

**A. INTRODUCTION**

This chapter summarizes and responds to all substantive comments on the Draft Environmental Impact Statement (DEIS) received during the public comment period and through December 1, 2000. Public review began on May 17, 2000, with the publication of the DEIS. The Metropolitan Transportation Authority (MTA) held a public hearing on June 15, 2000 at 347 Madison Avenue, fifth floor boardroom. The public comment period was held open until July 12, 2000, and all comments received through December 1, 2000, were also considered.

The DEIS was circulated to involved and interested agencies and other interested parties, and notice of its availability and of the public hearing was published in the Federal Register on May 26, 2000. In addition, postcards indicating that the DEIS was available and that the public hearing would be held were circulated to some 5,000 households. To advertise the public hearing, MTA published notices in newspapers of general circulation as well as community and minority newspapers throughout the area. These included *Newsday*, *The Journal News*, *Connecticut Post*, *Yankee Trader*, *The Queens Chronicle*, *The Amsterdam News*, and *El Diario-La Prensa*. MTA also posted advertisements for the hearing in MTA commuter railroad stations and performed seat drops with notice of the hearing on both Long Island Rail Road (LIRR) and Metro-North Railroad (MNR) commuter trains.

This chapter identifies the organizations and individuals who commented on the DEIS, then summarizes and responds to their comments. Comments made throughout the comment period as well as comments received after the close of the comment period but through December 1, 2000 are included. Section B, below, lists all individuals and organizations who made comments on the DEIS. These are listed in the order the comments were received, beginning with the comments made at the public hearing and continuing with other written statements submitted. Section C contains a summary of all comments made. The comments are organized by subject area, following the organization of the EIS. All comments on the Long Island storage yards are grouped together following those on project alternatives. Where similar comments on the same subject matter have been made by more than one person, a single comment summarizes all comments on that issue. Following each comment is a list of people or organizations who made the comment. These comments are keyed to the copies of the transcript of the public hearing and of all written comments received that are included in an appendix to this document. For example, a comment noted as "Doe 1" would be the first comment made by John Doe, and the location in the hearing transcript or Mr. Doe's comment letter where that comment can be found would be marked with the number "1".

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\* Note: This entire chapter is new to the FEIS.

Where appropriate, the body of this Final Environmental Impact Statement (FEIS) is revised in response to comments received. Changes to the document since publication of the DEIS are indicated by *italics* in a different font than the rest of the document.

## **B. LIST OF GROUPS AND INDIVIDUALS WHO COMMENTED ON THE DEIS**

Comments were received at the public hearing on June 15, 2000. In addition, written comments were submitted throughout the 45-day comment period and continuing through December 1, 2000. Commenters are listed below.

1. Larry Silverman, Long Island Rail Road Commuters Council, comments made at public hearing.
2. John Steinberg, for Carlisle Towery, President, Greater Jamaica Development Corporation, comments made and written testimony submitted at public hearing.
3. Lisa Schreibman, Tri-State Transportation Campaign, comments made and written testimony submitted at public hearing.
4. Dean Angelakos, New York Building Congress, comments made and written testimony submitted at public hearing.
5. Lucy Mayo, for the Office of New York State Senator Thomas Duane, comments made and written testimony submitted at public hearing.
6. Jeffrey Zupan, Regional Plan Association, comments made and written testimony submitted at public hearing.
7. Richard Gualtieri, comments made at public hearing.
8. Gene Russianoff, NYPIRG Straphangers Campaign, comments made and written testimony submitted at public hearing.
9. Irwin Fruchtmann, comments made at public hearing and written testimony submitted at public hearing.
10. Louis P. Venech, Senior Manager, Transportation Policy Development, Office of Policy & Planning, Port Authority of New York & New Jersey, comments made at public hearing and letter dated July 12, 2000.
11. Jeff Elmer, General Contractors Association, comments made and written testimony submitted at public hearing.
12. Barry Adler, comments made at public hearing.
13. Herbert Landow, comments made and written testimony submitted at public hearing.
14. Robert Schumacher, comments made and written testimony submitted at public hearing.
15. George Haikalis, Committee for Better Transit, comments made and written testimony submitted at public hearing, and letter dated July 12, 2000.
16. Lester Epstein, Owner, 47 East 44th Street, comments made and written testimony submitted at public hearing.

17. Danny Pearlstein, comments made at public hearing.
18. John Cornelius, Bowne Park Civic Association, comments made at public hearing.
19. Ron Troy, comments made at public hearing.
20. Kristin Harrison, for the Office of U.S. Congresswoman Carolyn Maloney, comments made at public hearing.
21. Joel Azumah, comments made at public hearing.
22. Louis Hitch, comments made at public hearing.
23. Robert Olmstead, comments made at public hearing.
24. John Landers, comments made at public hearing.
25. Chung-Kuo Chiang, Ph.D., PE, New York State Department of Transportation, memorandum dated May 24, 2000.
26. Thomas S. Gulotta, County Executive, Nassau County, letter dated May 31, 2000.
27. Steven Ausnit, letter dated June 6, 2000.
28. Ron M. Aryel, MD, MBA, letter received June 7, 2000.
29. Patricia Zedalis, Chief Executive for School Facilities, New York City Board of Education, letter dated June 12, 2000.
30. Claire Shulman, President, Borough of Queens, letter dated June 13, 2000.
31. Mitchell Pally, Long Island Association, letter dated June 13, 2000.
32. New York State Senator Dean G. Skelos, written testimony dated June 15, 2000.
33. David E. Buerle, Coastal Resources Specialist, New York State Department of State, Division of Coastal Resources, letter dated June 15, 2000.
34. Joshua L. Schank, Transportation Planner, Permanent Citizens Advisory Committee to the MTA, memorandum dated June 20, 2000.
35. New York State Assemblywoman Catherine Nolan, letter dated June 28, 2000.
36. Richard C. Visconti, R.A., Acting Commissioner, New York City Department of Buildings, letter dated June 29, 2000.
37. Julian W. Adams, Senior Historic Sites Restoration Coordinator, New York State Office of Parks, Recreation and Historic Preservation, letter dated July 7, 2000.
38. Joseph B. Rose, Chairman, City Planning Commission, City of New York, letter dated July 7, 2000.
39. Daniel A. Nigro, New York City Fire Department, letter dated July 7, 2000.
40. Walter R. Ernst, General Manager, Metropolitan Division, Amtrak, letter dated July 11, 2000.
41. Richard H. Salmon, Jr., letter dated July 11, 2000.

42. David E. Buerle, Division of Coastal Resources, New York State Department of State, letter dated July 12, 2000.
43. Stephen B. Dobrow, Committee for Better Transit, Inc., letter received July 13, 2000.
44. Robert W. Hargrove, Chief, Strategic Planning and Multi-Media Programs Branch, United States Environmental Protection Agency, Region 2, letter dated July 14, 2000.
45. Willie R. Taylor, Director, Office of Environmental Policy and Compliance, United States Department of the Interior, letter dated July 17, 2000.
46. Joshua Laird, New York City Department of Parks and Recreation, letter dated July 19, 2000.
47. Jeffrey A. Warsh, Executive Director, NJ Transit, letter dated July 19, 2000.
48. Members of the Greenlawn/Huntington, Babylon, and Riverhead communities, approximately 300 letters received July 21, 2000 and later.
49. Kevin M. Gary, resident of Greenlawn, letter dated July 21, 2000.
50. Mark Cuthbertson, Councilman, Town of Huntington, letters dated July 26 and August 1, 2000.
51. Charles de Quillfeldt, Regional Permit Administrator, New York State Department of Environmental Conservation, Division of Environmental Permits, Region 2, letter dated July 27, 2000.
52. Allan H. Goldberg, Assistant Commissioner for Bureau Management, Regulatory and Environmental Health Sciences, The City of New York Department of Health, letter dated August 2, 2000.
53. Gina Santucci, The City of New York Landmarks Preservation Commission, Environmental Review, comments dated August 3, 2000.
54. Keith A. Archer, Morton Weber and Associates, Attorneys at Law, letter dated August 7, 2000.
55. Robert W. Ramage Jr., resident of Huntington, letter dated August 8, 2000.
56. Owen H. Johnson, Vice President Pro Tempore, New York State Senate, letter dated August 30, 2000.
57. Henry L. Barton, Jr., Clerk of the Legislature, letter dated September 19, 2000 (enclosing a sense resolution adopted by the Suffolk County Legislature on September 12, 2000).
58. Gene Gaye, resident of Huntington, letter dated October 6, 2000.

## **C. RESPONSE TO COMMENTS**

### **EXECUTIVE SUMMARY**

- Comment 1:** Table S-3 should be modified to include the matters described in Amtrak's comments. For example, "Construction Impacts: Transportation," should describe the potential impacts to Amtrak as described above, or, preferably, the mitigation to be provided so that Amtrak service and operations will not be

impacted. No mitigation should be included under the assumption that Amtrak will pay for it. Under "Property Acquisitions," note should be made of the need to relocate numerous Amtrak facilities at Sunnyside Yard, and whether the plan is for permanent or temporary relocation. Other changes should be made to conform the summary with the comments noted above. (Ernst 38)

**Response:** The Executive Summary of the FEIS has been revised to be consistent with all other changes made to the body of the document.

### **PROJECT PURPOSE AND NEED**

**Comment 2:** We support the East Side Access Project as part of the broader regional campaign to expand the role of the commuter rail network in meeting transportation needs. The Access to the Region's Core (ARC) team has worked with the East Side Access Project team so that ARC complements East Side Access. Activating the 63rd Street Tunnel is not just a convenience for LIRR riders, but a step in solving the broader problem of providing adequate commuter rail capacity to Midtown. There is no long-term answer for the problems at Penn Station without opening a second facility for LIRR in Manhattan, as this project would do. At the same time, the East Side Access Project protects the possibility for a future connection between Grand Central and Penn Station, which may be proposed as part of ARC. Please make sure that the final design of East Side Access continues to protect this possibility. (Venech 1)

**Response:** Comment noted. The preferred design option reflected in the FEIS (Option 2) would protect the possibility for a future connection between Grand Central Terminal (GCT) and Penn Station.

**Comment 3:** The East Side Access Project also complements the MTA/Port Authority partnership providing new options for access to John F. Kennedy International Airport (JFK). When LIRR service becomes available at GCT, JFK passengers will have a choice of accessing the service from two midtown locations. The capacity expansion for the network will facilitate the eventual provision after this project is complete of one-seat service to JFK. (Venech 2)

**Response:** Comment noted.

**Comment 4:** Numerous commenters expressed their general support for the project. (Silverman 1, Steinberg 2, Angelakos 2, Elmer 2, Hitch 3, Olmstead 6, Landers 1, Pally 1, Skelos 1, Schank 15)

**Response:** Comments noted.

**Comment 5:** Numerous commenters described the benefits of East Side Access and reasons why the project should be constructed. (Silverman 2, Steinberg 1, Schreibman 3, Troy 4, Pally 2, Rose 2)

**Response:** Comments noted.

**Comment 6:** Numerous commenters described the benefits of East Side Access and gave their conditional support for the project. (Silverman 2, Duane 3, Zupan 6, Russianoff 7, Dobrow 1, Rose 1)

**Response:** Comments noted.

**Comment 7:** The current commute from Long Island to the East Side of Manhattan is horrendous (as is the commute on the Lexington Avenue No. 6 subway). (Troy 2)

**Response:** Comment noted.

**Comment 8:** Several commenters described the history of project. (Zupan 5, Hitch 3, Olmstead 2)

**Response:** Comments noted.

**Comment 9:** It is not entirely true that the East Side Access Project is a suburban project. The project increases access to jobs in Manhattan's core, thus strengthening the city's economic base. In addition, the project can provide additional service to underserved areas of Queens (which, along with Brooklyn, is also on Long Island). (Olmstead 5)

**Response:** Comment noted. The DEIS notes that the project would benefit the entire region.

**Comment 10:** The project would disproportionately benefit certain suburban commuters at the cost of city residents. (Gualtieri 1, Russianoff 1, Pearlstein 3)

**Response:** The East Side Access Project would benefit the entire New York metropolitan region, not just certain suburban commuters (see also the comment above). In addition to the commuters from Long Island who benefit from improved trips to the city, the project would also benefit residents of New York City as well. These benefits would include the following:

- Support for the continued growth of jobs in Manhattan and the regional economy, which is driven by the Manhattan CBD. The East Side Access Project is one of a number of Long Range Planning Framework projects that seeks to improve transportation connectivity within the New York Metropolitan Region, an important factor in keeping Manhattan competitive as a national and global center of commerce.

- Reduced crowding on Queens-Manhattan and West Side subway lines. During the AM peak hour in 2010, 1,185 fewer riders would board the Manhattan-bound No. 7 Flushing line, which currently operates close to capacity during peak periods. The project would also remove approximately 6,000 riders on the northbound, or uptown, A/C/E lines in the AM peak hour alone in 2010, as well as approximately 700 passengers on the 1/2/3/9 lines at 34th Street.
- Increased service to LIRR stations in eastern Queens. The Preferred Alternative would increase peak hour service on the Port Washington Branch, which serves nine stations in Queens, as well as to other stations in Queens on the Main Line and Babylon Branches and other branches with stations in Queens. Service from Jamaica to the entire the East Side of Manhattan, as well as to points north of Manhattan, would be streamlined via a connection between Jamaica and the subway and MNR at GCT. Furthermore, connection to the LIRR at GCT would improve the ability of reverse commuters who live in New York City to access jobs in eastern Queens and in Nassau and Suffolk Counties.
- Significant reductions in traffic. The Preferred Alternative would reduce daily vehicle miles traveled in New York City by almost 230,000 by 2020. This is in comparison with a reduction of almost 145,000 in the “suburbs” of Nassau County and Suffolk County. Fewer cars would use city streets and there would be less congestion on major river crossings into Manhattan. These congestion reductions benefit city residents and businesses alike.
- Significant reductions air pollution as a result of reductions in vehicle miles traveled. New York City residents would experience reductions in regional mobile source pollutants on the order of hundreds of tons per year. More than two-thirds of these pollutant reductions would occur within New York City.

**Comment 11:** Chapter 1, page 1-5, Table 1-1 adds up to 101 percent, not 100 percent. (Chiang 3)

**Response:** This table adds to 101 percent because of rounding.

**Comment 12:** The East Side Access Project should coordinate with regional entities such as New Jersey Transit (NJ Transit), Amtrak, and sister agencies to prevent the duplication of equipment and services and investigate through-running NJ Transit and LIRR trains at Penn Station. (Azumah 3; Schumacher 4)

**Response:** As described in the EIS in Chapter 1, “Project Purpose and Need,” (see page 1-19) and in Chapter 23, “Process and Public Participation,” the project has coordinated extensively with regional transportation entities, including Amtrak and NJ Transit. Further, the project includes a new rail station at Sunnyside, Queens, that can be used not only by LIRR but also by NJ Transit and Amtrak. Through-running of NJ Transit and LIRR trains is being investigated

by the Port Authority of New York & New Jersey (PANYNJ) as part of its ARC study.

**Comment 13:** This project should be coordinated with and move forward in conjunction with the Air Train Project. (Cornelius 1)

Kennedy Airport Access is an important component of the plan developed by the Committee for Better Transit. With LIRR access completed in 4 to 5 years, instead of 11, a direct one-seat ride to Kennedy Airport could be offered from GCT, avoiding the costly Port Authority shuttle link. CBT takes strong exception to two points raised by LIRR planners: 1) that the East Side Access Project is for the exclusive use of LIRR commuters, and 2) that peak hour capacity constraints preclude direct operation of express trains to Kennedy Airport. (Haikalis 6)

The East Side Access Terminal is the best starting point for another important link in the city's transit system—a one-seat rail trip from Manhattan to John F. Kennedy International Airport. The DEIS should evaluate an alternative scenario that includes a one-seat ride to JFK from the new East Side Access terminal. At the very least, the new terminal should be built in a way that would accommodate a one-seat ride to JFK in the future. Unless the DEIS is revised to include consideration of a one-seat ride to JFK, the public and decision-makers will be denied an opportunity to fully evaluate and comment on the potential effects of the proposal. (Rose 3)

The DEIS should evaluate how the proposed action would affect the potential to provide a one-seat ride to JFK in the future. In the DEIS, peak-hour forecasts indicate that all 24 LIRR trains using the 63rd Street Tunnel and servicing Grand Central Terminal would be devoted to increasing LIRR commuter service under the proposed action. This would preclude the possibility of providing a one-seat ride to JFK from Grand Central. (Rose 4)

**Response:** As described in the DEIS in Chapter 1 (see pages 1-24 and 1-25), the East Side Access Project is coordinating with PANYNJ's Air Train Project, which involves a light rail link from the Howard Beach subway station on the A line to John F. Kennedy Airport, and a connection between the airport and both LIRR and MTA New York City Transit (NYCT) service at Jamaica station in Queens. This intermodal transportation center at Jamaica is due to be completed in 2003. The East Side Access Project would ensure that all improvements required at Jamaica station for the additional LIRR service would be compatible with the Air Train Project. Further, the new control room required for the Air Train at Jamaica is being designed as a dual facility shared by LIRR and PANYNJ.

The Preferred Alternative does not preclude a one-seat ride to JFK in the future. The service plan for 24 trains in the peak hour described in the DEIS is designed to meet the goals and objectives of the East Side Access Project and is based on ridership projections for 2020. The service plan will continue to be refined through the project development process.



**Comment 14:** The long-term ability to improve transportation from New Jersey and the west should be added as a goal of the East Side Access Project. I urge you to consider the feasibility of integrating the East Side Access Project into an overall plan such as is contemplated in ARC. (Salmon 2)

**Response:** As discussed on page 1-15 of the DEIS, East Side Access project goals were developed at the start of the planning process and refined during initial problem identification and public outreach. The East Side Access Project has been developed in coordination with ARC and the other projects included in the MTA Long Range Planning Framework.

**Comment 15:** NJ Transit has been working with MTA and PANYNJ on the ARC study. As the DEIS states, there has been coordination of these two projects, and others through MTA's Long Range Planning Framework. I am hopeful that this coordination will continue as the ESA project advances through the FEIS and engineering design phases, and it would be reassuring to see a statement to that effect included in the FEIS. (Warsh 1)

**Response:** The FEIS includes a statement to that effect in Chapter 1, "Project Purpose and Need."

**Comment 16:** Although a build alternative has not yet been selected for ARC, continued and active coordination with ARC is strongly recommended. Specifically, NJ Transit recommends that the ESA project allow for a commuter rail connection between New York Penn Station and Grand Central Terminal as identified in the early phases of the ARC. In addition, it would be desirable for ESA to incorporate features to ensure the minimum disruption to GCT when the connection is advanced. (Warsh 2)

**Response:** The East Side Access Project has coordinated with ARC throughout its planning and preliminary design and engineering phase and will continue to coordinate with ARC through final design and construction. Option 2 (the selected engineering option) preserves the possibility for alternatives developed under ARC to use GCT.

## PROJECT ALTERNATIVES

### *DESIGN ALTERNATIVES*

**Comment 17:** The DEIS is deficient because it has not presented reasonable alternatives for public evaluation. It is not reasonable for public agencies to simply say that they have thought about other alternatives but discarded them because the agencies did not think they met the project's goals. (Fruchtman 9)

**Response:** The East Side Access DEIS is the result of a planning process that has been underway for more than 30 years. In January of 1995, the process reached a point where project goals and objectives, along with project alternatives, were

developed as part of an MIS sponsored by the MTA and LIRR and carried out under the auspices of the FTA, the New York Metropolitan Transportation Council (NYMTC), and the MTA. At the start of the MIS process, public meetings on the scope of the analysis were held, at which the public was invited to comment on and present alternatives. Several of the “long list” alternatives in the MIS were developed as a result of the scoping process. The MIS considered a total of 21 separate “build” alternatives, as described in detail in the MIS. Appendix A of the DEIS provides an extensive summary of the “long list” of 21 alternatives considered, the methodology for screening these alternatives down to a “refined list” of alternatives, and the process by which the Preferred Alternative was chosen. As part of the long-list screening, alternatives were eliminated if they did not meet the project goals identified in the MIS—1) to relieve capacity constraints in Penn Station, and 2) to improve travel times to East Midtown Manhattan. The public was given the opportunity to comment on the findings of the MIS, including its selection of a Preferred Alternative, through dozens of public information meetings and a public hearing.

**Comment 18:** The alternatives presented are not sufficient to be considered a fair review of other practical alternatives, especially in light of the \$4.3 billion cost and the long period of construction and disruption involved. Other, less costly alternatives could accomplish the same goals as the Preferred Alternative. (Fruchtman 1; Haikalis 1; Landow 1, 2; Schumacher 4, 5, 6; Pearlstein 2)

**Response:** While the 21 alternatives considered in the MIS (see response to previous comment) and summarized in Appendix A of the DEIS included alternatives less costly than the one chosen as the Preferred Alternative, it was determined that these less costly alternatives would not have accomplished the goals and objectives set forth at the outset of the MIS.

**Comment 19:** Other alternatives should be included in the DEIS: 1) A new tunnel from the most westerly end of the present LIRR tracks in Queens directly into GCT that can carry bi-level trains; 2) An extension of the 42nd Street Shuttle train west and south to Penn Station and farther west to the Javits Center, and east to a new Second Avenue subway station, eliminating the need for an LIRR terminal at GCT; 3) Connect the LIRR to Lower Manhattan by extending service from the Atlantic Terminal in Brooklyn via subway lines; 4) Improve CBD hubs outside of Manhattan to direct new growth away from Manhattan’s CBD. (Fruchtman 7, 8; Schumacher 6)

The only hard alternative that has been studied has no capacity in the 63rd Street Tunnel for bi-level trains. (Fruchtman 3)

**Response:** As described above, the MIS analyzed a wide range of alternatives and identified the Preferred Alternative for analysis in the DEIS. Many of these were reevaluated in the DEIS process. The specific alternatives described above were not selected as the Preferred Alternative, for the following reasons:

1) The alternatives considered included a new tunnel to GCT, which is the Preferred Alternative. This alternative uses the existing 63rd Street Tunnel, which cannot currently accommodate bi-level trains. The Preferred Alternative allows 24 trains to reach Grand Central Terminal in the peak hour, which is adequate to meet long-term projected demand. The MIS also considered other alternatives, including a new tunnel beneath the East River (see Appendix A of the DEIS).

2) Extending the Shuttle train west and south to Penn Station and beyond would not meet the key goals and objectives of the East Side Access Project: it would not improve travel time to East Midtown Manhattan for LIRR commuters significantly, it would not relieve train traffic congestion into Penn Station or allow LIRR to increase its capacity into Manhattan during the peak period, and it would not provide a one-seat ride for LIRR commuters. Such an extension would only eliminate the need for some commuters to transfer from the uptown 1/2/3/9 train to the Shuttle train, saving a minority of commuters a small amount of travel time each day.

3) Alternatives that connect the LIRR to Lower Manhattan by extending service from the Atlantic Terminal via subway lines were evaluated in the MIS phase of the project (see alternatives 9C, 9D, 9E, and 9F). Such alternatives were deemed to be operationally and institutionally infeasible, and were not evaluated past the initial screening of long-list alternatives. This issue is also being addressed by MTA's Lower Manhattan Access study.

4) Policies related to the direction of growth and land use changes in New York City are within the purview of the City of New York, not MTA or FTA. While New York City is currently seeking to direct growth to areas outside of Manhattan's CBD, it is not anticipated that growth outside Manhattan will replace growth in Manhattan, as projected by metropolitan transportation planning agencies. Nonetheless, the LIRR station proposed at Sunnyside, Queens as part of the East Side Access Project would play an important role in supporting development of a new central business district in Long Island City, an area that the New York City Department of City Planning is actively seeking to create. The City's plans for the CBD in Long Island City are described in Chapter 3 of the EIS, "Land Use, Zoning, and Public Policy."

**Comment 20:** A LIRR station at 31st Street and Park Avenue would be less costly than the Preferred Alternative yet still achieve project goals of giving commuters direct access to East Midtown Manhattan. (Schumacher 4)

**Response:** The MIS considered two alternatives with new stations on the East Side along the route to Penn Station (see Appendix A, Alternatives 5 and 6). One of these alternatives was eliminated from consideration because it would aggravate congestion at Penn Station; the other was eliminated because of several factors that made it potentially operationally infeasible. These included the additional time added to each train's schedule because of the need to stop at the new station en route to Penn Station, the constraints to reverse peak service through the East River tunnels, and the limits to flexibility because of the

short distance between the new station and Penn Station. Moreover, as shown in Figure 9C-7 in the DEIS, the majority of LIRR passengers who travel to the East Side seek destinations north of 42nd Street.

**Comment 21:** There is an inadequate comparison and evaluation in the DEIS of the possibility of bringing both the LIRR Port Washington Branch and Main Lines through the 63rd Street Tunnel to the formerly proposed Third Avenue Terminal. (Epstein 9, Schumacher 5)

**Response:** MIS Alternative 4C (Third Avenue via the Main Line) considered this possibility as part of its in depth evaluation of the “refined list of project alternatives.” As summarized on pages A-16 to A-18 of Appendix A to the East Side Access DEIS, this alternative was determined to generate fewer daily riders, save less travel time, cost more, and have greater community and environmental impacts than the alternative chosen as the Preferred Alternative and evaluated in the DEIS (and FEIS).

**Comment 22:** Since a significant segment of the market has destinations in the East 50's, a combined LIRR/MNR station should be constructed in the area from 53rd to 57th Street, at which all trains en route to GCT would stop. (Landow 3)

**Response:** As described in Chapter 2 of the EIS, the Preferred Alternative would include exits from GCT as far north as 48th or 49th Street, allowing passengers to head north directly from the platform. Creating a new station in the East 50's would not be practicable, because it would be immediately adjacent to the platforms at GCT, which extend as far north as approximately 48th Street. Finally, MNR and LIRR tracks in this area would be completely separate, making a combined station very difficult.

**Comment 23:** A streamlined alternative, the “Apple Corridor,” proposed by the Committee for Better Transit (CBT), can accomplish LIRR access to GCT for \$1 billion rather than over \$3 billion. A benefit-cost analysis of Apple Corridor versus Option 2 of the Preferred Alternative should be conducted. (Haikalis 1, Pearlstein 2, Troy 1)

The region has far more transportation needs than the expected funding can support. Thus, it is critical that the “gold plating” be removed from this project and the link be built in the most “streamlined” cost-effective manner. To do this, additions and modifications should be considered and the marginal cost/benefit analysis be completed on each change or group of changes. (Dobrow 2)

**Response:** The Apple Corridor plan, published by the Committee for Better Transit in June 1996, was evaluated along with a number of other alternatives in the MIS phase of the East Side Access Project and again during the development of the DEIS. It was determined that the alternative eventually chosen as the Preferred Alternative was superior to the Apple Corridor plan in a number of

ways. A summary of that evaluation can be found on page A-22 of Appendix A to the DEIS. Subsequent refinements to the Preferred Alternative as reflected in the DEIS have been developed with consideration of costs and effectiveness.

In particular, the Apple Corridor plan does not meet the East Side Access Project's goals and objectives. The Apple Corridor plan is not capable of sustaining as high a level of service as East Side Access, and cannot meet the service requirements of its own ridership forecast (for more on this, please see the additional responses related to Apple Corridor, below). As also detailed below, the Apple Corridor would remove five active Metro-North tracks and three platforms from MNR service, restricting MNR's operations and cutting off MNR access to the upper-level loop track.

Perhaps most important, the estimated cost for the Apple Corridor plan is missing key components required to make it feasible. Key elements include the underpinning of buildings of Metro-North tunnels (as in Option 1 of the Preferred Alternative), changes to platforms at GCT, additional cross passages and exits at GCT, new LIRR vehicles, midday train storage yards, adequate connections at Harold, and real estate easements and acquisitions. The plan also underestimates the costs of systems and of finishes in GCT. Inclusion of these elements and adequate rolling stock would make the cost of the Harold to GCT segment of Apple Corridor comparable to East Side Access.

**Comment 24:** The Committee for Better Transit (CBT) plan, which would use the five westernmost upper-level platform tracks and the upper level loop track for LIRR 63rd Street Tunnel service, has only modest, if any, impacts on Metro-North operations. (Haikalis 2)

**Response:** The CBT scheme would remove five active Metro-North tracks and three platforms from MNR service, restricting MNR's operations and cutting off MNR access to the upper-level loop track. Additionally, construction of the CBT scheme would (like construction of Option 1 of the Preferred Alternative) require taking critical MNR tracks out of service for extended periods of time. Moreover, the Apple Corridor Plan would not provide any additional cross-passageways or exits in GCT to handle additional passengers.

**Comment 25:** The CBT plan provides capacity for LIRR operations at GCT equivalent to that of either option of the Preferred Alternative as outlined in the DEIS—24 trains allocated to the LIRR and 6 for direct Kennedy Airport service. (Haikalis 3)

**Response:** As outlined in its 1996 plan, Apple Corridor cannot provide the required level of service for LIRR customers provided by East Side Access. The CBT service goal at GCT is to aim for a capacity of 30 trains per hour. The ability to achieve such a service level within the Apple Corridor plan has not been demonstrated.

Apple Corridor's loop track at GCT is not suitable for operating the numbers of commuter rail trains in reverse service that would be required to achieve East Side Access service levels. Additionally, Apple Corridor's simplified track scheme at Harold Interlocking in Sunnyside would not allow reliable operation of peak-direction trains to and from GCT and Penn Station, which would limit the system's capacity. Furthermore, the new vehicles proposed by the plan would fit far fewer passengers than LIRR commuter trains (320 to 640 passengers per train, vs. 1,440 for a typical LIRR train). For these reasons, the Apple Corridor cannot provide the service required for the riders it predicts would use the new system.

**Comment 26:** The CBT plan provides a midday storage plan for LIRR railcars that would eliminate the need for the creation of a new storage yard in Queens. One plan would be to increase reverse-peak service and have trains lay up at the eastern ends of LIRR lines (as is done for NYCT subways and buses), thereby reducing costs. (Haikalis 4)

The project should evaluate a minimum approach of providing connection from the 63rd Street Tunnel to only two LIRR tracks at Sunnyside and providing no new storage facilities. (Dobrow 3)

**Response:** The LIRR Main Line to Jamaica consists of four tracks. Currently, it operates with three tracks in the peak direction and one track in the reverse peak direction. The peak service at GCT and Penn Station would utilize the entire capacity of the three peak-direction tracks, and the single reverse peak track would be able to sustain only about one-third as many trains as the three tracks. The balance of two-thirds of the trains must be provided with midday storage somewhere west of Harold Interlocking. Given that the LIRR's West Side Yard at Penn Station is already fully utilized, the requirement for East Side Access midday storage is absolute, barring an increase in the number of Main Line tracks, which has never been contemplated. The costs of such a proposal are inestimable. For these reasons, East Side Access must construct a midday storage yard in Queens, as well as dedicated leads from the 63rd Street Tunnel to that yard (requiring more than two tracks connecting the tunnel to the LIRR mainline). For further discussion of reverse peak service, see response to Comment 39 below.

**Comment 27:** More productive use of existing Penn Station tunnels can be accomplished in the near term, prior to the construction of East Side Access: "through operation" of trains from New Jersey to Long Island, construction of the Sunnyside Station prior to completion of East Side Access, coordinating other subway projects with East Side Access to relieve crowding on both Penn Station area subways and the Lexington Avenue line. (Haikalis 5)

**Response:** Regarding coordinating the East Side Access Project with other subway projects to relieve Lexington Avenue subway crowding, Chapter 9 of the DEIS discusses a number of measures to mitigate anticipated crowding. The

LIRR and NYCT continue to collaborate on means of improving subway service and connections in and around both Penn Station and GCT. Please see section 9C of the FEIS and response to Comment 92 below for details on the mitigation for subway crowding.

Regarding through operation of trains, the East Side Access Project does not preclude this concept, as discussed in the response to Comment 37. Through-running of NJ Transit and LIRR trains is being investigated by the PANYNJ as part of its ARC study.

Regarding construction of Sunnyside station prior to completion of East Side Access, see response to Comment 51 below.

**Comment 28:** I have submitted a number of reports noting the benefits of alterations to the design of the project and how it brings LIRR trains into GCT, including connections to the Biltmore Room, using the existing loop track, and simplifying the approach into GCT from Park Avenue. The plans described in these reports should be included in the DEIS as a third option of the Preferred Alternative. Specifically, my suggestions are as follows: 1) A direct connection between the LIRR platforms and the Biltmore Room should be incorporated into the Preferred Alternative, as detailed in my report, "LIRR Access to the GCT Arrival Station (Biltmore Room)," October 1999. 2) If the Grand Central loop track were to be used to its full capacity of 12 mph instead of 6 mph (as detailed in "More Than You Ever Wanted to Know About the Grand Central Loop Tracks" November 1999), this would eliminate the need for stub-ended tracks for the LIRR terminal, an interlocking north of the terminal, and grade-separated approaches to the terminal, all in Option 1 of the Preferred Alternative. (Landow 2)

**Response:** The two options of the Preferred Alternative were developed after careful consideration of many factors, including those that constrain MNR operations at GCT. The option referenced in this comment appears similar to Option 1, but would use MNR tracks J and A for LIRR access to GCT, among other differences. MNR has indicated that severe operational constraints would occur should track J be taken out of service for even a temporary time period to construct Option 1. Taking these tracks permanently for LIRR usage would create an unacceptable impact on MNR service. Moreover, MTA has selected Option 2 of the Preferred Alternative rather than Option 1, as it is superior particularly in terms of risks during construction. Since Option 1 would have to be constructed in close proximity to both Park Avenue building basements and existing Metro North tunnels, regardless of how the loop track is used, it would be more difficult to construct than Option 2.

It is anticipated that both options of the Preferred Alternative would include connection from the platforms to the Biltmore Room. Option 1 would connect the two westernmost LIRR platforms up into the Biltmore Room, similar to the plan suggested in the paper. Option 2 of the Preferred Alternative could likewise include a connection from the southern end of the LIRR concourse, up into the Biltmore Room. (Connections to the Biltmore Room are subject

to approval by the State Historic Preservation Office at the New York State Office of Parks, Recreation and Historic Preservation.)

**Comment 29:** To get East Side Access trains off the Main Line and onto the spur that leads to GCT, a flying junction is necessary. A slow, 20 or 30 mph, junction would be a waste of money. (Azumah 2)

**Response:** The East Side Access Project does not include a slow junction. A slow speed junction would adversely affect train schedules, and would also adversely affect the overall capacity of the Main Line by requiring Penn Station-bound trains to slow down behind GCT-bound trains. The project's design for the reconfigured Harold Interlocking incorporates #20 turnouts for all three East Side Access connections, which are suitable for diverging moves at 40 miles per hour. This is the maximum speed allowed by the curvature of the tracks in the tunnels to be built under Sunnyside Yard.

**Comment 30:** If you are going to build a separate terminal for the LIRR, make sure you have a connection from the Metro-North main tracks that come from the upstate regions down to the new LIRR terminal. (Azumah 6)

**Response:** A track connection between LIRR and MNR is not contemplated. Please note that the two systems use different types of third-rail shoes for power.

**Comment 31:** I would prefer Option 1 of the Preferred Alternative if and only if LIRR electric trains will have dual shoes (i.e., top-running and bottom-running third rail shoes). Since this is not practical, Option 2 should be chosen. (Hitch 1)

I prefer Option 2, because it would be less expensive and less disruptive. (Ausnit 1)

**Response:** As described in Chapter 2 of the EIS, Option 2 is the preferred engineering option for the Manhattan alignment and station.

**Comment 32:** Make sure the two outer tracks can be pointed in a direction to continue on to downtown Manhattan, as is currently being studied for the Lower Manhattan Access Project. (Azumah 7)

**Response:** All of the LIRR tracks at GCT under either option would point to the south.

**Comment 33:** Option 2 is potentially consistent with the goal of the ARC study while Option 1 is not. For this reason, Option 1 of the Preferred Alternative should be eliminated from consideration due to its higher cost and reduced transportation benefit to the region in the long run. (Salmon 1)



**Response:** The relative advantages of Option 2 over Option 1 are noted in the DEIS on pages S-10 and 2-11. As described there, Option 2 is the preferred engineering option for the Preferred Alternative.

**Comment 34:** Evaluate the feasibility of modifying the Preferred Alternative Option 2 in the future to extend the deep rock tunnels to the south and west, thereby converting the proposed terminal to a through-station. (Salmon 3)

**Response:** Option 2 of the Preferred Alternative protects the possibility for a future connection between Grand Central Terminal (GCT) and other points.

**Comment 35:** The DEIS did not analyze the TSM Alternative as rigorously as the No Build and the two Build options. For example, the DEIS discusses the possibility that a new Queens ferry pier may be needed to accommodate future riders from increased train service to Long Island City; however, it defers the analysis of that possibility by stating that environmental impacts of that action would be addressed in future permitting actions, should those take place. Also, the air quality section attempts to dismiss the necessity for modeling the TSM Alternative, claiming that it would not generate significant vehicular activity or affect traffic conditions significantly in the Manhattan study area. However, the TSM Alternative will affect transportation operations in both Manhattan and Queens, as well as other projects that are planned to be completed, such as the first phase of the MESA project, but those impacts to the transportation system are never fully considered in the DEIS. As such, claims of insignificant increases in bus volumes and traffic volumes may not be valid. We strongly recommend that the FEIS present a more comprehensive analysis of the environmental impacts of the TSM Alternative. (Hargrove 3)

**Response:** The Council on Environmental Quality's regulations (40 CFR Part 1500) implementing the National Environmental Policy Act (NEPA) require that EISs "should present the environmental impacts of the proposal and the alternatives in comparative form, thus sharply defining the issues and providing a clear basis for choice among options by the decisionmaker and the public" (40 CFR 1502.14). In addition to the Preferred Alternative, the DEIS prepared for the East Side Access Project includes two other alternatives for comparison to the project: the No Action Alternative and the Transportation Systems Management (TSM) Alternative. Both are provided to allow decisionmakers and the public to understand the benefits and impacts of the Preferred Alternative in the context of what would happen without the project, and what would happen with a smaller investment in transportation improvements.

As described in the DEIS, the purpose of the TSM Alternative for East Side Access is to increase capacity (and, consequently, ridership) for commuters traveling from Long Island to the East Side of Manhattan without a major investment of funds. Consequently, the TSM Alternative presented in the DEIS consists primarily of changes to service provided on the LIRR (e.g., longer trains, increased frequency, better connections to the subway and ferry), and

would not involve major construction. The detailed ridership analysis conducted for the project included projections of riders for the No Action, TSM, and Preferred Alternatives, and demonstrates that the TSM Alternative cannot meet the goals of the project: it would not substantially increase the number of riders on the LIRR or significantly change the numbers of people traveling to the East Side of Manhattan via the LIRR. Overall, the TSM Alternative would have only a slight reduction in the number of vehicle trips to Manhattan from the No Action Alternative.

For these reasons, the analysis of the TSM Alternative in the DEIS is appropriate. Overall, the TSM Alternative would not differ greatly in its effects—whether benefits or adverse effects—from the No Action Alternative. Each chapter of the DEIS includes a discussion of the TSM Alternative that explains how it differs from the No Action Alternative, if at all. Where relevant, these analyses are provided in detail (for example, detailed discussions of the visual and aesthetic considerations, historic resources, and archaeological resources are provided for the TSM Alternative), and where meaningful, they are quantified in the DEIS. Specifically, the ridership forecasts provided in Appendix C and summarized in Chapter 9 provide conclusions for the No Action, TSM, and Preferred Alternatives. The effect of the service changes included in the TSM Alternative would be to shift some LIRR riders who would otherwise arrive at Penn Station to the LIRR terminals at Hunterspoint Avenue and Long Island City in Queens, and Flatbush Avenue in Brooklyn (see Table 9B-2 on page 9B-5 in the DEIS). Most of these new riders would transfer to the subways near those terminal stations, although some would also transfer to the ferry. The analysis in Chapter 9, section D describes the effects of the new riders in the TSM Alternative on the No. 7 subway line. Table 9B-4 has been revised in the FEIS to list the riders generated by the TSM Alternative as well as the No Action and Preferred Alternatives.

With respect to the pier cited in the comment, please note that, given the ridership projections for the TSM Alternative, a new pier at the Queens ferry terminal may not be necessary. Nonetheless, the DEIS does indicate the potential for an impact on water quality from the TSM Alternative and cites the need for permits from appropriate agencies. The permitting process is intended to reduce or eliminate adverse impacts on water quality. With respect to air quality, the DEIS indicates that the TSM Alternative would not change traffic conditions in Manhattan or on Long Island in comparison with the No Action condition. This statement is correct and supported by the ridership forecasts and traffic analyses presented in Chapter 9. Without a change in vehicular trips, air quality also would not change compared with the No Action Alternative. Regardless of the other transportation projects planned for the region, the TSM Alternative still would not increase vehicular trips to Manhattan and therefore would not affect microscale air quality.

*OPERATIONAL ASPECTS*

**Comment 36:** There is no storage capacity at Grand Central so you have to bring the trains back through those tunnels, which will reduce capacity. (Fruchtman 4)

We have a lot of storage concerns: where will you put the extra trains? (Azumah 4)

**Response:** As described in Chapter 2, “Project Alternatives,” East Side Access trains would be stored during the midday period in a new storage yard adjacent to Sunnyside Yard in Queens. With this design, the project would bring 24 trains to GCT during the peak hour, which would meet long-term demand.

**Comment 37:** Together with any East Side Access plan should be through-running of NJ Transit and LIRR trains through Penn Station. At present, both LIRR and NJ Transit must both reverse direction at Penn Station, yet the station is designed for through operation. This would benefit passengers who desire to travel between points in New Jersey and Long Island. There would be no additional cost. In fact, there would be cost savings in the number of trains required as well as in reduced crews. Limited new catenary could be strung to serve NJ Transit cars (Schumacher 7, Azumah 3)

Any rail project in the region should be designed consistent with the goal of converting the existing discrete commuter rail lines into an integrated regional rail system with through-running and pattern operations. (Dobrow 6)

**Response:** NJ Transit currently runs through Penn Station and the East River Tunnels to Sunnyside Yard in Queens, where it stores trains during the midday. The Preferred Alternative strives to integrate regional commuter rail lines in a number of ways: 1) by introducing LIRR service into GCT, allowing for easy transfers to and from MNR service; 2) by constructing a Sunnyside station that could be used by regional commuter rail providers such as the LIRR, Amtrak, and NJ Transit; 3) by reducing train traffic congestion at Penn Station, potentially allowing MNR to introduce service to West Midtown Manhattan; 4) by designing a LIRR terminal at GCT that could potentially be extended south, to Lower Manhattan, or south and west, to Penn Station.

Through-running of NJ Transit and LIRR trains is being investigated by PANYNJ as part of its ARC study.

**Comment 38:** Although the project doesn’t suggest additional service to stations on LIRR lines such as the Port Washington Branch and the Atlantic Branch in Queens, the project should look at the possibility of more service on these branches. (Olmstead 1)

**Response:** As described in the DEIS in Chapter 2 (see page 2-25), it is anticipated that three to six trains would be added during the peak hour on the Port Washington Branch as well as the Babylon and Ronkonkoma Branches, and two trains

would be added during the peak hour on the Long Beach, Far Rockaway, and Hempstead Branches.

**Comment 39:** It would be helpful to know more about the future of reverse-peak service; this is not explained thoroughly. A full description of expected LIRR service to Penn Station and GCT after completion of East Side Access should be in the body of the final EIS. (Schank 13)

**Response:** The DEIS discusses operational aspects of the project in Chapter 2, "Project Alternatives," on page 2-25, and presents a service plan for LIRR service to Penn Station and GCT on page 9B-3 and 9B-4, as well as in Appendix C, "Ridership Forecasting Results Report." As noted in the DEIS on page 2-25, "Reverse commute service on most branches throughout the LIRR system would more than double as compared to the No Action Alternative. To accommodate GCT service, the Preferred Alternative would increase peak hour reverse commute service from 11 trains under the No Action Alternative to 24 trains, with 12 trains operating from Penn Station and 12 trains operating from GCT. Service to Main Line destinations, Ronkonkoma, and Huntington stations would be provided at 20-minute intervals from Manhattan during peak periods (currently, reverse peak trains run approximately hourly)." This information has been added to the discussion of the operating plan provided in Chapter 9, section B, in the FEIS (see pages 9B-4 and 9B-5). A detailed operating plan for LIRR East Side Access service (which will include details of reverse-peak service and full-day scheduling), is being developed as preliminary engineering advances, based on the service planning levels indicated in the EIS.

#### *NEW TERMINAL AT GCT*

**Comment 40:** The project should be evaluated starting with minimum new construction at GCT. (Dobrow 5)

**Response:** Throughout the evolution of the Preferred Alternative, from its articulation in the MIS, to its preliminary design as shown in the DEIS, the project team has strived for efficiency in design and construction, in GCT and at all other project sites. The Preferred Alternative represents the minimum new construction at GCT required to serve the projected demand in 2020.

**Comment 41:** The proposed LIRR terminal under GCT in Option 2 of the Preferred Alternative is too deep. At 125 feet below the surface, it would require an escalator ride the equivalent of 12 stories up, greater than for any other transit project in existence. (Adler 1, Schumacher 1)

**Response:** The preliminary design of Option 2 of the Preferred Alternative takes into account a number of factors vital to the successful engineering and operation of East Side Access service into GCT. Three factors had to be accounted for in

designing the approach to and from the terminal at GCT: 1) the constructability of the tunnels and station without unreasonable risk, 2) the need to minimize operational impacts to Metro-North and its customers, and 3) the need to transport passengers safely and effectively.

Please note that since publication of the DEIS, the design of the station to be developed under Option 2 has been revised, and to ensure that the terminal station and approach tunnels are both constructable and operationally feasible, the depth of the LIRR terminal at GCT may continue to be revised during final design and preliminary engineering. Currently, two design concepts are being considered for the Option 2 terminal, both of which would require fewer tracks and one less platform than presented in the DEIS. Under either concept, a new passenger concourse would occupy the westernmost track area of GCT's lower level—the area that would be used for LIRR's new tracks and platforms under Option 1. New LIRR tracks and platforms would be located beneath the concourse area. The two design options being considered vary in the layout of the tracks and platforms under Option 2: one concept would have eight tracks served by four platforms on one new lower level, approximately 90 feet below the new concourse and existing lower level at GCT, while the other concept would have eight tracks served by four platforms on two new levels, approximately 90 feet and 110 feet below the concourse level. Under either concept, passengers would travel to street level on several different sets of escalators, not on a single escalator as suggested by the comment. Passengers would travel on one of many escalators from the platform level to a mezzanine level, then on a different escalator from the mezzanine level to the concourse in the existing lower level of Grand Central Terminal. From the concourse, they could ascend to a street exit or into Grand Central.

Regardless of the depth of the tunnels and terminal at GCT, all areas would be designed to be safe—in accordance with NFPA 130 fire regulations, as described in the "Safety and Security" section below—and to minimize travel times up to the LIRR concourse and the street. The station would be developed following modern safety standards, and would have multiple banks of high-speed escalators to bring passengers to the surface. Overall, the new station design would be state-of-the-art, with safety features more advanced than those in existing stations in the region.

The LIRR terminal at GCT would not be the deepest transit station in existence (for example, Washington State Park station in Portland, Oregon is approximately 280 feet underground and Hampstead Heath station on the Northern Line in London is approximately 200 feet deep). In fact, transit stations greater than 100 feet underground are not uncommon, as shown in Table 28-1.

Table 28-1  
Selected Deep Transit Stations

Station	Location	Approximate Depth from Street to Platform (feet)
Lexington Ave/63rd St, B/Q Line	New York, NY	140
190th St, A Line	New York, NY	210
Weehawken Station, Hudson-Bergen Line	Weehawken, NJ	160
Washington State Park	Portland, OR	280
Wheaton	Washington, DC	115
Bethesda	Washington, DC	120
Medical Center	Washington, DC	122
Dupont Circle	Washington, DC	105
Hampstead Heath, Northern Line	London, UK	200
Hausmann/St. Lazarre, Line E	Paris, France	110
Avenida de America, Line 9	Madrid, Spain	145
Cuatro Caminos, Line 6	Madrid, Spain	160
Moto-Asakusa	Tokyo, Japan	115
Roppongi	Tokyo, Japan	130
Shinjuku	Tokyo, Japan	115
Ochimachi	Tokyo, Japan	125
Korakuen, Nan-Boku Line	Tokyo, Japan	125

**Comment 42:** The new LIRR station in GCT should be fully ADA accessible, with connections between the LIRR, MNR, and all subway lines in the area created or improved. Direct ramp or elevator transfers should be created between the LIRR and MNR, and the Lexington Avenue and No. 7 subways. (Aryel 3)

**Response:** The new LIRR station in GCT would be fully ADA accessible and provide connections between the LIRR, MNR, and the Main Concourse of GCT. All platforms of the new terminal would be served by elevators connecting to the Main Concourse. Creating ADA access to the subway stations at GCT would require reconfiguring those stations, which is outside the scope and control of the East Side Access Project. All subway platforms at GCT, with the exception of the No. 7 platform, are ADA accessible. Construction of a new elevator to this new platform is currently under way, so that the No. 7 platform will be ADA accessible as well before the East Side Access Project opens.

**Comment 43:** Signs with good contrast and large letters should replace existing signage in the Main Concourse, and be included as part of the new LIRR facilities. (Aryel 4)

**Response:** All signs in the new LIRR facilities would be designed to maximize readability. While some signs would be added to existing areas of GCT, there are no plans to replace existing signs in the historic Main Concourse with new signs.

*VENTILATION PLANT AT 47 EAST 44TH STREET*

**Comment 44:** The ventilation facility proposed for construction at 47 East 44th Street could be constructed on property owned by the MTA, eliminating the need to take privately owned property. The facility could be constructed in the current location of either a 1-story extension in the rear of 347 Madison, or a 3-story extension on the south side of 45th Street, at the eastern property line of 347 Madison Avenue. (Epstein 1)

**Response:** During the Major Investment Study it was recognized that in locating the planned LIRR terminal station within the western segment of the lower level of GCT a source of outside air must be introduced. The current ventilation system in place for MNR depends on existing easements through various air rights buildings that are above GCT as its source of outdoor air.

Two possibilities were explored between 43rd Street and 48th Street: a surface location and an underground system in the bed of a street. The underground system was not viable because of either the lack of sidewalk surface area for ventilation gratings or the encumbrance of such space by below-grade construction, such as the MNR facilities beneath 46th and 47th Streets. Further restricting the use of an underground location was the need to accommodate off-street entrances, which would use the bed of the street to connect the lower level of GCT to an entrance within an above-ground building.

The surface-site alternative required a location adjacent to the west wall of the GCT trainshed, which is approximately midblock between Vanderbilt and Madison Avenues. The air ducts necessary to move the air, some 300 square feet in cross section, could not be located directly above the planned LIRR terminal area, as this space is occupied by MNR operating tracks and passenger platforms. Each of the blocks between 43rd Street and 48th Street is occupied solely by high-rise buildings except for Block 1279, between 44th and 45th Street. The two properties abutting the west wall of GCT on this block are 47 East 44th Street and 347 Madison Avenue, which is owned by the MTA.

A portion of the 347 Madison Avenue site is planned to be used for an off-street entrance, which would require extensive reconfiguration of the building utility supply systems located in the cellar areas along the building's 45th Street frontage. This extensive reconstruction of the building's utility supply systems would also require the use of the cellar area at the building's eastern property line (under a 3-story portion of the building), precluding its use as a ventilation facility. Furthermore, the structural building columns in the narrow 3-story portion of 347 Madison Avenue, as well as the adjacent freight elevator that services the building and its cellars, prevent this space from

being converted for use as a ventilation facility. The 1-story courtyard space just south of this narrow 3-story portion of 347 Madison Avenue could not be used for the ventilation facility due to its interior location: construction access would have to be through the aforementioned 3-story portion of 347 Madison on the south side of 45th Street, which is not feasible for the reasons mentioned above. Furthermore, blocking this courtyard would block light and air to adjacent building facades.

**Comment 45:** Specifics regarding the proposed ventilation and/or HVAC plant proposed for 47 East 44th Street are inadequate, which leaves in doubt the actual intentions of the MTA in connection with the proposed condemnation of this building. The DEIS states (on pages 6-22 and 6-23) only that the MTA and its subsidiaries are not subject to New York City zoning requirements. (Epstein 3)

**Response:** The DEIS includes a discussion of the ventilation plant required at 47 East 44th Street in Chapter 2, "Project Alternatives" (pages 2-21 and 2-22) and Chapter 5, "Economic Conditions" (page 5-25). As described in the DEIS (see page 6-22), the new facility would occupy the same width and depth as the 5-story building now on the site, but would be of a greater (though at this time undetermined) height than the structure it would be replacing. The design for the new vent building is still under way. The DEIS also says that "Although MTA and its subsidiaries are not subject to New York City zoning requirements, the design of the building would be coordinated with appropriate city agencies. The owners of adjacent buildings, including the Yale Club, would be provided with preliminary engineering design and artist renderings of the building, as they become available." The fact that the design of the vent plant is not yet finalized does not in any way cast doubt on the need for a ventilation facility at 47 East 44th Street to provide fresh air for the new station to be developed for East Side Access.

**Comment 46:** The proposed ventilation facility would not need occupy the entire 25' x 100' plot at 47 East 44th Street. The need for less space is certainly evident under Option 1. (Epstein 4)

**Response:** Vent shafts, access shafts, and ventilation equipment would occupy the entire 25' x 100' plot at 47 East 44th Street under either option of the Preferred Alternative.

**Comment 47:** The proposed ventilation facility at 47 East 44th Street would appear to vent into the existing louver vents at the rear of 345 Madison Avenue (owned by the MTA), adversely affecting the MTA itself. (Epstein 5)

**Response:** Any exhaust that would vent from the roof or front of the proposed ventilation facility at 47 East 44th Street would be ducted away from operable windows or intake vents on adjacent buildings.



*SUNNYSIDE STATION*

**Comment 48:** Think carefully about the design of the Sunnyside station. Make sure passengers originating in diesel territory have a viable way of getting to the city. Provide an easy and practical transfer without steps (as shown in the drawings with escalators). (Troy 2)

**Response:** Current plans call for passengers in diesel territory destined for GCT to transfer trains at Jamaica station rather than Sunnyside station (which would serve only Penn-Station-bound trains). To the extent practicable, the transfer at Jamaica would be an across-the-platform transfer from the diesel or dual-mode coach to the GCT-bound train. This would be consistent with current transfer practices at Jamaica station.

**Comment 49:** A better connection between the proposed Sunnyside station and other transit and Queens Plaza is necessary. (Nolan 4)

**Response:** The proposed Sunnyside station would be developed at the junction of the LIRR Main Line/Port Washington Branch tracks and the Queens Boulevard bridge. For this station to be useful to most LIRR customers, it must be located along these Main Line tracks leading to and from Penn Station, so that adequate service can be provided to the station. From the Sunnyside station, passengers would be able to walk a short distance (along the Queens Boulevard bridge) to the E, F, G, and R subway lines. Since the north-south location of the station cannot be altered (it must be sited along the existing Main Line/Port Washington Branch tracks), the station's east-west location is proposed for an area directly under the Queens Boulevard bridge to allow for the most direct connection to Queens Plaza subway stations. As described in the DEIS, this bridge is scheduled to be reconstructed in the near future to provide wider sidewalks as well as a new bikeway.

In addition, the MTA has allocated \$2 million in its current Capital Program to study improvements to pedestrian connections between the new Sunnyside station and other transit stations in Long Island City.

**Comment 50:** The new station in Sunnyside, Queens, designed to buttress the burgeoning growth of the Long Island City CBD, will result in more pedestrian activity. This may necessitate the addition of open space to accommodate the needs of the increasing number of workers and residents in the area. This could be achieved by creating a public plaza with concession stands and landscaped with trees and benches. (Laird 1)

**Response:** The city's Department of City Planning (DCP) is proposing to rezone an area of Long Island City in the vicinity of Queens Plaza to permit development of the scale and type that would create a new Central Business District (CBD) in New York. The zoning changes proposed, which would create the Special Long Island City Mixed Use District, would require new developments on blocks in the vicinity of Queens Plaza to provide new public open spaces. The

design requirements for such open spaces include seating, lighting, and planting and tree requirements. A discussion of these open space provisions for new developments allowed by the rezoning have been added to the FEIS in Chapter 4, "Social Conditions."

**Comment 51:** The DEIS should explain why the Sunnyside station must be tied to East Side Access. It is not clear from reading the DEIS exactly why the station could not be built independently or as part of the TSM Alternative. (Schank 12)

**Response:** Due to capacity constraints to train service in the area of Harold Interlocking (in the Sunnyside Yard vicinity), a new Sunnyside station would not be operationally feasible without the improvements proposed as part of East Side Access. To add Sunnyside station as a stop for LIRR trains en route to Penn Station, some trains moving through Harold Interlocking would have to be re-routed to new, GCT-bound tracks planned under the East Side Access Project. Without East Side Access, stopping trains at Sunnyside station would create an unacceptable logjam of trains at Harold Interlocking.

**Comment 52:** A streamlined project should be evaluated without the frills, starting with no Long Island City station. (Dobrow 4)

**Response:** The construction of a LIRR station in Sunnyside, Queens would improve the ability of both the LIRR and potentially Amtrak and NJ Transit, to serve the planned fourth New York City CBD in Long Island City, Queens (as discussed on page 3-36 of the DEIS). By relieving train traffic congestion in the vicinity of Harold Interlocking, East Side Access would permit the construction of such a station, which could not be constructed without East Side Access.

#### *PROJECT COSTS*

**Comment 53:** Throughout the DEIS, assumptions regarding Amtrak's payment of East Side Access Project-generated expenses are in error. These costs should be added to the East Side Access Project costs noted in the DEIS section on Commitment of Resources and elsewhere; otherwise, it cannot be assumed that the underlying improvements will be built, and the resultant impacts must be disclosed. Tables 2-3 and 22-7 include a statement that certain improvements benefit Amtrak operations and declares that improvements "would be funded by the agencies that most directly benefit from the improvements, and not as part of the total East Side Access capital costs." The DEIS assumes that Amtrak will pay for a fourth loop track, the westbound bypass, and permanent location of Buildings 2, 3, and 4 in Sunnyside Yard. These features provide no benefit to Amtrak, and even if they did, there are no plans or money in its budget to pay for them. (Ernst 1B)

**Response:** The note in Tables 2-3 and 22-7 of the DEIS is incorrect: East Side Access Project costs do include the westbound bypass at Harold Interlocking and the additional loop track and its associated tunnel and retaining wall. The tables are corrected in the FEIS (see Chapters 2 and 22). Further, as a result of changes to the construction plan for East Side Access in Queens, described earlier, demolition or use of Buildings 2, 3, and 4 in Sunnyside Yard is not required. To the extent that there may be legitimate costs for project elements that benefit Amtrak, these will be the subject of future discussions between Amtrak and MTA/LIRR.

#### *OTHER COMMENTS*

**Comment 54:** If MTA chooses the option which requires underpinning of private buildings, that work must be filed with and approved by the Buildings Department, along with any other modifications to these buildings. (Visconti 1)

**Response:** MTA has selected Option 2, which does not require underpinning of private buildings. This option was selected specifically to avoid the difficult construction and risk associated with the underpinning of buildings and tunnels required by Option 1.

#### **LONG ISLAND STORAGE YARDS**

**Comment 55:** The public has not had an adequate opportunity to comment on the DEIS with respect to the Long Island storage yard sites. You should re-open the comment period to allow time for the Planning Department of the Town of Huntington and residents who would be affected by the new yard to voice their concerns. As a public agency, you should notify and gather input from the involved community before taking action. Inadequate outreach efforts were made and insufficient notices were provided over MTA's proposed yard in Greenlawn. While there were many informational meetings listed for the New York City area, only a single meeting was held in Suffolk County to discuss environmental issues and studies. A public hearing should have been held on Long Island. I invite you to send a representative to hear the comments made at the public meeting being held on August 15, and I urge you to include these comments as part of the DEIS process. (Cuthbertson 1, Gaye 2)

**Response:** The text throughout the FEIS has been clarified with respect to the yard sites. The DEIS for the East Side Access Project included an analysis of eight potential rail storage yards in Nassau and Suffolk Counties, based on sites identified through a preliminary screening process conducted by the LIRR (see page 2-34 of the DEIS). That discussion is no longer applicable. Since that time, the LIRR has continued to explore the possible alternatives for developing new yard space and, based on community input, has determined that it will initiate a new site selection process for any new yards to be developed. The process of identifying potentially appropriate sites for the new yards and selecting preferred alternatives for those sites will be

conducted in the future by the LIRR. Planning for the storage yards is currently at a very early stage. At present, no site on any LIRR branch has the status of a preferred yard location.

The decision whether to go forward with one or more additional storage yards, where the yard or yards should be located, and the details concerning expansion of the existing yards will be the subject of a tiered environmental review. Under a tiered NEPA EIS approach, the lead agency focuses on the issues that are ripe for decision in the first-tier document and prepares further environmental analyses as elements of the subsequent actions become adequately defined.

The steps that will be followed in the storage yard development process, to be conducted through a comprehensive public outreach process, are as follows:

1. Develop site selection evaluation criteria
2. Identify a list of potential sites
3. Perform screening analyses
4. Identify potential environmental impacts
5. Develop mitigation measures.

As the new storage yards would not be developed for a number of years, the public outreach and environmental review process for these yards has not yet begun. Therefore, at this time, it is not possible to identify the specific locations of new yards to be developed to meet the LIRR's future needs.

Because the increased need for storage yards is one of the foreseeable environmental impacts of the East Side Access Project, this FEIS includes an analysis of that impact. The FEIS identifies seven sites in Nassau and Suffolk Counties to illustrate the types of impacts that could occur with development of new yard facilities on Long Island. As noted above, this is a change from the DEIS, which described those seven sites as part of the site selection process for new LIRR storage yards. It should also be noted that an eighth site, at Hazeltine in the Town of Huntington, Suffolk County, was also described in the DEIS but is not included in this FEIS. This site has been eliminated because the DEIS identified significant adverse impacts associated with the site's proximity to residential neighborhoods and because of community input received during the public comment period for the East Side Access Project's DEIS.

Please note that all comments received through December 1, 2000 were included in this chapter.

**Comment 56:** The DEIS states that the proposed Greenlawn facility would be potentially incompatible with residential neighborhoods to the north and south and with the Town of Huntington's Comprehensive Plan and zoning for the site. Given this fact and that you have listed the Greenlawn rail yard as your number one preferred location for such a facility, I request that you re-open your site selection process and seek locations that are suitable for such an intense use. (Cuthbertson 2)

**Response:** See the response to Comment 55.

**Comment 57:** The DEIS identifies the Greenlawn site as the preferred location for a new rail yard on the Port Jefferson Branch, but this site would disrupt and adversely affect nearby residential communities because it would be inconsistent with the character of the quiet residential communities to the north and south and because it would be very active and well lit at night. Therefore, the Suffolk County Legislature hereby request the MTA to reject the Hazeltine site in Greenlawn, Suffolk County as a site for a new rail storage yard and cleaning facility. (Barton 1)

**Response:** See the response to Comment 55.

**Comment 58:** The DEIS fails to describe in any detail the operating advantages of the yard in Greenlawn. Further, the DEIS states that the alternative site—Cerro Wire in Hicksville—is not at all desirable from an operating point of view. I do not believe this, since that site is very close to the junction at Hicksville and would easily serve not only the Port Jefferson Branch but also the Ronkonkoma Branch. Given its much larger area, the absence of nearby housing, and its present industrial zoning in use, in the absence of extremely compelling operating reasons, I think Cerro Wire should be the preferred site. If a tradeoff is to be made between additional housing and another shopping mall, I think most people would favor housing. (Ramage 5)

**Response:** Please see the response to Comment 55 for information on selection of storage yard sites.

**Comment 59:** The MTA has given much more weight to its engineering and operational considerations than it has to the environmental concerns in selecting Hazeltine over Cerro Wire as the preferred site location. Evidently, Cerro Wire was not selected because the DEIS reports the presence of contaminated materials that would need to be mitigated and shopping mall proposal for that site. The DEIS indicates that the proposed yard would not be a significant impact to the Cerro Wire site on page 3-39, but notes that significant impacts would occur at the Hazeltine site. (Gaye 3)

**Response:** See the response to Comment 55.

**Comment 60:** The DEIS fails to consider all reasonable alternatives for the Port Jefferson Branch yard. The DEIS reports on only two alternatives for this yard. However, there is a large undeveloped parcel west of Oakwood Road and south of Rogue's Path in Huntington adjacent to the north side of the LIRR tracks. This 209-acre parcel was formerly known as Froelich Farms, was acquired by the County in the mid-1990's as a result of pressure from local citizens to keep the land undeveloped, and is now called Froelich Farms County Park.

This site, which is large, flat, and not close to existing housing, is ideal for a yard. Further, it would be large enough to accommodate a parking lot to meet future parking needs at Huntington station. Although LIRR's purchase of this land from Suffolk County might require an act of the State Legislature, the site's attributes seem so strong that it should be considered thoroughly. This would allow the Greenlawn and Cerro Wire sites to be developed by their owners for their intended uses. (Ramage 6)

**Response:** See the response to Comment 55.

**Comment 61:** With regard to the planned physical facilities for the Hazeltine Yard, you should take into account that there is only a single track running east of Park Avenue toward the site. It is hard to see how the proposed yard would operate without an additional track. The right-of-way is very narrow and it would appear that additional right-of-way would have to be acquired if a second track were built. Installing a second track would also likely mean relocate the power lines that run along the track. These changes and their impact are not considered in the DEIS. Also, the DEIS states that the space needed between tracks is 25 feet on centers. With 16 tracks planned under the Preferred Alternative, plus an additional 25 feet on either side, a minimum width for the yard is likely to be 450 feet (18 x 25'). The land parcel is most likely not wide enough to accommodate your preferred alternative. If the LIRR built an eight-track yard here and an eight-track yard in Hicksville, it would harm two locations and probably result in some duplication of facilities. (Ramage 3)

**Response:** Please see the response to Comment 55.

**Comment 62:** We are greatly concerned over the possibility of selection of the residentially zoned Hazeltine site for a new nighttime storage yard for the LIRR. If permitted, the excessive noise associated with a railroad yard will cause havoc with my family's life. The operation of the yard will interfere with sleep, telephone calls, and young children playing outside, and will change the suburban area into a city-sounding urban center. One of the several parcels already zoned for commercial and industrial use along the train tracks between Port Jefferson and Manhattan should be used for the new railroad yard. (Greenlawn/Huntington 1, Gary 1, Gaye 1)

**Response:** Please see the response to Comment 55.

**Comment 63:** The proposed Hazeltine Yard will have a very adverse impact on the Greenlawn community. In addition to the noise, vibration, lighting, and other harmful effects noted in your report, you fail to note that the community will lose 57 units of moderate-income housing planned for development. The DEIS notes correctly that this development is up for a zoning modification in late September 2000, but fails to recognize that various community groups have been working with the developer for more than five years to develop the land

in a fashion that meets community needs. Under the developer's plan, additional housing, sorely needed in the community, will be built and 5 acres will be dedicated for playing fields and other public activities. Our Little League and community soccer fields need these additional playing fields. The DEIS fails to note any possible economic gains from the planned residential housing on the Hazeltine site, even though it mentions the positive economic gains for the Cerro wire site based on possible mall development. (Ramage 1, Gaye 4)

**Response:** As noted in the comment, the DEIS describes the potential adverse impacts of a new storage yard at the Hazeltine site. Please see the response to Comment 55.

**Comment 64:** The analysis of the Greenlawn community in the DEIS makes it seem like an upper middle class "white enclave." Nothing could be further from the truth. I think your statistics on community composition are out of date. For example, in the 3,100-student Harborfields School System, more than 30 languages are taught in the English as a Second Language Program. We have built a mixed racial and cultural community over the years and this should be recognized in your study. (Ramage 2)

**Response:** As described in the DEIS in Chapter 4, "Social Conditions," for purposes of analyzing the potential impacts of proposed new yards, the EIS chapters consider a 400-foot study area around the potential nighttime storage yard sites. This is the area where the potential for impacts associated with the proposed yard would be greatest. The population information provided in the DEIS for the Hazeltine site was the latest census data available—from 1990—from the census tracts that are located within that 400-foot area. Please also see the response to Comment 55.

**Comment 65:** The DEIS analysis of the impact of the Hazeltine Yard on abutting properties is incomplete, as it does not include any consideration of the potential adverse impact on BAE Systems to the east. This company employs over 600 people at its Greenlawn location and engages in activities that would be severely adversely impacted by vibration and large masses of metal from the tracks and trains. They engage in precision machining of microwave systems as well as field studies of antenna patterns related to the transmission of signals, and much of their work is highly classified for the U.S. government and the defense industry. If their activities were compromised by the new yard, the community and the state could lose these high technology jobs and it is even possible that all BAE Systems activities on Long Island might be curtailed or shifted elsewhere in the U.S. (Ramage 4)

**Response:** Please see the response to Comment 55.

**Comment 66:** Numerous issues related to environmental impacts of a new yard at Hazeltine were not addressed in the DEIS. These include the potential presence of springs and aquifers, an assessment of the yard's water demand and its effect on local water authority systems; chemicals used at the yard that might be present in wastewater; the need for treatment of wastewater; the noise from the trains at the yard on adjacent residences; the visual and social impacts of fencing and lighting; the effects of sewage removed from the trains (the report describes 16 1,600-foot-long sewage tanks for storage of sewage, but does not estimate the volumes of waste, frequency of pumping, and where wastes would be treated); effects on peak-hour traffic from train traffic at the at-grade crossing leading to the yard; and characteristics of new employees at the yard (would they be hired locally, and what would their wages be, as well as what traffic effects would result from new employees driving to the yard). (Gaye 5)

**Response:** The DEIS includes a generic assessment of a full range of relevant issues for a new yard at Hazeltine, included those cited in the comment. See Chapter 15, "Natural Resources," for a discussion of natural resources (including water resources, chemicals used during cleaning, and discharge of sanitary sewage to the local sewer system, not to 1,600-foot-long storage tanks) and Chapter 9E for a discussion of traffic impacts. Please also see the response to Comment 55.

**Comment 67:** NYSDEC was not involved in the review of any investigation work plans for any new off-peak storage yards that are proposed to be built at Cerro Wire, Hazeltine, Babylon, Yaphank West and East, Ronkonkoma, Pilgrim Hospital, and Riverhead sites. (de Quillfeldt 5)

**Response:** Subsurface investigations to assess potential soil and/or groundwater contamination at the nighttime storage yards on Long Island were not conducted as part of the East Side Access Project. The future development of these facilities would undergo a separate environmental review, which would include an assessment of the potential impacts associated with any soil or groundwater contamination. See the response to Comment 55.

**Comment 68:** The DEIS states that The Taubman Company's proposal to build an upscale shopping mall, known as The Mall at Oyster Bay, on the Cerro Wire site "is currently undergoing environmental review by the Town of Oyster Bay." In fact, on June 13, 2000 the Town Board of Oyster Bay unanimously passed a resolution accepting as complete the Final Environmental Impact Statement for The Mall at Oyster Bay, dated May 2000, which was prepared pursuant to the New York State Environmental Quality Review Act. That FEIS thoroughly analyzed the environmental aspects of the Cerro Wire site and The Mall at Oyster Bay project, which, as revised, will include 860,000 square feet of building area and two anchor stores—not 960,000 square feet and three anchor stores as stated in the East Side Access DEIS. (Archer 1)



**Response:** The discussions of The Mall at Oyster Bay project in the FEIS have been corrected to note the completion of that project's FEIS and the revisions to the project.

**Comment 69:** The East Side Access DEIS contains several unfortunate mistakes regarding the Cerro Wire site, and these misstatements need to be corrected in the FEIS. The FEIS prepared for The Mall at Oyster Bay demonstrates that neither "hazardous materials" nor "contaminated materials" are present in significant quantities on the Cerro Wire site. As noted in that FEIS, "Soil and groundwater at the project site was extensively investigated by numerous consultants between 1986 and 1992. The site was decommissioned, and remediation was completed to site-specific cleanup levels approved by NYSDEC. The sampling and analytical methods were approved by the NYSDEC. After the remediation plan was completed, the NYSDEC delisted the site from the Registry of Inactive Hazardous Waste Disposal Sites." The East Side Access FEIS should correct all misstatements regarding the Cerro Wire site. (Archer 2)

**Response:** The discussions of the Cerro Wire site in the FEIS are revised to correctly describe the conditions at the site.

**Comment 70:** The proposal for an expansion of the rail yard in Babylon should go no further, as it is totally unacceptable to the various elected officials of all the municipalities surrounding the Babylon Yard; the local residents of West Islip and Babylon Village; and myself. To propose the condemnation of commercial and residential properties, thereby uprooting families and causing the loss of jobs, to expand a facility that has clearly proven itself to be extremely intrusive and a nuisance to the residential community that abuts it on its northern perimeter is absurd. (Johnson 1)

**Response:** Please see the response to Comment 55.

**Comment 71:** In observing the problems that have occurred with the proposed train storage sites in other localities and considering the strong opposition to the Babylon Yard expansion, I would strongly recommend that, in the future, MTA confer directly with state representatives before recommending such projects in their respective districts. (Johnson 2)

**Response:** Please see the response to Comment 55.

**Comment 72:** The LIRR plan fails to make long-term plans for additional rights-of-way. The DEIS explains that most growth in labor force on Long Island will occur in Suffolk County, but the current LIRR plan leaves in place the three "spokes"—the Port Jefferson, Ronkonkoma, and Montauk Branch lines—with no plan to connect these lines east of Hicksville. LIRR planners should consider a right-of-way link from the Port Jefferson Branch to the Main Line

at or near Ronkonkoma and another link between the Montauk Branch and the Ronkonkoma Line at Yaphank. Under this scenario, the locations for the Port Jefferson Branch yard should be reconsidered. I am aware of several large industrially zoned pieces of property off of Comsewogue Road in Port Jefferson along the LIRR right-of-way that could be used for a yard near the end of the Port Jefferson line. (Ramage 7)

**Response:** Changes to LIRR rights-of-way and routes east of Jamaica do not address the goals and objectives of the East Side Access Project, which is intended to improve capacity into Manhattan and provide new access to Manhattan's East Side. Separately from the East Side Access Project, LIRR will continue to evaluate its future needs and identify solutions to expected problems. Please also see the response to Comment 55.

#### LAND USE, ZONING, PUBLIC POLICY, AND SOCIAL CONDITIONS

**Comment 73:** Zoning and land development patterns in Manhattan indicate that future business development is most likely to occur west of Fifth Avenue down along the Hudson River waterfront. Thus, Penn Station is ideally suited to meet the future demands of commuters and should be a transit hub positioned to distribute commuters to the West Side of Manhattan. (Fruchtman 2)

**Response:** The East Side Access Project would increase LIRR's capacity to Manhattan by approximately 43 percent. By 2020, with the project more than 67,000 peak-period commuters would travel directly to GCT, freeing up space in Penn Station and on the already overcrowded Penn Station-bound trains for future growth potential on the West Side of Manhattan. This would allow Penn Station to continue to meet the future demands of commuters.

**Comment 74:** The DEIS argues that intensive commercial development around Penn Station is not practical because of current zoning law (page 3-15). However, if the law could be changed, might this be part of an adequate alternative to this major infrastructure investment? Although this is not the purview of the MTA, were strategies for coordination with the city considered? City zoning changes in the 1980's were intended to decongest East Midtown and encourage development farther west. Yet the East Side Access Project would strengthen East Midtown as the center of commercial growth for the region. How was the decision made to do this? How is this part of a long-term plan for the growth and development of the New York region? (Schank 11)

**Response:** The East Side Access Project strives to achieve two primary goals: to relieve train traffic congestion in the area of Penn Station and to improve travel times from Long Island to East Midtown Manhattan. Since any increase in LIRR service to Penn Station is constrained by a number of factors (discussed in Chapter 1 of the DEIS), the ability of the regional transportation system to bring commuters from Long Island to Manhattan is likewise constrained. Any initiative to increase commercial development around Penn Station, without

either increasing capacity into Penn Station or siphoning off commuters who currently travel into Penn Station but have East Side final destinations, would only exacerbate commuter rail capacity constraints at Penn Station by increasing demand for service to Penn Station without increasing the supply of trains. While City or other policies to intensify development in the vicinity of Penn Station would be supported by the East Side Access Project, the growth and development of the New York region depends, in part, on higher transit capacity from Long Island to Midtown Manhattan. By establishing service to the East Side of Manhattan and better balancing commuter service to match commuter destinations, the East Side Access Project would better serve development in the Penn Station area.

**Comment 75:** The DEIS should evaluate the consistency of the proposed action with current public policies, including consistency with the goals and objectives of the MTA's ongoing study of airport access to JFK. (Rose 5)

**Response:** The DEIS includes an evaluation of the project's consistency with current public policies in Chapter 3, "Land Use, Zoning, and Public Policy." In addition, the planning context for the project is detailed in Chapter 1, "Project Purpose and Need" (see page 1-19). As described in Chapter 1, East Side Access was developed as part of MTA's Long Range Planning Framework and is and will continue to be coordinated through that process.

**Comment 76:** The DEIS should describe more fully the City's planning and economic strategy for Long Island City, and focus in particular on how pedestrians will get from the new LIRR station to the new commercial center contemplated in the proposed zoning. Improvements will be required along the Queens Boulevard bridge, which is the pedestrian connection between the new station, the Queens Plaza and Queensboro Plaza subway stations, and the area to be rezoned. (Rose 6)

**Response:** The DEIS includes a discussion of the City's policies for Long Island City in Chapter 3 (see pages 3-36 and 3-41). This discussion has been expanded in the FEIS. Connections between Sunnyside station and Queens Plaza and Queensboro Plaza will be studied as part of MTA's upcoming \$2 million study, and coordination will continue between MTA and DCP with regard to the design of Sunnyside station and its pedestrian connections.

**Comment 77:** I concur that a new Long Island City LIRR station would help maintain and further Long Island City as a business center and reduce congestion in Manhattan and Queens. (Nolan 4)

**Response:** Comment noted.

**Comment 78:** In Chapter 3, page 3-18, Table 3-2, the total acres adds up to 283,800, not 183,700, and the percent of total is over 154 percent, not 100 percent. Please check the numbers. (Chiang 4)

**Response:** The table has been revised (see the FEIS) to more clearly indicate that the second, third, and fourth lines (estates and low density, medium density, and high density) are types of residential use and thus subsets of the first line (residential). The acres of these residential uses are not included in the total, since the table also includes a line for total residential use.

**Comment 79:** Chapter 4, page 4-3, the % symbol can be eliminated. Please check all tables for consistency. (Chiang 5)

**Response:** The tables have been checked and revised where appropriate for consistency.

## ECONOMIC CONDITIONS

**Comment 80:** The DEIS does not provide a list of underground easements that would be required to construct tunnels. (Gualtieri 3)

**Response:** Since the exact alignment of new tunnels leading from the existing 63rd Street Tunnel to GCT would not be finalized until preliminary engineering is complete, it is not appropriate at this time to complete a final list of underground easements needed to construct tunnels. The DEIS does include drawings that show the proposed tunnel routes (see Figures 2-13 and 2-14 in Chapter 2, "Project Alternatives"). Those drawings depict the specific buildings above the tunnel routes. The DEIS indicates that easements would be required; the specific easements to be purchased would not affect any of the analyses or conclusions in the DEIS related to environmental impacts. Please also note that the FEIS includes a revised project alignment in Manhattan with a two-level station at GCT. This design was developed to improve operational reliability and to reduce the number of easements required, among other factors.

**Comment 81:** The analysis of the real estate market is incorrect and outdated. It includes a claim that there is a 25 percent retail vacancy rate in Midtown Manhattan and that there is significant availability in the office market for the easy relocation of tenants. Contrary to the DEIS, relocating the retail and office tenants from 47 East 44th Street will be extremely difficult and will likely result in hardship and disruption to tenants not covered by the Federal Uniform Relocation Assistance and Real Property Act of 1970. (Epstein 2)

**Response:** The analysis of real estate trends in Chapter 5, "Economic Conditions," indicates that the real estate market is very tight in Manhattan. With respect to office space, the chapter notes (see pages 5-10 and 5-11 for the discussion of existing conditions in Manhattan), "By mid-year 1999, the overall [office] vacancy rate in the Manhattan study area was a very low 8.0 percent of total

inventory, according to Cushman & Wakefield's *1999 Mid-Year Report*. . . Midtown Manhattan is the area most attractive to prospective tenants, and can therefore support higher rental rates." The DEIS does not indicate that there is significant availability in the office market for easy relocation of tenants.

With respect to the retail vacancy rate, the DEIS was incorrect in stating that Midtown Manhattan had a retail vacancy rate of 25 percent in mid-year 1999. Garrick-Aug Associates, a major retail real estate firm in Manhattan, reports that the mid-year 2000 retail vacancy rate for Midtown Manhattan is less than 5 percent, which more accurately reflects the tight market conditions described in the DEIS analysis (Source: telephone call, Faith Consolo, vice chairman, Garrick Aug, July 13, 2000). However, as stated in the DEIS, suitable relocation resources continue to exist. Garrick-Aug Associates also reports that at year-end 1999 there were over 4 million square feet of vacant retail space in Manhattan, and over 1,000 stores available of less than 2,500 square feet (Source: *Manhattan Retail Space Report; Year-End 1999 Analysis*, January 1, 2000). The text in the FEIS is corrected to reflect the current retail vacancy rate.

As described at the end of Chapter 5, the Federal Uniform Relocation Assistance and Real Property Act requires the federal agency to pay property owners just compensation for their property, and to provide to displaced owners and tenants relocation and moving expenses.

**Comment 82:** While Amtrak fully anticipates continuing active cooperation with MTA/LIRR on the East Side Access Project, it is not clear what is meant by the statement on page 5-30 that "negotiation ... in regard to construction and operation of the East Side Access Project will take place within [an] already established leasing relationship." Amtrak is under the impression that a new agreement specific to the project is contemplated. (Ernst 4)

**Response:** The text of the FEIS is revised to indicate that MTA/LIRR and Amtrak will continue to coordinate in relation to the East Side Access Project, and it is anticipated that a specific agreement will be developed for issues related to this project.

**Comment 83:** The DEIS should analyze further the impact on existing Amtrak retail revenues at Penn Station, and the development plans for that station due to the significant decrease in LIRR commuters at that station. (Ernst 36)

**Response:** The DEIS includes a discussion of the effects of East Side Access on the retail spaces at Penn Station in Chapter 5, "Economic Conditions" (see page 5-24). This analysis concludes, "The reduction in passengers at Penn Station would decrease annual spending in and around Penn Station at local retailers. The decrease in spending would not constitute a significant adverse impact."

According to information prepared by the ARC project, Penn Station is the busiest commuter terminal in the nation, with as many as 500,000 commuters

each day. As reported in the Environmental Assessment for the Pennsylvania Station Redevelopment Project (August 1999), roughly 84,300 of these passengers travel on Amtrak and NJ Transit. An additional 231,000 passengers travel on LIRR, and the remaining commuters (approximately 185,000 people) use the New York City subway system. As described in the DEIS, in 2010, because of the shift in passengers to Grand Central as a result of East Side Access, the number of LIRR passengers at Penn Station daily is expected to be approximately 151,000, compared with 217,000 in 1995 and 231,000 in 1999. (Detailed ridership numbers for both 2010 and 2020 are presented in Appendix C to the DEIS.) However, as noted in the Environmental Assessment prepared for the Pennsylvania Station Redevelopment Project, the number of Amtrak and NJ Transit riders at Penn Station is expected to grow by some 43,300 passengers per day as a result of a number of improvements proposed (including the Kearny Connection and Secaucus Transfer projects in New Jersey) and introduction of high-speed Amtrak service. The number of subway passengers and other pedestrians who pass through Penn Station can also be expected to increase as a result of general background growth. Further, the number of people who pass through Penn Station is also expected to increase as a result of the proposed improvements associated with the Farley project. Overall, these factors support the DEIS's conclusion that the reduction in riders to Penn Station as a result of the East Side Access Project would not result in significant adverse impacts to the retail spaces at Penn Station.

## HISTORIC RESOURCES

**Comment 84:** The State Historic Preservation Office (SHPO) has reviewed the submitted DEIS (including the Draft Programmatic Agreement) under the provisions of Section 106 of the National Historic Preservation Act of 1966. SHPO is comfortable with both the DEIS and the Draft Programmatic Agreement and has no substantive comments at this time. (Adams 1)

**Response:** Comment noted.

**Comment 85:** The comments of the City of New York Landmarks Preservation Commission (LPC) on the DEIS are as follows. The SHPO is the lead agency for architectural and archaeological review. LPC will consult with SHPO with regard to their findings for this project in both areas. The DEIS text appears adequate for architecture. Any work on New York City designated landmark properties requires a permit from the LPC preservation department. (Santucci 1)

**Response:** Comment noted. The project will coordinate with LPC for any work on landmarked properties.

**Comment 86:** The United States Department of the Interior concurs that there are no prudent and feasible alternatives to the project but can only conditionally agree

with measures to minimize harm to cultural resource values. We note the inclusion in the Appendices of the DEIS of a Programmatic Memorandum of Agreement (PMOA), but that document is yet to be signed. We understand that SHPO is satisfied with the language of the PMOA as far as it goes, but there remains considerations being given to some of the other historic sites out onto Long Island which may result in further stipulations to be included. Therefore, we condition our agreement with measures to minimize harm to be explicitly consistent with the final/duly signed PMOA. We are processing this project as a Section 4(f) because of the potential or probable effects to GCT and 22 other historic properties.

It seems clear there is potential for adverse effects to cultural values, if not measurable impacts in the project as it now stands. These are at least, in part, spoken to in the Mitigation Measures sections of the Historic Resources and Archaeological Resources chapters of the DEIS. The Department of the Interior can only conditionally offer agreement to the Mitigation Measures as developed thus far, and urgently recommends that these measures be completed to the satisfaction of the SHPO and a duly signed PMOA be incorporated in the FEIS. (Taylor 1)

**Response:** Comment noted. The signed Programmatic Agreement among the FTA, MTA, and SHPO outlines specific measures to minimize harm to historic and/or archaeological resources, beginning with a commitment to continue consultation with SHPO after completion of the FEIS. Please note that Chapters 7, “Historic Resources,” and 8, “Archaeological Resources,” in the FEIS are revised to indicate that SHPO has agreed with the analyses conducted for the sites on Long Island. Consistent with the comments of the U.S. Department of the Interior, the executed Programmatic Agreement will ensure that measures to minimize harm are employed and that, therefore, no significant adverse impacts would occur to historic or archaeological resources. With the Programmatic Agreement in place, the project would not result in Section 4(f) issues.

**Comment 87:** Proposed changes to the landmarked Biltmore Room in GCT would significantly alter the visual character of the terminal, despite DEIS claims to the contrary. Although the removal of the temporary newsstand in the middle of the room would help restore the room’s character, it would not compensate for the major visual changes produced by new escalators to be installed at the northern end of the room. The newsstand should be removed, and this historically significant room should be preserved, without the intrusion of escalators. (Schank 6)

**Response:** The possible escalators that would be added to the Biltmore Room under Option 2 (the preferred engineering option) would be an integral part of the connection between the LIRR concourse space and the upper level of GCT. They would provide the only direct connection between GCT’s upper level and the LIRR concourse below.

As stated in Chapter 7 of the EIS, for changes to the Biltmore Room as well as all project elements in GCT, “the design would be developed in

consultation with SHPO [the State Historic Preservation Office at the New York State Office of Parks, Recreation and Historic Preservation] to ensure that no adverse effects would occur to the building. A construction protection plan would also be implemented to minimize the effects of construction on the historic features of the building, so that construction does not result in any structural or architectural impacts to these features. The plan would be developed in consultation with SHPO and approved by SHPO prior to start of construction.” SHPO’s consultation is formalized through a Programmatic Agreement executed by SHPO, FTA, and MTA.

During the recent renovation of GCT, two escalators, one just outside the New York Transit Museum store and one just west of the Grand Central Market, were constructed within the landmarked interior areas of GCT, in consultation with SHPO, in a manner that did not significantly alter the visual character of the terminal. Further, the Biltmore Room’s historic use was as a passenger waiting room, and the proposed changes to the Biltmore Room would again promote use of that room by passengers.

**Comment 88:** Amtrak has insufficient information to judge at this point whether it concurs in the determination that Signal Tower F and Switch Tower Q meet the eligibility criteria for inclusion in the National Register, but reserves the right to review this determination. (Ernst 37)

**Response:** The determination that Signal Tower F and Switch Tower Q are eligible for the State and National Registers was made by New York State’s State Historic Preservation Office, following the Secretary of the Interior’s Standards and Guidelines for Evaluation, as part of its review of the East Side Access Project, according to the provisions of the National Historic Preservation Act (36 CFR Part 60). The documentation supporting the SHPO’s determination of eligibility is provided in Appendix B to the EIS.

**Comment 89:** The Department of Buildings has a procedure for monitoring vibrations that may affect landmark buildings. It is requested that this procedure be followed if work adjacent to Lever House or any other landmark or historic structure is necessary. (Visconti 2)

**Response:** The Department of Buildings’ procedure for monitoring vibrations would be followed where work adjacent to historic structures is necessary.

## TRANSPORTATION

### *EFFECTS ON SUBWAYS*

**Comment 90:** Impacts to the Lexington Avenue subway have been glossed over. You cannot fit six more people per car on the Lexington Avenue subway line, as the DEIS calls for. (Adler 2, Epstein 8, Maloney 3)



The DEIS downplays the impact of new riders on the Lexington line. Although 6 new riders on the Nos. 4 and 5 trains does not sound like very many, in reality it would make a big difference. First of all, these trains are already operating at greater than 100 percent of capacity. Secondly, the new riders would not be evenly distributed throughout a given train. Riders tend to board a train based on their station entrance and exit points, not necessarily in a uniform manner. (Schank 3)

**Response:** The DEIS analyzes the East Side Access Project's effects on the Lexington Avenue subway line in detail in Chapter 9, section C, with a summary in Chapter 9, section A. In particular, impacts to the Lexington Avenue subway are discussed on pages 9A-3 to 9A-5, and 9C-45 to 9C-52 of the DEIS. Section 9C provides a detailed discussion of all impacts to the Lexington Avenue subway mezzanine, stairwells, platforms, and line-haul capacity, as well as a discussion of measures to mitigate these impacts. Section 9A summarizes these impacts and potential mitigation. These impacts are also discussed in the Executive Summary, on pages S-32 to S-34 and on Table S-3 (page S-21).

The DEIS acknowledges that the new passengers added by the East Side Access Project would exacerbate the existing overcrowding occurring on the Lexington Avenue line at 42nd Street. It then discusses mitigation measures to address the problems occurring at that station.

**Comment 91:** The DEIS discusses the capacity issues on the New York City subway lines from Queens and the difficulties for LIRR commuters who have destinations on the East Side of Manhattan. While the build alternatives are expected to perform well in relieving capacity problems on Queens subway lines and the overall LIRR system, while also reducing the amount of vehicle trips into Manhattan, we are concerned with the implications for the other aspects of the system. Particularly we are concerned that the volume of LIRR passengers to GCT will seriously and adversely impact the Lexington Avenue subway. The DEIS uses the amount of overcapacity (v/c ratio of 1.22) on the Queens subway lines (the F and E lines) as a rationale for a need for action; however, that ratio will be nearly realized on the Lexington Avenue subway (v/c ratio of 1.17), but there is no mitigation offered. (Hargrove 1)

**Response:** With respect to the project's effects on the Lexington Avenue subway and the mitigation offered, see the response to Comment 92. Please note that the DEIS does not use the amount of overcapacity on the Queens subway lines as a rationale for a need for action. The DEIS does describe the crowded conditions on Queens subway lines, including the v/c ratio, in Chapter 1, "Project Purpose and Need," (page 1-10) as a way of explaining that the entire corridor between Long Island and Queens—particularly as it affects commuters from Long Island—is overcrowded and warrants a capacity expansion. The discussion of the Queens subway lines is provided in that context, together with a discussion of crowding on the LIRR and highways. As noted in the DEIS (page 1-10), "It is clear that the subway—because it, too, operates at capacity—is not a long-term option as an alternative route for LIRR riders into

Manhattan. For instance, the Queens Boulevard lines (E, F and R) are severely overcrowded. . . .”

**Comment 92:** Mitigation proposed for impacts to the Lexington Avenue subway line-haul capacity is unconvincing and amounts to cajoling passengers on the line to move faster or get out of the way. (Russianoff 3)

Some of the mitigating measures proposed will not accomplish very much at all. For example, the “Step Aside” program does not actually work without enforcement personnel. (Schank 2)

Building more stairways to the Lexington Avenue subway platforms as a means of alleviating projected crowd conditions does not take into account the fact that people board the train based on where they want to get off, not where they descend onto the subway platform before getting on. (Adler 3)

Signal adjustments to the Lexington Avenue subway line will not be enough to mitigate the negative impacts brought about by East Side Access. (Maloney 5)

I do not believe that any mitigating actions to increase capacity on the Lexington Avenue line are planned as part of the East Side Access Project. Something must be done to increase capacity. Efforts to improve passenger movements in and off trains have been unsuccessful in the past and I am therefore skeptical they will work in the future. (Nolan 2)

New signal equipment, better tracks and turnstile management will indeed benefit Lexington Avenue subway patrons and should be pursued even without the project, but it is unrealistic to believe that these will noticeably affect service during an additional deluge of arriving LIRR passengers. (Aryel 1)

According to the DEIS, the impacts of the project on the Lexington Avenue subway would only be partially mitigated. This is not satisfactory. (Schank 1, Zupan 2)

East Side Access would result in intolerable crowding on the Lexington Avenue line; the impact statement acknowledges that the full benefit of East Side Access will not be realized because potential riders of the new service will shun GCT due to the crowded conditions on the Lexington Avenue subway line. (Russianoff 2, Schreibman 1, Zupan 3)

The DEIS mentions the possibility of the MESA, Second Avenue subway, but does not account for MESA in the environmental analyses nor as mitigation to relieve the pressures on the Lexington Avenue line. To a certain extent, the completion of East Side Access could force an action on the Second Avenue subway and makes for a more compelling case for the Second Avenue subway’s completion in conjunction with the completion of this project. (Hargrove 2)

**Response:** The DEIS analyzes the East Side Access Project's effects on the Lexington Avenue subway line in detail in Chapter 9, section C. It then describes mitigation measures that would alleviate the project's impacts on the Lexington Avenue line. MTA NYCT is committed to solving the overcrowding problems on the Lexington Avenue line and will continue to address the situation until it is corrected.

The primary factor affecting the number of trains that can travel on the Lexington Avenue line during the peak period (the "throughput") is the "dwell" time, or the time the train must spend in the station while passengers exit and enter the train. In addition to the "step aside and speed the ride" campaign, NYCT, in collaboration with the East Side Access Project team, is pursuing a number of other means of reducing dwell times and improving train throughput at 42nd Street:

- 1) Using platform assistants and subway cars with wider doors, access into and out of the train at all doorways can be improved.
- 2) Adding and reconfiguring stairwells that lead from the mezzanine to the subway platforms can better distribute passengers to all areas of the platform, leading to a better distribution of passengers within each train. While subway cars would continue to be crowded during rush hours, the front and rear cars on the trains are less crowded than the middle and can accommodate more passengers. At 42nd Street, people are more likely to board the train where they descend onto the station platform, since circulation from one part of the platform to another may be affected by the constraints posed by waiting, boarding, and alighting passengers, as well as by the frequency of arriving trains. Therefore, stairways that provide access to the ends of platforms can help passengers access the portions of trains that are less crowded, thereby more evenly distributing the load of passengers on each train.
- 3) Directing subway passengers in GCT towards less used access points to the Lexington Avenue subway mezzanine can help increase the usage of new stairwells that lead down onto the subway platforms.

In addition, the DEIS also notes that MTA is pursuing plans to develop a Second Avenue subway to extend the entire length of Manhattan's East Side, bringing critical relief to the Lexington Avenue subway. A total of \$1.05 billion has been allocated in MTA's 2000-2004 Capital Program for a full-length Second Avenue subway project. Construction of the Second Avenue subway, which is itself a multibillion dollar undertaking, is a separate and distinct project from East Side Access, serving independent goals and objectives.

Regarding East Side Access's benefits, while the Preferred Alternative would improve access to the entire East Side of Manhattan, its primary goal is to improve access to East Midtown Manhattan. Ridership forecasting models indicate that, consistent with this goal, the vast majority (almost 90 percent) of the 66,000 commuters arriving at GCT in the morning peak period in 2020 would walk, not transfer to the subway, to reach their final destination. The majority of commuters destined for Lower Manhattan would continue to arrive at Penn Station and transfer to West Side subway lines to reach their

downtown destinations. The Preferred Alternative would not drastically improve travel time to the lower Manhattan CBD, so continued use of Penn Station by these commuters should not be considered a failure of East Side Access to achieve its full benefit.

**Comment 93:** The DEIS is stunningly silent on the Second Avenue subway. The DEIS is incomplete without a discussion of the way the Second Avenue subway will alleviate some of the environmental problems created by East Side Access. A supplemental DEIS should discuss the importance of the Second Avenue subway to provide an outlet for the new passengers when East Side Access is complete. (Maloney 2)

Any mitigation efforts not including a full-length Second Avenue subway will be utterly ineffective. (Aryel 1)

The East Side Access Project should be constructed simultaneous to construction of a full-length Second Avenue subway. Once East Side Access is built, crowded conditions on the Lexington Avenue subway line will worsen, requiring a full-length Second Avenue subway to mitigate this condition. (Schreibman 2, Duane 1, Zupan 1, Russianoff 4, Pearlstein 4, Maloney 1, Azumah 1, Elmer 1, Cornelius 2, Aryel 1, Nolan 3, Schank 4)

The FEIS should study the effects of constructing the full-length Second Avenue subway and commit to it in the Record of Decision issued for East Side Access. The combination of East Side Access and the Second Avenue subway should be the Preferred Alternative in the FEIS. (Schreibman 2, Zupan 4, Russianoff 6, Maloney 5)

I favor a four-track Second Avenue line from 180th Street down to Grand Street, with two tracks continuing to Dyre Avenue and to Pelham Bay Park Stations should be placed every half mile. (Hitch 2)

The people who want the Second Avenue subway are not the people who want East Side Access. The people who want East Side Access voted for the Governor and the people who want the Second Avenue subway did not. The status of East Side Access versus the Second Avenue subway is an example of political pandering and, perhaps, graft. (Pearlstein 5)

**Response:** The MTA has allocated \$1.05 billion for the Second Avenue subway project, which would relieve the overcrowding on the Lexington Avenue line. However, that project should not be considered as a mitigation measure for the East Side Access Project's impact on the Lexington Avenue subway at Grand Central Terminal. The Second Avenue subway is a separate and distinct major capital project with distinctly different goals and objectives and is intended to address needs that extend well beyond the incremental congestion on the downtown Nos. 4 and 5 trains at Grand Central identified in this EIS. Construction of the Second Avenue subway, which is itself a multi-billion dollar undertaking, must be considered as a separate and distinct project serving independent goals and objectives, rather than as related to East Side Access. As a result, the Second Avenue subway project should not be

identified as a mitigation commitment in the Record of Decision prepared for the Preferred Alternative.

The East Side Access DEIS analyzes and describes the project's effects on conditions on the Lexington Avenue subway line in Chapter 9, Section C (see the response above). The DEIS also describes MTA NYCT's proposal for a new subway beneath Second Avenue. As noted in the DEIS, NYCT is currently conducting the Manhattan East Side Transit Alternatives (MESA) study, which is intended to improve mobility and reduce transit crowding on Manhattan's East Side. This study is identified in the East Side Access DEIS on pages S-34, 9A-5, and 9C-50. A DEIS for MESA was completed in August 1999. The East Side Access Project DEIS also notes (see pages 9C-50 and 9C-51) that MTA has plans to construct a full-length Second Avenue subway that will extend generally along Second Avenue from 125th Street in East Harlem to the Financial District in Lower Manhattan, and that the MESA Study is an important and necessary step in the planning for the Second Avenue subway project. The DEIS goes on to say that this new Second Avenue subway has as a goal the "reduction of peak hour demand on the Lexington Avenue subway, reducing delays in passenger loading and unloading at major stations, including 42nd Street, and thus increasing train capacity by allowing better train throughput" (page 9C-52).

**Comment 94:** The project should move forward now because it is further along in the process than the Second Avenue subway. (Elmer 3, Olmstead 3)

This project should not be held up for the Second Avenue subway. (Troy 3, Landers 2)

**Response:** Comments noted. The preliminary construction staging schedule shown in the DEIS (Figure 17-1) is based on commencement of construction in late 2000/early 2001.

**Comment 95:** What would the impact on transit revenue be when LIRR riders walk rather than use transit once they arrive in Manhattan? (Schank 14)

**Response:** As described throughout the DEIS, East Side Access would allow many LIRR commuters bound for Manhattan's East Side to avoid using NYCT subways to complete their journeys to work. As is shown in the ridership forecasting appendix (see Tables 4-7 and 5-7 in Appendix C of the DEIS), with East Side Access in place, a decrease in weekday subway ridership of 12,247 riders would occur in 2010 and 12,955 riders in 2020 compared to the No Action. These riders are not only on subway trains from Penn Station, but also subway trains from Queens, since with the project, LIRR commuters bound for the East Side of Manhattan would no longer choose to transfer in Queens for the subway. Systemwide, the daily loss of revenue in 2000 dollars in comparison with the No Build condition would be \$70,500; and on an annual basis, \$15.1 million (please note that the average fare per rider is less than \$1.50). This has been reflected in the FEIS (see pages 5-37 and 22-20). In comparison

to existing conditions, however, there would be virtually no revenue lost since it is estimated that growth between now and 2020 (No Action) will generate 12,000 new riders.

*EFFECTS ON OTHER RAIL TRANSPORTATION PROVIDERS*

**Comment 96:** The lack of specifics in the DEIS, combined with the very real potential for serious impacts to Amtrak train service, means additional work is necessary to understand project impacts and appropriate mitigation. (Ernst 1A)

**Response:** The level of detail in the DEIS is appropriate for an Environmental Impact Statement and provides the correct level of information to analyze, describe, and disclose potential environmental impacts to concerned parties. The very specific design details requested by Amtrak in their comments are of interest only to a small audience. For this reason, the East Side Access team has met with Amtrak regularly in a series of monthly coordination meetings beginning in January 1999 that involved both technical and operational personnel. At these meetings, additional supporting materials were provided for review by Amtrak. The details provided in the DEIS, together with the responses to comments and corrections provided in the FEIS, provide appropriate information for FTA to issue a Record of Decision for the project.

**Comment 97:** Throughout the DEIS, the baseline drawings used for Sunnyside Yard are outdated and do not reflect current conditions at the yard. For example, the access roadway from 42nd Place to the new high speed rail service and inspection facility is not indicated, and the impact of the fourth loop track on this roadway is not discussed. Use of up-to-date and more complete drawings would allow a more complete determination of whether the East Side Access Project would result in impacts to buildings, track, catenaries, substations, and utilities. (Ernst 2)

Without elevation drawings of proposed construction at and about Sunnyside Yard, it is not possible to assess the potential for impacts from the East Side Access Project to the existing electric substations, utility tunnels, air compressor station, utilities, catenaries, and other existing facilities at the yard. (Ernst 3)

**Response:** In response to this comment, the base maps of Sunnyside Yard are updated in the FEIS. Please note, however, that the drawings provided in the main volume of the DEIS are intended to be illustrative of the analysis presented in the text and are not intended to be used as engineering drawings.

As described above in response to Comment 96, the East Side Access team has met with Amtrak regularly during the EIS process to present supporting information that is specifically of interest to Amtrak. The East Side Access team will continue to meet and coordinate with Amtrak throughout the project design process. Drawings will be provided for review by Amtrak, and all construction packages will be field-verified and submitted for review by Amtrak.

Further, as noted in Chapter 13 of the DEIS, “Utilities,” a detailed field survey of utilities is being conducted and a utility relocation report is being prepared by the project designers. This report will also be provided to Amtrak for review.

Regarding impacts to the roadway from 42nd Place as a result of construction of the loop track, East Side Access will maintain access to this area throughout construction.

**Comment 98:** Plans for the yard do not appear to include a connection between Amtrak and the New York & Atlantic Railway on subtrack 4; loss of this planned connection would impact Amtrak plans for mail and express business deliveries. (Ernst 17)

**Response:** A new connection that would allow Amtrak to gain access to NYAR would be provided by East Side Access as part of the LIRR maintenance facility at Yard A/Arch Street.

**Comment 99:** The Harold Interlocking at Sunnyside Yard should include both an eastward and a westward bypass; without both bypasses, Amtrak’s service—and particularly its critically important high speed rail service between Boston and Washington, D.C.—will be compromised. (Ernst 30)

**Response:** The East Side Access Project would not adversely affect Amtrak’s operating capacity through Harold in an eastward direction. When East Side Access is complete, Amtrak’s eastbound service would operate exactly as it does today. Amtrak trains would use exactly the same routing as they do today, with the same degree of flexibility. East Side Access trains would operate on separate, parallel tracks and consequently would have no effect on eastbound Amtrak service. The project would include a westbound bypass, which would significantly improve Amtrak’s operating capacity in the westward direction.

**Comment 100:** Control of dispatches for Plaza Interlocking needs to be with Penn Station Central Control to allow for proper functioning of connections through Harold Interlocking and Sunnyside. Otherwise, delays in Amtrak Northeast Corridor service are inevitable. (Ernst 32)

**Response:** The East Side Access Project would address the control of Plaza Interlocking in the context of the entire LIRR system, including the Penn Station Control Center and the proposed new Jamaica Control Center. This would provide for efficient and reliable operation of all train routings.

**Comment 101:** The existing software used at Penn Station for controlling train operations and movements at Penn Station and Harold Interlocking will need modification each time Harold Interlocking is changed and will need to accommodate

AC and DC plate changes. The East Side Access Project should make provisions to deal with these project-created changes and costs. (Ernst 34)

**Response:** East Side Access would provide all necessary modifications at the Penn Station Control Center.

**Comment 102:** It is not clear whether the DEIS assumes at page 9B-4 that new track capacity at Penn Station as a result of fewer LIRR trips into the station will be utilized by Metro-North Railroad. If so, note that future use of these slots is up to Amtrak, and a determination of their use cannot be made at this point. (Ernst 35)

**Response:** The DEIS does not assume that the new capacity at Penn Station would be used by Metro-North; rather, it indicates that once this capacity is available, it allows Metro-North the possibility of implementing such new service. Moreover, MTA does not agree with the assertion that future use of LIRR slots at Penn Station is up to Amtrak. The text in the EIS has been clarified regarding this point (see page 9B-4).

#### *TRAVEL TIME SAVINGS OF EAST SIDE ACCESS*

**Comment 103:** The travel time savings to be realized by passengers using the new East Side Access service is overstated due to the depth of the terminal beneath GCT and the increased time required to rise up to the surface. (Fruchtman 5)

**Response:** Either engineering option of the Preferred Alternative would save time for commuters with destinations on the East Side of Manhattan. Option 2 would be designed with multiple, high-speed escalators, allowing passengers easy and unconstrained egress from the terminal. In contrast, commuters exiting from Penn Station must spend minutes waiting in queues to exit from platforms and stairways. Overall, the time spent exiting from Penn Station and from Option 2 at GCT would be similar, and in no way would the time spent exiting from Option 2 eliminate the time savings for LIRR commuters with destinations on the East Side.

**Comment 104:** There would be no savings in train travel time to GCT because the distance to each terminal is about equal; thus any savings from commuters “doubling back” is fictitious. (Fruchtman 6)

**Response:** While the travel time on the train to Penn Station and GCT would be essentially the same, a new terminal on the East Side of Manhattan would bring many commuters closer to their final destinations on the East Side. This would shorten the total amount of time those commuters spend traveling to and from work each day, by eliminating time spent riding the subway or in other modes traveling from Penn Station to their workplaces.



*PEDESTRIAN CONDITIONS*

**Comment 105:** Congestion on sidewalks in the Madison and Lexington Avenue areas near GCT should be considered in connection with the East Side Access and should be included in this DEIS. (Epstein 7)

**Response:** The impacts of the Preferred Alternative on sidewalk congestion in the Madison and Lexington Avenue areas near GCT, along with suggested mitigation of those impacts, are discussed on pages 9C-52 to 9C-58 of the DEIS. Additionally, Figure 9C-5, following page 9C-14, provides a graphic display of the locations where pedestrian impacts at the street level were analyzed.

**Comment 106:** A street tree survey for the project site should be conducted in conjunction with landscaping recommendations. All potential tree removals should be disclosed in the EIS. Any street trees removed by the applicant must be replaced pursuant to Parks' Basal Area Replacement Formula. A tree survey and removal/replacement plan must be reviewed and approved by the Commissioner. (Laird 2)

**Response:** The DEIS discusses a number of potential strategies for mitigating pedestrian impacts of the project in the vicinity of GCT. These strategies include clearing or limiting street furniture; relocating refuse bags awaiting pickup; and relocating sidewalk vendors, newspaper kiosks and flower boxes; among other measures and potentially relocating two modest-size trees. These strategies would be implemented by the New York City Department of Transportation, the Grand Central Partnership, or other appropriate entities, if they determine the measures are warranted. Should the project require the removal of street trees, those trees would be replaced pursuant to the New York City Department of Parks and Recreation's Basal Area Replacement Formula, in consultation with the Parks Department. The text in the FEIS reflects this.

*PARKING CONDITIONS*

**Comment 107:** The DEIS does not thoroughly detail a workable strategy for dealing with the parking shortages at LIRR stations that would result from the project. Attempting to switch riders from one station to another with fare incentives may work if it is coordinated with schedules; a specific plan for doing this should be outlined in the final EIS. Also, given the track record for feeder bus service on Long Island, why is it assumed that feeder bus service will work at this time? Since the vast majority of LIRR riders drive to their local station, and one of this project's main goals is to increase LIRR ridership, parking mitigation is vital to the success of this project. The final EIS must consider other measures to substitute for the ones above. (Schank 7)

**Response:** The range of parking mitigation or accommodation options outlined on page 9E-33 of the DEIS is intended as a framework for dealing with parking

shortfalls projected for some LIRR stations on Long Island. Since the LIRR owns fewer than 1/3 of the parking lots at LIRR stations on Long Island (the vast majority of the parking facilities fall under the jurisdiction of either the local town, village, or other local governing entity), any detailed strategy for expanding parking must be developed in conjunction with and tailored to local jurisdictions, subsequent to the finalization of East Side Access service plans.

Regarding feeder bus service, this measure is intended merely as one component in a set of responses to parking shortfalls on Long Island and should not be considered as a stand-alone means of mitigating the problem of parking shortfalls at LIRR stations on Long Island.

#### *VEHICULAR CONGESTION*

**Comment 108:** The DEIS projects that East Side Access would help to reduce vehicle miles traveled (VMT) and highway congestion. Does this projection take into account the pent-up demand for automobile transportation currently suppressed by congestion and high auto travel times? Will space freed up on the highways soon disappear as other commuters find the highways more attractive? Will some of these commuters be former public transportation users? What is MTA's responsibility in addressing increases in VMT that may occur as a result of the project-led decrease? (Schank 8)

**Response:** The ridership forecasting process used in the EIS employs a mode-choice model that determines the number of trips that would be made by auto, transit, and other modes in the future analysis years of 2010 and 2020 throughout the region. The future travel demand is based on population and employment growth projections expected by the two analysis years, as determined by the NYMTC. Within the total projected travel demand, the model accounts for "pent-up" demand for specific elements of the transportation network. For example, although the East Side Access Project would result in a reduction in the number of peak period vehicle trips, the number of trips made across the Queensboro Bridge is projected to remain steady. Some of the drivers who currently cross the Queensboro Bridge in automobiles during the peak hour would switch to the new East Side Access LIRR service, but other drivers who currently use other river crossings that have tolls would then switch to the Queensboro Bridge, where no toll is charged. However, the model does not increase the total travel demand (i.e., the total number of trips made) in the region during the peak period as a result of any induced or "pent-up" demand that may be unleashed because of unused highway capacity. It is not expected that the project-related reduction in vehicle trips would be large enough to result in any perceptible change in available highway capacity. The forecasts show that approximately 14,200 auto users (equivalent to 12,100 vehicles) would shift to the LIRR each day as a result of the new East Side Access service. In comparison, the model includes a total of 9.2 million daily trips on Long Island, with 1.6 million trips to Manhattan. Given the very small change in available capacity that would result from the project, it is

unlikely that the number of peak period auto trips would increase over that currently forecast by the model. If any auto trips were induced, they would most likely be trips that shifted from the “shoulder” periods into the peak hour, but the total number of daily trips would remain as predicted and the savings in vehicle miles traveled predicted for the project would still be realized.

#### *OTHER ASPECTS*

**Comment 109:** Express bus service should be offered between Jamaica and Manhattan, through the Midtown Tunnel, until East Side Access can be completed. (Azumah 5)

**Response:** The DEIS includes an analysis of increased bus and ferry service between Queens and Manhattan as part of its TSM Alternative. However, new bus service would be of limited benefit, due to substantial existing congestion on the roadways from Queens to Manhattan.

#### **AIR QUALITY**

**Comment 110:** The DEIS presents a microscale carbon monoxide analysis for the year 2010 at 10 receptor sites chosen across the study area using the New York City Environmental Quality Review and New York State Environmental Review Procedures guidance. In addition to receptors chosen via those methodologies, the analysis should model the receptors that were modeled in the New York CO Attainment Demonstration SIP. Moreover, since it is typical for motor vehicle-related emissions to increase in the outyears because of increases in vehicles miles traveled, the year 2020 should also be analyzed to be consistent with long range planning practices. (Hargrove 5)

**Response:** As described in the DEIS, the air quality analysis locations were chosen using CEQR and SEQR methodologies, which are based on EPA guidance for CO intersection modeling, based on locations where the proposed project has the potential to result in significant impacts. Since the proposed project would result in an overall decrease in vehicular activity in the study area, the analysis locations were specifically chosen (using the criteria mentioned above in the comment, which are the criteria used in New York City and New York State for analyses of environmental impacts) to examine very localized potential impacts. Those locations are at Long Island stations where increased ridership would result in additional vehicle trips and at key intersections around GCT where increased taxi activity (as well as increased pedestrian frictions) would occur. As described in the DEIS (see page 10-8), analysis locations were selected based on a combination of worst-case existing traffic conditions, largest overall volumes, and most project-generated trips. An analysis of the locations in the New York CO Attainment Demonstration is not necessary, since the project would not result in any significant increase in vehicle activity at those locations and therefore would not increase pollutant levels at

those sites. Attainment Demonstration sites in Manhattan consist largely of sites that would not be affected at all by the project, such as along Route 9A on the Hudson River, at Lincoln Center, on the Lower East Side on Delancey Street, at Columbus Circle, and at Tenth Avenue and 57th Street. The Attainment Demonstration also includes sites that would be affected by the project, but the project's effect would be to decrease CO concentrations at those sites because of its reduction in auto trips to Midtown Manhattan (as described in the DEIS, the project would reduce the number of auto trips to Midtown by approximately 6,000 in the peak period). These sites include Second Avenue and 36th Street, which is used by traffic traveling to and from the Queens-Midtown Tunnel, Third Avenue and 57th Street (affected by traffic from the Queensboro Bridge), and Herald Square, which is affected by Penn Station traffic. Also, as described in the DEIS in Chapter 9, "Transportation," section C ("GCT Area"), the project would also result in traffic benefits in the Times Square area, where two Attainment Demonstration analysis sites are located.

It should be noted that the DEIS analysis concluded that only one of the 10 locations where detailed air quality analyses were conducted would have a significant air quality impact that would require mitigation. That location is at Madison Avenue and 48th Street, where the project would create two new entrances to Grand Central Terminal. These results confirm that the project's adverse air quality effects are very localized and related to the actual access points of the project.

As discussed on page 10-12 of the DEIS, 2010 was selected as the critical analysis year for the microscale analysis. The choice of the project's estimated time of completion (ETC) for the microscale air quality analysis is not unusual for an EIS in the New York metropolitan area. This is due to the effect of vehicle turnover (i.e., newer, less polluting vehicles replacing older ones with higher emissions) on pollutant emissions even with the expected increase in VMT. As discussed on page 9C-19 of the EIS, due to high levels of existing congestion in the study area and limited portal capacity, peak hour traffic growth in Midtown is expected to average only 0.25 percent per year from 2010 to 2020, for a total of 2.5 percent. In contrast, based on EPA's MOBILE5B emission factor model, idle emission factors (the most significant contributor to intersection concentrations) from light-duty gas vehicles are expected to decrease by 6 to 7 percent from 2010 to 2020. Therefore, CO concentrations in the Midtown area are expected to decrease slightly between 2010 and 2020, even assuming continued growth in VMT.

**Comment 111:** The increase in Midtown Manhattan air pollution levels should be considered in connection the East Side Access and should be included in this DEIS. (Epstein 6)

**Response:** The DEIS includes a detailed analysis of the East Side Access Project's impacts on air pollutant levels both in Midtown Manhattan as well as at other locations in Chapter 10, "Air Quality." As described there, with implementation

of traffic mitigation measures, the Preferred Alternative would not result in significant adverse impacts in terms of localized air quality. Overall, the project would result in reductions in air pollutant burdens in the New York region, including Midtown Manhattan.

**Comment 112:** The DEIS projects an improvement in air quality in the New York region due to new LIRR customers who formerly drove. Is this based on the assumption that East Side Access would reduce VMT for the region (see comment above)? (Schank 9)

**Response:** As discussed on page 10-14 of the DEIS, the air quality analysis predicts a net decrease in air pollutants from a reduction in VMT due to the project. As discussed above in response to Comment 108, it is not expected that the reductions in VMT as a result of the project would be offset by any induced or “pent-up” auto demand.

**Comment 113:** Would the number of vehicle “cold starts” increase or decrease with East Side Access? Cold starts are a more serious contributor to poor air quality than VMT. Since most LIRR commuters drive to their boarding station, and there will be more LIRR riders after East Side Access is complete, does this mean that “cold starts” will increase? (Schank 10)

**Response:** While it is true that “cold-start” vehicles (i.e., the first 505 seconds after vehicle start-up) emit pollutants at a much higher rate than “hot-stabilized” vehicles, the effects of the cold-start portion diminishes as the length of the trip increases. In any event, the number of “cold-start” operations with or without the project would be essentially the same. With East Side Access in place, the same number of trips would be made from Long Island and eastern Queens to western Queens and Manhattan, but more of these trips would be made by train rather than by automobile. Thus, more people would be driving to LIRR stations than making the longer trip to Manhattan. Nonetheless, essentially the same number of people would be starting their vehicles each morning and each evening.

The reduction in pollutant emissions predicted in the DEIS is a result of the reduction in the length of each trip and not any change in the number of start-up operations.

**Comment 114:** The statement “In terms of NYAR operations, only Blissville Yard would experience an increase in diesel locomotive operations” needs clarification. The DEIS should make clear the specific impact on air quality particularly at Fresh Pond Yard, which sits adjacent to Mafera Park, and Highbridge Yard, which is located across the Harlem River from Highbridge Park and near Macombs Dam Park. (Laird 3)

**Response:** As described in Chapter 10, “Air Quality,” Blissville Yard is the only location that could potentially see an increase in diesel locomotive operations because,

unlike Maspeth and Fresh Pond Yards, NYAR does not currently use Blissville Yard for freight operations. Currently, both Maspeth and Fresh Pond Yards are used by NYAR as storage and trans-loading sites. By relocating NYAR maintenance operations from Yard A to Fresh Pond Yard, the project would not result in increased diesel locomotive operations at Fresh Pond Yard. NYAR currently moves trains from Fresh Pond and Maspeth Yards to Yard A for maintenance. The project would allow NYAR to consolidate storage and maintenance of trains at Fresh Pond and Maspeth, eliminating the need to move trains to Yard A, but not increasing train movements to and through Fresh Pond and Maspeth Yards. Consequently, there would be no change in air quality at Mafera Park.

As stated on page 10-17 of the FEIS, at Highbridge, the project would provide for the storage of electric and dual-mode (electric-diesel) equipment only. The dual-mode trains would be operated in electric mode at Highbridge. Since electric trainsets do not emit pollutants, air pollutant levels would not be changed by the project at Highbridge Yard. Consequently, there would be no effect in the air quality at Highbridge Park or Macombs Dam Park.

## CONTAMINATED MATERIALS

**Comment 115:** The DEIS underestimates the potential impacts to groundwater and soils at Sunnyside Yard from project dewatering activities and omits a reasonable alternative that would avoid most of these impacts. Amtrak's remediation of the yard cannot be expected to be complete before work commences on the East Side Access Project in 2001, and even with the safeguards indicated in the DEIS for construction of the TBM launch site, the real risk remains that the PCB-contaminated plume would be affected. Any movement of the plume, either vertically or horizontally, is unacceptable. Further, note that a portion of the plume and an area of soil contamination is located under and around the proposed new track on LIRR property that will be used to access Yard A. Failure to remedy this area of contamination now to the satisfaction of the New York State Department of Environmental Conservation (NYSDEC) could require later action and interfere with later operations. A reasonable alternative to the very real possibility of moving the plume is available to East Side Access Project sponsors: remediation of the free-floating product before the East Side Access Project begins. (Ernst 5A)

**Response:** The East Side Access Project recognizes its responsibility not to interfere with future or ongoing remediation at Sunnyside Yard or to exacerbate conditions by causing movement of the contaminated plume. As described in the EIS, the project work in Queens has been specifically designed so as to avoid movement of the groundwater in the area, and the East Side Access engineers are confident in the proven effectiveness of the techniques to be used. As described in the EIS, the East Side Access excavation site in Yard A would not be actively "dewatered." Excavation for East Side Access tunnel structures and the TBM launch shaft would take place within sealed cofferdams (referred to throughout the DEIS as the "bathtub"). Incidental ingress of

groundwater would be collected and continuously recharged to ensure that drawdown of groundwater in the immediate vicinity of the excavation would be held within the limits of normal seasonal variation. Far field effects on groundwater (e.g., the effects in the vicinity of the plume cited in the comment) are calculated to be negligible. As the project design progresses, East Side Access engineers will continue to study conditions at Sunnyside Yard and work with Amtrak and NYSDEC to explore other technologies to ensure that the groundwater and contaminated plume do not move during construction for East Side Access.

**Comment 116:** With respect to Sunnyside Yard/Yard A, this area has been designated as a Class 2 inactive hazardous waste site by NYSDEC, and Amtrak and NYSDEC are cleaning up the site. We want to encourage FTA's and MTA's commitment to avoid and minimize any interference or obstruction with that clean up effort, and would like to suggest that FTA and MTA examine opportunities to enhance and expedite the clean up efforts at these locations. (Hargrove 7)

**Response:** The DEIS describes that Sunnyside Yard is a designated Class 2 Inactive Hazardous Waste Disposal Site and that the project sponsors are aware of the responsibility not to prevent or significantly interfere with any proposed, ongoing, or completed remediation program in Sunnyside Yard. See also the response to Comment 115. Please note that currently no clean up agreement exists between NYSDEC and Amtrak; the agreement is to investigate conditions at the site.

**Comment 117:** Please note that in addition to dewatering for the TBM launch site, the TBM will tunnel through areas where the groundwater is contaminated with chlorinated solvents. Dewatering in connection with those activities, and the possibility of incurring and disposing of such contaminated groundwater, should also be addressed in the DEIS. (Ernst 5B)

**Response:** As described in the DEIS (see Chapter 17, "Construction and Construction Impacts"), the project would have an on-site slurry plant, where the slurry used by the TBM could be recycled for reuse. This plant would have a water treatment facility that could treat any contaminated groundwater encountered, so that the groundwater could be disposed of in the sewer system. As described on pages 17-55 and 17-56 of the DEIS, site-specific CCMPs would be prepared for all project areas. The CCMPs would provide details on the extent of pre-discharge treatment, if necessary, of groundwater encountered during tunneling. As described above in response to Comment 115, the project would not require active dewatering.

**Comment 118:** Another related concern is that project dewatering activities could cause off-site groundwater, which is more heavily contaminated with chlorinated solvents, to flow on-site. This should be discussed. (Ernst 5C)

**Response:** As described above in response to Comment 115, the project would not require active dewatering in Yard A and is being designed to avoid moving groundwater at Sunnyside Yard. No active dewatering activities are proposed. Only incidental leakage of groundwater into the sealed cofferdam would occur, and continuous recharging would eliminate effects on groundwater movements. Far-field effects on groundwater are calculated to be negligible.

**Comment 119:** The DEIS does not discuss the need for appropriate handling of sewer lines relocation at Sunnyside Yard in order to avoid potential adverse impacts. Some of the sewer lines at Sunnyside Yard have been identified as containing PCBs and require investigation and cleanup. Any relocation of lines must take into consideration the need for proper handling and disposal of such lines and must be coordinated with Amtrak. (Ernst 6)

**Response:** As described in the DEIS (see Chapter 13, "Utilities"), as the project design progresses, a detailed utility relocation report will be prepared that sets forth the specific utilities to be relocated and the means for performing that relocation. Any contaminated materials affected by project construction, including those within utilities to be relocated, would be addressed in accordance with applicable regulations.

**Comment 120:** Please note a number of factual corrections in the Contaminated Materials chapter in the discussion of existing conditions at Sunnyside Yard. On page 14-7, we note that the plume of PCB-contaminated oil contains approximately 75,000, not 200,000, gallons of product. Also, there are no "transformer yard areas" at Sunnyside Yard; the transformers on site are dispersed. On page 14-8, another NYSDEC Class 2 Inactive Hazardous Waste Site is located to the north of Sunnyside Yard and is a source of chlorinated solvent-contaminated groundwater. (Ernst 7)

**Response:** The size of the PCB-contaminated plume has been corrected in the FEIS. The text has also been corrected to indicate that there are transformers in the yard (but not transformer areas). The presence of another NYSDEC Class 2 Inactive Hazardous Waste Site has been specifically noted in the text as well.

**Comment 121:** The DEIS should also make clear that all construction activities in the yard, including those involving construction of replacement buildings for Amtrak sites requiring demolition for the project, must be addressed with NYSDEC pursuant to the 1989 Order on Consent. (Ernst 8)

**Response:** The FEIS is revised to clarify that all construction activities in Sunnyside Yard must be addressed with NYSDEC pursuant to the Order on Consent. Please note that demolition of Amtrak buildings is no longer required by East Side Access (this is described in more detail in the response to Comments 151 and 152).



**Comment 122:** The DEIS should note that all soil disposal from Sunnyside Yard must be coordinated with Amtrak. There are restrictions on where material generated from Amtrak property can be shipped, and all soil from soil excavations must be sampled, properly classified, documented, and properly disposed of. This activity must be coordinated with Amtrak, which must concur on the final destination of such soils. (Ernst 9)

**Response:** The FEIS is revised to clarify that all soil disposal from Sunnyside Yard must be coordinated with Amtrak.

**Comment 123:** While the DEIS briefly discusses what may be done at Sunnyside Yard/Yard A with any contaminated materials, it does not provide any information regarding where the material will be disposed once it is either treated on-site or not. The DEIS also states that groundwater that is encountered in construction will be sampled and analyzed; however, the document does not discuss how groundwater will be treated and disposed. We recommend that the FEIS describe the procedures that FTA would follow in order to meet the requirements of the Resource Conservation and Recovery Act (RCRA), such as 1) MTA or their contractor would become a hazardous waste generator upon extraction of any contaminated soils; 2) a generator identification number must be obtained in order to transport hazardous materials; 3) more specificity regarding on-site treatment of contaminated groundwater and soils; and 4) the procedures that will be used to comply with the requirements for handling and disposing of hazardous waste. (Hargrove 8)

**Response:** As described in Chapter 14, “Contaminated Materials,” of the DEIS and summarized in Chapter 17, “Construction and Construction Impacts,” site-specific Construction Contaminant Management Plans (CCMPs) would be developed for all project areas to provide guidance related to hazardous materials or chemicals that may be encountered in soil or groundwater. The CCMPs will describe the requirements for handling, management, treatment, and disposal of contaminated materials encountered during construction. As part of the CCMPs, the project’s construction activities would comply with manifest requirements under state and federal regulations. The specific details of these plans will be developed as the project design moves forward. Please note, however, that as noted in the DEIS, the subsurface investigations conducted for East Side Access indicate that the deep excavation proposed is less likely to encounter contaminated soil.

**Comment 124:** It is not clear whether the abandoned substation 1A at Sunnyside Yard requires demolition; if so, significant environmental issues involving asbestos and pigeon waste will be implicated. (Ernst 10)

**Response:** The abandoned substation 1A would not be demolished as part of East Side Access. Please note, however, that the DEIS does indicate (see page 14-21, as well as 14-24 through 14-26) that any asbestos or contaminated materials

encountered in structures to be demolished would be removed prior to demolition, according to all applicable state and local regulations.

**Comment 125:** The DEIS discusses maintenance and cleaning operations at Highbridge Yard and Yard A, for example. While we appreciate the efforts to control and convey the runoff of chemicals associated with these operations to specific sewer systems, we would also suggest that FTA and MTA examine options for pollution prevention pursuant to the Pollution Prevention Act of 1990 (PPA). We recommend that the FEIS discuss programs and practices that can be implemented at these facilities, such as recycling or reusing car cleaning chemicals, or treatment of maintenance materials before they enter the sewer system, that ensure that the project will comply with the PPA. (Hargrove 9)

**Response:** The maintenance and cleaning facilities developed for the East Side Access Project would be designed in accordance with the provisions of the PPA. The discussion of this issue is expanded in the FEIS (see Chapter 15).

**Comment 126:** The known contaminants of concern that could potentially be encountered during construction are PCBs, free petroleum and its volatile/semi-volatile organic compounds, chlorinated solvents, pesticides and metals. The investigations have covered past and current uses of the sites, visual inspection of all potential areas of contamination (such as USTs or ASTs, PCB containing transformers, storage areas, areas of illegal dumping, etc.). (de Quillfeldt 1)

**Response:** Comment noted. The EIS describes the contaminants of concern and investigations conducted for the project in Chapter 14.

**Comment 127:** Any environmental impacts present or inherent as a result of past site operations, but not caused by the construction, are not addressed by the DEIS. (de Quillfeldt 2)

**Response:** The purpose of this EIS is to assess potential impacts related to the construction and/or operation of the proposed East Side Access Project, and if necessary, present reasonable and feasible mitigation measures to eliminate or minimize any significant adverse impacts.

**Comment 128:** In Manhattan, GCT is in unfractured bedrock, so there would be little soil removal. Environmental impacts are unlikely. The project recognizes the possibility of encountering perched water tables at the soil bedrock interface that could require product recovery as a result of some past spills. (de Quillfeldt 3)

**Response:** Comment noted. This comment is essentially correct, especially for Option 2. However, under Option 1, the DEIS did disclose that some soil would be disturbed underneath the Metro-North tunnel.

**Comment 129:** The description of Amtrak Sunnyside Yard on page 14-2 as a Class 2 site is somewhat incorrect. A Class 2 designation applies to a site which poses significant threat to human health *and/or the environment and where action is required*. (de Quillfeldt 4)

**Response:** The additional text suggested has been added to the FEIS.

**Comment 130:** NYSDEC was not involved in the review of any investigation work plans for the Roosevelt Island location. (de Quillfeldt 5)

**Response:** Based on a preliminary site assessment performed for Roosevelt Island, it was determined that detailed subsurface investigations were not necessary.

**Comment 131:** The rationale for proposing New York City Sewer Ordinance Criteria for certain metals as threshold levels for groundwater is not clear. A Long Island Well permit would be required if construction would involve dewatering, and the permit conditions would specify the discharge criteria. All groundwater in New York State are classified GA, and Part 703 Class GA groundwater standards should be used at all sites, regardless of whether the groundwater is used for drinking or not. For soils, TAGM 4046 numbers should be used, except at sites where higher numbers are specifically approved with deed restrictions. (de Quillfeldt 6)

**Response:** Although all groundwater in New York State is classified GA, the East Side Access Project's only potential effect on groundwater is dewatering and the resulting discharge. It is anticipated that minimal dewatering may occur at one or more locations as part of the construction phase of the project. As described in the EIS, the construction techniques developed for the project in Queens would minimize the amount of dewatering required there. The project's "bathtub" would be constructed with a slurry wall, to minimize the dewatering required, and pumps would be installed to remove any water that leaks into the bathtub. As noted in the comment, anywhere in the four counties of Long Island, a well permit would be required with specific permit conditions determined as part of the permit process. No discharges to groundwater are anticipated; rather discharges would be to existing sewers or adjacent surface water bodies. In Queens, disposal would most likely be to the existing sewer system and the New York City sewer ordinance levels would apply (potentially with other requirements for other contaminants of concern). Similarly, the New York City sewer ordinance levels would apply at Highbridge Yard in the Bronx, unless the discharge was to surface water. In that case, a SPDES permit would likely be required, with limits set equal to (or some multiple of) the applicable surface water standards. Therefore, in the DEIS comparisons were made of existing contaminant concentrations in groundwater to both New York City sewer ordinance levels and surface water quality standards of the closest surface water body.

TAGM 4046 is a guidance document with soil guidance values developed based on scenarios that do not and will not occur at the project sites (e.g.,

residential use and potable groundwater). As such, comparison to these levels would merely indicate the sites are likely unsuitable for such purposes. Consistent with the approach currently being taken by NYSDEC at Sunnyside Yard, comparisons were made to soil screening levels more appropriate for the project sites' current and future use and restrictions.

**Comment 132:** The TAGM 4046 number of 50 ppm for individual SVOC in soil applies unless a lower number is specified. The Department does not recognize filtered samples, and only the unfiltered samples should be compared to the appropriate standard. (de Quillfeldt 7)

**Response:** As noted in the response to Comment 131, TAGM 4046 is a guidance document with values developed based on scenarios that do not and will not occur at the project sites. The value of 50 ppm for individual SVOCs was used only as a comparison to indicate potentially significant levels of contamination. The comparison to the individual TAGM 4046 SVOC levels would merely indicate most site soils are unsuitable as surface soils at residential sites. With respect to filtered samples, filtered samples were used to provide an indication of water quality with mitigation in place, since the project would be using settling basins before discharging any groundwater encountered during tunnel construction into the sewer system. The majority of surface water standards for metals require filtered samples to determine compliance. For this reason both results of filtered and unfiltered metals samples were presented to indicate the likelihood of compliance with the NYC Sewer Ordinance (unfiltered) and NYSDEC saline surface water standards/guidance values (filtered). Additionally, the results of filtered metals samples in groundwater are useful in determining the extent to which the metals are actually dissolved rather than indicative of suspended particulates which can be a result of the well conditions (especially in shallow wells installed in fill).

**Comment 133:** Except for the cut and cover portion west of Park Avenue, all proposed construction in the Manhattan alignment is in deep bedrock. As a result, construction-related environmental impacts from potentially contaminated soil and groundwater, if any, are expected to be minimal. (de Quillfeldt 8)

**Response:** Comment noted. This is especially true for Option 2.

**Comment 134:** The construction of tunnels through Sunnyside Yard may cause the contaminants to dislodge, and the free petroleum plume or the dissolved chlorinated solvents plume and/or the BTEX plume to expand and/or migrate off-site. The construction-related impacts of these plumes and other contaminants have not been fully evaluated, and NYSDEC at this time cannot make an unequivocal statement that the proposed construction would not cause adverse environmental impacts. Because Sunnyside Yard is a Class 2 site, the project sponsors would need to closely coordinate the construction with Amtrak, the owners and operators of Sunnyside Yard. It may be possible to partially or

fully remediate the yard prior to proceeding with project construction. (de Quillfeldt 9)

**Response:** The EIS does disclose the potential problems and issues associated with construction of the project through Sunnyside Yard, a Class 2 site. As noted in response to Comment 115, the East Side Access Project recognizes its responsibility not to interfere with future or ongoing remediation at Sunnyside Yard or to exacerbate conditions by causing movement of the contaminated plume. To the extent possible at this stage of the design, possible mitigation measures have been proposed to prevent movement of the floating plume, including the use of a low-permeability slurry wall to minimize any dewatering required. However, as the project proceeds into preliminary engineering and final design, the designers will continue to conduct subsurface investigations in an effort to refine the analysis of plume migration as well as the assessment of candidate measures to prevent any adverse impacts. The project team and its engineers will continue to work with NYSDEC and Amtrak on measures to avoid adverse impacts.

**Comment 135:** As stated previously, all groundwater in New York State is considered Class GA regardless of its use or salinity concentrations. NYSDEC questions reference to Class SD criteria in Table 14-3, Project Evaluation Criteria. (de Quillfeldt 10)

**Response:** As outlined in response to Comment 131 above, the comparison of existing groundwater levels to surface water standards was made since it is possible that dewatered groundwater may be discharged to surface water. A SPDES permit would presumably be required for this discharge with limits set equal to (or some multiple of) the applicable surface water standards.

**Comment 136:** It may be possible to justify the same clean-up standards at Yard A as established for Sunnyside Yard, with the same or similar deed restrictions. (de Quillfeldt 11)

**Response:** The approach may well be appropriate for the areas affected by project-related construction activities in Yard A and will be discussed with NYSDEC during future meetings on project construction.

## COASTAL ZONE MANAGEMENT

**Comment 137:** The FEIS should establish, to the satisfaction of the New York State Department of State, Division of Coastal Resources, and the NYC Local Waterfront Revitalization Program, that the project will not adversely affect the coastal zone of the State or the City. This analysis should be made while examining the project's effects on the State's coastal policies as set forth in the State's Coastal Management Program (CMP) and the City's coastal policies as contained in its Local Waterfront Revitalization Program (LWRP). That analysis

should be set forth in the FEIS, preferably in a separate section of the document. As a State agency, the MTA/LIRR is required to see to it that the project is carried out in consonance with the State's CMP and the City's LWRP and the policies as set forth in their respective documents. (Buerle 1)

**Response:** The DEIS and FEIS include a separate analysis of the project's effects on the coastal zone and consistency with the coastal policies. Please see Chapter 16, "Coastal Zone Management."

## CONSTRUCTION AND CONSTRUCTION IMPACTS

### GENERAL

**Comment 138:** The impacts of this project during construction would be relatively small, as most of the work would occur underground with little activity on the surface. Using General Contractor Association contractors would assuage safety concerns about construction of the project. (Elmer 4)

**Response:** Comment noted. Impacts associated with construction of the Preferred Alternative are discussed in detail in Chapter 17 of the EIS.

**Comment 139:** Direct and indirect employment from construction of the project would result in thousands of jobs for construction workers in the area, three out of four of whom reside in New York City, and build middle-class neighborhoods throughout the city. (Elmer 5)

**Response:** Comment noted. Direct and indirect employment from construction of the Preferred Alternative of East Side Access is discussed on pages 17-25 and 17-26 of the DEIS.

**Comment 140:** The Department of Buildings has a memorandum of understanding (MOU) with Metro-North regarding the operation of cranes and derricks. The Department would request that a similar MOU be executed with the LIRR prior to any work being performed. (Visconti 3)

**Response:** The East Side Access Project will look into Metro-North's arrangement with the Department of Buildings and work with the Department of Buildings on an acceptable agreement regarding the operation of cranes and derricks for the project. However, unlike Metro-North, LIRR personnel are not expected to operate cranes or derricks during the East Side Access Project construction. All cranes and derricks would be operated by contractors, who would be expected to adhere to all applicable city regulations in relation to the use of cranes and derricks.

**Comment 141:** The DEIS discloses that the excavated material from the drilling of the 13 miles of tunnels through Queens and Manhattan will be brought up in

Queens, where it will be removed via rail and truck. We recommend that the FEIS further explore the options for beneficial reuse of this material, especially for the considerable volume of material that is generated in Build Option 2. (Hargrove 6)

**Response:** The DEIS includes a discussion of some potential sites where the excavated material could be reused (see pages 17-17, 17-18, and 17-19). As noted in the DEIS, some of the materials would be used as backfill at Yard A and other project construction areas. The DEIS also states that some fill could also be used for embankments to be constructed as part of the Harold Interlocking improvements. Finally, the DEIS states, “While there are a number of potential destinations for this material, specific locations cannot be determined at this time, due to a number of factors.” Principally, those factors include the fact that the specific sequence, duration, and timing of construction, and the specific construction methodologies to be used are not yet finalized, so it is difficult to know what reuse sites might be available at the same time. For example, the DEIS notes that other large construction projects, such as landfills and large-scale waterfront projects, might require fill materials from East Side Access.

**Comment 142:** Although the DEIS explains that most construction activities will generally be contained within the construction sites and/or underground, any possible construction impacts on open space (specifically Mafera Park at Fresh Pond Yard) should be disclosed in Chapter 17. (Laird 4)

**Response:** The discussion in the FEIS is revised to more clearly indicate that there project would not result in any significant adverse impacts on open spaces (including Mafera Park) during construction (see Chapter 17).

#### *IMPACTS ALONG MANHATTAN ALIGNMENT*

**Comment 143:** The impact of tunnel construction in the area from Second Avenue to Park Avenue, where tunnels run under a number of residences, has not been adequately discussed in the DEIS. (Gualtieri 2)

**Response:** The DEIS includes a detailed analysis of the project’s impacts during construction in Chapter 17, “Construction and Construction Impacts.” This discussion has been augmented in the FEIS to clarify that the tunnels in Manhattan from Second Avenue to Park Avenue would be within bedrock and that the amount of settlement of earth or structures above the tunnels is expected to be insignificant. Conceptual parametric studies of settlement potential conducted for structures overlying the multiple station caverns at GCT found them to be minimal, on the order of a few millimeters. Above the running tunnels, the amount of underground excavation is smaller and the excavations are much deeper. Therefore, the influence of these excavations on overlying structures would be minimal. Strict enforcement of the project construction specifications, together with regular settlement monitoring of the overlying

properties and streets would ensure that the construction impacts remain within predicted and permitted ranges. Threshold (trigger) limits would be established for any settlements recorded, so that mitigation measures can be instituted ahead of any potential damage to the overlying properties and utilities. In the case of tunnels in rock, this would be expected to be limited to additional rock support and rock injection grouting from within the tunnels themselves.

The EIS also includes a very detailed ground-borne noise and vibration study for the buildings above the tunnel, as discussed in the EIS in Chapter 11, "Noise and Vibration." That analysis concludes that no significant adverse noise or vibration impacts would occur to the buildings above the tunnel, with the inclusion of the mitigation measures planned as part of the project.

### *IMPACTS IN QUEENS*

**Comment 144:** Disposing of excavated tunnel material via truck through Queens streets is not an acceptable option due to the impacts. Rail should be the only option for removing excavated material from tunnel construction sites in Queens. Using trucks even as a back-up plan in case the rail option is not adopted is simply not acceptable. (Shulman 1, Nolan 1)

**Response:** While every effort would be made to remove excavated material via rail, removal of excavated material via truck must be kept open as an option, due to the potential contractual issues associated with using rail as the sole source of material removal.

**Comment 145:** Newcomers High School is immediately adjacent to the proposed work site for the project, and we are concerned about impacts during construction. Because all Queens high schools are currently overcrowded, Newcomers High School must remain functional during construction. Relocation is not an option. (Zedalis 1)

The DEIS's discussion of noise impacts to the Newcomers High School at 28-01 41st Avenue in Queens is inadequate. While the DEIS admits that the project may have significant adverse noise impacts on Newcomers School, we do not believe the proposed mitigation measures will meet the requirements of existing New York State statutes or the needs of the school. The DEIS states that LIRR would consult with school officials during final design to consider the need for sound insulating construction fencing. However, we do not believe the installation of sound insulating fencing will be a satisfactory solution to the problems of noise and dust that may occur. The proximity of the school to the construction site, along with the school's need to keep windows open during summer months, will make noise a significant problem at the school that are not sufficiently mitigated in the DEIS. We do not see how the proposed remediation will prevent this project from violating the requirements of the State Education Law, Section 155.5, Uniform Safety



Standards for School Construction and Maintenance Projects, which mandates that construction and maintenance operations not produce noise in excess of 60 dBA in the occupied spaces of school buildings. NYCT's 63rd Street Connector Project created several incidents in which excess dust penetrated the building and, during the project's early stages, created a great deal of noise that disrupted the learning environment in the school. (Zedalis 2)

We are also concerned about air quality and dust during construction. The DEIS treats the possibility of dust from the project as if it were not a substantial problem. However, the location and the need to keep windows open during warm weather leads us to believe that both dust and air quality would be significant problems at Newcomers High School. (Zedalis 5)

**Response:**

The construction work for the East Side Access Project would not require relocation of any school activities. As described in the EIS (see Chapter 17), dust and noise emissions from the construction activities would be strictly controlled through application of technical control measures, detailed construction planning, specification of site-specific emission limits and control requirements in project construction contracts, and stringent MTA inspection of contractor compliance. Dust and noise emissions would be controlled to well within established health and safety limits. Please note that the State Education Law, Section 155.5, Uniform Safety Standards for School Construction and Maintenance Projects, mandates that school construction and maintenance projects implement acoustical abatement measures when school construction operations produce noise in excess of 60 dBA. However, the East Side Access Project is not a school construction or maintenance project, and consequently this standard is not applicable.

Please note that the East Side Access work proposed is farther from the school than was the NYCT project. The nearest point of the tunnel construction work activity anticipated is approximately 300 feet away from the nearest point on the Newcomers High School buildings (see Figure 17-6 in the FEIS). There would be no tunneling activities west of the eastern curb line of 29th Street and 41st Avenue. In contrast, NYCT's 63rd Street Connector Project involved construction activities in close proximity to the school.

To address the Board of Education's concerns, however, additional quantified analysis of noise impacts during construction were performed for the FEIS. These analyses indicate that interior and exterior noise levels could increase by up to 10 dBA (constituting a doubling of loudness) due to project-related construction activities. While this increase would be temporary (the majority of work would occur over a 2½-year period, with minimal activity occurring on the site for another 2½ years), the magnitude of the increase could potentially affect the learning environment in the classrooms facing the staging area on 29th Street.

While a noise barrier would effectively mitigate the noise level increase for first-floor classrooms, it would be relatively ineffective for the upper floors of the school. As described in the FEIS (see Chapter 17), to minimize disruptions at Newcomers High School, MTA would work with representatives

from the school to develop a plan to mitigate the construction-related noise effects. Such a plan would include sound-insulating construction fencing and the installation of double-glazed windows or air conditioning units. MTA would continue to work with school representatives throughout the construction period to address problems if they arise.

**Comment 146:** The maintenance of the structural integrity of the Newcomers High School has not been adequately addressed, as tunneling work will occur almost directly under the building. The ongoing NYCT 63rd Street Connector Project has caused tremors in the building even though the project is not nearly as large. (Zedalis 3)

**Response:** The East Side Access Project would not require tunneling in the vicinity of Newcomers High School, since that part of the tunnel has already been completed. The project would require only a small length of new tunnel from the existing 63rd Street Tunnel bellmouth, which is close to Northern Boulevard, across Northern Boulevard and into the Sunnyside Yard complex. The school buildings lie entirely outside the zone of influence of the project tunnel construction work; therefore, there would be no threat to the structural integrity of the school buildings. The nearest point of the tunnel construction work activity anticipated is approximately 300 feet away from the nearest point on the Newcomers High School building. There would be no tunneling activities west of the eastern curb line of 29th Street and 41st Avenue. In contrast, NYCT's 63rd Street Connector Project involved construction activities in close proximity to the school. See also the response to Comment 145.

**Comment 147:** We are concerned about the potential health and safety of students traveling to and from school during the construction period. For NYCT's 63rd Street Connector work, for quite some time after construction began, the Transit Authority did not properly block off its construction site from the streets commonly used by students to gain access to the school and this posed a clear danger to the students. (Zedalis 4)

**Response:** The East Side Access Project construction site would be fully enclosed by fencing and/or barrier walls prior to commencement of work, to ensure public areas are protected. All vehicular traffic access to and from the site would be restricted to truck routes on Northern Avenue via secure entry/exit gates; no access would be permitted via 29th Street or 41st Avenue. Anticipated traffic volumes are described in the DEIS in Chapter 17, "Construction and Construction Impacts." As described in the DEIS, Maintenance and Protection of Traffic Plans and Site Safety Plans would be developed during the detailed design stage of the project, and all work would be carried out in conformance with these plans to ensure the safety of the public as well as project construction workers.

**Comment 148:** In summary, we believe that the project should not move forward without a firm commitment on the part of the MTA to do whatever is necessary to prevent a negative impact on the learning environment at Newcomers High School. We are more than willing to meet with representatives of the MTA to determine what must be done to ensure that the students at the school would not be adversely affected and that the project itself meets all the requirements of the State Education Law. We have been contacted by representatives of the MTA who have given us verbal assurances that they intend to do everything possible to work with us. However, the DEIS gives no such assurance. (Zedalis 6)

**Response:** MTA is committed to ensure that the East Side Access construction work would be designed and carried out without causing unacceptable adverse effects on the learning environment at Newcomers High School, and in compliance with federal and state regulations. MTA will continue to work with representatives of the school throughout the project. The EIS has been revised to elaborate on this topic (see also the response to Comment 145).

#### *IMPACTS AT SUNNYSIDE YARD*

**Comment 149:** To avoid significant impacts to Amtrak operations, additional mitigation measures during construction must be included. Even with the most advanced TBM methodology, given soil conditions at the yard, some soil settlement should be expected from tunneling activities. In addition, excavation on the north side of the yard appears to affect water table elevation and groundwater flow, which in turn can cause soil settlement. Any soil settlement at the yard, particularly beneath the body track, could cause serious and significant delays in train service. Tunnel construction needs additional review, testing and contingency plans. Some suggested mitigation measures include soil monitoring, providing a carrier (self-supporting) rail during all phases of construction affecting a yard lead or track, and underpinning tracks in the yard. (Ernst 11)

**Response:** During preparation of the DEIS, engineering studies were conducted of the potential for soil settlement. These studies (which are referenced as supporting documents in the DEIS) describe the measures to be taken so that minimal to no soil settlement would occur as a result of the project. First, the tunneling methodology selected was chosen to minimize the potential for soil settlement. In addition, settlement and groundwater levels would be intensively monitored throughout the construction period. Corrective measures would be maintained on standby for immediate implementation, as appropriate, if specified threshold levels are being approached or exceeded. Analyses do not show track bridging or installation of underpinning, which would itself disrupt Amtrak operations, to be necessary or justifiable; East Side Access will continue to coordinate closely with Amtrak to ensure construction operations would not impact Amtrak operations. An expanded discussion of this issue is included in the FEIS.

**Comment 150:** We understand that two out of four train lines will be taken out of service at Harold Interlocking, with only a single temporary western bypass route for both LIRR and Amtrak, which will result in a single track operation for Amtrak service to and from Boston. The temporary western route would be primarily for LIRR service, reducing by half the number of tracks available to Amtrak. This will cause delays and seriously compromise Amtrak's new high-speed train service, which will at least double the number of Amtrak trains between Boston and Washington, D.C., by 2010. This impact can be addressed through the construction of a temporary eastern bypass as well as a western bypass. (Ernst 12)

**Response:** The single-track Amtrak operation referred to in the comment would occur only during Harold Interlocking Construction Stage 3, which is scheduled to last for 12 months. The section of single-track would be between Gate and Harold Switch ZF2 (801 Switch of the current Harold Interlocking), a distance of about 1.5 miles. In 1995, the Penn Station Utilization and Capacity Study simulated a single-track operation between Gate and Harold and showed that it could support Amtrak's proposed 2012 Operating Plan, including Acela service. In the event of Amtrak equipment failure on the single-track section of line, a quick response should occur because of the close proximity of Sunnyside Yard.

**Comment 151:** The loss of body tracks 1 and 2, representing 40 percent of the storage area for the S&I Building, for the duration of the East Side Access construction will make it impossible to provide high speed service as currently scheduled. There is no indication in the DEIS whether body tracks 1 and 2 will be relocated or replaced prior to their removal from service. (Ernst 13)

Loss of outbound motor and north runner tracks at Sunnyside Yard during Stage 1 construction will impact Amtrak's and NJ Transit's access to the engine service area and loop track, and make it impossible to route trains efficiently through Sunnyside Yard, which in turn will cause delays to New York dispatchments and degrade Northeast Corridor service. The document should clarify that the temporary north runner and outbound motor tracks will be constructed prior to these tracks being removed from service. (Ernst 14)

**Response:** Since publication of the DEIS, the construction plan at Sunnyside has been modified to ameliorate impacts to Amtrak. The new plan, which is reflected in the FEIS, has relocated the TBM launch wall 150 feet north of the location described in the DEIS. In this revised plan, East Side Access would not affect body tracks 1 and 2 or outbound motor and north runner tracks at Sunnyside Yard during construction.

**Comment 152:** Amtrak has no current plans to rebuild Buildings 2, 3, and 4 in Sunnyside Yard; loss of these buildings must be replaced with other permanent facilities for Amtrak maintenance and yard personnel, and this replacement must be part of the costs of East Side Access. The DEIS incorrectly states that Amtrak

plans to demolish these building and construct a new facility for maintenance and yard personnel. While this was identified as a long-term planning possibility, it is not currently in Amtrak's budget or plans. Building new facilities and relocating Amtrak's workforce is not discussed or indicated anywhere on the construction schedule. Also, please note that while the DEIS reflects that Buildings 2, 3, and 4 are planned for demolition, all other documents submitted to Amtrak reflect the desired demolition of Buildings 3, 4, and 5. Please clarify. (Ernst 24)

The plans reflected in the DEIS are silent on the condition of the TBM launch site upon project completion and return of the site to Amtrak. If the launch site is on Amtrak property, the site should be returned with the capacity to support future tracks. Otherwise, NJ Transit will be unable to use the area, as planned, for its future growth. (Ernst 33)

**Response:** As described in response to Comment 151, the TBM launch site has been relocated since publication of the DEIS, so as to avoid adverse impacts to Amtrak's property. The new launch site is 150 feet north of Amtrak's property, within Yard A. Consequently, the East Side Access Project would not require demolition of these Amtrak buildings. The FEIS reflects this change.

**Comment 153:** Reversing the operations of Lines 1 and 2 during Stage 3 construction and the use of unidirectional equipment will cause serious operational difficulties and congestion in the yard and result in delays to Northeast Corridor train service. Congestion will result because eastward trains would operate Line 2 to Sunnyside to the Sub tracks, but these tracks are not long enough to hold multiple trains, so throughput to the yard will be affected, especially during the AM peak period. In addition, reversing the operations of Lines 1 and 2 will also impede train servicing and car washing for NJ Transit. Trains currently circulate via the loop track, where they are washed; the car wash on Loops 1 and 2 currently operates only in the eastward direction. If Lines 1 and 2 are reversed, the resulting impacts can only be avoided by reorienting Sunnyside Yard body track walkways, adding a 480V standby system, adding unidirectional capacity to the Sunnyside Yard car wash, and adding yard/relay crews for the increased train movements required. (Ernst 15)

**Response:** The reversing of operations referred to in the comment would occur only during Harold Interlocking Construction Stage 3, which is scheduled to last for 12 months. East Side Access would upgrade the switch at Sub 4 to 30 mph, which would mitigate potential delays into Sunnyside Yard during the AM peak period. The comment is correct in stating that PM peak period trains from Sunnyside Yard to Penn Station would operate via the loop tracks. East Side Access would modify or upgrade the existing car wash to support this operation. Additional functional requirements within Sunnyside Yard to support the reversing of operations will be studied during East Side Access design.

**Comment 154:** The methods in the DEIS discussed for controlling vibration are insufficient for protecting structures at Sunnyside Yard, many of which are over 90 years old and fragile. Without additional protection and monitoring, impacts from blasting and other activities is likely. In particular, buildings near the TBM launch site are in fragile condition. Other concerns are the underground utility tunnel perpendicular to the track structures, the tracks themselves, and, if not yet reconstructed, the Honeywell Street bridge. Amtrak notes that the blasting specifications for acceptable vibration levels are less restrictive than those used by Amtrak for work on or adjacent to Amtrak's property. For these reasons, we believe that the special mitigation measures to be used for historic resources and discussed in the DEIS at pp. 17-53 to 17-54 should be used for all structures affected by vibration from construction at the yard, and that Amtrak specifications for blasting should control. (Ernst 16)

**Response:** The FEIS is revised to indicate that the project would follow Amtrak specifications for blasting in or near the yard. Vibration levels would be monitored by the contractor at the foundation of nearby structures during all blasting activities. Measures to minimize vibration levels to adhere to applicable standards and Amtrak specifications would be implemented as necessary.

**Comment 155:** The roadway from 42nd Place to the new S&I Building appears to be cut off by the "open cut" operations on the north side of the yard. This would impede access to the building, which would affect the high speed program and, during New York City Department of Transportation (NYCDOT) construction of the Honeywell Street bridge, could mean no vehicular access to that part of the yard. The roadway from 42nd Place is the new accessway to the S&I Building, once it is in place, and is also the alternative for yard access during work on the Honeywell Street bridge. (Ernst 18)

**Response:** The FEIS is revised to indicate that East Side Access would maintain access at all times to this part of Sunnyside Yard. As described below in response to Comment 157, East Side Access construction work in Sunnyside and NYCDOT bridge reconstruction work would not occur concurrently, since NYCDOT anticipates completing the reconstruction work before East Side Access construction is scheduled to begin.

**Comment 156:** The use of a large area on the south side of Sunnyside Yard for a staging area would dislocate Amtrak's current Maintenance of Way base, where all track supplies and materials are stored for New York area track infrastructure. The DEIS provides insufficient information on construction staging locations to determine impacts to operations at Sunnyside Yard. Amtrak is concerned that such areas not impede access via the south side of the yard, which may become the primary access to the yard once excavation at Northern Boulevard begins. Staging areas in the yard have already been committed to the NYCDOT for its bridge reconstruction project, making space very tight. Moreover, the DEIS should clarify that any plan involving the use of Amtrak

property is subject to Amtrak review and the project sponsors reaching an agreement with Amtrak. (Ernst 19)

**Response:** The FEIS expands on the discussion of constructing staging areas and clarifies that any plan involving the use of Amtrak property is subject to Amtrak review (see Chapter 17). As described in response to Comments 155 and 157, East Side Access construction work in Sunnyside and NYCDOT bridge reconstruction work would not occur concurrently, since NYCDOT anticipates completing the reconstruction work before East Side Access construction is scheduled to begin. Please note that the East Side Access team has met with Amtrak regularly during the EIS process to present supporting information that is specifically of interest to Amtrak, and the team will continue to meet and coordinate with Amtrak throughout the project design process regarding this and other issues.

**Comment 157:** Although the need for coordination with NYCDOT is mentioned, the project construction staging plans and schedule do not appear to fully appreciate the effects of the NYCDOT bridge project for reconstruction of the Honeywell Street and Queens Boulevard bridges traversing the yard. The bridge project is a fully funded and scheduled project which Amtrak is committed to support with manpower and scheduling of yard activities; Amtrak does not have the staff to be able to support the East Side Access Project at the same time. (Ernst 20)

**Response:** The East Side Access team has met with representatives of NYCDOT to discuss the planned reconstruction of the Honeywell Street and Queens Boulevard bridges. At a meeting on May 25, 2000, NYCDOT indicated that the work at both bridges is scheduled to be completed by November 2002. As shown in the construction schedule provided in the DEIS in Figure 17-1, this work should not interfere in any way with the East Side Access construction work in Queens. Further, the DEIS notes (see page 17-42) that construction activities would be coordinated with NYCDOT's programs for rehabilitating these bridges.

**Comment 158:** Information is needed on how and where the tunnel drilling machinery will vent to the surface, and what constituents will be released into the air as a result of TBM operations. (Ernst 21)

**Response:** As described in the DEIS (see page 17-43, in the discussion of air quality during construction), the tunnel drilling machinery in Manhattan would be vented to the staging area at Northern Boulevard in Queens. The FEIS has been expanded to describe the ventilation required for the tunneling work below Sunnyside Yard as well. Specifically, temporary ventilation of the Queens tunnel work would be provided from Yard A at the TBM launch site, 150 feet east of Amtrak's property at Sunnyside Yard. At this location, fresh air would be pumped into the tunnels, which would cause air within the tunnels to be released at Yard A. The air coming from the tunnels would contain

the same constituents as the ambient air at Yard A. (Please note that the TBM would be powered by electricity supplied by Con Edison, so no exhaust from drilling machinery would be emitted.)

**Comment 159:** No analysis has been made of the traffic impacts—trains, trucks, or otherwise—within, around, and to Sunnyside Yard due to construction delivery and soil and debris removal activities associated with this major construction project. (Ernst 22)

**Response:** The DEIS includes an analysis of the train traffic impacts that could occur during construction in Sunnyside Yard on page 17-35. This text is revised in the FEIS to indicate that construction of the East Side Access Project would require approximately two 20-car freight trains per day that would pass through Yard A and use the Montauk Branch during off-peak hours. These trains would not travel through Amtrak's property at Sunnyside Yard.

The DEIS also includes an analysis of vehicular traffic impacts outside of Sunnyside Yard during construction (see page 17-41). Because of the concerns about air quality in the Queens Plaza area, much of the detailed construction traffic analysis performed for the DEIS was presented in detail in the discussion of air quality during construction (starting on page 17-45); this material has also been added to the discussion of traffic in the FEIS. The expanded discussion in the FEIS (see Chapter 17) also includes a description of the vehicular traffic expected within the Sunnyside rail complex during construction. Since the publication of the DEIS, construction impacts to Amtrak's storage tracks and facilities within Sunnyside Yard have been reduced as a result of design refinements to the project. These refinements shift the location of the launch shaft for the Queens TBM to be entirely within Yard A and outside of Sunnyside Yard. Work, staging, and laydown areas within Yard A would be accessed by vehicles via local streets, and not through Sunnyside Yard. Furthermore, the final Maintenance and Protection of Traffic Plan will be submitted to Amtrak for review.

**Comment 160:** As noted in the DEIS, residential uses exist approximately 70 feet from the proposed construction of Harold Interlocking. Amtrak urges the MTA/LIRR to commit to installing a noise barrier alongside the construction alignment during the period of intrusive, noise-intensive activity, such as pile driving. (Ernst 23)

**Response:** The DEIS includes an analysis of noise impacts during construction in Chapter 17 (see page 17-49). The method of installing piles would be determined as design progresses, and, if possible, piles would be installed using methods other than pile-driving, to minimize noise impacts to the adjacent community. The appropriateness and feasibility of installing temporary construction noise barriers would be determined at that time.



**Comment 161:** In addition to the utilities discussed at page 13-3 in the DEIS, a new water line will be installed as part of the NYCDOT Honeywell Street and Queens Boulevard bridge replacement project. This new line will need to be maintained and protected during construction. Also, a temporary water line should be installed prior to any demolition of the existing line. (Ernst 25)

**Response:** As discussed in the EIS in Chapter 13, "Utilities," and summarized in Chapter 17, a detailed study of utility replacement will be conducted as design from the project proceeds. All existing utilities within the construction area would be protected and maintained while new connections are made, and utilities that are to remain in place would be protected and maintained during construction.

**Comment 162:** Since loss of the 42-inch sewer line at the south side of the yard will cause the shutdown of Amtrak's vacuum sewer system for train maintenance (waste disposal), the new sewer line must be installed prior to tunneling operations in the yard. This is not indicated on the construction scheduling for the project in the DEIS. (Ernst 26)

**Response:** As described in Chapter 13 of the DEIS, all utilities that are to be replaced would be protected and maintained until new connections are made. The construction schedule in the DEIS (provided in Figure 17-1) is not intended to provide a detailed layout of all elements of construction; rather, it gives an overview of the main elements of construction. More detailed information pertinent to Amtrak will be provided to Amtrak for review when it is available.

**Comment 163:** There are already a significant number of Con Ed power outages in Sunnyside Yard, and any additional loss, which often accompanies major construction projects involving line relocation, would provide unacceptable shutdown in operations at the yard, affecting train movements in and out of Penn Station and Northeast Corridor service. It is not clear if any of the six additional substations planned by East Side Access will provide dedicated back-up electrical services for Sunnyside Yard. In addition, there are a number of existing Amtrak substations potentially impacted by the project. These include Station No. 44 (not shown on any DEIS drawings), which is within the Harold Interlocking area, and the static frequency converter substation, close to the loop track. (Ernst 27)

Additional information is needed on the location of the fourth loop track to assess if there will be impacts to Amtrak's frequency converter. Current plans do not locate Amtrak's new frequency converter in relation to the fourth loop track. (Ernst 29)

**Response:** The six substations planned by East Side Access would not provide back-up electrical services for Amtrak's operations at Sunnyside Yard. The East Side Access team is in discussions with Con Edison to ensure that power to the yard is not disrupted as a result of project construction. The project's

construction plan would minimize impacts to Amtrak's facilities, including substations and the static frequency converter substation.

**Comment 164:** A utility relocation plan for water, electrical, and sewer service should be provided to Amtrak for review. Without such a plan, it is not possible to determine at this time whether there will be any additional utility impacts from the project. (Ernst 28)

**Response:** As noted earlier, a detailed utility relocation plan will be submitted to Amtrak for review as project design advances. All existing utilities within the construction area would be protected and maintained while new connections are made, and utilities that are to remain in place would be protected and maintained during construction.

**Comment 165:** Without the proposed location of the new General Motors access bridge, traffic impacts from the bridge cannot be determined. (Ernst 31)

**Response:** The FEIS is revised to indicate that the relocated GM access bridge would be adjacent to the existing bridge, and traffic patterns would not change as a result of this relocation (see Chapter 17).

## SAFETY AND SECURITY

**Comment 166:** The project would have to be constructed in accordance with NFPA 130 fire safety codes, which would allay fears as to the safety of a station deep underground. (Olmstead 4)

**Response:** This statement is correct. As discussed on page 20-5 of the DEIS, all public areas in both Option 1 and Option 2 of the Preferred Alternative would be designed to comply with applicable NFPA 130 fire safety codes.

**Comment 167:** Constructing a terminal 12 stories below ground, as is the case for Option 2 of the Preferred Alternative, presents a dangerous fire safety and evacuation problem that has not been adequately addressed. (Adler 1, Schumacher 2)

**Response:** Planning for this project has taken into account the possibility of a fire condition in the new terminal or the new tunnels, and a System Safety and Reliability Assurance Program has been developed to help ensure that the design and operation of these facilities incorporate a reasonable degree of fire safety. The program includes provision of a safety management organization, identification and assessment of fire hazards, development of fire safety policies and design criteria, and a safety certification program to verify inclusion of fire safety features in the design, testing and operation of the project.

The project's design will meet the applicable standards of the National Fire Protection Association (NFPA), which are the federal design standards for

transportation projects. Among these is NFPA 130 which is specifically intended to provide fire safety in underground passenger rail systems. NFPA 130 addresses the issue of safe evacuation through a combination of emergency exits, smoke ventilation, effective and prompt action by emergency forces, and prompt detection and suppression of fires. Fire safety provisions for this project would be typical of those for new underground passenger rail systems throughout the United States.

**Comment 168:** The platform conditions at the 42nd Street/GCT subway station as a result of the East Side Access Project will cause a dangerous condition for subway riders. The overcrowding caused by the additional East Side Access passengers would also threaten the health and safety of passengers as more people cram into cars not made to accommodate those numbers. (Maloney 4, Shulman 2, Duane 2)

**Response:** The DEIS analyzes the East Side Access Project's effects on the different elements of the 42nd Street subway station at GCT in Chapter 9, section C. This analysis includes an evaluation of the effects on such station elements as stairs and platforms, as well as line-haul capacity. As shown in the DEIS (see page 9C-50), with the introduction of East Side Access passengers to the platforms at the subway station, the platforms would operate within NYCT's guidelines at all but one location. At that location, the platforms would operate at Level of Service C/D, just exceeding the NYCT guidelines. This would not threaten the health and safety of passengers. In terms of line-haul capacity, the Lexington Avenue subway trains would already be operating at capacity, and the introduction of new passengers would increase the amount of time passengers wait on the platform.

**Comment 169:** The Fire Department has reviewed the DEIS and will have no problem supporting the project with the manpower and equipment currently available to us. (Nigro 1)

**Response:** Comment noted.

**Comment 170:** Because of the size and nature of this project, it is imperative that this Fire Department be kept aware of proposed construction details so that we may comment on their impact on our operations. We are particularly interested in maintaining emergency vehicle and manpower access to all construction sites, tunnels and emergency exits. In addition, fire hydrants must be available in proximity to work sites and tunnel entrances. Before and during construction, we would require access to tunnels and work sites in order to conduct familiarization drills for local fire units. (Nigro 2)

**Response:** The project team would keep the Fire Department aware of construction details and would work with the department to ensure that fire hydrants are available in proximity to work sites and tunnel entrances. Prior to and during

construction, the project team would provide the Fire Department with access to tunnels and work sites to conduct any and all necessary familiarization drills for local fire units.

## PROCESS AND PUBLIC PARTICIPATION

**Comment 171:** Notice of this meeting was not published to the New York City public. There was no ad in the New York Times and no ads in the subway station or subway cars. (Pearlstein 1)

**Response:** Notice of the availability of the DEIS and the date of the public hearing was published in the Federal Register on May 26, 2000. The DEIS was circulated to involved and interested agencies and other interested parties, including elected officials and New York City community boards for areas affected by the project. In New York City, copies of the DEIS were provided to the City Council, the Departments of City Planning, Environmental Protection, Parks and Recreation, and Transportation, the Economic Development Corporation, Fire Department, and Landmarks Preservation Commission; as well as the Mayor, Comptroller, Public Advocate, and all five borough presidents. Copies were made available at numerous viewing locations in New York City, including the borough presidents' offices, numerous community board offices, and various public libraries throughout the city. Copies of the Executive Summary were also distributed to a wide range of interested parties, including those on the Citizens' Advisory Committee and others. These included Brooklyn Community Boards 2, 3, 5, 8, and 12; Manhattan Community Boards 4, 5, 6, 8, and 9; Queens Community Boards 1 through 14; as well as the Straphangers' Campaign and other public interest groups. In addition, postcards indicating that the DEIS was available and that the public hearing would be held were circulated to some 5,000 businesses and households along or within the vicinity of the proposed tunnels in Manhattan. To advertise the public hearing, MTA published notices of newspapers of general circulation as well as community and minority newspapers throughout the area. These included *Newsday*, *The Journal News*, *Connecticut Post*, *Yankee Trader*, *The Queens Chronicle*, *The Amsterdam News*, and *El Diario-La Prensa*. MTA also posted advertisements for the hearing in every MTA commuter railroad station and performed seat drops with notice of the hearing on both LIRR and Metro-North commuter trains.

**Comment 172:** On the title sheet should Bronx County be Brooklyn instead? (Chiang 1)

**Response:** The title sheet is correct. The title sheet lists the counties directly affected by the project, which are New York, Queens, Bronx, Nassau, and Suffolk Counties. Bronx County is the location of Highbridge Yard, where a new storage facility for Metro-North Railroad would be constructed as part of the project. The project would not involve any construction in Brooklyn.

**Comment 173:** Table of Contents, on page xix add a line “Appendices” after Index. (Chiang 2)

**Response:** This revision has been made in the FEIS.

**Comment 174:** The Department of State requests that MTA forward copies of the DEIS to the New York City Department of City Planning, Local Waterfront Revitalization Program, Waterfront and Open Space Division. The New York City Waterfront Revitalization Program is then requested to provide us with comments on the project, and we will inform MTA and FTA of our decision regarding consistency with the New York State Coastal Management Program. (Buerle 1)

**Response:** Copies of the DEIS were forwarded to the New York City Department of City Planning, Local Waterfront Revitalization Program, Waterfront and Open Space Division at the same time that copies were distributed to other involved and interested agencies and parties.

**Comment 175:** We look forward to having the MTA engage us in discussions on this and related projects. (Zupan 7)

**Response:** Comment noted. East Side Access has conducted an extensive outreach program, which would continue through project construction. As detailed in Chapter 23, “Process and Public Participation,” of the EIS, this outreach program includes use of a Technical Advisory Committee (TAC) and Citizens’ Advisory Committee (CAC). The Regional Plan Association is a member of the CAC.

## FINANCIAL CONSIDERATIONS

**Comment 176:** The funding for this project depends on its ability to go forward, those who seek to frustrate that process do so at the risk of losing financial support for this project. (Silverman 3)

**Response:** Comment noted.

**Comment 177:** The MTA has successfully passed the federal hurdle and the project now has a “recommended” status, making it eligible for New Starts money. The MTA is asking for approximately \$2.1 billion from federal sources (half the project’s total required funding). (Schreibman 4)

The State of New York stands squarely behind this and a number of other MTA expansion projects. The State Legislature and the Governor recently approved the MTA’s 2000-2004, five-year Capital Program, funding the local portion of the East Side Access Project and other transit needs throughout the MTA system. Over the past three years, the project has received some \$46

million in federal “New Start” earmarks. This year’s \$10 million appropriation secured in the House will help move the project forward toward initial construction late this fall. (Skelos 3)

**Response:** Comment noted.

**Comment 178:** More needs to be done at the federal level to support this project: the EIS should be finalized and granted a Full Funding Grant Agreement; the administration should provide more than a token amount of funding for the project in its FFY 2002 budget proposal; the project will require many multiples of the \$10 million the Administration recommended for it this past year. (Skelos 4)

**Response:** Comment noted.

**Comment 179:** The project is a vital component of the MTA’s latest Capital Program. (Angelakos 3)

**Response:** Comment noted.

**Comment 180:** There is no solid indication of where the \$4.3 billion will come from to construct the Preferred Alternative. (Schumacher 3, Pearlstein 2)

**Response:** Chapter 22 of the DEIS, “Financial Considerations,” provides a thorough description of the funding sources for the Preferred Alternative. In particular, see section D of that chapter, “Funding the Preferred Alternative.”

**Comment 181:** Since we are eager to see the project completed, we are also concerned about its long-term funding. The DEIS assumes that 50 percent of the funding would be from the federal government, but so far this money has not been appropriated. Funding for the project should be nailed down in advance to the extent politically possible so as to ensure project completion. (Schank 5, Angelakos 1)

**Response:** The Federal portion of funding for New Starts projects is usually appropriated over the years it takes to design and build a project, and the great bulk of the funding usually comes after all potential environmental impacts of the project are disclosed in an FEIS, and the FTA issues a Record of Decision.

**Comment 182:** Economic feasibility of the Preferred Alternative is open to debate and subject to political process and future economic conditions which cannot be determined. (Epstein 10)

**Response:** As noted in the DEIS (see Chapter 23, “Process and Public Participation”), the role of the DEIS is to provide a complete disclosure of the potential for

impacts on environmental conditions and to provide an opportunity for public involvement and review of the conclusions in light of relevant social and economic factors. Financial considerations relevant to the Preferred Alternative are described thoroughly in Chapter 22, "Financial Analysis"). MTA has allocated \$1.5 billion to the East Side Access Project in its current Capital Program and the FTA has given the project a "recommended" rating in its assessment of projects for purposes of receiving federal New Starts funding.

**Comment 183:** We are unsure of the MTA's commitment to a full-length Second Avenue subway, considering that East Side Access is to be completed in 2009 while there is no planned completion date for the subway, and that the MTA's capital program includes nearly half of the \$3.56 billion in basic construction cost for East Side Access, but only \$1.1 billion for a full-length Second Avenue subway, which is less than 7 percent of its total cost. (Russianoff 5, Zupan 1)

The MTA Capital Program, which devotes significantly more money to the construction of East Side Access than to the construction of the Second Avenue subway, disproportionately benefits suburban residents to the detriment of city residents. (Pearlstein 3, Gualtieri 1)

**Response:** The MTA's recently approved 2000-2004 Capital Program includes a total of \$1.5 billion for the East Side Access Project and \$1.05 billion for the Second Avenue subway. The funding for the Second Avenue subway will provide for environmental studies, design, and the initiation of construction by the end of 2004 for a subway to extend the entire length of Manhattan's East Side. No specific completion date for the Second Avenue subway is yet available, because the project is not yet as advanced in its planning and design. As noted above in response to Comment 10, the East Side Access Project would provide benefits to the entire region, not just to suburban commuters.

#### OTHER COMMENTS

**Comment 184:** We are concerned that the DEIS did not contain a cumulative impacts analysis for any of the alternatives. While the DEIS contained a section called "Secondary Impacts" this section did not provide a cumulative analysis listing projects and particular resources for analysis in the context of cumulative impacts. In accordance with NEPA and the Council on Environmental Quality (CEQ) implementing regulations, every DEIS must discuss the cumulative impacts of all past, present, and reasonably foreseeable actions on the resources of the human and natural environment. The FEIS must have a cumulative impact analysis as outlined in the CEQ guidance. (Hargrove 4)

**Response:** Following CEQ guidelines, an analysis of cumulative impacts considers resources, ecosystems, and human communities that could be potentially affected by the action and whether those could also be affected cumulatively by the action in combination with other reasonably foreseeable actions. To this end, the East Side Access DEIS considers as the future baseline condition the

combination of existing conditions together with known development plans, public policies, projected population and employment growth, and other general background growth. The TSM and Preferred Alternatives are then compared with this future baseline condition. Specifically, the consideration of project impacts in Chapters 3 through 18 of the DEIS include regional traffic and transportation plans and a number of major proposed future land use projects, as well as projected growth in population and employment throughout the region. Using this future baseline condition, the DEIS considers the cumulative effects of the East Side Access Project and other proposals on each of the specific resources that could be affected by the project. A summary of the cumulative effects of East Side Access together with other reasonably foreseeable future projects has been added to Chapter 19 in the FEIS.

**Comment 185:** The City of New York Department of Health has no comments on the DEIS. (Goldberg 1)

**Response:** Comment noted.

