

**Comments of Zach Miller
Vice President of Government Affairs
Trucking Association of New York**

Before the

**New York City Department of Transportation
Notice of Public Hearing and Opportunity to Comment on Proposed Rules**

Regarding

Truck Route Modernization

Good morning and thank you for the opportunity to share testimony. My name is Zach Miller, and I am the Vice President of Government Affairs for the Trucking Association of New York (TANY). Since 1932, TANY has advocated on behalf of the trucking industry at all levels of government, providing compliance assistance, safety programs, and educational opportunities to our members, and in the process, creating jobs, supporting the economy, driving safety, and delivering a sustainable future.

I appreciate the opportunity to testify today on the Truck Route Network Redesign mandated by Local Law 171. TANY is the voice of the trucking industry in New York, advocating for policies that advance safe, efficient, and sustainable freight movement. We engage regularly with the city, state, and federal agencies to ensure that freight infrastructure keeps pace with the demands of a growing, dynamic urban economy.

Freight Mobility Is Foundational to New York City

New York City's economy depends on freight. Over 90 percent of goods consumed in this city move by truck. Every meal served in a restaurant, every product on a store shelf, every piece of construction material at a job site arrives by truck. Freight is not background noise; it is the circulatory system of our economy.

With that in mind, TANY strongly supports the goals of this redesign. A modern, well-designed truck route network is essential to public safety, economic vitality, and quality of life for all New Yorkers. We commend the Office of Freight Mobility and the NYC DOT team for undertaking this comprehensive review and for engaging with stakeholders throughout the process.

Strong Support for the Proposed Network Expansion

The proposed net expansion of the truck route network, adding approximately 49 miles while removing 5.5 miles, represents a meaningful and pragmatic step forward. We are particularly encouraged by DOT's focus on improving connectivity to Industrial Business Zones and limited-access facilities.

TANY specifically and strongly supports the addition of the following routes:

- Nassau Expressway and JFK Expressway in Queens
- Korean War Veterans Parkway on Staten Island
- 2nd Avenue in Sunset Park, Brooklyn
- New Utrecht Avenue in Brooklyn
- 132nd Street and Rose Feiss Boulevard in Port Morris, Bronx
- Route additions within the Hunts Point and Maspeth Industrial Business Zones

JFK Airport and the Hunts Point Market are the two largest freight hubs in New York City and among the most critical economic engines in New York State. These additions reflect a data-driven understanding of where freight actually moves and what the network needs to accommodate future demand.

We are also particularly encouraged by the additions in Maspeth. The Maspeth–Long Island City–Greenpoint IBZ corridor is a vital hub for manufacturing, wholesale, industrial, and film production activity. Protecting and strengthening access to these areas is essential to preserving New York City’s industrial base.

Finally, while we have questions about certain assumptions surrounding the Brooklyn Marine Terminal, we are encouraged that NYC DOT is proactively planning for what will almost certainly be increased truck activity there. Ensuring the network is ready for that demand is exactly the right approach.

Recommendations for a Complete Freight Strategy

While we strongly support the core redesign, we urge the city to treat this as the foundation of a broader, more holistic freight strategy. A modernized route network is only as effective as the policies and infrastructure that surround it. To that end, we offer the following recommendations:

1. Unfreeze the Divisible Load Overweight Permit System

The expansion of the truck route network creates a clear opportunity to modernize the city’s long-frozen divisible load overweight permit system. Aligning permits with newly designated truck routes would improve compliance, reduce unnecessary mileage and emissions, and enhance operational efficiency. A modern network must be paired with a modern permitting framework.

2. Establish Designated Corridors for 53-Foot Trailers

We urge DOT to evaluate the feasibility of establishing clearly defined, limited-access corridors for 53-foot trailers tied to interstate movement, airport access, and IBZ connectivity. As regional supply chains continue to evolve, a corridor-based approach would align infrastructure with current freight realities while maintaining appropriate safeguards for residential and sensitive areas.

3. Implement Meaningful Curb Management and Truck Parking Reform

This is perhaps the most urgent complementary reform needed, particularly in Manhattan, where segments of the truck route network are being reduced even as microhubs and alternative delivery models are expanding. These models are a positive development, but only if the network can absorb them properly. The city must ensure:

- Adequate and enforceable commercial loading zones
- Expanded overnight and long-term truck parking options
- Clear integration between microhubs and legal truck staging areas

Without these reforms, drivers will continue to face operational constraints that make compliance difficult, even when following designated routes.

Conclusion

At its core, a truck route network should optimize freight movement through dense urban environments in a safe, efficient, and sustainable manner. The Truck Route Network Redesign moves the city meaningfully in that direction, and TANY is proud to support it.

These improvements deliver lasting benefits for safety, compliance, and economic vitality across all five boroughs. We respectfully urge the agency to finalize the proposed network expansion, and to move forward concurrently on the permitting, trailer corridor, and curb management reforms outlined in this testimony.

Thank you for the opportunity to comment. As always, the Trucking Association of New York looks forward to ongoing collaboration and dialogue with the Department of Transportation.