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Review of North American Logistics Basics: Heavy Duty Truck Parking Report

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Introduction

On August 19, 2025, the Truck Parking Club released a report, as well as a press release, claiming that there is no shortage of truck parking and that government funding is not needed.

The report asserts, "We know for sure that there is sufficient truck parking because the freight does move." Concluding that, "the solution isn't building 1.7 million new parking spaces. It's connecting the 23 million spaces that already exist but aren't accessible to drivers who need them."

There's just one problem – well, there's actually more than one as we'll discuss shortly – Truck Parking Club's report is just flat out wrong.

This review evaluates their report, entitled *North American Logistics Basics: Heavy Duty Truck Parking* (NALB). NALB presents itself as an early attempt to add "some science," explicitly fills in gaps with "common sense" estimates, claims only order-of-magnitude precision,[1] and tolerates uncertainties up to 25 percent.

These methodological commitments inherently prevent replication and compound error at every step. NALB also asserts there is "precious little" public data beyond a few sources, and then leans on four proprietary models to generate its core claims. This intrinsically reverses the burden of proof: It asks policymakers to accept unaudited inputs and discounts years of state and federal work.

This review illustrates how NALB inflates (1) "supply" by definition, (2) fabricates "demand" by compounding assumptions, (3) creates errors in converting spaces to "slots," (4) misapplies external sources via mechanical multipliers, and (5) smooths away the exact time-of-day and geographic spikes that define the real parking problem.

[1] "Order-of-magnitude" means that the figures are rough estimates. It can be useful for vast ranges but it is not a substitute for accuracy

The result is not decision-grade research;[2] it is a stack of assumptions that yields big, headline-ready numbers while obscuring the practical overnight rest constraint documented elsewhere in the report.

Methodological posture and replicability

NALB elevates author judgment to the status of data. The report asserts that it is addressing areas of research that have "never been formally surveyed." It then proceeds to substitute existing data sources -- such as the Bureau of Transportation Statistics Vehicle Inventory and Use Survey (VIUS) and the Federal Highway Administration's (FHWA) Clearinghouse for Truck Parking Publications, with "common sense" estimates – and declares confidence in "order-of-magnitude" estimates despite ±25% uncertainty.

Major inputs – including "active" vehicle counts, stop frequencies, added-miles assumptions, "meals while driving," and weekday/weekend patterns – are pinned to four proprietary models rather than to auditable datasets.

Our review tracks dozens of these upstream figures to the author's private models or estimates. This is supposition presented as analysis.

The problem is not merely that assumptions are present; it is that the paper's most consequential numbers *depend* on those assumptions. When the inputs are non-reproducible, the outputs – no matter how many footnotes accompany them – cannot be treated as decision-grade.

Inflated "supply" by definition, not observation

The paper's central maneuver is a "definitional sweep."[3] For example, NALB counts any location "where the truck has permission to park" and that has "minimum safety characteristics" as a "legal" space, then explicitly includes informal and non-public locations – diners, big-box lots, shipper and receiver facilities, and carrier yards – alongside

[2] "Decision-grade research" is a high-quality, rigorously designed analysis that provides a strong, reliable basis for making critical decisions. The research is transparent and systematic, with well documented methodology and a low risk of bias. Its conclusions are based on high-quality evidence and comprehensive data.

formal truck stops and public rest areas.

As a result, the paper concludes that approximately 3.8 million entities (~3.8M) – again, generated through private models – provide 23.4M "legal" spaces in the U.S. NALB does concede, however, that "many entities … do not allow public truck parking," that only 670,000 spaces are publicly available, and that only 380,000 are sufficient for a trucker to use them for a required rest period.

Counting places that "seldom provide overnight parking" as usable capacity does not reflect true inventory; it is inflation by definition.

Our review finds no auditable census for the number of such entities, parking spaces per site, public-access ratios, or verified overnight eligibility by hour. By contrast, FHWA's Jason's Law inventory – used by states, metropolitan planning organizations, and the federal government – enumerates on the order of ~313,000 spaces (~273k private truck stops + ~40k public rest areas).

NALB's "millions" are achieved by including non-public and short-stay locations as if they were rest-eligible (i.e., 10-hour break), public truck parking capacity.

The supply inflation matters because it frames the narrative that enough pavement "exists," so the main challenge is steering drivers to the "right" subset.

The "space-to-slot" device contradicts the paper's rest definition

NALB converts parking spaces into daily "slots," proposing that a single space can serve 32 users per day if each occupies it for 45 minutes – and then *assumes this for all spaces*, acknowledging the result "certainly overstates the true supply." Yet in the same section, "rest" is defined as a 10-hour occupation. A space cannot be simultaneously a high-throughput short-stay resource and an overnight rest

[3] A "definitional sweep" is a flawed or overly broad generalization that fails to capture the nuances of a particular subject. It ignores important context, exceptions or complexities.

stall. This internal contradiction fabricates capacity *on paper* where it does not exist *in practice* – precisely in the category (i.e., rest) that defines the real parking shortage.

Our review spells out the operational implication: a rest space can handle *either* 32 short breaks, *or* 2 long rests, *or* some mixture of the two. Treating *every* space as if it offers 32 turns/day while also meeting the 10-hour rest break is a mathematical sleight of hand, not an inventory.

Demand fabricated by compounded assumptions

On the demand side, the paper starts with a 6.6 million vehicle baseline, though 2.9 million would be more realistic according to VIUS, then jumps from 4.2 million "active" vehicles to 12.6 million daily "slots" by assuming three sanitary breaks per day. Elsewhere it expands the requirement to 14.5 million slots and asserts that "over two million trucks need a rest parking space every workday."

The chain is not demonstrated with hour-by-hour ELD, Telematics, or facility-level utilization; it is engineered via internal models and "common sense" frequencies.

The paper also compounds needs – implicitly treating a large share of "active" trucks as if they require the same resources at the same times – contrary to basic utilization logic and well-documented nighttime concentration. The result is demand by assumption: amplified totals that say little about where or when the actual bottlenecks occur.

NALB's own math shows overnight parking is where true shortages occur

NALB claims that ~3.8 million entities provide 380,000 overnight rest spaces – though at times, they change this figure to 670,000 without reconciling the discrepancy. However, using the paper's own arithmetic, we arrive at a very different conclusion: there is, in fact, a significant shortage of public truck parking.

Let's assume, as the paper does, that truckers "need" ~2.4

million rest slots every day. If we then divide the number of hours in a day (24) by the 10-hour rest requirement, we find that each rest space can serve roughly 2.4 trucks per day. Multiplying this throughput rate by the number of public rest spaces available (380,000), we estimate a daily capacity of ~912,000 public rest slots (380,000 × 2.4).

When compared with the stated need of 2.4 million rest slots, this results in an implied shortfall of ~1.5 million public rest slots per day.

In other words, within NALB's own framework, the true bottleneck is overnight, public, rest-eligible capacity--not in theoretical access to a diffuse and largely inaccessible universe of non-public pavement.

"Right spaces" as moving goalposts

NALB proposes a "right space" construct (legal, on route, amenitized, available at need, known in advance, etc.). It then claims national demand for well over 929 million "right" spaces and concludes that fewer than 1 in 40 of the 23.4 million "legal" spaces are "exactly right." The calculation mixes an annualized flow (trips × stops × timing) with a point-in-time capacity count to produce a ratio with no practical interpretive value.

Our review calls it what it is: an engineered statistic not traceable to public microdata, used to dramatize a scarcity constructed by the model itself.

Misapplied sources and mechanical multipliers

NALB repurposes ATRI's finding that drivers end the day 56 minutes early to secure parking, into drivers spend "56 minutes searching" for parking every time they stop for a break – inflating the national cost into nine figures. This is a category error that inflates the economics by construction.

The paper also asserts 15 miles of off-route travel ("circuity") for each rest stop – without sourcing the figure

– and applies it as if every rest event incurs that penalty.

A similar problem appears in the treatment of "lost driving time." NALB attributes lost driving hours to parking in the "wrong place" while ignoring binding Hours-of-Service constraints (the 14-hour duty window; 60/70-hour weekly caps). Drivers failing to maximize their 11-hours of allotted driving time is not evidence of a shortfall in "right" spaces. These are mechanical multipliers – unsupported inputs pushed through cost arithmetic to yield dramatic totals.

Temporal and spatial structure is smoothed away

NALB repeatedly claims that data scarcity necessitates simplifying assumptions and state-level averages. But the field is not a vacuum. FHWA's Jason's Law studies, the Truck Parking Development Handbook, FHWA's Clearinghouse of truck-parking publications, and BTS's FAF together document pronounced nighttime and midweek spikes and persistent corridor/metro hot spots. Smoothing those realities away gives room for private models and "common sense" estimates, destroying the true picture that policymakers actually need.

Narrative claims at odds with evidence

NALB states, "We know for sure that there is sufficient truck parking because the freight does move," then reframes the challenge as finding the "RIGHT" space. That rhetoric contradicts federal inventories and industry surveys: truck parking has ranked as a top driver concern for years;[4] over 75% of drivers report nighttime difficulty;[5] and unauthorized/unsafe parking is widespread when legal options are missing.[6] The record shows that drivers often keep rolling to find parking or resort to unsafe locations – not that sufficiency exists.

Health, theft, and liability claims without causal evidence

NALB links "not parking in the right location" to millions of lost workdays from illness and morbidity. No causal chain is

[4] https://truckingresearch.org/about-atri/atri-research/top-industry-issues/
[5] https://ops.fhwa.dot.gov/freight/infrastructure/truck_parking/jasons_law/truckparkingsurvey/index.htm
[6] http://files.truckerpath.com/web/trucker-path-parking-white-paper-2018.pdf

provided. Our review not only flags these as implausible and unsourced, but they should not be used to price externalities or justify the paper's billion-dollar conclusions.

Why these defects are fatal for decision-making

When supply is expanded by definition, demand is compounded by assumption, the space-to-slot device contradicts the paper's own rest definition, external sources are misapplied via multipliers, and the time-of-day/corridor structure is averaged away, the result is a set of impressive-looking numbers that do not survive contact with the measured world.

Anchoring policy debates – how do we solve the truck parking crisis – on those outputs would focus attention on assumptions and speculation rather than the real-world, time- and location-specific conditions that define the truck parking problem.

The bottom line

The NALB is largely wild speculation based on a severe absence of substantiated and empirical data.

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