



CITY OF NEW YORK

MANHATTAN COMMUNITY BOARD FOUR

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District Manager

June 6, 2013

Borough Commissioner Margaret Forgione
Department of Transportation
59 Maiden Lane, 35th Floor
New York, NY 10038

Re: Bus Stop Guidelines

Dear Commissioner Forgione:

Manhattan Community Board 4 (CB4) appreciates the opportunity to offer suggestions for guidelines in the placement of Long Distance Bus Stops, a matter in which we have unfortunately acquired a lot of experience.

First, we note that the proposed rules allow existing permitted stops to be “grandfathered” for another three years without being subject to the new proposed rules. In our district, this would allow Bolt Bus to continue to operate on the northwest corner of Eighth Avenue and West 34th Street, in conflict with a bus stop to be soon converted to an SBS station, and adjacent to a large venue. This is unacceptable.

Second, we submit that criteria should be different for On-Street Terminal loading locations versus intermediary drop off locations, which handle much less volume of passengers, and where there is no passenger loading taking place.

We propose that for the On-Street Terminals, two sets of criteria be established: one for the vehicles and one for the sidewalk. The granting of the On-Street Terminal location would be based on compliance with both sets of criteria. Another set should be established for the intermediary drop off locations.

In all cases, the evaluation should be based on conditions during peak weekly travel hours.

On-Street Terminal Vehicular Criteria

On-Street Terminals should be located in proximity of subway stations and SBS stations, but they should not be located in residential or school streets, in front of a sidewalk cafés, or on congested commercial arterials or streets in commercial districts. With sidewalks already over capacity at peak hours on most of the midtown streets and avenues, restricting the pedestrian right-of-way at peak hours is unsafe: pedestrians then must step into traffic to make their way.

Bus terminals should never be situated in a marked bus lane, where they present an obstacle to public transportation or on a school block where school buses congregate.

Bus On-Street Terminals should not replace charter bus parking, loading and unloading zones that are needed by adjacent commercial uses. These services are critical to the city's services and economy and cannot be shortchanged.

If located in proximity to an MTA bus stop, the bus On-Street Terminal should always be located before (based on the direction of the traffic flow) the bus stop, and at such a distance to allow two articulated MTA buses to use the MTA bus stop without impediment. This avoids the On-Street Terminal overflowing into the bus stop and forcing MTA passengers to access the bus in an unsafe manner in traffic.

Bus companies should receive a permit for a specified length of curbside marked on the ground for easy recognition and enforcement.

DOT should establish the length of the stop that is required for the weekly (typically Friday afternoon or weekend) peak number of buses (not the number of departures since there may be multiple buses per departure) in one hour. Without such, double parked buses will impede the traffic when it is at its worst and result in idling causing health concerns for surrounding residents and businesses.

For larger On-Street Terminal areas, a layover bus area should be identified in proximity to absorb buses queuing to reach the On-Street Terminal area and avoid double parking, idling or bus cruising.

Every On-Street Terminal should be equipped with a sign indicating: "Stop Engine During Loading and Unloading - \$2,500.00 fine," which typically encourages enforcement.

On-Street Terminal Sidewalk Criteria

As indicated above, bus companies should receive a permit for a specified length of sidewalk. DOT should establish the maximum length of passenger queue that will be needed at the On-Street Terminal for the weekly (typically Friday afternoon and weekend) peak number of buses (not the number of departures since there may be multiple buses per departure) in one hour. Without such, the line of passengers will overflow and block the pedestrian right-of-way, forcing pedestrians to walk in the street and risk their lives in traffic.

The passenger queue should be on sidewalks with a minimum width of 14 feet. The passenger queue should be no larger than four feet wide (one passenger width), delimited by stanchions and leave a minimum of nine feet and six inch width for pedestrian right-of-way. This is the standard width used to ensure safe pedestrian travel in spite of other sidewalk obstructions in the city.

The queue boundaries should be marked on the sidewalk for easy recognition and enforcement. The queue should be established at the curb (rather than against the building) to avoid creating constant obstruction to the pedestrian right-of-way at the loading point. With departures every 15 minutes and a loading time of ten to 15 minutes, the pedestrian right-of-way is permanently

obstructed for many hours at a time. This forces pedestrians to walk in the street, typically at times when the traffic is most intense.

Either end of the queue should maintain the following distances from:

- Park entrances and other crowd generator entrances: 100 feet
- Subway stations or other bus stops: 100 feet
In both cases, a pedestrian path of nine feet and six inches will not be sufficient to absorb the volume of pedestrians entering or exiting such spaces, causing pedestrians to step in traffic. It is important to leave a buffer for the crowds to disperse before they are constrained into a narrow passageway.
- Residential entrance: 100 feet
- Storefront: 100 feet
Our experience is that bus idling for hours will have health impact on store employees and residents. Further, passengers will take shelter in either nearby residential buildings or in stores, causing major disturbances in those premises and obstructing the flow of residents or customers. A clear distance should separate such uses.
- Commercial entrance: 25 feet

Ticket Sales should be forbidden in the street and instead tickets should be issued on board or on the web to prevent further obstructions of the pedestrian right-of-way.

Destination panels should be installed to prevent loud announcements that create noise nuisance and health problems for neighbors.

Nearby bathrooms should be identified or, for larger stops, Portosans installed to prevent urinating in the street or in backyard, which is unhealthy for others.

Every On-Street Terminal should be equipped with a large sign indicating: “Stop engine during loading and unloading - \$2,500.00 fine.”

Intermediate Drop-Off Stops Criteria

The Intermediate drop-off stops should be subject to the same criteria as the On-Street Terminal stops - in particular, not be located in residential or school streets and in front of sidewalk cafés - except for the following, either end of the stop should be located at a distance from:

- Parks and other crowd generators entrance: 50 feet
- Subway stations or other bus stops: 50 feet
- Commercial entrance: Ten feet
- Residential entrance: 25 feet
- Storefront: 25 feet

Based on the criteria outlined above, it would make sense for the City to proactively identify areas where regrouping bus activities make sense due to their zoning, accessibility by public transportation and rapid access to Highways. This would constitute a master plan for locating

On-Street Terminals. EDC has successfully taken this approach for the Hunts Point Food Terminal.

CB4 has long advocated for the construction of Bus garage to absorb the enormous volume of buses on our streets. In the 2005 Hudson Yard rezoning FEIS, such a garage was committed to be completed in 2025. With the rapidly growing bus activity, there is an acute need to complete a new terminal and take these operations off the sidewalks of Manhattan, where they do not belong.

We look forward to the hearing on June 10th.

Sincerely,



Corey Johnson
Chair



Christine Berthet
Co-Chair, Transportation
Planning Committee



Jay Marcus
Co-Chair, Transportation
Planning Committee