



March 6, 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 Modifications to Regulatory Action Regarding the Pilotage Rate Setting Process

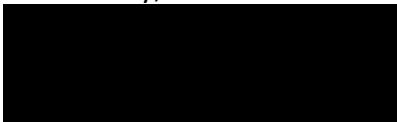
Dear Executive Director Garfinkle,

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 modifications to the proposed regulatory action regarding the pilotage rate setting process as authorized by Harbors and Navigation Code (HNC) § 1250.

Specifically, we are in support the modifications proposed in the March 5, 2026 “Revised Express Terms” related to the BOPC Pilotage Rate Setting Process. We were in support of the November 21, 2025 amendments 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 the newly proposed modifications further clarify the provisions authorized by Harbors & Navigation Code §1250.

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

Sincerely,



Jen Cohen
Vice President