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Taxi and Limousine Commission

Office of Legal Affairs
33 Beaver Street, 22nd Floor,
New York, NY 10004

Dear Taxi and Limousine Commission,

I attend Pratt Institute's Graduate Center for Planning and the Environment, pursuing a Master of Science graduate degree in the Sustainable Environmental Systems program. As a student and citizen who studies New York City's greenhouse gas inventories by sector, I want to commend your proposal for amending the existing vehicle specification rules governing non-accessible Medallion Taxicab Licenses vehicles in order to permit the use of fully-electric vehicles.

This decision furthers goals for ensuring healthy air quality for New Yorkers and helps to achieve the city's 2050 carbon neutrality targets by cutting greenhouse gas (GHG) emissions in the Transportation sector. According to the Mayor's Office of Climate and Environmental Justice, on-the-road vehicular GHG emissions from gasoline combustion make up [9.71 million metric tonnes of CO₂e \(MtCO₂e\) each year](#), making up the largest share of emissions from the transportation sector. Removing significant amounts of carbon emissions from the road will not only aid in the city's role fighting climate change, but will cut cardiovascular and respiratory disease rates among New Yorkers by removing toxic byproducts from combusting gasoline at the street level. Research from 2015-2017 by the city reported that though NYC's air quality is improving, fine particulate matter caused at least 2,000 deaths, 1,400 hospital admissions for lung and heart conditions, and 3,750 emergency department admissions for asthma.

A single yellow taxicab in New York City drives around 70,000 miles per year. With the [13,587 Yellow Medallion Taxis](#) authorized to accept street hails from passengers throughout the five boroughs, more than 338,000 MtCO₂e are sent into the atmosphere each year according to the Environmental Protection Agency's (EPA) [carbon calculator](#). Mayor Bloomberg laid the groundwork for transforming the city's taxi fleet in 2009 by mandating more energy efficient models that are able to drive at least 25 miles per gallon of gasoline. If New York City hopes to further its OneNYC 2050 targets, another transformation of its taxicab fleet will need to take place.

I highly recommend that the amendment to the existing vehicle specification rules achieve more than just removing a barrier to entry for fully-electric vehicles. I suggest the Commission consider fully electrifying its entire fleet of vehicles. With the passing of [Assembly Bill A4302](#) and [Senate Bill S2758](#), 100% of in-state sales of new passenger cars and trucks will be zero-emissions by 2035. Over the course of the next 10 years, the Commission can choose to retire gasoline-combusting taxis as the vehicles near the end of their useful lives. This phased approach leading up to the 2035 deadline will ease the time burden of vehicle switchover and allow the conversion to happen naturally at time-of-replacement.

A further consideration would be to extend this mandated electrification effort across for-hire vehicle industries, including app-based companies such as Uber and Lyft. The number of cars employed by car-hailing services like Uber and Lyft on New York City streets are almost 6x the amount of yellow taxicabs ([80,000 vehicles](#)). The amount of carbon emissions from these vehicles is also significantly higher. Including for-hire vehicle industries in electrification would further cut down on carbon emissions in the Transportation sector and have an even greater impact on health outcomes.

Sincerely,

Nia Starr