



CITY OF NEW YORK

**MANHATTAN COMMUNITY BOARD FOUR**

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May 8, 2008

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**Re: Trans-Hudson Express (THE) Tunnel – SDEIS comments – as modified and ratified by the full board on May 7, 2008**

Manhattan Community Board 4 (CB4) appreciates the opportunity to comment on the Supplemental Draft Environmental Impact Statement (SDEIS) for new commuter rail capacity between New Jersey and Manhattan, known as Access to the Regions Core (ARC). CB4 continues to support a rail link under the Hudson; however, CB4 does not support the revised design that the SDEIS is based on unless three important elements that were included in the previous ARC design are included: a) minimum 33% upgrade capacity; b) track connectivity directly into Penn Station; and c) the potential for East Side linkage. In addition, CB4 reiterates its concern that proposed area pedestrian and traffic mitigation measures are insufficient and the funding undefined and requests that the Final EIS (FEIS) include a fully scoped mitigation plan with a defined budget. We are commenting only on impacts in Community District 4, which are those areas beginning in the middle of Eighth Avenue and going west.

**Negative impacts of the design changes:**

The plan reflected in the SDEIS is projected to reduce Manhattan bound tunnel traffic by approximately 22,000 cars per day - a 5% reduction - while the rate increase assumption for vehicles crossing the Hudson has nearly doubled from 11% to 18%. This translates into a reduction of approximately 4,900 cars per day through the Lincoln Tunnel. These benefits represent a reduction from what was projected in the original plan. In 2030, the Lincoln Tunnel will function at 105% of capacity, versus 89% in 2005.

- The new station will be a single cavern with six tracks entirely within the 34th Street right of way. Previously the station had two caverns with eight tracks (though only six were to be outfitted, leaving two for future expansion). This change eliminates the future potential increases of 33% in train volume.
- The revised plan does not include tracks going or trains going directly into Penn Station New York (PSNY). The elimination of the direct connection would preclude use of ARC tunnels for substitute service to/from PSNY in the event of an incident at PSNY or in

the existing North River tunnels. Substitute services would be operated to/from New York Penn Station Expansion (NYPSE) reducing the recoverability of the service at both Penn Station and the new station.

- All 25 trains, instead of 23 previously, go to the new station, thus increasing the pedestrian traffic by an estimated 20,400 people per day at the new station, and eliminating potential usage of future underutilized Long Island Railroad (LIRR) platforms resulting from the LIRR direct connection to Grand Central.

- The new project includes five station entrances, reduced from the originally proposed six (the entrance at the NE corner of Eighth Avenue and 34th Street has been eliminated), and three separate American Disability Act (ADA) elevator entrances. In contrast, the number of passenger-trips has increased 18%. Three potential future entrances have also been eliminated.

- The new design creates significant negative impacts for seven pedestrian areas in CD4, including sidewalks that are already narrow and congested. In contrast, the original design generated no adverse impacts for pedestrian area because it provided underground station connections. Out of seven sidewalks surveyed, five or 71% will operate at pedestrian Level of Service (LOS)<sup>1</sup> E or F, at morning and early evening peak periods. For example, the west side of the 34th Street crossing will deteriorate from an LOS of E (701 pedestrians crossing in 15 minutes) in the original DEIS to an LOS of F in the current design (1,733 pedestrians crossing in 15 minutes). During 15 minutes at peak hour, the pedestrian volume will quadruple to 4,134 pedestrians. All these intersections are on the Lincoln tunnel access routes and 34th Street is a “through” truck route to the Lincoln Tunnel. It is just not safe to add 12,395 pedestrians at peak hour to streets already plagued by a high rate of injuries and which will experience so much more congestion in the future.

- The project would generate in the A.M. and P.M. peak hours respectively - 247 and 211 taxi additional vehicle-trips, and the addition of three New York City Transit (NYCT) buses on the current route M16/M34 line on an over saturated street network. This represents a 10% increase over the DEIS. While this may seem like a relatively minor difference, given the severe existing congestion, even a small incremental increase will have severe negative traffic and pedestrian impacts. These changes cause adverse spill-over effects at five more intersections in Chelsea and Clinton on Lincoln Tunnel access routes, which, according to the DEIS, are already saturated.

- The 34th Street and Eight Avenue intersection, in particular, will now be adversely impacted from both vehicular traffic and pedestrian congestion standpoints. With the proposed implementation of dedicated bus lanes on 34th Street, it is not clear how the increase in traffic and in pedestrians will be accommodated. These adverse conditions will make matters worse at already dangerous intersections that have experienced 402

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<sup>1</sup> Level of service is a ranking system which aggregates multiple measure of capacity and comfort for pedestrians on sidewalks with A being the best and F being the worst

pedestrian/bicycle injuries and six deaths in the five years from 2001 to 2005. While we understand that this project is an important component for reducing traffic at these and other intersections, the incremental negative impacts from this project (particularly with the new design) are real, and are not sufficiently mitigated.

**Flaws in the analysis:**

- As indicated above, the SDEIS uses 2030 estimates, while the DEIS uses 2025 estimates. This makes analyzing the differences in benefits and negative impacts of the two different project designs used for these EISs particularly difficult. The DEIS data should have been converted to the Federal Transit Administration (FTA) required 2030 standard and its costs refined. For comparison purposes, the future costs of upgrading the station capacity by 33% should be illustrated in the SDEIS.
- We believe the traffic conditions (and thus the negative traffic impacts) in the area are higher than are indicated in the SDEIS, primarily from the increased traffic from the nearby Lincoln tunnel exits/entrances. The average weekday crossing at the Lincoln Tunnel was 120,829 per day in the fourth quarter of 2007, almost 9% higher than ARC 2030 no-build projection (New York Metropolitan Transportation Council (NYMTC)).<sup>2</sup> ARC discounts those trips that do not end in the Central Business District; however, all trips using the Lincoln Tunnel use our neighborhood street networks.
- The traffic analysis uses the Hudson Yards-Number 7 Line EIS as a base and does not include a cumulative intersection impact analysis. The methodology considered only single intersection impact rather than cumulative intersections impact, therefore failing to recognize the spill over effects of certain levels of services on other intersections. For example, Tenth Avenue at 36th Street will experience 818 seconds delay on the right turn and 112 seconds delay for through traffic, but at Tenth Avenue and 35th Street, just one small block away, the delay is projected to be only 39 seconds with no impact from the intersection ahead. This is simply not realistic. Because of both these factors, the magnitude of the DEIS projection that “queues and delay at the trans-Hudson crossings would increase” is not accurately reflected in the SDEIS.

**The proposed mitigation measures are inadequate and not funded. What is needed is a comprehensive mitigation plan:**

- New Jersey Transit has specifically stated that they expect New York City Department of Transportation (NYC DOT) to take on much of the mitigation of commuter/pedestrian saturation and safety issues, while the decision to build the new station in an oversaturated location and the design of the entrances is causing the pedestrian safety issues. Potential mitigations such as sidewalk expansion and traffic pattern changes, while likely the most beneficial mitigations, are not discussed.
- The mitigation measures are minimal and inadequate. The SDEIS suggests removing sidewalk furniture or signal posts to make space for approximately 3,000

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<sup>2</sup>There is no annual average kept by NYMTC re Lincoln Tunnel crossovers. However, in the third quarter of 2007 it was 121,566, almost the same as the fourth quarter. Based on past experience and statistics, though, there is every reason to believe these numbers will continue to grow over the upcoming years.

additional pedestrians per 15 minutes at two given corners already overcrowded. We do appreciate that the proposal of having several of the entrances along building lines (rather than separately on the street) and combining subway and ARC entrances together is a positive feature being pursued by New Jersey Transit (NJT) and Port Authority of New York & New Jersey (PANYNJ). However, the mitigation measures succeed in returning the LOS of only one of eight corners to D. All seven others remain at E and F.

- For traffic congestion, the SDEIS suggests changing signal timing to alleviate car delays at the tunnel ramp or at most of the impacted intersections in CD4 where Lincoln Tunnel queues are the cause of the delays in both directions. In such circumstances, changing signal timing is mostly ineffective.
- Mitigation measures, particularly in the New York portion of the project, are under-funded. The project has allocated 1% of its budget, or \$70 million, for both New Jersey and New York mitigation. However, according to the SDEIS, mitigation measures in New Jersey include acres of wetland, new osprey platforms, clean up of 33 contaminated sites, decontamination of 13 acres of landfill, and noise abatement for a number of residential buildings. A specific budget for the mitigation of roadway, subway entrances and pedestrian adverse effects in New York must be more fully developed and committed to in the FEIS.

**A proper mitigation plan should include the following actions:**

- **Creating a safe pedestrian environment for commuters arriving at the new station**

A large part of a rail connection vision we support is to modernize and grow the Penn Station area as a major regional mass transit hub. All agencies involved, including NJT, PANYNJ Authority, MTA, and DOT, should work with area residents and businesses and community boards to create a pedestrian environment that meets that vision. Incremental changes in street furniture, entrance placements, and signal timing, while beneficial are not sufficient to address basic pedestrian safety and flow needs and do not reflect the ambition and vision for a major regional transit hub.

1. Restore the entrances to the station on the northeast corner of 34th Street and Eighth Avenues. Add an entrance at the southwest corner of Eighth Avenue and 34th Street.
2. Install pedestrian crossings and traffic lights in mid-blocks on 34th Street between Eighth and Ninth Avenues.
3. Widen portions of the sidewalks on 34th Street from Seventh Avenue to Ninth Avenue, and on both sides of Eighth Avenue from 33rd to 42nd Streets. These portions should be decided based on projected peak pedestrian usage, consultation with the community, and be part of a plan that also takes into account bus route and traffic patterns.

4. Install a Barnes Dance at 34th Street and Eighth Avenue to relieve the pedestrian pressure at the intersections and allow for safe crossing without vehicle conflicts. Crossing times should be increased as well.

5. Relocate all queues to the Lincoln Tunnel approaches to the west of the tunnel entrances, so that the queues will not interfere with the commuters on foot and thus making it possible to widen the sidewalks.

6. The recently completed NYC DOT truck study makes several recommendations for reducing truck traffic and its effects in Manhattan (through increasing usage of Brooklyn/Queens connectors and other means). We encourage the NYC DOT to actively pursue those well in advance of the construction of the ARC project. The current volume of over 7,000 trucks (2006 data) through the Lincoln Tunnel (as compared to 500 through the Holland Tunnel, for example) creates much of the safety and traffic problems mentioned. The PANYNJ should explore demand management and incentives to travel at non-peak hours as a way of mitigation.

7. Coordinate pedestrian mitigation measures with the West 34<sup>th</sup> Street Bus Rapid Transit project (BRT). The 34<sup>th</sup> Street BRT project, which is beginning construction later this month, will substantially change the traffic pattern on West 34<sup>th</sup> Street and Eighth Avenue and thus pedestrian safety.

**8. Ensure the continued viable operation of properties adjacent to fan plants during construction and thereafter.** We reiterate the concerns expressed in our 2007 letter on the DEIS on the location of fan plants in our community, especially on West 33<sup>rd</sup> Street adjacent to a school. We recently learned of the possible impacts of a second fan plant on West 35<sup>th</sup> Street abutting the Manhattan Concert Hall and sound recording studio located in a historically significant building.

As stated earlier, it is imperative that NJT and the PANYNJ articulate how the 33% upgrade capacity missing from the plan will be achieved in the future. A Regional Plan should articulate how the balance of the unmet Cross Hudson demand will be addressed in the next 20 years, how the various projects intend to link to Penn Station, Grand Central Station and the East Side, and how they will share resources.

We continue to support a rail initiative that enables more commuters to switch from vehicles to mass transit to cross the Hudson. However, we do not support this design unless upgrade capacity, connectivity to Penn Station, and the potential for connectivity to the East Side are included. We also cannot support this proposal unless increased mitigation measures with a clear budget and funding are included. Without the benefit of reviewing alternative plans, the board finds this new design and the proposed pedestrian access and safety and traffic mitigations inadequate. We urge NJT and the PANYNJ to work with the community to define a preferred alternative that includes a fuller set of impact mitigations and related funding in the FEIS.

The full Board ratified the April 28, 2008 letter with the above modifications at its meeting on May 7, 2008.

Sincerely,



Jean-Daniel Noland

Chair

Manhattan Community Board 4

Cc: Mr. Richard Sarles, Executive Director, NJ Transit  
Mr. Coscia, Chair, PANYNJ  
Mr Phillip Ward, CEO, PANYNJ  
Mr. Donald Burns, Executive Director, Federal Transit Administration, Region II  
U.S. Senator Charles Schumer  
U.S. Senator Hillary Clinton  
U.S. Senator Frank Lautenberg  
U.S. Senator Robert Menendez  
Congressman Jerrold Nadler  
Governor David Patterson  
Governor Jon Corzine  
NYS Senator Tom Duane  
NYS Assemblyman Richard Gottfried  
NYC Council Speaker Christine Quinn  
Manhattan Community Board 5