

December 5, 2017

Charles Ukegbu, EdD  
Assistant Commissioner, Regional and Strategic Planning  
New York City Department of Transportation  
55 Water Street, 6<sup>th</sup> Floor  
New York, New York 10041

Dear Dr. Ukegbu,

I am writing on behalf of the Port Authority of New York and New Jersey (PANYNJ) in support of the New York City Department of Transportation's (NYCDOT) proposed rule DOT-40, "Development of Routes for Oversized Trucks Hauling Sealed Shipping Containers."

The proposed rule, which will "Provide a clearly defined, safe route for drivers to haul sealed ocean containers to and from Howland Hook GCT, exclusively using specified highways and streets," will enhance the ongoing economic competitiveness of the Howland Hook Marine Terminal operated by Global Container Terminal New York (GCT-NY).

NYCDOT's existing rules and procedures for permitting heavy containers along the one-mile route between the terminal and the Goethals Bridge are a significant disadvantage for GCT-NY in competing for business against other east coast marine terminals. The future of the Howland Hook facility and the thousands of direct and indirect jobs associated with it are in jeopardy without an efficient way to handle overweight containers.

The designated route described in the rule will provide the necessary connection between GCT-NY and the Goethals Bridge. However, the draft language could be read as missing two roadway segments (illustrated in the attached map), and so the Port Authority recommends replacing text for segments "ix" and "xv", as follows:

- Segment "ix" should read: "that portion of Gulf Avenue between Western Avenue and Edward Curry Avenue;" and
- Segment "xv" should read: "that portion of Western Avenue between Gulf Avenue and Richmond Terrace."

The Port Authority appreciates this opportunity to comment on the proposed rule that will benefit the only container terminal in Staten Island and the shippers, businesses and consumers who depend upon it. We look forward to continued collaboration on streamlining commercial motor vehicle regulations and supporting the economic growth and development of the New York/New Jersey region.

Sincerely,



Bethann Rooney  
Assistant Director, Strategy & Innovation  
Port Department

Map Illustrating PANYNJ Recommended Additions to Proposed Rule DOT-40

