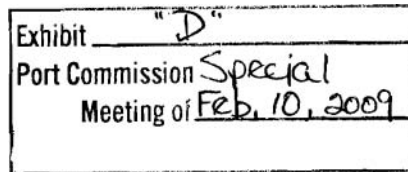


Port of Seattle Commission Special Meeting
February 10th, 2009
Comments for Submission to the Record

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On behalf of the Retail Industry Leaders Association, I would like to express our support for your outline for a clean truck program that ensures a reduction in truck emissions while maintaining a healthy business climate for supply chain investments in the ports of Seattle and Tacoma.

By way of background, the Retail Industry Leaders Association (RILA) is a national trade association of the largest and fastest growing companies in the retail industry. Its member companies include more than 200 retailers, product manufacturers, and service suppliers, which together account for more than \$1.4 trillion in annual sales. RILA members operate more than 100,000 stores, manufacturing facilities and distribution centers, have facilities in all 50 states, and provide millions of jobs domestically and worldwide.

Many of our member companies are also affiliated with the Coalition for Responsible Transportation (CRT), which is committed to being a responsible steward of the environment by facilitating the implementation of practical and sustainable solutions that reduce port truck pollution at our nation's blue water ports without disrupting the flow of commerce.

The Coalition for Responsible Transportation was formed in 2007 as a cooperative effort to work with industry stakeholders to begin to provide an intelligent, industry led response toward improving air quality in and around our nation's ports. Working together we can and will build an environmentally sound marine transportation system for the 21st Century

Shippers, like RILA's retail members, support the adoption of a rolling ban on trucks based on the model year of the equipment without fees imposed on industry stakeholders. The timeline included in your outline allows transportation providers to make sound investments that maintain both the Seattle and the Tacoma port's competitive advantage over other west coast ports.

RILA's members, who are among the largest shippers through the Port of Seattle, urge you to continue to not include fees on industry stakeholders to fund truck replacement programs. The ports of Los Angeles and Long Beach will soon implement a \$70/FEU fee to help fund clean trucks. In our view, this has in part led to the movement of some discretionary cargo out of LA/LB and into other "fee free" ports such as Tacoma and Seattle.

Mandatory fees may void investments shippers, carriers and drayage providers have already made to purchase fleets of expensive clean burning harbor trucks. We hope you will chose to rely on industry to identify the most cost effective investments available to comply with the standards you set.

We urge you not to include unnecessary provisions unrelated to the commission's goals and that would result in added costs to doing business through Seattle and Tacoma marine terminals. . Already, the Intermodal Carrier Conference of the American Trucking Association has filed suit against both the ports of L.A. and Long Beach for including a truck concession requirement in their Clean Truck Program designed to restructure the size and nature of the harbor drayage industry. These provisions force hard working small business owners out of the market while doing nothing to directly reduce truck emissions

Taking an industry friendly approach is good for business in Seattle/Tacoma. The more SeaTac's is able to differentiate itself from the ports of Southern California by working together with willing industry partners, the more it will position itself as a preferential gateway---which benefits everyone tied to the port economy including the truckers and drivers we have heard from today.

Many independent owner operators, such as those here today, make a good living and run successful small businesses, the backbone of the American economy. Independent operators can, will, and have deployed clean equipment without needing the port to get into the truck financing business or to impose any fees or employee mandates. Many of RILA's members have negotiated rates at the ports of LA and Long Beach with their individual trucking providers that allow for the purchase of new, clean equipment that is totally privately funded.

In these tough economic times it is extremely important to approach worthy environmental mitigation issues such as this one with careful consideration for unintended consequences. We must work together to avoid the problems encountered by some of your southern neighbors. Working in collaboration, we can ensure that we address the shared goal of reducing carbon emissions around the ports while protecting the businesses and good jobs affiliated with the port's operations.

I would like to thank you for allowing me to share the Retail Industry Leaders Association's views concerning a way forward to reduce truck emissions. Once again, RILA supports your concept of implementing a rolling ban based on the age of the truck applicable to both Seattle and Tacoma marine terminals. We are confident that industry stakeholders will find the most efficient means of complying with the rule so as to maintain the region's competitive advantage,