



September 23, 2022

Founded in 1991, the New York City Environmental Justice Alliance (NYC-EJA) is a non-profit, 501(c)3 citywide membership network linking grassroots organizations from low-income communities of color in their struggle for environmental justice. NYC-EJA empowers its member organizations to advocate for improved environmental conditions and against inequitable environmental burdens by the coordination of campaigns to inform City and State policies. Through our efforts, member organizations coalesce around specific common issues that threaten the ability of low-income communities of color to thrive.

NYC-EJA and other environmental justice advocates have supported the concept of congestion pricing for over 15 years. Our members reflect the 75 percent of low-income New Yorkers of color, who rely on the Metropolitan Transportation Authority (MTA) buses, and 66 percent, who rely on subway service to get around. As such, access, reliability, and affordability of public transportation is paramount in our support for congestion pricing, which we see as both supporting mass transit as well as reducing emissions.

**However, to be a truly environmentally just plan, congestion pricing cannot lead to any increases in traffic pollution emissions in environmental justice communities - particularly the Bronx.** From the Environmental Assessment, it is projected that truck traffic and emissions could increase on some Bronx roadways. The MTA’s intent to address increased traffic and emissions in the Bronx via traffic signal changes and adding more air pollution monitors is woefully inadequate.

The Bronx is one of the most racially diverse areas in New York City but the difference between the borough and the city could not be any starker. While the annual median household income in New York City is \$67,046, the annual median household income in the Bronx is \$41,895. In the Bronx, 56 percent of households are rent burdened and over 27 percent of residents live in poverty. The borough is also home to one of the poorest congressional districts, NY-15, in the United States.

Low-income communities and communities of color in New York City are disproportionately impacted by poor air quality due to historic discrimination in access to housing and racist land-use planning that placed polluting infrastructures and facilities in Black and Brown neighborhoods. With some of the worst pollution levels in the United States, air pollution levels are so high that in some Bronx neighborhoods it is estimated that 20 percent of children have asthma. Bronx residents require hospitalization for asthma at five times the national average and at rates 21 times higher than other New York City neighborhoods. The asthma rate in the South Bronx is eight to twelve times higher than the national average and the area has been nicknamed “Asthma Alley.”

In Hunts Point and Longwood, asthma emergency department visit rates among children under the age of 18 are double the citywide rate. In the South Bronx, mobile monitoring revealed consistently higher measurements proximate to the Hunts Point Food Distribution Center—the second-largest food distribution center in the world, generating an astounding 15,000 truck trips daily. Overall, the Hunts Point community experiences some 20,000 diesel truck trips into and out of the neighborhood each week. It is not uncommon for long-haul truck operators to layover at the Markets for some eight to twelve hours at a stretch while waiting for goods or to comply with U.S. Department of Transportation rest period requirements.

Despite the stark environmental and public health disparities the Bronx faces daily, the Governor and the MTA have multiple opportunities to begin mitigating these impacts. The New York State (NYS) Climate Leadership and Community Protection Act (CLCPA) called for the identification of “disadvantaged communities” in NYS to properly steer 35 to 40 percent of the State’s clean energy funds, in addition to dedicated resources from the Infrastructure Investment and Jobs Act (IIJA) and the Inflation Reduction Act through the Justice40 initiative, to the State’s most climate-vulnerable communities. Under the draft criteria released by the Climate Justice Working Group, nearly the entire Bronx qualifies as a “disadvantaged community”. Moreover, under the CLCPA, the NYS Department of Environmental Conservation (NYSDEC) has embarked on an unprecedented hyper-local air monitoring program for 10 counties across the state - including the Bronx - with the intent of identifying mitigation opportunities. In her State of the State book from 2022, Governor Hochul herself announced her intention to “transform Hunts Point into a Clean Distribution Hub” and stated that this “targeted initiative will address transportation, electrical infrastructure, and facility needs and upgrades; identify the biggest emitters of pollution; and work with key public and private industry stakeholders on strategies to expedite critical grid upgrades and operational improvements.”

**Therefore, the MTA and Governor Hochul have moral and regulatory obligations to - and opportunities for - the Bronx to not just shoot for a “net zero” approach to increasing traffic and emissions in the Bronx, but rather to commit to a “net positive” approach, wherein the action leads to lower levels of emissions than would have otherwise occurred under business as usual.** When it comes to emissions, the Bronx is, unfortunately, a “target-rich environment”; coupled with the billions in climate and infrastructure funding that are expected to come from the federal government, the MTA and the Hochul administration have ample “net positive” opportunities to reduce the emissions expected from projected traffic increases beyond those actual emissions. Below are some current State and City programs, pilot projects, and some community-supported policies and strategies that can be developed, expanded, and further funded with resources from federal and state investments to help reduce emissions over and above expected traffic emissions increases, and improve air quality in the Bronx:

**Electrifying the Hunts Point Markets** to become a model for climate resilience and sustainability. The Hunts Point Markets are the main supplier of fresh food and vegetables to the city and region and contribute to the extreme volume of truck traffic in the area, which has led to high rates of respiratory health issues. The following actions can be taken in partnership with the City of New York to accelerate the electrification of medium- and heavy-duty fleets operating out of the Hunts Point Market. To achieve this, some of the ideas proposed ideas in the [Hunts Point Forward Report](#) and other studies include:

- Eliminating the use of all stationary diesel reefer units for auxiliary storage at the Hunts Point Food Markets and replacing them with grid-connected electric Transport Refrigeration Unit (TRU) trailers, supplemented, if necessary, by battery storage to support the additional load.
- Developing a publicly accessible multi-user charging hub for medium- and heavy-duty vehicles (MHDVs) on AOU-2 or equivalently sized parcels within the Hunts Point Food Market.
- Implementing reduced gate fees at wholesale markets for zero-emission MDHVs.
- Future-proofing new truck parking spaces with stubs for charging station wiring.
- Installing curbside charging stations and grid connections along Halleck Street between Spofford and Oak Point, where inbound trucks typically queue to enter the Produce Market.
- Creating opportunities for large-scale battery deployment, enabling the Hunts Point Food Markets to bank low-cost New York Power Authority (NYPA) power for vehicle charging, peak shaving, and backup power.
- Incentivizing fleet conversions to zero-emission MDHVs by offering favorable leasing terms for distributors with EV fleets.
- Establishing carbon performance standards for future Hunts Point Food Market tenants.
- Install e-bike parking racks at wholesale markets.

**Increasing and expanding the New York City Department of Transportation’s (NYCDOT) goal of zero-emission vehicles to all industrial business zones (IBZ) across the city.** The NYCDOT currently aims to increase the adoption of zero-emission vehicles for a market share of 20 percent of freight deliveries in Manhattan CBD by 2030 to meet GHG goals. The program should prioritize the industrial business zones in the Bronx: Bathgate, Eastchester, Hunts Point, Port Morris, and Zerega.

**Introduce a busway on Fordham Road.** Under the “busway” scheme, only buses, trucks, and emergency vehicles will be allowed access while all other vehicles are allowed local access but must make the next available right turn off Busway. A busway can improve bus speeds and reliability and reduce congestion along the corridor.

**Replacing NYPA Peak Power Plants in the South Bronx with clean, renewable energy plus battery storage.** On days with extreme weather, like heat waves or sub-zero temperatures, residents consume more energy to stay cool and warm, which puts excessive demand on the grid. In response to this increased demand for electricity, highly polluting power plants known as “peakers” fire up in the South Bronx, Sunset Park, and other communities of color throughout New York City. These peaker plants spew harmful emissions into neighborhoods already overburdened by pollution, exacerbating widespread health problems. By replacing these polluting peaker plants with clean, renewable energy, we can reduce greenhouse gas (GHG) emissions, reduce electric utility bills, improve equity and public health, and make the grid more resilient in the face of increased storms and climate impacts.

**Invest in maritime and rail infrastructure to remove trucks off roadways.** The Freight NYC Plan was created in 2017, by the NYCEDC, to help overhaul the City’s aging freight infrastructure, slash the freight sector’s emissions, and create new jobs. Through the implementation of the 2017 Freight NYC plan, the City aims to eliminate 40 million truck miles annually, create 5,000 jobs over ten years, and eliminate 71,500 metric tons of GHG emissions each year and 30,000 pounds of particulate matter per year. A significant portion of these benefits and investments should be concentrated in environmental justice communities, particularly those in the South Bronx which faces high levels of air pollution from the city’s freight sector.

**Increase investments for IBZ and trucking businesses located in the Bronx.** The NYC Clean Trucks Program and New York Truck Voucher Incentive Program provide vouchers for fleet owners to replace their fossil fuel-powered vehicles with low or no-emissions trucks. The NYC Clean Trucks Program was first launched at Hunts Point and then expanded to other Industrial Business Zones across the city. The program has already provided funding to replace and retrofit 657 diesel trucks in Hunts Point. NYCDOT can expand these programs to target small fleet businesses, fleet owners of color, and women-owned trucking businesses which can further incentive and advance truck electrification.

**Expand the NYCDOT’s TRU Replacement Program.** The program replaced 58 diesel-powered units with electric and hybrid-electric alternatives within the Hunts Point Food market, thereby reducing the number of emissions generated by these systems. This program should be prioritized for additional funding to all stationary diesel reefer units for auxiliary storage at the Hunts Point Food Markets.

**Pilot green loading zones in the Bronx.** The NYCDOT’s Green Loading Zones Pilot aims to incentivize the use of electric and low-emission delivery vehicles including trucks by providing exclusive spaces for loading and unloading activities. The pilot is now in its scoping phase. As part of the agency’s initial assessment and pilot, sites in the Bronx should be selected and should be limited to zero-emissions vehicles.

**Cap the Cross Bronx Expressway.** With a \$2 million federal grant, starting in the fall of 2022, the NYC Department of City Planning, NYC Department of Transportation, New York State Department of Transportation, and NYC Department of Health and Mental Hygiene plan to begin working with local communities to improve air quality and more sustainably manage traffic congestion in the area. Capping of the below-ground sections of the 6.5-mile-long expressway is a project that could be funded with federal infrastructure funds to reduce emissions, reduce congestion, and reconnect communities disconnected by the highway.

**Fund The Bronx is Breathing: Reimagining a Cleaner Hunt’s Point pilot.** This project is a potential pilot that was pitched to the state’s Clean Transportation Prizes competition to install public charging stations for electric vehicles, provide electric MHDVs for tenants, launch an EV independent truck operators cooperative and create a system to repurpose EV batteries. Given the need for EV deployment and charging infrastructure at Hunt’s Point as well as the community’s support for the proposal, a commitment should be made to fund this proposal if it does not secure funding through the Clean Transportation Prize initiative.

Some State and City-wide potential policies that can also help include:

**Adopting the Indirect Source Rule** which aims to reduce particulate matter and nitrogen oxide emissions associated with but not directly tied to warehouse operations such as the use of fossil-fueled powered medium and heavy-duty vehicles. Warehouse operators would be required to track the operations of polluting trucks that enter and exit their properties. They would also be required to implement air pollution mitigation strategies at their sites to accrue points to meet annual compliance obligations.

**Adopting the Advanced Clean Cars II Rule** was recently approved by California. The rule establishes a year-by-year roadmap so that by 2035, 100 percent of new cars and light trucks sold will be zero-emission vehicles, including plug-in hybrid electric vehicles. New York State can be the first state outside of California to adopt the rule and address one of the major sources of pollution.

**Establish and convene a cross-agency City and State Environmental Justice Emissions Reduction Task Force.** The MTA has already committed to establishing an Environmental Justice Community Group that would meet on a bi-annual basis to share updated data and analysis and hear about potential concerns. The first meeting is planned to occur six months after the congestion pricing program begins. By establishing a cross-agency Task Force, near-term and long-term emissions mitigation investment and implementation plans can be developed. The Task Force members can be selected and announced before the end of the calendar year and convene within one month of the Environmental Assessment's approval. The Task Force can work to prepare and present recommendations to further reduce emissions in the Bronx within six months.

In conclusion, we need emission mitigation policies for the Bronx that are transparent, accountable, and measurable. For too long, communities in the Bronx have suffered from some of the worst air quality in the city for generations. For congestion pricing to authentically deliver on its promise of environmental justice, it must deliver on overall traffic and emissions reductions in the Bronx and other environmental justice communities.