



Woodhaven Residents' Block Association

Established 1972

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November 27, 2015

Nicole Garcia
Queens Borough Commissioner
New York City Department of Transportation
120-55 Queens Boulevard
Kew Gardens, NY 11424
VIA E-MAIL

Dear Commissioner Garcia,

The Woodhaven Residents' Block Association (WRBA) recognizes that inadequate public transportation options, traffic congestion, and safety along the Woodhaven Boulevard–Cross Bay Boulevard corridor are serious concerns that the Department of Transportation (DOT) can and should address. We have, however, been disappointed by the Select Bus Service (SBS) design concept that DOT has put forward for the corridor.

The WRBA writes to urge DOT to explore fully a specific alternative: **initiating express bus or Bus Rapid Transit (BRT) service along the defunct train tracks of the Rockaway Branch rail line, which runs along 98th Street in our neighborhood.** The Greater Woodhaven Development Corporation (GWDC), the Woodhaven Business Improvement District (BID), and multiple elected officials also support serious study of this idea, which we shall refer to as the “Busway.”

This letter will begin by providing some context. Then it will describe the proposal of a Busway along the dormant train tracks, which we hope DOT will study exhaustively as an alternative to the current SBS design concept. Next, it will lay out the WRBA's concerns regarding both the process and the substance of the SBS design concept. Finally, it will encourage DOT to correct its dismal track record in our area by taking community feedback more seriously, beginning now with this proposal.

CONTEXT

For years, debate has raged over whether and how to use the defunct Rockaway Branch rail line's tracks, which run along 98th Street in Woodhaven, often very close to residences and their backyards. The tracks cross Jamaica Avenue and Park Lane South at the Woodhaven-Richmond Hill border, and run past the Forest Park Co-ops and Victory Field.

The two leading proposals for the rail line are to return the tracks to use for an active train line, or to convert the route into a walkway and bike path dubbed The QueensWay. For over three

years, the WRBA's stance has been to support neither of those proposals¹—a position reached and reaffirmed after hosting two well-attended forums on the issue. The WRBA has maintained that leaving the abandoned rail line alone is the best way to satisfy the needs and desires of as many Woodhaven residents as possible. The WRBA has also called on the City of New York, which owns the land, to take responsibility for maintaining it after years of neglect.

In light of the possibility of SBS along Woodhaven Boulevard and the significant contentiousness surrounding it, the WRBA has recently dedicated substantial time at several of its town halls to discuss the topic.

On April 18, 2015, Assemblyman Mike Miller, who represents all of Woodhaven, mentioned at a WRBA town hall the possibility of running bus service along the inactive railroad tracks instead of on Woodhaven Boulevard. The idea was well-received, but there was minimal discussion of it. Assemblyman Miller reiterated the suggestion that evening on a local radio show.² On November 21, 2015, Assemblyman Miller again advanced the idea at a WRBA town hall. This time, there was robust discussion, with almost every attendee in favor of the option in lieu of SBS.³

There has also been recent support from other quarters. For example, Senator Joe Addabbo expressed interest in exploring the possibility of utilizing the dormant rail for bus service, and Assemblyman Phil Goldfeder—one of the leading proponents of reactivating the tracks for train use—has also said he would support the idea, mentioning that he has discussed it with DOT Commissioner Polly Trottenberg.⁴ In addition, the GWDC and Woodhaven BID strongly support serious examination of the proposal as an alternative to SBS.

Based on this support, the WRBA urges DOT to conduct a full study of the possibility of a Busway along the defunct train tracks, and to issue a report with its findings, before proceeding with any form of Select Bus Service or redesign of the Woodhaven Boulevard–Cross Bay Boulevard corridor.

¹ WRBA, “WRBA Expresses Its View on Rail Line,” Oct. 15, 2012, <http://news.woodhaven-nyc.org/2012/10/wrba-expresses-its-view-on-rail-line.html>.

² Project Woodhaven, Radio Free Woodhaven, April 18, 2015, <http://www.blogtalkradio.com/project-woodhaven/2015/04/18/radio-free-woodhaven>.

³ Anthony O'Reilly, “WRBA says yes to buses on rail line,” Queens Chronicle, Nov. 25, 2015, http://www.qchron.com/editions/south/wrba-says-yes-to-buses-on-rail-line/article_4962e1b0-3b8c-558d-9244-0741377e962c.html; Gabriel Rom, “Miller proposes buses on defunct Rockaway line; SBS postponed until 2017,” Times Ledger, Nov. 25, 2015, http://www.timesledger.com/stories/2015/48/woodhaventrans_2015_11_27_q.html; Kelly Marie Mancuso, “Woodhaven residents enjoy small victory in SBS battle as DOT talks continue,” Queens Courier, Nov. 25, 2015, <http://qns.com/story/2015/11/24/woodhaven-residents-enjoy-small-victory-in-sbs-battle-as-dot-talks-continue/>; Michael V. Cusenza, “Woodhaven Civic Discusses ‘Outside-the-Box’ Select Bus Service Idea,” The Forum, Nov. 24, 2015, <http://theforumnewsgroup.com/2015/11/24/woodhaven-civic-discusses-outside-the-box-select-bus-service-idea/>.

⁴ O'Reilly, “WRBA says yes to buses on rail line,” Queens Chronicle, Nov. 25, 2015, http://www.qchron.com/editions/south/wrba-says-yes-to-buses-on-rail-line/article_4962e1b0-3b8c-558d-9244-0741377e962c.html.

GIVING SERIOUS CONSIDERATION TO A BUSWAY

As we acknowledged at the beginning of this letter, improvements are much-needed along the Boulevard. The Busway is a way to achieve these improvements without incurring the drawbacks of SBS described below. With SBS, DOT has been pushing a zero-sum proposition: a supposed improvement for bus riders at the expense of auto drivers, local businesses, and residents adversely affected by the altered traffic flows. The Busway seems to be a different type of proposition: a win-win that has the potential to improve bus service without disadvantaging other vehicles.

Because the Busway's route is largely parallel to Woodhaven and Cross Bay Boulevards, it would transport passengers over much of the same stretch as SBS. And because the right of way is close to the Boulevard—typically between two and six blocks away—it would be accessible to virtually all current and prospective riders of buses along the Boulevard.

In addition, the Busway would ensure that the right of way would be used in the manner least intrusive to residents whose properties abut the tracks. A train would be far louder than a bus (as the thousands of Woodhaven residents who live within earshot of both buses and trains can tell you) and would result in much more disruptive vibrations than a bus. Additionally, because buses weigh less than trains, they would require less significant embankments than rail service would, which might also allow the Busway to be set farther back away from nearby residences. Another benefit of the weight differential is that while trains will likely require complete replacement of the right of way's extant bridges (a point made to the WRBA by the late John Rozankowski, a rail reactivation advocate), buses might necessitate only repairs and reinforcement to those bridges.

A Busway would do more to preserve the privacy of nearby residences than would converting the right of way into a park. Because it would be off-limits to pedestrians and hazardous for them to walk along, the Busway would be less likely to attract would-be criminals than would a park. (Forest Park has already proved difficult to patrol without adding miles of parkland to it.) The Busway would be fully usable at night and in cold weather, which a park largely would not. The Busway would be easier to plow than would the proposed jogging path, so it could be used year-round.

Currently, the right of way has been badly neglected because the City of New York has failed to fulfill its responsibility to maintain its property. The existence of a Busway would also force a government agency to take responsibility for the property—to clean it up and maintain it properly. This would make the right of way safer and less likely to attract vermin or illegal activities.

Implementation of a Busway would be easier and less expensive than reactivation of a railroad. Various rail reactivation studies have estimated costs ranging (in 2015 dollars) from \$600 million to \$2.78 billion.⁵ (Goldfeder's estimate is \$700 million.)⁶ Commissioner Trottenberg's

⁵ Queens College Urban Studies Department, "A Community Impact Study of Proposed Uses of the Rockaway Beach Branch Right of Way," report prepared for Assemblyman Goldfeder, Nov. 10, 2014, pp. 20–26, <https://www.dropbox.com/s/kus9r9vq2l4v7bi/Rockaway%20Beach%20Branch%20Community%20Impact%20Stud>

estimate for SBS, in contrast, was \$200 million.⁷ A Busway would likely fall somewhere in between. A 9.4-mile busway in Connecticut was recently pegged at \$567 million.⁸ The relative merits of buses versus trains are hotly contested, but there is evidence that busways are both more cost-effective and more efficient for passengers than streetcars, light rail, or heavy rail.⁹ And Joan Byron of the Pratt Center said of returning the right of way to rail use, “It’s hard to see it making sense to revive it as a LIRR branch.... The subway system is just slammed. The only way to increase capacity is to look at how we can improve the performance of the bus system.”¹⁰

A Busway is also a winner when stacked up against classic SBS. Consider this description of why New York City’s SBS has failed to live up to the standards of BRT elsewhere: “It has no truly separated bus lanes, or elevated boarding platforms. It has off-board fare collection in places, but not universally. Its ‘dedicated’ bus lanes are only dedicated in theory, demarcated by a frequently ignored terra-cotta-colored paint. Other vehicles routinely infringe upon them, and when those vehicles are making right turns, they actually have to.”¹¹ The Busway would have all of the critical features identified by experts and none of the shortcomings.

On the Busway, bus drivers would not have to contend with any other traffic. They would not need to wait for traffic signals or receive traffic signal priority. They could maintain a high, safe rate of speed, knowing that they will never reach a cross street, or a crosswalk, or a red light, or pedestrians, or other vehicles. The stations for passengers will be out of harm’s way, far from Woodhaven and Cross Bay Boulevards and requiring no crossing of any lanes of traffic.

It is also worth noting that in emergencies, the Busway might provide an additional evacuation route or right of way for emergency vehicles. This is a non-trivial concern, as our thousands of neighbors affected by Hurricane Sandy can confirm.

Busways might be somewhat unusual in New York City, but they are not new to other cities. Boston, for example, has its Silver Line run for long stretches along a dedicated busway, during

[y.pdf?dl=0](#); Michael V. Cusenza, “State Grant Should Fund Rockaway Rail Line Study: Goldfeder,” The Forum, July 29, 2015, <http://theforumnewsgroup.com/2015/07/29/state-grant-should-fund-rockaway-rail-line-study-goldfeder/>;

⁶ Anthony O’Reilly, “Rockaway Branch rail would help more than 500,000 per day: study,” Queens Chronicle, Nov. 10, 2014, http://www.qchron.com/editions/rockaway-branch-rail-would-help-more-than-per-day-study/article_d4b1d4ea-6906-11e4-a9c3-23dc76990804.html.

⁷ Pete Donohue, “Ambitious \$200 million, 14-mile ‘super’ bus route unveiled in Queens, Woodhaven Blvd.,” NY Daily News, March 24, 2015, <http://www.nydailynews.com/new-york/ambitious-200-million-14-mile-bus-route-unveiled-queens-article-1.2160788>.

⁸ Heather Brandon & Ryan King, “Hartford–New Britain Busway Launches, Seeking to Nudge Drivers Toward Transit,” WNPR, March 27, 2015, <http://wnpr.org/post/hartford-new-britain-busway-launches-seeking-nudge-drivers-toward-transit#stream/0>.

⁹ See, e.g., Randal O’Toole, “The Worst of Both: The Rise of High-Cost, Low-Capacity Rail Transit,” Cato Institute Policy Analysis, June 3, 2014, http://object.cato.org/sites/cato.org/files/pubs/pdf/pa750_web.pdf; Josh Barro, “To Save Money on Building Rail, Spend Money on Marketing Buses,” NY Times Upshot, Feb. 10, 2015, <http://www.nytimes.com/2015/02/10/business/to-save-on-rail-lines-market-the-bus-line.html>.

¹⁰ Eric Jankiewicz, “Express bus foes want ’50s train back,” Times Ledger, April 23, 2015, http://www.timesledger.com/stories/2015/17/antisbsrally_tl_2015_04_24_q.html.

¹¹ Dana Rubinstein, “Why New York City has a second-tier bus system,” Capital New York, Nov. 20, 2012, <http://www.capitalnewyork.com/article/politics/2012/11/6620008/why-new-york-city-has-second-tier-bus-system?page=all>.

which it is consistently smooth sailing for the unimpeded buses. Los Angeles, Miami, and Pittsburgh also have busways,¹² as do cities in other countries.



*Boston Silver Line busway.
Photo: Massachusetts government blog*



*Busway in Virginia.
Photo: Alexandria, VA Transportation & Environmental Services*

We acknowledge that there are potential obstacles to the Busway: encroachments onto the right of way, questions about the proper routes for the buses before and after they reach the right of way, and determining how to prepare for the possibility of the occasional accident along the Busway. We are confident, however, that if DOT studies the matter seriously, and is as determined to make this idea succeed as it has been to push SBS through serious community opposition, the agency will be able to overcome these hurdles.

The WRBA maintains that SBS cannot be implemented until this promising alternative has been carefully examined. Just as some have called for train reactivation to be compared with SBS

¹² Eric Jaffe, "What We Can Learn From City Busways," Citylab, Dec. 20, 2011, <http://www.citylab.com/commute/2011/12/best-big-city-busways/764/>.

before SBS is implemented,¹³ we believe the public has the right to know how the Busway stacks up with SBS before SBS is begun.

ISSUES WITH THE SBS DESIGN CONCEPT

The WRBA has significant concerns about the process leading up to the current SBS design concept, and about the substance of the design concept.

Process Concerns

First, DOT's outreach presumed that SBS should be implemented, instead of first gauging the public's demand for SBS. There was no good-faith effort at the outset to ascertain whether the community actually supported SBS. Consider DOT's publicity for its workshop on June 25, 2014: "Join the New York City Department of Transportation and MTA Bus for an interactive design workshop where participants can get creative and share design ideas for implementing Select Bus Service on Woodhaven and Cross Bay Boulevards."¹⁴ Note that the public invitation was not to discuss *whether* SBS should be implemented, but rather *how* to implement it. This created the impression that SBS was a foregone conclusion, and that DOT was not interested in a true dialogue about the merits of SBS. Many residents concluded that DOT's outreach was pro forma instead of a genuine invitation to voice their concerns.

Second, when local residents provided feedback, they felt it was being ignored. Some residents opposed to SBS who attended DOT workshops reported being greeted with a general air of dismissiveness, rather than engagement. Later in the process, Kenichi Wilson, chairman of the transportation committee of Queens Community Board 9 (CB9), says he has asked DOT why they cannot do only a partial implementation of SBS, but has not received an answer. Other important questions have gone unanswered, as one of our Directors pointed out over a year ago.¹⁵ (Note that he also wrote at the time that SBS "is a good idea with the potential to dramatically improve the lives of many Queens residents—or significantly worsen them, depending on planning and execution." The WRBA has never been opposed to intelligent transit improvements.)

Third, even if the SBS workshops had been convened in a true spirit of gathering feedback, there were not enough of them held close to the residents who would be most affected and at times convenient for them to attend. By our count, there were only two workshops in Woodhaven: one on June 25, 2014, and another on April 16, 2015. This is grossly inadequate for changes as significant as what DOT has proposed for a vital thoroughfare. And holding Community

¹³ Allan Rosen & Brendan Read, "Select Bus Service will make Woodhaven worse," Queens Chronicle, Dec. 18, 2014, http://www.qchron.com/editions/south/select-bus-service-will-make-woodhaven-worse/article_90ca0c3a-243a-5fce-b8ed-73b67ce96450.html.

¹⁴ MTA & DOT, "Woodhaven Boulevard Select Bus Service Design Workshop," <https://www.facebook.com/232635164606/photos/a.248049229606.138612.232635164606/10152194513619607/>.

¹⁵ Vance B. Barbour, "Selecting Right Approach To Select Bus Service," Times Newsweekly, Sept. 18, 2014, http://www.timesnewsweekly.com/news/2014-09-18/Columns/News_From_The_Woodhaven_Residents_Block_Associatio.html.

Advisory Committee meetings on weekdays at 1 p.m. (as was done on February 24, 2014) or at 10 a.m. (as was done on March 26, 2015) or at 3 p.m. (as was done on June 24, 2015) struck some as a ploy to preclude working residents from attending.

Fourth, DOT never reached out to the WRBA regarding the workshop on June 25, 2014. Certainly, DOT personnel know how to reach us; as noted below, we have been in frequent contact with DOT. The decision not to provide advance notice to the WRBA about the workshop bespeaks either disrespect for local civic organizations' close relationships with their residents, or a lack of unfamiliarity with the area, or both. Fortunately, the communication failure did not prevent the WRBA from staying abreast of the events at the workshop, but it did raise questions about DOT's priorities and the robustness of its outreach. If we weren't told, what about the thousands of busy residents who can't follow all these developments as closely (even if their lives will be significantly affected)?

Fifth, people from outside the local community were disproportionately represented at the workshops. Many attendees came from well-funded, well-organized transit advocacy groups that are involved because they care first and foremost about the *cause*, not the *community*. The WRBA, in contrast, prioritizes what is best for the most Woodhaven residents, even if that means opposing the latest transit fad. To be sure, some of the transit advocate attendees were local residents, but even more of them were not. Transit advocate outsiders are certainly free to attend these workshops and express their perspectives, but DOT should not treat their feedback as reflective of the community's sentiment. DOT should not claim it has gathered "block-by-block feedback"¹⁶ when a disproportion of the attendees are largely unfamiliar with the blocks in question.

Sixth, surveys conducted by DOT were extremely inadequate. In its presentation for Community Advisory Committee Meeting #4, DOT boasted that it had "visited over 350 businesses along the corridor in Jan/Feb 2015."¹⁷ But as the accompanying map in that presentation indicates, none of the businesses off the corridor were surveyed—as if their input were irrelevant. That means none of the dozens of small businesses on Jamaica Avenue within a few blocks of Woodhaven Boulevard were asked, let alone the businesses along other major cross streets outside Woodhaven (e.g., 101st Avenue and Liberty Avenue). These businesses are obviously a relevant piece of any equation about traffic flow on the Boulevard. Similarly, it does not appear that DOT made an effort to survey the many thousands of drivers who travel the road every day and have been using the corridor for decades. Surely their input would be helpful in determining how removing a lane of traffic might affect traffic flow. In fact, the Queens Public Transit Committee asked DOT to "request[] a comparison of the positives and negatives for all users of the roadway, not only bus riders," and reportedly never received that information.¹⁸ DOT should

¹⁶ E-mail from Matt Kroneberger, DOT Community Outreach Coordinator, "Upcoming Design Workshops," April 2, 2015.

¹⁷ MTA & DOT, "Woodhaven / Cross Bay Boulevard (Q52/53) Community Advisory Committee Meeting #4," June 24, 2015, p. 16, <http://www.nyc.gov/html/brt/downloads/pdf/2015-06-24-brt-woodhaven-cac4-presentation.pdf>.

¹⁸ Allan Rosen & Brendan Read, "Select Bus Service will make Woodhaven worse," Queens Chronicle, Dec. 18, 2014, http://www.qchron.com/editions/south/select-bus-service-will-make-woodhaven-worse/article_90ca0c3a-243a-5fce-b8ed-73b67ce96450.html.

have made a serious effort to collect an accurate cross-section of opinions from all affected parties.

Seventh, when representatives from New York City Transit and DOT presented a design update to CB9 on June 9, 2015—the last formal update CB9 has received on SBS—they attempted to dodge questions from the Board members. Repeatedly, they said they did not want to take questions and told Board members that all the relevant information was online. Though the Board members insisted that some questions be asked, and the two presenters did end up answering a few of them, the agencies’ representatives did not create a dynamic of openness to feedback and inquiry—perhaps because they recognized that many Board members opposed the manifestly flawed design update that was just presented. Nonetheless, their approach at the meeting was in keeping with a woefully inadequate process that has culminated in the SBS design concept we have today.

Substantive Concerns

First, there is reason to believe that removing a lane of traffic from each side of the Boulevard would exacerbate congestion. For instance, the “improvements” already implemented on Woodhaven Boulevard as part of the Congested Corridors study have aggravated many residents, who attest to the fact that the changes have actually increased congestion.¹⁹ We eagerly await the results of the study of these changes. In the meantime, we believe it is important to use common sense: it stands to reason that fewer lanes will slow drivers’ commutes—especially when DOT is explicitly aiming to use SBS to slow non-bus traffic along the Boulevard.²⁰ As Allan Rosen, former Director of MTA/NYC Transit Bus Planning, wrote: “The facts are that the Woodhaven Cross Bay SBS is poorly planned and will be a colossal waste of money that will increase traffic congestion and will only minimally improve bus service. It may at times even slow down bus service.”²¹ DOT has not yet provided evidence that these intuitions are incorrect.

There is, however, solid evidence that those concerns are well-founded: soon after it was created, the B44 SBS route reportedly “snarled traffic on Nostrand Avenue, choking a key Brooklyn corridor and doubling travel times,” even though the DOT study predicted no adverse traffic

¹⁹ See, e.g., “Reducing lanes does not reduce traffic. Duh,” editorial, Queens Chronicle, Aug. 13, 2015, http://www.qchron.com/opinion/editorial/reducing-lanes-does-not-reduce-traffic-duh/article_0178351d-14c7-5626-bbe8-3726d24eb076.html.

²⁰ See, e.g., MTA & DOT, “Woodhaven/Cross Bay Boulevards Community Advisory Committee Select Bus Service Kickoff Meeting,” Feb. 24, 2014, p. 6, <http://www.nyc.gov/html/brt/downloads/pdf/2014-woodhaven-blvd-comm-advisory-kickoff-meeting-presentation.pdf> (“Issues: High traffic speeds causing unsafe conditions for drivers and pedestrians.”).

²¹ Allan Rosen, “The Commute: Let’s Have An Honest Discussion About Select Bus Service,” Sheepshead Bites, July 14, 2015, <http://www.sheepsheadbites.com/2015/07/the-commute-lets-have-an-honest-discussion-about-select-bus-service/>.

impact.²² Ridership dropped after SBS was implemented,²³ and Allan Rosen called it one of three SBS lines that were “definite failures.”²⁴

Some SBS supporters simply hate cars. The WRBA believes that cars are here to stay, and that DOT should seek solutions that are good for drivers and bus passengers alike—such as the solution we offer above. It would be unfair to implement a plan that increases bus ridership primarily by making life unbearable for auto drivers.

Second, preventing left turns from Woodhaven Boulevard onto Jamaica Avenue and other major cross streets will be a major inconvenience for visitors and residents, as most people who drive to or from Woodhaven can tell you. It will hurt our major commercial strip—which consists overwhelmingly of small and family-owned businesses—by making it significantly less convenient and more time-consuming for drivers to reach Jamaica Avenue from Woodhaven Boulevard. And it will likely shift traffic onto our residential side streets, because there will be no other way for autos—including commercial deliveries—to reach Jamaica Avenue. DOT has cited the incidence of accidents at this intersection as a reason to scrap the left turn.²⁵ But even some transit advocates acknowledge the probability that eliminating the left turn would displace commercial traffic onto residential streets, and that this would be a problematic outcome.²⁶ DOT has not provided the community with any projections about the number of accidents likely to occur on residential streets due to displaced traffic.

We understand that left-hand turns are generally more dangerous than right-hand turns.²⁷ But unlike at many intersections, the protected left-turn signal means that the turn from Woodhaven Boulevard onto Jamaica Avenue lacks one of the hallmarks of dangerous left-hand turns: “The turning driver has a green light right when pedestrians have the walk light.”²⁸ As Commissioner Trottenberg has said, “There’s no question, in cases where we can minimize left turns, or give vehicles their own turning phase, we want to try to do that.”²⁹ Fortunately, at this intersection, there is, as Commissioner Trottenberg called it, “a special turning lane and a special signal ... for left turns.”³⁰ In addition, drivers making left turns onto Jamaica Avenue will already have driven approximately 100 feet before they encounter a crosswalk traversing Jamaica Avenue.

²² Sonja Sharp, “Brooklyn’s New B44 Express Bus Causes Traffic Nightmare, Residents Say,” DNAINFO, Jan. 13, 2014, <http://www.dnainfo.com/new-york/20140113/crown-heights/brooklyns-new-b44-express-bus-causes-traffic-nightmare-residents-say>.

²³ MTA, “Annual Bus Ridership,” B44 2013-2014 Change, http://web.mta.info/nyct/facts/ridership/ridership_bus_annual.htm.

²⁴ Allan Rosen, “The Commute: We Now Have Definitive Proof Select Bus Service (SBS) Is A Failure—Part 2 of 2,” Sheepshead Bites, May 5, 2015, <http://www.sheepsheadbites.com/2015/05/the-commute-we-now-have-definitive-proof-select-bus-service-sbs-is-a-failure-part-2-of-2/>.

²⁵ Anthony O’Reilly, “No left turns onto Jamaica Avenue?,” Queens Chronicle, April 21, 2015, http://www.qchron.com/editions/south/no-left-turns-onto-jamaica-avenue/article_f9f7f908-8adf-5054-aa24-1b6366197e86.html.

²⁶ Christopher Barca, “SBS advocates defend the Woodhaven plan,” Queens Chronicle, May 28, 2015, http://www.qchron.com/editions/queenswide/sbs-advocates-defend-the-woodhaven-plan/article_b38ffd21-4947-58c6-bea6-72e0003279d8.html.

²⁷ DOT, “The New York City Pedestrian Safety Study & Action Plan,” Aug. 2010, p. 26, http://www.nyc.gov/html/dot/downloads/pdf/nyc_ped_safety_study_action_plan.pdf.

²⁸ Kate Hinds, “Why Left Turns Are So Deadly,” WNYC, <http://www.wnyc.org/story/left-turns/>.

²⁹ *Id.*

³⁰ *Id.*

Before eliminating the left-hand turn for purported safety reasons, consider the alternatives suggested by Maria Thomson, executive director of the GWDC and Woodhaven BID: install LED lighting to improve visibility under the elevated subway, allow pedestrians more time to cross, install countdown clocks for pedestrians crossing Jamaica Avenue at this intersection, and provide better signage to warn drivers of the upcoming left turns.³¹ To this we would add: more (i.e., any) enforcement to prevent pedestrians from crossing against the light; better signage to warn pedestrians; for pedestrians crossing Woodhaven Boulevard, starting the countdown clocks sooner to indicate more than the final 20 seconds of crossing time; removing illegally posted signs that regularly clutter this intersection and serve as distractions, but which often remain posted for months because of a lack of inter-agency cooperation;³² and improving drainage on the median so that pedestrians can comfortably wait on the island without standing in a large puddle of water or, in winter, on a treacherous sheet of ice.³³

Third, the design concept would require riders to wait for buses on a median in the middle of the Boulevard. This will be unsafe and inconvenient, especially in inclement weather. The Department of Sanitation's right-articulated snow plows will pile snow along the bus station. In order for the bus stations to be well-maintained, there would need to be trash receptacles on the median, which Department of Sanitation vehicles would need to service by stopping in the middle of the road. Pedestrians running to catch a bus at a median bus station are more likely to be struck by vehicles because they now need to cross traffic to get to the pick-up point. This is especially acute because currently, when there is cold or rainy weather, many riders wait inside adjacent businesses until the bus arrives. And if the median is widened to make the bus station safer and more comfortable, other medians and pedestrian islands will have to be narrower to conserve road space. That makes it likelier that vehicles using passing lanes will collide with lighting fixtures and trees—and maybe even waiting pedestrians—on those other medians.

Fourth, buses are likely to speed when they have a lane all to themselves. Already, we have seen that buses using the existing BRT lanes on Woodhaven Boulevard frequently exceed the speed limit.³⁴ Case in point: the dedicated bus lane and high speeds contributed to the accident in which a Resorts World Casino bus collapsed the side of a building at the corner of Woodhaven Boulevard and 63rd Avenue.³⁵ City buses can be very dangerous to pedestrians, as highlighted

³¹ Maria Thomson, "A threat to life in Woodhaven," *Leader/Observer*, Nov. 5, 2015, http://www.leaderobserver.com/view/full_story/26942859/article-A-threat-to-life-in-Woodhaven.

³² For more information about this problem, see Woodhaven Residents' Block Association, "A Report on the New York City Department of Sanitation's Performance on Addressing Illegal Postings," Oct. 17, 2014, <http://content.woodhaven-nyc.org/WRBAReportOnIllegalPostings.pdf>.

³³ See, e.g., these Tweets by Ed Wendell (@projwoodhaven) from February 8, 2014: <https://twitter.com/projwoodhaven/status/432192087748907008>; <https://twitter.com/projwoodhaven/status/432193061720838144>; <https://twitter.com/projwoodhaven/status/432192436480131072>; <https://twitter.com/projwoodhaven/status/432190335381299201>; <https://twitter.com/projwoodhaven/status/432195531629006848>; and <https://twitter.com/projwoodhaven/status/432194446415765504>.

³⁴ Jon Cronin, "Concerns Remain Over Woodhaven SBS Plans," *Queens Tribune*, Sept. 17, 2015, <http://queenstribune.com/concerns-remain-over-woodhaven-sbs-plans/>.

³⁵ Catherina Gioino, "Resorts World Bus Crash," *Queens Gazette*, Aug. 26, 2015, http://www.qgazette.com/news/2015-08-26/Front_Page/Resorts_World_Bus_Crash.html.

by the recent spate of deadly bus accidents. On November 1, an MTA bus fatally struck a pedestrian in Forest Hills.³⁶ On November 3, a pedestrian was grotesquely killed in a hit-and-run by an MTA bus in Brooklyn.³⁷ Just the other day, a pedestrian was killed by an express MTA bus in Brooklyn.³⁸ Giving MTA buses their own lane—at the expense of other drivers—is no guarantee of improved safety.

Fifth, there are open questions about how SBS will affect local and other buses. The Q52, Q53, Q11, Q21 and QM15 all use this corridor. Will all buses use the SBS lane? If so, will buses picking up and discharging passengers slow down other buses behind them? Will SBS lead to a diminution of local service that costs commuters time by requiring them to walk to SBS stops?

CONCLUSION

DOT's interactions with the WRBA in recent years have not inspired confidence. From the ill-conceived (and ultimately abortive) effort to change the directions of two streets in our community,³⁹ to DOT's persistent failure to remedy its dangerously inadequate lighting situation in Forest Park,⁴⁰ to its years-long delays to install needed speed humps,⁴¹ the agency has done little to build bridges with the people of Woodhaven. DOT's activities nearby also provide scant comfort. From its misguided reconfiguration of Liberty Avenue in the name of reducing congestion⁴²—which it needed to undo less than two years later⁴³—to its unwise push for the

³⁶ Jamie Reysen, "Woman fatally struck by Q23 bus in Forest Hills: NYPD," *am New York*, Nov. 5, 2015, <http://www.amny.com/news/leyla-enukasvili-hit-killed-by-q23-bus-in-forest-hills-nypd-1.11061563>.

³⁷ Rocco Parascandola, Laura Bult, & Corky Siemaszko, "Bus driver mowed down grandmother, stopped, then hit the gas, prosecutor says as gruesome hit-run details emerge," *NY Daily News*, Nov. 4, 2015, <http://www.nydailynews.com/new-york/brooklyn-hit-run-bus-driver-3-prior-arrests-article-1.2423546>.

³⁸ Chris Sommerfeldt & Joseph Stepansky, "Woman struck, killed by MTA bus in Brooklyn: police," *NY Daily News*, Nov. 25, 2015, <http://www.nydailynews.com/new-york/brooklyn/woman-struck-killed-mta-bus-brooklyn-cops-article-1.2447101>.

³⁹ Anna Gustafson, "Residents slam traffic change plan at forum," *Queens Chronicle*, Feb. 9, 2012, http://www.qchron.com/editions/south/residents-slam-traffic-change-plan-at-forum/article_cb2687dc-4db5-55ab-b166-5534492e067f.html; Lisa A. Fraser, "Street changes voted down at CB9 meeting," *Leader/Observer*, March 16, 2012, http://www.leaderobserver.com/view/full_story/17912840/article-Street-changes-voted-down-at-CB9-meeting.

⁴⁰ Domenick Rafter, "The lights are still out in Forest Park," *Queens Chronicle*, Oct. 10, 2013, http://www.qchron.com/editions/south/the-lights-are-still-out-in-forest-park/article_ee825544-fd93-5835-9f63-94ca879ed713.html; Edward K. Wendell, "DOT's Failure in Forest Park," *Project Woodhaven*, Oct. 2013, <http://www.projectwoodhaven.com/2013/October/DOT-Fail.html>.

⁴¹ For example, residents are still awaiting a speed hump on 98th Street between Jamaica Avenue and Park Lane South. CB9 approved the speed hump in June 2012. Luis Gronda, "CB 9 Approves Speed Humps, Community Residence," *The Forum*, June 21, 2012, <http://theforumnewsgroup.com/2012/06/21/cb-9-approves-speed-humps-community-residence/>.

⁴² Jose Bayona, "Ozone Park shops suffer after traffic switch turns their street into a dead-zone," *NY Daily News*, July 25, 2011, <http://www.nydailynews.com/new-york/queens/ozone-park-shops-suffer-traffic-switch-turns-street-dead-zone-article-1.157652>.

⁴³ Steve Mosco, "Back to biz as usual on Liberty Ave: DOT," *Times Ledger*, May 5, 2012, http://www.timesledger.com/stories/2012/18/libertyavetwoway_fh_2012_05_03_q.html.

City Line pedestrian plaza,⁴⁴ DOT's involvement in the area has been long on errors and short on true collaboration with the community.

The WRBA states as emphatically as possible: implementing the current SBS design concept along the Woodhaven Boulevard–Cross Bay Boulevard corridor would be yet another in DOT's long track record of mistakes in our area. We exhort DOT not to commit this error.

There is an opportunity for the agency to turn a new leaf—to start doing a better job to consider the community's feedback. DOT can seize this opportunity by treating the Busway proposal, and the WRBA's feedback on SBS, with the utmost seriousness.

Sincerely,

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Assemblyman Michael Miller
Assemblyman Phillip Goldfeder
Council Member Eric Ulrich
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⁴⁴ Domenick Rafter, "DOT may change City Line pedestrian plaza," Queens Chronicle, Oct. 16, 2014, http://www.qchron.com/editions/south/dot-may-change-city-line-pedestrian-plaza/article_a5312f3e-e4c5-5337-a095-f84f91b40825.html.