INSTITUTE FOR RATIONAL URBAN MOBILITY, INC.

George Haikalis President One Washington Square Village, Suite 5DNew York, NY 10012212-475-3394geo@irum.orgwww.irum.org

September 23, 2021

CBD Tolling Program - CBDTP@mtabt.org 2 Broadway, 23rd Floor New York, NY 10004

IRUM Comments on Manhattan Central Business District Tolling Program

IRUM is a NYC-based non-profit concerned with reducing motor vehicular congestion and its excessive, greenhouse emissions and improving the livability of dense urban places. IRUM has long supported congestion pricing as an important element of a "comprehensive street use plan" to reduce vehicle miles of travel in the crowded core of the Manhattan Central Business District. IRUM submitted the following comments at the March 19, 2019 hearing hosted by Manhattan Borough President Gale Brewer on her Manhattan Congestion Pricing Plan:

https://www.irum.org/20190319_Statement_MBP_Brewer_Hearing_on_Manhattan_Congestion.pdf

These comments included a map of an alternative street use plan for the Manhattan CBD, which should be considered in the current planning process required by USDOT to advance a congestion pricing plan. IRUM's plan would start with *vision42* - an auto-free light rail boulevard on 42nd Street – as a prototype for a whole grid of auto-free light rail streets that would make sense in Manhattan, the nation's most crowded urban place. The grid would be part of a much broader transport plan – including congestion pricing, market-based curb parking, more frequent subway and regional rail service and integrated, reduced transit fares -- to improve the livability and economic vitality of NYC and the region.

Another important element of the NYC congestion pricing plan should be consideration of a more productive use of the region's *sleeping giant of metropolitan mobility*, its three commuter rail lines. A fresh opportunity to develop such a plan should spring from the recent commitment by the Governors of New York and New Jersey to help fund much needed doubling of new Hudson River passenger rail capacity. The two Governors should direct the PANYNJ to lead this effort, focusing on the completion of a track connection linking existing tracks at Penn Station and Grand Central Terminal, permitting "through-running" of key commuter rail lines, and the establishment of an equitably-priced Central Fare Zone that would make these underutilized rail lines more affordable:

https://www.irum.org/20190115_Why_PA_Should_Support_Regional_Rail.pdf

Finally, Eric Adams, Brooklyn BP and a front-runner for NYC's next Mayor, has proposed making all public transit *free* in NYC. IRUM analyzed this concept in 2008 in a study funded by the Kheel Foundation, and it should be considered as part of the planning for the NYC congestion Pricing Plan:

https://www.irum.org/20080123%20-%20Kheel Report.pdf

While asking motorists to pay a fair share of the cost of maintaining and upgrading the region's public transit system is essential, it is important to note that well-off owners of property in the Manhattan CBD should also contribute to the cost of providing these "horizontal elevators" - the subways and railways - not unlike their vertical elevators that are essential for them to prosper in a very dense setting.

Sincerely,

George Haikalis, President, IRUM