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STATE OF WASH.  
UTIL. & TRANSP. COMMISSION

Washington Utilities and Transportation Committee  
621 Woodland Square Loop SE  
Lacey, WA 98503

December 16<sup>th</sup>, 2019

**RE: Docket TP-190976**

Dear UTC Commissioners and Staff,

As you know, pilotage in Washington State is regulated by the Washington State Pilotage Act (RCW 88.16). Unless otherwise exempt, every foreign-flagged vessel is subject to compulsory pilotage while in the Washington State Pilotage Districts, defined to include *"all the waters of the state of Washington inside the international boundary line between the state of Washington, the United States and the province of British Columbia, Canada and east of one hundred twenty three degrees twenty four minutes west longitude"* (RCW 88.16.050).

In my capacity as a yacht agent, I provide a broad suite of logistics and other services to foreign-flagged recreational vessels while operating in the Washington State Pilotage Districts. These services include booking pilotage services through the Puget Sound Pilots (PSP) as well as petitioning for pilotage exemptions through the Washington State Board of Pilotage Commission (BPC). I am a regular attendee at BPC meetings given my clients vested interest in the exemption process as well as the tariff rates they are subject to.

With the 2018 passage of SSB 6519 and its subsequent signature by Governor Inslee, pilotage rate setting authority was transferred from the BPC to the UTC, effective July 1, 2019. The BPC process has always been accommodating of and inclusive of the recreational boating community perspective. As a representative of this community, I request the UTC afford recreational boating a similar "seat at the table" in the rate-making process under the UTC. We note various other affected stakeholders, including the Pacific Merchant Shipping Association (PMSA), have already petitioned for inclusion in the process.

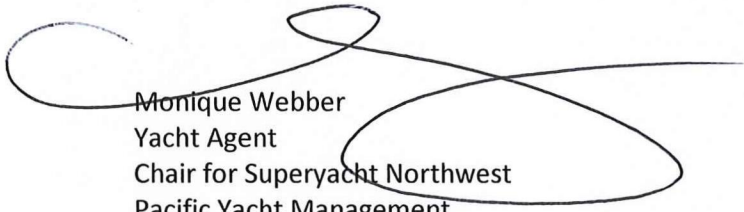
To demonstrate the legitimacy of this request, I offer the following information regarding the number of pilotage assignments, as well as revenue earned by the Puget Sound Pilots (PSP) through provision of pilotage services to the recreational boating user group:

2019-20 assignments with a total cost of \$39,653.75  
2018- 20 assignments with a total cost of \$38,100.25  
2017- 8 assignments with a total cost of \$17,414.75

Please note these figures represent only the assignments booked by Pacific Yacht Management on behalf of its clients. As such, these figures under-represent the true magnitude of the issue to the recreational boating community. But you can clearly see the number of pilotage assignments for recreational vessels has increased dramatically over the past several years. This trend of increasing recreational vessel visits to the Washington State Pilotage District is expected to continue in the next several years as a result of the 2020 Tokyo Olympics, the 2021 America's Cup in New Zealand, the 2022 Beijing Olympics, and the 2028 Los Angeles Olympics.

In closing, I wish to reiterate my request that the recreational boating community be provided a "seat at the table" during the UTC pilotage rate-setting process. In addition to the pilotage assignments (and associated pilot revenue) noted above, recreational boating contributes more than \$7 billion annually to the Washington State economy while providing more than 12,000 direct jobs. I look forward to further conversation with the UTC and would be happy to answer any questions. Thank you in advance for considering this request.

Sincerely,



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