

# Keep NYC Free

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## Keep NYC Free Comments on NYC Community Air Survey

The questions over the bike lane data that emerged on the Prospect Park lanes certainly makes one look at this data rather warily. Is the data any more accurate than with those bike lanes?

After reviewing the City Hall press release and the report from the Department of Health and Mental Hygiene and the Office of Long-Term Planning and Sustainability on the NYC Community Air Survey, Keep NYC Free offers several initial comments:

The press release and the report (which provides city-wide data but includes a brief section on Times Square as a “case study”) highlight a substantial reduction in nitric oxide and nitrogen dioxide readings (NO and NO<sub>2</sub>) between spring 2009 and spring 2010 at an air quality monitoring station immediately adjacent to the Times Square pedestrian plaza. They also note, however, no consistent decline in fine particulates. (Together, NO, NO<sub>2</sub> and particulate matter remain the most significant forms of vehicular pollution.)

Several factors make it difficult to attribute any real significance in the decline in NO and NO<sub>2</sub> readings.

**\*An increase in NO and NO<sub>2</sub> readings just before the plaza opened may exaggerate the size of the decline.**

The long-term gradual decline in these pollutants, especially as a result of cars getting cleaner, evidences a longer term trend independent of the installation of any plaza. The NYCCAS data, however, report a substantial increase in these readings at the Times Square monitoring site just before the creation of the pedestrian plaza. The sharp decline after the opening of the plaza may thus be due in part to the fact that the last pre-plaza readings were for some reason higher than usual. More time and further readings will be needed to determine whether the plazas contributed to any long-term change, or whether the Times Square readings will just return to the normal (that is, continue the downward) long-term trend line.

**\*The report provided No data on how the reconfiguration of Times Square affected air quality on the streets to which traffic was diverted.**

Even if the decline in NO and NO<sub>2</sub> readings represents in part a statistical anomaly, however, the data suggest that at least some of the decline was probably real. But it is important to remember that these readings are highly localized; if any significant reduction in the volume of traffic flowing through Times Square indeed occurred, it's perfectly logical (almost to the point of “duh”) that the readings at that particular monitoring site would decline.

The traffic simply diverted away from Times Square onto other avenues and streets received no apparent consideration and could represent a negative offset to any real gains if actual at Times Square. Neither the report nor the Mayor's statement provide any data on what happened to air quality on the most directly affected streets. Instead they compare readings at the Times Square site to the average readings at all Midtown monitoring sites. The report notes that after the opening of the plaza, average NO and NO2 readings for all Midtown sites declined slightly – as if this proves that the re-routing of traffic had no adverse impact elsewhere. That suggests that for Midtown as a whole the long-term, gradual downward trend in automotive pollution continued regardless of any City actions at Times Square.

The question of what happened on the directly affected streets beyond Times Square remains particularly important because the City's reconfiguration of Times Square included the re-routing of buses. In its discussion of city-wide air quality patterns, the NYCCAS report notes that high levels of NO, NO2 and particulates are strongly correlated with bus routes. So part of the improvement in Times Square may simply reflect a shift in bus pollution to other streets.

**\*No discussion other changes that could have affected air quality.**

As the NYCCAS report notes, vehicular traffic remains just one of several sources of these three types of pollution. (High-rise buildings, for example, are another major source.) To accurately evaluate whether and to what extent the reconfiguration of Times Square has improved air quality in the area, the City would need to examine what other changes might have occurred – either in overall traffic volumes or in non-vehicular sources -- that could have affected NO, NO2 and particulate levels in Times Square. These might for example include fewer people working in the area, higher vacancy rates in commercial office buildings, changes in types of fuel used, etc.

Instead, it appears that the City opted to focus on just one factor – the reconfiguration – and attributed the decline entirely to that change.

In its conclusion, the NYCCAS report focuses on some implications for public policy. It acknowledges the need for action on both vehicular and structural sources of pollution – but after citing in general terms some recent City initiatives on buildings, it quickly focuses on vehicles. Ignoring that fact that vehicular pollution declined dramatically during the past several decades, and continues to decline, the report says:

*Traffic-related pollution presents a greater challenge; trucks, cars and buses are all significant contributors....Changes in vehicles themselves, however, will produce slow progress at best. The number of private automobile trips must decrease in favor of public transit, biking and walking...*

The report offer NO analysis that supports its assertion that the primary focus should be on vehicles rather than buildings – or its assertion that reducing private auto use should take priority over making trucks, buses and cars cleaner.

And it doesn't address at all the relative costs of these strategies in economic or financial terms.....But never mind – we can all see where this is heading.