

June 17, 2021

Taxi and Limousine Commission
33 Beaver Street, 22nd Floor
New York, New York 10004

Re: Sierra Club Formal Comments - Battery Electric Vehicles exemption

Dear Commissioners:

Sierra Club is writing to respectfully express concerns over the proposed rule change to the Taxi and Limousine Commission's (TLC) Local Law 147. Removing the waiver for Battery Electric Vehicles (BEV) to obtain For-Hire Vehicle (FHV) licenses would not align with local, state, or federal goals for greenhouse gas (GHG) emissions reductions and would delay the City's progress on clean transportation.

The transportation sector is currently the largest source of greenhouse gas emissions in New York contributing more than a third of the state's emissions. This pollution has been shown to increase the risk of asthma, heart attacks, cancer, and premature death. Transportation pollution impacts communities of color the most, making it crucial to prioritize zero emission vehicles in these communities. New York has set some ambitious climate goals through the Climate Leadership and Community Protection Act (CLCPA) including 85% reduction in ghg emissions by 2050. Eliminating the FHV license waiver for BEV is a step backwards in meeting local, state, and federal goals for GHG emission reductions.

The current BEV exemption has been positive for electric vehicle adoption, and the new proposed rule stands to stifle the purchasing of BEVs and in turn negatively impact the build-out of electric vehicle charging infrastructure. BEVs are one of the best tools to improve our air quality. Eliminating tailpipe emissions will benefit everyone, especially those that live near busy highways. Disallowing BEVs to obtain FHVs would set New York back in terms of incentivizing new BEVs entering the ridesharing market.

With over 2 million passenger vehicles in total on the road in New York City¹ the claim that 400 new BEVs approved for FHV licenses between 2019 and 2021 significantly contributes to congestion or GHG emissions through congestion is questionable. . Cutting down on rideshare/pool vehicle services that utilize BEVs would only increase the amount of trips New Yorkers take in gas combustion rideshare/pool vehicle services passenger vehicles and increase greenhouse gas emissions.

For these reasons, Sierra Club urges the Commission to reconsider implementing the proposed rule. I welcome any questions you may have regarding Sierra Club's position and can be reached at jessica.enzmann@sierraclub.org.

Sincerely,
Jessica Enzmann
Organizing Representative, Sierra Club Clean Transportation for All

¹ https://www.nyc.gov/html/dot/downloads/pdf/nyc_greendividend_april2010.pdf