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September 9, 2022

Honorable Kathy Hochul
Governor
State of New York
633 3rd Ave
38th floor
New York, NY 10017

Dear Governor Hochul:

We are writing to ask that you withdraw your support for the Metropolitan Transportation Authority's (MTA) "Central Business District Tolling Program."

The Environmental Assessment (EA) released by the MTA on August 10th makes it clear that the only objectives of the Central Business District Tolling Program (CBD) are to 1) reduce the miles vehicles travel within Central Manhattan by five percent; 2) reduce the number of cars coming into Central Manhattan by 10 percent; and 3) create a significant new funding source for the MTA. To create this marginal traffic benefit to Manhattan residents living within the proposed central business district, the CBD tolling program would charge an exorbitant toll for driving, which would effectively redisperse traffic congestion across other parts of New York City and the tri-state area, rather than reducing overall traffic. This toll, along with the negative environmental and financial impacts of this increased traffic in their communities, would disproportionately harm low and middle-income outer borough residents. Furthermore, at no point does the EA provide any conclusive evidence that this program would provide a source of revenue that is a stable and sustainable, nor does the MTA commit to specifically improving public transportation in areas of the city where it is significantly lacking.

What is most telling is that, in attempting to ascertain the impact of the CBD on New York City and the region, not once do authors of the EA cite the lessons learned from London, a city that has employed a nearly identical congestion pricing program for 20 years. That is likely because doing so would not support their sanguine conclusions, ***since London is now the most congested city in the world***, according to INRIX, a leading worldwide traffic analytics firm (see Inrix Global Traffic Scorecard, 2021). Certainly, we should be skeptical if we are copying

a congestion pricing program that, after two decades, has resulted in far worse traffic than New York City currently experiences.

The Potential Benefits of the CBD Tolling Program are Being Oversold

Much like their counterparts in London, those pushing the CBD tolling program as a traffic cure all are seriously (and maybe purposely) overestimating the effects of economic incentives on people's driving habits. This program rests on the assumption that a significant number of people really are making a conscious choice about driving, rather than doing so out of necessity or expediency. Yet evidence from London's congestion pricing experiment suggests that the population that will get out of their cars and use other modes of transportation because of an extra charge to drive is very small. **According to data from London's Department for Transport (DfT) data, there are 5 million more vehicles on London roads than when the congestion pricing was first implemented 20 years ago.** That's a near 20 percent increase in people choosing to drive. That is a sea change in transportation behavior, just not the one that purveyors of London's congestion pricing program were selling.

Studies of the 25 largest cities in the world have found that what gets people out of their cars is proximity to viable public transportation. There is an inverse correlation between the number of people who live within a short distance of a bus or train stop and the amount of traffic and congestion, regardless of the cost of driving. In other words, congestion pricing benefits the few, fortunate residents who have the privilege of choosing between driving or a short walk to a train station, while most others are simply stuck paying the high toll of driving.

Spillover Traffic Will be Devastating

Once again, we should look to London, where the clogged main and arterial roadways across the city have had a particularly deleterious impact on communities outside the congestion pricing zone. **Spillover traffic and motorists trying to avoid congestion now take circuitous routes through residential areas across the city and in neighborhoods in Outer London – what locals pejoratively call “rat running.”** Rat running has led to traffic in otherwise quiet, arterial roads to double in the decade between 2009 and 2019, according to DfT data. The problem has gotten so bad that many borough officials began taking matters into their own hands, embarking on a new car-reduction plan called Low Traffic Neighborhoods by erecting barriers to prevent outside motorists from using their streets.

The EA supports this:

- Those travelling outside the CBD will see no reduction, and likely higher traffic volumes, despite the overwhelming number of New Yorkers who face congestion in Brooklyn, Queens, Staten Island, the Bronx, Nassau,

- on Long Island, the Hudson Valley, New Jersey, and Connecticut. In fact, even the optimistic data within the EA, shows traffic overall getting worse for Long Island, New Jersey, and Connecticut. In sum, the people who will pay the price get worse traffic. (Table ES-4)
- Mid-day and PM traffic volumes approaching the westbound George Washington Bridge will result in additional traffic throughout its northern Manhattan and South Bronx approaches. (4B-21)
 - The EA estimates this will double pedestrian volume at already overcrowded NYC Subway stations in and around the central business district. (Table ES-4)

The CBD Tolling Program is a Regressive Tax

This tolling program will have little impact on the day-to-day life of wealthy commuters or residents within the Manhattan CBD. But the vast majority of the 1,856,000 people who enter the CBD by car each day – working- and middle-class residents of the outer boroughs and suburbs - and will now be forced to pay for these fortunate few. That is far greater than the entire population and beneficiaries living within the CBD. (EA Page 1-13). Even the EA begrudgingly admits, ***this toll would disproportionately impact on low-income New Yorkers, making this program a new regressive tax. (Table ES-4).***

Other EA findings:

- The amount of total vehicle miles traveled throughout the 28-county study area will be reduced by between 0.2% and 0.4% by implementing any of the tolling scenarios as compared to taking no action, and by 2045, that number will only climb to a maximum of 0.5% at best. Meaning, it is a \$1 billion annual tax on the region, without any regional benefit. (Table 4A-6, 4A-7 & 4A-14)
- The increase in daily commuting costs for auto drivers from New York City outside of the CBD will range from 7.9% to 37.2%, most significantly impacting lower income and minority drivers. Increases to Long Island, Hudson Valley, New Jersey, and Connecticut drivers will range from 5.8% to 26.5% (Table 4A-18)
- Drivers from New York City outside of the CBD can possibly face total daily tolls of up to \$38.20, with the tolls having a disproportionate effect on low-income families (Table 4A-19)
- No alternatives to generate \$1 billion in revenue other than car-related fees were considered by the MTA that could spread the cost out more equitable and progressively through the regional population.

The CBD Tolling Program Could Have Disastrous Health Impacts

The EA estimates the CBD Tolling Program would increase dangerous atmospheric pollutants – particulate matter, nitrogen dioxide, carbon monoxide, and volatile organic compounds – for Staten Island and the Bronx (Table 10-8). Considering the predicted increases in spillover traffic, particularly the hundreds of new trucks expected to fill the roads in these boroughs each hour, these estimates are laughably low and defy common sense (Table ES-4).

Even so, these estimates are troubling, especially when you look at the effect London’s congestion pricing has had on air pollution in Outer London and its suburbs over the last two decades. ***The toxic air pollution being caused by the increased traffic there is leading to nearly 4,000 premature deaths a year and children being born at lower birthweight, stunted lungs, and higher incidences of asthma***, according to a recent study by the Imperial College of London.

Other concerning EA findings:

- In every scenario, Staten Island will see more congestion from personal vehicles and trucks on highways and local streets. (Table 4A-25 & 4A-26)
- In every alternative, the Bronx will see more traffic from thousands of additional commercial trucks, and in almost every scenario, the Bronx will see more traffic from personal vehicles. (Table 4A-28 & 4A-29) Most of this additional traffic will be ***on the Cross Bronx Expressway, which has the distinction of having some of the worst asthma health outcomes in the nation.***

Congestion Pricing Is Not a Budget Unicorn

Congestion charge payments in London accounted for £232m (about \$275 million) in revenue in 2021, or less than four percent of the total revenue for Transport for London (TfL), the city’s public transportation agency. Those figures came in after Mayor Sadiq Kahn increased the daily rate from £11.50 to £15 (\$13 to \$17.75) and adjusted the operating hours to include 6PM-10PM and weekends to try to boost the agency’s income. The city’s congestion charge has failed to generate enough revenue to help TfL survive a precipitous drop in ridership and an economic downturn. The agency recently needed a \$6 billion bailout from the federal government just to stay afloat.

Considering London’s significantly higher traffic volumes, there is no chance the CBD Tolling Program would come close to generating the \$1 billion MTA is projecting in the EA – especially when that figure does not incorporate exemptions that are being considered for New Jersey drivers, for-hire vehicles, and others. Given the MTA’s long, notorious history of fiscal mismanagement, cost-overruns, and failures to meet even the most generous project deadlines, it is simply magical thinking that the CBD Tolling Program will fix the agency’s budget woes or improve public transportation options for communities with few transit options.

Given all of these factors, to say that the Central Business District Tolling Program is problematic is an understatement: It is a disaster waiting to happen. We cannot in good conscience support a project that would be so harmful to so many New York City residents, and as leader of this state, we urge you to reconsider.

Thank you for your time, courtesy, and consideration.

Very truly yours,



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