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DR. Ralph APPY

December 6, 2007

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California Air Resources Board
1001 I Street
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**SUBJECT: PROPOSED REGULATION TO CONTROL EMISSIONS FROM
IN-USE ON-ROAD DIESEL FUELED HEAVE-DUTY
DRAYAGE TRUCKS AT PORTS AND INTERMODAL RAIL
FACILITIES**

Dear Air Resources Board Members:

Thank you for the opportunity to comment on the California Air Resources Board's Proposed Regulation to Control Emissions from In-Use On-Road Diesel Fueled Heavy-Duty Drayage Trucks at Ports and Intermodal Rail Yard Facilities (Port Truck Regulation). The Port fully supports the California Air Resources Board's effort to reduce emissions from the heavy-duty vehicle fleets that serve the California Ports. Heavy-duty vehicles are a major contributor of nitrogen oxides and diesel particulate matter, which contribute to an increase in health risk within the San Pedro Bay Ports and the South Coast Air Basin.

The Port commends your staff for the hard work and commitment to the development of this Regulation. CARB staff has taken the time to coordinate with the Ports of Los Angeles and Long Beach on a continual basis throughout the development process. The Port greatly appreciates the opportunity to be involved as the Port Truck Regulation directly affects the Port and its operations. As you know, the Ports of Los Angeles and Long Beach are developing a Clean Truck Program which accelerates turnover of trucks serving the two ports. CARB staff has worked closely with the Ports to develop the Clean Truck Program and Port Truck Regulation in concert and we hope to maintain this collaborative relationship as the Clean Truck Program further develops.

Additionally, we appreciate CARB's assurance that the Port Truck Regulation will not preempt the requirements of the Clean Truck Program and will not affect the Port's of Los Angeles and Long Beach ability to receive Proposition 1B Bond funding. This funding is an integral component to the success of the Clean Truck



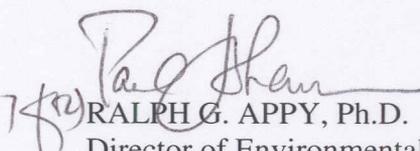
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Program, which is an important implementation mechanism for the Port Truck Regulation. We look forward to continued collaboration with your staff on the development, implementation, and synchronization of these Programs. The following are some issues that could potentially overlap between the Clean Truck Program and the Port Truck Regulation:

- Drayage Truck Registry. The Clean Truck Program would include a Drayage Truck Registry similar to the registry outlined in the Port Truck Regulation. In order to limit registration requirements, the Port requests that the Clean Truck Program Registry act as an alternative registration mechanism for trucks calling on the San Pedro Bay Ports.
- Enforcement. The Clean Truck Program intends to use technology such as Radio Frequency Identification (RFID) tags to verify compliance with Port requirements. The Port requests that this verification method act as an alternative verification method for the Port Truck Regulation.

Again, the Port of Los Angeles fully supports the adoption of the Port Truck Regulation and views this as a major step forward in reducing emissions from heavy-duty vehicles. We would like to thank you for the opportunity to provide comments on the Regulation. If you have any questions, please feel free to contact Kevin Maggay of my staff at (310) 732-3947.

Sincerely,


740) RALPH G. APPY, Ph.D.
Director of Environmental Management