Trucking Association of New York Information Sheet

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INDIRECT SOURCE RULE (ISR)

The Indirect Source Rule (ISR) (S.1180-B / A.3575-B) would impose penalties on owners or operators of warehouses, distribution centers, and logistics facilities based on the number and type of trucks serving those facilities. Compliance credits are provided only for zero-emission vehicles (ZEVs).

While framed as an emissions-reduction strategy, ISR functions in practice as a de facto zero-emission truck mandate — shifting responsibility for mobile-source emissions onto facilities and, ultimately, the freight transportation system.

Independent analysis of California's warehouse ISR program found that many of the claimed emission reductions are attributable to existing truck regulations (including a Clean Fuel Standard) rather than the ISR itself, while compliance costs for warehouses could be **2.4 to 9.4 times higher than originally projected**, raising concerns the policy functions more like a tax than an emissions program.

ISR would apply broadly using a 50,000-square-foot threshold, capturing thousands of small- and mid-sized facilities statewide. It retroactively imposes operational penalties unrelated to land-use approvals or historical compliance, creating regulatory uncertainty.

KEY ISSUES

1. Higher Operating Costs & Supply Chain Pass-Through
2. Limited Equipment Availability
3. Infrastructure Gaps
4. Interstate Commerce & Emissions Leakage
5. Failure to Recognize Clean Fuel & Near-Term Alternatives
6. Long-Term Planning & Zoning Impacts
7. Disproportionate Harm to Small & Mid-Sized Carriers
8. Fragmented & Inconsistent Regulation

ISSUE STATUS

Passed in the Senate. Reported to Assembly Ways and Means.

TANY POSITION

While we support practical, balanced approaches to improving air quality, the ISR places responsibility on businesses and trucking companies for factors largely outside of our control, including equipment availability, infrastructure limitations, and the pace of technology development. The rule would effectively function as a punitive mandate on the goods-movement sector without providing the tools, funding, or flexibility needed to comply in a realistic way.

HOW YOU CAN HELP – Oppose Legislation



TANY is urging lawmakers to oppose S.1180-B (Ginaris)/A.3575-B (Mitaynes), which would enact an Indirect Source Rule (ISR), and to urge you to oppose its advancement.

About TANY

Since 1932, the **Trucking Association of New York (TANY)** has advocated for the trucking industry at all levels of government, providing compliance assistance, safety programs, and educational opportunities. Our nearly 550 member companies support good jobs, economic vitality, roadway safety, and a sustainable future for New York.

Prepared by the Trucking Association of New York for legislative consideration.