



July 17, 2023

Julie Abraham
Director
Office of International Transportation and Trade
U.S. Department of Transportation
1200 New Jersey Avenue, SE, Room W88-303
Washington, D.C. 20590

**RE: [DOT-OST-2023-0080] – National Travel and Tourism Infrastructure Strategic Plan;
Request for Comment**

Dear Director Abraham:

The American Bus Association (ABA) appreciates the opportunity to provide input to assist the U.S. Department of Transportation (DOT) in updating the National Travel and Tourism Infrastructure Strategic Plan (NTTISP or Plan), initially released in 2021, per the Federal Register notice published on June 2, 2023, [Docket No: DOT-OST-2023-0080] (Notice). As a member of DOT's original National Advisory Committee on Travel and Tourism Infrastructure, ABA's President and CEO Peter Pantuso was involved in the drafting of the initial Plan, and it is only fitting for ABA to remain engaged in the planning effort.

The ABA is a trade association representing the private intercity bus/motorcoach industry along with group tour and travel industry. 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 operators and travel planning companies, as well as convention and visitors' bureaus (CVBs), destinations and attractions. The ABA and its members play a vital role in promoting travel and tourism throughout North America as well as encouraging and facilitating travel to many of our nation's most iconic destinations and many of the historic, family-owned businesses that give America its charm.

As with the entire travel and tour industry, as well as related businesses who depend on this industry, ABA members were severely impacted by the COVID-19 pandemic and continue to struggle with recovery even to this day. For this reason, ABA appreciates Congress's recognition of the devastating effect the pandemic had on travel and tourism, and its many efforts to revive

the industry and bolster the nation's travel and tourism economy. Specifically, we appreciate the Congressional directive to update the Plan by including "policy recommendations and infrastructure investments across all modes of transportation to revive the travel and tourism industry".

In support of this goal, and as part of the government-wide effort led by the Department of Commerce's Tourism Policy Council, ABA offers the following input or comments in response to the specific questions posed in the Notice that we are in position to answer.

1. How Can Transportation Infrastructure Better Facilitate Long-Distance Travel and Tourism?

The ABA has no issue with how the DOT defines long-distance travel and tourism. As to opportunities or barriers to supporting such travel, motorcoach access to other modal facilities remains one of the greatest barriers. This issue is particularly frustrating in terms of motorcoach access to modal transportation facilities funded through public dollars, such as Amtrak stations, public transit stations, and airport terminals. Obstacles to providing seamless intermodal connections frustrates the goal of facilitating long-distance travel and tourism and can also contribute to congestion and environmental concerns. Even though statutory language exists to address some of these access issues, it is rarely, if ever, enforced. Instead, motorcoach operators continually face obstacles to accessing other transportation modal facilities, either outright or through constructive means.

For example, airport facilities are notorious for setting up obstacles to limit or prevent motorcoaches accessing terminal facilities. These obstacles have taken the form of overly burdensome fees, restrictions on where passengers can be dropped off (i.e. far from the terminal), unreasonable penalties for idling (not allowing sufficient time for passengers with luggage to disembark), non-safety related inspections, and other disincentives. The challenge with airport terminal access is the competing incentive for terminals to promote money-generating concessions, such as parking or rental car concessions, often at the expense of access for alternate modal transportation and climate goals.

Access is frequently restricted at public transit facilities or Amtrak stations. It is common practice for public transit operators to adopt policies restricting or prohibiting access to publicly funded rail stations, or high-occupancy vehicle lanes under the auspices of "safety" or some other fabricated excuse. Similarly, motorcoach operators face challenges in accessing or sharing publicly funded Amtrak and intermodal rail facilities. One current example to consider is the Washington Union Station Expansion Project. The most recent Supplemental Draft Environmental Impact Statement and Draft Section 4(f) Evaluation (SDEIS) for the major renovation project, identifies a preferred alternative for this project that includes a bus parking facility. However, the proposed facility cuts the current number of parking spaces from 60, down to 38 spaces (with some accommodation for peak periods), basically downsizing the facility and making no accommodation for future growth in motorcoach tour and travel services. This decision completely ignores the data, which indicates robust growth for the group tourism industry, while at the same time the District of Columbia has reduced the number of parking facilities able to accommodate motorcoach operations. More than 25 million visitors come to the

District each year (<https://washington.org/research/washington-dc-visitor-research#>), with a significant number arriving as part of a group and nearly a third of them traversing through Union Station at some point in their journey. These types of decisions, to reduce the capacity for groups to travel safely and be accommodated, thwart efforts to revive the travel and tour industry, by sending the entirely wrong message. Ironically, motorcoaches often operate in the stead of transit or trains in the event of a breakdown, or to perform emergency services, and are frequently contracted partners to these services. Yet, by restricting one mode's access in favor of another mode, these close working relationships appear adversarial. For example, the Amtrak Thruway program is a well-known supplement to Amtrak's operations and is seen as a travel multiplier providing passengers with access to destinations beyond Amtrak's existing train station network. However, it is often one mode of transportation making way for another one, rather than co-locating and co-existing, easing transfers between modes for the passengers (<https://www.nbc4i.com/news/local-news/columbus/greyhound-bus-terminal-leaves-downtown/>).

Another way infrastructure policy decision-making could help support long-distance travel and tourism is to provide additional places that are attractive locations to stop and park or rest. Since the 1960's rest areas and parking facilities have enjoyed public funding, generally coordinated by State departments of transportation. However, in looking at the inventories for state-run rest areas, maintenance of these areas have declined significantly. In Virginia alone, we note the number of available rest stops has decreased from 40 in 2001 to 19 today (<https://rga.lis.virginia.gov/Published/1998/HD16/PDF>; <https://www.welcomeva.com/map/>). In the state of Ohio, the number of rest areas has declined from 294 in 1961 to 89 today (<https://www.usatoday.com/story/news/nation/2017/04/01/highway-rest-stops-disappearing/99868368/>; <https://www.ohiorestareas.com/>). While development of private travel plazas has increased, such locations often do not offer the same level of accommodation or are designed to accommodate large commercial motor vehicles and passengers. Unfortunately, there is also limited coordination between State departments of transportation and the private developers of these travel facilities, particularly across state lines. This impacts key travel corridors, as many of the available parking facilities are not always incorporated into official travel maps or long-term travel planning. The DOT should lead in capturing this valuable information and serve as a fusion point for information sharing related to parking facilities.

In terms of motorcoach parking specifically (similar to truck parking), few initiatives are undertaken at federal, state or even the local level, to support providing safe, attractive places for drivers to park and rest. Which is particularly troubling, considering the federal hours-of-service requirements. At a minimum, a global compilation of available rest locations would be valuable. Right now, it does occur but only in a decentralized and de-aggregated way (e.g. http://www.godcgo.com/wp-content/uploads/2017/03/Motorcoach_Parking_List.pdf), by local CVBs or local departments of transportation. It would be far more beneficial for DOT to coordinate these efforts and increase parking availability and access for motorcoaches, along with improved access to intermodal facilities, to ease burdens for intermodal connectivity.

Another area where DOT could support travel and tourism through facilitating intermodal connections is by expanding the Essential Air Service or EAS program. By diversifying or expanding EAS to become in essence an Essential Transportation Program through use of other modes of transportation like motorcoaches, DOT would not only assist in reviving travel and

tourism, but also support increased connectivity for rural communities. A broad-based approach, including additional transportation options for passengers as well as expanding their flexibility to receive service and access key destinations would have lasting effects beyond the tour and travel industry.

2. What are the most regionally and nationally significant transportation facilities and corridors for current and forecasted long distance travel – and what data is this based on?

A challenge facing private over-the-road motorcoach industry is a lack of data, as there is no one place or entity within the Federal Government that collects data on the industry. The Bureau of Transportation Statistics (BTS) primarily focuses on car, plane and train travel data. In recent years, although BTS made some effort toward creating an intercity bus atlas, it has not really materialized due to limited funding; and then, even this initiative is limited primarily to the fixed route or scheduled service segment of the motorcoach industry, leaving more than 96% of the industry undefined. There have also been some limited efforts at the local level, which we have supported, have identified future travel corridors by understanding the composition of the vehicular traffic on certain roadways (<https://www.replicahq.com/>). However, much of these efforts, generally, focus on interstates as these facilitate the greatest amount of current and likely future long-distance travel. We believe evaluating arterial access points to tourism points of interest could provide helpful data, in support of facilitating travel and tourism goals and future infrastructure development. Data on vehicle speeds, capacity, levels of traffic, parking and rest facilities, and so forth on these arterial routes would assist in facilitating travel and tourism needs. We do know CVBs track tourism statistics, as does the U.S. Department of Commerce, but unfortunately such information does not appear to be integrated into the transportation planning framework.

We are hopeful, though, with the creation of a new Assistant Secretary for Travel and Tourism position at the Commerce Department and direction for a strategic plan, that some of these gaps in policy on the domestic travel and tourism front will be addressed by having the National Travel and Tourism Office more involved in coordinating domestic policy initiatives, with the same level of effort and interest the office has historically exhibited for international policy on travel and tourism.

3. What are the biggest challenges on the horizon to long-distance travel and what can DOT or other Federal Agencies do to help face these challenges?

One of the biggest challenges to future long-distance travel, in line with what we reference above, is creating obstacles or limiting access for certain modes of transportation to urban cores and tourism centers. As green travel alternatives are increasingly prioritized and pursued, investments must be made in the infrastructure to support the operations, ranges and charging/refueling times for low or zero emissions vehicles. As with rest areas and parking facilities, previously mentioned, fueling stations, access and availability for operators, must be prioritized within the infrastructure planning framework, in terms of its nexus to travel and

tourism. At present, provision for public transit and high emitting rail appears to be prioritized over other surface modes. Funding provided to localities to serve these modes, specifically, disincentives localities from considering all modes and ensuring an integrated approach is undertaken to decrease congestion and lower emissions. Like these other modes of transportation, motorcoach and group travel are congestion mitigators and champions of environmental sustainability, as motorcoaches are the most environmentally friendly surface transportation solution among heavy-duty vehicle operations. This point should be heralded by DOT and supported, as travel by motorcoach is a very viable, safe, and cost-efficient way for localities to address their environmental goals of reducing congestion and cutting emissions.

Conversely, projects like the New York Central Business District Congestion Pricing plan (NYC CBD CP) pose a very real potential challenge if they do not prioritize environmental goals of cutting emissions and reducing congestion or revenue generation. The current NYC CBD CP, leaving the final tolling decision to locals more focused on revenue generation than congestion mitigation, raises alarms across the tour and travel industry. If the final tolling plan does not prioritize congestion relief, but instead determines to toll buses and motorcoaches, it could very well make travel to the City, whether for tourism or even work, cost prohibitive. Motorcoach and bus passengers will stop making the trip, or worse, find other means that will not relieve congestion but possibly exacerbate it within the surrounding region. The major demographic of the motorcoach passengers are often underserved populations and rural populations, many on fixed incomes or not yet working. These passengers, generally, cannot afford major fluctuations in travel costs. Also, over 90% of motorcoach operators are small, family-owned businesses, particularly those serving the travel and tourism industry, who are similarly sensitive to price fluctuations and are forced to pass those variations on to their customers. If traveling to key New York City tour destinations becomes too costly, these operators will find other destinations – which is entirely contrary to the whole purpose of this DOT and Federal Government undertaking: to revive the travel and tourism industry.

4. Are there any laws or regulations that pose a barrier to long-distance travel?

At this time, other than laws and regulations that are intended to eliminate access barriers for motorcoach operations but are not being enforced, the only other potential barriers we wish to highlight are regulations concerning heavy-duty vehicle emissions along with limitations on access to funding programs for zero-emission conversion. The Environmental Protection Agency's clean truck rule and proposed Greenhouse Gas Phase 3 regulation, establishing new emission requirements, pose both technical and costly challenges for manufacturers of motorcoach vehicles and in turn for motorcoach operators. As well, with the Administration's singular focus on electric vehicles, the private industry is hard pressed to make this transition without assistance – including access to resources, infrastructure, and a regulatory environment supportive of the transition for the private industry.

5. Do you have any data or suggested resources DOT should use to help with understanding long-distance travel challenges, such as demographic or accessibility data?

The American Association of Automobiles (AAA) does an annual household survey on travel patterns. Tourism-related demographic and volume data may be available from CVBs as well as the Commerce Department's Brand USA. The BTS has data on intermodal facilities and which modes access them. There is also limited data from the National Park Service on vehicle type, traffic, group size, demographics and travel distance of their visitors. The American Trucking Research Institute (ATRI) studies bottlenecks where traffic impacts are severe to heavy-duty vehicle traffic. It would be interesting to model those locations against tourism nexus points when planning for future infrastructure improvements. There is almost no heavy-duty vehicle parking data, outside of limited local projects (e.g. <https://tetcoalition.org/wp-content/uploads/2015/02/I-95-Truck-Parking-Final-Proposal-Only.pdf>). By recognizing the strategic value of tourism to our economy and infrastructure development efforts, we believe that this data can be better coordinated and collected in the future.

6. Do you have any suggestions on how policy makers can support small, underserved, minority and rural travel/tourism businesses? Or underserved, minority and rural travelers or improve transportation accessibility?

Small, underserved, minority communities and rural travelers are the motorcoach industry's customers. Similarly, the motorcoach industry is dominated by small family-owned businesses. By supporting the motorcoach industry, and allowing it to be seen and prioritized, transportation accessibility will improve. Bringing together disparate parts of transportation planning to include tourism planning, as well as ensuring efficient intermodal access, will elevate our national transportation system as whole.

The motorcoach industry appreciates your interest in continuing to provide intermodal opportunities for the *entire* passenger transportation industry, and hopes DOT will increase its interest in specifically supporting the motorcoach, group travel and tourism industry as you re-think this strategic plan. Thank you for the opportunity to provide comment, and for your partnership and engagement throughout this process. We look forward to additional discussions on refining and implementing the updated Plan .

Sincerely,

A handwritten signature in black ink, appearing to read "Brandon Buchanan". The signature is fluid and cursive, with a long horizontal stroke at the end.

Brandon Buchanan
Director of Regulatory Affairs