



**Testimony of FPWA**

**Presented to:  
Metropolitan Transit Authority  
Hearing on Congestion Pricing  
March 1, 2024**

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We are grateful to the Metropolitan Transit Authority (MTA) Bridges and Tunnels for holding a series of hearings on the proposed Central Business District (CBD) Tolling Program and for the opportunity to provide written comments on behalf of FPWA (Federation of Protestant Welfare Agencies) regarding the proposal.

FPWA is an anti-poverty policy and advocacy organization committed to advancing economic opportunity, justice, and upward mobility for New Yorkers with low incomes. Since 1922, FPWA has driven groundbreaking policy reforms to better serve those in need. We work to dismantle the systemic barriers that impede economic security and well-being, and we strengthen the capacity of human services agencies and faith organizations so New Yorkers with lower incomes can thrive and live with dignity.

New York City is one of the most densely populated cities in the United States.<sup>1</sup> This has contributed to the city's rich culture and character, but also presents unique challenges related to transportation, the environment, and public health. We commend the MTA Bridges and Tunnels for working on these issues and seeking to lead with a first in the nation proposal for tolling traffic congestion based on recommendations from the Traffic Mobility Review Board (TMRB) and public input. Notwithstanding, there are potential unintended consequences of the plan for low-income and middle-income commuters to and from lower Manhattan.

The stated goals for the CBD Tolling Program are to reduce the number of vehicles entering the CBD, address climate change, improve public health, and boost the economy. The program is also expected to improve commute times.<sup>2</sup> In their recommendations the TMRB noted that the CBD Tolling Program must balance the potentially competing aims of generating capital projects for transit and commuter rail improvements, incentivizing those who can use public transportation to do so, and setting tolls at affordable rates for those who must drive.<sup>3</sup> To that end, we appreciate that the MTA Bridges and Tunnels has announced the creation of a Low-Income Discount Program for drivers whose Federal adjusted gross income is under \$50,000, and a New York State tax credit for residents of the CBD whose State adjusted gross income is under \$60,000. We look forward to hearing the details of the discount program and tax credit and feel it is important to announce them prior to implementation of the CBD Tolling Program. These details are essential for individuals and families to make sound financial decisions.

The CBD Tolling Program would apply to the Manhattan Central Business District, (Manhattan south of and including 60th Street, but exclude FDR Drive, the West Side Highway, and the Hugh L. Carey Tunnel connection to West Street). This tolling will be assessed once per day when a vehicle enters the CBD, and the toll prices differ based on whether a vehicle entered during weekday, weekend, daytime or overnight hours, the vehicle type, and whether the driver entered with or without an EZ pass. During

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<sup>1</sup> <https://www.census.gov/popclock/embed.php?component=density>

<sup>2</sup> <https://new.mta.info/project/CBDTP>

<sup>3</sup> <https://new.mta.info/document/127761>

daytime hours, on a weekday with an EZ pass tolling prices can vary from \$15 to \$36 to enter the CBD.<sup>4</sup> That can add up to \$75 to \$180 per week based on a 5-day workweek. The CBD Tolling Program seems to operate under the presumption that this is affordable without showing the basis for that assessment. Based on the results of the NYC Racial Justice ballot initiative, New York City is adopting a true-cost-of-living measure. Any assessment of the potential economic impact of the CBD Tolling Programs should be assessed through a true-cost-of-living paradigm.

Incentivizing individuals to use public transit and investing in improvements will likely positively impact user experience and environmental harm. We must note that the rising cost of public transportation is burdensome on many New Yorkers. For those who continue to utilize vehicles due to their work or accessibility needs, or any other reason that prevents them from switching to public transportation, it is important to understand the impact on their economic stability. We share the MTA Bridges and Tunnel's desire to mitigate potential negative economic impacts of the CBD Tolling Program. We believe a comprehensive study of the impact on low-income and middle-income New Yorkers who may not be able to utilize public transportation and must regularly enter or reside in the CBD may be necessary to assess potential economic harms.

There have been studies of congestion pricing, including one by Community Service Society (CSS) in 2017, that assess the impact of congestion pricing on low-income commuters. The CSS study found that only 4% of outer borough residents use vehicles to get to work, and of those outer borough residents who use vehicles 4% were described as poor, 12% near poor, and another 28% had moderate income.<sup>5</sup> An accurate true-cost-of-living assessment will project the impact on families and determine how individuals not traditionally considered low-income will be impacted by the CBD Tolling Program. Additionally, there does not seem to be studies of the impact of the congestion tolling that considers commuters who drive into lower-Manhattan from outside of New York City, such as Westchester, the Hudson Valley, Long Island, Connecticut, and New Jersey.

While we know that Stockholm, London, and Singapore have implemented congestion pricing programs to varying success, we should acknowledge that none of those programs charge fees at all times of day. While we recognize that the CBD Tolling Program fee schedule does have lower fees for overnight and weekend hours compared to weekday and daytime hours, we believe New York City should be cautious about being an outlier in this way.<sup>6</sup>

Thank you for your time and your attention to these critical issues. FPWA looks forward to working with you to ensure that NYC's congestion pricing can be implemented in a manner that considers the economic impacts on low-income and middle-income New Yorkers and mitigates any unintended harm.

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<sup>4</sup> <https://new.mta.info/document/129191>

<sup>5</sup> [https://smhttp-ssl-58547.nexcesscdn.net/nycss/images/uploads/pubs/Congestion\\_Pricing\\_-\\_CSS\\_Analysis\\_V42.pdf](https://smhttp-ssl-58547.nexcesscdn.net/nycss/images/uploads/pubs/Congestion_Pricing_-_CSS_Analysis_V42.pdf)

<sup>6</sup> <https://gothamist.com/news/3-global-cities-have-had-congestion-pricing-for-decades-hows-it-going>