



INTERNATIONAL LONGSHORE & WAREHOUSE UNION COAST LONGSHORE DIVISION

Robert McEllrath Ray Familathe Frank Ponce De Leon Cam Williams

July 5, 2016

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

Subject: California Sustainable Freight Action Plan

Secretary Kelly:

We are writing on behalf of the Coast Longshore Division of the International Longshore and Warehouse Union (“ILWU”) to provide our comments regarding the California Sustainable Freight Action Plan.

The ILWU represents over 20,000 longshore workers, marine clerks, mechanics and foremen who load, unload, track, monitor and oversee the movement of cargo, as well maintain and repair all stevedore cargo handling equipment, at all the ports in California, Oregon, Washington, Alaska and Hawaii.

We have long supported both improving the efficiency of California’s freight system and addressing the longstanding air quality issues that have affected the communities in which our families live and work. However, we strongly believe that improvements in economic efficiency and environmental compliance at our ports can and must be accomplished without harming the economic security of the hard working men and women we represent.

We have serious concerns that Sustainable Freight Action Plan’s recommendation that our ports transition to the use of zero and near zero-emission vehicles and equipment will have unintended negative impacts on our members.

We are concerned that the recommendation of the Action Plan to transition to the use of zero and near zero emission equipment will be used as a pretext to replace current equipment operated by our members with fully automated equipment that has no human operator. We believe legislation proposing taxpayer subsidies to implement the action plan will put 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 our members in California. For example, at both the Long Beach Container Terminal in Long Beach and the TraPac Container Terminal in Los Angeles, trucks and cranes which were once operated by longshore workers who received health care, pension benefits and middle class wages are now operated by fully automated driverless machines. The estimated loss of workers at these two terminals alone will be devastating, since up to three shifts can be scheduled per day. It is possible that at these two terminals the reduction in jobs could be in the thousands due to the introduction of fully automated equipment.

We hope both the executive and legislative branches of government, in considering specific funding priorities and programs related to California's goods movement system, give due consideration to the negative impact the transition to fully-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 our union supports efforts clean air efforts in our community, environmental progress should not be achieved by reducing the standard of living of the very same members of the community those gains are meant to benefit.

We do not oppose the transition to zero and near zero-emission vehicles and equipment provided they do not displace workers.

In addition, we feel that it is critical that the Sustainable Freight Action plan fully address the persistent problems caused by idling trucks waiting in long lines at our ports to receive freight. This problem of idling trucks is the single largest source of both freight inefficiency and air emissions affecting our ports. Any gains to be made from transitioning to zero or near-zero emission freight handling equipment on the dock will be lost if we fail to address the much larger problem of long lines of idling trucks belching diesel emissions while waiting to receive shipping containers. If California ports are to achieve the twin goals of reducing air emissions and increasing freight efficiency, there must be a real commitment to extending the hours of port operations and sufficiently staffing those operations with longshore labor so that truck turn times can be significantly reduced. This will also require that shippers play their part by extending the hours of operation of their warehouses to accept delivery of freight leaving our ports at night when highway congestion is at its lowest.

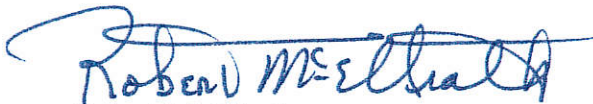
Finally, as with any infrastructure investment, we strongly believe that any policy encouraging the purchased of new equipment mandate that that equipment be made in the United States of America and, if possible, in California. There is no reason that our ports, which are agencies of government, should participate in the offshoring of manufacturing jobs and that state policy makers should ignore it.

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Thank you for your consideration.

Sincerely,

THE COAST COMMITTEE



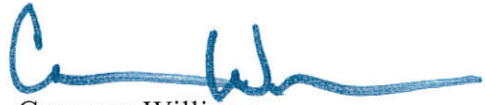
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