



BRONX BOROUGH PRESIDENT VANESSA L. GIBSON

June 12, 2023

Dear Richard J. Marquis, Allison L. C. de Cerreno, Nicholas A. Chourah, and Eric Beaton,

The draft Finding of No Significant Impact (FONSI) issued by the FHWA is a positive step towards the final implementation of the Central Business District Tolling Program (CBDTP), commonly known as congestion pricing. The implementation of the congestion pricing program would lead to meaningful reductions in traffic congestion, which would result in a significant reduction of particulate emissions into our city's air. This will be of great benefit to the people of New York City. However, as Bronx Borough President, I still have concerns that I believe remain unaddressed as part of the FONSI.

The environmental assessment and the FONSI recognize that the CBDTP would result in diversion of traffic from the CBD to peripheral routes, many of which pass through The Bronx. Most notably, the Cross Bronx Expressway would see an increase in traffic, particularly heavy truck traffic. According to the assessment, there could be as many as 700 additional trucks on the highway, depending on the tolling scenario. The MTA's report noted that this would result in a net increase in particulate emissions in The Bronx. Ever since the Cross Bronx Expressway was originally built, it has been an environmental injustice that has inflicted harm on our communities. The pollution spewed into the atmosphere by the vehicles that traverse this highway has resulted in elevated asthma rates in adjacent neighborhoods, particularly among children. This is unacceptable, and more must be done to mitigate these harms.

While I remain a strong advocate for finally capping the Cross Bronx Expressway, mitigation efforts must be a part of the congestion pricing rollout in the near term. It would be entirely unjust for The Bronx to bear increased pollution in an effort to reduce pollution citywide. The Bronx is already underserved and oversaturated by truck pollution, has the highest asthma rates in the state, and has taken on more than our fair-share of environmental injustices all for the 'greater good' of the city and region. While the FONSI does recognize the need for mitigatory measures surrounding the Cross Bronx, allowing three months to pass before requiring paltry mitigations such as "ramp metering, motorist information, [and] signage" is not an acceptable intervention. Additionally, while adding monitoring sites is always a good thing, that is not in and of itself a mitigation. The two-year wait after the tolling program goes into effect to see if the state will add more monitoring sites will accomplish little for the people who are being negatively affected by the increased traffic and pollution within our borough.

More direct mitigation must be done to prevent increased pollution from harming residents of adjacent neighborhoods. I stated in my previous testimony that with the capping of the Cross Bronx Expressway, public green space and a public transportation line could be created that would provide an east-west railway link stretching from Washington Heights to Parkchester, creating connections across eight subway lines, and serving nearly 600,000 people that live in adjacent neighborhoods. There have been proposals for the Interborough Express which would connect Brooklyn and Queens, and this transportation connection would have a similar impact. I understand the capital needed for the capping of the Cross Bronx Expressway cannot be directly taken from congestion pricing revenue, but the money generated will 'free up' other money the city and state can use. By improving health outcomes for an entire borough, the savings to the city would surpass the capital costs many times over.

The FONSI mentions the MTA's transition to an all-electric bus fleet will prioritize the Kingsbridge and Gun Hill depots for the rollout of these new buses. The transition to electric buses will have a positive effect on air pollution across the city, and prioritizing The Bronx and Upper Manhattan will bring those benefits to us sooner. However, this rollout was going to happen regardless of the CBDTP, so it seems tenuous and somewhat disingenuous to promote this as a mitigation measure to the truck traffic. While I do not believe it is a solution to the increased air pollution congestion pricing will bring, I am pleased this change is occurring and would like to continue working with the MTA to achieve this rollout as soon as possible.

Beyond the effects on air pollution in The Bronx, I am also concerned with the potential effects that the CBDTP will have on the taxi and for-hire vehicle (FHV) drivers of our city, many of whom live in The Bronx. Taxi and FHV rides are already subject to congestion fees, and further increasing the price of rides will likely cause the overall number of rides taken to decline, putting increased pressures on the drivers to make ends meet. In one of the proposed tolling scenarios, the assessment found that taxi and FHV rides could decline by nearly 17 percent. I was pleased to see that the final Environmental Assessment recognized that the CBDTP would have a "disproportionately high and adverse effect" on taxi and FHV drivers, and that there was required additional mitigation for these drivers. While the requirement that the final toll structure caps taxis and FHVs at one toll per day is a strong step towards mitigation, I remain concerned that the double congestion fees will prove to have a negative effect on drivers. As the program rolls out, I will be pushing the state and city to closely monitor taxi and FHV trips to ensure that the increased price will not cause an undue drop in the number of rides, threatening the livelihoods of our drivers.

The FONSI also mentions that place-based mitigations could be necessary in many Bronx neighborhoods. They mention in particular: Highbridge, Morrisania, Crotona, Tremont, Hunts Point, Mott Haven, Pelham, Throgs Neck, and the Northeast Bronx, just in our borough. The fact that these affected neighborhoods make up a large proportion of the borough's area and population should underscore the harms that the tolling program could have on The Bronx without proper mitigation. The proposed mitigation efforts must all take place for the tolling program to be worthwhile for The Bronx. The ones mentioned in the FONSI include replacing diesel-burning trucks at Hunts Point, expanding electric charging infrastructure, installing more roadside vegetation, renovating parks, installing air filtration units in schools, and providing more asthma case management programs and creating a neighborhood asthma center in The Bronx. These efforts will all make a difference, but they must be the start and not the end of the efforts to improve air quality in The Bronx.

While I have the concerns mentioned above, I still believe that the CBDTP will prove to be positive for our city. However, it must be enacted in a way that does not inflict further harm on people who have already borne disproportionate injustices. Making progress for our city cannot come at the expense of The Bronx and the people who live and work here. There must be real mitigation of these environmental harms, and there must be significant investment in ameliorating the serious negative conditions that already exist and will be exacerbated by this program. Thank you for your attention to these important issues.

Sincerely,

A handwritten signature in black ink that reads "Vanessa L. Gibson". The signature is written in a cursive, flowing style.

Vanessa L. Gibson
Bronx Borough President