

# 400 & 500 State Street Block Association

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**Submitted via NYC Rules Portal and Email**

TruckRoutes@dot.nyc.gov

**Re: Public Comment on DOT Proposed Amendment of Rules Relating to Citywide Truck Routes**

**Comment Period Closes: June 9, 2026**

**Public Hearing: June 9, 2026**

**DOT Case Reference: DOT-735450-R8H4**

Dear Commissioner Flynn, Brooklyn Borough Commissioner Bray, and Members of the Department of Transportation:

The 400-500 State Street Block Association, together with 25 parents of children attending the Elizabeth Jennings School for Bold Explorers (PS K456), submits this public comment on the Department of Transportation's proposed amendment of rules relating to citywide truck routes. We urge DOT to use this rulemaking, as mandated by Local Law 171, to remove 3rd Avenue between Atlantic Avenue and Schermerhorn Street from the citywide truck route network. At a minimum, DOT should significantly restrict non-local through-truck traffic on that corridor. Our full letter to DOT dated February 9, 2026 is attached here and incorporated by reference.

## **I. Summary of the Block Association's Prior Letter to DOT**

In our February 9, 2026 letter we documented in detail why 3rd Avenue between Atlantic Avenue and Schermerhorn Street is unsafe and inappropriate as a through-truck corridor. The key points are as follows.

- **Changed Conditions.** Downtown Brooklyn has been transformed since the legacy truck route designations were made. The area now includes thousands of new

residential units, two new public schools (PS K456 and the Khalil Gibran International Academy, which was rebuilt) and the active construction of an 800-foot skyscraper at the corner of 3rd Avenue and State Street. The truck route network has not kept pace with these changes.

- **Illogical Zig-Zag Routing.** The severance of 4th Avenue northbound at Times Plaza, implemented around 2011 to benefit the Barclays Center developers, created a structurally flawed routing pattern with no documented public benefit. Trucks must turn left onto Atlantic Avenue, then right onto 3rd Avenue, then left onto Flatbush Avenue. Three complex turns within two blocks generate dangerous friction, block crosswalks, and trap emergency vehicles.
- **Emergency Response Delays.** FDNY Engine 226 on State Street is regularly blocked by queued truck traffic. Firefighters have been forced to exit the apparatus and manually direct traffic. We have observed this cause significant delays on at least three occasions.
- **Dangerous Turns onto State Street.** GPS routing systems direct large trucks, including 53-foot tractor-trailers, to turn right from 3rd Avenue onto narrow one-way State Street in order to reach southbound Flatbush Avenue. These trucks drive on curbs, block crosswalks, strike pedestrian infrastructure, and cannot make the turn without encroaching on sidewalk space. Blind spots on articulated trucks create serious risk to pedestrians including young schoolchildren.
- **Vision Zero and Bus Priority Conflicts.** The Schermerhorn Street and Flatbush Avenue intersection is already one of Brooklyn's most dangerous for pedestrians, and upstream truck routing funnels additional large vehicles directly into it. Bus priority on Flatbush Avenue cannot function if buses are trapped behind queued truck traffic generated by this illogical routing.
- **A Feasible Alternative Exists.** Routing Manhattan Bridge and BQE-bound trucks from Atlantic Avenue to the Boerum Place and Jay Street corridor and then to Tillary Street keeps large vehicles on wide arterials designed for them. Extended overnight and full-day weekend closures of 3rd Avenue by Alloy Development have already demonstrated that traffic adjusts without difficulty when this stretch is unavailable.

## II. DOT's Response and Why We Respectfully Disagree

Before addressing the substance of DOT's response, we must report an important development. DOT's May 7, 2026 response to our February letter cited the recent installation of a restrictive truck sign at the corner of 3rd Avenue and State Street as a remediation measure. **That sign was run over**

**and destroyed by a large truck making the very turn we have described and was only in place for about one day.** This is not the first time this has happened. As documented in Exhibit D of our February letter, signs at this location have been destroyed within one day of installation on multiple occasions. No sign can change the physical geometry of an intersection that large trucks simply cannot navigate safely. This pattern is the clearest possible evidence that signage alone is not a solution.

Turning to DOT's broader response, Borough Commissioner Bray wrote on May 7, 2026 that after several days of field observations, DOT's field operations and planning teams do not recommend removal of 3rd Avenue as a truck route. DOT cited existing turn restrictions elsewhere in the area and 3rd Avenue's role connecting Southwest Brooklyn commercial areas to Flatbush Avenue and the Manhattan Bridge. We respectfully but strongly disagree, for the following reasons.

- **Spot observations do not capture systemic conditions.** The safety problems we have documented are the predictable recurring result of routing highway-class freight vehicles through an incompatible residential and school corridor. A field team visiting on a particular day at a particular hour may not witness a crisis in progress. That does not mean the conditions are safe.
- **Conditions have worsened since we submitted our February letter.** Construction at One Third Avenue continues to intensify lane constraints and pedestrian congestion at this intersection. E-commerce delivery volumes remain high. GPS-driven routing of large trucks off the BQE continues. PS K456 is adding grades and its student population is growing rapidly. The situation our letter described has not improved.
- **The turn restrictions DOT cited as limiting truck options are part of the problem, not evidence against our position.** Those restrictions are what force trucks into the zig-zag pattern through 3rd Avenue and State Street in the first place. The appropriate response is to evaluate whether the Boerum Place and Tillary Street corridor should be formally designated as the alternative route, not to conclude that the absence of obvious alternatives justifies maintaining a dangerous designation.
- **We are not asking DOT to remove 3rd Avenue from the truck route network entirely.** We are asking only that the specific segment between Atlantic Avenue and Schermerhorn Street be rerouted. Under the alternative we propose, a northbound truck would make one turn onto Atlantic Avenue and one turn onto Boerum Place to reach Flatbush Avenue and the Manhattan Bridge. Under the current routing, that same truck makes a turn onto Atlantic Avenue, a turn onto 3rd Avenue, a turn onto Schermerhorn Street, and then a sharp turn onto Flatbush Avenue. The proposed route requires the same number of turns or fewer, depending on where the truck is coming from. More importantly, it keeps trucks moving in a straight line for

significantly longer between turns. DOT's own network design guidelines recognize that straight-line travel is preferable for freight vehicles. Therefore, the Boerum Place alternative is a better route by DOT's own criteria.

### **III. Updated Safety and Community Concerns**

#### *A. 53-Foot Trucks Are Operating Illegally in This Area*

At a recent Community Board meeting, DOT representatives confirmed that 53-foot tractor-trailers are prohibited from operating on New York City streets. This is consistent with NYC DOT's own published rules, which state that trucks with 53-foot trailers may only travel on portions of I-95, I-695, I-295, and I-495 crossing the city between the Bronx-Westchester County line and the Queens-Nassau County line. They are not permitted on local or through truck routes, including 3rd Avenue, regardless of whether those routes are otherwise designated for truck traffic. No permit exists that authorizes their use on city streets outside those specific interstate segments. NYS DOT's own guidance explains that this restriction was enacted specifically because 53-foot trailers were found to be unable to maneuver effectively on New York City streets. The daily scene at 3rd Avenue and State Street is a vivid confirmation of that finding, and we have dozens of photos that we attached to our February 9, 2026 letter that shows 53-foot trailers on our streets. We have many more photos and videos.

The 53-foot trucks we regularly observe on this corridor are not making local deliveries. They are using our residential streets to avoid BQE congestion. This is illegal under the City's own rules. DOT has directed us to seek enforcement from the NYPD. But if that is DOT's position, then DOT must equip officers to act on it. That means posting clear and durable signage identifying the vehicle length restriction, providing NYPD with formal training on when and how to identify and stop an oversized truck, and establishing a clear enforcement protocol. A community cannot be told to seek NYPD enforcement and then left without the tools that would make enforcement possible.

#### *B. Active Construction Has Made Conditions Significantly Worse*

The construction of One Third Avenue at the corner of 3rd Avenue and State Street is important to our neighborhood's future. But the reality today is that construction staging has narrowed 3rd Avenue to two small lanes. Large trucks, which should not be on this block at all, are now regularly driving on the sidewalk alongside cyclists, strollers, and pedestrians. This is not a temporary inconvenience. It is an ongoing daily hazard for everyone using this street. DOT approved the construction and the street configuration that resulted. DOT must address the truck routing that makes that configuration so dangerous.

### *C. Children at Risk*

PS K456 is still in its early enrollment phase and is adding grades each year. Pre-kindergarten and kindergarten children require hand-held escorts to and from school buses through a street environment where large trucks are mounting curbs and blocking crosswalks. As the school's population grows, the number of young children moving through this corridor during arrival and dismissal will increase significantly. The risk of a serious injury grows with each school year.

### *D. Flatbush Avenue Bus Lanes Will Be Severely Impacted*

DOT has committed significant resources to bus priority on Flatbush Avenue. New bus lanes are planned or underway at considerable public expense and construction has begun. Those lanes will be rendered nearly impassable if truck traffic continues to be routed as it is today. Trucks entering Flatbush Avenue too early, through the zig-zag from Atlantic Avenue to 3rd Avenue, create queues that trap buses and defeat the purpose of priority infrastructure. Trucks heading to Flatbush Avenue should be routed to enter it later, via Boerum Place and Tillary Street, so that the corridor functions as intended. Bus priority and the current truck routing cannot coexist.

### *E. Temple Square and the Future of This Neighborhood*

Alloy Development is creating Temple Square, a new public plaza at the corner of 3rd Avenue and Schermerhorn Street. This will be a genuine public amenity for the neighborhood. The vision of a welcoming public space is simply incompatible with 53-foot tractor-trailers rumbling past it on a daily basis. The City cannot invest in the public realm on one hand and route highway freight traffic through the same corner on the other. As this neighborhood continues to develop, the truck route designation becomes more inconsistent with everything the City says it wants this area to become.

## **IV. Requested Actions**

We urge DOT to take the following actions in connection with the proposed amendment to the citywide truck route rules.

- 1. Remove 3rd Avenue between Atlantic Avenue and Schermerhorn Street from the citywide truck route network, or formally restrict non-local through-truck traffic on this segment. Require trucks not making local deliveries to use the Boerum Place, Jay Street and Tillary Street corridor as the designated alternative route to the Manhattan Bridge and BQE.**
- 2. Formally designate Boerum Place as an interim or permanent truck route to provide a legal and appropriately designed alternative to 3rd Avenue for northbound freight traffic. Route trucks to enter Flatbush Avenue via Boerum**

**Place and Tillary Street rather than through the current zig-zag, so that the planned Flatbush Avenue bus lanes can function as intended.**

- 3. Provide NYPD with formal training on how to identify and stop 53-foot trucks operating illegally in this area, and install durable signage reflecting the length restrictions that already exist under City rules. If DOT's position is that enforcement is the answer, DOT must equip the officers who are being asked to enforce.**
- 4. Install physical street design improvements at 3rd Avenue and State Street, including curb extensions that reduce the turning radius available to large trucks and protect the pedestrian environment. Signage alone has repeatedly and dramatically failed at cost to the City and neighborhood.**
- 5. Coordinate with FDNY to document and address the impact of truck queuing on emergency response times at this location.**

## **V. Conclusion**

The rulemaking DOT has initiated is precisely the process Local Law 171 contemplated. It is a formal city-wide reassessment of the truck route network to improve safety, efficiency, and health outcomes. The conditions on 3rd Avenue between Atlantic Avenue and Schermerhorn Street fit squarely within the situations this process was designed to remedy. We have a residential and school corridor with inadequate geometry for heavy freight vehicles, documented emergency vehicle delays, children at risk, oversized trucks that are illegal on this street under the City's own rules, construction that has narrowed the road to the point where trucks are using the sidewalk, planned public investment in bus priority that the current routing will undermine, and a new public plaza that deserves better than a truck route running past it.

DOT's prior response cited the difficulty of rerouting trucks given existing constraints. We understand that routing changes do not occur in isolation. But the absence of an easy answer is not a reason to maintain a dangerous and illogical designation. It is a reason to do the planning work to create a better one. The Boerum Place, Jay Street and Tillary Street corridor is that better option. We urge DOT to formally evaluate and adopt it in this proceeding.

We are ready to walk this corridor with DOT staff during school hours, share additional documentation, and participate constructively in this process.

We ask that our February 9, 2026 letter and this comment be entered into the record and given full consideration. Thank you for your attention to this matter.

Respectfully submitted,

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*Attachment: 400-500 State Street Block Association Letter to DOT dated February 9, 2026 (with Exhibits A through D)*