

Janno Lieber
Chairman and CEO
Metropolitan Transportation Authority
2 Broadway
New York, New York 10001

Ydanis Rodriguez
Commissioner
NYC Department of Transportation
55 Water Street
New York, New York

Chair Lieber and Commissioner Rodriguez:

I hope this letter finds you and your staff healthy and well. As New York City continues along its path towards recovering from the COVID-19 pandemic, we must ensure that New York City is taking steps to ensure that we come back stronger, more equitable and more resilient than we were before. That must include better funding for public transit, investing in infrastructure, and reducing the reliance on private vehicles, and Congestion Pricing will play a key role in that future.

The launch of Congestion Pricing will transform New York City, helping to reduce congestion and greenhouse gas emissions while improving street safety and our transit system. As the design and eventual implementation of congestion pricing continues, it is clear that we must ensure that the State and City have taken steps to ensure the success of the program. The devil will be in the details, and many questions remain.

The Manhattan Borough President's Office convened Congestion Pricing Roundtables and outreach comprised of notable transit and community stakeholders, who came together to discuss issues relating to program design and implementation, proactive transit investments, adjacent public realm and streets policy, and more. Below is a detailed list of some of the most pressing issues and concerns, and it is our hope that the City and State, as well as the Traffic Mobility Review Board when they are finally convened, will take these recommendations and questions seriously as we move gradually toward congestion pricing.

Program Implementation:

It is of the utmost importance that the details of this program – including hours of operation, cost, and exemptions– be designed with an emphasis on reducing congestion and the reliance on private vehicles, improving air quality and improving street safety. To achieve those goals, there

are a number of decisions the MTA and members of the Traffic Mobility Review Board (TMRB) must consider.

- **Implement two-way tolling and make tolls variable:** Congestion Pricing will only be completely successful if two-way tolling is implemented and toll prices are variable – in both time of day and day of the week – to ensure the program targets peak and off-peak travel times accurately and encourages drivers to stay off the road at times when congestion is highest.
- **Charge more for larger vehicles and less for smaller ones:** As a means to incentivize the use of smaller delivery vehicles and to combat the rise in SUV use for personal vehicles, the program should place higher fees on larger vehicles and gas-powered vehicles, and lower fees on smaller vehicles and on electric vehicles. This would recognize the negative impacts on the environment, street safety, and congestion that larger vehicles cause while also allowing those who must use a vehicle to transition to smaller ones over time for cost savings.
- **Exempt Taxis and For-Hire Vehicles:** Taxis and FHV's already pay a legislated \$2.50 and \$2.75 congestion charge, respectively. There is no need to place an additional fee on these vehicles and no other vehicles or industries should receive exemptions.
- **Do not offer undue rebates to drivers who have paid other tolls:** While it is understandable to want to rebate those who have already paid another toll, we must keep the goals of this program top of mind. Rebates for those coming from the Lincoln and Holland Tunnels should match tolls paid by drivers to enter the district. Meanwhile rebates for those traveling on other thoroughfares such as the George Washington Bridge, Triborough Bridge, and so forth, while acceptable to a certain degree, must also capture the cost of driving these long distances on multiple congested roadways.
- **Offer immediate rebates, not tax credits, to those who are eligible:** Drivers who are below the income threshold for Congestion Pricing should not be expected to cover the fee while they wait for a tax credit at the end of the year. By connecting license plates to an exempted driver, the State should offer immediate rebates so that financial burden is lessened for lower-income New Yorkers.

Proactive Investments in Transit and Other Street Interventions:

Other cities that implemented congestion pricing like London, Stockholm, and Milan made upfront investments in other transportation infrastructure to ease the transition for former drivers to alternative transportation modes. New York should also seriously consider many concrete investments.

- **The 2023 Streets Master Plan Should Focus on Readying Streets and Other Transportation Modes for Congestion Pricing Implementation:** In order to improve transportation options prior to congestion pricing and capitalize on the newly available

street space, we ask DOT frame the 2023 streets plan in the context of congestion pricing, and focus on bus, bike, and pedestrian improvements in and around the congestion zone that will better support and encourage public transit and safety and ensure the success of the congestion pricing program. We encourage the agency to look at remaining north-south avenues in the CBD for bus and bike priority as well as crosstown bus and bike access in upper Manhattan. These projects should be announced, funded, and committed to no later than in the FY24 budget.

- **The MTA must implement all-door boarding on buses citywide:** All-door boarding, which generally reduces the time buses spend at stops by around 20%, must be in place prior to congestion pricing in order to ensure we have the best bus system possible to carry additional riders.
- **The MTA must begin the Manhattan Bus Network Redesign process as quickly as possible:** We must ensure we have a reliable, efficient, and safe bus system to welcome many new riders while also supporting current ones. This must include redesigning Manhattan's bus routes, which have not changed in decades, to reflect modern travel patterns. In particular, the MTA should also look to improve not only intraborough travel but also interborough travel and can take inspiration from the connector services it operated during the overnight subway shutdowns at the onset of the pandemic.
- **DOT should raise the pedal-assist Citi Bike cap:** In order to facilitate additional trips that travelers will look to make between boroughs, DOT should raise the cap (20%) on the number of pedal-assist bikes allowed to comprise the Citi Bike system. E-bikes are an increasingly popular and important transit mode for New Yorkers, particularly those who travel long distances to and from uptown as well as Brooklyn, the Bronx and Queens.
- **Reform E-Commerce and deliveries:** Deliveries of goods to stores and homes plays a crucial role in our transportation sector, however trucks too often flout traffic laws and contribute greatly to climate change and the wear and tear on our roads and bridges. We must reform this sector by moving more deliveries to smaller vehicles, further expanding loading zones, and enforcing against the business practices of e-commerce companies that encourage parking and unloading in bus lanes, bike lanes, and sidewalks. Electric cargo bikes should be utilized where possible; we should incentivize this by increasing parking for cargo bikes and supporting state legislation to expand the legal width the of the bikes themselves. Lastly, micro-distribution centers should be further explored to reduce the amount of time larger trucks spend parked on city streets, and the Stipulated Fine Program must be revoked.

Outstanding Questions and Areas for Additional Study:

The effects of congestion pricing will reverberate across our transportation landscape and, unfortunately, there are still many outstanding questions that the TMRB and the MTA must clarify. Below are just a few important ones.

- **Clarify tolling viability for Queensboro Bridge Manhattan-bound off-ramp terminating on 62nd Street:** It is assumed that the majority of the Queensboro Bridge will be de-facto tolled since all but one of its roadways terminate on streets south of 60th. However, one ramp terminates on 62nd Street. While this ramp should be tolled in order to avoid localized traffic disruptions, the MTA has not made a public decision.
 - If the agency decides the ramp cannot be tolled, the DOT must consider a bevy of traffic diversions to mitigate this issue including HOV restrictions and even closing the lane entirely.
- **Study transportation changes in Battery Park City:** Battery Park City uniquely stands as the only neighborhood south of 60th Street that is also west of the West Side Highway. As such, the MTA and DOT must proactively study the impacts this plan will have on the neighborhood and possible remedies.
- **Study the viability of a residential permit parking program:** Cities that have implemented congestion pricing programs such as London and Stockholm have not experienced parking inundation in neighborhoods immediately outside the zone, but nonetheless the time has still come for the DOT to seriously study the potential for a residential permit parking program. Such a program could both provide parking for local residents while balancing demand, incentivize switches to more sustainable modes, and meet climate change goals, as other cities have successfully done.

Outstanding Items about Process:

New Yorkers, and especially Manhattanites, deserve a seat at the table to help craft this policy. Outstanding questions and transformational policy must be set in a transparent way in order to ensure public confidence in this historic policy.

- **At least one resident of Manhattan should be appointed to the Traffic Mobility Review Board:** While legislation creating congestion pricing mandated one representative each from the Metro-North and Long Island Rail Road regions, there is no requirement for there to be a resident from the area in which this program will be implemented. As clearly shown in this letter and other ongoing discussions, this is a highly complex program that Manhattan must be included in.
- **The traffic mobility review board must follow Open Meetings Law:** Such a massive policy change must be done with transparency at top of mind. This must include making meetings publicly accessible, allowing for public testimony, and allowing for remote participation.
- **The Traffic Mobility Review Board must outline clear metrics for success:** In order to show New Yorkers that this historic policy is reaping its intended results, the Traffic Mobility Review Board – or other responsible entity such as the MTA or DOT – must regularly track and publish key metrics underpinning the program’s goals, including publishing data on air quality, traffic congestion, bus speeds, traffic fatalities, and more.

- **The Traffic Mobility Review Board must clarify the definition of a vehicle transporting a person with a disability:** Not only is this of the upmost importance to ensure that people who have no choice but to use a vehicle can access one, but this also must be clarified to avoid potential abuse from those looking to evade tolls.

Congestion pricing will reduce congestion and travel times, improve air quality and street safety, and fund our transit system at never-before-seen levels. New York simply cannot wait for this program, especially given the recent increases in car travel. However, this program must not be turned on with just the flip of a switch.

New Yorkers and their transportation leaders must carefully weigh some of the most important details of this policy and the complimentary programs that must be implemented alongside it to make congestion pricing successful. To give just one example, prior to implementing congestion pricing in Stockholm, the city and its transportation agency purchased 197 new buses, created 16 new bus routes, built 2,800 regional park-and-ride spaces, and heavily invested in bicycle and pedestrian infrastructure. With congestion pricing fast approaching, we must begin discussions outlining New York's plans in earnest.

Thank you for your time and attention to this important matter. We look forward to working with you in making this historic program as successful as possible.

Mark Levine
Manhattan Borough President

[other signatories]