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September 5, 2019

Rick Cotton  
Executive Director  
Port Authority of New York and New Jersey  
4 World Trade Center  
150 Greenwich Street, 22<sup>nd</sup> Floor  
New York, NY 10007

**Re: Port Authority Planning Level Draft Scoping Document for Public Comment**

Dear Mr. Cotton,

Manhattan Community Board 4 (MCB4 or “Board”) welcomes the opportunity to provide comments on the May 23, 2019, Bus Terminal Replacement Project (“Project”), Port Authority of New York and New Jersey Planning Level Draft Scoping Document for Public Comment (“Draft Scoping Document”).

According to the Draft Scoping Document, “The Port Authority of New York & New Jersey (PANYNJ) is proposing to replace the existing Port Authority Bus Terminal (PABT) and associated facilities, including the terminal and ramps (the “Proposed Project” or “Replacement Project”).”

With regard to the term “Replacement Project,” MCB4 notes that “expansion” is a more appropriate term than “replacement” since the main purpose of the Project, as the Scoping Document itself points out, is to increase bus terminal capacity.

The Board’s comments were informed by four MCB4 committees — Clinton/Hell’s Kitchen Land Use and Zoning Committee; Housing, Health and Human Services Committee; Transportation Planning Committee; and the Waterfront, Parks and Environment Committee — and approved by the membership at MCB4’s Full Board meeting on September 4, 2019 by a vote of 38 in favor, 0 against, 0 abstaining and 0 present but not eligible to vote. The Board’s comments follow with a summary and then with an appendix of specific responses to each area of the Draft Scoping Document.

## SUMMARY

The Purpose and Needs section (“Purpose”) of the Draft Scoping Document fails to address one of the community’s and the Board’s major concerns: curbside bus operations.

The Draft Scoping Document states that the *“primary purpose is to meet the forecasted trans Hudson commuter and intercity bus and passenger demand of buses services that operate within the PABT facility. In addition, the replacement project is needed to address capacity constraints and operational limitations of the existing PABT facility, and to improve bus storage and staging to reduce bus idling, on-street congestion and improve bus network reliability”*.

But the primary purpose of the Proposed Project specifically *excludes* providing capacity for *all* intercity long-distance buses currently operating at curbside. The fact is, buses have settled at curbside due to the lack of current capacity at the PABT and technical constraints (for instance, ramp height for double decker buses). Addressing those issues must be included as a purpose of this Project. Once these obstacles are resolved by the Project, there **will be** no difference between companies operating inside or outside the terminal. Providing sufficient capacity to absorb curbside operations is a prerequisite. Long distance intercity buses that operate at curbside must be included in the Purpose and Needs in order to eliminate curbside operations.

The Board notes that if additional capacity is provided in a separate facility, the environmental impacts (traffic and air quality) will be additional to the main facility’s impact and should be analyzed cumulatively in the environmental impact study for the Project.

Reliability is one of the most frequent complaints by commuters, according to the surveys. The Board is pleased to see its importance included in the Purpose. However, the needs, goals and objectives fail to mention it and its dependence on the road network (Lincoln Tunnel and contraflow bus lane -the XBL). They should be included throughout.

## Goals And Objectives

The Draft Scoping Document’s Goal and Objectives’ section on air quality fails to adequately address community concerns.

Our district has the third worst air quality in the City and New York City is in non-attainment of Federal guidelines for air quality. In light of this, the Draft Scoping Document’s stated goal to *“Reduce the impact of bus services on the built and natural environment”* is an inadequate one. New York City, New York State, and the Port Authority have adopted stringent air quality goals. In order to reflect these commitments, the Draft Scoping Document’s stated goal must be changed to “minimize or eliminate the impact of bus service and related facilities on the built and natural environment.” An objective should be to “match or exceed City, State, and PANYNJ standards in matters of air quality for the community”<sup>2</sup>

Since to *“provide private development opportunities on PANYNJ properties”* is a specific objective of the project, it should be associated with the stated goal to *“strive to achieve consistency with local and regional land use plans and initiatives.”* One objective under that

goal, should be to repair the damage done to the neighborhood fabric by previous PANYNJ projects and to strive to achieve local plans, detailed in the Hell's Kitchen South Coalition Neighborhood Plan<sup>1</sup>, which has been endorsed by MCB4. This Plan advocates for new uses on nine PA-owned sites including a network of local parks with the largest and active green space (at least 300' x 200'). It also calls for affordable housing and retail space.

### **Project Alternatives Screening**

MCB4 opposes the Perkins Eastman option which would use the basement of the Javits Center and require the use of Pier 76. This would result in dangerous traffic conditions on the Hudson River Greenway and prevent the creation of a long overdue Park the city had committed on Pier 76. The Build in Place alternative presents the least disruption to our community, but it fails to provide capacity for all curbside intercity buses and — as presented — does not include bus parking and staging.

If the Build in Place alternative is pursued, it must be combined with the creation of a facility that allows for bus parking and absorbs all curbside long-distance operations in West Midtown.

Additionally, although it is not part of the project, it is important that the Port Authority continue to explore additional mass transit alternatives, such as train connections, to absorb further growth, provide backup solutions, and complement the bus replacement project.

### **Environmental Analysis Framework**

MCB4 is pleased the PANYNJ has agreed to comply with City and State environmental laws. The Board notes, however, important concerns which the Analytic Framework needs to address:

#### **• Lincoln Tunnel**

Neither the project area nor the study area includes the Lincoln Tunnel. As described in the Purpose and Goals section, the Lincoln Tunnel is a critical component of the Project for it will have to absorb the increased volume of buses, which in turn will impact vehicular traffic and air quality both in the Project and related service areas. It must be included in the study area.

#### **• Parking/Staging Capacity**

The Analytic Framework must include both parking/staging capacity and capacity to absorb curbside intercity buses. Additionally, the cumulative impact of development projects resulting from value capture as described in the objectives should be included in the scenarios.

#### **• Green space**

An evaluation of green space needs in the area should be undertaken as part of the study.

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<sup>1</sup> HKSCNYC.org

- **Ventilation**

Other technical studies should evaluate what ventilation and filtering technologies are best in class to ensure significant improvements in air quality inside the facilities and in the streets and parking lots used as facilities for the PABT.

- **Infrastructure Impacts**

The impacts of the project on city infrastructure, including flooding and water accumulation in the neighborhood, should be studied.

- **Agency and Public Coordination**

Considering the massive impact of the PABT Replacement project on Community District 4 (CD4), MCB4 should be included in the list of cooperating or participating agencies. Board members have an extensive expertise about local conditions and issues that will be helpful to the Port Authority.

In the event some projects remain separate, parallel communication and decision-making processes should be implemented. Meetings would allow the public and MCB4 to engage in a meaningful dialogue with the Port Authority over projects which will have a major impact on our neighborhood. We understand Port Authority has engaged successfully and fruitfully with the community on other major projects (such as the World Trade Center). We look forward to continuing our engagement with the Port Authority on the projects in our district.

MCB4's detailed comments are included in Appendix A

## APPENDIX A

**For clarity this appendix follows the structure of the Draft Scoping Document. Quotes from the Document are in italics and MCB4 comments denoted by a bullet.**

### 1. INTRODUCTION

*The PABT serves an approximate 260,000 passengers per day and passenger activity is planned to reach 337,000 per day. if the PABT is not replaced , it would not accommodate bus demand ...the PANYNJ also conducted the Trans- Hudson Commuting Capacity Study in 2016 to examine a list of potential interstate transportation network improvements that could reduce the 2040 forecast demand for bus service to a replacement PABT.” (1.2)*

- Such a large volume of passengers begs the question of exploring appropriate technology alternatives that could bring large numbers of passengers across the river. The trans Hudson capacity study stated that a dedicated rail connection to the subway could absorb 30% of the demand.

*If the PABT is not replaced, the PABT would not accommodate forecasted bus demand, which will worsen conditions on area roadways and could result in a shift to auto creating more congested conditions on approach roadways, Hudson River crossings and Manhattan Streets. Buses comprise approximately 25 percent of peak-hour vehicles in the Lincoln Tunnel and carry approximately 90 percent of peak-hour customers (1). Most buses that use the Lincoln Tunnel are accommodated at the PABT. The PABT serves an estimated 260,000 passenger trips on a busy weekday or 23 percent of trans-Hudson trips entering or exiting the Manhattan central business district. The PABT hosts routes for daily commuters throughout New Jersey, eastern Pennsylvania, and the Lower Hudson Valley. (1.1)*

*The system of roadways, tunnel, facilities and services connecting to the Midtown core and the PABT are increasingly sensitive to disruption. Reliability will be difficult to sustain without significant new long- term investments and ongoing expenditure of resources to maintain assets during construction. (2)*

- The PABT bus performance is highly correlated to the performance of New Jersey approach roads and the Lincoln Tunnel. In September 2017, daily incidents in the tunnel caused delays, with an average duration of 45 minutes at peak hours. The “No action” alternative must include the analysis of the impact on approach roadways, Lincoln tunnel crossing, and Manhattan streets. The same elements should be studied for all alternatives as more buses may also displace vehicular traffic in the tunnel. This would have a negative effect on the tunnel and approach roadways and negatively affect air quality.

#### 1.2.1. Independent initiatives:

##### 1.2.1.1 curbside - intercity Service

*PABT connects regional commuters and intercity bus service to subway lines and bus routes. Buses comprise 25% of peak hour vehicles in the Lincoln tunnel. Most buses that use the Lincoln tunnel are accommodated at the PABT which serves commuters, intercity buses and buses which serve distant locations. The PABT does not serve many curbside intercity buses. PANYNJ believes that it could be a separate project.*

*[PABT] “also accommodates routes that provide frequent intercity services to and from locations such as upstate New York, New England, the Mid-Atlantic and Canada, as well as daily services to more remote destinations. Most buses that use the Lincoln Tunnel are accommodated at the PABT”; “The PABT does not service many intercity buses”. (1.1)*

- The PABT was originally created to consolidate all long-distance service:  
“The PABT was built to consolidate the many different private terminals spread across Manhattan... Before the PABT was constructed, there were several terminals scattered throughout Midtown Manhattan, some of which were part of hotels. The Federal Writers Project's 1940 publication of *New York: A Guide to the Empire State* lists the All-American Bus Depot on West 42<sup>nd</sup>, the Consolidated Bus Terminal on West 41<sup>st</sup>, and the Hotel Astor Bus Terminal on West 45<sup>th</sup>. The Dixie Bus Center on 42<sup>nd</sup> Street, located on the ground floor of the hotel of the same name, opened in 1930 and operated until 1959. The Baltimore & Ohio Railroad had coach service aboard a ferry to Communipaw Terminal in Jersey City that ran from an elegant bus terminal with a revolving bus platform in the Chanin Building at 42<sup>nd</sup> and Lexington. Greyhound Lines had its own facility adjacent to Pennsylvania Station and did not move into the PABT until 1963, at which time all long-distance bus service to the city was consolidated at the terminal.” (Wikipedia).

The situation today, with curbside “terminals” established at multiple locations on the West Side, is similar to the untenable conditions which the central, single PABT was built in order to correct. Curbside terminals include long distance and commuter services, as the intercity regulations group them together. In fact, the concept of “commuter” has changed, as people now commute multiple times a week from cities like Philadelphia which, in the past, would have been considered long-distance travel, not a commute.

The same companies operate both terminal and curbside services under different brands; many curbside operations are really commuter lines going to New Jersey. One out of three levels of PABT’s bus operations is dedicated to them.

The vast majority of the curbside intercity buses operating in West Midtown use the Lincoln Tunnel. (The most frequent destinations are Boston, Washington, Philadelphia, and Baltimore.)

Midtown West curbside intercity buses have located there because of the lack of capacity at the PABT. The only carrier who moved out of the PABT had been in financial difficulties for the last 20 years and did not survive even at curbside. Those intercity buses are all part of the demand that the Project is addressing. The technical restrictions (accommodating double decker buses, for instance) which also force some intercity to the

curbside will be resolved in the Project. They must be considered part of the demand and “associated facilities” mentioned above, that need to be replaced by the Project.

*“No statutory/regulatory basis: There are no governmental requirements that intercity buses use an off-street terminal (on-street facilities are approved and permitted by the New York City Department of Transportation)” (1.2.1.1).*

- There is no regulatory/governmental requirement for both New Jersey transit buses or intercity buses to use a terminal. Still, they do.

Once the terminal is upgraded, preventing an operator from leasing available gates or a company from bringing their curbside operations inside the terminal, solely because they were previously operating at curbside, would run afoul of the interstate commerce legislation.

Port Authority has completed a study to evaluate operational and legislative best practices for long distance buses in comparable cities. The study shows that other large cities are successful at corralling buses once they have space available at a terminal or in a certain area. Both NYC’s Department of Transportation and Department of City Planning<sup>2</sup> have expressed a keen interest in regrouping curbside activity into a terminal dedicated to intercity long-distance carriers.

*“Business Models: The business models of some curbside intercity carriers are inconsistent with the use of a single large terminal since their service requires frequent stops in key office markets. These operators would be unlikely to risk losing these specialty customers should they be required to board at PABT” (1.2.1.1)*

- This does not apply since none of the services within a half mile of the PABT operate with multiple stops.

#### 1.2.1.2 storage and staging

*PANYNJ proposed project includes the replacement of the Port Authority Bus Terminal (PABT) and associated facilities, including terminal and ramps, 41<sup>st</sup> street underpass (greyhound tunnel) and ventilation building, bus storage and staging in terminal and street level lots.*

- Bus storage and staging also utilize New York City public space. A significant number of curbside bus parking spaces all over the surrounding area need to be “replaced” as well.

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<sup>2</sup> <https://www1.nyc.gov/assets/planning/download/pdf/planning-level/region/pabt-replacement-071019.pdf>

*The project would provide for storage offsite and on site to provide additional efficiencies as compared to the existing terminal ... minimize impacts on city streets and assure that use of city streets by these buses would not increase.*

- The provision of storage and staging is described as one of the facilities “efficiencies” necessary to operate the terminal. It is a key component in achieving the throughput expected for the new terminal. MCB4 has long been supportive of creating a bus parking facility at Galvin Plaza to replace — but not increase — the number of buses parked in open lots and at curbside. Such a facility must be part of the Purpose and Needs as it will have a major impact not only on capacity but also on environmental factors like air quality and traffic.

The PANYNJ points out that they need to monetize some of their assets in the area in order to fund the PABT replacement. In order to do so, they must relocate spaces in the area currently used for bus parking. The construction of a parking and staging area is necessary to replace the PABT and should be part of the Purpose and Needs.

*The Port Authority has commenced a separate effort looking at storage and staging capacity, in response to community concerns relative to bus impacts on local city streets. This separate effort could result in a bus storage and staging facility of independent utility that could proceed with or without the Replacement Project.*

- This is a vital effort that should not be separate and the community and Board welcome it and the intended result. The new PABT cannot provide the expected performance without staging. In order to monetize its properties to fund the terminal project, the Port Authority must relocate buses currently parking on lots to a new facility.

*The proposed project would meet the goal of minimizing impacts on city streets from bus services operating within the replacement terminal and assuring that the use of city streets by these buses would not increase. (1.2.1.2)*

- The current number of buses using city streets is having a negative impact on the community, the air quality, and the City’s quality of life. Not increasing a negative impact does not solve the problem. It should not be the goal. The goal should be to reduce the use of city streets by these buses for emergency use only.

#### 1.2.1.3 Hell’s Kitchen South Coalition Plan

*“PANYNJ is also evaluating the Hell’s Kitchen South Coalition conceptual planning that utilizes overbuild and value capture to provide new planning and community connectivity. PANYNJ acknowledges that private development of PANYNJ properties is an opportunity to transform these properties into neighborhood assets, including street-facing retail, commercial and residential development, subway access improvements and pedestrian friendly open spaces. This “conceptual planning is not part of the proposed project and is not considered in this planning-level scoping document.” As noted, all of these suggested initiatives are fully independent and not part of the Replacement Project. The PANYNJ is exploring financing options for these initiatives, including the use of private development.”*

- As mentioned above, the funding of the PABT Replacement Project is dependent on the development of the parking lot facilities now necessary to operate the terminal. Section 1.1 states: “...use PANYNJ land available to help fund the replacement Project.” Section 2.4 states: “...provide private development opportunities on PANYNJ properties as a specific objective of the project.” If PANYNJ is relying on private development of off-site parcels which are currently part of the facilities to provide funding to complete the replacement of PABT, it is imperative that the planning of these developments is a part of this Draft Scoping Document. And the disposition and reconstruction of these parcels should be part of the Purpose and Needs.
- The HKSC plan proposes mechanisms for Value capture which is one of the objectives of the plan: Transfer of Development Rights (TDR) from the new park spaces to high density commercial sites would provide funding for the Bus Terminal Replacement Project, park spaces and community improvements. As such, the HKSC plan belongs as part of this project’s Scope.

Trade-offs between uses of parcels for bus operation versus funding/development will impact traffic and air quality. Thus, the development projects should be incorporated in the Purpose and Goals.

Note: The Neighborhood Plan does not propose *subway access improvements*.

## 2.2 PURPOSE AND NEED

*The primary purpose of the Replacement Project is to meet the forecasted trans-Hudson commuter and intercity bus and passenger demand of bus services that operate within the PABT facility. In addition, the Replacement Project is needed to address capacity constraints and operational limitations of the existing PABT facility, and to improve bus storage and staging to reduce bus idling, on-street congestion, and improve bus network reliability.*

*The PABT facility is an essential trans-Hudson transit link for travelers to Midtown Manhattan; a new facility is needed to support growth in regional travel demand with a flexible and scalable solution within a diverse network of transportation facilities and services.*

*The PABT facility is an essential trans-Hudson transit link for travelers to midtown Manhattan. ....the system of roadways, tunnel, facilities and services connecting to the midtown core and the PABT are increasingly sensitive to disruption. Reliability will be difficult to sustain without significant new long-term expenditure...*

### **2.2.1 the need to support Commuter and Intercity bus and passenger Travel Demand growth crossing the Hudson.**

*....the inadequate capacity presents on going challenges to address street level traffic congestion, delays and service reliability failures ...the trans-Hudson transportation network {...} is also currently operating at or near capacity.*

- Curbside intercity bus demand must be included in the Purpose and Need of the Project. Not only because it is part of the travel demand crossing the Hudson, but also because it is part of the on-going challenges in managing street level traffic and congestion due to the inadequate capacity of the current PABT.

The increase in capacity and reliability of the road network (Lincoln Tunnel and contraflow bus lane (the XBL) should be added as a need since a significant portion of bus delays are due to Lincoln Tunnel issues.

### **2.2.2 the need to address functional and Physical obsolescence**

*...today” PABT facility operation benefits from an operationally flexible Lincoln Tunnel*

- The customer surveys included in the appendix show that bus reliability and frequency rate high on list of concerns. The Purpose and Needs should reflect those concerns.

### **2.2.3 the need to address Bus storage and staging**

*Bus storage and staging is an important aspect of the terminal operations. More recently, bus gate reassignments, tighter regulation of the supply of buses and of bus movements inside the terminal, combined with additional surface bus parking have improved operations. Bus storage today satisfies only a portion of the needed parking for midday layover. Bus Staging is defined as the short term dwelling of buses waiting to enter the terminal typically 20 minutes to one hour.*

*The project would combine on site and off site surface lots locations. PANYNJ is considering a separate project in a separate facility to potentially increase storage and staging.*

- This facility must be part of the Purpose and Need as it satisfies a critical operational component of this Project. Without such, some alternatives would be disqualified as they will not provide enough capacity to satisfy the demand.

The Purpose and Need should reflect that all buses on lots and on curbside parking (including tour and charter buses) must be accommodated in the facility. Keeping curbside parking or bus parking lots in the midst of a residential district with schools should no longer be an option.

The Purpose and Need should also reflect that should there be any increase in parking and staging capacity, it must be provided at other locations *outside the area*.

MCB4 is pleased that the no action scenario under NEPA will be developed with and without this facility, so all impacts will be studied.

## 2.3 GOALS AND OBJECTIVES

For reference, below is the Scoping Document’s table summarizing the Project’s Goals and Objectives

GOALS	OBJECTIVES
<b>1. Improve Trans-Hudson bus operations</b>	a. Provide direct linkages to Lincoln Tunnel portals. b. Create linkages to bus storage and staging to optimize operations and minimize impact to local streets. c. Accommodate larger buses and new bus technologies.
<b>2. Improve the passenger experience within the Terminal</b>	a. Utilize sustainable building design technologies or practices that enhance environmental performance. b. Incorporate State of the Art building design, communications, and passenger amenities (e.g., gates and queuing areas, ticketing, restrooms, and waiting areas) to promote ease of use and reliability of the passenger experience. c. Foster safety and security improvements in terms of design, operations, and site location.
<b>3. Provide seamless passenger accessibility</b>	a. Maintain or improve connections to transportation systems currently accessible from PABT, in particular NYCT subway and bus, and other modes including bicycle networks, as practicable. b. Maintain or improve pedestrian accessibility between the PABT and traveler origins and destinations. c. Enhance passenger experience and flows within and around the new terminal. d. Minimize impacts to bus passengers during construction.
<b>4. Strive to achieve consistency with local and regional land use plans and initiatives</b>	a. Integrate with West Midtown development projects. b. Provide opportunity for civic space and local retail opportunities. c. Maintain regional economic vitality. d. Integrate with urban fabric and respect community character. e. Minimize Impacts to local community during construction.
<b>5. Develop a project that optimizes life-cycle costs</b>	a. Minimize capital cost. b. Minimize operating and maintenance costs. c. Create ability to temporarily close portions of the terminal during off-peak operating hours. d. Allow for phased construction and early initiation of operations. e. Minimize need to build temporary facilities. f. Minimize construction timeframe. g. Provide private development opportunities on PANYNJ properties.
<b>6. Reduce the impacts of bus services on the built and natural environment</b>	a. Reduce bus idling, unnecessary bus circulation, and traffic on local city streets. b. Reduce bus vehicle miles travelled on city streets. c. Reduce bus idling within the facility.

### ***Goal 1 - Improve trans-Hudson bus operations:***

- An objective of improving the reliability of the Lincoln Tunnel bus lanes should be added, as a significant portion of bus delays are due to Lincoln Tunnel issues.

### ***Goal 4 - Strive to achieve consistency with local and regional land use plans and initiatives***

- It is critical to acknowledge the need to repair the damage done to the neighborhood fabric by previous PANYNJ projects, as pointed up in the Hell’s Kitchen South Coalition Neighborhood Plan. Objectives to (a) Use HKS Coalition Plan as a guideline for decisions about the local context for the new PABT including providing a large green space.” and (b) integrate with urban fabric and respect community character are of vital importance and should be added.

***Goal 5 - Develop a project that optimizes life cycle costs***

- The funding of the PABT replacement is dependent on the development of parking lot facilities currently necessary to operate the terminal. Section 1.1 states“...use PANYNJ land available to help fund the replacement Project.” Section 2.4 states: “...provide private development opportunities on PANYNJ properties as a specific objective of the project.” If PANYNJ is relying on private development of off-site parcels that are currently part of the facilities , to provide funding to complete the rehabilitation of PABT, then it is imperative that the planning of these developments is a part of this scoping. The disposition and reconstruction of these parcels should be part of the Purpose and Need.

Furthermore, trade-offs between uses of parcels for bus operation versus funding/development will have an impact on traffic and air quality. Thus, the development projects should be incorporated in the Purpose and Goals.

***Goal 6 - Reduce the impact of bus services on the built and natural environment***

- This goal lacks specificity and therefore substance. The goal should be to “substantially minimize or totally eliminate the impact of the bus service on the built and natural environment.”

The Board requests that the objectives under Goal 6 be revised as follows:

To the extent it is technically feasible, eliminate the effects of bus idling on Port Authority properties or in the streets

To the extent it is technically feasible, eliminate bus circulation in the streets

To the extent it is technically feasible, eliminate traffic and pedestrian impacts on local streets from all buses, taxis and from additional bus traffic in the Lincoln Tunnel

**3. PROJECT ALTERNATIVES SCREENING**

**3.2.2.1 Preliminary Screen Part One: Fatal Flaw Analysis**

***Forecasted demand***

*PANYNJ eliminated all alternatives that could not meet the forecasted capacity for commuter buses and those long-distance buses that already operate in the bus terminal.*

- This definition ignores curbside intercity bus demand in the area. It must be modified to include all long-distance buses that operate on the West Side in the study area (West 30<sup>th</sup> to West 45<sup>th</sup> Streets, Hudson River to Fifth Avenue).

The screening should also include the need to accommodate parking and staging, which may or may not be accommodated in the same building.

***Use of private property***

- The Board applauds the use of this criteria for the selection of one or multiple sites.

3.2.2.2 Preliminary Screen Part two : other screening criteria

Goals/Objectives	Criteria
1. Improve trans-Hudson bus operations	1a. Provides similar or improved connection to existing Lincoln Tunnel portal infrastructure.  1b. Provides improved connection to an independent bus storage and staging facility or storage and staging integrated to the Terminal.
2. Improve the passenger experience within the Terminal	<i>No criteria established for this goal for the initial screening -- all alternatives are anticipated to achieve the goal/objectives.</i>
3. Provide seamless passenger accessibility	3a. Maintains level of connectivity to NYCT north-south subway (at Eighth Avenue).  3b. Provides direct accessibility to current passenger origins and destinations.
4. Strive to achieve consistency with local and regional land use plans and initiatives	<i>No criteria established for this goal for the initial screening -- all alternatives are anticipated to achieve the goal/objectives.</i>
5. Develop a project that optimizes life-cycle costs	a. Provide private development opportunities on PANYNJ properties b. <i>No other criteria established for this goal at this time. Since life-cycle costs are typically only developed based on a greater level of design, insufficient information is available on life-cycle costs to evaluate all alternatives at this time.</i>
6. Reduce the impacts of bus services on the built and natural environment	<i>No criteria established for this goal for the initial screening -- all alternatives are anticipated to achieve the goal/objectives.</i>

Source: WSP

*Of the original 13 options, three remain after the first screen: (1) Build in Place, (2) Perkins Eastman at Javits lower level , and (3) RPA intercity bus terminal under Javits.*

***(1) Build in Place:***

- While this alternative has merit, it does not provide for all the intercity bus demand needed nor for parking and staging. These needs are either not addressed or left to be addressed in separate projects. There are also concerns related to traffic and taxi queuing

on the avenues. Most importantly, how will this alternative address the very poor air quality the adjacent residential and business district experience? Without enclosing buildings, ramps, and other facilities and equipping them with adequate filtration and ventilation systems, the very poor air quality will not be meaningfully and reliably reduced. In fact, it will be made worse.

**(2) Perkins Eastman:**

This alternative would use the lower level of the Javits Center and Pier 76.

- MCB4 does not support this alternative as the Board has advocated for a large portion of Pier 76, as committed to by New York State, to be converted to a park. The commitment date is long past due and efforts are under way to relocate the tow pound which is on this site to a new location. Additionally, the use of the tow pound for bus operations would necessitate that hundreds of buses cross the Hudson River Park Greenway at all times of the day. The Greenway is the most active bike path in the United States and deadly crashes have already occurred as vehicles crossed this recreational facility. Adding hundreds of daily bus crossings is not a tenable option.

**(3) RPA**

This alternative would consolidate all long-distance Intercity buses under Javits, and refurbish the current terminal for commuter use only.

- This alternative would have the merit of accommodating all long-distance buses in one location, close to a subway station. However, it is critical to upgrade the current bus terminal to accommodate double-decker and extra-long buses.

## 4. ENVIRONMENTAL ANALYSIS FRAMEWORK

### 4.1 Regulatory requirements

*PANYNJ will comply with all City laws.*

- The Board is pleased that the PANYNJ has agreed to comply with City laws including the ULURP process for the terminal as well as the environmental goals of the “One New York” sustainability plan and the recently passed New York State law for air quality standards.

### 4.4 Methodology

#### 4.4.1 Project Study Area

- Neither the Project area nor the study area includes the Lincoln Tunnel. As such, they are disconnected from the service area (in New Jersey). The tunnel is a critical facility which will have to absorb the increased volume of buses. As such, it will impact

vehicular traffic both in the Project and service areas. It must be included in the study area.

#### 4.4.2 Analytic Framework

- Each of the scenarios (no build and build) should be considered with and without (1) a parking/staging facility; and (2) the capacity for all curbside intercity buses being provided by the project.

The development projects resulting from Value Capture as described in the objective section should be included in the scenarios.

#### 4.4.3 Technical Studies

- A significant driver of the Project's impact on air quality will likely be the ventilation and filtration systems used within the facilities, including the parking and staging station as well as the areas subject to platforming. The review should include an evaluation of what technologies are best in class in this area and the extent to which they have been successful in other cities.

With the effects of climate change and the proximity of the study area to the Hudson River, the environmental review should study the impact of the PABT development on flooding and water accumulation in the adjacent neighborhood, particularly any on impacts due to platforming performed to facilitate value capture.

### 5. AGENCY AND PUBLIC COORDINATION

#### 5.2 Agency coordinating activities

- Considering the massive impact of the project on CD4 and the extensive expertise MCB4 members have contributed, MCB4 requests to be included in the list of cooperating or participating agencies.

Sincerely,



Burt Lazarin  
Chair  
Manhattan Community Board 4



Jean-Daniel Noland  
Chair  
Clinton/Hell's Kitchen Land Use Committee



Joe Restuccia  
Co-Chair  
Housing, Health & Human Services  
Committee



Maria Ortiz  
Co-Chair  
Housing, Health & Human Services  
Committee



Christine Berthet  
Co-Chair  
Transportation Planning Committee



Dale Corvino  
Co-Chair  
Transportation Planning Committee



Lowell Kern  
Co-Chair  
Waterfront, Parks & Environment Committee



Maarten de Kadt  
Co-Chair  
Waterfront, Parks & Environment Committee

- CC: Hon. Jerrold Nadler, U.S. Congress  
Hon. Corey Johnson, Speaker, City Council  
Hon. Gale A. Brewer, Manhattan Borough President  
Hon. Brad Hoylman, New York State Senate  
Hon. Linda Rosenthal, New York State Assembly  
Hon. Richard Gottfried, New York State Assembly