



March 28, 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:

The New York League of Conservation Voters (NYLCV) enthusiastically supports 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 significantly reduce greenhouse gas (GHG) emissions and other harmful forms of pollution while promoting the health and well-being of federally-designated Disadvantaged Communities.

One of NYLCV's top policy priorities is decarbonizing our transportation sector to reduce GHG and improve air quality, a longstanding environmental justice issue. Over 265 million tons of cargo enter, leave, or pass through NYC every year. Trucks alone deliver close to 90% of goods in NYC – compared to the national average of 70% – and account for 10% of citywide transportation GHG emissions. Moreover, 52% of NYC's census tracts are classified as Disadvantaged Communities according to the Climate and Economic Justice Screening Tool (CEJST), facing higher levels of air pollution and greater health burdens. NYLCV appreciates that 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 four cost-effective initiatives to equitably reduce freight GHG emissions. The first initiative aims to expand and scale up NYC DOT's successful commercial cargo bike incentive program to transition local truck deliveries to the cleanest and most efficient technologies. The second will 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 efficient last-mile delivery. The third—undertaken in conjunction with NYC Economic Development Corporation (EDC)—will modernize marine infrastructure and integrate shore power to expand the "blue highways" network in a way that minimally impacts neighboring communities. 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 support the transition to electric trucks in the New York City metropolitan region.

NYLCV supports this application because, taken together, these measures are replicable and scalable across the freight sector. They leverage existing programs to maximize GHG reductions by 2030, and, most importantly, they target investment in NYC's Disadvantaged Communities. NYC DOT will work with the Port Authority of New York and New Jersey to expand these initiatives across agencies and further develop green freight programs within the New York Newark-Jersey City Metropolitan Statistical Area.

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,

A handwritten signature in black ink, reading "Alia Soomro". The signature is fluid and cursive, with the first name "Alia" and last name "Soomro" clearly distinguishable.

Alia Soomro
Deputy Director, New York City Policy
New York League of Conservation Voters