

February 28, 2020

Transportation & Climate Initiative

Draft Memorandum of Understanding of the Transportation and Climate Initiative (TCI)

Comments from the Port Authority of New York and New Jersey

The Port Authority of New York & New Jersey (Port Authority) builds, operates and maintains infrastructure critical to the New York/New Jersey region's trade and transportation network. These facilities include the country's busiest airport system, marine terminals and ports, the PATH rail transit system, six tunnels and bridges between New York and New Jersey, the Port Authority Bus Terminal in Manhattan, and the World Trade Center site. For more than eight decades, the Port Authority has worked to improve the quality of life for the more than 18 million people who live and work in the New York and New Jersey Metropolitan Region - a region that supports 9.2 million jobs.

In October 2018, the Port Authority embraced the Paris Climate Agreement, making it the first US transportation agency to do so. The Port Authority is committed to reducing emissions associated with our facilities and improving air quality for neighboring communities. This includes a variety of innovative programs and initiatives to conserve energy, increase our use of renewable energy, and transition vehicles and equipment from fossil-fuel to zero-emissions models.

The Port Authority wishes to reiterate its support of the Transportation & Climate Initiative and encourage both New York and New Jersey to participate in the program as Signatory Jurisdictions. As a bi-state transportation agency that enables the movement of people and goods throughout the region, we believe there is a strong need for regional, collaborative solutions to address transportation-related emissions. Furthermore, given the significant impact that Ports and Airports have in environmental justice communities and our focus on reducing emissions from these facilities, we have a deep understanding of how TCI proceeds can be used to address emissions that impact these communities.

The Port Authority respectfully submits the following comments on the Draft Memorandum of Understanding for the Transportation and Climate Initiative.

1. Affected fuel: Significant emissions stem from equipment at the seaports and airports that operate on off-road diesel. Given the overwhelming presence of these facilities in environmental justice neighborhoods, we believe that both diesel and gasoline emissions should be capped to equally treat fuels that have significant on and off-road utilization. Also, as noted in our November 5, 2019 comment letter on the TCI framework, it should be noted that some off-road equipment at the airports run on gasoline and thus the emissions cap on gasoline and on-road diesel may unequally impact equipment types and owners within the same category.
2. Support for emissions sources that face the greatest challenges to decarbonize: The impact of emissions from vehicles and equipment that do not have a viable electric option, in the near future should not be overlooked in the determination of how proceeds should be used. Even if an electric model is commercially available, the barriers to conversion for off-road equipment and heavy-duty trucks are higher than they are for passenger EVs or even buses, due to the increased cost premium, usage needs, and round-the-clock operations of specialty equipment. Again, given the overwhelming concentration of these types of equipment in environmental justice communities, enabling emissions reductions in this sector will provide the most impact to EJ

community residents. Supporting low-carbon liquid fuels, funding demonstrations of newly introduced electric equipment, and funding charging infrastructure at seaports and airports are essential tools for addressing emissions from these sources. Given the cross-jurisdictional nature of TCI and emissions from air, rail and marine people and goods movement, it makes sense for TCI proceeds to be used to accelerate decarbonization in these sectors of the economy.

3. Targeted support for conversion to electric for-hire vehicles: For-hire vehicles have higher levels of utilization than most passenger vehicles. These vehicles are among the biggest sources of emissions at Port Authority facilities - second only to aircraft at our airports. Independent drivers are more likely to convert their vehicles to electric if they have financial support to cover the higher up-front cost of EVs, and strategic investment in fast-charging infrastructure to support these fleets - for example at airports - would achieve meaningful GHG reductions and improve air quality and reduce noise in surrounding communities, many of which are environmental justice communities.

The Port Authority commends both New York and New Jersey for their stakeholder engagement on TCI, and strongly encourages both States to participate in the cap-and-invest program. We look forward to continued collaboration to make this program as effective as possible in catalyzing the transition to a low-carbon economy.

Sincerely,



Christine Weydig
Director
Office of Environmental and Energy Programs