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July 6, 2016

Brian Kelly  
Secretary  
California State Transportation Agency  
915 Capitol Mall #350b  
Sacramento, CA 95814

***Subject: California Sustainable Freight Action Plan***

Dear Secretary Kelly:

We are writing on behalf of International Longshore and Warehouse Union, Local 13, Local 63 and Local 94. We thank you for the opportunity to provide comments on the discussion draft of the California Sustainable Freight Action Plan (“Action Plan”) and we urge that jobs at the ports are protected as the Action Plan is developed by the California Transportation Agency and the other agencies involved.

The International Longshore and Warehouse Union (“ILWU”) represents port workers in California, Oregon, Washington, Alaska and Hawaii, as well as warehouse, maritime, agriculture and hotel and resort workers. The ILWU’s membership includes the approximately 22,000 longshore workers, marine clerks and foremen who load, unload, track, monitor and oversee the movement of cargo into and out of all of the major ports on the West Coast, Alaska and Hawaii. ILWU Locals 13, 63 and 94 represent these longshore workers, marine clerks and foremen in the Ports of Los Angeles and Long Beach.

We are in support of improving the efficiency and the competitiveness of California’s freight system. We are also in support improving the air quality in the communities in which our families live and work. However, we have serious concerns with the emphasis of the California Sustainable Freight Action Plan on broad deployment of zero and near zero-emission vehicles and equipment.

Zero or near zero-emission equipment is, in almost all cases, electric equipment. When it comes to California’s ports, a transition to such equipment means, in an overwhelming majority of cases, a transition to automated or manless equipment. Legislation and funding supporting the transition to zero or near zero-emission equipment used in conjunction with the movement of goods and freight in California ports puts California ports on the fast track to automation which all but guarantees the loss of solid middle class jobs.

The adoption of zero or near zero-emission equipment has already harmed the work opportunity of the longshore workforce in California. For example, at Long Beach Container Terminal in Long Beach and TraPac in Los Angeles, trucks and cranes driven at other terminals by longshore workers who receive health care, pension benefits and solid wages are now driverless automated machines. We would estimate that the combined result of this automation at Long Beach Container Terminal and TraPac is a reduction of over 1000 workers ordered per shift to handle cargo when ships are docked. Since up to three shifts can be scheduled per day, the reduction in jobs ordered daily at these new automated terminals can be by several thousand.

ILWU Locals 13, 63 and 94 recommend that the State agencies, in considering specific investments policies and programs related to California's freight transport system, consider the devastating impact the transition to automated zero and near zero-emission vehicles and equipment at California's ports will have on jobs and the economy in the port communities. While ILWU Locals 13, 63 and 94 support efforts to keep the air in port communities clean, the benefits that could result will be diminished by the economic distress that will result in the same communities when our members are replaced by "clean" machines and therefore can no longer provide for their families or stimulate the local economy. Of course, ILWU Locals 13, 63 and 94 do not oppose the transition to zero and near zero-emission vehicles and equipment that require the same amount of human intervention to be operated and maintained as current vehicles and equipment at the ports.

ILWU Locals 13, 63 and 94 also recommend that to the extent the State agencies do considering specific investments, policies and programs that encourage the transition to zero or near zero-emission vehicles and equipment related to the freight transport system, the State agencies require that such vehicles and equipment be manufactured in the United States. Such requirement will encourage job growth in the manufacturing sector in California and the rest of the country.

Thank you for your consideration.



Robert Olvera, Jr.  
*President*  
Local 13



Paul Trani  
*President*  
Local 63



Daniel G. Miranda  
*President*  
Local 94