

CITY OF NEW YORK
MANHATTAN COMMUNITY BOARD FOUR

424 W. 33rd Street, Suite 580 New York, NY 10001
tel: 212-736-4536 fax: 212-947-9512
www.nyc.gov/mcb4

JEFFREY LEFRANCOIS
Chair

JESSE R. BODINE
District Manager

March 21, 2023

Ed Pincar
Manhattan Borough Commissioner
NYC Department of Transportation
55 Maiden Lane, 37th Floor
New York, NY 10038

Kevin O' Toole
Chairman
Port Authority Bus Terminal of New York & New Jersey
4 World Trade Center, 150 Greenwich Street, 22nd Fl.
New York, NY 10006

Re: Intercity Bus Stop – Eastern Coach Inc. – West 31st Street (8/9)

Dear Borough Commissioner Pincar and Chairman O'Toole,

Manhattan Community Board 4 (MCB4) at its March 1st Full Board meeting, voted by 26 in favor, 0 opposed, 0 abstaining, and 0 present but not eligible to **oppose** the application by Eastern Coach Inc (to operate as part of the FLIX franchise) to establish a two bus-length bus stop on the North side of West 31st Street (8/9), close to the corner of Eighth Avenue.

In addition, MCB4 has suggested the following locations instead:

- North side of Dyer Avenue, close to Ninth Avenue, currently on a Port Authority property occupied by free parking.
- North side of West 33rd Street, close to Ninth Avenue (east side), where MCB4 had already approved a stop which was previously installed.
- West 36th Street and 11th Avenue where FLIX Bus has access to a large bus stop as the result of their merger with Greyhound – former owner of Bolt Bus.

The applicant proposes an arrival and departure every 30 minutes. We have significant concerns with the placement of the stop and its operation on the sidewalk:

- This area is currently dedicated to taxi pick-up and drop-off that serves two entrances/exits of Moynihan Train Hall. The volume of taxis fluctuates with the train schedule, but taxi congestion can be frequently observed where taxis block the crosswalk or even Eighth Avenue. With the new lane configuration of Eighth Avenue it is important that taxis have ample space on West 31st Street and do not block the turning movements from Eighth Avenue.
- The sidewalk is relatively narrow, because of the presence of large security bollards along the curb. The pedestrian movements are significant on this sidewalk: In addition to carrying Moynihan travelers with luggage who pass through or are connecting to a taxi, this block connects Penn Station commuters to Hudson Yards. With departures and arrivals so close to each other, it is clear that the sidewalk will be impassable for pedestrians most times of the day. Based on our experience of this type of operation, queues of passengers will occupy a minimum of 4-ft and loading/unloading of luggage with groups of passengers picking them up will occupy the balance.

FLIX Bus already occupies a private parking lot with a capacity of six to seven buses on the south side of the street. We are grateful to FLIX Bus that they heeded our advice five years ago and chose an off-street facility to launch their operations. We pointed out the following issues with the current operation to FLIX Bus management:

- The existing location is poorly maintained with large potholes and an abandoned shack.
- We have observed buses idling in excess of the permitted three minutes.
- We have received complaints that the buses honk on West 30th Street when there is congestion due to the garage on the street.
- The lot configuration could be optimized to meet the additional capacity they seek.

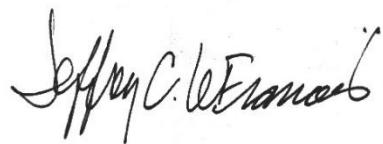
Lastly, we are concerned that Eastern Coach has a less-than-acceptable safety record:

- This carrier has seven violations in the last year, putting it over the intervention threshold for unsafe driving by the Federal Motor Coach Safety Administration; three of those violations are for speeding more than 15 mph over the speed limit. They also experienced a crash with injuries.

The Department of Transportation (DOT) letter notes that this stop would be the reinstatement of an intercity bus stop to be shared by Gunther Charters Inc. Until 2009, Gunther had a stop on West 31st Street, on the east side of Eighth Avenue. Their stop was temporarily moved to the west side of Eighth Avenue during a construction period and before Moynihan Train Hall was built. Subsequently their stop was moved back to the East side of Eighth Avenue.

Because of the changed context, the adjacency to the new Moynihan Train Hall and the reconfigured Eighth Avenue, we do not believe the reference to the Gunther stop is relevant.

Sincerely,



Jeffrey LeFrancois
Chair
Manhattan Community
Board 4



Christine Berthet
Co-chair
Transportation Planning
Committee



Dale Corvino
Co-chair
Transportation Planning
Committee

cc: Matthew Daus, Representative, Eastern Coach Inc.