



**CITYSTREETS** is a forward-thinking, NYC based organization focused on improving the urban environment by exposing transportation policy flaws, their cultural impact on cities, and bringing much needed attention to pedestrian safety issues.

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**Congestion Pricing. Let's Clear the Air**

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PlanNYC unveiled by Mayor Bloomberg this past earth day contained 127 initiatives. One of the most interesting—and certainly the one that has received the most attention—was found in the transportation section and is called Congestion Pricing.

In the most simplistic terms Congestion Pricing is the notion that you can relieve automobile congestion in NYC by charging cars and trucks to enter Manhattan during commercial hours.

What should we do? Let's start by blaming Canada. Or specifically a Canadian born economist named William Vickery who while a professor at Columbia University, came up with the idea of using economic incentives to effect social behavior. To him we all owe a great debt, and some of us might soon also be owing him a smaller debt starting at \$8 a day for cars and \$21 for trucks to enter or leave Manhattan south of 86th street and \$4 for cars that start their trips in the zone.

The good news about Congestion Pricing is that a long overdue and necessary conversation about reducing automobile use in New York is finally taking place.

The bad news however, is that the plan as presented is not the right plan for New York.

Most Politicians have called the mayor's Congestion Pricing plan bold and visionary except for the one that counts, Speaker of the NY State Assembly Sheldon Silver. Apparently NYC needs Albany's permission to relieve congestion. Speaker Silver said that he wants to talk to people about it. He has admittedly taken a lot of heat for not reflexively following the herd mentality of his colleagues by suggesting that congestion pricing is not something that we should rush into without a serious discussion.

Silver may be talking about it, but he's certainly not involving the public in the conversation. This is unfortunate as there is a lot to talk about. The plan, which represents the biggest change to NYC streets since the removal of our beloved Trolley system is being sold simplistically as "you are either for it or against it" when a productive public conversation, could be, well, so much more productive.

Everyone seems to be behind the mayor's plan. The press, Good government groups, Even the Drum Major Institute, defenders of the middle class. Problem is, this isn't really the Mayors plan.

The plan that is widely credited as the mayor's plan is actually the plan of the New York City Partnership, a group that represents the city's most powerfully business interests. The lens that the plan uses for making the argument about congestion pricing is an economic one. The Partnership for New York City has spent hundreds of thousands of dollars on a report to determine that congestion is bad in NYC, and costs business money. Then, they hired an engineering firm who estimated the cost of congestion at about 13 billion dollars a year. While there is nothing wrong with looking at things through an economic lens, money has been known to obfuscate vision.

Not surprising their solution requires a multi-hundred million dollar engineering infrastructure for "a contractor yet to be determined" and also requires ringing the city with a network of surveillance cameras.

While the partnerships report is well intentioned, it also contains vague financial categories and some assumptions that we're not so sure about,

that massive proposed change is being based on which reminded us of something else professor Vickery had said.

"Much of the conventional economic wisdom prevailing in financial circles, largely subscribed to as a basis for government policy and widely accepted by the media and the public, is based on incomplete analysis, counterfactual assumptions, and false analogy."

At Citystreets our focus is a little more human, literally. What keeps up at night is worrying about pedestrian safety, which we see as a public health threat. We think the fact that 14,000 pedestrians are hit and injured by drivers of cars and trucks and about 150 killed every year is a more pressing "transportation" problem that needs to be addressed than the time it takes to cross town in a car. We also don't need to spend hundreds of thousands of dollars to model the cost of this carnage and tell you the public health cost is significantly larger than the cost of congestion, both in real dollars and quality of lives. We also are wary of a plan that seeks to speed up cars in Manhattan without first thinking about how this will effect pedestrian safety and the accompanying public health issues around vehicle and pedestrian collisions.

What the mayor has added to the plan, and why he can claim it as his own, is the formation of a transit financing authority. Called the Sustainable Mobility And Regional Transportation Authority, it is literally SMART. Considering planNYC contains 50 billion dollars in transportation capital needs, SMART is a smart way to have a funding source so that the city can issue bonds to pay for the proposed transit improvements.

What is also smart is how the mayor talks about the plan. He speaks with passion and with intelligence and urgency. He talks about congestion pricing as a way to clear the air. We're 100% with the mayor and we want to see less cars in our city and breathe cleaner air too. Precisely why, we feel the need to clear the air about this plan. Below are thoughts, suggestions, questions and insights based an analysis of the Congestion Pricing plan as it exists today and years of thinking about transportation in urban environments, specifically NYC.

#### **How will we know if the plan is going to accomplish what it promises if we don't know what it's goals are?**

Our initial criticism of the plan and one that we find deeply troubling is that the plan contains no strategic goals for vehicle reduction, emission reduction, or pedestrian safety. Except for an anecdotal comparison of the results in London there are also no estimates for the amount of congestion the plan will mitigate nor are there any estimates for the reduction of vehicle emissions. We feel that not to have a benchmark is unacceptable and propose establishing the following benchmarks.

- 1. Set clear goals for the decrease in number of cars coming into NYC.** Our opinion on this is that the time for incrementalism is over. If the point is to reduce congestion in New York, lets get down to it and do it. If it's not, then find another less complicated funding source for capital projects. If we are finally talking about reducing cars, let's also be honest and admit that allowing a million cars into Manhattan has been a decades long mistake and that it's too many cars. While we're at it let's also acknowledge that Manhattan is rich in public transit options which means many of these car trips are unnecessary and lets establish a number that we use a goal to change the relationships of our streets so that the millions of people that don't travel into Manhattan by automobile can be properly accommodated.



2. **Set clear goals for reduction in emissions.** If the point is to clear the air. Let's clear it. Let's build a mechanism into the plan that works to not just reduce vehicles but reduces the most polluting vehicles from our streets.
3. **Set goal for reduction of pedestrian fatalities and injuries.** We believe the said goal we should be working toward is zero pedestrian's deaths and injuries caused by motor vehicles. We have a long way to go and if the goal is to speed up cars on our streets we need to be thinking about the negative effects a plan to speed up cars and trucks can have on pedestrians and take steps to address this.
4. **Set goal for reduction of heavy and large Trucks.** Since we are talking about limiting vehicles that come into the city. Let's also admit that certain vehicles should never be in the Manhattan. Tractor-trailers come to mind. There should be a plan to reduce these vehicles on our streets. Preferably to zero.

**Only in New York. That means NYC is not like any other place in the world. So why is our Congestion Plan trying to copy London's?**

The NYC plan is modeled in many ways after the London plan so a discussion within that context seems appropriate.

Conceptually we don't like a plan that merely copies what London has done. London and NYC are competitors and we think we need to lead and not follow. We want a plan that London and the rest of the world will want to copy—and the world is watching. This is not that plan.

On a more practical level, the obvious difference between London and New York that the plan doesn't account for is that Manhattan is an island while London isn't. This is actually important as the obvious places to charge people to enter an island is at the place they enter the island i.e. bridges and tunnels.

And the plan that is being suggested requires an engineering investment in the hundreds of millions of dollars and the building of a big-brother type of network with the capabilities of monitoring all vehicles that enter the congestion pricing zone. While this makes sense for London, what makes sense for New York is to simply add high-speed EZ Pass Tolls to the East River Crossings that don't have them and then adjust the charges to achieve the desired goals.

When I asked one of the contributors to the partnership plan why it opted for a big brother surveillance system instead of putting tolls on the East River bridges I was informed that the partnership moved to this system not because it was the "best solution" but because it was the one that was politically feasible and the thinking was that putting charging points on the bridge was a political non starter with residents of Brooklyn and Queens.

We happen to believe that the residents of Queens and Brooklyn are as sick of congestion as everyone else in this city and are smart enough to know that they are being charged to enter Manhattan whether the point of payment is at a bridge or an exit off the FDR, or whether you call them charges or tolls. We also happen to believe that the with EZ pass this is much simpler than it might have been previously. It's a mistake to take this option off the table.

**Why discriminate through zoning; doesn't everybody in Manhattan deserves to benefit from Congestion Relief?**

The zone of the plan is also problematic. South of 86th street receives relief from congestion but north of 86th street doesn't? Aren't the residents of Harlem entitled to the same congestion relief that the residents of the Upper East and West Side are expected to receive? Also, we fully expect real estate prices to rise within the zone and think the residents of Harlem and upper Manhattan should benefit directly from this as well. It also makes no sense to us that any part of the loop roads of Central Park will be excluded from congestion zone.

More to the point congestion is a problem everywhere on the island of Manhattan. And since this is an island let's just treat it as such instead of carving zones within an island that will create all sorts of parking problems above the zone as people to seek to avoid charges.

While much has been said about the costs to enter Manhattan under the plan much less has been said on the credits that most drivers will receive.

"EZ Pass users paying bridge and tunnel tolls to enter the zone will be credited the amount of their round-trip toll that day".

What this means is that if you live in Brooklyn and drive to work using the Battery Tunnel the cost to you under this plan will be zero. Spending hundreds of millions dollars to implement a plan to charge people to enter Manhattan and reduce congestion won't work if you then decide not to charge them. In fact this part of the plan just doesn't make sense.

There are already tolls on the Hudson River Crossings and the East River Tunnels. The tolls are actually quite high and in fact comparable to the suggested congestion charges. And if you have ever tried to drive into Manhattan in the morning you are well aware they act as pretty much zero deterrence to drive into Manhattan as with them in place we have about a million drivers a day who think driving into Manhattan a day is a better choice than public transportation. And while I hate to admit it, many of them are right in making that choice.

**We're ready for a good Congestion Pricing plan. Is our transit system and infrastructure?**

As part of the research for Congestion Pricing I stopped driving and started commuting by bus to Ulster County on weekends. To see what a beautiful gateway to our city the Port Authority is and how much work is necessary to be done before we ask people to leave their cars at home and commute into the city by public transit, I recommend taking the 11:42 PM from New Paltz arriving into Port Authority at 1:30 AM on a Sunday morning. Or perhaps you should try to take the 6:00 PM leaving the city. You can even show up by Subway it's only a 7-minute subway ride to Port Authority from West 4th Street. But since there are no Metro Card like vending machines to purchase bus tickets I suggest you arrive early, as the lines can be long, I've waited in line more than 20 minutes just to purchase a ticket to the leave the city. Comparatively sitting in traffic starts looking like a reasonable alternative. I mean there are no people sleeping in your car that you have to step over to get where you are going. And the interior of new cars while often pungent tend not to smell like urine.

That said, the lowly bus, that many think of as something for people who can't afford cars, has a lot of potential. The busses are comfortable,



roomy and it's downright refreshing to not have to drive. But before you can realistically get people out of their cars, the experience has to be positive and currently it is sub-standard on many levels.

This is not a simple matter of busses leaving port authority but subways as well. In a recent report issued by New York City Transit is an articulation of what many subway commuters already know. Many subway lines are at full capacity. On the IRT there is literally no room to accommodate new riders. And in fact crowding is so bad on the east side IRT (4,5,6) that rush hours exceed the MTA's loading guidelines. According to this report it's just not the trains that are crowded but the tracks as well. While we need to reduce automobile trips into the city, the people that are going to get out of their cars need a way to get around. And to not put a system in place before this is figured out does not seem like a formula for success.

### **Congestion Pricing isn't just about cars, less cars, or the movement of cars.**

An important transportation insight, and one that makes the goals of congestion pricing possible (whether Sheldon Silver gives it his blessing or not) is that the answer to NYC traffic problems is an infrastructure problem and not a vehicle problem.

This is why in the past we have advocated that a lane on arterial streets be reserved for the use of vehicles responding to emergencies. The thinking is that this lane can then be utilized by human powered vehicles such as cyclists and rollerbladers and light zero emission electric vehicles, such as Segways and electric mopeds, during non-emergency use. With the allocation of just one lane on every avenue, we can provide the needed space to move around this city safely and efficiently using human or electric power. Obviously this will serve to lessen the amount of vehicles on the avenues and corresponding pollution as well and is aligned with the broader goals of Congestion Pricing. We envision that this will significantly reduce emergency vehicle response time and for this reason alone it should be tried.

One of the obvious outcomes of Congestion Pricing is the mitigation of urban auto trips. Initially this will be done mostly by bicycle but we can envision other mobility options. The reality is that whatever the preferred non automotive mode, there needs to be a safe way to move around the city and this is where infrastructure comes in. While it's not possible to build a new subway line in a month we can make our city safe for cycling in a short amount of time if we wanted to. And considering our subways are full this is something that absolutely must be done prior to congestion pricing being implemented in New York.

It is important to emphasize that making it safe to cycle in New York is not for the convenience of the small but vocal group of current cyclists but rather to exponentially increase cycling as a transportation mode in NYC.

An innovative solution to our problem of wanting to get people out of cars but not having capacity in public transit to accommodate them once they are out is to use technology to increase efficiency of private autos. It's hard not to notice that the amazing revolution in information and communication hasn't been applied to our transportation system. As an example the apple I-phone, which was released with much fanfare on June 29th contains built in Google maps, containing live traffic information, mobile Internet, and is one generation away from true GPS. This offers a glimpse into the potential of an application that can allow

people to easily find others going to the same place they are going and thus be able to share rides. Think of this as a form of e-hitch hiking. And by applying what we have learned with social networking and e-bay type user ratings, this can be made perfectly safe.

Coupling information and communication also opens the possibilities of being able to not only share rides but also reserve and pay for on demand light mobility systems. Think of kiosks of Segways, bicycles, and electric carts placed throughout the city available to pick up at one location and drop off at another, once our infrastructure allows for safe use. European cities are already well ahead of us with the adoption of hugely successful bicycle sharing programs. Most noticeably system in Lyon, a small city that is seeing 20,000 daily micro rentals. And Paris just green-lighted a citywide self-rent bike system with 20,000 bicycles and 1500 kiosks. There are companies trying to implement systems like this over here such as <http://www.intragomobility.com/>, and there are more than 5 startups in the Dynamic Ride Sharing Space. The Bloomberg administration should work with them and have the city act as an incubator, for what we need is a modern mobility system of which decreasing cars is only one component of.

Adding efficiency to our plan is the smart thing to do and with the subways maxed out also necessary prior to implementing a congestion plan in NYC. Such an innovative approach is something that also takes us from follower to leaders in transportation thinking and solutions. Additionally with a recent release of a report by the Union Of Concerned Scientists stating that with Global Warming NY faces 100 year floods—which will knock out the subway system—every 10 years the ability to increase surface efficiency takes on added importance.

### **There are exemptions to every rule. In the case of Congestion Pricing the nuances matter. A lot.**

What also has not been talked about in depth are the exemptions. The New York plan calls for exemptions for Handicapped license plates, emergency vehicles and transit buses, yellow taxis and livery cabs.

It is our belief that this exemption list is a missed opportunity to decide what types of vehicles we want driven in our city. Traditionally this has been decided by Detroit for us and since this is our City, having a stake in deciding what types of vehicles we drive is long overdue. We live in a dense urban environment and many of the vehicles that we bring into this environment are out of context. It inherently makes more sense to drive smaller lighter vehicles in our city and the plan should have a mechanism to facilitate a shift in the private vehicle fleet. It is thus our suggestion that all electric vehicles, as well as the super-compacts such as the Smart Car, Honda Fit, Scion A, and Toyota Yaris, to name a few, and Motorcycles below 350 CC and scooters should be exempt from congestion charges.

If the goal is to clear the air as the mayor says other mechanisms of the plan should address this. Taxis are a sensible place to start. We think it borders on lunacy that in 2007 the vehicles that we use as Taxis are predominately Ford Crown Victoria's equipped with gas guzzling and emission spewing V8 engines. These vehicles are dinosaurs that have no place in New York—or any city for that matter. The average life of a NYC taxi is 5 years and the Mayor has already required that all taxis be hybrids by 2012. We are suggestion that we jump-start this conversion by requiring that any exempt taxi vehicle be a hybrid vehicle. Furthermore we see no reason why Black Cars (radio cars) should be exempted from congestion charges. They should either be merged with



the Yellow Fleet so that the public can benefit from their presence and have the ability to hail them or be treated as the private cars that they are.

We also think that delivery companies such as FedEx, UPS & DHL, etc should be exempt from charges for delivering packages within the zone. These companies are crucial for large and small business and although they are private companies, in many ways they play the public role of mail carrier and this should be recognized. ConEd vehicles should also be exempt for obvious reasons.

Car sharing companies such as Zip Car, and rental companies such as Hertz, Avis, etc, having vehicles starting trips within the zone should also be exempt. The reason for this is that these services decrease the need for car ownership while increasing mobility options and thus deserve preferential treatment.

Another exemption we think is worth suggesting is for local farmers coming to farmers markets or making deliveries. The connection between food and the environment and living more sustainably is an obvious one that isn't made often enough. New York is surrounded by farms that are under severe pressure from low cost overseas producers, difficult growing conditions, and land development pressure. Our thinking is that anything that can be done to help the people that grow food we eat near us should be done.

Speaking of exemptions the city should use Congestion Pricing to not only reduce cars but also reduce dangerous drivers from our streets. It's not a secret that two demographics are responsible for a disproportionate amount of fatal crashes. Elderly drivers and younger drivers. So we propose that any resident over the age of 60 and all full time students be given free transit passes which when coupled with the congestion charges, will act to further incentivize these two groups to leave their cars at home.

**Not all congestors are created equal. Let's close the SUV loophole.**

Another issue that we think needs clarification is the term "automobiles" and "trucks". The plan as we all know calls for charging cars \$8 dollars and trucks \$21 but yet doesn't define cars or trucks.

All SUV's are classified as trucks to benefit from a federal loophole that exempts them from fuel and emissions standards. While we see a need for some cars in our city, we don't see a need for 8,000 lb. behemoths that guzzle gasoline and spew emissions. There is no reason for SUV's to be driven in Manhattan and thus we think congestion pricing is an opportunity to close this loophole that has a negative impact on NY. Since SUV's are legally classified as trucks we think they should be charged the higher truck rate, even if their steering wheels and cup holders are padded with leather.

And what about trucks carrying goods? Why is a gasoline sipping Sprinter van with a modern exhaust system and car like handling abilities considered the same as a diesel-belching semi pulling a tractor? They are not the same thing and should not be classed the same way. If the goal is to clear the air then lets adjust congestion charges of trucks to include, size, weight, engine type, emissions system. The range of possible trucks is just too large for them to fall under one classification so we need more than one.

This is good opportunity to get the ridiculous super stretch limousines that have started proliferating in recent years off our streets too. We suggest charging those by the inch.

**One thing we can learn from London: a plan for the people has to include the people .**

With any policy there are winners and losers. The winners outnumber the users and if possible the losers should somehow be made whole for their losses. Three obvious losers of the plan are Manhattan residents who own cars, businesses owners that keep delivery vehicles in Manhattan, and owners of parking garages. The residents lose because they have to pay to be in the zone even if they are just leaving New York, as they live here and have no choice so this just doesn't seem fair. The business owners in Manhattan already have much higher operating costs and are already paying a premium to be in Manhattan. And as so few Manhattan residents own cars and as Manhattan residents and business owners are not the cause of congestion, rather the cause is the vehicles that pour into the city everyday we think that they should be exempt. Exempting Manhattan residents and business owners who keep vehicles in the zone will benefit garage owners.

What we do like very much about the London plan has unfortunately not been included in our plan. Recently, at a talk titled "Learning Lessons from London on Congestion Pricing" At the Rudin Center for Transportation sponsored by The Drum Major Institute I heard first hand Nicky Gavon the Deputy Mayor of London and the Point Person on London's plan speak talk about London's comprehensive, transparent and public planning process.

London recognized that there are winners and losers took a bottoms up approach to talking to people. What that means is that met with people, in an organized planning process to learn what different constituents needs where and then they tried to address them in the fairest way possible to all people. The New York approach on the other hand has been a top down approach, with no public dialogue or input. New York really needs to have that dialogue before we move forward.

**Congestion Pricing is a good idea, the Mayor is right the time is now, The plan however needs work.**

Overall we're pleased with the proposal to try a pilot of Congestion Pricing and are excited to see ideas that can reduce the negative impacts of automobiles in our city implemented. We however think that as the plan was funded by powerful business interests that there are some built in biases and the plan should be adjusted to benefit the most amount of New Yorkers as possible. Congestion pricing is a sophisticated policy tool and this plan feels more like a hammer to us than a precise instrument. We have offered a number of suggestions that we think can improve the plan and also think that there needs to be an open and inclusive planning process so that all stake holders can have a voice in shaping the plan prior to it being implemented. We fully agree with the mayor that time is now for Congestion Pricing is now and are also cognizant that a larger setback to not than not having a plan to reduce congestion would be to implement the wrong plan. And whether the plan is approved in Albany or not, we should move forward with clarity, purpose and urgency to achieve the goals of congestion pricing. As part of the next phase we would like to see thinking that goes beyond limiting cars by thinking about our infrastructure in new ways to encourage and incubate new mobility ideas. It's important to realize that our goal is not to just limit cars but to design a modern mobility system that allows us move around in a way that is healthier for environment, that is also safe, affordable, easy, reliable—and of course the envy of the world.

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