



Thomas Regan-Lefebvre
Coordinator
Transport Hartford Academy
Center for Latino Progress
95-97 Park Street Hartford
CT 06106
Thomas_lefebvre@ctprf.org

To

NESCAUM
89 South St #602,
Boston, MA 02111

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My name is Thomas Regan-Lefebvre and I am the coordinator at the Transport Hartford Academy at the Center for Latino Progress. We are advocates for modes of transportation which are environmentally sustainable, equitable, and accessible.

As presented, the Plan is a step in the right direction but lacks the ambition needed to address air quality, Vehicle Miles Travelled reduction, and transition to zero-emission transportation. Mainly:

- The plan does not propose a timetable to phase out ICE MHDs. As initiated by the Clean Air Act in CT for school buses, we suggest that NESCAUM proposes to phase out all ICE MHDs in Environmental Justice Communities by 2030 and 2035 in the state. If there is no phasing out timetable, MHD operators can keep using their ICE trucks forever.
- There is no mention of enforcement. At the moment, and incomprehensively, the CT DMV does not test MHD vehicles. We suggest that NESCAUM includes mandating emissions testing by state police forces, like in the rest of the developed world on top of annual testing by DMVs for complying with California MHD emissions standards.
- Banning heavy-duty trucks from cities should be a priority. Heavy Duty trucks, on top of their emissions, are particularly lethal to vulnerable road users and are mostly impractical in dense urban areas. The alternative, which is in operation in many countries, is to have goods being transferred to smaller vehicles at the periphery of cities.
- There are no proposals to reduce the overall numbers of MHD vehicles operating. The goal should be to shift modes transportation from roads to rail and maritime/waterway transportation.

Many thanks for giving the public the opportunity to submit comments to your draft plan.

I remain at your disposal for any questions.

Sincerely,

Thomas Regan-Lefebvre