

**NYC Council Member Alan J. Gerson's
Position Statement on Mayor Bloomberg's Congestion Pricing Plan**

Traffic congestion in many parts of our city, especially midtown and lower Manhattan, poses unacceptably dangerous safety, environmental, economic and quality-of-life hazards. Mayor Bloomberg deserves credit for launching a long-overdue debate on this issue. Governor Spitzer and Speaker Silver deserve credit for creating this Traffic Mitigation Commission (TMC). Speaker Quinn and this commission deserve credit for carrying out an all-important discussion. The resulting report, however, is deeply disappointing. Significant sustained congestion avoidance and reduction requires focus on the various specific, localized congestion points and causes. It is unbelievable to me, that the TMC's staff report does not once mention the Canal Street corridor or the Holland Tunnel.

I repeatedly urged the commission to incorporate a focus on this hottest of traffic hot spots. The New York Metropolitan Traffic Consortium (NYMTC) has spent several years developing a Canal Area Traffic Study (CATS). One would think that any serious TMC plan would evaluate how to build on NYMTC's work and would propose resources to support and implement NYMTC's findings and recommendations.

Instead, the TMC focused almost exclusively on reducing Vehicle Miles Traveled (VMT's) on a gross basis throughout the Manhattan business area south of 86th Street. VMTs comprise an important, if not the most important, traffic reduction variable. But in the absence of area-specific analyses, we cannot properly evaluate alternatives, such as

different means of redirecting or reducing Holland Tunnel traffic. We also do not know whether a particular area will in fact benefit from an overall VMT reduction or whether special factors such as serving as a tunnel entrance and exit corridor render an area's traffic volume mostly inelastic to congestion pricing which reduces traffic elsewhere. This is especially the case with respect to the Canal Street corridor because the commission's plan does not impose any charge on commuters or the traffic from New Jersey. There is thus no disincentive for that traffic to change its pattern, even though, according to the commission staff, 24% of traffic into the Manhattan business district comes from New Jersey.

The proportion is probably higher in the area near the Holland Tunnel. We also have not considered after-hour traffic (after the proposed times for congestion pricing), such as whether the traffic in the Canal Street corridor between 6:00 and 8:00 PM and on weekends will get worse due to a shift of volume to post-congestion pricing hours. By not conducting sector-specific analyses, the commission further does not know if categories of businesses in particular areas--such as Chinatown's teetering retail shops and restaurants, become especially vulnerable to particular congestion mitigation measures.

Three additional flaws become apparent upon examination of the analyses undertaken by the commission to date: the overemphasis on revenue generation; the failure to consider needed mitigation of adverse impact from increase in commuter buses, proposed in

several schemes; and the lack of regard for the impact of different proposals on the integration and unity of the City.

Revenue generated from any traffic management must be reserved for mass transit improvement. But traffic management proposals should be evaluated solely on the basis of their traffic impacts. As the commission staff pointed out, a variety of methods, including many more progressive than congestion pricing, exist to raise needed transit money, including, but not limited to, a partial restoration of the commuter tax. Looking to revenue generation as a primary criteria for congestion pricing could cause the commission to give short shrift to effective congestion reduction measures that do not generate as much funding, such as car pooling requirements.

The near exclusive emphasis on VMT's treats miles traversed by large buses the same as those traversed by cars. Thus, proposed shifts from cars to buses, with the estimate of a substitution of one bus for twenty cars, generates a paper reduction of VMTs. However, one bus with squeaky brakes or a noisy engine is far noisier than twenty cars put together; a bus that does not use Ultra Low Sulfur Diesel, or the equivalent, will generate more air pollution than twenty cars; buses turning on some of our narrower streets can back up traffic far more than twenty cars turning on the same streets; inappropriate parking and idling by buses disrupts neighborhoods, creating barriers such as the bus blockade now existing along much of our East River waterfront, more than twenty cars. It is only reasonable and sound good government policy to generate requirements and policies to

mitigate those adverse impacts, including a bus route and parking management plan and low polluting fuel requirements.

Many of us over the years have become increasingly concerned about the widening stratification of our city, with parts of Manhattan becoming elite enclaves. Commission analyses have shown the relative progressivism of most congestion pricing measures. However, those analyses do not take into account the non-financial perception and actual experience of areas cordoned off by several congestion pricing schemes as socially apart from the rest of the city. To avoid this, all plans should aim to minimize the cordoning-off effect.

The aforesaid flaws, all in the form of omissions of important considerations, do not provide grounds for obviating all the good work done by the commission and its staff on their recommendations, which has brought us to a more promising place than our city has ever been for traffic management. Rather, those omissions call for enhancements and modifications of the work and proposals generated to date, in order to come up with the best traffic mitigation plan possible. I represent one of the districts entirely impacted by any traffic management scheme adopted. Accordingly, I have conducted five community town halls, in conjunction with our three community boards, on traffic management and the various proposals under your consideration.

Based on input received at those town halls and our subsequent analysis, I call upon the City Council and the State Legislature to modify the commission's recommendations with the measures set forth below:

- Establish as a follow-up to this commission a process to recommend traffic mitigation measures focused on the Holland Tunnel/Canal Street corridor within a time certain (six months). The best approach would seem to be to support and expand the mission of NYMTC'S CATS (Canal Area Traffic Study), to enable them to consider all possible, local and regional, mitigation measures. Resources from any congestion mitigation-generated funds must be reserved to implement the CATS recommendation.
- Require that any commuter buses or ferries serving Manhattan use ULSD and best available retrofit or engine technology to assure minimal or zero emissions.
- Prohibit large trucks (4 axles or above) from entering the catchments business areas, for at least residential and mixed-use areas.
- Minimize any camera infrastructure. This would seem to entail utilization of East River bridges, along with an uptown cross-town demarcation street, as portals, as recommended by the AIA (American Institute of Architects).
- Use camera technology to impose a surcharge for through traffic. It is estimated that 20% of all traffic that enters Lower Manhattan exits Lower Manhattan. A smaller surcharge should be added to travelers from west of the Hudson, who under the current plan, do not pay into the congestion-pricing fund.
- Eliminate congestion pricing fees for the following non-commercial off-peak travel (from 11:00 AM –3:30 PM): car pools with a driver and more than two

more passengers; persons with disabilities; vehicles of persons receiving or providing professional medical care. Providing incentives for car pools would further reduce congestion. Exemption stickers can easily be provided at park and ride lots.

- Avoid any intra-zonal fees, and double charges for persons leaving from and within the zone.
- Mandate a follow-up process for implementation of bus and truck management to assure routes, parking places, and times that do not exacerbate traffic congestion or pose other burdens on communities.
- Expand surface transit in the catchments area, especially cross-town service in Lower Manhattan, including restoration of the Grand Street area cross-town route, as recommended by the Lower Manhattan Development Corporation and community boards, and establish surface connectivity between the Financial district, the Seaport and Chinatown, as requested by the Chinatown Partnership Local Development Corporation.
- Continue the residential parking tax credit for long-term parking (one-month or greater). Doing away with this will produce more congestion with more cars looking for fewer parking spaces.
- The revenue generated should be utilized for the sole purpose of improvement of mass transit, with input from the City Council. A portion of any generated or city-advanced revenue must be available for immediate traffic management and public transportation improvements. This must include funds for traffic enforcement agents as well as surface traffic improvements. Traffic mitigation

measures should not, however, be primarily viewed as revenue-generating mechanisms. Need for additional funds for public transit improvements not met by the best traffic mitigation practices should be generated through one or more of the possible taxation measures set forth in the TMC's staff report.

- Implement permanent seven-day-a-week assignment of traffic enforcement agents throughout the Canal Street/Broome Street corridor, from east to west, at all major intersections along Canal Street, Broome Street, Grand Street and Houston Street. This should include reintroduction of Port Authority traffic police officers in the Manhattan vicinity of the Holland Tunnel.
- Evaluate implementation of expanded ferry service, trolley service and other new forms of transportation means.
- Implement a process to expand park and rides, with associated shuttle “shop or visit” service on the New Jersey side of the Holland Tunnel, and other peripheral areas. These should be organized with a view to alleviating congestion during weekends and other hours of congestion in Lower Manhattan and elsewhere not covered by the hours for other congestion mitigation measures.
- Any residential parking permit plan must include residential areas of Lower Manhattan and the rest of the central business district.
- The congestion-pricing rate for certain large trucks should be adjusted higher. As it stands the rate does not create an effective disincentive for certain large trucks to pass through Lower Manhattan in order to avoid tolls. Even if the current

prohibition on such trucks at the Holland Tunnel became permanent, the Lincoln Tunnel would remain an attractive alternative.