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May 18, 2006

Mr. Mike Miguel
Program Assistance Section
California Air Resources Board
P.O. Box 2815
Sacramento, CA 95812

**SUBJECT: COMMENTS ON DRAFT EVALUATION OF PORT TRUCKS
AND POSSIBLE MITIGATION STRATEGIES**

Dear Mr. Miguel:

The Port of Los Angeles (Port) appreciates the opportunity to provide comments on the California Air Resources Board (CARB) Draft "Evaluation of Port Trucks and Possible Mitigation Strategies".

In general, Port staff agrees with the various aspects of the truck emissions reduction strategies. As you may know, the Port Clean Air Plan requires the reduction of diesel particulate matter (DPM) to the lowest achievable level. Port staff will strongly support such a strategy when compared against all other strategies. Our general comments are provided as follows. Detailed comments are provided in the attached table.

1. Funding is a critical component for a Port truck modernization program. The funding discussion in the report is not evaluated sufficiently. The report discusses potential funding sources; however hundreds of other local, regional, and State programs will be requesting funding from the same sources. The financial component should discuss current commitments and provide a realistic view of what can be secured for Port truck modernization.
2. The costs outlined in the report only reflect parts and installation. Additional costs such as program development and management, outreach and financial assistance should also be considered. Such cost may be in the thousands of dollars per truck.
3. One of the primary difficulties in modernizing the fleet serving the Ports is developing and implementing a program that would successfully upgrade the fleet. Although possible strategies are outlined, no real program or mechanism to implement a program is discussed.



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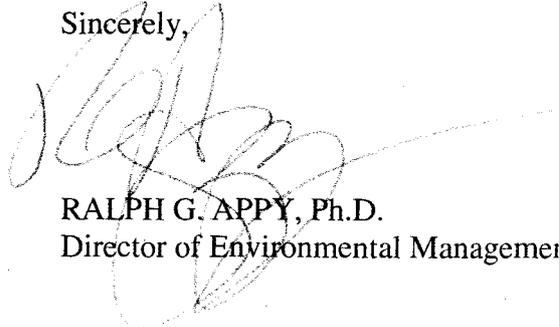
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4. Participation is another issue when considering a truck program. The report assumes that truck owners would willingly enter into these programs because money is there. In our experience with the Gateway Cities Program, we have found that major outreach efforts are required to achieve any kind of participation.
5. Please note that truck owners are required to report grant funding received as taxable income. Truck owners may have to pay \$5,000 to \$10,000 more in taxes during the year. This is a significant obstacle for truck owners whose profit margins do not increase with the purchase of a new truck.
6. A larger sample set of price listings must be evaluated. The cost of each strategy is based on the "10-year-old assumption" and the Price-Age Distribution Curve (Figure V-I), however only one price listing was used as a sample set for a 10 year old truck.
7. The cost of each strategy is based on the incremental cost of purchasing a newer than normal truck. For example, if a trucker is forced to purchase a six year old truck instead of a ten year old truck, the four year incremental cost is used. This methodology assumes that a truck driver is willing to purchase a truck in the first place. Truck drivers do not operate like fleets that turn over truck every set number of years. It is not known how many trucks an owner goes through throughout a career. Because of the low profit margins and rigorous nature of the work, truck operators may go through one truck their entire career before moving onto a different vocation.
8. The methodology used to estimate the number of trucks needs to be reconsidered. The report takes Caltrans I-710 vehicle counts and divides that number by 2, assuming each truck makes 2 trips per day (approximately 10,000 trucks). There are many trucks that call on the Port once a month or even less frequently, while others do not travel on the freeways. The 2005 Port Emissions Inventory, although not yet complete is estimating that there may be up to 45,000 trucks serving the Ports of Los Angeles and Long Beach.

Thank you for the opportunity to provide comments on the cold-ironing study. Please feel free to contact Kevin Maggay of my staff at (310) 732-3947, should you need further assistance.

Sincerely,



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

ATTACHMENT

Page	Comments
P V	Report states that the fleet serving the Ports is approximately 12,000. The Port of LA emissions Inventory 2005, although not complete at this time, show that that number may be as high as 45,000. Some call the Ports several times a day while others may call once a month or every few months
P IV	In 2002 ARB Staff estimates that approximately 72% of port trucks are model year 1993 or older. Where did ARB get this information?
P 6	The methodology used to estimate the number of trucks in the Port fleet has flaws. This methodology does not properly consider long haul trips and non-freeway trips. ARB methodology assumes that one truck makes 2 trips per day and therefore makes 6 trips in the span of 3 days. Long haul trips only visit once every couple of days therefore make one trip in a 3 day span. There are 5 trips (perhaps 2-3 trucks) unaccounted for. Non-freeway trips include local hauls. These do not go on the freeway and are therefore unaccounted for.
P 8	Page 8 of the report states: "The most common vehicle configuration is that of a tractor and trailer totaling five axles. A characteristic of many ports trucks is that the trucks are configured with sleeper cabs." Ports' staff would like to know how ARB came to this conclusion. In addition, ARB staff assumed that majority of the trucks servicing the Ports are short haul vehicles. This seems contradictory. If correct, however, the presence of sleeper trucks at the Ports may suggest that these are high mileage, used vehicles. This assumption should be verified. In their preliminary survey, Ports' staff found that 30% of all trucks visit once a month or less. These trucks could be sleepers that travel longer distances.
P 9	ARB assumes that because of the predominance of sleeper cabs in Port service, haul trucks are widely available. Sleeper cabs cost significantly more than non sleeper cabs. When given a chance, trucks owners would opt for the cheaper non sleeper cab versions. Therefore the predominance of sleeper cabs reflects the lack of availability of non sleeper cabs.
P 12	The Gateway Cities Program has replaced over 250 trucks to date.
P 12	Net refers to pay after taxes. Gross refers to pay pre-tax.
P 16	Caltrans uses Caline.
P 17	Please use caution when discussing cancer risk. At some points the report refers to the risk as "cases". Clarify that an HRA does not calculate number of cancer cases. By definition, an HRA estimates the <i>expected</i> number of people to develop cancer assuming <i>constant exposure over 70 years</i> . Also, isopleths would better depict this data than Figure II-3 does.
P 28	The discussion of the LNG Direct Injection engine is dismissed too easily. Class 8 400 hp LNG haul trucks are currently available.
P 33	The first paragraph explains that truckers would be forced to purchase trucks 6 model years before they would normally purchase them (purchasing a 2003 instead of a 1997 in 2007). The last paragraph discusses the price difference of buying a 6 year old truck and a 10 year old truck. This is based on purchasing a 2003 in 2009 instead of a 1999 - only a 4 model year difference. In 2007, no pre 2003 will be allowed in port service. The report should use the following formula: 4 year old MY truck - 10 year old MY truck.
P 36	ARB estimates that the cost of replacing a 10 year old truck is \$16,000. How did ARB get that number?
P 39	Pre-1994 trucks DPF cannot be retrofitted with DPFs.

P 40	Reports states that drivers may sell their old trucks. Agencies providing funding would likely require that old trucks not be used in the basin after a replacement is awarded. How can te trucker sell their trucks out of the basin without a significant effort to go out of the basin to sell it.
P 48	One finding solution provided is container fees. Who pays container fee? Again trucker operate on small profit margins and a container fee would be difficult to pay for.
P 48	Second paragraph should include the Port of Los Angeles.
P 48	Does this table take into account the Ports' future on dock intermodal facilities?
P 52	When discussing trucker's profit margins, report must also consider that any grant funding awarded will be considered taxable income on which they will have to pay taxes.
P 53	To assume that terminals and dispatch companies would have to increase pay scales is unsubstantiated.
P 53	Bullet 3. If performance standards are set for port trucks, will funding be allowed?
P 54	Making truckers sign binding agreements with the Ports would detract people from entering and/or staying in the industry. One of the draws of the industry is that truckers can work when they want and leave the business when they want.
	Strategies 1 and 3 described in the document require the replacement of 1993 and older model year trucks with 1998 and newer vehicles equipped with diesel particulate filters (DPFs). The latest draft version of the heavy-duty diesel truck emission factor analysis shared by the CARB staff with the Ports show NOx and PM emission factors for the 1998-2002 model year groups higher than those of the 1994 to 1997 model year group.
	A recent study performed by the Ports shows that not all trucks that servicing the ports visit every day. Only 13% of all trucks visit the ports one or more times per day. ARB staff should factor the impact of this fact into their proposed emissions reduction strategy.
	No details are provided to assist the reader in understanding how the vehicle miles of travel (VMT) for calendar years 2005, 2010 and 2015 as shown on page A-3 in table 3 entitled Ports Truck VMT was estimated. In addition, an explanation is needed as to why VMT would decreases by 9% between 2005 and 2010 and then increases by 14% between 2010, 2015 and 2020.
	The composite emission rates shown in Table 4 on page A-4, for model year group 1994-2002 need to be broken down into two separate model year groups: 1994 to1997 and 1998 to 2002 in order to assess the various vehicle replacement scenarios.
	We request that an updated version of this report be provided which includes a table of zero mile emission rates and deterioration rates by model year for heavy-duty diesel trucks.
	ARB staff's assumption that all trucks that visit to the ports have similar use characteristics should be substantiated..
	It is not clear if ARB staff have adjusted the composite emission rates for speed profiles that may be different for trucks traveling on Ports' property and nearby.
	Please explain how the 2005 Port fleet distribution was calculated. 120 MY 2003-2006 trucks seems high considering these are 1-2 year old trucks as of 2005. 1-2 year old trucks very rarely operate in the Port.
	Requiring trucks entering port service to meet 2003 standards in 2006 would cause major strain on the industry. Requiring new drivers to purchase only 3 year old trucks maximum may deter drivers from entering port service. A shortage of drivers may result in insufficient good movement. This may also be a concern in 2012 when drivers can only enter port service with 5 year old trucks. This especially crucial as the report anticipates an increase in needed fleet size.

	<p>You mention that having/acquiring capital for truck improvements is an issue. The actual issue actually lies in that drivers operate with very low profit margins and even with a loan program it would be very difficult for drivers to come up with the money to repay the loans. A \$9,000 loan for a DPF would be an additional couple of hundred dollars per month. At the profit margin truckers operate, it would be a major financial strain.</p>
	<p>Figure V-1 is not an accurate representation of truck costs. The report is based on a "10 year old truck assumption" however, the data in the graph for 10 year old trucks is based on the list price of one truck. (Another truck was eliminated because it was a sleepercab) Since the report is based on this 10 year assumption, a larger sample set of list prices should be evaluated.</p>
	<p>The report states that the average cost differential to purchase a 2007 MY over a 2002-2004 MY is \$28,000. How did ARB come up with this number?</p>
	<p>Much of the report is based on having performance standards for new entries into the port fleet. There is currently no initiation program for truckers to enter the port therefore there is no regulating body on port trucks that would inspect trucks before they enter the port fleet.</p>
	<p>Replacing all of the trucks in port service, although cost neutral, would assume that all of the trucker would purchase new trucks. Truckers may fully own their current truck and do not want to add a truck payment onto their small profit margins.</p>