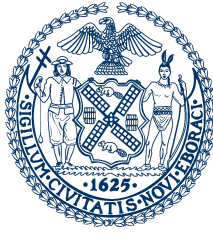


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Central Business District Tolling Program
Comment on the Environmental Assessment
September 23, 2022

As the City Council Member representing Council District 4 in Manhattan, I appreciate the opportunity to submit comments regarding congestion pricing.

I am the City Council representative for Central Park South, Carnegie Hill, Koreatown, Murray Hill, Stuyvesant Town and Peter Cooper Village, Sutton Place, Turtle Bay, Tudor City, Upper East Side, and Waterside Plaza. My district, which runs from 14th Street to 98th Street, is unique for representing both the Central Business District and the neighborhoods that reside just north of the tolling area.

I. Benefits of Addressing Congestion in the Central Business District

As a starting point, I want to speak in favor of a congestion pricing program for Midtown Manhattan, the area that I represent.

Congestion pricing is an opportunity to achieve our goals of reducing congestion, protecting our public transit infrastructure, lowering vehicle emissions, and making our neighborhoods more liveable. In recent years, we have seen the proliferation of delivery trucks and for-hire vehicles causing increased congestion in the central business district. The result is clogged streets and slower commutes for New Yorkers.

While many individuals may have different ideas of how a congestion pricing plan should be implemented, we all should share in the goals of improving mass

transit and lowering our emissions at an urgent moment. By lowering the amount of vehicles on the road, we have an opportunity to do that.

Similarly, the discussion comes at a time when we have a dire need to make essential investments in our public transit system. As a subway and bus rider, I know how much these investments matter to improving the daily lives of New Yorkers. When construction of the subway system began, it marked the beginning of an era that allowed New York to become the city it is today. Well over a century later, it is vital that we are actively maintaining that system and providing the necessary capital improvements to keep our subway running smoothly and efficiently.

The additional revenue stream for MTA capital improvements is one the primary benefits of the tolling program, by allowing New York to reinvest much needed funds from private cars to public transit. It is imperative that we have as effective a public transit system as possible in order to reduce carbon emissions—and that requires significant investment.

For all of these reasons, it's incredibly important that the program is a success and that we achieve the stated goals, while also ensuring equity in its implementation.

II. Concerns Related to Parking and Price Gouging in the Areas Adjacent to the Central Business District

As one of the few elected officials that represents constituents who live both within the CBD and immediately north of it, it is important to me that the final plan reflects the needs of residents on each side.

One of the issues of concern is the impact on the streets directly north of the tolling area, including the likelihood that this area will become saturated with drivers attempting to avoid the toll in the CBD. As we implement congestion pricing, we should prepare for the likely scenario that individuals looking to avoid a toll in Midtown will instead choose to utilize parking spots or parking garages in the surrounding neighborhoods.

Many have suggested that the proposed border of the zone in previous incarnations of congestion pricing of 96th Street would be a more appropriate demarcation.

If the borders of the CBD remain the same, increased efforts in enforcement of parking regulations or the exploration of a residential parking permit must be implemented to guarantee that the neighborhoods just outside of the CBD do not become magnets for commuter parking or delivery trucks looking to dodge the fees.

Without protections in place, I am concerned that the adjacent areas will inherit many of the issues that the congestion pricing program is attempting to prevent in the CBD.

III. Consideration for Residents within the Central Business District

The primary aim of congestion pricing is to reduce the number of individuals commuting into the Central Business District with their cars, which is possible because of alternative routes that exist for them to get into Manhattan. My constituents who live within the CBD and own a car are concerned that the tolling program could impact them inequitably if considerations are not made to address their needs.

For those who live immediately near the border of the zone, there are specific logistical scenarios that require your consideration for how payments are charged. Specifically, the proximity of residential buildings to the FDR Drive in my district might result in instances where my constituents could be charged the full congestion pricing fee for what would amount to a minute or two between transit from the highway to their homes. In certain instances, individuals live on the other side of the FDR from the congestion zone.

While the goal is to ultimately reduce the amount of vehicles being utilized in central Manhattan, there is an obvious need to be pragmatic in our approach to how to handle pricing on the border areas.

I have also heard some of my constituents who live below 60th Street in Manhattan but commute elsewhere, mostly beyond New York City, on a daily

basis. These reverse commuters often work in places inaccessible by public transit and have few options beyond either finding a new job or a new place to live. Commuters in the surrounding counties and outer boroughs can drive to transit, park, and then enter the CBD. Reverse commuters who live in the CBD but travel by car against the flow of traffic should not be penalized for their lack of alternative modes of transportation

In London, residents of the zone equivalent to our CBD are able to apply for [a 90% discount](#) on the congestion pricing fee. The TMRB ought to consider exemptions for residents within the zone who are not adding to the peak rush hour commutes into Manhattan.

I want to express my deep gratitude to all of you for your efforts on behalf of our city and state. I hope that you will consider these issues and the feedback from my constituents as you pursue a plan that will have a tremendous impact on the long-term health and equity of our city.