KEEP NYC CONGESTION TAX FREE

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Testimony to the NYC Traffic Congestion Mitigation Commission
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From the day of Mayor Bloomberg's Earth Day controversial announcement in April 2007 proposing that the City establish a congestion pricing scheme on most private vehicles traveling below 86th Street in Manhattan, *Keep NYC Congestion Tax Free* has vigorously opposed and questioned the equity, efficiency and economic sense of this stalled plan. While the Mayor has called much-needed attention to the problem of traffic congestion and sparked a lively public discussion, the rigid all-or-nothing congestion tax scheme stands in stark contrast to cost-effective, efficient, fair and practical alternative plan proposed by Keep NYC Congestion Tax Free.

Our analysis identifies the primary flaws in the City's congestion pricing scheme: its indiscriminate taxing of all vehicles; its failure to focus on the root causes of traffic congestion, such as the unnecessary cruising of yellow-medallion taxis; its undervaluing of on-street parking and bridge and tunnel crossings during peak periods; its proliferation of black car services; its perpetuation of an out-of-control City-issued parking placard and permit system; its inadequate traffic enforcement; and its permissive attitude toward the 10,000 trucks that enter Manhattan every day with no point of origin or destination.

Our *Alternatives Approaches* more effectively targets the root causes of congestion in Manhattan's central business district. It also achieves a greater traffic volume reduction than the City plan claims for itself. This means Alternative Approaches also exceeds the guidelines imposed by the Urban Partnership Agreement between the USDOT and New York City, New York State and the MTA.   And most importantly, unlike the city plan, it generates hundreds of millions of dollars annually in new revenues for mass transit. These A*lternative* A*pproaches* also satisfy the requirements to qualify for the federal anti-congestion funding; and it does this without the costly and elaborate infrastructure involved with the city's congestion pricing scheme.

Let's look at some of the key elements of this Keep NYC Congestion Tax Free alternative that, unlike the city plan, truly addresses the problems posed by congestion in New York City:

✔ ***Value pricing for curbside parking in the Manhattan CBD***. This will sharply reduce the number of "free" on-street parking spaces in commercial areas of Midtown and Lower Manhattan and increase the price of on-street parking.

✔ *Major reform of the City's system for issuing parking placards to City employees, and for regulating their use.* This involves limiting placards to those who need them for job-related purposes, ending illegal parking by placard-holders, and encouraging public employees to use mass transit.

✔ *Greatly expanding the number of taxi stands in the Manhattan CBD, along with other measures to reduce the time cabbies spend cruising for passengers.* Cruising alone accounts for approximately 13 percent of all-vehicle miles traveled (VMT) in the CBD.

✔ *Implementing variable pricing on existing tolled crossings serving the CBD and restoring two-way truck tolls on the Verrazano-Narrows Bridge*. This involves increasing MTA and Port Authority bridge and tunnel tolls, incorporating variations in pricing by crossing and by time of day; and removing the existing incentive for trucks heading to New Jersey from Long Island, Queens and Brooklyn to travel through the Manhattan CBD by restoring two-way tolls on the Verrazano Bridge.

✔ *Increasing fines and more aggressive enforcement for the types of parking violations that contribute most to congestion in the Manhattan CBD*. This includes higher penalties for double-parking, parking in bus stops or loading/ unloading zones, etc.), coupled with more aggressive enforcement and legislation that strengthens the City's ability to enforce existing rules against "blocking the box."

✔ *Reducing congestion caused by "black cars" and non-yellow for-hire vehicles* . This includes a targeted campaign against parking and other violations for these vehicles contribute to congestion; and exploring the feasibility of creating designated parking zones for these vehicles.

✔ *Modernizing traffic signals in the Manhattan CBD.* This will enable NYCDOT to manage the flow of traffic more effectively through "real-time" adjustments to signal timing.

✔ *Implementing 511.* This travel information service delivers traffic, transit and weather information directly to a telephone, cell phone or electronic device.

Why not rely on these real and better alternatives to reduce traffic congestion more effectively and comprehensively without any need to implement a drastic plan which will disrupt the lives of many residents, senior citizens, working people and small businesses in our City? Keep NYC Congestion Tax Free urges each member of the New York City Traffic Congestion Mitigation Commission to fully review these and all alternative approaches before making any recommendations that will adversely affect our mass transit system and residential neighborhoods.

Why not turn to the mitigation alternatives identified in the *Alternative Approaches* report that could generate approximately $428 to $545 million, without major capital investments or increases in operating costs. (The proposed congestion pricing scheme will require a minimum investment of $233.6 million and yearly operating costs of $240 million. Approximately 40 cents out of every dollar charged for congestion pricing will be lost to operating overhead)?

Much of the allure attached to the the congestion tax comes from being wrapped within PlaNYC. I often liken that scheme to a mango's pit. Just because you find something sweet on the outside doesn't mean you face nary a risk when you bite down inside.

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[Read the report at http://keepnycfree.com/reports/files/2007-10_Alternative_Approaches.pdf]