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Ms. Amishi Castelli  
Environmental Protection Specialist  
USDOT Federal Railroad Administration  
One Bowling Green, Suite 429  
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Mr. RJ Palladino  
Senior Program Manager  
NJ TRANSIT Capital Planning  
One Penn Plaza East - 8th Floor  
Newark, NJ 07105

**RE: Comments on Hudson Tunnel Project DEIS**

Dear Ms. Castelli and Mr. Palladino:

Manhattan Community Board 4 (CB4) is very pleased that the Hudson Tunnel Project (the Project) is advancing. It is critically needed to allow the repair of the deteriorating North River Tunnel and to provide reliable trans-Hudson rail service between New Jersey and Penn Station New York (PSNY). The issuance of the Project's Draft Environmental Impact Statement (DEIS) is a significant milestone. CB4 has a number of concerns about the DEIS, including the fan plant, Block 675, the Hudson River, the Hudson River Park, and construction impacts on our community.

**Design of Fan Plant on Block 675**

According to the DEIS, there are two potential locations for the 12<sup>th</sup> Avenue fan plant (as shown in Figure 2-10):

- (a) the southeast corner of 12<sup>th</sup> Avenue and West 30<sup>th</sup> Street, or
- (b) West 29<sup>th</sup> Street east of 12<sup>th</sup> Avenue.

From a local perspective the location of the fan plant on West 29<sup>th</sup> Street might be advantageous because it might not block views from the High Line; however this location might create further difficulties for new development on Block 675 Lot 1. The pros and cons of these two potential locations need to be fully described.

For either location, the fan facility could be either oriented vertically, requiring a foot print of approximately 120 feet by 130 feet and maximum height of 150 feet or horizontally, resulting in a lower building with a larger footprint. The illustrations of the vertical orientation are only provided in the DEIS. Illustrations of the lower building with a larger footprint should be included as well.

We are glad the design of the fan plant is to be compatible with the NYC Block 675 Planning Framework. The DEIS states: “The design of visible elements of the fan plant will be coordinated with NYCDCP.” We ask this coordination include CB4 and elected officials. The DEIS states: “The Hoboken fan plant will be designed to be compatible with the character of the surrounding area. The Project Sponsor for the Hudson Tunnel Project will coordinate with the local community and seek input in determining the appropriate design for the visible portions of the fan plant.” We request that same consultation with “the local community” be used for the 12<sup>th</sup> Avenue fan plant.

The DEIS states: “Views of the fan plant would exist from parts of the High Line that are in close proximity to the ventilation facility.” The design of the ventilation building should allow for the southern view from the High Line. The DEIS does not say if views would be “neutral” or “adverse”. If the facility blocks the view of the Statue of Liberty, significant buildings and/or other important parts of the Hudson River, then the impact would be adverse. If the vent plant is built on a slant, the views from the High Line might be preserved. This is an important issue with the local community and should be more fully discussed in the DEIS.

The DEIS states: “Plans for the Hudson Yards include buildings that are far taller than the proposed fan plant (the tallest of which would be almost 1,300 feet high) and therefore the facility would not be out of context with the bulk or height of the surrounding buildings.” It should be noted that the buildings to the east and south of Block 675 are not as high as those in Hudson Yards. The DEIS statement should be corrected to include the building heights to the east and south.

The new ventilation system is designed to bring fresh air into the tunnel passively. It also is to remove hot air from tunnel with fans during congested conditions, and can be used to exhaust hot air and smoke during emergencies. Could the exhausting of hot air and/or smoke have an adverse impact on air quality in surrounding area? There is no mention in the DEIS of the management of exhaust gasses from the ventilation facility. Where will they be directed? How will they affect pedestrians or occupants of nearby buildings? This issue should be discussed in the DEIS. We are pleased that the design of the ventilation facility is to include the coordination of agencies and the owner of the eastern section of Block 675. Early collaboration between Georgetown (the owner/developer of Lot 1), the Department of City Planning, CB4 and the Hudson Tunnel Project partners will increase the chances that the design for the ventilation building would include many of the interests of these stakeholders. We recognize that the ventilation plant will make the area it occupies unavailable to the developer, creating a hardship. However this hardship should not be used as an excuse to increase the height of the buildings on Block 675 to permit blocking of southward views of the river from the High Line’s Section 3. Building heights should not exceed those in the NYC Framework.

### **New development on Block 675**

New development on Block 675 lots can take advantage of a transfer of development rights from Hudson River Park. Monies from developers paid to Hudson River Park Trust will be used to fund capital improvements, including construction of the rest of the park, in Community District 4 (CD4). In return, transfer of development rights permits more floor area in new development.

The DEIS mentions a delay of transfer of air rights from the Hudson River Park Trust (HRP) to the developers of Block 675 lots. The DEIS estimates a seven year delay but that delay may be much longer. In consequence, a significant sum of funds needed for the improvement and build out of the park will be substantially delayed. The DEIS should more fully acknowledge these major adverse impacts on:

1. the park: the loss of funds for HRP development; and
2. the owners of Block 675 lots: the loss of revenue due to construction delay, drop in appraised value, construction noise and on-going noise from the new vent facility.

We recommend a mitigation of the loss of funding for the park, including intermediate funding prior to the delayed transfer of air rights.

### **Hudson River**

As a result of the disruption of the Hudson River's ecosystem due to the hardening of the river bottom off of the Manhattan shore, the DEIS promises monitoring of Hudson River's recovery after the construction is completed. However, there is no discussion of remedial actions that are to be taken should that recovery not be sufficient or fast enough. In fact there is no discussion of the parameters that would be used to make these determinations. CB4 requests such a discussion be included in the DEIS.

CB4 is pleased to note that the DEIS acknowledges that things can go wrong in a project of this scale but we were dismayed not to read a more complete presentation of likely scenarios should such damage occur. For example, the Project requires cutting through the Hudson River bulkhead. Boring through the historic bulkhead could leave long term damage that does not manifest for some time. How long will the bulkhead be monitored (we believe it should be monitored for not less than ten years) after the project is completed? The Project should pay for any damage to the bulkhead. Damage to or undermining of the High Line should also be carefully monitored and should damage occur, the park should be rapidly restored.

The DEIS does not describe the impacts of the Project on boats and ferries using the Hudson River at or near the construction of the Project. Will use of the river be restricted in a specific zone? A plan is needed which would identify exclusion areas for boats during construction. Will the Project monitor impacts on boats and ferries? Will it assist in establishing alternative routes?

### **Hudson River Park**

CB4 is pleased that "limited site disturbance" is a Project goal for the tunneling under Hudson River Park, but even so the public will lose the use of part of the park. The DEIS states that the Project will restore the affected area of the park in coordination with the Hudson River Park Trust (HRPT). CB4 believes that such 'restoration' should go beyond the immediate 'affected'

area, from West 28<sup>th</sup> Street to West 34<sup>th</sup> Street. Funds should be set aside for the construction of the Hudson River Park long promised to our community. Funds for construction of this park would be a small fraction of the more than \$13 billion for the construction of the tunnel. Surely completion of this park in our district is little to ask for after the disruption our neighbors will have to suffer while this needed tunnel is being constructed.

The DEIS explains that the West 30<sup>th</sup> Street heliport could be relocated to an in-water site: a floating structure between West 29<sup>th</sup> and West 32<sup>nd</sup> Streets. Much more detail about this possibility should be included in the DEIS. If the heliport is to be relocated to a floating structure, how much area should be designated for the heliport? Off shore placement of the facility will be constrained by the location of the existing and the new tunnels. There should be a map showing the possible location. The DEIS does not mention the economic impact on the heliport during construction or the loss of revenue to HRPT.

The DEIS states that if the West 30th Street heliport is not relocated from the Project site prior to construction of the Preferred Alternative, once construction of the waterfront portion of the Project alignment is complete, helicopter operations could resume and there would be no permanent impact to the heliport as a result of the Project. The DEIS does not provide in-depth analysis of the West 30th Street heliport by describing restrictions needed should it not be relocated prior to the commencement of this project. Movement of the heliport to make way for the Hudson River Park has long been promised to the community.

### **Construction**

Construction across 10<sup>th</sup> Avenue uses the cut and cover technique – staged so that some traffic lanes would be maintained at all times (although limited closures may be required during off peak periods such as nights and weekends). Traffic continues to be heavy in this area even on supposedly off peak periods. West 30<sup>th</sup> Street is heavily used for access to the Lincoln Tunnel. Maintaining as much vehicular access on West 30<sup>th</sup> Street as possible is a high priority. Construction of large high rise buildings in this area could cause additional congestion if they have not been completed by the start date of the Project.

Construction for the Project crosses 12<sup>th</sup> Avenue and trucks will use 12<sup>th</sup> Avenue for construction access. Any disruption of the traffic flow on this heavily-used highway will have serious consequences for the adjacent neighborhood. Interruption of traffic should be minimized. Extensive notification to the community and signage for drivers are imperative. Coordination with the Department of Transportation (DOT) and bus companies is essential if designated on-street bus parking spaces will have to be relocated during the Project construction period. Because so much other construction is taking place in the neighborhood, it is increasingly difficult to find on-street parking for these buses.

For tunnel alignment on Block 675 “...when the PANYNJ’s current easement on the property expires, the existing uses on the site (PANYNJ security functions and commercial bus parking) will be relocated to other sites.” Where? There are few available sites in the surrounding area. We are concerned about noise impacts on nearby park users, residents and workers. It is important that noise levels from construction be carefully monitored. MCB4 was shocked to read that blasting would end at 7 PM in New Jersey but at 10 PM New York. This is unconscionable. Blasting should not be permitted before 9AM or after 5PM in our district.

Uncovering hazardous materials is inevitable in this project. Those materials include PCBs, naturally occurring asbestos and coal ash from long gone manufactured gas plants. The DEIS promises procedures to manage those materials. CB4 was pleased to note the attentiveness to this issue in the DEIS. We believe the DEIS should pay more attention to the transparent management of hazardous material and its disposal. A mechanism of public information about this issue needs to be established.

The DEIS rightly expresses concern for air quality during construction. Air quality already is a problem in our district resulting principally from vehicular traffic to and from the Lincoln tunnel, local bus traffic and more. That said, we did not see a discussion of the use of low emissions vehicles and equipment in the completion of this project. Our concern is that low emissions equipment be used both on land and off shore for the hardening of the river bottom. In addition to what it already states, the DEIS should discuss the use of low emissions construction equipment both on shore and off shore.

**Other Comments**

CB4 understands that the Project will not result in new rail capacity until the additional Penn Station rail platforms are constructed, along with other improvements. We wish to highlight the importance of creating new bus, rail and subway capacity within CD4 to reduce the vehicular traffic and improve the air quality in the district, which is the third worst in New York City. One project that would significantly add capacity would be the 7 subway train extension to Secaucus. The only mention in the DEIS of the New York City 7 subway line is that it is 50 feet below the new Amtrak tracks leading into the Penn Station switch yard. Clearly there is a complex of issues that need resolving if the 7 train is to be extended into Secaucus. However, establishing the right-of-way and tunneling under the Hudson River represents a major expenditure. If the current project would have combined with a 7 line extension, expenses could have been reduced. The DEIS estimates the Project would create an estimated 72,000 jobs. CB4 requests serious attention be paid to hiring people from our district for a significant percent of those jobs. We encourage Project Sponsors and their contractors to post job opportunities on CB4's website.

CB4 looks forward to working with NJ Transit, USDOT, Amtrak, and the Port Authority on this very important project. As it progresses we ask that the Project partners inform CB4 on a regular basis.

Sincerely,



Delores Rubin  
Chair  
Manhattan Community Board 4



John Lee Compton, Co-Chair  
Chelsea Land Use Committee



Betty Mackintosh, Co-Chair  
Chelsea Land Use Committee

cc: Hon. Gale A. Brewer, Manhattan Borough President  
Hon. Corey Johnson, City Council

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