



# Regional Plan Association

... a research and planning agency supported by voluntary membership to promote the coordinated development of the New York-New Jersey-Connecticut Metropolitan Region.

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## NEWS RELEASE

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REGIONAL PLAN ASSOCIATION SUPPORTS NEW YORK AIR QUALITY IMPROVEMENT PROGRAM  
BUT WARNS AGAINST SIDE EFFECTS THAT COULD AFFECT POOR, PUBLIC TRANSPORTATION

Attached is the statement of Jeffrey Zupan, Chief Systems Analyst for Regional Plan Association, testifying at the hearings for New York Metropolitan Area Air Quality Implementation Plan.

Speaking on behalf of the Association, Mr. Zupan supported many of the proposals but made the following major points:

1. Care should be exercised in the implementation program to not place the poor at a disadvantage. Many low-income workers must use an automobile for the trip to work and high costs of passenger car retrofit and maintenance of control devices may leave them without the means to get to available jobs at the periphery of the City in areas not served by public transportation--and not suffering from auto congestion and severe pollution.

2. Proposals should be carefully examined for possible negative side-effects. A four-day work week could cause a serious drop in public transportation passenger loads and revenue requiring additional subsidy. Staggered work hours could encourage more automobile commuting, further weakening public transportation. Additional exclusive bus lanes in New York City should be viewed cautiously where they might divert excessive revenue from subway systems, thereby requiring additional subsidies.

3. Traffic to the CBD should be discouraged by closing off selected entries, such as the Central Park roads, limiting parking space, and reducing vehicle circulation space by enlarging pedestrian areas. Limited-access highways that would take traffic around the CBD and not through it would result in improved air quality in the CBD.

Regional Plan Association's full statement is attached.



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STATEMENT OF REGIONAL PLAN ASSOCIATION AT PUBLIC HEARING

HELD BY

NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION

ON NEW YORK METROPOLITAN AREA

AIR QUALITY IMPLEMENTATION PLAN

TRANSPORTATION CONTROLS

APRIL 9, 1973

My name is Jeffrey M. Zupan, Chief Systems Analyst of Regional Plan Association. Regional Plan is speaking here today because of our close involvement with transportation planning in the New York Urban Region.

In 1966 we published Transportation and the Manhattan Central Business District-A Regional Association Policy Statement. This document makes recommendations to improve travel and circulation into and through the CBD.

In May 1971, we issued a draft summary of our soon-to-be published book Pedestrian Space, which outlines how to achieve additional space for pedestrians and reduce vehicle travel in Mid-Manhattan.

In January of this year, we published Transportation and Economic Opportunity, a report to the Transportation Administration of New York City which describes the transportation steps that can be taken to improve job access for low income workers in New York City.

In the past year we have completed research sponsored by Resources for the Future (RFF) under the title of The Distribution of Air Quality in the New York Region. This work will describe the exposure by income to varying levels of air quality, both in the past and projected for the future.

The Air Quality Implementation Plan of your department under consideration spells out many of the choices the City faces to achieve Federally-mandated ambient air quality standards. The Implementation Plan contains a realistic appraisal of the costs and benefits of numerous transportation strategies to the extent that current knowledge allows. The Implementation Plan is aware that the goal of clean air is often in conflict with other objectives of society and of individuals and that such conflicts must be addressed. Regional Plan Association has always tried to balance such objectives regionally; we comment on the Implementation Plan in that perspective.

The major way to meet the air quality standards of the Clean Air Act is to have clean cars. Clean cars can be achieved two ways 1) by meeting the Federally mandated motor vehicle emission standards for 1976 which will produce gradually cleaner air over the ten year period to 1985 (provided the vehicles are adequately inspected). The problem with this approach is that it will not provide clean air by 1975, the presently mandated date. 2) By the retrofit of passenger cars at a cost of \$175 plus \$25 annually which amounts to \$1 billion in initial capital costs and \$175 million annually for maintenance in a 19-county area. While this proposal could achieve clean air by 1975 it represents a regressive step, placing an unfair burden on the low and middle income auto owner, particularly those who have little alternative but the automobile to get to jobs on the periphery of the City or beyond. Those who can afford the retrofit will pay it; those that cannot may be left with no means to get to work. As we have shown in Transportation and Economic Opportunity, the low income worker is surprisingly dependent on the automobile in his work journey. Accordingly, we cannot support the retrofit of passenger cars as presently proposed.

Some of the transportation-controls strategies proposed by the Implementation Plan may not be necessary in the 1976-1985 period if motor vehicle standards are met and maintained, although many involving traffic control, public transit and long-range land use planning should be carried out not necessarily because of their impact on air quality (some would have little such impact), but because they would have other positive results. Other strategies in the Plan, however, whether they improve the quality of the air or not, may have negative impacts that cannot be ignored. Our comments here are designed to call attention to both these positive and negative features of these long discussed proposals.

Our specific comments on these strategies of the Implementation Plan follow.

#### Traffic Control Policies

1. Regional Plan supports stricter traffic and parking enforcement proposed by the Implementation Plan. We note, however, that past campaigns to limit illegal on-street parking through enforcement have been hampered by special group dispensations, which are more liberal in New York City than in many other cities. We see no reason why many of these special permits should be continued.

2. The limitation on the number of off-street parking spaces has long been supported by Regional Plan. In 1966, Transportation and the Manhattan Central Business District opposed investment in "additional public parking facilities in the central business district." In an unpublished Regional Plan memorandum, A Note on the Contribution of Off-Street Parking Facilities to Vehicular Traffic in Manhattan, it was estimated that about one-third of all vehicles entering or leaving the Manhattan CBD are going to or leaving from off-street parking facilities. Restriction on new

parking facilities to reduce vehicles entering the CBD is certainly justified.

3. The prohibition of taxicab cruising should at least be tried on a demonstration basis first. Our study, Pedestrian Space, indicates that the taxicab is the least efficient mover of people in Mid-Manhattan. On average, for every vehicle mile travelled, less than one person-mile is transported in taxicab, because of cruising with no passengers. While taxi cruising is an obvious target for cleaner air, taxis still may prove to be the most effective method of meeting a special travel demand.

4. Establishment of "limited access" streets that would restrict certain types of vehicles to selected streets has many problems, several alluded to in the Implementation Plan. However, limited-access highways that carry traffic around or under the CBD and not through it are likely to improve air quality in the CBD. Our position in favor of the Cross-Brooklyn and Lower Manhattan Expressways and possibly a Midtown Underpass recommended in the recent privately-financial Manhattan Auto Study is consistent with that concept.

5. The Implementation Plan strategy of putting tolls on the presently free East River Bridges is supported by Regional Plan Association because the traffic on them feeds directly to the Manhattan CBD. This recommendation is subject to side effects at toll plazas. The Implementation Plan has correctly noted that the implementation of tolls or their increase where they presently exist, unless of substantial magnitude, is unlikely to reduce vehicle traffic. If higher tolls are instituted, the money raised should be used to improve mass transit.

6. However, as the newest version of the Implementation Plan suggests, the proposed tolls on the Harlem River Bridges will be an unnecessary burden on the many low income people travelling between upper Manhattan, Harlem, East Harlem and the Bronx who often make trips to places not served

well by public transportation at all times. Besides, these facilities do not feed traffic directly into the Manhattan CBD as the East River facilities do.

7. A more effective way of curtailing traffic entering the Manhattan CBD from the north is to close Central Park entrances to the CBD, as suggested in Regional Plan's report Pedestrian Space.

8. As described in Regional Plan's report, Transportation and Economic Opportunity, an increase in motor vehicle charges that fall disproportionately on low income people not travelling to high density areas, will be an unnecessary burden. Regional Plan therefore does not support the imposition of flat motor vehicle fees because they place the financial burden on all vehicle owners, regardless of ability to pay. This does not imply that a sliding scale of fees by income or selected user charges in high traffic density areas such as parking surcharges are not desirable.

9. Sidewalk widenings and street closings on selected streets in the Manhattan CBD were cornerstones of the Pedestrian Space recommendations. The reduction in roadway space available to motor vehicles, particularly passenger cars and taxicabs will eventually reduce the number of vehicles in the CBD. Just as we induce traffic when additional vehicle roadway space is provided, we can reduce traffic by removing vehicle roadway space. Regional Plan urges the City of New York to move ahead with its too-long delayed plan to convert Madison Avenue into a pedestrian mall, which will reduce motor vehicle traffic, create much-needed amenity in Mid-Manhattan, and provide walking space to the harried pedestrian. New York City should follow the experience of cities and towns throughout the world where malls have achieved commercial success and civic pride.

10. As suggested in Pedestrian Space and supported by the Implementation Plan, creation of auto-free pedestrian zones is ultimately possible.

Public Transit Improvement Policies

1. Regional Plan supports the generalized concept of staggered work hours. Because some highway capacity is available just before and just after the peak periods, staggered hours might induce added travel to the CBD by car. This would add to the problem of air pollution and further weaken public transportation. Staggered hours programs must be monitored so this can be prevented, and transit schedules must be adjusted so service remains frequent throughout the elongated journey to work period.
2. The proposal in the Implementation Plan for staggered work days embodies great dangers for public transit. Just as the stepdown from the six-day work week lowered the revenues of public transit, a four-day work week also could reduce ridership and revenue by as much as 20 percent.
3. Regional Plan supports the Implementation Plan with regard to easier transit connections to attract more transit ridership. We have long argued for more convenient and attractive transfer connections between existing and new public transit services. In 1966, we suggested the Bryant Park connection of the Sixth Avenue IND with the Flushing IRT, which has been successfully accomplished, and a connection of the IND and IRT services at Lexington Avenue between 51st and 53rd Streets, which has yet to be realized. We have long worked for a direct transfer that is going to be built between the Long Island Railroad and the new Southeast Queens subway line in Jamaica Center. On the new Second Avenue line we have recommended direct transfers to the existing lines at 53rd Street and 42nd Street which would make this new line much more useful. Improvements easing transfer difficulties cannot be stressed enough.
4. In Transportation and Economic Opportunity, specific bus route adjustments and the elimination of selected double bus fares are suggested that would create more direct and less expensive bus service for low

income area residents. Both would fulfill the Implementation Plan's aim of attracting more transit ridership. Further fare reductions are possible but the ultimate step to a free transit system poses some hard questions. Two are posed here. Might the money raised to support transit be better used for the obviously desirable strategy of rehabilitating the system? Might the additional usage of the transit system that a free transit policy could attract further raise the costs of running the system by inducing unnecessary travel?

5. The creation of exclusive bus lanes suggested by the Implementation Plan should be examined more closely. While at first glance it has much appeal, many difficulties may result. To create sufficient volumes of bus travellers to warrant exclusive lanes for buses would require a very large diversion of travellers from the subway system. Present evidence suggests that current users of improved bus service are former users of other public transportation, not automobile drivers. Thus, exclusive bus lanes would tend to sap the revenue of existing public transportation and not remove sizable numbers of vehicles from the road. A further disadvantage is the addition of large volumes of buses on the streets of the CBD and the requirement for new bus terminal facilities. Neither of these prospects is environmentally appealing.

#### Long Range Planning

The issue of land use policy and development controls is raised by the Implementation Plan. It is suggested that planned new developments in the Manhattan CBD, such as the Convention Center, Battery Park City and Manhattan Landing, will result in large increases in traffic that would make it impossible to meet air quality standards. Our calculations suggest

otherwise. In our report, The Distribution of Air Quality in the New York Region, it is estimated that with the motor vehicle emission standards for 1976 met and maintained, it is possible by 1985 to have substantial increases in activities in the CBD and its related vehicle traffic and still meet Federally-mandated air quality standards. This is not to say that the CBD has the space to accommodate such auto traffic increases or that such space be provided; increased floorspace in Manhattan can be and should be served primarily by public transit.

The growth of the Manhattan CBD is based on strong economic and social grounds. The necessary interaction in the Manhattan CBD did not happen because of chance and represents the Region's major economic asset.

Regional Plan believes that it is possible for the Manhattan CBD to grow in an orderly fashion even if new vehicle capacity is not provided into the CBD and parking capacities are limited. The Manhattan CBD can be concentrated without congestion. A high density urban environment is an energy-conserving and travel-conserving environment, and building more high-density areas in lieu of spread development is a way to conserve open space.

We believe that the Implementation Plan has given insufficient emphasis to the crucial relationship between density and public transportation. Our research has shown that those living and working at higher densities make fewer and shorter trips by automobile than those living at lower densities. Only with substantial concentration of activities, both residential and non-residential, can public transportation work well. This recommendation for greater density in selected sub-centers is the heart of the Second Regional Plan. The pattern of revitalized sub-centers which is happening in Downtown Brooklyn, Jamaica Center, White Plains and elsewhere, should be fostered by State and City Actions.