

March 25, 2024

Michael S. Regan, Administrator
U.S Environmental Protection Agency
1200 Pennsylvania Avenue N.W.
Washington, DC 20004

Re: Letter of Support for the New York City Department of Transportation (NYC DOT) Environmental Protection Agency (EPA) Climate Pollution Reduction Grant Implementation (CPRG-I) Program application, FY 2024.

To Whom it May Concern:

I write to you in support of FREIGHT-30: Facing Regional Environmental challenges by Implementing Green and Healthy Transportation by 2030, NYC DOT's application for the EPA CPRG-I Program. This grant will fund transformative freight decarbonization initiatives that will continue our reduction of greenhouse gas (GHG) emissions and other harmful pollution while promoting the health and well-being of federally designated Disadvantaged Communities.

Over 265 million tons of cargo enter, leave, or pass through NYC every year. This is estimated to grow 68% by 2045. Trucks deliver close to 90% of freight tonnage in NYC, compared to the national average which is closer to 70%. Currently, commercial transportation accounts for about 10% of the transportation sector's GHG emissions in NYC.

Moreover, a little more than half of NYC's census tracts are classified as Disadvantaged Communities according to the Climate and Economic Justice Screening Tool (CEJST), facing higher levels of pollution and greater health burdens. NYC is taking urgent steps to decarbonize the freight network to achieve its commitment to carbon neutrality by 2050, while focusing investments in Disadvantaged Communities to facilitate a just energy transition. This project proposes various initiatives to increase freight efficiency while further decreasing harmful emissions as the trucking industry transitions to zero and near zero emission vehicles.

One initiative aims to expand and scale up NYC DOT's commercial cargo bike incentive program to transition hyper local truck deliveries to cargo bike. The strongest way to do that is to establish a network of small-scale local delivery hubs, or "microhubs," to transfer goods from larger freight vehicles to smaller, low-emission electric vehicles or human-powered modes for the last-mile delivery. Another initiative, undertaken in conjunction with NYC Economic Development Corporation (EDC), will modernize marine infrastructure and integrate shore power to expand the "blue highways" network. Finally, new truck electrification and parking, including the funding of electric charging depots for trucks and other medium-duty vehicles accessible to any company, will be strategically located near Industrial Business Zones and existing freight hubs and will provide much needed infrastructure to support the transition to zero emission trucks in the New York City metropolitan region. Currently, there is not enough safe overnight truck parking to meet demand, this will only be exacerbated as more EV commercial vehicles hit the market. We applaud NYC DOT for proactively working on this issue and support investment in complementary charging and parking infrastructure.

The Trucking Association of New York has worked with industry, advocacy, and City partners on all these initiatives, and we are particularly encouraged that our calls for parking capacity, freight hubs, local hubs, and modernized infrastructure are all factoring into NYC DOT's long-term planning. The proposed fleet advisory services component of this grant will further accelerate the adoption of zero emission medium and heavy-duty vehicles and ease the transition for businesses. We believe that taken together, these measures are scalable across the freight sector. This project represents a long-term commitment to sustainability and environmental justice that will promote cleaner, healthier, and equitable communities. Thank you for your consideration and support.

Sincerely,



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