



March 18, 2024

Mr. Rick Cotton
Executive Director
Port Authority of New York and New Jersey
4 World Trade Center
150 Greenwich Street
New York, NY 10007

RE: Port Authority Bus Terminal Replacement Project – Draft Environmental Impact Statement

Dear Mr. Cotton,

On behalf of the American Bus Association (ABA), I submit the following comments to the Draft Environmental Impact Statement or DEIS, issued by the Federal Transit Administration (FTA) on February 2, 2024, in support of the Port Authority Bus Terminal Expansion Project (PABT) proposal by the Port Authority of New York and New Jersey.

The ABA is a trade association representing the private intercity bus/motorcoach industry along with the larger group tour and travel industry, for nearly 100 years. The ABA has over 3,800 members, including bus/motorcoach operators who operate nearly 65% of the equipment on the road, providing all manner of bus services, including scheduled service, charter and tour, commuter operations and airport shuttle service. The ABA's tour and travel members are tour and travel companies, convention and visitors' bureaus (CVBs), destinations and attractions, including many based in the New York and New Jersey area, including nearly all of your current PABT intercity bus tenants. The ABA and its members play a vital role in promoting travel and tourism throughout North America, and particularly in the New York City area.

The President & CEO of ABA, Peter Pantuso, in recent years has served on the U.S. Department of Transportation's (USDOT or Department) National Advisory Committee on Travel and Tourism Infrastructure, which developed the National Travel and Tourism Infrastructure Strategic plan that the Department is currently in the process of updating. The purpose of the update is to support reviving the travel and tourism industry in the wake of the COVID-19 pandemic by promoting intermodal connectivity and investment across all modes of transportation.¹ The ABA believes the PABT project

¹ Fed. Reg. Vol. 88, No. 106, Friday, June 2, 2023 – National Travel and Tourism Infrastructure Strategic Plan; Request for Comment.

could play a key role in USDOT's revival effort, to serve as the premier model for intermodal redevelopment projects.

The ABA has closely followed the progression of the PABT project for the past 15 years, participating in multiple hearings, meetings and comment submission opportunities. The PABT project is a high priority for the long-distance scheduled service segment of the intercity bus industry as well as the daily commuter bus segment. We believe that this project could also fulfill an important role as a solution to the bus parking deficit that currently exists in downtown New York City and could be an additional solution to congestion mitigation in serving as a nexus point for intermodal transportation for interstate and intercity visitors to the City. We support ABA members' interest, including the current tenants, in modernizing and expanding the PABT. We wish that there was more mention and emphasis on the *intermodal connections in close proximity to the PABT in the DEIS*, including connections between rail, transit, intercity bus, taxis, ride-share, and others forms of surface transport. The facilitation of intermodal connections between these various modes must be a priority of any modernization project. ABA is proud to continue to participate in this environmental review process, strongly voicing the need for intercity bus operations, including parking, to remain robust and fully integrated in the facility as part of the final Project.

Initially, we commend the FTA and the leadership for the City of New York and New York State for coming together and securing committed funding² to complete this project as proposed. This action highlights the commitment to following through on this process, ensuring public feedback and stakeholder input are validly considered and incorporated into the process. Because the PABT plays such an important role in the national transportation network, even beyond its local importance to the New York and Tri-state area, it is critical for the development of this project to account for the needs of a multitude of interests, not only in terms of transportation services, but also in terms of environmental sustainability and supporting equitable access for rural, underprivileged and minority communities. With these interests and goals in mind, and along with information provided by ABA in prior comment submissions in this matter (including our testimony on Feb. 20), we offer the following additional comments and request the project sponsors to reconsider a few items as they move forward with the development of the new terminal, including the availability of increased motorcoach parking for commuter buses and charter buses, considerations for the ramp design and connections to the Lincoln Tunnel, as well as the inaccuracy of projections accommodating future growth and expansion of intercity bus providers.

A. CAPACITY

Although ABA is pleased FTA and the project sponsors developed a concept that includes motorcoach parking or layover, termed "storage" in the proposal, we do not think that it maximizes the potential benefits that a reconfiguring of this plan could offer to PABT and to the overall New York City congestion mitigation efforts. With more than 300 spaces planned to be available for parking in the DEIS, just making a small fraction of the total with 30-50 of those spaces available for metered or timed motorcoach parking by charter buses or shuttle buses looking to layover while in

² <https://newyorkyimby.com/2024/03/funding-approved-for-new-port-authority-bus-terminal-in-midtown-manchattan.html>

the City. PABT already has a parking contractor and they could expand their role to include motorcoach parking. We have seen successful implementation of this model in Washington, DC with its Union Station and in Boston, MA with its South Station. Incorporating paid motorcoach parking, will make the PABT the motorcoach destination point and will allow for better incorporation by visitors to the Metropolitan Transit Authority's system as well as other city services. Union Station in Washington DC for example enjoys more than \$35 million a year in revenue from bus station visitors. While motorcoaches are a congestion mitigation solution, by taking up to 50 cars off the road with each bus load of passengers, giving them a location to park, rather than forcing them to circulate the city streets while waiting for groups or for the very limited layover spots to open up would improve traffic conditions as well as improve roadway safety.

While we appreciate the consideration for motorcoach parking and layover availability, we believe that the project sponsors only considered it within their current operational context, rather than what would serve the best interests and needs of the local community and the bus industry as a whole.

Additionally, we note the DEIS does not take into account the lack of motorcoach parking inventory elsewhere in the Manhattan downtown core, which increases the reliance and need for bus/motorcoach parking at Port Authority. More than 1,000 private buses pass through New York City on a daily basis in a variety of operational pursuits. This number increases to over 2,000 buses per day during the peak tourism season. Yet, over time the City's motorcoach parking inventory has declined from a high of several hundred bus parking spaces throughout the city to now less than 50³. While a few metered parking spaces have been added in recent years, the motorcoach parking inventory has decreased overall since 2016, and free parking has largely been eliminated. Further, less than half of this current inventory is close to the tourism nexus. Because bus/motorcoach parking demand is at a premium, locations like PABT are essential to ensuring buses continue to visit. New York City needs safe places for buses to park and drivers need time to rest, in-line with the U.S. Department of Transportation's hours of service requirements. PABT is perfectly positioned to fill this need. We believe a dynamic capacity management system at PABT, could be successfully implemented as a solution to the long-term problem of accessible, reservable parking for buses/motorcoaches operating in the downtown core. The current parking contractor already has experience with that with cars at the PABT, hopefully this experience and technology could be applied to motorcoach parking. However, for any parking initiative to be successful it must begin with a sufficient number of parking slips to manage appropriately.

Based on current operations and projections from publicly available data, we believe the DEIS does not provide sufficient parking facilities for bus/motorcoach needs serving the city, taking into account both scheduled and non-scheduled, public and private bus/motorcoach operations. ABA urges the sponsors to reconsider and seek to provide adequate and universal motorcoach parking.

B. DESIGN

We were very encouraged to hear of the ramp design planned for direct connections to the Lincoln Tunnel. Having a direct connection to the tunnel will decrease traffic congestion and expedite motorcoach access to the PABT. We also were encouraged to hear about the ramp design within the terminal, allowing motorcoaches enough space to bypass vehicles blocking the pathway or during unexpected breakdown situations.

³ <https://www.nyc.gov/html/dot/downloads/pdf/buslayoverloc.pdf>

However, we do have some questions about ensuring there is enough visibility and that the ramps are not overly spiraled as were seemingly described during the public hearings. There can be unexpected consequences from a tightly spiraled ramp design, such as limited visibility depending on time of day from the rising or setting sunlight or the glare of headlights from oncoming vehicles, increased queuing due to slower operating speeds and tighter turning radius or forced congestion due capacity limits of the parking/storage facility. We are also concerned about the access points from the ramps to the various levels and whether the turning radius will be gentle enough to allow for easy traffic navigation as well as visibility of vehicles entering or exiting the ramp system from the bus slip or gate areas. We would like to echo the comments of other commentators with concern about the efficiency of housing the parking or staging facility 8 stories above the terminal gate facility and how long it might take to traverse those distances. As mentioned above, the hours of service are an important safety and operational aspect in motorcoach and intercity bus operations. If it takes 30 minutes to an hour to traverse the structure from the parking location to the passenger pick up area, that will have to be considered within the context of the hours of service and may impact parking usage, staffing as well as the operational service area of some companies. There was no specific mention of estimated travel time, which could figure into the environmental as well as sound pollution estimates, which several commentators brought forward during the public hearings.

Further, with an emerging interest in zero emissions commercial vehicles and efforts to transition commercial fleet operations on an unprecedented timeline, we do not see similar reflections or acknowledgement of these types of operations being integrated into the Project. We strongly recommend the DEIS address the parking and charging of ZEVs in this project. The current Administration recently published proposals encouraging adoption and incorporation of such technology into commercial fleet operations by 2040 if not earlier (EPA-HQ-OAR-2022-0985 – Greenhouse Gas Emissions Standards for Heavy-Duty Vehicles—Phase 3). These vehicles are currently available for commercial purchase and are being steadily incorporated in an increasing number of fleet operations.

Every motorcoach visiting PABT contributes to the goal of improving the environment, whether by taking cars off the road and reducing congestion, or by improved air quality. ABA believes the DEIS needs to take these positive benefits of motorcoach travel into account and highlight the environmental impact motorcoaches play in the final EIS as well as via parking solutions.

C. OPERATIONAL PROJECTIONS

Motorcoaches and intercity fixed route transportation have a place at the PABT. They serve an important role in providing intercity and interstate transportation to the resident of and visitors to New York City, one of the most important transportation hubs in the United States. Often times, those passengers come from rural or disadvantaged communities. One of the recent trends that has caught on with many of those economically diverse communities is the use of curbside intercity bus operations.

New York City has been at the front edge of this curbside bus phenomenon and developed its own intercity bus stop permit (<https://portal.311.nyc.gov/article/?kanumber=KA-02822>). Today, there are more than 700 permitted stops in New York City, representing over 40 different operators. However, while it was mentioned in the DEIS that curbside intercity operators would be encouraged to move into the redesigned PABT, there was no accounting for current curbside intercity bus operations nor calculation of future growth for intercity bus service. In some markets we see 5-10 new intercity

curbside operators added each year. Since the end of the pandemic, we are seeing similar growth in the intercity bus industry as operations and ridership return to pre-pandemic levels and are beginning to exceed them, but we did not note such similar growth projections in the DEIS. ***We believe that a survey of permitted curbside spots over time could be a key indicator for future growth (if there is opportunity for expansion) at new PABT facilities.***

An updated annual study by DePaul's Chaddick Institute⁴ of intercity bus operations chronicles a significantly higher percentage of annual passenger growth in the fixed route intercity segment than that cited in the DEIS. The DEIS projects ridership growth almost exclusively in the commuter bus and transit sector. We think an assessment of intercity and curbside usage should be considered for the redesign project as we do not think the projected design of the new PABT will have enough bus slips to accommodate current operations and will fall far short of the needs necessitated by future ridership growth and additional entrants to the intercity and commuter bus markets.

In closing, we have high hopes for a redesigned PABT and would like it to serve as the crown jewel in facilitating future motorcoach passenger growth (as highlighted in the National Travel and Tourism Infrastructure Strategic Plan 2020-2024) and promoting intermodalism as well as public-private partnership. We do believe that the Project currently relies on bad data, ignores current growth trends, minimizes consideration of the environmental and economic benefits that the motorcoach industry provides, and potentially limits equitable parking access to all populations. **The ABA supports a redevelopment of the Port Authority Bus Terminal, but with some additional changes and considerations.**

We appreciate your willingness to listen to public comment and work with your existing tenants to craft a design plan that is workable for current operations and hope that you will continue to listen to help shape operations in the future, 2040 and beyond. We believe that this is the most successful avenue to make sure that future growth is considered for all of our passengers including those who view the motorcoach as the only affordable and environmentally responsible way to travel.

The bus industry appreciates your interest in continuing to provide intermodal opportunities for the entire passenger transportation industry, but we hope that you won't forget the charter and tour bus segment in the PABT redevelopment plan. Thank you for the opportunity to provide comment, and for your partnership and engagement throughout this process.

Sincerely,



Brandon Buchanan
Director of Regulatory Affairs

⁴ Schweiterman, Joseph. (2024). "[Back on the Bus: 2024 Outlook for the Intercity Bus Industry.](https://las.depaul.edu/centers-and-institutes/Documents/2024%20-2023.pdf)" February 6, 2024. Chaddick Institute. <https://las.depaul.edu/centers-and-institutes/Documents/2024%20-2023.pdf>