



**STATEMENT TO NYC TRAFFIC CONGESTION MITIGATION COMMISSION**  
**American Institute of Architects, New York Chapter**  
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Perhaps the boldest transportation proposal outlined in the City's forward-thinking PlaNYC vision to prepare for sustainable growth for the City's future is the stated commitment to traffic congestion relief through a 3-year congestion pricing demonstration project within a defined congestion zone below 86th Street in Manhattan. Citing London, Stockholm and Singapore as models for this market-based system, the City has established a goal of reducing vehicular traffic by 6.3% within the congestion zone. Capital costs to start up the system would be provided by a grant from the US Department of Transportation and City and State funding. Among the start-up costs are near-term transit improvements such as increased bus service to areas currently underserved by mass transit. Revenues generated by the congestion charge beyond the system operating costs would be reserved for a mass transit capital improvement fund.

The elegance of the concept of congestion pricing is that it simultaneously discourages inefficient use of the road and bridge network, encourages more efficient modes of transportation, reduces energy use and air pollution from vehicular use and provides a reliable mechanism to fund improvements to the mass transit system. Significant externalities such as the recapture of enormous costs attributed to traffic congestion and measurable improvements to the health and quality of life of residents and workforce have been identified. Indeed this concept is the key to providing a comprehensive transportation strategy which addresses current limitations as well as growth for the City.

Acknowledging the challenge of responding to many constituencies to gain the needed State approval, the Traffic Congestion Mitigation Commission should remain flexible and open to suggestions that could make the strategy more effective. Recent studies have shown that suggested alternatives to congestion pricing such as license plate rationing, truck reduction strategies and traffic management enhancements would not achieve the traffic reduction goals achievable with the City's congestion pricing strategy. However, consideration should be given to variations of the City's proposed strategy in order to minimize potential negative impacts. These could include the following.

- Simplify the detection system to reduce operating costs and provide a more understandable congestion zone system for the public. This can be achieved by shifting the congestion zone portals to the East River bridges and tunnels along with a demarcation line across upper Manhattan – 86<sup>th</sup> Street has been recommended by the City.
- Examine all boundary zones to assure that there is not an inequitable increase in adverse traffic impacts to surrounding neighborhoods. Parking regulations such as parking permits in residential neighborhoods and Muni meters in commercial neighborhoods should be evaluated.
- Consider variable or dynamic pricing – not just a flat cost during the effective charging period – in order to spread traffic more evenly across non-peak hours.
- Establish clear urban design goals with the intent of reducing the visual impact of the detection equipment and other potential negative impacts. The City has suggested that a gantry support structure similar to

what has been used in Stockholm and Singapore could be used. This has a very significant visual impact to neighborhood streets and could work much better at a limited entry portal such as a bridge or tunnel approach.

- Establish a congestion surcharge for taxis operating within the congestion period. There is already a precedent for this with the peak-hour surcharge. This reinforces the principle that the benefits of using the public street should be offset by a reasonable cost.
- Evaluate using congestion pricing to encourage the use of more efficient vehicles. London has proposed a system with a sliding scale of congestion fees based on the vehicle fuel efficiency.
- Evaluate the congestion pricing structure to encourage the use of mass transit for reverse commuting.
- Evaluate other congested business cores such as downtown Brooklyn as potential congestion pricing zones.

A process has been established to recommend a final congestion relief strategy (“Implementation Plan”) starting with the NYC Traffic Congestion Mitigation Commission recommendations followed by approval of the proposed strategy by the City Council and State Legislature. This process should be conducted using the most reliable, objective data along with public input to achieve a fair and equitable outcome.

It has been suggested that an action with the potential for negative impacts such as this should be subject to the State and/or City environmental review process. Perhaps the 3-year demonstration period could be structured to satisfy this point of view. Whatever the decision, this question should be resolved early to avoid the potential for a legal roadblock to implementation of an approved plan.

Finally, the “Implementation Plan” should include provisions that assure that funding generated from congestion pricing be reserved for capital improvements to remove the temptation to divert funds to operating costs to avoid future fare increases.

Considering all of the above, it is critical that the City and public focus on achieving the goals set out for congestion pricing in a truly effective and politically feasible way.

Thank you for the opportunity to express the views of the AIA NY Chapter.

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