



CITY OF NEW YORK

**MANHATTAN COMMUNITY BOARD FOUR**

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**JOHN WEIS**  
Chair

**ROBERT J. BENFATTO, JR., ESQ.**  
District Manager

October 26, 2009

Rep. Jerrold Nadler  
201 Varick Street, Suite 669  
New York, New York 10014

**Re: Federal Rules for Long Distance and Charter Buses**

Dear Representative Nadler:

Manhattan Community Board 4 (CB4) is writing to you to seek federal assistance in mitigating a serious environmental problem -- the explosive proliferation of on-street pick-ups and drop offs by bargain-priced long distance buses. We suggest that federal rules be changed to allow the city to apply equitable regulations to all buses, including interstate buses. Our community is a strong supporter of private mass transit, provided there is a framework to do so efficiently, without crippling local mass transportation.

The problem in our area had its origins a few years ago when one or two small, independent bus lines began service from the area around Penn Station. Each year since, there has been a geometric increase in the number of bus companies, destinations and daily trips. Currently, we are aware of seven different companies. Since this information was gleaned from the Internet, we suspect there may be more operations we are not aware of yet. The most common destination is Washington, DC or its suburbs. This is followed by Boston, Philadelphia, Baltimore, Albany, Toronto and Richmond, VA. (See attached table showing number of trips by company, destination, day of week, and street location.)

The number of departures and arrivals from streets in our vicinity varies by day of week. Departures range from 145 to 223. Assuming arrivals are about the same number, this would mean around 300 to 450 bus trips through the neighborhood each day. We cannot tell how many arriving buses simply turn around and depart, how many go into or come out of layovers or how many are taken out for servicing and then returned. It is clear, however, that the number of trips by mammoth sized buses traversing our neighborhood is greater than simply the number of departures and arrivals.

It is worth noting that the low cost bus business is no longer exclusive to small, independent operators. Bolt Bus, a Greyhound subsidiary, operates 82 round trips from our area on Fridays and 86 on Sundays. Megabus, a Coach USA subsidiary, operates 61 trips on Fridays.

The specific problems caused by the long distance bus explosion are many and obvious. Let us cite a few key ones.

- Two companies – Bolt and Washington Deluxe – use 34<sup>th</sup> Street for both bus arrivals and departures. They thereby abuse the bus stops provided for MTA buses. Even more important, they block the dedicated bus lanes intended to speed cross-town local bus service. Long distance buses take considerable time waiting in the bus stops, loading and unloading luggage and passengers. Bolt Bus often has more than one bus in the same location. (see attached photograph)
- Megabus arrivals take place at the MTA bus stop on 7<sup>th</sup> Avenue South of 28<sup>th</sup> Street. The empty buses – as many as 60 a day -- then go South to 25<sup>th</sup> Street and turn West on 25<sup>th</sup> Street, a relatively quiet residential street bordering several school zones.
- The lines of travelers waiting for buses, loading with their luggage or unloading, often occupy the entire width of the sidewalk in an area where sidewalk congestion is already well above acceptable. With departures and arrivals every ten minutes, this results in a complete obstruction of sidewalks at peak hours in the day.

The long distance bus problem would be bad enough by itself. However, it is not alone. It comes on top of numerous other bus problems CB4 has had to face over the years. These include a huge increase in the number of small commuter buses unable to use the Port Authority Bus Terminal and relegated to streets in the Terminal's vicinity, a growing number of charter and tour buses and a large number of sightseeing buses.

More general in nature is the increase in pollution levels in a community already severely impacted with some of the highest asthma hospitalization rate in Manhattan, due to many contributing factors like extensive traffic congestion and a doubling of truck traffic in the last nine years.

Finding a solution to this massive problem is not easy. It will require serious exploration and creative thinking. It will probably be expensive. But it is essential that something be done. CB4 suggests two steps in that direction:

- First, Interstate Commerce Commission rules must be modified to allow the City to regulate bus traffic and the use of streets and sidewalks by interstate buses. The regulation should include selection of proper pick up, drop off, and layover locations. Preferred routes in and out of the city, and between layover and stops should be addressed as well to avoid residential streets.
- Second, the regulation should allow competitive licensing of sidewalk/curb space, as it is the case for all other private use of the curb or sidewalk in the city.

CB4 is indeed very much in favor of bus usage instead of car usage. However, in the low cost air travel, usage of inexpensive gates, usually in remote inexpensive locations, plays a critical role in the pricing of these solutions. In this case, allowing the free use of expensive and central public facilities at the expense of the MTA and the pedestrians, results in an unfair competition with Amtrak - a cleaner and more efficient mean of transportation - which pays the full burden of its central location and gate infrastructure.

This regulation will be critical to encourage the use of much needed bus garage and bus terminal as discussed in our corollary October 26, 2009 letter.

CB4 hopes our elected officials share our concern over the growing problem our city and our community are facing. We need your help.

Thank you.

Sincerely,



John Weis  
Chair  
Manhattan Community Board No. 4



Christine Berthet  
Co-Chair  
Transportation Planning Committee



Jay Marcus  
Co-Chair  
Transportation Planning Committee

CC:

CB1, CB2, CB5, CB7  
Department of Transportation, Port Authority, Metropolitan Transportation Authority  
Deputy Mayor of Economic Development, Richard C. Lieber  
Councilmember John Liu  
Mayor's Community Affairs Unit, Pauline Yu  
CB4 Elected Officials

**ATTACHMENT**

Daily Long Distance Bus Departures From Streets Around Penn Station  
 Pick up or drop off location is the same unless otherwise indicated

Rev. 1  
 (10/22/09)

	LOCATION	MON.	TUES.	WED.	THUR	FRI	SAT	SUN.
Bolt Bus (Greyhound subsidiary)								
NYC to Washington DC	(7)	19	14	14	15	26	20	27
NYC to Philadelphia	(2)	20	12	12	20	22	22	22
NYC to Boston	(2)	17	14	20	26	26	18	25
NYC to Baltimore	(7)	7	7	7	7	12	9	12
DC2NY	P(3) D(4)	2	2	2	2	7	3	6
Washington Deluxe	(7)	3	2	2	8	2	2	8
Eastern Travel								
NYC to Washington DC,	(8)	13	13	13	13	15	15	15
NYC to Richmond	(8)				1			
Vamoose								
NYC to Bethesda & Arlington	(5)	6	4	4	6	12	7	16
Megabus (Coach,USA subsidiary)								
NYC to Boston	P(1) D(6)	11	11	11	11	13	12	13
NYC to Philadelphia		15	13	13	15	16	6	6
NYC to Toronto		4	4	4	4	4	4	4
NYC to Washington DC		19	17	17	19	24	24	24
NYC to Albany		4	4	4	4	4	4	4
AA Bus								
NYC to Baltimore	(9)	13	11	8	9	12	11	15
NYC to Albany	(9)	4	4	3	3	5	4	6
Hola Bus -- Washington, DC	(10)	4	4	4	4	5	6	6
Tripper Bmus - MD & VA	(12)	2	2	1	2	5	3	5
MVP Bus -- DC & Baltimore	(11)	7	7	7	7	12	7	9
Total daily departures		170	145	146	176	222	177	223

Pick up (P) and drop off (D) locations

- |  |   |
|--|---|
| (1) 31st near 8th, north side, by Penn Station             | (7) 33rd St. East of 7th Ave, north sider |
| (2) 34th West of 8th, North side, near Manhattan Center    | (8) 7th Avenue, West side, south of 34    |
| (3) 34th Street between 7th and 8th, north side, mid block | (9) 34th St. near B'way                   |
| (4) 34th Street between 7th and 8th, south side, mid block | (10) 9th Avenue & 49th St, E. side        |
| (5) 31st West of 7th, South side                           | (11) 252 W.31St.                          |
| (6) 7th Avenue south of 28th St., MTA Bus stop             | (12) 151 W. 34St. (Macy's)                |

Note: Each day there are approximately the same number of arrivals as departures. It is not known how many arriving buses are turned around and become departing buses, how many go into layover or servicing and how many departing buses have been in waiting..



34<sup>th</sup> Street West of 8<sup>th</sup> Avenue. At MTA bus stop and in the 34<sup>th</sup> Street Bus Rapid Lane with luggage bay open. The buses are idling. There is such an arrival/ departure every 10 minutes at this location.



9<sup>th</sup> Avenue at 44<sup>th</sup> Street. Tourists wait for their Charter bus, at an MTA bus stop. Restaurant and Theater goers can hardly make their way.