



THE CITY OF NEW YORK
OFFICE OF THE COMPTROLLER
BRAD LANDER

December 20, 2024

Chair and CEO Janno Lieber
Metropolitan Transportation Authority
2 Broadway
New York, NY 10004

Commissioner Ydanis Rodriguez
New York City Department of Transportation
55 Water Street, 9th floor
New York, NY 10041

Dear Chair Lieber and Commissioner Rodriguez,

Congestion pricing is set to go into effect on January 5, 2025, promising a series of traffic reduction, air quality, and transit ridership benefits in addition to critically needed revenue to make capital improvements and improve service for millions of transit riders. While we are thrilled the Governor and MTA have reached an agreement to put congestion pricing into effect, the program will only succeed if we help New Yorkers and visitors see and feel its direct benefits.

In advance of the implementation of congestion pricing, our office requests that MTA and NYC DOT commit to publishing data about the performance of the program using the indicators listed below to assess the traffic, environmental, and financial impacts of congestion pricing in a transparent and accessible manner.

Traffic Impacts

Modeling suggests that congestion pricing will reduce traffic volumes in New York City's central business district and shift trips to off-peak times, especially among freight vehicles. Cities with congestion pricing policies in place also experienced sizable improvements in traffic speeds, with London reporting a 37% increase in average speeds and 20% decline in traffic volumes following implementation.¹ Faster-flowing traffic is an especially critical need for emergency vehicles, as emergency response times have steadily worsened over time in the central business district.² Accordingly, we request DOT and MTA produce the following data to assess the impacts of congestion pricing on traffic speeds and patterns:

1. Average travel speeds at the following times/locations:
 - a. Peak times (5am to 9pm) in the central business district
 - b. Off-peak times in the central business district
 - c. Peak times (5am to 9pm) citywide
 - d. Off-peak times citywide

¹ Congestion pricing in London decreases inner city traffic by about 20 percent and generates more than £97 million each year for transit improvements: <https://www.itskrs.its.dot.gov/2007-b00333#:~:text=During%20the%20first%20few%20months,the%20expected%20shift%20in%20traffic.>

² Analysis of NYC Traffic Congestion and Emergency Response Times:
https://www.nysenate.gov/sites/default/files/admin/structure/media/manage/filefile/a/2024-09/speed-kills-report-9-20-24_final.pdf

2. The total number of each of the following types of vehicle entering the central business district during peak times (5am to 9pm) and off-peak times each day, starting on January 5, 2025:
 - a. Automobiles, including those with commercial license plates
 - b. Small trucks
 - c. Large trucks
 - d. Intercity and charter buses
 - e. Tour buses
 - f. Yellow taxis, green cabs, and black cars
 - g. For-hire vehicles
 - h. Specialized government vehicles
 - i. Motorcycles
3. The number of each type of vehicle listed above entering the central business district from the Lincoln, Holland, Queens-Midtown, and Hugh L. Carey tunnels.
4. The number of each type of vehicle listed above entering the central business district from the Brooklyn, Manhattan, Williamsburg, and Queensborough bridges.
5. The number of each type of vehicle listed above entering the central business district from each bridge and tunnel at peak and off-peak times on a comparable day prior to the implementation of congestion pricing.
6. The total number and average speed of emergency vehicles at the following times/locations:
 - a. Peak times (5am to 9pm) in the central business district
 - b. Off-peak times in the central business district
 - c. Peak times (5am to 9pm) citywide
 - d. Off-peak times citywide

Environmental and Health Benefits

Improving air quality, reducing asthma rates, and cutting greenhouse gas emissions are all explicit goals of congestion pricing. The environmental assessment MTA prepared for the program projects city- and region-wide improvements in all three areas. This aligns with the experiences of London and Stockholm, where reduced vehicle traffic resulted in double-digit decreases in air pollutants³ and cut childhood asthma hospitalizations in half.⁴ The environmental assessment also noted that air quality improvements may not be evenly distributed throughout the city and some neighborhoods in the Bronx may see slightly higher traffic volumes. The MTA has agreed to dedicate \$155 million towards mitigating potential negative impacts in these neighborhoods and should commit to closely monitoring localized environmental, health, and air quality indicators. Specific metrics include:

1. Air quality indicators, in the central business district and citywide:
 - a. Carbon monoxide (CO)
 - b. Ozone (O3)
 - c. PM10
 - d. PM2.5
 - e. Sulfur Dioxide (SO2)
2. Greenhouse gas emissions attributable to transportation
3. Weekly asthma hospitalization rates in the central business district, environmental justice communities, and citywide

³ TSTC, "A Way Forward": https://tstc.org/wp-content/uploads/2018/03/TSTC_A_Way_Forward_CPreport_1.4.18_medium.pdf

⁴ Washington Post, "Congestion pricing also clears the lungs, researchers say": <https://www.washingtonpost.com/news/tripping/wp/2018/03/27/congestion-pricing-clears-the-lungs-too-researchers-say/>

Financial and Revenue Impacts

The 2019 legislation authorizing congestion pricing stipulates that the program must bring in enough revenue to support \$15 billion in transit capital improvements. Financial transparency is essential to demonstrate that congestion pricing is meeting its legal obligations and build public trust in the program. To that end, we request that MTA disclose revenue raised from the following sources:

1. Cordon toll, weekdays
2. Cordon toll, weekends and holidays
3. Yellow taxis, green cabs, and black cars, weekdays
4. Yellow taxis, green cabs, and black cars, weekends and holidays
5. Ride-hail vehicles, weekdays
6. Ride-hail vehicles, weekends and holidays
7. The number of vehicles entering the central business district carrying missing, temporary, obscured, fraudulent, or otherwise unreadable license plates, and the resulting loss of revenue.

The Traffic Mobility Review Board also created multiple exemptions and discount programs for qualifying vehicles. We request that the MTA disclose the number of vehicles enrolled in each of the following exemption or discount categories:

1. Low-Income Discount Plan (LIDP)
2. Individual Disability Exemption Plan (IDEP)
3. Organizational Disability Exemption Plan (ODEP)

Capital Improvements

The law dedicates revenue from congestion pricing towards funding \$15 billion worth of transit capital projects, including accessibility improvements at 18 stations, modernized signals on multiple lines, and extending the Second Avenue Subway to West Harlem. These projects are essential to ensuring the MTA remains a world-class transit system and represent upgrades riders have been waiting years, if not decades, to see implemented. The MTA must publish real-time updates about the status of these projects, in order maintain public trust and confidence that congestion pricing is delivering the promised capital improvements. This reporting should take the form of a tracker that includes for each project funded through congestion pricing:

1. Location
2. Description, including its benefits to riders
3. Budget details including total cost
4. Current status
5. Anticipated completion date

Transit Benefits

In addition to raising revenue to fund transit capital improvements, congestion pricing has the potential to influence behavior and shift car trips to public transit. Improvements in traffic speeds could also translate into faster bus service and higher average bus speeds, which currently sit at a national low of 7.9 miles per hour.⁵ 39% of buses in the central business district run slower than 5 mph during peak times. MTA should

⁵ Streetsblog, "Citywide Bus Speeds Crash-Land To Pre-Pandemic Lows": <https://nyc.streetsblog.org/2024/06/25/citywide-bus-speeds-complete-successful-crash-landing-to-pre-pandemic-lows>

demonstrate the immediate-term value of congestion pricing to transit by publicly reporting the following metrics:

1. Transit ridership:
 - a. Daily total estimated subway ridership
 - b. Daily total estimated bus ridership
 - c. Daily total estimated Long Island Railroad (LIRR) ridership
 - d. Daily total estimated Metro North ridership
 - e. Daily total estimated Staten Island Railroad ridership
 - f. Daily ridership estimates as a percentage of ridership on an equivalent day prior to the implementation of congestion pricing
2. Bus speeds:
 - a. Average bus speeds in the central business district during peak times (5am to 9pm)
 - b. Average bus speeds in the central business district during off-peak times

We respectfully request a response by January 10, 2025 to confirm which of the above indicators will be made public and the frequency with which MTA and NYC DOT intend to publish updates. If MTA or NYC DOT do not maintain the information requested or already publish it publicly in the format described, please indicate so in your response. Please contact Sindhu Bharadwaj at sbharad@comptroller.nyc.gov with any follow-up questions.

Thank you in advance for your assistance.

Sincerely,



Brad Lander
New York City Comptroller

CC:

New York City Department of Environmental Protection
New York City Taxi and Limousine Commission