U.S. DEPARTMENT OF TRANSPORTATION
FEDERAL TRANSIT ADMINISTRATION

FINDING OF NO SIGNIFICANT IMPACT

Project: Alternative Service Plan for the Canarsie Tunnel Project

Project Sponsor: Metropolitan Transportation Authority New York City Transit

Project Location: New York City, New York

INTRODUCTION

The Metropolitan Transportation Authority’s New York City Transit (MTA NYCT) will be reconstructing the Canarsie Tunnel (tunnel), which provides the sole connection between Brooklyn and Manhattan for the MTA NYCT Canarsie L subway line. The tunnel will be closed for approximately fifteen months during reconstruction, and the L train service within Manhattan and between Manhattan and Brooklyn will be suspended. MTA NYCT is proposing the implementation of an Alternative Service Plan (“ASP,” also referred to as the “Proposed Action”) to provide alternative service for as many of the approximately 275,000 daily diverted L train riders during the approximate 15-month tunnel closure as possible. The Proposed Action includes temporary subway, bus, ferry, bicycle, and pedestrian services and facilities, above and beyond what MTA NYCT would routinely provide for service diversions during major capital projects.

The Federal Transit Administration (FTA) and MTA NYCT prepared the Supplemental Environmental Assessment and Section 4(f) Review (SEA), dated July 2018, for the Canarsie Tunnel Project to supplement previous environmental analyses and decisions, pursuant to the FTA and Federal Highway Administration (FHWA) National Environmental Policy Act (NEPA) implementing regulations at 23 C.F.R. § 771.129 and 771.130. The SEA was prepared in accordance with NEPA and the FTA and FHWA NEPA implementing regulations at 23 C.F.R. Part 771. The SEA was also prepared in accordance with other applicable federal laws including but not limited to Section 4(f) of the Department of Transportation Act of 1966 and its implementing regulations at 23 C.F.R. Part 774, Section 106 of the National Historic Preservation Act of 1966 and its implementing regulations at 36 C.F.R. Part 800, Executive Order 12898 on Environmental Justice, Executive Order 11988 on Floodplain Management, and U.S. Department of Transportation Order 5650.02 on Floodplain Management and Protection.

The SEA presents an analysis of the potential environmental impacts of a full tunnel closure with alternate service routinely provided by the MTA NYCT (No Action Alternative) and the potential environmental impacts of a full tunnel closure with the proposed ASP (Proposed Action). At the time of FTA’s previous environmental reviews, the magnitude of the potential impacts was not known because of the preliminary nature of both the tunnel closure construction options and alternative service plan.

Based on the July 2018 SEA, review of public and agency comments (Attachment A), revised measures to minimize harm (Attachment B), and proposed modifications and clarifications (Attachment C), FTA finds, in accordance with 23 C.F.R. § 771.121 that the Proposed Action, compared to the No Action Alternative, will result in no significant impact on the human and natural environment. This Finding of
September 13, 2018

Ms. Veronique “Ronnie” Hakim
Managing Director
Metropolitan Transportation Authority
2 Broadway
New York, NY 10004

Subject: FONSI for Metropolitan Transportation Authority New York City Transit Alternative Service Plan for the Canarsie Tunnel Project

Dear Ms. Hakim:

The Federal Transit Administration (FTA) has completed its review of the Supplemental Environmental Assessment and Section 4(f) Review (SEA) prepared for the Canarsie Tunnel Project, dated July 2018. Based on our review of the July 2018 SEA, which included analysis pursuant to Section 106 of the National Historic Preservation Act and Section 4(f) of the Department of Transportation Act, and in accordance with 23 C.F.R. § 771.121, FTA has issued a Finding of No Significant Impact (FONSI) for the Canarsie Tunnel Project Alternative Service Plan (ASP), as described in the SEA and the FONSI. Enclosed please find a copy of the FONSI for your records.

As noted in the FONSI, please consider repairing Union Square West, which is part of the Union Square National Historic Landmark, with replacement concrete and granite pavers either in preparation for the temporary ASP or after the temporary features of the ASP are no longer needed and removed. The current plan, as described in the SEA, is to replace the existing concrete and granite pavers with asphalt for the ASP.

The Metropolitan Transportation Authority New York City Transit (MTA NYCT) must send a notice of availability of the FONSI to all consulting parties and affected units of State and local government, and MTA NYCT must make the FONSI available upon request by the public in accordance with 23 C.F.R. § 771.121(b). Please post the FONSI and supporting documents, including the SEA, to the project’s website until construction is complete and the Canarsie L Line is back in full operating service.

Please be aware that MTA NYCT must carry out the ASP in accordance with this environmental record, including the July 2018 SEA and the FONSI. If there are any changes to the Canarsie Tunnel Project, including the ASP, MTA must notify FTA, in writing, to determine whether additional environmental studies or analysis are needed. In the event of a change to the Canarsie Tunnel Project, including the ASP, that requires additional environmental studies or analysis, MTA may not implement the change until it has written approval from FTA. If you have any questions regarding this matter, please contact Nina Chung at (212) 668-2180.

Sincerely,

[Signature]

Stephen Goodman, P.E.
Regional Administrator

Enclosure: FONSI
No Significant Impact (FONSI), including Attachments and the SEA, provides FTA’s analysis under NEPA pursuant to 23 C.F.R. § 771.130.

**PROJECT PURPOSE AND NEED**

The purpose of the Proposed Action is to provide transportation alternatives to the greatest number of diverted L train riders during the approximate 15-month full tunnel closure, to the maximum extent possible. Temporary closure of the tunnel will result in disruption to nearly 400,000 daily L train riders. Approximately 275,000 of these riders will need to divert to other transportation options: the 225,000 riders who use the L train to connect between Brooklyn and Manhattan and 50,000 who use the L train only in Manhattan.

**PROJECT BACKGROUND**

The Canarsie Tunnel, located below the East River, consists of two (2) cast-iron tubes, each with one track. The interior of the tunnel was flooded with corrosive saltwater during Hurricane Sandy in 2012 resulting in extensive damage. A comprehensive reconstruction of the tunnel is needed.

In 2015, FTA issued Categorical Exclusion findings under the NEPA implementing regulations at 23 C.F.R. §§ 771.118(c) for Canarsie Tunnel Restoration and Resiliency projects, and in 2016, FTA issued a Categorical Exclusion finding under the NEPA implementing regulations at 23 C.F.R. §§ 771.118(d) for the Canarsie Tunnel Core Capacity and State of Good Repair project. While the rehabilitation activity is the reason for the need to close the tunnel, the other previously approved activities would take advantage of a tunnel closure. Therefore, collectively, the 2015 and 2016 activities are referred to as the Canarsie Tunnel Project or the approved Project for purposes of environmental review.

At the time of FTA’s 2015 and 2016 NEPA reviews, the Canarsie Tunnel Project included preliminary tunnel closure construction options and a preliminary concept of an alternative service plan. The preliminary tunnel closure construction options included full-tunnel closure with both tracks closed and partial-tunnel closure with one track closed at a time. Based on public input, additional design and engineering studies, and the critical need to reconstruct the tunnel as expeditiously as possible to minimize risk to safety, MTA NYCT determined that the full-tunnel closure construction approach was the preferred approach to reconstruct the tunnel (MTA NYCT June 2018 Alternatives Analysis presented in Appendix A of the SEA). Critical assets in the tunnel are severely deteriorated. The longer the compromised elements stay in service, the greater the possibility of their failure. There have been several failures already including a duct bank collapse in 2013 and a fire due to damaged power cables in 2016. Over time, these failures will become more severe and more frequent. Therefore, the construction approach for the tunnel repair work under both the No Action and Proposed Action includes full-tunnel closure. In addition, since FTA’s 2015 and 2016 NEPA reviews, MTA NYCT, in coordination with the New York City Department of Transportation (NYCDOT), has further developed and refined the alternative service plan.

In light of MTA NYCT’s decision to shutdown the Canarsie tunnel for approximately fifteen months, and given the development of MTA NYCT’s ASP, FTA decided to re-evaluate its prior environmental reviews pursuant to 23 C.F.R. § 771.129 to determine whether it needs to supplement the environmental record to address any potential environmental impacts of the full tunnel closure and refined ASP which were not previously contemplated. The significance of potential environmental impacts of the full tunnel closure was not yet clearly established. Therefore, the SEA presents the potential impacts of a full tunnel closure with alternative service routinely provided by the MTA NYCT as the No Action Alternative.
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The proposed ASP was developed to maximize opportunities to provide temporary services in coordination with other ongoing transportation improvements while meeting MTA’s August 2010 Board-approved Service Loading Guidelines1 (MTA Guidelines) to the extent possible. MTA Guidelines are used to develop and maintain comprehensive, cost-efficient transit service that meets the needs of those who live, work, and travel in New York City. These Guidelines provide a structure for consistent and fair evaluation of existing and proposed services by determining when, where, and how frequently service should be offered.

ANALYTICAL FRAMEWORK OF SEA

The SEA presents the potential environmental impacts of two alternatives: (1) the No Action Alternative and (2) the Proposed Action Alternative. Both Alternatives include the full closure of the tunnel with complete suspension of L train service within Manhattan and between Manhattan and Brooklyn for approximately fifteen months. The analytical framework of the SEA assumed that the approved Project as well as existing planned transportation projects (Existing Planned Projects, as described in Chapter 5.1.2 and Appendix B of the SEA) will occur with or without the proposed ASP and compared the impacts of the Proposed Action (proposed ASP) with those from the No Action Alternative. The Existing Planned Projects are used as a baseline for analysis.

NO ACTION

The No Action Alternative includes subway and bus service enhancements to accommodate L train riders at a level routinely provided by the MTA NYCT during major capital projects. Generally, for subway service disruptions, MTA NYCT provides one or more of the following, consistent with the MTA Guidelines: additional service on adjacent and intersecting subway lines, substitute bus service, and/or increased service on existing bus routes. To the extent possible, the routes for substitute and increased bus service typically follow the subway route that is disrupted or connect to a nearby alternate subway route. These types of services have typically been adequate for providing diverted riders with alternative services and that meet MTA Guidelines; however, for the Canarsie Tunnel Project, these services would be inadequate, not meet the purpose and need of the project, and be inconsistent with the MTA Guidelines.

Consistent with the Guidelines, the No Action Alternative includes increasing subway service on adjacent and intersecting lines to the extent feasible and increasing bus service on the B39, M14A, and M14D routes. Details of the No Action increased subway and bus service are described in Table 1 of the SEA. It also includes existing planned transportation projects (Existing Planned Projects) as described in Chapter 5.1.2 and Appendix B of the SEA, that are expected to be in place with or without the proposed ASP, including bike improvements, pedestrian safety improvements, procurement of new buses, and subway station improvements.

The following subway service modifications are common to both the No Action Alternative and Proposed Action: operate the L train between Bedford Avenue and Canarsie-Rockaway Parkway; increase peak M and G train service and off-peak A, E, F, G, J, M, and 7 train service; reduce peak R train (Queens Boulevard) and J train service in order to accommodate increased M train frequencies; lengthen C and G trains; and institute free MetroCard transfers between certain train lines as noted on page 13 of the SEA.

PROPOSED ACTION

The Proposed Action includes the implementation of the proposed ASP, which includes temporary subway, bus, ferry, bicycle, and pedestrian facilities above and beyond what is routinely provided during planned, temporary service suspensions. The proposed ASP has been developed in coordination with NYCDOT to provide transit and mobility options to L train riders to the greatest extent practicable during the temporary 15-month service suspension.

Bus enhancements (beyond substitute bus service), ferry service, and bicycle and pedestrian enhancements are considered above and beyond what is routinely provided. These elements of the proposed ASP are described below:

- **Subway:** The proposed ASP subway service plan would be identical to the subway service modifications described above under the No Action Alternative with the addition of permanent improvements, including adding turnstile capacity at Nassau Avenue (G Line), Metropolitan Avenue (G Line), and Lorimer Street (L Line); reopening of the Hope Street station entrance at Metropolitan Avenue (G Line); and reopening multiple station entrances at Hewes Street (J/M/Z Lines).

- **Bus:** The proposed ASP would add bus service along the L train route in the form of temporary interborough bus service (four routes) and enhanced 14th Street select bus service (SBS). The Williamsburg Bridge would be reserved for buses, trucks, and high-occupancy vehicles with three or more people (HOV3+) from 5:00 am to 10:00 pm, 7 days per week. Bus priority lanes and operational restrictions for cars and trucks would be applied on 14th Street from 5:00 am to 10:00 pm, 7 days per week. A temporary bus terminal would be constructed at Stuyvesant Cove to facilitate connections between the temporary ferry service and M14 SBS. In addition, there would be service increases to local bus routes. MTA NYCT would acquire leases for existing parking facilities for use as temporary overnight bus storage. As a result of public comments on the SEA, MTA NYCT proposes to include the following new element to the ASP: a L5 bus service to connect Canarsie neighborhood with the Crown Heights-Utica Avenue 3/4 trains.

- **Ferry:** The proposed ASP would include a temporary ferry service between North Williamsburg and Stuyvesant Cove with approximately eight trips during the peak hour. A temporary landing would also be constructed on Empire Pier, which is immediately north of the existing North Williamsburg landings.

- **Bicycles:** The proposed ASP would include temporary implementation of one-way bike lanes on 12th and 13th Streets. NYCDOT also would add temporary high capacity valet bike parking, temporary upgrades to a Grand Street bike lane, a temporary bike lane along Union Square West, and the temporary installation of bike parking sleds within the existing roadbed.

- **Pedestrian:** The proposed ASP would include temporary vehicle restrictions on Union Square West and University Place and temporary bus stop curbs and sidewalk extensions on 14th Street and Houston Street.

After reconstruction of the tunnel is complete and L train service resumes, MTA NYCT, in coordination with NYCDOT, will ensure removal of all temporary ASP elements within approximately four months of the re-opening of the tunnel (or as weather conditions permit), unless additional planning, agency coordination, public outreach, and/or appropriate environmental analysis is undertaken as part of separate independent project(s).
The following permanent elements would remain in place:

- station circulation improvements at Nassau St (G Line), Metropolitan Av (G Line), Lorimer St (L Line), and Hewes St (J/M/Z Lines);
- roadway resurfacing; and
- potentially fare machine/totems on 14th Street.

The fare machines and totems may be evaluated at a later point as part of a permanent M14SBS route that would be separate and independent of the M14SBS implemented as part of the ASP should MTA and NYCDOT decide to undertake a permanent project. However, if they are not used for the permanent M14SBS, they will be removed within approximately four months of completion of the ASP.

**Planning and Development of the Proposed Action**

Consistent with the MTA Guidelines to the extent operationally possible, the ASP was established by identifying user demand for the different transportation modes of the ASP. It also included the development and evaluation of design and operating options to optimize the effectiveness of the ASP, including the evaluation of design options for the following:

- Williamsburg Bridge lane management: Design options included adding 80 buses in the peak period (No Bus Priority Treatment Option); reserving the outer deck of the bridge for buses and trucks (Option A); reserving the outer deck for buses, trucks and HOV3+ (Option B); and reserving entire bridge for buses, trucks, and HOV3+ (Option C, the ASP design); as well as options for the approach streets to the bridge;

- 14th Street SBS busway design configuration: Design and operating options included Additional Buses Only Option, an SBS Option, a Short Busway Option, and a Busway Option (the ASP design) as described on page 24 of SEA; and

- Pedestrian and bike improvements: Design options included a two-way bicycle corridor along 13th Street, or a pair of one-way bicycle lanes on 12th and 13th Street, University Place, and Union Square West, including widened walkways and bike lanes.

Overall, the proposed ASP was developed to provide transit service options aimed at reducing demand for subway lines projected to be overcrowded in the No Action Alternative and to provide temporary service options for riders not well served by subway service during the tunnel closure period.

**AGENCY COORDINATION AND PUBLIC OPPORTUNITY TO COMMENT**

**Agency Coordination**

During the development of the proposed ASP and as described in the SEA, FTA and MTA NYCT coordinated with various local, state, and federal agencies. Coordination with those agencies will continue throughout the construction and operation phases to ensure that any measures to minimize harm are appropriately implemented.

A summary of additional agency coordination subsequent to the publication of the SEA is provided below. Attachment A of this FONSI includes copies of the agency correspondence referenced below.
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USACE A Section 10 of Rivers and Harbor Act of 1889 permit application to the U.S. Army Corps of Engineer (USACE) for the construction of the temporary ferry service was transmitted to USACE on August 9, 2018. This was a joint permit application to the New York State Department of Environmental Conservation (NYSDEC). MTA NYCT will adhere to all conditions in the permit when issued. Coordination with USACE will occur during installation and operations and will cease after the satisfactory removal of the temporary ferry infrastructure.

NYSDOS On July 23, 2018, the New York State Department of State (NYSDOS) issued a letter noting that the proposed ASP meets its general consistency concurrence criteria. In adherence to the conditions of the NYSDOS letter, MTA NYCT transmitted to NYSDOS a copy of the USACE/NYSDEC Joint Permit Application dated August 9, 2018.

NMFS/NOAA In a letter dated August 23, 2018, the National Marine Fisheries Service (NMFS), an agency of National Oceanic and Atmospheric Administration (NOAA), provided concurrence on FTA’s conclusion that the proposed Project is not likely to adversely affect any NMFS Endangered Species Act (ESA) species or designated critical habitat. Therefore, no further consultation pursuant to Section 7 of ESA is required. MTA NYCT will adhere to the recommendations of NOAA as required by the USACE. MTA NYCT will support FTA’s continuing coordination with NOAA throughout the life of the project until the satisfactory removal of the temporary ferry infrastructure is completed.

USCG In a letter, dated July 23, 2018, the U.S. Coast Guard’s (USCG) Bridge Program offered comments related to any bridge improvements over any navigable waterway, including the East River. Regarding the new proposed ferry service, coordination with USCG was initiated by MTA NYCT on June 14, 2018, and will continue with the selected ferry operator for the duration of the temporary ferry service. MTA NYCT will coordinate with NYCEDC to ensure that the designated ferry operator complies with USCG requirements for the installation, operations, and cessation of the North Williamsburg to Stuyvesant Cove Temporary Ferry Service.

NYCEDC In a letter dated August 22, 2018, the New York City Economic Development Corporation (NYCEDC) concurred that use of Stuyvesant Cove Park is temporary and will not constitute a significant impact, and that a Section 4(f) de minimis impact finding is appropriate. MTA NYCT will adhere to all conditions stipulated in the NYCEDC letter of concurrence. Coordination will continue throughout MTA NYCT’s use of the park until a satisfactory restoration of the park is completed.

US DOI FTA coordinated with the U.S. Department of Interior (DOI) regarding the use of the Union Square National Historic Landmark. DOI notified FTA in a letter dated August 9, 2018, that it has no comments on the project.

NYCDPR In a letter dated September 4, 2018, the New York City Department of Parks and Recreation (NYCDPR) concurred that use of the North 5th Street Pier and Park are temporary, will not constitute a significant impact, and that a Section 4(f) de minimis impact finding is appropriate. MTA NYCT will adhere to all conditions stipulated in the NYCDPR letter of concurrence. Coordination will continue throughout MTA NYCT’s use of the park until a satisfactory restoration of the park is completed.

NYCDOT In a letter dated August 27, 2018, NYCDOT provided its commitment to implement the ASP elements attributed to NYCDOT as described in the July 2018 SEA, provided that MTA NYCT assists NYCDOT with certain construction assistance described in the letter.
Public Outreach

The public comment period for the SEA extended from July 20, 2018 to August 19, 2018. In addition to oral testimony at the August 6, 2018 public meeting, comments also were submitted by letter, online through a link on MTA’s homepage, comment cards at the public meeting, and emails. See Attachment A for a summary of the comments on the July 2018 SEA and responses to those comments. A summary of the public outreach is provided below.

Public Outreach Prior to July 2018 SEA

Starting in May 2016, MTA NYCT undertook extensive public outreach activities for ASP development. Specifically, outreach included web-based information and comment opportunities, community meetings, town hall meetings, and briefings. MTA NYCT and NYCDOT have maintained open communications with elected officials, government agencies, advocacy groups, and key stakeholders.

This early coordination informed the development of the ASP. Some examples are provided below:

- Following public input from The L Coalition and Carolyn Maloney’s office, the L4 interborough shuttle route was added to provide direct bus access between the Bedford Avenue area and 1st Avenue/14th Street. This route also diverts some buses from the Kenmare/Soho loop much to the request by the community in the Kenmare/Soho loop vicinity.

- In response to community input at meetings in 2018, a bus stop was added on the Grand Street L bus routes at Union Avenue.

- NYCDOT made changes to bike routes and access to 14th Street following concerns from residents in the area. Vehicles will be allowed on 14th Street to pick up and drop off residents as long as they make the first right turn-off after pick-up or drop-off is made. Additionally, the previously planned two-way bike lane on 13th Street was changed to be two separate one-way routes on 12th and 13th Streets. This change was made after residents raised concerns for children’s safety near schools and increased traffic from the narrowed streets.

- As a result of air quality concerns raised by the community, MTA NYCT included electric and hybrid-electric buses as part of the temporary ASP fleet of buses. Although fifteen electric buses were planned to be deployed for the temporary M14 SBS service at the start of the ASP in April 2019, MTA NYCT recently notified the FTA by letter dated August 23, 2018, that the deployment will be delayed until the fourth quarter of calendar year 2019. MTA added five electric buses and ten hybrid-electric buses to the fleet of Brooklyn-based interborough buses that will be deployed at the start of the ASP. Therefore, there will be a total of twenty electric buses (five to be deployed at the start of the ASP and fifteen to be deployed by the fourth quarter of calendar year 2019) and ten hybrid-electric buses as part of the proposed ASP.

Public Outreach for July 2018 SEA

On July 20, 2018, the Notice of Availability of the SEA, including notice of the public comment period and notice of the August 6, 2018 public meeting, was posted on the homepage of MTA’s website. The
notice also was emailed to the following elected officials and community boards in Brooklyn, Queens, and Manhattan:

**Congress Members:** Nydia Velazquez, Jerrold Nadler, Carolyn Maloney, Hakeem Jeffries, Yvette Clarke, and Grace Meng.

**Senators:** Brian Kavanagh, Brad Hoylman, Liz Krueger, Martin Dilan, Roxanne Persaud, Jesse Hamilton, Velmanette Montgomery, Brian Kavanagh, Michael Gianaris, and Martin Dilan.

**Borough Presidents:** Eric Adams, Melinda Katz, and Gale Brewer.

**Assembly Members:** Joseph Lentol, Maritza Davila, Erik Dilan, Latrice Walker, Nick Perry, Jaime Williams, Charles Barron, Michael Miller, Cathy Nolan, Deborah Glick, Harvey Epstein, Richard Gottfried, and Yuh-Line Niou.

**Council Members:** Rosie Mendez, Corey Johnson, Keith Powers, Margaret Chin, Steve Levin, Antonio Reynoso, Rafael Espinal, Inez Barron, and Robert Holden.

**Brooklyn Community Boards (CB):** CB 1, CB 4, CB 5, CB 16, and CB 18.

**Manhattan Community Boards:** CB 2, CB 3, CB 4, CB 5, and CB 6.

**Queens Community Board:** CB 5.

The notice also was advertised in the following newspapers on the corresponding dates:

- **Sing Tao**, July 24, 2018.

On July 20, 2018, printed copies of the SEA were delivered to multiple locations in Brooklyn, Manhattan, and Queens where the public could view the document.

Public outreach for the July 2018 SEA included a public meeting. The meeting was held to provide information about the Proposed Action to the public and solicit comments on the proposed ASP and findings of the July 2018 SEA. The meeting was held during the public comment period on August 6, 2018, at MTA Headquarters located at 2 Broadway, New York, New York. The public was invited to make oral comments during the meeting and provide written comments during the comment period through letters, emails, or online MTA website submissions.

The public comment period for the SEA extended from July 20, 2018 to August 19, 2018. There were 308 commenter and approximately 313 comments. FTA and MTA NYCT reviewed, considered, and responds to all relevant public comments, including all relevant late-filed comments that were germane to the Proposed Action. See Attachment A for a summary of the agency and public comments on the July 2018 SEA and responses to those comments. FTA and MTA NYCT does not respond to comments that were not germane to the Proposed Action. Based on agency and public comments during the public viewing period of the SEA, MTA NYCT, in coordination with NYCDOT, proposes to include the following new element to the ASP:

- L5 bus service to connect Canarsie with the Crown Heights-Utica Avenue 3/4 trains.
In addition, based on review of public comments, MTA NYCT added a new measure to minimize harm:

- MTA NYCT, in coordination with NYCDOT, commits to work with the New York Police Department (NYPD) on enforcement of traffic regulations.

This was not presented in the SEA and has been included in Attachment B.

Attachment C provides a summary of the changes noted above. Attachment C also summarizes clarifications and corrections made to information presented in the SEA as well as additional refinements made to the proposed ASP based on project development. The summary environmental analysis presented below reflects the proposed modifications, refinements, and clarifications as described in Attachment C.

**SUMMARY ANALYSIS**

The SEA presented analysis of potential impacts of two alternatives: (1) the No Action Alternative and (2) the Proposed Action. The analytical framework of the SEA assumed that the approved Project will occur with or without the Proposed Action and compared the impacts of the Proposed Action with those from the No Action Alternative.

The following eleven environmental issue areas were analyzed: (1) Transportation, (2) Air Quality, (3) Biological Resources, (4) Hazardous Materials, (5) Historic, Cultural, and Archaeological Resources, (6) Noise and Vibration, (7) Social Resources and Economic Impacts, (8) Water Resources, (9) Construction, (10) Greenhouse Gas Emissions, and (11) Environmental Justice. FTA and MTA NYCT also completed an assessment of Section 4(f) of the Department of Transportation Act. Based on the largely temporary implementation of the proposed ASP during the tunnel closure period, and the limited changes to the existing environmental setting, the SEA did not examine the following five resources: (1) Energy and Natural Resources, (2) Geology and Soils, (3) Utilities, (4) Visual Resources and Aesthetics, and (5) Section 6(f) of the Land and Water Conservation Act.

As previously noted, the analytical framework of the SEA assumed that the approved Project as well as Existing Planned Projects, which is used as a baseline for analysis, will occur with or without the proposed ASP and compared the impacts of the Proposed Action (proposed ASP) with those from the No Action Alternative. Below is a summary of the environmental impact analysis of those areas analyzed for the No Action and Proposed Action in comparison to the No Action.

**1. TRANSPORTATION**

Both the No Action and Proposed Action alternatives would result in transportation impacts. Compared to the No Action Alternative, the Proposed Action would result in temporary beneficial impacts to subway, bus, traffic, pedestrian, and bicycle conditions. The ASP would result in substantial improvements in the overall travel times compared with the No Action Alternative. Under the Proposed Action, while there will be adverse parking impacts, the temporary displacement of 1,075 on-street and 220 off-street spaces is not considered significant because of the temporary nature of the impact and considering the goal of providing adequate, daily transit access for 275,000 diverted transit riders. To minimize transportation impacts, the following measures to minimize harm have been incorporated into the Proposed Action:

- MTA NYCT will commit to operating subway service on alternate subway lines in the robust service pattern described in the SEA so that as many diverted L train customers can be accommodated within the subway system as possible, to ensure that the effect of the Proposed Action on traffic flow is not significant.
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- Camera enforcement of bus lanes will be implemented on 14th Street and Grand Street to ensure that bus lanes function efficiently. Please note that this measure was not presented in the SEA, and numerous public comments regarding support of camera enforcement were received.

- Once the proposed ASP is implemented, MTA NYCT, in coordination with NYCDOT, will monitor traffic conditions in a dynamic and responsive manner. This includes potentially adjusting traffic approaches and adjusting restriction times on Williamsburg Bridge and on 14th Street, as well as other adjustments as needed, to optimize performance during the anticipated 15-month construction schedule to minimize impacts.

- MTA NYCT will coordinate with NYCDOT to adhere to all local, state, and federal requirements related to the reconfiguration of the surface transportation infrastructure, monitor and ensure that all elements of the ASP are functioning as intended and to maintain the elements of the ASP as needed, and enforce traffic rules and new traffic patterns.

- MTA NYCT will work with NYCDOT to ensure that NYCDOT’s Freight Mobility Group continues its regular, ongoing outreach to representatives of the trucking industry to educate commercial drivers of their appropriate route options. Trucks diverted off of 14th Street due to the busway will need to find other permitted routes north or south of the corridor and use that route to get as close as possible to their delivery locations. This commitment also is a measure to minimize air quality impacts.

- MTA NYCT, in coordination with NYCDOT, will notify the NYPD Transportation Division’s Truck Enforcement Unit of proposed routing changes associated with the proposed ASP and coordinate with them on education and enforcement events. This commitment also is a measure to minimize air quality impacts.

- MTA NYCT, in coordination with NYCDOT, will work with NYPD to enforce traffic regulations. This measure was added as a result of public comments received on the SEA.

**No Action**

**Subway**

There would be increased ridership on adjacent subway lines resulting in temporary increase in peak loads that would exceed MTA Guidelines on the J, M and E Lines. Train loads that exceed MTA NYCT’s maximum loading guideline capacity result in extremely overcrowded individual trains. For example, there would be extreme crowding on the M Line at a level that would be very difficult to operate reliably, which would generate further crowding and reduce train throughput and capacity. Extreme overcrowding on trains and platforms, which could increase the likelihood of subway delays, would result in delays throughout the system. The No Action Alternative would result in adverse impacts to subway operations and to subway riders.

**Bus**

Crosstown 14th Street passengers would double and there would be slow travel times on 14th Street. Additional buses added to a cross street with already high levels of congestion would provide little additional capacity to absorb the dramatic increase in demand for bus service in the No Action Alternative. There would be a notable decline in the transit mobility for the easternmost residential areas around Stuyvesant Town where residents would mostly be anticipated to walk upwards of a mile to connect with the Union Square subway station. The Brooklyn-Manhattan bus service, which would be increased from 2 buses to 12 buses per hour in each direction in the morning peak, would be expected to be slower than the current travel times experienced in the AM peak hour.
due to additional traffic on Williamsburg Bridge. The increased bus service between Brooklyn and Manhattan and on 14th Street in Manhattan likely would not capture any meaningful number of L train riders.

Traffic

Traffic conditions along 14th Street would worsen. Insufficient bus capacity to absorb the doubling of crosstown passengers compared to existing conditions would force L train riders and existing bus passengers to consider alternative modes for crosstown travel including pedestrian and bicycle trips, as well as private vehicles, taxis, and for-hire vehicles (FHV). On 14th Street, the increase in taxis and FHV could be as high as 1,000 new vehicles in the AM peak hour and 500 new vehicles at the busiest segment, which is double the hourly existing car volumes on 14th Street, so spillover effects on side streets would be likely. Within Brooklyn, there would be potential expansion of vehicle trips, which would result in localized congestion. The conditions on Williamsburg Bridge would worsen due to the potential addition of an estimated 500 vehicles during AM peak hour resulting from L train riders opting for taxis and FHVs. 500 vehicles is a likely conservative estimate since 500 is less than 2 percent of the current AM peak-hour L ridership across the river.

Ferries

The No Action does not include any ferry service, as this service would be above and beyond what MTA NYCT would routinely provide as alternate service.

Pedestrians

Pedestrian volumes would increase substantially in the 14th Street corridor when L train riders would have to walk to their destinations using streets and sidewalks. This corridor currently has high pedestrian volumes; sidewalks would become very crowded and pedestrian flow would worsen making it less safe for pedestrians.

Bicycles

The 14th Street corridor would experience a very large increase in demand for alternate modes of transportation. Cyclists would have to navigate already busy corridors and side streets. Potential conflicts with pedestrians and vehicles would further deteriorate conditions making it less safe for cyclists and pedestrians.

Parking

The No Action would not impact parking.

Proposed Action

Subway

Based on results of MTA NYCT’s ridership modeling, the Proposed Action would result in a 20 percent reduction in demand on adjacent subways between Brooklyn and Manhattan compared to the No Action Alternative. The Proposed Action would allow the subway system to improve operating conditions and improve crowding conditions, thereby improving conditions for riders and overall service reliability compared to the No Action Alternative. This would be a temporary beneficial impact on subway conditions.

Bus

With the proposed ASP, overall levels of travel delay for bus passengers (both for Brooklyn-Manhattan and 14th Street riders) would improve substantially over the No Action Alternative.

• With the Williamsburg Bridge HOV bus priority treatment, it is anticipated that interborough bus service would have adequate schedule and capacity to serve the expected demand.
For the 14th Street bus service, the proposed busway configuration would allow for maximum capacity and travel speeds necessary to accommodate the increased demand, providing an additional 33 and 34 buses in each direction in the AM and PM peak hours, respectively.

As established in SEA, overall levels of travel delay for bus passengers would improve substantially over the No Action Alternative, while also serving tens of thousands additional customers (indicating a much lower travel time per trip given the large increase in ridership). Temporary SBS service would link the crosstown service with the temporary ferry terminal at Stuyvesant Cove and would provide full coverage of service from the East Side of Manhattan thereby greatly improving bus service for Stuyvesant Town and other customers in the eastern portions of the 14th Street corridor. This would be a temporary beneficial impact on bus transit conditions.

Traffic

The vehicle restrictions and bus priority lanes in the proposed ASP would result in substantial improvements in overall travel times compared with the No Action Alternative where the limited bus expansion would create congestion and delay. The potential for automobile diversions from the Williamsburg Bridge would result in localized changes in traffic patterns, including a notable reduction in automobile traffic on the Williamsburg Bridge and the street network on either side, as well as an increase in automobile traffic on other crossings and streets. This would be a temporary but not significant adverse impact to traffic in some areas and a temporary beneficial impact on the Williamsburg Bridge and 14th Street.

Williamsburg Bridge

The Williamsburg Bridge HOV3+ bus priority configuration would dramatically reduce the number of auto trips across the bridge during peak periods. The SEA indicates almost 3,000 vehicles could be diverted from the Williamsburg Bridge in the AM peak hour and almost 3,500 vehicles in the PM peak period. On balance, the HOV3+ option would provide for a more convenient transit connection serving an estimated 4,100 L train riders per AM peak hour and travel speeds would be greatly enhanced for all remaining users of the bridge. The large reduction in vehicles crossing the bridge compared to the No Action Alternative would be expected to ease traffic congestion and increase overall speeds on the streets leading to and from the bridge in both Manhattan and Brooklyn. The potential diversion of several thousand vehicle trips on a temporary basis during the tunnel closure would manifest itself in several ways. Low-occupancy vehicle trips could seek to use other river crossings including the three currently toll-free bridges of the Brooklyn Bridge, Manhattan Bridge, and Queensborough Bridge as well as the Brooklyn Battery Tunnel, Midtown Tunnel, and RFK (Triborough) Bridge. Diverted traffic may alternatively be replaced by travelers taking advantage of the HOV3+ capacity by either carpooling or using FHKVs, or by travelers who could opt to not make the river-crossing trip at all. It is possible that some drivers experiencing traffic congestion at alternative crossings would make such adjustments over the course of the approximate 15-month period that the proposed ASP would be in effect.

The distribution of potential diverted trips to other East River crossings would create temporary increases in traffic volumes on these facilities and localized street networks serving the crossings. MTA NYCCT, in coordination with NYCDOT, will monitor traffic conditions in a dynamic and responsive manner, including at alternate crossings. This includes potentially adjusting traffic approaches and restriction times on the bridge and...
on 14th Street. Because these conditions would last for only approximately fifteen months, and drivers would be expected to adjust their travel activities over the course of the tunnel reconstruction period, and since overall travel patterns would not change significantly, these conditions would not result in significant adverse environmental impacts.

14th Street Corridor
The proposed ASP’s 14th Street busway would restrict vehicular access to 14th Street, with diversion of traffic to local side streets and the larger street network. As summarized in the SEA, based on MTA NYCT and NYCDOT traffic modeling, there would be substantial improvements in overall travel times for passengers by all modes compared with the Additional Buses Only option, which is similar to the No Action Alternative. Because 14th Street would be highly congested in the No Action Alternative, the overall level of congestion in the area under the proposed ASP, as measured by aggregate auto person-hours of delay, would be 28 percent lower in the AM peak hour and 18 percent lower in the PM peak hour. If impacts to just the side streets are assessed (i.e., excluding 14th Street), direct model results indicate mixed impacts: in the AM peak hour, auto times in the proposed ASP would be about the same on 12th, 15th, and 16th Streets, and 14 percent slower on 13th Street compared to the Additional Buses Only option (similar to the No Action Alternative). In the PM peak hour, some streets would have faster travel times and some would have slower times. The overall improvement in travel delay would likely be greater than shown here, considering that these results do not account for potential large shifts to taxis and FHVs that would be likely under the No Action Alternative possibly leading up to 500 new taxi and FHV trips in the corridor in the peak hour, roughly equal to current peak auto volumes along 14th Street. Considering those shifts, there is a strong possibility that even the side streets would be less congested with the proposed ASP than with the No Action Alternative.

The Proposed Action would result in substantial improvement to traffic conditions compared to the No Action Alternative. The potential for automobile diversions from the Williamsburg Bridge would result in localized changes in traffic patterns, including a notable reduction in automobile traffic on the Williamsburg Bridge and the street network on either side as well as an increase in automobile traffic on other crossings and streets. This would be temporary but not significant adverse impact to traffic in some areas and a temporary beneficial impact on the Williamsburg Bridge and 14th Street.

Ferries
The new, temporary ferry service would reduce travel time for some riders by up to 30 minutes when compared with the No Action Alternative, in which no additional ferry service would be provided. This would be a temporary beneficial impact on transit conditions.

It is anticipated that eight boats per peak hour would have a capacity of about 1,192 passengers and estimated AM peak-hour demand is 919 passengers, thereby reflecting a utilization of about 77 percent. While this overall demand could vary considerably by season and daily weather conditions, capacity is sufficient, and the ferry service could absorb additional ridership should the demand grow for the service during the tunnel closure.

Pedestrians
The Proposed Action would substantially improve pedestrian circulation compared to the No Action Alternative, particularly in the 14th Street corridor where walking would be an important alternative mode for crosstown travel. This would be a temporary beneficial impact to pedestrian circulation. The variety of temporary pedestrian amenities would
allow for greater pedestrian circulation and use of the corridor’s sidewalks. In key areas, the busway configuration would widen the usable area for pedestrians and further expand SBS stop locations to speed the boarding/alighting process. At Union Square, the busiest business node in the corridor, additional provisions would expand pedestrian circulation space adjacent to the square, SBS stops, and subway entrances.

**Bicycles**

The proposed ASP measures would provide for temporary one-way bicycle lanes on 12th and 13th Streets and Union Square West. The new lanes would remove a row of parking on each street but would not restrict moving lanes of vehicular traffic. The removal of parking spaces would facilitate through-vehicular movements. The temporary bicycle lanes would result in temporary displacement of nine spaces on Union Square West and approximately 507 parking spaces on 12th and 13th Streets. Overall, the bike lanes would add considerably to the safety and capacity of the bicycle network and would not adversely affect vehicular congestion. The proposed ASP would provide substantial improvement in comparison with the No Action Alternative. This would be a temporary beneficial impact to bicycle transportation.

**Parking**

The Proposed Action would result in temporary displacement of on-street and off-street parking spaces along streets where bicycles, buses, or pedestrians are prioritized.

The proposed ASP L1, L2, L3, and L4 interborough bus routes and temporary M14 SBS would require bus stops and bus layover locations that would temporarily remove up to 1,075 on-street parking spaces: 646 spaces on 12th, 13th, and 14th Streets; 9 spaces on Union Square West; 275 spaces along Grand Street; and 145 spaces along the interborough routes. Please note that the SEA presented an impact to 970 on-street parking spaces. However, as a result of design refinement and additional surveys, MTA NYCT updated the on-street parking impact to a total of up to 1,075. These are a mix of commercial parking, metered parking, and alternate side of the street parking. In addition, up to 220 off-street parking spaces would be temporarily removed: 137 off-street spaces for overnight bus storage at 46-81 Metropolitan Avenue in Brooklyn and 83 off-street spaces for the temporary bus terminal at Stuyvesant Cove.

For the 14th Street corridor, there are five off-street parking garages on 14th Street that would remain accessible to all motorists, as would other off-street parking garages within the broader affected area. For the temporary displacement of parking spaces in the off-street lot by Stuyvesant Cove, to be used as a temporary bus terminal, the total displacement of approximately 83 spaces could readily be absorbed by existing available off-street capacity within a quarter mile of the site.

While the displacement of 1,075 on-street and 220 off-street spaces would adversely affect local residents, daytime commercial users, and visitors who use these parking spaces, this impact is not considered a significant effect on the environment given the temporary nature of the impact and considering the project purpose to provide adequate, daily transit access for 275,000 diverted transit riders.

Overall, the Proposed Action will not result in significant transportation impacts compared to the No Action Alternative.
2. **AIR QUALITY**

Both the No Action and Proposed Action would result in air quality impacts, but they will not be significant. Compared to the No Action Alternative, the Proposed Action would result in a temporary beneficial air quality impact. Although individual locations within the larger network will experience more traffic volume or congestion resulting in air quality impacts, the overall air quality with the Proposed Action in comparison to the No Action would be improved because fewer people would be diverted to personal vehicles, taxis, and FHV’s resulting in fewer total vehicle volumes and increased traffic speeds. All diesel buses, including those to be used for the ASP, have diesel particulate filters and/or meet current emissions control technology that achieve up to 95 percent particulate matter reductions in comparison to older technologies.

The Environmental Protection Agency established National Ambient Air Quality Standards (NAAQS) for air pollutants of concern to determine significance. For the mobile source component, Carbon Monoxide (CO) and Particulate Matter (PM) 2.5 and PM 10 are considered pollutants of concern.

- For CO, the highest 2017 monitored concentration was 0.2 parts per million (ppm). The NAAQS is 9 ppm.

- For PM 10, the highest 2017 monitored concentration was 35 \(\mu g/m^3\). The NAAQS is 150 \(\mu g/m^3\).

- For PM 2.5, the 98th percentile 2017 monitored concentration was 18 \(\mu g/m^3\). The NAAQS is 35\(\mu g/m^3\).

* \(\mu g/m^3\) refers to a unit of measurement. The concentration of an air pollutant is given in micrograms (one-millionth of a gram) per cubic meter air or \(\mu g/m^3\).

Considering the barely traceable levels of CO background concentrations and low levels of the PM background concentrations, it is not expected that additional traffic and congestion under either the No Action or Proposed Action would create an exceedance of respective NAAQS.

To minimize air quality impacts, the following measures to minimize harm has been incorporated into the Proposed Action:

- MTA NYCT’s supplemental bus fleet would include 20 electric buses (15 to be deployed by the fourth quarter of calendar year 2019 on the M14 SBS route and 5 to be deployed at the start of the ASP in April 2019 on the Brooklyn-based interborough bus routes), and 10 hybrid-electric buses in addition to the diesel bus fleet on the Brooklyn-based interborough bus routes.

- MTA NYCT will work with NYCDOT to ensure that NYCDOT’s Freight Mobility Group continues its regular, ongoing outreach to representatives of the trucking industry to educate commercial drivers of their appropriate route options. Trucks diverted off of 14th Street due to the busway will need to find other permitted routes north or south of the corridor and use that route to get as close as possible to their delivery location. This commitment also is a measure to minimize transportation impacts.

- MTA NYCT, in coordination with NYCDOT, also will notify the NYPD Transportation Division’s Truck Enforcement Unit of proposed routing changes associated with the ASP and
coordinate with them on education and enforcement events. This commitment also is a measure to minimize transportation impacts.

Therefore, the Proposed Action will not result in significant air quality impacts.

**No Action**
Under the No Action Alternative, there would be increased traffic volumes from additional bus service and anticipated additional automobile traffic. Traffic on the Williamsburg Bridge and on the local streets approaching the bridge is expected to result in congestion during peak hours. On 14th Street, there would be an increase in bus traffic resulting in high levels of congestion and increased emissions. The increased traffic volumes would result in temporary increases in CO and PM emissions. There would be no ferry service associated with the No Action, and therefore, no increase in ferry emissions.

**Proposed Action**
Compared to the No Action, the Proposed Action would improve traffic speeds and reduce travel delay on Williamsburg Bridge and on 14th Street. Therefore, concentrations of pollutants of concern (CO and PM) at these locations are expected to be lower compared with the No Action. Increased passenger car volume and congestion on the side streets is not expected to significantly impact air quality levels compared with the No Action. Therefore, it is unlikely that the increased traffic under the Proposed Action would result in meeting or exceeding the NAAQS for CO, PM 2.5, and PM 10.

The July 2018 SEA noted that fifteen electric buses would be deployed for the M14 SBS service to coincide with the tunnel closure. However, MTA NYCT notified the FTA in a letter dated August 23, 2018, of the following changes and clarification, as summarized in Attachment C:

- The SEA stated that there would be fifteen electric buses deployed for the M14 SBS bus route. MTA NYCT notified FTA that instead of coinciding with the start of the tunnel closure on April 2019, the deployment of the fifteen electric buses will begin in the fourth quarter of calendar year 2019.

- The SEA did not present any electric buses for the Brooklyn-based interborough bus routes. MTA NYCT notified FTA that it would deploy five electric buses and ten hybrid-electric buses on those routes to coincide with the tunnel closure. This was not presented in the SEA.

- The SEA stated that diesel bus fleet “achieves 95% particulate matter capture”. MTA NYCT clarified this statement to say that historically the diesel buses that MTA retrofitted with diesel particulate filters reduced particulate emissions as much as 95 percent.

Currently all diesel buses, including those to be used for the proposed ASP, have diesel particulate filters and/or meet current emissions control technology that achieve up to 95 percent particulate matter reductions in comparison to older technologies. The above changes would not change the conclusion presented in the SEA. The additional ferry service under the Proposed Action would not result in significant impacts with respect to air quality. Construction of temporary facilities would be short term and minor and would not produce significant air emissions.

Overall, the Proposed Action will not result in significant air quality impact.
3. BIOLOGICAL RESOURCES

Compared to the No Action Alternative, the Proposed Action would result in potential impacts to biological resources. However, the impacts would not be significant. To minimize potential impacts to biological resources, the following measure to minimize harm has been incorporated into the Proposed Action:

- MTA NYCT will adhere to the recommendations of NOAA as required through any applicable USACE permit(s) related to in-water work. NOAA made the following recommendations to be undertaken during construction and removal of the temporary ferry landings:

  1. The temporary barge should float at all stages of the tide.
  2. Piles should be vibrated out to the extent possible. A vibratory hammer for pile installation is preferred. If an impact hammer is used, soft starts and a wooden block should be used to buffer the noise and vibrations during hammering.
  3. Best Management Practices (BMPs) should be employed to ensure turbidity is minimized in the water.
  4. Efforts should be made to ensure no construction materials or debris enter the waterway.

No Action
Under the No Action Alternative, there would be no construction or operation of ferry service and no changes to streetscapes; therefore, there would be no impact to biological resources.

Proposed Action
The Proposed Action will include temporary changes to streetscapes to allow for bus priority and improved pedestrian and bicycle access. These changes will occur in previously developed areas and will not affect biological resources.

The implementation of temporary ferry service between North Williamsburg and Stuyvesant Cove is not anticipated to result in significant adverse impacts to biological resources during construction of the temporary ferry landing in the East River or during ferry service operations. This includes potential impacts to threatened and endangered species, aquatic biota, and water quality in the East River due to installation and removal of piles and platforms for the ferry landing at North Williamsburg. Consultation with NOAA NMFS Protected Resources Division indicated that the Proposed Action is “Not Likely to Adversely Affect” (NLAA) endangered or threatened species protected by the Endangered Species Act (ESA) in the project area (letter dated August 23, 2018). NOAA NMFS Habitat Conservation Division completed its consultation on July 13, 2018, and has determined that the Proposed Action will have no substantial adverse effects on Essential Fish Habitat (EFH), subject to measures to mitigate harm during construction and removal of the temporary landings.

Overall, the Proposed Action will not result in significant impacts to biological resources.

4. HAZARDOUS MATERIALS

Compared to the No Action Alternative, the Proposed Action would result in potential adverse hazardous materials impacts. However, the impacts would not be significant. Standard industry practices and health and safety protocols would be implemented if hazardous materials are found during excavation. To ensure
impacts are not significant, the following measures to minimize harm have been incorporated into the Proposed Action:

- MTA NYCT will develop and implement a Construction Health and Safety Plan to avoid exposure of workers and the public to any hazardous materials during construction.

- In addition, MTA NYCT will abide by the regulations and requirements set forth by the NYSDEC for the management and removal of hazardous materials.

**No Action**
Under the No Action Alternative, there would be no new construction or disturbance of potentially contaminated materials; therefore, there would be no impact related to hazardous materials.

**Proposed Action**
Minor amounts of excavation/surface preparation work may be required that could increase exposure pathways to potentially contaminated materials, such as petroleum contaminated soils. Most ground disturbance would be limited to 18 inches below grade, except for select areas where electrical connections would be made 30 inches below grade. The shallow soil disturbance would make it unlikely that unforeseen hazardous materials would be encountered.

Therefore, the Proposed Action will have no significant impacts with respect to hazardous materials.

5. **HISTORIC, CULTURAL, AND ARCHAEOLOGICAL RESOURCES**

Compared to the No Action Alternative, the Proposed Action will not result in adverse impacts to historic, cultural, and archaeological resources, pursuant to Section 106 of the National Historic Preservation Act (Section 106). (Please see below for a separate discussion of Section 4(f) resources). The following measures have been incorporated into the Proposed Action to ensure that there will be no adverse impacts to historic, cultural, and archaeological resources:

- MTA NYCT will develop, in coordination with the New York State Historic Preservation Office (SHPO), and implement a Construction Protection Procedure requiring protection of all adjacent historical resources during construction.

- Technical Policy and Procedure Notice #: 10/88 from the NYC DOB for construction adjacent to historic structures will be utilized for all work adjacent to historical resources or within historic districts.

MTA NYCT, in coordination with NYCDOT, will consider repairing Union Square West, which is part of the Union Square National Historic Landmark, with replacement concrete and granite pavers either in preparation for the temporary ASP or after the temporary features of the ASP are no longer needed and removed. MTA NYCT and NYCDOT currently plan to replace the existing concrete and granite pavers with asphalt as part of the ASP.

**No Action**
Under the No Action Alternative, there would be no new construction; therefore, there would be no impact on historic and archaeological resources.
**Proposed Action**

Pursuant to Section 106 of the National Historic Preservation Act, SHPO opined by later dated June 25, 2018, that the Proposed Action would have No Effect on the Union Square National Historic Landmark or on other eligible or listed historic or archeological resources, including those adjacent to elements of the proposed ASP that would require minor construction for street and sidewalk treatments, bus storage, and the temporary ferry landing. As Union Square is a National Historic Landmark, FTA coordinated with the U.S. Department of Interior (DOI) requesting concurrence on the proposed Section 106 finding of No Effect (as well as the proposed Section 4(f) De Minimis Impact Determination). On August 9, 2018, DOI indicated that it has no comments on the proposed Project. With the measures described above, the Proposed Action would have No Effect to historic, cultural, and archaeological resources, pursuant to Section 106.

Therefore, FTA, in consultation with SHPO, has determined the Proposed Action will have No Effect on Section 106 resources.

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6. **NOISE AND VIBRATION**

Both the No Action and Proposed Action would result in increased noise due to the increase in vehicular traffic and changes to traffic patterns while ground-borne vibration generated by increased traffic would not be perceptible. Noise level increases of more than 3 decibels (A) is considered the minimum level of noise increase in which most listeners can perceive and thus result in potential annoyance to listeners. A significant noise level increase is defined as a noise level increase of greater than 3 decibels (A). As a screening methodology, a doubling of passenger car equivalents would result in an increase of 3 decibels (A) noise increase. The Proposed Action would not result in a doubling of passenger car equivalents, as discussed below.

To determine if a significant noise level increase can be expected to occur, the New York City Environmental Quality Review (CEQR) guidelines require utilizing the Passenger Car Equivalents (PCE) screening methodology. The PCE procedure required converting and summing noise energy generated by all vehicles into automobile equivalent values traveling past a receptor site. For each roadway, the logarithmic ratio of the No Action PCE versus the Existing PCE is determined and the Proposed Action PCE versus No Action PCE is determined. These incremental values represent projected changes in noise level over time. If the total change over time is greater than three (3), then the increase is deemed significant and triggers a more quantitative noise analysis to determine if noise mitigation is required. The PCE screening assessment was completed for the hours between 6:00 am to 10:00 am, and 3:00 pm to 7:00 pm, when the traffic pattern changes and increases in new bus trips are expected to be greatest. Based on the assessment, there would be no doubling of PCEs; therefore, no quantitative noise analysis or mitigation is required.

For both the No Action and Proposed Action, ground borne vibration generated by increases in vehicular traffic and changes to traffic patterns would not be perceptible during any time. Rubber tire vehicles are a very poor conductor of ground vibration. The FTA referenced measurement data for rubber tire vehicles moving at various travel speeds indicates that vibration levels generated from bus rapid transit vehicles and road traffic movements in general are typically in the 50 to 60 vibration decibel (VdB) range. Human perceptibility starts at 65 VdB and damage to buildings would require vibration levels to exceed 80 VdB. Therefore, ground vibration can be expected to remain well below minimum perceptibility limits.

To minimize impacts, the following measure to minimize harm has been incorporated into the Proposed Action:
Finding of No Significant Impact
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- MTA NYCT will adhere to the New York City Noise Control Code to minimize construction noise and vibration impacts.

- MTA NYCT, in coordination with NYCDOT, will maintain the roadways per agency standards to prevent large potholes or other poor pavement conditions to minimize vibration impacts.

- MTA NYCT, in coordination with NYCDOT, will work with the NYPD to manage truck traffic diverted from 14th Street due to the busway restrictions.

No Action
Under the No Action Alternative, there would be increased traffic volumes from additional bus service and additional automobile traffic. Automobile traffic would divert to the adjacent streets due to high levels of congestion on 14th Street. The increase in bus and automobile volumes on Williamsburg Bridge and within the 14th Street corridor, including side streets, would result in increase in noise. However, these changes would not be significant because the PCE ratio values versus existing conditions are expected to remain below the PCE doubling level and thus below the 3 dB(A) increase threshold of human perceptibility.

Proposed Action
The Proposed Action will increase bus volumes and incorporate HOV restrictions and bus priorities as part of the M14 SBS and interborough bus service. These activities will result in the diversion of automobile traffic from the bus routes. Noise levels may increase along 14th Street, bus routes, the approaches to the Williamsburg Bridge, and side streets where automobile traffic would be diverted. However, over the larger study area, the redistribution of trips by location, mode, or time would not be expected to change overall mobility or traffic patterns. There would be noise impacts, but the projected increases in noise levels would not be significant because there would not be a doubling of passenger car equivalents under the Proposed Action. FTA noise impact criteria assigns noise exposure assessment based on three potential impact level conditions: No Impact, Moderate Impact, and Severe Impact. Temporary ferry service would result in peak-hour noise impact below FTA’s Moderate Impact; therefore, no significant adverse noise impact is anticipated from the new ferry service.

Overall, there will be no significant noise and vibration impact as a result of the Proposed Action.

7. SOCIAL RESOURCES AND ECONOMIC IMPACT

Both the No Action and Proposed Action would result in impacts to social resources and economic impacts. The analysis behind impacts to social resources and economic impacts relates to land use, acquisition, displacement, relocations, neighborhoods and populations and public services. The No Action Alternative would result in adverse impact to neighborhoods and populations that would be inadequately served by the temporary transportation services provided and that would experience increased traffic congestion. In addition, there is a risk that public services would be adversely affected by the increased traffic and be unable to adequately serve the populations within the service area. Compared to the No Action Alternative, the Proposed Action, which incorporates the measures noted below, would result in a beneficial impact with respect to neighborhoods and populations, and public services. The following measures have been incorporated into the Proposed Action to minimize potential impacts:

- Access to any community facilities and services within the affected areas will be maintained.
Finding of No Significant Impact
Alternative Service Plan for the Canarsie Tunnel Project

- Temporary street treatments and operational restrictions will allow for travel by emergency response vehicles at all times to ensure public services are not adversely impacted.

- Although non-emergency vehicles will be restricted on the M14 SBS blocks of 14th Street, commercial and residential activities (including local deliveries and passenger pick-up and drop-off) along 14th Street will remain in place with the proposed ASP in order to minimize disruption to businesses and residents along the corridor.

No Action
The No Action Alternative would not require permanent acquisitions, displacements, or relocations. The temporary suspension of the L train service would not permanently alter land use or development patterns, and there would be no direct or indirect business closures. However, because of the adverse transportation impacts, the No Action Alternative would result in adverse impacts to neighborhoods and populations that would be inadequately served by the temporary subway and bus enhancements. Temporary closure of the tunnel will result in disruption to approximately 275,000 riders that will need to divert to other transportation options. As noted above in the Transportation section, the No Action Alternative would result in adverse impacts to subway and bus transit riders who rely on transit for their daily life. In addition, there is a risk that public services would be adversely affected by the increased traffic and congestion.

Proposed Action
The Proposed Action would not require permanent acquisitions, displacements, and relocations. There would be no significant adverse impacts to neighborhoods and public services. There would be no permanent impacts or inconsistencies with existing land uses, as summarized below:

- The proposed temporary ferry service would operate from existing facilities at Stuyvesant Cove in Manhattan and North Williamsburg in Brooklyn;
- The proposed temporary storage yards for bus parking in Queens and Manhattan would be compatible with the existing parking and storage facility uses of these sites;
- The proposed temporary bus routes would operate within the existing street right-of-way; and
- Automobile traffic diverted from 14th Street to adjacent side streets as a result of the proposed busway would be spread over many crosstown options and traffic would be diverted to existing street right-of-way.

The provision of the temporary alternative services and associated temporary street treatments would have no long-term effect on surrounding land uses.

Compared with the No Action, there would be noticeably more access to transportation alternatives in the 14th Street Corridor and in the Williamsburg neighborhood. Along the 14th Street corridor, the temporary SBS service and additional pedestrian space and bike lanes would enhance mobility benefiting existing businesses with easier access to customers. Commercial and residential activities (including local deliveries and passenger pick-up and drop-off) along 14th Street would remain in place with the proposed ASP in order to minimize disruption to businesses or residents along the corridor. In Williamsburg, Bedford Avenue Station would remain in service as the western terminus of the Brooklyn-only service on the L train and customers would continue to access the station for that purpose, or to connect to the G train. The availability of temporary interborough bus service (L3 and L4) and ferry service provide other options for riders in the area and would maintain the ability to walk to transit as well as provide similar access to local commercial districts. This would also be the case further to the east at the Grand Street terminus of the temporary interborough buses (L1 and L2) which meets the existing L train station area.
Citywide, the proposed ASP provides a benefit to workers and employers in providing the maximum flexibility and system reliability to the most customers during the L train closure.

Overall, the Proposed Action will not result in significant adverse social resources and economic impacts.

8. WATER RESOURCES

Compared to the No Action Alternative, the Proposed Action would result in potential adverse impacts to water resources, including floodplains and coastal zone resources. To minimize impacts to water resources, the measure to minimize harm described in the Biological Resources section has been incorporated into the Proposed Project. Based on the temporary nature of the impact and with the measure to minimize harm, there will be no significant impact to water resources.

No Action
There would be no construction activities or changes to service that would occur within or impact water, floodplain or coastal zone resources.

Proposed Action
The Proposed Action would have no significant adverse impacts to water resources. Elements in the floodplains would be designed to be flood resistant and would not affect flood levels, flood risk, or the flow of flood waters within or around the project sites. Due to the temporary nature and limited extent of Project activities in the coastal zone, the Proposed Action would be consistent with the state coastal policies (New York State Department of State determined the ASP meets their general consistency concurrence criteria in a letter dated July 23, 2018). Project elements located within the floodplain, such as the temporary bus terminal at Stuyvesant Cove and temporary pedestrian access modifications within Stuyvesant Cove Park, would not result in the construction of permanent structures or a permanent increase in impermeable surfaces. There would be negligible temporary increases in impermeable surfaces. The temporary ferry landing in North Williamsburg would be designed to be flood resistant and would not affect flood levels, flood risk, or the flow of flood waters within or around the project sites.

The Proposed Action will not result in significant impacts to water resources.

9. CONSTRUCTION

Compared to the No Action, there would be potential construction impacts as a result of the Proposed Action. However, the construction impact would not be significant. The following measures to minimize harm have been incorporated into the Proposed Action:

- MTA NYCT, in coordination with NYCDOT and contractors, will follow best management practices, AASHTO guidelines, and adhere to the NYC Noise Code to minimize impacts during construction.

- MTA NYCT will adhere to permitting requirements for the construction of the ferry landing at North Williamsburg to ensure no significant adverse impacts to biological and water resources during construction activities.

No Action
The No Action would require no new construction. This alternative would have no construction impacts.
**Proposed Action**
Construction activities for the Proposed Action would be limited to primarily temporary accommodations (and removal) to allow for the proposed ASP, including a temporary ferry landing at North Williamsburg, a bus terminal and pedestrian path at Stuyvesant Cove, overnight bus storage lots, and temporary street treatments along the bus service routes. Construction of these temporary facilities would be short term in duration (less than six months) and minor in scope, and is not expected to entail work activities that would produce significant air emission, noise and vibration levels, or traffic impacts during construction. Permanent improvements would be limited to circulation improvements at existing subway stations through stairway re-openings and enhanced turnstile control areas.

Overall, the Proposed Action will not result in significant construction impacts.

**10. GREENHOUSE GAS EMISSIONS**
Both the No Action and Proposed Action would result in temporary greenhouse gas emissions (GHG) impacts. However, compared to the No Action, the Proposed Action would result in temporary reduction of GHG emissions.

**No Action**
Under the No Action Alternative, vehicle miles travelled (VMT) is likely to temporarily increase resulting in increased GHG emissions.

**Proposed Action**
Compared with the No Action, the Proposed Action provides for a total overall daily vehicle miles travelled (VMT) reduction of 25,000 vehicle miles during the AM peak period over the 15-month project duration due to HOV restrictions on bridges and automobile and truck prohibitions on 14th Street. While operation of additional buses associated with the Proposed Action and minor construction associated with ferry landings would generate new GHG emissions, the GHG emissions avoided through an overall reduction in VMT over the 15-month period of implementation of the ASP would likely more than offset any new GHG emissions from project-related vehicles or construction. Based on the FTA “Greenhouse Gas Emissions from Transit Projects: Programmatic Assessment,” (January 2017, FTA Report No. 0097) and guidance, no further substantiation of GHG emissions is necessary for the proposed ASP. There would be short-term reduction in VMT compared to the No Action alternative.

Overall, there will be no significant GHG emissions impact as a result of the Proposed Action.

**11. ENVIRONMENTAL JUSTICE**
Compared to the No Action, the Proposed Action would improve mobility and travel conditions for Environmental Justice (EJ) communities, which include minority and low-income populations. A large portion of the area served by the proposed ASP, particularly in Brooklyn, the Lower East Side/Chinatown neighborhoods of Manhattan, and the easternmost section of the M14 SBS route consists of EJ communities. The proposed temporary M14 SBS route (except the easternmost section) is not within an EJ area. For both alternatives, the same benefits and impacts would accrue to the entire population living in areas served by the L train and where the proposed ASP would operate. Neither the No Action nor the Proposed Action would result in disproportionate adverse impacts on EJ communities.
No Action
The No Action would result in overcrowding on alternate subway lines and other disruptions to transportation even with the alternate service MTA NYCT would routinely implement. This will impact EJ and non-EJ communities alike. Therefore, the No Action Alternative would not result in disproportionate adverse impacts on EJ communities.

Proposed Action
A large portion of the area served by the Proposed Action, particularly in Brooklyn and the Lower East Side/Chinatown neighborhoods of Manhattan, consists of EJ areas. Similarly, large portions of Brooklyn served by other subway lines expected to experience additional ridership during the L train closure are also EJ communities.

Bus routes Except for the easternmost section, the proposed temporary M14 SBS route would not be within an EJ area. The temporary Brooklyn-based interborough bus service would travel through mostly EJ areas, and have stops within EJ areas, along its four routes within both Brooklyn and Manhattan. Therefore, the bus routes will serve both EJ and non-EJ communities.

Ferry The North Williamsburg ferry landing is within an EJ area, which would experience increased noise levels from ferry operations but would benefit from the new ferry service. The noise impact in North Williamsburg is not disproportionate because the noise impact from ferry service would also be experienced at Stuyvesant Cove ferry landing, which is not within an EJ community.

Overnight bus storage facilities
The potential temporary bus storage facilities on the westside of midtown in Manhattan and at 46-81 Metropolitan Avenue in Queens are located within EJ neighborhoods. The potential overnight bus storage lot located underneath the Williamsburg Bridge is not in an EJ neighborhood. The bus traffic to and from these lots will be during off-peak times of the day. Due to the existing mostly transportation and industrial settings of these potential sites and the relatively short duration of their use for bus storage, no significant impact on the surrounding communities is expected.

The temporary ferry and bus routes were selected based on travel demand analysis, public feedback, and allocation of limited resources to provide the most direct service between Brooklyn and Manhattan that would provide connections for diverted L train riders to other subway or bus lines. The location for the potential bus storage lots were based on their proximity to both the service routes and MTA NYCT bus depots, where they would be fueled and maintained, with both factors intended to minimize impacts to the surrounding community.

The proposed ASP provides a benefit to workers, employers, and residences in providing maximum flexibility and system reliability to the most customers during the suspension of L train service. Compared to the No Action, there would be improved mobility and travel conditions for diverted L train riders as well as for riders on the other subway lines serving Brooklyn and Manhattan, particularly on the J/M/Z lines, due to the proposed temporary interborough bus services and the temporary ferry service. This beneficial impact would be for all areas including EJ and non-EJ communities.

There will be no disproportionate adverse effects on environmental justice communities as a result of the Proposed Action.
11. SECTION 4(f) of the DEPARTMENT OF TRANSPORTATION ACT

FTA has determined that the impacts at three Section 4(f) properties would be de minimis. The Proposed Action would have minor, temporary impacts at the following Section 4(f) properties: (1) North 5th Street Pier and Park, (2) Stuyvesant Cove Park, and (3) the Union Square National Historic Landmark. The proposed temporary alterations would be consistent with the existing uses and would not adversely affect the public’s use of these properties or result in the impairment of their recreational or historic features. To minimize impacts to these resources, the following measure has been incorporated into the Proposed Action:

- MTA NYCT will continue to coordinate with NYCEDC and NYCDPR regarding the temporary use of areas of public parks or recreational areas. After the 15-month ASP service is complete, MTA NYCT would restore the park and recreational areas to agreed-upon conditions.

North 5th Street Pier and Park

NYCDPR, the officials with jurisdiction of North 5th Street Pier and Park, provided concurrence (September 4, 2018) that a Section 4(f) de minimis impact finding for the temporary use of the park is appropriate. NYCDPR clarified the size of the park to the FTA: the 51,000 square feet (1.17 acres) size of the park provided in the SEA only reflects the landside portion; the actual size of the park, including the in-water portion, is 56,000 square feet. The total impact to the park would be 4,300 square feet instead of 68 square feet identified in the SEA. The impact would still be minor and temporary and a de minimis impact finding would still be appropriate.

Stuyvesant Cove Park

NYCEDC, the official with jurisdiction of Stuyvesant Cove Park, provided concurrence (letter dated August 22, 2018) that a Section 4(f) de minimis impact finding for the temporary use of the park is appropriate. NYCEDC clarified that there would also be temporary removal of one tree and one bench and relocation of a trash can; this information was not presented in the SEA.

Union Square National Historic Landmark

SHPO and DOI are officials with jurisdiction over the Union Square National Historic Landmark. In a letter dated July 27, 2018, DOI indicated it has no comments on the Section 4(f) determination. On June 25, 2018, SHPO opined that the project will have no effect on the Union Square National Historic Landmark.

The public had the opportunity to review and comment on potential impacts to Section (f) resources in conjunction with the 30-day public comment period for the SEA.

FTA has determined that the impacts at three Section 4(f) properties identified above would be de minimis. Therefore, FTA finds that there will be no significant impact to Section 4(f) properties.

CONCLUSION

The Proposed Action is designed to provide viable transportation alternatives to the most number of customers as possible. It would minimize the impacts of the full tunnel closure by providing transportation benefits in terms of travel times and mobility choices, reduce congestion, and alleviate
severe conditions better than the No Action Alternative. In addition, the Proposed Action incorporates specific measures to minimize harm, as summarized in Attachment B. The early public outreach conducted by MTA NYCT and during the public comment period for the SEA helped inform the Proposed Action.

Compared to the No Action Alternative, generally, there would be temporary beneficial impacts for the following four areas: (1) Transportation (includes Subway, Bus, Traffic, Ferry, Pedestrian, and Bicycles); (2) Air Quality; (3) Social Resources and Economic Conditions; and (4) Greenhouse Gas Emissions. There are potential adverse impacts for the following six areas, but because of the limited and/or temporary nature of the Proposed Action, the impacts are not considered significant: (1) Biological Resources; (2) Hazardous Materials; (3) Noise and Vibration; (4) Water Resources; (5) Construction; and (6) Section 4(f). There would be a potential adverse impact to Parking (analyzed under Transportation), but the limited removal of parking spaces would not create a significant adverse impact on parking overall throughout the larger area. For Historic Resources and Section 4(f), FTA is continuing to coordinate with officials with jurisdiction to ensure the Proposed Action has No Effect on historic resources, pursuant to Section 106, and de minimis impacts on Section 4(f) properties. In addition, there would be no disproportionately high and adverse impacts to Environmental Justice communities. Therefore, the Proposed Action will not result in significant adverse impacts for any of the environmental areas analyzed.

In making this Finding of No Significant Impact, FTA considered the context and the intensity of the potential impacts, as summarized below.

The Proposed Action will take place within a dense urban environment within Manhattan and Brooklyn where more people depend on public transit than they do on automobiles for their day-to-day activities. The population densities along the L line route as well as in the areas that will be impacted require effective, reliable, and efficient public transit. The tunnel closure will result in disruption to nearly 400,000 daily L train riders; approximately 275,000 of these riders will need to divert to other transportation options. Although the Proposed Action will potentially result in site-specific impacts, such as loss of parking spaces along the 14th Street corridor to provide bus priority and on 12th and 13th Street to provide one-way bicycle lanes, these site-specific impacts are not considered significant given the context described above and considering the project purpose and need to provide transportation alternatives to the greatest possible number of diverted L train riders, which is estimated at 275,000.

The potential intensity of the impacts is not significant for the following reasons:

- There will be no adverse impact to public health or safety. The analysis of the Proposed Action presented in the SEA resulted in no significant impacts to air quality, emergency vehicle access, and social resources.
- There are no unique characteristics of the geographic area of the ASP. Although there are numerous historic resources located in the areas of the ASP elements, there will be No Effect to historic resources.
- The potential adverse impacts to Biological Resources, Hazardous Materials, Noise and Vibration, Water Resources, Construction, and Section 4(f) are not highly controversial.
- The possible effects on the environment are not highly uncertain nor do they involve unique or unknown risks. The SEA and this FONSI provide detailed analysis of impacts on the relevant environmental topic areas. The Proposed Action, compared to the No Action Alternative, will not result in significant impacts in any of the areas analyzed.
Finding of No Significant Impact
Alternative Service Plan for the Canarsie Tunnel Project

- Although the Proposed Action is related to the rehabilitation of the tunnel, the rehabilitation is taking place within the existing transportation right-of-way; therefore, there will be no cumulative significant impacts.

- There will be no adverse impacts to historic resources or to endangered or threatened species.

- There will be no violation of Federal, State, or local law or requirements for the protection of the environment.

Therefore, the Proposed Action will have no significant impact on the human and natural environment.

Attachment A: Summary of Comments and Responses
Attachment B: Revised Measures to Minimize Harm
Attachment C: Modifications, Clarifications and Errata Sheet
U.S. DEPARTMENT OF TRANSPORTATION
FEDERAL TRANSIT ADMINISTRATION

FINDING OF NO SIGNIFICANT IMPACT
(FONSI)

CANARSIE TUNNEL PROJECT

NEW YORK, NY

METROPOLITAN TRANSPORTATION AUTHORITY
NEW YORK CITY TRANSIT

NATIONAL ENVIRONMENTAL POLICY ACT FINDING

Based on the Federal Transit Administration’s (FTA) review of the analysis presented in this Finding of No Significant Impact (FONSI), the accompanying Supplemental Environmental Assessment and Section 4(f) Review (SEA) for the Canarsie Tunnel Project, dated July 2018; agency and public comments received on the SEA and responses to comments (Attachment A); revised measures to minimize harm (Attachment B); and clarifications and modifications made to the information presented in the SEA and Alternate Service Plan (Attachment C), FTA finds, pursuant to 23 C.F.R. § 771.121 that the Proposed Action will have no significant impact on the environment.

Stephen Goodman, P.E.
Regional Administrator, Region 2
Federal Transit Administration

9/13/18
Date
U.S. DEPARTMENT OF TRANSPORTATION
FEDERAL TRANSIT ADMINISTRATION

SECTION 4(f) DE MINIMIS IMPACT DETERMINATION

NORTH 5TH STREET PIER AND PARK
NEW YORK, NY

CANARSIE TUNNEL PROJECT
METROPOLITAN TRANSPORTATION AUTHORITY
NEW YORK CITY TRANSIT AUTHORITY

FTA SECTION 4(f) De Minimis Impact Determination

The Federal Transit Administration (FTA) has determined that, pursuant to 23 C.F.R. § 774.3(b), the Proposed Action, as described in the Supplemental Environmental Assessment and Section 4(f) Review (SEA) prepared for the Canarsie Tunnel Project, dated July 2018, will have a Section 4(f) de minimis impact, as defined in 23 C.F.R. § 774.17, on the NORTH 5TH STREET PIER AND PARK, which is a Section 4(f) property. The impact will not adversely affect the features, attributes, or activities qualifying the property for protection under Section 4(f). The impacts are temporary in nature and the alterations would not adversely affect the public’s use of the property. After the 15-month Alternative Service Plan is complete, MTA NYCT will restore the property to conditions agreed upon by the New York City Department of Parks and Recreation (NYC DPR), which is the official with jurisdiction over the Section 4(f) property.

The coordination requirements set forth in 23 C.F.R. § 774.5(b)(2) have been met. Public notice and an opportunity for public review and comment concerning the effects on the protected activities, features, or attributes of the property were provided concurrent with the 30-day public viewing period of the SEA. FTA informed the NYC DPR of its intent to make a de minimis impact finding. Following the public viewing period of the SEA, NYC DPR provided concurrence by letter dated September 4, 2018, that a Section 4(f) de minimis impact finding for the temporary use of the NORTH 5TH STREET PIER AND PARK is appropriate.

[Signature]
Stephen Goodman, P.E.
Regional Administrator, Region 2
Federal Transit Administration

[Date]
9/13/18
Finding of No Significant Impact
Alternative Service Plan for the Canarsie Tunnel Project

U.S. DEPARTMENT OF TRANSPORTATION
FEDERAL TRANSIT ADMINISTRATION

SECTION 4(f) DE MINIMIS IMPACT DETERMINATION

STUYVESANT COVE PARK
NEW YORK, NY

CANARSIE TUNNEL PROJECT
METROPOLITAN TRANSPORTATION AUTHORITY
NEW YORK CITY TRANSIT AUTHORITY

FTA SECTION 4(f) De Minimis Impact Determination

The Federal Transit Administration (FTA) has determined that, pursuant to 23 C.F.R. § 774.3(b), the Proposed Action, as described in the Supplemental Environmental Assessment and Section 4(f) Review (SEA) prepared for the Canarsie Tunnel Project, dated July 2018, will have a Section 4(f) de minimis impact, as defined in 23 C.F.R. § 774.17, on theSTUYVESANT COVE PARK, a Section 4(f) property. The impact will not adversely affect the features, attributes, or activities qualifying the property for protection under Section 4(f). The impacts are temporary in nature and the alternations would not adversely affect the public’s use of the property. After the 15-month Alternative Service Plan is complete, MTA NYCT will restore the property to conditions agreed upon by the New York City Economic Development Corporation (NYCEDC), which is the official with jurisdiction over the Section 4(f) property.

The coordination requirements set forth in 23 C.F.R. § 774.5(b)(2) have been met. Public notice and an opportunity for public review and comment concerning the effects on the protected activities, features, or attributes of the property were provided concurrent with the 30-day public viewing period of the SEA. FTA informed the NYCEDC of its intent to make a de minimis impact finding. Following the public viewing period of the SEA, the NYCEDC provided concurrence in writing by letter dated August 22, 2018, that a Section 4(f) de minimis impact finding for the temporary use of the STUYVESANT COVE PARK is appropriate.

Stephanie Goodman, P.E.
Regional Administrator, Region 02
Federal Transit Administration

9/18/18
Date
U.S. DEPARTMENT OF TRANSPORTATION
FEDERAL TRANSIT ADMINISTRATION

SECTION 4(f) DE MINIMIS IMPACT DETERMINATION

UNION SQUARE NATIONAL HISTORIC LANDMARK
NEW YORK, NY

CANARSIE TUNNEL PROJECT
METROPOLITAN TRANSPORTATION AUTHORITY
NEW YORK CITY TRANSIT AUTHORITY

FTA SECTION 4(f) De Minimis Impact Determination

The Federal Transit Administration (FTA) has determined that, pursuant to 23 C.F.R. § 774.3(b), the Proposed Action, as described in the Supplemental Environmental Assessment and Section 4(f) Review (SEA) prepared for the Canarsie Tunnel Project, dated July 2018, will have a Section 4(f) de minimis impact, as defined in 23 C.F.R. § 774.17, on the UNION SQUARE NATIONAL HISTORIC LANDMARK, a Section 4(f) property. The impact will not adversely affect the features, attributes, or activities qualifying the property for protection under Section 4(f). The impacts are temporary in nature and the alternations would not adversely affect the public’s use of the property.

The coordination requirements set forth in 23 C.F.R. § 774.5(b)(1), which requires consultation with parties identified in accordance with 36 C.F.R. Part 800, have been met. Public notice and an opportunity for public review and comment concerning the effects on the protected activities, features, or attributes of the property were provided concurrent with the 30-day public viewing period of the SEA. Pursuant to 23 C.F.R. § 774.17, both the New York State Historic Preservation Officer (SHPO) and United States Department of Interior (DOI) are officials with jurisdiction over the UNION SQUARE NATIONAL HISTORIC LANDMARK. In a letter dated June 25, 2018, SHPO opined, in accordance with 36 C.F.R. Part 800, that there would be No Effect to the Union Square National Historic Landmark. By letter dated August 9, 2018, DOI notified FTA that it has no comment on the project.

[Signature]
Stephen Goodman, P.E.
Regional Administrator, Region 02
Federal Transit Administration

[Signature]
Date
9/13/18
FINDING OF NO SIGNIFICANT IMPACT

ATTACHMENT A: Summary of Comments and Responses

Project: Alternative Service Plan for the Canarsie Tunnel Project
Project Sponsor: Metropolitan Transportation Authority New York City Transit
Project Location: New York City, New York
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A. Introduction

This document summarizes and responds to comments on the July 2018 Supplemental Environmental Assessment (SEA) for the Alternative Service Plan (ASP) to be implemented during the Canarsie Tunnel Project. The SEA was prepared by the Metropolitan Transportation Authority New York City Transit (MTA NYCT) in cooperation with New York City Department of Transportation (NYCDOT) in compliance with the National Environmental Policy Act (NEPA) for the Federal Transit Administration (FTA) as lead federal agency. Public review for the SEA began with publication and distribution of the SEA on July 20, 2018.

A Notice of Availability for the SEA and an announcement of the public meeting was published in the following newspapers: The New York Post, New York Daily News, Metro, AM New York, El Especialito, and Sing Tao. Copies of the SEA and Notice of Availability were available for public review at the offices of the MTA (at 2 Broadway); FTA Region 2 (One Bowling Green, Room 429); the Brooklyn Borough President’s office; Community Boards (and libraries in) 1, 4, 5, 16, and 18 in Brooklyn; the Manhattan Borough President’s office; Community Boards (and libraries in) 2, 3, 4, 5, and 6 in Manhattan; the Queens Borough President’s office; and Community Board 5 (and library) in Queens. In addition, the SEA was available on MTA’s website at: http://web.mta.info/mta/news/notices/

MTA NYCT held a public meeting to receive comments on the SEA at 5 PM on August 6, 2018 at MTA Headquarters, 2 Broadway, Manhattan. At the meeting, a total of 40 speakers provided comments and an additional four attendees submitted comment cards. The public comment period remained open from July 20, 2018 through August 19, 2018. Comments on the SEA were accepted during the comment period via the website, mail, and e-mail through August 19, 2018. In addition to the oral testimony at the public meeting, an additional 359 letters, postcards, emails, and petitions were received. All relevant comments received that are germane to the Alternative Service Plan, including any late filed comments, are summarized and responded to in this attachment.

This document is organized as follows. Section B lists all resource agencies, elected officials, individuals, and organizations that commented on the SEA. This list is organized alphabetically. Following each commenter’s name is a list of the comments made, referenced by comment number. Section C contains a summary of all comments made and a response to relevant comments, including comments filed late (after the close of the comment period). Where similar comments on the same subject matter were made by more than one person, a single comment summarizes all comments on that issue. Following each comment is a list in parentheses of people or organizations that made the comment. Section D provides correspondence received from agencies subsequent to release of the SEA.

The comments are organized into 16 different subject areas, and provided in the same general order as the organization of the SEA: Federal Environmental Review Process; Overall Comments on the SEA or ASP; Subway Transit; Bus Transit; Traffic and Roadways; Ferries; Pedestrians; Bicycles; Parking; Air Quality; Historic, Cultural, and Archaeological Resources; Noise and Vibration; Parklands/Section 4(f); Cumulative Impacts; Public Outreach; and miscellaneous other comments.
Based on a review of public comments, a modification to the Measures to Minimize Harm is considered necessary:

- Since it is clear from public comment that enforcement of traffic regulations is a key concern of residents and businesses, MTA NYCT, in coordination with NYCDOT, commits to work with New York Police Department (NYPD) on enforcement of traffic regulations.

Based on a review of public and agency comments, a modification to the ASP is considered necessary:

- MTA NYCT has added a new L5 bus route providing service from Canarsie to the Crown Heights-Utica Av 3/4 station.
B. Organizations and Individuals Who Commented on the SEA or ASP

ELECTED OFFICIALS

1. Honorable Corey Johnson, Speaker of the New York City Council; Hon. Brad Hoylman, New York State Senator, Hon. Richard N. Gottfried, Assembly Member; Hon. Deborah J. Glick, Assembly Member; Hon. Carlina Rivera, Council Member; and Hon. Keith Powers, Council Member joint letter dated August 19, 2018 (Comments 4, 190, 234, 237, 247, 255)

2. Honorable Carolyn B. Maloney, United States House of Representatives, comments made at public meeting, August 6, 2018 (presented by David Leeds, District Representative) (Comments 17, 60, 69, 78, 99, 193, 235, 239, 266)

3. Honorable Deborah Glick, New York State Assembly, comments made at public meeting, August 6, 2018 (Comments 4, 68, 73, 77, 128, 190, 214, 219, 234, 237, 247, 254, 255, 258, 268)

4. Honorable Harvey Epstein, New York State Assembly, comments made at public meeting, August 6, 2018, and email submissions dated August 16, 2018 and August 18, 2018 (Comments 11, 12, 81, 87, 141, 142, 201, 230, 234, 235, 266)


6. Honorable Gale Brewer, Borough President of Manhattan, email submission dated August 17, 2018 (Comments 9, 10, 216, 235, 267)

7. Honorable Eric L. Adams, Brooklyn Borough President, letter dated August 6, 2018 (Comments 5, 71, 72, 106, 107, 196, 224, 225, 239, 265)

AGENCIES

8. Honorable C.J. Bisignano, United States Coast Guard, letter dated July 23, 2018 (Comment 3)

COMMUNITY BOARDS

9. Manhattan Community Board 2 (Lawrence), comments made at public meeting, August 6, 2018 (Comments 70, 78, 128, 180, 266, 268)

10. Manhattan Community Board 4 (Lazarin), comments received by letter dated August 2, 2018 (Comments 8, 92, 114, 116, 117, 129, 149, 152, 164, 174, 182, 195, 202, 203, 249, 259)

11. Manhattan Community Board 6 (Scheyer), comments made at public meeting, August 6, 2018 (Comments 92, 93, 94, 96, 103, 104, 105, 161, 165, 170, 187, 188, 189, 192, 198)
INTERESTED INDIVIDUALS AND ORGANIZATIONS

12. 100 Block of West 15th Street (Boddington), comments made at public meeting, August 6, 2018 and letter postmarked August 19, 2018 (Comments 59, 68)
13. 100 Block of West 18th Street (Klein), comments made at public meeting, August 6, 2018 (Comments 115, 168, 174, 240, 247)
14. 100 West 16th Street Block Association (Groncki), comments made at public meeting, August 6, 2018 (Comments 7, 63, 89, 92, 139, 149, 152, 160, 182, 186, 203, 261, 266)
15. 14th Street Coalition (Pesin), comments made at public meeting, August 6, 2018 (Comments 6, 75, 76, 138, 152, 173, 174, 234, 264)
16. 15th Street Coalition (Curtis), comments made at public meeting, August 6, 2018 (Comments 149, 170, 178, 235, 247, 254, 257, 271)
17. Broadway Residents Coalition (Davies), comments made at public meeting, August 6, 2018 (Comments 70, 91, 125, 128, 180)
18. Flatiron Alliance (Aronson), comments made at public meeting, August 6, 2018 (Comments 152, 168, 174, 182, 257)
19. Friends of Petrosino Square (Fleischer), comments made at public meeting, August 6, 2018 (Comments 108, 235, 239, 291)
20. Grand Street Democrats (Loeb), comments made at public meeting, August 6, 2018 (Comments 130, 180, 234, 235, 239, 258)
21. Kenmare Little Italy Loop Coalition (Campo), comments made at public meeting, August 6, 2018 (Comments 108, 128, 134)
22. NYCT Riders Council (Greif, C.), comments made at public meeting, August 6, 2018 (Comment 69)
23. Regional Plan Association (Barrios), comments made at public meeting, August 6, 2018 (Comment 23)
24. Transportation Alternatives (Yamada), comments made at public meeting, August 6, 2018 (Comment 180)
25. West 13th 100 Block Association (Charleston), comments made at public meeting, August 6, 2018 (Comments 163, 182, 235, 266, 270)
26. Stewart Adelson, email submission dated August 6, 2018 (Comments 1, 16, 26, 28, 138, 238, 262)
27. Andrey Akhmetov, email submission dated July 28, 2018 (Comments 105, 165, 251)
28. Jane Aldridge, email submission dated August 16, 2018 (Comment 210)
29. Warren Ashenmil, email submission dated August 5, 2018 (Comments 1, 16, 26, 28, 138, 238, 262)
30. Seth Asher, email submission dated August 16, 2018 (Comments 14, 102, 181, 210)
31. Ronit Avneri, email submission dated August 6, 2018 (Comments 168, 245)
32. Richard Awe, email submission dated August 1, 2018 (Comment 126)
33. Andres Badillo, email submission dated August 16, 2018 (Comments 60, 62)
34. Joanne Bagan, email submission dated August 9, 2018 (Comments 233, 251)
35. Natalya Bagrova, email submission dated August 9, 2018 (Comments 57, 65)
36. Lauren Banchefsky, email submission dated August 6, 2018 (Comment 165)
37. Jeff Bandman, email submission dated August 16, 2018 (Comments 54, 284)
38. Simona Bares, email submission dated August 14, 2018 and August 16, 2018 (Comment 15)
39. Yamile Barquet, email submission dated August 10, 2018 (Comment 16)
40. Hope Beach, email submission dated August 10, 2018 (Comments 67, 131)
41. Norma Bellino, email submission dated August 16, 2018 (Comments 156, 166, 174)
42. Susan Bender, email submission dated August 14, 2018 (Comment 166)
43. Jeanne Bergman, email submission dated August 16, 2018 (Comment 278)
44. George Bettman, email submissions dated July 24, 2018 and August 7, 2018 (Comments 64, 298)
45. Fred Blair, email submissions dated July 24, 2018, July 27, 2018 and August 17, 2018 (Comments 299, 300, 301)
46. Gusti Bogok, email submission dated August 18, 2018 (Comment 279)
47. Julianne Bond, email submission dated August 7, 2018 (Comments 16, 75, 115, 139, 218, 233, 246, 273)
48. Louis Boriello, comments made at public meeting, August 6, 2018 (Comment 220)
49. Catherine Boursier, email submission dated August 16, 2018 (Comments 105, 180, 202, 223)
50. Brittany Brannon, email submission dated August 23, 2018 (Comment 277)
51. Lester Brickman, email submission dated August 6, 2018 (Comment 162)
52. PJ Brooks, email submission dated August 1, 2018 (Comment 168)
53. Stanley Bulbach, email submission dated August 18, 2018 (Comment 281)
54. Jane Burbank, email submission dated August 16, 2018 (Comment 21)
55. Jaquetta Bustoin, email submission dated August 11, 2018 (Comment 57)
56. James Calimano, email submission dated August 15, 2018 (Comments 120, 121)
57. Paige Carlin, email submission dated August 6, 2018 (Comments 155, 156, 239, 246, 250)
58. David Carucci, email submission dated August 16, 2018 (Comment 219)
59. Joseph Cerrone, email submission dated August 9, 2018 (Comments 166, 252, 257, 294)
60. Jill Chastain, email submission dated August 15, 2018 (Comment 26)
61. Dasha Chestukhin, email submission dated August 16, 2018 (Comment 227)
62. Sam Chilton, email submission dated July 25, 2018 (Comment 302)
63. Mr./Ms. Clapp, email submission dated August 16, 2018 (Comment 54)
64. Curt Clausen, email submission dated August 16, 2018 (Comments 14, 102, 181, 210)
65. Jeremiah Clemente, email submissions dated July 21, 2018 and August 19, 2018 (Comments 123, 126)
66. Edna Cohen, email submission dated August 19, 2018 (Comments 138, 155, 156, 166, 176, 182, 188, 204, 235, 254, 266)
67. Nancy Collins, email submission dated August 16, 2018 (Comment 166)
68. Mary Conway, comment card submitted August 6, 2018 and email submission dated August 8, 2018 (Comment 26)
69. Fred Cooper, email submission dated August 18, 2018 (Comment 13)
70. Christine Curtis, comment card submitted August 6, 2018 (Comments 149, 170, 178, 235, 247, 254, 257, 271)
71. Rosanne D’Arrigo, email submission dated August 14, 2018 (Comment 234, 246)
72. Peter Davies, email submission dated August 15, 2018 (Comments 70, 91, 125, 128, 180)
73. Richard Davis, email submission dated August 15, 2018 (Comments 138, 166, 174, 221, 232)
74. Kevin Davison, commend card submitted August 6, 2018 (Comment 183, 228)
75. Rachel Demas, email submission dated August 8, 2018 (Comments 157, 176, 233, 239, 250, 251, 257)
76. Stephanie Dennett, email submission dated August 14, 2018 (Comment 166)
77. Adriana de Riva, email submission dated August 10, 2018 (Comments 138, 184, 256)
78. Jill Diamond, email submission dated August 6, 2018 (Comment 166)
79. Jacalyn Dinhofer, comments made at public meeting, August 6, 2018 and email submission dated August 6, 2018 (Comments 98, 110, 149, 202, 247, 257)
80. Kyle Dolan, email submission dated August 8, 2018 (Comment 57)
81. David Donen, email submission dated August 8, 2018 (Comment 261)
82. Sarah Dowson, email submission dated August 13, 2018 (Comments 87, 145)
83. Don Duerr, email submission dated August 4, 2018 (Comments 155, 175, 176, 204, 216, 233)
84. Olivia Duerr, email submission dated August 3, 2018 (Comments 155, 175, 176, 204, 216, 233)
85. Gary Edwards, email submission dated August 8, 2018 (Comments 53, 176, 210, 233)
86. Mitch Epstein, email submission dated August 16, 2018 (Comment 128)
87. Alberto Errera, email submission dated August 5, 2018 (Comments 168, 244)
88. Isabel Espina, email submission dated August 14, 2018 (Comment 118)
89. Ken Ettinger, email submission dated August 5, 2018 and comment card submitted August 6, 2018 (Comments 270, 275)
90. Al Fei, email submission dated August 19, 2018 (Comment 13)
91. George Feinn, email submission dated August 14, 2018 (Comments 8, 172, 174, 263, 271)
92. Stephen Feldman, email submission dated August 11, 2018 (Comments 86, 166, 207)
94. Peter Ferko, email submission dated August 6, 2018 (Comment 57)
95. Susan Finley, email submission dated August 6, 2018 and letter submission dated August 10, 2018 (Comments 168, 176, 233, 245, 292)
96. Georgette Fleischer, comments made at public meeting, August 6, 2018 and email submission dated August 16, 2018 (Comments 108, 235, 239, 291)
97. Judith Flynn, email submission dated August 13, 2018 (Comment 177)
98. Nancy Foldi, email submission dated August 6, 2018 (Comments 170, 171, 233, 248)
100. Gail Fox, email submission dated August 1, 2018 (Comments 2, 204)
101. Bert Francois, email submission dated July 26, 2018 (Comment 197)
102. R. Gaffney, email submission dated August 6, 2018 (Comment 239)
103. Louise Galleshaw, email submission dated August 10, 2018 (Comments 147, 173, 234)
104. Adam Garth, comments made at public meeting, August 6, 2018 (Comment 254)
105. Roberta Gelb, comments made at public meeting, August 6, 2018 (Comments 174, 182, 239)
106. Peter Gentile, email submission dated August 14, 2018 (Comment 144)
107. David-Paul Gerber, email submission dated August 15, 2018 (Comment 208)
108. Ken Glasgow, email submission dated August 5, 2018 (Comments 62, 288, 289)
109. Michael Glassman, email submissions dated August 2, 2018 and August 15, 2018 (Comments 115, 163, 238, 248, 257)
110. Christopher Godfrey, comments made at public meeting, August 6, 2018 (Comments 266, 270)
111. Rosemary Goldford, email submissions dated August 5, 2018, August 12, 2018, August 14, 2018, and August 15, 2018 (Comments 59, 144, 155, 204)
112. Larissa Gonzalez, email submission dated August 5, 2018 (Comments 169, 176, 257)
113. Neil Goodwin, comments made at public meeting, August 6, 2018 (Comments 68, 114, 219)
114. April Greene, email submission dated August 7, 2018 (Comment 57)
115. Joyce Greenhaus, email submission dated August 18, 2018 (Comments 176, 221)
116. Mike Greenhaus, email submission dated August 1, 2018 (Comments 215)
117. Shelley Greenhaus, email submission dated August 20, 2018 (Comments 138, 177, 217)
118. Christopher Greif, email submission dated July 20, 2018 and comment card submitted August 6, 2018 (Comment 69)
119. Debra Greif, comments made at public meeting, August 6, 2018 (Comment 272)
120. Paul Groncki, comments made at public hearing August 6, 2018 and email submission dated August 6, 2018 (Comments 7, 63, 89, 92, 139, 149, 152, 160, 182, 186, 203, 261, 266)
121. Mitchell Grubler, email submission dated August 10, 2018 (Comments 77, 134)
122. Judy Gruen, email submission dated August 12, 2018 (Comment 146)
123. Ralph Gurkin, email submission dated August 18, 2018 (Comment 79)
124. David Hales, email submission dated August 16, 2018 (Comments 105, 180, 202, 223)
125. Jane Hall, email submission dated August 9, 2018 (Comment 221)
126. James Harmon, comments made at public meeting, August 6, 2018 and email submissions dated August 4, 2018 and August 19, 2018 (Comments 149, 166, 168, 174, 177)
127. Mike Hartigan, email submission dated August 19, 2018 (Comment 148, 152, 182, 235)
128. Kala Harvey, email submission dated August 19, 2018 (Comments 115, 156)
129. Mary Hawkins, email submission dated August 16, 2018 (Comment 226)
130. Dennis Hernandez, email submission dated August 16, 2018 (Comments 14, 85, 210)
131. Catherine Hoch, mail submission dated August 20, 2018 (Comments 146, 162, 219)
132. Glen Holtzer, email submission dated August 17, 2018 (Comments 43, 140, 204)
133. Richard Howard, email submission dated August 8, 2018 (Comments 53, 148, 176)
134. William Huebsch, email submission dated August 9, 2018 (Comments 74, 84, 97, 88, 109, 119, 254)
135. Seth Ingall, email submission dated August 14, 2018 (Comments 44, 115, 172, 177, 266)
136. Mr./Ms. Jacques, email submission dated August 20, 2018 (Comments 138, 177, 217)
137. Barbara Jaffe, email submission dated August 14, 2018 (Comments 149, 235, 246)
138. Liam Jeffries, comments made at public meeting, August 6, 2018 (Comments 4, 19)
139. Doug Jensen, email submission dated August 19, 2018 (Comments 138, 166)
140. Mary Kay Jezzini, email submissions dated August 10, 2018 and August 16, 2018 (Comments 153, 177)
141. Chris Johnson, email submissions dated August 12, 2018 and August 16, 2018 (Comment 200)
142. George Jones, email submission dated August 22, 2018 (Comments 137, 138)
143. Paul Kahn, email submission dated August 17, 2018 (Comments 44, 140, 155, 156, 166, 173, 254)
144. Richard Kahn, email submission dated August 16, 2018 (Comment 20)
145. Dimitrios Kariotis, email submission dated August 10, 2018 (Comment 217)
146. Greg Keller, email submission dated August 16, 2018 (Comments 14, 102, 181, 210)
147. Bob Klein, email submission dated August 8, 2018 (Comments 137, 204)
148. Judy Klein, comments made at public meeting, August 6, 2018 and email submission August 19, 2018 (Comments 115, 168, 174, 240, 247)
149. Joshua Kneidl, email submission dated August 20, 2018 (Comments 105, 180, 181, 202, 210)
150. Kim Landsman, email submission dated August 16, 2018 (Comment 282)
151. Jennifer Lauzon, email submission dated August 22, 2018 (Comment 297)
152. Marnia Lawrence, comments made at public meeting, August 6, 2018 and email submission dated August 18, 2018 (Comments 70, 78, 128, 180, 266, 268)
153. Ignatius Leone, email submission dated August 18, 2018 (Comment 24)
154. Barbara Lidsky, email submission dated August 10, 2018 (Comments 140, 219)
155. Joshua Lieberman, email submission dated August 6, 2018 (Comments 1, 16, 26, 28, 138, 238, 262)
156. Janet Liff, email submission dated August 16, 2018 (Comments 13, 92, 140, 186)
157. Nancy Llewellyn, email submission dated August 8, 2018 (Comments 53, 154)
158. Allan Lunceford-Stevens, email submission dated August 16, 2018 (Comments 14, 102, 181, 210)
159. Holly Maloney, email submission dated August 8, 2018 (Comment 78)
160. Victor Malyar, email submission dated July 25, 2018 (Comment 287)
161. Galia Mann-Heilscher, email submission dated August 7, 2018 (Comment 57)
162. Rita Maras, email submission dated August 19, 2018 (Comments 62, 263, 296)
163. David Marcus, email submission dated August 15, 2018 (Comments 149, 174, 219, 247, 257, 266, 270)
164. Alex Marenson, email submission dated August 13, 2018 (Comments 54, 280)
165. Micky Markovitz, email submission dated August 11, 2018 (Comments 128, 132, 135)
166. Martin Markowitz, email submission dated August 2, 2018 (Comment 156)
167. Rolf Martin, email submission dated August 19, 2018 (Comment 105, 241)
168. Ross Martin, email submission dated August 16, 2018 (Comments 222)
169. Eileen McCarthy, email submission dated August 10, 2018 (Comments 27, 155, 174)
170. Gwynne McCue, email submission dated August 6, 2018 (Comments 166, 176, 186, 239, 246, 248, 250, 257)
171. Dylan McGregor, email submission dated August 7, 2018 (Comment 57)
172. Sharon Mear email submission dated August 21, 2018 (Comment 138)
173. Butch Merigo, email submission dated August 7, 2018 (Comment 57)
174. Marina Metalios, email submission dated August 3, 2018 (Comments 165, 179)
175. Lewis Meyers, email submission dated August 14, 2018 (Comment 308)
176. Georgi Michele-Curry, comments made at public meeting, August 6, 2018 and email submission dated August 16, 2018 (Comment 140)
177. Shawn Miller, email submission dated August 6, 2018 (Comment 309)
178. Barbara Minsky, email submission dated August 10, 2018 (Comment 79)
179. John Moers, email submission dated August 14, 2018 (Comment 144)
180. Mark Moss, email submission dated August 15, 2018 (Comments 61, 95, 124, 283)
181. Robert Moulthrop, letter submission dated August 10, 2018 (Comment 1)
182. David Mulkins, email submission dated August 18, 2018 (Comment 166)
183. Kevin Murphy, email submission dated August 10, 2018 (Comments 2, 60)
184. Robert Myrstad, email submission dated August 14, 2018 (Comments 122)
185. E. Diane Nichols, email submission dated August 15, 2018 (Comments 79, 128, 257)
186. Kristin Ng, email submission dated August 2, 2018 (Comment 155)
187. S. Norris, email submission dated August 7, 2018 (Comment 54)
188. Kara Nowakowski, email submission dated July 20, 2018 (Comments 211, 232)
189. Michael O., email submission dated August 16, 2018 (Comment 77)
190. Kristen Oddo, email submission dated August 7, 2018 (Comment 310)
191. Salvatore Padula, email submission dated August 18, 2018 (Comment 280)
192. Susan Paston, email submission dated August 15, 2018 (Comment 209)
193. Jatin Patel, email submission dated August 5, 2018 (Comments 148, 233, 239, 246)
194. Joseph Patton, email submission dated August 14, 2018 (Comment 206)
195. Edwin Penafort, email submission dated July 23, 2018 (Comment 55)
196. Jennifer Pennline, email submission dated August 7, 2018 (Comment 311)
197. Frank Perich, email submission dated August 14, 2018 (Comments 138, 202)
198. Gilda Pervin, email submission dated August 8, 2018 (Comments 77)
199. Judith Pesin, comments made at public meeting on August 6, 2018, letter submission dated August 14, 2018, and email submissions dated August 8, 2018 and August 19, 2018 (Comments 6, 75, 76, 77 138, 152, 173, 174, 234, 264)
200. Gregory Prata, email submission dated August 13, 2018 (Comment 1)
201. Wilson Prieve, email submission dated August 10, 2018 (Comment 66)
202. Karyn Reynolds, comments made at public meeting, August 6, 2018 (Comments 69, 204)
203. Phillip Riback, email submission dated August 16, 2018 (Comment 22)
204. Sharon Riley, email submissions dated August 3, 2018 and August 9, 2018 (Comments 76, 150, 156, 168, 176, 186, 233, 260, 276)
205. Matthew Robinson, comments made at public meeting, August 6, 2018 (Comments 108, 202, 253)
206. Barbara Katz Rothman, email submission dated August 16, 2018 (Comments 14, 102, 181, 210)
207. Paul A. Rubinstein, email submission dated August 10, 2018 (Comment 140)
208. Deb Ryan, email submission dated August 8, 2018 (Comments 28, 151, 158, 168, 262)
209. Patrick Ryan, email submissions dated July 25, 2018 and August 17, 2018 (Comments 312, 313)
210. Gary Sacks, email submission dated August 14, 2018 (Comment 155)
211. Lawrence Scheyer, email submission dated August 6, 2018 (Comments 92, 93, 94, 96, 103, 104, 105, 161, 165, 170, 187, 188, 189, 192, 198)
212. Jeanne Schindelheim, comments made at public meeting, August 6, 2018 (Comment 244)
213. Alan Schlesinger, email submission dated August 2, 2018 (Comments 166, 263)
214. Naomi Schneider, email submission dated August 15, 2018 (Comment 1)
215. Roberta Schnur, email submission dated August 18, 2018 (Comment 143)
217. Maximillian Sholl, email submission dated August 16, 2018 (Comment 105, 180, 202, 210)
218. David Skurnik, email submission dated August 13, 2018 (Comments 138, 166, 173)
219. Ryan Smith, email submission dated August 16, 2018 (Comment 14)
221. J.E. Standish, email submissions dated August 8, 2018 and August 16, 2018 (Comment 77)
222. Lucille Strider, email submission dated August 6, 2018 (Comments 155, 159, 185, 248)
223. Luke Szabados, email submission dated August 6, 2018 (No Comments)\(^1\)
224. Anya Szykitka, email submission dated August 5, 2018 (Comment 57)
225. David Teich, email submission dated August 1, 2018 (Comment 212)
226. Lora Tenenbaum, email submission dated August 19, 2018 (Comments 70, 77, 113, 128, 132, 135, 149, 191, 202, 205, 234, 268, 269)
227. Steven Thomson, email submission dated August 7, 2018 (Comment 57)
228. Gary Tomei, email submission dated August 16, 2018 (Comments 1, 149, 166, 174, 220, 239)
229. Valerie Toscano, email submission dated August 14, 2018 (Comment 144)
230. Christine Tralongo, email submission dated August 2, 2018 (Comments 204, 220)
231. Patty Troup, email submission dated August 5, 2018 (Comments 167, 176, 204)
232. Linda Tyrer, email submissions dated August 2, 2018 and August 3, 2018 (Comments 148, 168, 233, 251)
233. Patricia Valenti, email submission dated August 9, 2018 (Comment 263)
234. Omar Vera, comments made at public meeting, August 6, 2018 (Comment 82)
235. Linden Wallner, email submission dated July 23, 2018 (Comment 286)
236. John Wetherhold, email submission dated August 18, 2018 (Comment 229)
237. Carolyn Wheatley, email submission dated August 11, 2018 (Comment 246)
238. Denise Whelan, email submission dated July 25, 2018 (Comment 290)
239. J. Rebecca White, email submission dated August 7, 2018 (Comment 57, 262)
240. Brent Whitman, email submission dated August 11, 2018 (Comments 138, 166, 177)
241. Matthew Williams, email submission dated August 14, 2018 (Comments 43, 149, 174, 234, 246, 266, 271, 295)
242. Sabrina Wolfson, email submission dated August 9, 2018 (Comment 80)
243. Anita Wortman, email submission dated August 1, 2018 (Comments 76, 87, 159, 186, 203, 204, 213, 239, 246, 250, 261, 274)
244. James Wright, email submission dated August 9, 2018 (Comments 111, 133, 205)
245. Laura Zampa, email submission dated August 16, 2018 (Comment 228)
246. Andrea Zieher, email submission dated August 15, 2018 (Comments 90, 144)
247. Anna Ziourova, email submission dated August 1, 2018 (Comment 18)
248. Gregg Zuman, email submission dated July 26, 2018 (Comment 199)

\(^1\) Comment was “From Manhattan Community Board Five.” Since there were no formal comments from Community Board 5 during the SEA comment period, there were no comments to respond to.
INDIVIDUALS SUBMITTING FORM LETTERS

A number of form letters were submitted in support of positions put forward by Transportation Alternatives. The following individuals signed their names to the form letter and their comments can be found in Section C, Comments 13, 31, 101, 105, 222, 223, and 293:

249. Ramon Acosta, letter submission dated August 18, 2018
250. Gerald Adasavage, letter submission dated August 18, 2018
251. John Amaral, letter submission dated August 22, 2018
252. Frederich B., letter submission dated August 18, 2018
253. Steve Beck, letter submission dated August 18, 2018
254. Sam Bleiberg, letter submission dated August 9, 2018
255. Calvin Brown, letter submission dated August 10, 2018
256. Melodie Bryant, letter submission dated August 9, 2018
257. Jessica Chung, letter submission dated August 18, 2018
258. Gavin Compton, letter submission dated August 18, 2018
259. Carol Cranford, letter submission dated August 17, 2018
260. Lindsey Daniels, letter submission dated August 18, 2018
261. Rebecca Davis, letter submission dated August 19, 2018
262. Maria Duarte-Veronese, letter submission dated August 18, 2018
263. Alexandra Ebright, letter submission dated August 19, 2018
264. John G., letter submission dated August 18, 2018
265. Jason Gers, letter submission dated August 9, 2018
266. Abraham Greene, letter submission dated August 18, 2018
267. Ben H., letter submission dated August 17, 2018
268. Michael Hogg, letter submission dated August 18, 2018
269. Andrew Hyatt, letter submission dated August 9, 2018
270. Chris Janar, letter submission dated August 20, 2018
271. Liam Jeffries, letter submission dated August 9, 2018
272. Dona Johnson, letter submission dated August 18, 2018
273. Anthony Kelley, letter submission dated August 18, 2018
274. Tiernan Kennedy, letter submission dated August 18, 2018
275. Elizabeth Lampert, letter submission dated August 18, 2018
276. Spencer Lawrence, letter submission dated August 18, 2018
277. Sophia Leenay, letter submission dated August 18, 2018
278. Philip Leff, letter submission dated August 18, 2018
279. Matt M., letter submission dated August 18, 2018
280. Derek Magee, letter submission dated August 9, 2018
281. Dinita Mapp, letter submission dated August 18, 2018
282. Todd Medelinos, letter submission dated August 18, 2018
283. Jay Murdoch, letter submission dated August 18, 2018
284. Susan Nakely, letter submission dated August 18, 2018
285. Mike Odenthal, letter submission dated August 18, 2018
286. Kerry Ojakian, letter submission dated August 18, 2018
287. Julia Quinn, letter submission dated August 18, 2018
288. Teddy Quinn, letter submission dated August 18, 2018
289. Amy R., letter submission dated August 18, 2018
290. Josh R., letter submission dated August 18, 2018
291. Raimo Reese, letter submission dated August 18, 2018
292. Diego Rodriguez, letter submission dated August 18, 2018
293. Brian Rogers, letter submission dated August 10, 2018
294. Adam Sacarny, letter submission dated August 9, 2018
295. Gary Schutz, letter submission dated August 18, 2018
296. Michele Siegel, letter submission dated August 18, 2018
297. Dan Stautafuer, letter submission dated August 18, 2018
298. James Stevens, letter submission dated August 19, 2018
299. Louis Tenjo, letter submission dated August 18, 2018
300. Ina Thompson, letter submission dated August 18, 2018
301. Leah Todd, letter submission dated August 18, 2018
302. Steve Tranter, letter submission dated August 18, 2018
303. Gerardo Valencia, letter submission dated August 18, 2018
304. Ariana Venegas, letter submission dated August 18, 2018
305. Chelsea Yamada, letter submission dated August 9, 2018
306. Sheryl Yvette, letter submission dated August 18, 2018
307. Samantha Zurbriggen, letter submission dated August 18, 2018
308. Niki (no last name), letter submission dated August 18, 2018
C. Comments and Responses

COMMENTS ON FEDERAL ENVIRONMENTAL REVIEW PROCESS

Comment 1. I am formally writing to request that the Federal government require that an Environmental Impact Study be done to better understand the entirety of the impact of the MTA and NYCDOT proposed mitigations plans. All of this is being planned without a proper environmental study of the impact the proposed changes will have on the local communities. (Prata, Winkler, Moulthrop, Adelson, Lieberman, Schneider, Tomei, Ashenmil)

Response: The FTA, as federal lead agency, prepared the Supplemental Environmental Assessment to evaluate the potential environmental consequences of implementing the ASP and has considered agency and public comments. No significant impacts were identified; therefore, a supplemental Environmental Impact Statement (EIS) is not required. The SEA and its summary Finding of No Significant Impact (FONSI) represents a hard and balanced look at the effects of the ASP relative to the No Action Alternative in which the tunnel is closed with no substantial transportation options provided.

Comment 2. When do you actually respond to public comment? How are these public meetings useful if we don't get to engage you in a back and forth? Please explain how the agencies are utilizing the resolutions on L train closure commentary from local community boards. (Fox, Murphy)

Response: As detailed in the SEA (Section 9) and SEA Appendix C (Public Outreach Supplemental Information), the MTA NYCT and NYCDOT have held many public forums in 2017 and 2018 including with all the community boards in the L train ridership area. These forums encouraged a public dialogue and the agencies used public input to evaluate and inform the development and planning of the ASP. Pursuant to standard protocol of the environmental review process, comments received at public meetings held specifically to allow the public to provide comment on the SEA and project as well as comments received in writing are accepted and recorded without an instant response. All relevant comments are responded to as part of a formal document (Response to Comments) which is used by the lead agency in its deliberation and determination of its findings pursuant to the Council on Environmental Quality (CEQ) regulations implementing NEPA and FTA regulations under 23 CFR Part 771. This Response to Comments is an attachment to the FONSI and was reviewed and integrated into the findings by the FTA.

Comment 3. Should any work related to bridge improvements over the East River or any other navigable waterway be conducted, to ensure that the needs of marine navigation are considered during construction, it is imperative that we continue to be included in construction planning and scheduling. See the USCG Bridge Administration—General Construction Requirements should any work above or on a navigable waterway be necessary. (Bisignano, United States Coast Guard)

Response: No bridge improvements are currently planned as part of the Proposed Action. Coordination with USCG Bridge Administration will take place should any work
related to bridge improvements over the East River or any other navigable waterway be included as part of the Proposed Action.

OVERALL COMMENTS ON SEA OR ASP

Comment 4. The SEA properly documents the benefits and impacts of the proposed ASP. The ASP will provide benefits to pedestrians in Manhattan. We appreciate the opportunity to submit comments to the SEA and ask that your agencies explore ways to minimize traffic congestion and air and noise pollution through this assessment. We appreciate that the shutdown of the L train will present significant challenges. We thank you for including our comments in the SEA and look forward to working with you in the months ahead to ensure that we meet those challenges head-on. (Jeffries, Glick, Johnson, Gottfried, Rivera, Hoylman, Powers)

Response: The proposed ASP was developed to minimize traffic congestion, air and noise impacts, compared to the No Action Alternative. MTA NYCT, in coordination with NYCDOT, will monitor traffic conditions in a dynamic and responsive manner to minimize traffic impacts. MTA NYCT commits to operating subway service on subway lines in the robust service pattern described in the SEA to ensure that as many diverted L train customers can be accommodated within the subway system as possible, to ensure impacts to traffic flow are not significant.

Comment 5. With the upcoming shutdown of the L train Canarsie Tunnel in April of 2019, it is imperative that residents and commuters have alternative modes of transportation provided to them. As the MTA prepares for the upcoming shutdown, it is imperative that all necessary accommodations be made for residents and commuters to mitigate the impacts of the project. (Adams)

Response: The purpose and need of the ASP is to provide transportation alternatives to the greatest number of diverted L train riders to the maximum extent possible.

Comment 6. MTA is not addressing the residents’ concerns regarding pollution, safety, congestion, access for emergency vehicles, and the impact of diverted vehicles, especially trucks, onto neighboring side streets. We’ve asked for alternative solutions that address our concerns but none have been considered in the SEA. The ASP should balance benefits and impacts against needs of residents. (Pesin)

Response: The SEA provided an assessment of potential environmental impacts throughout the affected area. The proposed ASP has been designed to balance the needs of affected riders with potential impacts to residents of the affected area. Specific responses to concerns regarding air quality, traffic impacts and emergency vehicle access are found in the relevant sections below, as well as in the SEA and FONSI.

Comment 7. The 100 West 16th Street Block Association is appreciative of the efforts being done to repair the Canarsie Tunnel, but has concerns regarding the ASP and the traffic on side streets. (Groncki)

Response: Comment noted. Specific responses to concerns regarding traffic on side streets can be found in Response to Comment 115, below, as well as Section 6.1.3.2 of the SEA.
Comment 8. We request that you share again the methodology used to extrapolate trips from the collected swipe data. Data used to formulate plans were collected in 2009 and no new studies were fielded. (Community Board 4, Feinn)


Comment 9. I want to reiterate my support for the DOT’s plan to turn 14th Street into a Busway that mostly restricts private vehicle traffic, and am reiterating my call for the Busway to be in effect 24/7. I also would like to draw attention to the disproportionately negative effect that instituting a Busway solely during peak hours will have on low-income workers, who are more likely to travel outside of traditional business hours. (Brewer)

Response: Based on hourly traffic volumes on the Williamsburg Bridge and along 14th Street summarized in Appendix E of the SEA, the ASP does not consider the busway and HOV restrictions to be necessary for a full 24-hour day. As noted in Section 8 of the SEA, MTA NYCT, in coordination with NYCDOT, would monitor traffic conditions during the approximate 15-month shutdown in a dynamic and responsive manner. This includes potentially making adjustments to traffic approaches and adjusting restriction times on Williamsburg Bridge and on 14th Street, as well as other adjustments as needed, to optimize performance in order to minimize impacts.

Comment 10. I also reiterate my support for the DOT’s plan to make the Williamsburg Bridge HOV3 and would like to once again call for the DOT and the MTA to study the effects of expanding HOV3 restrictions to all of the East River bridges during this time period, an idea supported by a number of community boards in Manhattan who rightfully fear excessive traffic at the other crossings. Additionally, I continue to stand in support of the DOT’s plans to institute protected bike lanes on 12th and 13th Streets. (Brewer)

Response: As stated in Section 6.1.3.2 of the SEA, “[t]he distribution of potential diverted trips to other East River crossings would create temporary increases in traffic volumes on these facilities and localized street networks serving the crossings. Because these conditions would last for only 15 months, and drivers would be expected to adjust their travel activities over the course of the temporary construction period, and since overall travel patterns would not change significantly, these conditions would not result in significant adverse environmental impacts.” As noted in Section 8 of the SEA, MTA NYCT, in coordination with NYCDOT, would monitor traffic conditions during the approximate 15-month shutdown in a dynamic and responsive manner. This includes potentially making adjustments to traffic approaches and adjusting restriction times on Williamsburg Bridge and on 14th Street, as well as other adjustments as needed, to optimize performance in order to minimize impacts.

Comment 11. Councilmember Carlina Rivera has proposed that NYCDOT work with NYPD and garage owners to distribute decals for car owners who store their cars at garages affected by the implementation of the Busway—I support this idea. (Epstein)

Response: As described in Section 5.2.3.2, “14th Street Corridor Bus Enhancement,” of the SEA, the current operational plan for the busway would allow local access, including into garages on 14th Street. A decal would not be necessary to gain local access.
**Comment 12.** NYCDOT and MTA should consider providing zones where riders can board, or making exceptions for ADA-compliant taxis and other FHV’s to make pick-ups along the corridor. (Epstein)

**Response:** This is consistent with the ASP. As described in Section 5.2.3.2, “14th Street Corridor Bus Enhancement,” of the SEA, the current operational plan for the busway would allow any vehicle to make local deliveries or pick-up and drop-offs along 14th Street using the designated curbside loading zones.

**Comment 13.** Restrict private car use entering Manhattan. HOV 3+ or Busways only across the Williamsburg Bridge, and extend these permissions to other bridges that access Manhattan. (Transportation Alternatives, Cooper, Fei, Liff)

**Response:** As noted in Section 8 of the SEA, MTA NYCT, in coordination with NYCDOT, would monitor traffic conditions during the approximate 15-month shutdown in a dynamic and responsive manner. This includes potentially making adjustments to traffic approaches and adjusting restriction times on Williamsburg Bridge and on 14th Street, as well as other adjustments as needed, to optimize performance in order to minimize impacts.

**Comment 14.** Request for exclusive 24-hour busways on 14th Street and Williamsburg Bridge. HOV3+ restrictions on the Williamsburg Bridge at all times will keep L train riders moving via mass transit. (Keller, Lunceford-Stevens, Clausen, Rothman, Asher, Smith, Hernandez)

**Response:** Based on hourly traffic volumes on the Williamsburg Bridge and along 14th Street summarized in Appendix E of the SEA, the ASP does not consider the busway and HOV restrictions to be necessary for a full 24-hour day. As noted in Section 8 of the SEA, MTA NYCT and NYCDOT would monitor traffic conditions during the approximate 15-month shutdown in a dynamic and responsive manner and adjust traffic approaches to optimize performance in order to minimize impacts.

**Comment 15.** I strongly object to making the Williamsburg Bridge practically a full time HOV3+ crossing 7 days a week. Please give us a break at least on the weekends. (Bares)

**Response:** The HOV3+ restrictions to the Williamsburg Bridge are anticipated to increase the efficiency and decrease travel time for the proposed L interborough bus service and would help ease the effect of the additional buses on local traffic networks adjacent to the bridge once the restrictions are implemented and drivers adjust to the change. Weekend vehicle volumes approach weekday volumes on the Williamsburg Bridge, so there is also a need to have HOV restrictions on weekends. However, MTA NYCT, in coordination with NYCDOT, would monitor traffic conditions in a dynamic and responsive manner potentially making adjustments. Please see Response to Comment 14 above, as well as Section 8 of the SEA.
Comment 16.
The MTA/DOT has failed to come up with a plan that balances the needs of displaced commuters with those of local businesses and residential communities within the 14th Street corridor and downtown. I believe the SEA fails significantly to address environmental concerns of my neighborhood. (Adelson, Barquet, Bond, Lieberman, Ashenmil)

Response:
The proposed ASP has been designed to balance the needs of affected riders with potential impacts to residents and businesses of the affected area. MTA NYCT, working collaboratively with NYCDOT, have developed a plan based on extensive outreach (including meetings, letters, e-mails, web-site) to affected communities and modified the ASP as it was developed to reflect specific community suggestions. Specific modifications that have been made to the ASP include allowance for local access to 14th Street; splitting the proposed bicycle lane on 13th Street into two one-way bicycle lanes on 12th Street and 13th Street; adding the L4 interborough bus route; and adding the Union Avenue bus stop on the L1 and L2 bus routes. The ASP as presented in the SEA reflects those modifications. Appendix C of the SEA identifies 70 separate meetings held beginning in May 2017 and continuing to the present day.

Comment 17.
The closure of the Canarsie Tunnel for the repairs needed in the aftermath of Superstorm Sandy, while necessary, will cause a major disruption to our city’s transit ecosystem. My staff and I have been working closely with the MTA, the DOT, the L Train Coalition, the 14th Street Coalition, and several other community groups to devise the most efficient way to mitigate the shutdown’s disruptive effects. I am pleased to note that the ASP detailed in the SEA has incorporated several of the suggestions that I, and members of the community, have made during these productive discussions. I would like to thank the MTA in listening to New Yorkers and modifying their plans accordingly, as they should continue to do so going forward. (Maloney)

Response:
Comment noted.

Comment 18.
Whatever changes happen affecting traffic on 14th Street must be changed back after the L renovation is over. Traffic must resume in the same way on 14th Street (so it won't affect neighboring streets indefinitely). Can this be put in writing and agreed on please. (Ziourova)

Response:
The SEA identifies measures under the Proposed Action that would be temporary and measures that would be permanent (see Table 1 of Section 4, “Analytical Framework,” of the SEA). The M14 Select Bus Service (SBS), SBS street treatments and conversion of 14th Street to a busway would all be temporary. As described in Section 5.2.3.2, “14th Street Corridor Bus Enhancements,” of the SEA, after the end of the tunnel closure, MTA NYCT and NYCDOT would end the temporary M14 SBS. MTA and NYCDOT may consider implementation of a permanent M14 SBS as a separate independent project. Additional planning, agency coordination, public outreach, and/or appropriate environmental analysis of this potential permanent change would occur at a later point, if MTA NYCT and NYCDOT decide to undertake these permanent activities.
Comment 19. I am in support of the SEA and that it will improve lives of those who commute throughout 14th Street area, and will give pedestrians and bikes priority over cars. The project must be done as soon as possible to protect against future storms. (Jeffries)

Response: Comment noted.

Comment 20. 14th Street should be for pedestrians, bicycles, emergency vehicles and public transit only, with commercial access during restricted hours. (Kahn)

Response: The proposed ASP provides access for buses, emergency vehicles, pedestrians, bicycles, and local access deliveries or drop-off/pick-up at all times on 14th Street. Based on public input and other factors as the ASP was developed, MTA NYCT and NYCDOT have determined that a broader accessibility for local residents and businesses with specific local destinations can use 14th Street without adversely affecting bus operations.

Comment 21. I support the conversion of 14th Street with dedicated and protected bike lanes in two directions, dedicated fast bus lanes in two directions, absolute minimum numbers of non-bus motor vehicles, provision for delivery services and pick-ups that will not cut off bike or bus lanes. There should ideally be dedicated, protected crosstown bike lanes on 13th Street and 15th Street. (Burbank)

Response: ASP planning determined that safer and more efficient operation of the busway would be to not have dedicated bicycle lanes on 14th Street, which is why the temporary pair of one-way bicycle lanes would be on 12th Street and 13th Street. The ASP would allow for local non-bus emergency or Access-a-Ride vehicles to access 14th Street with restrictions and enforcement of through travel.

Comment 22. When people can't move in the city, businesses lose money, and tax yields decrease. This is bad for people, business and the government of the city. Keep people moving during the L train shutdown—buses, bikes, pedestrians and keep the cars off of 14th Street. (Riback)

Response: MTA NYCT determined that the proposed ASP would provide transportation alternatives to the greatest number of diverted L train riders during the approximate 15-month shutdown.

Comment 23. Regional Plan Association has followed the evolution of the mitigation plan and commend MTA and DOT’s work. The transit alternatives and street treatments proposed will make the 15-month closure of the L train stations in Manhattan an opportunity rather than a logistical nightmare, but we urge you to continue listening to the public. The upgrades to train and ferry service, as well as station improvements proposed by the MTA and DOT, are the collective results of intensive research, public engagement, and vigorous advocacy. Bus priority lanes on 14th Street and the addition of one-way bicycle lanes on 12th and 13th Streets will not only benefit bus and bicycle riders, but it will also help pedestrians. The FTA report confirms that this part of the plan will substantially improve pedestrian circulation on 14th Street. (Barrios)

Response: Comment noted.
Comment 24. It's unlikely that so many outer borough passengers coming by bus over the east river bridges will then continue in the city riding parallel the river to transfer to a 14th Street bus to then transfer to a subway train. It's probable that a quicker transfer will be to a subway station closer to the bridge they traveled over. Ferry passengers will arrive on 14th Street should be accommodated with additional buses and not requiring 14th Street reconfiguration. (Leone)

Response: Section 5.2.1, “Estimated Demand for Proposed ASP Elements,” and Appendix E of the SEA summarize data used to guide development of the ASP. It is correct that the majority of Brooklyn L train riders would not wind up on a 14th Street bus. Nevertheless, it is expected that 11 percent—or 25,500—of Brooklyn to Manhattan L train riders would do so, mostly arriving by ferry, or travelling across 14th Street from a subway connection, particularly to or from First Avenue. In addition, an expected 28,500 current intra-Manhattan L train riders, as well as the 30,000 existing M14A and M14D riders, are projected to use 14th Street buses, for a total of 84,000 weekday riders. This would make 14th Street by far the busiest bus corridor in New York City. To accommodate that demand requires the busway treatment to provide sufficient capacity and travel time savings to absorb the additional ridership. Having no bus priority on 14th Street would make commutes slower for riders on the ferry, sending those riders onto the L3 and L4 buses and the subway network. This would increase the level of crowding on the subway and interborough buses to a level above NYCT’s passenger loading guidelines.

Comment 25. Is it possible that during the shutdown, LIRR diesel trains can terminate either at Jamaica or Woodside where riders at Woodside can have the opportunity of boarding either a Number 7 local or express train at 61 St/Woodside and maybe close the Hunters Point Avenue station during the Canarsie tunnel shutdown? Why hasn’t the shutdown study looked at LIRR commuters who use the Hunters Point Avenue station as this is going to have a major impact for LIRR riders who must deal with additional L train riders who will transfer to and from the G train at Court Square and the Number 7 train, and dealing with the overcrowded Number 7 trains at Hunters Point Avenue. (Follo)

Response: As shown in Table 1 in Section 4, “Analytical Framework,” of the SEA, the No Action Alternative and ASP would temporarily increase G train service serving Williamsburg (from 9 trains per hour [tph] to 12 tph between Church Av/18 Av and Court Sq and additional 3 tph between Bedford-Nostrand Avs and Court Sq). G trains would be lengthened to further increase capacity. Off-peak service on the 7 train would be temporarily increased and there would be free MetroCard transfers between G and 7 trains at 21 St/Hunters Point Av in addition to the in-system transfer between the G and E/M/7 at Court Sq. The projected ridership volumes for both the No Action Alternative and the ASP (which are shown in Table 8 in Section 6.1.1.2 of the SEA) takes into account current subway customers, including those transferring between the LIRR and the 7 train at Hunters Point Av. The projected volume-to-capacity ratio of the 7 train with the ASP at Vernon Blvd-Jackson Av is within NYCT passenger loading guidelines.
Comment 26. Please consider doing this very important, much needed L train repair work during evening hours and on weekends as the potential for a bottleneck not only on 14th Street, but also on 17th Street is guaranteed. With several schools on 17th between 5th and 9th avenues (one serving children with special needs), and on 22nd Street, school bus traffic jams alone present major problems and that happens daily without an L train shut down. (Adelson, Chastain, Conway, Lieberman, Ashenmil)

Response: As described in the Canarsie Tunnel Rehabilitation Project (L Tunnel Reconstruction) Alternatives Analysis (Appendix A of the SEA), night and weekend closures was considered as an option for the tunnel repair. However, upon further engineering studies, MTA NYCT eliminated this option from further consideration because it was technically infeasible and unreasonable and therefore fatally flawed. Given that only a very limited amount of work could be done under these limited closures, the Project would take many years (up to a decade or more) to construct under this option, repeated unplanned service disruptions during the morning rush hour would be highly likely, and the tunnel and structures within would continue to be used for an extended amount of time, well beyond the end of its expected useful life. For information on traffic conditions on side streets, including on 17th Street, please see Response to Comment 115, as well as Section 6.1.3.2 of the SEA.

Comment 27. Please reconsider letting taxis, Ubers and ambulances to use 14th Street and the people who have garages on 14th Street. I have to travel back and forth across the city several times a day in an Uber or taxi. How is this going to be possible with 14th Street closed? I can’t take the bus and carry two kids and two backpacks and fold a double stroller. We can’t drive across 23rd Street coming home because there’s no left turn onto Seventh Avenue. It’s going to cause gridlock on 15th Street. How am I going to access my car in our garage if the entrance on 14th Street is closed and 15th Street is complete gridlock? How is an ambulance going to get us to a hospital? (McCarthy)

Response: Based on community input, the current plan is that all local traffic, including for-hire vehicles making pick-ups or drop-offs, would have access to 14th Street but must turn off 14th Street at the next available right turn intersection after pick-up or drop-off is made. For-hire vehicles would be required to use avenues and other cross streets for through travel. Emergency service vehicles would have full access to 14th Street. See additional information on emergency service access starting at Response to Comment 173, as well as Section 5.2.3.2 of the SEA.

Comment 28. The MTA assessment is faulty, as it compares only two alternatives: No Action and the Proposed Action. There are numerous alternatives to closing 14th Street. (Adelson, Lieberman, Ryan, Ashenmil)

Response: Generally, for subway service disruptions, MTA NYCT provides one or more of the following, consistent with MTA Guidelines: additional service on adjacent and intersecting subway lines; substitute bus service; and/or increased service on existing bus routes. To the extent possible, the routes for substitute and increase of bus service typically follows the subway route that is disrupted or connects to nearby alternate subway route. The Proposed Action Alternative was developed consistent with those established guidelines.

Additionally, the purpose and need for the project is to provide transportation alternatives to the greatest number of diverted L train riders during the shutdown to the extent possible. The Proposed Action Alternative reflects a comprehensive approach,
consisting of multiple transportation modes, to achieve that purpose. The 14th Street busway is only one element of the comprehensive approach and MTA NYCT developed and evaluated design options for that element, as noted below.

MTA NYCT and NYCDOT developed and evaluated multiple options for the 14th Street Corridor. In addition to the 14th Street busway, scenarios considered for the 14th Street network included additional bus service with no street treatments, standard SBS, and a short busway (between Third Avenue and Sixth Avenue). Traffic modeling analyses of these options are presented in Appendix E of the SEA. As noted in Section 5.2.3.2 of the SEA, MTA NYCT and NYCDOT determined that these other options did not meet the goal of optimizing the effectiveness of the ASP.

Comment 29. With respect to the decision to close the tunnel entirely, as opposed to either (a) doing the work on one of the two subway tubes at a time, or (b) doing the work on weekends and at night, the MTA NYCT offers a thoughtful, though flawed, analysis in Appendix A. With respect to the ASP, the only option discussed is “no action.” A proper comprehensive study would have included discussion of the mitigation needs of the full closure plan, the night-and-weekend alternatives, and the one-tube-at-a-time alternative. (Schwartz)

Response: MTA NYCT awarded a contract in April 2017 for the reconstruction of the Canarsie Tunnel during a planned 15-month full-time double-track closure of the tunnel. As shown in Appendix A, alternatives to the full-time double-track closure of the tunnel were considered but were determined to be infeasible or unreasonable.

As shown in Appendix A, night and weekend closures and several single-track closure alternatives were analyzed alongside the full-time double-track closure. These alternatives were assessed with respect to how well they met the following four goals: maximize safety, minimize passenger disruption, minimize construction risk, and minimize operational impacts. As discussed in Appendix A, the night and weekend closure scenario was found to be fatally flawed and was eliminated from review. Further, the full-time single-track closure options would have required a robust alternative service plan of similar magnitude to the one proposed for the double-track closure, with increased subway service on parallel and intersecting lines and high frequency, high speed bus service between Bedford Avenue and Manhattan, and additional bus service along 14th Street. In addition, because of the increased time before work to the tunnel would be complete, there would be an increased risk that the duct banks and wiring in the tunnel would fail, causing the tunnel to be closed without a planned comprehensive transit mitigation strategy in place. As shown in Appendix A, alternatives to the full-time double-track closure of the tunnel were considered but were determined to be infeasible or unreasonable.

Comment 30. The “No Action” is not defined. (Schwartz)

Response: Section 4, “Analytical Framework,” of the SEA provides a detailed description of the No Action Alternative, including the various transit service improvements that would be implemented comparable to other major capital projects. As indicated in Section 4 of the SEA, the No Action Alternative includes the following: the approved Project (Core Capacity, State of Good Repair, and Canarsie Tunnel Restoration and Resiliency
projects), closure of the Canarsie Tunnel for a 15-month period, transit service improvements at a level routinely provided by MTA NYCT during major capital projects (details of which are shown in Table 1 of Section 4), and other planned, independent improvements to be implemented by MTA NYCT or NYCDOT.

**Comment 31.** We are concerned about the number of vehicles along the 14th Street corridor, about additional bus and bus priority in the corridor, and about connection points—from buses to subway, etc.; how will they be addressed? We are all in agreement that we can use space better and support vast bike share, CitiBike, across the 14th Street corridor as well. Let’s restrict private car usage and replace parking with human-centered design. (Transportation Alternatives)

**Response:** As described in Section 5.2.3.2, “14th Street Corridor Bus Enhancement,” of the SEA, the proposed ASP would provide access for buses, emergency vehicles, pedestrians, bicycles, and local access deliveries or drop-off/pick-up at all times. In the development of the ASP, based on public input, MTA NYCT and NYCDOT determined that to provide broader accessibility for local residents and businesses, all vehicles and cyclists with specific local destinations could use 14th Street without adversely affecting bus operations. Although there will be no dedicated bicycle lane on 14th Street, bicyclists can still access 14th Street.

**Comment 32.** A proper comprehensive study would have also discussed proposals made by the 14th Street Coalition and others to not shut 14th Street to cross-town vehicle and truck traffic entirely, and to modify the plan by restoring two lanes of traffic which the DOT plans to use for an expanded sidewalk. (Schwartz)

**Response:** Responses to Comments 41 to 53 address specific elements of the 14th Street Coalition’s recommendations. Response to Comments 42 and 138 address the effect of the ASP on cross-town truck traffic. As described in Section 5.2.3.2, “14th Street Corridor Bus Enhancement,” of the SEA, local deliveries would be allowed along the busway, so not all truck trips are eliminated from 14th Street.

**Comment 33.** There is no discussion of the impact of the two-track closure on Williamsburg, and other communities which have become thriving communities because of their access to Manhattan via the L train. If the project were done on nights and weekends, or one tube at a time, the need for the disruptive ASP would be avoided. (Schwartz)

**Response:** Socio-economic impacts were thoroughly considered, as discussed in Section 6.7, “Social Resources and Economic Impacts,” of the SEA. The ASP is designed to provide transportation alternatives to the greatest possible number of diverted L train riders, including those in Williamsburg. As stated in Section 6.7.2.3 of the SEA, “[c]ompared with the No Action, the proposed ASP would result in a beneficial impact with respect to neighborhoods, populations, and economic effects.” Further, “[t]he proposed temporary services are intended to minimize the effect of the L train service disruption during the 15-month closure of the Canarsie Tunnel on the populations and communities that rely on the L train for transportation … and would be supportive of existing land uses along the project corridor by providing alternative transit options to and within the affected neighborhoods.”
Comment 34. There is no discussion on how every other post-Hurricane Sandy tunnel repair was done on nights and weekends. (Schwartz)

Response: Not all under-river tunnels, impacted by Hurricane Sandy, received the same level of damage or have needed the same level of work to restore. While some tunnel repairs have been accomplished through nights and weekend closures, other tunnels have been closed full-time for extended periods due to the magnitude of the damage. As discussed in Appendix A, the R train’s Montague Tunnel “underwent a full shutdown for similar top-to-bottom repairs and reconstruction of the interior structure” for 13 months. The G train’s Greenpoint Tunnel was closed for 6 weeks for repairs, during which time a bus shuttle service was implemented.

Comment 35. If work were done one tunnel at a time, or on nights and weekends, the MTA NYCTA would use in-house labor, working pursuant to a collective bargaining agreement. Utilizing in-house labor costs less per foot than projects utilizing outside contractors. (Schwartz)

Response: Using in-house labor is not relevant; moreover, the options cited in the comment letter (one tunnel at a time or work on nights and weekends) are considered to be infeasible or unreasonable as noted in Appendix A of the SEA.

Comment 36. Appendix A clearly does not offer sufficient analysis and discussion about why the total shutdown option is better. And it certainly does not establish that the total shutdown option has the least environmental impact. (Schwartz)

Response: The rationale for selection of the double-track closure is presented in Section 6, “Selection of Construction Method,” of Appendix A. Potential environmental impacts are assessed throughout the SEA. As shown in Appendix A, alternatives to the full-time double-track closure of the tunnel were considered but were determined to be infeasible or unreasonable.

Comment 37. There is no backup data supplied to support the estimate that bus ridership on 14th Street will increase from some unstated current number to 84,000 people a day. (Schwartz)

Response: Backup data for the estimation of 84,000 bus riders per day on 14th Street is provided in Table 4, “Estimated 14th Street Bus Riders by Market,” in Section 5.2.1, “Estimated Demand for Proposed ASP Elements” of the SEA (with further detail in Appendix E of the SEA). Estimated bus ridership on 14th Street comprises 30,000 existing M14A and M14D bus riders, 28,500 intra-Manhattan L train riders diverted to the M14 SBS, and 25,500 Brooklyn-Manhattan L train riders diverted to the M14 SBS. See also Response to Comment 115, which describes the data and models used to develop ridership estimates, as well as Appendix E of the SEA.

Comment 38. Appendix E states, without any supporting data, that on every date 114,000 of the 250,000 L train riders have a final destination along 14th Street. This is a made up number. 14th Street is not a busy commercial strip. (Schwartz)

Response: To clarify, Appendix E should have stated that 114,000 out of 275,000 L train riders along 14th Street either begin or end their trip along the 14th Street corridor. The 14th Street corridor is one of the busiest commercial corridors in New York City, as measured by subway entries, trailing only 42nd Street and 34th Street among streets.
running east-west. Publicly-available MetroCard data\(^2\) show that on an average weekday in 2017, 227,897 people entered the five subway stations along 14th Street. This is about the same as at the seven stations between 47th Street and 53rd Street (243,629), or the six stations from 57th Street to 63rd Street (227,531). On weekends, 14th Street stations attract about as many riders as 34th Street stations. See Response to Comment 115 for further information on MTA NYCT’s modeling, as well as Appendix E of the SEA.

**Comment 39.** MTA NYCT is over-estimating the number of people who will use the interborough buses. MTA NYCT “estimates” that 17% of L Train riders will opt to take busses from Grand Street in Williamsburg, over the Williamsburg Bridge, and up Allen Street and then 1st Avenue to 14th Street, where they would board another bus, on 14th Street, to go across town to a subway. There is no explanation of why anyone would opt to do this. (Schwartz)

**Response:** MTA NYCT’s estimate that 17 percent of L train riders will utilize a bus between Brooklyn and Manhattan is based on the MTA NYCT demand model described in Appendix E of the SEA. Most of these riders are expected to transfer to subways in Manhattan to get to their final destinations. Virtually no riders are expected to ride the L1 and L4 buses to 14th Street and First Avenue and then transfer to a crosstown bus. Rather, most of these passengers are expected to transfer to subways at Delancey-Essex St, Spring St, Prince St, or Broadway-Lafayette St. The L1 and L4 routes will provide service to the 1 Av L station area, which is relatively far from alternative subway lines.

**Comment 40.** Between mid-August 2018 and January 2019, the MTA NYCT is shutting down the L train on weekends without providing SBS service on 14th Street and without a closure of 14th Street. There is no logic to this action, and no announced plan to use this shutdown to study exactly how commuters react. (Schwartz)

**Response:** The work taking place now is not part of the Proposed Action. The weekend closures occurring prior to the tunnel shutdown do not require providing SBS service or a busway on 14th Street. During these weekend closures, a variety of service alternatives is provided within Manhattan and Brooklyn. While the L train has very robust weekend ridership, there is a fundamental difference in scale between peak weekday ridership and weekend ridership. During the busiest hour of a typical weekday morning, approximately 24,000 people ride the L train through the tunnel into Manhattan. The highest weekend hourly ridership is approximately 7,000 in one direction. On 14th Street, it is projected that peak weekday bus demand will be about 75 percent greater than peak weekend hour demand. As such, the need for a significant mitigation plan across 14th Street is much greater on weekdays, although during the tunnel closure a similar operational plan is also needed on weekends to ensure a robust ASP at all times, and for consistency in customer information.

Moreover, weekend-only L train closures in the fall of 2018 are different in nature than the 15-month full-time two-track L tunnel closure beginning in April 2019 for several reasons. First, on these weekends in fall of 2018, L train service will not operate between Bedford Avenue and either Myrtle-Wyckoff Avenues or Broadway Junction, different from the 15-month closure which will have L service at all L stations throughout Brooklyn. The closure of these additional segments of the L train in

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\(^2\) [http://web.mta.info/nyct/facts/ridership/ridership_sub.htm](http://web.mta.info/nyct/facts/ridership/ridership_sub.htm)
Brooklyn cut off key subway alternatives that will be available for the 15-month closure, and replacing the L train service along these segments in Brooklyn requires a large number of buses. Further, the full transit mitigation strategy of additional service on alternate subway lines and for the planned interborough bus services cannot be made for only a weekend, as train equipment, buses and other resources cannot be easily put in place with such a short lead time and then restored to normal weekday locations. Additionally, there will not yet be a temporary ferry service between Williamsburg and Stuyvesant Cove in Manhattan, which will provide an important connection to the M14 SBS during the 15-month closure. With the L train operating only along a small portion of its route, and without the additional service on alternate subway lines, interborough buses, and ferry, there is extremely limited value in using these weekend closures as a basis for a study in what travel options people would choose to utilize for the April 2019 full-time two-track closure.

Comment 41. The ASP portion of the MTA’s SEA, pertaining to 14th Street, is riddled with unnecessary issues that can negatively impact commuters, local businesses and residential community alike. We urge MTA/DOT to modify the ‘Draft Design’ for ‘Temporary M14SBS Street and Sidewalk Treatments’ to best assure that the plans optimally meet the potential needs of displaced commuters as well as the inherent needs of local business and residential communities. The currently drafted streetscape configuration is conflicted in its ability to address both. We otherwise urge FTA to remediate the ASP to redirect the MTA & DOT to modify the plans to more effectively achieve the desired outcomes. (14th Street Coalition)

Response: The ASP was developed to provide transportation alternatives to the greatest number of diverted L train riders during the shutdown to the extent possible balanced with the needs of local businesses and residents. Access to all businesses and residential buildings will be maintained at all times. Based on public feedback, the design of 14th Street has been revised to accommodate increased short-term drop-off and loading space along each block, in most cases in a “floating” configuration, adjacent to contiguous pedestrian space. In addition, MTA NYCT, in coordination with NYCDOT, would monitor traffic conditions in a dynamic and responsive manner potentially making adjustments.

Comment 42. Keep truck access open across the 14th Street corridor. 14th Street is the only bi-directional crosstown ‘Local Truck Route’ within 1¼ mile of prominent neighborhoods between Houston and 23rd Streets. Denying 14th Street truck access would choke narrow streets throughout the corridor. A 14th Street busway must NOT exclude DOT’s 14th Street “Local Truck Route.” (14th Street Coalition)

Response: As described in Section 5.2.3.2, “14th Street Corridor Bus Enhancement,” of the SEA, under the ASP, local deliveries would be allowed along the busway, so not all truck trips are eliminated from 14th Street. Through trucks using 14th Street as a designated truck route would be diverted. As noted in Section 8 of the SEA, MTA NYCT, in coordination with NYCDOT, are coordinating with NYPD on truck enforcement along the corridor.
Comment 43. Allow delivery and vehicle access to 14th Street residents and businesses. The majority of 14th Street residential and business properties only have 14th Street lobby and service entries. Elderly and disabled cannot travel independently. Businesses require deliveries and customers. Sanitation trucks need daily curb access throughout the corridor. Moving vans and contractors must have access to service entrances. Food and package deliveries are daily events. Ambulances, fire trucks and other emergency vehicles must be given right-of-way. Public garages within the corridor require accessibility. (14th Street Coalition, Holtzer, Williams)

Response: As described in Section 5.2.3.2, “14th Street Corridor Bus Enhancement,” of the SEA, local access and local deliveries would be allowed on 14th Street. Vehicles would have to turn off of 14th Street at the next available right-turn intersection, so private vehicles would not be allowed to drive across the entire street. MTA NYCT and NYCDOT are working with the Department of Sanitation and local business improvement districts (BIDs) to coordinate garbage collection. There would be dedicated loading zones throughout the 14th Street corridor to allow for local deliveries at all times of day. As noted in Section 5.2.3.2 of the SEA, implementation of the temporary busway along 14th Street would “restrict through traffic to buses, and emergency vehicles.” As shown in Figures D-4 through D-11 (Appendix D) of the SEA, the busway would provide a combination of two vehicular lanes plus a curb-side loading area and three vehicular lanes in areas adjacent to SBS stops to allow for buses to bypass one another and emergency service vehicles to bypass buses. This combination of vehicular lanes, loading areas, and expanded pedestrian zones along with a net reduction in overall traffic volume along 14th Street (through prohibitions on other traffic) would provide sufficient room for all modes of travel within the corridor. Emergency service vehicles would also run counter-flow (i.e., within the on-coming lane) if necessary to bypass congested conditions.

Comment 44. Do not allow for two lane constriction through the center of each block. Each constriction is a potential bottleneck and unnecessary failure mode. (14th Street Coalition, Ingall, P. Kahn)

Response: As shown in Figures D-4 through D-11 (Appendix D) of the SEA, the busway would provide a combination of two vehicular lanes plus a curb-side loading area and three vehicular lanes in areas adjacent to SBS stops to allow for buses to bypass one another and emergency service vehicles to bypass buses. This combination of vehicular lanes, loading areas, and expanded pedestrian zones along with a net reduction in overall traffic volume along 14th Street (through prohibitions on other traffic) would provide sufficient room for all modes of travel within the corridor.

Comment 45. Do not give up the street to create unnecessary expansive 68-foot-wide pedestrian malls, which then force SBS buses, together with delivery and emergency vehicles, to comingle through single lane bottlenecks. 14th Street already has ample 24-foot-wide sidewalks on both sides. Displacing pedestrians onto the street, separate from buses by rubber stakes, is dangerous and unnecessary. (14th Street Coalition)

Response: See Response to Comment 44, as well as Appendix D of the SEA. In addition, pedestrian traffic along 14th Street is anticipated to increase under the proposed ASP. (See information on pedestrian volumes presented on the Canarsie Tunnel Project website under “Travel Options”3). Wider sidewalks in key locations would help to ease any congested conditions.

3 http://web.mta.info/sandy/pdf/L%20Tunnel%20Reconstruction_072018.pdf
sidewalk congestion and improve pedestrian safety. There will be increased pedestrian traffic as people who would normally take the L train will walk across 14th Street. For example, many riders are expected to divert to the M train, and someone who works at Union Square would have the option of taking the bus two blocks or walking.

Comment 46. Reclaim rather than extend sidewalks. Sidewalks are most congested along Union Square, where a handful of vendors consistently occupy more than the 10 feet sought for expansions. ‘Keep our street’ to ensure the busway is dynamic, flexible and flows freely. (14th Street Coalition)

Response: MTA NYCT and NYCDOT developed projections of pedestrian volume increases along the 14th Street corridor. For example, pedestrian volume at the intersection of 14th Street and Sixth Avenue is expected to increase by 139 percent, which would lead to pedestrian volumes at peak times similar to those at Herald Square. (See information on pedestrian volumes presented on the Canarsie Tunnel Project web-site under “Travel Options”⁴). Those projected increases are sizeable enough, and sizeable in places where vendors are not currently present, such that NYCDOT has concluded that the proposed temporary pedestrian space would best accommodate these increases. In addition, as described in the Response to Comment 45, pedestrian traffic along 14th Street is anticipated to increase under the proposed ASP. Wider sidewalks in key locations would help to ease any sidewalk congestion and improve pedestrian safety.

Comment 47. Provide businesses and residents adjacent space for access and deliveries. DOT has positioned delivery spaces adjacent to the single lane constructions. Spaces are needed on both side of 14th Street for truck deliveries and resident access. Crossing the busway with hand trucks is not acceptable. Ample space should be provided to prevent double parking or delays resulting from pulling in/out of spaces. (14th Street Coalition)

Response: As shown in Figures D-4 through D-11 (Appendix D) of the SEA, the busway design would provide curbside loading areas along both sides of 14th Street. Immediately adjacent loading space would not be available for all businesses and residents, but crossing 14th Street with deliveries would not be necessary.

Comment 48. Direct and enforce new traffic patterns. (14th Street Coalition)

Response: This recommendation is consistent with the anticipated management of the ASP. MTA NYCT, together with NYCDOT, are working with NYPD to ensure that there will be proactive enforcement along the corridor. Additionally, there would be traffic cameras on 14th Street in order to enforce the busway restrictions.

Comment 49. Install temporary digital signage in advance of 14th Street to advise of changed traffic patterns. (14th Street Coalition)

Response: Signage would be installed to advise drivers of roadway restrictions. The signage installed by NYCDOT would be in place in advance of any restrictions and be complemented by a public outreach and messaging campaign.

⁴ [http://web.mta.info/sandy/pdf/L%20Tunnel%20Reconstruction_072018.pdf](http://web.mta.info/sandy/pdf/L%20Tunnel%20Reconstruction_072018.pdf)
Comment 50. Do not allow left turns onto the bus right-of-way and require right turns onto busway from right lane only. (14th Street Coalition)

Response: MTA NYCT will coordinate with NYCDOT and will take this comment into account in the continued development of the operations plan for the 14th Street busway. MTA NYCT would monitor traffic conditions in a dynamic and responsive manner potentially making adjustments.

Comment 51. Regulate influx of for-hire vehicles (FHVs) and control where FHVs pick-up/discharge near 14th Street. Consider FHV pickups in left turn lanes of intersecting avenues. (14th Street Coalition)

Response: FHVs would be subject to the same rules as any passenger vehicle with respect to access to 14th Street. FHVs making a pick-up or drop-off along 14th Street would have to make the next right-hand turn off of 14th Street. As noted in footnote 10 in Section 6.1.3.1 of the SEA, the largest potential increase in FHVs would be in the No Action condition when there would not likely be sufficient 14th Street bus capacity and worsening travel times would push customers to other modes. NYCDOT will explore dedicated pick-up points for these vehicles in the development of its detailed operations plan for the 14th Street busway.

Comment 52. Consider using existing sidewalk bus stop for local buses to enable SBS buses to pass stopped local buses and delivery vehicles to pass in a separate lane. (14th Street Coalition)

Response: The busway would provide three vehicular lanes in areas adjacent to SBS stops to allow for buses to bypass one another and emergency service vehicles to bypass buses. Since pedestrian traffic along 14th Street is anticipated to increase under the proposed ASP, wider sidewalks in key locations (instead of maintaining existing sidewalk bus stops for local buses) would help to ease any sidewalk congestion and improve pedestrian safety. This combination of vehicular lanes, loading areas, and expanded pedestrian zones along with a net reduction in overall traffic volume along 14th Street (through prohibitions on other traffic) would provide sufficient room for all modes of travel within the corridor.

Comment 53. Maintain four vehicular lanes (not two or three) on 14th Street to enable flexibility to make expedient changes throughout the day (i.e., with cones/signs), SBS buses to easily flow past local buses and other vehicles in a separate lane, maximum access for emergency vehicles, ability to perform early test runs without eliminating lanes, access for local residents, curbside space available as needed for: deliveries on both sides, SBS bus bulbs (consider 7-foot to 8-foot versus 10-foot width to yield wider vehicle lanes), expanded cross-walk spaces for safety, and local bus stops to ease SBS passing (using existing on-sidewalk bus shelters). (14th Street Coalition, Llewellyn, Edwards, Howard)

Response: MTA NYCT and NYCDOT evaluated standard SBS treatments (dedicated bus lane with travel lane) and found this configuration would not address corridor needs as effectively as the proposed busway design. As shown in Figures D-4 through D-11 (Appendix D) of the SEA, the busway would provide a combination of two vehicular lanes plus a curb-side loading area and three vehicular lanes in areas adjacent to SBS stops to allow for buses to bypass one another. This combination of vehicular lanes,
loading areas, and expanded pedestrian zones along with a net reduction in overall traffic volume along 14th Street (through prohibitions on through traffic) would best accommodate buses, emergency vehicles, and local access, while also ensuring pedestrian safety and throughput. Compared to the No Action Alternative, which would add additional buses to 14th Street but not make any provisions for traffic flow, the proposed ASP would result in improved traffic flow throughout the 14th Street corridor. See above for responses to other suggestions.
SUBWAY TRANSIT

Comment 54. Please run the L train on the Manhattan side as a shuttle between 1 Av while the tunnel is being repaired. Why won’t the L train run shuttle in Manhattan between 1 Av and 8 Av? (Bandman, Clapp, Marenson, Norris)

Response: It would not be possible to operate an L shuttle train solely within Manhattan. The track segment in Manhattan does not have any connection with the rest of the subway network, so trains would not be able to access yards for regular inspection and maintenance. A train that breaks down would stay there until the tunnel is reopened, which would interrupt service along this segment for the duration.

Comment 55. The MTA should keep in mind that people have been complaining about G train service in the past and the MTA should do something to resolve this issue. During the L train shutdown, I would like the MTA to extend the G train to Forest Hills 71st Avenue during weekends and overnights. (Penafort)

Response: The Queens Boulevard line does not have capacity to accommodate G train service during the ASP. Any extension in G train service would necessitate a reduction in M and R train service, reducing rail capacity between Court Sq and Manhattan, to the detriment of the ASP. Permanent changes to G train service are beyond the scope of the ASP for the Canarsie Tunnel Project.

Comment 56. Increased train service should begin immediately on the lines that are expected to absorb L train passengers during the shutdown. The G train is a prime example. Adding more cars to the G train and running it more frequently now would encourage riders to make the switch to the G train ahead of time and cut down on headaches come next April. (Lentol)

Response: As noted in Table 1 of Section 4, “Analytical Framework,” of the SEA, G train frequency and train length would be increased in both the No Action Alternative and the proposed ASP. MTA NYCT has not identified enhanced G train service for an early start due to lack of demand and limited resources.

Comment 57. In addition to the free out-of-station MetroCard transfers already planned, please add one between the G-train at Fulton Street and the subway lines at Atlantic Avenue. (Ferko, Greene, Bagrova, White, Mann-Hielscher, Thomson, Merigo, Dolan, Bustoin, McGregor, Szykitka)

Response: While there would be some benefit to customers who could take advantage of this transfer, the percentage of customers currently using the L train tunnel who would utilize such a transfer is relatively small (less than 1 percent of L train riders). Customers wishing to transfer to the lines serving Atlantic Av-Barclays Ctr may do so by using the J train and transferring at Canal St, Chambers St, or Fulton St in Lower Manhattan.
Comment 58. The G train is proposed to get more service going to and from Church Avenue. With more G trains going to and from Church Avenue during peak periods, this is going to create more congestion along the local tracks between Bergen Street and Church Avenue with the F train sharing the local tracks alongside with the added G trains, this is going to create delays and service disruptions for F train riders in Brooklyn especially with the terminal congestion at Church Avenue. This will even cause more delays and service disruptions for F train riders. To reduce the delays and service disruptions for Brooklyn F train riders, have some but not all F trains run express between Jay Street and Church Avenue during peak periods with express trains running every 15 to 20 minutes (like three trains per hour, or TPH). Some of these express trains could be renamed (like the K train or the V train) to avoid confusion. (Follo)

Response: Track capacity is adequate on the local track shared by the G and F trains to accommodate the proposed enhanced G train service. Limiting G trains to 6 tph terminating at Church Av with another 6 tph terminating at 18 Av (under both the No Action Alternative and the proposed ASP) will help manage terminal congestion.

Comment 59. There is no evidence that people will continue to travel across 14th Street as if they were on the L train. Most likely, people heading toward uptown areas around Eighth Avenue will take a subway from Brooklyn that lets them off on the 8th Avenue subway line or a bus starting at a lower subway or bus connection. The same for Seventh Avenue and Sixth Avenue. RPA issued a report using U.S. Census Bureau’s Longitudinal Employment and Housing Dynamics (LEHD) data to suggest only 3 percent of residents near selected Brooklyn L stations have a job in the 14th Street corridor. The approximately 9,081 daily PATH riders who exit at 14th Street can more easily reach east side locations by transferring to an F or M train at 23rd Street and then connecting to the 7 train at 42nd Street. (Goldford, Boddington)

Response: Appendix E of the SEA summarizes the different components of projected busway users. It is correct that only a small portion (54,000 out of 275,000, or 20 percent) of all L train riders along 14th Street are expected to divert to a bus on 14th Street. (This is composed of 25,500, or 11 percent of Brooklyn to Manhattan L train riders, and 28,500, or 57 percent of intra-Manhattan L train riders). As the commenters noted, L train riders traveling between Brooklyn and Manhattan will indeed have several different options for making their trips via subway during the approximate 15-month shutdown. Of the Brooklyn to Manhattan riders expected to use the busway, most would either be ferry riders who transfer to the M14 SBS or Brooklyn riders travelling to 14th Street by subway and transferring to a bus to First Avenue. In addition, it is expected that the current 30,000 riders on the M14A and M14D would continue to use the service. Together, these components would total an estimated 84,000 riders per day on the busway. This would make 14th Street by far the busiest bus corridor in New York City.

The LEHD data cited by the RPA is not the best metric for analysis of the riders through the L train tunnel. The relevant question is where people who travel through the tunnel go. This can be directly derived from MetroCard data which shows a higher portion of riders through the Canarsie tube are in fact destined for the 14th Street corridor—about 28 percent in the AM peak hour—than is shown in the LEHD data. This apparent discrepancy between LEHD and MetroCard data is not surprising for a number of reasons. The LEHD data includes people who work in Brooklyn, Queens, and Long Island, and thus do not even cross the East River. It includes people who do not use
transit to commute. Many midtown and downtown destinations are better served via the A, G, J or M trains, and are thus not current L train tunnel riders. On the other hand, the LEHD does not include non-work trips, while the 14th Street corridor is a major destination for non-work trips. It also does not account for passengers from other areas who are going to 14th Street and transfer to the L train at Broadway Junction, Myrtle-Wyckoff Avs or Metropolitan Av-Lorimer St. All of these factors lead to a much higher concentration of 14th Street destinations among L train tunnel riders.

The small number of PATH riders who transfer to the L train only to transfer again at 14 St-Union Sq to another subway are not expected to account for any of the 84,000 projected busway riders. The area around the 1 Av station is indeed a major destination for travelers both from Brooklyn and Manhattan. Transfers to and from the M15 or M15 SBS account for less than 1 percent of all L train riders along 14th Street.

Comment 60. Why aren't M trains running 24/7 during L shutdowns on the East River? You expect us to take the F to the J to the M to a shuttle at Myrtle Wycoff Avs? Further, M trains are stopping early on Friday just as L trains stop. (Murphy, Badillo)

Response: As part of the No Action Alternative and proposed ASP, the M train will be extended into Manhattan 24/7 (see Table 1 of Section 4, “Analytical Framework,” of the SEA). It will continue to run to Forest Hills-71 Av during the weekday daytime and evening hours that it currently runs to there. At all other times, it will run from Middle Village-Metropolitan Av, across the Williamsburg Bridge, on the Sixth Avenue local, and then on the Second Avenue line to 96 St.

Comment 61. Make the Metropolitan Avenue M train the express, instead of the J train in the afternoons. An express M train from Myrtle-Wyckoff Avs to Myrtle Broadway (every other train), would help alleviate some of the pressure. (Moss)

Response: Under the No Action Alternative and proposed ASP, the M train and the J train will both operate with all local service between Marcy Av and Myrtle Av Broadway during the shutdown (see Table 1 of Section 4, “Analytical Framework,” of the SEA). This is because a large amount of the L train market along the segment is expected to divert south to the J/M train stations along this shared segment, so both services are needed to meet increased demand and ensure that stations do not get overcrowded. An express from Myrtle-Wyckoff Avs to Myrtle Av Broadway is not feasible, as that line segment only has two tracks.

Comment 62. The MTA NYCT should provide additional service and lengthened trains on the G train. This train should be extended to Queens Plaza where it ran for many years to make connections to the trains that run there. There should be 24/7 service on the G. Free out-of-system MetroCard transfers should be provided between Livonia Av and Junius St. The MTA NYCT should reopen station entrances at Flushing Avenue at Fayette Street (completed July 2017), Metropolitan Avenue at Powers Street, Hewes Street, and those with ramps or elevators on the J/M/Z trains at Broadway Junction (Eastern Parkway), Chauncey Street, Halsey Street, Gates Avenue, and Kosciuszko Street. (Glasgow, Maras, Badillo)

Response: The G train currently has 24/7 service. As noted in Table 1 of Section 4, “Analytical Framework,” of the SEA, additional service and lengthened trains will be provided on
the G train under both the No Action Alternative and the proposed ASP. The Queens Boulevard line does not have sufficient capacity to allow extension of G train service to Queens Plaza without reducing service on the M and R trains to the detriment of the ASP (particularly needed capacity between Court Sq and midtown). Temporary free MetroCard transfers are being proposed at Livonia Av and Junius St. The suggested Hewes St entrance and Powers St entrance are being reopened as part of the proposed ASP. Permanent station improvements beyond the additional turnstile capacity and reopened entrances identified in Table 1 of Section 4, “Analytical Framework,” of the SEA are beyond the scope of the ASP for the Canarsie Tunnel Project.

Comment 63. It is unconscionable that we are spending almost $1 billion on this project, and shutting down the L train, with no plans to renovate the L train tracks, signals, stations or improve accessibility along this important corridor. (Groncki)

Response: MTA NYCT has already made investments into infrastructure serving the L train. Communications-based train control (CBTC), which is an upgraded signal system, has already been installed on the L train. Routine state of good repair work is being performed now on the Bedford Av to Canarsie Rockaway Pkwy section of the L train prior to the start of the approximate 15-month shutdown to ensure its reliability during the closure. Other Hurricane Sandy repair work, including replacement of damaged duct banks, track, circuit breaker houses, signals, communication, and power cables, tunnel lighting, and a pump room, is being completed as part of the approved Canarsie Tunnel Project. As part of the Core Capacity portion of the project, MTA NYCT is adding three new substations and low resistance contact rail to the L train to increase power capacity, enabling an increase in frequency (20 tph to 22 tph), and improving reliability. MTA NYCT is also making substantial improvements to the Bedford Av and 1 Av stations to improve passenger circulation and provide Americans with Disabilities Act (ADA) access.

Comment 64. Recently you have spoken a lot about the bus service that will be provided during the reconstruction of the Canarsie Tunnel. What are you going to do to provide additional subway service, particularly on the J train? A good number of customers will be transferring at Broadway Junction for the A, C, and J and you don't seem to be addressing that issue. You seem to be more concerned about the buses from Williamsburg than the subway service from Brooklyn, particularly Broadway Junction. Now that you seem to have a handle on the bus service from Williamsburg, what about the need for increased Subway service for the rest of Brooklyn. I would like to hear your specific plans on increased Subway service during the L train shutdown. (Bettman)

Response: See Table 1 of Section 4, “Analytical Framework,” of the SEA, which lists a number of different subway enhancements that will be undertaken with or without the proposed ASP. Peak service across the Williamsburg Bridge will increase from 21 tph to 24 tph, primarily through increases to M train service. J/Z trains will make all stops between Marcy Av and Broadway Junction to accommodate additional demand at stations along that segment. J train service will be increased in off-peak hours, and C trains will be lengthened. Stair improvements at Broadway Junction will improve the flow of transferring passengers between the J train and the L train, and is a previously planned project of independent utility, as noted in Appendix B of the SEA.
**Comment 65.** MTA NYCT needs to provide more transfer options in Bushwick where underground passageways to the other side of the platform do not exist. (Bagrova)

**Response:** Additional transfer options in Bushwick are beyond the scope of the ASP for the Canarsie Tunnel Project. There are many stations throughout the NYCT subway network where passengers cannot access trains in both directions from all station entrances. New passageways in Bushwick would not be beneficial for L riders needing alternative service between Brooklyn and Manhattan. Customers may access trains in an opposite direction by using alternate station entrances, which can generally be accessed by crossing a street.

**Comment 66.** The L train shutdown will not only impact direct L train riders, but also people who ride the nearby lines. Many people who ride the L will use alternatives, the big ones being the E, G, J, M, Z, and 7 trains. The 7 is an important route in Queens, and unfortunately, not much can be done to reduce crowding. The reason why the E is so crowded is because it is the Queens Boulevard express line going via 53rd St, a very popular area for transfers. Many people will use this line at Court Square, pretty much the peak load point in the AM rush and chances are the line will experience extreme crowding inside the train, and potentially on the platform (although the M is there to help out, which is much less crowded coming from Queens). One solution would be to time the G to drop off people so that right when the M pulls up, it can take all the people, this would be very difficult to time consistently. The other option would be to have both locals go via 63rd and the expresses go 53rd to help spread crowding out, or vice versa, just so that one express train isn’t extremely overcrowded constantly. This should be studied along the Queens Boulevard corridor potentially. Also, on a more minor note, the stations at Court Square, Myrtle-Wyckoff Avs, and a few other stations that will be key transfers and alternatives may experience crowding that could lead to problems, so a study should also be done on this too. (Prieve)

**Response:** Increased G train and M train service are components of the proposed ASP and the No Action Alternative. It is not possible to time G train and M train arrivals as they need to be scheduled around other subway lines with which they share track and they run at different frequencies. The longer transfer distance at Court Sq attenuates crowds between the two platforms. At Myrtle-Wyckoff Avs, MTA NYCT anticipates passenger transfer flows may lead to minor queuing as passengers exit the L train platform. However, the M train platform only has one stair off of the platform so customers will likely experience queuing in the PM rush hour from the M train to the L train. Sending the F train through 53 St would result in less overall capacity for displaced riders at Court Sq because the F train is more crowded than the M train.

**Comment 67.** The rush hour F train is already a known disaster to anyone forced to regularly rely on it for their commute. Overloading it at Delancey St/Essex St will only exacerbate this issue. (Beach)

**Response:** The proposed ASP and No Action Alternative includes temporary increases to peak hour M train service operating between the Delancey St/Essex St station and Sixth Avenue, which parallels F train service within Manhattan. The F train currently operates within guidelines, and while loading will increase, it is expected to remain within guidelines with the ASP. The ASP reduces loading on the F train compared with the No Action Alternative. Customers on the interborough buses would also be
encouraged to stay on the bus in order to transfer to less crowded subway lines at Spring St (6), Prince St (R/W), and Broadway-Lafayette St (B/D/F/M).

Comment 68. We are concerned that MTA and NYCT are underestimating projected ridership on subways and should reconsider estimates for ridership along the L train in Manhattan along 14th Street. MTA should reconsider the amount of transfers that will take place (based on Appendix E). There are concerns about the validity of the assessment and analyses. There is concern that the subway station platforms along adjacent subway lines will be too overcrowded. We believe that the plan should focus more on increased ridership. (Boddington, Glick, Goodwin)

Response: One of the main goals of the ASP is to reduce subway train and station crowding to manageable levels by providing added ferry and bus services and bicycle and pedestrian infrastructure. Ridership projections are likely conservative in that there is no accounting for shifts to non-transit modes, shifts in time of day of travel, or reduction in total trips.

Comment 69. We are happy that the Sixth Avenue station will be made ADA accessible, MTA should continue to make stations ADA compliant. There is a need for ADA elevators in Brooklyn as well. In Brooklyn, Grand St stations do not have elevators. For ADA compliant station upgrades there should be an extension of the traffic island on 14th Street and Avenue A. Overall, we are concerned about bus and subway ADA improvements. (Greif, Maloney, Reynolds)

Response: While required portions of the ASP would be ADA-compliant, other ADA accessibility projects are beyond the scope of the ASP for the Canarsie Tunnel Project. Please note that part of the existing Canarsie Tunnel Core Capacity Project entails installation work that will make two stations ADA accessible with installation of elevators.

Comment 70. We question the MTA’s need for L interborough bus service to access the constrained 6 train Spring St station compared with the much larger Broadway-Lafayette St. (Davies, Lawrence, Tenenbaum)

Response: Interborough buses would serve both stations. The Lexington Avenue line (specifically the 6 train) has ample capacity at Spring St as L train riders would board northbound trains travelling in the reverse peak direction. It is a shorter and more direct linkage with riders on the L interborough buses. In addition to the Spring St 6 train, the bus serves the Prince St R/W train on the Broadway line and the Broadway-Lafayette St/ Bleecker St B/D/F/M/6 trains. About 36 percent of current L train riders are destined for destinations on the Lexington Avenue line (such as Wall St, 14 St-Union Sq, and Grand Central) or the Broadway line. MTA NYCT does not anticipate crowding conditions at Spring St.

Comment 71. The MTA outlines the increase in subway service by adding capacity at Nassau Avenue and Metropolitan Avenue G train and the reopening of the Hope Street station entrance at Metropolitan Avenue. I would strongly encourage MTA New York City Transit to look to expanding extra cars for other subway lines such as the A, C, J, M, Z and the 2, 3, 4, and 5 trains. (Adams)

Response: The No Action Alternative and the ASP include additional cars on the C train and increased service on the A, E, F, G, J (off-peak), M, and 7 trains. Besides the C train,
the other subway lines mentioned in the comment run full length trains that are as long as allowed by platform lengths along the routes.

Comment 72. In 2016 I called for the MTA New York City Transit to establish a free transfer connection between the Junius 3 train and the Livonia Avenue L train. Funding for this connection is included in the MTA's 2015-2019 Capital Plan, but the free transfer can happen immediately if the MTA implements an out-of-station transfer like we see on at the Lexington Avenue/59th Street station on the Upper East Side. The MTA has indicated that 50 percent of commuters at Junius/Livonia station use Unlimited MetroCards, which may very well be true. That also means 50 percent of residents at a station in one of the poorest census tracts in the United States have to pay a double fare in order to transfer at this location. It is imperative that this capital project be fast-tracked and in the interim residents be provided with a free out-of-station transfer as the commuting capacity will be shifting towards these lines and will be seeing an influx of additional riders. (Adams)

Response: As shown in Table 1 of Section 4, “Analytical Framework,” of the SEA, free MetroCard transfers between the Junius St 3 train station and Livonia Av L train station are proposed as part of the No Action Alternative and proposed ASP. This element will not be implemented prior to the start of the ASP because direct L train subway service to Manhattan will still be available from Canarsie, Brownsville, and East New York.

Comment 73. Table ES-1 indicates that the MTA's own modeling predicts a 20 percent reduction in demand on adjacent subway lines between Brooklyn and Manhattan. The MTA NYCT significantly underestimates the number of potential riders displaced from the L train to neighboring subway lines. While Table ES-1 of the SEA predicts a 20 percent reduction, an increase in ridership should be assumed as subway service becomes more reliable. While I understand that the improvements to the G train and, hopefully, completion of Communication Based Train Control (CBTC) on the 7 train will improve service for some riders, it seems that many on the 2, 3, 4, 5, N, Q, W, F, J, M, and Z will experience some increase in typical service and not a 20 percent reduction. I am pleased to see that those improvements to the G and M trains will include permanent facets such as more turnstiles and re-opening previously closed exits, however I feel the MTA should approach this mitigation plan with the assumption that the subways will continue to see increased ridership into the future. (Glick)

Response: The 20 percent reduction estimated in the SEA is the change in demand on adjacent subway lines relative to the No Action Alternative, which assumes the tunnel closure but does not include interborough bus service, enhanced 14th Street bus service, car and truck operational restrictions, or temporary ferry service. The No Action Alternative will result in considerable overcrowding on subways. The ASP’s provision of additional bus service, transit priority and ferry service are key elements of the plan, which aims to keep subway demand within capacity on alternate lines wherever feasible. The ASP demand reduction provides an opportunity to lessen the effects and improve operating conditions on other lines during the temporary tunnel closure. Because the ASP provides additional overall transit capacity as compared to the No Action Alternative, it would be better able to accommodate potential increases in transit ridership during the duration of the project. Another outcome of successful completion of the L train tunnel project will be the addition of three new power substations and low resistance contact rail, which will allow an increase from 20 to 22
L trains during the peak hour in the peak direction, which is needed to accommodate both existing and projected future demand on the L train.

**Comment 74.** Finally, a thank you for the Avenue A entrance to the 1 Av L stop. This will make the station more accessible by reducing the rush hour congestion that forms on the First Avenue end of the platforms. (But the architect’s rendering of the above ground view shows all entrances marked “Brooklyn Only.”) (Huebsch)

**Response:** Comment noted.
SUMMARY OF COMMENTS AND RESPONSES

BUS TRANSIT

Comment 75. The proposed routing of the interborough buses on Manhattan streets ignores existing congested conditions and inadequate turn radii. The MTA NYCT should have included evaluation of the 14th Street Coalition alternative plan in the SEA. (Pesin, Bond)

Response: See Response to Comments 41 to 53. Bus priority measures have been proposed to address existing traffic volumes. Proposed bus routes have been evaluated to ensure adequate turn radii and clearances for the buses.

Comment 76. The busway impedes bus and residential activity. Will there be more than two lanes for buses in each direction to pass each other? If not, delays will be worse, not better. (Pesin, Riley, Wortman)

Response: The figures in Appendix D of the SEA show the proposed layout for the busway (Figures D-5 to D-11). They show that there would effectively be three travel lanes almost the entire length of the busway. The third lane would shift between the eastbound and westbound directions in the vicinity of bus stops, providing opportunities for passing and allowing for free-flowing traffic.

Comment 77. Commenters expressed concerns about increased traffic and air quality from additional interborough buses especially in the neighborhoods south of Houston Street. MTA NYCT should look at alternative routes proposed by the Kenmare Little Italy Loop Coalition because there is already so much traffic. There is a need for open pathways for emergency service vehicles which appears to be overlooked on the proposed route. (Glick, Grubler, Pervin, Standish, Tenenbaum, O)

Response: With the HOV3+ policy that would be implemented on the Williamsburg Bridge under the ASP, vehicular traffic across Delancey Street and Kenmare Street is expected to be less than the No Action Alternative. Bus routes that connect to the closest subway stations in Manhattan would provide the quickest travel times for customers who can continue their trip by subway. While the majority of L2 and L3 bus routes customers would use the Delancey St/Essex St F/M/J/Z station, a significant number of customers would want to access the 6 train at Spring St (the most proximate 6 train station to the Williamsburg Bridge), or the R/W train at Prince St, and an important ADA-accessible transfer at the Broadway-Lafayette St/Bleecker St B/D/F/M/6 station complex. MTA NYCT wants to encourage riders to stay on the bus to access subway lines with more capacity (e.g., the 6, R/W and B/D trains). Alternative stations were also considered, such as the B/D Grand St station but buses to Grand St would not offer as time-competitive a trip. Minimizing the number of bus turning movements is critical to reducing pedestrian and vehicular conflicts. The L2 and L3 routes would entail four turns (three right turns and one left turn), whereas the alternative route to Astor Place would require a total of eight turns (five right turns and three left turns). Left turns are less desirable for bus operations because some angles and sight lines are obscured and should be avoided in heavy pedestrian and vehicular conditions where possible. A routing that travels via Allen Street and westbound on Houston Street was also considered, but the street network west, north, or south of the Broadway-Lafayette St station provides no good options for buses to turn around. The route length would also be increased which would not be an efficient use of bus resources, and would, therefore, lead to an overall reduction in bus capacity given constraints on the bus fleet.
Comment 78. The bus route on Kenmare Street turning onto Cleveland Place will be a hazard towards pedestrians and a hardship to businesses on many levels. The turn should not be on Cleveland Place where the streets are narrow—it should go from Delancey Street and turn on Allen Street where the streets are wider and can handle the bus route. This alternative route is safer and only seven blocks away. (H. Maloney, Lawrence)

Response: MTA NYCT has evaluated the turning radius from Kenmare Street to Cleveland Place and determined it sufficient to accommodate proposed bus routes. See Response to Comment 77 which notes that minimizing bus turning movements is critical to reducing pedestrian and vehicular conflict.

Comment 79. It’s obvious to me that having buses going down Kenmare Street is a nightmare for all who live, work, and have businesses there. Much more doable is having the bus go down Allen Street, which is way larger to absorb the size and multitude of buses. (Minsky, Gurkin, Nichols)

Response: Two of the four proposed interborough bus routes would turn north on Allen Street to proceed north on First Avenue. The purpose of having the other two routes proceed west on Delancey to Kenmare would be to reach the 6 train station at Spring St and the R/W station at Prince St sooner and to facilitate transfers to subway lines with available capacity and serving major destinations such as Union Square and Grand Central. See Response to Comment 70 for reasons why connections to the Lexington Avenue and Broadway lines are important.

Comment 80. The proposed L4 SBS service going southbound has two tricky turns: one at Houston & Second Avenue and another at Delancey Street and Allen Street. The M15 already has a hard time turning at Houston and Second Avenue. Traffic is regularly backed up in the middle of the intersection at Delancey Street and Allen Street so there won't be space to turn. (Also the bus will be turning across the two-way protected bike way on Allen Street.) Why not have the L4 SBS go down Chrystie Street and turn on Delancey Street? That eliminates a turn. (I think the M15 was diverted to do just this for a few years, so it is already a tested route.) (Wolfson)

Response: Chrystie Street was considered for the L4 route. However, at some times of the day, there can be slower travel speeds on Chrystie Street than Allen Street. For the duration of the L Tunnel Reconstruction project, NYCDOT would install a left-aligned bus lane on southbound Allen Street, as well as a protected bus-only left turn signal phase, to assist with the left turn onto Delancey Street. This is expected to allow several buses to make that turn within one signal phase. Per standard practice, NYCT Bus dispatchers would monitor traffic conditions and under heavy congestion conditions on Allen Street, buses would be directed to travel via Chrystie Street.
Comment 81. The volume of L1 and L4 passengers arriving from Brooklyn and disembarking at the 1 Av stop to make a transfer to crosstown bus services presents concerns. The high boarding volumes could easily cause delays. Additionally, the drop-off point for the L1 and L4 shuttles is in front of a school building, on an already highly congested street that features heavy foot and car traffic, local hospitals, a dormitory, a park, and a bike lane. NYCDOT should consider reevaluating the East 15th Street commuter drop-off point and possibly relocating it. (Epstein)

Response: Most passengers exiting the L1 and L4 buses would not be transferring to another bus, but going to destinations near First Avenue. MTA NYCT will evaluate additional options for locating the stop prior to commencement of the approximate 15-month shutdown.

Comment 82. There should be more SBS service on 14th Street. (Vera)

Response: During the tunnel shutdown, the proposed ASP would include temporary SBS service on 14th Street, in addition to the existing M14A and M14D service. This would more than double the existing frequency of service on 14th Street. The temporary M14 SBS would operate with a headway of under two minutes during peak hours. This is basically the maximum operating capacity that can be accommodated on 14th Street during the closure. The M14 SBS and M14A and D are projected to have loads within service loading guidelines. MTA NYCT would monitor loading during implementation of the proposed ASP. As described in Section 5.2.3.2, “14th Street Corridor Bus Enhancement,” of the SEA, after the end of the tunnel closure, MTA NYCT and NYCDOT would end the temporary M14 SBS but may consider implementation of a permanent M14 SBS as a separate, independent project. Additional planning, agency coordination, public outreach, and/or appropriate environmental analysis of this potential permanent change would occur at a later point.

Comment 83. Although the SEA states on page 24 that it considered an “SBS Option” for 14th Street, no data is provided for that option. Two things are clear from the Aimsun report. The first is that it is not based on any actual traffic count. It is based on modeling. Second, it shows that the SBS Option is equally as fast for crosstown traffic on 14th Street as the busway option and causes less delay on 12th, 13th, 15th, and 16th streets, the crosstown streets studied. The NYC DOT and MTA NYCT deliberately hid or ignored that data when it compared options. (Schwartz)

Response: A variety of data was collected for the modeling effort including actual traffic volume counts, actual turning movement counts, actual pedestrian crosswalk counts, and actual speed and travel time data. Supplementary traffic modeling information was made available for public review through the web-site associated with the Canarsie Tunnel Project. MTA NYCT and NYCDOT provided the public with the Aimsun modeling results, as acknowledged in this comment. This comment, however, misunderstands the purpose of the Aimsun model outputs in this scenario, which was just one of many pieces of information that MTA NYCT and NYCDOT considered when planning the ASP. As explained in Appendix E, the model does not fully account for conflicts such as between buses pulling out of stops and merging with general traffic, especially with bus service as frequent as is planned for 14th Street, and tends to under-represent the degree to which these instances can bring bus service to a halt for multiple signal cycles. These sorts of blockages would be much more prevalent under an SBS option. In Appendix E, the potential for offset and curbside bus lanes is considered in the
context of other changes in the use of 14th Street, including additional numbers of people waiting for buses, crowding of pedestrians and riders near bus stops, additional people entering and exiting stations from north-south subway lines, and additional people walking across 14th Street. With these increases in pedestrian activity, NYCDOT and MTA NYCT identified the need for added pedestrian space along the busiest stretch of 14th Street. With the added pedestrian space, there is not sufficient space to accommodate general travel lanes and bus lanes. For these reasons, the SBS Option was eliminated from further consideration.

Comment 84. Many of the current L train riders walk to the 1 Av stop from further east and will add riders to the already overburdened M14 non-SBS service at stops along 14th Street. (Huebsch)
Response: The M14 SBS would operate at high frequencies and with fewer bus stops across 14th Street and therefore it is expected to carry the majority of crosstown customers. The off-board fare collection and all-door boarding feature of the M14 SBS buses would also reduce dwell times and be more attractive for crosstown customers. While some M14A and M14D riders may opt for the M14 SBS, there may be additional riders on the M14A and M14D. MTA NYCT would closely monitor ridership of the M14A and M14D as well as many additional local bus routes that are likely to see increased ridership. As is standard practice, MTA NYCT plans to hold extra buses and operators in reserve that can be quickly deployed by MTA NYCT Department of Buses management in places where it is deemed necessary by increased ridership.

Comment 85. Please add buses every 10 minutes from Lorimer St L train stop to 14th Street and First Avenue. (Hernandez)
Response: The L1 interborough bus would stop near the Lorimer St station at Union Avenue and Grand Street, serving 14th Street and First Avenue, with peak headways of 2½ minutes. Off-peak headways would be at most every 10 minutes.

Comment 86. Put the SBS buses on 12th Street and 13th Street. These streets allow for an easy turnaround at Greenwich Avenue and First Avenue. This will put less traffic on 12th Street and 13th Street than diverting cars from 14th Street. (Feldman)
Response: SBS bus service on 12th and 13th Street would be difficult to implement in terms of effects on the community (these side streets are smaller scale and more residential), effects on pedestrian circulation and bus loading (there are uniformly narrower sidewalks and pedestrian circulation combined with bus loading would be constrained), and limited access to subways (SBS service could be up to two blocks away from the key north-south subway entrances). 14th Street is the commercial corridor of the area with two directions of travel, wide sidewalks, high levels of pedestrian traffic, along with existing crosstown bus service and subway entrances. The businesses along 14th Street rely on continued access to this foot traffic and pushing them up to two blocks away would not be appropriate.

Comment 87. We are concerned about the amount of buses available during the project and not using clean air/low noise buses 100 percent of the time. (Dowson, Epstein, Wortman)
Response: As part of ongoing fleet renewal, MTA NYCT has developed a plan to ensure that 200 buses would be made available to the temporary bus services to be implemented as part
of the ASP. All diesel buses used for the ASP would be fully compliant with current emissions control technology that achieves up to 95 percent particulate matter emissions reductions in comparison to older technologies. In addition, ASP routes would utilize five electric and 10 hybrid standard buses on the L routes starting in April 2019 and an additional 15 electric articulated buses would begin service on the M14 SBS in the Fall of 2019.

Comment 88.
How many of the new electric buses will be allocated to the M14A and D routes? (Huebsch)

Response: There would be no electric buses on either of the M14A or D routes. However, all diesel buses used for the ASP would be fully compliant with current emissions control technology that achieves up to 95 percent particulate matter emissions reductions in comparison to older technologies.

Comment 89.
There are lots of buses on 14th Street. These are not just MTA buses but tourist and university buses. The MTA plans do not account for these other buses. (Groncki)

Response: The ASP recognizes the large number of public and private buses that already use 14th Street. NYCDOT has met with tour operators and universities about their bus operations. All types of buses would have access to the busway on 14th Street under the ASP. Other vehicles would be subject to non-bus regulations, where only local access along 14th Street would be permitted.

Comment 90.
Why not have additional drop off points, and some buses that go farther north or south? (Zieher)

Response: The concept of the interborough buses are relatively short routes with high frequencies that connect to subways with available capacity as soon as possible. If buses were extended further north or south, each bus would take longer to make a round trip, which effectively leads to a reduction in capacity. Additional drop-off points would add to the overall travel times of the bus routes.

Comment 91.
The SEA identifies bus parking for shuttle buses at Tenth Avenue and 39th Street; there is no mention of how buses will get there. (Davies)

Response: MTA NYCT specifies routings from depots/parking facilities to/from start points of routes. The routing for these buses have not yet been developed but would be when the schedules are developed for the route in advance of the closure. As with typical MTA NYCT operations, buses arriving to and from parking facilities would use designated routes and, based on the timing of these movements, would take place during off-peak hours. Bus parking for the M14 SBS would be in Manhattan as noted in the comment and described in the SEA (Section 5.2.3.4, “Temporary Storage Facilities”); interborough buses would use the Metropolitan Avenue lot in Brooklyn as described in the SEA.
Comment 92. We anticipate that mixed fare collection methods (on-board and SBS) along the 14th Street busway will lead to delays. Commit to off-board fare collection on Local Buses M14A & D. Off-board fare collection is needed all along 14th Street or else the local routes will experience delay and the stations will saturate. While we acknowledge this potentially leads to difficulty in verifying fare payment along the local bus routes, we believe this is a better approach. Alternately, we would ask the MTA board to consider suspending fare collection along the 14th Street Busway during the shutdown as a means of mitigating delays. Fares should be eliminated during the shutdown to minimize potential conflict among local and SBS buses running one minute apart. MTA should provide free transfers between M14A/M14D and M14-SBS buses for the duration of this project. (Community Board 4, Groncki, Scheyer, Transportation Alternatives, Liff)

Response: MTA NYCT does not anticipate any significant delays associated with interactions between M14A and M14D and the M14 SBS as bypass lanes would be provided adjacent to each bus stop to allow M14 SBS buses to pass any M14A or M14D buses picking up riders. M14 SBS fare receipts would be honored on M14A and M14D buses. If fare-free bus service were to be provided on 14th Street, ridership demand could potentially overwhelm capacity; therefore, MTA NYCT will not be suspending fare collection.

Comment 93. There will be MetroCard “readers” at SBS bus stations but no provision for adding fares to MetroCards for tens of thousands of customers (who normally do that in subway stations). After the L train stations shut down, there will be no MetroCard vending machines for at least a mile to the east of the 14th Street-Union Square subway station. When the station entrances are closed-off, what will become of the dormant, unused machines in their underground mezzanines? The physical MetroCard vending machines could be moved to temporary street-side “MetroCard vending shacks” set up near the M14-SBS station at 1st Avenue and East 14th Street, and to the MTA ferry docks at North Williamsburg and Stuyvesant Cove (which will serve as a temporary M14-SBS bus terminal). (Scheyer)

Response: MTA NYCT will implement mobile MetroCard vans within the 14th Street corridor at locations determined based on need.

Comment 94. Extend the 14th Street Busway beyond Third and Ninth Avenues. Extend the 14th Street Busway east of Third Avenue to accommodate L Shuttle bus transfers at 1 Av and ferry transfers at Avenue C to accommodate high bus volumes east of Third Avenue (many ferry passengers will be using those buses). The “exclusive” bus corridor is needed as this is the most heavily patronized section of the entire bus corridor. Delay associated with high boarding volumes at First Avenue and 14th Street will further necessitate a bus lane (and a dedicated passing lane for buses) at this location. (Scheyer, Transportation Alternatives)

Response: As established and described in Section 5.2.3.2, “14th Street Corridor Bus Enhancement,” of the SEA, M14 SBS service is specifically intended to provide service to the easternmost sections of 14th Street, using Avenue C to access a temporary SBS terminal stop under the FDR to connect with the Stuyvesant Cove ferry pier at East 20th Street and the temporary ferry service of the proposed ASP (as well as access for residents of Stuyvesant Town and Peter Cooper Village). However, in terms of the physical template of the busway, traffic modeling suggested that extending...
the busway beyond Third Avenue to Ninth Avenue did not result in better bus times overall (see Appendix E of the SEA).

**Comment 95.** Some bus routes, like the Q59, could replace some of the direct shuttle buses, especially since that bus passes the Grand St L train station. (Moss)

**Response:** Extending the Q59 into Manhattan as a replacement for the shuttle routes would make a very long route that would compromise its ability to be reliable. Additionally, the Q59 is not an SBS route so passengers would have to pay on board, further increasing dwell times, run times, and reducing reliability.

**Comment 96.** I strongly recommend restoring the M9 Avenue B bus route and M21 Avenue C bus routes to their pre-2010 service-cut alignments. The M9 running over this segment of East 14th Street to Union Square can provide many of the additional buses that are needed. Union Square, and the areas immediately surrounding it are the ultimate destination (or transfer hub) of the largest contingent of riders on the 14th Street corridor now and during the L-Train shutdown. (Scheyer)

**Response:** Rerouting the M9 and M21 would adversely affect current riders on those routes. The M9 and the M21 have inadequate capacity to carry the significant number of displaced L riders. The M14 SBS would provide the necessary additional service.

**Comment 97.** Will the MTA fix the M15 local bus stop at First Avenue and 14th Street before the shutdown? Currently, the cutout for the M15 local is too short—the bus extends into the cross-walk and obscures the walk light, especially those headed east to Stuyvesant Town. There is ample room to extend the cutout 3 feet without impeding the M15 SBS. (Huebsch)

**Response:** The current M15 SBS stop is approximately 120 feet in length, which exactly accommodates two 60-foot articulated M15 SBS buses that may arrive at the same time. Unfortunately, the M15 SBS bus stop cannot be moved further north without impacting the service road, and it cannot be shortened by three feet to lengthen the local M15 stop. NYCT will work with the drivers of the M15 SBS and M15 local bus route to remind them of the need to pull as far north as possible to minimize the frequency and degree to which the bus extends into the crosswalk. As noted in Section 8 of the SEA, MTA NYCT and NYCDOT will monitor traffic conditions during the approximate 15-month shutdown in a dynamic and responsive manner and make adjustments to optimize performance in order to minimize impacts.

**Comment 98.** How can the MTA NYCT and NYCDOT possibly consider running diesel buses up First Avenue to 14th Street 24/7? How can the MTA/DOT ignore the fact that the [FDR Drive] already has exits onto the same streets which are expected to absorb traffic overflow? (Dinhofer)

**Response:** Please see the Responses to Comments regarding air quality below, starting at Response to Comment 233, as well as Section 6.2 in the SEA. As a limited access highway, the FDR Drive, located approximately ¾ mile east of First Avenue, has few intersections with local streets intersecting with First Avenue.
Comment 99. MTA NYCT should include in the ASP a plan for increased shuttle bus service between the Bedford Avenue G train station and the Bedford Avenue J/M/Z station at Marcy Avenue, and between Bedford Avenue and the proposed ferry. (Maloney)

Response: The L3 and L4 interborough bus routes would connect to the Marcy Av J/M/Z station, but it would be faster to remain on the L3/L4 buses and go to the Essex St/Delancey St F/J/M/Z station. The ASP would include continuation of L train service between Bedford Avenue and the G train at Metropolitan Av/Lorimer St. A bus connecting the Bedford Avenue area to the proposed ferry was considered, but was projected to attract very low ridership, because it would not be time-competitive for most riders. As an alternative, the L4 interborough bus service would run from Bedford Avenue to 14th Street and First Avenue, supplementing ferry service. The L3 and L4 interborough bus service would also connect Bedford Avenue and the J/M/Z trains at Essex St/Delancey St for westbound service. For eastbound service from Bedford Av, the L train will still be running. Finally, the B62 bus provides service between Bedford Avenue and Nassau St on the G train.

Comment 100. Expound upon street treatments at L Shuttle Transfer points in Brooklyn and Manhattan. Needed treatments are still missing from Bedford Avenue and Roebling Street, as an example, where buses are supposed to operate every two minutes. Without a proper street design, the L Shuttle Buses will face extreme delays to the point of being almost useless. (Transportation Alternatives)

Response: See Section 5.2.3.1, “Temporary Interborough Bus Service,” of the SEA. Temporary bus priority treatments would be installed along Grand Street, Borinquen Place, and Roebling Street in Brooklyn. These temporary treatments may include roadway resurfacing, painted pedestrian spaces, red painted bus lanes, roadway markings, bus stop curb extensions, and changes to street direction.

Comment 101. At-Level Boarding for every passenger. The city has floated the description “near level” to describe bus boarding capability. Install features on 14th Street to match the M14 Bus boarding height, for ADA accessibility and ease for all passengers. This small accommodation has an enormous multiplier effect per passenger—at risk of causing big delays across the system. (Transportation Alternatives)

Response: The temporary bus boarders will be “near level” and not match the M14 bus boarding height. While the wheelchair ramp will take more time, MTA NYCT is unable to provide at level boarding without the ramps because the temporary bus boarders are premanufactured. In order to achieve at level boarding, new concrete extensions that match the height of the buses would need to be installed which may also require the adjoining sidewalk to be reconstructed to be flushed with sidewalk extension and that is beyond the scope of this temporary project. The ASP would consist of very high-frequency bus services, most of which would be temporary. As such, NYCDOT has focused on addressing the increases in projected bus volumes during this period using temporary materials. The proposed curbside “bus boarders” that would be installed at several locations under the ASP are a modular product that provides a uniform curb reveal for the length of each stop. For the purposes of maintaining full ADA accessibility during the tunnel reconstruction, all MTA NYCT buses would be equipped with wheelchair ramps that would provide step-free access from the temporary “bus boarder” on to the bus.
Comment 102. The 14th Street busway should include ADA-accessible bus boarding zones. (Keller, Lunceford-Stevens, Clausen, Rothman, Asher)

Response: See Response to Comment 101.

Comment 103. I like the idea of extending the curb temporarily into the street (a “bus bulb”)—and this should be to expand the size of a bus stop waiting area. This should be done on the eastbound side of Union Square South between University Place and Broadway (perhaps, even extending as far as Fourth Avenue). Even more important—this is where the subway's stairway entrances are, and this geographic proximity minimizes walking. I am concerned about location of bus stops in Union Square area (as shown on Appendix Figure D3) and it is critically important to keep the eastbound M14A and M14D bus stops at Union Square where they currently are—in front of the Whole Foods supermarket. It also makes logical sense to host the Union Square M14-SBS station here for the duration of the L Train shutdown. On the other hand, it inures to no bus rider's benefit to eliminate the Union Square bus stop where it now exists—located on Union Square South—only to move it across University Place, while also eliminating the Fifth Avenue eastbound M14A/M14D bus stop—consolidating them there. There should be free transfers among bus lines, sidewalks should be extended into streets. Sidewalk obstructions should be eliminated. Buses need to be able to move and people should be able to move. (Scheyer)

Response: Appendix D of the SEA shows the ASP design for the 14th Street busway, and many of the ideas proposed here—such as curb extensions between University Place and Broadway—are in the ASP design. The M14A and D stops at Union Square South and Fifth Avenue would be consolidated to just west of University Place in order to allow for more pedestrian space where sidewalks are most congested, such as Union Square South between University Place and Broadway. Widening the sidewalks on both the south and north curbs would result in one travel lane in each direction and therefore a bus stop could not be placed between University Place and Broadway. Customers may transfer between the local and the SBS routes on 14th Street.

Comment 104. I can recommend an easy fix for the problem of elimination/consolidation of the Fifth Avenue bus stop: move the M14A and M14D bus stop to the southwest corner of West 14th Street and Fifth Avenue away from University Place—a block away—and create a very quick-and-easy (and safer) same-side-of-the-street transfer with downtown Fifth Avenue Local and Limited buses. (Scheyer)

Response: MTA NYCT does not anticipate there to be a significant market for eastbound M14 to southbound Fifth Avenue bus service. Eastbound M14 customers can alight the bus at far side of Sixth Avenue and walk one block east to a southbound Fifth Avenue bus without crossing the street.
Comment 105. Ensure late nights and weekends receive increased M14 bus service and not just weekday peaks. Leave room for 24/7 service. If it is found that Busway hours need to be expanded 24/7, we should be prepared to do so, beyond running the L2 and L4 buses every 10 minutes overnight. The hours of operation of the M14-SBS bus running to Avenue C and E. 20th Street need to correlate with the hours of proposed operation of a temporary ferry service: Sunday to Friday until 12 midnight and Friday and Saturday until 2AM. The bus lane’s period of “exclusivity” should correspond to these hours, as well, because 14th Street is active late into the evening and night. (Akhmetov, Scheyer, Transportation Alternatives, Boursier, Hales, R. Martin, Sholl, Kneidl)

Response: Proposed bus service in the ASP is 24/7. There would be greater frequencies of bus service across 14th Street at all times of day. As noted in Section 8 of the SEA, MTA NYCT and NYCDOT will monitor traffic conditions during the approximate 15-month shutdown in a dynamic and responsive manner and make adjustments to optimize performance in order to minimize impacts.

Comment 106. We know that there will be an increase of buses being used and it is integral to make sure that residents and commuters have dependable service (Adams)

Response: Comment noted. The ASP includes bus priority elements to ensure the reliability of bus service.

Comment 107. I would like to encourage and support the 80 bus trips per direction in the peak hour and also bus priority treatment on the Williamsburg Bridge. Providing these bus priority treatments, especially along portions of Grand Street, Boringuen Place, and Roebling Street, can help with keeping bus frequency travel times and mitigate to the greatest extent possible the impacts of the shutdown on local communities. In addition, we must have an equitable distribution of electric buses being used in Brooklyn and Manhattan. MTA New York City Transit will deploy 25 electric buses during peak hours in Manhattan and I urge that Brooklyn have an equitable distribution of electric buses as well. (Adams)

Response: ASP routes would utilize five electric and 10 hybrid standard buses on the L bus routes starting in April 2019 and an additional 15 electric articulated buses would begin service on the M14 SBS in the Fall of 2019. Diesel, electric, and hybrid-electric buses will be used for the Brooklyn-based interborough bus routes.

Comment 108. Widths of cars and buses on streets are out of scale in diagrams, buses are not the same size as cars, bus lanes are not at right width, heights of buses and cars are not to scale, turning radius diagrams are not realistic, studies should be re-examined. (Campo, Fleischer, Mulhauser, Robinson)

Response: NYCDOT develops dimensioned AutoCAD drawings for every project that are field verified before, during, and after implementing new street designs. Graphics in the SEA depicting typical busway cross section are based on detailed NYCDOT drawings and are representational only.

Comment 109. The four temporary bus stops at Avenues B and A are missing Bus schedules and QR codes for use with the Bus Time app. These may be harder for the temporary M14A Stops on Avenue A as they are both missing bus shelters. (Huebsch)

Response: MTA NYCT will provide bus schedules and QR codes where appropriate and feasible.
Comment 110. Why not consider extending the B32 bus through the Queens Midtown Tunnel and terminate at Grand Central Station? This would give Williamsburg, Greenpoint, and Long Island City riders a direct bus service to Midtown Manhattan, and reduces the overcrowded E/G/M and 7 trains. This would give B32 bus riders connections to the 4/5/6 trains at Grand Central Terminal as well as making transfer connections to the M1, 2, 3, 4, 15, 42, 101, 102 & 103 buses. Maybe add Sunday service to the BM2 MTA route. (Dinhofer, Follo)

Response: MTA NYCT has a limited number of buses that could be deployed to serve the ASP. In collaboration with stakeholders, MTA NYCT determined that the most efficient way to serve most riders is to have shorter bus routes that get riders to a subway quickly and provide more frequent service. Williamsburg, Greenpoint, and Long Island City connections to midtown Manhattan are served by an enhanced G train connecting with the E/M/7 trains at Court Sq station and getting riders to subways quickly will help minimize traffic impacts.

Comment 111. The added congestion at the Bowery/Delancey intersection will negatively impact the service of the Bowery's 103 Bus; already a notoriously late, infrequent service. As a senior who uses a cane to walk, I am unable to manage subway stairs. I depend upon the 103 bus. (Wright)

Response: With the HOV3+ policy that would be implemented on the Williamsburg Bridge, vehicular traffic across Delancey Street is expected to be reduced significantly. The reliability of the M103 is not expected to be affected by the proposed ASP.

Comment 112. All buses do not have to traverse on 14th Street. The MTA can divert buses to 23rd and 34th with the majority of the crosstown buses using the 14th. (Greenspan)

Response: One of the objectives of the proposed ASP is to retain transit service along the 14th Street corridor to replace transit access temporarily lost due to the 15-month tunnel shutdown. Diverting buses to 23rd Street or 34th Street would not achieve the objective of providing transit access to businesses and residents along the 14th Street corridor.

Comment 113. There should be no bus stop at the intersection of Spring Street, Cleveland Place and Lafayette Street. (Tenenbaum)

Response: The L2 and L3 interborough bus routes would have a stop adjacent to the Spring St 6 train and Broadway-Lafayette St B/D/F/M train stations. These stops would provide connections for riders to continue their trips in the quickest way possible.


TRAFFIC AND ROADWAYS

**Comment 114.** While we agree that the “no action” scenario is not viable, and we understand that this is for the greater good, the administration remains responsible for performing a traffic assessment for these side streets, and propose real mitigation measures that will alleviate the foreseeable problems. The ASP needs more traffic impact analysis. (Community Board 4, Goodwin)

**Response:** As described in Section 5.2.3, “Bus,” of the SEA, there was an extensive traffic impact assessment for both the Williamsburg Bridge corridor (including approach street networks) and the 14th Street corridor (including the most affected side streets). In both corridors, four different scenarios were analyzed as described in Section 5.2.3.

That analysis was based on microsimulation modeling (Aimsun) combined with regional travel demand modeling with the New York Metropolitan Transportation Council (NYMTC) Best Practice Model (BPM) and MTA ridership models.

The 14th Street network includes 12th to 16th Streets between Avenue C to First Avenue and Second Avenue between 14th and 20th Streets, and East 20th Street between First Avenue and Avenue C.

The Williamsburg Bridge/Delancey Street Aimsun subnetwork includes Williamsburg Bridge/Delancey Street from Bowery to Brooklyn to include the ramps from/to Brooklyn-Queens Expressway (BQE), ramps from/to local streets as well as Borinquen Place to Union Avenue, 5th Street and Broadway to Rodney Street.

The results showed that the package of street treatments in the ASP would provide the greatest mobility for L train customers while minimizing, or in some case improving, conditions on surrounding streets, when compared to the No Action Alternative.

The analysis provided sufficient evidence that conditions with implementation of the ASP would not result in significant environmental impacts in comparison with the No Action condition and that a more detailed traffic impact assessment was not warranted.

**Comment 115.** Your traffic “data” is not data, but some sort of incomprehensible “modeling.” There has been no real analysis of actual traffic. No count of the number of cars on various streets, no count of trucks, no count of trucks on side street, no analysis of impact on 11th, 17th, 18th, 19th and 20th Streets. The lack of real traffic data makes the SEA conclusion that there is “no increased pollution,” “no increase in noise” and “no increase in vibrations” baseless. The SEA does not address alternatives. The lack of real traffic data causes a safety problem the SEA does not discuss: major response delays for ambulances going across town from Northwell Health, and fire trucks from the 10th Street firehouse. To address the impact on our quality of life, the Federal Transit Administration and MTA must expand the scope of SEA and should undertake a full Environmental Impact Statement to evaluate the impact on 17th and 18th Streets and streets north of us. (Bond, Glassman, Klein, Ingall, Harvey, Schwartz)

**Response:** There are several components to this comment which are addressed individually below.

The modeling effort described within the SEA and in the Response to Comment 114 required MTA NYCT and NYCDOT to populate the various software products with existing conditions data. A variety of data were collected including actual traffic volume counts, actual turning movement counts, actual pedestrian crosswalk counts, and actual speed and travel time data. Supplementary traffic modeling information was
made available for public review through the web-site associated with the Canarsie Tunnel Project.

A “model” was necessary for this analysis, to take existing conditions data as a baseline and project the relative effects of the proposed tunnel reconstruction and the related ASP. The data collection effort described above was used to calibrate and validate the models – i.e., to ensure that the models adequately represent existing conditions and then can be used as a base for projections.

Appendix E of the SEA describes the methodology and geographic scope of these models. The tools used to predict the impacts of the L train tunnel closure and the ASP are industry-standard techniques that have been used in multiple projects in New York and throughout the world. As described in Appendix E of the SEA, these models include NYMTC’s BPM, a “microsimulation” model using Aimsun software, as well as MTA NYCT’s in-house travel demand model based on MetroCard data.


More information on Aimsun software is available at this link: [https://www.aimsun.com/](https://www.aimsun.com/)

MTA NYCT’s in-house travel demand model has been used for over 15 years, and has successfully projected the impacts of multiple service changes during that time. Most recently it was used to project ridership on Phase 1 of Second Avenue Subway, with observed volumes coming within 2.5 percent of projections (and rising). It also correctly projected the number of customers that would shift to the L train during the recent Myrtle Viaduct project which interrupted M train service from June 2017 to April 2018. Given that the Myrtle Viaduct project affected travelers in markets that overlap with the L train tunnel markets, the fact that the model performed well is further validation that it is the best available tool for predicting how L train customers will behave during the closure.

Analysis of Impacts on Side Streets Beyond 12th and 16th Streets

Including a wider area of streets would have provided more detailed insights on the impacts to additional streets. (Note that the Aimsun model does include 14th through 20th Streets on the eastern part of the corridor from 2nd Avenue to Avenue C.) However, the first step of the modeling process—the regional model using NYMTC’s BPM—did in fact assess impacts on multiple crosstown streets as listed below.

East-West streets included in BPM Network are Houston Street, Washington Square South, Washington Square North, 9th Street, 12th Street, 13th Street, 14th Street, 15th Street, 16th Street, 17th Street, 18th Street, 23rd Street, 29th Street, 30th Street, and 34th Street.

The regional model showed the greatest impacts on 12th through 16th Streets. The impacts on 17th Street and 18th Street were less than half of the impacts on 15th Street and 16th Street. This may seem counter-intuitive, because 15th Street and 16th Street are discontinuous, as Union Square Park cuts them into two sections. But, this geometry is only relevant for the sub-set of auto trips that begin on 14th through 16th Streets east of Park Avenue, and end on 14th through 16th Streets west of Union Square (or vice versa). Just as commenters have noted that most L train trips either begin or end their trip outside of the 14th Street corridor, the same is true for auto trips. For trips
that begin or end to the north or south of the corridor, it will generally be more logical to travel along an avenue and cross east-west along any number of streets between Houston and 34th Street, or beyond. For those trips, there is no particular reason to use 17th Street or 18th Street. This will lead to a wide dispersion of impacts. In addition, there is a greater density of traffic on the West Side than on the East Side in part because the road geometry on the East Side is broken up by Union Square Park, Stuyvesant Square and Stuyvesant Town. Thus, it is not surprising that 15th Street and 16th Street would see greater traffic shifts than 17th Street and 18th Street.

Given the relatively modest impacts in terms of travel speeds to the most significantly affected side streets (12th, 13th, 15th and 16th Streets) relative to the No Action Alternative (on average 4 percent in the AM peak hour and 10 percent in the PM peak hour, as shown in Appendix E of the SEA), it was determined that a more detailed traffic impact assessment of additional side streets was not warranted to make the environmental finding that the ASP offered a far improved transit and transportation condition than the No Action Alternative.

Emergency vehicles will not be able to travel through the side streets

Emergency vehicles would be allowed to travel across 14th Street, as well as through all side streets, under the ASP (see Section 6.7.2.4 of the SEA). On 14th Street, they would be able to take advantage of the significantly improved travel times within the busway, saving over 11 minutes versus the No Action Alternative in the morning. In the afternoon peak, vehicle times would average 5½ minutes between Avenue C and Ninth Avenue versus 16.7 minutes in the No Action condition (see Appendix E of the SEA). By the criteria of emergency vehicles, the ASP would perform better than the No Action Alternative.

Comment 116. We would like the DOT to study the implementation of designated turn lanes onto the avenues from the side streets, as well as neck downs at the entrance of the streets. (Community Board 4)

Response: NYCDOT is undertaking an evaluation of locations where interventions such as these might be appropriate on residential side streets near 14th Street.

Comment 117. We recommend an area-wide restriction on tour buses during the shutdown, through the affected area and side streets, to leave maximum capacity to commuters. (Community Board 4)

Response: The ASP recognizes the large number of public and private buses that already use 14th Street. NYCDOT has met with tour operators about their bus operations. All types of buses would have access to the busway on 14th Street under the ASP. Other vehicles would be subject to non-bus regulations, where only local access along 14th Street would be permitted.

Comment 118. Why not flow traffic through several side streets instead of only 13th Street? (Espina)

Response: As described in Appendix E of the SEA, it is anticipated that traffic that would be diverted from 14th Street would use any of the side streets in close proximity, not just 13th Street.
Comment 119. There are often street fairs that start or end at 14th Street, especially on the East Side. To prevent them from interfering with avenue traffic while still preserving this uniquely NYC institution, I suggest that none be allowed between 12th and 16th Street from river to river. (Huebsch)

Response: NYCDOT and other relevant city agencies will take these considerations into account in the evaluation and approval of street fair permits.

Comment 120. What happens when there is garbage pick-up and the traffic is backed up and idling until the trucks move? (Calimano)

Response: On all streets within the ASP, sanitation vehicles would be able to operate as they do currently. The conversion of the curbside lane from parking lane to a bicycle or bus lane would not change the operation.

Comment 121. St Francis Xavier Church handicap access is on 15th Street, how will that be impacted? (Calimano)

Response: ADA-compliant access on 15th Street would remain unchanged with the temporary ASP in place.

Comment 122. How will snowfall affect the two-lane sections of the proposed 14th Street corridor? (Myrstad)

Response: The ASP busway between Third Avenue and Ninth Avenue would have three lanes as well as curbside loading areas and snow plowing and snow removal would not be severely restricted. NYCDOT would coordinate snow removal operations with NYC Department of Sanitation. As with any City street, the plow line would be at the curb using a transition to the sidewalk. With the additional temporary sidewalk extension and bus loading areas, there would be additional space to absorb the plow line thereby minimizing the loss of the existing 14th Street sidewalk area. Furthermore, the sidewalk extensions at bus stops would be composed of a durable material that would withstand plowing operations in heavy snow.

Comment 123. With restrictions on the Williamsburg Bridge, car traffic looking to go between Brooklyn and Manhattan will be diverted to other crossings, such as the Brooklyn Bridge, Manhattan Bridge, Hugh Carey Tunnel, and Queens-Midtown Tunnel. Since car traffic will be displaced to all of those crossings for the 15-month duration of the shutdown, will there be any work done on those crossings to reduce the impact of displaced car traffic on those streets? (Clemente)

Response: Based on the multiple opportunities for diverted traffic to seek alternate crossings (or to shift to an HOV3+ trip, shift to transit, or to make the trip at a different time or not at all), it is anticipated that there would be wide dispersion of trips over a temporary 15-month period, but that the largest shifts would be to the nearest non-tolled crossings. As described in Section 8 of the SEA, MTA NYCT and NYCDOT will continue to monitor traffic conditions as the ASP is implemented and will make changes as warranted.
Comment 124. A bus only lane (or lanes) on the Williamsburg Bridge would greatly increase the capacity of the buses, since they would be able to make their trip much more quickly, allowing more trips by each bus. (Moss)

Response: The evaluation of temporary interborough bus service considered options for the use of bus lanes versus the proposed approach of HOV3+ (see Section 5.2.3.1, “Temporary Interborough Bus Service,” of the SEA). A dedicated bus lane without other access restrictions was found to not provide the needed capacity and travel time for increased bus service since the lane configuration would be constrained by access and the configuration of inner and outer roadways of the bridge.

Comment 125. How will HOV3+ on the Williamsburg Bridge be enforced? (Davies)

Response: NYCDOT would implement appropriate signage including a possible mix of variable messaging and fixed signs providing guidance to motorists. Public education and outreach would also begin well before the implementation of HOV3+ restrictions. NYCDOT and MTA NYCT are working with NYPD to ensure that there would be proactive enforcement along the corridor.

BROOKLYN

Comment 126. Will there be any impact mitigation work done on the local streets in Williamsburg and other affected neighborhoods to reduce the impact of displaced traffic onto local streets? (Clemente, Awe)

Response: As mentioned in Section 5.2.3.1, “Temporary Interborough Bus Service,” of the SEA, there may be minor temporary bus priority treatments (which may include roadway resurfacing, painted pedestrian spaces, red painted bus lanes, roadway markings, bus stop curb extensions, and changes in street direction) in order to support the interborough bus services. Since the Williamsburg Bridge would be limited to HOV3+ only, traffic volumes on and around the bridge are expected to be reduced; therefore, mitigation is not warranted. Nevertheless, MTA NYCT and NYCDOT will be undertaking further analysis on the local streets in Williamsburg to limit the effects of traffic shifts, and, as with other ASP elements, would monitor conditions as the ASP is implemented and would make changes as warranted.

Comment 127. I am enclosing a letter from Community Board 1 sent to DOT last month requesting repairs and improvements to road markings, hazards and traffic signals at critical intersections and corridors in the community. These are roads that will absorb increased bus and truck traffic as a result of the mitigation plan, and it is imperative that their infrastructure is sound and up to date before the shutdown beings. (Lentol)

Response: As mentioned in Section 5.2.3.1, “Temporary Interborough Bus Service,” of the SEA, there would be minor temporary bus priority treatments along portions of Grand Street, Borinquen Place, and Roebling Street in order to support the interborough bus services. These temporary treatments may include roadway resurfacing, painted pedestrian spaces, red painted bus lanes, roadway markings, bus stop curb extension, and changes to street direction. In the course of implementing these features, infrastructure would be updated as necessary to ensure its ability to handle any increases in traffic volume.
KENMARE & DELANCEY STREET/LITTLE ITALY AREA

Comment 128. The ASP did not properly balance the needs of L train riders against the needs of residents in communities directly affected by increased traffic, including the Kenmare/Little Italy neighborhood. There was not effective outreach to Manhattan neighborhood residents who will be affected by the ASP. There will be traffic increases along Kenmare and Mulberry Streets and congestion in the neighborhoods south of Houston Street and around Kenmare Street has been given inadequate assessment and is ignored. The Delancey and Kenmare intersection is overlooked and is always congested. (Campo, Davies, Glick, Goldberg, Lawrence, Tenenbaum, Markovitz, Nichols, M. Epstein)

Response: As summarized in Section 9 of the SEA and in SEA Appendix C, MTA NYCT and NYCDOT have presented to all host Community Boards and conducted numerous public workshops as the ASP was being developed. As part of the ASP, Kenmare Street would be reconfigured to have three westbound lanes and one eastbound lane. In the westbound direction, there would be one parking lane, one bus lane, and one through lane. In the eastbound direction, there would be one through lane. This was one of two options presented to the community and was the preferred option based on community input. With the proposed ASP, the introduction of interborough bus service with 80 new bus trips in each direction along Delancey Street and 48 new bus trips in one direction along Kenmare Street would be accompanied by a decrease in auto trips crossing the Williamsburg Bridge (projected at 3,000 to 3,500 vehicles in the AM and PM peak hours, respectively), which in turn would lead to reductions in trips along Delancey Street and Kenmare Street. Note that those bus frequencies reflect AM peak hour service. During off-peak hours, bus service levels would be lower to match demand, while the reduction in traffic volumes would remain at roughly the same levels throughout most hours of HOV3+ restrictions. Overall, the streets in question would be expected to have a decline in traffic volumes with the ASP, compared with the No Action Alternative.

Comment 129. The Williamsburg Bridge will be open only to High Occupancy Vehicles with 3 occupants or more (HOV3+) from 5 AM-10PM, seven days a week, for the duration of the shutdown. This will free up space for buses and reduce significantly the influx of vehicles entering the district, alleviating some of our concerns related to traffic congestion on adjacent streets. (Community Board 4)

Response: Comment noted.

Comment 130. The Grand Street access to the Williamsburg Bridge is already congested. How would the approximately 2,500 cars per hour that won’t be able to use the HOV lanes be diverted? (Loeb)

Response: While it is clear that there would need to be a very early and active campaign to educate drivers ahead of the HOV implementation, diverted traffic is anticipated to be widely dispersed to other crossings and drivers would not route themselves through the local entryways for the Williamsburg Bridge (or they could shift or consolidate to an HOV trip or other modes). As noted in Response to Comment 128, as well as Section 6.1.3.2 of the SEA, there would be a reduction in traffic volumes along the Williamsburg Bridge corridor due to the HOV3+ policy, and NYCDOT will be undertaking further analysis on the local streets in Williamsburg to limit the effects of traffic shifts. This reduction also includes roads that vehicles use to access the bridge.
Comment 131. As a Lower East Side resident, I am extremely concerned with the news that so much of the L train shut down traffic will be diverted over the Williamsburg Bridge and down Delancey Street. This portion of Delancey Street, and the LES in general is already suffering from the impact of extreme construction, added tourist traffic and the proliferation of new condos. (Beach)

Response: As noted in Response to Comment 128, as well as Section 6.1.3.2 of the SEA, the anticipated effects of the ASP in Lower Manhattan would be an increase of about 80 buses per peak hour in each direction but with a reduction of between 3,000 and 3,500 auto trips. That would lessen traffic volumes in the general Lower Manhattan network.

Comment 132. There is no analysis as to where any diverted cars and trucks would travel to get to their destination, but it is clear they would likely clog already-congested Grand Street OR, when confronted with a no turn sign, be forced to continue north onto Cleveland Place, conflicting with the L-2 and L-3 buses turning onto Cleveland Place. (Markovitz, Tenenbaum)

Response: See Response to Comment 130 as well as Section 6.1.3.2 of the SEA.

Comment 133. What provisions are being made to alleviate existing Holland Tunnel rush hour back-up traffic jams at Delancey/Bowery and Kenmare/Center St/Cleveland Place that will be aggravated by the L-train shuttle bus route? (Wright)

Response: As noted in Response to Comment 128, as well as Section 6.1.3.2 of the SEA, it is anticipated that there would be an overall reduction in volumes in and around the intersections noted in the comment. While this may not alleviate congestion specific to the Holland Tunnel access routes, it would not worsen conditions and no additional mitigation would be required.

Comment 134. How will this interfere with the fire houses in the Little Italy area? (Campo, Grubler)

Response: Through repeated consultations with New York City Fire Department (FDNY), MTA NYCT and NYCDOT has determined that there would be no direct displacement or blockage of fire houses or fire access routes.

Comment 135. Your SEA does not address economic impact for the Kenmare Little Italy neighborhood. The amount of traffic resulting from the MTA/DOT currently proposed bus route will result in a loss of business, to the extent that it will be extremely difficult to conduct business. (Tenenbaum, Markovitz)

Response: With the implementation of the HOV 3+ lanes on the Williamsburg Bridge, buses and trucks would be able to access the Kenmare Little Italy neighborhood. Businesses would still be able to receive deliveries from trucks. The number of pedestrians on the street in the Kenmare Little Italy neighborhood is not anticipated to change; therefore, the number of customers accessing local businesses would not significantly change.
Comment 136. The plan to run 70-80 diesel buses across the Williamsburg Bridge per hour will add to pollution in the Delancey St-Allen St/First Avenue corridor and will cause massive traffic backup all over the Lower Manhattan area, the consequences of which are not discussed in the SEA. On page 41 of the SEA, it is stated that the additional buses “may” create some congestion, “but” the report continues, “this would only be for 15 months.” The SEA does not explain how it will be possible that “these changed conditions” will not generate significant adverse transportation impacts. (Schwartz)

Response: As stated in Section 6.2.2.1, “Mobile Source Impacts,” of the SEA, with implementation of the HOV3+ policy on the Williamsburg Bridge, “overall traffic volumes on the Williamsburg Bridge and along the bus routes (routes L1, L2, L3, and L4) near the bridge would decrease under the Proposed Action compared with the No Action Alternative.” While there would be additional buses replacing the cars, “[t]he HOV restrictions and bus priority lanes would result in improved traffic speeds and reduced travel delay” which would minimize emissions of air pollutants from vehicles. As a result, there will be no significant impact to air quality in the referenced area. With respect to transportation impacts, the same paragraph referenced in the comment notes that “additional buses would be offset by the dramatic decrease along Delancey Street in localized traffic coming from or to the Williamsburg Bridge.”

14TH STREET CORRIDOR AND SIDE STREETS

Comment 137. Shutting down 14th Street between Third Ave and Ninth Avenue to cars between the hours of 5 AM and 10 PM is a ridiculous proposal for many reasons. It will definitely cause terrible traffic jams on all the avenues from Third Avenue to Ninth Avenue. Traffic jams will also be a constant presence on the side streets from 20th Street to 3rd Street as cars seek other ways across town. (B. Klein, Jones)

Response: As described in Appendix E of the SEA, the evaluation of 14th Street bus service options identified the proposed SBS and busway as the best solution in terms of accommodating the estimated 84,000 daily and 10,080 AM peak hour bus trips and minimizing travel delay on side streets. The traffic report did show 29 percent increases on side streets in the AM peak, and 50 percent increases in the PM peak. However, those statistics do not reflect total vehicular demand but throughput. These are different measures. For example, if 50 cars are lined up on a street, but congestion is such that none of the vehicles can move, the reported “traffic volume” would be 0 not 50. “Congestion” is best measured by speed. The increases in travel times across the side streets would range from an average of about 4 percent longer in the AM and 10 percent longer in the PM. In other words, in the worst case of the afternoon rush hour, a 10-minute drive across the corridor would on average increase to 11 minutes and 40 seconds.

However, even these modest traffic impacts of the ASP are likely overstated. When the traffic models were developed and executed, the scenario most similar to the current ASP was a busway that did not allow any private autos other than those entering or exiting 14th Street garages. After extensive public input, that policy was modified to allow any vehicle to enter 14th Street as long as they make the next available right turn, thus allowing local drop-offs and pick-ups. This revision in policy would allow slightly more traffic onto 14th Street. As a result, under the ASP there would be less auto traffic diverted from 14th Street and onto the side streets than projected in Appendix E of the SEA. That number is expected to be modest as a percentage of 14th Street flows, but more significant as a percentage of side street volumes.
On the other hand, the traffic impacts to the side streets in the No Action Alternative are almost certainly understated. As noted in Footnotes 10 and 11, in Section 6.1.3.1 of the SEA, as well as in Appendix E of the SEA, slower bus speeds in the No Action condition would likely lead to shifts into taxi and FHVs. In the No Action condition, bus travel times along 14th Street would be up to 7 minutes slower end-to-end in the AM, and 10 minutes slower in the PM. With 5,000 M14 SBS riders at its most crowded segment in the morning, and 6,000 riders including M14A and M14D riders, if only 4.7 percent of potential busway riders shift into taxis or FHVs, this would represent the same number of vehicles (284) diverted from 14th Street if 14th Street were closed to general traffic.

While the SEA does show modest impacts to the side streets in the ASP versus the No Action Alternative, it is plausible that the ASP could actually improve conditions on the side streets relative to the No Action Alternative.

**Comment 138.** The SEA did not adequately assess the effects of traffic, especially large trucks, diverted from 14th Street onto other east-west side streets. Manhattan east-west side streets are narrow and can’t accommodate additional vehicular traffic without adversely affecting residents. NYPD does not adequately enforce prohibitions against trucks on side streets. Side streets mentioned in the SEA do not carry through traffic beyond Union Square; additional side streets such as 20th Street should have been assessed since they provide continuous east-west routes. (de Riva, Pesin, Adelson, Lieberman, Jensen, Whitman, Davis, Cohen, S. Greenhaus, Jacques, Jones, Perich, Mear, Ashenmil, Skurnik)

**Response:** As described in Section 5.2.3.2, “14th Street Corridor Bus Enhancement,” of the SEA, under the ASP, local deliveries would be allowed access to 14th Street, so not all truck trips would be eliminated from 14th Street. Through trucks using 14th Street as a designated truck route would be diverted to an alternate truck route which would not include local side streets. Enforcement is an important community concern and a critical component of implementing and managing the ASP. As noted in Section 8 of the SEA, NYCDOT and MTA NYCT are coordinating with NYPD on truck enforcement along the corridor. Additionally, there would be enforcement cameras on 14th Street in order to enforce the busway through traffic restrictions. As noted in Response to Comment 115, as well as Appendix A of the SEA, the side streets with the greatest impacts are expected to be 12th Street, 13th Street, 15th Street and 16th Street.

**Comment 139.** The traffic analysis in the SEA does not properly account for other buses that currently operate along 14th Street. The traffic analysis is not based on real traffic counts, only on modeling. There were no traffic counts performed on side streets. (Groncki, Bond)

**Response:** As discussed in Response to Comments 114 and 115 and Appendix E of the SEA, the modeling evaluation of ASP scenarios is based on very detailed baseline modeling of streets and intersections of 14th Street and adjacent side streets. The traffic modeling was based on real data.
Comment 140. Where will handicapped parking along 14th Street be relocated? The ASP does not adequately address the needs of disabled and elderly residents within affected Manhattan neighborhoods where prohibitions on passenger vehicles would be implemented. Worried about ADA accessibility and curbside access to vehicles for disabled and elderly residents in the corridor (Michele-Curry, Rubinstein, Liff, Holtzer, P. Kahn, Lidsky)

Response: Short-term local access, including Access-a-Ride vehicles would still be allowed on 14th Street under the ASP. Long-term on-street vehicle storage cannot be accommodated on 14th Street for any purpose during the tunnel reconstruction due to the volume of bus activity detailed in the ASP.

Comment 141. Traffic on 14th Street will be impacted from Third Avenue to Avenue C. The turn lane on First Avenue will be a problem with flow of traffic, congestion will build. (Epstein)

Response: Appendix E of the SEA contains an overview of the traffic analysis conducted for the 14th Street corridor. Since through traffic across 14th Street would not be permitted under the ASP, the volume of vehicles using the turn lane on First Avenue to 14th Street would be reduced.

Comment 142. To facilitate access for 14th Street residents NYCDOT should evaluate the feasibility of right turn lanes on First Avenue and Third Avenue. (Epstein)

Response: As noted in Section 8 of the SEA, MTA NYCT and NYCDOT will monitor traffic conditions during the approximate 15-month shutdown in a dynamic and responsive manner and adjust traffic approaches to optimize performance in order to minimize impacts.

Comment 143. How will diversions from westbound 14th Street be handled? 15th Street does not look to be a viable alternative because Union Square Park breaks the street up and routing around it would be difficult. This question as it has a major bearing on the success of the project. (Schnur)

Response: See Response to Comments 114, 115, and 137, as well as Section 6.1.3.2 of the SEA.

Comment 144. Commenters stated 14th Street restrictions would turn 15th Street into a parking lot, lead to crashes, make intersections more dangerous, and stated concerns about how it would affect property values and their ability to sell an apartment. (Goldford, Gentile, Moers, Toscano, Zieher)

Response: See Response to Comments 114, 115, and 137, as well as Section 6.1.3.2 of the SEA. The temporary implementation of the ASP busway would not be a full closure of 14th Street and the traffic analysis and modeling undertaken to evaluate the best option for the ASP indicated that the proposed busway would provide the best opportunity to operate the M14 SBS with the least disruption to the side streets. Compared to the No Action Alternative, the ASP is expected to greatly improve travel time on 14th Street without substantial changes to travel times on 12th Street, 13th Street, or 15th Street.
Comment 145. 15th Street can be used as an alternate, but other streets such as 16th Street and 13th Street should be used as well. (Dowson)

Response: Comment noted. Passenger vehicles diverted off of 14th Street could use any of the side streets in the area.

Comment 146. A separate lane on 14th Street should be set aside for taxis and Uber/Lyft/Via pooling vehicles while this work goes on. If they are forced to use adjacent streets, like 13th Street and 12th Street, the congestion will be terrible and commuters who use these will be further delayed and inconvenienced. (Gruen, Hoch)

Response: Between Third Avenue and Ninth Avenue, the ASP busway would have a system of curbside lanes for deliveries and pick-up and drop-offs along 14th Street. Based on feedback from the public, the current operations plan of the ASP would allow all vehicles, including taxis and FHVs, to use 14th Street for local destinations and pick-ups. Once on 14th Street any such vehicle must use the first right-hand turn off 14th Street which would be enforced by NYPD and by NYCDOT with bus lane camera technology. To the west of Ninth Avenue and to the east of First Avenue, operations would be similar to current operating conditions. Between First Avenue and Third Avenue, there would be a mix of curbside and offset bus lanes, but all vehicles would retain the access they have currently.

Comment 147. I am a babysitter at the Vermeer Apartments on 14th Street. You are making it impossible to get to my job and help my daughter. You are creating hardships for many people who have to get to work. You are literally closing our parking entrance on 14th Street. 15th Street will now have all the car traffic from 14 Street which is packed with cars. (Galleshaw)

Response: As stated in Section 5.2.3.2, “14th Street Corridor Bus Enhancement,” of the SEA, all vehicles would continue to have local access to buildings and parking garages which front on 14th Street. 15th Street will now have all the car traffic from 14 Street which is packed with cars.

Comment 148. NYCDOT predicts a 50 percent increase in vehicular traffic volume diverted from 14th Street but does not disclose the impact of the increased traffic on the already congested side streets. Our side streets are narrow. School buses, pick-up and delivery cars and vans leave room for one lane only of through-traffic. (Howard, Patel, Soderberg, Tyrer, Hartigan)

Response: As disclosed in Section 6.1.3, “Traffic and Roadways,” of the SEA and detailed in SEA Appendix E, the vehicles diverted from 14th Street would be expected to use other routes on nearby side streets as well as other routes beyond the immediate corridor. As estimated, the closest side streets could see overall volumes change by about 30 percent in the AM peak and 50 percent in the PM peak with corresponding increases in travel time of 6 percent and 10 percent; with the greatest changes on 13th Street. There will be an increase in traffic in the No Action Alternative compared with current conditions. Compared with the No Action Alternative, the ASP would lead to increased traffic on some streets and decreased traffic on others. The addition of a curbside protected bicycle lane on one side of 13th Street would remove the parking/loading lane on that side of the street. However, the design includes a buffer that would provide sufficient...
room to allow temporary standing while other vehicles pass by. See Response to Comments 114, 115, and 137, as well as Section 6.1.3.2 of the SEA.

**Comment 149.** We are concerned about the increase in overflow traffic, increased vehicular traffic, and congestion. Concerned about grid-lock that may result from the increase in traffic, especially on the corner of Eighth Avenue and 15th Street. A 30 percent increase in traffic on one-lane residential streets will have a significant negative impact on traffic flow. The increase in vehicular traffic will result in more vehicles turning onto the avenues, stopping to yield to pedestrians, and thus creating impediments. (Community Board 4, Curtis, Dinhofer, Groncki, Harmon, Marcus, Jaffe, Tenenbaum, Tomei, Williams)

**Response:** As established in Appendix E of the SEA, the evaluation of the impacts to immediate side streets with the additional diversions from 14th Street, and compared to the No Action Alternative, show similar travel times with an overall increase of 10 percent or less. The analyses indicate that the change would not result in substantial increases in congestion. See Response to Comments 114, 115, and 137, as well as Section 6.1.3.2 of the SEA.

**Comment 150.** On page 25 of the SEA, you report the travel times for crosstown traffic. In the bottom chart, you include 15th and 16th Streets but including these streets skews the data, since both of them stop at Union Square West because of the Park. I am particularly concerned about traffic congestion on 17th Street and above, where traffic is already significantly overloaded. (Riley)

**Response:** Since crosstown traffic does not uniformly travel fully crosstown, there still would be estimated increases on 15th Street and 16th Street. As noted in Response to Comment 115, as well as Section 6.1.3.2 of the SEA the distribution of vehicles no longer able to use 14th Street would be wider than just the local streets adjacent to 14th Street. While 17th Street may see an increase in volumes (as would other side streets), no street is expected to experience incremental volumes greater than what was evaluated for the immediate side streets. See Appendix E of the SEA for further explanation as to which streets were analyzed.

**Comment 151.** The area of assessment of the impact does not cover 16th Street. It fails to acknowledge that 15th and 16th Streets are not crosstown streets. (Ryan)

**Response:** The SEA does include 16th Street in the evaluation of side street diversions and travel times. As noted in Appendix E of the SEA, the model specifically evaluates 15th and 16th Street in consideration of the interruption by Union Square Park.
Comment 152. What about traffic on the side streets in historic landmark neighborhoods around 14th Street. There will be a diversion of vehicles and trucks onto side streets. The vehicular impact of 30 percent increase in volume on the side streets (West 15th, 16th, 17th, and 18th Streets) has not been studied in detail; nor have mitigation measures been proposed, other than the deployment of NYPD agents. In the Project’s SEA, NYC DOT aggregates those streets with the others in the “corridor,” which include 14th Street and other streets to the south, and concludes that the overall vehicular movement in the corridor will improve compared to the “no action” scenario. In addition, these streets are being used illegally by trucks who detour from 14th Street. (Aronson, Community Board 4, Groncki, Pesin, Hartigan)

Response: Under the ASP, local deliveries would be allowed along 14th Street, so not all truck trips would be eliminated. Through trucks using 14th Street as a designated truck route would be diverted to an alternate truck route. Enforcement is an important community concern and a critical component of implementing and managing the ASP. As noted in Section 8 of the SEA, NYCDOT and MTA NYCT are coordinating with NYPD on truck enforcement along the corridor. In addition, there would be camera enforcement of through traffic on 14th Street to ensure the street is used for local traffic only. See Response to Comments 114, 115, and 137, as well as Section 6.1.3.2 of the SEA, which indicate that the vehicle diversions from 14th Street would be expected to utilize a wide variety of choices in terms of east-west streets further to the south and north of the immediate corridor. As a result, some of these vehicles would be as likely to be on north-south avenues as they might be on side streets in the immediate area of 14th Street and other vehicles may use other routings outside of the immediate area altogether. Therefore, the diversion of these vehicles would be widely distributed in the study area and beyond while 15th Street, 16th Street, 17th Street and 18th Street may absorb some of the diverted traffic, there would not be an incremental change large enough to alter the findings of the SEA.

Comment 153. 12th Street is too narrow for a bike lane and to handle truck traffic. Greenwich Village is one of the oldest historic neighborhoods of New York—please do not destroy it. (Jezzini)

Response: The temporary bicycle lane would be based on standard specifications and would occupy the curbside lane now used for parking. It would not affect the travel lanes and would not impact the street’s capacity. The State Historic Preservation Office (SHPO) found a finding of No Effect for the ASP on local historic resources (see Section 6.5, “Historic, Cultural, and Archaeological Resources,” of the SEA).

Comment 154. Traffic will also end up on 15th Street. It is a very narrow street, filled with apartment buildings, small businesses, schools and all sorts of important medical facilities. Mount Sinai has a cancer facility on 15th Street. Very ill people go there for their chemo and radiation treatments. People who are weak, some terminal. If they are sitting in a cab, waiting to get to their chemo, and it's taking forever because of traffic backups on both streets, that will be a hardship for them. And, some cancer patients receiving chemo are weak, so forcing them to walk several blocks because of this plan of yours, represents a great hardship for them. (Llewellyn)

Response: As presented in SEA Appendix E, travel times along 15th Street would be less than one minute longer with the ASP in comparison with the No Action Alternative.
Comment 155. I am very concerned that accessing my garage on 14th Street will become more than difficult. Will the Police be hassling the few car drivers allegedly allowed on 14th Street and how long will I be able to drive on 14th if I want to go to the Westside Highway for example? Will I be forced to get off at the next street? Extremely difficult access for the many residents who live on 14th Street or have garages only accessible to 14th Street. Will garbage be picked up and deliveries made at night? This does not account for the 14th Street Coalition's plan. It, in fact, just ignores a vast swath of residences and businesses that actually have to be in the neighborhood. (Berkowitz, Carlin, D. Duerr, O. Duerr, Goldford, McCarthy, Michel, Ng, Strider, P. Kahn, Cohen, Sacks)

Response: As described in Section 5.2.3.2, “14th Street Corridor Bus Enhancement,” of the ASP, short-term local access (including to garages on 14th Street) and local deliveries for all vehicles would be allowed on 14th Street under the ASP. However, after drop-off, pick-up, or delivery is made on the street, vehicles would have to turn off of 14th Street at the next available right-turn intersection. Private vehicles would not be allowed to drive across the entire street. There would be dedicated loading zones throughout the 14th Street corridor to allow for local access for all vehicles.

Comment 156. I do not see any consideration of the businesses on 14th Street, who will undoubtedly lose business, as they did during the construction of the Second Avenue subway. They will need deliveries to maintain their businesses—how will that be handled? The report states that stores will have “limited” access for deliveries—many businesses may be close to failure if they cannot have deliveries as-needed. You will be hurting a lot of small business owners. (Riley, Carlin, Bellino, P. Kahn, Markovitz, Cohen, Harvey)

Response: Local deliveries would still be allowed along 14th Street under the ASP. Locations for loading and unloading of delivery vehicles would be restricted and carefully enforced. Pedestrians would still have access to businesses along 14th Street. The additional pedestrian space would enhance mobility benefitting existing businesses with easier access to customers. The construction associated with the ASP is short-term in duration—less than 6 months—and minor. The ASP would be supportive of existing land uses along the project corridor by providing alternative transit options to and within the affected neighborhoods. It does not involve tunneling or cut and cover work that was associated with the Second Avenue Subway project.

Comment 157. There is a school located on 13th Street between Sixth and Seventh Avenues. The children will be exposed to additional bike, car and truck traffic making the street unsafe for young children. (Demas)

Response: With the exception of the removal of parking from one side of the street and its replacement with a five-foot-wide bicycle lane and three-foot-wide buffer, there would be no physical changes proposed to 13th Street. There are numerous other locations within New York City where this type of street configuration exists adjacent to schools.

Comment 158. The closure of Union Square West will force all vehicles descending on Broadway to turn west on 17th Street, adding traffic to the street. (Ryan)

Response: MTA NYCT will ensure that NYCDOT installs appropriate signage informing drivers of new traffic patterns in advance of the start of the tunnel closure. SEA Appendix E shows that travel times on 17th Street would increase by a small percentage.
Comment 159. I am also concerned whether there has been any consideration for snow and snow removal issues in addition to emergency vehicles, paratransit and user needs, accessible sidewalks and curbs and pedestrian safety. (Wortman, Strider)

Response: MTA NYCT and NYCDOT have considered the needs for snow removal, accessibility and safety, and emergency access into the design of proposed ASP enhancements. MTA NYCT and NYCDOT would coordinate with the Department of Sanitation and local BIDs on facilitating snow removal.

Comment 160. Changes such as only nighttime deliveries are being ignored because of the potential negative impact on business. (Groncki)

Response: In consideration to concerns from local businesses, daytime deliveries would be allowed in dedicated loading zones along 14th Street under the ASP. Vehicles would only be allowed to access 14th Street for local deliveries, and would have to turn off of 14th Street at the next available right-turn intersection.

Comment 161. Get local businesses large and small (both on 14th Street, and neighboring avenues) heavily enrolled and participating in DOT's highly-successful nighttime freight-delivery program—long before the shutdown begins. (Scheyer)

Response: Since daytime deliveries would be allowed, MTA NYCT and NYCDOT will evaluate the need for nighttime freight-delivery program after evaluating the implementation of the ASP.

Comment 162. I am concerned that the traffic plan proposed to be adopted will make curb-side pickup and drop-offs very difficult. I am certain that many other elderly residents on 13th Street will be affected and will suffer dire consequences unless changes are made to accommodate the needs of persons who have very limited ambulatory ability. (Brickman, Hoch)

Response: The addition of a curbside protected bicycle lane on one side of 13th Street would remove the parking/loading lane on that side of the street. However, if someone illegally double-parks adjacent to the bicycle lane, there is sufficient street space to allow other vehicles to pass, as there is when vehicles double-park under existing conditions.

Comment 163. I am especially troubled that the closure of 14th Street has been scheduled to start on January 6, 2019, three months prior to the actual L train shutdown. (Charleston, Glassman)

Response: Roadway modifications for the ASP would already be in place by January 2019 as they must be completed in Fall 2018, during warmer weather, to be ready for the April 2019 tunnel closure. Implementation of the M14 SBS bus service along 14th Street is being considered to start in April 2019 once all associated improvements (e.g., roadway striping and temporary sidewalk extensions) to 14th Street have been made to allow MTA NYCT to provide faster and more convenient service to riders prior to the start of the closure.
**Comment 164.** We encourage the implementation of loading zones along these side streets with restricted delivery hours and camera enforcement. (Community Board 4)

**Response:** As noted in Section 8 of the SEA, MTA NYCT and NYCDOT will monitor traffic conditions during the approximate 15-month shutdown in a dynamic and responsive manner and make adjustments to optimize performance in order to minimize impacts.

**Comment 165.** 14th Street needs to favor bus/pedestrian/bicycle use. I worry about the traffic tangle which would be directly caused by continued private-use cars on 14th Street during the L’s absence. The key to keeping 14th Street functioning as a major crosstown thoroughfare during this interim is to promote public transit and demote private car use. (Banchefsky, Metalios, Akhmetov, Scheyer)

**Response:** Comment noted. The ASP will prioritize bus, pedestrian, and bicycle use.

**Comment 166.** Please do not close 14th Street to auto traffic with the upcoming subway repairs. The side streets are already too congested. The plan to close 14th Street to all but buses and emergency vehicles is abusive. I am outraged by the callous disregard for the neighborhood, and the people who live and work there. (Cerrone, Feldman, Harmon, McCue, Schlesinger, Bellino, Bender, Cohen, Collins, Davis, Tomei, Whitman, Jensen, Mulkins, Dennett, Diamond, P. Kahn, Skurnik)

**Response:** As described in Section 5.2.3.2, “14th Street Corridor Bus Enhancement,” of the ASP, limited local automobile and delivery access to 14th Street would be permitted under the ASP. Mobility for people who work in the neighborhoods would be significantly greater under the ASP as compared to the No Action Alternative. Note that virtually all users of the busway would live, work, shop, or be visiting the neighborhood, and would not simply be passing through. As shown in Appendix E of the SEA, busway users would outnumber auto users by a factor of 10. Similarly, the busway would enable pedestrian improvements to accommodate increased pedestrian flows. Most pedestrians are the people who work, live, shop, and visit the neighborhood, far outnumbering people in autos.

**Comment 167.** Why not close 14th Street to traffic other than buses and emergency vehicles from 6:30-8:30 AM and 5:30-7:30 PM? (Troup)

**Response:** Peak crosstown traffic is longer than traditional peak commuting hours. NYCDOT looked at various hours and types of restrictions as part of the development of the ASP. The chosen option, with local access preserved during these times, balances the need for a robust and fast bus service while incorporating the need of local residents and businesses to maintain access.
Comment 168.  I am upset over the MTA/DOT plans to ban cars and trucks on 14th Street. All the traffic will be diverted to the neighborhood streets but especially to 20th Street since it is the easiest way to get access across Manhattan between Houston and 23rd street. It is more likely that traffic will principally be rerouted and create congestion starting at 17th Street through to 22nd Street (but they are not mentioned in report). The MTA provides no statistics whatsoever to substantiate its “prediction” that side streets north of 16th Street will have a minimal increase in traffic. The streets just north of 14th Street are blocked by Union Square (15th & 16th Streets), by Stuyvesant Town (15th to 19th Streets), and by Peter Cooper Village (21st & 22nd Streets). Streets south of 14th Street run through the already congested Greenwich and East Village and do not provide direct connections to either West Street or the FDR Drive until you get down to Houston Street. We are concerned about 18th Street not being included in studies to assess traffic impacts around Union Square and its residual effect on 18th Street. (Aronson, Avneri, Brooks, Errera, Finley, Harmon, J. Klein, Riley, Ryan, Schwartz, Tyrer)

Response: See Response to Comments 114, 115, and 137 as well as Section 6.1.3.2 of the SEA.

Comment 169.  Chelsea’s residential side streets are not built for major thru traffic by trucks. There is also a large contingency of elderly people who reside in the neighborhood whose safety will be compromised by the additional redistribution of traffic to side streets. (Gonzalez)

Response: Through truck traffic would still have to follow designated truck routes, except to make local deliveries. As noted in Section 8 of the SEA, NYCDOT and MTA NYCT are coordinating with NYPD on truck enforcement along the corridor.

Comment 170.  We are concerned about traffic generated from the Uber/service vehicles collecting throughout area. The frequency of M14A and M14D local buses is not being beefed-up, as it should be with the predictable result of a significant diversion of ridership to “for-hire vehicles”. If these operators are permitted to ply their business on 14th Street, flouting “no parking,” “no standing” and “no stopping” traffic regulations—resulting inferior bus operations will drive passengers off mass transit and further increase demand for door-to-door for-hire vehicle trips. Decrease or ban all Ubers down Fifth Avenue and allow pickups only on Sixth Avenue. (Curtis, Foldi, Scheyer)

Response: M14 SBS service would supplement M14A and D service under the ASP. Overall frequency of 14th Street bus service would be significantly increased. The proposed busway with robust priority is needed to ensure fast travel times and reduced congestion. FHVs would still be allowed on 14th Street provided they are making local drop-offs and pick-ups and turn off of 14th Street at the next available right-turn intersection. The ASP would result in a net reduction of FHVs along 14th Street compared with the No Action Alternative due to the faster bus travel times, making the bus a more attractive service.
Comment 171. Traffic that is diverted off Fifth Avenue is going to be funneled onto 15th Street or other one way side streets heading west. There should be no trucks down Fifth Avenue below 23rd Street except for garbage trucks. These streets cannot accommodate that volume. There is no mention of plans to avoid massive traffic congestion on West 15th Street. (Foldi, Markowitz)

Response: Through truck traffic would still have to follow designated truck routes, except to make local deliveries. As noted in Section 8 of the SEA, NYCDOT and MTA NYCT are coordinating with NYPD on truck enforcement along the corridor.

Comment 172. MTA/DOT drawings clearly show NO TRUCKS will be able to stand on our side of 14th Street between Fifth Avenue and Sixth Avenue. This would cause trucks to circle the block. (Ingall, Feinn)

Response: In response to community input, dedicated loading space has been integrated into the busway design along every block requiring direct 14th Street access that does not have loading from an avenue or a side street.

EMERGENCY SERVICE ACCESS

Comment 173. The SEA does not adequately address the effect of the ASP on emergency service within affected neighborhoods. How will emergency service vehicles be able to respond on 14th Street and on side streets? With just a single lane of traffic flowing mid-block in each direction on the 14th Street busway, how will emergency vehicles pass the buses? (Galleshaw, Pesin, P. Kahn, Skurnik)

Response: As noted in Section 5.2.3.2, “14th Street Corridor Bus Enhancement,” of the SEA, implementation of the temporary busway along 14th Street would “restrict through traffic to buses, and emergency vehicles.” As shown in Figures D-4 through D-11 (Appendix D) of the SEA, the busway would provide a combination of two vehicular lanes plus a curb-side loading area and three vehicular lanes in areas adjacent to SBS stops to allow for buses to bypass one another and emergency service vehicles to bypass buses. This combination of vehicular lanes, loading areas, and expanded pedestrian zones along with a net reduction in overall traffic volume along 14th Street (through prohibitions on other traffic) would provide sufficient room for all modes of travel within the corridor. Emergency service vehicles would also run counter-flow (i.e., within the on-coming lane) if necessary to bypass congested conditions. On side streets and avenues, the same regulations as currently apply would continue to apply relating to yielding to emergency service vehicles.

Comment 174. We are concerned about emergency vehicle accessibility and flow along 14th Street. Emergency vehicle access will be impeded. The Project’s SEA must take into account the urgent need for through access for emergency vehicles. (Aronson, Berkowitz, Community Board 4, Gelb, Harmon, J. Klein, Marcus, McCarthy, Pesin, Schwartz, Bellino, Davis, Tomei, Williams, Feinn)

Response: See Response to Comment 173, as well as Section 5.2.3.2 of the SEA.
Comment 175. We need two lanes for moving traffic on 13th Street so that traffic does not get backed up by delivery trucks, emergency vehicles (we have waiting ambulances here), loading and unloading of cars temporarily stopped. (D. Duerr, O. Duerr)

Response: As described in Section 5.2.5, “Bicycles,” of the SEA, the proposed ASP would include a temporary bicycle lane on 13th Street by removing parking on one side of the street. All existing vehicle through lanes would remain and the temporary bicycle lane would not impede capacity or operation of the street.

Comment 176. Congestion will hamper ability of emergency vehicles, like ambulances and fire trucks. How is an ambulance to get from urgent care center on Seventh Avenue to a hospital, if someone is having a heart attack? Has this been considered in your study? And what conclusions have been drawn? Chelsea already experiences a dearth of immediate access to major medical facilities since the demise of St. Vincent’s hospital. It is unconscionable to compromise the community any further in this way. (Gonzalez, Demas, Edwards, Howard, Riley, Troup, D. Duerr, O. Duerr, Finley, McCue, Cohen, J. Greenhaus)

Response: See Response to Comment 173, as well as Section 5.2.3.2 of the SEA.

Comment 177. How will fire trucks and ambulances navigate 14th Street and surrounding side streets from the fire house at the corner of 19th Street and Seventh Avenue and on 14th Street and Second Avenue? (Harmon, Flynn, S. Greenhaus, Jacques, Ingall, Jezzini, Whitman)

Response: FDNY’s Engine 3/Tower Ladder 12/Battalion 7 is located just east of Seventh Avenue on 19th Street. 19th Street is one-way westbound and Seventh Avenue is one-way southbound. Emergency vehicles exiting the fire house would proceed west on 19th Street and south on Seventh Avenue to reach 18th Street. Emergency vehicles would be able to travel along 19th Street and 18th Street under free-flow and congested conditions assuming compliance with existing traffic regulations for all vehicles to yield to emergency service vehicles with flashing lights.

Comment 178. I am relieved that emergency vehicles will be allowed on 14th Street as I don’t think they would be able to get across on 15th Street. (Curtis)

Response: Comment noted.

Comment 179. Only use 14th Street for emergency vehicles and full cars with passengers. (Metalios)

Response: Emergency vehicles would be able to use 14th Street. Passenger cars would be able to make local drop-offs/pick-ups or access parking garages (regardless of occupancy). However, passenger vehicles would have to turn off of 14th Street at the next available right-turn intersection.
ENFORCEMENT

Comment 180. How would the HOV lanes be enforced and how they will access other bridges and tunnels? (Davies, Lawrence, Loeb, Yamada, Boursier, Sholl, Hales, Kneidl)

Response: NYCDOT and MTA NYCT are working with NYPD to ensure that there would be proactive enforcement along the corridor. Additionally, there would be traffic cameras on 14th Street in order to enforce the busway restrictions.

Comment 181. There should be automated enforcement cameras to uphold the busway and deter private cars and for the high-occupancy vehicle (HOV3+) regulations. (Asher, Keller, Lunceford-Stevens, Clausen, Rothman, Kneidl, Schwartz)

Response: NYCDOT and MTA NYCT are working with NYPD to ensure that there would be proactive enforcement along the corridor. Additionally, there would be traffic cameras on 14th Street in order to enforce the busway restrictions.

Comment 182. Congestion on the side streets continues to be of utmost concern to the community, especially illegal truck traffic that has been plaguing the streets north of 14th Street for years. There is no enforcement of trucks or traffic violations on side streets and throughout the area. The no-truck signs throughout the area are ignored and these streets are being used illegally by trucks who detour from 14th Street. In spite of repeated requests, this condition has never been properly enforced by NYPD. We request that DOT ensure that all these streets have signage indicating “No Through Truck Traffic/Local Deliveries Only.” How would the ASP, which relies on enhanced enforcement, succeed where current enforcement fails? (Aronson, Community Board 4, Charleston, Gelb, Groncki, Cohen, Hartigan)

Response: As noted in Section 8 of the SEA, NYCDOT and MTA NYCT are coordinating with NYPD on truck enforcement along the corridor. Additionally, there would be traffic cameras on 14th Street in order to enforce the busway restrictions.

Comment 183. Please hire people to enforce all routes. Not one patrol car every 10 blocks but actual people on foot, aggressively enforcing traffic rules – especially rush hour but not limited to it. Consider a station/booth in the center of traffic on the bridge midway, reporting the flow, problems, issues, etc. Without enforcement it will fail miserably. (Davison)

Response: NYCDOT and MTA NYCT are working with NYPD to ensure that there would be proactive enforcement along the corridor. Additionally, there would be traffic cameras on 14th Street in order to enforce the busway restrictions.
Comment 184. You propose a “shared street” model for University Place. I would also add new stop lights for bikes and a way to ensure that pedestrians are protected. Bikers do not respect stop lights or people (whereas cars do, making them safer than bikes) and injuries and stressful experiences continue to happen. This is a part of a bigger problem, but I would study a way to enforce these safety rules for pedestrians and bikers—if bikes skip stop signs and stop lights and put others in danger, find a way to give them a ticket, a sanction, or stop them in the moment—the way you would any other type of moving vehicle in a city! (de Riva)

Response: As noted in Section 8 of the SEA, MTA NYCT and NYCDOT will monitor traffic conditions during the approximate 15-month shutdown in a dynamic and responsive manner and make adjustments to optimize performance in order to minimize impacts.

Comment 185. What is the cost for the additional police monitoring of traffic, bicycles and vendors? (Strider)

Response: Costs for additional police monitoring have not been determined. As noted in Section 8 of the SEA, NYCDOT and MTA NYCT are coordinating with NYPD on truck enforcement along the corridor.

Comment 186. Commenters expressed concern for the lack of planning for enforcement, overseeing, and monitoring of vehicular and bicycle traffic on 14th Street and nearby side streets that will be impacted by the changes (DOT predictions of 50 percent increase in vehicular volume diverted from 14th Street leading to traffic jams on already congested side streets). NYPD cannot currently enforce anything, it will only get worse. (Groncki, McCue, Riley, Tyere, Wortman, Liff)

Response: NYCDOT and MTA NYCT are working with NYPD to ensure that there would be proactive enforcement along the corridor. Additionally, there would be traffic cameras on 14th Street in order to enforce the busway restrictions.

Comment 187. MTA and DOT should utilize strategies like stationing tow-trucks at strategic points to clear-up any blockages as soon as they occur. (Scheyer)

Response: MTA NYCT and NYCDOT are working together and with other stakeholders to develop protocols to respond to incidents.

Comment 188. If a bus comes to a halt, or is unable to discharge passengers at curbside due to the action of one of these for-hire vehicle operators, NYPD should consider citing those operators for a moving violation. There can be policy-driven exceptions: for example, for pick-up and drop-offs at the entrance to Manhattan Eye and Ear Infirmary by Access-a-Ride van patrons—and for persons enrolled with the MTA’s new Access-a-Ride ride-hailing app—but, these vehicles cannot be allowed to hang around, waiting, on East 14th Street. For taxi or for-hire vehicle drivers who are stopped by a police officer on 14th Street, he/she can display a hand-held device app showing that driver’s actually on an MTA Access-a-Ride app call. (Scheyer, Cohen)

Response: MTA NYCT and NYCDOT are working together and with other stakeholders to develop protocols to respond to incidents.
Comment 189. Private car owners with NYC Department of Finance (NYCDOF) parking tax exemptions issued for certain 14th Street garages can be permitted to enter/leave their own parking garage—as their license plate numbers are readily identifiable in the NYCDOF's database. Also, a vehicle operator also can carry in the vehicle a paper copy the NYCDOF exemption certificate to show to a traffic enforcement agent. (Scheyer)

Response: Operators of private cars would be able to access the parking garages on 14th Street under the ASP, but they would not be able to use 14th Street as a through-street.

Comment 190. We also hope the SEA can evaluate the impact that reversing traffic direction north of 14th Street between Sixth Avenue to Seventh Avenue and between Eighth Avenue to Ninth Avenue would have in preventing these narrow, largely residential streets from being used as thru streets and reducing traffic congestion. (Johnson, Hoylman, Gottfried, Glick, Rivera, Powers)

Response: NYCDOT has evaluated reversing traffic direction and has presented it to community boards as part of the ASP outreach. Based on the anticipated change in diverted trips from 14th Street to side streets, and the comparison of travel times and overall person-hours of delay between the ASP and the No Action Alternative, a change of street direction as noted in the comment was not deemed a beneficial treatment for optimizing side street operations during tunnel closure. This operation would create head-on conditions at intersections requiring vehicles to make turns on to the avenues at the point of the direction change, conflicting with heavy pedestrian volumes crossing the avenues.

Comment 191. Please provide traffic camera monitors along Kenmare Street, at Bowery/Kenmare, Cleveland/Kenmare, and Broome/Lafayette. (Tenenbaum)

Response: NYCDOT’s Traffic Management Center maintains traffic monitoring cameras for critical traffic locations throughout the City. During the L train tunnel reconstruction, NYCDOT anticipates adding and/or relocating cameras to a large number of locations within the ASP zone. NYCDOT is in the process of developing a list of traffic monitoring camera locations for the approximate 15-month shutdown. As noted in Section 8 of the SEA, MTA NYCT and NYCDOT will monitor traffic conditions during the approximate 15-month shutdown in a dynamic and responsive manner and make adjustments to optimize performance in order to minimize impacts.
FERRIES

Comment 192. The MTA is providing a ferry—but, apparently hoping to make it so inconvenient it attracts few riders for the ferry going to/from Williamsburg. The normal walk-up catchment area for a NYC Ferry landing is ¼ mile, so MTA leaves us here with a longer, uphill climb on foot from the North Williamsburg ferry landing to Bedford Avenue. I’ve previously suggested a means to MTA of lessening this impact on the Williamsburg businesses that are going to get “creamed” by the shutdown: run a circulator bus on N. 4th & N. 5th Streets from the business district (Bedford Avenue/Driggs Avenue) to the ferry via a short, continuous circular route down to Kent Street (or the parallel local street inside the Edge waterfront development). Without this, when the weather gets bad, I predict Uber – with surge-pricing, and others, will rush-in to fill the void, utterly jamming-up the narrow local streets of Williamsburg. (Scheyer)

Response: It is a distance of 0.4 mile from the North Williamsburg ferry terminal to Bedford Avenue. There is a modest grade change of approximately 20 feet over 1,800 feet (an approximately 1.1 percent grade). The purpose of the temporary ferry service under the ASP is to serve those commuters that live near the waterfront that are not easily served by subway service. A large number of residents currently walk to the ferry terminal to use the existing service. It is expected that those further from the ferry terminal would take a subway or bus rather than add a shuttle or FHV leg to their journey. Analysis shows that such a bus would be poorly utilized as it would be not much faster than walking.

Comment 193. During rush hours, more than 1,200 people will opt to use the ferries and more ferry service will be required at rush hour. (Maloney)

Response: MTA NYCT demand estimates indicate that the temporary proposed ferry service would reasonably accommodate the anticipated demand with an estimated utilization of 77 percent of capacity (AM peak).

Comment 194. The proposal would benefit from an immediate increase in ferry service. An estimated 5 percent of L train riders are expected to use ferry service during the shutdown, but I believe we should strive for a greater number than that. To reach that goal we should add more ferries now and preferably as many as possible to help relieve the strain that will be placed on the subways and buses. (Lentol)

Response: The proposed temporary ferry service must be compatible with the existing ferry service in the East River that continues to expand. Both the North Williamsburg ferry landing and the Stuyvesant Cove ferry landing serve (or will serve) other ferry service that cannot be interrupted. As described in Section 5.2.4, “Ferry,” of the SEA, the proposed service frequency is based on the availability of slots at the two ferry landings and the ability to integrate with existing and planned future ferry service. The ferries would have a minimum capacity of 149 passengers, consistent with NYC Economic Development Corporation’s (NYCEDC) existing fleet, and would have the physical dimensions and operational capabilities to meet requirements of the route. In addition, the ferry boats would use existing navigational channels in the East River and operations must address any maritime safety concerns raised by the New York Harbor Operations Committee. It is not anticipated that new or expanded NYC Ferry Service
would be required. However, MTA NYCT and NYCEDC would monitor ridership and would attempt to address loading issues if they arise.

**Comment 195.** Expand the capacity of the highly successful NYC Ferry Service to include a route between Brooklyn and the West Side Pier 57, which would alleviate the pressure on the replacement bus system. (Community Board 4)

**Response:** The temporary ASP ferry service would include only the Stuyvesant Cove to North Williamsburg route. It is not anticipated that new or expanded NYC Ferry Service would be required. Ferry service from Brooklyn to the west side of Manhattan would not be time-competitive compared to other travel options. However, MTA NYCT and NYCEDC would monitor ridership and would attempt to address loading issues if they arise.

**Comment 196.** The MTA should work with the New York City Economic Development Corporation (EDC) to explore using the much larger ferry boats with an expanding number of seats from the current 149 seats to add more capacity. EDC should also work with the MTA to identify if free transfers between modes could be included as part of the mitigation efforts. (Adams)

**Response:** On short routes, there is a balance between vessel size and vessel frequency. Larger boats have longer loading times and, therefore, less frequency. Smaller boats running more frequently are more desirable. For the temporary ASP ferry service, ensuring the availability and operability of ferry boats is essential; therefore, the specifications were designed to be compatible with current NYC ferry operations. The ferries would have a minimum capacity of 149 passengers. MTA NYCT modeling indicates that the temporary proposed ferry service would reasonably accommodate the anticipated demand with an estimated utilization of 77 percent of capacity. As noted above, MTA NYCT and NYCEDC would monitor ridership and would attempt to address loading issues if they arise. There would be free transfers between the proposed ASP modes and other MTA buses and subways (but not with the NYC Ferries).

**Comment 197.** Is there a petition for residents who live in Canarsie to have a ferry service at Canarsie Pier to and from Manhattan? (Francois)

**Response:** Ferry service from Canarsie to Manhattan is not time-competitive with other travel alternatives. However, MTA NYCT acknowledges that there have been requests from the community in Canarsie to provide more robust service to affected riders in this neighborhood during the project. MTA NYCT therefore is planning to add another bus route enhancement to the ASP. This route—the L5 (see figure)—would connect Canarsie with the 3 and 4 trains at Crown Heights-Utica Av for additional subway service into Manhattan. This route would operate as a peak hour service overlaying the existing B42 bus route and the northern half of the B17 bus route, bringing Canarsie customers to the ADA-accessible 3/4 Crown Heights-Utica Av station. This route would provide an alternate service option for customers living in the Canarsie neighborhood of Brooklyn who have expressed concerns about having to make the subway transfers at A/C/J/L/Z Broadway Junction during the L train tunnel shutdown.
Comment 198. Run a circulator bus on North 4th and North 5th Streets from the business district (Bedford Avenue/Driggs Avenue) to the ferry via a short, continuous circular route down to Kent Street (or the parallel local street inside the Edge waterfront development). (Scheyer)

Response: This short route would not be considered attractive to walkers as the marginal time difference between the bus and walking would be very small.

Comment 199. Pedicabs to support rapid ferry access around both dock space by reputable services such as Revolution Rickshaws would enhance temporary services needed during this challenging period. The pedicabs can be branded to indicate clearly their MTA support services imperative. With new full legalization of class 1 motor assist systems for bikes, pedicabs not-for-hire can take advantage of this new status as well. (Zuman)

Response: Comment noted. MTA NYCT policy does not allow for support of third party transportation services.

Comment 200. More ferries could be used to take commuters to 23rd Street or even further toward midtown rather than bringing them over the bridge to 14th Street. (Chris Johnson)

Response: Based on the ability to provide transit options that facilitate L train riders with the least amount of additional travel time, the temporary ASP ferry service includes only the Stuyvesant Cove to North Williamsburg route. This route does connect with the M23 SBS which runs along 23rd Street.

Comment 201. In addition to the street treatments prescribed by NYCDOT, ferry staff or NYPD crossing guards should be on hand to help safely direct disembarking ferry passengers who wish to board the expanded M14 SBS and must cross the East River Greenway bicycle and pedestrian pathway to reach the temporary bus terminal. (Epstein)

Response: There would be clearly marked crossing of the temporary path to the bus terminal where it crosses the bicycle lane.
PEDESTRIANS

Comment 202. In the Union Square area, there will be immediate pedestrian impacts and we are concerned about the increase in pedestrian traffic. The private bike racks should be removed and trucks should be removed. There should be an expanded effort to reduce sidewalk sheds to the surrounding area. (Boursier, Community Board 4, Dinhofer, Hales, Robinson, Sholl, Tenenbaum, Perich, Kneidl)

Response: The ASP would include a significant increase in pedestrian space in the Union Square area. As noted in Section 8 of the SEA, MTA NYCT and NYCDOT will monitor traffic conditions during the approximate 15-month shutdown in a dynamic and responsive manner and make adjustments to optimize performance in order to minimize impacts.

Comment 203. Acting on one of the proposed items of the 14th Street Coalition, we ask you to coordinate with our elected officials to develop a strategy to relocate sidewalk vendors off of 14th Street during the shutdown. We will engage vendors in seeking alternative locations—acknowledging that some have the Street Vendor License issued mainly to veterans—so that they can continue to pursue a living while easing the anticipated pedestrian congestion on the corridor. Section 20-465(k) of the NYC Administrative Code explicitly contemplates such issues. Street vendors who block sidewalks cannot be moved because of their rights to conduct business—what about the rights of the commuters and residents? Why do the rights of businesses take precedence over our rights? (Community Board 4, Groncki, Wortman)

Response: These wider strategies regarding street vendors are beyond the scope of the evaluation of temporary ASP implementation. Also, see Response to Comment 46.

Comment 204. There’s no need to widen the 14th Street sidewalk since most of the people who took the L train will take buses instead of walking. Please consider 14th Street Coalition advice. The sidewalks are already wide enough and during intense heat and winter ice and snow there will not be thousands of commuters walking to work. If the sidewalk space is increased, some people will walk more, but what about the elderly, handicapped, young children and people who can’t or don’t want to walk? Some people need to be picked up directly by the door. We are concerned about the safety hazards resulting from the expansion of the sidewalk but also about the narrow sidewalk on the north side of 14th Street as well. (Berkowitz, D. Duerr, O. Duerr, Fox, Goldford, B. Klein, Mulhauser, Reynolds, Tralongo, Troup, Wortman, Cohen, Holtzer)

Response: Pedestrian traffic along 14th Street is anticipated to increase under the proposed ASP. Wider sidewalks in key locations would help to ease any sidewalk congestion and improve pedestrian safety. There will be increased pedestrian traffic as people who would normally take the L train will walk across 14th Street. For example, many riders are expected to divert to the M train, and someone who works at Union Square would have the option of taking the bus two blocks or walking. Local vehicle access to 14th Street would still be allowed and there would be dedicated loading zones. Vehicles would have to turn off of 14th Street at the next available right-turn intersection.
Comment 205. I am concerned about my safety crossing the Bowery, crossing Kenmare Street, crossing Lafayette Street as I navigate by foot in the neighborhood where I live and do my shopping. Vehicles blocking the box at intersections is a major hazard to seniors on foot crossing a street. (Wright, Tenenbaum)

Response: Per Section 5.2.3.1, “Temporary Interborough Bus Service,” of the SEA, temporary bus priority treatments would be installed along Kenmare Street to support the interborough bus services. These temporary treatments may include roadway resurfacing, painted pedestrian spaces, red painted bus lanes, roadway markings, bus stop curb extensions and changes to street direction. This would also help with intersection safety for pedestrians.

Comment 206. Just look at the inexcusable horror taking place in the Times Square area since traffic has been removed & replaced by the terrible loitering & dangerous element that it continues to attract. (Patton)

Response: NYCDOT has successfully transitioned and re-purposed the use of public streets at many locations to accommodate pedestrians and bicycles. At Union Square, there is a long tradition of enhanced pedestrian uses such as the farmers market. The proposed temporary measures for the ASP would allow for greater pedestrian circulation along 14th Street and would enhance pedestrian and bicycle movements along Union Square West but would not otherwise dramatically change how the park and its adjacent streets would be utilized.

Comment 207. Prohibit demonstrations and vendors from the Union Square area. (Feldman)

Response: Union Square is historically a place of civic gathering, with a dense pattern of pedestrian and transit interface. As summarized in SEA Section 6.5, “Historic, Cultural, and Archeological Resources,” public gatherings and demonstrations are, in fact, part of the history of Union Square and a part of the determination of the site’s landmark status. SHPO has determined that the temporary changes to be implemented with the ASP would have No Effect on the historic resource and it is anticipated that this would include the continued ability to use Union Square as a gathering spot. Also, see Response to Comment 46. Overall, the ASP measures are expected to provide more space and flexibility to accommodate all uses at Union Square including vendors and demonstrations.
**BICYCLES**

**Comment 208.** All bike lanes should be fully protected from automobile traffic. It is important that the safety tools and best practices be put into use by the MTA and NYC DOT in implementing protected bike lanes to avoid unnecessary conflicts between bike riders and illegally parked vehicles. Federal, State, and NYC governmental agencies also play a vital role in mutual cooperation in ensuring that they do not obstruct any bike/bus lanes or bus stops by abusing their parking privileges. (Gerber)

**Response:** The proposed bicycle lanes would utilize NYCDOT standards and guidelines in terms of pavement treatment and width, including buffer area between the bicycle lane and the adjacent traffic lanes. NYCDOT would manage the bicycle lanes during the ASP implementation period to optimize performance and prevent the use of the curbside lane for other purposes. NYCDOT and MTA NYCT are working with NYPD to ensure that there will be proactive enforcement along the corridor.

**Comment 209.** Adding bicycle lanes to 12th Street and 13th Street just when traffic is likely to double is the height of short-sightedness. If additional crosstown bicycle lanes are needed, they should be placed as far as possible from the streets that are expected to pick up the diverted vehicular traffic from 14th Street. A wiser use of the current parking lane would be to create an additional traffic lane and a place for all the current double parked trucks to pull over for deliveries. (Paston)

**Response:** It is anticipated that during the L train closure, use of bicycles along the 14th Street corridor would increase substantially and facilitating that mode shift would allow for an opportunity to avoid new vehicle trips that would further add to local street volumes. The closer the bicycle lanes are to the corridor, the better the opportunity to retain the 14th Street connections that are important to diverted L train riders. The traffic diverted from 14th Street would be expected to use any of the side streets in close proximity north and south of 14th Street and through trucks would find alternate designated truck routes outside of the immediate corridor.

**Comment 210.** There should be more protected bike lanes in both directions on Grand Street, Berry Street, and two-way bikeway on South 5th Street in Brooklyn as well as 12th and 13th streets in Manhattan. (Edwards, Kneidl, Keller, Lunceford-Stevens, Clausen, Rothman, Asher, Sholl, Aldridge, Hernandez)

**Response:** NYCDOT is proposing to add a demarcated buffer space as part of the Grand Street bicycle lanes. The 12th Street and 13th Street bicycle lanes would have flexible delineators and a demarcated buffer. South 5th Street is already two-way near the Williamsburg Bridge between South 4th Place and Driggs Avenue. The one-way bicycle lanes on 12th Street and 13th Street are in response to the anticipated increase in bicycle mode share during the L train closure and would extend fully from Avenue C to Greenwich Street. In Brooklyn, the enhancements to bicycle infrastructure would be aligned to improve usability of bicycle options for L train riders. However, more expansive and permanent changes are not considered a direct ASP measure and are not evaluated in the SEA.
Comment 211. The proposed temporary bike infrastructure should be permanent bike infrastructure. It is great that you are entering this 15-month period with the expectation that cyclist traffic will more than double. It would be better to find a way to keep cyclist traffic at that level permanently. (Nowakowski)

Response: Comment noted. As described in Section 8 of the SEA, all temporary ASP elements (including the bicycles lanes) would be removed following the 15-month construction period, unless additional planning, agency coordination, public outreach, and/or appropriate environmental analysis is undertaken as part of a permanent separate strategy.

Comment 212. We support the 14th Street Coalition. As a business owner on 13th Street, the shutdown of 14th Street as well as the proposed bike-lanes would not only be incredibly detrimental to our business but also a safety liability. Our store-front, as has been since the 1970s, used as a facility by which my various vans/trucks come to reload and unload material. Putting a bike lane on 13th Street, would not only be dangerous to my men but also to the bikers. (Teich)

Response: Per Section 5.2.5, “Bicycles,” of the SEA, the addition of the temporary bicycle lanes along 12th Street and 13th Street would provide a safer crosstown bicycle path and would not impede operation of the street. There are curbside protected bicycle lanes on several streets in Manhattan, including commercial avenues with extensive loading activity. The number of crashes with injuries has decreased on these streets.

Comment 213. Bicycle traffic on 14th Street and nearby side streets will be impacted by the changes (DOT predictions of 50 percent increase in vehicular volume diverted from 14th Street) leading to traffic jams on already congested side streets. (Wortman)

Response: Per Section 5.2.5, “Bicycles,” of the SEA, the addition of the temporary bicycle lanes along 12th Street and 13th Street would provide a safer crosstown cycle path and would not impede capacity or operation of the street. Bicycles would also be separated from automotive traffic due to the dedicated bicycle lanes. As noted in Section 8 of the SEA, MTA NYCT and NYCDOT will monitor traffic conditions during the approximate 15-month shutdown in a dynamic and responsive manner and make adjustments to optimize performance in order to minimize impacts.

Comment 214. Introduction of bike lanes on 12th Street and 13th Street will lead to more bicycle-pedestrian accidents. (Glick)

Response: Per Section 5.2.5, “Bicycles,” of the SEA, the addition of the temporary bicycle lanes along 12th Street and 13th Street would provide a safer crosstown bicycle path and would not impede capacity or operation of the street. As noted in Section 8 of the SEA, MTA NYCT and NYCDOT will monitor conditions, including conditions along 12th Street and 13th Street, during the approximate 15-month shutdown in a dynamic and responsive manner and make adjustments to optimize performance in order to minimize impacts.
Comment 215. I am a resident of the 14th Street area. While I understand that the L must close for repairs, adding bike lanes to 12th Street and 13th Street will cause an extremely negative impact to the community, both in terms of parking and congestion on streets that will already take the brunt of the 14th Street traffic due to the closure. I propose expanding the existing bike lanes around 9th Street to both spread the flow of traffic throughout the area and since those lanes are already in place and can just be expanded. If bike lanes must be added to 12th Street and 13th Street, we ask that they do not remove the row of parking on the north or south side and simply are added between the sidewalk and cars on one side. (M. Greenhaus)

Response: When developing the ASP, MTA NYCT and NYCDOT noted that there was a sizable demand for bicycle access along the 14th Street corridor, but having bicycles on 14th Street would have impeded the operation of the busway. Having them immediately to the south of 14th Street, on 12th Street and 13th Street (rather than on 9th Street), would allow access to the 14th Street corridor. Due to the width of the roadways, and the minimum feasible widths for general travel lanes, bicycle lanes, and parking lanes, the addition of the bicycle lane requires removal of a parking lane on one side of the street.

Comment 216. I continue to stand in support of the DOT’s plans to institute protected bike lanes on 12th Street and 13th Street. Additional protected bike lanes are needed to keep up with the demand and ensure safety. Crosstown protected bike lanes in this neighborhood will bring a 20 percent reduction in overall traffic injuries to the streets on which they are installed, as the DOT’s own analysis has found. I support having only one bike lane on 13th Street and having the other on 12th Street. (D. Duerr, O. Duerr, Brewer)

Response: Comment noted.

Comment 217. I do not know why MTA is planning for a bike lane on 12th Street. Why will we need bike lanes on every street? 8th, 9th, 13th Streets are not enough? Most of the bike lanes are used by delivery guys, who are going on the wrong way anyway. Keep 13th Street as both ways bike lanes; it is better and can be controlled easier by police. Creating a bike lane means more trucks will go through and more trucks will park for loading and delivering. (Kariotis, S. Greenhaus, Jacques)

Response: NYCDOT did look at a two-way bicycle lane on 13th Street but, based on community input and other considerations in development of the ASP, changed it to the two one-way bicycle lanes along 12th Street and 13th Street. Trucks are required to use designated truck routes, unless they are making local deliveries. Creating a bicycle lane does not mean that more trucks would traverse the street or use it for loading and delivery.

Comment 218. Page 32 of the main document refers to one-way bike lanes on 12th Street and 13th Street. Yet on pages 3 and 4 of Appendix E, they state that there will be a two-way bike lane on 13th Street. (Bond)

Response: Appendix E of the SEA is the original planning analysis undertaken by NYCDOT which has been a publicly available document since February 2018. The initial planning identified a two-way bicycle lane on 13th Street but the ASP was revised to reflect public input and other considerations that shifted the plan to two one-way bicycle lanes on 12th and 13th Streets. Since the bicycle lanes do not affect available
travel lane capacities, this change in temporary bicycle lanes does not affect the larger transportation modeling results of the NYCDOT study.

**Comment 219.** Commenters expressed pleasure that the ASP doesn’t include bike lanes on 14th Street and that the ASP no longer includes a two-way bike lane on 13th Street. One-way bikeways on 13th and 12th Streets will raise concerns including pedestrian and bicycle conflict. There is no room for protected bike lanes, and there are concerns about safety in relation to bike lanes. Bike lanes increase dangers to everyone within the vicinity including bicyclists. If the city must build a bike lane as planned, wait until the project is done and traffic is back to normal. (Glick, Goodwin, Marcus, Lidsky, Carucci, Hoch)

**Response:** Single direction bicycle lanes on 12th Street and 13th Street follow established specifications to maximize safety; they would replace one curbside parking lane and would not conflict with pedestrians on the sidewalk, nor through traffic lanes or vehicular movements. Protected bicycle lanes have proven to increase overall safety for pedestrians and cyclists. NYCDOT data show that pedestrian safety has improved on streets in New York City where protected bicycle lanes have been installed.

**Comment 220.** Bike lanes will conflict with parking and traffic patterns and commercial vehicles providing services to residents located along bike lane (north side of street). Bike lanes will take up more space than parked cars currently do and there is not enough room in travel lane for people to travel around because of commercial vehicles. There should not be bike lanes on narrow side streets such as West 12th Street. If there were an actual barrier between the bike lane and the rest of street, vehicles would be double-parked in the street to pick up disabled passengers, effectively blocking all traffic behind them. Overall, considering concerns about traffic impacts, we are against the bike lane plan. (Boriello, Tralongo, Schwartz, Tomei)

**Response:** Single direction bicycle lane design would occupy the one curbside lane of 12th Street and 13th Street and would not disrupt through travel lanes used by vehicular traffic and would have no greater effect on traffic maneuvering around parked commercial vehicles. As noted Response to Comment 206 and Section 6.1.6.2 of the SEA, protected bicycle lanes have proven to be effective and safe ways to enhance bicycle riding in the city.

**Comment 221.** Please do not allow a bike lane on West 12th Street. The bike lanes on 8th Street and 9th Street should be expanded instead, rather than putting the residences on 12th Street in jeopardy. Bikes should use existing bike lanes further south. We have elderly people who will be injured, causing city lawsuits. We need cars that can pull up to the curb on both sides. We have a right to park our cars. This plan will disrupt our quality of life. (Hall, Davis, J. Greenhaus)

**Response:** While there would be localized parking losses with the installation of one-way bicycle lanes on 12th Street and 13th Street, there would not be a significant adverse impact on parking overall throughout the larger project area. Off-street parking in this area would still remain accessible to all motorists. Local access to these streets would still be possible and buffer space in the roadway would provide sufficient room to allow temporary standing for drop-offs and pick-ups. The temporary protected bicycle lanes would add considerably to the safety and capacity of the local bicycle network during the approximate 15-month shutdown. NYCDOT data show that pedestrian safety has
improved on streets in New York City where protected bicycle lanes have been installed.

Comment 222. Support vast bike share (CitiBike) expansion across the corridor. More bike lanes are necessary. (Transportation Alternatives, R. Martin)
Response: Comment noted.

Comment 223. We favor replacing less efficient parking with people-centered transportation. On both 12th and 13th Street, we look forward to tremendous gains in cycling infrastructure, and reduction of on-street parking privileges. Please consider adding protected bike lanes in both directions on Grand Street in Brooklyn, 12th Street and 13th Street parallel to 14th Street in Manhattan, as well as adding protected bike lanes on Berry Street in Brooklyn and 2-way protected bike lanes on South 5th Street in Brooklyn. (Transportation Alternatives, Boursier, Sholl, Hales)
Response: Comment noted. As described in Section 5.2.5, “Bicycles,” of SEA, the ASP would include temporary implementation of one-way bicycle lanes on 12th Street, 13th Street and Union Square West and temporary upgrades to the Grand Street bicycle lane. As noted in Section 8 of the SEA, MTA NYCT and NYCDOT will monitor traffic conditions during the approximate 15-month shutdown in a dynamic and responsive manner and adjust traffic approaches to optimize performance in order to minimize impacts.

Comment 224. I encourage DOT to constantly monitor the cycling trends in the run-up and during the beginning of the shutdown to identify whether or not additional safety measures must be taken to ensure that our communities have the safest and most viable transportation options available during the shutdown and into the future (Adams)
Response: As noted in Section 8 of the SEA, MTA NYCT and NYCDOT will monitor traffic conditions during the approximate 15-month shutdown in a dynamic and responsive manner and adjust traffic approaches to optimize performance in order to minimize impacts.

Comment 225. I am encouraged to see that DOT is including bike improvements with bike lanes along Union Avenue, Devoe Street, Metropolitan Avenue, and Morgan Avenue. (Adams)
Response: Comment noted.

Comment 226. I live on East 12th Street and would welcome a bike lane! Please make sure that it's a protected bike lane and that people are out ticketing drivers to protect it. (Hawkins)
Response: A bicycle lane on 12th Street is part of the ASP. However, it will be a buffer-protected bicycle lane rather than a parking-protected bicycle lane.

Comment 227. Additional (protected) bike lanes should be provided from/to the Williamsburg Bridge to/from the 14th Street Corridor to allow more commuters to travel by bike rather than train or bus. (Chestukhin)
Response: Temporary protected bicycle lanes will be provided along Grand Street in Brooklyn connecting to the Williamsburg Bridge. Once in Manhattan, cyclists will connect to a
previously planned pathway along Delancey Street that connects to the existing protected bikeway network along Allen Street and Chrystie Street and First and Second Avenues. These facilities will connect to temporary buffer-protected facilities along 12th Street and 13th Street providing safe crosstown accommodations in the larger 14th Street area.

Comment 228. I sincerely hope the bike lanes on the bridge and along Delancey are completed in advance—well paved and marked. There is going to be a major surge in usage along with many more pedestrians crossing, as weather permits. Can we create a bike lane on the Williamsburg bridge on one of the car lanes in both directions? The bike path on the bridge gets really busy and is higher than the car lanes. (Davison, Zampa)

Response: These bicycle lanes are part of the ASP and would be completed in time for the start of the closure. A bicycle lane in one of the car lanes of the Williamsburg Bridge would not be safe and would take away lanes needed for buses and other HOV3+ vehicles.

Comment 229. The use of bike lanes and bike stations throttle traffic and prevent deliveries of needed materials to residential buildings on 13th Street between Fifth and Sixth Avenues and will create more unnecessary problems for residents. It blocks the south side of 13th Street from being used by moving vans, plumbing repair contractors, and other contractors for the operation of the buildings. (Schwartz, Wetherhold)

Response: The addition of a curbside protected bicycle lane on one side of 13th Street would remove the parking/loading lane on that side of the street. However, if someone illegally double-parks adjacent to the bicycle lane, there is sufficient street space to allow other vehicles to pass, as there is when vehicles double-park under existing conditions.

Comment 230. I suggest NYCDOT do outreach to cyclists leading up to the closure and in its early days to provide them with information about the city’s bike lane infrastructure as well as the rules of the road. (Epstein)

Response: NYCDOT and MTA NYCT will conduct outreach to commuters, including cyclists, before and during the closure that highlight bicycling as an alternate transportation mode during the L train Tunnel closure. This outreach will include information on safe cycling practice and maps of the extensive bicycle facility network available for cyclists.

Comment 231. There is not a single statistic or study which shows that there will be sufficient need for two cross-town bike paths that 550 parking spaces need to be lost, spaces used mostly by local residents. (Schwartz)

Response: The change from a single two-way bike lane to a pair of one-way bike lanes was made in response to community input. Further, cycling has increased dramatically in New York City over the last several years. Providing safe cycling facilities in close proximity to 14th Street will facilitate a mode shift from private automobile to cycling, which will help prevent an increase in new vehicle trips that would add to traffic volumes along the 14th Street corridor. Further, providing bike lanes in close proximity to 14th Street offers cyclists a safe alternative to 14th Street itself, minimizing potential conflicts with buses.
PARKING

Comment 232. While I realize that this would result in a permanent loss of over 500 parking spaces along 13th Street, the City should be looking for ways to incentivize cleaner transit and make our congested roads more bike and pedestrian friendly. Parking on 15th Street between Fifth and Sixth Avenue should be forbidden to prevent traffic congestion and the associated noise. This should be a 24-hour ban. Parking should be restricted to one side of the street. (Markowitz, Nowakowski, Davis)

Response: The proposed ASP would not result in the permanent loss of any parking spaces. NYCDOT has updated its estimate of the temporary loss of on-street parking spaces. The current estimate is 1,075 on-street parking spaces temporarily lost in Brooklyn and Manhattan during the approximate 15-month shutdown. Within Manhattan, along 12th Street, 13th Street, and 14th Street, there would be approximately 646 on-street parking spaces temporarily lost with an additional temporary loss of 9 on-street parking spaces on Union Square West.

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Source: NYCDOT and MTA NYCT
AIR QUALITY

Comment 233. Commenters disagreed with the conclusion in the SEA that “[t]he temporary nature of the disruption is not expected to result in significant impacts to air quality.” Commenters expressed a belief that this will not be true for side streets which are already clogged with traffic, diesel fumes, noise, and vehicles idling. Commenters believe that traffic and all its side effects will get much worse on side streets for residents that are much more narrow and have tall buildings. Without real traffic data, conclusions drawn regarding air quality are baseless. (Bagan, Bond, Demas, D. Duerr, O. Duerr, Edwards, Finley, Foldi, Patel, Riley, Tyrer)

Response: As discussed in the SEA, the Clean Air Act (1970) and its Amendments (1990) established National Ambient Air Quality Standards (NAAQS) with a purpose to protect public health and welfare. Carbon monoxide (CO) and fine particles (PM$_{2.5}$) are pollutants of concern from mobile sources. The current monitored concentrations in New York City are below NAAQS. The current 8-hour (the strictest) CO NAAQS is 9 PPM, while the current monitored CO concentrations in Manhattan are less than 2 PPM. Vehicles diverted to side streets from 14th Street would be predominantly gasoline-fueled. Even doubling or tripling the number of vehicles on the side streets would not generate emissions higher than CO standards. Particulate pollution from the gasoline-fueled vehicles is not of concern.

Comment 234. The SEA provides little information on potential air quality impacts from the additional diesel buses proposed to operate in Manhattan. MTA is not addressing air pollution, and no information has been provided to residents. Why are only 15 of the new buses proposed to be electric buses? The ASP does not include commitments to air quality monitoring in communities already inflicted with high asthma rates. We also request that ongoing air monitoring at key locations take place along the new bus routes during the shutdown to assess the impact bus emissions are having on the air quality. If Air Quality monitors show the quality exceeds the regional level that day, stop the diesel buses. Immediately. (Johnson, Hoylman, Gottfried, Glick, Rivera, Powers, Epstein, Galleshaw, Greenspan, Loeb, Pesin, Tenenbaum, Williams, D’Arrigo)

Response: The primary pollutant of concern with bus diesel emissions is Particulate Matter, specifically PM$_{2.5}$. NYSDEC has established long-term monitoring stations throughout the New York metropolitan region to assess regional compliance with NAAQS. (The closest monitoring stations to the study area are at PS19 at First Avenue and 12th Street and Confucius Plaza near the foot of the Manhattan Bridge near the intersection of Division and Forsyth Streets.) Based on this broader dataset, New York City was recently (2014) reclassified from non-attainment for PM$_{2.5}$ to attainment/maintenance status, indicating improving air quality conditions. MTA NYCT will closely monitor the results at these two locations, as well as a private monitoring station located in Stuyvesant Town next to 14th Street, before and during the ASP to determine if there appears to be changes associated with implementation of the ASP. In addition, MTA NYCT is determining whether additional monitoring would be helpful given the following:

1) PM$_{2.5}$ monitoring is highly sensitive and can be attributable to a variety of sources including trucks and fugitive dust emanating from both man-made and natural sources.
2) The current standards, as described below, are inappropriate for a short-term project like the ASP. Any monitoring that could be performed would not generate conclusive evidence within the short 15-month duration of the tunnel shutdown of an exceedance of NAAQS that are public health related, because to perform appropriate monitoring, one would need three years’ worth of data. The short-term PM$_{2.5}$ NAAQS is based on a three-year calculation of average concentration over the three years monitored. In each year, the 98th percentile reading (the eighth highest daily reading) is obtained. The three 98th percentile readings are averaged to obtain a value to compare to the NAAQS standard. Therefore, any single daily reading that exceeds the NAAQS value is not evidence of an exceedance of the regulatory standard. Rather, it is but one data point that must be considered within a set of other daily data points within a year, and one year’s data points is not even evidence of an exceedance—remember that the data collection would take three years, or more than twice the duration of this temporary project. It is, therefore, entirely possible that one single elevated reading would not cause a violation of the standard. Additionally, it would be difficult to determine an ultimate cause for any elevated reading, because contributing factors to local air quality are many and dispersed. Therefore, it would be difficult to attribute any monitored increases in PM$_{2.5}$ concentration to the ASP.

Comment 235. Commenters expressed concern about overall air pollution and the air quality impacts including increases in CO and particulate matter, additional traffic, diesel buses, trucks, and construction. Commenters also expressed concern about 70 buses per hour emitting diesel fumes. (Charleston, Cohen, Curtis, Epstein, Fleischer, Hartigan, Loeb, Maloney, Markus, Jaffe, Brewer)

Response: The ASP would use a combination of diesel, electric, and hybrid diesel-electric buses. All diesel buses used for the ASP would be fully compliant with current emissions control technology that achieves up to 95 percent particulate matter emissions reductions in comparison to older technologies. Based on travel speeds and overall changes to traffic patterns, additional buses would not create significant impacts on fine particulate matter (PM$_{2.5}$) concentrations. With CO levels at historic lows in New York City, the diversion of cars from 14th Street to adjacent streets would not create incremental changes in CO that could result in air quality violations of existing ambient standards (see Response to Comment 233, as well as Section 6.2 of the SEA). Emissions from these additional buses would not be higher than emissions from the current diesel traffic (bus and truck) on 14th Street.

Comment 236. The plan calls for a fleet of diesel-burning buses to carry passengers across the Williamsburg Bridge. For the health of our community we need those to be electric buses. Williamsburg has long suffered from some of the worst asthma rates in the city, and we must not let the bus component of the mitigation proposal exacerbate the problem. (Lentol)

Response: Traffic volumes over Williamsburg Bridge and in Williamsburg would be reduced under the ASP (see Response to Comments 114 and 128 as well as Section 6.1.3.2 of the SEA). Emissions from the extra buses introduced with the ASP would be similar to emissions from vehicles diverted from the corridor. Part of the extra bus fleet would be electrical or hybrid diesel-electric with either no local emissions or extremely low emissions. Overall, PM$_{2.5}$ concentrations along the Williamsburg Bridge corridor in
the approximate 15-month shutdown period are not expected to be higher than under existing conditions.

Comment 237. We appreciate every effort made to use electric buses and other low emission buses along 14th Street and for all cross-borough L Train shuttle routes that go up First and Second Avenues, Grand Street and Williamsburg Bridge. (Johnson, Hoylman, Gottfried, Glick, Rivera, Powers)

Response: Comment noted.

Comment 238. Due to narrow sidewalks and tall buildings, exhaust and noise from cars and trucks—unable to move forward in heavy traffic—cannot dissipate properly. West 17th street risks unacceptable increases in pollution. 17th Street and 18th Street will be subject to significantly increased air pollution and traffic since 17th Street and 18th Street are the first streets north of 14th Street that cross town unimpeded by Union Square Park. (Glassman, Adelson, Lieberman, Ashenmil)

Response: Traffic diverted to side streets under the ASP would be predominantly gasoline-fueled. CO is the main pollutant of concern from the gasoline combustion. However, CO emissions from modern vehicles that have catalytic converters are greatly reduced compared with older vehicles without catalytic converters. This is reflected in long-term monitoring trends. CO concentrations in Manhattan are below 2 PPM, well below the strictest (8-hour) CO ambient standard of 9 PPM. Emissions from the diverted traffic would not generate CO emissions that could elevate concentrations close to regulated thresholds.

Comment 239. Commenters expressed concern about air pollution which may lead to an increase of respiratory and other physical and mental health problems. Concerned about asthma impacts, and asthma development among children. Concerned about those who have no air conditioning and rely on opening their windows for air. The Williamsburg and Bushwick neighborhoods have one of the highest rates of asthma in New York City necessitating parity in the number of electric buses being deployed across the two boroughs. Diesel pollution is not just unpleasant; it is also dangerous. The nitrogen oxides produced by diesel engines are a potent irritant for asthma sufferers. Health officials in Italy also noted increased reports of cardiovascular disease. There is a school located on 13th Street between Sixth Avenue and Seventh Avenue. The children will be exposed to the added pollution. (Adams, Carlin, Demas, Gaffney, Gelb, Fleischer, Loeb, Maloney, McCue, Patel, Wortman, Tomei)

Response: The ASP would use a combination of diesel, electric, and hybrid diesel-electric buses. All diesel buses used for the ASP would be fully compliant with current emissions control technology that achieves up to 95 percent particulate matter emissions reductions in comparison to older technologies. Overall, emissions from the ASP buses would not be higher than the current PM$_{2.5}$ emissions in these corridors. Traffic diverted to side streets would not have significant volumes of diesel-fueled vehicles and would not produce significant amounts of PM$_{2.5}$.
Comment 240. The slowdown of traffic from Third Avenue to Ninth Avenue and 20th Street to 3rd Street will cause terrible extra amounts of car exhaust resulting in vastly increased pollution and a significant decrease in air quality and quality of life for both drivers and pedestrians and especially for neighborhood residents. (J. Klein)

Response: Vehicle emissions change with vehicle speed; they are higher at lower speeds. Traffic on the side streets from 3rd Street to 20th Street would mostly be gasoline-fueled. Even with speed reductions under congested flow on the side streets, the increase in CO emissions under the ASP would not generate CO impacts that would be above the 8-hour CO NAAQS, principally due to low CO emissions from modern vehicles. Bus emissions under the ASP would be lower because of the reduction in vehicle delay resulting from the ASP. As a result, emissions under the ASP would be no higher than the current emissions.

Comment 241. The SEA does not examine the danger of Genotoxic Bus Exhaust and therefore fails to evaluate mortality and disease risks to children and other NYC residents. More measurement and mitigation strategies are needed to quantify the risks for residents and workers near the proposed bus routes (including those in Environmental Justice areas), including: prenatal and perinatal risks to unborn and young children who appear to be disproportionately affected by genetic damage from ultrafine particulate emissions similar to those in bus exhaust; that the smallest particulate emissions can pass through bus exhaust filters into the blood stream; an estimate of health effects from genetic fragmentation from diesel emissions; toxicity monitoring strategies; and, a toxicity mitigation plan which can immediately be implemented if and when toxicity along bus routes is documented, to protect downwind residents from cancer and many other combustion-related illnesses that may occur throughout areas surrounding bus routes. Experts such as Mount Sinai Medical Center and Columbia University should be consulted when better plans are developed to monitor and mitigate possible toxic effects of bus exhaust and measure the length, width and time-course of the downwind health impact zone before this ASP is approved. (Martin)

Response: The ASP is a 15-month temporary measure to provide transportation options to the greatest number of diverted L train riders with the least impact on the communities in the L train service area. Overall, the incremental change of increasing ferry service and bus service, particularly along the 14th Street busway, would be balanced by the anticipated decrease in through trucks that would be disbursed among other available designated truck routes as well as the ability to retain ridership on transit. In the long term, the return of a more resilient and safe L train provides a strong opportunity to ensure that subway transit remains the primary mode of travel for the L train service area and minimizes growth in vehicular-based emissions. Much of the L train ridership area comprises Environmental Justice (EJ) communities, and the long-term ability to sustain transit is a critical benefit while the short-term changes associated with incremental bus service would not be disproportionately focused on EJ communities. Further, as established in Section 6.2, “Air Quality,” of the SEA and responses to other Air Quality comments above, the ASP services in place for incremental shifting of traffic patterns are not expected to generate exceedances of national air quality standards for PM$_{2.5}$. There are no national standards for ultrafine particulates. In summary, the proposed ASP would not result in the long-term change of exposure to diesel emissions such that the level of evaluation proposed in the comment would be well beyond the scope of the SEA and mitigation for the proposed project.
Comment 242. Conclusions about the lack of air quality impacts are based on the false premise that trucks will be diverted away from the affected area in Lower Manhattan and that the closure of 14th Street will result in a lower number of cross-town trips on residential streets like 12th, 13th, 15th, and 16th, which is sophistry. (Schwartz)

Response: Conclusions that the ASP would not result in significant air quality impacts are based on the assessment that “the redistribution of trips by location, mode, or time would not be expected to change overall mobility or traffic patterns” (Section 6.2.2 of the SEA), that “[a]ll monitored levels are below respective NAAQS thresholds, even at locations near high levels of traffic and associated congestion from trucks, buses and other vehicles” (Section 6.2 of the SEA), and that any additional emissions would only be experienced over the approximate 15-month shutdown. The SEA does acknowledge that “mobile source emissions from the Proposed Action would be higher along 14th Street and the parallel streets where traffic would be diverted and near the temporary interborough bus routes in Brooklyn and Manhattan on both sides of the Williamsburg Bridge than other areas affected by the Project” (Section 6.2.2.1 of the SEA).

Comment 243. A review of the SEA done for a condominium located on 14th Street concluded that the MTA NYCT did an inadequate analysis of ultrafine particulate attributable to diesel engine combustion. That study is annexed as Exhibit E [“Buses and air pollution on 14th Street, Manhattan,” by Doug Brugge, PhD, MS (August 11, 2018)]. (Schwartz)

Response: The study suggests that the SEA should have analyzed other relevant pollutants that are of concern to human health: ultrafine particles (UFPs), black carbon, benzene, and polycyclic aromatic hydrocarbons (PAHs) (a subset of Mobile Source Air Toxics, or MAST). There are no NAAQS for these pollutants. FHWA has an interim guidance on the MSAT analysis in NEPA documents for priority pollutants, the list that currently includes benzene, polycyclic organic matter, and diesel particulate matter. Projects that do not add substantial new capacity to an existing facility (e.g., projects with incremental traffic lower than 140,000 to 150,000 AADT) are considered to have low potential MSAT effects. Such projects are assessed qualitatively. The qualitative assessment typically includes comparison of the changes in the traffic VMT, composition, speed, and routing between the Proposed Action and the No Action alternatives and associated changes in the MSAT emissions. It would also include discussion of national trends and overall projection of MSAT emission reductions due to stricter engine and fuel regulations implemented by EPA. Because MSAT emission impacts of such projects are generally low, it is not expected that there would be any appreciable difference in the overall MSAT emissions between alternatives.

The study suggests that the SEA should have provided a more detailed assessment of nitrogen dioxide (NO₂), even though the author “doubt[s] that NO₂ exceeds its NAAQS.” The 1-hour NO₂ NAAQS was introduced by EPA in 2010 as a standard that would address near-road impacts of NO₂ emissions. The nation-wide monitoring program was designed by EPA to capture the effects of near-road NO₂, to help to protect communities susceptible to NO₂-related health effects and to determine compliance with the new standard. The three-year monitoring program did not find exceedences of the 1-hour NO₂ standard. Since then, compliance has been demonstrated everywhere in the country. New York has NO₂ monitors in the Bronx and Queens. All monitors measure low concentrations of 1-hour NO₂ (55 to 59 ppb), well below the 1-hour NO₂ NAAQS of 100 ppb. Monitors in Queens are located near the Long Island Expressway (LIE) at 153rd Street and Kissena Boulevard. The LIE
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carries a high percentage of trucks (up to 20 percent in some hours), including diesel trucks. The annual NO$_2$ NAAQS was set up mostly for industrial sources. Annual concentrations monitored in New York are even lower than the 1-hour compared with the NAAQS (14 to 17 ppb in comparison to the NAAQS of 53 ppb). EPA did not recommend modeling NO$_2$ impacts of traffic following the low levels monitored near roadways around the country.

The study criticizes the SEA for emphasizing the fact that the ASP buses will be retrofitted or hybrid and electric. The study asserts that using such buses does not preclude exceeding the NAAQS. The last statement is true. However, the bus fleet and the general traffic fleet comprise vehicles manufactured in different years and compliant with emission standards of the year of manufacture. The ASP plans to deploy buses that are either compliant with the latest and lowest emission standards or are electric or hybrid diesel-electric buses to reduce air quality emissions. As noted in Section 6.2.2.1, “Mobile Source Impacts,” of the SEA, “[w]hile the number of buses within the [14th Street] corridor would increase up to 68 trips under the Proposed Action, … the composition of the supplemental bus fleet, including a plan for 15 electric buses and diesel buses that achieve 95 percent particulate matter [emissions reductions in comparison to older technologies], would ensure that no significant particulate matter impacts would result from the additional bus service under the Proposed Action along the 14th Street corridor.”

The study acknowledges that it is doubtful CO, PM$_{2.5}$, PM$_{10}$, or NO$_2$ would exceed NAAQS under the Proposed Action; however, the study further states that NAAQS address regional pollution and not local conditions and, therefore, are not protective of the health of the population residing near roadways. The SEA concurs with the conclusion that there would be no CO, PM$_{2.5}$, PM$_{10}$, or NO$_2$ NAAQS exceedances. However, contrary to the assertion that NAAQS are not protective of local conditions, NAAQS were designed to address local air quality as well as regional. Some pollutants are of only regional concern, like ozone, some are of concern on a regional as well as a local scale. And others, primarily CO and PM$_{10}$ are more local. As was noted above, the 1-hour NO$_2$ NAAQS was specifically aimed at the near road pollution. When CO NAAQSs were first promulgated in 1971 (last reviewed in 2011), they were regarded as standards mainly targeting incomplete combustion in gasoline-fueled vehicles near roadways. PM$_{2.5}$ emissions come from incomplete combustion of fossil fuel, including in vehicles, especially with diesel engines. As such, it is expected that PM$_{2.5}$ concentrations near roadways with high volumes and a high percentage of diesel vehicles would be elevated. EPA’s Transportation Conformity Guidance for Hot-Spot Analyses for PM focuses on modeling of hot spot (local area) concentrations to demonstrate conformity with the PM NAAQS. In summary, EPA considers and recommends using NAAQS for local scale compliance and as protective of public health at a local scale. Transportation conformity has specific requirements of local compliance with CO and PM NAAQS.
HISTORIC, CULTURAL, AND ARCHAEOLOGICAL RESOURCES

Comment 244. Commenters expressed concern about damaging effects to historic buildings and aging infrastructure from increased vibration from truck traffic. Commenters stated MTA NYCT should advise all building owners that may be affected by the ASP to obtain engineering studies now to assess potential impacts from additional vibrations. (Errera, Schindelheim)

Response: Vibration levels from rubber tire vehicles, such as buses, typically vary from 50 to 60 velocity decibels (VdB) and are well below the level of human perceptibility. Human perceptibility starts at 65 VdB. Vibration levels would need to exceed 80 VdB to damage structures, including sub-surface infrastructure, which is not possible with a rubber tire vehicle independent of its weight. By letter dated June 25, 2018, the New York State Office of Parks, Recreation and Historic Preservation (the New York State Historic Preservation Office) noted that the “project’s area of potential effect includes several areas within the city of New York, which are considered historic” but concluded that the area of potential effects (APE) would have “no effect on eligible or listed resources” (see Appendix F of the SEA).

Comment 245. The MTA’s SEA does NOT accurately reflect the scope or impact of their plan on narrow residential streets in at least five historic neighborhoods. The side streets and beautiful old Flatiron buildings are in no way prepared to deal with this situation. (Finley, Avneri)

Response: By letter dated June 25, 2018, the New York State Office of Parks, Recreation and Historic Preservation (the New York State Historic Preservation Office) noted that the “project’s area of potential effect includes several areas within the city of New York, which are considered historic” but concluded that the APE would have “no effect on eligible or listed resources” (see Appendix F of the SEA).
NOISE AND VIBRATION

Comment 246. Commenters expressed concern about noise pollution and expressed concern that it would affect homes, businesses, and quality of life. Commenters also stated that the SEA analysis was done without real traffic data, and that conclusions drawn regarding noise and vibration were baseless. Commenters also stated there will be a need for inspectors to deal with noise regulations. (Bond, Carlin, McCue, Patel, Wheatley, Wortman, D’Arrigo, Jaffe, Williams)

Response: Noise and vibration impacts are considered in Section 6.6, “Noise and Vibration,” of the SEA and uses traffic counts completed as part of the assessment of traffic impacts. Vibration was assessed following guidance in FTA’s “Transit Noise and Vibration Impact Assessment” (FTA-VA-90-1003-06), May 2006. Noise was assessed following the more stringent standards provided in the City Environmental Quality Review Technical Manual. Following the CEQR standards, and as stated in Section 6.6.2.1 of the SEA, “there would be no doubling of passenger car equivalents (PCE) volumes on the side streets accommodating diverted auto traffic (a PCE value of one).” Without a doubling of PCE, increases in noise levels would not be perceptible (3 dBA [A-weighted decibels] threshold). Per the FTA guidance document, vibration levels from rubber tire vehicles, such as buses, typically vary from 50 to 60 VdB, which is well below the level of human perceptibility (which starts at 65 VdB).

Comment 247. Commenters expressed concerns about negative impacts to noise quality from increases in traffic, and damage to structures and aging infrastructure from vibrations. Traffic and noise and vibrations will get worse as traffic increases and commercial garbage trucks from New Jersey continue to move through the neighborhood at night. (Curtis, Dinhofer, J. Klein, Marcus, Schwartz, Johnson, Hoylman, Gottfried, Glick, Rivera, Powers)

Response: Vibration levels from rubber tire vehicles, such as buses, typically vary from 50 to 60 VdB and are well below the level of human perceptibility. Human perceptibility starts at 65 VdB. Vibration levels would need to exceed 80 VdB to damage structures, including sub-surface infrastructure, which is not possible with a rubber tire vehicle independent of its weight.

Comment 248. With 17th and 18th Streets being the first streets north of 14th Street that cross town unimpeded by Union Square Park, we will be subject to substantially increased noise pollution. Noise will be deafening and sleep will be disrupted. How will the nightly noise be mitigated for residents of 14th Street? I live on 22nd Street, which is always full of traffic because it is one street below 23rd Street, and I do not want to see it get more crowded with more honking horns. Commenters expressed concern for the incessant noise from traffic & honking all the time which goes totally unchecked by the police. (Foldi, Glassman, McCue, Soderberg, Strider)

Response: See Response to Comment 246, as well as Section 6.6 of the SEA. Additionally, the through traffic restrictions for the 14th Street busway would only be in effect until 10:00 PM, which would limit the effects of the ASP on nearby side streets at night. As part of its coordination with NYPD on various traffic enforcement laws during the approximate 15-month shutdown, MTA NYCT will request that NYPD personnel appropriately enforce regulations relating to truck routes and vehicle horns.
Comment 249. The Project’s SEA must take into account the potential noise pollution resultant of blocked emergency vehicles. (Community Board 4)

Response: The ASP anticipates full emergency vehicle access to all streets. The evaluation of aggregate travel times in the 14th Street corridor indicates improved conditions compared to the No Action Alternative, and no project-generated blockage of emergency vehicles would be expected so no incremental noise from emergency vehicles would be anticipated.

Comment 250. Commenters expressed concern about noise pollution which may lead to an increase of physical and mental health problems. There is a school that is located on 13th Street between Sixth and Seventh Avenues and the children will be exposed to the added noise. (Carlin, Demas, McCue, Wortman)

Response: See Response to Comment 246, as well as Section 6.6 of the SEA. The school on 13th Street between Sixth and Seventh Avenues was recognized as a potential sensitive receptor in the assessment of noise impacts. Interior noise levels within the school (assuming windows closed) would be 25 to 30 decibels lower than exterior noise levels.

Comment 251. Side streets cannot dissipate the noise properly with narrow streets and tall buildings. These side streets were designed to accommodate light traffic, not the weight and vibrations of heavy traffic. The DOT estimated 50 percent increase in vehicular volume on the narrow, residential streets. (Akhmetov, Bagan, Demas, Tyrer)

Response: While certain side streets may experience an increase in traffic volumes of 78 percent at certain locations as compared to the No Action Alternative, overall side street volumes are projected to increase by approximately 54 percent over the No Action Alternative. Both increases are below the New York City CEQR threshold of a 100 percent increase (a doubling) in passenger car equivalents (PCEs) that would cause a significant adverse noise impact. While individual locations in the larger network may experience additional volume, the temporary nature of the disruption is not expected to result in significant noise impacts and would be improved over the No Action Alternative.

Comment 252. What about all of the noise on the streets from all of the diverted traffic? How will this be handled? Will we have a dedicated 24/7 police officer on our block monitoring all of this? This might be the only solution to keep residents at ease. (Cerrone)

Response: See Response to Comment 246, as well as Section 6.2 of the SEA. As part of its coordination with NYPD on various traffic enforcement laws during the approximate 15-month shutdown, MTA NYCT will request that NYPD personnel appropriately enforce regulations relating to truck routes and vehicle horns.
PARKLANDS/SECTION 4(f)

Comment 253. Stuyvesant Cove Park must be modified or obliterated by the plan because there is no space and the diagrams don’t show standing areas for buses. (Robinson)

Response: There would be only minor changes to Stuyvesant Cove Park under the ASP. First, the ferry terminal to be used is already in place as part of the NYC East River Ferry Service. Second, all temporary SBS bus operations would be located below the FDR Drive viaduct and would not interfere with Stuyvesant Cove Park. There would be a temporary walkway connecting this bus terminal with the main walkway providing access to the ferry terminal. The park would be restored to its original condition after the approximate 15-month shutdown.

Please note that while the July 2018 SEA and Section 4(f) review for the Canarsie Tunnel Project did not mention the removal of a tree and bench, and relocation of one garbage can, plans were later modified in coordination with NYCEDC to create the most direct connection to the ferry. This addition to the plan does not increase the affected area and falls within a Section 4(f) *de minimis* determination.
CUMULATIVE IMPACTS

Comment 254. Commenters expressed concern about the many construction projects that must be completed along the corridor before the project begins. There is no clarity if agencies will work together with private developers on these projects. Impacted areas should not have additional construction during this period. MTA NYCT and NYCDOT need to coordinate implementation of the ASP with Verizon, Con Ed, Beth Israel, etc. to avoid conflicts between the ASP and any construction. The cumulative impacts of the proposed ASP and planned or potential construction activity (both utility work within the right-of-way and private development work that may reduce lane widths or close lanes) must be assessed. (Curtis, Garth, Glick, Huebsch, Cohen, P. Kahn)

Response: MTA NYCT has been in close communication with Con Ed and Verizon (see the list of meetings held in Appendix C of the SEA). MTA NYCT has also been in communication with private developers regarding potential construction projects within the 14th Street corridor.

Comment 255. Currently, scaffolding is being erected on the south side of 14th Street between Broadway and Fourth Avenue for work that was apparently approved by DOB. This is at the confluence of a major chokepoint in the mitigation plan as outlined in the SEA. With so many additional pedestrians traversing 14th Street during the shutdown, lining up to board the M14 SBS, and others who have come to this area for the Union Square Greenmarket, Mount Sinai Beth Israel services, or other shopping destinations, there should be a moratorium on additional non-emergency construction. (Johnson, Hoylman, Gottfried, Glick, Rivera, Powers)

Response: MTA NYCT and NYCDOT have been coordinating with NYC Department of Buildings (NYCDOB) and private developers in an effort to limit construction impacts along 14th Street, where feasible. This may include limiting the timeframe during which certain construction activities may occur, limiting the sidewalk space utilized for construction activities, and at street corner sites, locating construction staging areas on adjacent avenues.
Comment 256. I do not see where the report analyzes other construction and development projects that will be going on during the same period, in the same area and streets that will be affected by the L Train project. It concerns me that there doesn't seem to be a strategy that coordinates and takes into account these other large and disruptive projects. There is a plan to build a huge high rise tower on 16th Street, between Park Avenue South and Irving Place, right in front of my building. At a recent Community Board meeting on the subject, the developers talked about wanting to start construction in 2019. It was VERY alarming to those of us present that these developers had not taken into account or addressed the L Train shutdown and project in any of their very limited environmental studies. The 16th Street high rise construction will cause huge traffic problems in the neighborhood, air and noise pollution, and an obvious increase in traffic on my street (15th Street) to accommodate the construction and those vehicles displaced from 16th Street. Adding all of the L Train plans and changes you are seeking to do, my street and area will be even more over-saturated and negatively impacted. Do not approve the construction permits of projects that would not allow you to proceed with the urgent L Train repairs. But if you do, please propose a fully coordinated, holistic, inclusive, and united Environmental Assessment and plan for the city! (de Riva)

Response: See Response to Comment 254, as well as Appendix C of the SEA.

Comment 257. We are concerned about the aging utility infrastructure and buildings, gas leaks, and steam pipe explosions. Concerned about the weight of the constant traffic on infrastructure which is only 15 inches thick before it hits gas, water, and steam pipes. Residents are subject to the risks posed by failing infrastructure because of overburdened streets, and excessive emissions. The integrity of structures and aging infrastructures will be at risk and there should be concern for building foundations. (Aronson, Cerrone, Curtis, Demas, Dinhofer, Glassman, Gonzalez, Marcus, McCue, Tryer, Nichols)

Response: Vibration levels from rubber tire vehicles, such as buses, typically vary from 50 to 60 VdB and are well below the level of human perceptibility. Human perceptibility starts at 65 VdB. Vibration levels would need to exceed 80 VdB to damage structures, including sub-surface infrastructure, which is not possible with a rubber tire vehicle, independent of its weight.

Comment 258. Commenters expressed concern about the new developments along Grand Street, and how there is too much construction. Other ancillary projects should be completed throughout lower Manhattan before this project starts. (Glick, Loeb)

Response: See Response to Comment 254.

Comment 259. We are pleased to hear that NYCDOT is reaching out to both big-box retailers and small businesses in seeking to shift deliveries throughout the affected area to off-peak hours. We hear that NYCDOT is also meeting with developers to require them to strictly limit the use of streets to operate during construction, and is coordinating with the NYCDOB to limit when possible the installation of sidewalk sheds on 14th Street. (Community Board 4)

Response: See Response to Comment 254.
**Comment 260.** There has been a rumor that one plan is considering halting construction in the immediate area and side streets. Is this true? (Riley)

**Response:** See Response to Comment 254.

**Comment 261.** The impact of building construction on lane closures is being ignored because they are “as of right.” Just an example to as it effects your current traffic plan: The old Greenwich Savings Bank building on the corner of Sixth Avenue and West 14 Street is not yet demolished (there is netting all around it) but construction in 2019 will be a major detriment. Then there is, the Corner Building being knocked down, and new Apt building being put up. Same thing across the Street on the east side of 14th Street and Sixth Avenue. Same thing on West 13th Street by the New School, between Fifth and Sixth Avenues and on University Place. There is also a construction project on West 15th Street between Fifth Avenue and Sixth Avenue that already causes major issues. Will such projects be forbidden during the 15-month closure? Will such projects be forbidden during the 15-month closure? They should suspend construction permits for all sidewalk and street closures during mitigation. (Donen, Groncki, Markowitz, Wortman)

**Response:** See Response to Comment 254.

**Comment 262.** Our streets risk unacceptable increases in pollution, damage to structures and infrastructure, hindrances to emergency vehicles and untold hazards for people living and working there. (Ryan, Adelson, Lieberman, Ashenmil, White)

**Response:** See Response to Comment 257 as well as Section 6.6.2.3 of the SEA for potential damage to structures and infrastructure. See Response to Comment 173, as well as Section 5.2.3.2 of the SEA, for access for emergency service vehicles.

**Comment 263.** It's revealing that none of the Comment Topics above address financial and safety concerns. That absence indicates the degree to which the DOT has ignored issues which affect the life, health, and livelihood of people who will be impacted by the planned closure of 14th and the increased congestion of 13th and 15th Streets. When a person dies because s/he cannot get timely care from EMT, the DOT will be liable. When businesses on 13th Street, 14th Street, and 15th Street tank because customers or deliveries can't get to them, class action suits against DOT will be the only remedy for bankruptcies. These are foreseeable outcomes from a plan that prevents any semblance of normal vehicular traffic on 14th Street for 15-months or more. (Valenti, Maras, Schlesinger, Feinn)

**Response:** Under the ASP, emergency service vehicles would be able to use 14th Street and would be able to navigate side streets using existing regulations requiring vehicles to yield to emergency service vehicles. Regarding customers accessing businesses on 14th Street, the ASP would facilitate the movement of more people across 14th Street than under the No Action Alternative. Also, NYCDOT has done and plans to continue outreach to businesses on 14th Street. NYCDOT’s Freight Mobility group will be working with local businesses to facilitate deliveries. In addition, MTA NYCT, in coordination with NYCDOT, will work with the NYPD on enforcement of traffic regulations.
PUBLIC OUTREACH

Comment 264. The 14th Street Coalition has presented alternative solutions to the New York City Council and Community Boards 2 and 5 in Manhattan, which believe they have merit. The MTA has been at attendance at many of these sessions, so are aware of the recommendations, but have failed to consider them. (Pesin)

Response: In developing and refining the ASP, MTA NYCT and NYCDOT have received input and feedback from a wide range of concerned community members and stakeholders. All of this feedback has been reviewed and considered by MTA NYCT and/or NYCDOT staff. Many of the suggestions or recommendations received are in conflict with suggestions or recommendations received by other stakeholders, so not every recommendation can be implemented. However, the ASP was modified as it was developed to reflect specific community suggestions. Specific modifications that have been made to the ASP (as it was analyzed in the SEA) include allowance for local access to 14th Street; splitting the proposed bicycle lane on 13th Street into two bicycle lanes on 12th Street and 13th Street; modifications to the L4 interborough bus route; and adding the Union Avenue bus stop.

Comment 265. I am also calling on the MTA to open an L train Canarsie Tunnel Reconstruction information center that will provide information to residents during the temporary shutdown. This center could be something similar to the facility that existed during the Second Avenue extension project for residents in the Upper East Side and would be staffed by MTA Capital Construction so residents will be able to get real-time information on the progress of the construction. (Adams)

Response: MTA NYCT is creating many channels to keep customers informed about the progress of the approved Canarsie Tunnel Project and the ASP. In addition to the over 70 meetings MTA NYCT has attended and hosted already, MTA NYCT will update the existing project web-site and provide in-person opportunities to meet with individuals or businesses affected by the project.

Comment 266. MTA needs more community engagement and needs to work closely with neighborhoods and look at all the impacted blocks with residents including those in underrepresented populations and Brooklyn. Commenters expressed concern about overall public outreach from MTA (Charleston, Epstein, Godfrey, Groncki, Lawrence, Maloney, Marcus, Cohen, Williams, Ingall)

Response: MTA NYCT and NYCDOT have conducted over 70 outreach sessions within the affected communities (see Appendix C of the SEA). MTA NYCT and NYCDOT will continue to solicit community input as the ASP is implemented.

Comment 267. I must again reiterate my displeasure with the amount of community engagement to date. (Brewer)

Response: MTA NYCT and NYCDOT have conducted over 70 outreach sessions within the affected communities (see Appendix C of the SEA). MTA NYCT and NYCDOT will continue to solicit community input as the ASP is implemented.
Comment 268. Less information has been provided to the neighborhoods south of Houston street. MTA NYCT’s focus has been on 14th Street area and NYCDOT and MTA NYCT continue to exclude the Kenmare Street area from their studies. There should be outreach to members of the community who can collaborate about solutions especially along Kenmare Street (Glick, Goldberg, Lawrence, Tenenbaum)

Response: MTA NYCT and NYCDOT presented to the relevant local community boards, Manhattan Community Boards 2 and 3, on numerous occasions. Presentations made to each of these Community Boards in February and May of 2018 showed the proposal to operate buses via Kenmare Street. Presentations from the summer of 2017 showed the proposal for interborough buses to serve the Delancey St-Essex St station and then proceed to the Spring St 6 train station.

Comment 269. I am horrified that there was no information given on study conducted throughout area, nobody knew about the efforts for creating a plan for project, disturbed that plan is not solidified yet. (Goldberg, Tenenbaum)

Response: MTA NYCT and NYCDOT have conducted over 70 outreach sessions within the affected communities (see Appendix C of the SEA). MTA NYCT and NYCDOT will continue to solicit community input as the ASP is implemented.

Comment 270. Several commenters expressed concern that the MTA was receiving public input but not making changes to the service plan in response to those comments. The plans should be flexible and temporary (Berkowitz, Charleston, Godfrey, Marcus, Ettinger)

Response: MTA NYCT has already made changes to the ASP based on public input received since May 2017 (see Appendix C of the SEA). Specific modifications that have been made to the ASP include allowance for local access to 14th Street; splitting the proposed bicycle lane on 13th Street into two bicycle lanes on 12th Street and 13th Street; modifications to the L4 interborough bus route; and adding the Union Avenue bus stop. As noted in Section 8 of the SEA, MTA NYCT and NYCDOT will monitor traffic conditions during the approximate 15-month shutdown in a dynamic and responsive manner and adjust traffic approaches to optimize performance in order to minimize impacts.

Comment 271. I am concerned these measures will become permanent. (Curtis, Williams, Feinn)

Response: With the exception of certain subway station improvements identified in Table 1 of Section 4, “Analytical Framework,” of the SEA, none of the service enhancements comprising the ASP are considered permanent. Any modification of a temporary enhancement to a permanent enhancement would require additional planning, agency coordination, public outreach, and/or appropriate environmental analysis at a later point.

Comment 272. I believe there should be more environmental studies but I am grateful that New York City has the decency to hold hearings and conduct environmental studies; thanks to MTA for having a hearing on the project. (D. Greif)

Response: Comment noted.
Comment 273. Regarding MTA communications with the community, our attorney told us about the SEA and this hearing, other than that, we have seen little public notice of either. In fact, as recently as today, August 6th, the MTA does not even have this hearing on its Public Hearings page. Does the MTA not want the public to be aware of the SEA and this hearing? (Bond)

Response: A Notice of Availability of the SEA was published on the MTA website on July 20, 2018 and in newspapers. Copies of the SEA were also made available on the MTA website and at multiple locations (including community board offices and libraries) on July 20, 2018.

Comment 274. I am against any plans that the MTA/DOT or any other special interest group has in mind to keep any of the proposed changes permanent without local community resident input. (Wortman)

Response: Any modification of a temporary enhancement to a permanent enhancement would require additional planning, agency coordination, public outreach, and/or appropriate environmental analysis at a later point.

Comment 275. Environmental and traffic effects, plans for changing streets, bike lanes, overall impact to neighborhoods and environment and concerns over why the public seems not to be considered or asked about solutions. These solutions appear to be rigid and without desire to respond to owners and residents of area, who are taxpayers and will also be affected. (Ettinger)

Response: MTA NYCT has been responsive to public input. As shown in Appendix C of the SEA, NYCDOT and MTA NYCT have engaged in an extensive outreach process to share and receive public input on the ASP. Due largely to public input, an additional interborough bus route was added and additional bus stops were added to other interborough routes. Prior to the development of the ASP, MTA NYCT engaged several rounds of public meetings, including meeting with every community board along the L corridor. Public input was key in the decision to proceed with the plan for a full-time closure of the tunnel as well as in developing the concept for the 14th Street busway and short interborough bus routes that have high frequency and connect to subways in Manhattan.

Comment 276. Thank you very much for your response to my earlier letter expressing specific concerns about the L train closure and the traffic problems it will cause on streets on either side of 14th Street. But, unfortunately, you really did not answer my specific questions. I would appreciate it if someone more senior could respond to my questions specifically. Based on my questions, I do not see how you can consider this a closed case. The mere fact that you provided an answer, despite the fact that it barely answered a single question, should not be the basis for closing the case. (Riley)

Response: Comments received during the SEA comment period are addressed in this Response to Comments attachment.
Comment 277. I would like to initiate and organize a positive campaign around the L train shutdown to inspire people to stay invested in their neighborhood, help them realize resiliency, reduce the image of an apocalypse, and provide resources. I am emailing you to see if there is a campaign in the works to your knowledge, and if this would be something you would be interested in. This would also include support and hopefully funding from the relevant small business alliances in the area (ie, you!), MTA, developers, etc. (Brannon)

Response: Comment noted. MTA NYCT is planning an extensive community outreach campaign to educate L train riders about the transit alternatives and would support small businesses during the tunnel closure by ensuring customer and employee access.

OTHER COMMENTS

Comment 278. The L train shutdown is a great opportunity for NYC to implement a real Bus Rapid Transit system with physically segregated lanes and signal priority. (Bergman)

Response: This comment reflects a long-term planning policy initiative that would be outside the specific and temporary application of the ASP measures during the 15-month tunnel closure.

Comment 279. Many civic organizations, trade unions and sustainable transportation advocates, support the recommendations of engineer GridlockSam Schwartz and the Move NY Fair plan, which can be found at: http://iheartmoveny.org/#why-moveny. The solutions found in the Move NY Fair plan would equalize the deleterious effects of the L Train shutdown, and at the same time reshape New York’s transportation system into one that more efficiently serves commuter needs. Many of the following remedies, suggested by various experts, are included in the Move NY Fair plan: Congestion Pricing; Carbon Tax; Move toward a 50 percent reduction in vehicular traffic throughout Manhattan; Encourage carpooling by charging fees for single driver cars; no charge for cars with 3 or more passengers; Use only Electric Buses on 14th Street and expand Electric Bus fleets across Manhattan; Install Electric Vehicle (EV) charging stations at Con Edison, parking garages and elsewhere; Help Cab drivers exchange taxis for EVs and give EVs preferential access; Address the freight issue, especially in densely trafficked areas – impose truck/vehicle fees based on emissions; Lower tolls to encourage truckers to use highways instead of city streets; Price segments of road to correlate with patterns of usage and time of day, lower fees for off peak hours, etc.; Charge vehicles according to number of axles, registration and type of vehicle. (Bogok)

Response: These recommendations involve long term policy changes and infrastructure investment with a broad range of stakeholders and involved agencies and a long period of implementation. The temporary ASP is established to provide immediate short term transit options to L train riders during the 15-month closure. Therefore, the overall recommendations of the Move NY Fair plan are beyond the scope of the ASP and are not evaluated in the SEA.
Comment 280. Obviously the tunnels have not collapsed. I really think you should reconsider closing both tunnels and close one at a time. (Marenson, Padula)

Response: The risk to operations and safety of not undertaking the tunnel rehabilitation in a timely manner has been well-established. As detailed in Appendix A of the SEA, the MTA NYCT analysis of tunnel closure options identified a one tunnel at a time closure to be substantially longer, more difficult, and more inefficient compared with the full tunnel closure. As stated in Appendix A of the SEA, during a public outreach process in 2016, 80 percent of public comments expressed a preference for the full tunnel closure option.

Comment 281. The L train is sited in a federally designated flood plain without this major emergency plan addressing that. So by the time this Tunnel Plan is finished, there might be new flood that damages and incapacitates the L train yet again. (Bulbach)

Response: MTA NYCT acknowledges that portions of the L train infrastructure are in the 100-year floodplain. MTA NYCT is committed to protecting this infrastructure from future flooding by incorporating integrated resiliency measures within the Canarsie Tunnel Project including water-tight junction boxes/cable/conduit penetration seals, and a new reinforced duct-bank with fiberglass ducts that will improve flood resiliency. In addition, other federally funded Sandy projects will help ensure water does not enter the tunnel in the first place. These projects include fortifying (by installing flood walls) the North 7th Street fan plant on the Brooklyn side of the Canarsie Tunnel, and installing mechanical closure devices (MCDs) and watertight access hatches along 14th Street to stop water from entering street openings and the fan plant on the Manhattan side of the Canarsie Tunnel.

Comment 282. CitiBike service has deteriorated over the last year. Most mornings there few (often no) bicycles at the docks at 11th and 13th Streets and Sixth Avenue, or anywhere near there. (Landsman)

Response: Comment noted. NYCDOT is working with the operator of CitiBike to add bicycles within the ASP zone, as well as other areas within the Manhattan core.

Comment 283. Make the Midtown Tunnel Manhattan-bound only during the AM rush. (Moss)

Response: This is a broader regional transportation recommendation that would not be specific to the temporary ASP’s goal of transit options for L train riders.

Comment 284. Fix the electronic signs at First Avenue and Third Avenue to tell passengers where the next train is, and how long till the next one. (Bandman)

Response: This comment is beyond the scope of the SEA on the ASP for the Canarsie Tunnel Project.

Comment 285. Since you are planning to reconfigure and widen stairs between the Broadway line and the L train platforms at Union Square, you should do the same at the Sixth Avenue L train stop to and from the F/M train platform at 14th Street to improve passenger circulation, there should be two sets of stairs on the L train platform at Sixth Avenue to & from the F & M train platform as well. (Follo)

Response: These improvements are beyond the scope of the ASP for the Canarsie Tunnel Project.
Summary of Comments and Responses

Comment 286. Cooling systems—similar to what is currently in place on the 4,5, and 6 trains in Grand Central Terminal—should be installed at both the Union Square and Bedford Avenue subway stations. (Cooling systems should also be installed at Times Square on the 1,2, and 3, and at 86th Street, 59th Street, and Fulton Street on the 4,5, and 6). “Step-aside” signs on the platform indicating where doors open should be installed at all L Train stations between 8th Avenue in Manhattan and Myrtle Avenue in Brooklyn. (These same “step-aside” signs should also be installed on platforms at 59th Street, 50th Street and 34th Street—Penn Station on the 1,2, and 3, as well as 86th Street, 59th Street, Brooklyn Bridge City-Hall, Fulton Street, Wall Street and Bowling Green on the 4,5, and 6 trains). (Wallner)

Response: This comment is beyond the scope of the SEA on the ASP for the Canarsie Tunnel Project.

Comment 287. I live in Brighton Beach and there is only one escalator which goes to the mezzanine but there is no escalator which goes to the platform, and there is no down escalator. Also the escalator at this station often breaks and I have seen the employees turn it off for no reason—what if someone is disabled? (Malyar)

Response: This comment is beyond the scope of the SEA on the ASP for the Canarsie Tunnel Project.

Comment 288. Please upgrade all five L train stations in Manhattan with improvements such as refurbished stairways and new lighting and painting. Please revitalize four L train stations in Brooklyn and one in Manhattan—at Morgan Avenue, DeKalb Avenue, Halsey Street, Bushwick Avenue-Aberdeen Street, and Sixth Avenue—by repairing or replacing wall tiles, columns, platform edges, and floors. There is no elevator or ramp to the L train at either New Lots or Livonia Ave for the physically challenged. I noticed that there is no upgrade of the L train after Bushwick-Aberdeen; have the people from Canarsie to Atlantic Avenue been forgotten (mostly people of color). (Glasgow)

Response: Permanent station improvements are beyond the scope of the ASP for the Canarsie Tunnel Project. Note, however, that major permanent station improvements at Bedford Av and 1 Av are part of the Core Capacity project.

Comment 289. The Number B15 Bus that runs to the Airport should be an SBS bus to give airport passengers and workers more room to put baggage and improve schedule. This bus usually gets overcrowded, especially at the New Lots (L Train) connection, so that many people going to the Airport are unable to get on. The other Number B15 Bus that goes to the Postal Facility should remain local to service the other passengers. (Glasgow)

Response: This comment is beyond the scope of the SEA on the ASP for the Canarsie Tunnel Project.

Comment 290. When will something be done about both the B47 and the B83? Why is it during the evening rush hour, there are not more buses on the B83 line heading to either Gateway Mall or Seaview Ave? These buses are packed every single night. (Whelan)

Response: This comment is beyond the scope of the SEA on the ASP for the Canarsie Tunnel Project.
Comment 291. We need to stem the tide from the Williamsburg Bridge to the Holland Tunnel route. The MTA and DOT and all the elected representatives who care about their constituents need to put pressure on a national level to reverse the toll on the Verrazano Narrows Bridge. (Fleischer)

Response: This comment is beyond the scope of the SEA on the ASP for the Canarsie Tunnel Project.

Comment 292. With the increase in bikes and vehicular traffic, Fifth and Sixth Avenues are becoming increasingly dangerous for pedestrians, especially for the visually handicapped who come from all over to visit the Andrew Heiskell Library for the Blind on W 20th Street. (Finley)

Response: This comment is beyond the scope of the SEA on the ASP for the Canarsie Tunnel Project.

Comment 293. For cyclist safety, create more visibility (daylighting) at bike lane intersection treatments (convert mixing zones into protected intersections, for example). Prioritize crosstown signal timing along the busway and 12th and 13th Street Bike Lanes. (Transportation Alternatives)

Response: As noted in Section 8 of the SEA, MTA NYCT and NYCDOT will monitor traffic conditions during the approximate 15-month shutdown in a dynamic and responsive manner and adjust traffic approaches to optimize performance in order to minimize impacts.

Comment 294. More people will be trafficking 15th Street. There are already numerous amounts of people drunk or on drugs sleeping and hanging out on 14th Street and they will now be displaced into the side streets. The neighborhood will no longer become a place to raise a family. These unsafe conditions will need to be addressed. (Cerrone)

Response: This comment is beyond the scope of the SEA on the ASP for the Canarsie Tunnel Project.

Comment 295. The value of my apartment may decrease. (Williams)

Response: Effects of the proposed ASP on property value are entirely speculative. This comment is beyond the scope of the SEA on the ASP for the Canarsie Tunnel Project.

Comment 296. Don't allow 18 wheelers and other large trucks in the area between 23rd and Houston for the duration of the L train shut down. These trucks (from CVS and Dunkin Donuts, etc.) make small deliveries to a large number of stores and should be required to transfer to smaller trucks before entering the area. This should be made a permanent policy for all of NYC in the long run, but immediate policy for our local area during the L train shut down. (Maras)

Response: This comment is beyond the scope of the SEA on the ASP for the Canarsie Tunnel Project.
Comment 297. Please, please, please add at least one more entrance to each 7-train platform at Court Square. The current configuration can barely handle the existing traffic and with more people changing from the G there's going to be trampling. (Lauzon)

Response: MTA NYCT will monitor conditions on the 7 platform and use crowd-control measures as needed. MTA NYCT does not forecast the need for additional staircases to handle anticipated crowding levels.
CANARSIE TUNNEL PROJECT

Independent of the temporary ASP, elements of the approved Canarsie Tunnel Project (Restoration and Resiliency, Core Capacity, and State of Good Repair projects) are under construction based on prior environmental approvals. This includes preparatory activities that must occur before the closure of the tunnel. The following comments were received on the Canarsie Tunnel Project during the public comment period on the ASP SEA. As these comments relate to a project independent of the ASP and, therefore, beyond the scope of the SEA, responses to these comments are not provided in this Response to Comments.

MTA NYCT continually invites public input and questions regarding the on-going construction of the Canarsie Tunnel Project and will separately address these comments as well as other future comments.

Comment 298. I understand that there is not going to be "L" train service between Rockaway Parkway and Broadway Junction on Saturday and Sunday, July 28th and July 29th. With the service change on the B42 due to construction on Glenwood Road and East 98th Street, where are the shuttle buses going to stop. They can't go into the terminal and you already have congestion on Rockaway Parkway with the current buses stopping outside the station. Also, will a transit representative be available for questions and directions. Can you get back to me before the end of the week. Thanks. (Bettman)

Comment 299. Noxious diesel fumes coming into apartments from generators on site. Equipment noise exceeding 122 decibels that is 25 feet from residences. Very noisy and disruptive work occurring weekday evenings until 10:30 pm last night. (Blair)

Comment 300. Very loud generator which is placed directly across/in front of our building door at 542 East 14 in use at 9:20 on a weekday night. Loud drill also in use in highly residential area. Non-emergency work which is extremely loud being done late in the evening. (Blair)

Comment 301. I live at 14th St and Ave B where work has been going on for 9 months for the substation being constructed on our corner. The MTA and Judlau Construction are violating DEP noise mitigation rules for residential areas. An inspection of the site would reveal over 15 pieces of machinery, such as drills, compressors, generators and pile drivers which have no noise abatement as required in DEP rules in Section 24-219 of the Administrative Code. Some machines measure over 110 decibels. Adjacent residents greatly affected by extreme level of noise from this site. (Blair)

Comment 302. I live at 14th and 1st, and I totally appreciate the fact that you guys are doing work to improve the trains. But it's 9:30 at night and the noise outside is unbearable, and it's been like this every night for a while. I was under the impression that there's a noise ordinance of some sort. This is really not cool, I can understand making noise during the day and such but this is ridiculous. (Chilton)

Comment 303. The air compressor and or generator equipment use up to 11 pm at night exceeds 130 decibels for 30 minutes at a time. audio levels from a six story apt window across the street ay 100 + feet are 97 decibels. Marcus Book of MTA does not respond to complaints regarding this. This is being reported to the EPA for inspection. (Ferguson)

Comment 304. This generator is polluting the residential neighborhood with diesel fumes and noise that is both dangerous to the workers and the neighborhood. We have documented the compressor at 125 decibels at 15 feet. Marcus Book at the MTA is aware of the dangers this poses to both workers and residents and is refusing to intervene. Marcus should be held personally and professionally accountable for the grave oversight. (Ferguson)

Comment 305. The contractor is operating diesel generators that exceed noise and pollution limits for neighborhood density. It is a detriment to health and well being. Must be investigated.
Comment 306. No reason for NYC MTA to be disturbing residents of East 14th and Sty Town with yearlong second shifts with heavy construction until 11 pm with 16 hour days. Floodlights. Diesel Fumes not monitored. Vibrations from pile drivers to century old tenements with no precautions in place. 120 DECIBEL COMPRESSORS!!! Hazardous working conditions. (Ferguson)

Comment 307. NOISE AND POLLUTION LEVELS ARE UNACCEPTABLE. YOU ARE BURNING A TRUCKLOAD OF DIESEL EVERY DAY. EVERYONE IS GETTING SICK. (Ferguson)

Comment 308. City planners often fail to take into consideration the actual lives of the people who will be subject to their plans. So is this to be Robert Moses all over again? Or will it be like the Farmers Market at Union Square, where the municipality yielded to the wishes of the people and, as a result, became equally responsible for creating one of the finest institutions in the city? (Meyers)

Comment 309. It seems that the MTA gives no consideration to subway riders and businesses that are dependent on subway riders. I just learned of L train service disruptions for 15 weekends between now and April. THIS IS RIDICULOUS! If you're planning to shut the whole system down for 15 months, why wouldn't you just add another month on the bid shutdown. That would be so much easier to deal with than 15 weekend closures. The MTA's planning and actions are so antithetical to about anyone's common sense. Maybe the MTA should create an advisory board of subway riders, and bounce ideas off people who actually need to use the system. It certainly couldn't hurt. (Miller)

Comment 310. Diesel fumes from generators are poisoning nearby residents and children. Please stop. Please use a safe alternative. Generators run all day long and soon all night long. STOP POISONING US!

End Judlau's permit for 24-hour work permit for weekdays, in addition to Saturday (11pm) and Sunday (6pm) work permits through 5/2019. Judlau is affecting residents quality of life. Nearby citizens are starting a class action lawsuit for dust and debris, quality of life, and diesel fumes poisoning and excessive noise and vibrations that cause buildings to shake. Citizens need to have sleep to be a productive employee and student. This is inhumane. (Oddo)

Comment 311. I live directly across the street from the pre-L train construction project run by Judlau construction at 542 E. 14th St. My comment is that we, The tenants of 14th St, have been suffering from medical problems relating to the excessive dust caused by the construction and also the diesel fuel in our air 16 hours a day, six days a week. We also just found out there is a permit for 24 hour Construction six days a week and also half a day on Sundays. I would like to know why we have not been relocated. This construction project—which we were not even notified of—showed up almost a year ago and has ruined not only our quality of life but now our health is at issue. I have lived in my apartment for 20+ years and have never been sick like this in my life. We are requesting to be relocated at the cost of the City of New York, the MTA and Judlau construction until this construction project has finished. (Pennline)

Comment 312. Extremely loud generators and compressors being used at 10pm. Noise is audible for 3 blocks. This noise is disturbing hundreds of apartments on 14th St, as well as Avenues B and A, and buildings within Stuyvesant Town. (P. Ryan)

Comment 313. I live at 542 E. 14th Street. The amount of noise and disruption being caused by the
Canarsie Tunnel Reconstruction Project between Avenues A and B has made this area untenable. I know of several health problems residents have been experiencing -- respiratory, sinus, heart palpitations, and a cardiac incident -- since the project has gotten fully underway. The constant dust rising from the site has been contributing to these problems, as the site is almost never washed down. This is against the law. I have recorded with a DecibelXPro decibel reader noise levels above 86.5 -- from my third-story window across the street from the site -- at 8PM. This is against the law. I have spoken with an official from the MTA at an "Open House" held at the Sol Goldman YMCA and was laughed at when I mentioned the noise problem (this official actually got on his phone and started texting someone in the middle of my second sentence to him; he then turned and walked away in the middle of a question I was asking about the construction project, and it was the neighborhood’s understanding that he was there to answer our questions). I have walked the perimeter of the site, in public areas designated for pedestrians, and have taken photographs and noise readings of the construction site and have been verbally harassed by two of the workers at the site for doing so. This is against the law. I have lived at this location for fifteen years. Residents of the area know full well that the amount of noise and dust and the general disregard for the quality of life of the people living around the Canarsie Tunnel Reconstruction Project would not be taking place if this project were underway in a more affluent part of the city. But while it may seem like the less affluent residences are the ones who are more easily beaten down and silenced into suffering unreasonable treatment, the opposite is true. The amount of problems for 14th Street residents that the city and Judlau are creating by the unconscionable disregard for those residents is surely going to turn into a similar amount of problems for the city and Judlau to contend with later. Apparently, the work hours might soon be extended to 24/7 and this is going to make the entire situation all the worse, given the way it’s been handled so far. The residents won’t stand for it. This treatment is a betrayal by the city of the residents who live and work and pay taxes here. At the very least, we at 542 E. 14th Street need double-pane, soundproof windows installed in order to contend with the constant noise and disruption and dust resulting from the ongoing construction work. Disregarding and destroying the quality of life of thousands of New York City residents is not acceptable and will not be tolerated. Reparations must be made. (P. Ryan)
D. Agency Correspondence

During the development of the proposed ASP and as described in the SEA, MTA NYCT coordinated with various local, state and federal agencies. Coordination with those agencies will continue throughout the construction and operation phases.

A summary of additional agency coordination and copies of agency correspondence submitted subsequent to the publication of the SEA is provided below.

United States Army Corps of Engineer

A Section 10 of Rivers and Harbor Act of 1889 permit application to the United States Army Corps of Engineer (USACE) for the construction of the temporary ferry service was transmitted to USACE on August 9, 2018. This was a joint permit application to New York State Department of Environmental Conservation (NYSDEC). NYCDEC is in receipt of the joint permit application made to the USACE.

New York State Department of State

On July 23, 2018, New York State Department of State (NYSDOS) issued a letter noting that the proposed ASP meets their general consistency concurrence criteria.

National Marine Fisheries Service

In a letter, dated August 23, 2018, the National Marine Fisheries Service (NMFS), an agency of National Oceanic and Atmospheric Administration (NOAA), provided concurrence on FTA’s conclusion that the proposed Project is not likely to adversely affect any NMFS Endangered Species Act (ESA) Species or designated critical habitat.

United States Coast Guard

In a letter, dated July 23, 2018, United States Coast Guard (USCG) Bridge Program offered comments related to any bridge improvements over any navigable waterway, including the East River.

New York City Economic Development Corporation

In a letter dated August 22, 2018, the New York City Economic Development Corporation (NYCEDC) concurred that use of Stuyvesant Cove Park is temporary and will not constitute a significant impact, and that a Section 4(f) de minimis impact finding is appropriate.

United States Department of Interior

FTA has coordinated with United States Department of Interior (DOI) regarding the use of the Union Square National Historic Landmark. The DOI notified FTA in a letter, dated August 9, 2018, that they have no comment on the project.
New York City Department of Parks and Recreation

In a letter dated September 4, 2018, the New York City Department of Parks and Recreation (NYCDPR) concurred that use of the North 5th Street Pier and Park is temporary, will not constitute a significant impact, and that a Section 4(f) *de minimis* impact finding is appropriate.

New York City Department of Transportation

In a letter dated August 27, 2018, NYCDOT provided its commitment to implement the ASP elements attributed to NYCDOT as described in the July 2018 SEA, provided that MTA NYCT assists NYCDOT with certain construction assistance described in the letter.
August 9, 2018

Ronald Pinzon
US Army Corps of Engineer
Eastern Permits Section
Floor 19
26 Federal Plaza
New York, NY 10278

Subject: MTA New York City Transit
North Williamsburg Temporary Ferry Service, Brooklyn, NY
Contract P-36437, Canarsie Tunnel Rehabilitation
Joint Application for Permit

Dear Mr. Pinzon:

The MTA New York City Transit (NYCT) submits the enclosed Joint Application for Permit package and requests permit authorization(s) from your office for installation and operation of the North Williamsburg Temporary Ferry Service on the East River within regulated waters of the United States.

The North Williamsburg Temporary Ferry Service has been developed as an element of the Alternative Service Plan (ASP) to provide subway riders affected by the upcoming suspension of L train service between Brooklyn and Manhattan and within Manhattan with alternative transportation options. L train service will be suspended on approximately April 13, 2019 for a period of fifteen (15) months which is needed to rehabilitate the Canarsie Tunnel damaged by Superstorm Sandy. Rehabilitation of the tunnel will not require in-water construction activities. The ASP includes a temporary ferry service between Empire Pier North Williamsburg, Brooklyn and the existing Stuyvesant Cove ferry landing, Manhattan.

NYCT is proposing to construct a temporary ferry landing adjoining the existing Empire Pier in the East River in North Williamsburg, Brooklyn, New York to implement this ferry service. Construction will begin on January 1, 2019 and will be completed on February 28, 2019. Operations will extend for approximately 15 to 16 months, commencing on or about March 16, 2019 and continuing through the duration of suspended L train service. The temporary ferry landing constructed for this project will be completely removed - and the temporary ferry service discontinued - upon completion of the tunnel rehabilitation, in approximately July 2020.

The proposed Empire Pier ferry landing will accommodate one passenger ferry boat with a capacity equal or similar to the NYCEDC passenger ferry vessels currently using the nearby landing immediately south of Empire Pier. The proposed temporary Empire Pier ferry landing will
consist of an access platform, a gangway, ferry landing barge, and guide piles with donut fenders. The access platform will be connected to the existing Empire Pier, will be supported by four (4), 16-inch diameter steel piles and will provide access to the ferry landing barge. The ferry landing barge will be supported by six (6) 36-inch diameter steel anchor piles. Four (4), 36-inch diameter steel guide piles with donut fenders will be located north of the ferry landing to guide the ferry as it approaches the landing. The constructed project footprint will be approximately 0.1033 acre, which includes 0.0018 acre associated with piles, and 0.1015 acre associated with the supported landing and access platforms.

The Canarsie Tunnel rehabilitation is a priority project of NYCT's continuing response to the damage caused by Superstorm Sandy. The Project is federally funded by the Federal Transit Administration (FTA), and an Environmental Assessment for the ASP component of the Project has been prepared pursuant to the National Environmental Policy Act (NEPA).

A copy of this permit application has also been forwarded to Steve Watts of NYSDEC, and Jennifer Street of the New York State Department of State.

We appreciate your attention to this vital NYCT infrastructure protection project.

Should you have any questions please contact me at 646-252-3608 or Andrea Rosenthal of WSP at 212-465-5228. Thank you.

Very truly yours,

Angelo Elmi, P.E.

Principal Environmental Engineer, New York City Transit

cc:
Steve Watts, NYSDEC w/encl.
Jennifer Street, NYSNOS w/encl.
N. Chung, FTA
D. Pollack, MTA
L. Oliva, MTA
J. Ehrlich, NYCT
Edmund Gbanite, NYCT
D. Braithwaite, NYCT
To Whom It May Concern:

The New York District, Corps of Engineers has received an application for a Department of the Army permit pursuant to Section 10 of the Rivers and Harbors Act of 1899 (33 U.S.C. 403).

APPLICANT: Metropolitan Transit Authority New York City Transit
2 Broadway
New York, NY 10004

WATERWAY: East River

LOCATION: Seaward of the existing Empire Pier, between North 5th and North 6th Streets, Borough of Brooklyn, Kings County, City of New York, New York

ACTIVITY: Installation of a temporary ferry landing

A detailed description and plans of the applicant’s activity are enclosed to assist in your review.

The decision whether to issue a permit will be based on an evaluation of the probable impact including cumulative impacts of the proposed activity on the public interest. That decision will reflect the national concern for both protection and utilization of important resources. The benefit which reasonably may be expected to accrue from the proposal must be balanced against its reasonably foreseeable detriments. All factors which may be relevant to the proposal will be considered including the cumulative effects thereof; among those are conservation, economics, aesthetics, general environmental concerns, wetlands, historic properties, fish and wildlife values, flood hazards, floodplain values, land use, navigation, shoreline erosion and accretion, recreation, water supply and conservation, water quality, energy needs, safety, food and fiber production, mineral needs, considerations of property ownership and, in general, the needs and welfare of the people.

The Corps of Engineers is soliciting comments from the public; Federal, state, and local agencies and officials; Indian Tribes; and other interested parties in order to consider and evaluate the impacts of this proposed activity. Any comments received will be considered by the Corps of Engineers to determine whether to issue, modify, condition or deny a permit for this proposal. To make this decision, comments are used to assess impacts on endangered species, historic properties, water quality, general environmental effects, and the other public interest factors listed above. Comments are used in preparation of an Environmental Assessment and/or an Environmental Impact Statement pursuant to the National Environmental Policy Act. Comments are also used to determine the need for a public hearing and to determine the overall public interest of the proposed activity.

ALL COMMENTS REGARDING THE PERMIT APPLICATION MUST BE PREPARED IN WRITING AND MAILED TO REACH THIS OFFICE BEFORE THE EXPIRATION DATE OF THIS NOTICE, otherwise, it will be presumed that there are no objections to the activity.

Comments submitted in response to this notice will be fully considered during the public interest review for this permit application. Comments provided will become part of the public record for this
permit application. All written comments, including contact information, will be made a part of the administrative record, available to the public under the Freedom of Information Act. The Administrative Record, or portions thereof, may also be posted on a Corps of Engineers internet web site. Due to resource limitations, this office will normally not acknowledge the receipt of comments or respond to individual letters of comment.

Any person may request, in writing, before this public notice expires, that a public hearing be held to collect information necessary to consider this application. Requests for public hearings shall state, with particularity, the reasons why a public hearing should be held. It should be noted that information submitted by mail is considered just as carefully in the permit decision process and bears the same weight as that furnished at a public hearing.

Our preliminary determination is that the activity for which authorization is sought herein is not likely to adversely affect any Federally endangered or threatened species or their critical habitat. However, pursuant to Section 7 of the Endangered Species Act (16 U.S.C. 1531), the applicant has completed consultation with the appropriate Federal agency to determine the presence of and potential impacts to listed species in the project area or their critical habitat and conservation recommendations have been provided to this office which will be considered as part of the final decision.

The Magnuson-Stevens Fishery Conservation and Management Act, as amended by the Sustainable Fisheries Act (Public Law 104-267), requires all Federal agencies to consult with the National Oceanic and Atmospheric Administration Fisheries Service (NOAA/FS) on all actions, or proposed actions, permitted, funded, or undertaken by the agency, that may adversely affect Essential Fish Habitat (EFH). The proposed work, fully described in the attached work description, could cause the disruption of habitat for various life stages of some EFH-designated species as a result of a temporary increase in turbidity, noise and vibrations during construction. New York District has made the preliminary determination that the site-specific adverse effects are not likely to be substantial because it is expected that fish populations would avoid the small area of disturbance. However, the applicant has completed consultation with NOAA/FS regarding EFH impacts and NOAA/FS has provided conservation recommendations to this office which will be considered as part of the final decision.

Based upon a review of the latest published version of the National Register of Historic Places, there are no known sites eligible for, or included in, the Register within the permit area. Presently unknown archeological, scientific, prehistorical, or historical data may be lost by work accomplished under the required permit.

Pursuant to Section 307 (c) of the Coastal Zone Management Act of 1972 as amended [16 U.S.C. 1456 (c)], for activities under consideration that are located within the coastal zone of a state which has a federally approved coastal zone management program, the applicant has certified in the permit application that the activity complies with, and will be conducted in a manner that is consistent with, the approved state coastal zone management program. By this public notice, we are requesting the state's concurrence with, objection to, or waiver of the applicant's certification. No permit decision will be made until one of these actions occur. For activities within the coastal zone of New York State, the applicant's certification and accompanying information is available from the Consistency Coordinator, New York State Department of State, Division of Coastal Resources and Waterfront Revitalization, Coastal Zone Management Program, One Commerce Plaza, 99 Washington Avenue, Albany, New York 12231, Telephone (518) 474-6000. Comments regarding the applicant's certification, and copies of any letters to this office commenting upon this proposal, should be so addressed.
CENAN-OP-RE
PUBLIC NOTICE NO. NAN-2018-01090-EBR

In addition to any required water quality certificate and coastal zone management program concurrence, the applicant has obtained or requested the following governmental authorization for the activity under consideration:

- New York State Department of Environmental Conservation
- New York State Department of State

It is requested that you communicate the foregoing information concerning the activity to any persons known by you to be interested and who did not receive a copy of this notice. If you have any questions concerning this application, you may contact this office at (917) 790-8516 and ask for William Bruno.


For more information on New York District Corps of Engineers programs, visit our website at http://www.nan.usace.army.mil.

 filtration

For and In behalf of

Stephan A. Ryba
Chief, Regulatory Branch

Enclosures
CENAN-OP-RE
PUBLIC NOTICE NO. NAN-2018-01090-EBR

WORK DESCRIPTION

The applicant, Metropolitan Transit Authority New York City Transit, has requested Department of the Army authorization to install a temporary ferry landing. The project is located in the East River seaward of the existing Empire Pier, between North 5th and North 6th Streets, Borough of Brooklyn, Kings County, City of New York, New York.

The applicant proposes, approximately 57 feet from the terminus of the north side of the existing Empire Pier, the installation of a trapezoid-shaped fixed access platform, 18-foot-wide by 6-foot-long on the south side of the fixed access platform and 17-foot-long on the north side fixed access platform, supported by four (4) 16-inch-diameter steel piles leading to a 10-foot-wide by 80-foot-long gangway and a 35-foot-wide by 120-foot-long floating ferry landing, supported by six (6) 36-inch-diameter steel anchor piles. Also proposed are four (4) 36-inch-diameter steel donut fender piles.

The proposed ferry landing is to be installed between January 1, 2019 and February 28, 2019 and removed by July 31, 2020.

The stated purpose of this project is to provide an alternative public transit option for commuters between the Boroughs of Brooklyn and Manhattan during the proposed shutdown of the Canarsie Tunnels which the L-subway line runs through.
MTA New York City Transit
Canarsie Tunnel Rehabilitation Project
North Williamsburg Temporary Ferry Landing
North Williamsburg, Brooklyn
Kings County, New York
ASGECI Project # 4303

Legend

- Proposed Temporary Ferry Landing
- Proposed 16" Piles
- Proposed 36" Piles
- Project Action Area

Source:
Proposed Temporary Ferry Landing and Proposed Piles provided by New York City Transit Authority, Preliminary Proposed Ferry Landing Plan, Sheet FL-2 (Figure 2 Plan), April 13, 2018.
1. HYDROGRAPHIC INFORMATION AND SURVEY DATA SHOWN ARE APPROXIMATE, OPERATOR SHALL SURVEY AND VERIFY EXISTING FIELD CONDITIONS AND MUDLINES.

2. ELEVATIONS SHOWN REFERENCE BROOKLYN HIGHWAY DATUM (BHD)
**NAN-2018-01090-EBR**

**GANGWAY SLOPE**

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**RANGE OF MOTION**

**SCALE**: 3/6" = 1'-0"

**TIDAL DATA**

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**NOTES:**

1. **ELEVATIONS SHOWN REFER TO BHD.**
2. **BARGE DECK ELEMENTS AND ANCHOR PILES NOT SHOWN FOR CLARITY**
3. **THE OPERATOR SHALL BE RESPONSIBLE FOR SELECTION OF TEMPORARY BARGE AND PROVIDE DESIGN ACCORDINGLY.**

**NOTES:**

1. **TIDAL DATA TAKEN FROM NOAA TIDAL LEVEL BENCHMARKS AT THE BATTERY, NY - STATION 8518750 (PRESENT EPOCH 1985-2001).**
2. **ELEVATIONS SHOWN IN FEET.**

*Page 6 of 10*
LEGEND

1. PILE NUMBER
   - PROPOSED 36" (MIN.) x ¾" (MIN.) WALL STEEL PIPE PILE WITH DONUT FENDER
   - PROPOSED 36" (MIN.) x ¾" (MIN.) WALL STEEL PIPE ANCHOR PILE
   - PROPOSED 10" x 3/4" WALL STEEL PIPE ACCESS PLATFORM PILE

PROPOSED PILE PLAN

SCALE: 1" = 50'-0"

NOTES:
1. ELEVATIONS SHOWN REFERENCE BROOKLYN HIGHWAY DATUM (BHD)
2. HYDROGRAPHIC INFORMATION AND SURVEY DATA SHOWN ARE APPROXIMATE.
   THE OPERATOR SHALL SURVEY AND VERIFY EXISTING CONDITIONS.
3. PILE CONFIGURATION SHOWN ON THIS DRAWING IS BASED ON A 130' X 35'
   BARGE WITH 4FT DRAFT AND 7FT FADDEBOARD FOR PERMITTING PURPOSE.
4. LENGTH OF BARGE SELECTED WILL DETERMINE DIMENSION BETWEEN
   PILES: INSTALL PILES WITH 3 EQUAL SPACES FROM PILE 1 TO PILE 6.
5. THE OPERATOR SHALL PERFORM SUBSURFACE INVESTIGATION AND SURVEY,
   NEEDED FOR DESIGN OF PILE FOUNDATIONS.
1. The pile foundations shown shall be designed by the operator. The operator shall perform subsurface investigation and hydrographic survey to confirm actual condition based on his selection of temporary barge location and dimensions.

2. Pile cutoff elevations for the anchor piles and monopiles shall provide for adequate clearance for the barge and fenders to remain in place during extreme storm surges and weather events.

Notes:

- The closest pile shall be minimum 60° away from MTA property line to protect damage to Canarsie Tunnel.
- 38" dia. (min.) x 0.75" (min.) wall, open ended anchor pipe pile.
- Approx. limits of Canarsie Tunnels.
NOTES:

1. THE PILE FOUNDATIONS SHOWN SHALL BE DESIGNED BY OPERATOR. THE OPERATOR SHALL PERFORM SUBSURFACE INVESTIGATION AND HYDROGRAPHIC SURVEY TO CONFIRM ACTUAL CONDITION BASED ON HIS SELECTION OF TEMPORARY BARGE LOCATION AND DIMENSIONS.

2. PILE CUTOFF ELEVATIONS FOR THE ANCHOR PILES AND MONOFILERS SHALL PROVIDE FOR ADEQUATE CLEARANCE FOR THE BARGE AND FENDERS TO REMAIN IN PLACE DURING EXTREME STORM SURGES AND WEATHER EVENTS.

THE CLOSET PILE SHALL BE MINIMUM 60' AWAY FROM MTA PROPERTY LINE TO PROTECT DAMAGE TO CANARSIE TUNNEL.

36" DIA. (MIN.) X 0.75" (MIN.) WALL-OPEN ENDED PIPE PILE WITH DONUT FENDER.

APPROX. LIMITS OF CANARSIE TUNNELS.
Legend:

* Ferry Landings
- Proposed Route

Figure D-12

PROJECT TITLE:
CANARSIE FERRY
PROPOSED FERRY ROUTE
LOCATION MAP

Page 10 of 10
July 23, 2018

Mr. Angelo Almi, P.E.
Project Engineer
MTA - New York City Transit
2 Broadway
New York, New York 10004

Re: F-2015-0520(FA)
MTA/NYC Transit – use of Federal Transit Administration (FTA) funds for the Canarsie L Line Improvement - Infrastructure improvements to increase service capacity on the Canarsie L Line of the New York City subway system.

General Concurrence - No Objection to Funding - Modification of a Previously Reviewed Activity

Dear Mr. Almi:

The Department of State received the proposed modification you submitted regarding the above matter on 7/10/2018.

The proposed modification involves the following:

(i) a temporary bus terminal on an existing parking lot (resurfacing the current lot) at Stuyvesant Cove, between East 20th and East 23rd Streets in Manhattan;
(ii) construction of a temporary ferry landing at Empire Pier in North Williamsburg, Brooklyn for service to and from Stuyvesant Cove in Manhattan (federal consistency review for necessary permits to be under separate cover); and
(iii) bus parking on an existing parking lot (resurfacing the current lot) at 46-81 Metropolitan Ave, Maspeth, Queens. These temporary structures and facilities are scheduled to be removed shortly after the L train service resumes in 2020.

The Department of State has determined that this proposal meets the Department’s general consistency concurrence criteria. Therefore, the Department of State has no objection to the use of Federal Transit Administration funds for this financial assistance activity. This concurrence pertains to the financial assistance activity for this project only. If federal permits or other form of federal agency authorization is required for this activity, the Department of State will conduct a separate review for those permit activities. In such a case, please forward a copy of the federal application for authorization, a completed Federal Consistency Assessment Form, and all supporting information to the Department at the same time it is submitted to the federal agency from which the necessary authorization is requested.
When communicating with us regarding this matter, please contact us at (518) 474-6000 and refer to our file #F-2015-0520(FA).

Sincerely,

[Signature]

Gregory Capobianco
Office of Planning and Development

GC/jls
Re: MTA New York City Transit Canarsie Tunnel Project (Temporary Passenger Ferry Service), Brooklyn, New York

Dear Mr. Goodman:

We have completed our consultation under section 7 of the Endangered Species Act (ESA) in response to your letter received August 16, 2018, regarding the above-referenced proposed project. We reviewed your consultation request document and related materials. Based on our knowledge and expertise, we concur with your conclusion that the proposed action is not likely to adversely affect any National Marine Fisheries Service (NMFS) ESA-listed species or designated critical habitat. Therefore, no further consultation pursuant to section 7 of the ESA is required.

Reinitiation of consultation is required and shall be requested by the Federal agency or by us, where discretionary Federal involvement or control over the action has been retained or is authorized by law and: (a) If new information reveals effects of the action that may affect listed species or critical habitat in a manner or to an extent not previously considered in the consultation; (b) If the identified action is subsequently modified in a manner that causes an effect to the listed species or critical habitat that was not considered in this consultation; or (c) If a new species is listed or critical habitat designated that may be affected by the identified action. No take is anticipated or exempted. If there is any incidental take of a listed species, reinitiation would be required. Should you have any questions about this correspondence please contact Edith Carson-Supino at (978) 282-8490 or by email (Edith.Carson@noaa.gov). For questions related to Essential Fish Habitat, please contact Ursula Howson with our Habitat Conservation Division at 732-872-3116 or Ursula.Howson@noaa.gov.

Sincerely,

Jennifer Anderson
Acting Assistant Regional Administrator
for Protected Resources

EC: Howson, NMFS/HCD; Moser, FTA; PCTS: NER-2018-15004
File Code: \\FHWA_State DOTS\Informals\NY DOT2018\FTA NYC Transit Canarsie Tunnel Project East
Mr. Dan Moser  
Regional Administrator  
Federal Transit Administration  
Region II  
One Bowling Green, Rm 428  
New York, NY 10004-1415

Dear Mr. Moser,

This responds to request for comments regarding the MTA New York City Transit Canarsie Tunnel Project—Supplemental Environmental Assessment and Section 4(f) Review dated July 2018. The U. S. Coast Guard (USCG) Bridge Program has reviewed the document and offers the following comments:

1. **Approved Project**  
   Should any work related to bridge improvements over the East River or any other navigable waterway be conducted, to ensure that the needs of marine navigation are considered during construction, it is imperative that we continue to be included in construction planning and scheduling.

2. I have attached the USCG Bridge Administration – General Construction Requirements for your reference should any work above or on a navigable waterway be necessary.

Thank you for the opportunity to comment on the MTA New York City Transit Canarsie Tunnel Project. Please contact me at the above telephone number or at christopher.j.bisignano@uscg.mil if you have any questions.

Sincerely,

\[Signature\]

C. J. BISIGNANO  
Supervisory Bridge Management Specialist  
U.S. Coast Guard  
By direction

Enclosures (1)  
Copy: 1) CG SECNY (www)
August 22, 2018

Mr. Donald Burns, AICP
Federal Transit Administration
One Bowling Green, Room 428
New York, NY 10004

Re: Section 4(f) de minimis Concurrence
Canarsie Tunnel Project/ Stuyvesant Cove Park

Dear Mr. Burns:

The New York City Economic Development Corporation (NYCEDC) was informed by FTA of its intent to make a section 4(f) de minimis impact finding for the temporary use of Stuyvesant Cove Park, a NYCEDC-managed property.

New York City Transit (NYCT) has coordinated with the NYCEDC regarding plans to allow access through Stuyvesant Cove Park in Manhattan to create a direct connection between NYCT's temporary ferry service and temporary bus terminal. The proposed ferry service and bus terminal are part of the Alternative Service Plan (ASP), which is proposed as part of the Canarsie Tunnel Project. The proposed temporary ferry service will utilize the existing Stuyvesant Cove Ferry Landing operated by NYCEDC. The proposed temporary bus terminal will utilize a parking lot under the FDR Drive (between Ave C & E 20th Street), adjacent to the park. Passengers will have to walk through Stuyvesant Cove Park to directly access the proposed ferry and bus terminal.

Project Scope & Impacts

The temporary ferry service is proposed to operate for approximately 16 months. During this timeframe, a total of approximately 7,000 ft² of the 82,764 ft² property will be temporarily impacted to accommodate the new ferry access paths (paved asphalt) and ticketing machines—7,000 ft² for the path and 12 ft² for the ticketing machines. Ticketing services will be installed in the form of MTA SBS ticket transfer machines adjacent to the path. The proposed area to be modified will be small in comparison to the overall size of the park. All temporary modifications will be removed at the end of the proposed ASP, and the site will be restored to an agreed-upon condition at the end of the proposed ASP.

Other temporary effects of the temporary ferry service include pedestrian traffic from a maximum of 1,192 patrons for each peak hour accessing the park to use the ferry, the removal of a bench and tree, and the relocation of one garbage can. Please note that while the July 2018 Supplemental Environmental Assessment and Section 4(f) Review (SEA) for the Canarsie Tunnel Project did not mention the removal of tree and bench, and relocation of one garbage can, plans were later modified in coordination with NYCEDC to create the most direct connection to the ferry. This addition to the plans does not increase the area of the park that would be affected and does not change the conclusions of the aforementioned SEA.
NYCEDC concurs with the SEA finding that the proposed temporary alterations would be consistent with the existing uses and would not affect the public’s use of these properties or result in the impairment of their recreational features or the ability of users to access the park. NYCEDC understands that during the operation of the ferry service, best management practices such as queue management, signage and coordination with other ferry operators will be utilized to limit temporary impacts. Noise and vibration impacts from the construction of access to the landing or installation of ticketing machines will be limited by local laws.

Stakeholder Coordination

NYCT has successfully coordinated with NYCEDC regarding any impacts to Stuyvesant Cove Park. Public notice and opportunity for public review and comment concerning the effects on the park was made available as part of the public review of the SEA between July 20, 2018 and August 19, 2018. During the public comment period, one member of the public expressed concern over the extent of the modifications to Stuyvesant Cove Park. As discussed in the SEA and reiterated above, the proposed ferry service will require only minor physical changes to Stuyvesant Cove Park. The ferry landing to be used for the ASP is already in place and is currently being used for NYCF service. All temporary SBS bus operations would be located below the FDR viaduct, adjacent to the park; a temporary walkway connecting this bus terminal with the main walkway providing access to the ferry terminal. As discussed in the SEA and above, the increase in pedestrian traffic is not expected to impact the existing park.

Based on the temporary and minor nature of the impacts to the park and consideration of public comments, NYCEDC concurs that a de minimis impact finding is appropriate regarding the Stuyvesant Cove Park. If you have any immediate questions, please contact me at 212-312-3688 or jwong@edc.nyc.

Sincerely,

James Wong, AICP
Executive Director, NYC Ferry Division

New York City Economic Development Corporation
Daniel Moser  
Federal Transit Administration  
One Bowling Green, Room 428  
New York, NY 10004

Subject: Section 106 Finding and Section 4(f) Evaluation  
Canarsie Tunnel Project  
New York, New York.

Dear Mr. Moser:

The U.S. Department of the Interior (Department) has reviewed the MTA New York City Canarsie Tunnel Project Section 106 Finding and Section 4 (f) Evaluation. The Department has no comment on the project.

Thank you for the opportunity to review and comment on this project. Please contact me at (617) 223-8565 if I can be of assistance.

Sincerely,

Andrew L. Raddant  
Regional Environmental Officer
September 4, 2018

Mr. Donald Burns, AICP
Federal Transit Administration
One Bowling Green, Room 428
New York, NY 10004

Re: Section 4(f) de minimis Concurrence
Canarsie Tunnel Project/ North 5th Street Pier and Park

Dear Mr. Burns:

The New York City Department of Parks and Recreation (NYC Parks) was informed by FTA of its intent to make a Section 4(f) de minimis impact finding for the temporary use of the North 5th Street Pier and Park, a NYC Parks property.

New York City Transit (NYCT) has coordinated with the NYC Parks and New York City Economic Development Corporation regarding NYCT’s plans to construct a temporary ferry landing and operate temporary ferry service on the existing Empire Pier in Brooklyn, NY, a city-owned facility that will be under NYC Parks jurisdiction in the near future. The proposed ferry service is part of the Alternate Service Plan (ASP), which is proposed as part of the Canarsie Tunnel Project. Ferry passengers will have to walk through the North 5th Street Pier and Park to access the proposed ferry landing.

**PROJECT SCOPE & IMPACTS**

The temporary ferry services are proposed to operate for approximately 15 months. During this timeframe, a total of approximately 68 square feet will be temporarily impacted by the ferry landing connection to Empire Pier (40 square feet) and ticket machines (28 square feet). Please note that while the July 2018 Supplemental Environmental Assessment and Section 4(f) review (SEA) for the Canarsie Tunnel Project identified the North 5th Street Pier and Park as 1.17 acres (or 51,000 square feet), the correct figure is 47,026 square feet (37,026 square feet of existing parkland plus approximately 10,000 square feet for the Empire Pier, which will be under NYC Parks jurisdiction in the near future).

Temporary modifications on the North 5th Street Pier and Park include temporary installation of seven ticket machines with a total area of 28 square feet. Other temporary impacts include a ferry service with a minimum capacity of 1,192 patrons for each peak hour accessing the park to use the ferry, a cut in the existing guard rail on the Empire Pier to accommodate the ferry landing connection, and an extension of park access for ferry service customers to pass through when taking the ferry after normal park hours.

The proposed area to be modified will be small in comparison to the overall size of North 5th Street Pier and Park. All temporary infrastructure will be removed at the end of the proposed ASP, and the site will be restored to an agreed-upon condition with photo documentation of conditions of park to be done by NYCT before the commencement of the operations. Estimated start date of temporary service is April 2019.
During the operation of the ferry service, best management practices will be utilized to limit temporary impacts. Noise and vibration impacts will be limited by local laws. NYCT will also be providing $498,862 in funds to NYC Parks to enable the addition of NYC Parks personnel at the North 5th Street Pier and Park to manage the increase in usership and provide for necessary security due to the increase in the park hours during the ferry service operations. NYCT will continue to work with NYC Parks regarding customer queuing impacts, ticket machine placement, and should additional costs associated for security and maintenance at the site be deemed necessary.

**STAKEHOLDER COORDINATION**

NYCT has successfully coordinated with NYC Parks regarding any impacts to North 5th Street Pier and Park. Public notice and an opportunity for public review and comment concerning the effects on the park was made available as part of the public review of the SEA between July 20, 2018 and August 19, 2018. No comments about the potential impacts to the park were received during the public comment period.

Therefore, based on the temporary and minor nature of the impacts to North 5th Street Pier and Park, the funding assistance to NYC Parks for the addition of NYC Parks personnel, and no public comments received on impacts to this park, NYC Parks states that a *de minimis* impact finding is appropriate regarding the North 5th Street Pier and Park. If you have any immediate questions, please contact Brendan Shera, in NYC Parks’s Interagency Coordination Unit at 718-760-6622 or Brendan.Shera@parks.nyc.gov.

Sincerely,

Alyssa Cobb Konon
Deputy Commissioner for Planning and Development
August 27, 2018

President Andy Byford
MTA New York City Transit
2 Broadway
New York, NY 10004

Dear President Byford:

We understand that the Federal Transit Administration (FTA) has requested that the New York City Department of Transportation (DOT) submit to MTA New York City Transit (MTA NYCT) a letter affirming DOT's commitment to supporting the Alternative Service Plan (ASP) as detailed within the Supplemental Environmental Assessment (SEA) document.

As you know, DOT staff have been working closely with MTA NYCT staff to help develop the ASP for the L Train Canarsie Tunnel closure, in order to provide travel options to displaced transit passengers during the closure.

DOT expects MTA NYCT to implement the transit service elements as detailed in the ASP. In support of all of the work MTA NYCT is committed to in the ASP, DOT will implement the projects attributed to DOT in the SEA document, assuming MTA NYCT successfully provides the critical construction assistance MTA NYCT has agreed to undertake.

Sincerely,

Polly Trottenberg
Commissioner
New York City Department of Transportation

cc: Lhota, Joseph
Hakim, Veronique
Mulligan, Tim
Cafiero, Peter
FINDING OF NO SIGNIFICANT IMPACT

ATTACHMENT B: Revised Measures to Minimize Harm

Project: Alternative Service Plan for the Canarsie Tunnel Project
Project Sponsor: Metropolitan Transportation Authority New York City Transit
Project Location: New York City, New York
ATTACHMENT B: REVISED MEASURES TO MINIMIZE HARM

The Measures to Minimize Harm presented in Chapter 8 of the Supplementary Environmental Assessment and Section 4(f) Review (SEA), dated July 2018, have been revised based on further project development since the publication of the SEA and based on FTA’s review of agency and public comments received on the SEA. FTA and MTA NYCT have updated the Measures to Minimize Harm accordingly, outline them below, and have incorporated them into the Proposed Action.

Proposed Action – Removal of all temporary ASP elements

- After reconstruction of the tunnel is complete and L train service resumes, MTA NYCT, in coordination with NYCDOT, will ensure removal of all temporary ASP elements within approximately four months of the re-opening of the tunnel (or as weather conditions permit), unless additional planning, agency coordination, public outreach, and/or appropriate environmental analysis is undertaken as part of separate independent project(s).

The following permanent elements would remain in place:

- station circulation improvements at Nassau St (G Line), Metropolitan Av (G Line), Lorimer St (L Line), and Hewes St (J/M/Z Lines);
- roadway resurfacing; and
- potentially fare machine/totems on 14th Street.

The fare machines and totems may be evaluated at a later point as part of a permanent M14SBS route that would be separate and independent of the M14SBS implemented as part of the ASP should MTA and NYCDOT decide to undertake a permanent project. However, if they are not used for the permanent M14SBS, they will be removed within approximately four months of completion of the ASP.

Transportation

- MTA NYCT will commit to operating subway service on alternate subway lines in the robust service pattern described in the SEA so that as many diverted L train customers can be accommodated within the subway system as possible, to ensure that the effect of the Proposed Action on traffic flow is not significant.

- Camera enforcement of bus lanes will be implemented on 14th Street and Grand Street to ensure bus lanes function efficiently. Please note that this measure was not presented in the SEA, and numerous public comments regarding support of camera enforcement were received.

- Once the proposed ASP is implemented, MTA NYCT, in coordination with NYCDOT, will monitor traffic conditions in a dynamic and responsive manner. This includes potentially adjusting traffic approaches and adjusting restriction times on Williamsburg
Bridge and on 14th Street, as well as other adjustments as needed, to optimize performance during the anticipated 15-month construction schedule to minimize impacts.

- MTA NYCT will coordinate with NYCDOT to adhere to all local, state and federal requirements related to the reconfiguration of the surface transportation infrastructure; monitor and ensure that all elements of the ASP are functioning as intended and to maintain the elements of the ASP as needed; and enforce traffic rules and new traffic patterns.

- MTA NYCT will work with NYCDOT to ensure that NYCDOT’s Freight Mobility Group continues its regular, ongoing outreach to representatives of the trucking industry to educate commercial drivers of their appropriate route options. Trucks diverted off of 14th Street due to the busway will need to find other permitted routes north or south of the corridor and use that route to get as close as possible to their delivery location. This is also a measure to minimize air quality impacts.

- MTA NYCT, in coordination with NYCDOT, will notify the NYPD Transportation Division’s Truck Enforcement Unit of proposed routing changes associated with the ASP and coordinate with them on education and enforcement events. This is also a measure to minimize air quality impacts.

- MTA NYCT, in coordination with NYCDOT, will work with the NYPD on enforcement of traffic regulations. This measure was added as a result of public comments received for the SEA.

Air Quality

- MTA NYCT’s supplemental bus fleet will include 20 electric buses (15 to be deployed by the fall of 2019 on the M14 SBS route and 5 to be deployed at the start of the ASP in April 2019 on the Brooklyn-based inter-borough bus routes), and 10 hybrid-electric buses in addition to the diesel bus fleet on the Brooklyn-based inter-borough bus routes.

- MTA NYCT will work with NYCDOT to ensure that NYCDOT’s Freight Mobility Group continues its regular, ongoing outreach to representatives of the trucking industry to educate commercial drivers of their appropriate route options. Trucks diverted off 14th Street due to the busway will need to find other permitted routes north or south of the corridor and use that route to get as close as possible to their delivery location. This is also a measure to minimize transportation impacts.

- MTA NYCT, in coordination with NYCDOT, will notify the NYPD Transportation Division’s Truck Enforcement Unit of proposed routing changes associated with the ASP and coordinate with them on education and enforcement events. This is also a measure to minimize transportation impacts.

Biological Resources

- MTA NYCT will adhere to the recommendations of NOAA as required through any applicable USACE permit(s) related to in-water work. NOAA made the following recommendations to be undertaken during construction and removal of the temporary ferry landings:
i) The temporary barge should float at all stages of the tide.
ii) Piles should be vibrated out to the extent possible. A vibratory hammer for pile installation is preferred. If an impact hammer is used, soft starts and a wooden block should be used to buffer the noise and vibrations during hammering.
iii) Best Management Practices (BMPs) should be employed to ensure turbidity is minimized in the water.
iv) Efforts should be made to ensure no construction materials or debris enter the waterway.

**Hazardous Materials**

- MTA NYCT will develop and implement a Construction Health and Safety Plan to avoid exposure of workers and the public to any hazardous materials during construction.

- MTA NYCT will abide by the regulations and requirements set forth by the NYSDEC for the management and removal of hazardous materials.

**Historic, Cultural and Archaeological Resources**

- MTA NYCT will develop, in coordination with the SHPO, and implement a Construction Protection Procedure requiring protection of all adjacent historical resources during construction.

- Technical Policy and Procedure Notice #: 10/88 from the NYC DOB for construction adjacent to historic structures will be utilized for all work within 90 feet of historical resources or within historic districts to protect these resources.

**Noise and Vibration**

- MTA NYCT will adhere to the New York City Noise Control Code to minimize construction noise and vibration impacts.

- MTA NYCT, in coordination with NYCDOT, will maintain the roadways per agency standards to prevent large potholes or other poor pavement conditions to minimize vibration impacts.

- MTA NYCT, in coordination with NYCDOT, will work with the NYPD to manage truck traffic diverted from 14th Street due to the busway restrictions.

**Social Resources and Economic Impact**

- Access to any community facilities and services within the affected areas will be maintained.

- Temporary street treatments and operational restrictions will allow for travel by emergency response vehicles at all times to ensure public services are not adversely impacted.
Attachment B: Revised Measures to Minimize Harm
Alternative Service Plan for the Canarsie Tunnel Project
Finding of No Significant Impact

- Although non-emergency vehicles will be restricted on the M14 SBS blocks of 14th Street, commercial and residential activities (including local deliveries and passenger pick-up and drop-off) along 14th Street will remain in place with the proposed ASP in order to minimize disruption to businesses and residents along the corridor.

Water Resources

Measures to minimize harm to water resources are the same measures identified under Biological Resources, presented above.

Construction

- MTA NYCT, in coordination with NYCDOT and contractors, will follow best management practices, AASHTO guidelines, and adhere to the NYC Noise Code to minimize impacts during construction.

- MTA NYCT will adhere to permitting requirements for the construction of the ferry landing at North Williamsburg to ensure no significant adverse impacts to biological and water resources during construction activities.

Section 4(f)

- MTA NYCT will continue to coordinate with NYCEDC and NYCDPR regarding the temporary use of areas of public parks or recreational areas. After the 15-month ASP service is complete, MTA NYCT will restore the North 5th Street Pier and Park and Stuyvesant Cove Park to agreed-upon conditions.
FINDING OF NO SIGNIFICANT IMPACT

ATTACHMENT C: Modifications, Clarifications and Errata Sheet

Project: Alternative Service Plan for the Canarsie Tunnel Project
Project Sponsor: Metropolitan Transportation Authority New York City Transit
Project Location: New York City, New York
ATTACHMENT C: MODIFICATIONS, CLARIFICATIONS, AND ERRATA SHEET

This table provides a summary of clarifications and corrections to text presented in the Supplemental Environmental Assessment (SEA); these are noted as “E” or Errata. This table also provides a summary of modifications made as a result of Project Development since the publication of the SEA; these are noted as “D” or Project Development.

<table>
<thead>
<tr>
<th>SEA Section and Page Number</th>
<th>SEA Text</th>
<th>Modifications, Clarifications, and Errata</th>
<th>E</th>
<th>D</th>
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<tbody>
<tr>
<td><strong>Executive Summary</strong></td>
<td></td>
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<tr>
<td>1</td>
<td>Table ES-1: Parking Page VI</td>
<td>The proposed ASP would result in temporary displacement of approximately 970 on-street and 220 off-street parking spaces.</td>
<td></td>
<td>✓</td>
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<td>The number of on-street parking spaces that would be temporarily removed is now estimated at 1,075 spaces.</td>
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<td>2</td>
<td>Table ES-1: Social Resources and Economic Impact Page VIII</td>
<td>The No Action Alternative would require no new construction. This alternative would have no adverse impact.</td>
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<td>✓</td>
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<td>There are adverse impacts under the No Action Alternative. (The related information presented in Chapter 6 already reflects this.)</td>
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<td>3</td>
<td>Table ES-1: Greenhouse Gas Emissions, Page VIII</td>
<td>There would be an increase in GHG in the No Action and no significant adverse GHG impacts under the Proposed Action.</td>
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<td>✓</td>
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<td>Both the No Action and Proposed Action would result in GHG emissions in the short term, however both would result in a net reduction of GHG in the long term. The GHG discussion in Chapter 6 should be clarified to reflect this as well.</td>
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<td><strong>Chapter 6: Affected Environmental and Environmental Consequences</strong></td>
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<td>4</td>
<td>Section 6.1.7.2 Parking, Proposed Action Page 44</td>
<td>The proposed ASP L1, L2, L3, and L4 interborough bus routes and temporary M14 SBS would require bus stops and bus layover locations that would temporarily remove up to 970 on-street parking spaces.</td>
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<td>✓</td>
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<td>The number of on-street parking spaces that would be temporarily removed is now estimated at 1,075 spaces.</td>
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<td>SEA Section and Page Number</td>
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<td>5 Mobile Source Impacts: Section 6.2.2.1 Page 48</td>
<td>The buses added to the 14th Street corridor M14 SBS route will include a “composition of the supplemental bus fleet, including a plan for 15 electric buses and diesel buses”</td>
<td>M14 SBS Bus Route: The deployment of 15 electric buses will begin in fourth quarter of calendar year 2019, instead of at the start of the ASP. Brooklyn-based Interborough Bus Routes: The SEA did not include any electric or hybrid-electric buses for these routes. MTA NYCT now proposes to use 5 electric and 10 hybrid-electric buses on these routes starting April 2019.</td>
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<td>6 Section 6.5.2.1: Historic, Cultural and Archaeological Resources, Page 58</td>
<td>Roadway Resurfacing: No historic street surfaces would be affected; all roadbeds are asphalt.</td>
<td>The granite pavers and concrete pavement along Union Square West, which is located within the Union Square National Historic Landmark, will be replaced with asphalt, as noted on page 97 of the SEA.</td>
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<td>7 Section 6.6 Noise and Vibration Page 71 and 72</td>
<td>The SEA presented information related to CEQR guidelines regarding passenger car equivalent screening methodology for noise impacts, which needed to be clarified.</td>
<td>Noise level increases of more than 3 dB(A) is considered the minimum level of noise increase in which most listeners can perceive and thus result in potential annoyance to listeners. Therefore, a significant noise level increase is identified as a noise level increase of greater than 3 dB(A). For noise related to traffic, the CEQR guidelines use the following methodology: A doubling of passenger car equivalents (PCEs) would result in an 3 dB(A) noise increase. The ASP would not result in doubling of PCEs; therefore, no quantitative noise analysis or mitigation is required. As stated in the SEA, there will be no significant noise impact.</td>
<td></td>
<td></td>
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<tr>
<td>8 Mobile Source Impacts: Section 6.2.2.1 Page 48</td>
<td>The SEA presented information related to diesel buses “fitted with filters that reduce particulate matter emissions by as much as 95 percent.”</td>
<td>All diesel buses used for the ASP would be fully compliant with current emissions control technology that achieves up to 95 percent particulate matter emissions reductions in comparison to older technologies.</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
### Chapter 7: Section 4(f) of the Department of Transportation Act

<table>
<thead>
<tr>
<th></th>
<th>SEA Section and Page Number</th>
<th>SEA Text</th>
<th>Modifications, Clarifications, and Errata</th>
<th>E</th>
<th>D</th>
</tr>
</thead>
<tbody>
<tr>
<td>9</td>
<td>Table 16. Section 4(f) Properties: Page 95</td>
<td>Total size of North 5th Street Pier and Park was reported as 51,000 square feet.</td>
<td>The correct total size of the North 5th Street Pier and Park is 47,026 square feet (37,026 square feet of existing parkland plus approximately 10,000 square feet for the Empire Pier, which will be under NYC Department of Parks and Recreation jurisdiction in the near future.)</td>
<td>✓</td>
<td></td>
</tr>
<tr>
<td>10</td>
<td>Stuyvesant Cove: Section 7.2.1 Page 96</td>
<td>The changes to Stuyvesant Cove Park involves the creation of a path that would cut through a landscaped garden area of the park.</td>
<td>Plans were later modified in coordination with NYCEDC to create the most direct connection to the ferry. Project now includes temporary removal of a tree and bench, and relocation of one garbage can.</td>
<td></td>
<td>✓</td>
</tr>
</tbody>
</table>

### Chapter 8: Measure to Minimize Harm

<table>
<thead>
<tr>
<th></th>
<th>SEA Section and Page 99</th>
<th>SEA Text</th>
<th>Modifications, Clarifications, and Errata</th>
<th>E</th>
<th>D</th>
</tr>
</thead>
<tbody>
<tr>
<td>11</td>
<td>Chapter 8 Measures to Minimize Harm Page 99</td>
<td>Chapter 8, page 99, of SEA presented proposed Measures to Minimize Harm.</td>
<td>Based on project development and review of agency and public comments received on the SEA, the measures have been updated. Please see FONSI Attachment B: Revised Measures to Minimize Harm for updated measures, which have been incorporated into the Proposed Action.</td>
<td>✓</td>
<td>✓</td>
</tr>
</tbody>
</table>

In addition to the above clarifications to the SEA and modifications made as a result of project development since publication of the SEA, the following one (1) modification to the ASP has been made as a result of public comments made during the 30-day public viewing period for the SEA:

**Modification**

MTA NYCT has added a new L5 bus route providing service from Canarsie to the Crown Heights-Utica Avenue 3/4 station. (This modification is also presented in Attachment A: Summary of Responses to Comment.)