

August 18, 2022

Ms. Stephanie Pollack
Acting Administrator/Deputy Administrator
Federal Highway Administration
1200 New Jersey Avenue, SE
Washington, D.C. 20590

Mr. Janno Lieber
Chairman and Chief Executive Officer
Metropolitan Transportation Authority
2 Broadway
New York, NY 10004

Ms. Marie Therese Dominguez
Commissioner
New York State Department of Transportation
50 Wolf Road, 6th Floor
Albany, NY 12232

Mr. Ydanis Rodriguez
Commissioner
New York City Department of Transportation
55 Water Street, 9th Floor
New York, NY 10041

RE: New York City Central Business District Tolling Program

Dear Ms. Pollack, Ms. Dominguez, Mr. Lieber and Mr. Rodriguez:

On or about August 11, 2022, the American Bus Association (ABA) and United Motorcoach Association (UMA) received notice that the Federal Highway Administration (FHWA), the New York State Department of Transportation (NYDOT), MTA Triborough Bridge and Tunnel Authority (MTA), and the New York City Department of Transportation (NYCDOT), (collectively the sponsors) released an environmental assessment (EA) of the proposed Central Business District Tolling Program (CBDTP), and is allowing a 30-day public review and comment period, as the next in the step in fulfilling an environmental review of the proposed federal action under the National Environmental Policy Act (NEPA). As part of this 30-day review period, the sponsors also plan to hold six virtual public hearings at the end of August. The ABA and UMA, along with the undersigned state and regional bus associations, respectfully request the sponsors of this action to extend the 30-day public review and comment period to 120 days, and include in this extension additional hearing dates.

The ABA and UMA are national trade organizations representing the interests of the private bus and motorcoach industry. Our respective association members engage in all aspects of bus and motorcoach travel, including commuter, scheduled service and charter operations. The ABA membership also includes hotels, convention and visitors' bureaus, attractions such as Broadway theatres, Times Square restaurants and other companies that look to attract and host guests who are passengers of the motorcoach, tour and travel industry. The undersigned state and regional bus associations represent hundreds of commuter and charter bus and motorcoach operators, at the state and local levels.

The motorcoach industry is a recognized, long standing partner in the effort to address surface traffic congestion in urban areas. Fundamentally, motorcoach and bus operations, both public and private, must be included in consideration of any proposed solution to manage the congestion challenge.

New York City is a national destination point for tourism and business. Commuter and scheduled bus operators from the entire New England region run service to the City on a daily basis, including from Pennsylvania, New Hampshire, and Massachusetts. Further, the New York City tourism industry is heavily dependent on charter bus operations bringing visitors from around the nation. Because public

engagement in this NEPA process was limited (see FHWA “NEPA Class of Action” letter, dated March 31, 2021), a broad section of the public stakeholder community was not aware of this on-going process, let alone the schedule or coordination plan for coordinating public engagement and comment, pursuant to the requirements of 23 U.S.C. 139.

The EA document is lengthy, 838 pages for the main document with an additional 3,044 pages in appendices. For proposed actions of this magnitude, it is not uncommon, and in fact routine, for the environmental process to provide at least a 120-day minimum comment period, to allow the public sufficient time to review the environmental document and provide thoughtful comment. The EA is expected to serve as the foundation for moving forward on a project intended to have a significant impact on major roadways in and around New England, and national tourism. It deserves thoughtful consideration, and should include sufficient and appropriate stakeholder input.

A 30-day public comment period on an extensive, complicated document, along with a hearing schedule, slated over a weekend at the end of the August, the height of vacation season, will not enable the sponsors to meet the FHWA directed goal of obtaining robust public input from all stakeholders, in compliance with NEPA and the requirements of 23 USC 139.

We respectfully request you extend the public comment and review period, and include in the extended period additional hearings to enable more comprehensive stakeholder input. Thank you for your consideration of this extension request.

Sincerely,

American Bus Association

United Motorcoach Association

Florida Motorcoach Association

Greater New Jersey Motorcoach Association

Maryland Motorcoach Association

Midwest Bus & Motorcoach Association

Minnesota Charter Bus Operators Association

Northwest Motorcoach Association

National Association of Motorcoach Operators

Pennsylvania Bus Association

Tennessee Motor Coach Association

Wisconsin Motorcoach Association

Cc: Richard J. Marquis
Division Administrator
Federal Highway Administration