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Assemblymember 74th District

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**Comments on MTA New York City Transit Canarsie Tunnel Project Supplemental
Environmental Assessment and Section 4(f) Review
Office of Assemblymember Harvey Epstein
August 18th, 2018**

This Supplemental Environmental Assessment provides a wealth of information and will serve as a useful tool for guiding ongoing conversations with the communities affected by the incredible logistical challenge presented by the closure of the Canarsie Tunnel. Despite the level of detail in the SEA and the modeling of the Alternative Service Plan's effects, many questions about the implementation of the ASP remain; modeling, however technologically advanced, is no substitute for the real thing. I am hopeful that MTA and NYCDOT will live up to their promise to quickly adjust the ASP accordingly, especially as issues identified by community members, who know their neighborhoods best, arise. I believe there are also further questions to be answered and additional steps the MTA and NYCDOT can take ahead of the Canarsie Tunnel closure to ensure that things are running smoothly on day one.

14th Street Busway

The ASP relies heavily on diesel-powered buses to provide transit options to Manhattan-only commuters, with 84,000 bus riders expected to take advantage of proposed and existing routes along the 14th Street corridor. The quantity and frequency of buses needed to serve such a high volume of customers is staggering, particularly at peak hours—there is no room for error. To provide high quality service to bus riders and avoid the negative impacts to air quality caused by slow moving buses and trucks it is critical that traffic continues to flow smoothly along the 14th Street corridor. To achieve this, strict enforcement of the no personal vehicle ban coupled with the development of a strategy to rapidly remove any broken down vehicles from the Busway is essential. That strategy could include sensibly placed tow trucks that could be quickly deployed to clear out a wreck.

The volume of L1 and L4 passengers arriving from Brooklyn and disembarking at the 1st Avenue 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 E. 15th Street commuter drop-off point and possibly relocating it.

To facilitate access for 14th Street residents NYCDOT should evaluate the feasibility of right



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turn lanes on 1st and 3rd avenues.

Trucks

14th Street's character as a mixed-use corridor makes its temporary remodeling as a Busway complicated for trucks needing to make deliveries to local businesses. In order to minimize the negative impacts of trucks making deliveries along 14th Street, and the impacts caused by the rerouting of trucks that used 14th Street as a crosstown route to make deliveries elsewhere, an expansion of NYCDOT's Off-Hour Deliveries (OHD) Program should be seriously considered. The OHD is a highly successful model for reducing congestion and emissions and it has already been adopted in other cities around the US, including Washington, D.C.

The NYPD Transportation Division's Truck Enforcement Unit should begin educating commercial drivers well in advance of the closure about the alternate routes they will need to take to make their deliveries. It is extremely important that trucks are kept off residential side streets that cannot handle the weight and vibrations caused by trucks. As we have recently seen in the Flatiron District, New York's underground infrastructure is dangerously old and prone to catastrophic failures. For the safety of residents and to avoid major disruptions to quality of life, enforcement needs to be highly proactive and responsive.

Ferries

The Stuyvesant Cove ferry terminal is projected to serve 8,900 daily displaced L train riders, in addition to NYC Ferry riders, who are not necessarily affected by the closure of the Canarsie Tunnel. There is the potential here for a crowd control issue at peak hours. 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.

Bicycles

Many New Yorkers could add a cycling leg to their commute or switch to cycling for the entirety of their commute. We are likely to see many new riders on the road with differing levels of experience. To accommodate new riders, signage delineating bike paths must be explicit. 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.



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Parking

NYCDOT must develop a reliable system for allowing local residents who live along the corridor and close by to access private garages. 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.

Air quality

Air quality remains a serious concern. The SEA suggests that, under the Proposed Action, air quality may actually be improved compared to the No Action Alternative. This is a disingenuous framing of the issue. In Manhattan Community Districts 3 and 6, the last available New York City Community Air Survey (NYCCAS) reported annual average levels of PM_{2.5}, as 8.9 µg/m³ and 10.21 µg/m³, respectively. These levels are dangerously close to the EPA's national air-quality standard for PM_{2.5}, which is established as no more than 12 µg/m³. In 2015, the PM_{2.5} level in Manhattan CD6, was 12 µg/m³, the second highest in New York City.

In the last year of available data, Manhattan's CD6 saw a rate of asthma hospitalizations among children ages 5 to 14 as one-third the Manhattan and citywide rates; in Manhattan CD3, the figure was closer to the citywide rate, which is 36 per 10,000 children ages 5-14. Peer-reviewed studies have shown that children are more susceptible to PM_{2.5} pollution and that exposure can have an adverse impact on asthma emergency department visits, particularly in warmer months.

Compared with the status quo, rather than the No Action Alternative, the Proposed Action seems likely to create a net negative impact to air quality. With the volume of diesel-powered buses the MTA needs to use to move back and forth along the 14th Street Corridor, there will inevitably be slowdowns caused by unforeseen circumstances which in turn will cause congestion and idling—a major source of air pollution and specifically PM_{2.5} emissions, which can cause health problems, particularly among the very young, seniors and those with preexisting health conditions. The ASP also touts the 15 electric buses that will play a role in mitigating any negative effects of additional bus volume—that is 15 out of 200 buses expected to serve L train riders—less than 10 percent. We already have diesel bus oversaturation in our city. Every effort should be made to increase the number of electric buses serving riders affected by the L train shutdown, and in general.

The MTA should commit to monitor air quality along the 14th Street Corridor and affected



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side streets and develop plans in concert with the Department of Environmental Conservation to mitigate any negative impacts from increased bus traffic.

Accessibility

The SEA does not directly address how seniors and residents with physical disabilities will be affected by the ASP. To ensure that residents with mobility issues who live along the 14th Street Corridor continue to have easy access to Access-a-Ride and ADA-compliant taxis, 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. There are many medical facilities along the corridor, and many seniors and residents with mobility issues need door-to-door transportation—these individuals need the ASP to work for them as well.