

January 13, 2019

Public-Private Partnership (P3) Infrastructure Oversight Commission
c/o Kathleen Mulcahey-Hampson
7 Hazen Drive, P.O. Box 483
Concord, NH 03302-0483

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COMMISSIONERS OFFICE
JAN 15 2019

Dear Public-Private Partnership Infrastructure Oversight Commission,

THE STATE OF NEW HAMPSHIRE
DEPT. OF TRANSPORTATION

I would like to submit comments on the proposal from C&J Bus Lines to privatize the state-owned facilities that it operates in Dover & Portsmouth. I learned that such a proposal was under consideration by reading about the January 9 public meeting in Dover in two articles in Foster's Daily Democrat ("C&J offers plan to privatize bus terminals ", and "Bus terminal privatization questioned"). I subsequently read the Draft RFQ for the Privatization of the Dover and Portsmouth Bus Terminals posted on the NH Department of Transportation (DOT) P3 website (<https://www.nh.gov/dot/programs/public-private-partnership/index.htm>), as well as the DOT Frequently Asked Questions about ride sharing (<https://www.nh.gov/dot/programs/rideshare/faq.htm>).

I often park at the Portsmouth lot and use C&J bus service to access Boston Logan, and occasionally New York City, and I am very appreciative that the company provides timely and friendly bus service and has access to free parking. In fact, parking is a huge part of their business model, and it is very appropriate that a portion of the bus tickets that I buy contributes to parking lot and bus terminal maintenance and upgrades. Foster's quoted C&J president Jim Jalbert as stating "Thirty to 35 percent of the cars in Portsmouth are unrelated to us," which suggests that approximately two thirds of the cars in the lot are C&J customers or employees. To be successful without this public resource, the bus company would need to find a private alternative, which would undoubtedly increase company costs and likely reduce customer convenience.

I also use the north end of the same Portsmouth parking lot to carpool with friends and family for weekend day and brief overnight trips. The lot is optimally located to carpool north on Route 16, northeast on Interstate 95, south on Interstate 95, and west on Routes 33/101. In total, I estimate I use the lots once or twice a month; I am sure many others do as well.

Although it is commendable that the state is exploring creative funding mechanisms for upkeep and potential future expansion of the Portsmouth and Dover lots, I oppose this particular privatization proposal for the following reasons:

1. The Portsmouth and Dover park & ride lots are a valuable amenity to Seacoast residents, and a charge to access them for carpooling would be an added cost and annoyance. There is a network of publically funded park & ride lots located all over the state, none of which currently charges a fee for private use. Instituting a fee to use the Dover and Portsmouth lots would be unfair to Seacoast residents and taxpayers.
2. As the DOT FAQ states so eloquently, ride sharing enables NH residents to save money, relax, reduce air pollution, save time by driving in high-occupancy vehicle lanes, and reduce congestion on NH roads; all of these are laudable goals for government projects. Several of these benefits (in particular, reducing air pollution and congestion) are externalities that benefit all NH residents, whether or not we carpool. Carpooling already has the disincentive of requiring more advanced planning and compromise than driving alone. Our state government should be working to promote and reward carpooling, rather than increasing transactional costs (parking fee, and the effort/time to pay the fee) for carpoolers, which would inevitably discourage carpooling.
3. A fee for parking would be a new tax placed on carpoolers. The RFQ (p. 4) suggests that a percentage of the fee will be remitted to state coffers, which means that the state is not only seeking to stop supporting carpooling at these locations but also to profit from it. Parking rates will need to be set high enough to cover tax payments to the state and municipalities, as well as fund infrastructure and personnel associated with collecting fees, suggesting that substantially more money will need to be collected than what is necessary for facility upkeep.

4. The RFQ (p. 3) suggests that NH DOT wants to encourage parking lot use by four populations:

- a. Persons utilizing the C&J bus service
- b. Persons utilizing other transit services (e.g., COAST)
- c. Commuters, presumably regular carpools and vanpools to Boston
- d. Persons using other shared ride activities, presumably including intermittent or off-hour use

If chosen as the parking operator, C&J bus lines will understandably be sensitive to the needs of the first user group, who also provide them with bus ticket revenue. There is nothing in this 30-year contract, however, that would encourage them to protect the interests of the other populations. Promoting private carpooling to Boston is actually against their business interests, since those commuters would not be taking the bus. The parking operator appears to be able to adopt policies that would, for example, provide free (or deeply discounted) parking for bus riders, or perhaps those who purchase a frequent parking permit, and set an exorbitant price for others, essentially creating a monopoly on the use of this public resource constructed with federal FHWA funds on public land, and/or shifting expenses to support bus operations from bus riders to carpools. The RFQ (p. 3) contains some vague boiler plate claims that it will "increase potential for the use of...carpooling and vanpooling," but there appears to be no mechanism for the state to review parking rates and policies to ensure that all of the above user groups are accommodated equitably.

5. The Foster's articles suggest that one problem with current parking lot usage is that private companies (regional shuttles, airport parking, etc.) are using the facilities maintained by C&J. I can understand why C&J is complaining, when they are taking responsibility for many of the expenses associated with facility upkeep. However, according to the DOT FAQ page cited above, there is a mechanism already in state statute to share the cost with these other entities: "at lots that have bus terminals, fees not to exceed \$30 may apply to charters and other unscheduled passenger transportation utilizing the lot." This contradicts Jim Jalbert's statement, quoted in Foster's, that "there is nothing we can do about that." I would support having DOT and C&J enforce the existing mechanism to share costs among all commercial users, before taking the big leap of privatizing this high-value, optimally situated, well used public resource. It also seems that, if extended stays are a problem, the maximum duration of free parking could be reduced from 21 days.

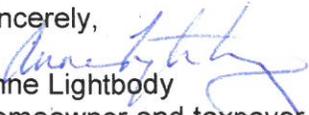
5. Park & ride lots reach maximum capacity during a few weeks of spring and summer school vacation; I personally have never encountered them at capacity. It seems like a waste to build and maintain sufficient additional parking to accommodate short-lived peak demand, when the lots would sit vacant most of the time. There is no incentive in the current RFQ to incentivize exploring other options (e.g., valet parking at school facilities) that would avoid paving over more of our beautiful state. In addition, this seasonal usage structure is likely driven by bus riders heading south for vacation, and it seems unfair that carpools are being asked to subsidize extra parking lots for bus riders, as well as to shoulder the burden of upgrading the terminal buildings used by bus passengers.

6. Even though peak usage appears to be the main problem, the RFQ suggests that fees will be instituted year-round, even for those of us who are not contributing to peak usage. In fact, the RFQ refers to a "predictable revenue stream," rather than being structured to provide financial incentives to reduce peak demand. Again, this sounds like a tax on carpooling by private citizens.

I appreciate that the NH state government is attempting to strengthen public-private partnerships to leverage its limited resources. However, the proposed plan seems to take the public out of the partnership and instead allow a (regionally valuable but still private) commercial entity to gain exclusive use of a public facility, while imposing an unwanted tax on Seacoast residents.

(By the way, perhaps the monies allocated to construct a NH welcome center in Dover that would be redundant with the existing welcome center in Seabrook and luxurious liquor stores in Hampton and Portsmouth would be better spent on public infrastructure such as park & ride lots.)

Sincerely,


Anne Lightbody
Homeowner and taxpayer
Durham, NH