

TRI-STATE TRANSPORTATION CAMPAIGN



August 31, 2006

Hon. Iris Weinshall
Commissioner, NYC Dept. of Transportation
New York City Department of Transportation
Room 1105 Attn: Truck Study
40 Worth Street
New York, NY 10013

Re: Truck Route Management and Community Impact Reduction Study Report

Dear Commissioner Weinshall:

Thank you for accepting responses to the NYC DOT Truck Route Management and Community Impact Reduction Study report.

Overall, we think the recommendations rely too heavily on truck signage and enforcement, and not enough on traffic calming techniques that encourage trucks to stay off of local, neighborhood streets. In the coming years, traffic calming must become one of the main tools that the NYC DOT uses to manage truck travel through the city.

The proposed signage program overhaul is an important first step in reducing trucks' impacts on communities, and we believe the positive signage program, at a modest cost of \$4 million, should be implemented immediately. However, the signage program's focus on positive signage, rather than both positive and negative signage, is a major flaw of this study. The argument that the presence of negative signs encourages truckers to use streets not signed is a poor one. The data in this report clearly shows that certain street segments near truck routes are overburdened with trucks and truck accidents. Positive signage alone will likely not do enough to change the behavior of truck drivers using these illegal routes.

We think the positive should be complemented by a negative signage program that protects dangerous and overburdened street segments near truck routes, many of which are detailed in a borough by borough basis in Technical Memorandum II – the study team suggests that the DOT consider more negative signage, but then sets up an overly bureaucratic process for the actual implementation of a negative sign. This process is unnecessary, and should be replaced by a process that makes it very simple and fast for communities to receive negative signs.

The establishment of an Office of Freight Mobility is a good step forward. However, we worry, given the vague responsibilities of the office outlined in Technical Memorandum IV (Page 24),

that this office will be yet another layer of bureaucracy, with little power to actually implement new plans, enforce new rules, and suggest legislation.

We also strongly agree with the study documents that moving larger vehicles onto highways and parkways is necessary as truck traffic continues to grow. We hope the DOT promptly begins opening certain interstates and parkways to truck traffic, and that it initiates a longer term engineering program that seeks to make other larger roadways safe for trucks.

The study says that truck activity in certain neighborhoods has decreased due to development and zoning changes that have made areas more residential, and less commercial and industrial. While this may be true, the city as whole is only anticipated to see more and more truck traffic in future years. Much of the truck traffic increase will be driven by larger global trade and economic forces, rather than localized changes in zoning codes. This will eventually put pressure on more streets in all five boroughs, and require stricter management of truck routes.

To deal with this projected increase, the city needs an overarching freight management plan that addresses broader issues like how to shift more freight onto more sustainable transport modes like rail and barge, how to complete engineering changes to certain parkways and other large roadways to accommodate truck traffic, and how to implement a broad-scale traffic calming program to protect local streets – all of which have been successful undertaken by other cities. New York City must start on these efforts immediately, and ensure that they move faster than the near decade long truck route management study. We recommend that the Office of Freight Mobility be established immediately to start work on these efforts.

We have responded in detail to the recommendations section of the Technical Memorandum I, II, III, and IV below.

Sincerely,

Teresa Toro
NYC Coordinator

Comments on Truck Route Management and Community Impact Reduction Study

Final Draft Technical Memorandum I - Traffic Policies and Regulations

Section 7, Recommendations

Routing

2. Establishment of an Office of Freight Mobility within the New York City Department of Transportation.

The creation of an Office of Freight Mobility is an excellent recommendation. However, the study team should offer more details about what level of responsibility this office will have. The city should grant this office broad authority, empowering it to develop recommendations for legislation and enforcement to city and state agencies. The most immediate priorities for the Office of Freight Mobility should be the development of a comprehensive citywide freight management policy, creation of a broad scale traffic calming plan to protect local streets, and a longer term study on how to move more trucks on parkways and other large roadways. Given the urgency of truck related issues citywide, we urge DOT to have this office up and running no later than January 2007.

3. Permit 53-foot long trailers with widths up to 102-inches on more Interstate highways in the City, with increased enforcement of 53-foot trailer travel on all other streets.

The Campaign applauds this recommendation; it makes sense to put large trucks on highways, thus reducing impacts on neighborhood streets. We urge DOT to modify highway exits and entrances where necessary to keep 53-foot trailers on designated routes and off of illegal, smaller roadways. We also note that this recommendation would particularly benefit the Air Cargo Industry, as truck access to John F. Kennedy Airport has been limited. DOT should implement this recommendation as soon as possible.

In the long term, we also hope the NYCDOT will consider reengineering other large roadways, like the Belt Parkway and the FDR, to make them able to accommodate large trucks.

4. Explore opportunities to permit courier vans and small delivery vehicles to use selected parkways.

The Campaign fully supports this recommendation, which benefits communities by relieving them of the burden of delivery vehicles, and benefits freight and courier industries by opening up more routes for travel. As New York's population grows, and the demand for goods and services increases, it is important that the impact from increased traffic volumes be minimized on residential communities. As we noted above, the NYCDOT should have a long term goal of moving even larger trucks onto certain parkways, and should commence a study of how to implement such a plan immediately.

6. Eliminate the Limited Restriction Zones in Manhattan.

The report cites the following reason for this recommendation: "Over the past twenty years, changing land uses, decline in businesses and industry and the expanded residential nature of many of these zones has distorted the boundaries for these limited restriction zones..." (Page 88)

Land uses have clearly changed in certain areas, but overall truck traffic in the city has increased, and will continue to increase. We ask that another look be taken at policies like this to protect residential neighborhoods from being overburdened with through-truck traffic.

7. Place time restrictions on the use of local truck route streets that traverse residential areas.

We support the implementation of off-peak travel restrictions on such streets, but the recommendation does not indicate how such closures will be achieved. We request more information regarding this recommendation.

8. Eliminate the discontinuities of designated truck routes as they cross between Boroughs.

We agree that routes should continue through boroughs.

Signage

9. Installation of truck route signing program.

These common-sense recommendations should be undertaken immediately by DOT. Still, the study relies too heavily on positive signage, and does not seem to include negative signage in the estimated sign program cost of \$4.13 million (Page 90). See further comments on Technical Memorandum 3, below.

11. Display truck route advisory information on Variable Message Signs (VMS) on expressways, bridge and tunnel crossings and major arterials.

This is an excellent common-sense recommendation that should be expanded to include travel alternatives during planned road repair and construction projects (Page 90).

12. Provide advance warning on height restrictions along truck routes.

We agree that DOT should provide consistent advance warning regarding such restrictions, but also take this opportunity to catalog those locations where height and weight limitations interfere with the ideal routing of trucks, particularly through-truck traffic. The Office of Freight Mobility should review this catalog to start long-term planning for reconstructing such locations to accept today's truck sizes. This will facilitate truck movement, particularly for through-truck traffic. (Page 91)

Policies and Regulations

13. Revise the format and structure of information on the truck related regulations including truck routes, weight and dimension restrictions.

This is a critical step towards moving more through-truck traffic onto more appropriate roadways and out of neighborhood streets. Additionally, the following recommendation should be realized immediately: "... the NYCDOT website should be modified to ensure that it is user-friendly and includes the following information [with specific recommendations regarding truck route maps]..." This website should be exhaustively advertised to trucking companies and in industry publications. (Page 91)

15. Improve contractor accountability in the posting and maintenance of truck signage along detour routes that are established for roadway reconstruction projects, as well as insuring that the signs are covered during non-detour time periods and removed once the roadway reconstruction is completed. In addition, the Department should work with contractors to ensure that all proposed detour routes take into account the movement of truck traffic, while mitigation impacts in residential neighborhoods. In addition, the Department would work to ensure that the specified routes to construction sites are followed to the extent possible.

"It is recommended that for major reconstruction projects where trucks are detoured off a major truck route for prolonged periods of time, the applicant/sponsoring agency before applying for a permit should demonstrate that the detour route can accommodate tractor trailers, large trucks and buses and address adequacy of all allowable trucks to negotiate turns at intersections. The applicant should also provide capacity analysis along the major intersections of the detour route. It is also recommended that improved enforcement be undertaken when there are substantial diversions on routes with high truck volumes to ensure compliance with posted signage.

"In addition, agencies should enhance their work with contractor on major projects to appropriately route traffic to and from a construction site in a manner which would minimize the effects on truck traffic on surrounding communities." (Page 93)

DOT is responsible for all street traffic management, so should be in charge of truck detours and management during construction. Agencies such as DEP are not, nor should they be, asked to manage traffic while they undertake major projects which involve street closings. Asking various agencies and applicants to develop and implement traffic mitigation will result in mixed results, and create a vacuum in terms of responsibility for regulation and oversight, with communities paying the price in the form of increased health and safety risks. Where major truck routes are involved, DOT should work with the Office of Freight Mobility to determine suitable alternatives.

16. Expand off-peak deliveries in the Central Business District (CBD) through a combination of incentives and curbside regulations.

Encouraging off-peak deliveries should be a priority; however, this should be planned as an enhancement to the recommendation regarding street closures for those local routes that currently see little truck traffic. With the implementation of off-peak deliveries, this might

change truck volumes on local routes during off-peak hours, and impacts on residents should be taken into consideration. (Page 94)

Enforcement Strategies

1. Establish truck route violations as a quality of life initiative to be monitored as part of NYPD TrafficStat.

Currently, truck traffic enforcement reporting varies greatly from precinct to precinct; we urge NYPD to develop a discrete TruckStat to help track truck violations, and make that data available to other city agencies such as DOT and City Planning, along with community boards, to assist them in future transportation and freight planning. (Page 94)

4. Set up a procedure for deploying personnel at high-complaint locations.

It is disturbing that there is currently no procedure in place, given that the multiple truck traffic “hot spots” throughout the city, many of which are clearly detailed in this report. It is unclear why the NYPD cannot simply deploy personnel to these locations now. Traffic enforcement officers are already stationed at many busy intersections. Educating traffic officers on truck rules and enabling them to give summonses for truck violations is a more efficient way to improve enforcement.

“It is recommended that efforts be made to track enforcement efforts and the number and type of summonses issued” sounds like some form of a TruckStat project, which we encourage. However, it is entirely unclear as to who would undertake “tracking” those enforcement efforts – will it be the Office of Freight Mobility? The NYPD Traffic Squad? Clarification is needed. (Page 95)

Overall, this section fails to suggest the use of technology in truck route enforcement. Currently, DOT is conducting a Weigh-in-Motion (WIM) pilot project in Brooklyn, at the behest of Assemblyman Joe Lentol. The use of proven technology such as WIM should be applied throughout the city, reducing the strain on NYPD resources. The Office of Freight Mobility should devise a Weigh-in-Motion implementation strategy including cost and time estimates, by the end of 2007.

Final Draft Technical Memorandum 2 – Truck Routing Analysis

Table 2-4: Top 20 Truck Accident Locations Citywide from 1999-2001

The analysis should include more specific recommendations. For example, are there “lessons learned” from the data? Has DOT studied the nature of these accidents? Did any involve red light running, speeding, etc.? Were pedestrians, cyclists or motorists killed or injured? Was public or private property damaged? What physical changes to the layouts of the intersections would reduce the number of accidents? (Page 14)

Also, if 18 intersections have experienced three or more accidents, it seems that these intersections must see immediate changes. (Page 71)

Table 4-2 shows a number of accidents occurring at intersections that are off the truck route network. These routes should have negative signage to discourage truckers from using them.

Overall, Technical Memorandum 2 recommends truck route signs to solve truck routing and traffic problems in neighborhoods. There is no implementation of traffic calming to make it more difficult for trucks to travel down small, off truck route, neighborhood streets, and very little in rerouting trucks to new roadways. Traffic calming must be considered along many of these roadways to protect neighborhoods.

Final Draft Technical Memorandum 3- Truck Signage Program

Overall, the signage program relies too heavily on positive signage. We think the \$4 million positive signage program is an important part of any truck route management plan and should be implemented immediately, but that is must be coupled with negative signage and other techniques like traffic calming to truly make a difference.

We agree with recommendations to upgrade signs and to new color and size, and create uniformity in the sign system. (Page 33)

“Buildings, utility poles, and tree placement may also impact spaces that occupy traffic signs and limit preferred sign placements. Therefore, at preferred truck route sign locations, it is recommended that signs be placed on the basis of engineering judgment and at standardized heights and configurations.” Here, the study seems to be saying “We’ll post signs uniformly and consistently except where we can’t.” This contradicts other statements in the document which bemoan the fact that truck route signage is currently too inconsistently and haphazardly installed, and undermines the stated goal of making signage standardized throughout the city. That said, we believe that signs placed in less desirable places are better than no signs at all, and suitability should not be the only factor. We do not believe that engineers are the best decision makers regarding the placement of signs that will be noticed and heeded by truck drivers; we believe that input from the trucking industry might be more useful regarding the placement of signage. (Page 33)

The report states that the DOT should consider negative signage but that “only major cross streets with high vehicle traffic” should have it. We believe that signs prohibiting trucks should be placed on more than major crossroads. The point of the study is to keep trucks off of local streets. This will require truck prohibition signs on more than major crossroads. Negative signage is absolutely required along certain routes (especially the many off routes street segments that experience truck accidents, listed in Tables 4-2, for example, in the Technical Memorandum 2.

The study recommends that DOT revisit its rules for applying negative, trucks-prohibited signs, but sets up an overly bureaucratic process for actually erecting a sign. It states, “central to this process are expanded investigation procedures for establishing the need and applicability of the requested signage, including consideration of positive, reinforcing signage opportunities to properly delineate the route system,” and suggest the Office of Freight Mobility work with the

Borough Commissioner and engineers to figure out where to place signs. We believe that if community needs a negative sign on certain roads, they should receive one (Page 48-50).

Furthermore, the communities that have waited for years for this study to be finished are expecting relief from this truck program. Many have voiced support for negative signage on their local roadways. The study's assertion that negative signage on certain roadways encourages trucks to use any roadway that is not signed, is a poor one that DOT will have a hard time justifying to local residents dealing with noise and safety implications of truck traffic.

On Page 54 and in Appendix A, it is unclear whether the \$4.13 million figure for the signage program includes any negative "trucks prohibited" signs.

Final Draft Technical Memorandum IV- Education

This section contains many common sense recommendations that should be implemented immediately.

The responsibilities of the Office of Freight Mobility are vague, and indicate that this Office may simply create another layer of bureaucracy. Terms like "foster partnerships," "increase dialogue between agencies," and "assist in creation" do not bode well for the effectiveness of this agency. We think this agency should have some real power, lead the development of a freight policy plan and coordinate the implementation broad traffic calming infrastructure.

We strongly support the creation of a new truck map and the update of the DOT's truck section of its website, and look forward to seeing these upgrades by Fall of 2006. (Page 25)

The creation of better tracking of truck complaints to 311 is excellent and we hope information obtained from 311 calls will be available to the public and community boards. (Page 32)

The placards (Figure 3-4) should be created and handed out to NYPD immediately.