

**OFFICE OF THE COUNTY EXECUTIVE**

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**Edwin J. Day**  
*Rockland County Executive*

December 5, 2023

Honorable Members of the MTA Board  
2 Broadway  
New York, NY 10004-2207

Commissioners:

I write today to urge you to vote no to advancing the Traffic Mobility Review Board's (TMRB's) Congestion Pricing Toll Structure Recommendations. The TMRB Recommendation Report is flawed because it did not analyze the impact of credits for any of the tolled bridge crossings, as was required in the State legislation that governs the congestion pricing program.

The MTA Reform and Traffic Mobility Review Act requires that the TMRB recommend a plan for credits, discounts, and/or exemptions for tolls paid on bridges and crossings which shall be informed by a traffic study associated with the impact of any such credits, discounts and/or exemptions on the recommended toll. The TMRB never analyzed toll credits for any of the three tolled bridge crossings into Manhattan (Henry Hudson, RFK and George Washington bridges). In fact, it appears that any credit for bridge tolls into Manhattan had already been eliminated from consideration before the TMRB ever met. The TMRB Report's assertion that, "*The (crossing) credit should not apply to those vehicles driven to the zone indirectly via other tolled crossings, as it would be difficult to administer and would significantly add to the cost of the base CBD toll rates for everyone*" falls rather short on actual evidence or analysis.

The MTA Board should not vote to begin the rate making process or present a proposed toll schedule for public review until the legally-required analysis of credits for the tolled bridges into Manhattan is completed.

You may recall that your colleagues at the Regional Plan Association (RPA) had indicated in their recommendation that the best policy to ensure equity and reduce toll shopping would be crediting all drivers entering Manhattan for tolls paid if they continue into the congestion zone.

I also respectfully request that the MTA (and TBTA) Board consider an exemption from the CBD toll for Rockland County residents. Please be assured that Rockland County is not asking for more than its fair share with this very sincere request. Rockland County residents are the least served members of the MTA, as evidenced by the well-documented value gap each year between what Rockland pays to the MTA and what it receives in return. Good business leaders like yourselves know the importance of the Benefit-Cost Ratio (BCR) of an investment - the profitability indicator used to determine the viability of cash flow from a project. Rockland County's ratio of benefits to costs (BCR) associated with payments to the MTA versus

service/funding received from the MTA has ranged between 35% and 62% over the past 25 years. In business, anything less than 100% BCR means the project's costs outweigh the benefits and should not even be considered.

None of you would invest in a venture with that kind of return, yet Rockland County is forced to, year after year. Taxation without representation, if you will - especially with the quarter vote we have on this Board. No other member of the MTA has a Benefit-Cost Ratio less than 100%.

Based on Rockland County's well-documented, decades-long, annual \$40+ million value gap between what we pay to the MTA and what we receive in return, and the fact that MTA has no planned capital investments that will improve or expand transit availability from Rockland County, I am asking that you sincerely consider a full exemption from the CBD (congestion pricing) toll for Rockland County residents. Even with a full exemption, Rockland County's value gap will still remain significant. And exempting the very small number of Rockland County drivers to the CBD (less than 4,000) will not impact the base CBD toll rate for everyone else.

As you may know, MTA's 2020-2024 Capital Plan, by statute, required that funds be set aside for investments in expanding transit availability to areas in the outer boroughs and suburbs that have limited mass transit options (subject to the Memorandum of Understanding entered into by the Secretary of the Senate Finance Committee, the Secretary of the Assembly Committee on Ways and Means, and the Director of the Budget). There is nothing in MTA's current Capital Plan that indicates any investment will be made to expand transit availability from Rockland County. There has been nothing in any recent previous capital plan, and there is nothing in the MTA's 20-year Needs Assessment that indicates this type of investment will be made (replacement locomotives - while appreciated - will not expand service). The last significant investment MTA made in Rockland County was the purchase of new rail cars for West of Hudson. Those went into service 21 years ago in 2002. Rockland residents deserve an explanation for why no funding has been set aside to expand transit availability from Rockland County in conjunction with the MTA's Congestion Pricing program.

Rockland County will receive no direct benefit from the billions of dollars the CBDTP toll will collect. The MTA's CBDTP credit/discount analysis process to date has been blatantly exclusionary of the West of Hudson suburban members of the MTA, who already pay hundreds of millions of dollars each year to the MTA for the worst quality and least amount of transit service. Rockland County's overpayments to the MTA for the past 35 years have subsidized MTA long enough.

Thank you for your consideration of a CBD toll exemption for Rockland County residents.

Sincerely,

A handwritten signature in blue ink, appearing to read "Edwin J. Day".

Edwin J. Day  
Rockland County Executive