



CITY OF NEW YORK

**MANHATTAN COMMUNITY BOARD FOUR**

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District Manager

April 6, 2007

Mr. George D. Warrington  
Executive Director  
NJ Transit  
One Penn Plaza East, Ninth floor  
Newark, NJ 07105

**Re: Trans-Hudson Express (THE) Tunnel**

Dear Mr. Warrington:

Manhattan Community Board No. 4 congratulates NJ Transit on the completion of the Draft Environmental Impact Statement (DEIS) for new commuter rail capacity between New Jersey and Manhattan, know as Access to the Regions Core (ARC). The Board agrees that the ARC project needs to be advanced as quickly as possible.

The growth of Lincoln Tunnel vehicular traffic has severely affected the quality of life and health of residents here. The Board applauds the initiative to create a new rail link under the Hudson River between New Jersey Secaucus Junction and Penn Station, the creation of a new station north of Penn station that will connect to Penn Station and the Eighth and Sixth Avenue subway lines.

This new facility will give a suitable transit alternative to some of the 4500 drivers who commute daily through the Lincoln tunnel. The benefits in terms of reduced commute time and economic development to NYC's West Side are substantial. The DEIS estimates that the proposed project will reduce auto trips across the Hudson by 5% versus what we would see if the project is not built. We urge all involved federal, state, regional and local agencies to approve funding and move to construction as quickly as possible.

We want to note our appreciation for the level of communication and outreach the ARC project team has demonstrated thus far and for the thoroughness and high quality of the DEIS document. The DEIS appears to be thorough and contemplates squarely the challenges.

However, the following methodology deficiencies could alter significantly the scale of the impacts described in the DEIS:

- The traffic analysis uses the Hudson Yards-Number 7 Line EIS as a base and does not include a cumulative intersection impact analysis.

Community Board 4 noted at the time that the Hudson Yards EIS underestimated projected traffic impacts. The methodology considered only single intersection impact rather than cumulative intersections impact, therefore failing to recognize the spill over effects of certain level of services.

It appears that the cumulative method has not been used in the DEIS analysis either (appendix 3-3). For example, the degradation in LOS from E to F on 37<sup>th</sup> Street and Ninth Avenue could not possibly result in an improvement in LOS from E to D on 37<sup>th</sup> Street and Eighth Avenue if the cumulative method were being used.

- The Clean Air impact analysis does not use the proper benchmarks and criteria.

Short-term small particles (PM2.5) concentrations should be measured against the 35 µg/m<sup>3</sup> standard. The DEIS should use the 0.3 µg/m<sup>3</sup> criterion as well.

The DEIS should distinguish between impacts on public health and impacts on transportation conformity requirements.

- The construction phase is very challenging.

The cumulative effects of simultaneous large-scale projects are not analyzed from either a traffic or air quality standpoint.

The DEIS appropriately identifies the concentration of large scale projects actively planned or already under construction in this area: the Number 7 subway line extension; the Javits Convention Center expansion with its two hotels; the Silverstein building on Eleventh Avenue and 41<sup>st</sup> Street; the new Pennsylvania station; the conversion of the Moynihan station; the move of Madison Square Garden; six million residential and commercial square feet of development already committed in the Hudson Yards area; a building over the Port Authority bus terminal on Eighth Avenue and a bus garage over the tunnel plaza on Eleventh Avenue. Without special traffic provisions for the duration, back ups particularly those originating from Lincoln Tunnel entrances will paralyze the central business district at peak hours

As a mitigation measure, Community Board 4 requests that a policy of High Occupancy Vehicles only be implemented for most lanes of the Lincoln Tunnel during the peak construction periods. This measure was successfully applied during last year's transit strike.

- Truck route on 41<sup>st</sup> Street.

The noise section refers to trucks accessing the Lincoln Tunnel through 41<sup>st</sup> Street, although the traffic impact analysis states that other access routes will be used, and does not study the traffic impact of using 41<sup>st</sup> Street. Should construction trucks use 41<sup>st</sup> Street, it would require the reopening of 41<sup>st</sup> Street, which is currently closed. Otherwise, the construction trucks will reach the Lincoln Tunnel by turning left on 42<sup>nd</sup> Street then turning left again on Ninth Avenue - two *extremely* dangerous intersections for pedestrians.

Community Board 4 requests that all trucks from the 35<sup>th</sup> Street construction site access the Lincoln Tunnel through 34<sup>th</sup> Street, not 42<sup>nd</sup> Street.

- Traffic and Parking for construction workers on 29<sup>th</sup> - 30<sup>th</sup> Street excavation site.

The DEIS notes that 1000 workers will be employed on the site, however only 10 vehicles will be used for commuting. This is not plausible. The recently released NYC Partnership report noted that construction workers had among the highest utilization of private vehicles for commuting into NYC. The construction site is across the street from the Hudson River Park and we are concerned that the Park will become a de facto parking lot - putting joggers and bikers at risk. On the 34<sup>th</sup> Street site the DEIS does not identify the number of workers, however the number of worker trips at peak hours is also 10 and no parking option is discussed.

Community Board 4 recommends that you reevaluate these assumptions and revise the traffic and parking impacts to reflect the proper numbers. Sufficient dedicated parking should be planned for during the 80-month construction phase.

- Overall, the mitigation measures are lacking.

The DEIS describes them in such vague terms (increase in green lights, detour to other streets) that we cannot begin to comment on them. We anticipate closely collaborating with the ARC team to find and describe in details suitable mitigations to the serious impact of the project on our residents and businesses as described in the DEIS.

The DEIS identifies two major sources of impact on the community: the location of the taxi stand on the east side of Eighth Avenue and the construction phase impacts (fan plant and multiplicity of large-scale projects in the vicinity of the Lincoln Tunnel).

I. An integral part of the project, the taxi stand location on the East side of Eighth Avenue between 35<sup>th</sup> and 34<sup>th</sup> Street is problematic; it will use already congested sidewalks and will adversely impact Lincoln Tunnel access routes.

The large Hotel New Yorker is located across the avenue with buses loading and unloading passengers, and vehicles frequently double-parked. The sidewalk - currently narrow and congested - will see its Level of Service (LOS) deteriorate to E from D (on the scale of A – good to F -bad). The pedestrian crossings on Eighth Avenue at 34<sup>th</sup> Street will all have LOS of E in the PM peak hour, degraded from levels of B, C, and D today.

The DEIS notes that the following intersections will be adversely affected by the new traffic flows: • Eighth Avenue at West 30<sup>th</sup> Street, • Eighth Avenue at West 33<sup>rd</sup> Street, • Lincoln Tunnel Expressway at West 31<sup>st</sup> Street, • Ninth Avenue at West 37<sup>th</sup> Street, • Eighth Avenue at West 29<sup>th</sup> Street. All of these intersections are part of the network of “feeder streets” to the Lincoln Tunnel.

With current delays of 20 minutes or more at peak hour and significant car-pedestrian conflicts at most of these intersections, mitigation solutions must go beyond the usual traffic light adjustments.

Community Board 4 requests that the following mitigation measures be adopted:

- Relocate the taxi station on an avenue segment that has less impact on pedestrian crowding and Lincoln Tunnel access; one possibility is on the block between 33<sup>rd</sup> Street and 34<sup>th</sup> Street on Eighth Avenue, where a larger sidewalk is available and taxis can turn onto 34<sup>th</sup> Street. Community Board 4 encourages further discussions on the various options and trade-offs involved in different potential locations.

- Enlarge all sidewalks on both sides of Eighth Avenue from 34<sup>th</sup> to 42<sup>nd</sup> Streets. Although the DEIS mitigation mentions sidewalk enlargement as a mitigation measure, specific location and sizes are not spelled out. An ever-increasing volume of commuters uses these sidewalks and Community Board 4 has long requested the widening of these sidewalks. In addition, the pedestrian crossings at 34<sup>th</sup> Street and Eighth Avenue should allow much longer intervals for pedestrians to cross.
- Work with the Port Authority to reconfigure the accesses to the Lincoln Tunnel entrances in anticipation of these new patterns. Community Board 4 is on record as supporting measures that increase utilization of Lincoln Tunnel access on western entrances and discouraging use from Ninth Avenue and east of 10th Avenue. Should commuters approach the Lincoln Tunnel entrances from the west of Tenth Avenue, and east of Eleventh Avenue, congestion caused by back ups on Eighth and Ninth Avenue would be reduced. No left turn onto Ramp C should be permitted from 37<sup>th</sup> Street. The projected traffic impacts of this project reinforce the need for more aggressive measures to address that Community Board priority.
- In an area where the street space is already overcommitted, such large public transportation projects demand that street space be used more efficiently and reallocated in favor of mass transit riders.

## II. The construction phase raises many concerns.

This project will disrupt the community in major ways for up to 80 months. In addition to the cumulative effects of so many major constructions projects mentioned above, we note the following problematic areas:

- Fan Plant: Community Board 4 is pleased that NJ Transit is locating one of the fan plants on 33<sup>rd</sup> Street between Ninth Avenue and Tenth Avenue on what is currently a parking lot. We encourage you to pursue the idea of working with Port Authority and possibly the New York City's Department of Parks and Recreation to create publicly accessible open space on the adjacent site and portions of the parking lot site not needed for the fan plant. This could be a win-win arrangement that brings much-needed open space to the community.
- We note that during the construction of the Fan plants, the sidewalk in front of Saint Michael's Elementary School on 33<sup>rd</sup> Street between Ninth and Tenth Avenue will be closed for 24 months with air pollution well in excess of the EPA norm and a level of noise that exceeds New York City standards. Community Board 4 is concerned about this closure for the school's operation. The safety and health of the schoolchildren during that period is most worrisome. Perhaps the lane closure could be moved to Dyer Avenue. We look forward to hearing your proposed mitigation measures.
- Impact of Diesel trucks on the air quality during construction: The FEIS should explore requiring use of natural gas in diesel engines that cannot be retrofitted with particulate filters.

Finally, we want to reiterate that while the project is a good first step, more must be done to leverage this new infrastructure.

For example, Connectivity: the Regional Plan Association noted that the project falls short in making the rail system a more attractive alternative to the automobile for the large number of New Jersey commuters who live in Northern Jersey. Community Board 4 supports further rail investments in these communities to lower automobile congestion in our district.

The new station is expensive, disruptive and according to some - unnecessary. The Access to the East Side project linking the Long Island Railroad to Grand Central station will free up a number of Long Island railroad tracks that can be used instead of building the new station. If there is any technical merit to this claim, Community Board 4 recommends that NJ transit explore this option. It would eliminate many of the adverse impacts on the neighborhood and would free up funds to add rail service in underserved communities.

Community board 4 reiterates its support of the ARC project. We are confident that the New Jersey Transit team will continue to collaborate to find mitigation measures that will satisfy the community before the EIS is finalized.

Sincerely,



J. Lee Compton  
Chair  
Manhattan Community  
Board No. 4



Jay Marcus  
Co-Chair  
Transportation Planning  
Committee



Christine Berthet  
Co-Chair  
Transportation Planning  
Committee

cc. Mr Tom Shulze  
Electeds  
Jon Orcutt  
Jeffery Zupan  
Port Authority