TIMES SQUARE ALLIANCE TESTIMONY ON PROPOSED RULE CHANGE

Good afternoon. Thank you for the opportunity to testify on today’s proposed rule change on behalf of the Times Square Alliance.

As the business improvement district for Times Square, we understand the essential role tourism plays in our city’s economy, generating critical economic growth and building a positive image for New York City throughout the world. Tour buses are one of many ways for visitors to experience the city’s neighborhoods, ‘hopping off’ to spend money at local businesses or to take in the attractions the city has to offer.

However, we also understand the adverse impact of arbitrarily placing these ‘hop-on, hop-off’ stops, where buses often dwell for lengthy periods of time and cause significant vehicular and pedestrian congestion on surrounding streets and sidewalks. This congestion is created by both the large volume of stops, of which there are 26 in the Times Square area alone, and the poor placement of stops at points where sidewalk and roadbed space are already under the strain of myriad competing uses.

The proposed rule change does not address what we feel is the most important issue – not so much how the existing stops are allocated, but rather how the locations themselves are chosen, now and in the future. The key issue is where DOT will actually place bus stops now and in the future and how many total stops will be created, all based on factual analysis of the pedestrian and vehicular patterns in the affected neighborhoods, at the very least in neighborhoods with a disproportionate number of stops, like Times Square. In that context, we believe a more effective reform would be to temporarily delay the allotment of the 50 bus stops under consideration until a comprehensive study on the placement of these stops can be conducted that takes into account specific, neighborhood-based facts and conditions.
Linked to this is the need for rule-making that makes clear what the criteria are for placing stops. The process is unacceptably opaque. It has been stated that there are criteria, but they have not been shared. Nor is an explanation ever given of why a given stop is chosen or denied. This is unacceptable and the root cause of so many of the problems and tensions that entities in Times Square have with hop-on busses, who, after all, are just trying to run a business themselves. Clarity and criteria and communication will be better for all involved.

By way of example of the kind of factual analysis that might be useful: A recent report by Philip Habib & Associates demonstrates the impact of three Times Square tour bus stops on area streets and sidewalks. For instance, the average dwell time for tour buses using a stop at the northeast corner of W. 42nd Street between 7th & 8th Avenues, a major crosstown thoroughfare, ranged from a lengthy 14 minutes at midday on a weekday to as high as 46 minutes on Saturday evening. The stop with the shortest dwell time, located on the major artery of 7th Avenue at 47th Street, had busses idling for an average of 11 minutes. These are minutes that a stationary, double-decker tour bus spent in a precious lane of traffic on some of the city’s busiest streets, at a time when vehicular traffic in Times Square and the city in general has slowed.

In addition, these poorly placed stops negatively impact the safety & freedom of movement of Times Square’s pedestrians. The same PHA study considered the impact that queuing at the stops had on the ‘level of service’ that the surrounding sidewalks provide. The sidewalk at the least congested stop received a ‘C’ level of service, indicating ‘restricted but fluid movement.’ The three stops together collectively received a grade ‘E’ or ‘F’ at more than half the times studied, indicating that pedestrian movement was ‘severely restricted’ or that ‘forward progress’ was possible ‘only by shuffling’ and that ‘no reverse movement was possible.’ On blocks with this level of service, such as W. 42nd St. between 7th & 8th Avenues, pedestrians can frequently be found walking in the road, navigating oncoming traffic at significant risk to their personal safety.
Photographic documentation of this problem, as well as the full study, are included as appendices to this testimony.

Given these concerning facts, we believe a more effective rule change would require the promulgation of objective, neighborhood-specific criteria to understand the impact of tour bus stops on pedestrian level of service and vehicular traffic flow. In the Times Square area, for instance, these criteria might include the impact on egress from Broadway theaters and entertainment venues at specific hours. Each neighborhood where these buses travel throughout the city surely has similar stakeholders with like concerns.

Thank you for the chance to testify today on the value of and need for establishing rational, transparent, fact-based criteria for siting bus stops as part of a regulatory approach for an important and valued component of the tourism economy in New York City.