



STATE OF WASHINGTON
BOARD OF PILOTAGE COMMISSIONERS

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

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March 27, 2025

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Puget Sound Pilots

Attn: President Ivan Carlson

2003 Western Ave, Suite 200

Seattle, WA 98121

Via email: president@pspilots.org

Re: 88.16.180 RCW Enforcement – Request for Information

Dear Captain Carlson,

As you are aware, the mission of the Board of Pilotage Commissioners (BPC) is to protect against the loss of lives, loss of or damage to property and vessels, and to protect the marine environment by maintaining efficient and competent compulsory pilotage services in Washington State, and to not put in jeopardy Washington's position as an able competitor of waterborne commerce from other ports and nations of the world, but rather to continue to develop and encourage such commerce.

We acknowledge the request made by your attorney, Sheree Carson, Perkins Coie, via a letter dated March 14, 2025, that "no later than the April Board meeting, the Board provide its determination of how the statute is to be carried out and provide all the rationale supporting the Board's determination".

Given the BPC's mission of safety, environmental protection, and efficiency, the BPC requests of PSP, no later than end-of-business March 31, 2025, to provide to BPC staff via email an explanation of the following items:

1. How does enforcing 88.16.180 RCW by requiring US pilots on Canada-bound tankers in US waters, thus eliminating a 50-year practice, address each of these critical components of the BPC's mission: Safety, Environmental Protection, and Efficiency?
2. What are the risks PSP is generating by requesting the BPC enforce the statute as written?

3. How can PSP meet the requirement of additional pilotage assignments without negatively impacting the pilotage system, including delays in Puget Sound?

The BPC will be calling a Special Meeting of the Board set for April 3, 2025, 0900-1100. There will be a Closed Session prior to the public portion of the meeting. This Special Meeting is the reason for the request above.

We look forward to your submission and discussing this further.

Sincerely,

A handwritten signature in blue ink, appearing to read "Sheri Tonn", followed by a horizontal line.

Sheri Tonn, Chair

Cc Scott Brewen, Executive Director, Puget Sound Pilots
 Board of Pilotage Commissioners
 Albert Wang, AAG