

Request for Consultant Engagement

Subject: Request for Independent Review and Revision of the Port of Tacoma Commission Code of Governance and Conduct

To: Port of Tacoma Commission

From: Deanna Keller

Date: November 18, 2025

Purpose

The current Code of Governance and Conduct for Port Commissioners (adopted February 17, 2022) establishes important principles of ethics and accountability. However, its enforcement provisions rely solely on the Commission itself to investigate and discipline its members. This structure presents inherent limitations, as governing bodies often struggle to impartially govern their own conduct.

To strengthen public trust and align with best practices observed in other local governments, I respectfully request that the Commission engage a qualified third-party consultant to review and revise the Code.

Rationale

- **Structural Weakness:** The Commission currently investigates alleged violations internally, which risks perceptions of bias and undermines credibility.
- **Comparative Practice:** Many local governments and public agencies utilize independent ethics boards, ombuds offices, or external investigators to ensure impartiality.
- **Public Confidence:** An external review would demonstrate the Commission's commitment to transparency, accountability, and institutional integrity.
- **Governance Effectiveness:** Commissioners should focus on policy and oversight, not on adjudicating one another's conduct.

Requested Action

1. Engage a third-party consultant with expertise in public governance, ethics, and institutional accountability.

2. Direct the consultant to review the existing Code and recommend revisions that:•
Establish an independent mechanism for investigating alleged violations.

- Define clear enforcement procedures that protect both due process and public confidence.
- Align Port of Tacoma governance standards with those of comparable public institutions.

3. Present the consultant's recommendations for Commission consideration in a public meeting, ensuring transparency and community input.

Conclusion

The Port of Tacoma Commission has taken an important step by adopting a Code of Governance and Conduct. To ensure this Code carries meaningful weight and reflects modern standards of accountability, it is essential to involve an independent third party in its revision. Doing so will strengthen institutional integrity, safeguard public trust, and reinforce the Commission's role as a model of responsible governance.

Respectfully submitted,

Deanna Keller, Port of Tacoma Commissioner