



CITY OF NEW YORK

MANHATTAN COMMUNITY BOARD FOUR

330 West 42nd Street, 26th floor New York, NY 10036
tel: 212-736-4536 fax: 212-947-9512
www.nyc.gov/mcb4

DELORES RUBIN
Chair

Jesse R. Bodine
District Manager

Federal Railroad Administration
1200 New Jersey Avenue, SE
Washington, DC 20590

AMTRAK
60 Massachusetts Ave, NE
Fourth Floor
Washington, DC 20002

NJ Transit Headquarters
1 Penn Plaza East
Newark, NJ 07105

Congressman Jerrold Nadler
201 Varick Street, Suite 669
New York, NY 10014

The Federal Railroad Administration (FRA) and NJ TRANSIT (NJT) are soliciting stakeholders' input on the scope of the Environmental Impact Statement (EIS) they are preparing to evaluate the Hudson Tunnel Project (the "Proposed Action" or the "Project").

Manhattan Community Board4 (CB4) requests that the proposed Project Study Area be expanded, that the study's scope encompass transportation, noise and air quality impacts from the repairs of the old tunnel and focus on the numerous cumulative effects in this area which is experiencing an extraordinary concentration of present and future projects in construction. CB4 also wants to ensure that no loss of affordable housing or public space will result from the property acquisition process.

Due the submission deadline, this resolution - adopted by the Executive Committee – is pending the full board's ratification on June 1, 2016.

Proposed Action

The Hudson Tunnel Project is intended to preserve the current functionality of the Northeast Corridor's (NEC) Hudson River rail crossing between New Jersey and New

York and strengthen the resilience of the NEC. The Project would consist of construction of a new rail tunnel with two tubes under the Hudson River, including railroad infrastructure in New Jersey and New York connecting the new rail tunnel to the existing NEC and Penn Station, and rehabilitation of the existing NEC tunnel beneath the Hudson River.

The tunnel has two separate tubes, each accommodating a single track for electrically powered trains, and extends approximately 2.5 miles from the tunnel portal in North Bergen to Penn Station. Within the New York City commuter catchment area, recent census data indicate that 12.8 percent of the workforce in Manhattan consists of residents of New Jersey and 7.2 percent of all New Jersey workers commute to Manhattan. In 2014, NJ TRANSIT carried almost 90,000 weekday passengers each day on approximately 350 trains between New York and New Jersey. Amtrak carried approximately 24,000 weekday passengers each day on more than 100 trains between New York and New Jersey.

Since the tunnel was damaged during Super storm Sandy in October 2012, it remains compromised. Although it is currently safe for use by Amtrak and NJ TRANSIT trains traveling between New Jersey and New York City and beyond, it has required emergency maintenance that disrupts service for hundreds of thousands of rail passengers throughout the region. Despite the ongoing maintenance, the damage caused by the storm continues to degrade systems and can only be addressed through a comprehensive reconstruction of the tunnel.

The Proposed Action would rehabilitate the Tunnel without disrupting existing levels of train service, and provide redundant capacity for rail service crossing the Hudson River. To perform the needed rehabilitation in the existing Tunnel, each tube of the tunnel will need to be closed for more than a year. However, rehabilitation needs to be accomplished without unacceptable reductions in weekday service. Therefore, the Proposed Action would include construction of a new tunnel with two new rail tubes beneath the Hudson River (the “Hudson Tunnel”) that can maintain the existing level of train service while the damaged tubes are taken out of service one at a time for rehabilitation.

If no new Hudson River rail crossing were provided, closing a tube of the tunnel for rehabilitation would substantially reduce the number of trains that could serve PSNY, because the single remaining tube would have to support two-way service. Once the Tunnel rehabilitation is complete, both the old and new tunnel will be in service, providing redundant capacity and increased operational flexibility for Amtrak and NJ TRANSIT.

The Scoping of the EIS study is based on the Project, including the following elements:

- A new rail tunnel beneath the Hudson River, extending from a new tunnel portal in North Bergen, New Jersey to the PSNY rail complex (as explained above). Modifications to the existing tracks in New York and New Jersey and to connect the new tunnel to the existing network
- Ventilation shaft buildings above the tunnel on both sides of the Hudson River to provide smoke ventilation during emergencies.

- Rehabilitation of the existing Tunnel, one tube at a time.
- Once the Tunnel rehabilitation is complete, both the old and new tunnel will be in service, providing redundant capacity and increased operational flexibility for Amtrak and NJ TRANSIT.
- In addition to those permanent features, the Proposed Action would involve the following types of construction activities, which will be described and evaluated in the Draft EIS:
 - Construction of new tracks along the NEC between Frank R. Lautenberg Station and the new tunnel portal.
 - Construction of the new tunnel using Tunnel Boring Machine (TBM) technology, which is conducted underground from a tunnel portal. At this time, it is anticipated that tunneling would likely occur from the New Jersey side of the new tunnel.
 - Construction staging sites near the tunnel portal and at the vent shaft site in New Jersey. These locations would be used to access the tunnel and to remove rock and soil from the tunnel while it is being bored.
 - Construction staging site at the vent shaft site in Manhattan.
 - Potential construction activities that affect the Hudson River riverbed above the tunnel location.

The EIS will consider the following resource areas for the No Action and the Build Alternatives: Transportation, Property Acquisition, Parks and Recreational Resources, Air Quality: Noise and Vibration, and Secondary and Cumulative Effects:

CB4's comments concern mostly the construction phase:

In New York the entirety of the project will take place in Manhattan District 4 (CD4) at the boundary between Chelsea and Hudson Yards. The study area is limited to 8th avenue to the east from 34th Street to the North to 30th street to the south, widening to 25th Street west of 10th Avenue. We note that the survey area is much more comprehensive in New Jersey.

Transportation:

We understand that construction staging and workers' parking will use a parking lot currently occupied by a 100-bus parking. The EIS should study the impact of the displaced buses idling and looking for inexistent parking space in streets from 23rd to 48th streets, west of 8th avenue. Should the construction staging displace other uses, we encourage you to preform a similar study.

The EIS should also study the effect of workers and equipment's driving though the residential neighborhood of Chelsea or in the truck-intense construction zone of Hudson Yards.

While the construction of the new tunnel will be done exclusively from New Jersey, it is not clear whether the repairs of the old tunnel will be performed from New Jersey exclusively or from both sides. If repairs are to be performed and serviced from the New

York side, truck traffic and routes to the Lincoln tunnel should be studied. A much larger study area should be included in New York, from 23th Street to 42nd Streets West of 8th Avenue.

Property Acquisitions

The plan describes the acquisition of properties for the installation of fan plants. Displacement of green space or low-income tenants should be avoided at all costs.

Historic Properties

The Hudson River Park bulkhead is historic (it is listed on the State and National Historic Registers) and the work will have to be compliant with the requirements of the regulatory agencies, including and especially the State Historic Preservation Office.

Parks and Recreational Resources:

In the Hudson River Park, the scope of study should include: disturbance and disposal of hazardous materials; marine and benthic (bottom-dwelling) habitat and wildlife disturbance related to alternative construction techniques.

The project will need to restore any park area, help with finishing any park areas that may be disturbed and endeavor to disturb as small an area as possible. Coordination with the bikeway will be required to minimize disturbances.

The bulkhead areas north and south of the penetration area will need to be left in good structural condition upon conclusion of the work, since once the tunnel is built, the ability to work in proximity to the tunnel will be restricted.

Air Quality:

It is not clear if the building materials of the existing tunnel included asbestos or any other dangerous materials.

CD4 has one of the highest air quality concentrations in New York City as it relates to cancer-causing micro particles. The cumulative impact of air pollution from trucks and workers traffic needs to be analyzed and mitigated. A larger study area must be considered, as air does not follow neat map boundaries.

Noise and Vibration:

Even if debris is carted out from the New Jersey side, explosions and noise can be heard 10 blocks away. Deliveries of materials are very noisy as well as create truck traffic. This also requires a large study area. Mitigation measures including “no after hours variances” will need to be contemplated.

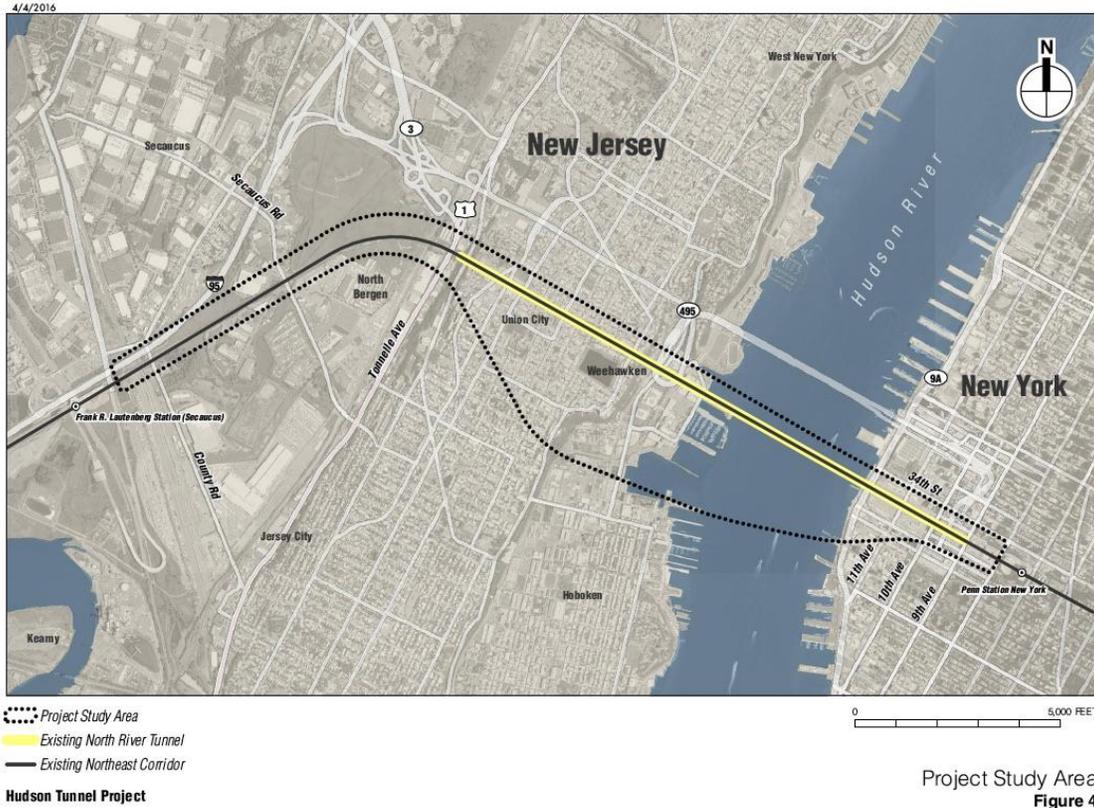
Cumulative effects:

Evaluating the cumulative effects for transportation, noise, and air quality will be critical. This project will proceed while Hudson Yards construction is still in full swing.

Currently there are already dozens of residents negatively impacted by the construction noise. This is on the top of extreme conditions due to the Lincoln Tunnel traffic and Port Authority bus terminal operation. All within 10 square blocks.

The project will possibly be concurrent with Penn Station Phase 2, Javits Center renovation and a Bus terminal relocation, each one of them being massive construction project.

We encourage NJT and Amtrak to adjust the study scope to include our recommendations.



Sincerely,

Delores Rubin
 Chair

Christine Berthet
 Co-Chair, Transportation
 Planning Committee

Ernest Modarelli
 Co-Chair, Transportation
 Planning Committee