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July 18, 2023

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Dear Members of the Traffic Mobility Review Board:

The Citizens Budget Commission (CBC) has long supported congestion pricing to further three important goals: reduce congestion, reduce emissions, and support the MTA's capital plan. We urge the Board to follow CBC's five recommendations, listed below, to ensure balanced progress on all three goals.

Many stakeholders will recommend additional credits and exemptions, pricing options, and ways to address pre-existing issues within congestion pricing. We urge you to recommend keeping the system and its implementation as clear and simple as possible to ease implementation and ensure that the benefits are balanced among the three goals.

Furthermore, we urge you to recommend a system that can adapt over time, by tracking and analyzing real-world data and setting the expectation that the system's pricing structure will be refined as warranted based on experience.

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CBC recommends that the Traffic Mobility Review Board recommend to the Triborough Bridge and Tunnel Authority:

- 1. Limit exemptions to transit providers, those specified in the law, and those agreed to in the Final Environmental Assessment.** Proliferating exemptions could reduce the program's ability to achieve the above stated goals and risk the program's support among those who pay higher charges. Results should be monitored over time and fee schedules adjusted as warranted to maximize progress toward goals.
- 2. Do not provide credit for payment of MTA or Port Authority of New York and New Jersey (PANYNJ) tolls.** Credits will increase the congestion charge for drivers required

to pay, given the law's \$1 billion annual revenue mandate. While toll shopping among these facilities should be addressed, doing so through credits to the congestion charge would increase the program's complexity and significantly increase the congestion toll paid by other travelers.

- 3. Vary the congestion charge by time of day and day of the week, and ensure the charge is easy to understand and well communicated.** Clear and timely communication will enable drivers to know how much they would pay for different trip times and to modify their trips, as the law intends. Avoid dynamic pricing that rapidly changes the charge based on vehicle levels in the zone, which would make it hard for drivers to plan ahead or to adjust plans and may engender public backlash.
- 4. Consider charging a vehicle-miles travelled (VMT) fee for those that stay inside of the zone.** While a VMT fee for in-zone travel may not be feasible for the initial launch, in the future, it would help meet the program's goals and remove in-zone vehicles' de facto exemption from the charge.
- 5. Monitor and report congestion pricing outcomes and operational metrics to inform future policy adjustments.** Adjustments should be considered at regular intervals to ensure the program is meeting its revenue, congestion, and emissions goals. This should include an evaluation of limiting taxicabs and FHV to one charge per day, as agreed to in the environmental assessment, which will increase the charges on other payers and may shift more trips to these vehicles rather than mass transit, reducing the program's progress toward its goals.

As CBC detailed in "[Getting the Pricing Right](#)," the effective implementation of congestion pricing targets congestion, emissions, and revenue together—not just revenue alone—in a fair and sustainable manner that limits exemptions and maximizes social benefits.

CBC supports the speedy implementation of congestion pricing to reduce congestion and emissions and to improve transit for all New Yorkers.

If we can be of any additional service, please feel free to contact us.

Sincerely,



Andrew S. Rein
President
Citizens Budget Commission

Cc:

Janno Lieber, Chair and CEO of the Metropolitan Transportation Authority