August 20, 2009

Bill Bryant  
President  
Port of Seattle Board of Harbor Commissioners  
PO Box 68727  
Seattle, WA 98168

Dear Commission President Bryant:

On behalf of the Waterfront Coalition, I would like to express our support for the Clean Truck Plan included in the Northwest Ports Clean Air Strategy. It is our view that this program will improve harbor truck related emissions without imposing additional supply chain costs on the Port’s many customers. Other ports around the country are supporting certain policies attached to similar clean truck programs that are designed to dramatically restructure the harbor drayage market without any benefit to clean air. We support the Port of Seattle’s program in its current form and urge the Commission not to endorse policies designed to restructure the drayage market in the name of clean air.

By way of background, the Waterfront Coalition represents manufacturers, product suppliers, retailers and agricultural producers as well as transportation providers moving international commerce through marine terminals and along the nation’s surface transportation system. Our members move a significant amount of cargo through the Port of Seattle and our members’ supply chains rely on the region’s harbor drayage industry. We have a direct interest in insuring that the port trucking industry operates safely, efficiently and in an environmentally responsible manner.

We support the Clean Truck Plan included in the Northwest Ports Clean Air Strategy designed to reduce harbor truck emissions. The rolling ban on the age of the truck will significantly contribute to harbor truck emissions reductions. A similar program that has been implemented in marine terminals in Southern California has already replaced over 30% of the trucking fleet in favor of equipment that meets or exceeds 2007 U.S. EPA emissions requirements. Industry experts expect 50% of the fleet to be converted by the end of the year. The success of this program will greatly contribute to air quality improvements.

We oppose efforts to amend existing federal law to give port authorities and other localities an exemption from longstanding federal truck rules codified in the Federal Aviation Administration Act (F4A). Already, the ports of Los Angeles, Oakland and the Port Authority of New York-New Jersey (PANYNJ) support this rule change so as to
unnecessarily regulate certain aspects of port trucking. This attempt to rewrite longstanding federal trucking laws is ultimately designed to fundamentally restructure the drayage industry so as to drive out of business the many hard working independent truckers moving international freight in favor of employee drivers.

Current federal laws already allow port authorities to move forward with clean truck programs such as those included in the Northwest Ports Clean Air Strategy. Already the ports of Los Angeles and Long Beach already maintain the legal authority under federal law to ban and replace aging dirty trucks. Other federal laws regarding port security and motor carrier safety are in place to address these issues.

The effort to amend existing federal trucking laws will do nothing to achieve clean air goals while fundamentally and unfairly restructuring the drayage market and increasing costs and supply chain headaches for the Port of Seattle’s many customers. Support for the amendment could send the wrong message to many cargo owners looking for alternative North American gateways.

We stand ready to work with you to implement a Clean Truck Program that truly supports clean air goals and urge not to endorse a change in federal law that will ultimately harm the many truckers that serve Pacific Northwest marine terminals and the competitive position that your port enjoy today.

Sincerely,

Robin Lanier
Executive Director