

March 29, 2024

Administrator Michael Regan  
U.S. Environmental Protection Agency  
1200 Pennsylvania Avenue, N.W.  
Washington, DC 20460

**Re: Application EPA-R-OAR-CPRGI-23-07 for Electric Vehicle Charging Infrastructure for Taxis and Rideshare Vehicles and Zero-Emission Ground Support Equipment Voucher Program**

Dear Administrator Regan:

I am writing to express Waev Inc.'s support for the Port Authority of New York and New Jersey's application to the United States Environmental Protection Agency's NOFO (**EPA-R-OAR-CPRGI-23-07**) for its Climate Pollution Reduction Grants (CPRG) Program. The Port Authority's request to the EPA addresses the implementation of two measures prioritizing GHG reduction: electric vehicle charging infrastructure (Measure 1) and airport ground support equipment (GSE) electrification (Measure 2).

Per the New York – New Jersey metropolitan statistical area's (NY-NJ MSA) Priority Climate Action Plan (PCAP), transportation and stationary energy sectors are the largest sources of GHG emissions in the region. Both measures proposed to the EPA yield marked reductions in GHG emissions at Port Authority airports which include three of the nation's largest and most heavily transited air travel facilities for the movement of both people and goods globally. The measures outlined in the Port Authority's application reflect its commitment to climate action and will help the agency achieve its ambitious net zero goal.

The Port Authority's proposal aligns with Waev's goals to provide zero-emission vehicles for incorporation in its operations. Measure 2 of this proposal targets thousands internal combustion GSE that operate at Port Authority's airports. Stakeholders represented among the GSE owner and leasing community at the airports have identified upfront capital cost of zero emission GSE as a challenge to meeting net-zero goals.

Waev is a U.S. electric vehicle (EV) manufacturer with its headquarters and sole factory located in Anaheim, California. Waev manufactures, distributes, markets and supports Tiger electric tow tractors and conversion kits, Taylor-Dunn electric industrial vehicles, and GEM electric Low-Speed Vehicles (LSVs) for airport ground support operations.

All of our vehicles are engineered for dense, low-speed environments like airports. They all provide a more cost-efficient way to acquire and operate EVs, and they all help knock down barriers to go electric. They are all centered on being easy to charge, easy to maintain, easy to operate, and easy to service with parts.

- [Tiger](#) replaces gas and diesel tractors with a smart and modern Li Ion Tractor that operates and is serviced like the familiar Tug tractor and our re-power kits convert similar gas and diesel tractors to Li-Ion power.
- [Taylor-Dunn](#) replaces gas tractors, trucks, vans, UTVs, and golf carts with a durable steel body workhorse that can haul and tow as much as full size pick-ups, but with price, range, and speed are purpose-built for airport campuses.

- [GEM](#) replaces cars, vans, trucks, UTVs, golf carts with an EV that has automotive safety and in-cab features like full doors and heat, but with a price, range, and speed that is purpose-built for airport campuses.

Waev strongly supports the Port Authority's proposal and respectfully request that the U.S. EPA favorably consider the project request designed to reduce GHG emissions resulting from airside GSE and combustion engine vehicles traveling to and from Port Authority operated airports.

Thank you for your consideration of this critical project that aligns with CPRG Program goals.

Sincerely,



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President & CEO  
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