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September 22, 2022

As the Tenants Association of Stuyvesant Town and Peter Cooper Village, an 80-acre, historically middle-income housing complex in Manhattan, we represent 30,000 residents. All of us, by happenstance, not by choice, will be living within “the zone” when the congestion pricing plan goes into effect.

Our 30,000 constituents are of all ages, physical abilities and disabilities, states of health, political views, economic situations, those who own cars, and those who do not. Regardless, we will all be negatively impacted by the congestion surcharges you are proposing, be they the \$9 or \$23 being bandied about, and we require exemptions for simply living in the zone. London keeps being held up as a shining example of how effective congestion pricing can be, but that program is more nuanced and has many exemptions, such as car owners who happen to live in the London zone receive a 90% discount on congestion fees.

On behalf of our constituents, who all live between 14th and 23rd Streets, from First Avenue to Avenue C, we feel compelled to make the following points:

1. Manhattanites already tend to pay more for things related to daily living, such as rent, groceries, restaurants, etc. Dividing the borough into “within the zone” and “outside the zone” arbitrarily increases the cost of living to those in the zone, or limits their activities, such as taking children to school or elderly parents to doctor’s appointments, while those in Manhattan outside the zone are able to go about their daily life at no additional cost. This is an arbitrary “taxation” and cost-of-living increase on people who just happen to live below 60th Street.
2. Car owners in the zone already pay handsomely: huge registration fees, parking costs, parking tax, and crazy gas prices. Congestion pricing for residents who happen to live in the zone is an inequitable tax.
3. Congestion pricing is punitive in nature, penalizing those who are unable to use public transportation: those with disabilities or medical conditions, as well as those with concerns for personal safety at early or late hours, such as women, children, seniors on fixed incomes, essential workers with non-daylight hour shifts.
4. Taxis already carry onerous surcharges—and they are about to carry another to fund vehicles capable of transporting wheelchairs, often making them financially out of reach for those who may need them most.
5. The charges are regressive. Even the lowest proposed charges are exorbitant.

6. The city has failed to provide adequate alternatives: sufficient and reliable bus and subway service, sufficient and reliable Access-A-Ride.
7. The MTA plans to raise fares at the same time.
8. Qualifying vehicles transporting people with disabilities won't be charged: such vehicles could be yellow taxis since not every disabled person owns a car. How will this be administered?
9. Many residents use their cars to get to places where public transit isn't a safe or available option or to grocery/retail megastores outside the zone where prices are far lower.
10. Truck traffic on First Avenue will not be reduced because merchants can't control when deliveries are made. This was discovered when changes were being planned to the 23rd Street crosstown bus. Also, merchants can't staff around the clock in order to receive deliveries in the middle of the night.
11. Costs to trucks delivering goods within the zone will raise prices on food and other essentials as inflation increases and incomes stagnate or even still decrease, due to COVID.
12. The proposed income limit of \$60,000 to qualify for state tax credit is too low. Also, the tolls collected would be refunded as a tax credit—months after the tolls were paid. The government will collect and use taxpayers' money even as many struggle to balance their household budgets.
13. None of the largely real estate and business-aligned six members of the Traffic Mobility Review Board live in the congestion zone, so they will not feel the pain of these huge fees on a daily basis, unless they choose to. They are not representative of lower- and middle-income citizens such as those in our community.

While the goals of reducing car congestion and improving the environment are admirable, as residents within the zone caught up in the net of congestion pricing, we object to having unfair, inequitable, and exorbitant costs imposed on our community while other Manhattan residents are exempt from a significant financial burden and insist that the program include significant exemptions for those living in the zone.

Very truly yours,



Susan Steinberg  
President