

S U B M I S S I O N

Review of bus services in Boroondara, Glen Eira & Stonnington

seven day service

modern operating hours

direct & legible routes

high frequency

harmonised headways

serves major trip generators

better connections

area & corridor planning

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Introduction

The recently-announced area reviews of metropolitan bus services are welcome. They potentially present a 'once in a generation' opportunity to make public transport a mode of choice for the sixty per cent of Melburnians beyond walking distance of fixed rail services.

In this submission, which covers Boroondara, Glen Eira and Stonnington, we advocate a more efficient local bus network where each route has a defined purpose, status and commensurate service level.

Unlike other suburbs, which typically have two or three railway lines serving 'to city' travel and no trams, all three areas covered here have extensive train and tram networks. A substantial proportion (though probably still not a majority) of residents can walk to relatively frequent train and tram services with long operating hours. Trams along major roads do what buses do in other areas, and there are even some tram routes that provide cross-suburban as well as 'to CBD' travel.

Notwithstanding that, in all but a few tram-intensive suburbs buses still serve a local travel need, especially for suburban shopping malls which are rarely served by tram. The major exception is the direct ex-PTC bus routes in the older of Stonnington, Boroondara and Glen Eira which retain almost tram levels of service. Outside these areas though the buses tend to be for local travel with quite limited service levels.

Status levels of routes can be either primary, secondary or tertiary. The former offer the longest operating hours, with service until midnight. Secondary routes run seven days per week until 9pm, ie similar to the government's MOTC standard. Special or tertiary routes may run during peak times only or provide a limited community-type service where coverage from other routes is missing.

We support fewer variations in service levels and holiday arrangements than currently exist. Those that remain would depend on the routes purpose and status. For example direct routes along main roads would run more frequently and over longer hours than local routes that do not serve major trip generators. Any reduced summer timetables would delete only a small number of peak services, and not weekend, off-peak and evening services, as occur on some National Bus and MBL routes.

Connections and frequencies would improve though headway harmonisation with trains and co-scheduling related routes along corridors to provide a frequent combined service.

We have sought to make routes simpler and more direct. Because resources are limited we have sought to minimise the number of new routes created, as we know this makes it harder to boost service levels on existing routes. However due to the paucity of routes in some areas we unavoidably had to create some to retain or improve coverage.

This submission comprises three parts. The first reviews the characteristics and needs of local areas. The second lists proposed changes by route number. Third are the appendices. These describe some general principles of service planning, provide some local case studies and include maps of proposed revised routes.

Part One: Major bus service issues in Boroondara, Glen Eira and Stonnington

The review area is best described as established residential with shops clustered around train lines and in ribbons along tram routes. Developed before the car became dominant, public transport coverage is higher than in newer, outer areas. All three areas have high average incomes and the suburbs of all three feature amongst Melbourne's most desirable, with million dollar homes not uncommon.

Nevertheless there are substantial renter and student populations, particularly in Stonnington and Glen Eira, which both have a high proportion of units. Because of their good public transport and handy shopping strips many of these households find they do not need a car.

Overseas students, in particular, are high users of public transport and their social and work activities create significant transport demand at all hours of the day, but particularly at night. And because they pay full fare, attracting their patronage is more lucrative than attracting seniors or pensioners, who travel on concession or discount senior fares.

Major route and service matters in Boroondara, Glen Eira and Stonnington are as follows:

- Service reliability. This is a major issue in western parts of the survey area (eg Prahran and Balwyn) where buses serve the Melbourne CBD and may be held up by inner suburban traffic. Non-CBD routes are less affected, though even these are not immune from traffic and level crossing delays. Bus priority is recommended here.
- Service span and frequency. While cited in all parts of Melbourne, Glen Eira and Stonnington differ in that their western parts have high-quality bus routes (eg 216/219, 246 and 220) that offer almost tram-like service spans and frequencies so it's much less of an issue. Whereas the eastern parts of the study area are more like the rest of Melbourne with their typical 30 to 60 minute service frequencies and shorter operating hours. Improved Sunday services to major shopping centres (such as Chadstone) are perhaps the single biggest area for improvement and the recent introduction of a basic hourly service on most routes (previously nothing) has been a great success worth building on.
- Poor legibility due to route variations, indirectness, double-backing or use of two route numbers when one will do. This is not universal as there are routes such as 220 and 246 that are highly legible. However there are cases where similar routes (eg 216/219 or 811/812) use two numbers that could become one with routing changes. Conversely, sometimes one route could usefully be split with two or more route numbers for better legibility. The examples of 624 and 627 are given later. Less importantly, changing an 'out of sequence' number like 862 to something like 803 would also boost legibility by marking it as part of a related route family (with 802 and 804).
- Variations due to public holiday and summer timetables, still an issue though gradually reducing as more routes run full service throughout the year. Most pronounced on MBL routes, where waiting times can double, even during off-peak times. Some National Bus and Easttrans routes also reduce service during summer. The justification for extended off-peak summer service reductions (in particular) is shaky and they can reduce the legibility and simplicity of the network. Public holiday timetables are an issue because of the confusing treatment of different holidays on different routes. Possibilities range from no service, to special timetable to Sunday timetable to Saturday timetable. We encourage further harmonisation both in the alignment of summer timetable dates and in standardising public holiday arrangements to the MOTC service pattern.

- A substantial network gap where there are no direct services between Caulfield and Camberwell, even though such a route would serve passengers on nearly half of Melbourne's railway lines (Belgrave, Lilydale, Alamein, Glen Waverley, Pakenham, Cranbourne, Frankston) and amongst the busiest. This lack means passengers have to needlessly backtrack towards the CBD for some trips. The nearest route to it (624) is neither frequent nor legible and has other issues as discussed later.
- A direct link to Port Melbourne and central St Kilda from the Glen Eira and Bayside area. The St Kilda link was recently acknowledged through the introduction of the weekend-only Route 3A tram. Port Melbourne is a substantial employment area, but local buses may only run every 50 minutes and during peak periods only. This submission recommends improvement here through an enhanced 606 extended to Elsternwick via Elwood Village and the removal of 600/922/923 in the area to help resource it.
- A tendency for some routes to stop just short of trip generators and logical interchange points such as railway stations. Historically this may have happened on bus (and tram) routes as their main purpose was to serve the city only. Examples include 605 and 627 (extend to Brighton area railway stations), 630 (extend to Elsternwick) and 609 (extend to Hawthorn). Extending such routes by 1 – 3 kilometres would improve connectivity and build additional patronage.
- Links to major shopping centres from some areas. Ashburton is an area that is close to Chadstone but has no direct service to it (not all areas are served by the 612). Another gap, mostly outside the study area, is a direct route to Southland from Elsternwick via Nepean Highway. This submission makes recommends on both these topics (refer to proposed 613 and revised 823 below).
- Improved cross-suburban links to the Ivanhoe area from Boroondara. While routes exist service levels tend to be limited.

Although housing densities are rising, and are expected to rise, due to the desirability of these areas and the acceptability of unit living, population growth will not be as high as the metropolitan average. For this reason, and to maximise the resources that can be put into service increases, we have sought to minimise the creation of new routes. Hence our recommendations mainly concern small extensions or changes to existing routes with only one new route proposed in the review area.

Part Two: Recommendations by route

The following are the above amendments, but in a more detailed route-by-route form.

Many routes stated as being in this review area pass through it but have their main service areas elsewhere. In many cases suggestions for them have already been made in review submissions for other areas (eg Bayside, Kingston, Monash, Whitehorse, Manningham) and a detailed repetition of them has been avoided here.

These are shaded in dark grey on the table below. Copies of the relevant submission that discusses them in detail are available on request.

Route	Purpose	Status*	Recommendations
200	Redefine as primary route to Doncaster via Kilby/Bulleen Rds.	P	
201	Defined as City – Doncaster local route via Belmore Rd	S	
202	Defined as Box Hill – Kew local route via Belmore Rd.	S	Retain co-scheduling with 302
203	-	-	Abolish. Use resources to boost services on Route 200.
205	-	-	Abolish this peak-only route. Use resources to boost services on Route 200.
207	Redefine as primary TramLink service between terminus of 48 tram, Doncaster Shoppingtown and Doncaster Rd.	P	
216			Combine with 219 and truncate at Elsternwick. Refer to Bayside submission.
219			Combine with 216 and truncate at Elsternwick. Refer to Bayside submission.
220		P	Terminate at Elsternwick. Remove reduced service summer timetable. Refer to Bayside submission.
246	Retain in current role.	P	Upgrade frequency to 30 minutes at times when it is poorer than this. Standardise public holiday arrangements (ie Saturday timetable for all holidays except Christmas and Good Friday).
284	Redefine as new north-south local route: Burwood – Union Rd – Greythorn Rd –	S	Doncaster & Greythorn Rd portion retained and added as part of extended 766 to provide new N-S linkage.

Route	Purpose	Status*	Recommendations
	Doncaster Shoppingtown.		Portion of route that duplicates 109 tram deleted. Schedule to connect with trains at Surrey Hills.
285	Retained as Camberwell – High St – Glen Eira Rd – Doncaster SC route	S	Reduce number of service deviations at Camberwell end.
301	Defined as City – Pines service via Thompsons Rd and Porter St	P	
302	Defined as City – Box Hill local route via Belmore Rd.	S	Retain co-scheduling with 202.
303	-	-	Abolish Resources used to upgrade services on 270.
304	Defined as City – Pines service via Blackburn Rd	S	
305	Redefined as primary route via George St.	P	
306	-	-	Abolish in current form. Replace with a new peak-period route that operates as per current 306 but terminates at at Mitcham Station instead of going into the CBD. Increase frequency and span compared to existing 306.
307	Redefined as primary route to Mitcham.	P	
308	Redefined as King St local service.	S	Upgrade to secondary status to provide King St with a full-time service. Abolish 319 peak-only service.
309	Redefined as City – Reynolds Rd – The Pines – Pine Hill Dr local service.	S	Delete Pine Hill Dr – Springvale/Mitcham Rd portion – duplicates 273.
313	Define as Templestowe Village peak service.	T	
315	Define as Greythorn Rd peak service.	T	
316	-	-	Abolish Resources used to improve services on 305 and 307.
319	-	-	Abolish Resources used to upgrade 308 to secondary status.
340	Retain	S	
350	Retain	S	
548	Retain	S	

Route	Purpose	Status*	Recommendations
605	Retain as local service.	S	<p>Extend to Middle Brighton Station to provide logical termination point.</p> <p>Review need for CBD loop.</p> <p>Improve frequency to clockface levels, extend hours to MOTC standard and adopt public holiday standard pattern.</p>
606(*) (* Not in review but extension suggested is in review area.	Redefined as Port Melbourne – St Kilda – Elsternwick link	S	<p>Extend from St Kilda to Elsternwick via Elwood Village. This replaces 600/922/923 that is recommended for deletion in this area.</p> <p>Purpose is to improve links to the Port Melbourne area from the major interchange at Elsternwick and hence the inner-southern suburbs.</p> <p>Increase frequency and operating hours to MOTC standard.</p>
609	Redefine as cross-suburban link.	S	<p>Extend to Hawthorn Station to provide cross-suburban link.</p> <p>Increase service level.</p>
612	Retain as local Chadstone – Camberwell – Canterbury Rd – Box Hill route	S	<p>Reduce number of service deviations.</p> <p>Eliminate the confusing separate school day/school holiday timetables.</p>
NEW ROUTE 613	Defined as Chadstone – Ashburton – Glen Iris – Kooyong local route	S	<p>A new service that fills a major gap between tram lines, provides a Chadstone link and serves the Coles HQ.</p> <p>Operates from Chadstone Shopping Centre via Warrigal Road, High Street, Ashburton Station, Summerhill Road, Toorak Road and Glenferrie Road to Kooyong Station.</p> <p>This versatile service effectively extends Route 8 tram to Ashburton and Route 75 tram, provides a more direct alternative to the 612, extends local coverage and provides a Chadstone link.</p> <p>Operation 7 days per week to MOTC standards is suggested.</p>
623	Retain as east-west route from Glen Waverley to St Kilda and Chadstone feeder.	S	<p>Reroute to operate via Neerim Road, Murrumbeena and Carnegie to replace existing 624 and reduce duplication with 627, 900 and 822 along Dandenong Rd.</p> <p>Reroute to operate via Caulfield Station, as recommended by Booz & Co in Whitehorse/Monash review.</p> <p>Upgrade weekend daytime frequency to 20 or 40 minutes to cater for Chadstone Shopping Centre patronage.</p>

Route	Purpose	Status*	Recommendations
624	<p>Redefine as two routes:</p> <p>Local service for eastern part of Chadstone between Oakleigh and Chadstone shopping centre (625).</p> <p>Important north-south Caulfield – Camberwell area – Kew link (624).</p>	S	<p>Split route at Chadstone and Caulfield for legibility.</p> <p>Delete Chadstone – Caulfield portion (both Carnegie and East Malvern parts) as these largely duplicates other routes, and, in the case of Neerim Road, the proposed rerouted 623.</p> <p>Operate remainder as two routes: 624: Kew – Caulfield & 625: Chadstone – Oakleigh. Run occasional extensions to Glen Eira College on school days.</p> <p>Divert 624 to Camberwell to provide missing Camberwell – Caulfield link and upgrade frequency.</p>
627	<p>Redefine as two local routes:</p> <p>N Brighton – Carnegie – Chadstone (626).</p> <p>Elsternwick – Ormond - Chadstone route (627).</p>	S	<p>Split route at Chadstone for legibility.</p> <p>Operate as separate routes: 627: Elsternwick – Ormond – Oakleigh – Chadstone & 626: Brighton – McKinnon – Carnegie – Chadstone.</p> <p>Extend 626 to Middle Brighton Station to provide improved E-W link and Chadstone connection.</p>
630	Redefine as primary route Elsternwick – Ormond – Huntingdale – Monash Uni	P	<p>Extend to Elsternwick to provide interchange opportunities with train, train and buses.</p> <p>Adopt MOTC public holiday patterns.</p>
684	Country service – retain	T	No change.
700/903	Retain as primary route Box Hill – Mentone	P	Incorporated in 903 orbital.
701	Retain as local route Bentleigh – Oakleigh (unchanged)	S	Review need for route deviation on this service.
703	Retain as primary route Blackburn – Clayton – Bentleigh – Brighton (unchanged)	P	<p>Increase Saturday service frequencies from a non-harmonised 30 minutes to a harmonised 20 minutes.</p> <p>Increase Sunday service frequency from a non-harmonised 45 minutes to a harmonised 20 minutes.</p> <p>Implement bus priority along entire route but particularly where buses turn in to University. Ensure bus priority measures apply to all buses, not just SmartBuses.</p> <p>Extend Sunday service to Brighton to be consistent with rest of week.</p>
734	Retain as local route Glen Iris – Glen Waverley	S	No change
742	Redefine as primary route Mitcham – Vermont South – Glen Waverley – Uni.	P	<p>Provides more direct service between Mitcham and Vermont South/Glen Waverley using existing 736 route.</p> <p>Deleted portion of 742 in Mitcham area is serviced by extended 740.</p>

Route	Purpose	Status*	Recommendations
			Ringwood link is provided by straightened 765. Delete Uni – Chadstone – Oakleigh portion as this duplicates other services.
766	Redefine as local route: Burwood – Union Rd – Greythorn Rd – Doncaster Shoppingtown. Renumbered as 284.	S	Operate to minimum hours. Extend to Doncaster Shoppingtown and renumber as 284. Delete portion of route along Mont Albert Rd due to low usage.
767	Redefine as primary route Box Hill – Deakin Uni – Chadstone - Southland	P	Upgrade to train service frequency and extend operating hours to beyond 9pm. Add peak services to portion of route around Deakin Uni to resolve overcrowding.
800	Define as Princes Hwy service (unchanged)	S	
802	Define as Chadstone – Wheelers Hill – Dandenong local route (unchanged)	S	No change
804	Define as Chadstone – Wheelers Hill – Dandenong local route	S	Reroute in Wheelers Hill area (Garnett & Marykirk Dr) to compensate for the removal of 754.
811	Major route between Sandringham and Dandenong.	P	Remove service from Brighton area and instead operate from Sandringham for improved directness. More detail in Bayside and Greater Dandenong submissions.
812	Local route	S	More detail in Bayside and Greater Dandenong submissions.
822	Retain as local Chadstone – Southland service.	S	Operate direct along Murrumbeena Road/East Boundary Rd for better legibility and to serve new housing estate (old Murrumbeena High School). Southland/Sandringham portion discussed in Bayside review.
823	Redefined as major Elsternwick – Moorabbin - Southland route via Nepean Highway.	S	Straighten existing Route 823 and operate via Nepean Highway from Elsternwick to Southland via Moorabbin.
824	Defined as major South Rd and Police Rd service operating Moorabbin – Clayton – Waverley Gardens.	P	Extend to Waverley Gardens Shopping Centre to provide fast frequent link to Clayton Station. (Clayton - Keysborough route is retained as part of an extended 704)
862	Define as Chadstone – Wheelers Hill – Dandenong local route (unchanged)	S	Renumber as 803 to show relationship with 802 and 804 in area.
900	Define as primary Caulfield – Stud Park route	P	Upgrade weekend services to train frequencies (20 minutes)

Route	Purpose	Status*	Recommendations
			Extend Sunday services to 11pm or later (at least to Uni) to provide more connections with trains.

(*) Status key: P = primary, S = secondary, T = tertiary. Where routes are in a group the overall service status recommended generally relates the the entire group rather than each constituent route.

Conclusion

Described is an approach with suggested changes that would go a long way to improving public transport service quality and thus patronage in Boroondara, Glen Eira and Stonnington. It advocates an integrated network of frequent routes between major trip generators and timetables that mesh with trains. Special attention has been paid in responding to modern travel patterns, serving local corridors and providing direct feeder services.

Part Three: Appendices

Appendix One: A general approach to bus route planning

This submission supports a key performance indicator for public transport service provision along the lines of the following:

- 80 percent of residents (and 90 per cent of workplaces) are within fifteen minutes walk of a public transport service that operates at least every fifteen minutes seven days per week.

Given 20 minute weekend running of trains in the study area, a fifteen minute target requires more than just bus reform. However accepting a looser twenty minute frequency target on weekends is much easier and could be an aim of this review.

As well as good frequency and operating hours, bus routes must be direct and serve major trip generators. This is both for the benefit of passengers (in reduced travel time) and the Department (in operating economies). From our current network (which includes many circuitous routes) it may be possible to extract an 'efficiency dividend' which can be used to provide more frequent services for more hours of the day over more days of the week.

Other planning principles include the desirability of providing access to nearby railway stations and regional shopping centres. Ideally routes should have trip generators at either end so that it can attract patronage in both directions. For example, a local route might operate between Box Hill Station and Ringwood Station.

Except to augment capacity on major corridors or provide short-distance travel in suburban activity centres, route duplications should generally be kept to a minimum. However where they exist there are major opportunities to exploit overlaps to provide a more frequent combined service.

An example would be staggering the timing of two 30 minute routes to provide an even 15 minute service over the combined section. If the combined section is near a railway station, this would result in buses meeting every train, thus strengthening their 'rail feeder' function. If connections are poor, this can be overcome by bringing all services forward or back by ten minutes or so.

Headway harmonisation has similar benefits. If all buses in the area are either every 15, 30 or 60 minutes this provides consistent connections that are not possible with a mix of 25, 40 and 50 minute services (which exists at the moment).

Harmonised headways are no cure; unless all services are frequent some connections may be poor. However this would be a lower risk for connections with major routes (due to their frequency) and at least it would be consistent. In addition there is the possibility of remedy if the connection is deemed important enough. Opportunities for bus to bus connections potentially exist at any point where two routes intersect, but are greatest at railway stations and near major shopping centres.

The following steps are advocated:

1. Identify key regional trip generators, interchanges and corridors
2. Identify the community's transport needs and undeveloped patronage opportunities.
3. Assess the strengths and weaknesses of the current network in relation to needs.
4. Design a network of 'primary' routes between major nodes, providing fast and frequent links from early morning to late at night.

5.Design a local network of well-connected 'secondary' routes catering for trips outside the primary network

6.Examine means to provide superior service. Possibilities include co-scheduling overlapping routes (ie timing two less frequent routes to provide a more frequent combined service), introducing a harmonised headway hierarchy, designing and exploiting connection opportunities, making routes more direct and extending service to a nearby interchange.

The role of various routes is shown in the table below:

Route type	Role	Days & Span	Frequency
Primary	<p>Links key railway stations, major activity centres, regional shopping centres and large education campuses.</p> <p>Also a feeder for major suburban areas remote from railway stations.</p> <p>Fast and direct along main roads.</p>	<p>Early morning until midnight seven days per week.</p> <p>NightRider services may overlap some primary routes, providing later services.</p>	<p>Peak: 10 or 15 min Weekday: 15 min Weekend: 20 min Night: 30 min</p> <p>Services are train frequency at all times with similar operating hours.</p>
Secondary	<p>Links residential suburbs to local railway stations and shopping areas.</p> <p>As direct as possible between and within suburbs.</p>	<p>Early morning until 9pm seven days per week (ie MOTC min standards).</p>	<p>Peak: 15 or 20 min Weekday: 30 or 60 min Weekend: 40 or 60 min Night: 60 min</p> <p>Consistent connections with every train or every second train.</p> <p>Headway harmonised.</p>
Tertiary	<p>Serve localities or destinations that are poorly served by primary and secondary routes.</p> <p>Circular, loop and/or unidirectional routes allowed.</p>	<p>Five or six days per week.</p> <p>May be peak-only or interpeak services.</p>	<p>Infrequent and/or limited hours.</p> <p>Between 2 and 10 services per day.</p> <p>Connections with selected trains only if relevant.</p>

Appendix Two: Case studies



Case Study 1: 624

Factors that hold this route back

- * Tries to do too many things: (a) north-south link, (b) local route for Carnegie/Murrumbeena, (c) local route for East Malvern, (d) local route for Chadstone area
- * Poor legibility due to alternating Carnegie and East Malvern trips
- * Parts duplicate other routes (eg 623 and 900 along Dandenong Rd)
- * A major coverage gap (Caulfield - Camberwell area) and potential trip generator is treated as a quiet local route with indirect and infrequent service.

A suggested service makeover

- * Regard as three or four separate routes: (a) Caulfield - Kew, (b) Caulfield - East Malvern - Chadstone, (c) Caulfield - Carnegie - Chadstone, and (d) Chadstone - Oakleigh
- * Boost service and marketing of the Caulfield to Kew portion as a fast link between the city's two busiest railway lines (Belgrave/ Lilydale and Cranbourne/ Pakenham/Frankston)
- * Delete the Carnegie portion - this can be served by diverting Route 623 via Neerim Rd
- * Retain Oakleigh - Chadstone as a local service.

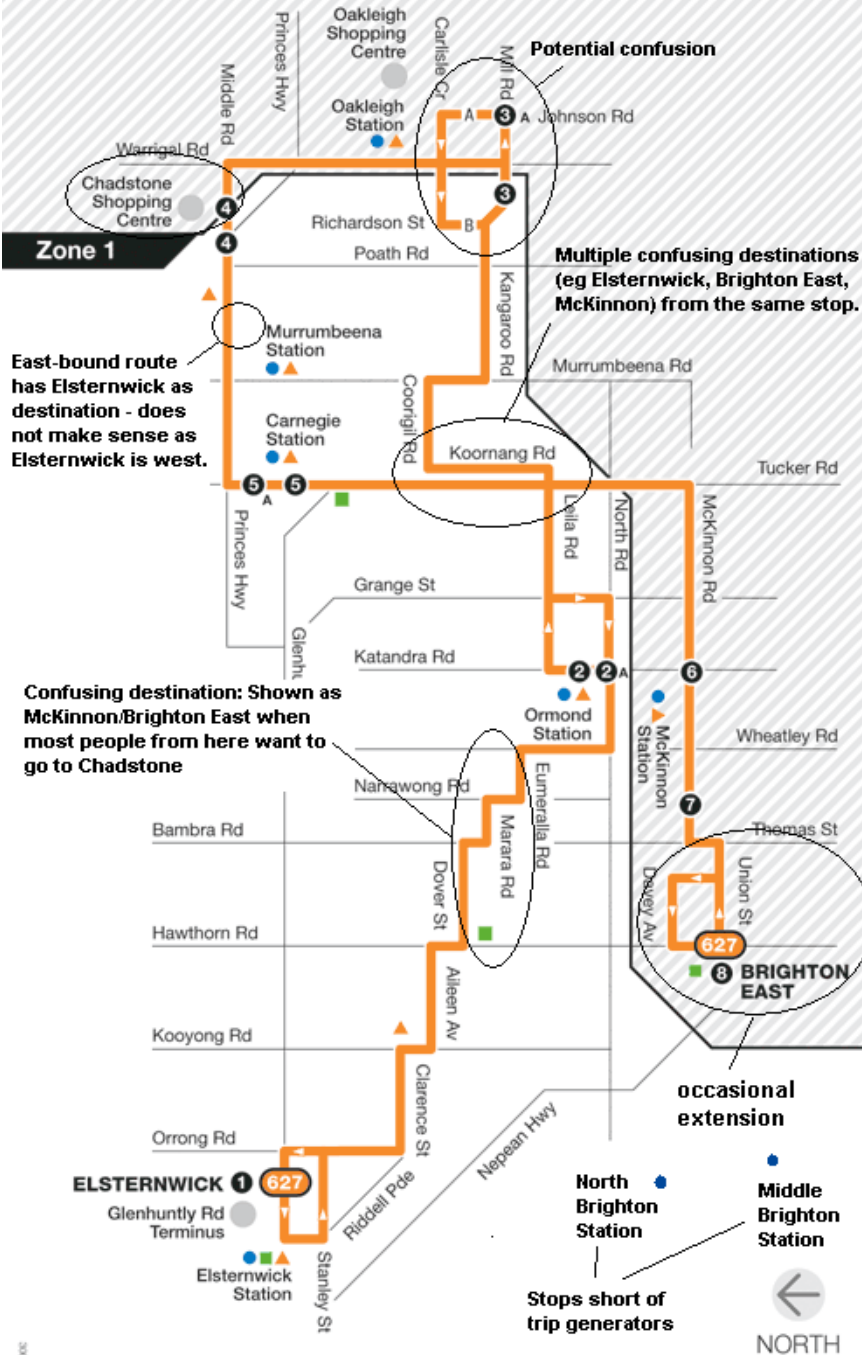
For further information call
131 638 / (TTY) 9619 2727
(6am-10pm daily) or visit
metlinkmelbourne.com.au
MAP NOT TO SCALE

Elsternwick – Brighton East



Route 627 via Ormond > Oakleigh > Chadstone > McKinnon

Zone 1 or 2



Case Study 2: 627

Factors that hold this route back

* The route double-backing onto itself with the same stops along a section of Koornang Rd serving multiple destinations

* Melbourne's least direct non-circular route, with the origin and destination a few kilometres apart.

* Destinations that do not align with the main trip generator for the route (ie the bus will display East Brighton, not Chadstone)

* An occasional extension (McKinnon - East Brighton) that runs more frequently on Saturdays (every trip) than weekdays (every third trip approx).

* Route terminating short of a nearby interchange point and trip generator (eg North Brighton or Middle Brighton Station)

* Limited operating hours and no Sunday service despite Sunday being one of the busiest trading days of the week at its main trip generator.

* Counter-intuitive travel directions - eg travelling north to a destination to our south.

The above factors make 627 one of the least usable and effective bus routes in Melbourne, but also one whose major problem can be fixed for no continuing operational cost.

A suggested service makeover

* Split route at Chadstone and renumber one portion. This eliminates the double-backing, crossover and multiple destination problems. This will cost nothing.

* Provide for consistency and better connections by extending all McKinnon and Brighton East services to either North Brighton or Middle Brighton Stations (about 3km).

* Extend service hours to normal local standards (ie similar to 623 & 624)

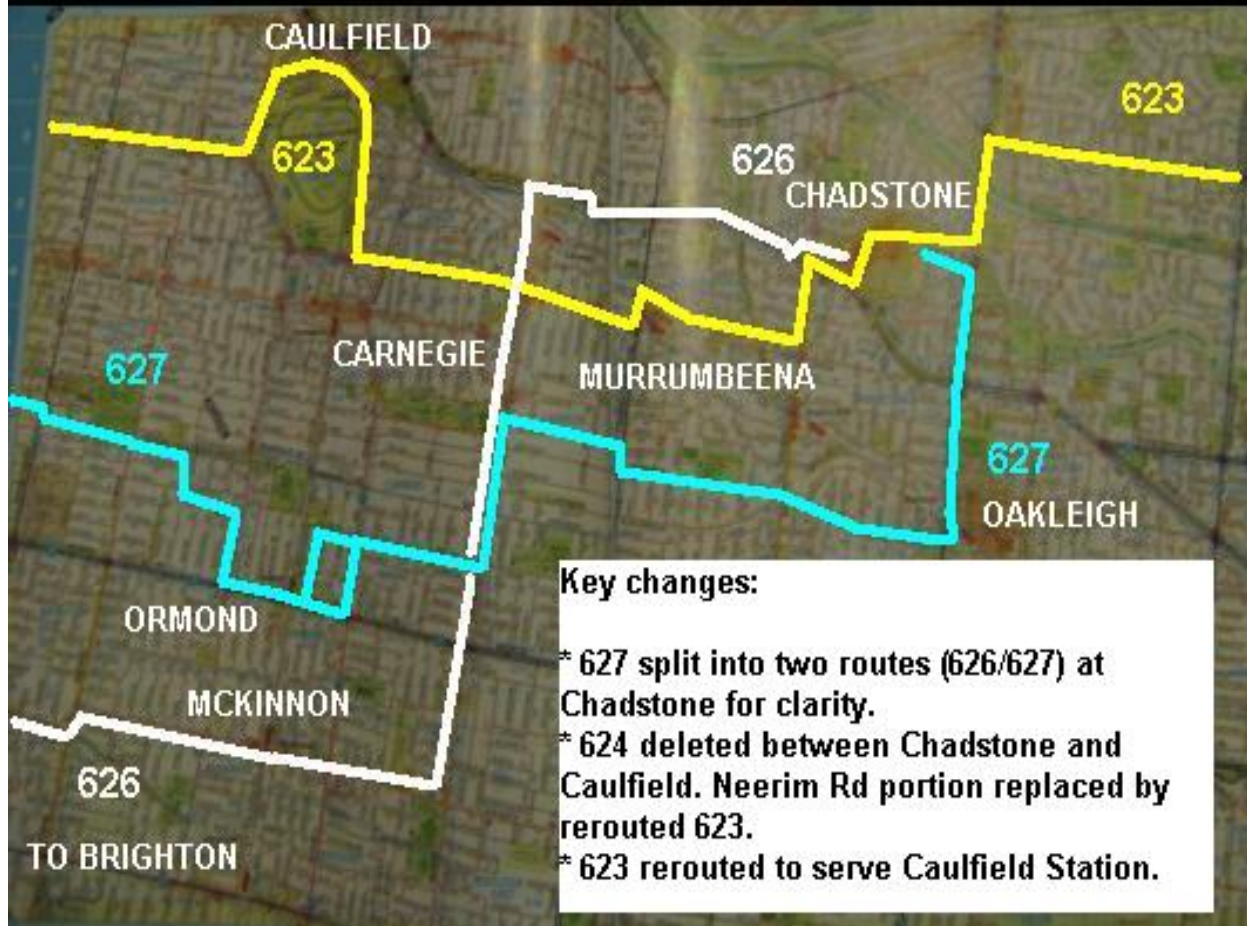
For further information call 131 638 / (TTY) 9619 2727 (6am-10pm daily) or visit metlinkmelbourne.com.au
MAP NOT TO SCALE

Appendix Three: Maps

Following are maps of some of the more important additions, deletions and extensions proposed above. Only changed routes are shown, not existing unchanged routes.

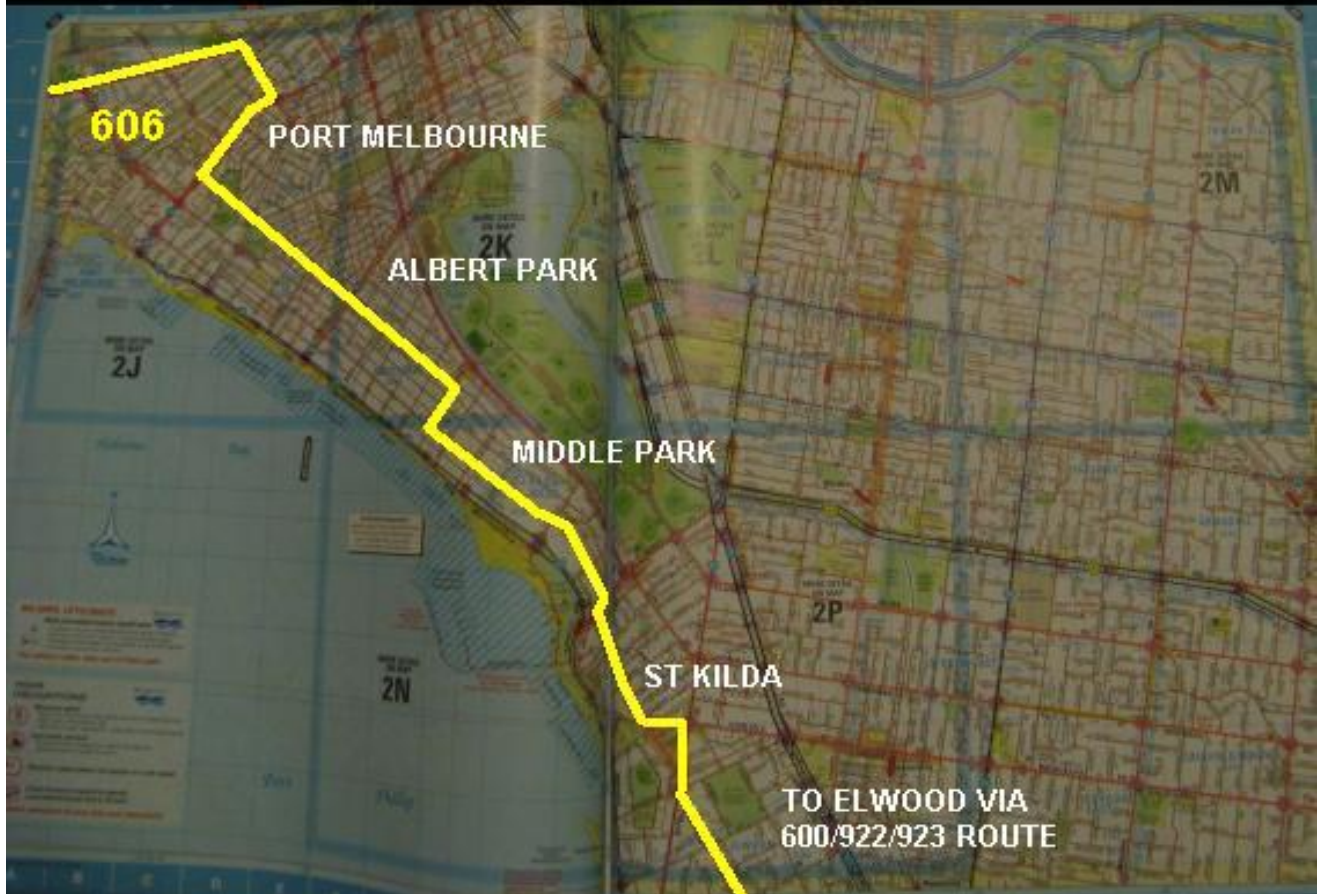


Proposed Carnegie area buses

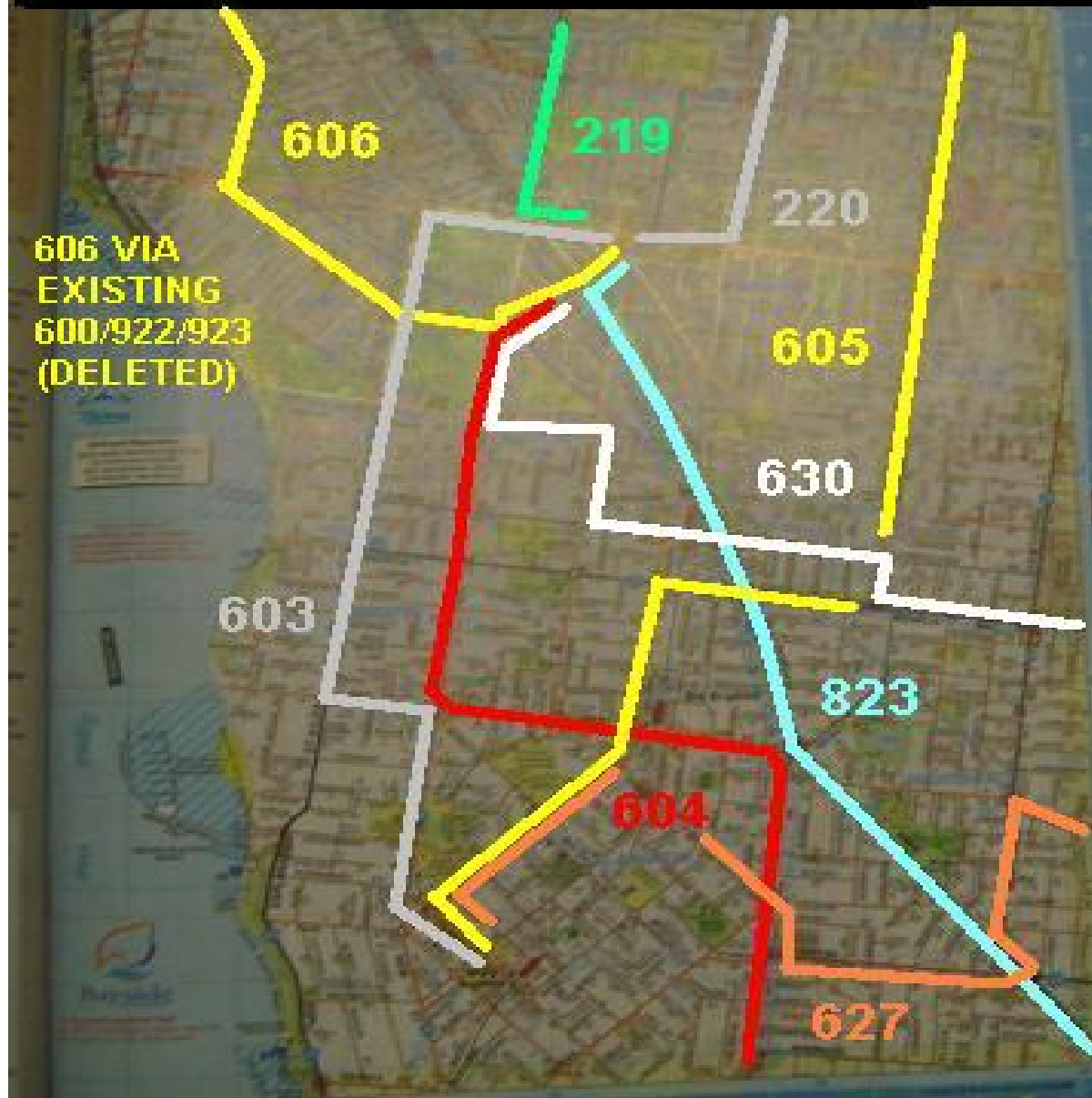


Proposed extended Route 606

PORT MELBOURNE - ST KILDA - ELWOOD VILLAGE - ELSTERNWICK



PROPOSED ELSTERNWICK AREA BUSES



Note: Routes shown not discussed above are covered in the Bayside/Kingston submission.