



# PORT OF OAKLAND

May 23, 2006

Mr. Michael Miguel  
Manager, Project Support Section  
California Air Resources Board  
P.O. Box 2815  
Sacramento, CA 95812

Dear Mr. Miguel,

Thank you for providing the opportunity to comment on the preliminary draft Evaluation of Port Trucks and Possible Mitigation Strategies dated April 2006. We truly appreciate the hard work you and CARB staff have put into this report to address the issue. We are in agreement that trucks moving cargo in and out of California ports are in a unique sector, and they need to be addressed independently from the rest of the trucking industry. A blanket heavy-duty truck regulation covering all trucks operating in California would only exacerbate the shortage of available truckers necessary to haul cargo around our ports and railyards.

Staff at the Port of Oakland have carefully read the report, and have the following recommendations for improving the report and for further CARB studies on this issue.

#### Emissions Calculations for Port Trucks

CARB staff should conduct additional analysis on the emissions from port trucks. The VMT assumptions for trucks are extremely vague, and don't address the key differences between operations at the Ports of Los Angeles/Long Beach (POLA/POLB) and Oakland. The average distances traveled between the Ports and local distribution points and railyards are clearly different between Los Angeles/Long Beach and Oakland. Also, there are key differences between operations at the POLA/POLB and Oakland. Trucks serving the Los Angeles/Long Beach area typically operate 24 hours a day/ 7 days a week, whereas trucks serving Oakland operate on a more traditional 8-hour shift/ 5 days a week. A more detailed analysis will yield a more accurate representation of emissions for trucks serving each port.

#### Cost-Effectiveness Calculations

The cost-effectiveness calculations used to determine feasibility of the proposed strategies are distinctly different from CARB's established criteria from the Carl Moyer Program. Discount rate, capital recovery periods, and emissions weighting criteria are completely different from the Moyer Program. A recalculation of the cost-effectiveness in accordance to the existing criteria would be beneficial in determining which emission-reduction strategies will be most cost-effective to implement.

#### Port Trucks and Economics

It is important to note that port truck drivers are typically paid a pre-determined amount per container or load delivered, and increasing costs for fuel and other fees decrease the overall pre-tax net earnings. Also, the shipping industry is seasonal, with the highest volume of goods moved between June and November. Many drivers are extremely busy

moving loads during the peak season, but they may only be working once or twice a week during the slower times of the year.

#### Program Enforcement

The enforcement of program strategies at the ports through the terminal operators is an unrealistic scenario. Given that the terminals operators are already focused on business and security-related issues such as scanning cargo and identifying drivers entering and exiting their gates, it is unlikely that trucks will be turned away for failure to comply with air quality regulations. Terminal staff in charge of checking in trucks and containers do not have the expertise to differentiate between acceptable and non-acceptable trucks. An alternative approach would be to identify port trucks and drivers through existing Department of Motor Vehicles (DMV) databases, and withhold current certifications until the air quality regulations could be met. Adding additional requirements in the CHP-BIT inspection program may also be another suitable option. CARB staff should analyze the enforcement issue very carefully so as not to send port truckers into other vocations with fewer restrictions.

#### Focus on Outreach and Implementation

Although this report identifies several strategies to reduce emissions from port trucks, the focus for CARB staff should be program outreach and implementation. Port truck drivers are a very dynamic and diverse group, and historically, effective outreach to individuals has been difficult. Program implementation needs to be carefully planned, and maintaining the balance between reducing emissions while protecting jobs and earnings is critical.

Again, we would like to thank you for the opportunity to provide comments on the report. We look forward to continuing to work with CARB staff on this and other emission reduction projects. Please do not hesitate to contact us if you have any questions.

Sincerely,



Roberta Reinstein  
Manager, Environment & Safety