

*Driver Misclassification and Clean Truck Programs:
An In-depth Analysis of Two Southern California Ports*

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ABSTRACT

This report analyzes the misclassification of port truck drivers in the Ports of Los Angeles and Long Beach and examines the impacts that the Clean Truck Program has had. The goal is to recommend ways that future iterations of the program can address the driver misclassification issue. The research question is explored through a mixed methods approach of interviews and document analysis. Through analysis of public comments, interviews with drivers, and a close look at concession agreements required for port operation, this research finds an overwhelming concern with the continued exploitation of drivers and the costs associated with updating the Clean Truck Program. The research reveals that as it currently stands, the program has severely worsened conditions for drivers, but it is possible for the program to stop further exploitation. Through updated policy and increased enforcement, the Clean Truck Program in the Los Angeles/Long Beach Harbor Complex can improve the treatment of drivers and incentivize companies to turn towards an employee-driver model.

INTRODUCTION

As a result of a consumer economy and globalization, the shipping and logistics industry has grown drastically in the last thirty years. This growth has made life easier and more convenient for consumers but has come at a toll to the individuals responsible for getting goods on the shelf. Port truck drivers experience rampant worker misclassification and increased financial burden in comparison with employee and long-haul drivers. Port drivers are overwhelmingly classified as independent contractors when in actuality they are highly dependent on the companies they work for. The burden of the misclassified driver has become worse in recent years as ports across the country aim to reduce pollution and emissions with Clean Truck Programs (CTP). Programs requiring new, greener trucks increase the plight of already struggling drivers now faced with compliance fees or the cost of a new vehicle. Shipping and logistics firms are responsible for the truck traffic inside port complexes and should be held accountable for emission reductions and associated CTP costs. Instead, they continue to mistreat workers and avoid additional costs by classifying drivers as independent contractors and independent owner-operators.

The negative impacts that CTP has had on misclassified drivers have intensified labor issues within the port. As misclassified independent contractors, drivers are diminished and pushed to the side, treated as second-class citizens who are unable to unionize or bargain for better treatment. Companies have made the drivers a dispensable part of the business and are not held accountable for their livelihood. The CTP requires expensive compliant equipment and companies are searching for ways to cut costs, and as a result, the burden has fallen on the

mistreated and misclassified workers. While the program aims to improve environmental standards, it sacrifices the treatment of workers in the process.

As the world shifts towards a new environmental consciousness and desire for reduced pollution, ports around the US are adopting Clean Air Action Plans and Clean Truck Programs. By examining the Port of Los Angeles (POLA) and Port of Long Beach (POLB) harbor complex, we can address how CTPs affect driver misclassification. It is possible for programs to improve conditions for drivers and require employee status, and it is possible to shift the industry to prefer an employee model without a mandate. As it currently stands, the Clean Truck Program in POLA/POLB has had detrimental effects on misclassified drivers, but there is an opportunity to alter the program to empower drivers. To investigate the role that CTP has on driver misclassification, this research addresses the following question: How can a Clean Truck Program address the misclassification of the driver? Through interviews and document analysis, this research finds increasing concern with the enforceability of proposed policy updates and the overall treatment of drivers in the ports.

BACKGROUND

History of Los Angeles Port

Currently situated as the largest port complex in the country, the ports of Los Angeles (POLA) and Long Beach (POLB) accept more than 40% of all goods entering the country (“The Port of Los Angeles | History,” 2017). In 2016, the ports received more than 15.6 million twenty-foot equivalent units (TEUs), making them the largest in the western hemisphere (Los Angeles County Economic Development Corporation, 2016). Originally separate from Los Angeles, San Pedro and Wilmington—where the ports are located—were annexed to the city in 1909. From that point forward, the ports have grown to be major economic powerhouses for the region largely in part due to the widening of the channel in 1912, and the opening of the Panama Canal in 1914 (“The Port of Los Angeles | History,” 2017). The POLA/POLB are strategically located to receive goods from Asia and send them throughout the country. Over the last 30 years, the port complex has rapidly expanded to accommodate more ships at berth and went from accepting 1 million TEUs in 1997 to over 15 million TEUs in 2017. Rapid growth has occurred due to improved trade relations globally as well as stimulation from consumeristic tendencies as a nation.

When container ships enter the ports, there need to be systems in place to move the goods from the ports to their destinations. While rail is an efficient way to move goods long distance, the rail yards located at the port are not extensive enough to accommodate the large capacity of POLA/POLB. As a result, shipping and logistics firms transport goods via trucks to railyards, warehouses, and stores. This short distance traveling of containers is referred to as the drayage industry. Drayage trucking is a fast-growing industry as ports across the country

accommodate more TEUs needing to travel to more final destinations. In POLA/POLB, there are an estimated 15,000 port truck drivers that enter the various terminals each day in order to transport goods across southern California (LAANE & Coalition for Clean and Safe Ports, 2007).

History of Trucking and Port Trucking in Los Angeles

In the 1970s, the efforts of a broad coalition of independent truckers, consumer advocacy groups, and deregulatory minded individuals in the Nixon through Carter administrations successfully deregulated the motor carrier industry culminating with the Motor Carrier Act of 1980, and California's A.B. 1232 in 1979 (LAANE & Coalition for Clean and Safe Ports, 2007). Industry deregulation removed barriers to entry, gave rate-setting bureaus considerable leverage to adjust rates, and exposed the trucking industry to the competitive pressures of an unregulated market economy. As a result, truckers and trucking firms across the nation have faced downward pressure on wages and rates, in a sense restoring the cutthroat competition the industry faced in the early 20th century prior to the initial regulation.

The new laws put big trucking companies at a severe disadvantage because new small firms could contract drivers at low operating costs. Although big firms had established fleets of trucks and drivers, they had higher labor costs than a small firm contracting drivers on a load by load basis. Contracted drivers own and maintain their own trucks and buy their own fuel. Under the deregulated system, trucking companies would pay contract drivers by the load and not offer fringe benefits, dramatically driving down employee costs (Viscelli, 2016). Subsequently, operating costs for the new crop of motor carriers around the harbor dropped, and the price to haul a load of cargo fell accordingly. By deregulating the industry, small firms were able to undercut established firms and the industry shifted towards an owner-operator model.

As the workforce shifted from company drivers to independent owner-operators, this seemingly minor shift in employment status meant that truckers would no longer receive labor law protection and could not unionize. Independent contractors are prohibited from joining unions, while employee drivers are often members of the International Brotherhood of Teamsters. Independent contractors provide their own rigs, maintenance, fuel, insurance and other incidental costs like phone service and retirement (Smith, Marvy, & Zerolnick, 2014). Even though their gross income is comparatively higher than a company driver, after expenses and deductions, independent driver's net income floats around minimum wage rates. Firms, rather than truckers, take advantage of equipment depreciation in the tax code and sizable grants made available through the ports. This occurs regardless of employee status within companies, so a company with contracted drivers takes as many cuts as a company with all employee drivers. As such, independent owner-operators tend to lease compliant rigs from drayage firms rather than purchase their own outright.

Dirty Trucks and the Necessity of CTP

Seeing this problem, community groups, businesses, and nonprofits like Los Angeles Alliance for a New Economy (LAANE) sought to develop a solution. In 2006, the Southern California arm of the Coalition for Clean and Safe Ports - a national alliance of port truck drivers and over 100 environmental, labor, faith-based, community, transportation and public-health organizations working to promote sustainable trade at U.S. Seaports was created (Coalition for Clean and Safe Ports, n.d.). The coalition fought to implement the first Clean Air Action Plan (CAAP) and Clean Truck Program (CTP) and in 2006 the policy passed in both ports. The CTP addressed issues including phasing out dirty, old trucks and replacing them with cleaner,

efficient models, and banned drayage firms from using owner-operators. This employee mandate was taken to the 9th Circuit Court of Appeals against the American Trucking Association and was effectively blocked after a journey to the US Supreme Court.

To better understand the environmental and worker's rights issues facing the ports of Los Angeles and Long Beach, Los Angeles Alliance for New Economy (LAANE) conducted an in-depth analysis of the Clean Trucks Program and found it to be a policy solution that would combat many of the issues associated with the drayage industry (LAANE & Coalition for Clean and Safe Ports, 2007). They found that implementation would have considerable environmental benefits as well as benefits for truckers and the Los Angeles economy as a whole.

A variety of serious issues exist within the drayage industry, not limited to massive amounts of diesel pollution and rampant misclassification of drivers. According to the 2010 Big Rig report, "the EPA estimates that some 87 million Americans now live and work in port regions that violate federal air quality standards" (Smith, Bensman, & Marvy, 2010, p. 11). The ports are responsible for various points of pollution emission, and trucks are the primary pollutant. Harmful pollutants include diesel particulate matter (DPM), nitrogen oxides (NOx), and sulfur oxides (SOx). These pollutants are toxic to our air quality, but DPM exposure causes health problems like cancer and premature death. The California Air Resources Board cites diesel related pollution as one of the top causes of death in the state. Polluting trucks are responsible for 62.5% of the industry's health impacts (Smith et al., 2010). These dirty trucks travel through urban areas with concentrated populations leaving a trail of toxic air in their wake. While communities suffer from unnecessary pollution from outdated trucks, truck drivers are exposed to these chemicals and pollutants on a daily basis.

Employment misclassification prevents environmental improvements by requiring drivers to purchase and maintain their own trucks. Since drivers receive an inadequate wage they often purchase older trucks which typically are cheaper and emit larger amounts of diesel pollution. LAANE found that 88% of the over 15,000 port truck drivers based in the LA/LB port complex are classified as independent contractors, with employees accounting for only 12% of the port trucking workforce (LAANE & Coalition for Clean and Safe Ports, 2007). After deductions and accounting for maintenance and incidental costs, independent contractor drivers make \$10-11 an hour, which averages around \$29,000 per year (LAANE & Coalition for Clean and Safe Ports, 2007). Compared to employee drivers who earn around \$40,774 a year, owner-operators face a 40.6% wage differential. Additionally, owner-operators are 1099's and shoulder a higher tax burden as employers do not pay their portion of income tax. As a result, on top of the pay difference, employees save an additional \$979 in taxes each year. In addition to low wages, the majority of these drivers lack health care and must rely on public, taxpayer-financed care. LAANE found that only 10% of drivers have health insurance and only 5% have pension benefits (LAANE & Coalition for Clean and Safe Ports, 2007).

Table 1. ANNUAL SUBSIDIES FOR DRIVERS BY EMPLOYMENT STATUS^a		
<i>Employment Status</i>	Annual Benefits	
	<i>Independent Contractor</i>	<i>Employee</i>
Adjusted Gross Income	\$29,000	\$40,744
Earned Income Tax Credit	\$1,964	\$0
Section 8 Housing	\$ 15,288	\$0
Reduced-Price School Meals	\$542	\$0
WIC	\$439	\$0
Total Anti-Poverty Subsidies	\$18,173	\$0

^a(LAANE & Coalition for Clean and Safe Ports, 2007, p. 13)

Benefits of CTP

LAANE found that, overall, with \$174 million in wage increases as well as the additional \$14.5 million dollars that will be saved by shifting the tax burden from drivers to employers, the total amount of money injected into low-income communities in Los Angeles will be \$360,887,337 (LAANE & Coalition for Clean and Safe Ports, 2007). Currently, the average independent contractor driver qualifies for over \$18,000 of welfare benefits each year, which puts an undue burden on taxpayers for basic necessities like food and healthcare. With owner-operator drivers depending on welfare benefits, an estimated \$67 million is spent on medical care for drayage drivers and their families (Smith et al., 2010). The CTP also has a variety of health benefits, LAANE found that the decrease in pollution as a result of the program would lead to 87.6 fewer premature deaths, 103 fewer hospital admissions and 2,449 fewer cases of asthma, and other respiratory symptoms each year as well as 13,140 fewer lost workdays and 40,150 fewer school absence days per year (LAANE & Coalition for Clean and Safe Ports, 2007). A successful CTP would result in reduced driver turnover and increase overall port efficiency. The plan's environmental impacts are far-reaching as well. The Clean Trucks Program combines "a progressive ban on older trucks with generous subsidies to businesses that purchased new, cleaner trucks" in an attempt to reduce diesel truck emissions by 80% over 5 years (Boston Consulting Group, 2008). By shifting the burden of truck-maintenance from struggling employees to companies, the program ensures that these new trucks have a better chance of being well-maintained and staying clean.

Clean Truck programs address environmental and workers' rights issues and improve the quality of drayage service and community outcomes. While the Los Angeles port complex

was the first port in the US to adopt a clean trucks program, many ports have adopted similar programs in recent years in an attempt to combat pollution and maximize efficiency within ports.

LITERATURE REVIEW

Introduction

Very little literature exists on how Clean Truck Programs (CTP) affect driver misclassification. However, research on Clean Truck Programs and driver misclassification issues exist separately. In order to understand how deeply these issues are connected with one another, we must examine the drayage and logistic industry as it relates to Clean Truck Programs. Studies have been conducted on the precarity of port trucking jobs (D. Bensman, 2008, 2009, 2014; D. H. Bensman, 2017; Jaffee & Bensman, 2016; Jaffee & Rowley, 2009). Additional research has been performed on the economics of the drayage industry in the Port of Los Angeles (POLA) and Port of Long Beach (POLB) prior to the passage of CTP with a follow up study two years after passage (Monaco, 2010; Monaco & Grobar, 2004). Anne Goodchild and Karthik Mohan conducted an initial evaluation of the policy implications of the POLA/POLB Clean Trucks Program, however, this evaluation does not account for more recent policy updates (Boston Consulting Group, 2008; Goodchild & Mohan, 2008). As mentioned, research exists on the expected outcomes that a Clean Trucks Program will have on the environment and economy, but little if any research has connected CTPs with driver misclassification issues. The literature surrounding the issues is quite small but it is deeply focused—meaning that a handful of authors have conducted multiple studies on the topic. The purpose of this literature review is

to concretely define the drayage industry, misclassification, and clean truck programs.

Additionally, I will identify gaps in existing literature around which my research question has been framed. Finding the intersection between driver misclassification and clean truck programs is compulsory in understanding how port complexes can improve operations and the lives of drivers.

Defining the Drayage Industry

Separate from long-haul trucking, port truck drivers are classified as drayage drivers, meaning that they are driving shorter distances and hauling intermodal containers (Belzer & Swan, 2011). Since the advent of incredibly large container ships carrying upwards of 10,000 twenty-foot-equivalent units (TEUs), intermodal shipping and rail facilities have become much more prominent. The Port of LA has grown massively since the 1980s, now receiving more than 15 times the capacity than it did in 1980 (Ng & Frey, 2013; “The Port of Los Angeles | Maritime,” n.d.). The drayage industry operates as result of commodity supply chains that a consumerist America has demanded. Port trucking is necessary in order to get goods off of ships and into local warehouses and rail yards where goods are shipped further. Existing literature is in agreement with the defining characteristics of drayage. Intermodal companies specialize in drayage operations in order to facilitate port operations. Across the globe, drayage/logistics companies compete for contracts with shippers. Companies then contract drivers to haul containers on chassis trailers from the port to a yard or warehouse and then back again (Bisom-Rapp & Coiquaud, 2017). Essentially, the drayage industry relies on contracts between shippers, logistics companies, and drivers, and any kinks in the chain would cause chaos in the ports. Since logistics companies compete with one another for jobs, they are able

to profit from contracting drivers and paying lower rates than an employee would receive. Competing with other firms lowers costs for shippers and retail companies, but it makes matters worse for drivers who inevitably get the short end of the deal. When companies are unwilling to sacrifice profits, the lower costs roll down the supply chain and the drivers are faced with the burden and receive lower wages. With a clearer understanding of how the drayage industry works, we can delve deeper into the issues that drivers face.

Misclassification and Precarious Work

As mentioned in the definition of the drayage industry, many drivers in the ports are hired as independent contractors instead of employees. As contractors, drivers are in the line of contingent work and the jobs are considered precarious, meaning that there is little to no job security. The US General Accounting Office found in 2005, that around one-third of the US workforce was contingent and independent contractors make up the majority of contingent workers across the country (D. H. Bensman, 2017). David Bensman has published numerous works detailing the impacts that independent contracting has on individuals with a special focus on the port trucking industry. All of his works focus on the hazy definitions that government has for employees. In fact, the Fair Labor Standards Act of 1938 defines employee but offers no definition of independent contractor (D. Bensman, 2014). In order to determine independent contracting, states look at employers to see how a contracting company meets three criteria: *behavioral control, financial control, and relationship type*. If a company demonstrates control over how a worker acts, how they are paid/how much they are paid, and the exclusivity of the relationship, then the individual is more than likely an employee, not an independent contractor (D. Bensman, 2008, 2009). As a result of the nonexistent definition of independent

contractor, a gray zone exists in employee classification. It is tough to prove that a company is misclassifying its workers as independent contractors without going through legal proceedings. In his various analyses of driver misclassifications, Bensman discusses the negative impacts that the issue has on government revenues as well as drivers. By misclassifying drivers, companies are placed in lower tax brackets since they have fewer employees. The general consensus within the literature is that misclassification is bad for drivers, the government, and basically everyone except for the companies misclassifying drivers. Companies benefit from misclassification through tax breaks, while the drivers suffer from low wages and the government loses out on taxes and has to dole out more welfare payments. The misclassification issue soared to prominence in the mid-1980s after the passage of the Motor Carriers Act in 1980 (D. Bensman, 2008). This federal act called for deregulation of the industry and allowed companies to hire independent contractors. With a clearer understanding of employee classification presented by Bensman, it is crucial to link the issue with port complexes and the decisions that they make to allow this to happen. The Motor Carriers Act has exacerbated the misclassification issue by incentivizing companies to turn towards an independent contractor model. This industry standard could be changed through policy updates mandated through the ports.

In 2004, Kristen Monaco and Lisa Grobar released a study of drayage operations in POLA/POLB (Monaco & Grobar, 2004). The extensive economic analysis interviewed drivers to find out more about the conditions under which they work (Monaco & Grobar, 2004). Like Bensman, the authors discuss the nature of port trucking and find that the overwhelming majority of drivers are independently contracted owner-operators, with only 13.1% of

respondents claiming employee status. The survey instrument they used sought to discover how drivers receive their work from companies and how they are paid. Prior literature mentions that drivers are paid on a per load basis, and this study confirms that. Additionally, the authors found out that drivers were unable to negotiate which load they took and how much they were paid for the loads. The authors create economic models for wages and wait times and found that employee drivers are paid more and wait less than contracted drivers, a finding that complements other literature on the topic regarding the treatment of employee drivers (Monaco & Grobar, 2004). This study is most relevant to this research because it specifically analyzes working conditions in POLA/POLB.

Monaco conducted a follow-up survey that was published in 2010 and added additional questions to the survey that pertained to the recently adopted CTP (Monaco, 2010). In this follow-up, the author found that net earnings for owner-operators had fallen while employee earnings had risen slightly. The decline in owner-operator earnings can be attributed to increases in expenses that they faced from the early phases of CAAP and CTP. Monaco and Grobar's analyses of the wages and conditions of port drivers are significant to the proposed question since it clearly discusses driver classification issues. While the authors have updated their initial analysis, which took place long before the CTP was passed, the updated survey took place just after CTP passed and before many drivers had to update their trucks. As a result, their analysis does not encapsulate the effects of the CTP on drivers. It is important to note that while this study does not analyze the direct effects of CTP, it highlights the trends of the port over time. Conditions have worsened further as CTP has gone into effect and no policy changes have altered the status of driver classification (Monaco, 2010).

Current State of Employee Misclassification

In a 2011 publication, Robert Franklin et al. explain the complexity of the misclassification issue and the reasons why class action lawsuits are bound to happen in determining employee classification (Franklin, Kota, & Milane, 2011). The authors go into detail about the lawsuit between the POLA and the American Trucking Association (ATA) that made it to the Supreme Court. In this case, the ATA argued against the employee mandate and for the continuation of the independent contractor model. ATA cited that the Federal Aviation Administration Authorization Act ("FAAA") preempted the concession agreements required for operation within the ports. FAAA prohibits any state from enacting regulation relating to price, route, or service of motor carriers so it was argued that the concession agreements were attempting to regulate motor carrier operations (Oyez, n.d.). Initially, the Ninth Circuit Court of Appeals sided with the ports stating that their interest was as a market participant, not a regulator. The Supreme Court found that the ports were acting with regulatory power and sided with the ATA which resulted in the removal of the employee mandate from CTP, and the case brought attention to the drayage industry and misclassification issues.

The ATA, who represents trucking companies, was looking out for the drayage companies best interest to make more revenue. However, since the court cited the commerce clause, they should have sided with the POLA since the employee model would bring in more revenue in the form of taxes and benefits. Since the Supreme Court case, there has been an uptick in class actions for misclassification and it has to do with the weak definitions surrounding employee classification (Franklin et al., 2011). Similar to Bensman's works, the authors discuss the gray area in worker classification and as a result more suits are being

brought to the courts. An unclear boundary between the contracted drivers and their dependency on companies brings to light larger issues with port policy regarding worker status. To conclude their discussion, the authors describe necessary conditions that drayage companies should meet in order to properly classify drivers as true independent contractors. While this discussion is relevant in establishing guidelines for companies, it also appears like a how-to guide for drayage companies to get away with misclassification. This study illuminates legal issues surrounding misclassification and why it persists in the US and specifically explains how POLA has been able to continue with the independent contractor model.

With the majority of literature focusing on the POLA/POLB CTP, David Jaffee and Adam Rowley conducted a study on Jaxport in Jacksonville, Florida (Jaffee & Rowley, 2009). The study they designed emulated the work of Monaco and Grobar but focused on a much smaller port complex. Similar to Monaco and Grobar, Jaffee and Rowley found that the majority of drivers were independent contractors and belonged to minority racial groups. The overwhelming consensus in drayage driving is that independent contractors are truly dependent contractors, with little freedom that is often associated with independent contracting jobs. Drivers are dependent upon the single company that they contract with, unable to drive for other companies, negotiate pay rates, or decide when they work. If brought to court, these drivers would not meet the standards established by the Fair Labor Standards Act. Independently contracted drivers are independent in name only. The study is quite narrow and focuses solely on driver demographic data and the proposed effects it has on drayage operations. It does not consider specific port operations like the Monaco and Grobar studies. Port complexes have the ability to change driver conditions through specific policy changes that mandate employee

status. More recently, in 2016, Jaffee expanded on his work in the logistics industry and found that kinks in the supply chain are caused by the misclassification of drivers. Essentially, he concludes that stricter regulations need to be enforced in properly classifying drivers in order to increase drayage efficiency (Jaffee, 2016; Jaffee & Bensman, 2016). While these more extensive papers take multiple port structures into consideration, they do not include CTPs in the analysis of misclassification issues. By mentioning stricter regulations, Jaffee hints at policy stimulating change.

Clean Truck Programs

The POLA/POLB passed CTP as a piece of the 2006 Clean Air Action Plan. While the larger plan called for emission reductions and environmental improvements across the port complex, CTP focused specifically on the trucks that are allowed into the ports. Goodchild and Mohan established a clear analysis of the POLA/POLB Clean Trucks program. The original CTP required trucks entering the ports to meet 2007 EPA Standards, banned pre-1995 model engines, and required updates for 1996 and newer engines. In addition to the new emission standards, the CTP plans to reduce terminal traffic through the implementation of a PierPass system which monitors port entry (Husing, 2007). At its core, the CTP was designed to reduce emissions and help the port complex function more efficiently.

Shortly after the passage of CAAP and the adoption of CTP, Anne Goodchild and Karthik Mohan published an evaluation of policy impacts on maritime operations in the POLA/POLB (Goodchild & Mohan, 2008). Their 2008 analysis looks at the three necessary conditions that logistics companies are required to meet in order to be eligible to operate within the port complex: employee mandates, concession agreements, and truck impact fees. In an early

evaluation of the program, the authors examine the employee mandate that the POLA proposed. It is important to note that the employee driver mandate was only required for LA terminals and not LB terminals. Goodchild and Mohan assess that while some suggest that employee drivers will lose productivity, the likely outcome is that drivers will stay in the industry longer and companies will incentivize productivity. Additional evidence suggests that employee drivers face shorter wait times since companies are forced to maximize efficiency in trip planning. Furthermore, the authors predict that an employee mandate will cut down on wait times in terminals even with increased terminal security. The improvements to drayage technology will increase terminal communication, safety measures, and decrease wait times. Had this mandate gone through, it would have greatly improved working conditions for port drivers. In addition to improving environmental outcomes, the CTP would have directly stopped the misclassification issue by requiring all drayage companies to operate with employee drivers.

The next portion of Goodchild and Mohan's analysis focuses on the concession agreements that trucking companies must obtain to operate in the port. This portion of the CTP would cause significant changes to the market structure of the port by limiting the companies that can enter terminals. Similar to a cap and trade system, logistics companies would obtain concessions in order to operate within the ports, and larger companies could obtain larger agreements while smaller companies could offer portions to larger firms. The authors assess that existing companies would obtain concessions to operate and increase their fleet size. Concessions are a way for the ports to regulate the industry and limit the number of firms allowed to operate. As a result, the fleet sizes will increase to maximize efficiency and additionally, companies will turn to an employee model without the mandate. Under a

concession agreement, companies will own equipment instead of contracting to owner-operators because companies will be held responsible for complying with regulations. Concession agreements will increase efficiency outside terminals and improve conditions for drivers as well since firms are likely to turn towards an employee model. A concession model shows another way in which a CTP can impact the misclassification issue since firms would alter operating strategy on their own.

To conclude their analysis of the program, Goodchild and Mohan assess the truck impact fee that noncompliant trucks will pay in order to enter the ports. Under the CTP, trucks must meet 2007 EPA standards or a \$35 entry fee will be assessed. As a result, companies and owner-operators will be required to either buy new trucks or upgrade engines in order to meet these standards. This fee is expected to reduce truck traffic by increasing load size so that drivers have to enter the ports fewer times and therefore pay fewer fees. They discuss the impacts that noncompliance will have and conclude that the fee alone is not enough to change terminal operation. While the environmental impacts of this policy are beneficial, they do not affect the efficiency of port operations. A compliance fee places a huge burden on the independent contractor driver because they will be the one to pay each time they enter the port, or be forced to purchase a complying vehicle.

The Goodchild and Mohan analysis is now outdated since several CTP updates have occurred since 2008. Most significantly, the employee mandate has been revoked by the Supreme Court, and as a result, their review is no longer significant. The authors effectively explain the benefits of CTP and the expected outcomes that the policy will have, however, they do not recognize the negative impacts that it has on owner-operators.

In addition to Goodchild and Mohan's policy analysis of CTP, Christopher Clott and Bruce Hartman reviewed the port policy and used a game theoretical model to better analyze the effects of the program (Clott & Hartman, 2013; Hartman & Clott, 2012). Since Clott and Hartman published this in 2013, they were aware of the changes in the policy that resulted from court cases, meaning that their analysis was not completed under the impression that logistics companies face an employee mandate. They identify the POLA/POLB case as significant since it was the first CTP policy of its kind and other North American ports followed suit. The model that Clott and Hartman produce supports the initial CTP in its decision to upgrade trucks to meet pollution standards. The authors provide a detailed background of the program and associated costs before they discuss their model which explains why both small and large logistics companies are drawn to the independent contractor model. Deeper into the model they explain how firms should choose to update trucks in compliance with CTP and they find that the equilibrium percentage of trucks that should be upgraded is the same for owner-operators and drayage firms.

While their model is empirically sound, it doesn't take into consideration the added cost that an upgraded truck has for an owner operator. Their model works as a policy suggestion for POLA/POLB but it does not address the underlying issues of misclassification. As Bensman and Monaco suggest, these supposed owner-operators are dependent contractors, so drayage firms should be required to foot the cost of upgraded trucks. The weakness in Clott and Hartman's theoretical model is that they have designed it for the Port's consideration and not the drivers.

Gaps in the Literature

From the published literature, clear definitions of drayage, misclassification, and Clean Truck Programs exist. However, there is no research that demonstrates how Clean Truck Programs address driver misclassification and associated issues. The initial CAAP and CTP called for an employee mandate for port drivers, however, the Supreme Court has ruled against that portion of the program citing the commerce clause (Clott & Hartman, 2013; Norsworthy & Craft, 2013). CAAP and CTP have undergone several rounds of updates and little new research has been conducted. Several port complexes across North America including Oakland, New York/New Jersey and Houston, have adopted similar Clean Truck Programs and I am interested to learn if and how these programs address the misclassification issue. My research aims to identify the intersection between CTPs and driver misclassification.

METHODS

The aim of this study is to better understand the role that Clean Truck Programs play with driver misclassification and in part determine how the programs have helped or hindered drivers in the ports. In order to determine the direct effects that the Los Angeles/Long Beach Clean Truck Program has had on drivers and misclassification, I conducted interviews and document analysis. A mixed methods approach was necessary to determine the measurable impacts as well as perceived impacts of the CAAP and CTP update.

1. Public Comments

I collected public comments from the year-long comment period leading up to the November 2017 CAAP Update vote. Comments were requested through a California Public

Records Act request to the Port of Los Angeles Harbor Commission Office. The request stated, “All CAAP comment letters from November 2016 to November 2, 2017 (written & emailed).”

The request was received and documents were forwarded to me that can now be found on the CAAP website (“About the Plan,” n.d.). Comments were analyzed to see if themes and concerns brought up were similar across stakeholder type and to identify if the themes in interviews were the same. Comments were separated into categories based off the stakeholder that submitted the comment. Categories include agencies & academic institutions, industry, environmental, and community stakeholders. Of the 552 comments that were received, I analyzed comments from each category to ensure that a representative 10% of all comments were reviewed. I skimmed through all of the comments and focused more heavily on the comments that brought up themes of misclassification and driver experience. Additionally, I noted other themes that the interviewees raised.

2. Interviews

Interviews were conducted with field experts and drivers. By compiling a list of academics, professionals, and people involved with the POLA/POLB Clean Trucks Program, I was able to contact individuals via email and phone to set up interviews. These conversations lasted between 40 and 75 minutes. I conducted three interviews over the phone. The conversations were recorded for note-taking purposes with the subjects’ informed consent. I interviewed two distinct groups for my research: drivers and industry professionals.

List of Interviewees

- **Nick Weiner**, campaign director of Justice for Port Truck Drivers
- **Daniel Aneseke Uaina**, driver for Intermodal Bridge Transport
- **Owen Harvey Vaea**, driver for Intermodal Bridge Transport

The non-driver that I interviewed held a wide array of opinions and approaches to the issue of misclassification and CTPs. By speaking with Nick Weiner, the director of the joint Change to Win and International Brotherhood of the Teamsters Justice for Port Truck Drivers Campaign, my research was better informed and more accurately represented the different sides of the topic. Weiner helped draft the original Clean Truck Program and now acts as an advocate for drivers surrounding the issue. He was asked a series of questions regarding his knowledge of the program and any changes that he would like to see. Through the course of the interview, I was able to identify ways in which he viewed the misclassification issue and how he believes it should be fixed. The answers to common questions helped illuminate similarities in opinion regarding the issue (full list of questions available in Appendix A). From the answers, I was able to inform my analysis and recommendations for future versions of the CTP.

In addition to the policy expert, I interviewed two truck drivers about their experiences with the CTP and misclassification. These drivers were recommended to me through Angelo Logan in the Moving Forward Network. The purpose of interviewing drivers was to obtain a narrative perspective on the issue that could not be portrayed through the completion of a survey. The questions asked of drivers varied from those asked of field experts (full list of questions available in Appendix A). Interviews with drivers focused on their personal experience and perceived impacts of the CTP. Similar to the experts, drivers were asked for recommendations to solve the misclassification issue. By speaking with two drivers, I was able to understand their personal experiences on a deeper level. Common themes were discussed during the interviews that highlighted the necessity of change to the Clean Truck Program.

3. Concession Agreement Analysis

Lastly, the previous 4 concession agreements from the Clean Truck Program were analyzed to identify how the language of the agreement has changed. These agreements were found on the Port of Los Angeles Clean Truck Program webpage along with other related CTP documents. Text analysis was performed on the concession agreements to see how the agreement has changed over time and what implications the language of the agreement has on drivers. The original agreement included an employee mandate that required all drivers be classified as employees by 2013. This provision was struck down by the US Supreme Court in July 2013, so the concession agreement was altered. By comparing the past and current agreements I was able to determine how the agreement could alter the way that drivers in the drayage industry are hired.

Limitations

As a result of contacting drivers through one another, I was only able to speak with drivers who work for the same company and began in the drayage industry at the same time. Therefore, the experiences that they shared were somewhat similar and not entirely representative of the nearly 15,000 drayage drivers that are currently working in the port. However, Weiner brought up similar issues which substantiated the driver perspective leading me to believe that their experiences are quite similar to other misclassified drivers. This research would be stronger if it included more interviews from a variety of drivers.

Due to time constraints, I was only able to analyze around ten percent of the public comments. While this did allow me to identify patterns in the comments and core themes that

were consistently brought up, the research would gain strength from a more detailed look at all of the comments that were submitted during the period.

FINDINGS AND ANALYSIS

After completing three exploratory interviews with drivers and a policy expert/advocate, reviewing public comments from the yearlong comment period, and analyzing the concession agreements for the ports it became abundantly clear that the Clean Air Action Plan and Clean Truck Program need to address misclassification of the driver. Since CAAP and CTP have worsened the crisis, it is necessary for future iterations of the programs to address the employment issue. All of my interviewees— two port truck drivers and one policy expert/driver advocate— emphasized the importance of clean air and cleaning up the ports but that it has come at an extreme cost to port truck drivers who have faced the brunt of the cost burdens associated with the program.

Both drivers and policy experts desire a Clean Truck Program that places the cost burden on the companies rather than drivers and they recognize that compliance with new regulations will be tough to enforce. Similarly, public comments address issues regarding the cost of updating the program and the uncertainty of who will pay for the changes. Stakeholders ranging from community members, environmental groups, academic institutions, drayage drivers, and trucking companies all weighed in during the comment period. Through the yearlong period, it became clear that there are serious concerns with the feasibility and

enforceability of updating CAAP and the CTP. Below are some common/key findings from my research.

Key Findings

- Drivers view drayage work as generally desirable work. With better pay and benefits it would be the most desirable form of trucking.
- A consensus that independent contractor drivers are treated as second-class citizens.
- Without an employee mandate, drivers do not see a solution to the problem.
- Enforcement and compliance will remain an issue with any proposed solution.
- Policy needs to be introduced to continue improving a green agenda without continued exploitation of drivers.
- Serious public concern regarding the costs associated with CAAP/CTP updates and the POLA/POLB emission reduction plan.

Public Comment Analysis

While the exploratory interviews allowed me to frame the issue around both the driver and advocate/expert perspective, the comments were used to decipher the perspective of other stakeholders in the issue. The public comments were analyzed to see if the areas of concern were analogous among stakeholders and interviewees. The interviews framed issue areas to look for in the comments including worker mistreatment, driver misclassification, and appreciation for emission reductions that CAAP/CTP have brought.

After submitting a public record request to the Harbor Commission, I received 3 documents containing 552 public comments from November 2016 to November 2017. These comments were submitted electronically through a comment portal or received in the mail. There were open comment periods held at two harbor commission meetings to discuss the CAAP update, but transcripts for those meetings have not been made available. With that in mind, I set out to examine the comments for mention of driver misclassification, clean truck programs and other aspects of the CAAP update that relate to the topic. Table 2 breaks down

the comments into categories based on stakeholder type, a full list of comments is available in Appendix B. These categories were created by the CAAP team who compiled the public comments for distribution. The original documents included five categories: Agencies & Academic Institutions, Industry, Community, Environmental, and Other. Upon reviewing the comments, the distinction between the community and other categories was not clear as both contain comments from community members as well as larger organizations. Because of this unclear distinction, I combined these categories. Findings from each stakeholder category can be found below.

Table 2. TOTAL COMMENT BREAKDOWN

		Comment Period			
		Nov 16-Jun 17	Jul 17- Aug 17	Sep 17- Nov 17	Total
Stakeholder Type	<i>Agencies & Academic Institution^a</i>	4	4	1	9
	<i>Industry^b</i>	19	62	8	89
	<i>Environmental^c</i>	6	10	3	19
	<i>Community^d</i>	17	349	69	435
	Total	46	425	81	552

^a Includes academic institutions and government agencies including Air Quality Management District and California Air Resources Board
^b Includes drayage companies, fuel companies, related unions, surrounding city agencies, and individuals working in the ports
^c Includes coalitions working to improve environmental conditions and environmental advocacy groups
^d Includes individuals in surrounding communities, community coalitions, city agencies not directly involved with the ports, and neighborhood councils

Agencies & Academic Institutions

Key Findings

- Expressed concern with the cost of the program and proposes funding solutions
- Recognition of worker exploitation
- Concern with environmental impacts

Academic institutions including UCLA, UC Riverside, and Mount San Antonio College submitted comments during the period. Comments from the institutions focused on the cost concerns of the plan and applauded the positive environmental impacts that the plan has had.

The UCLA Community Scholars class submitted a comment on February 20, 2017, critiquing the plan and focused their analysis on workers in the supply chain, communities adjacent to logistics sites, and the environmental impacts of transportation. They highlight the workplace exploitation that has resulted from the plan and suggest that:

Any update to the Clean Trucks Program needs to ensure that independent truck drivers are not unfairly burdened by any fees or requirements to purchase new trucks. Instead, the companies that unfairly classify truck drivers as independent owners and operators (IOOs) need to be held accountable for any raises in fees or requirements to purchase new trucks. The Ports should engage IOOs to develop an effective financial assistance program (CAAP, 2017b, p. 73).

Academic institutions recognize the exploitation that drivers face as a result of the rampant misclassification and mistreatment.

Only three agencies submitted comments and two of them—California Air Resources Board (CARB) and South Coast Air Quality Management District (SCAQMD)—were partners heavily involved in the draft process. As a result, these comments praise the plan and the environmental accomplishments that have been made. CARB did not mention drivers or drayage issues in their comment and instead talks about their “mutual commitment to this partnership” with the port. It is important to note that CARB is one of the regulatory agencies for CAAP and sets the clean truck and emission standards. As such, CARB seems more concerned with pleasing the ports and maintaining a pleasant relationship than being critical of the work that they are doing.

In SCAQMD’s September 18, 2017 comment they discuss the necessity for CAAP to update emission reduction goals to match levels that their assessment deems possible. Additionally, SCAQMD discussed the Clean Truck Program and how implementation needs reduce costs and increase equitable access to the clean technologies. They propose potential

strategy and funding mechanisms for CAAP to meet these goals as “alternative financing mechanisms, truck exchange programs with areas outside the air basin, [and] partnering with engine manufacturers to identify ways to reduce the costs of cleaner technologies” (CAAP, 2017a, p. 138). SCAQMD shows interest in the cost burden that drivers face and presents ideas to handle the issue. As an agency specifically focused with air quality, they are still able to recognize the multidimensional nature of the issue.

Industry Stakeholders

Key Findings

- Expressed concern with the cost of the program
- Recognition of worker exploitation, suggestion of employee based model
- Setting goals is not enough to meet the necessary emission reductions
- Issues with program compliance
- Concern with environmental impacts

The industry comments had the most input related to the Clean Truck Program and the themes that interviewees explored. Drayage Companies comprised 35.9% of the Industry comments and clean energy/fuel companies sent in 24.7% of the comments. Additionally, four unions involved with the logistics industry also submitted comments during the period. The remainder of the comments were from companies in the industry not specifically involved with trucking and from various chambers of commerce in surrounding cities.

The Pacific Merchant Shipping Association (PMSA) was heavily involved in the process submitting 8 comments throughout the period. PMSA is an organization focused on global trade and represents owners and operators in maritime terminals on the west coast. The organization raises questions about the costs associated with the update saying, “where will the funding come from and what will the ports do to ensure that they remain competitive with other trade gateways while imposing these costs on their customers and tenants?” (CAAP,

2017, p. 363). When discussing the green truck initiative in the update they say, “the ports need to provide incentive funding to marine terminal operators to provide the necessary benefits to truck owners. Any program proposed by the ports improve service to truck operators” (CAAP, 2017a, p. 377).

David Thornburg, a representative of Duncan and Son Lines suggests, “asset based companies—trucking company owns the trucks, [and] the employee model—employer hires drivers, do not employ owner operators” (CAAP, 2017a, p. 92). Duncan and Son Lines operates with employee drivers and relies only on independent contractors for peak times— but they do not restrict contracted drivers to only work for them.

Clean Energy Fuels—a company focused on natural gas transportation— and its employees sent in eight comments that expressed concern with the timeline for emission reductions. Warren Mitchell said, “we cannot make up for lost time when we don’t capitalize on a winning opportunity that solves significant and sometimes fatal health problems” (CAAP, 2017c, p. 93). Ron Thompson a two-time cancer survivor stated, “please consider instituting clean power trucks and yard equipment as soon as you can, if we can prevent 1 person every week, the fight of survival or the cost to our economy, it is worth the investment” (CAAP, 2017c, p. 94). The company itself commented, “despite the tremendous gains that have been made to date, more needs to be done to reduce harmful air emissions from ships, locomotives, on- and off-road heavy-duty trucks that operate at our ports” (CAAP, 2017b, p. 81). In a letter signed by Clean Energy and fuel solution companies they said, “the actual amount of funding required is modest compared to the benefits to our communities and the Ports’ ability to grow and employ Southern Californians” (CAAP, 2017b, p. 4). Clean Fuel companies are

understandably proponents of the CTP requirements to move towards near-zero emission trucks in the coming years, but they still recognize that setting these goals is not enough to ensure compliance and emission reductions.

The International Brotherhood of the Teamsters Port Division and Local 848 submitted a seven-page letter and a petition with 2,299 signatures to demand that “the trucking companies and their big retail customers pay for these new zero-emission trucks. And you must kick out any trucking company that breaks the law and makes us pay for their equipment” (CAAP, 2017a, p.231). The Teamsters Port Division has been responsible for organizing independently contracted drivers to unionize and fight misclassification. As such, their comments on the proposed update were highly valuable in regards to this research. They highlight issues of cost burden and compliance that interviewees touched on saying,

These costs include expensive lease payments and maintenance costs, which has gotten passed on to drivers after the trucking industry’s legal challenges weakened the original CTP policy. Second, the incredibly fragmented nature of the industry makes it imperative that the Port not simply enact, but vigorously enforce the CAAP (CAAP, 2017a, p.225).

The Teamsters mention poor workplace treatment and the exploitation of drivers stating:

Trucking companies – many of which received thousands in public subsidies to purchase new trucks – required drivers to sign predatory subleases under the guise of an “independent contractor” arrangement if they wanted to keep their jobs. Through this same system, trucking companies were also found to coerce drivers to drive far longer hours than is legally permitted, by holding the threat of retaliation, termination, and losing the equity paid into the trucks over the heads of drivers (CAAP, 2017a, p.226).

Environmental Stakeholders

Key Findings

- Ports are still high risk for surrounding communities and environment
- Expressed concern with the cost and funding of the program
- Plan is inequitable and does not support drivers or ensure fair treatment

The 19 comments from this category came from groups like the Sierra Club, Earthjustice, the Natural Resource Defense Council, and various coalitions centered on clean air. As expected for the comments from this category, they primarily focused on the environmental aspects of the CAAP and CTP update. Earthjustice submitted four comments during the period and included discussion on emission targets, improved measure descriptions, zero-emission trucks, and need for robust community engagement. Regarding emission targets the environmental groups raised similar concerns that the agencies brought up regarding the near targets set by CAAP stating, “even with reductions since 2005, the Ports still impose high risks to neighboring communities and contribute greatly to our region’s failure to meet state and federal air quality standards” (CAAP, 2017b, p. 7).

The GASP! Coalition recommended that CAAP increase near-term economic incentives, interim milestones, and better driver treatment. In addition to the economic and environmental concerns, GASP! states:

The current plan does not propose much to satisfy the public that drivers will be treated fairly and with dignity in this new system. In fact, the program sounds like a lot of the same old strategies. Massive incentives for new trucks, and it is clear that this industry has a propensity to push these types of increased fees onto drivers (CAAP, 2017c, p.131).

South Bay 350 focuses its work in the South Bay and Los Angeles Harbor areas with a focus on addressing environmental justice issues in frontline communities. They discuss the effects that CAAP and CTP have had on the community and it engages with the issues that the interviewees brought up. While CAAP has made significant improvements to the air quality in the surrounding areas, there is still significant pollution in the area. Additionally, the South Bay 350 comment raises issue with the treatment of workers and the hours that they are forced to

work in order to maintain their trucks. They state, these “realities [are] inequitable, they put the truckers who are operating such long hours and members of the general public in grave danger due to fatigue-related accidents” (CAAP, 2017c, p.130).

Community Stakeholders

Key Findings

- Concern with the cost and funding of the program
- Recognition of worker exploitation
- Setting goals is not enough to meet the necessary emission reductions—the plan needs stricter goals

Community stakeholders included neighborhood groups, city councils, and individuals.

78.8% of all of the comments received were from community stakeholders. After examining comments from the first period, the majority of the comments were not substantive or related to the research. The San Pedro Neighborhood Council discussed the need for the plan to incentivize drivers and offer rebates for cleaner trucks saying, “truckers shouldn’t go broke or get pushed out of the market. The majority of the fees need to be paid by corporations and businesses that utilize the trucks to move their goods, not truck drivers” (CAAP, 2017b, p. 13).

This shows that there is community recognition of the unfair cost burden that CTP has indirectly placed on the drivers. Other comments from this period echoed concerns about the timeline for the program and the costs associated with all aspects of the update.

It became clear when looking through this category that there had been an organized effort from ACT Now LA to get community members to submit comments. I closely examined 43 of the comments in this category and 31 of the comments were a standard response that said:

We can't wait 17 years to get toxic diesel polluting trucks off our roads. Let's accelerate the CAAP: incentivize trucks in 2018 – instead of waiting six years. Let's use the most advanced technology now to lower emissions and clean our air (CAAP, 2017a, p.957).

These comments were likely copied and pasted from a proposed comment from a local community group. When sorting through the remainder of the comments in the “community” category, there were many more standard responses similar to this. These standard responses seem more concerned with the environmental agenda than with improving working conditions for drivers. They are somewhat uneducated in suggesting that incentivizing trucks can be accomplished immediately considering the exorbitant costs associated with clean trucks.

Of the remaining, twelve non-standard comments that were examined from this group brought up employee models for trucking highlighting that the community views it as a relevant issue. Additionally, the costs associated with the CAAP update came up 10 times, suggesting community concern with who will face the costs associated with the program. A comment from John McLaurin mentioned that drivers should not face the burden of costs associated with updated emission goals, he stated, “these strategies will place an enormous financial burden on the Ports and the goods movement industry.” While the standard response urges for an expedited goal, comments written by other individuals urge CAAP writers to consider the financial burden that the update program will have on those directly affected by the program.

Summary of Comment Findings

Key Comment Findings

- **All groups** concerned with the cost and funding of the program
- **All groups** acknowledged worker exploitation
- **3 groups** concerned about environmental impacts
- **2 groups** urge for stricter goals
- **1 group** raised concern over program compliance and enforcement

From the above analysis of the public comments received over the year-long period, it is clear that concerns exist with the costs associated with the plan, the treatment of workers, and compliance issues. While most comments began by applauding the goals and reductions that CAAP/CTP have created, they all urge for the program to set different standards in order to meet the needs of the surrounding communities. Comments question the costs associated with the program and are left wondering who will be responsible to pay. The main worry is that this iteration of the plan will continue to worsen the exploitation of drivers as they are left facing the brunt of the costs. The public is concerned with the emission goals not being stringent enough and that compliance will lack like it has in past years. The comments overwhelmingly support the same concerns that the interviews brought suggesting that these findings are valid issues that need to be addressed through future plan updates.

Concession Agreements

I examined changes made to the Clean Truck Program concession agreement from its first four drafts. The purpose of this was to see how the language of the agreement changed over time from the original conception until the current draft. Analysis of the concession agreements is crucial to answering the research question as it is the main piece of the CTP policy that can discuss the treatment of workers. The concession agreement is a key element to the CAAP and CTP and it is the part of the policy that lays out CTP regulation and compliance timelines. Additionally, companies must become concessionaires in order to operate in the port complex. In other words, trucking companies are only allowed to send drivers into the port if they have signed the concession agreement and paid the concession fees. Essentially, the concession agreement is the doctrine that companies must follow in order to operate drayage

services. The agreement specifies, “Concessionaire's right of access to and use of the Port’s facilities under this Concession shall be solely for the purpose of conducting Drayage Service unless the Concessionaire obtains the Executive Director’s prior written permission to access Port’s property”(Port of Los Angeles & Port of Long Beach, 2013, p. 1). Over time, the language and the sections included in the concession agreement have changed to reflect wishes of various stakeholders as well as the courts. Analyzing the agreements helps to show the change in worker treatment over time.

Six main components of the concession agreement that are relevant to the treatment of drivers can be found in Table 3. These components have seen change over time and demonstrate the wins and losses that drivers have faced through the concession agreement.

Table 3. CONCESSION AGREEMENT COMPARISON

Concession Year	2008	2010	2013	2014
“Employee Mandate” ^a	X	X		
Compliance necessary for port operation	X	X	X	X
Affirmative Action Clause		X	X	X
Wage and Earnings Assignment Clause		X	X	X
Comprehensive/Detailed Draft ^b	X	X	X	
Includes proposed Tariff No. 4 Amendments ^c	X			

^a Employee mandate refers to a provision of the concession agreement laying out a requirement for concessionaires to transition to employee drivers.

^b Draft considered comprehensive if broken into detailed sections explaining the concession requirements. The 2014 agreement is considerably shorter and less detailed.

^c Tariff No. 4 describes the rates, charges, rules, and regulations of the Port of Los Angeles.

The employee mandate is the key provision of the CTP that required concessionaires to move towards 100% employee drivers within 5 years. The loss of this provision in later drafts signifies a major loss for drivers and demonstrates that conditions have not improved. Inclusion of the affirmative action clause and the wage clause are beneficial to drivers because it requires companies to abide by these rules. These clauses demonstrate the port’s concern with the

treatment and hiring practices of employees. Table 3 demonstrates how conditions have changed over time for better and worse. The agreements with more boxes marked are better for drivers, so as this section will discuss, the 2010 version of the concession agreement was the strongest for drivers and 2014 is the weakest.

2008 Concession

The 2008 agreement was the first agreement passed as part of CAAP/CTP and it includes a comprehensive list of 13 concession requirements that detail the terms of the agreement. The most highly contested piece of the agreement is section III (d) titled “driver hiring.” This is the section that contains the employee-driver mandate that specifies that in order to operate in the port, concessionaires must “transition its Concession drivers to 100% Employee Concession drivers by no later than December 31, 2013”(Port of Los Angeles & Port of Long Beach, 2008, p. 2). The concession agreement laid out a table for the transition period with intermittent goals to move toward employee status. The language in this section references that concessionaires are allowed to utilize independent contractors and owner-operators during the transition period but must have all employee drivers by the end of the concession term.

This initial agree also contains eighteen pages of findings to substantiate the purpose of the concession agreement and proposed Tariff No. 4 amendments. Port of Los Angeles Tariff No. 4 describes the rates, rules, and regulations of the port and is considered a governing document. The findings section attached to the concession agreement legitimizes the employee provision stating:

Many drayage truck drivers have testified at the Board of Harbor Commissioners meetings of both Ports of Los Angeles and Long Beach, stating that they are unable to afford and maintain the cleaner trucks needed to achieve air quality standards, even

with the subsidies proposed to be offered by the Ports (Port of Los Angeles & Port of Long Beach, 2008, p. 38).

The policy goes on to explain that one of the 6 main goals for the concession agreement is to ensure sufficient supply of drayage drivers through while improving wages, benefits, and working conditions. From the start, the concession agreement intended to help drivers receive better pay for the work that they do and it planned to mitigate the costs associated with the CTP. The findings section clearly states that the drivers are unable to afford the costs associated with the program as it currently stands and an employee provision would lessen the cost burden that drivers face. The inclusion of this section with the first concession agreement provides critical background information justifying the various sections in the agreement.

2010 Concession

The 2010 agreement looks very similar to the 2008 concession with a few important sections added. It is important to note that this agreement was passed during the litigation, so the driver hiring section is still included in the agreement. In the concession requirements section a subsection titled “Financial Capability” was added to ensure that concessionaires are financially capable of performing the obligations that are laid out in the agreement.

Additionally, this draft includes two new main sections. One section is a standard affirmative action clause stating that the port and concessionaires shall not discriminate in its employment practices. The second section is titled “Wage and Earnings Assignment Orders/Notices of Assignments” which requires concessionaires to oblige by state and federal employment reporting requirements (Port of Los Angeles & Port of Long Beach, 2010). Aside from these additions, the language from 2008 to 2010 did not change. This revision was made after the August 2010 court decision which upheld the employee-driver provision, but the American

Trucking Association appealed to US Court of Appeals in the Ninth Circuit. As a result, the ports decided to refrain from enforcing the provision until a final decision had been reached in litigation. The 2010 concession agreement is still the strongest for drivers as it includes the employee provision as well as the added wage and affirmative action clauses.

2013 Concession

By 2013 the Supreme Court had ruled that the concession agreement could not contain Sections III (f) Compliance with Truck Routes, III (l) Placards, and III(d) Hiring (Kagan, 2013). This left the 2013 Concession Update without the employee-driver provision. Additionally, the Ports amended the agreement to extend the length of the agreement from five to six years, which meant that agreements would now expire September 30th, 2014. It is unclear why the ports chose to extend the concession term instead of passing a new agreement with the necessary provisions redacted. Since the agreement was set to expire, the port could have passed a new concession, but instead, they extended the term and deleted three subsections. The language in the agreement has remained the same and the document still shows the subsections that been removed—it simply says “(d) Deleted”(Port of Los Angeles & Port of Long Beach, 2013, p.2). By leaving the subsections in the document, the port is recognizing that driver rights are still relevant and important. This agreement does not contain any proposed amendments to Tariff No. 4, even though the language in this agreement alters port regulations. By not including the changes that will be made to Tariff No. 4 alongside this agreement, individuals could be left to believe that the regulatory document would not be changed.

2014 Concession

In 2014, the original concession agreement was set to expire so the ports revised and update the agreement. This was an opportunity for the port to amend the previous agreement that had lasted for six years. The 2014 agreement goes back to a five-year term and is set to expire on September 30th, 2019 (Port of Los Angeles & Port of Long Beach, 2014). This agreement is significantly condensed with only 4 pages of terms, compared to the prior agreements that contain around 16 pages of terms and requirements. As a result, the 2014 agreement lacks the detailed explanation of the concession requirements and makes no mention of the employment status of the drivers. This concession is formatted to look more like a contract than an official policy document, which makes it seem less important. Additionally, the terms and conditions are placed after the application and required signatures making it possible for concessionaires to sign the agreement without even looking at the terms. Past agreements listed all of the terms and requirements and then made space for the harbor commissioner's and the concessionaire's signature. Although this agreement places the signatures first which seemingly puts less weight on the terms of the contract, it does require two signatures from different members of the concessionaire's company. Overall, the updated concession agreement appears to be less concerned with the terms and requirements of the agreement than the previous agreements. With no mention of driver employment status, the ports are likely avoiding the issue after facing 5 years of litigation with the initial agreement. While this was likely a strategic move to avoid further issue, it minimizes the issue that the port intended to tackle by including the employee-provision in the first place. For how heavily the

2008 concession emphasized the importance of fair wages for the drivers, the ports now seem completely uninterested in pursuing the issue.

Interviews

I conducted 3 exploratory interviews and table 4 breaks down who the interviews were with and the capacity in which they are involved with the issue.

<i>Table 4. PARTICIPANT DEMOGRAPHICS</i>				
Name	Sex	Category	Occupation	Started
Daniel Aneseko Uaina	M	Driver	Port truck driver for Intermodal Bridge Transport	2013
Owen Harvey Vaea	M	Driver	Port truck driver for Intermodal Bridge Transport	2013
Nick Weiner	M	Expert/ Advocate	Campaign Director: Change to Win/ International Brotherhood of the Teamsters, Justice for Port Drivers Campaign	2006

Driver Interviews

In order to understand how the driver community that has been directly affected by the issue, I reached out to several drivers. Throughout our conversations, many common themes came up including their treatment at work, their employment status, positive view of CTP and CAAP, as well as a positive view of the industry and work that they do – see table 5.

<i>Table 5. RECURRING INTERVIEW THEMES</i>
<i>Workplace Treatment</i>
<i>Employment status</i>
<i>Positive view of CAAP and CTP</i>
<i>View on industry and work</i>
<i>Necessity of reclassification</i>

Employment Status

“I was under the impression that I was an employee but just get paid by the load...” —(Vaea, 2018).

Daniel Aneseke Uaina, known in the drayage community as Seko, has been driving with Intermodal Bridge Transport (IBT) since late 2013. Prior to this, he had been working in an attorney service doing court filings. Due to an industry fade out, Uaina transitioned into a new industry. He joined IBT and was told he was a 1099, meaning he was an independent contractor. But something was not quite right and Uaina said:

The odd thing was that in the beginning on our contract, the heading was “application for employment.” The staff at Intermodal Bridge Transport explained to me that, “yea you are an employee, but we just pay you different. But, trust me you are going to be benefitting a lot from this” (Uaina, 2018).

The lack of clarity regarding his employee status, left Uaina with an uneasy feeling as he continued to work with the company. As time went on it became clear to him that he and other drivers were not employees although they lacked the control that an independent contractor should have.

Owen Harvey Vaea, an IBT driver since 2013, had an experience just like Uaina’s when it came to his employment status. He said, “when I came to IBT I was under the impression that I was an employee but just get paid by the load” (Vaea, 2018). Vaea had some experience working in the ports prior to IBT but he was never in the ports fulltime until he started with IBT. This led him to believe that the pay for port work was just handled differently than his past driving job for a food delivery service.

Many drivers find themselves in situations not knowing the rights that they have as independent contractors, and not understanding that they should truly be classified as

employees. As a result, drivers soon discover that the high wages that a company promises are not what they will really receive. Uaina explained, “I was paying the fuel, the maintenance, the insurance, damages, and the lease for a truck that would never be mine” (Uaina, 2018). Uaina shares a truck with another driver, so the company is collecting two lease payments for one truck. All of these added costs take away from the paycheck that drivers receive each month in the form of deductions, “whenever I go into work and there is work and a truck available, I am to owe the company a lease payment for that day” (Uaina, 2018). Added expenses are truly company overhead and should not be the responsibility of the driver.



THE LIFE OF A PORT TRUCK DRIVER

- Average work week: 59 hours
- Median net earnings before taxes:
Independent Contractors: \$28,783
Employee Drivers: \$35,000
- Independent contractors pay all truck-related expenses, like fuel, maintenance, and repair costs

(Smith et al., 2014).

Vaea found that new drivers would consistently receive better loads and more loads in order to keep them, “since I was a new driver they gave me good loads and as time goes on you start to get the crap” (Vaea, 2018). Drivers that have been with the company longer stop getting the good loads and instead receive loads with long wait times making it so that they do not get through as many loads in a day. Even with fewer loads, they still receive the same

deductions from their pay. This in turn, leads to smaller paychecks that sometimes reach negative numbers.

When rumors spread that drivers at Shippers Transport Express were earning back deducted wages that had been stolen, drivers at IBT began to wonder if they were under the same condition. Vaea expressed that, “as time went on I realized that a lot of the drivers in the port were not happy” (Vaea, 2018). Soon after a lawyer met with drivers at IBT to explain how the deductions truly belong to the drivers. “That was something that really motivated me to find out the whole and absolute truth, and to really just fight against the company on what we should have had in the beginning” (Uaina, 2018). Vaea came to the ports from a job where he was paid hourly, received workman’s comp, and benefits, so he understood how employee drivers should be treated. The knowledge that something was not right and hearing that other drivers were fighting against the misclassification issue, activated Uaina and Vaea to do something for themselves and other drivers.

Workplace Treatment

Table 6. UNEQUAL WORKPLACE TREATMENT FOR CONTRACTED DRIVERS
“we aren’t allowed inside the building in the yard...”
“there is a glass window that we approach for new loads, but we can’t go inside”
“the ports were a ‘no-no’ for other drivers, they knew how bad it was”

Both drivers continually mentioned the poor treatment that they receive at work and the increased hostility in the workplace that has stemmed from the employment status challenge. Vaea expressed that “once they saw us starting to make a change they start doing some negative things in terms of the way they treat us” (Vaea, 2018). There are potholes in the yard and drivers will step out of their truck and twist their ankles. Both drivers emphasized the

poor lighting in the yard and the dirty outhouses that are not cleaned nearly as often as they need to be. Uaina elaborated, “we had to fight to get a clean break room in the yard and we can’t even use the facilities inside the building” (Uaina, 2018). They expressed that other drivers stay away from the ports because they know how poorly the drivers are treated in the ports.

In addition to the poor working conditions, drivers expressed concerns over the competitiveness within the workplace. Vaea has seen drivers fight over chassis in the port and in the yard. He knows that drivers run lights at night which causes a huge safety issue. Drivers behave in this way in order to make their loads and get to the next one sooner, Vaea said, “drivers will get stuck at one port for hours and the next run they are trying to make up for it” (Vaea, 2018). Since the drivers are paid by the load they have to be as efficient as possible, but when they receive bad loads it limits their ability to complete as many.

Vaea and Uaina both described the favoritism that dispatchers have towards drivers. The dispatchers assign loads in the yard and are responsible for deciding who gets the good loads. “If you’re not one of their favorites, you’re going to starve” (Vaea, 2018). They have witnessed favorite drivers start their sixth day of work for the week before some drivers get assigned loads for their fifth day. Loads are not distributed equally and ten loads will go to three favorite drivers instead of ten drivers. “I’ve talked to drivers who worked at other companies and left because of the way dispatch ran” (Vaea, 2018). When drivers complain about the unfair distribution, they are given the bad loads and get stuck at the port for hours.

Table 7. DRIVER PERSPECTIVES OF CTP/CAAP

"I think the plan is great and it's doing great things for the air we breathe"

"...you could see the green smog and the wait lines in the port were like oil slicks"

"it's a whole lot cleaner and clearer now"

Our conversations shifted towards discussion of the Clean Air Act and Clean Truck Program. Uaina and Vaea were both new to the drayage industry during the implementation of the program so they were not forced to buy a new compliant truck, but they know drivers that did. Uaina explained:

IBT promised them that they were going to get new trucks that fit all of the Clean Air requirements. That they should sell the old truck and would be able to lease-to-own the newer trucks. They would become owner-operator again. But that never materialized (Uaina, 2018).

Vaea reiterated Uaina saying, "drivers thought they were going to pay the companies to own the truck, but they ended up keeping it and leasing it" (Vaea, 2018). Drivers who once owned their truck were now forced to pay leases on a truck that they will never own. It is a never-ending lease at IBT, "we are just basically renting a truck from them and renting all of the equipment in order to do all of the work" (Uaina, 2018). Drivers that have been around since the adoption of CTP could not afford new trucks or to retrofit their current truck in order to comply. They were forced to become more dependent on the company and the companies have taken advantage of the drivers as result. With the knowledge that drivers would not be able to purchase compliant trucks, companies took advantage of that and have begun never-ending lease-to-own options for clean trucks.

While the drivers do not support how the CTP has forced individuals onto never ending leases to own a truck, they do recognize the importance of the emission reductions that CAAP

and CTP have brought to the port. Vaea had visited the port for work prior to the implementation of the plan and remembers seeing all of the smog and the oil slicks in the wait lines, “the trucks would always be leaking and the guys would constantly be fixing them” (Vaea, 2018). Since returning to the ports full-time he has noticed significant improvements to the air quality and the conditions of trucks.

“Even on a night where you are in the port for only one or two hours, the fumes and toxic chemicals stick to you” – (Uaina, 2018).

Regardless of the exploitation that has resulted from the adoption of the CTP in the ports, Uaina thinks that the environmental improvements to the area are necessary and important. He grew up right by the Ports in the city of Carson and remembers days where he couldn’t see the nearby hills. The air has drastically improved, “every day I go to work and there is this soot and it sticks to you. Even on a night where you are in the port for only one or two hours, the fumes and toxic chemicals stick to you. It sticks to you like the gum at the bottom of your shoe” (Uaina, 2018). They are sitting in that and breathing it in every day alongside the 10,000-12,000 other drivers in the port. The amount of exposure to these chemicals and the air quality is huge, and while there have been noticeable improvements over his lifetime, Uaina acknowledges the importance of the continued efforts of CAAP and CTP.

Reclassification Issues

Table 8. BENEFITS OF DRIVER RECLASSIFICATION
“if everyone was getting paid decently or hourly, I think it would be a whole lot safer and better environment”
“in a way, the companies would have more control over us as employees and the work product would be better as a result”
“companies who are misclassifying should be banned from the ports”

Moving the discussion more towards the Clean Truck Program and the responsibility that it has to address the misclassification issue, Uaina and Vaea believe that an employee mandate would be a step in the right direction. The mandate would have addressed issues of wages, benefits, and health issues that are left unhandled for independent contractor drivers. Employee drivers and company sponsored trucks should be an industry requirement in Vaea's opinion. According to Uaina, the employee mandate would have made a huge impact on the industry and likely made it a more desirable form of trucking. Port drivers are able to go home each day and see their families, which is uncommon for long-haul drivers who are often on the road for weeks at a time. The availability to go home and watch your children grow up is a huge draw for the industry, and better wages would make the position even more desirable.

Vaea believes that an employee model would make more sense for the companies to adopt because it would allow them to have more control over the drivers. Ultimately, he believes that the companies choose the independent contractor model because of greed, "they don't want to pay payroll tax or benefits. They want to fire whenever they want. Upstairs they are looking for the big paychecks" (Vaea, 2018). Switching to an employee model would force the dispatchers to be efficient. A hard transition at first, but ultimately employee drivers would be more efficient and more accountable.

Looking ahead, drivers like Uaina want to bring more awareness to the issue and navigate channels to encourage businesses to help out employees. Currently, companies are taking advantage of government grants for the Clean Truck Program to fund the purchase of trucks that are then being leased to drivers. This, in turn, is forcing drivers to pay for trucks that the program has already funded. Uaina wants drivers to have a fair share of what they deserve

for the work they are doing, “I’m not asking for a huge piece of it, just more than the table scraps that we currently get. I want something fair that gives us a seat at the table” (Uaina, 2018).

Policy Expert/ Advocate Interview

The interview with the policy expert/advocate focused heavily on how policy can change in order to address the exploitation of drivers while simultaneously advancing environmental goals.

Nick Weiner is the director of the Change to Win/International Brotherhood of the Teamsters’ Justice for Port Truck Drivers campaign. This campaign began as a strategic organizing campaign for places where unionizing had been decimated. Since deregulation of the trucking industry in 1980, the unionization of drivers has fallen significantly. This has resulted in poor wages, bad benefits, and misclassification of drivers across the drayage industry. The campaign has found that the drayage industry has some of the most exploited workers in the country. Weiner explained, “Seaports and Airports are the pieces of the US supply chain that are publicly owned. So, there is this social responsibility component and accountability to elected politicians and to the community” (Weiner, 2018). The portion of the supply chain that is publicly owned has resulted in the worst exploitation of workers, so there needs to be a level of accountability for the public. Exploitation has persisted as a result of industry deregulation and the fact that the ports cannot be moved. Goods need to enter the country and the ports in Los Angeles and Long Beach are microcosms of the entire economy. Most employers are hiring trucks to bring their goods to them, at any time “there are only a couple degrees of separation between any stakeholders and the port” (Weiner, 2018). The ports are essential to the

economy and the supply chain would not function without ports and drivers who are able to move the goods.

“Only about one-third of the wage claims ever get recovered by workers” —(Weiner, 2018).

The misclassification of drivers has persisted largely in part due to weak labor law enforcement. Across the country states lack the resources to adequately investigate labor issues, some states only have 1 or 2 investigators for the entire state. Weiner explained:

California is kind of the exception. They are at the top of the states that put significant resources and priority into enforcing labor law. Even in California, if you look at the reports, only about one-third of the wage claims ever get recovered by workers. What that says is that there is a problem with enforcement and the laws of enforcement aren't robust enough to be a deterrent (Weiner, 2018).

Driver misclassification is a consequence of a broken system. The deregulation of the industry started the issue and it persists as a result of poor enforcement.

As one of the writers of the Clean Truck Program, Weiner reflected on the failed employee mandate from the original plan, “there was a false dichotomy to have clean air or good jobs. We wanted to establish that you could have both” (Weiner, 2018). Writers understood that eliminating dirty trucks would be costly and not feasible for most drivers, so they intended to shift the responsibility on to the employer. The failed mandate would not have fully addressed the misclassification issue, but it would have prevented future misclassification. Poor enforcement of labor laws would prevent the mandate from being fully effective.

The failed employee mandate and successful adoption of the CTP, has made the situation worse, “the expenses associated with the program roll down the hill and make things worse for drivers” (Weiner, 2018). Recognition that the misclassification issue has worsened

since the adoption of the CTP has paved the way for new drafts to address the issue. The need for broad-based solutions and requirements with incentives and deterrents to classify drivers appropriately. Weiner mentioned legislation that will be introduced in the coming months that will address the issue. Without giving any details, Weiner expressed that this policy will address employment issues while working around the technicalities that caused the initial mandate to be struck down. Preliminary policy ideas have been introduced to the city councils in Long Beach and San Pedro suggesting the need for the ports to move towards an employee model. This conversation acknowledged that future iterations of the program need to address the misclassification issue while continuing to clean up the air.

RECOMMENDATIONS

My research leads to several strategies that can be introduced into the CTP and the POLA/POLB to improve conditions for drivers and to reduce misclassification. Based off of recurring themes that came up during interviews and in the comments, it became clear that future iterations of CAAP and CTP need to address driver misclassification and the cost burdens associated with the program.

Table 9. RECOMMENDATIONS

1. Require companies to provide clean break areas and fair treatment of workers
2. Set stricter emission standards and specify who is responsible for the cost of updates
3. Increase wages per load or set hourly rate
4. Update the concession agreement and CTP to mention drivers
5. Increase labor law enforcement and compliance through the California labor commissioner
6. Propose and pass policies that require drayage firms to use employee drivers

1. Require companies to provide clean break areas and fair treatment of workers

Drivers continually mentioned the poor conditions that they work under in the company yards. They feel as though they are treated as second-class citizens and dispatchers exemplify extreme favoritism towards some drivers. I recommend that drivers organize to fight for better working conditions and fair workplace treatment. In addition, a provision should be placed in the concession agreement that requires logistics firms to provide clean break areas and sanitary bathroom facilities. If drivers are treated more fairly they will produce a better work product. Additionally, if dispatchers are required to dispatch loads in an equitable way, the companies will increase efficiency by having more drivers complete loads instead of saving loads for their

favorites. Eliminating dispatcher favoritism will run into compliance issues that already exist within companies, recommendation 5 will discuss how to handle compliance.

2. Set stricter emission standards and specify who is responsible for the cost of updates

The most common concern that the CAAP update comments brought up was with the timeline and goals for the emission reduction. Environmental groups, community members, industry members, and agencies all expressed concern with the pace of the emission goals. Future iterations of CAAP need to consider feasible goals and potentially create stricter emission reduction goals. Per SCAQMD's assessment, the reductions set in the most recent CAAP draft are nowhere near the reduction goals that are achievable (CAAP, 2017a). In addition to the reduction concerns, stakeholders expressed worries over who is going to be responsible for the costs associated with updating equipment to meet the standards. The update estimates roughly \$7 - \$14 billion in costs for the updated technology but does not mention where this money will come from (Port of Los Angeles & Port of Long Beach, 2017). The fear is that truck drivers and other laborers in the port will face the brunt of these costs once again, whether directly through purchasing new equipment, or indirectly through reduced wages as a result of increased company costs. The recommendation is for the Ports to complete a more detailed cost analysis for the CAAP and CTP updates and specify where the money for the program will come from. By doing this, it will become clear who is responsible for the costs of the update and it will result in a level of accountability.

3. Increase wages per load or set hourly rate

With the understanding that an employee mandate is not possible through CTP, the program should instead regulate the wages that drivers are paid. This can be done through changing contracts to be hourly instead of per load, or it can set a minimum pay per load. If drivers are paid hourly, they will be guaranteed a set rate regardless of how many loads they complete. A huge part of the pay issue is that drivers get paid the same amount for a load that takes 3 hours and a load that takes 45 minutes. Switching to hourly will ensure that drivers are being adequately compensated for the work that they are completing. An alternate option to hourly pay would be to increase the wage that drivers receive per load. The ports currently collect statistics on who is entering what port, so they could average the number of loads that drivers complete per day and set a pay per load that results in something livable at the end of a pay period. While the ports likely could not require this, as it would result in litigation like the initial plan, including a strong recommendation in the concession agreement could incentivize companies to increase wages. Alternatively, the port could implement an incentive program for companies that pay their drivers fairly. By paying drivers more per load or setting an hourly wage, companies will increase efficiencies in order to save money. Company dispatchers will no longer be able to display blatant favoritism in order to dispatch more efficiently and save the company money.

4. Update the concession agreement and CTP to mention drivers

The current draft of the CTP mentions drivers once in twelve pages of the document (Port of Los Angeles & Port of Long Beach, 2017). In addition, the current concession agreement

only mentions drivers in terms of following safety and environmental guidelines. No mention is made of the composition of the industry, or that underlying structural problems exist within the industry. By leaving this out, it leaves people under the impression that the problems that exist within the industry that have been continually mentioned since the first draft in 2006 have been resolved. This is simply not the case, so the POLA/POLB need to include some mention of the issue either in the CTP portion of CAAP or in the concession agreement. Again, this does not need to come in the form of requirements, but the documents need to acknowledge the systemic issues that exist in the drayage industry. These issues have persisted and gotten worse in the last 11 years, and have not been resolved as the update could lead one to believe.

5. Increase labor law enforcement and compliance through the California labor commissioner

Interviewees brought up that a big issue with the persistence of misclassification in the industry stems from poor compliance and enforcement with the labor laws. While California has one of the most effective labor boards, they still lack resources necessary to enforce compliance. Drivers expressed concern that even though misclassification and wage theft cases are won and companies are told to reclassify and pay lost wages, the companies often do not comply. Drivers worry that even with stricter regulations in updated CTPs the industry will not change because there is no one to enforce the rules. In order to increase compliance, the California Labor Commissioner should set up a task force to ensure that companies are following and abiding by the rules of the program and the rulings that the commissioner makes. The commissioner has overwhelmingly sided with drivers and found that they are truly employees, yet the companies continue to misclassify drivers (CAAP, 2017, p.229). The best

recommendation to resolve this issue is to increase labor commission staff to ensure that companies are resolving issues. By dedicating a few staff members to the ports, companies will understand that they will face consequences for noncompliance.

6. Propose and pass policies that require drayage firms to use employee drivers

The last recommendation that this research leads to, is for the ports or surrounding cities to pass policy that ensures that companies are using employee drivers and that the misclassification issue does not persist further. When cities finally recognize that there is an exploitation issue, they will be able to create policy that includes broad-based solutions to the problem. This would look similar to the employee provision that was in the initial CTP, but it must work around the technicalities that resulted in the initial mandate being struck down by the court. I recommend that local, state, and federal legislative groups add language to support legislation that will improve working conditions for drivers. Current legislation is under works, but it needs to be released and passed as soon as possible before the issue persists even further.

CONCLUSION

The Port of Los Angeles and the Port of Long Beach need to update the CTP to address misclassification issues and improve conditions for drivers. The interviewees and the stakeholders that commented on the most recent CAAP/CTP update expressed concern over the exploitation of drivers, the program's emission reduction timeline, and the costs associated with the program. POLA/POLB need to address these concerns and alter the policies accordingly. There need not be a false dichotomy of clean air or good jobs, it is possible for the ports to create a plan that ensures both. The current CTP has worsened conditions for drivers and increased operation costs making the plight of misclassified drivers even worse. Resolving the issue will take a multi-faceted approach. Policies need to be put in place to increase driver pay and shift drayage companies toward an employee only model. Additionally, the only way that the program will be truly successful is through stricter enforcement, it is not enough to simply alter the program to safeguard drivers and provide better working conditions. Future concession agreements must increase language around drivers and recognize the employment issue facing the ports. If the necessary steps are taken, it is possible for future Clean Truck Programs to address the misclassification and improve driver conditions.

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Appendices

Appendix A: Interview Questions

For policy experts: I will ask open-ended questions about an individual's familiarity with the Clean Trucks Program.

1. What has been your involvement with the Clean Trucks Program?
2. How do you view the driver misclassification issue?
3. What can you tell me about the Port of LA/LB Clean Trucks Program?
4. How do you think the employee mandate would have addressed the labor issues facing drayage drivers?
5. With the now void mandate, how do you think future CTP revisions can address misclassification issues?
6. What do you think can be done to address these issues?
7. What are some of the impacts that the CTP has had on independent contracted drivers?
8. From your experience, why do you think companies choose the independent contractor model?
9. Is there anything else you want to share?

For Drivers: My questions will focus on their experiences as misclassified drivers

1. How do you feel about the Clean Trucks Program and how it has impacted Port Operations?
2. Are you familiar with the employee mandate in the initial plan? If so, how do you think it would have addressed the misclassification issue?
3. From your experience, why do you think companies choose the independent contractor model?
4. Can you explain some of the direct impacts that the CTP has had on your work?
5. If you could solve the misclassification issue, how would you do so?
6. What revisions would you like to see made to the CTP?
7. Is there anything else you want to share?

Appendix B: List of Comments by Category

TYPE	TITLE	PERIOD
ACADEMIC/AGENCY	California Air Resources Board (February 17, 2017)	Nov16-Jun17
ACADEMIC/AGENCY	South Coast Air Quality Management District (February 17, 2017)	Nov16-Jun17
ACADEMIC/AGENCY	UCLA Community Scholars Class (February 20, 2017)	Nov16-Jun17
ACADEMIC/AGENCY	University of California, Riverside (February 17, 2017)	Nov16-Jun17
ACADEMIC/AGENCY	Southern California Gas Company (October 31, 2017)	Sep17-Nov17
ACADEMIC/AGENCY	California Air Resources Board (September 18, 2017)	Jul17-Sep17
ACADEMIC/AGENCY	Mount San Antonio College (August 28, 2017)	Jul17-Sep17
ACADEMIC/AGENCY	South Coast Air Quality Management District (September 18, 2017)	Jul17-Sep17
ACADEMIC/AGENCY	University of Riverside, College of Engineering – Center for Environmental Research & Technology (August 28, 2017)	Jul17-Sep17
COMMUNITY	Kim Carroll (August 26, 2017)	Jul17-Sep17
COMMUNITY	Benjamin Lopez (September 14, 2017)	Jul17-Sep17
COMMUNITY	Brandon Molina (August 30, 2017)	Jul17-Sep17
COMMUNITY	Case Wong (September 6, 2017)	Jul17-Sep17
COMMUNITY	Aarno Diocson (September 18, 2017)	Jul17-Sep17
COMMUNITY	Aaron Hooker (September 13, 2017)	Jul17-Sep17
COMMUNITY	Abraham Estraad (September 5, 2017)	Jul17-Sep17
COMMUNITY	<i>ACT Now LA</i>	Jul17-Sep17
COMMUNITY	Adele Snyder (September 5, 2017)	Jul17-Sep17
COMMUNITY	Adimir Barahona (September 5, 2017)	Jul17-Sep17
COMMUNITY	Adina Brandon (September 16, 2017)	Jul17-Sep17
COMMUNITY	Adrina Garcia (September 18, 2017)	Jul17-Sep17
COMMUNITY	Alberto Damian (September 18, 2017)	Jul17-Sep17
COMMUNITY	Alberto Troncoso (September 8, 2017)	Jul17-Sep17
COMMUNITY	Alejandra Kostuch (September 18, 2017)	Jul17-Sep17
COMMUNITY	Alejandra Ramirez (September 18, 2017)	Jul17-Sep17
COMMUNITY	Alejandro Aguilar (September 18, 2017)	Jul17-Sep17
COMMUNITY	Alejandro Marquez (September 18, 2017)	Jul17-Sep17
COMMUNITY	Alejandro Pelayo (September 11, 2017)	Jul17-Sep17
COMMUNITY	Aleta (September 14, 2017)	Jul17-Sep17
COMMUNITY	Alexandra Radford (August 22, 2017)	Jul17-Sep17
COMMUNITY	Alicia Cox (September 15, 2017)	Jul17-Sep17
COMMUNITY	Alicia Isaslazo (September 16, 2017)	Jul17-Sep17
COMMUNITY	Allen Aronson (September 18, 2017)	Jul17-Sep17
COMMUNITY	Alvaro Perez (September 2, 2017)	Jul17-Sep17
COMMUNITY	Alvaro Perez (September 8, 2017)	Jul17-Sep17
COMMUNITY	Amanda Peterson (September 18, 2017)	Jul17-Sep17
COMMUNITY	Ana Villanueva (September 18, 2017)	Jul17-Sep17
COMMUNITY	Andrea Campbell (September 6, 2017)	Jul17-Sep17
COMMUNITY	Andrea Helzer (September 13, 2017)	Jul17-Sep17
COMMUNITY	Andrew Boven (July 25, 2017)	Jul17-Sep17
COMMUNITY	Andrew Williams (September 8, 2017)	Jul17-Sep17
COMMUNITY	Andy Carrasco (August 28, 2017)	Jul17-Sep17
COMMUNITY	Angela Bradford (August 28, 2017)	Jul17-Sep17
COMMUNITY	Angela Bradford (September 14, 2017)	Jul17-Sep17
COMMUNITY	Angela Manzo (September 18, 2017)	Jul17-Sep17
COMMUNITY	Angela Mitchell (September 13, 2017)	Jul17-Sep17
COMMUNITY	Anil Desai (September 13, 2017)	Jul17-Sep17
COMMUNITY	Ann Cantrell (September 13, 2017)	Jul17-Sep17
COMMUNITY	Ann Cavanagh (September 18, 2017)	Jul17-Sep17
COMMUNITY	Anna Ernehholm (September 14, 2017)	Jul17-Sep17
COMMUNITY	Anne Baham (September 18, 2017)	Jul17-Sep17
COMMUNITY	Anthony Montapert (August 30, 2017)	Jul17-Sep17
COMMUNITY	Antonietta Barbera (September 18, 2017)	Jul17-Sep17
COMMUNITY	Arleta Roberts (September 18, 2017)	Jul17-Sep17
COMMUNITY	Ashley Hernandez (August 30, 2017)	Jul17-Sep17
COMMUNITY	Ashley White (August 30, 2017)	Jul17-Sep17
COMMUNITY	Asian Pacific American Leadership Foundation (August 15, 2017)	Jul17-Sep17

COMMUNITY	Asian-American Resource Center (August 23, 2017)	Jul17-Sep17
COMMUNITY	Audri Curtis (September 18, 2017)	Jul17-Sep17
COMMUNITY	Barbara Felburg-Jackson (September 13, 2017)	Jul17-Sep17
COMMUNITY	Barbara McGinty (September 18, 2017)	Jul17-Sep17
COMMUNITY	Barry R. Sedlik (September 15, 2017)	Jul17-Sep17
COMMUNITY	Becky Lopez (September 11, 2017)	Jul17-Sep17
COMMUNITY	Ben Ong (September 5, 2017)	Jul17-Sep17
COMMUNITY	Benjamin Acosta (September 12, 2017)	Jul17-Sep17
COMMUNITY	Billy Thompson (September 18, 2017)	Jul17-Sep17
COMMUNITY	Brian Lawler (September 18, 2017)	Jul17-Sep17
COMMUNITY	Brian McGinnis (September 5, 2017)	Jul17-Sep17
COMMUNITY	Brian Yanity (September 17, 2017)	Jul17-Sep17
COMMUNITY	Carey Olmscheid (September 12, 2017)	Jul17-Sep17
COMMUNITY	Carl A. Olson (September 18, 2017)	Jul17-Sep17
COMMUNITY	Carlos Marin (September 18, 2017)	Jul17-Sep17
COMMUNITY	Carly Iuffredo (September 7, 2017)	Jul17-Sep17
COMMUNITY	Carmel Gold-Fanning (September 18, 2017)	Jul17-Sep17
COMMUNITY	Carole Grover (August 29, 2017)	Jul17-Sep17
COMMUNITY	Carole Schindler Grover (August 30, 2017)	Jul17-Sep17
COMMUNITY	Celso Barcena (September 13, 2017)	Jul17-Sep17
COMMUNITY	Central San Pedro Neighborhood Council (September 18, 2017)	Jul17-Sep17
COMMUNITY	Charlotte Castillo (August 28, 2017)	Jul17-Sep17
COMMUNITY	Chelsea Ruiz (September 18, 2017)	Jul17-Sep17
COMMUNITY	Chengcheng Qian (August 30, 2017)	Jul17-Sep17
COMMUNITY	Christina Hall (September 12, 2017)	Jul17-Sep17
COMMUNITY	Christina Irving (August 30, 2017)	Jul17-Sep17
COMMUNITY	Christophe Dupin de Saint Cyr (August 28, 2017)	Jul17-Sep17
COMMUNITY	Christopher Beeler (September 18, 2017)	Jul17-Sep17
COMMUNITY	Cindy Koch (August 31, 2017)	Jul17-Sep17
COMMUNITY	Cindy Schmitz (September 18, 2017)	Jul17-Sep17
COMMUNITY	City of Carson (August 15, 2017)	Jul17-Sep17
COMMUNITY	City of Carson (September 18, 2017)	Jul17-Sep17
COMMUNITY	Claudia Duenas (September 18, 2017)	Jul17-Sep17
COMMUNITY	Claudia Padilla (September 18, 2017)	Jul17-Sep17
COMMUNITY	Clay Sandidge (September 11, 2017)	Jul17-Sep17
COMMUNITY	Coastal San Pedro Neighborhood Council (September 14, 2017)	Jul17-Sep17
COMMUNITY	Corey Dominguez (September 16, 2017)	Jul17-Sep17
COMMUNITY	Curtis Boyer (September 13, 2017)	Jul17-Sep17
COMMUNITY	Cynthia Mann (August 28, 2017)	Jul17-Sep17
COMMUNITY	Cynthia McCoy (September 18, 2017)	Jul17-Sep17
COMMUNITY	Cynthia Strachan (September 11, 2017)	Jul17-Sep17
COMMUNITY	Dagoberto Larios (September 8, 2017)	Jul17-Sep17
COMMUNITY	Daisy Pacheco (September 11, 2017)	Jul17-Sep17
COMMUNITY	Dale Dixon (September 18, 2017)	Jul17-Sep17
COMMUNITY	Dan Mulherin (September 8, 2017)	Jul17-Sep17
COMMUNITY	Dania Oliva-Pena (September 11, 2017)	Jul17-Sep17
COMMUNITY	Darin Manser (September 11, 2017)	Jul17-Sep17
COMMUNITY	Darko Blazic (August 30, 2017)	Jul17-Sep17
COMMUNITY	Dave Cortez (September 16, 2017)	Jul17-Sep17
COMMUNITY	Dave Schroeder (September 7, 2017)	Jul17-Sep17
COMMUNITY	David Garcia (September 10, 2017)	Jul17-Sep17
COMMUNITY	Dean Krivicic (September 14, 2017)	Jul17-Sep17
COMMUNITY	Debre Shelton (September 18, 2017)	Jul17-Sep17
COMMUNITY	Denise Lyn (September 18, 2017)	Jul17-Sep17
COMMUNITY	Denise Skeeter (September 13, 2017)	Jul17-Sep17
COMMUNITY	Dennis Munoz (September 11, 2017)	Jul17-Sep17
COMMUNITY	Devin O'Brien (August 28, 2017)	Jul17-Sep17
COMMUNITY	Diana Martinez (September 14, 2017)	Jul17-Sep17
COMMUNITY	Diana Munster (September 16, 2017)	Jul17-Sep17
COMMUNITY	Diane Aponte (September 18, 2017)	Jul17-Sep17
COMMUNITY	Diane Harper (September 18, 2017)	Jul17-Sep17

COMMUNITY	Diane Sablan (September 18, 2017)	Jul17-Sep17
COMMUNITY	Dinara Cramer (September 13, 2017)	Jul17-Sep17
COMMUNITY	Donald True (September 18, 2017)	Jul17-Sep17
COMMUNITY	Drake Trethaway (September 18, 2017)	Jul17-Sep17
COMMUNITY	Duane Ford (September 14, 2017)	Jul17-Sep17
COMMUNITY	Eddie Villa (September 8, 2017)	Jul17-Sep17
COMMUNITY	Edgar Hernandez Bringas (September 18, 2017)	Jul17-Sep17
COMMUNITY	Edgar Zweiback (September 8, 2017)	Jul17-Sep17
COMMUNITY	Eduardo Quintero (September 8, 2017)	Jul17-Sep17
COMMUNITY	Eduardo Quintero (September 9, 2017)	Jul17-Sep17
COMMUNITY	Eduardo Raya (September 12, 2017)	Jul17-Sep17
COMMUNITY	Eduardo Serrano (September 18, 2017)	Jul17-Sep17
COMMUNITY	Edward Holguin (September 18, 2017)	Jul17-Sep17
COMMUNITY	Edward Raya (September 13, 2017)	Jul17-Sep17
COMMUNITY	Eladio Estrada (August 30, 2017)	Jul17-Sep17
COMMUNITY	Emily Pitts (September 18, 2017)	Jul17-Sep17
COMMUNITY	Enrique Cardiel (September 11, 2017)	Jul17-Sep17
COMMUNITY	Enrique Yanez (September 13, 2017)	Jul17-Sep17
COMMUNITY	Erica Parra (September 18, 2017)	Jul17-Sep17
COMMUNITY	Erick Moran (September 6, 2017)	Jul17-Sep17
COMMUNITY	Erick Parada (September 18, 2017)	Jul17-Sep17
COMMUNITY	Eriverto Espinoza (September 8, 2017)	Jul17-Sep17
COMMUNITY	Esmeralda Hernandez (September 18, 2017)	Jul17-Sep17
COMMUNITY	Faith Leibowitz (September 13, 2017)	Jul17-Sep17
COMMUNITY	Felipe Guliman, Jr. (September 16, 2017)	Jul17-Sep17
COMMUNITY	Fernando Cardenas (September 7, 2017)	Jul17-Sep17
COMMUNITY	Fran Bates (September 13, 2017)	Jul17-Sep17
COMMUNITY	Francisco Reyna (September 8, 2017)	Jul17-Sep17
COMMUNITY	Gabrielle James (September 7, 2017)	Jul17-Sep17
COMMUNITY	George Bioletto (September 13, 2017)	Jul17-Sep17
COMMUNITY	George Chalmers (September 6, 2017)	Jul17-Sep17
COMMUNITY	Gil Patlan (September 8, 2017)	Jul17-Sep17
COMMUNITY	Gligor Gucev (September 8, 2017)	Jul17-Sep17
COMMUNITY	Grant Hudson (September 18, 2017)	Jul17-Sep17
COMMUNITY	Greg & Sandra Ortega Torres (September 16, 2017)	Jul17-Sep17
COMMUNITY	Hannah Jenkins (September 7, 2017)	Jul17-Sep17
COMMUNITY	Harry Helman (September 14, 2017)	Jul17-Sep17
COMMUNITY	Hatim Osman (September 18, 2017)	Jul17-Sep17
COMMUNITY	Herendira Razcon (September 8, 2017)	Jul17-Sep17
COMMUNITY	Holly Stacey (September 18, 2017)	Jul17-Sep17
COMMUNITY	Holy Heng (September 18, 2017)	Jul17-Sep17
COMMUNITY	Hugo Rivera (September 11, 2017)	Jul17-Sep17
COMMUNITY	Hugo Silva (September 18, 2017)	Jul17-Sep17
COMMUNITY	Huy Le (August 21, 2017)	Jul17-Sep17
COMMUNITY	Irene McKenna (September 8, 2017)	Jul17-Sep17
COMMUNITY	Isaac Wollman (August 31, 2017)	Jul17-Sep17
COMMUNITY	Isabella Centofanti (September 7, 2017)	Jul17-Sep17
COMMUNITY	Jane Williams (September 17, 2017)	Jul17-Sep17
COMMUNITY	Janet Gunter (September 18, 2017)	Jul17-Sep17
COMMUNITY	Jarold Healey (September 16, 2017)	Jul17-Sep17
COMMUNITY	Jason Gutierrez (August 23, 2017)	Jul17-Sep17
COMMUNITY	Jason Takaki (August 26, 2017)	Jul17-Sep17
COMMUNITY	Jason Takaki (August 28, 2017)	Jul17-Sep17
COMMUNITY	Jay Cheng (September 9, 2017)	Jul17-Sep17
COMMUNITY	Jean Molina (September 8, 2017)	Jul17-Sep17
COMMUNITY	Jeannette Sumner (September 18, 2017)	Jul17-Sep17
COMMUNITY	Jenny Penny (September 11, 2017)	Jul17-Sep17
COMMUNITY	Jeronimo Reyes (September 6, 2017)	Jul17-Sep17
COMMUNITY	Jeronimo Reyes (September 7, 2017)	Jul17-Sep17
COMMUNITY	Jesee Melendez (September 18, 2017)	Jul17-Sep17
COMMUNITY	Jessica Andrade (August 23, 2017)	Jul17-Sep17

COMMUNITY	Jessica Andrade (August 24, 2017)	Jul17-Sep17
COMMUNITY	Jessica Annand (September 18, 2017)	Jul17-Sep17
COMMUNITY	Jessica Vee (September 18, 2017)	Jul17-Sep17
COMMUNITY	Jesus Cano (September 11, 2017)	Jul17-Sep17
COMMUNITY	Jillian Gallery (September 13, 2017)	Jul17-Sep17
COMMUNITY	Jimmie Bates (September 18, 2017)	Jul17-Sep17
COMMUNITY	Jo Thompson (September 16, 2017)	Jul17-Sep17
COMMUNITY	John Bradford (August 28, 2017)	Jul17-Sep17
COMMUNITY	John Graf (September 5, 2017)	Jul17-Sep17
COMMUNITY	John Pagan (September 18, 2017)	Jul17-Sep17
COMMUNITY	John Smith (August 28, 2017)	Jul17-Sep17
COMMUNITY	John Stevens (September 18, 2017)	Jul17-Sep17
COMMUNITY	Jolie Gregory (September 18, 2017)	Jul17-Sep17
COMMUNITY	Jon Jensen (September 13, 2017)	Jul17-Sep17
COMMUNITY	Jorge Garcia (August 30, 2017)	Jul17-Sep17
COMMUNITY	Jose Garay (September 18, 2017)	Jul17-Sep17
COMMUNITY	Jose Rodriguez (September 13, 2017)	Jul17-Sep17
COMMUNITY	Jose Ruiz Mijares (September 18, 2017)	Jul17-Sep17
COMMUNITY	Joseph Fesili (September 13, 2017)	Jul17-Sep17
COMMUNITY	Joseph Horta (September 8, 2017)	Jul17-Sep17
COMMUNITY	Joseph Landau (August 22, 2017)	Jul17-Sep17
COMMUNITY	Joseph Mueller (August 23, 2017)	Jul17-Sep17
COMMUNITY	Josie Bojorquez (September 7, 2017)	Jul17-Sep17
COMMUNITY	Juan Guerrero (September 13, 2017)	Jul17-Sep17
COMMUNITY	Juan Martinez (September 18, 2017)	Jul17-Sep17
COMMUNITY	Judy Caroline (September 13, 2017)	Jul17-Sep17
COMMUNITY	Julie Coyro (September 11, 2017)	Jul17-Sep17
COMMUNITY	Juliette Carrillo (August 28, 2017)	Jul17-Sep17
COMMUNITY	Julio Paiz (September 18, 2017)	Jul17-Sep17
COMMUNITY	June Smith (September 8, 2017)	Jul17-Sep17
COMMUNITY	Karen Hemperly (September 18, 2017)	Jul17-Sep17
COMMUNITY	Karen Tipich-Bleiman (September 12, 2017)	Jul17-Sep17
COMMUNITY	Karina Acevedo (September 18, 2017)	Jul17-Sep17
COMMUNITY	Kathleen Leon (September 11, 2017)	Jul17-Sep17
COMMUNITY	Kathy (September 18, 2017)	Jul17-Sep17
COMMUNITY	Katie Spahn (September 16, 2017)	Jul17-Sep17
COMMUNITY	Katrina Harding (August 24, 2017)	Jul17-Sep17
COMMUNITY	Kavin Kanjanawijit (September 18, 2017)	Jul17-Sep17
COMMUNITY	Kenneth Socha (September 1, 2017)	Jul17-Sep17
COMMUNITY	Kirstin Wagner (September 5, 2017)	Jul17-Sep17
COMMUNITY	Kurtis Jay (September 18, 2017)	Jul17-Sep17
COMMUNITY	Laura Guzman (September 18, 2017)	Jul17-Sep17
COMMUNITY	Laura Sanborn (August 30, 2017)	Jul17-Sep17
COMMUNITY	Lee Fukui (August 31, 2017)	Jul17-Sep17
COMMUNITY	Lee Ginter (September 11, 2017)	Jul17-Sep17
COMMUNITY	Leo B. (September 12, 2017)	Jul17-Sep17
COMMUNITY	Letty Gonzalez (September 11, 2017)	Jul17-Sep17
COMMUNITY	Lidiana Portales Bliar (August 30, 2017)	Jul17-Sep17
COMMUNITY	Lilian Choy (September 14, 2017)	Jul17-Sep17
COMMUNITY	Lillian Santizo (September 12, 2017)	Jul17-Sep17
COMMUNITY	Lilly Krivicic (September 18, 2017)	Jul17-Sep17
COMMUNITY	Linda Bassett (September 7, 2017)	Jul17-Sep17
COMMUNITY	Linda Klein (September 18, 2017)	Jul17-Sep17
COMMUNITY	Linda Teach (September 7, 2017)	Jul17-Sep17
COMMUNITY	Lisa Bre (September 18, 2017)	Jul17-Sep17
COMMUNITY	Liz Reyes (September 18, 2017)	Jul17-Sep17
COMMUNITY	Lorens Salgado (September 13, 2017)	Jul17-Sep17
COMMUNITY	Lou Schumow (September 18, 2017)	Jul17-Sep17
COMMUNITY	Lucille Atillo (September 11, 2017)	Jul17-Sep17
COMMUNITY	M. Apodaca (September 18, 2017)	Jul17-Sep17
COMMUNITY	Maati Auset (September 11, 2017)	Jul17-Sep17

COMMUNITY	Malila Hollow (September 13, 2017)	Jul17-Sep17
COMMUNITY	Marcela Vazquez (September 8, 2017)	Jul17-Sep17
COMMUNITY	Marco Valenzuela (September 11, 2017)	Jul17-Sep17
COMMUNITY	Maribel Alejandre (August 30, 2017)	Jul17-Sep17
COMMUNITY	Maricella Cardona (August 28, 2017)	Jul17-Sep17
COMMUNITY	Mario Cruz (September 18, 2017)	Jul17-Sep17
COMMUNITY	Mark Friedman (August 30, 2017)	Jul17-Sep17
COMMUNITY	Marlene Dermer (August 30, 2017)	Jul17-Sep17
COMMUNITY	Martha Contreras (September 11, 2017)	Jul17-Sep17
COMMUNITY	Martha Munoz (September 18, 2017)	Jul17-Sep17
COMMUNITY	Marya Mazor (September 18, 2017)	Jul17-Sep17
COMMUNITY	Matt Sersion (September 8, 2017)	Jul17-Sep17
COMMUNITY	Matthew Palmer (September 7, 2017)	Jul17-Sep17
COMMUNITY	Mel Walls (September 18, 2017)	Jul17-Sep17
COMMUNITY	Melissa Parra (September 7, 2017)	Jul17-Sep17
COMMUNITY	Michael Busman (August 25, 2017)	Jul17-Sep17
COMMUNITY	Michael Martinovich (September 18, 2017)	Jul17-Sep17
COMMUNITY	Michael T. Wollman (August 31, 2017)	Jul17-Sep17
COMMUNITY	Michele Swanson (September 18, 2017)	Jul17-Sep17
COMMUNITY	Mike Castillo (September 8, 2017)	Jul17-Sep17
COMMUNITY	Mireya Pachecano (September 11, 2017)	Jul17-Sep17
COMMUNITY	Moff Kyle (September 18, 2017)	Jul17-Sep17
COMMUNITY	Moises Mora (September 11, 2017)	Jul17-Sep17
COMMUNITY	Monique McCollam (August 28, 2017)	Jul17-Sep17
COMMUNITY	Moses Carl (September 18, 2017)	Jul17-Sep17
COMMUNITY	Myrna Myles (September 18, 2017)	Jul17-Sep17
COMMUNITY	Nader Ghassemilou (September 11, 2017)	Jul17-Sep17
COMMUNITY	Nadia McCaffrey (September 18, 2017)	Jul17-Sep17
COMMUNITY	Natascha Runge (September 16, 2017)	Jul17-Sep17
COMMUNITY	Nelda Ann Ritchey (September 18, 2017)	Jul17-Sep17
COMMUNITY	Nicolas Gonzalez (September 13, 2017)	Jul17-Sep17
COMMUNITY	Noel Park (September 18, 2017)	Jul17-Sep17
COMMUNITY	Northwest San Pedro Neighborhood Council (September 18, 2017)	Jul17-Sep17
COMMUNITY	Ofelia Medina (August 21, 2017)	Jul17-Sep17
COMMUNITY	Ofelia Romero (September 11, 2017)	Jul17-Sep17
COMMUNITY	Osvany-Alejandra Cepero (September 18, 2017)	Jul17-Sep17
COMMUNITY	Pamela Mauricio (September 18, 2017)	Jul17-Sep17
COMMUNITY	Pamela Salyer (September 8, 2017)	Jul17-Sep17
COMMUNITY	Patricia Clark (September 18, 2017)	Jul17-Sep17
COMMUNITY	Patricia Gomez (September 13, 2017)	Jul17-Sep17
COMMUNITY	Patricia Krause (September 7, 2017)	Jul17-Sep17
COMMUNITY	Patricia Veal (September 7, 2017)	Jul17-Sep17
COMMUNITY	Patty Friedman (September 18, 2017)	Jul17-Sep17
COMMUNITY	Paul Alexander (September 7, 2017)	Jul17-Sep17
COMMUNITY	Pedro Diaz (September 7, 2017)	Jul17-Sep17
COMMUNITY	Pedro Diaz (September 7, 2017)	Jul17-Sep17
COMMUNITY	Peter Addis (September 18, 2017)	Jul17-Sep17
COMMUNITY	Peter Schissler (September 13, 2017)	Jul17-Sep17
COMMUNITY	PTGJR (September 15, 2017)	Jul17-Sep17
COMMUNITY	R. Hicks (July 19, 2017)	Jul17-Sep17
COMMUNITY	Rafael Renteria (August 22, 2017)	Jul17-Sep17
COMMUNITY	Ralph Picasso (September 18, 2017)	Jul17-Sep17
COMMUNITY	Rana Jamil (September 18, 2017)	Jul17-Sep17
COMMUNITY	Raye Murphy (September 13, 2017)	Jul17-Sep17
COMMUNITY	Raymundo Frank Fuentes (September 8, 2017)	Jul17-Sep17
COMMUNITY	Rebecca Coleman (August 28, 2017)	Jul17-Sep17
COMMUNITY	Rebecca Rosenberg (September 18, 2017)	Jul17-Sep17
COMMUNITY	Renee Figueira (September 5, 2017)	Jul17-Sep17
COMMUNITY	Richard Goodman (September 18, 2017)	Jul17-Sep17
COMMUNITY	Richard Havenick (September 13, 2017)	Jul17-Sep17
COMMUNITY	Richard Hopkins (August 24, 2017)	Jul17-Sep17

COMMUNITY	Richard Smith (September 18, 2017)	Jul17-Sep17
COMMUNITY	Robert Brennan (August 26, 2017)	Jul17-Sep17
COMMUNITY	Robert Curtis (September 18, 2017)	Jul17-Sep17
COMMUNITY	Robert Cutts (September 18, 2017)	Jul17-Sep17
COMMUNITY	Robert Dale (September 13, 2017)	Jul17-Sep17
COMMUNITY	Roberto Anguamea (September 11, 2017)	Jul17-Sep17
COMMUNITY	Roberto Carneiro (August 28, 2017)	Jul17-Sep17
COMMUNITY	Rochelle Serna (August 28, 2017)	Jul17-Sep17
COMMUNITY	Roger Angle (September 11, 2017)	Jul17-Sep17
COMMUNITY	Roger Holman (September 14, 2017)	Jul17-Sep17
COMMUNITY	Roland Morel (September 18, 2017)	Jul17-Sep17
COMMUNITY	Ron Schweitzer Jr. (September 13, 2017)	Jul17-Sep17
COMMUNITY	Ryan Campbell (September 12, 2017)	Jul17-Sep17
COMMUNITY	Sabina Simsbury (September 16, 2017)	Jul17-Sep17
COMMUNITY	Salvador Navarro (September 13, 2017)	Jul17-Sep17
COMMUNITY	San Pedro Peninsula Homeowner's Coalition (September 18, 2017)	Jul17-Sep17
COMMUNITY	Sandra Osegueda (September 16, 2017)	Jul17-Sep17
COMMUNITY	Sandra Stanton (September 18, 2017)	Jul17-Sep17
COMMUNITY	Santos Trani (September 18, 2017)	Jul17-Sep17
COMMUNITY	Sara Qamar (September 18, 2017)	Jul17-Sep17
COMMUNITY	Sean Carroll (August 26, 2017)	Jul17-Sep17
COMMUNITY	Shakayla Thomas (September 18, 2017)	Jul17-Sep17
COMMUNITY	Shelia & Jeff Brakefield (September 18, 2017)	Jul17-Sep17
COMMUNITY	Sherryl Burns (September 18, 2017)	Jul17-Sep17
COMMUNITY	Star Galvan (September 18, 2017)	Jul17-Sep17
COMMUNITY	Stephanie Reed (September 11, 2017)	Jul17-Sep17
COMMUNITY	Steven Benavides (September 8, 2017)	Jul17-Sep17
COMMUNITY	Steven Cantu (September 18, 2017)	Jul17-Sep17
COMMUNITY	Sylver Vandeth (September 18, 2017)	Jul17-Sep17
COMMUNITY	Tallan Acalin (September 18, 2017)	Jul17-Sep17
COMMUNITY	Tallan Acalin (September 18, 2017)	Jul17-Sep17
COMMUNITY	Taylor Christian (September 18, 2017)	Jul17-Sep17
COMMUNITY	Tessa Alder (September 7, 2017)	Jul17-Sep17
COMMUNITY	The Salvadoran American Leadership & Educational Fund (August 21, 2017)	Jul17-Sep17
COMMUNITY	Theo Diaz (August 30, 2017)	Jul17-Sep17
COMMUNITY	Theresa Brown (September 18, 2017)	Jul17-Sep17
COMMUNITY	Thilo Kluth (September 11, 2017)	Jul17-Sep17
COMMUNITY	Thomas O'Brien (August 30, 2017)	Jul17-Sep17
COMMUNITY	Tiffany Jackson (September 18, 2017)	Jul17-Sep17
COMMUNITY	Tina Lopez (September 7, 2017)	Jul17-Sep17
COMMUNITY	Tony DiCiaccio (September 13, 2017)	Jul17-Sep17
COMMUNITY	Veronica Vang (September 11, 2017)	Jul17-Sep17
COMMUNITY	Vincent Chairez (September 11, 2017)	Jul17-Sep17
COMMUNITY	Virginia Dickey (September 11, 2017)	Jul17-Sep17
COMMUNITY	Walt Wenzel (September 18, 2017)	Jul17-Sep17
COMMUNITY	Warren Beaver (September 18, 2017)	Jul17-Sep17
COMMUNITY	Wendy Lemus (September 18, 2017)	Jul17-Sep17
COMMUNITY	William Brown (August 28, 2017)	Jul17-Sep17
COMMUNITY	William Fahey (September 1, 2017)	Jul17-Sep17
COMMUNITY	William Stapleton (September 13, 2017)	Jul17-Sep17
COMMUNITY	William Wandner (September 16, 2017)	Jul17-Sep17
COMMUNITY	Williams Reynolds (September 8, 2017)	Jul17-Sep17
COMMUNITY	Wynett Devencenzi (September 18, 2017)	Jul17-Sep17
COMMUNITY	Yao Suxian, 姚素嫻 (September 13, 2017)	Jul17-Sep17
COMMUNITY	Yvette Aguirre (September 11, 2017)	Jul17-Sep17
COMMUNITY	Yvonne Dina (September 11, 2017)	Jul17-Sep17
COMMUNITY	Zobeida Porter-Castillo (September 18, 2017)	Jul17-Sep17
COMMUNITY	Brian Yanity (February 10, 2017)	Nov16-Jun17
COMMUNITY	Central San Pedro Neighborhood Council (January 11, 2017)	Nov16-Jun17
COMMUNITY	City of Ontario et al (February 16, 2017)	Nov16-Jun17
COMMUNITY	City of Rancho Cucamonga (March 21, 2017)	Nov16-Jun17

COMMUNITY	Councilman Al Austin (February 13, 2017)	Nov16-Jun17
COMMUNITY	Duarte Chamber of Commerce (February 16, 2017)	Nov16-Jun17
COMMUNITY	Enrique Ponce (April 21, 2017)	Nov16-Jun17
COMMUNITY	Greater Riverside Chambers of Commerce (February 17, 2017)	Nov16-Jun17
COMMUNITY	Gwendolyn Harry (February 7, 2017)	Nov16-Jun17
COMMUNITY	Joan Levine (May 14, 2017)	Nov16-Jun17
COMMUNITY	Juan Alvarez (May 16, 2017)	Nov16-Jun17
COMMUNITY	M. Steven Moore (January 27, 2017)	Nov16-Jun17
COMMUNITY	Northwest San Pedro Neighborhood Council (February 15, 2017)	Nov16-Jun17
COMMUNITY	Ontario Chamber of Commerce (February 17, 2017)	Nov16-Jun17
COMMUNITY	Ron Loveridge (April 8, 2017)	Nov16-Jun17
COMMUNITY	San Pedro Neighborhood Council (January 6, 2017)	Nov16-Jun17
COMMUNITY	Sophia Song (February 14, 2017)	Nov16-Jun17
COMMUNITY	Charles Stevens (October 26, 2017)	Sep17-Nov17
COMMUNITY	Don Mitchell (October 6, 2017)	Sep17-Nov17
COMMUNITY	Ingrid Harris (October 24, 2017)	Sep17-Nov17
COMMUNITY	John Short (October 24, 2017)	Sep17-Nov17
COMMUNITY	Albert Matinao (September 21, 2017)	Sep17-Nov17
COMMUNITY	Alex Thomsen (October 25, 2017)	Sep17-Nov17
COMMUNITY	Andreas Tillmann (September 20, 2017)	Sep17-Nov17
COMMUNITY	Anne Wehner (October 24, 2017)	Sep17-Nov17
COMMUNITY	Brian Powers (October 24, 2017)	Sep17-Nov17
COMMUNITY	Camela Krebs (October 24, 2017)	Sep17-Nov17
COMMUNITY	Carlton Ding (October 24, 2017)	Sep17-Nov17
COMMUNITY	Christopher Ding (October 24, 2017)	Sep17-Nov17
COMMUNITY	Christopher Logan (October 27, 2017)	Sep17-Nov17
COMMUNITY	Claudia Baker (September 20, 2017)	Sep17-Nov17
COMMUNITY	Craig Plank (September 20, 2017)	Sep17-Nov17
COMMUNITY	Cynthia Sesso (September 19, 2017)	Sep17-Nov17
COMMUNITY	Daniel Wellner (October 25, 2017)	Sep17-Nov17
COMMUNITY	Denis Ding (October 24, 2017)	Sep17-Nov17
COMMUNITY	Dr. Julius J. Rim (October 30, 2017)	Sep17-Nov17
COMMUNITY	Dump Dirty Diesel Petition with Signature Pages (October 17, 2017)	Sep17-Nov17
COMMUNITY	Eddie Shepherd (September 19, 2017)	Sep17-Nov17
COMMUNITY	Elizabeth Nagaseu (September 19, 2017)	Sep17-Nov17
COMMUNITY	Emelia Torlai (October 24, 2017)	Sep17-Nov17
COMMUNITY	Fawna Kritzer (October 25, 2017)	Sep17-Nov17
COMMUNITY	Gala MacNeal (September 19, 2017)	Sep17-Nov17
COMMUNITY	Gary Jordan (October 25, 2017)	Sep17-Nov17
COMMUNITY	Gary Vazzana (October 31, 2017)	Sep17-Nov17
COMMUNITY	Gayle Row (October 26, 2017)	Sep17-Nov17
COMMUNITY	Hadar Feingold (September 19, 2017)	Sep17-Nov17
COMMUNITY	Harrison Clay (October 25, 2017)	Sep17-Nov17
COMMUNITY	James Harger (October 28, 2017)	Sep17-Nov17
COMMUNITY	Jason Johnston (October 27, 2017)	Sep17-Nov17
COMMUNITY	Jeanine Chu (October 24, 2017)	Sep17-Nov17
COMMUNITY	Jeffrey J Ricketts (October 24, 2017)	Sep17-Nov17
COMMUNITY	Jelena Rowe (October 25, 2017)	Sep17-Nov17
COMMUNITY	Jim Taylor (October 25, 2017)	Sep17-Nov17
COMMUNITY	Kevin Simpson (September 19, 2017)	Sep17-Nov17
COMMUNITY	Lily Nguyen (October 24, 2017)	Sep17-Nov17
COMMUNITY	Lindsay Harrison (October 30, 2017)	Sep17-Nov17
COMMUNITY	Lou Baglietto – Press Telegram (October 31, 2017)	Sep17-Nov17
COMMUNITY	Louise Fernandez (September 20, 2017)	Sep17-Nov17
COMMUNITY	Mark Darnell (September 19, 2017)	Sep17-Nov17
COMMUNITY	Mark Theissen (October 25, 2017)	Sep17-Nov17
COMMUNITY	Michael Etter (September 21, 2017)	Sep17-Nov17
COMMUNITY	Michael R. Busman (October 29, 2017)	Sep17-Nov17
COMMUNITY	Mike Morra (September 19, 2017)	Sep17-Nov17
COMMUNITY	Mike Plichta (September 19, 2017)	Sep17-Nov17
COMMUNITY	Mike Todaro (September 27, 2017)	Sep17-Nov17

COMMUNITY	Mitchell Pratt (October 27, 2017)	Sep17-Nov17
COMMUNITY	Mr. & Mrs. W. M. Parsch (October 25, 2017)	Sep17-Nov17
COMMUNITY	Neil Khadim (September 20, 2017)	Sep17-Nov17
COMMUNITY	Patricia Vazzana (October 31, 2017)	Sep17-Nov17
COMMUNITY	Poros2000 (September 20, 2017)	Sep17-Nov17
COMMUNITY	Reagan Clemens (October 27, 2017)	Sep17-Nov17
COMMUNITY	Robert Mroski (September 19, 2017)	Sep17-Nov17
COMMUNITY	Robert Silence (September 28, 2017)	Sep17-Nov17
COMMUNITY	Ross S. Heckmann (October 9, 2017)	Sep17-Nov17
COMMUNITY	Rskillsta (September 24, 2017)	Sep17-Nov17
COMMUNITY	Sahar Kamali (October 24, 2017)	Sep17-Nov17
COMMUNITY	Scott Vazzana (October 30, 2017)	Sep17-Nov17
COMMUNITY	Sheldon Schroeder (October 24, 2017)	Sep17-Nov17
COMMUNITY	Sisi Borj (September 19, 2017)	Sep17-Nov17
COMMUNITY	Staci Pratt (October 25, 2017)	Sep17-Nov17
COMMUNITY	Steve Aragon (September 20, 2017)	Sep17-Nov17
COMMUNITY	Tiana Chastain (September 20, 2017)	Sep17-Nov17
COMMUNITY	Tom Bressler (October 25, 2017)	Sep17-Nov17
COMMUNITY	Tony Kritzer (October 25, 2017)	Sep17-Nov17
COMMUNITY	Wayne Egner (September 19, 2017)	Sep17-Nov17
COMMUNITY	Will Flanagan (October 24, 2017)	Sep17-Nov17
ENVIRONMENT	Breath California of Los Angeles County (September 6, 2017)	Jul17-Sep17
ENVIRONMENT	Center for Latino Community Health (September 7, 2017)	Jul17-Sep17
ENVIRONMENT	Citizens Coalition of a Safe Community (September 18, 2017)	Jul17-Sep17
ENVIRONMENT	Coalition for A Safe Environment et al. (September 18, 2017)	Jul17-Sep17
ENVIRONMENT	Coalition for Clean Air (September 18, 2017)	Jul17-Sep17
ENVIRONMENT	Latino Coalition for A Healthy California (September 7, 2017)	Jul17-Sep17
ENVIRONMENT	Natural Resources Defense Council et al. (September 18, 2017)	Jul17-Sep17
ENVIRONMENT	Sierra Club Angeles Chapter Climate Change (September 18, 2017)	Jul17-Sep17
ENVIRONMENT	Sierra Club Angeles Chapter Transportation (September 18, 2017)	Jul17-Sep17
ENVIRONMENT	South Bay Los Angeles 350 (September 18, 2017)	Jul17-Sep17
ENVIRONMENT	Clean Energy et al. (November 16, 2016)	Nov16-Jun17
ENVIRONMENT	Coalition for a Safe Environment (February 17, 2017)	Nov16-Jun17
ENVIRONMENT	Earthjustice et al. (April 10, 2017)	Nov16-Jun17
ENVIRONMENT	Earthjustice et al. (January 24, 2017)	Nov16-Jun17
ENVIRONMENT	Earthjustice et al. (March 13, 2017)	Nov16-Jun17
ENVIRONMENT	Earthjustice et al. (November 17, 2016)	Nov16-Jun17
ENVIRONMENT	California Natural Gas Vehicle Coalition (October 26, 2017)	Sep17-Nov17
ENVIRONMENT	Coalition for Clean Air (October 30, 2017)	Sep17-Nov17
ENVIRONMENT	Energy Vision (October 26, 2017)	Sep17-Nov17
INDUSTRY	Agility Fuel Solutions (September 15, 2017)	Jul17-Sep17
INDUSTRY	Agriculture Transportation Coalition et al. (September 18, 2017)	Jul17-Sep17
INDUSTRY	American Trucking Associations et al. (September 14, 2017)	Jul17-Sep17
INDUSTRY	American Waterways Operators (September 18, 2017)	Jul17-Sep17
INDUSTRY	ANGTL/ANRTL (August 11, 2017)	Jul17-Sep17
INDUSTRY	Azusa Chamber of Commerce (August 31, 2017)	Jul17-Sep17
INDUSTRY	Bank of America Merrill Lynch (August 2, 2017)	Jul17-Sep17
INDUSTRY	BizFed et al. (September 15, 2017)	Jul17-Sep17
INDUSTRY	California Class 1 Railroads et al. (September 18, 2017)	Jul17-Sep17
INDUSTRY	California Natural Gas Vehicle Coalition (September 18, 2017)	Jul17-Sep17
INDUSTRY	Carmichael International Service (September 18, 2017)	Jul17-Sep17
INDUSTRY	Carrix – SSA Marine, Inc. (September 18, 2017)	Jul17-Sep17
INDUSTRY	Clean Energy Fuels (September 18, 2017)	Jul17-Sep17
INDUSTRY	Coalition for Responsible Transportation et al. (September 7, 2017)	Jul17-Sep17
INDUSTRY	Cummins Westport Inc. (September 15, 2017)	Jul17-Sep17
INDUSTRY	Daimler Trucks North America LLC (September 18, 2017)	Jul17-Sep17
INDUSTRY	Dairy Farmers of America (September 18, 2017)	Jul17-Sep17
INDUSTRY	Duncan & Sons Lines (September 14, 2017)	Jul17-Sep17
INDUSTRY	Evergreen Shipping Agency (America) Corporation (September 18, 2017)	Jul17-Sep17
INDUSTRY	Foreign Trade Association (September 18, 2017)	Jul17-Sep17
INDUSTRY	FuturePorts et al. (September 18, 2017)	Jul17-Sep17

INDUSTRY	Green Marine (September 18, 2017)	Jul17-Sep17
INDUSTRY	Harbor Association of Industry & Commerce (September 18, 2017)	Jul17-Sep17
INDUSTRY	Inland Kenworth – Carson & Inland Group (September 15, 2017)	Jul17-Sep17
INDUSTRY	Inland Kenworth (US), Inc (September 11, 2017)	Jul17-Sep17
INDUSTRY	International Brotherhood of Electrical Workers (September 15, 2017)	Jul17-Sep17
INDUSTRY	International Transportation Service, Inc. (September 18, 2017)	Jul17-Sep17
INDUSTRY	International Warehouse Logistics Association (September 13, 2017)	Jul17-Sep17
INDUSTRY	John McLaurin – Daily Breeze Guest Commentary (July 21, 2017)	Jul17-Sep17
INDUSTRY	Long Beach Area Chamber of Commerce (September 18, 2017)	Jul17-Sep17
INDUSTRY	Los Angeles Area Chamber of Commerce (September 15, 2017)	Jul17-Sep17
INDUSTRY	Los Angeles Gateway Chamber of Commerce (September 18, 2017)	Jul17-Sep17
INDUSTRY	Matson Navigation Company, Inc. (September 18, 2017)	Jul17-Sep17
INDUSTRY	Mitsubishi Cement Corporation (September 18, 2017)	Jul17-Sep17
INDUSTRY	Opterra Energy Services (September 11, 2017)	Jul17-Sep17
INDUSTRY	Pacific Enterprise Bank (July 28, 2017)	Jul17-Sep17
INDUSTRY	Pacific Enterprise Bank (September 15, 2017)	Jul17-Sep17
INDUSTRY	Pacific Merchant Shipping Association (PMSA) GHG Analysis (August 21, 2017)	Jul17-Sep17
INDUSTRY	PierPass (September 14, 2017)	Jul17-Sep17
INDUSTRY	PMSA (September 18, 2017)	Jul17-Sep17
INDUSTRY	PMSA on Draft CAAP Workshop (August 30, 2017)	Jul17-Sep17
INDUSTRY	PMSA West Coast Trade Report – Jock O’Connell (August 2017)	Jul17-Sep17
INDUSTRY	PMSA West Coast Trade Report – John McLaurin (August 2017)	Jul17-Sep17
INDUSTRY	Pomona Chamber of Commerce (September 13, 2017)	Jul17-Sep17
INDUSTRY	Ports America (September 18, 2017)	Jul17-Sep17
INDUSTRY	Quantum Fuel Systems (September 15, 2017)	Jul17-Sep17
INDUSTRY	Rush Enterprises (September 15, 2017)	Jul17-Sep17
INDUSTRY	SA Recycling (September 18, 2017)	Jul17-Sep17
INDUSTRY	Scott M. Jones (August 29, 2017)	Jul17-Sep17
INDUSTRY	SEA\LNG (September 18, 2017)	Jul17-Sep17
INDUSTRY	Shell North America LNG LLC (September 18, 2017)	Jul17-Sep17
INDUSTRY	Siemens eHighway Department (September 18, 2017)	Jul17-Sep17
INDUSTRY	SoCal Gas (September 18, 2017)	Jul17-Sep17
INDUSTRY	South Bay Association of Chambers of Commerce (September 18, 2017)	Jul17-Sep17
INDUSTRY	Southern California Edison (September 18, 2017)	Jul17-Sep17
INDUSTRY	Teamsters Port Division (September 18, 2017)	Jul17-Sep17
INDUSTRY	Tesla, Inc. (September 18, 2017)	Jul17-Sep17
INDUSTRY	The Coalition for Renewable Natural Gas (September 18, 2017)	Jul17-Sep17
INDUSTRY	Velocity Vehicle Group (September 18, 2017)	Jul17-Sep17
INDUSTRY	Wilmington Chamber of Commerce (September 18, 2017)	Jul17-Sep17
INDUSTRY	Yang Ming Group (September 15, 2017)	Jul17-Sep17
INDUSTRY	Yusen Terminals LLC (September 18, 2017)	Jul17-Sep17
INDUSTRY	American Power Group (February 7, 2017)	Nov16-Jun17
INDUSTRY	Atlas Marine (February 3, 2017)	Nov16-Jun17
INDUSTRY	Agility Fuel Solutions (February 17, 2017)	Nov16-Jun17
INDUSTRY	California Natural Gas Vehicle Coalition (February 1, 2017)	Nov16-Jun17
INDUSTRY	California Natural Gas Vehicle Coalition (February 21, 2017)	Nov16-Jun17
INDUSTRY	California Natural Gas Vehicle Coalition and The Coalition for Renewable Natural Gas (November 18, 2016)	Nov16-Jun17
INDUSTRY	Clean Energy (February 17, 2017)	Nov16-Jun17
INDUSTRY	Clean Energy (May 24, 2017)	Nov16-Jun17
INDUSTRY	Coalition for Clean Air (January 13, 2017)	Nov16-Jun17
INDUSTRY	Coalition for Renewable Natural Gas (February 17, 2017)	Nov16-Jun17
INDUSTRY	Cummins Westport (February 15, 2017)	Nov16-Jun17
INDUSTRY	Los Angeles County Business Federation (February 13, 2017)	Nov16-Jun17
INDUSTRY	Michael Mayor (December 22, 2016)	Nov16-Jun17
INDUSTRY	Michael Mayor, Mayor Logistics (March 31, 2017)	Nov16-Jun17
INDUSTRY	Pacific Merchant Shipping Association (January 30, 2017)	Nov16-Jun17
INDUSTRY	Pacific Merchant Shipping Association (March 3, 2017)	Nov16-Jun17
INDUSTRY	Shippers Transport Express (February 17, 2017)	Nov16-Jun17
INDUSTRY	Southern Counties Express (February 8, 2017)	Nov16-Jun17
INDUSTRY	Total Transportation Services, Inc. (February 13, 2017)	Nov16-Jun17

INDUSTRY	Barbara Johnson, Clean Energy Fuels (October 24, 2017)	Sep17-Nov17
INDUSTRY	Derik Turbide et al. (October 24, 2017)	Sep17-Nov17
INDUSTRY	Dyanna Peters, Clean Energy Fuels (October 24, 2017)	Sep17-Nov17
INDUSTRY	Jane Tran, Clean Energy Fuels (October 24, 2017)	Sep17-Nov17
INDUSTRY	John McLaurin, Pacific Merchant Shipping Association – Daily Breeze (October 12, 2017)	Sep17-Nov17
INDUSTRY	Lanette Maes, Clean Energy Fuels (October 25, 2017)	Sep17-Nov17
INDUSTRY	Ron Thompson, Clean Energy Fuels (October 25, 2017)	Sep17-Nov17
INDUSTRY	Warren Mitchell, Clean Energy Fuels (October 25, 2017)	Sep17-Nov17