



# COASTAL SAN PEDRO NEIGHBORHOOD COUNCIL

**Doug Epperhart**  
President  
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Vice President  
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Secretary  
**Louis Dominguez**  
Treasurer

January 23, 2019

Port of Los Angeles  
Chris Cannon, Director Environmental Management  
P. O. Box 151  
San Pedro CA 90733-0151  
caap@cleanairactionplan.org

Subject: Draft 2018 Feasibility Assessment for Drayage Trucks Comments Submittal

At the January 22, 2019 meeting of the Board of Directors, the following resolution was passed:

*Resolved*, the Coastal San Pedro Neighborhood Council shall submit the following letter to the Port of Los Angeles as a comment to the “Draft 2018 Feasibility Assessment for Drayage Trucks”; and

*Be it further resolved*, the Coastal San Pedro Neighborhood Council requests a minimum of a 60 day extension to the comment period.

To whom it may concern,

The policy and investment likely to result from the Ports’ Truck Feasibility Assessment will greatly influence policy decisions and investments throughout the US and even beyond by driving economies of scale, market dynamics, and advancing technological capability. I thank you greatly for requesting Comments and note that the current Draft Feasibility Assessment is based on static parameters which will drive planning limited to specific technologies and economics that may prove ill-advised as engineering advancements and changes in fuel and infrastructure costs and availability evolve.

The Study must provide evaluations of multiple scenarios for phased implementations of different fuel technologies, even simultaneously in varying mixes, and must not focus on limited implementation models, such as the current 11,000 Broadly Applicable Truck population.

The costs modeled in the Study must be considered variable due to evolving economic conditions and not limited to single scenario calculations such as the Total Cost of Ownership based on 12 years, fixed costs of fuels and batteries, hydrogen production, and electric utility rates.

1840 S Gaffey St., Box 34 • San Pedro, CA 90731 • (310) 918-8650 •  
cspnclive@gmail.com



The work of the Study must continue as an uninterrupted, on-going effort to update affected sections as technology advances and economic forecasts change. The Study must be considered a dynamic and living document with revisions to be issued with the quarterly Clean Air Action Plan updates, next planned for 1st Quarter 2019.

Please also consider the concern that, as trucks are the greatest contributor to Greenhouse Gas emissions at the Port of Los Angeles and a top contributor at Long Beach, the production, storage, and transfer of natural gas releases methane, a significant and long-lasting Greenhouse Gas. Any calculations of the benefit resulting from reduction in tail pipe emissions from Natural Gas fuel technologies must be revised to include consideration of the increased methane release, estimated at between two and three percent of natural gas consumed.

Please consider the following four examples as potential efforts to broaden the evaluation to multiple Assessment scenarios as suggested above which could be performed through pro- forma spreadsheet software:

- 1) Model varying quantities of truck fuel technology platforms among the fleet of frequent and infrequent truck populations. Among the complete fleet of trucks, evaluation of discreet quantities by technology type provides broader perspective with different numeric outcomes through varying the quantities in each fuel-technology platform. Cost projections must be modeled based on the multiple fuel technology mix scenarios.
- 2) Provide varying time period projections for Total Cost of Ownership allowing for different financing and capital expense strategies and planning.
- 3) Calculate cost outcomes based on multiple scenarios as the costs associated with each fuel technology and infrastructure is likely to vary and are subject to changes. For example, the electricity charge estimated for Department of Water and Power may be reduced substantially based on an Electric Vehicle rate, the cost of Natural Gas may rise substantially, and advancements in hydrogen production will drastically reduce the cost of fuel cell power.
- 4) Evaluation must be included of the potential impacts from a marginal container fee to fund California State Ports' leadership in the transition to cleaner technology, which may greatly affect Total Cost of Ownership through increased incentives and subsidies possible through a shipping fee implemented state-wide.

We request your consideration of and response to the above recommendations.

Thank you.



Doug Epperhart  
President

On behalf of the Coastal San Pedro Neighborhood Council Board