



CITY OF NEW YORK

**MANHATTAN COMMUNITY BOARD FOUR**

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**JEAN-DANIEL NOLAND**  
Chair

**ROBERT J. BENFATTO, JR., ESQ.**  
District Manager

July 28, 2008

Pete Grannis, Commissioner,  
Department of Environmental Conservation  
625 Broadway  
Albany, NY 12233-1011

**Re: Comments State Implementation Plan (SIP)**

Dear Commissioner Grannis:

Manhattan Community Board 4 is pleased that the New York State Department of Environmental Conservation (DEC) is preparing a Particulate Matter 2.5 (PM2.5) State Implementation Plan (SIP) implementing measure. The state is required under the Federal Clean Air Act to develop a SIP for areas that do not comply with federal ambient air quality standards for several criteria contaminants, including PM2.5. The SIP will outline the State DEC's plans to reduce PM2.5 levels in New York City.

Our neighborhood has the third highest incidence of asthma hospitalizations in Manhattan. The proximity of the Port Authority Bus terminal, the large volume of trucks using the Lincoln Tunnel, and the many parking garages and hundreds of charter buses idling and parking illegally on our streets, make this matter crucial to our residents' health.

Community Board 4 asks that the SIP include the following provisions to address specifically the air quality and health issues in this neighborhood:

- Measurements: install both Federal Reference Method (FRM) and Speciation Trends Network (STN) monitors near the Lincoln Tunnel and the New York & New Jersey Port Authority Bus Terminal, possibly on Ninth Avenue and 41<sup>st</sup> Street. In 2006 there were 2,765,970 truck trips using the Lincoln Tunnel versus only 189,116 through the Holland Tunnel. Since 2001, all truck traffic coming from New Jersey is barred from using the Holland Tunnel, which feeds Canal Street. However the Canal Street measurement tower is still the only reference for truck traffic in Manhattan's Central Business District. In addition, the Port Authority Bus Terminal feeds a regular flow of buses over this commercial and residential avenue.
- Include the following measures in section 6.5: Weight of Evidence: Additional Measures Not Accounted for in Modeling Projections.
- Continue and strengthen the current requirement to reduce Vehicles Miles Traveled (VMT) in the Manhattan Central Business District (CBD): Off-street parking regulation. Motor vehicles play a large role in the generation of PM2.5 emissions. Constraining the number of vehicle miles traveled and traffic congestion remains the most efficient and

effective way of reducing PM2.5 levels in the CBD, where PM 2.5 concentrations are highest. The current SIP contains a parking restriction program which limits the amount of off-street parking allowed in new construction in the CBD — below 60th Street in Manhattan. Because higher parking availability induces vehicle trips, the program is an important strategy for reducing vehicle miles traveled. This program is an invaluable tool in reducing PM2.5 emissions in the midtown and downtown neighborhoods of Manhattan.

- We therefore ask you to incorporate and refer to the parking plan in the PM2.5 SIP. Parking garages should be further required to comply with LEED standards of reserved spaces for bicycles, High Occupancy Vehicles and Low emission Vehicles.
- Promote self-enforcement: our police force will never be large enough to enforce idling laws. Automated shut off mechanisms should be required on all buses, vans and trucks.
- Require the Port Authority and the City to build a charter bus garage in midtown: with the development of tourism, more and more buses bring theatergoers and tourists to midtown. However, there is no parking garage for these vehicles. As a result, they roam the streets and idle while illegally parked in front of residences. The SIP should mandate that the city build a charter bus garage in midtown to reduce buses' VMT and to eliminate their idling.
- Reopen the Holland Tunnel to local truck traffic: since 2001, the Holland tunnel has been closed to truck traffic resulting in a massive increase in trucks in the Lincoln Tunnel. It is unhealthy to concentrate so much bus, truck and car traffic in a single area, which has just been rezoned for a massive development of residences and offices. Further, each truck now must travel more miles, thru residential neighborhoods to reach its final destinations.

Generally, Community Board would like to encourage the DEC to include the following measures in the plan:

- Street level instead of roof level measurements: local associations have hired DEC accredited experts to perform measurements at the street level and observed spikes well above  $15 \mu\text{g}/\text{m}^3$ , depending on which vehicle passes by. For example, garbage trucks, which stop at every corner to empty the wastebaskets and idle for a while, delivery trucks which load and unload cause major spikes. We ask that the tests properly measure these accumulations with sidewalk sampling since actual exposures in communities is higher due to local sources of PM2.5 (traffic, burning, etc.).
- Design special incentives for freight and goods movement: the volume of long haul trucks entering the city to make multiple small deliveries is not a sustainable model. The building of the Cross Harbor Rail Freight Tunnel, which would remove one million trucks a year from City streets-5.7 million truck traffic miles from the Outer Boroughs by 2025, should be mandated. Barring thru truck traffic from entering the Manhattan street grid would be beneficial to residents while being a minor inconvenience to the trade: a detour using other bridges, which terminate on highways, would add a maximum of 15 minutes to any trip in the region. In addition, transfer stations should be mandated, so fewer trips are made with lighter, cleaner trucks to deliver multiple goods at one location. Similarly,

the multiplicity of private sanitation companies' and Department of Sanitation's garbage pick-ups at a given location every night is extremely detrimental to our health.

- Adopt innovative approaches to reduce VMT: we ask that the SIP include such strategies as congestion pricing, use of High Occupancy Vehicles lanes, reduction of car use by city employees and elected officials, elimination of parking placards and zoning incentives to encourage development close to mass transit. In addition, more road space should be diverted away from vehicles to mass transit and cyclists. Thus, protected bus and bike lanes on all Avenues and major cross-town streets should be implemented.

These comments were developed by CB4's Transportation Planning Committee. This letter has been submitted in order to meet DEC's July 17 deadline for comments, and was ratified by the Full Board July 23<sup>rd</sup>.

Sincerely,



Jean-Daniel Noland  
Chair  
Manhattan  
Community Board 4



Christine Berthet  
Co-Chair  
Transportation Planning  
Committee



Jay Marcus  
Co-Chair  
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Cc:

Speaker Christine Quinn  
Assembly member Richard Gottfried  
Senator Thomas Duane Borough  
President Scott Stringer