



**Dennis Bolt**

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August 23, 2007

Captain Patrick A. Moloney  
Executive Director  
Board of Pilot Commissioners for the Bays of  
San Francisco, San Pablo, and Suisun  
Pier 9, Suite 102  
San Francisco, CA 94111

**RE: Public Hearing on Amendments to TITLE 7, Calif. Code of Regulations, Division 2**

**PMSA letter to Captain Patrick A. Moloney, July 23, 2007: "Submittal of  
Comments – Proposed Regulation for Pilot Pension Benefit Calculations at Sec 238"**

**SF Bar Pilots letter to Board of Pilot Commissioners, Aug 16, 2007: "Proposed Pilot  
Benefit Regulations"**

Dear Captain Moloney:

The Western States Petroleum Association (WSPA) is a trade association that represents the companies and other entities that conduct most of the petroleum-related operations in the western United States. These operations include production, transportation, refining, and marketing of petroleum and petroleum-based products. WSPA members operate marine tank vessels in the bays under the jurisdiction of the Board of Pilot Commissioners and have interest in the referenced public hearing. We appreciate the Board considering these comments in their deliberations on August 23, 2007.

WSPA is aware of the positions expressed in the letters from the Pacific Maritime Shipping Association and separately from the San Francisco Bar Pilots. There are considerable gaps in these respective positions on the regulatory amendments being proposed. WSPA submits that the Board SHOULD NOT adopt these regulations at this time, given the differences existing between these affected parties. In the alternative, WSPA requests that the Board refer the proposed amendments to the appropriate committee or workgroup to review these differences in an effort at reconciling them.

WSPA believes that the interests of the Board and all parties are best served by this deliberative process, which preserves the options for the Board in adopting a final regulation, while at the same time allowing affected parties the opportunity to work toward a resolution. WSPA stands ready to participate in a constructive way to work toward a clear and amenable resolution of the outstanding issues. Thank you for your time and consideration in this matter.

Sincerely,

WESTERN STATES PETROLEUM ASSOCIATION

Transmitted Electronically by:

Dennis Bolt  
Manager, Bay Area Region