



**Burt Lazarin**  
Chair

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District Manager

CITY OF NEW YORK  
**MANHATTAN COMMUNITY BOARD FOUR**  
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January 14, 2019

Polly Trottenberg  
Commissioner  
NYC Department of Transportation  
59 Maiden Lane, 37<sup>th</sup> Floor  
New York, NY 10037

Andy Byford  
President  
New York City Transit  
2 Broadway  
New York, NY 10004-2207

**Re: Criteria for locating Long Distance bus stops on our streets/sidewalks**

Dear Borough Commissioner Pincar and President Byford,

As Manhattan Community Board 4 (MCB4) continues to review a never ending flow of applications for curbside Intercity Long Distance (LD) bus terminals on our district's congested streets and sidewalks, we look forward to the day when our district is served by an updated and expanded Bus Terminal. The recently published Metropolitan Transportation Sustainability Advisory Workgroup Report 22 emphasized that our present situation is not acceptable: "With respect to private commuter buses, there must be an effort to find adequate off-street parking to reduce their contribution to congestion. They should not be assigned curb space needed for commercial deliveries and other purposes." Until that promised day, it would be wise to develop rational criteria for locating provisional LD terminals and stops. There are several factors to consider when locating a stop, such as impact on traffic congestion, sidewalk capacity and extant obstructions, and pedestrian and passenger safety.

One thing we can all agree upon is that the location of a provisional LD bus stop should not have a negative impact on MTA Bus service, be it SBS or regular service routes. At a time when the MTA is committing to improve bus service and is seeking significant capital funding to assist in this endeavor, it is incumbent to all agencies to fully support this effort. We were surprised to learn that a recent applicant, LX Transportation Bus Company, was advised to apply for a location (Ninth Avenue between 42<sup>nd</sup> and 43<sup>rd</sup> Streets) in an MTA bus lane, and in an SBS

(M34A) and a regular bus stop (M11, a Pokey Award winner). These two bus stops in effect take up the entire block, and to locate a separate bus service there would not only sow confusion and conflict, it would force MTA bus drivers to stop in the adjacent through-lane, creating unsafe conditions, particularly for elderly and disabled passengers.

We would also ask that you review the fees paid for these provisional stops. In another recent case, it seems that an operator (Bieber Tourways), which had a long history of operating out of the Port Authority Bus Terminal (PABT) sought to shift its operations to curbside locations because of its incapacity to pay for the bus terminal gate. As a result, a bad operator now has a competitive advantage over the good operators in the terminal, since the curbside stop provided is located only one block away from its former gate in the bus terminal. This sets a bad precedent: there should not be any financial incentive to operators to seek curbside locations.

There are other considerations, such as the community and environmental impact of the operator's fleet. We'd like to explore the development of incentives for operators with zero-emission fleets, safe driving records, and good standing with all authorities. In the coming year, we'd like to partner with all the stakeholders and our elected officials on a task force to develop this set of guidelines for locating provisional LD bus stops. If this set of guidelines is to contain one hard, fast rule, it would be to keep LD bus locations out of MTA bus lanes and stops. At Manhattan Community Board 4's January 2<sup>nd</sup> Full Board Meeting, the Full Board voted with 34 in favor, 1 against, 0 abstaining and 0 present but not eligible to vote on these recommendations.

We look forward to your participation and support of these goals.

Sincerely,



Burt Lazarin  
Chair  
Manhattan Community  
Board 4



Christine Berthet  
Co-Chair  
Transportation Planning  
Committee



Dale Corvino  
Co-Chair  
Transportation Planning  
Committee

Cc: Hon. Jerry Nadler, U.S. Congress  
Hon. Brad Hoylman, New York State Senate  
Hon. Linda Rosenthal, New York State Assembly  
Hon. Richard Gottfried, New York State Assembly  
Hon. Corey Johnson, City Council Speaker  
Hon. Helen Rosenthal, City Council  
Hon. Gale A. Brewer, Manhattan Borough President  
Ed Pincar, Manhattan Borough Commissioner, Department of Transportation