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Executive Summary

The rise of e-commerce has led to an exponential increase in the volume of freight and package deliveries in New York City. In 2019, there were more than 1.8 million packages delivered across the five boroughs every day, up from 1.1 million in 2017. The pandemic accelerated this trend. By 2021, daily e-commerce deliveries surged to 2.3 million per day – a 109% increase over four years. To meet this demand, companies like Amazon and FedEx have established warehouses across the city to fulfill and dispatch orders to delivery trucks that take packages to their destinations. As of 2024, the number of packages delivered per day has reached 2.5 million. This indicates that nearly one third of New Yorkers receive packages on a daily basis.

The logistics of delivering millions of packages in a dense, urban environment has profoundly impacted New York City. Many new "last mile" facilities, or warehouses for sorting and dispatching packages directly their final destinations, opened over the past ten years to accommodate the e-commerce boom with much of this growth taking place during the early pandemic years. Unlike traditional or "middle-mile" warehouses, last mile facilities are located in more densely populated areas, in proximity to customers' homes and popular package destinations. Fulfilling millions of orders each day requires thousands of truck trips, 24/7 operations, and large amounts of space to stock and sort through packages, especially as companies increasingly promise two-day delivery. The high volume of local deliveries has led to increased truck traffic and crashes, congestion, and air quality problems, particularly in communities designated as environmental justice priority areas.

Sorting, packing, and delivering orders also requires a large labor force, and last mile facilities employ thousands of workers. This includes workers located within warehouses responsible for receiving and sorting products, moving products onto delivery vehicles, providing maintenance of the warehouse and vehicles, recording shipment data, and supervisors of warehouse operations along with personnel responsible for delivering packages to their final destinations, including those responsible for driving the delivery vehicles and loading packages onto courier carts to bring them directly to businesses, apartments and houses. There has been a significant increase in New York City of these types of jobs, with one estimate of the larger e-commerce industry found that in 2024, there were approximately 45,400 workers in NYC, an 84% increase since 2014. On the employer-side of last mile delivery, the primary three operators of industry are Amazon, FedEx, and UPS, with much of the recent growth attributable to Amazon.³

Nearly six years after the outbreak of the pandemic, the growth of the e-commerce and delivery industry continues to outpace regulation. City agencies are still catching up when it comes to managing the traffic, labor, and safety impacts of the delivery industry on New York City. This report analyzes data on the traffic and labor impacts of last mile facilities, reviews the local regulatory landscape and challenges around mitigating these impacts, and offers recommendations for improving the industry's sustainability and safety profile.

Key Findings

Traffic Crashes

- Last mile package distribution facilities have rapidly expanded across New York City: Since 2017, 18 such large facilities have opened across New York City—11 of them since 2020, driven by the pandemic-era e-commerce boom.
- Traffic crashes and injuries have increased in areas near last mile facilities: After these facilities opened, 78% of nearby areas saw more injury-causing crashes, with injuries within a half-mile radius rising by an average of 16%. Truck-related crashes increased by 146%, and truck-injury crashes rose by 137%.
- Traffic safety data reveals hot spots for crashes: In Maspeth, Queens, crashes near two major FedEx and Amazon warehouses rose by 53% and 48%, respectively. A cluster of four East New York facilities also saw a sharp increase in crashes within a half-mile radius.

Air Quality & Environmental Justice

- Last mile facilities are concentrated in environmental justice communities: 68% of last mile warehouses are located in officially designated Environmental Justice (EJ) Areas, including Red Hook, East New York, Maspeth, and Hunts Point. 67% of residents in these neighborhoods are Black or Hispanic, compared to 49.2% citywide, and already face higher levels of air pollution.
- Warehouse-dense areas experience poorer air quality: Health Department data show that neighborhoods like Newtown Creek, Red Hook, Sunset Park, and Hunts Point have notably higher air pollution levels, likely tied to truck congestion and industrial activity.

Worker Safety

- There is a worker injury crisis among last mile facility employees: Between 2022 and 2024, 38 of 50 facilities (76%) identified by the New York City Department of City Planning reported injuries to the Occupational Safety and Health Administration (OSHA), totaling over 2,000 injuries, or an average of 678 per year. Injury rates per 100 employees at last mile facilities are more than triple the national average for all private employers (8.3 vs. 2.4).
- Severe injuries are common: 85% of reported injuries led to time away from work or reassignment, with a median of 60 days for 2023 and 69 days in 2024.

- Days Away or Restricted, or Transferred (DART) rates for last mile delivery employees are high: While all workplace injuries are notable, a key indicator for measuring the severity of injuries is if an injury resulted in a worker being unable to return to work or transferred to less physically intense work assignments; Days Away or Restricted, or Transferred (DART). The rate of DART injuries per 100 workers (DART rate) (7.2) is nearly five times higher than the national average (1.5).
- Two individual last mile facilities had particularly high worker injury rates: Two FedEx facilities in Brooklyn recorded **DART rates above 20**, among the highest of any in New York City's logistics sector.
- Amazon's delivery contractor model has some of the highest rates of workplace injuries: Amazon's Delivery Service Partner (DSP) program—comprising dozens of subcontracted firms— in 2023 and 2024 had an injury rate per 100 employees of 9.2 and a DART rate of 8.1, exceeding those of the greater last mile and courier industries.

Regulatory Challenges

New York City faces a complex and fragmented regulatory landscape in managing the explosive growth of the e-commerce and last mile delivery industries. Last mile warehouses remain largely unregulated, having proliferated as-of-right in industrial areas, often adjacent to residential neighborhoods, without environmental review, public input, or City Council approval. Significant challenges stem from limited local authority over truck emissions, a subcontracted labor model that obscures accountability, and a federal rollback of environmental and labor protections. Thoughtfully navigating the following challenges is essential to designing and implementing effective regulations on the industry:

- Emissions linked to warehouses come from trucks and other mobile sources of
 pollution that are more challenging for cities and states to regulate than direct
 sources. Warehouse-related pollution is driven primarily by diesel trucks, which are
 classified as mobile sources under federal law. Cities cannot directly regulate these
 emissions and must instead rely on indirect tools like zoning, incentives, and fleet
 electrification programs.
- 2. Major corporations such as Amazon have built vast networks of subcontractors and "Delivery Service Partners," making it difficult for local agencies to enforce fair labor standards or worker protections. These challenges are compounded by a federal government that has weakened both labor and environmental oversight, leaving cities like New York to shoulder the responsibility for protecting public health, climate goals, and workers' rights on their own.
- 3. A federal government hostile to environmental and labor regulation is undermining efforts to improve sustainability and enforce workers' rights. The

federal government's current regulatory posture has significantly weakened environmental safeguards and labor protections.

- 4. The City lacked meaningful oversight over the delivery industry during the growth in warehouses in the early pandemic years, leaving agencies in the position of retroactively developing and applying regulations to these facilities. Without meaningful oversight during the initial warehouse boom, the City and New York City Council have been left in the position of retroactively developing and applying regulations to facilities that have already reshaped neighborhood conditions and public health.
- 5. Existing freight and delivery management initiatives launched by the New York City Department of Transportation (NYC DOT) are too small in scale relative to the volume of package deliveries in the city. NYC DOT has launched innovative pilot programs such as LockerNYC, microhubs, neighborhood loading zones, Blue Highways, and the Cargo Bike Pilot, and expanded the NYC Clean Trucks Program, but these remain small in scale and disconnected from broader zoning, labor, and environmental frameworks.
- 6. No single coordinating entity exists to oversee the package, freight, and food delivery sectors. Recent City efforts have focused narrowly on food delivery workers, while neglecting to regulate the logistics companies and warehouse operators driving unsafe conditions, emissions, and traffic.

To address these intersecting challenges, New York City needs a comprehensive, crossagency regulatory framework that integrates zoning reform, labor enforcement, emissions reduction, and freight planning to ensure that the economic growth of the delivery sector does not come at the expense of public health, safety, and equity.

Summary of Recommendations

The City can improve the safety, public health, and labor outcomes associated with the freight and last mile industry by advancing the following recommendations:

- 1. Pass the Delivery Protection Act (Intro 1396) to establish labor standards to mitigate occupational injuries among workers in the last mile delivery system, via a New York City Department of Consumer and Worker Protection-administered licensing program. The licensing program would also require employers to directly employ workers engaged in "core services" such as transporting or delivering packages to New York City residents.
- Pass and implement an indirect source rule for New York City-based warehouses (Intro 1130) to regulate mobile sources of pollution linked to last mile facilities. Currently undergoing environmental review, the proposed indirect source rule would require warehouse operators to meet a set of emission-reduction

- targets by earning points from a menu of options such as investing in electric trucks, installing EV charging infrastructure, or shifting a share of deliveries to cargo bikes or other low-emission vehicles.
- 3. Finalize the Department of City Planning's Last Mile Facility Text Amendment to end as-of-right development for warehouses and prevent further concentration of these facilities in environmental justice neighborhoods.
- 4. **Scale up the City's existing freight management programs** to improve the efficiency and sustainability of package delivery throughout the city. The City should focus on expanding successful initiatives like the commercial cargo bike program, the Smart Curbs pilot, and neighborhood loading zones in partnership and dialogue with workers involved in freight operations.
- 5. Increase incentives and proactive outreach for the NYC Clean Trucks Program to electrify the city's freight sector and maximize air quality and public health benefits in communities disproportionately impacted by truck traffic.
- 6. Establish a coordinating entity to oversee the regulation of the delivery industry, covering both last mile facilities and delivery apps. This entity would oversee cross-agency efforts around zoning reform, labor enforcement, emissions reduction, and freight planning to improve safety and equity outcomes.

Data Analysis

Residents of neighborhoods where last mile facilities are located report increased traffic, noise, and pollution from trucks. Simultaneously, the poor working conditions among contractors at these facilities has been a high-profile labor issue for many years. Since 2017, 18 last mile facilities opened across New York City. 11 of these facilities opened in 2020 or later, a result of the growth in e-commerce driven by the pandemic. This report uses publicly available data about traffic safety and labor violations to verify the impacts of these new facilities.

Crashes and Street Safety

Traffic crashes, injuries, and injuries from crashes involving trucks have all increased in areas close to new last mile facilities.¹

Traffic safety data collected by the New York City Police Department (NYPD) demonstrates that vehicle crashes and injuries are increasing in areas within a 0.5-mile radius of last mile facilities. 18 new facilities opened between 2017 and 2022, all of which were 50,000 square feet or larger. An analysis of traffic crashes reveals that 14 of these sites (78%) saw an increase in injury-causing crashes after the opening of a last mile warehouse, with the total number of injuries within a 0.5-mile radius of a facility increasing by an average of 16% across all sites (Table 1). The total number of individuals injured by crashes near last mile facilities increased by 15% on average.

Many of the locations experiencing large increases in crashes are areas where multiple last mile facilities exist in close proximity to each other. The average number of annual crashes near two FedEx- and Amazon-operated warehouses in Maspeth, Queens went up by 53% and 48%, respectively. A cluster of four facilities in East New York also saw large increases in crashes within a half mile radius. Across the 14 warehouses that experienced an increase in crashes nearby, 10 saw increases of 10% or higher.

¹ This analysis examines trends in the number of traffic crashes and injuries within a half-mile radius of new last mile warehouses in New York City, using publicly available crash data. This data and analysis does not attribute individual crashes to vehicles connected to any last mile facilities.

Table 1: Average Number of Crashes Near Last Mile Facilities Before and After Opening

Facility Address	Borough	Operator	Year Opened	Avg Crashes Pre-Open	Avg Crashes Post-Open
48-00 Grand Avenue	Queens	FedEx	2022	56	85
55-15 Grand Avenue	Queens	Amazon	2022	47	69
1300 Viele Ave	Bronx	Amazon	2019	23	32
270 Richards Street	Brooklyn	Amazon	2022	17	23
12555 Flatlands Avenue	Brooklyn	Amazon	2021	74	100
800 Bank Street	Brooklyn	UPS	2017	132	171
511 Barry Street	Bronx	Amazon	2021	96	120
2300 Linden Boulevard	Brooklyn	Amazon	2020	154	186
66-26 Metropolitan Avenue	Queens	Amazon	2020	49	54
706 11th Avenue	Manhattan	Amazon	2021	178	195
50-02 55th Avenue	Queens	UPS	2018	92	99
57-47 47th Street	Queens	OnTrac	2020	33	36
46-06 57th Avenue	Queens	FedEx	2018	40	42

Facility Address	Borough	Operator	Year Opened	Avg Crashes Pre-Open	Avg Crashes Post-Open
1055 Bronx River Avenue	Bronx	Amazon	2020	208	214
88-36 77 Avenue	Queens	CDL	2019	95	92
26-15 Boody Street	Queens	Amazon	2019	95	88
566 Gulf Avenue	Staten Island	Amazon	2019	14	13
1500 Bassett Avenue	Bronx	Amazon	2020	66	52

Crashes involving trucks also increased sharply near warehouses. Across the 18 new sites, truck crashes increased by an average of 146%. This is likely attributable to the large volume of truck traffic large last mile facilities can generate. Facilities of the size and scale common in New York City can see up to 1,000 truck trips per day. ⁴ 13 of the 18 sites analyzed experienced multiple injuries as the result of truck crashes. At these sites, injury-causing crashes involving trucks increased by an average of 137% following the opening of a last mile facility.

Environmental Justice and Air Quality

The environmental and traffic safety impacts of last mile facilities disproportionately burden communities of color and Environmental Justice Areas, due to the concentration of warehouses in these locations.

An analysis of neighborhood demographics demonstrates that communities of color are more likely to experience the traffic burdens associated with last mile facilities. Areas within a half mile of warehouses where crashes are increasing have higher proportions of Black and Hispanic residents (67%) than the city overall (49%). Last mile facilities are clustered in a handful of neighborhoods like Red Hook, East New York, and Maspeth. The City designates these communities as environmental justice areas, meaning they experience a disproportionate level of pollution while lacking access to environmentally beneficial amenities like parks and open spaces.

Across the entire city, 68% of last mile warehouses are within a New York City Environmental Justice Advisory Board-designated Environmental Justice Area (EJ Area). Across the five boroughs, the odds of living within a half-mile of a warehouse are increased by 17% for Black

residents; 13% for Hispanic/Latinx residents; and 19% for low-income residents. The concentration of last mile facilities in these neighborhoods points to the need for regulations to mitigate the traffic and environmental burdens they pose.

In addition to the growing volumes of vehicle traffic and crashes, there is an established link between last mile facilities and poor air quality in New York City's environmental justice neighborhoods. Data from the Health Department's New York City Community Air Survey demonstrates that areas with a density of warehouses, such as Newtown Creek area in Queens and Brooklyn, Red Hook/Sunset Park in Brooklyn and Hunts Point in the Bronx, have higher levels of air pollution.⁵ As stated by the Health Department, this is likely attributable to increased truck traffic and congestion, noise pollution, and air pollution from warehouses and industrial operations in surrounding areas.⁶

Occupational Injuries and Worker Safety

Last Mile Facilities

At last mile facilities in New York City, from 2022 to 2024, there were over 8 injuries per 100 workers, with the vast majority, around 85% being serious enough to result in missed workdays or restrictions on job duties.

Data from the Occupational Safety and Health Administration (OSHA)'s Injury Tracking Application (ITA) reveals that there is a significant number of occupational injuries at last mile facilities. The rate of injuries in these facilities is higher than national and state rates for private sector workers and equivalent employers in New York City and State's courier industry.

Federal law requires that employers with 20 or more employees report all work-related injuries or illnesses. For the years 2022 to 2024, 38 of 50 (76%) of last mile facilities identified by the New York City Department of City Planning (DCP) reported workplace injuries to OSHA in at least one of these years. ²

As seen in Table 2, over 2,000 workplace injuries were reported across all DCP identified last mile facilities from 2022 to 2024, with an average of 678 injuries per year. In looking at the total recordable incident rate (TRIR), capturing the frequency of injuries per 100 full-time equivalent (FTE) employees³, these facilities ranged from a low of 8 in 2024 to a high of 8.5 in 2023. For the full three-year period of 2022 to 2024, the TRIR was 8.3.

² See Appendix for the full list of facilities that reported injuries.

³ An estimation for the number of employees based on the number of reported hours worked, see Methodology for more information.

Comparatively, this rate was much higher than the 2023 TRIRs⁴, the most recent year with available data, for all private sector employers nationally, 2.4, and in New York State, 2.1.^{8 9} The TRIR for these facilities was also above New York State's rate for the courier industry as a whole⁵, which was 7.2 in 2023.¹⁰ Furthermore, as seen in Figure 1, the TRIR for last mile facilities was slightly higher than the rate for all other New York City establishments in the industry, with the largest divergence being in 2022.

While all workplace injuries are notable, a key indicator for measuring the severity of injuries is if an injury resulted in a worker being unable to return to work or be transferred to less physically intense work assignments; Days Away or Restricted or Transferred (DART). Notably, the vast majority of injuries at last mile facilities are DART cases. As seen in Table 2, among all injuries between 2022 and 2024, 87% were DART cases. Furthermore, the median number of DART days for 2023 and 2024, the only years where this data was available, was 60 and 69, respectively. In looking at the DART rate, the frequency of DART cases per 100 FTEs, these facilities ranged from a low of 7 in 2022 and 2024 to a high of 7.6 in 2023. Over the full period of 2022 to 2024, the DART rate was 7.2.

Comparatively, this rate was much higher than the DART rates in 2023⁶, the most recent year with available data, for all private sector employers nationally, 1.5, and in New York State,1.2.¹¹
¹² The DART rate for these facilities was also above New York State's rate for the courier industry as a whole⁷, which was 5.2 in 2023. ¹³ Furthermore, as seen in Figure 2, the DART rate for last mile facilities was slightly higher than the rate for all New York City establishments in the industry from 2022 to 2024.

Table 2: Reported Injuries at Last Mile Facilities, New York City 2020-2024

Year	Number of Facilities Reporting Data	Number of FTEs	Total Number of Injuries and Illnesses	Total DART Cases	TRIR	DART Rate
2022	34	9,070	758	635	8.4	7.0

⁴ Per 100 FTEs.

⁵North American Industry Classification System (NAICS Code) 492, Couriers and Messengers.

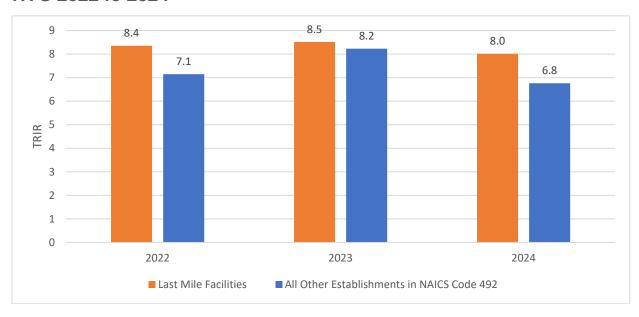
⁶ Per 100 FTEs.

⁷North American Industry Classification System (NAICS Code) 492, Couriers and Messengers.

Year	Number of Facilities Reporting Data	Number of FTEs	Total Number of Injuries and Illnesses	Total DART Cases	TRIR	DART Rate
2023	35	8,150	694	619	8.5	7.6
2024	35	7,277	583	507	8.0	7.0

Source: Occupational Safety and Health Administration, Injury Tracking Application (ITA) Data, Summary Data

Figure 1: TRIRs for Last Mile Facilities and the Larger Courier Industry, NYC 2022 to 2024



8.0 7.6 7.4 7.0 7.0 7.0 6.1 6.1 6.0 DART Rate 0.0 0.5 5.0 2.0 1.0 0.0 2022 2023 2024 ■ Last Mile Facilities ■ All Other Establishments in NAICS Code 492

Figure 2: DART Rates for Last Mile Facilities and the Larger Courier Industry, NYC 2022 to 2024

Source: Occupational Safety and Health Administration, Injury Tracking Application (ITA) Data, Summary Data

Regarding individual last mile facilities, two specific facilities stand out for the frequency of serious injuries; both of which are operated by FedEx and are located in the same section of Brooklyn. Higher than all other facilities, both facilities had a DART rate per 100 FTEs in 2024 that was above 20 and a DART rate per 100 FTEs for the full period of 2022 to 2024 of over 14. This includes the FedEx Ground facility located at 570 E 108 Street in Canarsie, and the FedEx Home Delivery facility located at 830 Fountain Avenue in East New York. The former had a DART rate in 2024 of 22.9 and a DART rate for the period of 2022 to 2024 of 15.3. The latter had a 2024 DART rate of 21.4 and a DART rate of 14.7 for the period of 2022 to 2024.

For all identified last mile employers in the ITA data, the employees who were injured include workers inside these facilities, such as those who sort packages and couriers who deliver the packages to customers via various types of vehicles. Notably, Amazon, unlike the other two major last mile companies (UPS and FedEx), did not report any injuries to workers in the latter category, which is likely related to the lack of direct employment of drivers by the company.

Delivery Service Partners

⁸ For 2023 and 2024, where detailed data that listed out the individual occupations of the injured workers was available.

Amazon's Delivery Service Partner (DSP) program—comprising dozens of subcontracted firms— had a reported injury rate of over 9 injuries per 100 workers, exceeding those of the greater last mile and courier industries.

Launched in 2018, Amazon's Delivery Service Partner (DSP) program is a contracting program launched by the company, with the self-reported aim of enabling individuals to "own and operate [their own] package-delivery business." ¹⁴ Individual companies submit applications to Amazon to become DSPs, and if selected, "they load packages into their vehicles and deliver them to customers' homes and businesses... [from Amazon] delivery stations." ¹⁵ Just as Amazon selects couriers to be DSPs, Amazon can unilaterally terminate contracts with individual DSP providers, as they are not designated by Amazon as franchises. ¹⁶ An example of this happened in New York City, when Amazon terminated Cornucopia's DSP contract in September 2025, resulting in 150 workers losing their jobs, who beforehand had voted to unionize with the International Brotherhood of Teamsters. ¹⁷

As of 2024, it was self-reported by Amazon that there were 4,400 DSP owners, delivering 20 million packages a day to 19 different countries. ¹⁸ Despite individual DSPs being 3rd party companies, investigative reports and lawsuits have alleged that Amazon "retains power over nearly every [non-compensation or vehicle maintenance] aspect of these drivers' jobs." ¹⁹ Amazon sets delivery standards, such as routes and deadlines, and DSP prices, along with providing DSPs with surveillance and metric tracking tools to monitor driver performance, on-the-road support, driver training, and resources for prospective DSP owners on how to apply to and operate a DSP program. ²⁰ ²¹ ²² In many cases, DSPs are indistinguishable on the road, as their vehicles and uniforms are branded as Amazon. ²³

Among other issues, prior research on the DSP model has found that DSP drivers face significant occupational safety risks. This includes reports on their high injury rates and investigations finding that: many DSP drivers are pressured to skip breaks and work 12-hour shifts, DSPs routinely bypass daily vehicle inspections and fail to have proper safety and temperature control systems in their vehicles, and Amazon escapes responsibilities for crashes on the road for subcontracted workers. ^{24, 25, 26, 27} The ITA data from known DSPs in New York City confirms this problem locally.

As seen in Table 3, in the two years of 2023 and 20249 there were 625 injuries reported to OSHA by known DSPs, 89% of which (555) were DART cases. In this two-year period, the TRIR and DART rates per 100 FTEs were 9.2 and 8.1, respectively. As seen in Figure 3, in both years, known DSPs had both higher TRIRs and DART rates than other courier industry employers within New York City. In addition, within these two years, DSPs had higher TRIR and DART rates than the DCP-identified last mile facilities.

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⁹ Analysis for DSPs was limited to these two years due to a significant increase in reporting of injuries from 2022 to 2023 among identified DSPs.

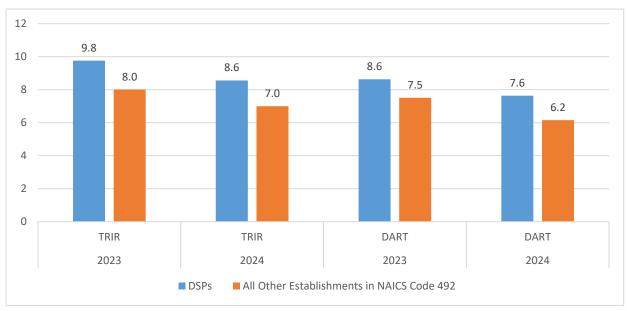
However, the TRIR and DART numbers listed above only include entities that the report was able to identify as DSPs¹⁰, but due to a lack of reporting by Amazon either to the public or a government agency on who the DSP operators are, this doesn't represent the entirety of the DSP operation in New York City.

Table 3: Reported Injuries of Known Delivery Service Partners, Operating in New York City 2023-2024

Year	Number of Employers Reporting Data	Number of FTEs	Total number of injuries and illnesses	TRIR	DART Rate
2023	36	3,360	328	9.8	8.6
2024	42	3,469	297	8.6	7.6

Source: Occupational Safety and Health Administration, Injury Tracking Application (ITA) Data, Summary Data

Figure 3: Injury Rates, DSPs and Larger Courier Industry, NYC 2023-2024



Source: Occupational Safety and Health Administration, Injury Tracking Application (ITA) Data, Summary Data

¹⁰ See methodology section for more details on how DSPs were identified.

Regulatory Challenges

Managing the traffic, labor, and safety impacts of the e-commerce boom and last mile delivery industry is a complex task that requires coordination between multiple government entities as well as buy-in from the private sector. This section examines the regulatory landscape around last mile delivery facilities and potential opportunities and gaps in the measures to mitigate their negative impacts on New York City neighborhoods. Key challenges in regulating this industry include the following:

Emissions linked to warehouses come from trucks and other mobile sources of pollution that are more challenging for cities and states to regulate than direct sources.

Emissions from warehouses are largely indirect or mobile-source emissions produced by the heavy-duty diesel trucks, vans, and delivery vehicles that serve these facilities, rather than by the warehouses themselves. Unlike stationary sources such as boilers or manufacturing equipment, which local or state environmental agencies can regulate directly, mobile sources fall primarily under federal jurisdiction through the Clean Air Act and EPA vehicle and fuel standards.²⁸ ²⁹This limits the ability of cities to directly restrict or cap emissions from trucks, even when they are the dominant contributors to local air pollution.

Municipal governments cannot set their own emission standards or mandate engine retrofits, and must instead rely on indirect tools that target the stationary source such as zoning, land-use approvals, fleet electrification incentives, or truck-route management to mitigate pollution. Truck emissions are also highly concentrated and unevenly distributed, disproportionately affecting neighborhoods near industrial corridors and highways that are often environmental justice communities already burdened by poor air quality. Because pollutants such as fine particulate matter (PM2.5) and nitrogen oxides (NOx) are short-lived and localized, the public health impacts are severe but the regulatory levers are fragmented.³⁰

Delivery companies' reliance on subcontractors complicates efforts to enforce labor standards and protections for workers. Major corporations' growing reliance on subcontractors has significantly complicated efforts to enforce labor standards and protect workers' rights. Outsourcing through chains of contractors and subcontractors allows companies to distance themselves from employment liabilities and oversight. According to the Economic Policy Institute (EPI), digital-platform delivery companies are increasingly structured as "platforms that employ no one," shifting the burden for wages, benefits, and protections to downstream contractors rather than to the platform itself.³¹

Historically, the subcontracting trend dates back to manufacturing in the late 19th and early 20th centuries under what was termed the "sweating system"—where large firms farmed out work to smaller contractors to evade labor protections and minimize costs. In modern logistics and delivery systems, this structure remains pervasive: a recent legal concept of "joint employment" highlights how firms that outsource work may still bear responsibility, yet enforcement remains fragmented. 33

Because companies like Amazon contract with thousands of DSPs or delivery firms rather than directly employing drivers or warehouse workers, regulatory agencies face significant difficulty identifying who is responsible when labor violations occur. Enforcement becomes especially challenging when layers of subcontractors are involved, making accountability diffuse and standards easier to evade. Amazon's dismissal of more than 150 unionized delivery drivers in Queens drew national attention to how weakened federal labor oversight leaves subcontracted and misclassified workers increasingly vulnerable. ³⁴

A federal government hostile to environmental and labor regulation is undermining efforts to improve sustainability and enforce workers' rights. The federal government's current regulatory posture has significantly weakened environmental safeguards and labor protections. Environmental Protection Agency (EPA) rollbacks are projected to eliminate rules that currently save 30,000 lives and \$275 billion annually.³⁵ The EPA is reconsidering key clean truck and greenhouse gas rules, leaving local governments with fewer federal safeguards and greater responsibility to address warehouse-related air pollution on their own.³⁶

The same is true for labor regulation: since early 2025, the Trump administration has further eroded the federal government's enforcement of worker-classification and wage laws. The U.S. Department of Labor directed staff to stop applying the 2024 independent contractor rule and revert to older, more employer-friendly standards, making it easier to classify delivery and warehouse workers as contractors rather than employees.³⁷ Furthermore, during the Biden Administration, the National Labor Relations Board (NLRB)'s wider interpretation of a "joint employer" enabled unionized DSP workers in Palmdale, California, and Atlanta, Georgia, to win the right to collectively bargain with Amazon, via regional board rulings, setting a precedent for other DSP workers.³⁸ The precedent from these rulings is potentially in jeopardy under the current Trump Administration, as Trump has indicated he wants a more narrow interpretation of a joint employer in NLRB cases, as he in January 2025, justified the firing of Board Member Gwynne Wilcox and General Council Jennifer Abruzzo by arguing their interpretation of a joint employer "vastly exceeded the bounds of the National Labor Relations Act." ³⁹

Additionally, there are regulatory challenges related to OSHA's enforcement of workplace safety within the last mile delivery system due to actions by the Trump Administration that ultimately limit the agency's ability to address the unique challenges posed by the industry. This includes an executive order in January 2024 for all federal agencies requiring that ten existing regulations be revoked before any new regulation is issued, ultimately hampering OSHA's ability to promulgate new standards and a proposed rule that would narrow the scope of another key tool OSHA has to regulate new industries, the General Duty clause, which requires employers to take measures to ensure all recognized hazards that can cause death or serious harm are addressed. 40 41 While, New York State has made progress on regulating warehouses in general with the Warehouse Worker Injury Reduction Act and the Warehouse Worker Protection Act, which require warehouses to have an injury reduction program and provide transparency around the usage of performance metrics, respectively. 42 43 Despite this, more action needs to be taken to ensure safety standards for

all workers in the last mile delivery system, but particularly for drivers, not covered in these state bills.

In the absence of federal leadership and amid active efforts to dismantle existing safeguards, New York City has both the opportunity and obligation to step in to fill the gap, protect workers, and advance a more sustainable and equitable logistics industry.

The City lacked meaningful oversight over the delivery industry during the growth in warehouses in the early pandemic years, leaving agencies in the position of retroactively developing and applying regulations to these facilities. Without meaningful oversight during the initial warehouse boom, the City and New York City Council have been left in the position of retroactively developing and applying regulations to facilities that have already reshaped neighborhood conditions and public health. Without zoning restrictions or licensing requirements in place, the vast majority of the city's last mile facilities were developed as-of-right in New York City's industrial areas, with no meaningful opportunities to address community concerns or assess environmental and safety impacts. According to DCP, of the 11 million square feet of last mile facilities currently in operation in New York City, about half of those facilities exist very near areas zoned for residential use, but faced no requirement for environmental review, community board input, City Council approval, or agency oversight beyond standard building inspections and certificates of occupancy. Although legislative and land-use efforts are now underway, the industry remains effectively unregulated five years after the height of the pandemic.

Existing freight and delivery management initiatives launched by the New York City Department of Transportation (NYC DOT) are too small in scale relative to the volume of package deliveries in the city and lack input from workers responsible for using the programs. NYC DOT has laid out an ambitious framework to modernize freight and delivery management through two cornerstone plans, Delivering New York: A Smart Truck Management Plan and Delivering Green: A Vision for a Sustainable Freight Network. Together, these plans aim to make goods movement safer, cleaner, and more efficient by shifting deliveries to off-hours, improving truck routing and curb management, expanding loading zones, and increasing the share of goods moved by rail, marine freight, and low-emission vehicles.

To advance these goals, NYC DOT has implemented several pilot programs, including LockerNYC, which provides secure package lockers to reduce double-parking and failed deliveries; micro-hub delivery zones, where trucks can transfer goods to e-cargo bikes or electric vans; and the Cargo Bike Pilot, which has authorized commercial cargo bike operations and dedicated parking to replace some truck deliveries with zero-emission alternatives. The City of Yes zoning text amendment passed in 2025 allowed for the creation of freight "microhubs" in some storefronts. This supplements a NYC DOT program to establish on-street microhubs, which serve as decentralized spaces for trucks to unload packages and load them onto more sustainable modes of transportation for the last leg of delivery. NYC DOT has also added nearly 3,000 new loading zones since 2021 to alleviate curbside congestion. These initiatives demonstrate meaningful progress but remain modest relative to the scale of the city's freight system.

The NYC Clean Trucks Program, administered by the NYC DOT and NYCEDC, provides financial incentives to help truck owners replace older, high-emitting diesel vehicles with cleaner models, including electric and alternative-fuel trucks. Since its launch in 2012, the program has replaced or retrofitted more than 1,000 trucks, reducing an estimated 150 tons of nitrogen oxides (NOx) and 5 tons of fine particulate matter (PM2.5) annually. The program recently increased its incentives — as of November 2025 the rebate for Class 8 battery electric trucks will go up to a maximum of \$340,000 per truck.⁴⁵

While these programs reflect promising innovation, they are not yet deployed at a scale commensurate with the city's needs, and none of these efforts directly address the proliferation of large last mile distribution facilities that have transformed industrial neighborhoods and intensified environmental and safety burdens. They also do not meaningfully consider the intersecting labor and worker rights issues within the logistics sector, where subcontracted and misclassified workers face unsafe conditions and limited protections. A more comprehensive, cross-agency approach will be needed to close these gaps and ensure the City's freight strategy advances both sustainability and equity.

The City lacks a single coordinating entity to oversee initiatives regulating the package, freight, and food delivery industries. The City currently lacks a dedicated, centralized agency to oversee the full spectrum of the package, freight, and food delivery industries, leaving responsibility scattered across multiple departments. Much of the recent focus has centered on food delivery workers. In his 2024 State of the City address, Mayor Eric Adams proposed creating a standalone "Office of Sustainable Delivery" to regulate the growing micromobility delivery sector. However, that proposal excluded package and freight carriers and has stalled in the New York City Council, with no public hearings held even a year later.

In the FY26 budget, the administration instead announced the creation of a new delivery worker enforcement team within NYC DOT, rather than the promised standalone office, to focus largely on e-bike regulation. The budget allocates \$6.1 million for this effort, yet it still fails to regulate the app-based delivery companies responsible for much of the erratic driving and street safety issues identified in the Office of the New York City Comptroller's micromobility report.

These delivery challenges cut across labor rights, zoning, environmental protection, and traffic safety, requiring coordinated oversight by NYC DOT, the Department of Consumer and Worker Protection (DCWP), DCP, and the Department of Environmental Protection (DEP). Yet without a single coordinating entity, efforts remain siloed, creating inefficiencies and risking an overemphasis on enforcing rules against workers rather than holding the corporations driving these conditions accountable. A unified structure is needed to integrate zoning rules, labor rights protections, environmental enforcement, and delivery industry oversight.

Recommendations

Regulating the last mile package delivery industry requires managing both the development of new facilities and operations at existing ones.

1. Establish labor standards to mitigate occupational injuries among workers in the last mile delivery system, via a licensing program. The City Council must pass the Delivery Protection Act (Intro 1396), requiring facility operators, as part of a licensing program, to directly employ workers engaged in "core services" such as transporting or delivering packages to NYC residents, fulfill safety training and recordkeeping requirements for each worker, and in the event of a termination, provide an employee with a prior 30-day notice and a stated reason. Furthermore, the bill would help to ensure compliance with relevant laws across all levels of government (such as workplace protections, road safety, and environmental protection) by giving DCWP the ability to suspend licenses for operators with recent histories of violations.⁴⁶

In addition to the benefits for workers themselves, this bill would have a positive impact on street safety in last mile delivery by leveling delivery driver access to safety training. Currently, workers at legacy companies like UPS receive more robust safety training compared to those at Amazon and contracted DSP companies. ⁴⁷ The bill would require employers in the last mile industry to provide, via a specialized reputable external organization, a minimum of six hours of driver safety training. This training would instruct workers on how to operate delivery vehicles in dense areas, share the road with smaller vehicles and cyclists, and make stops along delivery routes without causing safety hazards for pedestrians.

Beyond training, the bill's direct employment provision will likely have a positive impact on street safety. As previously mentioned, the subcontracting model pursued by companies like Amazon shields the primary company from legal liability despite setting the delivery routes and performance benchmarks. 48 A lack of liability results in fewer incentives to ensure that routes, delivery times, performance benchmarks for drivers, vehicle quality, and driver preparedness ensure safety. 49 This is unlike the direct employment model of companies like UPS, which are liable for injuries on the road and, as a result, are financially incentivized to reduce traffic incidents and injuries. One example of this is that UPS is "invested heavily in data systems to optimize delivery schedules and reduce exposures to injuries sustained in driving." ⁵⁰ Furthermore, UPS, as part of onboarding new drivers, requires them to attend training schools, where they take intensive courses with exams on safe driving. The company has also reported investing more than \$200 million annually in safety training alone.⁵¹ A direct employment requirement would create legal and financial incentives in the business model of all local operators - whether that is via routes, delivery times, vehicle inspections, workloads, and performance metrics- to reduce the chance of crashes, not just increase the speed of delivery.

2. Regulate mobile sources of pollution linked to last mile warehouses through the implementation of an indirect source rule (Pass & Implement Intro 1130). Regulating the truck traffic tied to last mile warehouses is one of the most important steps the City can take to improve air quality in communities that bear the brunt of freight-related pollution. Intro 1130, sponsored by Council Member Alexa Avilés, would create an "indirect source rule", a common regulatory tool used in other states like California, to hold warehouse operators accountable for the emissions generated by the trucks serving their sites. Rather than regulating the warehouse buildings themselves, the rule targets the mobile sources of pollution, meaning the diesel trucks and vans that move in and out of these facilities hundreds of times per day. 52

Under the proposal, operators would be required to meet a set of emission-reduction targets by earning points from a menu of options such as investing in electric trucks, installing EV charging infrastructure, or shifting a share of deliveries to cargo bikes or other low-emission vehicles. This flexible, performance-based approach gives businesses multiple pathways to compliance while ensuring that pollution is reduced where it matters most, near residential neighborhoods and environmental justice communities already burdened by poor air quality.

The bill is currently undergoing environmental review, but both the City Council and the Department of Environmental Protection (DEP) should move swiftly to pass and implement it. Doing so would establish the City's first regulatory framework for tackling warehouse-related emissions, align local policy with state and federal climate goals, and directly improve air quality and public health in the communities most affected by the growth of last mile logistics.

3. Prevent the further concentration of warehouses in environmental justice communities by finalizing DCP's Last Mile Facility Text Amendment. The proposed zoning amendment from the New York City Department of City Planning (DCP) would create a new category of "Parcel Delivery Facilities" (aka last mile warehouse facilities) and require that any facility meeting the definition undergo a discretionary review process—specifically, a special permit from the New York City Planning Commission (CPC)—before it can be built. Currently these large-scale e-commerce-distribution facilities can be developed "as-of-right," meaning they proceed without community input, public review, or meaningful site-specific scrutiny. DCP's draft scope of work, published in early 2025, confirms that the special permit would apply to new facilities of 50,000 square feet or larger, located in manufacturing or commercial zones, unless they meet narrow exemptions (e.g., waterfront or water-dependent sites).

This text amendment is the result of sustained advocacy by the Last Mile Coalition—a city-wide alliance led by the New York City Environmental Justice Alliance (NYCEJA) together with ALIGN: The Alliance for Worker Justice and other community groups including UPROSE, The Point CDC, New York Lawyers for the Public Interest, El Puente and Earthjustice. These groups have championed the need for zoning reform to halt the unchecked clustering of last mile warehouses in low-income and

environmental-justice neighborhoods and make sure that communities have a voice in siting decisions.

The amendment remains in the early stages of the public-review process. DCP has initiated an environmental review and held scoping meetings; it aims to post related public notices and begin ULURP (Uniform Land Use Review Procedure) by the end of 2025. The City and Council should prioritize finalizing and passing this zoning reform to prevent the continued concentration of warehouse facilities in environmental justice communities as freight volumes and delivery demand continue to rise.

- 4. Scale up the City's existing freight management programs to improve the efficiency and sustainability of package delivery throughout the city, in partnership with workers involved in freight operations. Key initiatives include:
 - Reform the commercial cargo bike program to enable its expansion: The Commercial Cargo Bike Pilot has shown strong promise in reducing truck traffic and emissions in New York City, but its limited scope and regulatory constraints prevent it from reaching its full potential. Since launching in 2019, the pilot has proven that cargo bikes can deliver goods quickly, safely, and without emissions, making more than 130,000 trips and delivering over 5 million packages by 2022.53 Despite this success, the program remains limited to a small number of companies and neighborhoods, with strict rules on bike dimensions and reporting requirements that discourage participation, especially among small operators.

Infrastructure and integration challenges also hinder progress. Cargo bike delivery zones and parking corrals are scarce, and the program is not yet connected to broader freight strategies such as micro-hubs or truck route management. To scale effectively, the City should expand infrastructure investments like dedicated lanes, loading zones, and charging stations; simplify registration and compliance for smaller operators; and update equipment rules to allow a wider range of cargo bike designs. Furthermore, cargo bike delivery workers experience significant on-the-job challenges. Workers frequently encounter broken or malfunctioning equipment, must complete deliveries in extreme weather conditions, and lack access to basic amenities like bathrooms.⁵⁴

To scale effectively while addressing labor concerns, the City should expand infrastructure investments like dedicated lanes, loading zones, and charging stations; simplify registration and compliance for smaller operators; and update equipment rules to allow a wider range of cargo bike designs. The City should, in consultation with workers and their representatives, also strengthen protections for workers operating cargo bikes by setting equipment safety and ergonomic standards and requiring employers to

- accurately track work hours, and provide access to bathrooms and rest facilities. 55
- Increase the number of Neighborhood Loading Zones throughout the city: Dedicated spaces for vehicles to unload packages are a necessity on residential streets receiving high volumes of deliveries. There are over 11,000 commercial loading zones throughout New York City but only 5% of these are in residential areas. 56 As a result, residential streets experience chronic double-parking and illegal parking. The City must expand the number of neighborhood loading zones to accommodate the boom in e-commerce and deliveries to private residences.
- Expand the Smart Curbs pilot citywide: NYC DOT began implementation of the city's first Smart Curbs program in the Upper West side in 2024 to improve the management and efficiency of its curb lanes. The pilot sought to leverage technology to reform parking policy, identify locations for new bike parking, and install dedicated freight loading zones and microhubs in one of the city's densest neighborhoods. The expansion of this pilot that would convert roughly 70 curbside parking spots from free parking to metered space and dedicated commercial delivery zones was temporarily paused in August 2025. City Hall reversed the conversion in response to community backlash and public outcry about the affordability of parking. This decision delayed what was supposed to be the pilot's launch of new loading zones, microhubs, and parking reforms despite months of outreach. The City should immediately resume and accelerate the Smart Curbs program and work to expand the pilot citywide, implementing lessons learned and ensuring that dedicated commercial loading zones, micro-hubs, and dynamic curb management are scaled to match the real-world volume of deliveries.
- 5. Increase Incentives & Proactive Outreach for the NYC Clean Trucks Program: Continuing to expand this program would deliver substantial air-quality and public-health benefits, especially in environmental justice communities disproportionately impacted by truck traffic, while supporting the city's broader goals for zero-emission freight and compliance with its 2050 carbon-neutral targets. The program's 2025 expansion increased incentives for Class 8 battery-electric trucks to up to \$340,000 per vehicle, marking an important step toward electrifying the city's freight sector. Further increasing these rebates and doubling down on outreach and education, particularly to small and independent truck operators, would help maximize participation and accelerate adoption in communities most affected by freight emissions.
- 6. Establish a coordinating entity to oversee the regulation of the delivery industry, covering both last mile facilities and delivery apps. In early 2024, the Adams Administration proposed creating a new Department of Sustainable Deliveries to regulate app-based delivery companies whose workers use e-bikes and mopeds to transport food and groceries across the city. Similar to last-mile warehouses, the

rapid growth of this industry has introduced new safety, sustainability, and labor challenges for New York City. The FY26 budget allocated \$6.5 million for NYC DOT to establish an in-agency traffic enforcement unit, branded as the "Department of Sustainable Delivery." However, this unit's scope is narrow, focusing primarily on ebike enforcement rather than broader traffic safety issues such as illegal parking, blocked bus and bike lanes, or unsafe loading practices.

Absent broader coordination, enforcement efforts will remain piecemeal and limited in impact. A cross-agency approach—integrating DOT, DCWP, DSNY, and NYPD—would ensure that policies and enforcement strategies are aligned around shared goals of safety, fairness, and sustainability. Measures such as establishing dedicated loading zones, improving data sharing, holding app companies accountable for compliance, and investing in safer bicycle infrastructure would be far more effective if implemented collaboratively.

As one concrete step, a coordinating entity should develop and publish public-facing guidance for package delivery employers on best practices to protect workers and the public. This guidance should include vehicle inspection protocols, handling of hazardous materials, defensive driving in pedestrian-heavy areas, and personal safety when delivering directly to residences.

Conclusion

The online delivery boom has given consumers the ability to order items online and have it delivered to their homes within a few days. This shift towards e-commerce has greatly enhanced convenience for New Yorkers but carries profound changes for freight movement, transportation, and labor in the city. To meet demand and fulfill millions of daily deliveries, last mile warehouses proliferated throughout New York City. While development of new facilities peaked during the early pandemic years but has since remained stable, but the last mile delivery industry's impacts on traffic safety, public health and climate, and workers' rights remain.

A safer, more sustainable freight and last mile delivery system is within reach. The City must now retroactively address these challenges and act to regulate the companies operating these facilities. Nearly six years after the onset of the pandemic, legislation to protect the tens of thousands of workers employed in last mile warehouses and mitigate pollution in the neighborhoods where these facilities are clustered is still pending. If enacted and scaled up, Cityled efforts to mitigate traffic and pollution and protect workers stand to deliver better jobs and cleaner neighborhoods for thousands of New Yorkers.

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Methodology

Traffic Safety

Data on motor vehicle crashes are collected by NYPD and published on NYC OpenData.⁵⁷ These data include crashes recorded by NYPD since 2012, with details on the number of injuries and fatalities and the types of vehicles involved. An exploration of these data revealed that the number of recorded crashes that did not involve injuries dramatically declined during the pandemic, due to changes in data recording procedures. For consistency, this analysis considered only crashes which had at least one recorded injury, as these types of crashes seem to be consistently recorded. Many different names are entered in these data for vehicle type. Vehicle names in these columns were manually reviewed and all crashes which included truck-type vehicles were manually labeled as such.

Data on last mile warehouses were provided by NYC Department of City Planning; these data include the geographic location and year opened for each site. In order to meaningfully compare crashes before and after warehouses were opened, this analysis looked only at the 18 sites which opened between 2015 and 2022; these locations had at least three full years of crash data both before and after the warehouse opened. (Two Amazon warehouses were opened in the same year on neighboring blocks in East New York; one of these sites was removed from the data to avoid double-counting this area.)

Crashes were spatially joined to warehouse locations such that all crashes within a one-half mile radius of each warehouse were assigned to that site. Crashes were summarized by warehouse site and by year. For each site, years were labeled as either before or after the warehouse opened (removing the year in which the warehouse opened), then average values were computed across before and after years, then percent changes were computed between the before-open and after-open annual averages. The analysis then considered what portion of the sites had an increase between the before and after periods, and the overall average change across these sites.

This method compares geographic locations only to themselves by comparing crashes within the half-mile proximity to each warehouse before and after that warehouse opened. This approach sidesteps the substantial differences in built environment and other factors between different neighborhoods.

Demographics

Demographic data are from the U.S. Census 2023 American Community Survey at the Census Tract level. Warehouse half-mile areas were spatially joined to Census Tracts, then the population across all Tracts which intersect these half-mile zones were aggregated. Aggregate racial and ethnic composition across all Tracts within a zone with increasing crashes were compared to aggregate demographics citywide.

Worker Safety

Data on workplace injuries came from the Occupational Safety and Health Administration (OSHA)'s Injury Tracking Application (ITA) data.⁵⁸ Counts of total number of injuries, Total Recordable Incident rates (TRIR), Days Away or Restricted, or Transferred rates (DART), and full-time equivalents (FTEs) counts were calculated from the ITA's Summary Data for 2020, 2021, 2022, 2023, and 2024. This data is derived from records of OSHA Form 300A submitted by employers to the agency.

Injury rates, including TRIRs and DART rates, were calculated as aggregates of establishments. Injury rates are reported as injuries per 100 FTEs. OSHA assumes that 2,000 employee-hours equals one FTE. Injury counts, the variable "Total number of injuries and illnesses", and hours worked were summed before calculating rates to ensure that rates were properly weighted and not skewed by outlier establishments.

Data on the number of DART days and individual occupations of injured workers came from ITA's Case Detail Data for 2023 and 2024. For last mile facilities specifically, the median of all DART days was calculated for the years 2023 and 2024. This data is derived from records of OSHA Form 300 submitted by employers to the agency.

The full universe of ITA data analyzed included employers with New York City addresses within the 3-digit North American Industry Classification System (NAICS) code of 492, Couriers and Messengers. Last mile facilities were identified in the ITA data based on a list provided to the Office of the New York City Comptroller by the New York City Department of City Planning. Delivery Service Partners (DSP) were identified through online searches for each establishment that reported injury data for facilities in NAICS 492 (Couriers and Messengers). This included reviewing company websites, job postings, and third-party sources such as LinkedIn, Indeed, and Warehouse Ninja 10, a platform that tracks Amazon DSPs. In addition, the ITA data was used to identify DSPs, as in some cases it listed Amazon facility codes or the addresses of Amazon facilities directly in the information shared by the employer with OSHA. While most DSPs work exclusively for Amazon, some also engage in delivery or logistics activities unrelated to Amazon. For this analysis, we assumed a company worked exclusively for Amazon unless we found information indicating otherwise.

Appendix

Injury Reporting to the Occupational Safety and Health Administration from Last Mile Facilities (Identified by The New York City Department of City Planning) by Year

Operator	Facility Name	Address	Borough	2022	2023	2024
FedEx	FedEx Ground	570 E 108 Street	Brooklyn	Reported Injuries	Reported Injuries	Reported Injuries
FedEx	FedEx Home Delivery	830 Fountain Avenue	Brooklyn	Reported Injuries	Reported Injuries	Reported Injuries
FedEx	FedEx Home Delivery	83-15 24th Ave	Queens	Reported Injuries	Reported Injuries	Reported Injuries
FedEx	FedEx	48-00 Grand Avenue	Queens	Reported Injuries	Reported Injuries	Reported Injuries
UPS	Bank Street	800 Bank Street	Brooklyn	Reported Injuries	Reported Injuries	Reported Injuries
UPS		4275 Boston Post Rd	Bronx	Reported Injuries	Reported Injuries	Reported Injuries
FedEx	FedEx Ground	29-01 Borden Ave	Queens	Reported Injuries	Reported Injuries	Reported Injuries
UPS	Metro Queens	50-02 55th Avenue	Queens	Reported Injuries	Reported Injuries	Reported Injuries

Operator	Facility Name	Address	Borough	2022	2023	2024
UPS	Laurelton	13640 Springfield Blvd	Queens	Reported Injuries	Reported Injuries	Reported Injuries
UPS	Manhattan South	325 West Houston St	Manhattan	Reported Injuries	Reported Injuries	Reported Injuries
Amazon	DBK6	2300 Linden Boulevard	Brooklyn	Reported Injuries	Reported Injuries	Reported Injuries
FedEx	FedEx Ship Center	606 West 49th St	Manhattan	Reported Injuries	Reported Injuries	Reported Injuries
Amazon	DBK1	26-15 Boody Street	Queens	Reported Injuries	Reported Injuries	Reported Injuries
UPS	Brush Ave	545 Brush Avenue	Bronx	Reported Injuries	Reported Injuries	Reported Injuries
FedEx		24-25 Brooklyn Queens Expressway	Queens	Reported Injuries	Reported Injuries	Reported Injuries
FedEx	FedEx Ship Center	563 West 41st Street	Manhattan	Reported Injuries	Reported Injuries	Reported Injuries
Amazon	DNJ3	1300 Viele Ave	Bronx	Reported Injuries	Reported Injuries	Reported Injuries
UPS	UPS Maspeth	46-05 56th Rd	Queens	Reported Injuries	Reported Injuries	Reported Injuries

Operator	Facility Name	Address	Borough	2022	2023	2024
Amazon	DAB5	270 Richards Street	Brooklyn	Reported Injuries	Reported Injuries	Reported Injuries
Amazon	DYY6	566 Gulf Avenue	Staten Island	Reported Injuries	Reported Injuries	Reported Injuries
FedEx	FedEx Ship Center	58-95 Maurice Avenue	Queens	Reported Injuries	Reported Injuries	Reported Injuries
FedEx	FedEx Ground	635 Zerega Ave	Bronx	Reported Injuries	Reported Injuries	Reported Injuries
FedEx	FedEx Ship Center	585 Washington St	Manhattan	Reported Injuries	Reported Injuries	Reported Injuries
FedEx	FedEx Ship Center	670 E 132nd St	Bronx	Reported Injuries	Reported Injuries	Reported Injuries
UPS	43rd St	643 West 43rd Street	Manhattan	Reported Injuries	Reported Injuries	Reported Injuries
FedEx	FedEx Ground	300 Maspeth Ave	Brooklyn	Reported Injuries	Reported Injuries	Reported Injuries
Amazon	DYO2	1055 Bronx River Avenue	Bronx	Reported Injuries	Reported Injuries	Reported Injuries
Amazon	DYN9	511 Barry Street	Bronx	Reported Injuries	Reported Injuries	Reported Injuries

Operator	Facility Name	Address	Borough	2022	2023	2024
FedEx		148 Leroy St	Manhattan	Reported Injuries	Reported Injuries	Reported Injuries
OnTrac		57-47 47th Street	Queens	Reported Injuries	Reported Injuries	Reported Injuries
FedEx	FedEx Home Delivery	100 Morgan Ave	Brooklyn	Reported Injuries	Reported Injuries	Reported Injuries
Amazon	DYN7	640 Columbia Street	Brooklyn	No Reported Injuries	Reported Injuries	Reported Injuries
FedEx	FedEx Ground	55-90 48th St	Queens	No Reported Injuries	No Reported Injuries	Reported Injuries
Amazon	DYY4	12555 Flatlands Avenue	Brooklyn	No Reported Injuries	No Reported Injuries	Reported Injuries
Amazon	DYN3	66-26 Metropolitan Avenue	Queens	No Reported Injuries	No Reported Injuries	Reported Injuries
Amazon	DYY4	12595 Flatlands Avenue	Brooklyn	Reported Injuries	Reported Injuries	No Reported Injuries
FedEx	FedEx Ship Center	50 20th Street	Brooklyn	Reported Injuries	Reported Injuries	No Reported Injuries

Operator	Facility Name	Address	Borough	2022	2023	2024
FedEx	FedEx Ground	46-06 57th Avenue	Queens	Reported Injuries	Reported Injuries	No Reported Injuries

Endnotes

¹ New York City Department of Planning. (2025). *Last-Mile Facility Text Amendment*. https://www.nyc.gov/content/planning/pages/our-work/plans/citywide/last-mile-facility-text-amendment

²Earth Justice. (2023). FACT SHEET: Amending Regulations on Last-Mile Warehouses is Critical to Achieving New York City's Environmental Justice and Racial Equity Goals. https://earthjustice.org/wp-content/uploads/2023 last mile fact sheet en final 1 1.pdf

³ New York City Department of Planning. (2025). Last-Mile Parcel Delivery Facilities Market. Assessment DCP Market Assessment https://www.nyc.gov/content/planning/pages/our-work/plans/citywide/last-mile-facility-text-amendment

⁴ Felix, A., & Pollack, T. (2021). *Hidden and in Plain Sight: Impacts of E-Commerce in Massachusetts*. The Metropolitan Area Planning Council (MAPC). https://www.mapc.org/wp-content/uploads/2021/02/Feb2021-Ecommerce-Report.pdf

⁵ New York City Department of Health and Mental Hygiene. *The New York City Community Air Survey*. https://a816-dohbesp.nyc.gov/IndicatorPublic/data-features/nyccas/

⁶ ibid

⁷ Occupational Safety and Health Administration. 1904.41 - Electronic submission of Employer Identification Number (EIN) and injury and illness records to OSHA. https://www.osha.gov/laws-regs/regulations/standardnumber/1904/1904.41

⁸ Occupational Safety and Health Administration. (2024) *Incidence rates of nonfatal occupational injuries and illnesses by industry and case types, 2023*. https://www.bls.gov/iif/nonfatal-injuries-and-illnesses-tables/table-1-injury-and-illness-rates-by-industry-2023-national.htm

⁹ New York State Department of Labor. *Occupational Illnesses and Injuries* https://dol.ny.gov/SOII

¹⁰ ibid

¹¹ Occupational Safety and Health Administration. (2024) *Incidence rates of nonfatal occupational injuries and illnesses by industry and case types, 2023*. https://www.bls.gov/iif/nonfatal-injuries-and-illnesses-tables/table-1-injury-and-illness-rates-by-industry-2023-national.htm

¹² New York State Department of Labor. *Occupational Illnesses and Injuries* https://dol.ny.gov/SOII

13 ibid

- ¹⁴ Amazon. Service Types | Empower your team to deliver their best to the community you serve. https://logistics.amazon.com/marketing/service-types
- ¹⁵ Amazon. Your Opportunity | Own a business that works as hard as you do. https://logistics.amazon.com/marketing/opportunity
- ¹⁶ Bishop, T. (2022) A franchise in disguise? Amazon's Delivery Service Partners program will face a key legal test. GeekWire. https://www.geekwire.com/2022/a-franchise-in-disguise-amazons-delivery-service-partners-program-will-face-a-key-legal-test/
- ¹⁷ Hall, M. (2025). *Teamsters Say Amazon Illegally Fired 150 Third-Party Drivers*. MSN. https://www.msn.com/en-us/money/human-resources/teamsters-say-amazon-illegally-fired-150-third-party-drivers/ar-AA1Miy0C
- ¹⁸ Amazon. (2024). Everything you need to know about Amazon's Delivery Service Partner (DSP) program. https://www.aboutamazon.com/news/policy-news-views/amazon-dsp-program-update
- ¹⁹ Paterson, H. (2018). 'Amazon has all the power': How Amazon controls legions of delivery drivers without paying their wages and benefits. Business Insider. https://www.businessinsider.com/amazon-controls-delivery-drivers-without-paying-wages-2018-9
- ²⁰ Ibid
- ²¹ Schneider, D., Weil, D, Su, J, & Bruey, K. (2025). *Amazon Drives Low Wages: The Unraveling of Workplace Protections for Delivery Drivers*. The Shift Project. https://shift.hks.harvard.edu/amazon-drives-low-wages/
- ²² Amazon. Welcome to the DSP program webinar series. https://logistics.amazon.com/marketing/webinars
- ²³ Bishop, T. (2022) A franchise in disguise? Amazon's Delivery Service Partners program will face a key legal test. GeekWire. https://www.geekwire.com/2022/a-franchise-in-disguise-amazons-delivery-service-partners-program-will-face-a-key-legal-test/
- ²⁴ The Strategic Organizing Center. (2022). *The Worst Mile: Production Pressure and the Injury Crisis in Amazon's Delivery System*. https://thesoc.org/wp-content/uploads/sites/342/The-worst-Mile-1.pdf

- ²⁷ Callahan, P. (2019). The Deadly Race: How Amazon Hooked America on Fast Delivery While Avoiding Responsibility for Crashes. ProPublica https://features.propublica.org/amazondelivery-crashes/how-amazon-hooked-america-on-fast-delivery-while-avoiding-responsibilityfor-crashes/
- ²⁸ National Academies of Sciences, Engineering, and Medicine. (2006). State and Federal Standards for Mobile-Source Emissions. Washington, DC: The National Academies Press. .https://nap.nationalacademies.org/read/11586/chapter/5;
- ²⁹ Beggs, A. & Tomasi, P. (2025). Pumping the Brakes? Outlook for State and Federal Vehicle, Engine, and Equipment Emissions Standards. Foley & Lardner LLP https://www.foley.com/insights/publications/2025/01/pumping-the-brakes-outlook-for-stateand-federal-vehicle-engine-and-equipment-emissions-standards/
- ³⁰ Kemp, D. & Doren, P. (2025). Rethinking Air Quality Regulation: Integrating Uncertainty, Costs, and Localized Solutions in Fine Particulate Matter Standards. Cato Institute https://www.cato.org/white-paper/rethinking-air-quality-regulation?
- ³¹ Sherer, J. & Poydock, M. (2023). Flexible work without exploitation. Economic Policy Institute. https://www.epi.org/publication/state-misclassification-of-workers
- ³² Goldstein, B. & Ruckelshaus, C. (2015). Lessons For Reforming 21st Century Labor Subcontracting: How 19th Century Reformers Attacked "The Sweating System". National Employment Law Project. https://www.nelp.org/app/uploads/2015/03/Lessons-For-Reforming-21st-Century-Labor-Subcontracting-How-19th-Century.pdf
- ³³ National Employment Law Project. 'Joint Employment' Keeps Corporations Accountable When They Outsource Work. https://www.nelp.org/explore-the-issues/contracted-workers/jointemployer-accountability
- ³⁴ Aratani, L. (2025). *Amazon fires 150 unionized third-party drivers, Teamsters says*. The Guardian. https://www.theguardian.com/technology/2025/sep/08/amazon-fires-driverscornucopia
- 35 Borenstein, S., Wildeman, M.K., Walling, M., Bickel, J. & Daly, M. (2025). Trump EPA rollbacks would weaken rules projected to save billions of dollars and thousands of lives. AP News.

²⁵ United States Senate. (2024). Letter to Andy Jassy, Chief Executive Officer, Amazon.com Inc. https://www.murphy.senate.gov/newsroom/press-releases/murphy-leads-bipartisan-group-of-34-senators-in-pressing-amazon-for-answers-on-the-mistreatment-of-delivery-drivers

²⁶ Palmer, A. (2021). Amazon DSPs tell drivers to bypass safety inspections. CNBC https://www.cnbc.com/2021/07/30/amazon-dsps-tell-drivers-to-bypass-safetyinspections.html

https://apnews.com/article/epa-zeldin-pollution-rules-analysis-savings-health-0a289aec2507ed38d386680afdd0ea45

- ³⁶ Environmental Protection Agency Press Office. (2025). *EPA Announces Action to Implement POTUS's Termination of Biden-Harris Electric Vehicle*. Mandate https://www.epa.gov/newsreleases/epa-announces-action-implement-potuss-termination-biden-harris-electric-vehicle
- ³⁷ United States Department of Labor, Wage and Hour Division. (2025). *US Department of Labor issues guidance on independent contractor misclassification enforcement.* https://www.dol.gov/newsroom/releases/whd/whd20250501
- ³⁸Smith, B. (2025). *Amazon's Legal Fights with NLRB Could Affect Future of Joint Employer Doctrine*. HR Daily Advisor. https://hrdailyadvisor.com/2025/02/13/amazons-legal-fights-with-nlrb-could-affect-future-of-joint-employer-doctrine/
- ³⁹ Blackman, J. (2025). *President Trump's Removal Letter of NLRB Member Gwynne Wilcox*. Reason. https://reason.com/volokh/2025/02/11/president-trumps-removal-letter-of-nlrb-member-gwynne-wilcox/
- ⁴⁰ Villagran, L. (2025). For every new rule, Trump tells federal agencies to eliminate 10 old ones. USA Today https://www.usatoday.com/story/news/politics/2025/01/31/trump-reduces-government-regulation-10-to-1/78103293007/
- ⁴¹ McFerran, Lauren. (2025). *Proposed OSHA Rule Is Dangerous for Workers and the Law*. The Regulatory Review. https://www.theregreview.org/2025/08/06/mcferran-proposed-osha-rule-is-dangerous-for-workers-and-the-law/
- ⁴² New York State Department of Labor. *The Warehouse Worker Injury Reduction Program.* https://dol.ny.gov/WWIRP
- ⁴³ New York State Department of Labor. Warehouse Worker Protection Act. https://dol.ny.gov/WWPA
- ⁴⁴ New York City Department of Planning. (2025). *Last-Mile Parcel Delivery Facilities Market. Assessment* DCP Market Assessment https://www.nyc.gov/content/planning/pages/our-work/plans/citywide/last-mile-facility-text-amendment
- ⁴⁵ New York City Department of Transportation. *About the NYC Clean Trucks Program*. https://www.nycctp.com/about
- ⁴⁶ CM Tiffany Cabán. (2025). A Local Law to amend the administrative code of the city of New York, in relation to requiring the licensing of last-mile facilities.

 Int 1396-2025

https://legistar.council.nyc.gov/LegislationDetail.aspx?From=Alert&ID=7681691&GUID=D08D0790-75EA-4AE7-9069-60134974B02B&Options=Advanced

⁴⁷ Bandler, J., Callahan, P., Burke, D., Bensinger, K. & O'Donovan, C. (2019). *Inside Documents Show How Amazon Chose Speed Over Safety in Building Its Delivery Network*. ProPublica. https://www.propublica.org/article/inside-documents-show-how-amazon-chose-speed-over-safety-in-building-its-delivery-network

⁴⁸ Bishop, T. (2022) A franchise in disguise? Amazon's Delivery Service Partners program will face a key legal test. GeekWire. https://www.geekwire.com/2022/a-franchise-in-disguise-amazons-delivery-service-partners-program-will-face-a-key-legal-test/

- ⁵⁰ Schneider, D., Weil, D, Su, J, & Bruey, K. (2025). *Amazon Drives Low Wages: The Unraveling of Workplace Protections for Delivery Drivers*. The Shift Project. https://shift.hks.harvard.edu/amazon-drives-low-wages/
- ⁵¹ Peterson, H. (2020). *Inside a UPS training school where workers haul boxes across slick 'ice,' perform high-stakes driving drills, and deliver packages to empty homes in a mock neighborhood*. Business Insider. https://www.businessinsider.com/ups-school-drivers-deliver-fake-packages-walk-on-ice-2020-2
- ⁵² CM Alexa Avilés. (2024). *Regulation of indirect sources of air pollution*. Int 1130-2024. https://legistar.council.nyc.gov/LegislationDetail.aspx?ID=7041944&GUID=64DA152F-2B02-4AA3-B716-AF327DD61032
- ⁵³New York City Department of Transportation (2023), *NYC DOT Takes Action to Authorize the Use of Larger Pedal-Assist Cargo Bikes*. https://www.nyc.gov/html/dot/html/pr2023/pedal-assist-cargo-bikes.shtml
- ⁵⁴ Kuntzman, Gersh. (2023). *Industry Leaders Slam DOT's Proposed Cargo Bike Rules*. StreetsBlog NYC. https://nyc.streetsblog.org/2023/08/21/industry-leaders-slam-dots-proposed-cargo-bike-rules

- ⁵⁶ New York City Department of Transportation. *Motorist & Parking Loading Zones*. https://www.nyc.gov/html/dot/html/motorist/loading-zones.shtml#map
- ⁵⁷ New York City Police Department. (2025). *Motor Vehicle Collisions Crashes*. NYC Open Data. https://data.cityofnewyork.us/Public-Safety/Motor-Vehicle-Collisions-Crashes/h9gi-nx95
- ⁵⁸ Occupational Safety and Health Administration. *Establishment Specific Injury and Illness Data* (Injury Tracking Application). https://www.osha.gov/Establishment-Specific-Injury-and-Illness-Data
- ⁵⁹ U.S. Bureau of Labor Statistics. *Couriers and Messengers: NAICS 492: U.S. Bureau of Labor Statistics*. https://www.bls.gov/iag/tgs/iag492.htm
- ⁶⁰ Warehouse.ninja. *Stop Guessing, Start Connecting with Last-Mile Delivery Contractors*. https://warehouse.ninja/

⁴⁹ ibid

⁵⁵ ibid





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