



May 29, 2026

South Coast Air Quality Management District  
21865 Copley Dr.  
Diamond Bar, CA 91765

RE: CAAP Plus measures/Ports-AQMD Cooperative Agreement Addendum  
HTA Comments: Support for Immediate Implementation of the Drayage Truck Trip Utilization Program

To the South Coast Air Quality Management District,

On behalf of the Harbor Trucking Association and its members, we are writing to provide formal comments regarding the proposed expansion of the CAAP Plus measures. The Harbor Trucking Association (HTA) is a non-profit trade association representing motor carriers transporting marine containers to and from maritime ports on the United States West Coast (USWC). As the largest non-profit trade association exclusively representing harbor drayage carriers in the nation, we are committed to advocating for policies that support the operational and economic health of the drayage community.

We are submitting these comments in strong support of the Drayage Truck Trip Utilization incentive program as proposed in the Draft Proposed Addendum to Cooperative Agreement ver. 5-8-26. The HTA views this program as a "low-hanging fruit" initiative that provides immediate, quantifiable benefits to the industry. We offer the following counterpoints to ensure the program moves forward without administrative delay:

- Elimination of Unnecessary Red Tape: Adding longer comment periods to these draft guidelines creates unnecessary administrative hurdles for an incentive program that is ready for deployment.
- Rewarding Early Adopters: It is imperative that this program is implemented immediately to reward and assist the drayage motor carriers who have already taken the leap to adopt zero-emission technology.
- Technological Readiness: With the recent technological advancements and deployment of equipment like Tesla and Windrose trucks, the industry is positioned to scale operations now.
- Signaling Private Investment: Passage of this incentive program signals to privately funded charging infrastructure companies to continue developing much-needed sites throughout major freight corridors.
- Addressing Cost Disparity: Because the cost of operating zero-emission equipment is not on par with traditional diesel internal combustion engines, these utilization incentives are a mechanical necessity to encourage continued adoption.

The HTA remains committed to the goals of the Cooperative Agreement Among the South Coast Air Quality Management District, the City of Long Beach Harbor Department, and the City of Los Angeles Harbor Department. However, the transition to zero-emission technology depends on timely action. We urge the AQMD to avoid delays that could stall the momentum generated by private sector investments.

We appreciate your consideration of these comments.

Sincerely:

A handwritten signature in black ink, appearing to read 'Robert Loya', with a long horizontal stroke extending to the right.

Robert Loya  
CEO, Harbor Trucking Association  
[robert@harbortruckers.org](mailto:robert@harbortruckers.org)