



Dear Chair Weisbrod and Traffic Mobility Review Board Members,

With the first public meeting of the Traffic Mobility Review Board (TMRB) occurring today, July 19, we are asking the TMRB to review the following opportunities to improve implementation of the Central Business District Tolling Program (CBDTP). These proposals serve to protect the goals of congestion pricing policy, while also ensuring the program will not overburden Manhattan residents.

Hundreds of constituents have contacted our offices regarding the CBDTP. From their feedback, we have provided six meaningful steps for implementation within the TMRB's power:

1. Exclude any credits for bridge and/or tunnel travel into Manhattan

MTA officials have publicly expressed considering exemptions from congestion pricing fees for those who enter Manhattan via tolled tunnels or bridges. Other suggestions have included providing credits amounting to part of the total bridge and/or tunnel toll, while still charging the full congestion pricing toll. These proposals run counter to the stated aims of the program, and severely undermine its effectiveness.

Such credits or exemptions would encourage the longest motor vehicle trips, which are most detrimental to the environment, while raising costs for residents. We find the consideration of these options unconscionable, and believe they would severely undermine the intent of the program.

2. Significantly discount personal vehicles from fees on weekends and holidays

Our transit system is primarily designed to get people to and from work during weekdays and can pose challenges to people visiting their houses of worship, a little league field, or various other destinations which are more frequented on the weekends. A variable tolling schedule which charges drivers a significantly reduced amount for travel on weekends and holidays — when the MTA reduces service — would align with the stated policy goals of this program, as well as requirements that the program allow for peak and off-peak tolling.

London's 'congestion charge plan' limits toll hours on Saturdays, Sundays, and holidays, and Mayor Bloomberg's initial proposal for congestion pricing fully excluded weekends.

Overall driving is significantly reduced on weekends and the MTA's proposed cost structure already includes discounts on off-peak times; thus, any loss in revenue from these discounts will be comparatively small, and can be made up elsewhere with minimal impact. Charging for use of the Central Business District on non-business days unfairly burdens residents that will already bear the brunt of costs.

3. Do not charge low-income drivers up-front

Drivers who report an income below \$60k in the previous tax year, and expect to be below it in the current year, should not be expected to cover the fee while they wait for a tax credit at the end of the year. Individuals who make below \$60k and qualify should automatically have their license plates registered so they are not charged congestion fees. Those who fall below the \$60k income threshold, after having been above the year prior, should still be able to use the credit come tax time.

4. Expand the definition for disabilities exemption

The CBDTP exemption for people with disabilities applies only to vehicles with disability license plates, and fleet vehicles owned and operated by organizations transporting people with disabilities. This definition leaves out many people with permanent or temporary disabilities who rely on cars to get around. The TMRB should broaden the definition of people with disabilities to align with the federal definition in the Americans with Disabilities Act: "a person who has a physical or mental impairment that substantially limits one or more major life activities, a person who has a history or record of such an impairment, or a person who is perceived by others as having such an impairment."

Given the number of medical institutions located in the CBD, the exemption should also include temporary disabilities or mobility issues. Disability license plates and Access-A-Ride applications take too long to process to be feasible avenues for people with temporary issues.

5. Discounts for Electric Cars

Electric cars should receive discounts on CBDTP tolls, as they do not contribute significantly to the smog and pollution of the Central Business District. While they do cause congestion, and thus should share in the responsibility of any program, their reduced environmental impact should be compensated, given emission reduction is a core tenant of this program's intent.

London's set of fees similarly has lower rates for electric cars. To the extent possible, this program should incentivize drivers to use greener vehicles.

6. Identify explicitly which MTA improvements will be funded by the CBDTP

Though this is not the direct responsibility of the Board, we urge all involved in the tolling program to specify which MTA improvements are being made with the \$15 billion in bonds that the program aims to support. While the MTA 2020–2024 Capital Plan laid out \$54.8 billion in investments, it did not explain to those who will pay congestion fees what specific improvements are being funded by this new revenue stream.

Being explicit about which improvements would be cut if the CBDTP did not exist will both impose accountability on getting those projects done, and give drivers paying the fee confidence in their money being well-used. As the board considers input when setting rates, they should ask the MTA to provide this explicit plan.

We appreciate the difficult task the TMRB faces in deciding upon the final details of this program, and know board members are navigating competing input from numerous stakeholders. We hope these proposals will be sincerely considered as the final rates are decided.

Sincerely,



Assemblymember Alex Bores, 73rd District



Manhattan Borough President Mark Levine



Senator Liz Krueger, 28th District



Senator Brad Hoylman-Sigal, 47th District



Senator Kristen Gonzalez, 59th District



Assemblymember Deborah Glick, 66th District



Assemblymember Rebecca Seawright, 76th District



Assemblymember Harvey Epstein, 74th District



Assemblymember Eddie Gibbs, 68th District