



April 15, 2025

Senator Tim Nangle (Chair)
Committee on Transportation
Maine Senate and Maine House of Representatives
2 and 3 State House Station
Augusta, Maine 04333

RE: LD 1477 "An Act to Provide an Exemption from Pilotage Requirements for Passenger Ferry Service Between Bar Harbor, Maine and Yarmouth, Nova Scotia"

Dear Senator Nangle and Members of the Transportation Committee,

We, the undersigned, are writing in opposition to LD 1477. By way of background, each of us is a Coast Guard licensed captain who operates inspected passenger vessels on a year round basis in Casco Bay. We are members of the Maine Marine Association (a collective bargaining group) and employed by Casco Bay Lines. We transport well over 1,000,000 passengers throughout Portland Harbor and Casco Bay on an annual basis. The Subchapter K vessels we operate are certificated to carry up to 399 passengers and, depending upon the season, the service operates between 18.5 and 20 hours per day.

Maintaining current pilotage laws in all ports of the State of Maine is crucial to ensuring the safety of our state's waterways. Allowing an exemption to any vessel, particularly a vessel which transits State waters at speeds of nearly 40 knots, four times that of other commercial vessels, conveys the message that Maine is not concerned with supporting the highest level of navigational safety and oversight of shipping companies. We are concerned that any pilotage exemption in another port will eventually open the door for similar legislation in Portland, legislation that has failed in the past.

Portland Harbor is an extremely busy and, often, congested waterway. The universe of vessels transiting the Harbor includes oil tankers, tugs and barges, container ships, windjammers, fishing vessels, large yachts, pleasure craft, kayaks, paddle boards, sailing vessels, ferries and tour boats. Given this level of activity, and in concert with the fragile ecosystem in Casco Bay, we believe ensuring a state licensed pilot is onboard every foreign vessel and every American vessel under register, with a draft of 9 feet or more, entering or departing from any port or harbor within the waters as defined under the current statute is imperative in order to provide maximum safety and preserve and protect lives, property and the environment.

Please note that State licensed pilots protect and act in the public's interest and are independent of the chain of command aboard ships, unlike a federally licensed pilot, who

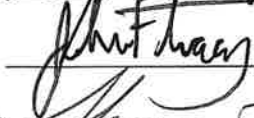
has no obligation to the State. Consequently, these state licensed pilots serve the State, its residents and all public interests – not the vessel or her owner/operator. This is a standard that is in place throughout the country. Very careful consideration must be given to all potential unintended consequences that could result from the granting of an exemption to compulsory pilotage. Maine should continue to lead, as it has done on so many other issues, and not permit any diminution whatsoever of the level of maritime safety and security currently in place. For the reasons stated above, we urge you to vote against LD 1477.

Thank you for your consideration,

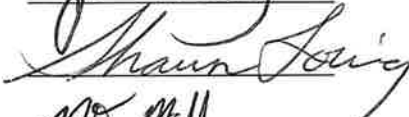
Capt. Eugene Willard



Capt. John Tracy



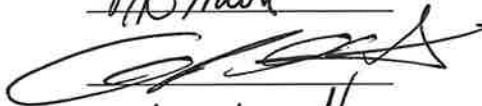
Capt. Shawn Loring



Capt. Nathan Mills



Capt. Andrew Gildart



Capt. Patrick Nixon



Capt. Gregory Mitchell



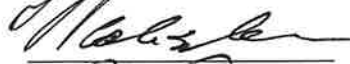
Capt. Nicholas Ferrara



Capt. Jeff Legere



Capt. Colin Anderson



Capt. Patrick Donovan



Capt. Cooper Collins

