



# 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 CALLS AMENDED NEW YORK CITY AIR QUALITY CONTROL PLAN INADEQUATE

Attached is Regional Plan Association's statement on the proposed air quality implementation program for the New York Metropolitan area. It will be presented by Jeffrey Zupan, Chief Systems Analyst, at the hearing of October 31 before the New York State Department of Environmental Conservation. Mr. Zupan is scheduled to testify at 9:30 p.m.

Regional Plan Association calls the amended plan inadequate for the following reasons:

- It relies on an express bus system that will not work unless it is unwisely designed to compete directly with the subway.
- It relies on vague promises of stricter enforcement of on-street parking, promises made and unfulfilled for years.
- It relies on zoning changes for off-street parking which will take effect only over a long number of years.

--It relies on strategies that are unlikely to curtail auto travel, such as car pools, staggered hours and fringe parking.

--It omits such promising strategies as tolls on East River bridges and a selective ban on taxi cruising.

--It ignores such obvious strategies as selective street closings and sidewalk widenings.

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STATEMENT OF REGIONAL PLAN ASSOCIATION AT PUBLIC HEARING  
HELD BY  
NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION  
ON NEW YORK CITY METROPOLITAN AREA  
AIR QUALITY IMPLEMENTATION PLAN  
TRANSPORTATION CONTROLS  
OCTOBER 31, 1974

My name is Jeffrey M. Zupan, Chief Systems Analyst of Regional Plan Association. Regional Plan is appearing here today because of our close involvement with transportation planning in the New York Urban Region, particularly in matters related to the Manhattan Central Business District (CBD).

During the last several years, the Association has completed studies on such matters as public transportation, automobile travel, air quality, transportation energy demand, and pedestrian circulation. I call your attention to our testimony of April 1973 enumerating them.

When we testified on the earlier version of the Air Quality Implementation Plan, we emphasized that the gradual introduction of cleaner cars would be a major means for achieving the Federally-mandated ambient air quality standards. Unfortunately, developments have made it apparent that heavy reliance on such a strategy will not work. The motor vehicles air pollution control devices introduced since then have not been effective in reducing carbon monoxide concentrations and the Federally-mandated emission standards have been pushed back. These developments make necessary transportation control strategies that truly control the use of the automobile in Manhattan's Central Business District.

The amended plan before us today differs from the earlier version by omitting such key strategies as tolls on East River bridges and a selective ban on taxi cruising, both of which Regional Plan still supports. The key provision added is one of greater reliance on express bus service.

The basic means to improve air quality in the CBD is to reduce the amount of vehicular travel that occurs there. To accomplish this, it is necessary to reduce the space available for vehicles to enter the CBD, move around within the CBD, and park in the CBD. This Air Quality Implementation Plan partially recognizes this by emphasizing the need for parking reductions and the substitution of buses in the space now used by automobiles. We heartily endorse the intent of these two strategies, but seriously question their workability.

The use of one-third the capacity of north-south avenues for express buses cannot work. Even if every person in an automobile on the usurped lanes was diverted to buses during the peak three hours, the exclusive bus lanes would handle an average of only one bus every 90 seconds! It would be a Herculean task to enforce bus lanes for buses only under such circumstances. And if not enforced, there would be no incentive not to drive. Of course, on arteries farther from the core, the frequency of buses would be still lower. Only if the intent were to compete directly with the subway system could these buses hope to have sufficient frequency to be self-enforcing. Such a strategy would be disastrous to the subway system's finances, forcing the fare or required subsidy still higher. In the continued absence of any permanent means of financing public transportation, such a policy would be self-defeating.

As Regional Plan has stated many times before, a far more effective means of removing the capacity for automobile traffic into the CBD would be to close streets selectively and widen sidewalks, turning over the vehicular space to pedestrians and bicyclists. We are convinced that nonessential, marginal vehicle traffic would be discouraged by such a policy and that essential services and trips that require vehicular use would not be affected. Closing the Central Park Drives permanently to vehicles would be the place to initiate such a policy.

The reduction of off-street parking policies through changes in zoning regulations is certainly a step in the right direction, but such regulations will be slow in taking effect. Also, the construction of huge parking garages in the Manhattan CBD to satisfy special interests must be avoided.

With respect to the proposed parking strategy, vague assurances of "increased enforcement capability" and reduction of "privileges to certain vehicles" to reduce on-street parking experience indicates, are insufficient to insure reductions of motor vehicle use. Incentives not to park illegally such as the towaway program are good, but insufficient. The practicality of the removal of license plates, to be redeemed at the local police precinct, should be seriously examined as a more efficient procedure than towing.

Numerous proposed strategies in the Plan would have little or no effect on improving air quality and may reduce the use of the public transit system. This may very well be the case for the encouragement of car pooling to the CBD. Staggered work hours may also induce travel by automobile unless care is taken to adjust transit service to the longer peak. Likewise, the implementation of fringe parking facilities must be carefully thought through to prevent induced vehicle miles of travel and reduced public transit use.

Regional Plan Association is disappointed by the omission of a "land use policies" strategy in this amended plan. It is important to recognize the positive influences that high concentrations of activity have on the environment.

In sum, the amended plan is inadequate for the following reasons:

1. It relies on an express bus system that will not work unless it is unwisely designed to compete directly with the subway.
2. It relies on vague promises of stricter enforcement of on-street parking.
3. It relies on zoning changes of off-street parking which will take effect only over a long number of years.
4. It relies on strategies that are unlikely to curtail vehicle travel, such as car pools, staggered hours and fringe parking.
5. It omits such promising strategies as tolls on

East River bridges and a selective ban on taxi cruising.

6. It ignores such obvious strategies as selective street closings and sidewalk widenings.

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.