



CITY OF NEW YORK

MANHATTAN COMMUNITY BOARD FOUR

424 West 33rd Street, Suite #580 New York, NY 10036
tel: 212-736-4536
www.nyc.gov/mcb4

JESSICA CHAIT
Chair

JESSE R. BODINE
District Manager

November 4th, 2024

Donald Burns, AICP
FTA Director of Planning and Program Development
FTA Region II
One Bowling Green, Room 428
New York, New York 10004

Ky Woltering, PhD
Environmental Protection Specialist
Federal Transit Administration – Region 2
Office of Planning & Program Development
One Bowling Green
New York, New York 10004

Re Port Authority bus terminal replacement project
FEIS comments

Dear Mr. Burns and Mr. Woltering,

Manhattan Community Board 4 (MCB4) has reviewed the Final Environmental Impact Statement for the Bus Terminal Replacement project and would like to submit the following comments:

As referenced in our previous letters, we continue to believe the mitigation measures proposed to be insufficient in many respects, considering the unique combination of factors in this unusual project: the size of the project, (spanning four avenues in New York) the extraordinary length of this project (10 years +), the very disruptive nature of the construction (tunnel, ramps and bus gates), the presence of the Lincoln Tunnel and its traffic and the close adjacency to a dense residential district.¹

¹ <https://cbmanhattan.cityofnewyork.us/cb4/wp-content/uploads/sites/10/2024/08/35-CHKLU-Letter-to-DCP-re-Port-Authority-Bus-Terminal-Replacement-Project.pdf>

The mitigation measures are generally described in terms of processes and not committed outcomes. And while it is difficult to anticipate all issues for such a length of time, some further consideration and certainty should be given to the remedies to those issues that have been identified.

In fact, the City Planning Commission agreed with MCB4 in their recommendation to the City Council: “The adverse environmental impacts revealed in the FEIS will be minimized or avoided to the maximum extent practicable by incorporating, as conditions to the approval, and pursuant to the Final Programmatic Agreement in the FEIS, those project components related to the environment and mitigation measures that were identified as practicable.”

The following issues are not adequately mitigated:

Construction: During the 10 years of excruciating construction, 55 buses gates will be located on the street with buses crisscrossing our streets and with 250,000 commuter crossing streets and avenues daily to reach the subway. During that period, we expect significant traffic delays and increased idling in a district with the third worst air quality in New York City. Part of project area do include environmental justice communities. And yet there is no green space being provided during construction to mitigate those factors. (the greening of the deck overs will only be done after the project is completed).

Traffic: At the completion of the project, the closure of West 41st Street (8th/9th) will cause vehicular traffic to increase by 50% on West 37th Street (8th /9th). This street leads to an entrance to the Lincoln Tunnel and is already oversaturated. It also merges with and create congestion on 9th Avenue, our main street. Due to the massive commercial towers, 39 intersections cannot and will not be mitigated.

Green space: while the Port Authority plans to deliver significant green space after the end of the project (10-15 years), they are offering to fund only a small portion of the maintenance of that space.

We understand that agencies can use mitigation to reduce environmental impacts in several ways, including compensating for an impact by replacing or providing substitute resources or environments.

Therefore, we request that the Port Authority convert small parcels of land on Dyer Avenue from West 34th to West 37th Street to green space to alleviate the traffic and air quality issues that will arise during the construction period. We believe this is the minimum required to provide relief to a population of 20,000 whose lives and health will be severely disrupted for the next 10 years.

We also ask that adequate funding for maintenance be provided for a sufficient period in order for the parks' plantings to become established and the park to be sustainable.

Sincerely,

A handwritten signature in blue ink, appearing to read 'J. Chait', is positioned above the typed name.

Jessica Chait
Chair
Manhattan Community Board 4

cc: Hon. Jerry Nadler, U.S. Congressman
Hon. Brad Hoylman, NYS Senator
Hon. Tony Simone, NYS Assembly Member
Hon. Erik Bottcher, NYC Council Member
Hon. Mark Levine, Manhattan Borough President