

March 28, 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 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 ITW GSE Inc. goals to incorporate zero-emission vehicles into 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 challenge to meeting net-zero goals.

Voucher programs, such as this, that have been launched in other states has made a significant impact in stimulating the market to electrify their fleet. The cost to manufacture electric equivalent equipment is two to three times the cost of fossil fuel. With the rising operation cost to the air carriers and ground handlers it is prohibitive to make the additional investments to go electric and thus the need for these programs.

I strongly support 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,



Doron Milbaum
North America Sales Manager ITW GSE Inc.

