

## **Congestion Pricing - NYC**

2020

Congestion in the New York City region costs the trucking industry \$4.6 billion annually. Addressing the congestion issue is a priority concern of the industry. However, a Congestion Tolling Program is not the solution.

**TANY Position:** The Trucking Association of New York believes that the Congestion Tolling Program should exempt commercial vehicles due to their economic importance to New York City. Additionally, trucks represent only 8% of all vehicles operating in the proposed congestion zone and are not a primary cause of congestion.

<u>Trucks are critical to the economy of New York City</u>. Trucks deliver pharmaceuticals and medical equipment to hospitals, food and beverages to restaurants, linens and supplies to hotels, fuel to homes and businesses, building materials to construction sites, online orders to personal residences and more. Currently, 91% of all goods coming into or out of New York City are carried by truck. Ultimately, it will not be the trucking industry that is hurt by a congestion toll. As motor carriers renegotiate contracts, they will need to build the congestion toll into their freight rates, raising the cost to their customers in the congestion zone. This will put those businesses within the zone at a competitive disadvantage to those businesses that are outside the zone.

<u>Truck travel is non-discretionary</u>. Trucking companies do not control when they make deliveries, their customers do. They have no choice but to enter the commercial business district at the time that their customer requests. Charging a congestion toll does not cause a truck driver to shift delivery times, as it is not within their control. Trucks are there when they <u>have</u> to be, not when they <u>want</u> to be.

Given the choice, truck drivers would prefer to make deliveries during off-peak hours when traffic is lighter. Unfortunately, they cannot make deliveries to businesses that are closed. Charging a fee to enter a congestion zone, or higher fees during peak hours, will simply not change the behavior of the driver. In fact, during the summer of 2017, in an effort to reduce truck travel during peak hours, the Metropolitan Transportation Authority (MTA) conducted a pilot program providing reduced commercial vehicle tolls during off-peak periods. Following the conclusion of the pilot MTA found that there was almost no difference in vehicle crossing times — the reason is because trucks enter New York City when they have to, not when they want to.

Congestion Pricing provides no benefit to the trucking industry. The congestion tolling program assumes a recurring stream of revenue to be generated from congestion tolls. If the program was truly designed to reduce congestion, it would assume a declining source of revenue. The trucking industry holds that there will be no measurable reduction in congestion resulting from a congestion tolling program and that this is simply a means to raise revenue for transit. Currently, there is no discussion regarding allocating a portion of revenue to improve roads and bridges, which would provide a benefit to the trucking industry. Absent a measurable reduction in congestion or investment in roads and bridges, this program provides no benefit to the trucking industry. The industry should not be expected to pay for transit investment if there is not going to be equal infrastructure investment.

<u>TANY supports expansion of the off-peak delivery program.</u> If a goal of congestion pricing is to shift trucks from peak travel periods, then businesses should be incentivized to take deliveries during off-peak hours. Changing the behavior of the receivers will reduce the number of deliveries during peak hours, as well as reduce costs to both trucking companies and their customers.