



San Pedro Bay Ports Clean Air Action Plan

Truck Program Questions and Comments Summary

- What are the anticipated increases in shipping costs for the concession approach?
- Will there be a shortage of drivers and/or truck capacity under the concession approach?
- What other kinds of potential disruptions are anticipated as a result of the proposal?
- Why penalize a truck company who has 100% clean burning 2007 trucks and is not willing to have employees or apply for a concession?
- When can Independent Owner Operators (IOO) find out about the truck program, and when will it go into effect?
- Licensed Motor Carriers (LMC) will be required to obtain a “concession” from the ports. How much will the fee be and will it be charged on an annual basis?
- Assuming that state bond money is not available for several years, how will that affect the amount of the Truck Impact Fee (TIF)?
- Will the TIF be adjusted on a periodic basis – and if so, at what intervals?
- When will the TIF be assessed? Will LMC’s have to pay at the marine terminal gate for each inbound move or will LMC’s provide the ports with some type of deposit, which will be drawn down according to gate activity?
- What “local security mandates” are envisioned under the Clean Truck Program?
- If the ports fund the purchase of a 2007 model year truck, is the LMC required to repay the port – and if so, under what terms?
- Explain the rationale behind your statement that drivers paid by the hour will “reduce inefficient truck queuing.”
- How will the employee requirement be enforced? What proof will be required and who will do the enforcement?
- Who will oversee enforcement of the LMC “truck maintenance plan” and what will the plan entail?
- With respect to the ban of pre-1988 trucks as of January 1, 2008 given that such a ban will eliminate approximately 14% of the truck fleet, how will the loss of these service providers affect the flow, velocity and cost of moving cargo through the ports?

- Does the estimated 80% reduction in emissions within five years take into account the air quality impact of those banned trucks being utilized in another capacity in Southern California?
- What does the TIF fee represent? Is it only for truck replacement, or does it include all administrative, enforcement, staffing and legal costs associated with this program?
- Have the ports estimated the cost impacts on drayage rates under the CAAP? If so, can that be shared with the trade community?
- What role do you see the marine terminal operators playing in the administration or enforcement of this program? Will it place new requirements on terminal operators and if so, have you estimated the cost impacts to the marine terminal operators?
- What are the “minimum requirements” to get a concession?
- What will be the conversion rate of switching to employee drivers during the five year transition period?
- What is meant by an “approved concessionaire maintenance and training program?”
- For those trucks that are “banned” from the port, how will that be enforced and how will you determine the age of the truck at the terminal gate?
- Will all trucks (fuel, flat bed, maintenance etc.) arriving at the ports be subject to the TIF fee?
- If the issue of cleaner trucks is resolved, will the issue of employee drivers versus owner operators still be an issue?
- With respect to the TIF, why is there an assumption that the fee collection and re-distribution program will operate more efficiently or more quickly than a free market system operating under a state-wide truck emissions standard?
- Will the “concession” system foreclose entry by companies and owner/operators on the edge of the market that might otherwise periodically divert trucks to drayage service if prices rise in response to decreased supply?
- Will there be an opportunity for new participants in the drayage market if they have vehicles that meet the emissions standards?
- A statewide emissions program to regulate trucks would address all trucks in a uniform manner and be the most effective mechanism to reduce emissions.
- What is the reason for coupling of a driver’s employee status with a program that sets truck emission standards?
- What is the legal basis for the ports implementing a concession program, and can that information be provided?
- Ensure that the environmental standards outlined in the truck proposal are consistent with: (a) the emission reduction goals outlined in CAAP; and (b) the

emission targets the ports are currently developing with the South Coast Air Quality Management District (SCAQMD).

- Ensure that the ports' truck fleet continues to turnover to cleaner technologies beyond the first five years.
- Structure the program to phase out the oldest trucks within the pre-1988 category first.
- Clarify how alternative fuel trucks will be folded into the program. Recommend that the concession model require all participants to meet a sufficient minimum percentage of alternative fuel trucks.
- Outline what efforts will be made to require that the cleanest trucks available are placed into the port drayage fleet. Specifically, ensure that trucks added to the fleet prior to 2010 meet a 1.2 g/bhp hr NO_x standard and trucks replaced after 2010 meet the 0.2 g/bhp hr NO_x standard.
- Clarify how the Infrastructure and Environmental Cargo Fee (IECF) relates to the trucking proposal, if at all.
- Ensure that motor carriers servicing the ports properly maintain new trucks and retrofit devices to minimize problems associated with control device deterioration, lack of maintenance or tampering. More details about how compliance with environmental standards will be monitored should be provided.
- The ports should work with the CAAP stakeholder group to identify and mitigate community impacts from port drayage trucking.
- Reliance on proposed CARB truck rule(s) will not achieve emission reductions as aggressively or as rapidly as will the CAAP.
- A requirement should be made for every truck entering the Long Beach and Los Angeles ports to comply with the CARB/CalEPA Periodic Smoke Inspection Program.
- Participants in the recycling industry are on very low profit margins. Any extra cost to conduct business will do considerable damage to this industry and throw the national trade deficit into greater imbalance.
- There is a concern that unionized terminals slow the process, and unionized truck drivers will exacerbate the problem and remove any incentive to perform.
- Utilize biodiesel, which has greatly reduced emissions of particulates and sulfur oxides, and can be used in most modern diesel engines without modification. Biodiesel is made from domestically grown oilseed crops like soy and corn, so it benefits our farmers, the local economy, and reduces our national dependence on imported petroleum.
- Distributors and installers of retrofit devices can provide experienced insight, perspective, and help set realistic expectations for the retrofit process. It is important for the group to have a sense of what is involved in the installation of the retrofit devices, the capacity of maintenance facilities, and what the limitations are (including qualifying the trucks).

- [Translated]: Do not approve the proposed law that will directly affect all the owners, since our profits are insufficient to invest additional money in the business.