



CITY OF NEW YORK

MANHATTAN COMMUNITY BOARD FOUR

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District Manager

December 6, 2013

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

Re: Gunther bus stop at north curb of West 31st Street and Eighth Avenue

At its full December 2013 full board meeting, Manhattan Community Board 4 (CB4) voted to oppose a Long Distance Bus Curbside Terminal (On street Bus Loading and Unloading zone) for Gunther Bus (DBA Tripper) on the north curb of West 31st Street just west of Eighth Avenue. CB4 requests that the Department of Transportation (DOT) study a preferred alternative: that the terminal be located on West 33rd Street between Tenth and Twelfth Avenues or to expand the length of the West 31st Street terminal to three-bus lengths (210 feet).

There is an existing one-bus (70ft.) length terminal on the North side of West 31st Street along the Post office, opposite 320 West 31st street. Two companies Tripper and MCIZ (DBA GoBus.com) share the terminal. GoBus.com is continuing its operation and Tripper is requesting a new license, after two years of operation at this location. The stop is marked "temporary construction regulation" so it is not clear where the permanent stop would be located on that curb.

The proposed permit would allow 35 departures to Virginia/Maryland and 35 arrivals for Tripper at that location. This would represent an average of 170 departures/arrivals per week for both companies, with a peak of 32 on Fridays during the hours of 8:00 a.m. to 12 p.m. serving existing destinations.

CB4 opposes the new license for several reasons.

- The available space is insufficient to accommodate the anticipated volume of buses arriving and departing at the same time. There are many (14) occurrences, including at peak traffic hours, when the schedule of arrival and departures of the two companies necessitate two-bus stops. In one case, three-bus lengths would be required when two departures and one arrival are scheduled at the same time. The West 34th Street partnership has documented such situation, where three buses are seen parked at curbside. The applicant indicated that when there is conflict, the buses circle around the block until the space becomes available.

The traffic in this area is intense: West 31st Street is a single lane street that feeds directly into the Lincoln Tunnel entrance on Dyer Avenue. There are significant back ups on West 31st Street and on the Eighth Avenue turn lane, all the way to West 30th Street as it sometimes takes ten minutes for a single car to turn onto West 31st Street from Eighth Avenue. Navigating the bike lane at this intersection is truly hazardous. Buses cruising around the block, on Ninth Avenue, West 30th Street, Eighth Avenue and back add to the back-ups that plaguing this area due to the exit from the Lincoln Tunnel at West 30th Street. While the company has directed its driver to use West 30th and West 34th Street, Penn South residents have often reported that long distance buses use their residential streets (West 28th to West 23rd) to the south as a detour.

- The company is currently using bus parking spaces shared with charter and tour buses on a first come first served basis. These parking spaces are very often full and no dedicated layover location has been identified. We have received documentation showing the stop occupied with three buses in layover mode. Again Penn South residents have often complained that their residential streets are being used illegally for Bus Parking. There are no designated bus parking spaces in the vicinity that would be appropriate to serve this terminal.
- There is construction underway at the Northwest corner of West 31st Street and Eighth Avenue. This is part of the larger construction just starting for the Post Office building. We expect the construction zone to expand. It seems preferable to relocate this bus company once instead of multiple times in the coming months.
- Although the company has educated its drivers to respect the three minutes idling rule, they do not seem aware of the 1 minute idling rule in the vicinity of a school: buses have been observed idling continuously during loading and unloading even though there are located right across the street from the TCI College of Technology. The operator also uses illegal sandwich boards to advertise their terminals. Although we asked the operator to remove the signs, they had not removed the board in the week after our meeting.
- The Federal Motor Carrier Safety Administration has flagged Gunther Charter for Unsafe Driving Basic Overall status as being worse than 81.9 % companies in the group. Just in the last 6 months, the carrier has received three violations for speeding and refusing to obey a traffic signal. It is not prudent to let such carriers travel on streets with a heavy pedestrian and bicycle traffic.
- Neighboring business organizations spoke up in opposition to this terminal.

CB4 opposes granting the license for a Long distance Bus Curbside Terminal at this location as proposed. We ask the applicant and the Department of Transportation to evaluate the following alternatives and to present their findings at the December Transportation Committee.

- There are two possible locations for a one-bus terminal, on West 33rd Street between Tenth and Eleventh Avenues on the north side of the street, and one possible location on West 33rd Street west of Eleventh Avenue, west of the Bolt Bus terminal, where a terminal and a dedicated layover could be accommodated. This would be a vastly better option since it would remove traffic from a very congested area and remove illegal thru traffic and parking in residential areas. This is CB4's preferred option.
- Create two distinct stops on West 31st Street one for each company, and an additional arrival stop shared between the companies, for a total of three bus lengths and identify a permitted layover location.

Additionally, CB4 requests that the applicant provide a driver safety enhancement plan and that the following method of operations, agreed to by the applicant, be included in the permit:

- Applicant personnel will be on site at the stop 30 minutes before the departure or arrival time and keep order on the sidewalk until the buses depart:
- The passenger queues will be four feet wide, aligned along the building, delimited by post and ropes or stanchion system,
- Buses will not idle, no sandwich boards will be used

Thank you for your assistance and partnership with CB4 in implementing an appropriate and fair intercity bus location application review process.

Sincerely,



Christine Berthet
Chair



Jay Marcus
Chair, Transportation Planning Committee