

January 5, 2026

Allen Garfinkle, Executive Director
Board of Pilot Commissioners for the
Bays of San Francisco, San Pablo, and Suisun
660 Davis Street
San Francisco, California 94111
Delivered via e-mail to: bopc@bopc.ca.gov

RE: Support for Proposed Rulemaking for Pilotage Rate Setting Process

Dear Executive Director Garfinkle,

On behalf of the Pacific Merchant Shipping Association (PMSA), including ocean carriers conducting business at ports within the San Francisco pilotage district, we support the proposed rulemaking related to pilotage rate setting process as authorized by Harbors and Navigation Code (HNC) § 1250.

Specifically, we support the proposed amendment to §236 Rate Hearing Procedures and adoption of §§ 236.5 Adoption and Publication of Pilotage Rates, 236.6 Duties of the Executive Director, 236.7 Ex Parte Communications, 236.8 Objections to Standing, and 236.9 Hearing Initiated by Board Action within the California Code of Regulations, Title 7, Harbors and Navigation, Division 2, State Board of Pilot Commissioners for the Bays of San Francisco, San Pablo and Suisun. We are confident that these amendments codify the provisions authorized by Harbors & Navigation Code §1250 and will ensure a process that balances the interests of all stakeholders, provides clear direction and procedures and reduces ambiguities that could delay or distract from the important work of the Pilots and the Commission.

PMSA has been engaged with the Board and the Legislature in the development of this new rate setting process for several years, as well as in coordination with the San Francisco Bar Pilots (SFBP). We thank all of the parties for the opportunity to help to develop the proposed process.

For the record, PMSA does not request a public comment hearing on this proposed rulemaking.

Sincerely,



Jen Cohen
Vice President