



CITY OF NEW YORK

**MANHATTAN COMMUNITY BOARD No. 4**

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**J. LEE COMPTON**  
Chair

July 27, 2006

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

**Re: Comments on Draft Truck Route Study**

Manhattan Community Board No. 4 is pleased that a draft of the long-awaited Truck Route Study and its accompanying technical memorandum has been released. The study offers a comprehensive look at a complicated issue and offers several creative and timely solutions. As the report notes, there has been no comprehensive look at or changes to truck regulation and policies in the last 20 years despite an increase of over 35% in truck volume, a substantial change in land uses in many city areas, and changes in truck delivery systems, including increased use of “just in time” inventory management to reduce storage costs.

Though we feel the report has substantial gaps that we note below, we urge DOT to implement most of its recommendations. Among the items we hope the City will move forward with are:

- **Permitting courier vans and small delivery vehicles (which make up over 50% of the commercial trucks in the city) to use certain parkway routes.** In addition to reducing the volume of these vehicles on local streets, we believe this revision will likely reduce the number of these trucks that use Manhattan streets to get from New Jersey to Queens and Brooklyn.
- **Creating a simplified signage system that includes both positive and negative (“No Trucks permitted except for deliveries”) signage.** The report documents that the New York City sign system is overly complicated, has differing designs, and is poorly understood by truck drivers. It also does not currently include any negative signs. A simplified, uniquely colored sign system will enhance both truck route usability and enforcement.
- **Encouraging off-peak (5am to 7am) delivery times:** The report notes that very few trucks deliver during off-peak hours, though most would be interested in exploring that option. We encourage DOT, in conjunction with small business and economic development agencies, BIDS, and community newspapers to create incentives to encourage businesses to utilize off-peak deliveries;
- **Creating time restrictions on the use of local truck routes.** The report recommends restricting the use of Local Truck Routes from 10pm to 6am, except for deliveries. Though we question the consistency of including 5am to 6am, given the overlap with the recommendation to encourage off-peak deliveries, we feel that this restriction will reduce evening noise and quality of life complaints on these often residential streets;
- **Increased enforcement and police education.** The report notes an acute lack of enforcement of truck routes and limited police training. We support the recommendation to improve enforcement through such techniques as providing police with laminated truck route cards, use of the TrafficStat system for monitoring truck usage, and tracking of complaints and summonses to identify problem spots for increased enforcement. These recommendations seem like cost effective changes that will address the lack of enforcement.

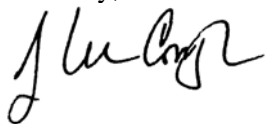
While we admire the thoroughness of the report in many ways, it still leaves substantial inadequacies that we feel should be addressed:

- **No specific study with recommendations on Lincoln Tunnel access routes:** As this Community Board has pointed out, the current Lincoln Tunnel access routes have diminished the quality of life for many of our residential streets and severely impacted 9<sup>th</sup> Avenue, Hell's Kitchen's major retail corridor, with truck traffic being a major cause. In fact the report notes that 9<sup>th</sup> Avenue is the second most dangerous corridor for truck accidents (33 accidents per mile). However, likely because much of the analysis is based on pre-9/11 data (after 9/11 large trucks were barred from the Holland tunnel), the Lincoln Tunnel area is not represented in any of the 10 "high traffic" areas for which DOT recommends additional study and recommendations;
- **Limited recommendations for expanding use of modern technology:** GPS systems can greatly improve trucker knowledge and use of truck routes and, as the technology advances, assist drivers to avoid congested routes. While the report does recommend simplification of the City truck related websites and coordination of on-line mapping services (which the report notes 60% of trucking companies use), it does not acknowledge the rapid growth in the use of GPS and their potential benefits. We would urge the city to encourage the creation of GPS software that includes truck routes (with real-time warnings when leaving truck routes) and is connected to a central traffic monitoring system;
- **Lack of policy recommendations for the City to make to state and federal agencies:** While the report notes the confusion between state, Federal and city definitions of trucks, it makes few recommendations (outside of recommending the city permit trucks with 53' trailers onto certain major roads) for devising consistent regulations. While the report acknowledges pollution as a major community concern, it does not make any recommendations regarding encouraging the use of reduced diesel pollution equipment. We urge the report to include recommendations that can guide the city lobbying efforts at the state and federal level, particularly on these crucial issues.

Finally, the Community Board objects to the proposed elimination of the Limited Restriction Zones. These zones do not permit trucks to operate, enter, stop, stand or park within certain zones, except for the purpose of making deliveries within that zone. These zones include portions of Community Board #4, notably in Chelsea as well as areas of Greenwich Village and Chinatown. We feel these zones may be appropriate given the unique features of these neighborhood streets and their proximity of residential and industrial/commercial uses and would encourage DOT to move cautiously and with substantial community input before removing these areas.

The Community Board appreciates the opportunity to comment on the Truck Study and looks forward to working with DOT as it moves to finalize the Truck Study and implement its recommendations.

Sincerely,



J. Lee Compton  
Chair  
Manhattan Community Board No. 4



Jay Marcus  
Chair  
Transportation Planning Committee

cc: Manhattan Community Boards