



CITY OF NEW YORK

MANHATTAN COMMUNITY BOARD FOUR

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Margaret Forgione
Manhattan Borough Commissioner
NYC Department of Transportation
59 Maiden Lane, 37th Floor
New York, NY 10038

Re: Improvements to Long distance Bus permitting process

Manhattan Community Board 4 (CB4) has now reviewed two requests by the Department of Transportation for Long Distance Bus Stops under new regulations to implement a state law requiring city approval and Community Board review for intercity bus locations. Based on this short experience we'd like to request some adjustments to this brand new procedure.

- A more holistic approach to granting bus permits in our area
- A complete set of information including the copy of the original application
- The use of both legal and commercial names on the web, the permit and the stop sign
- The publication of the full terms of each permit on the web as mandated by the rules.

Planning

It is our hope that as the City's department responsible for transportation planning, the Department of Transportation (DOT) will study the matter of long distance bus terminals holistically.

- We were asked to approve a permit in a location shared with another bus company. Since most of the issues are cumulative between the two companies, it would have make sense to receive information about both in order to make a proper determination.
- Our neighborhood harbors both long distance and commuter shuttles companies. Without considering all the permits to be granted and the existing supply of spaces, we may approve stops for long distance buses in locations that would be more appropriate for commuter shuttles.

In the short term, CB4 requests that for any permit on a shared curb space, or where there are already approved stops (departures or arrivals), DOT provides information for all the companies on that block's curb.

CB4 also requests that as much as possible, the permit applications be grouped together and DOT work in advance with CB4 to identify suitable locations.

In the long term it is our hope that DOT study long distance buses as part of a master plan based on data and input from the carriers and the communities. The current ad hoc approach requires

community boards and DOT to react negatively when presented with adverse impacts, instead of shaping the future with a plan where carriers could be choosing from bus stops already vetted by both DOT and the community.

Information

A second concern and a critical one, is the incomplete information CB4 receives for each request.

Subdivision d of section 4-10 of Chapter 4 of Title 34 of the Rules of the City of New York provides that **(i)** An application for new Intercity Bus Permit(s) or for the renewal of Intercity Bus Permit(s) must be submitted on a form provided by the Department, which will include, but not be limited to, the following information:

- (A)** Name, address, telephone number, e-mail address and motor carrier number of the intercity bus owner or operator, United States Department of Transportation number and/or New York State Department of Transportation number for each bus that would use the proposed location(s).
- (B)** Proposed on-street bus stop location(s) and two or more alternative locations for each proposed location.
- (C)** Number of bus trips per day that would use the proposed location(s).
- (D)** Proposed intercity bus schedule for the proposed location.
- (E)** Final destination(s) of proposed bus service.
- (F)** Number of passengers per bus anticipated for each bus trip.
- (G)** Planned garage or other parking location of the bus during periods when the bus is not being used to pick up or drop off passengers.

The information provided to CB4 has not included **(B)** two or more alternative locations proposed, **(F)** the proposed number of passenger on each bus, and **(G)** the garage or parking locations for layover. Some of the other data had to be requested separately.

In addition, we had previously indicated that the following information would be very useful for the Community Boards to evaluate this and future applications:

- Total peak arrival and departures permitted daily, and number of buses loading and unloading per peak and non-peak hours; per company and per terminal location
- Schedule of departures and arrivals for this application per company and per terminal
- Location of layover buses (per company and per terminal)
- Routes used to reach city exits
- Estimated size of area (in square feet) required to accommodate passengers waiting/loading during peak and non-peak hour (using a reasonable estimated square feet per passenger and passenger arrival time based on statistics at peak hours) per company and per terminal
- Estimated size of area (in square feet) required to unload arriving buses and to sell tickets during peak and non-peak hour per company and per terminal;
- Current overall basic safety rating by the Federal Motor Carrier Safety Administration
- Current vehicle and vehicle turn counts at nearby intersections;
- Sidewalk location plan for passenger waiting/departing and food vendor carts (food vendor carts typically locate near intercity bus loading/unloading areas) for this company and others using the stop.

- Plan for rest room accommodations for waiting passengers;
- Number of staff allocated to manage the ground operation.

CB4 requests that a full copy of the Application be forwarded to the Community Board along with the notification letter. This is a common procedure used by other agencies like DCA, or the SLA. The balance of the information would be most useful to properly evaluate potential impacts on the community of curbside terminal locations for intercity buses.

Naming and Permitting

There is currently much confusion about which company is actually permitted at a given stop. One example is the company MCIZ being permitted at West 31st Street (between Eighth and Ninth Avenues) but the buses stopping there are all marked GoBus.com. The same is true of Gunther Buses, with all buses marked as Tripper.

This labeling poses a few problems:

- What is the relationship between the permitted company and the bus operator? It was our understanding that the law's provision "bus permit applications include identification of the intercity bus company, identification of the specific buses to be used," intended to clarify those relationships for safety and accountability purpose.
- How are customers to recognize the stop for the company if it is labeled with an obscure corporate name? Currently companies install illegal sandwich boards to the stop for their customers to recognize them.
- How are customers to verify the safety information for a Tripper bus, if the bus company registered and permitted is Gunther?
- How are local residents to verify that GoBus.com is permitted at a location when the stop bears the name of MCIZ? Would a 311 call be recognized by DOT to complain about GoBus.com?

CB4 recommends that the names that appear on the buses and are known to the public appear along the corporate name on all documents: street signs, the license issued the application approved and the on-line list of approved stops.

Transparency

According to the Subdivision d of section 4-10 of Chapter 4 of Title 34 of the Rules of the City of New York provides that (iii) The Department will post on its website all approved on-street bus stop locations and a copy of all approved applications within thirty days of approval.

We were not able to find the copy of any approved applications on line.

CB4 appreciate the difficulty of putting in place new permits and procedures. We look forward to continue working with DOT to make the process simpler and more effective for the public.

Sincerely,



Christine Berthet
Chair



Jay Marcus
Chair, Transportation Planning Committee