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Commissioner Mike Flynn
New York City Department of Transportation
55 Water Street
New York, NY 10041

Dear Commissioner Flynn,

Thank you for providing the opportunity to provide feedback on the proposed changes to the New York City Truck Route Network. While I appreciate the agency's effort to modernize freight movement across the five boroughs, the current proposal moves in the wrong direction by adding miles of truck routes to communities that are already overrun.

The redesign was originally intended to enhance safety, reduce congestion, and improve freight movement, but the resulting proposal falls far short of that mandate. The plan as offered is not a true redesign, but a largely status-quo map that adds new routes to neighborhoods already overburdened by industrial traffic and last-mile warehouse proliferation, and dramatically alters a portion of the route in southern Brooklyn in a way that will make our streets less safe.

I urge DOT to reconsider this proposal and put additional thought into how we can truly redesign our out-of-date truck routes, to put additional emphasis on alternatives such as cargo bikes and the blue highway, and to work with communities to understand the realities of the road. In addition, I want to highlight specific areas of my district impacted by the plan that deserve immediate attention and changes.

3rd Avenue and 86th Street

After reviewing concerns voiced by Brooklyn Community Board 10 and calls received by our office from Bay Ridge constituents, I strongly recommend that the DOT does not expand the Truck Route Network along 3rd Avenue and 86th Street, which would have negative impacts on businesses and residents in the area:

1. **Increased congestion:** The proposed changes to the Truck Route Network would increase congestion along the residential and small business corridor by diverting truck traffic in Bay Ridge from 7th Avenue and funneling it to 3rd Avenue and 86th street. As noted in DOT's 2025 Truck Redesign Report, a vast majority of freight trips in Bay Ridge begin along the already-existing Truck Route Network on 7th Avenue. The proposed 3rd Avenue extension would create more congestion as operators use the route to bypass traffic on 7th Avenue. The proposed

routes on 3rd Avenue and 86th Street do not connect substantial freight-generating areas that do not already have a truck route. Further, adding 86th Street to the Truck Route Network increases the likelihood of operators making illegal turns onto local streets, which risks causing traffic jams and collisions when operators struggle to make the turn. Third Avenue between 65th Street and 86th Street, and 86th Street between Fort Hamilton Parkway and 3rd Avenue, host a diversity of street users that would conflict with increased truck congestion, including residential buildings, schools, first floor businesses, restaurants, delivery workers, and many outdoor dining permitted establishments.

2. **Safety risks:** Adding a truck route to an avenue with such a wide variety in modes of transportation and infrastructure creates a dangerous environment for all street users, contradicting the goals of Vision Zero. Trucks with large loads and slow braking times interacting with bus stops, school crossings, shared bike lanes, delivery workers, pedestrians, and children will significantly increase the likelihood of collisions along 3rd Avenue and 86th Street. Turning these roadways into truck routes risks hindering future Vision Zero efforts by DOT and the community to create safer streets by prioritizing truck movement over other modes of transportation, including walking, cycling, and public transit.
3. **Business impact:** The safety and congestion risks described above will negatively impact businesses along 3rd Avenue and 86th Street by creating an unpleasant street environment and increasing travel times for potential customers. Outdoor dining would be especially affected by the increase in truck traffic, but all businesses will be impacted by the noise and exhaust pollution.

I urge DOT to reject the proposed expansion of the Truck Route Network along 3rd Avenue and 86th Street. This expansion would increase congestion without meaningfully improving freight access, undermine years of Vision Zero progress, and damage the economic vitality of one of Brooklyn's most vibrant neighborhood corridors.

3rd Avenue between Atlantic Avenue and Schermerhorn Street

After reviewing feedback from the 400 & 500 State Street Block Association and calls received by our office from Downtown Brooklyn constituents, I recommend that the DOT take a closer look at redesigning the Truck Route Network on 3rd Avenue between Atlantic Avenue and Schermerhorn Street, where truck operators frequently make illegal turns onto State Street, are forced into difficult consecutive turns in opposite directions to travel from 4th Avenue to Flatbush Avenue, and encounter other issues listed here:

1. **State Street congestion:** My office has worked with constituents from the 400 & 500 State Street Block Association on the issue of chronic truck traffic, which occurs when truck operators' GPS route them onto State Street from 3rd Avenue, which is illegal under proposed and previous Truck Route Network rules. This issue has persisted despite the posting of multiple "no truck traffic" signs and walkthroughs with my office, the 400 & 500 State Street Block Association, DOT, and

NYPD.

2. **Emergency vehicle congestion on State Street:** State Street residents have informed our office of multiple occasions in which FDNY has been stuck behind trucks illegally traveling on State Street, prohibiting emergency vehicles from passing.
3. **Increased residential and educational activity on State Street:** State Street has seen a growth in development since the last Truck Route redesign. Specifically, the construction of additional housing and two public schools (PS K456 and the Khalil Gibran International Academy), have increased the number of children using State Street and the surrounding area. Trucks illegally using State Street create an unsafe environment for children and increase the risk of collisions.
4. **Snaking route with difficult turns:** Trucks traveling north on 4th Avenue are forced to take a snaking route—with multiple turns in opposite directions—in order to access Flatbush Avenue and the Manhattan Bridge. These zig-zagging turns, along with the narrow dimensions of 3rd Avenue between Atlantic Avenue and Schermerhorn Street, create a situation that often results in operators getting stuck. This creates traffic on Atlantic Avenue, 3rd Avenue, State Street, and Schermerhorn Street.

I urge DOT to take a comprehensive look at the Truck Route Network on 3rd Avenue between Atlantic Avenue and Schermerhorn Street, with the goal of redesigning it in a way that reflects current street conditions and anticipates future uses. The persistent illegal truck traffic on State Street—despite signage, community outreach, and interagency walkthroughs—demonstrates that the existing route exacerbates negative behaviors by operators. Meanwhile, the increase in residential development and the addition of two public schools have made State Street a more vulnerable corridor than it was at the time of the last redesign. The inefficient snaking route that sends trucks through narrow, difficult intersections creates a dangerous streetscape that deserves further study and community outreach.

2nd Avenue between 29th Street and 58th Street


Based on concerns raised by multiple constituents and members of Brooklyn Community Board 7, I urge DOT to reconsider the addition of 2nd Avenue between 29th Street and 58th Street to the Truck Route Network. I also encourage the agency to consider long term safety improvements along 3rd Avenue. Adding another truck route to an already-congested area that suffers from pollution and dangerous driving is unwise for the reasons listed below:

1. **Proximity to residential streets:** The blocks from 29th Street to 58th Street between 2nd Avenue and 3rd Avenue are overwhelmingly made up of residential buildings with close proximity to the street. Adding 2nd Avenue to the Truck Route Network would create more opportunities for operators to turn onto these residential streets in order to bypass traffic on 2nd Avenue and 3rd Avenue. In comparison, the blocks from 29th Street to 58th Street between 1st Avenue and 2nd Avenue are made up of mostly industrial and warehouse uses that would be less impacted by truck traffic.

- 2. NYU Langone and 2nd Avenue as an emergency thoroughfare:** My office has received multiple complaints of chronic traffic buildup due to double-parked ambulances at NYU Langone Brooklyn on 55th Street and 2nd Avenue. We have spoken to the NYPD, who have informed us that the vehicles must be parked out front of the hospital to ensure quick emergency response times. An increase in truck usage there will exacerbate congestion on 2nd Avenue and 55th Street, and risks slowing emergency response times. Emergency vehicles traveling to NYU Langone Brooklyn from the BQE use 2nd Avenue as an emergency thoroughfare, which could create dangerous situations where vehicles get stuck behind truck traffic and patients are not able to receive the care they need.
- 3. Double parking and unloading vehicles:** Because of its narrow street geometry, double-parked and unloading vehicles currently cause traffic buildup on 2nd Avenue. Forcing large trucks to navigate through double parked cars and other large vehicles will create larger traffic jams.
- 4. Pedestrian usage of 2nd Avenue compared to 1st Avenue:** Adding 2nd Avenue to the New York City Truck Route Network will create more conflict with pedestrians and businesses than alternative options. 2nd Avenue is a diverse thoroughfare with commercial, industrial, and residential uses on the same street. As a result, 2nd Avenue has significantly more foot traffic than 1st Avenue, just one block west.

I urge DOT to pursue alternatives to the proposed addition of 2nd Avenue between 29th Street and 58th Street to the Truck Route Network. The case against 2nd Avenue is compelling on multiple fronts: it runs through a densely residential area with vulnerable side streets, serves as a critical emergency thoroughfare for NYU Langone Brooklyn, suffers from existing congestion due to narrow street geometry and chronic double parking, and carries significantly more pedestrian activity than the available alternative one block away. Adding truck traffic to 2nd Avenue while maintaining 3rd Avenue would worsen all of these existing conditions without offering a meaningful benefit. I ask that DOT seriously evaluate 1st Avenue as a viable, safer alternative, and engage with Community Board 7 and local residents before finalizing any changes to this corridor.

Sincerely,



Andrew Gounardes
New York State Senator
26th State Senate District