# **Appendix Q: Public Comments Received**

Created Date	First Name	Last Name	City	State	Topic/Agenda item	Attachments	Meeting Series	Meeting Type
10/28/2023	Erica	Taliento	Staten Island	NY	It is absolutely insare that the plan proposed involves narrowing the existing sidewalks, which the report stating "Significant adverse impacts are anticipated at two sidewalk locations." and "These potential impacts would remain unmitigated." The sidewalks on Richmond Terrace are already extremely narrow for the unrent use that even the NYC DOT listed it as a problem in need of fixing in their own analysis of the corridor. Narrowing the existing sidewalks to the point of near elimination while also adding two additional lanes of traffic to an already alare road will make the simple act of existing on Richmond Terrace in St George one of absolute misery. Let alone the safety impacts to podestrina this would cause. The very fact that this was seen as okay is a disgrace to the MTA and I can only hope that when you inevitably need to cooperate with NYC DOT on the right of way they give you the needed pushback on this absolute listic; idea.	No	North Shore BRT EIS	Online Comments
11/1/2023					There eveloped and the Draft EIS for MTA's Staten Island North Shore Bus Rapid Transit Project and I approve and support the findings in the document. I also approve and support the Initial Automative	No		
11/1/2023	Jackson	Hurst			As a resident on the North Shore on Staten Island, I'm super excited to hear about the potential rapid transit expansion on the North Shore, or even on Staten Island in general! Staten Island Islong been overdue for public transit extensions, currently being served only by the Staten Island Railway (SIR) in terms of rapid transit. I am personally very grateful for the SIR (I heavy Rail Transit tystem); it is a quick and conventient service that consistently heps me get to and from school and other places. While I am pleased with the prospect of rapid transit being reinstated along the North Shore ROW. I am primarily concerned about the chosen method, which is Bus Rapid Transit (RR), as well as a few other aspects. My main concern in regard to the choice of BRT is my uncentainty about how well this chosen method, which is Bus Rapid Transit (RR), as well as a few other aspects. My main concern to Manhattan. However, these services are othen seen as slow, crowded, and not always convenient. For instance, if you know a car ride takes ten minutes, the worked that I've been pressed up against the windshield, or I have towat again for the next towat and concerns and transits the missing concerns and may avoid and transit when the l can understand that some of these time related problems occur due to buse being stuck in car traffic, which won't be the case for most of the RRT, I am stII worried that these buses may encounter similar issues with overcrowding and delays to hear subates and routed that I've been had all proposed lines on Staten Island. Staten Island, when the North Shore Robid Tansit (IRT), would be much more suitable for the North Shore Robid Tansit (IRT) system or, in this care, the more fasable the exploring topic state is allowed not the North Shore Robid Tansit (IRT) system or, in this care, the more fasable the tay and an trait, tay RIT, would be much more suitable for the North Shore Rapid Transit (IRT) system or, in this care, the more fasable thave to plane, they and the RIT, and thave thad all p	No	North Shore BRT EIS	Online Comments
11/5/2023	Dominic	Perrotta	Staten Island	NY	potential to be great. HOWEVER, I cannot stress enough the importance of choosing the LRT system over the BRT system. Thank you for allowing me to provide my input on this project.	No	North Shore BRT EIS	Online Comments
11/6/2023	lohn	н	Staten Island	N	project. What would be the feasibility of maintaining a two way busway on the north side of Richmond Terrace between Nicholas St. and St. George instead of the median? This may make it asaier for buses to travel as unimpededly as possible on this high traffic stretch of the alignment as buses would have less a need to cross westbound traffic. This may also have the added effect of minimizing NYPD activities crossing the busway or interfering with the busway. Factors that appear to make a north side busway more feasible include the removal of median and removal of paring to support the busway installation, and lack of proposed intermediate stops between Nicholas St and St. George.	No	North Shore BRT EIS	Online Comments
					This project is long overdue and will add a much-needed option to Staten Island's deprived public transportation system. The BRT will provide a faster, more efficient line that will			
11/13/2023		Dugo			greatly benefit the community. It is hoped that it will also contribute to connecting Staten Island regionally to the NJ Transit system. This is a great idea and long overdue!!! I like that this is extended down South A <u>venue connecting</u> to our corporate parks and hotels. My only negative is maintain the 596 when	No	North Shore BRT EIS	Online Comments Online Comments
11/16/2023	Linda	Hyland	Staten Island	NY	encided. Thanks so much for advancing this projectil Best regards. Partick Hyland revisited. WTCEC recently acquired a tetch of the SL George watefront that was part of the WY Wheel site and plans to oversee the explanade piece of the property. When the Envisited WTCEC recently acquired a tetch of the SL George watefront that was part of the WY Wheel site and plans to oversee the explanade piece of the property. When the Envisited WTCEC recently acquired a tetch of the SL George watefront that was part of the WY Wheel site and plans to oversee the explanade piece of the property. When the Envised WTCEC proposed alignment would pase along Borough Hall and other vicius sei, Including the WTD 120 Procent and Staten Island Family Court. This area is problematic since Richmond Terrace is very narrow and highly traversed by busics trucks, and pastegner vehicles. Regarding access to New lesses the own and inset to gard (hightingh) exclision acceptorate access to Newark Alport, MetroPark (Antrak), and the Hudson Bergan Light Rail. While access to Ni is being looked at and rises to gard (hightingh) exclision incorporate access to Newark Alport, MetroPark (Antrak), and the Hudson Bergan Light Ball while access to Ni is being looked at part of the West Shore BXT plan, that plans is further out, and we believe a NI connection needs to happen as part of North Shore BXT phane planning is further along, in 2007, the MIT alignment to the SBY route, the first instrate bus oraces to Newark (Ch Trans), which connects Ethinghiles, Staten Island, with the 34th Street Hudson Bergan Light Rail in Bayonen. The route remains the only alternative transit option on Staten Staten to Langering the proposed Jeorge MTC While we support this generawy, we believe that planning along the ROW in this area should backate in NL Regarding the proposed generawy on the Genera MTS Shore Balland ROW. "While we an intelleased in 2004. Phanne for this project has bagged over the last two decades, which haresulted in new issues arising. That being sid, "w	No	North Shore BRT EIS	Online Comments
11/21/2023	Jessica	Vodoor	Staten Island	NY	see attached letter - letter will be summarized in the RTC chapter	No	North Shore BRT EIS	Online Comments
11/21/2023	Tatiana	Arguello			Why wasn't this taken to more of an open forum. We are concerned about this imposing on Snug Harbor land and the restaurant landscape like Blue.	No	North Shore BRT EIS	Online Comments
11/22/2023	Eric	Hagmueller	New York	NY	I am a member of the Staten Island community, working at Snug Harbor Cultural Center and Botanical Garden. I object to the lack of notice our community has received relating to the MTA's proposal to remove waterfront parkland adjacent to the Snug Harbor Cultural Center & Botanical Garden. I am on in rayor of this proposal "final" scope that removes or reduces parkland us accommodate the BR. The changes to the MTA's Draft San of Final Scope Councent require greater input from the community, and the one-month public comment period concluding on November 24, 2023 is unacceptable and provides insufficient time to allow our community stateholders to digest and understand the impacts of the MTA's plant. The MTA has not sufficient water barlend this plant os Community stateholders and MTA's orging-the representatives should present the scope to a Community Board meeting, have additional stateholder discussions with directly impacted businesses and residents, and incorporate a more nobust public input process.	No	North Shore BRT EIS	Online Comments
	Martha	Neighbors	Staten Island	NY	Please see uploaded document detailing my concerns regarding the proposed BRT for Staten Island's North Shore. Feel free to contact me with any questions or for clarification.	Yes	North Shore BRT EIS	Online Comments
11/22/2023		Vodoor	Staten Island	NY	Please see attached letter, expressing the concents and comments of the impacted Sung Harbor Cultural Center & Botanical Garden, as well as a Staten Island resident. Lobject to the lack of notice our community as given about the MX proposal to remove waterford parkind in front of the Cultural Center. While support additional public transportation to the lack of notice our community as given about the MX proposal to remove waterford parkind in front of the Cultural Center. While support additional public transportation of Staten Island, resident, Lobject to the lack of notice our community as given about the MX proposal to remove waterford parkind in front of the Cultural Center. While support additional public transportation earnor that waterform is a historic fasture of Staten Island, including the planned BRT, I am not in fixor of this proposed final" scope that emoves or reduces parking that a commodate it. The waterform is a historic fasture of Staten Island, residued, once how new the venerable retirement home Saline". Sing Harbor, catalitised by as will written by Alexander Familion In 1801. The Hobbe Matrime Collection is entrusted with preserving the history of this site, but the museum's leadership also looks ever forward to how we can better serve the community, which includes plans to reactivate and provide greater public access to this waterfront space, in collaboration with our Cultural Center partners. The charges to the MTX barbit Sal fard Sal face Document require greater input from the community, and the one-monthy public comment provide is unacceptable and provide is multicent time to allow stateholders to digest and understand the impacts of the MTX's plan. The MTA is not stifficently alarted or circulated this plan and MTX's project representatives should process. It has you for considering my objections, and incomplate area are nore tobus trubic input process. It has you for considering my objections, and	Yes	North Shore BRT EIS	Online Comments
11/22/2023	Ciro	Galeno, Jr.	Staten Island	NY	look forward to further discussions. Respectfully, Ciro Galeno, Jr.	No	North Shore BRT EIS	Online Comments

					To whom this may concern, Good afternoon. Please see the attached statement from Staten Island Borough President Vito Fossella re: potential Staten Island North Shore BRT study.			
11/22/2023	Nicholas	Thompson			Sincerely, Nicholas Thompson Communications Specialist Office of Borough President Vito Fossella Phone: (718) 816-2115 Email: nthompson@statenislandusa.com	Yes	North Shore BRT EIS	Online Comments
11/22/2023	lin	Daqilan			To whom it may concern, Thank you for the opportunity to submit public comment regarding the North Shore Bus Rapid Transit Draft Environmental Impact Statement in support of this critical project that will improve transit access. As rider representatives and trusted advicors to the MTA, the Permanent Citizen Advisory Committee to the MTA (PCAC) regularly researches issues, recommends values oblicitons, and advocates on behalf of the region's MTA riders, including those who use the Staten Island Ralway and busces that serve Staten Island. Those includes may who make the long contrast contexts on the MTA for the region's MTA rider. With a higher population density and a lower rate of car- ownership than the borough overall. Staten Island's North Store is perhaps the most transit-dependent part of the borough. Despite this, the North Shore has for decades been drastically undersened by MTA service. The existing deficits on the North Shore's to arrush for the Store's Staten Island. Those includes may who the store that more the Vorkers can depend on transit on Staten Island. In moving forward y Areas. The North Shore has for decades been drastically undersened by MTA service. The Vorkers can depend on transit on Staten Island. In moving forward with this project, the MTA would recognize this and right the wrong created by the observe of the North Shore's context and the advocative the state state of the observe of the North Shore Base. This and right the wrong created by the observe of the North Shore Base Raid on the store is the envert advice resonance development activity on Staten Island, including the New York City. Economic Development Corporation 'S Staten Island North Shore's aten listen and Nerrey's Hudido. Staten Island Vorth Shore's aten listen and Nerrey's Hudido. Staten Island North Shore's aten listen and Nerrey's Hudido. Staten Island North Shore's aten listen All Nerrey's Markance and Nerrey's Hudido eractive the Nerrey's Hudido eractive and staten is staten islaten Nerrey's Markance and Nerrey's Hu	Vec	North Shore BRT EIS	Online Comments
11/22/2023	Lisa	Daglian			improve access to opportunities for residents of Staten Island and beyond. They reserve most not mark how sensors you could be beyond. They reserve to the go across the street and down a hill to park in a parking garage. That is not accessible to the places that we go to. This is completely unacceptable as a person	Yes	NORTH SHORE BKT EIS	Online Comments
11/23/2023	lorri	Senk	Staten Island	NY	panding to expect us to go do dous to extreme and contraining to many panding you expect to see you can be compared by the compared to the panes that we panding you can be compared to the co	No	North Shore BRT EIS	Online Comments
11/23/2023	corff	Jellik	staten isiaño	IN I	prease prease consider what you dre during to our continuutly.	Diri D	NOTITI SHORE BRI EIS	comments
11/23/2023	Norman	J Senk	Staten Island	NY	I am a paraplegic. I cannot go out unless we can park on the street in a legal parking spot where my van can open and a ramp can come down. I have had my wife learn how to park by the sidewalk so that she could help me out of the van as I am unable to walk. I enjoy going to dimer at various restaurants in St. George and mostly can find parking on Richmond Trarea and it has been convenient for us because it is fatt and she sable to manever me in and out to stroisoly to take awy those parking posts to put bus laries in that I cannot utilize because my wheelchait does not fit on a New York City bus is not not fair to me as a person who lives in this borough and help me out of borough and head to be one of Stater tilland in the St. George area for ore? Sy gars you rapin yeed to reconsider what you are doing to us as community members and leaders plesed on take awy our parking it is essential to my being able to get out of our home into a social setting your consideration is deeply appreciated and I would welcome the opportunity to speak with you. Wy telephone number is deviced in the shelf of every person who is handicapped who struggles enough on a day-to-day, and just wants to have a little social life once in a whele in my neighborhood, thank you for listening	No	North Shore BRT EIS	Online Comments
11/24/2023	Janice	Monger	Staten Island	NY	As CEO the Staten Island Museum sited at Snug Harbor, and a cultural leader that has worked in landmarked historic waterfront sites for more than a decade, I want to raise serious concerns about the proposed BKT path and structure as it affects Snug Harbor's waterfront parkland. I raise these concerns both in my professional capacity and as a north shore maident. While lunderstand that there are transportation needs to be addressed, this version of the planc us off waterfront views and access when the north shore is desperately in the rebuilding of a public dock is certain to Snug Harbor's parkland waterfront with concrete barries. The erupdosed elevated busway 30 feet wide be built on concrete pillars, effectively replacing the waterfront parkland space with a concrete barrie, elevated busway, visually walling off the waterfront with concrete barries. The erupdosed goal built dock is certained to Snug Harbor's parkland waterfront and here ebuilding of a public dock is certained to Snug Harbor's capilal master pland vision, and this proposed scope of the BRT would effectively eliminate the vision of a vibrant waterfront parkland for the Snug Harbor community. The separation of the historic Snug Harbor campus from its waterfront context creates a splinfcant negative impact on the historicid context of the situ, which is deeply connected to the waterfront and the marritum heritage of our community. Additionally, there was completely inadequate outcekn and more of this is which is deeply connected to be waterfront and the marritum heritage of our community. Additionally, there was completely inadequate outcekn and more of this exist. In pland as this with the radical changes being put forth. This plan undermines great progress toward making Snug Harbor a citywide destination with waterfront porning as important a plan as this with the radical changes being put forth. This plan undermines great progress toward making Snug Harbor candide destination of this plan. The path and structure would be damaging to	No	North Shore BRT EIS	Online Comments
11/24/2023	Junice	monger	Statem State		"I am a member of the Staten Island community, residing at (insert address). I object to the lack of notice our community has received relating to the MTA's proposal to remove	110	North Shore Bitt Els	onine connents
11/25/2023	Dina	Rosenthal	Staten island	NY	waterford pakkand adjacent to the Soug Harbor Cultural Center & Botanical Carden. I am not in favor of this proposed "final" scope that removes or reduces parkland to accommodate the BRT. The changes to the MTA's Draft EIS and Final Scope Document require greater input from the community, and the one-month public comment period concluding on Nevember 24, 2023 is unacceptable and provides insufficient time to allow our community's stakeholders to digest and understand the impacts of the MTA's plan. The MTA has not sufficiently alerted or circulated this plan to Community stakeholders and MTA's project representatives should present the scope to a Community Board meeting, have additional stakeholde discussions with directly impacted businesses and residents, and incorporate a more notes tublic input process.	No	North Shore BRT FIS	Online Comments
11/26/2023	neil	anastasio	Staten Island	NY	"I am a member of the Staten Island community, and President of the Forest Regional Residents' Civic Association (FRRCA.org) residing an intervent of the Island community, have received relating to the MTA's proposal to remove waterfront parkland adjacent to the Snag Harbor Cultural Center & Botanical Garden. I am not in favor of this proposed "final" scope that removes or reduces parkland to accommodate the BRT. The changes to the MTA's Draft ES and Final Scope Document require greater input from the community that removes or reduces parkland to accommodate the BRT. The changes to the MTA's Draft ES and Final Scope Document require greater input from the community, and the one-month public comment prior and concluding on November 24, 2023 is unacceptable and provide insufficient time to allow our community's stakeholders to digest and understand the impacts of the MTA's project representatives should present the scope to a Community Board meeting. have additional stakeholder discussions with directly impacted businesses and nesidents, and incorporate a more robust public input process."	No	North Shore BRT EIS	Online Comments
11/27/2023	Lakshmi	Rao Sankar	Staten Island	NY	This is a terrible plan. We have a beautiful though underdeveloped waterfront, MTA's plan needs to take in input from people who live in the community. "I am a member of the Staten Island community, residing at (insert address), I object to the lack of notice our community has received relating to the MTA's poposal to remove waterfront parkland adjacent to the Snug Harbor Cultural Centre & Botanical Garden. Jam not in sivor of this proposed "Inai" scope that removes or reduces parkland to accommodate the BRT. The changes to the MTA's Draft BS and Final Scope Document require greater input from the community, and the one-month public comment period concluding on December 1, 2023 is unacceptable and provides insufficient time to allow our community's stateholders to digest and understand the impacts of the MTA's plan. The MTA has not sufficiently alerted or circulated this plan to community stateholders and MTA's poject registerstaters should present the scope to a Community Board meeting, have additional stakeholder discussions with directly impacted businesses and residents, and incorporate a more robust public input process".	No	North Shore BRT EIS	Online Comments
11/29/2023	Dana	Walker	Staten Island	NY	I am a member of the Staten Island community, residing as I be a state of the Staten Island community has received relating to the MTA's proposal to remove waterfront parkland adjacent to the Sung Harbor Cultural Center & Botanical Garden. I am not in favor of this proposed Trian's cope that removes or reduces parkland to accommodate the MRT. The changes to the MTA's bard frait Scope that are to each state of the MTA's proposal to remove the MTA's bards. The changes to the MTA's bard frait Scope to a state frait of the MTA's transmet period concluding on December 1, 2023 is unacceptable and provides insufficient time to allow our community's stakeholders to diget and understand the impacts of the MTA's bard. The MTA's transmet period distinuity alerted or circulated this plan to Community stakeholders and MTA's project representatives should present the scope to a Community Board meeting, have additional stakeholder discussions with directly impacted businesses and residents, and incorporate a more notes public input process".	No	North Shore BRT EIS	Online Comments

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					access to their fair share of capital projects, despite Staten Island paying a tremendous amount of money via fares and tolls. This initiative would uplift the North Shore's predominantly			
					minority communities and open doors to increased economic prosperity, educational opportunities, and better access to Manhattan via the Staten Island Ferry. Additionally, it would			
					improve connectivity for Manhattan residents visiting Staten Island's cultural centers, restaurants, and local businesses, boosting our economy. I am in favor of this project and urge the MTA to collaborate closely with our community's elected officials, commuters, and key stakeholders during the design phase to address any concerns, ensuring the project's success in			
11/29/2023	Nicolo	Malliotakis	Staten Island	NV	min to collaborate cobely with our community's elected anicals, commuters, and key stakeholders during the design phase to address any concerns, ensuring the project's success in efficiently connecting Statem Island from east to west.	No	North Shore BRT EIS	Online Comments
11/23/2023	NICOle	Wallotakis	Staterrisiand	IN I	Emerging Connex con gradem stand from each owes. Shelaph Mahoney, the President of Atlantic Salt, Inc., requested that I submit the written comments about the DEIS for the North Shore EIS. As described in the written comments	NO	NOTET SHOLE BKT EIS	Online Comments
					attached below, Atlantic operates a water-dependent marine terminal in a Significant Maritime and Industrial Area (SMIA) in the New Brighton neighborhood on the North Shore.			
					Atlantic is very concerned about the proposed BRT design and believes that it will "substantially hinder" achievement of the policies established by New York City's Waterfront			
					Revitalization Program. A reasonable alternative exists as documented by earlier studies. As currently proposed, the BRT design is not compliant with coastal zone management			
					requirements. Atlantic looks forward to further discussion and evaluation. Please add the following electronic addresses to the BRT Project contact list			
11/30/2023	Pohort	McDonnell	Welleslev	ма	Please confirm receipt of the Upload File. Thank you and best regards, R.E. McDonnell	Yes	North Shore BRT EIS	Online Comments
11/30/2023	Kobert	WCDOTITEI	wellesley	inin	The North Shore despendery needs bith. Statem Statem State on the longest commate times in three, and making bas service taster and more reliable with help many more	165	NOTET SHOLE BKT EIS	Online Comments
					people gain access to jobs, education, and health care. Staten Island is one of the most car-dependent areas of NYC because of current, limited transit options. Bus Rapid Transit is essential to reduce private car usage, save money for middle and low-income residents of our borough, and to reduce greenhouse gas emissions. Thank you for the opportunity to			
12/1/2023	luctio	Wood	Staten Island	NV	essential to reduce private cal usage, save money for midule and low-income residents of our borough, and to reduce greenhouse gas emissions. Thank you for the opportunity to support this critical project.	No	North Shore BRT EIS	Online Comments
12/1/2023	Justin	w000	Staterrisianu	IN I	support ans chata project.	NO	NOTHER SHOLE BKT LIS	Online Comments
					Would like much more information about this and need more time to learn more and then comment more on all this. Thus also perhaps maybe need more time to perhaps maybe			
12/2/2023	MR. LINDY PETER	CRESCITELLI	STATEN ISLAND	NY	invite you to our local civic meetings to learn even more about this too, please email us a	No	North Shore BRT EIS	Online Comments
					Please stop this project. We need to preserve our waterfront, and not have an intrusive structure that destroys our view and gardens and parkland is immediate to the area. Again,			
12/12/2023	Derek	Weng			please stop this project.	No	North Shore BRT EIS	Online Comments
		, in the second s						
				1	I oppose the plan for the elevated highway blocking access to the waterfront along the kill van kull. Please find another solution which doesn't obstruct access. I understand that there's	1		
12/12/2023	Susannah	Abbate	Staten Island	NY	I oppose the plan for the elevated highway blocking access to the waterfront along the kill van kull. Please find another solution which doesn't obstruct access. I understand that there's an option for a streetlight along Richmond Terrace instead of the dedicated bus route. Please consider that.	No	North Shore BRT EIS	Online Comments
12,12,2023			a cartan fallanda	1			Listan phore pict Lis	state controlits
				1	The EIs was thorough and well-reasoned. I am a resident of the impacted area (living immediately south of Snug Harbor, between the New Brighton and Livingston stations) and am	L		
12/13/2023		Woutas	S	NY	wholly satisfied with the environmental and socioeconomic impacts presented. Lurge a speedy continuation of the project to ensure its benefits are realized as soon as possible.	No	North Shore BRT EIS	Online Comments
12/13/2023	Nicholas	Zvegintzov	Staten Island	NY	Please see report from Nicholas Zvegintzov, Community Board 1, Staten Island Transportation Chair Tam a tract resulte minima: years or chy service: Taiso serve on community board #151: trans ne mercome une uscussion or sonely needed transportation alternatives to not only corr,	Yes	North Shore BRT EIS	Unline Comments
1			1	1	but also for ALL of Staten Island, the BRT project as proposed with \$1.3 Billion in construction costs and \$24 million O&M annually- needs to be re-evaluated. This is a HUGE	1	1	
1			1	1	expenditure for only saving riders 5.6 minutes in their commute time. One of the major impacts the present BRT proposal will have is on both the St. George area and its Economic	1	1	
				1	Development. (I will let others comment on the negative impacts this project will have on our belowed Snug Harbor.) The Mayor recently highlighted exciting efforts in the Sept. 2023	1		
					Staten Island North Shore Action Plan. The Introduction pages to this plan stated by EDC President Kimball and Council Member (49CD) Kamilla Hanks point out efforts "to support more housing and economic development opportunities along the Richmond Terrace Corridor.' and "the growth potential for the North Shore of Staten Island is substantial." That			
					more nousing and economic development opportunities along the kichmond Terrace Corndor: and the growth potential for the North Shore of Staten Island is substantial. That being said, the community and government agencies, civic and area committees have spent many years (decades) to attract and develop the downtown Staten Island area for tourism			
					Deing and, the commonly and generating agencies, one area commences have spenn many peak (decades) to and a many and develop the common statement agencies, the same spenn many peak (decades) to and a many and develop the common statement agencies, and the same spenn many peak (decades) to and a many and the same spenn many peak (decades) to and a many and the same spenn many peak (decades) to and a many peak (decades)			
					economic scenarios for this rae. Certain elements of the BRT proposal will only further exace that the downturns we are already experiencing. (1) The elimination of 250 parking			
					spaces from Nicholas Street to the Ferry Terminal will create parking hardships for individuals (especially the handicapped and mobility challenged) and burdens to businesses that			
					depend on Richmond Terrace's street parking for patrons; (2) There will be no parking near the Ferry Hawks baseball stadium. Commercial and school buses load and unload patrons,			
					teams and Access-A-Ride and private handicap transportation accessible vans will also be impacted; (3) I believe that response times for the 120 Pct. vehicles will be slowed with			
					officers trying to navigate vehicles across/over the medians. WE appreciate the consideration of transportation improvements for our borough's residents. We must work together with			
12/19/2023	Lillian	Lagazzo	STATEN ISLAND		our Elected Offices to make this a viable outcome for ALL residents. Again, 5.6 minutes saved and the enormous expenditure of funds points to the need for greater discussion and I would really love this option. I live nght by the old rail track and would take this everyday for my commute into the city. I currently take the 40 and 46 and it is temble always	No	North Shore BRT EIS	Online Comments
12/21/2023	ANTHONY	AVILA			overflowing sometimes waiting many many minutes in the cold this would help alleviate that traffic so much	No	North Shore BRT EIS	Online Comments
					The alienation of parkland along the Snug Harbor Esplanade is completely unacceptable and contrary to the City's goal of increased assess to our waterfront. The MTA needs to			
12/22/2023	John	KILCULLEN			reevaluate the design strategy here.	Yes	North Shore BRT EIS	Online Comments
					revaluate the design strategy here. As it concerns the impacts of the shug Hardoor parkaing, open space, and instorical significance, the plan should consider allowing for creation and access for a herry slip on the water side of Bichmoor Barzas, in the Shug Hardoor parkaing, open space, and instorical significance, the plan should be a basefit as well as a mitiration factor. In include a well designed and			
					side of Richmond Terrace, in the Snug Harbor land. Historically, there was a boat slip there and it would be a benefit, as well as a mitigating factor, to include a well designed and landscaped boat slip to allow the revival of this historic connection to the maritime themed Snug Harbor Cultural Center. The EIS should look at how to incorporate alwaterfront access			
12/22/2023	MICHAEL	HARWOOD			landscaped boat sing to allow the reveal of this motion connection to the manime memory sing harbor cultural center. The clis should look at now to incorporate awatemont access for such as additional transportation facility in connection with the proposed BRT.	No	North Shore BRT EIS	Online Comments
TE/EE/E0ES	initer met	in a circle of b			The plan hous great plantise, except to a fact clear why, in section 1, abases must proceed down titerinonial tended instead or using the existing site to a gradie teres, site	110	North Shore Bitt Els	onine connents
					Richmond Terrace, all busses leaving and arriving at St. George Terminal face a bottleneck due to limited lane space, idling vehicles by Empire Outlets, events at the stadium, and vast,			
12/22/2023	N	Norbera	163 Westervelt Ave	NY	unregulated, illegal double-parking and lane-blocking by the personal and official vehicles of the NYPD's 120th Precinct. Why not expedite busses' arrival and departure from St. George terminal via an appropriate corridor under the terminal and stadium to the Ripht Of Way at Nicholas St?	No	North Shore BRT EIS	Online Comments
12/22/2023		nonuerg	105 Westerveit Ave	011	peorge comme no en appropriete contexe differ une terminariante statution to une registe of way at trictional pat		Internal Shore Birl ElS	Grane Comments
					This comment is a plea to MTA to reconsider the current proposal for the raised BRT along Richmond Terrace, especially in front the historic landmark buildings on Snug Harbor			
					This comment is a plea to write to reconsider the current proposal for the raised by a long richmond rendee, especially in front the instoric fandmark buildings on shug Parloor Cultural Center & Botanical Garden's campus. While it is worth noting that at large the project provides improved public bus transit - much of it at grade, which is positive, the impact			
					Contrain Center of Dotalinan administration campos where is a not in round use at large the project provides improved pound do calinatis - montor in a grade, where is booking, the impact this will have on Snug Harbor will be incredibly negative. Looking at the "Snug Harbor Alternatives Analysis", and the Studio V "Snug Harbor Views - BRT Dark IS copy" files, the			
					recommended "Alternate 2" configuration, which builds out a new elevated BRT roadway structure over the destabilized shoreline or water at Snug Harbor is problematic in many ways.			
					As an overall planning move, blocking waterfront views and access for generations in the name of reducing bus travel time is inconsistent with so many New York City and Federal			
					priorities. Cities everywhere (Boston's Big Dig a prime example) are dismantling elevated vehicular roadways adjacent to the water with federal dollars.			
					(https://www.nytimes.com/interactive/2021/05/27/climate/us-cities-highway-removal.html) We know removing elevated transportation infrastructure is successfully promoting			
				1	economic growth, community connections, and the health and wellness of its citizens. It's hard to believe with the enormous cost and negative impacts of building an elevated	1		
			1	1	structure (36' above sea level), waterside of Richmond Terrace is a serious consideration in 2023. Can you please list the agency support that this project have beyond the MTA.	1	1	1
			1	1	Beyond the clear negative impacts to the shore site experience of the historic Snug Harbor, the design undermines shoreline resiliency, removes waterfront access, adds shadow to	1	1	1
				1	underwater ecologies, and other marine and environmental problems. Could cause bathymetry issues promoting sediment collection (possibility reducing the navigable waterway). The Kill Van Kull tidal straight is one of the busiest waterways in the NYC Port, and only 10 years ago finished the largest dredging job in the city to deepen it. Building a bus roadway over	1		
			1	1	Is in van kull tidal straight is one of the busiest waterways in the NYC Port, and only 10 years ago finished the largest dredging job in the city to deepen it. Building a bus roadway over the waterfront in a coastal flood zone presents tremendous engineering challenges. Can you please list the agencies that this option will require approval from? Is it NEPA and	1	1	1
				1	are wateriord in a closed in local contexplane presents deminimum challenges. Can you prese is the agencies that an opport where equiline approach is in the Agencies that are opported in a spark (well into the water) so would also require LPC/SHPO, LEC, DPP, and Army Corps of Engineers? Are there other City, State of Federal approvals required The site is zoned as a park (well into the water) so would also require	1		
			1	1	NYC Parks approval or require their conserts to convert existing parkand to a transportation use. As you note on the document that these permits from Parks are unlikely/difficult, why	1	1	1
			1	1	is it the recommended proposal? The Alternate 2 proposal is counter to the 2021 NYC Comprehensive Waterfront plan which talks about equity, access, and the "climate justice	1	1	1
			1	1	principle" that all New Yorkers should live, learn, work and play in safe, healthy, resilient and sustainable environments, even as the climate changes. This MTA proposal would cause	1	1	1
			1	1	harm to the health and quality of life of New Yorkers by putting vehicles over the water and blocking the waterfront. https://www.nyc.gov/assets/planning/download/pdf/plans-	1	1	1
				1	studies/comprehensive-waterfront-plan/nyc_comprehensive_waterfront_plan.pdf Are you looking to claim a zoning exemption? It is worth noting that this proposal is also counter to	1		
			1	1	the NYC Zoning Section Article 6 Chapter 2 "Special Regulations Applying in the Waterfront Area". Only looking at the "General Purposes" section is enough to recognize that this	1	1	1
			1	1	proposal violates every single regulatory intent of the zoning code. https://zr.planning.nyc.gov/article-vi/chapter-2 We hope that MTA will reconsider this proposal for a more suited	1	1	1
			1	1	approach to solving North Shore's transportation challenges. This solution is problematic for many reasons listed above, but primarily because it negates the equity principles of building trust in underserved communities. It does not account for any of the direct impacts it will have on the social, physical and cultural resources in the North Shore. I urge MTA to	1	1	1
				1	particular data in the second s	1		
12/22/2023	Ishita	Gaur	New York	NY	Center & Botanical Gardens	No	North Shore BRT EIS	Online Comments

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From the desk of Snug Harbor Cultural Center & Botanical Garden's President & CEO Jessica Baker Vodoor

Re: MTA's North Shore Bus Rapid Transit Draft EIS and Final Scoping Document

November 21, 2023

To Whom it May Concern:

My name is Jessica Vodoor, and I am the President & CEO of the Snug Harbor Cultural Center & Botanical Garden.

Snug Harbor, perhaps better than most, understands the need for improved transportation on the North Shore and recognizes that a project of this magnitude carries tremendous impact. But- how can we make sure that the solution for works for everyone? We have several comments and concerns about the proposed "Final Scoping" plan and details of the impacts to the Snug Harbor waterfront that require attention, discussion, incorporation, and response.

We know that transportation and elected officials have been working on a safe, convenient and quick way to get North Shore residents off the road and onto the ferry. Snug Harbor was proud to host a public presentation in 2019 on the BRT plan for the community. Since then, we have heard nothing as design discussions were forwarded with several community stakeholders. Snug Harbor staff were not included in those discussions.

The 2023 draft EIS now proposes a radical change of scope from the scope presented in 2019's public discussions at Snug Harbor. We were very surprised and dismayed to read that the scope *now* includes an elevated busway built along the Snug Harbor waterfront rather than the BRT travelling down Richmond Terrace, and that the plan proposes alienation of Snug Harbor's waterfront parkland. The EIS plan notes an Adverse Impact on Snug Harbor - yet also says that public waterfront access will be unrestricted by the design. We do not understand this seeming contradiction.

The project's scope has changed drastically since 2019, with severe impact on our community's waterfront – and this is in direct conflict with a New York City-funded Capital Project Scope Development Master Plan released in 2020 that makes the restoration of Snug Harbor's community waterfront resource a central priority. The scope of the Bus Rapid Transit plan presented also appears to be in conflict with the North Shore Waterfront Revitalization Plan released by Council Member Kamillah Hanks earlier this year, and with Mayor Adams' announced plans for a North Shore Greenway stretching from the Verrazano to the Goethels Bridge.

Additionally, the "adverse impact" significantly negatively impacts the historical context of the Sailors Snug Harbor district, interrupts the viewshed of the water from the "Front Five" buildings as well as our landmarked Gate and Gatehouse, all of which are NYC Landmarks as well as designated as a landmark district in the National Register of Historic Places. The

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historic legacy of Sailors Snug Harbor is a history intertwined with the importance of the water and maritime trades- this project severs that historic link with the proposed alienation of Snug Harbor waterfront park land and insertion of an elevated busway blocking the waterfront. Due to this, we feel the proposed design is not sensitive and creates a severe and unacceptable disruption to the context of our site's maritime historical importance.

Snug Harbor has also been working with FEMA to approve Federal SANDY relief funding for design of a new Snug Harbor dock on our waterfront, to replace the dock destroyed in Superstorm Sandy. This funding was awarded roughly 12 weeks prior to the MTA's release of the Draft EIS, and the re-introduction of a public docking facility on the Snug Harbor waterfront will need to be integrated into the Bus Rapid Transit plans at the Snug Harbor waterfront. A functioning dock would expand transportation connectivity, tourism and leisure options, not only for Snug Harbor businesses and visitors, but also for local residents as well. Accompanying the dock, the CPSD calls for full public access to Snug Harbor's two acres of waterfront, redesigned with native plantings and a shoreline reinforced and revitalized to withstand future climate change-based flooding to our historic site.

# Below are a few questions that the Snug Harbor Cultural Center & Botanical Garden team would like to see addressed in further public discussions of this proposal:

- This BRT report was released and the public comment period ended in between sessions of the Community Board I Waterfront Committee meetings. It would be helpful if the public comment period could be extended to at a minimum to mid -December to allow Community Board I review, and permit a discussion with MTA representatives at either the upcoming November 28th CBI Waterfront Committee meeting or a future meeting of this committee.
- 2. It is stated in the scoping document that Snug Harbor's public waterfront access will not be restricted by this design, but we do not understand that statement. How does the MTA envision the waterfront overlook that is part of the Sailors Snug Harbor historic district being incorporated into the busway, and how will the busway not impede public access?
- 3. The shoreline in front of Snug Harbor is severely eroded. Snug Harbor's CPSD Master Plan envisioned restoring this shoreline for protection of the adjacent historic campus, as well as investing in this waterfront for public use. Recent projects announced by the city including the North Shore Revitalization Project, the Mayor's Greenway initiatives share these goals. Has the MTA coordinated this reduction of waterfront access with city agencies forwarding these recent plans? How do they anticipate the conflicts will be resolved?
- 4. How can we ensure that what Snug Harbor is designing with FEMA funding to rebuild the Snug Harbor dock will work with the BRT plan and will not be destroyed when the



BRT is built? Can Snug Harbor team members be directly involved in future planning efforts, and is there someone from the MTA that should participate in our dock planning efforts?

5. How will the impact to the historical context of the Sailors Snug Harbor site be respected when the final designs for the busway are prepared? As noted, the site has multiple layers of designation both locally in NYC as well as at the state and national levels. We feel that the NYC Landmarks Commission should be consulted in the design process for the elevate busway- has this review occurred?

Thank you. Please feel free to contact me at jvodoor@snug-harbor.org or via phone at 718-425-3501.

Kind regards,

Jessica Vodoor President & CEO Snug Harbor Cultural Center & Botanical Garden

#### Atlantic Salt, Inc.

## 561 Richmond Terrace, Staten Island, NY 10301 Comments to the MTA re North Shore Bus Rapid Transit DEIS

Atlantic Salt, Inc. ("Atlantic"), the operator of the marine terminal on the New Brighton shoreline, appreciates the opportunity to submit this comment about the MTA's Draft Environmental Impact Statement ("DEIS") for the proposed Bus Rapid Transit ("BRT") project on the North Shore. Atlantic is also grateful that the MTA agreed to the request of Congresswoman Malliotakis to extend the comment period. Our friends at Snug Harbor relayed this information to us.

Atlantic is a family-owned and woman-managed business that imports deicing road salt from overseas mines for distribution to New York City, New York State OGS, and many other state and local public safety agencies in the Tri-State area. Atlantic has a very loyal, well-paid work force of diverse backgrounds, and the company's business creates hundreds of indirect jobs derived from the shipping, stevedoring, and salt-delivery operations involved in the road salt supply chain. We have been part of the Staten Island community for the last 46 years. In addition to being an important supplier of deicing salt to NYC, the state, and others, we have hosted community events (ship festivals and several LUMEN festivals) and provided support to local institutions such as the Noble Maritime Collection in Snug Harbor. Atlantic's marine terminal on the New Brighton shoreline is both a Significant Maritime and Industrial Area ("SMIA") and a Priority Marine Activity Zone ("PMAZ") as defined by The New York City Waterfront Revitalization Program ("WRP") (June 2016), the "city's principal Coastal Zone management tool." Id. at 4. As such, Atlantic's marine terminal and maritime business fall squarely within the scope of WRPPolicy 2, which is intended to "Support Water-Dependent and Industrial Uses in New York City Coastal Areas that are Well-Suited to Their Continued Operations." See WRP at 24-32. In a SMIA, "Policy 2.1 [Promote water-dependent and industrial uses in Significant Maritime and Industrial Area] has priority over all other policies of the WRP." See <u>WRP</u> at 25 and map at 99.

Atlantic Salt plays a crucial role in Public Safety and Transportation Resiliency. During the past 10 winter seasons, the company has delivered an average of 518,000 tons of road salt to the city, state, and others who keep roadways in safe working condition during the winter months. Currently, for the 2023-2024 winter that is coming, we have been awarded bids totaling 678,903 tons of salt for two of the City's zones and five NYS OGS road-maintenance areas. Each year the company docks and unloads as many as 20 ocean-going cargo ships that deliver salt from mines as far away as Chile. This pipeline for resupply requires six to twelve weeks of time from our ordering salt to each ship's delivering its cargo to our Staten Island wharf. Despite that timeline, transportation by seagoing ship is more environmentally efficient, and it will become more so as the world's cargo fleet makes pollution-control improvements. With this logistics framework in mind, we have many serious concerns about how the BRT Project is presented in the October 25, 2023, DEIS. It will have a very negative impact upon Atlantic Salt that will "substantially hinder" the achievement of the city's Coastal Zone policies.

<u>The Importance of Cargo-Laydown Space to Satisfy City and State "Just in Time Delivery"</u> <u>Requirements</u>: The DEIS asserts that its proposed BRT design will enable Atlantic "to maximize its business operations." <u>See</u> ES-9. The DEIS further asserts the proposed design will "maximize waterfront access and capacity for salt storage, both of which are essential to [Atlantic's] business function." <u>See</u> 2-17. Maximizing waterfront access and capacity for salt storage is indeed essential to Atlantic's fulfilling its customer obligations, and it must also be understood and emphasized that **maximizing that same salt**  storage capacity is essential to the public safety and transportation resiliency functions of the New York City Department of Sanitation and the NYS DOT for winter deicing and road safety. Health, safety, and the economy are put at risk when city and metropolitan roads are not cleared of snow and ice in a timely fashion. Adequate salt supplies close at hand to the public safety agencies are crucial to reducing those risks.

The DEIS's assertions that its BRT Project will maximize waterfront access and capacity for salt storage are incorrect. Although the DEIS claims on page 3-39 that the BRT Project will not impact Atlantic's "operational functions," **the proposed BRT design will in fact significantly reduce salt storage capacity**. The proposed BRT pathway will significantly reduce the square-footage of cargo laydown space at the western end of the terminal that is immediately adjacent to the shipping berth. The DEIS suggests no solutions for recapturing lost cargo laydown space elsewhere and fails to point out that significant loss of storage capacity at Atlantic's terminal is a significant loss of storage capacity for both the City of New York and the New York State OGS.



*Figure 1: The view on the left is looking west to the cargo laydown area adjacent to the ship berth. The storage capacity of the west end will be severely reduced by the DEIS design. The photo on the right shows a 625-foot-long cargo vessel in the berth.* 

The need for substantial salt storage space on Atlantic's wharf is driven by (a) the "just in time" delivery demands of public-safety agencies, (b) the unpredictable nature of winter weather, and (c) the lack of salt storage space that public safety agencies themselves possess. The NYC Department of Sanitation, the NYS highway districts, and other state and local public safety agencies lack sufficient storage space to have a season's worth of road salt stockpiled in their own sheds and depots. This is especially true in the five boroughs, and it is also true on Long Island and in areas north of NYC. All these agencies need to be resupplied during the average winter, and when they order more salt, they want it delivered quickly. Accordingly, the public safety agencies require Atlantic and other companies to resupply them on very short notice—often only 48 hours, or 72 hours—if public safety supplies are running low or if a major snow and ice event is forecasted. Storms in the forecast can cause dramatic demand spikes.

Storm-driven spikes in road salt demand cannot be met with "just in time delivery" unless a large supply of road salt is on hand within convenient reach of the five boroughs and the nearby counties. Because supplies from the mines take many days to reach New York City, Atlantic can only meet public safety requirements if it maintains a large inventory at its terminal on the North Shore's working waterfront. Unfortunately, the current plan for the BRT Project will have a major negative impact on Atlantic's salt storage capacity. Although the company would like nothing better than to throughput its salt cargoes to end-user storage sheds immediately, the storage sheds internal to the five boroughs and the nearby counties do not have the capacity, and they are unlikely to have it in the future. End users rely on Atlantic's nearby "just in time" inventory, but the BRT Project threatens to jeopardize that function.

<u>The Existing At-Grade Tunnel is Not "Unused</u>:" In addition to the loss of storage capacity that the proposed BRT design will cause, the DEIS erroneously describes the tunnel at Atlantic's location as "unused." <u>See</u> page 21-5 ("an existing, <u>unused</u> at-grade tunnel structure on the Atlantic property"). This description is inaccurate. A significant portion of the structure, at its west end, serves as a garage for the indoor servicing of loaders and other machines by Atlantic's terminal staff. Other portions of the tunnel serve as an indoor area for the storage of supplies.

Three or four loaders can be parked inside the tunnel for service and repairs. Dock work, ship unloading, and delivery truck loading is very hard on these machines. Housekeeping supplies, tools, and other equipment are kept in this space, and the tunnel is a warm, out-of-the-weather place for the mechanics to work. No other space to relocate these functions is readily available or suggested by the DEIS. A new building for this work would further reduce Atlantic's cargo-storage capacity—and be a further substantial hindrance to the achievement of the <u>WRP's</u> Policy 2, Policy 2.1, and other policies.

**Reasonable Alternatives Exist to Fulfill the City's Waterfront Revitalization Goal and Improve Public Transportation:** Atlantic has worked with many city agencies, state agencies, and professional planners for more than ten years to attempt to achieve the city's <u>WRP</u> policy goals while simultaneously addressing the longstanding desire for improved public transportation along the North Shore. In terms of "maximizing waterfront access and essential salt-storage capacity," Atlantic believes the proposals for the Jersey Street/Lafayette Avenue segment of the North Shore that were presented by the NYC Department of City Planning to the West Brighton Community Local Development Corporation and the NYS Department of State with funds under the Brownfield Opportunities Areas Program offer better solutions than the plan proposed in the MTA's October 25 DEIS. The *West Brighton Brownfield Opportunity Area Study* (March 2016) notes at page 119 that the City purchased a 100-foot-wide right of way in 1963 on Richmond Terrace itself and states that the City could:

Capitalize on its 1963 purchase ... to widen the road from Jersey Street to Lafayette Avenue with no additional property purchases or condemnation required. The mapped width of 100 feet, could facilitate ... protected bicycle lands, additional traffic lanes, on-street parking, and a separated bus rapid transit corridor.

<u>See</u> also page 127 ("In 1907, the City mapped Richmond Terrace at a width of 100 feet ostensibly to provide for traffic serving waterfront businesses and communities .... In 1963, the City did acquire the full mapped road width for the approximately .40-mile stretch between Jersey Street and Lafayette Avenue.")

New York City, the MTA, and other project proponents should take advantage of this 100-footwide resource that the city has held unused in its back pocket for 60 years. Use of this right of way would avoid conflict with several state and city policies that aim to promote and improve water-dependent, industrial use of the coastal zone along the North Shore. Putting the proposed BRT down on the level of the Atlantic Salt wharf will conflict with the city's *Waterfront Revitalization Program*. Relocation into the existing street-level 100-foot-wide right of way will avoid that conflict and be more climate resilient. Although we have not had the opportunity to research the point, and while we did not see discussion of it in the DEIS, any federal funding contribution to the BRT Project is likely to place great weight on elevating the BRT out of the flood zone. Embracing the *West Brighton Brownfield Opportunity Area* alternative will meet that need. The West Brighton Brownfield Opportunity Area study involved very extensive community engagement and discussion with the maritime businesses along the North Shore and many city officials and planners. As the study notes, the "vision outlined … for a new, revitalized West Brighton emerged after more than two years of extensive existing conditions analysis and public outreach. <u>Id</u>. at 113. With respect to New Brighton

the community envisioned the redevelopment of a string of strategic sites along Richmond Terrace that would produce a vibrant, mixed-use town center with mid-rise buildings. Accompanying that development is a vision for a new, widened Richmond Terrace with expanded pedestrian sidewalks, protected bicycle lanes, the MTA-proposed Bus Rapid Transit system, and additional traffic lanes and on-street parking to accommodate the needs of residents.

<u>Id</u>. at 113-114. Figure 2 below paints that vision. These pictures are drawn from Image 4.3 and other sources in the *West Brighton Brownfield Opportunity Area* study. Instead of leveraging a valuable resource that the city has owned for 60 years—the 100-foot-wide Richmond Terrace ROW—the DEIS removes the BRT from the neighborhood's street life and hides the BRT in a tunnel that is badly needed to support an ongoing maritime operation. Building the BRT in the existing 100-foot-wide Richmond Terrace ROW will create an active link between BRT riders and the New Brighton neighborhood and probably—by increased visibility—increase ridership from the neighborhood itself. Using the city's existing 100-foot-wide resource will also give riders a view of the active working waterfront in fulfillment of <u>WRP</u> Policy 8. <u>See</u> in particular Policy 8.3 ("Provide visual access to the waterfront where physically practical.")



*Figure 2: The West Brighton Brownfield Opportunity Area study presents this vision of the effective use of the City's 100-foot-wide Richmond Terrace right of way.* <u>See</u> Image 4.3 on page 118 of the study.

<u>The Importance of Efficient and Safe Access</u>: Atlantic requires at least two unimpeded access gates for fully loaded trucks to move from the marine terminal's loading areas onto Richmond Terrace. Currently, the terminal has two entry/exit gates with easy access to Richmond Terrace. The gate at the eastern end of the salt terminal is behind the 15 Bank Street building in Figure 3 below. That gate provides a convenient junction to Jersey Street and then Richmond Terrace. The second entry/exit gate is visible in the middle of Figure 4. It provides a direct connection to Richmond Terrace midway between Lafayette Avenue to the west and Franklin Avenue to the east.

Multiple gates are needed first for safety and secondly for operational flexibility. If one gate is blocked for any reason, another point of access is needed so that personnel, customers, fire trucks, police vehicles, Coast Guard vehicles and other first-responders always have at least one way into and out of the terminal. Multiple gates also are needed to allow changes in delivery truck movements to adapt to changing stockpile layouts, ship unloading requirements, and other cargo-handling operations.

Atlantic also objects to the implication in DEIS Appendix E, the "Basis of Design Report," that the marine terminal can function over the long term with only one entry/exit gate. Page 18 of Appendix E states:

A land swap would include the remaining lower-level building space that also serves to support Richmond Terrace along the building's 840-foot length and would be owned and maintained by NYC. Atlantic Salt's access at Richmond Terrace could be maintained with construction of <u>a ramp over the BRT alignment to be constructed by the private property owner</u>. (Emphasis added.)

That suggestion—buried in the middle of Appendix E—is a bad idea that is unfair to boot. Additionally, the vague rendering of such a ramp in Figure 2-8 on page 2-18 of the DEIS suggests that the ramp was inserted into the proposed design without thorough analysis of engineering, safety, cost, or impact on the remaining cargo laydown area at the terminal. The ramp indicated in DEIS Figure 2-8 will not maximize salt-storage capacity. It will cause another large increment of such space to be lost.

Atlantic Itself Has Continually Made Substantial Investments to Preserve the Shoreline, Maximize Cargo-Storage Capacity, and Revitalize the Working Waterfront: As noted, Atlantic Salt has been a corporate resident of Staten Island's North Shore community for more than 45 years. Over that time—aside from its community events and support of local institutions—the company has consistently made large capital investments to maintain and revitalize the marine terminal. These multi-million-dollar efforts—part of a long-term, privately funded campaign that harmonizes with the goals of the *New York City Waterfront Revitalization Program* and state coastal zone policies—include:

- From 2002 through 2006, the removal—after asbestos abatement and other mitigation—of seven worn out structures overhanging the waterfront.
- From 2008 through 2009, the construction of steel bulkheads and rip-rap slopes to curtail the erosion at the western half of the site and to provide a modern docking and cargo-handling facility for salt ships. This effort also included the dredging of the ship berth.
- From 2011 through 2012, the removal of the last worn-out concrete building on the water's edge.
- In 2014 to 2015, the acquisition of the 15 Bank Street building and its paved area.
- In 2018 to 2019, the reduction of the 840-foot-long Richmond Terrace structure to street level.
- In 2023, the acquisition of 7-9 Bank Street.

• Currently in the planning stage, the repair of the shoreline from the 15 Bank Street building westward toward the middle of the terminal.



Figure 3: Looking south. 7-9 Bank Street is a potential cargo laydown area that might play a role in the "support vessel port" described on page 7 below. 15 Bank Street, owned by Atlantic's subsidiary, is a prospective "maritime hub" as shown in Figure 7.



Figure 4: The western half of the Atlantic terminal. The garage occupies a long section of the tunnel. The removal of the upper stories of the 840-foot-long building removed some hazards while creating an opportunity for views from a BRT at street level.



Figure 5: This plan has been developed to repair the eastern half of the Atlantic shoreline to preserve terminal space and to resist the erosion caused by strong tidal forces and heavy ship and tugboat traffic in the Kill Van Kull.

As the DEIS correctly notes, "larger vessels passing through the Kill Van Kull as a result of the Bayonne Bridge modification are anticipated to further exacerbate erosion. At present, the right-of-way and bulkhead in the vicinity of Sailors' Snug Harbor has sustained substantial storm damage and has largely been submerged by the Kill Van Kull." <u>See</u> DEIS at 459. Although not mentioned in the DEIS, plans are already afoot to deepen the navigation channel in the Kill Van Kull another five feet. This is likely to result in widening of the navigation channel and an increase in traffic by mega-container ships. The forces of erosion on the North Shore are likely to grow. <u>See</u> New York and New Jersey Harbor Deepening Channel Improvements Navigation Study Final Integrated Feasibility Report and Environmental Assessment, United States Army Corps of Engineers, New York District (April 2022) available at

<u>https://www.nan.usace.army.mil/Portals/37/NYNJHDCI\_Final\_Integrated\_Report-May2022.pdf</u> (visited November 21, 2023). Atlantic is planning to invest once again to mitigate that channel-widening impact and preserve the SMIA.

<u>The Project Needs to Provide Genuine Support to Significant Maritime Industrial Areas: Atlantic</u> <u>Is Doing this with a Project Aimed at Supporting the Offshore Wind Industry</u>: The DEIS correctly notes that the BRT Project is subject to New York State coastal policies and to the *New York City Waterfront Revitalization Program*. <u>See</u> page 3-28. Policy Two of the WRP calls for "Support[ing] water-dependent and industrial uses in New York City coastal areas that are well-suited to their continued operation." Policy 2.1 seeks to "promote water-dependent and industrial uses in Significant Maritime and Industrial Areas," and Policy 2.3 seeks to "encourage waterfront uses at appropriate sites outside the" SMIAs. Atlantic hopes to achieve all those goals with both its existing operation and a potential new maritime operation at its 15 Bank Street location.

An important maritime activity for the North Shore of Staten Island will be the development and enhancement of maritime terminals with the capacity to support aspects of the offshore wind industry. Atlantic has directed some of its investments toward that goal. The DEIS, by shrinking Atlantic's cargo handling and storage space while ignoring the reasonable alternative of deploying the city's 100-foot-wide right of way on Richmond Terrace for BRT use, raises the specter of interfering with maritime goals.



Figure 6: Conceptual docking facility of Offshore Wind support vessels at Atlantic's 15 Bank Street subsidiary.

An Atlantic subsidiary owns the 15 Bank Street property that occupies the shoreline between Atlantic's eastern gate and Jersey Street and further east. This part of the New Brighton shoreline had an active, century-long connection to the waterway as a location for the importing and distribution of coal, oil, and other bulk materials. It was also the landing for the North Shore Staten Island Ferry Company. Atlantic, in conjunction with a participant in offshore windfarm development, has created a conceptual design to use the 15 Bank Street property for the docking and support of vessels that service offshore windfarms. These small vessels include crew transfer vessels (CVT), service operation vessels (SOV), and

field development vessels (FDV). <u>See</u> "Offshore Wind Support Vessels," <u>https://www.dco.uscg.mil/OCSNCOE/ORE-Support-Vessels/Types/</u> (accessed November 20, 2023). This docking and support facility would provide new jobs and other benefits to the Staten Island community. Maintaining safe and efficient access at Jersey Street and Bank Street and revitalizing the waterfront infrastructure are crucial not only to the continued operation of the Atlantic Salt terminal. They are crucial to the future maritime development of the North Shore and consistent with the policy that "New York City's working waterfront is vital to the city's economy." <u>See WRP</u> at Policy Two, page 23.

<u>Better Maps and More Complete Renderings</u> would make the BRT Project and the impact analysis more transparent and more user friendly. The materials published online are massive. There is no set of detailed maps in an easily found, accessible location in the documents. Many of the renderings are incomplete and somewhat difficult to interpret. The "Proposed Alignment through Atlantic Salt" at Figure 2-8 is only part of the story affecting Atlantic, and it makes potential impacts difficult to evaluate fully.



Figure 7: Snug Harbor view of the waterway at page 9-38 of the DEIS.

Snug Harbor is an important cultural and historical resource for Staten Island, all of New York City, and the country. Atlantic Salt has been a long-time supporter of the Noble Maritime Collection, a part of the Snug Harbor campus. Snug Harbor's connection to the waterfront is an important, fundamental part of its history. Reading the DEIS, however, makes it difficult to understand how that connection will be recognized and maintained by the BRT Project. Whether or not Snug Harbor will have any view of the Kill Van Kull is questionable, and the visual at DEIS Figure 9-11 (Figure 7 above) is difficult to interpret.

Atlantic has a successful track record of free festivals that provide access to the waterway and promote the public's knowledge of the North Shore's working waterfront: Periodically, as opportunities arise, Atlantic Salt hosts tall ship visits and free-of-charge festivals that provide an opportunity for the New Brighton neighborhood and the North Shore community at large to visit the facility, take in fascinating views of the Kill Van Kull, board vessels, and talk to mariners. Free food for all and games for the children are a part of these events.

In 2006, in conjunction with the Noble Maritime Collection at Snug Harbor, Atlantic sponsored a group of painters, photographers, and other artists to "interpret" the company's working waterfront operation. Noble Maritime hosted an exhibition of the art works called "Salt Mountain." An auction raised money for the museum.



Figure 8: On the left is the poster for the 2009 festival when Atlantic hosted the replica of Henry Hudson's Half Moon. In 2015, Atlantic hosted the visit of the Coast Guard's tall ship Eagle.

In August 2009 Atlantic hosted the replica of Henry Hudson's vessel *Half Moon*. The festival was open to the public. As reported in *The Staten Island Advance*, "The family fare—all of it free—includes tours of both vessels, food, beverages 17th-century games, and kiddie rides, music, dance performances, sprinklers." (August 29, 2009). Preceding the festival, the company hosted a dinner on the wharf for the Staten Island Chamber of Commerce. Mayor Bloomberg made an appearance and spoke to the gathering. In addition to vessels like the *Half Moon*, Atlantic has also hosted visits from other tall ships, including the U.S. Coast Guard's training vessel *Eagle* in 2015.



Figure 9: The top row contains images from various LUMEN festivals. The bottom row documents a festival that included a visit from an FDNY fire boat, a Coast Guard cutter, and another tall ship.

The company has hosted the Staten Island Arts' LUMEN festival on several occasions. The festival is a nighttime event on the waterfront involving projected art, installations, videos, and performances. An

estimated 4,000 people attended the 2016 festival, making it an exciting night for the community and a successful fundraiser for the arts. <u>See</u> "Final count: LUMEN attracts record-setting 4,000 art-lovers to North Shore," *The Staten Island Advance* (June 28, 2016). The article is available online at <a href="https://www.silive.com/entertainment/2016/06/lumen">https://www.silive.com/entertainment/2016/06/lumen</a> festival saw record-slam.html.

**Conclusion:** Atlantic Salt looks forward to further discussion and analysis of this important but complex project. Atlantic is very concerned that the proposed pathway of the BRT Project will have a harmful adverse impact on the company's ability to meet the inventory requirements and "just in time delivery" requirements of New York City's and NYS DOT's snow and ice fighting departments. Implementing the BRT Project as described in the DEIS attempts to solve one area transportation problem at the risk of seriously compromising crucial logistics that support city-wide and regional winter road safety. Some transportation improvement along the North Shore might be accomplished, but at the cost of impairing Atlantic Salt's ability to play an effective role in public safety and metro-wide transportation resiliency needs. The BRT design proposed in the DEIS is not compliant with the city's coastal zone management requirements.

#### ATLANTIC SALT, INC.

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#### A Statement from Borough President Vito Fossella on the Staten Island North Shore BRT

We support any effort to help improve the commute for Staten Islanders on the North Shore.

In light of the potential upcoming study, we urge the MTA to consider some of the issues raised by the nearby community such as the possible elimination of a number of parking spots along Richmond Terrace, and its impact on Snug Harbor.

#### Staten Island Community Board 1

Transportation Committee Joseph Bird, Christopher Campbell, Katheleen Coen, Anthony Cosentino, Radhakrishna Mohan, Josh Renta, Catherine Schiavone, Sean Sheil, Siyda Williams Chair: Nicholas Zvegintzov

Virtual Report of December 12, 2023

#### Motion for the Board

Comment by SI CB1 on the North Shore BRT Draft Environmental Statement

File at <a href="https://new.mta.info/project/staten-island-north-shore-bus-rapid-transit">https://new.mta.info/project/staten-island-north-shore-bus-rapid-transit</a> by December 22, 2023.

Also send to Mayor and Councilmember, State electeds, US Representative.

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Staten Island Community Board 1 had already commented on the *Final* Scoping Document on June 11, 2019, and finds that its objections have not been met in the October 2023 Staten Island North Shore BRT DEIS, and re-states and extends them here.

CB1 supports the North Shore BRT to enhance community development and reduce existing commute times.

CB1 urges the MTA to collaborate with City, State, and US Government to complete the design for terminating the BRT in the existing SIRT station at St. George. This design was improperly ignored in the DEIS.

The proposed routing into the bus terminal via Richmond Terrace is absolutely unacceptable for multiple reasons: Increasing instead of decreasing transit times, eliminating parking, bus stops, and bike lane, adding to traffic obstruction, and retarding circulation instead of easing it.

The DEIS seeks to support the on-street routing by releasing Appendix B: St. George Terminal Access Evaluation. Its entire analysis is: 'Based on the initial review conducted as part of this screening effort and in consultation with New York City Department of Transportation, it was determined that an alignment that travelled beneath the Ferry Terminal and its associated retail corridor was not considered feasible primarily due to security restrictions and to a lesser extent the inability to relocate critical equipment.' ( p. 33)

The EIS is required to examine all the impacts of the design decisions by objective criteria. The unsupported opinion of a Department at any level of government is inadequate to establish security impacts. Marine Security implications of the BRT terminal station options should have been examined according to the Marine Security standards set up by the US Department of Homeland Security and with the support of USDHS staff.

In particular the impacts of each individual option 2, 3, and 4 should have been examined individually since they are not equivalent in their impacts. For example, Option 2 has its station approaches and its platforms and staging areas outside the existing MarSec perimeter with a less than 20' corridor between them to be assessed for Marine Security (Fig 6, p. 14.)



Figure 6 – Option 2

(Appendix B St George Access Evaluation-27.jpg)

Options 2, 3, and 4 must be assessed to complete the EIS, and selection including them needs to be considered in order to avoid adverse environmental impacts and costs of the alternative on-street routes.

In Option 2, we recommend making the terminal loop in the anticlockwise direction. This will avoid conflicts with driving on the right. The on-street segment from Nicholas St. to the entrance to the Ferry Terminal, comprising six lanes of traffic (seven at several turning lanes), presents multiple problems:

- Increasing instead of decreasing transit times.
- Eliminating parking, bus stops, and bike lane.
- Eliminating 250 parking spaces from Nicholas Street to the Ferry Terminal will create parking hardships for individuals (especially the handicapped) and burdens to businesses that depend on Richmond Terrace's street parking for patrons.
- Decreasing amenity by presenting a traffic wall between the waterfront esplanade / Ferry Terminal and Staten Island's civic center / 'downtown'.
- Blocking entrance to Borough Hall, the County Building, the 120 Precinct, Family Court, the Ballpark, and the Empire Outlets.
- Blocking automobile entrance to both commercial parking garages.
- Presenting a traffic wall to passengers moving from Staten Island's civic center to and from the Ferry Terminal.

The cost analysis of 'preferred' alternative does not impute the going-forward costs of the degraded transportation environment, especially street access to SI's most-traveled transportation node, thus under-costing this alternative.

The DEIS dismisses these costs: 'Significant adverse impacts are anticipated to traffic movements at 19 different intersections during one or more analyzed time periods. Significant adverse impacts are anticipated at two sidewalk locations. Approximately 250 on-street parking spaces along Richmond Terrace between Bay Street and Nicholas Street would be eliminated to accommodate the proposed busway (except for the 90-degree parking on Richmond Terrace associated the NYPD 120th Precinct); however, off-street parking would have capacity to accommodate the on-street shortfall.' (p. E-16)

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Nicholas Zvegintzov, Chair

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November 22, 2023

Re: MTA Draft EIS for Proposed Staten Island North Shore BRT

To whom it may concern,

These comments are regarding the draft Environmental Impact Statement issued by the MTA's Bus Rapid Transit system for the North Shore of Staten Island. I am a 20-year resident of the North Shore (Assembly District 61, Senate District 23, NY City Council District 49) and I have grave concerns about the impact of this plan on the crown jewel of our district, Snug Harbor Cultural Center & Botanical Garden.

Founded in 1977, Snug Harbor Cultural Center & Botanical Garden ("Snug Harbor") is the result of one of the largest adaptive reuse projects in America: turning a 19<sup>th</sup>-century charitable rest home for "aged, decrepit and worn out sailors" into a thriving center of community culture and connection, history and resiliency. Snug Harbor's connection to the waterfront is integral to its identity, and as such is a centerpiece of the 2020 New York City-funded Master Plan. Snug Harbor has secured FEMA support to design a new dock, to replace that which was destroyed by Superstorm Sandy in 2012. The wheels of federal funding turn slowly indeed, and this funding was finalized in July of this year – well before the release of this Draft EIS.

This plan would completely obliterate Snug Harbor's historic connection to the waterfront and alienate more than two acres of parkland. This is unacceptable. Snug Harbor is on the National Register of National Historic Places, part of New York State's Harbor Park, and home to several of the first structures to be designated by the New York City Landmarks Commission. This plan furthermore does not appear to align with the recently released North Shore Waterfront Redevelopment Plan issued by Council Member Kamillah Hanks, or with Mayor Adams' proposed Greenway running between the Goethals and Verazzano Bridges.

As a long-time North Shore resident, I recognize the need for increased and improved transportation options for our community. I do not believe this plan will be effective, and I am concerned about the Severe Adverse Impact on our community. I urge the MTA to rethink this, and to involve the community in planning.

Sincerely,

Martha Neighbors



2 Broadway, 16th Floor, New York, NY 10004 (212) 878-7087 mail@pcac.org LISA DAGLIAN EXECUTIVE DIRECTOR KARA GURL PLANNING & ADVOCACY MANAGER JACK CONNORS RESEARCH & COMM. ASSOCIATE JESSICA SPEZIO ADMINISTRATIVE ASSISTANT

# Permanent Citizens Advisory Committee to the MTA Public Comment in Support of MTA's North Shore BRT Draft Environmental Impact Statement

## November 24<sup>th</sup>, 2023

To whom it may concern,

Thank you for the opportunity to submit public comment regarding the North Shore Bus Rapid Transit Draft Environmental Impact Statement in support of this critical project that will improve transit access.

As rider representatives and trusted advisors to the MTA, the Permanent Citizens Advisory Committee to the MTA (PCAC) regularly researches issues, recommends viable solutions, and advocates on behalf of the region's MTA riders, including those who use the Staten Island Railway and buses that serve Staten Island.

Thousands of New Yorkers depend on bus connections to and from ferries on the North Shore to get around the borough, whether they live or work on Staten Island. This includes many who make the long commute from the St. George Ferry Terminal to JFK8, the Amazon Fulfillment Center. With a higher population density and a lower rate of car-ownership than the borough overall, Staten Island's North Shore is perhaps the most transit-dependent part of the borough. Despite this, the North Shore has for decades been drastically underserved by MTA service. The existing deficits on the North Shore's bus routes (the S40/S90, S44/S94, S46/S96, and S48/S98) are well known: severe overcrowding during peak commute periods; a lack of convenient transfers to other modes; and most bus trips running five or more minutes late.

The status quo is simply unacceptable, and North Shore Bus Rapid Transit would help ensure that more New Yorkers can depend on transit on Staten Island. In moving forward with this project, the MTA would recognize this and right the wrong created by the closure of the North Shore Branch in 1953— making good on its promise to better serve Equity Areas. The North Shore BRT would also help advance economic development activity on Staten Island, including the New York City Economic Development Corporation's "Staten Island North Shore Action Plan."

Between now and the target build date of 2035, we hope the MTA will study other projects that will complement this effort and deliver long-sought transit connections between Staten Island and New Jersey's Hudson, Essex, and Union Counties, as well as New York City. To do so, we recommend the MTA:

- Improve existing Staten Island Railway service and stations, including installing loudspeakers at stations to provide real-time updates and information.
- Study the feasibility of extending the Hudson-Bergen Light Rail to the eventual Elm Park/Morningside Road North Shore BRT stop using the Bayonne Bridge, which was constructed with the possibility of adding rail in mind. This could be funded and operated by the Port Authority, the bi-state agency charged with advancing projects that better connect and serve New York and New Jersey.
- Work with the Port Authority to provide bus service between West Shore Plaza and Newark Liberty International Airport.
- Partner with local stakeholders to advance the goals outlined in the Staten Island North Shore Action Plan: enhancing station-adjacent land use and ensuring Staten Islanders can access housing near North Shore BRT stops.
- Ensure that North Shore BRT service is provided 24/7, 365 days a year.
- Coordinate bus schedules along the North Short BRT alignment to ensure timed connections to the Staten Island Ferry, Staten Island Railway and local bus routes, as described on page 2-33.
- Improve existing Express Bus service to get residents from other parts of Staten Island into and out of Manhattan more easily and reliably, to ensure that residents have viable transit options for reaching the Central Business District, particularly as Congestion Pricing begins.

Thank you again for the opportunity to submit public comment. We look forward to seeing this project come to life and improve access to opportunities for residents of Staten Island and beyond.