



September 23, 2022

Traffic Mobility Review Board
Central Business District Tolling Program
2 Broadway, 23rd Floor
New York, NY 10004

Re: Congestion Pricing Program Proposal - Chamber of Progress Public Comment

Dear Members of the Traffic Mobility Review Board:

On behalf of Chamber of Progress, a tech industry association working to ensure all Americans benefit from technological leaps, I write in response to the Traffic Mobility Review Board's current deliberation of the proposed Central Business District (CBD) tolling program as it relates to congestion pricing plans for taxis and for hire vehicles (FHV).

New York City has continued to explore different approaches to reducing traffic congestion in our nation's most prominent business district while also seeking to address the environmental threat of air pollution. While traffic begins to rebound to over 90% of pre-pandemic levels, mass transit ridership has struggled to recover its pre-pandemic ridership.¹ Traffic congestion is detrimental to commuters, businesses and the overall health of residents.

We are strong proponents of ride and peer-to-peer car sharing because of its proven environmental and economic benefits. Both services ensure more efficient utilization of privately owned vehicles², offer sustainable transportation options for residents, and make New York a more equitable place to live.³ In addition, these services create another stream of income for New Yorkers.

While we support the goals of the congestion pricing program, we have concerns that the proposed implementation would disadvantage rideshare drivers relative to taxis, discriminate against outer borough residents, and have a negative impact on peer to peer car sharing programs that put private vehicles to more efficient use.

The initial proposal will disproportionately affect low-income and outer borough residents with less access to public transportation. The congestion surcharge treats Taxis and FHV's

¹Ana Ley, Why Drivers Could Soon Pay \$23 to Reach Manhattan, The New York Times, (Aug. 2022)
<https://www.nytimes.com/2022/08/18/nyregion/nyc-congestion-pricing-manhattan.html>

² David Morris, Today's Cars Are Parked 95% of the Time, (Mar. 2022),
<https://fortune.com/2016/03/13/cars-parked-95-percent-of-time/>

³ *To Move Is To Thrive: Public Transit and Economic Opportunity for People of Color.* (Nov. 2017)
<https://www.demos.org/research/move-thrive-public-transit-and-economic-opportunity-people-color>
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differently, limiting FHV's ability to serve residents from low-income neighborhoods who have historically been underserved by the MTA. In addition, FHV's and Taxi drivers could pay a toll anywhere between \$9 and \$23 during peak hours. If implemented, the toll pricing scheme will place an economic burden on New Yorkers traveling from underserved communities inbound to the city while residents of midtown and lower Manhattan traveling within the zone will see no additional fees, despite having ample access to transit.

Since 2019, FHV's and Taxis have been paying a congestion surcharge of \$2.50 and \$2.75 respectively on any trip that starts or ends within the designated zone of Manhattan-generating close to \$1 billion in revenue since implementation. The MTA reported that the current congestion surcharge is projected to generate \$393 million in revenue annually.⁴ Of that annual revenue, \$300 million a year would be allocated towards the Subway Action Plan and \$93 million would be returned to the MTA's general transportation account.⁵ Rather than double-taxing FHV drivers, the MTA should redirect a portion of the generated revenue towards the CBD tolling program.

We also ask the Board to craft rules that consider their potential negative impact on discouraging peer to peer car sharing. Earlier this year, the state of New York legalized peer to peer car sharing,⁶ recognizing the promise of peer to peer car companies in order to protect the environment, close transit gaps, and offer families the financial stability needed to recover post-pandemic.

While we support the commitment to curtail greenhouse gas emissions by reducing traffic congestion, we urge the Board to consider alternative models that balance transit and environmental priorities while refraining from adding additional financial strain on low-income communities.

Thank you for your consideration on this important matter.

Respectfully,



Jamie Pascal
Director of Civic Innovation Policy
Chamber of Progress

⁴ MTA Adopted 2022-2025 budget. Page II-8. <https://new.mta.info/document/65081>

⁵ Subway Action Plan Final After Action Report. January, 2020. <https://new.mta.info/document/13951>

⁶ Steve Bittenbender, New York becomes latest state to pass peer-to-peer car sharing law, (Jan. 2022) https://www.thecentersquare.com/new_york/new-york-becomes-latest-state-to-pass-peer-to-peer-car-sharing-law/article_c4715a58-6983-11ec-9542-c3241008a074.html