessels, avoiding the embarkation and disembarkation process

			and savings of fuel and emissions to name a few. In addition, the system would realize a reduction of 204 assignments a year which may or may not be seen as a benefit. TOTE recognizes the importance of safe and efficient pilotage though it has to be provided at fair and reasonable costs supported by established and proven needs. Pilots' costs can't be determined by what the pilots want and instead should be based on what the system needs. I realize and appreciate that UTC has a thorough process to go through and strongly encourage Commissioners to consider no tariff increases unless fully justified by evidence-based needs. Sincerely, Phil Morrell Vice President Marine Operations TOTE Services LLC
Undecided			
	Antonio Machado NW Reg Affairs & Fuels	E-mail	January 13, 2026 Sent via upload to: www.utc.wa.gov/consumers/submit-comment UTC - Reference Docket TP-250574 P.O. Box 47250 Olympia, WA 98504 Re: WSPA Comments on Maintaining Safe, Reliable, and Statutorily Grounded Marine Pilotage Services Dear Commissioners: The Western States Petroleum Association (WSPA) appreciates the opportunity to provide comments regarding matters currently under consideration by the Washington Utilities and Transportation Commission (UTC) involving marine pilotage service, associated operational requirements, and any related compensation or cost-recovery determinations. WSPA is a trade association representing companies that provide a diverse range of transportation energy sources throughout the western United States, including Washington. Its members are involved in the transportation and marketing of petroleum, petroleum products, natural gas, and other energy supplies.

			WSPA's membership includes energy shippers, marine operators, terminal operators, and other regulated entities that depend on Washington's pilotage system to ensure the safe and efficient movement of commerce and our interest is in maintaining a pilotage framework that is safe, reliable, transparent, and consistent with Washington's statutory mandates. We respectfully request the UTC's consideration of the following points. Keep Decisions Anchored to RCW Mandates and an Evidence-Based Record WSPA's position is that policy, operational, and rate decisions should be grounded in the controlling statutes and supported by a thorough evidentiary record. WSPA is not categorically opposed to rate adjustments when they are clearly justified, tied to measurable improvements in service, and supported by evidence. However, the magnitude of any proposed increase must be carefully scrutinized to ensure it is proportionate to demonstrated need and accompanied by concrete commitments that materially improve service outcomes. As raised by operators in this proceeding, a proposed increase on the order of 52% would warrant particularly rigorous justification and a clear demonstration of commensurate benefits. Rate determinations should reflect demonstrated operational requirements and verifiable cost drivers, not aspirational concepts untethered from evidence. Reliability and Dispatch Responsiveness Are Essential for Year-Round Operations For WSPA's members and other industrial operators, operations are continuous and time-sensitive. Dispatch coverage and scheduling responsiveness are not conveniences; they are essential to safe, efficient, and predictable operations. Stakeholders have identified the need for: . 24/7 dispatch coverage; and . greater flexibility and responsiveness in scheduling vessel sailings. Before stakeholders can responsibly support meaningful rate changes, the UTC should require enforceable commitments that protect service reliability for year-round operators. Seasonal patterns affecting certain segments of maritime activity (including periods when pilots may be training or on leave) do not align with the operating cadence of year-round industrial traffic. Any framework that contemplates higher costs should also include assurances that year-round users will not be disadvantaged during periods that are "offseason" for other users. Modernization Should Reduce Avoidable Downtime and Improve System Efficiency WSPA supports modernization efforts that measurably improve reliability and reduce avoidable inefficiencies. In particular, the UTC should encourage improvements to scheduling, dispatch

coordination, and travel/downtime management through the adoption of advanced technology and better modeling tools.

Whether characterized as optimization, decision support, or advanced analytics, improved scheduling systems can:

. increase service reliability,
. reduce unnecessary transit and downtime; and
. strengthen overall service delivery and system resiliency.

Our members have also raised the importance of improving the efficiency of vessel movements and the utilization of limited regional resources, including assist/escort tugs. Delays and avoidable inefficiencies create compounding impacts, operationally, economically, and in terms of system resiliency. The UTC should prioritize solutions that reduce avoidable downtime and improve coordination across the system.

Reevaluate Operational Constraints That May No Longer Reflect Current Vessel Capabilities

For WSPA and its members, we request that the Commission review certain operational constraints that contribute to delay and may not reflect modern vessel handling characteristics and escort/assist tug capability. One frequently cited example is the Green Point tide window and associated transit limitations. Operators have indicated that this requirement can drive delays and should be reevaluated to ensure it is appropriately tailored to current conditions, vessel capability, and risk controls in place.

Address Safety Through Specific, Essential Operational Requirements

For WSPA and its members, safety is not a slogan; it is a value. It is a set of operational requirements and investments that should be evaluated on their merits. WSPA believes that one area plainly connected to safe service delivery is pilot boat capability and safe embarkation and disembarkation of pilots. Measures necessary to provide that safe service are appropriately treated as "essential" and should be evaluated accordingly.

At the same time, we encourage the UTC to carefully distinguish between:

. clearly essential safety-related requirements that directly enable safe pilotage operations; and
. broader proposals that may be framed as "safety" but require a stronger showing that they

			are fair, reasonable, sufficient, and essential under the governing standards. Conclusion For these reasons, WSPA calls for an evidence-based approach that aligns costs with demonstrable service needs and ensures reliability for all users, particularly year-round industrial operations. We appreciate the Commission's consideration and remain available to participate constructively as the docket proceeds. WSPA appreciates the opportunity to provide comments on this important matter. If you have any questions regarding the comments presented in this letter, please do not hesitate to contact me via e-mail at amachado@wspa.org or by phone at (360) 594-1415.
Yes			
	Joshua Lippert AXA AL Risk Consultant	E-mail	December 7, 2025 To Whom It May Concern, I am writing in support of the Puget Sound Pilots as part of the current rate review. My name is Joshua Lippert, and I serve as a Marine Risk Consultant for AXA XL, supporting underwriting decisions across our Hull & Machinery, Cargo, Stock-Throughput, and Project Cargo lines. Before joining AXA XL, I spent nearly two decades at sea as a Master Mariner in operations where confined waters, complex cargoes, and tight margins made pilotage a critical safeguard. That operational background now directly informs the loss-prevention and exposure analysis I provide to our underwriters and clients. Puget Sound represents a high-consequence risk environment. The combination of constrained channels, heavy commercial traffic, and sensitive shorelines leaves very little room for error. When an incident occurs in these waters, it does not stop at hull damage. It often becomes a multi-line loss event involving cargo damage, delay exposure, liability claims, and significant economic disruption. Modern cargoes high-value equipment, energy components, reefer commodities, and time-critical shipments, are especially vulnerable to navigational incidents in tight waterways. This is why a strong, well-supported pilotage system is viewed within the insurance market as a core risk-control measure rather than an operating expense. A capable pilot corps reduces both the frequency and severity of losses across the entire marine portfolio. Their local knowledge and ship-handling expertise consistently prevent the types of grounding, collision, and allision scenarios that drive the largest combined hull-and-cargo claims we see in the Pacific Northwest and beyond. While insurers are not ratepayers in this proceeding, we are direct beneficiaries of safe, reliable pilotage, as it protects the vessels and cargoes we insure. Under-resourced pilotage shifts risk

			downstream to shipowners, cargo interests, underwriters, and the broader supply chain. Conversely, properly staffed, trained, and compensated pilotage significantly reduces risk for all parties. Page 2 | I am not expressing a position on specific rate levels. However, based on my experience reviewing casualties, advising on mitigation strategies, and supporting underwriting decisions at AXA XL, it is clear that Puget Sound requires a pilotage service capable of handling larger ships, higher-value cargoes, and an increasingly complex insurance environment. At AXA XL, we have a vested interest in the safety and security of vessels and cargo in Puget Sound. Supporting this capability enhances safety, protects cargo, stabilizes risk, and benefits everyone involved in the Sound's maritime commerce. Captain Joshua Lippert Risk Consultant – Marine AXA XL Risk Consulting AXA XL
	John J. Malone Schuyler Line Navigation Company LL	E-mail	11DEC2025 To Whom It May Concern: I am writing this in support of the Puget Sound Pilots rate hearing which is scheduled to take place in front of the Washington Utilities and Trade Commission (UTC). This letter is in addition to one I submitted in 2023 under the same subject, so I will leave out my background. SLNC is a growing US Flag operator, now with 7 vessels under our direct Ownership and Technical Management, with plans to grow further in 2026 and beyond. We operate tankers and heavy lift vessels, container ships and a bulker and as we have grown we continue to recognize the importance of well-trained mariners not only those directly employed by us but also those who provide integral services such as Pilot Associations. Our calls to the Pacific Northwest have grown over the years, as have other operators, and as larger ships call with fewer crew onboard, they are stretched to the limit as you know. That is where I feel more experienced and better qualified pilots become more of a key component. The pilots are the first line of defense for any port. Those in law enforcement may like to think otherwise, but an eNOA only tells part of the story. An experienced mariner turned pilot knows what to look for onboard, and can be the difference between a standard transit, an emergency, and a ship detention. Experience counts and to get personnel with the right experience who will do the right thing when needed is what every association should strive for. Yes, a mariner can be taught how to pilot a vessel, but the one with the years of senior officer and command experience is the one who is quietly doing so much more for you, and needs to be attracted accordingly. Although the business side of me would love for pilot fees to be lower, you get what you pay for. If the Puget Sound Pilots need to continue to address an increase in tariff to ensure a stronger future, then it is worth supporting. The state relies on strong professionals to ensure the continued safe operation daily of the many US and foreign vessels that transit her waters. They need to be properly compensated to ensure their future success and the safety of the extensive Puget Sound.

			Please feel free to reach out to me if I can provide any further information. Regards John J. Malone DPA / Port Captain Schuyler Line Navigation Company LLC
	Andrew Barkis Washington State Legislator Dist. 2	E-mail	Washington Utilities and Transportation Commission Attn: Jeff Killip, Executive Director and Secretary 621 Woodland Square Loop S.E. Lacey, WA 98503 Re: Docket 250574 - Puget Sound Pilots Tariff Dear Executive Director Killip and Commissioners: We write in support of appropriate adjustments to the Puget Sound Pilots tariff in Docket 250574. The Legislature directed Washington's pilotage rates be set by the Utilities and Transportation Commission in a manner that is fair, just, reasonable, and sufficient to support safe and reliable pilotage service. Encouraging the Commission to give meaningful weight to the evidence in this rate-setting process is consistent with the support the Washington State Legislature has shown for the Puget Sound Pilots in protecting Puget Sound and the citizens of Washington. It is critical that Washington pilots are provided with comprehensive training, sufficient rest, and compensation that is competitive with other pilotage districts and states. Pilots carry extraordinary responsibilities: routinely boarding ships on exposed pilot ladders in all weather, accepting substantial personal and financial liability, and maneuvering increasingly large vessels through waterways and port infrastructure that were not designed for ships of today's size. Washington is among the most trade-dependent states in the nation; every loaded tanker, cruise ship, and deep-draft cargo vessel guided by a Puget Sound Pilot carries both economic opportunity and enormous risk for our coastal and tribal communities, fisheries, small businesses, and taxpayers. To safeguard these interests, the Commission should support a stable, well-funded pilotage system that is essential to the protection of Puget Sound. The beneficiaries of a safe, well-funded pilotage system are the people of Washington State whose waters and shorelines are protected from catastrophic incidents. The Commission should approve rates that are sufficient to attract and retain a robust, diverse, and highly qualified pilot corps capable of providing safe, reliable pilotage service in all conditions. Washington's economy and coastal environment depend on such a system. Thank you for your consideration of these comments and for your work on this important matter. Sincerely, Representative Andrew Barkis 2nd Legislative District
	Ally Tenorio-Womens	E-mail	January 3rd, 2026 Washington State Utilities and the Transportation Commission

	Offshore Foundation		Attn: Commissioners Reference Docket TP-250574 Dear Commissioners, I am writing on behalf of Women Offshore to express our support and provide perspective for the Washington State Utilities and Transportation Commission's review of pilotage rates under Docket TP-250574. Women Offshore is a national nonprofit organization dedicated to supporting professionals who work on the water. Our work is informed by the lived experience of mariners across the United States, including those who serve in high-responsibility roles such as pilotage. Through our programs and direct engagement, we understand the demands and accountability associated with this profession. Maritime pilots play a critical role in managing navigational risk in complex waterways such as Puget Sound. Their work directly affects vessel safety, environmental protection, and the integrity of port infrastructure. Pilots routinely operate in high-traffic, limited-maneuvering environments with variable weather and large vessel drafts, where the consequences of error are significant. Through our career development, mentorship, and scholarship programs, Women Offshore works directly with mariners as they move from early career roles into positions of greater responsibility. We see individuals weighing whether to pursue paths such as pilotage and other safety-critical roles, or to step away from those tracks altogether. Compensation that reflects responsibility is often part of those decisions. Womenoffshore.org hello@womenoffshore.org Offshore Careers Start Here. Independent research cited in this proceeding reinforces what mariners encounter firsthand: experienced pilots materially reduce risk in complex operating environments. This context is important when considering the level of responsibility pilots bear and the expertise required to perform the role safely. From our perspective, compensation is an important factor in attracting and retaining qualified professionals. When compensation does not reasonably align with responsibility, it can create challenges for workforce stability and safety over time. We understand that Puget Sound Pilots are seeking compensation aligned with the U.S. national average, not premium or top-tier rates. The responsibilities assumed by Puget Sound pilots warrant compensation that reflects the skill, experience, and risk inherent in the role. Despite operating in one of the highest-cost-of-living regions in the country, the request before the Commission is limited to alignment with the U.S. national average. Women Offshore supports compensation structures that reflect the role professional expertise plays in maintaining safety. Competitive, market-aligned compensation supports workforce

			continuity and helps sustain the high safety standards expected in Washington's waterways. Thank you for the opportunity to provide this perspective. We appreciate the Commission's consideration. Respectfully, Ally Tenorio Founder and President Women Offshore
	John McCarthy-Port of Tacoma Commissioner	E-mail	Dear Commissioners and Executive Director of the UTC: I am a Commissioner of the Port of Tacoma and the Northwest Seaport Alliance and have served in this capacity for many years. I am writing to you in my individual capacity as a Port Commissioner. I am writing to express my personal support for establishing PSP's pilotage rates in an amount which is comparable to those set around the United States in similar major Ports with similar navigational challenges including vessel sizes and other complicating factors. We are one of the top seven gateways in the United States. I have travelled with Pilots on their journeys in the Puget Sound with large vessels to major Port facilities handling international trade. Just recently, 12/22/2025, I boarded the Evergreen Line "Ever More" in transit to its destination at the Port of Tacoma, up the Blair waterway for two miles, to Evergreen's terminal . This vessel is approximately a 16,500 TEU vessel , 1200 feet by 167 feet with a 43-foot draft and a wind sail area of 16,500 square meters. This is one of the largest vessels to call in our gateway. The wind we experienced on 12/22 was 20-25 knots. As the vessel traveled up the two-mile waterway, there were other moored cargo vessels along the side of the waterway that were working gantry cranes on other terminals near the ship as we slowly moved up the waterway. This is truly the heart of our very important international trade in Washington State. I served on the Port Commission when we were able to attract Evergreen Line to the Port of Tacoma over 35 years ago, in 1991. Evergreen Shipping Agency(American) Corporation recognized the Puget Sound Pilots as their Marine Vendor of the year in 2018. We are very proud of our long-term partnership with Evergreen and very proud of the work the Pilots have done in making sure the vessels have transited safely so we could maintain that partnership. I spoke at length with the Evergreen captain on 12/22. He discussed the navigational challenges this important terminal presented as compared to other terminals and waterways they navigate around the world. It requires skilled pilotage.

			It truly takes the absolute best Pilots in the World to get our import and export cargo to many of our terminals. I cannot understate the absolute value the Pilots bring to our ability to operate our Ports in Washington State and bring jobs to our economy. Billions of dollars of cargo are shipped thru our Ports and over 43,000 jobs are created thru NWSA marine trade. I also share the concerns they have expressed about personal safety considerations they encounter as they climb a rope ladder to enter these large vessels in transit and I understand that they also have potential financial liability exposure and responsibility for American flag ships in the event of error . Please consider the above and please contact me if you have any questions. Sincerely, John McCarthy, Port of Tacoma Commissioner
	Don Marcus-Intl Org of Masters Mates & Pilots	E-mail	Dear Chairman Rybarik: Please accept this submission for consideration by your Commissioners. The environment of Puget Sound and the flow of domestic and international commerce are priceless jewels held in trust by the citizens of Washington State. For proper stewardship of these assets, resources must be expended and exemplary care taken. Seaborne commerce is too often a hidden industry to the public. The cargo vessels of all types that keep our economy functioning become notable only if disaster strikes. The destruction of the Key Bridge last year by the M/V Dali, the grounding of the M/V Ever Given in the Suez Canal in 2021, and the back-up of vessels in West Coast Ports caused by the Covid-19 pandemic a few years ago all had tremendous impacts on local or regional economies. None of us of a certain age will forget the impact of the grounding of the Exxon Valdez on the environment of Alaska's Prince William Sound. On these occasions the fundamental vulnerability of maritime trade and its impact on the environment and economy become obvious to even the most myopic citizen-consumer. Puget Sound Pilots are essential guardians to Washington's environment and economy. Even if the program continues to attract applicants, Washington must be able to compete nationally for the most capable, experienced mariners who can meet the extraordinary demands of this profession, and to fill the vacancies caused by the attrition of an aging workforce. This must be addressed. As the current workforce ages out, there are simply fewer younger, qualified mariners to replace them. As a result, the mariners who are available are in higher demand. They are presented with significant and most frequently more financially rewarding options in other pilot associations around the country. If pilot compensation and benefits in Puget Sound are not nationally competitive, Washington will be at a disadvantage in attracting and retaining the highest quality candidates over time, particularly as retirements

			occur. INTERNATIONAL ORGANIZATION OF MASTERS, MATES & PILOTS, AFL-CIO PRINTED IN HOUSE Washington will risk losing top candidates to other pilot associations and maritime employers that offer a more competitive total compensation package. The record in this docket indicates that PSP's compensation is significantly below most state-regulated pilot organizations nation-wide, which further increases the need for a nationally competitive total compensation package. The training, credentials, skill and innate talent necessary to produce a first-class harbor pilot are not readily found. Anywhere from fifteen to twenty years of experience aboard ship and in study ashore is necessary to obtain the necessary qualifications to competently navigate the large, increasingly unwieldly merchant vessels that transit Puget Sound. The largest of these vessels are built to operate efficiently in the open seas at moderate to full speeds. Cargo capacity and fuel efficiency dictate this design. While reasonably maneuverable at sea, in congested waters and at slow speed these vessels can very quickly become irrevocably unmanageable. Errors in judgment, sudden extreme weather conditions, precipitate actions by vessels nearby or mechanical failures can instantly turn a routine transit into international headlines. It is during these circumstances that a Pilot's experience, training and calm judgment become the difference between catastrophe and "near miss." As Commissioners the responsibility to provide the resources necessary to employ the most capable pilots is yours. This is a challenge because the profession is largely invisible and frequently misunderstood. Misunderstandings arise due to the fact that those unfamiliar with the industry have difficulty digesting (i) the years of experience necessary to achieve the necessary qualifications, (ii) the degree of personal and financial risk involved to the individual pilot should he or she err, (iii) the very heavy shared financial expenses involved in operating pilot association and (iv) the onerous 24/7 lifestyle required for pilots on duty. Personal risk includes the extremely hazardous job requirement of manually ascending and descending the side of a vessel's hull to or from a pilot boat on an unstable rope and composite ladder in all weather conditions while both vessels are underway. In short, the job requires highly skilled and motivated, physically fit individuals of strong personal character. Such individuals are sought after by many. Puget Sound Pilots must compete to recruit and retain them. As a professional mariner who never developed the vocation to become a pilot, but who always held their skills in the highest esteem and who, like all mariners, understands their essential role in safe navigations and the flow of commerce, I urge you to carefully consider the rate proposals advocated by the Puget Sound Pilots. The basis for these proposals is fully documented. They reflect what is necessary to protect the pristine environment and essential economic activity of Washington State. Please approve these measures. Thank you for your consideration. Respectfully submitted,

			Captain Donald Marcus President Emeritus International Organization of Masters, Mates & Pilots
	Jeff Slesinger-Delphi Maritime	E-mail	Please accept the following comment regarding the proposed Tariff Increase (Docket TP-250574) Dear Commissioners and Executive Director of the UTC: I am writing to you in my individual capacity as a licensed mariner and the principal owner and operator of Delphi Maritime, LLC. I have had the privilege of developing and participating in mariner training and evaluation programs, including Marine Pilots from various geographic locations. The Puget Sound Pilots have one of the top-tier pilot training and evaluation programs. This is in response to the navigational complexities, challenging waterways, evolving port infrastructure and dramatic increase in vessel size unique to the Puget Sound Pilotage district. The District is one of the largest and most environmentally sensitive districts in the nation. It takes a highly trained, experienced pilot with specialized skills and intimate local knowledge to consistently and safely bring vessels in and out of the Puget Sound pilotage district. When a competent Puget Sound Pilot boards a ship, they represent much more value than shiphandling expertise. Billions in cargo trade and thousands of jobs are dependent on a vessel's seamless, safe and efficient transition from sea to port. Without a skilled Pilot on the bridge, that transition becomes a weak and vulnerable link between an arriving vessel and the downstream benefits of our region's maritime commerce and environmental health. Puget Sound Pilots are the keystone for both maritime commerce and environmental protection of our region. Investment in compensation and a professional work environment that attracts and retains the best of the best pays dividends to our region far beyond that of a competent mariner. Please consider the above and please contact me if you have any questions. Respectfully, Captain Jeffrey Slesinger -- Jeff Slesinger
	Captain Brett Marquis	E-mail	 To: WA State Utilities and Transportation Commission e-mail: comments@ute.wa.gov Ref Docket TP-250574

Good aftemoon,

I would like to take this opportunity to share my professional opinion regarding the job that is performed daily by members of the Puget Sound Pilots. If you don't work as a member of a ship's bridge team, it can be difficult to fully understand and appreciate the value a ship pilot brings to ship owners, terminal operators, and WA State Citizens in facilitating the safe and timely flow of commerce into and out of Puget Sound

As a professional Mariner for over 30 years, I sailed all over the world. Particularly pertinent to this rate case was the last 14 years of my career when I sailed as Master of a containership sailing in the Alaska Trade. In this capacity, I called the Port of Tacoma 2-3 times per month. Our stays in Tacoma were typically 18-24 hours during which time I was responsible for bunkering the vessel, ship repairs, mecting with any manner of regulatory bodies, and managing the expectations of the ship owners, managers, terminal operators, and freight customers. In a typical Tacoma port call we would tie up between Midnight and 6AM and then sail that same night around 11PM. I give you that schedule to illustrate how dependent I was on a competent pilot that could assist me in getting the vessel to the dock safely and efficiently and then off the dock and safely out to sea. WA State together with assistance from the Puget Sound Pilots have a top-notch training program, and their pilots are competent to pilot ships when they finish the program. I could count on them to know the complications of our transit, whether it be reduced visibility, strong: currents, traffic congestion, tug conflicts or windy conditions in the port. I always felt confident that when a Puget Sound Pilot boarded the ship, I was getting an asset to help me safely get the ship into or out of port in a timely manner

As a Deep Sea Master, I was certainly qualified to try my hand at piloting, and I considered it a time or two. The thought that I could potentially have a higher income and have more time at home was quite appealing. However, when you dig into the details it's not that appealing for most. By the time you begin sailing Master on an Unlimited tonnage vessel, you are probably in your 40's. To make the switch to become a pilot is quite arduous. You would have to dedicate significant time and resources to study for and pass the WA State exam. If you did pass and make the list, the training program is approximately 2-4 years, with a significant loss in income and no health or retirement benefits. There is no guarantee that the trainee will successfully complete the WA State training program. Think about that; 2-5 years of significant opportunity costs, no benefits, and at the height of the applicants' previous earning potential and retirement savings may not turn out as planned if they fail to pass the lengthy and demanding WA State training program. When you weigh these opportunity costs with the amount of responsibility and liability a pilot assumes with every job, I did not find the decision to pursue pilotage very appealing

			I am U.S. Coast Guard Academy graduate and prior to joining the U.S. Merchant Marine, I served on active duty in U.S. Coast Guard as an Officer responsible for Port State Control inspections. I know from that experience what safety records look like on both U.S. flagged and Foreign flagged vessels. We all think accidents like the M/V Dali striking the Francis Scott Key Bridge are anomalies, but they're not. Ships have mechanical issues, and as the pilot, you are responsible for the skill required to keep disaster from happening. One look at the public record of the WA State Board of Pilotage MSO's (Marine Safety Occurrence) here in Puget Sound, and you can easily see the history of mechanical and safety issues that these pilots must deal with. It doesn't matter what time it is or the age of the ship; the pilot has to deal with whatever adversity comes up I urge your Commission to seriously consider the evidence on National Average pilot compensation provided in this rate case. It takes years of seagoing experience to qualify for this job and a tremendous amount of skill, risk tolerance, and time to pursue a path to pilotage. Qualified pilot candidates have choices on where they work, and it is reasonable that financial compensation is taken into consideration when making the decision on where to be a pilot. If you are interested in a Pilot Organization that would attract a wider and more diverse pool of Professional Mariners candidates with 20+ years of seagoing experience, you really need to pay for it. I apologize if this is blunt, but it's the truth. Regards, Capt Brett Marquis 1/10/25
	Senator Liz Lovelett -40th LD | Anacortes	E-mail	Washington Utilities and Transportation Commission Attn: Jeff Killip, Executive Director and Secretary 621 Woodland Square Loop S.E. Lacey, WA 98503 Re: Docket 250574 - Puget Sound Pilots Tariff Dear Executive Director Killip and Commissioners: We write in support of appropriate adjustments to the Puget Sound Pilots tariff in Docket 250574. The Legislature directed Washington’s pilotage rates be set by the Utilities and Transportation Commission in a manner that is fair, just, reasonable, and sufficient to support safe and reliable pilotage

			service. Encouraging the Commission to give meaningful weight to the evidence in this rate-setting process is consistent with the support the Washington State Legislature has shown for the Puget Sound Pilots in protecting Puget Sound and the citizens of Washington. It is critical that Washington pilots are provided with comprehensive training, sufficient rest, and compensation that is competitive with other pilotage districts and states. Pilots carry extraordinary responsibilities: routinely boarding ships on exposed pilot ladders in all weather, accepting substantial personal and financial liability, and maneuvering increasingly large vessels through waterways and port infrastructure that were not designed for ships of today's size. Washington is among the most trade-dependent states in the nation; every loaded tanker, cruise ship, and deep-draft cargo vessel guided by a Puget Sound Pilot carries both economic opportunity and enormous risk for our coastal and tribal communities, fisheries, small businesses, and taxpayers. To safeguard these interests, the Commission should support a stable, well-funded pilotage system that is essential to the protection of Puget Sound. The beneficiaries of a safe, well-funded pilotage system are the people of Washington State whose waters and shorelines are protected from catastrophic incidents. The Commission should approve rates that are sufficient to attract and retain a robust, diverse, and highly qualified pilot corps capable of providing safe, reliable pilotage service in all conditions. Washington's economy and coastal environment depend on such a system. Thank you for your consideration of these comments and for your work on this important matter. Sincerely, Legislative Building Olympia, WA 98504-0600 Washington State Legislature
	Catherine Collins- Exec Dir. Sound Experience	E-mail	DATE: January 9, 2026 RE: Docket TP-250574 Puget Sound Pilots Rate Case Public Comments From: Catherine Collins, Executive Director Sound Experience Sound Experience is a nonprofit 501(c)(3) youth education organization that serves children and teens throughout the Puget Sound region with environmental and maritime programs. More than 30,000 children and teens have sailed

			aboard on day and overnight educational programs on-the-water since its inception in 1989. The organization partners with public and private schools throughout the Puget Sound region, and partners with community-based organizations such as Urban League of Metropolitan Seattle and Maritime Blue. Its education platform is the fully-restored National Historic Landmark (NHL) schooner Adventuress, one of only two NHL sailing ships still in active operation on the West Coast. Adventuress is a USCG-inspected commercial vessel and was named Puget Sound's official Environmental Tall Ship in 2016 by the Washington State Governor's office. We are submitting the following public comments in support of the Puget Sound Pilots rate increase case: Pilotage, environmental protection and youth education – Sound Experience's work depends on a Puget Sound that is safe and well managed. A major marine accident would directly affect our ability to deliver meaningful environmental education and youth programs on the water. Pilots are key to the safety system that allows busy commercial traffic and youth sail training programs to share the same waterways safely. Cultivating a future maritime workforce through education – Puget Sound Pilots regularly volunteer their time aboard Adventuress, working directly with teens – many of whom have never been on Puget Sound – to explain commercial shipping, marine safety, and real maritime career pathways. Their direct engagement adds a level of credibility that our shipboard crew of educators alone cannot provide. When a working Pilot shares their experience and accompanying lessons aboard Adventuress, students see clearly that this is a real job they could do, and that moment is often transformative. A reasonable increase with outsized public benefit – Pilots' expertise reduces risk, protects sensitive marine environments, and keeps maritime trade moving safely. A requested rate increase reflects the importance of pilotage to WA State's economy, to the environmental health of coastal communities, and to the work of organizations like ours that are dedicated to maritime workforce development and to our region's marine environment.

			Why competitive compensation matters – From my perspective leading youth maritime workforce development programs, pilotage must remain a sustainable and competitive career. When compensation and working conditions don't reflect the responsibility of the work, it's harder to encourage talented young people to pursue this path. Competitive pilot compensation is an investment in Washington's future maritime safety, workforce, and economic vitality.
	Jaimie C. Bever-Exec Dir. Wa State Bd. of Pilotage	E-mail	January 12, 2026 Jeff Killip Executive Director and Secretary Washington State Utilities and Transportation Commission P.O. Box 47250 Olympia, WA 98504-7250 RE: Docket No. TP-250574 – Puget Sound Pilotage District Tariff Revision 14 EXHIBITS ARE ATTACHED Dear Mr. Killip, The Board of Pilotage Commissioners (BPC)/Board) is Washington State's pilotage oversight agency. Our mission is to ensure against the loss of lives, loss of or damage to property and vessels, and to protect the marine environment by maintaining efficient and competent pilotage service in our state's inland waters. We administer testing, training, and licensing of maritime pilots. We are submitting this comment regarding Puget Sound Pilots' (PSP) proposed tariff revision to provide factual information about the BPC's process for establishing the number of pilots to provide efficient and competent pilotage. Attached to this letter are the following exhibits: 1. 2023 BPC Annual Report – EXHIBIT A 2. 2023 and 2024 BPC Annual Report – EXHIBIT B 3. 2024 BPC Meeting Minutes – EXHIBIT C 4. 2025 BPC Meeting Minutes – EXHIBIT D 5. Pilot Safety Committee (PSC) Target Assignment Level (TAL) Materials 1 – EXHIBIT E 6. PSC TAL Materials 2 – EXHIBIT F 7. PSC TAL Materials 3 – EXHIBIT G 8. PSC TAL Materials 4 – EXHIBIT H 9. PSC Meeting Minutes Regarding the TAL – EXHIBIT I 10. Document Summary of PSC TAL Work Sessions – EXHIBIT J 11. 2025 PSP Monthly Activity Reports – EXHIBIT K

12. 2024 BPC Key Performance Indicators Dashboard – EXHIBIT L
13. 2025 BPC Key Performance Indicators Dashboard – EXHIBIT M
14. 2019-2025 PSP Assignment Dashboard – EXHIBIT N

Maritime pilots are among the most experienced and skilled mariners in the industry. The knowledge required to become a pilot can only be acquired over the course of a career. As depicted on page 24 of the 2024 BPC Annual Report (Exhibit B), the pathway to pilotage is a long one, averaging 25 years from high school graduation to licensure. Consequently, the average age of a newly licensed pilot in Washington state is 43. And then it is another 5 years of upgrading to become an unlimited pilot able to pilot cruise ships and other larger vessels.

As provided for in WAC 363-116-065, "the Board will from time to time, set the number of pilots to be licensed in each pilotage district of the state that is best calculated to optimize the operation of a safe, fully regulated, efficient, and competent pilotage service". Furthermore, the Board utilizes this process to help determine the need for a pilot exam to replenish the training program wait list. Per rule, the Board may look at the following data to make such determinations:
(a) Policy of the state to ensure safety of persons, vessels, property and the environment by providing competent, efficient and regulated pilotage for vessels;
(b) The importance of the maritime industry to the state balanced by the potential hazards presented by the navigation of vessels requiring pilots;
(c) The lead time necessary to select and train new pilots;
(d) Regional maritime economic outlook, including without limitation: Current economic trends in the industry, fluctuations in the number of calls, the types of assignments, the size of vessels, the cyclical nature of the traffic and whether traffic is increasing or decreasing and the need to minimize shipping delays;
(e) Workload, assignment preparation and rest needs of pilots;
(f) Trends in size of piloted vessels;
(g) Time lost to injury and illness;
(h) Anticipated retirements;
(i) Administrative responsibilities, continuing education and training requirements consistent with the policy of chapter 88.16 RCW; and
(j) Surface transportation and travel time consumed in pilots getting to and from assignments.

While the Board must look at long-term trends with regard to potential licensures, pilot retirements must also be considered. The mandatory retirement age is 70. Our data shows that the average age of retirement is 64.

In 2023, the BPC's Pilot Safety Committee (PSC) was asked by the Board to re-evaluate the current Target Assignment Level (TAL) of 145 per pilot per year. The TAL was subsequently changed from 145 to 123 per recommendation by the PSC and adoption by the BPC. With the updated TAL of 123, the Board then increased the authorized number of pilots from 56 to 60 in 2024. The current number of authorized pilots in the Puget

			Sound Pilotage District is 60. As outlined above and attached, the BPC relies on factual information, trends, and forecasting to delicately balance the authorized number of pilots with the demand of industry and our responsibilities to provide safe and competent compulsory pilotage. Our 2025 Annual Report will be available at the end of August 2026. Please contact me at Sheri.Tonn@wsdot.wa.gov or our Executive Director Jaimie Bever at Jaimie.Bever@wsdot.wa.gov or 206-515-3887 if you have any questions regarding this process. Sincerely, Sheri J. Tonn Chair, Washington State Board of Pilotage Commissioners
	Steve Edwards Chair Swinomish Indian Tribal Comm.	E-mail	Dear Executive Director Killip and Commissioners: On behalf of the Swinomish Indian Tribal Community (Swinomish), we submit these comments in the above-referenced proceeding. Swinomish is a federally-recognized Indian tribe organized under Section 16 of the Indian Reorganization Act. Swinomish's governing body is comprised of 11 elected members who serve staggered five-year terms. Since time immemorial, the Tribe and its ancestors have occupied lands and waters in northern Puget Sound, including but not limited to the Skagit and Samish River systems, numerous islands including Fidalgo, Camano, Whidbey, and the San Juan Islands, and marine waters in the vicinity. The Tribe is an adjudicated successor-in-interest to certain tribes and bands of Indians that treated with the United States in the Treaty with the Duwamish, Suquamish, Etc., (1855) (Treaty of Point Elliott or Treaty). Pursuant to the Treaty, the Tribe ceded its interest in vast areas of land in Western Washington in exchange for certain rights guaranteed by the United States in perpetuity. Among other things, these include the right to exclusively use and occupy the Swinomish Indian Reservation, located on the peninsula at the southeastern end of Fidalgo Island, and the right to engage in fishing, hunting, and gathering in the Tribe's usual and accustomed fishing areas and on open and unclaimed lands. The State of Washington has an ongoing responsibility to respect and protect those rights, including by protecting the habitats on which our fisheries depend. Many of our usual and accustomed fishing areas lie directly alongside or within the deep-draft shipping routes of Puget Sound and the broader Salish Sea. Laden tankers, container vessels, and cruise ships move through places where our tribal fishers set crab pots, nets, and lines, and where our communities rely on healthy salmon, crab, shellfish, and other resources. A major collision, grounding, or oil spill in these waters would fall first and hardest on treaty-

			protected resources and the tribal communities whose cultures and economies are tied to them. For Swinomish, this is not an abstract concern. We work in small boats, often in poor weather, in the same channels and anchorages used by large commercial vessels. When ship traffic is not well managed, the risk of close calls, collisions, and gear loss increases. A pilotage system that ensures large vessels are guided by mariners who understand local conditions, tribal seasons and openers, and where tribal boats and gear are likely to be present is an important layer of protection for the safety of our people on the water. Within this reality, state-licensed Puget Sound Pilots are one of the primary safeguards that work to prevent a catastrophic incident. When they take a vessel, they accept serious personal risk and responsibility: climbing pilot ladders in rough weather, navigating large ships in narrow and congested waterways, and working with port infrastructure that was built for much smaller vessels than those calling today. We understand that your docket includes a national study demonstrating that the Puget Sound Pilots receive lower income than pilots in many other state regulated districts, even though they are responsible for guiding large, high consequences vessels through some of the most environmentally sensitive and heavily used waters on the West Coast. A pilotage system that is chronically under-resourced increases long- term risk to our treaty rights and to the safety of our fishers. If pilotage is not funded at a level that supports a full complement of experienced, well-trained pilots, the likelihood and consequences of a serious incident in or near our usual and accustomed fishing areas are brought closer to reality. That outcome would be inconsistent with the commitments made in the Treaty of Point Elliott and the obligations recognized in the Boldt decision. For these reasons, we respectfully urge the Commission to: 1.Set pilotage charges at a level that reflects the seriousness of the risks Puget Sound Pilots manage, and the evidence in this record that current compensation does not match the responsibilities placed upon them. 2.Ensure that revenues from the pilotage tariff are adequate to sustain a strong, stable pilot workforce over time, so that safe pilotage continues to function as a real safeguard for treaty-protected fisheries, usual and accustomed fishing areas, Tribal lands, and the safety of tribal fishers working alongside deep-draft traffic.

			3.Explicitly recognize, in this and future pilotage decisions, that protecting the Salish Sea and Puget Sound, including tribal fishing areas reserved under the Treaty of Point Elliott is a central public-interest consideration when evaluating pilotage rates. We appreciate the opportunity to provide these comments and are committed to continuing to work with the Commission, Puget Sound Pilots, and other state and local partners on measures that reduce the risks to our treaty fisheries and to the people who depend on them. Respectfully, Steve Edwards, Chairman
	John Wolfe Chief Exec Off NW Seaport Alliance	E-mail	January 13, 2026 Washington Utilities and Transportation Commission P.O. Box 47250 Olympia, WA 98504 Submitted via email: comments@utc.wa.gov RE: Puget Sound Pilots (PSP) Request for Increase in Pilotage Rates, Docket number: TP-250574 Dear Commissioners, On behalf of The Northwest Seaport Alliance (NWSA), we are writing to encourage you to determine if it is necessary to increase pilotage rates for our region to maintain safe and efficient operations carefully balancing the implications on the intense competitive nature of our industry. We appreciate the opportunity to provide these comments. Formed in 2015, NWSA is a unique marine cargo operating partnership between the ports of Seattle and Tacoma. Marine cargo activity at NWSA operations annually supports approximately 52,100 jobs, including 18,000 direct jobs, $4.4 billion in total wages and benefits, and nearly $14 billion in total business output throughout the state of Washington. We are one of the largest container port complexes in North America and the primary container port for the Pacific Northwest. We also have substantial breakbulk, auto, military, and project cargo operations.

			The NWSA was formed to strengthen the Puget Sound gateway and attract marine cargo and jobs for our region - a benefit for the entire state. In unifying the management of marine cargo facilities within Puget Sound, we are better positioned to face the extraordinarily competitive international container industry. Given we are largely a discretionary gateway, we must fight even harder to remain competitive and maintain our market share. We cannot do it alone - our partnerships throughout the supply chain are critical to our success, including the Puget Sound Pilots (PSP), ocean carriers, marine terminal operators, labor partners and many more. The NWSA has our own role in driving growth and regional efficiencies. We continue to explore opportunities to do just that through our landside trucker experience efforts and cargo incentive programs among other endeavors. In conjunction with the U.S. Coast Guard, PSP is a vital partner in preserving the positive safety record for the region - a requirement for us to be competitive. Beyond their core function in piloting vessels through miles of ecologically, economically and culturally significant waters and safely to berth, we rely on them to inform various aspects of our capital development program to ensure terminal and waterway designs that fully address safety requirements while also providing the best possible facilities for our customers. More broadly, we believe that a robust roster of experienced pilots is critical for the collective success of our gateway. We support the continuation of a strong pilot training program that continues to attract highly qualified mariners safely and efficiently serving our supply chain. We recognize the demanding nature of the pilots' work, rely on them for the success of our gateway, and all must be appropriately balanced with our regional and state economic need to remain competitive in an extraordinarily challenging marketplace. We have many partners in the supply chain, including our marine terminal operators who must compete to attract ocean carriers to their docks. Competitive costs and first-class service are significant drivers that allow us to differentiate our gateway from other competing gateways. As the proceedings for this increase unfold, we hope you will keep these critical points in mind. We encourage you to increase the pilotage tariff if you deem it necessary to support a safe, sustainable, efficient and competitive gateway. Thank you for your consideration, John Wolfe Chief Executive Officer The Northwest Seaport Alliance
	Jake Beattie CEO NW Maritime	E-mail	To the Washington State Utilities and Transportation Commission, Washington's geographic positioning and protective coastline position us incredibly

well to facilitate global trade through overseas shipping. The health of and efficiency of our Ports facilitate not just the prosperity of our coastal communities but the well being of our entire state.

The lynchpin of all of that activity are the skilled and dedicated men and women of the Puget Sound Pilots, who have been facilitating our region's trade and mitigating environmental damage since 1935.

I am submitting this letter of support for the proposed rate increase for the Puget Sound Pilots. for their proposed rate increase for three primary reasons:

. Invest in Washington's prosperity: Washington's economy is an export economy. Apples can't get to overseas markets without ports, ships, and the highly trained professionals that make it all happen. Pilots, like the rest of our maritime sector, make it possible for the entire state to thrive.

. Keep Washington's coastline pristine: Our ocean coast and the Salish Sea are fragile and vibrant ecosystems with everything from endangered Orca whales to a multibillion dollar aquaculture industry that feeds the world. All of that is at risk if a significant oil spill were to occur. We have spill response resources, but the Puget Sound Pilots are our first line of defense. By skillfully keeping tankers full of crude and other commercial vessels safely "between the beaches" they prevent the spills from happening in the first place. A recent study from 2017 by Canadian Transport Economics & Management found that: "Pilotage is the strongest single safety measure that can be employed to reduce the risk of maritime accidents." reducing accident risk by a factor of 44.

. Keep Washington competitive: To accomplish goals one and two we need the talent to guide these boat loads of apples, aircraft, and seafood out of our waters, trouble free. We need Pilots, and given the volume of traffic, the complexities of our waters, and the environmental consequences that would result from a maritime accident- we need the best. To attract and retain that caliber we need wages that are competitive with the rest of the country.

According to the record in the docket, Puget Sound Pilots are among the lowest paid pilot groups in the U.S. Our waters are complicated, our ecosystem is fragile, and with so much of our economic and environmental health resting in the hands of so few it just makes sense to invest in the humans that drive results. Delaying this

			investment will exacerbate the maritime "brain drain" as our top talent will continue to be poached out of the area. This isn't the only investment we need to make in this critical sector, but it is perhaps the most cost effective way to ensure our state's long-term prosperity. Thank you for your support of our Pilots, our economy, and our environment. Sincerely, Jake Beattie CEO
	Dan Worra Former Exec Director, Port of Anacortes	E-mail	Dan Worra February 9, 2026 Washington Utilities and Transportation Commission P.O. Box 47250 Olympia, WA 98504 Re: Comment on Puget Sound Pilots Tariff - Docket 250574 Dear Commissioners: My name is Dan Worra. I am the former Executive Director of the Port of Anacortes and a retired United States Navy officer, with 24 years of service, including seven years sea and eight years on Washington's working waterfront. From both perspectives, I have seen how much our ports rely on Puget Sound Pilots to keep ship movements safe. Large vessels operating in confined waters leave little margin for error. A local pilot on the bridge is often the factor that keeps a routine transit from becoming an incident. That safety foundation is also an economic one. Ports, shippers, and communities depend on predictable, uninterrupted vessel calls. A serious grounding, collision, or spill in Puget Sound would not only generate large insurance claims, it would disrupt cargo flows, damage reputations, and affect jobs and tax revenues for years. Recent events such as the collapse of the Francis Scott Key Bridge in Baltimore are a reminder of how a single casualty can affect an entire region's economy. Against that backdrop, pilotage charges are small. On a typical ship call, the pilot's bill is a modest fraction of the total port call cost and an even smaller fraction of the value of the ship and cargo. By comparison, the cost of one major casualty would overwhelm many years of savings from holding pilotage rates down. Ports and pilots are ultimately on the same side. Both depend on safe access, reliable schedules, and long-term confidence in Puget Sound as a place to do business. In my view, it is short-sighted for ports or their customers to push for lower pilot compensation in ways that could weaken that system.

			My years in senior management have reinforced a simple lesson: you do not get or keep a highly skilled workforce in a demanding, high-responsibility job without competitive compensation. If Washington wants enough experienced mariners willing to take on the risks and responsibilities of being pilots, their pay needs to reflect that reality. As you consider Docket 250574, I urge you to recognize the safety and economic value that Puget Sound Pilots provide, the relatively small share of total costs that pilotage represents on a modern vessel call, and the need for compensation levels that sustain a strong, stable pilotage system for the long term. Thank you for the opportunity to comment. Sincerely, Dan Worra Former Executive Director, Port of Anacortes Commander, U.S. Navy (Ret.)
	John McCarthy Port of Tacoma Commissioner	E-mail	Jan 8, 2026 Washington Utilities and Transportation Commission (UTC) 621 Woodland Square Loop SE Lacey, WA 98503 Dear Commissioners and Executive Director of the UTC: I am a Commissioner of the Port of Tacoma and the Northwest Seaport Alliance and have served in this capacity for many years. I am writing to you in my individual capacity as a Port Commissioner. I am writing to express my personal support for establishing PSP's pilotage rates in an amount which is comparable to those set around the United States in similar major Ports with similar navigational challenges including vessel sizes and other complicating factors. We are one of the top seven gateways in the United States. I have travelled with Pilots on their journeys in the Puget Sound with large vessels to major Port facilities handling international trade. Just recently, 12/22/2025, I boarded the Evergreen Line "Ever More" in transit to its destination at the Port of Tacoma, up the Blair waterway for two miles, to Evergreen's terminal. This vessel is approximately a 16,500 TEU vessel, 1200 feet by 167 feet with a 43-foot draft and a wind sail area of

			16,500 square meters. This is one of the largest vessels to call in our gateway. The wind we experienced on 12/22 was 20-25 knots. As the vessel traveled up the two-mile waterway, there were other moored cargo vessels along the side of the waterway that were working gantry cranes on other terminals near the ship as we slowly moved up the waterway. This is truly the heart of our very important international trade in Washington State. I served on the Port Commission when we were able to attract Evergreen Line to the Port of Tacoma over 35 years ago, in 1991. Evergreen Shipping Agency (American) Corporation recognized the Puget Sound Pilots as their Marine Vendor of the year in 2018. We are very proud of our long-term partnership with Evergreen and very proud of the work the Pilots have done in making sure the vessels have transited safely so we could maintain that partnership. I spoke at length with the Evergreen captain on 12/22. He discussed the navigational challenges this important terminal presented as compared to other terminals and waterways they navigate around the world. It requires skilled pilotage. It truly takes the absolute best Pilots in the World to get our import and export cargo to many of our terminals. I cannot understate the absolute value the Pilots bring to our ability to operate our Ports in Washington State and bring jobs to our economy. Billions of dollars of cargo are shipped thru our Ports and over 43,000 jobs are created thru NWSA marine trade. I also share the concerns they have expressed about personal safety considerations they encounter as: they climb a rope ladder to enter these large vessels in transit and I understand that they also have potential financial liability exposure and responsibility for American flag ships in the event of error. Please consider the above and please contact me if you have any questions. Sincerely, John McCarthy Port of Tacoma Commissioner (253) 365-7498
	Kristen LeMieux asst. to Sen. Haugen	E-mail	March 14, 2026 Washington Utilities and Transportation Commission Executive Director Killip and Commissioners P.O. Box 47250 Olympia, WA 98504

Re: Docket TP-250574 - Puget Sound Pilots General Rate Case

Dear Executive Director Killip and Commissioners,

Today, I write to you in support of the Puget Sound Pilots' request for rates that reflect competitive pilot compensation, provide for the funding of established retirement obligations, and preserve the stability of our region's pilotage system.

To introduce myself, I am Mary Margaret Haugen. I served in the Washington State Legislature for thirty years, including as Chair of the Senate Transportation Committee. During that time, I worked extensively on transportation and maritime policy affecting Washington's waters, ports, and pilotage system. I was a sponsor of Substitute Senate Bill 5150 (2005), which reformed pilot licensing requirements to broaden recruitment beyond Washington State. I was also the prime sponsor of Senate Bill 6095 (2009), which addressed the inclusion of pilot retirement costs in the tariff.

I write in strong support of Puget Sound Pilots. The Legislature has already made clear that Washington's pilotage system must be able to recruit from a national pool of highly qualified mariners. Through SSB 5150, we deliberately removed barriers that had limited access to mariners from out of state. We did this to broaden the pool of applicants as part of our efforts to ensure that Washington could attract the best candidates available, regardless of where they reside.

That policy decision carries a straightforward implication: if Washington expects to compete nationally for pilots, it must offer compensation that is competitive on a national

basis. A system designed to recruit nationally cannot function as intended if compensation is set well below the national market.

I am deeply concerned by proposals advanced in this proceeding that would eliminate or defund existing retirement obligations. As the prime sponsor of SB 6095, I worked to ensure that pilot retirement costs could be supported through the tariff as part of a stable and functioning pilotage system. Those obligations were understood, relied upon, and supported over many years.

Efforts to now shift those obligations away from the tariff and onto the backs of working pilots are unacceptable. They are inconsistent with the framework the Legislature established and, in my view, fundamentally unfair. They would also risk destabilizing the

			pilotage system by undermining the financial structure that supports it. For these reasons, I urge the Commission to approve rates that provide competitive, nationally benchmarked compensation, ensure the continued funding through the tariff of long-standing retirement obligations, and preserve the integrity of Washington's pilotage system. Our pilots deserve the highest level of support and respect for their level of professionalism and record of safety, all while managing challenging waterways, an incredibly diverse system of traffic and the concerning threat of environmental impacts to our maritime systems. Thank you for the opportunity to share my strongest support for the Puget Sound Pilots. Sincerely, Senator Mary Margaret Haugen Former Chair, Senate Transportation Committee Washington State Legislature, 1982-2012
	Amanda Dainis, PhD	Web	I am an Industrial / Organizational Psychometrician, and my firm is working with multiple pilotage groups in the US conducting training program reviews / revisions and selection assessment processes. In our work conducting job task analyses (aka Practice Analyses or Role Delineation Studies) in five districts, it has become apparent that the core responsibilities, skills, and abilities are similar across the groups. Although the local geography may be different, the responsibility level and the experience required is comparable, as the compensation should be. In fact, some districts in which pilots currently earn more compensation than those in Puget Sound do not require all of the extended specialized skillsets (e.g. extensive shiphandling with tugs) that the Puget Sound Pilots (PSP) must master. The complexities of the PSP job role, combined with its immense responsibility and corresponding poor-performance consequences, makes it one of the most impactful, elite, and high-stress occupations I have encountered in my 18-year career. However, comparison of the PSP role to other occupations I have worked with (e.g. medical professionals, law enforcement, etc.) is not particularly helpful with regard to compensation. This is why the comparable data collected by the PSP study is key to illustrating the disparity in their pay. Such disparity can have long-term impacts on the ability of PSP to attract and employ qualified mariners that have the abilities necessary to pilot safely and effectively in Puget Sound. They are, after all, getting applicants from a small pool of elite mariners... the same pool that is being recruited by multiple other pilotage groups. Therefore, the disparity can directly lead to negative impacts on the safety of the public, the environment, and the commercial cargo (and its revenue) in Puget Sound.