Appendix O: Response to Comments Received on the 1999 DEIS

A. INTRODUCTION

This appendix summarizes and responds to all substantive comments on the Major Investment Study (MIS)/Draft Environmental Impact Statement (DEIS) published in 1999 for the Manhattan East Side Transit Alternatives (MESA) Study. Public review for the MESA MIS/DEIS began on August 20, 1999, with publication and distribution of the document. The Metropolitan Transportation Authority (MTA) held a public hearing on September 15, 1999, at 347 Madison Avenue, fifth-floor boardroom. The public comment period remained open until October 8, 1999. Substantive comments made on the Supplemental Draft Environmental Impact Statement (SDEIS) are summarized and responded to in Chapter 23 of this Final Environmental Impact Statement (FEIS). As is described in this appendix, many of the comments received on the MIS/DEIS were comments in favor of a full-length Second Avenue Subway, which was not analyzed in detail the 1999 document. The current FEIS analyzes the full-length subway alternative, which has been selected by MTA/NYCT as the preferred alternative, and consequently many of the comments made in 1999 have been addressed by the selection of this preferred alternative.

The MIS/DEIS was circulated to involved and interested agencies and other parties and posted on the MTA's website, and notice of its availability and the public hearing were published in the *Federal Register* on August 20, 1999. To advertise the public hearing, MTA published notices in general circulation newspapers as well as community and minority newspapers throughout the area, including *The New York Times*, *New York Observer*, *Midtown Resident*, *Upper East Side Resident*, *Downtown Resident*, *The Villager*, *Downtown Express*, *Our Town*, *Chelsea Clinton News*, *Westsider*, *Manhattan Spirit*, *Town and Village*, *Jewish Forward*, *Jewish Sentinel*, *The Chinese World Journal*, *Tribeca Tribune*, *The Amsterdam News*, and *El Diario-La Prensa*. In addition, information on the public hearing was posted on the MTA's website, a notice of public hearing was mailed to all public officials and interested parties in the MTA service area; and a press release announcing the hearing was sent to all media outlets in the area. Bilingual signs announcing the hearing were posted in all MTA New York City Transit (NYCT) subway stations and on all buses.

This appendix identifies the organizations and individuals who commented on the MIS/DEIS, then summarizes and responds to their comments. It considers comments made at the public hearing on September 15, 1999, and received during the comment period. Section B, below, lists all individuals and organizations who commented on the MIS/DEIS. Following each commenter's name is a list of the comments made, referenced by comment number. Section C contains a summary of all comments made and a response to each of those comments. These summaries convey the spirit of the comments made, but do not quote the comments verbatim.

The comments are organized by subject area, as follows:

- Subway Alternatives, including the following:
  - — MESA Subway Proposal vs. Full-Length Subway
  - — Specific Design Issues
  - — Other Subway Alternatives
- No Build Alternative
- Transportation Systems Management (TSM) Alternative, including the following:
  - — Bus Service
  - — Vehicular Traffic
  - — Subway Service Changes
- Light Rail Transit (part of Build Alternative 2)
- Evaluation Process for Alternatives
- Construction Methods, including the following:
  - — Phasing
  - — Construction Disruption
  - — Shaft Sites
- Air Quality
- Infrastructure and Energy
- Environmental Justice
- Indirect and Cumulative Impacts, including the following:
  - — LIRR East Side Access Project
  - — Other Projects
- Financial Analysis/Funding
- Process and Public Participation

Following each comment is a list in parentheses of people or organizations who made the comment. If multiple comments were made on the same subject, they are summarized into a single comment with all commenters listed afterward.

LIST OF GROUPS AND INDIVIDUALS WHO COMMENTED ON THE 1999 MIS/DEIS

RESOURCE AGENCIES

1. U.S. Environmental Protection Agency, Robert H. Hargrove, letter received October 29, 1999 (Comments 14, 65, 67, 80, 81, 82, 89).

ELECTED OFFICIALS

2. Honorable Martin Connor, New York State Senator, letter of September 29, 1999 (Comments 1, 2, 9, 29, 53, 65, 67, 89, 97).
3. Honorable Tom Duane, New York State Senator, comments made at public hearing (presented by Brad Usher), and written testimony submitted at public hearing (Comments 1, 2, 17, 28, 65, 89).
4. Honorable Fernando Ferrer, Bronx Borough President, comments made at public hearing (presented by Xavier Rodriquez), and letter of August 30, 1999 (Comments 1, 9, 25, 67).

5. Honorable Virginia C. Fields, Manhattan Borough President, comments made and written testimony submitted at public hearing; written comments of October 8, 1999 (Comments 1, 2, 13, 14, 15, 16, 17, 24, 25, 29, 33, 65, 67, 69, 78, 79, 85, 86, 89, 90, 97).
6. Honorable Kathryn Freed, Member of the New York City Council, comments made and written testimony submitted at public hearing; letters of August 23, 1999, and September 27, 1999 (Comments 1, 2, 9, 24, 28, 67, 89, 97).
7. Honorable Deborah Glick, Member of the New York State Assembly, comments made and written testimony submitted at public hearing (Comments 1, 2, 53, 65, 89, 97).
8. Honorable Roy Goodman, New York State Senator, comments made at public hearing (presented by Joseph Zedrosser) and written testimony submitted at public hearing (Comments 1, 67, 88, 89, 97).
9. Honorable Richard Gottfried, Member of the New York State Assembly, comments made and written testimony submitted at public hearing (Comments 1, 2, 67, 89, 97).
10. Honorable Alexander "Pete" Grannis, Member of the New York State Assembly, comments made and written testimony submitted at public hearing (Comments 1, 2, 89, 97).
11. Honorable Mark Green, Public Advocate for the City of New York, comments made and written testimony submitted at public hearing (Comments 1, 2, 9, 97).
12. Honorable Carolyn B. Maloney, U.S. representative, written testimony submitted for public hearing and letter of October 7, 1999 (Comments 2, 7, 9, 65, 67, 89, 90, 97).
13. Honorable A. Gifford Miller, Member of the New York City Council, comments made and written testimony submitted at public hearing (Comments 1, 2, 9, 15, 65, 67).
14. Honorable John Ravitz, Member of the New York State Assembly, comments made and written testimony submitted at public hearing (Comments 1, 2, 8, 89, 97).
15. Honorable Philip Reed, Member of the New York City Council, letter of August 23, 1999 (Comments 89, 97).
16. Honorable Steven Sanders, Member of the New York State Assembly, comments made at public hearing, presented by Bert Nusbacher (Comments 1, 2, 9, 70, 96, 97).
17. Honorable Sheldon Silver, Speaker of the New York State Assembly, comments made at public hearing (presented by Yvonne Morrow) and written testimony submitted at public hearing (Comments 1, 9, 28, 53, 65).
18. Honorable Scott Stringer, Member of the New York State Assembly, comments made at public hearing (presented by Susanna Friedman) and written testimony submitted at public hearing (Comments 1, 9, 12, 89).

COMMUNITY BOARDS

19. Community Board 1, resolution of September 1999, submitted by Anne Compoccia on September 23, 1999 (Comments 1, 89).
20. Community Board 6, William Oddo, Transportation Committee Chair, Community Board 6 Resolution of March 1999, submitted as written testimony for public hearing (Comments 1, 2, 67, 96).

21. Community Board 8, M. Barry Schneider comments made at public hearing; and Reba W. Williams, comments made at public hearing (presented by Andrea Polci) and written testimony submitted (Comments 1, 2, 9, 89, 97).
22. Community Board 11, Cora Shelton, Transportation Chair and Vice Chair of Board, comments made at public hearing (Comments 1, 83).

ORGANIZATIONS

23. Committee for Better Transit, Brendan Read, comments made at public hearing and written statement of September 15, 1999 (Comments 6, 62, 64, 87, 93).
24. CIVITAS, Gorman Reilly, comments made and written testimony submitted at public hearing, with additional copies of testimony submitted by Genie Rice, President, on September 17, 1999 (Comments 1, 3, 32, 33, 39, 53, 96).
25. East Sixties Neighborhood Association, Inc. (ESNA), letter of September 15, 1999, from Judith Schneider, President (Comments 1, 2, 89, 97).
26. Environmental Defense Fund, James Tripp, comments made at public hearing (Comments 1, 9, 38, 90).
27. Fordham-Bedford Community Coalition, John Rozankowski, Ph.D., comments made and written testimony submitted at public hearing (Comments 1, 6, 9, 26).
28. General Contractors Association of New York, Inc., Francis McArdle, comments made and written testimony submitted at public hearing (Comments 1, 2, 13, 14, 15, 17, 19, 20, 21, 22, 76, 89, 91, 96).
29. Institute for Rational Urban Mobility, George Haikalis, comments made and written testimony submitted at public hearing (Comments 2, 6, 46, 47, 58, 62, 63, 64, 66, 90).
30. MetroEast, Lou Sepersky, comments at made and written testimony submitted at public hearing (Comments 1, 2, 4, 5, 53, 55, 89, 92).
31. Natural Resources Defense Council, Richard Kassel, comments made and written testimony submitted at public hearing (Comment 83).
32. New York City Transit Riders Council, Andrew Albert, comments made at public hearing (Comments 1, 13, 28, 89).
33. Regional Plan Association, H. Claude Shostal, letter of October 8, 1999; Jeff Zupan, comments made and written testimony submitted at public hearing; and written submission of September 17, 1999 (Comments 4, 7, 9, 14, 15, 17, 18, 24, 51, 67, 68, 69, 74, 75, 77, 89, 90, 97, 100).
34. Straphangers Campaign, Gene Russianoff, comments made at public hearing (Comments 1, 2, 9, 89).

INDIVIDUALS

35. Approximately 24,300 residents and interested parties who submitted a form letter/postcard in support of the full-length Second Avenue Subway (Comment 1).
36. Barry Adler, comments made at public hearing (Comments 1, 9, 26, 90, 96, 97).

37. Ron Aryel, M.D., comments made at public hearing and letter of September 15, 1999 (Comments 1, 9, 37, 83, 89).
38. John Cornelius, comments made at public hearing (Comments 1, 96).
39. Sean Dancy, comments made at public hearing (Comments 1, 9, 43, 44).
40. Florence Daniels, comments made at public hearing (Comments 1, 2, 38, 40, 41, 65).
41. Jeffrey M. Duban, letter of September 17, 1999 (Comments 8, 10, 11, 23, 71, 73, 84, 89, 99).
42. Michael Felson, comments made at public hearing (Comments 1, 65).
43. Martin Gangursky, comments made at public hearing (Comments 1, 2, 50, 52).
44. Karen Hecht, letter of September 20, 1999 (Comment 52).
45. Larry Littlefield, comments made at public hearing (Comments 94, 95).
46. Eva Moskowitz, candidate for the New York City Council, comments made at public hearing (presented by Anessa Karney) and written testimony submitted at public hearing (Comments 1, 2, 89, 97).
47. John Mulligan, comments made at public hearing (Comments 1, 2, 9).
48. Robert Olmsted, comments made and written testimony submitted at public hearing (Comments 1, 2, 3, 6, 27, 28, 29, 30, 42, 45, 71, 89, 96, 97).
49. Daniel Pearlstein, comments made at public hearing (Comment 26).
50. Stella Pisentzner, comments made at public hearing (Comments 54, 56, 60).
51. Joan Schrift, letter of September 15, 1999 (Comments 36, 53, 57, 59, 61, 65).
52. Larry Smith, comments made at public hearing (Comments 1, 2, 54, 89).
53. Erik Strangeways, comments made at public hearing (Comments 1, 9, 26, 31, 34, 35, 38).
54. Norman Vincent, comments made at public hearing (Comment 48).
55. Dorothy Williams-Pereira, comments made at public hearing (Comments 1, 49, 98).

B. COMMENTS AND RESPONSES

SUBWAY ALTERNATIVES

MESA SUBWAY PROPOSAL VS. FULL-LENGTH SUBWAY

Comment 1: *The project sponsors received approximately 24,300 form letters/postcards from individuals and groups who support a full-length Second Avenue Subway. The complete text of the letter/postcard is as follows:*

Manhattan Borough President C. Virginia Fields says: "Vote for a full-length 2nd Avenue Subway!" Endorsed by *The New York Times*: "The [Metropolitan Transportation] Authority…should endorse the full Second Avenue line even if it still needs to find the funds…The real issue is long-term vision. [The MTA] needs to be more aggressive." … Build the Second Avenue Subway: New

York's Future Is Riding on It! I support building the full-length Second Avenue Subway. (_____*Name*, _____*Address*, _____*City/State/Zip*)

Following are other similar general comments received in support of the full-length subway from individuals who commented on the 1999 MIS/DEIS. In addition to these, City Councilmember A. Gifford Miller testified that nearly 800 constituents had contacted his office in support of the full-length Second Avenue Subway:

We support a full-length Second Avenue Subway. Progress should occur right away, and not be deferred. (*Adler, Albert, Aryel, Compoccia, Connor, Cornelius, Dancy, Duane, Felson, Ferrer, Fields, Freed, Glick, Goodman, Gottfried, Grannis, Green, McArdle, Miller, Moskowitz, Mulligan, Oddo (for CB 6), Olmsted, Ravitz, Reilly, Rozankowski, Schneider, Sanders, Sepersky, Shelton, Silver, Smith, Strangeways, Stringer, Tripp, Williams, Williams-Pereira, ESNA*)

The full-length Second Avenue Subway alternative is crucial for the economic well-being of the city and the region. The transportation system is inadequate to accommodate future economic and population growth, so not building the subway is more expensive to the city in terms of overall economic growth than building it. The new subway is critical to serve the neighborhoods once served by the Second and Third Avenue elevated lines, which were torn down and not replaced; development has occurred in these neighborhoods in anticipation of a new subway. (*Aryel, Connor, Cornelius, Daniels, Duane, Freed, Gangursky, Glick, Gottfried, Green, Grannis, McArdle, Miller, Moskowitz, Ravitz, Russianoff, Shelton, Silver, Stringer, Williams, CB 1, ESNA*)

Response: In response to comments made during public review of the DEIS and in consultation with public officials and the public outreach program, MTA/NYCT has selected a full-length subway as the preferred alternative. That option is evaluated in the FEIS.

Comment 2: *The following consolidated comments in support of the full-length subway, and opposed to MESA's Build Alternative 1, cite the full-length subway's general benefits compared with the MESA subway. Other commenters who wrote in favor of the full-length subway cite growth and development along the length of eastern Manhattan as the reasons for their support.*

The MESA subway would not increase access where most of the riders want or need to go, and would not serve those who live and work on the East Side south of 63rd Street or who have destinations south of 63rd Street. It would not shorten walking distances to the subway for many New Yorkers. The proposal would not relieve overcrowding on the Lexington Avenue Line nor provide adequate relief at Grand Central. It fails to meet the needs of the Lower East Side and East Village. (*Connor, Daniels, Duane, Fields, Glick, Gottfried, Grannis, Maloney, Olmsted, Sanders, Sepersky*)

Without the Second Avenue Subway, nearly two dozen East Side blocks will be frozen with rush hour gridlock by 2020. The city will choke on pollution and vehicular traffic. (*Freed, Haikalis, Ravitz, Russianoff, Williams*)

There is great need for the full-length subway, given the extent of the East Side transit jam. Many of the East Side subway stations are over capacity. Ridership on the Lexington Avenue Line has grown significantly since 1992, largely because of the implementation of the MetroCard. Ridership on Saturdays is more than weekday ridership used to be just a few years ago. The crowding on the Lexington Avenue Line is hazardous and risks injury to passengers. The new subway is needed to relieve overcrowding at all times, not just during rush hours. (*Connor, Duane, Freed, Gangursky, Glick, Green, Haikalis, Miller, McArdle, Moskowitz, Mulligan, Oddo, Ravitz, Russianoff, Sanders, Smith, Williams, ESNA*)

Response: In response to comments made during public review of the DEIS and in consultation with public officials and the public outreach program, MTA/NYCT has selected a full-length subway as the preferred alternative. That option is evaluated in the FEIS.

Comment 3: The MESA subway would begin to relieve the overburdened Lexington Avenue subway. It would provide new access to rapid transit for the large number of residents of the Upper East Side east of Third Avenue. The connection to the Broadway Line does bring benefits to residents of the Upper East Side and East Harlem, such as convenient access to West Side destinations. (*Olmsted, Reilly*)

Response: Comment noted. As described in the FEIS, riders on the proposed Second Avenue Subway would still have the option of through service to the Broadway Line.

Comment 4: The MESA report fails to take advantage of the portion of earlier plans that would have been of benefit to Queens. Those plans proposed use of the 63rd Street Tunnel for trains that would turn down Second Avenue, giving Queens riders access to the East Side and relieving much of the crowding at the transfers to the Lexington Avenue Line at 59th and 51st Streets. The MESA subway would not make maximum use of the 63rd Street Tunnel, because there would be no place for the maximum number of trains from Queens through the tunnel to go. This would waste a sizable portion of the public funds spent 20 years ago on the tunnel. (*Sepersky, RPA*)

Response: The full-length Second Avenue Subway analyzed in the FEIS includes a connection from the line to Queens. In the near term, this connection would be used for non-passenger service diversions and reroutes due to disruptions. If the capacity of the Queens subway network is increased in the future, or if existing service is reconfigured, this connection, along with available track capacity on the planned Second Avenue Line south of 63rd Street, would enable additional subway service between Queens, Midtown, and the Financial District to be provided.

Comment 5: MESA would not make service expansion possible in Brooklyn, as would a full-length subway with a Water Street route. It also would not allow full expansion

of subway service in the Bronx, as would be possible with a full-length Second Avenue Subway. (*Sepersky*)

Response: As noted above, in response to comments made during public review of the DEIS and in consultation with public officials and the public outreach program, MTA/NYCT has selected a full-length subway, which is being designed so as not to preclude future expansion to the Bronx and Brooklyn.

Comment 6: MESA fills up the Broadway BMT and depends on the Manhattan Bridge being open. What happens if an inspector finds a crack in a beam of the bridge and orders the bridge closed without warning? Possible solutions include a double crossover to the express tracks south of 14th Street, to allow express trains to turn back before the bridge. (*Olmsted*)

The MESA line depends on the southern half of the Manhattan Bridge being open, but some engineers say this bridge will be permanently closed to subway traffic. The line south of the bridge to Whitehall Street can't support the ⓃⓇ and MESA trains. Turning the train at 14th Street is not an answer; Canal Street flip flops are a waste of public money. (*Rozankowski*)

The Canal Flip would disrupt through local service and cause unnecessary hassles to thousands of Queens and Brooklyn commuters. (*Olmsted, Read*)

The Canal Flip (proposed under MESA's Build Alternative 1) ignores another study, the East River Crossings Study, which recommended a Rutgers-DeKalb connection in Brooklyn that might reduce usage on the Manhattan Bridge. (*Haikalis*)

Response: The Canal Flip is no longer part of the proposed project, since full-length service is now proposed on the Second Avenue route. Second Avenue Subway trains operating on the Broadway Line express tracks would cross the Manhattan Bridge to Brooklyn. The Manhattan Bridge is undergoing extensive rehabilitation, so that NYCT can reopen full subway service across it. The current project includes provisions to turn back Broadway Line trains at 14th Street in the event of a future closure of the southern half of the Manhattan Bridge.

Comment 7: Recently, MTA has characterized MESA's 125th Street to 63rd Street segment as a first phase of a larger project, but MTA does not appear to have a more comprehensive plan for transit expansion. What is missing is a statement of what those subsequent phases are, their relationship to this project, the impact of this project on them and vice versa, and the extent to which decisions made on this project preclude subsequent phases. The resulting segmentation of this environmental analysis makes it impossible to accurately assess the environmental consequences of this project. (*Maloney, Zupan, RPA*)

Response: As noted above, in response to comments made during public review of the DEIS and in consultation with public officials and the public outreach program, MTA/NYCT has selected a full-length subway as the preferred alternative. That

option is evaluated in the FEIS. The Second Avenue Subway project is part of MTA's long-range planning framework for access to and through Manhattan.

Comment 8: We are opposed to the ill-conceived, unaffordable, and likely unbuildable Second Avenue Subway, whether stub or full-length. (*Duban*)

Response: Comment noted.

Comment 9: The DEIS should have included the MetroLink proposal for a full-length Second Avenue Subway connecting to Brooklyn, Queens, and Co-Op City in the Bronx. A comprehensive plan is required to meet the city's transit needs. The FEIS should include the imaginative suggestions of the Regional Plan Association, such as adding 18 miles of tunnels and extending service from the Bronx to Atlantic Avenue. MetroLink would address rapid transit problems of the south-central Bronx that suffered loss of transit service when the Third Avenue el was demolished and Metro-North service was discontinued at many stops. (*Adler, Aryel, Connor, Dancy, Ferrer, Freed, Green, Miller, Mulligan, Ravitz, Rozankowski, Russianoff, Sanders, Silver, Strangeways, Stringer, Tripp, Williams Zupan*)

While our other comments requested that the MetroLink proposal be included in the FEIS, we now request that an SDEIS of the full-build Second Avenue Subway, as set forth in the MetroLink proposal, be prepared to analyze the full-length subway. While purporting to look at alternatives, the DEIS dismisses any full-length Second Avenue Subway, such as RPA's MetroLink. The DEIS does not indicate that RPA's MetroLink plan is proposed, nor that Governor Pataki directed the MTA to study the MetroLink proposal 9 months ago. (*Maloney, RPA*)

Response: Much of the MetroLink proposal is beyond the scope of the current study's goals and objectives, which are aimed at improvements on Manhattan's East Side. The full-length Second Avenue Subway will not preclude MetroLink concepts in the Bronx, Queens, or Brooklyn.

Comment 10: The argument that a new line is needed to attract jobs to Manhattan is questionable, since the number of jobs worth having in New York City has declined since mid-century. The fiction that everyone needs travel to or work in Manhattan should be abandoned. (*Duban*)

Response: Comment noted.

Comment 11: If the East Side was zoned for as-of-right high-rise construction in anticipation of a Second Avenue Subway, and the subway has not been built after 25 years, then the zoning should be changed to reflect that reality, thereby beginning to curb runaway population and reducing the need for the new subway. The belief that Manhattan can and should accommodate unlimited population growth and daily commuters is perverse. (*Duban*)

Response: The Second Avenue Subway is needed to provide adequate transit access for existing development on the East Side.

Comment 12: Construction of the new subway will provide thousands of new construction jobs. (*Stringer*)

Response: Comment noted.

Comment 13: The MTA's ridership projections in the DEIS appear to be grossly understated. Ridership on the Lexington Avenue line in Manhattan increased substantially between 1997 and 1999. The ridership numbers on the Lexington Avenue Line that this study projects for the year 2020 were already exceeded last year. This calls into question the validity of the other predictions made by the MESA modeling. Using the increased ridership as the baseline and recalculating the projected ridership using the same assumptions as in MESA, the overcrowding on the Lexington Avenue Line reaches dangerous proportions. This will be worse with East Side Access in place. The FEIS should use up-to-date ridership numbers. (*Albert, Fields, McArdle*)

Response: See Chapter 5, "Transportation," for a discussion of the ridership demand modeling and analysis of the full-length Second Avenue Subway done for the FEIS.

Comment 14: The DEIS has ample evidence to support a full-length subway, but it reaches a different conclusion. It demonstrates that a high percentage of the trips on the Lexington Avenue subway in the peak period are between the origins and destinations of Brooklyn/the Bronx and East Midtown, East Midtown and Lower Manhattan, and the Upper East Side and East Midtown. However, the DEIS falls short in demonstrating how well the alternatives that are proposed serve those trips. Ridership figures in the report show 5 of the top 10 morning trips and 8 of the top 10 evening trips begin or end in East Midtown, but that neighborhood would not be served by the MESA subway proposal. While the system may be able to have more trains, these are trains that do not bring trips into either of the high-volume origin-destination points.

The DEIS seems to suggest that placing more trains on the Broadway Line increases the number of express trains possible on the Lexington Avenue Line, even though the number of Lexington Avenue local trains passing through in an hour decreases. However, the DEIS does not disclose how it arrives at that conclusion. Therefore, we question how well these alternatives meet the purpose and need for the project, because it appears that the number of transfers to either build alternative does not increase and that these alternatives add more trains rather than attempting to effectively serve the demand for the trips to those locations. (*Fields, EPA*)

The DEIS assumes an increase in the number of Lexington Avenue Line trains at Grand Central/42nd Street station. We don't understand how this is possible given the current configuration. The DEIS states that signal improvements can't be used to increase the dwell times of trains in the station, and that signal

improvements would be made over the long term, and not within the study's time frame. The assumptions on train throughput are in error and must be corrected. (*Fields, McArdle, RPA*)

Response: See Chapter 5, "Transportation," for a discussion of the ridership demand modeling and analysis of the full-length Second Avenue Subway done for the FEIS.

Comment 15: The MESA stub would serve only 5 of the top 20 origin-destination markets using the Lexington Avenue Line, would attract few new transit riders to the transit system (only 0.13 percent), and would take only 200 autos and 88 taxis off the road in the peak hour. With few riders new to the transit system, a key goal of the MESA Study was not achieved. Further, the cost of the MESA proposal was not adequately evaluated in a cost-benefit ratio for the small number of new riders (213 riders shifted from cars and 88 from taxis). (*Ferrer, Fields, McArdle, Miller, Zupan, RPA*)

Response: See Chapter 5, "Transportation," for a discussion of the ridership demand modeling and analysis of the full-length Second Avenue Subway done for the FEIS.

Comment 16: In the DEIS, Table 9D-21 shows 19 southbound Lexington Avenue Line trains over capacity at Union Square under the No Build and TSM Alternatives, but only five under Build Alternative 1 or 2. Where have the riders gone? (*Fields*)

Response: See Chapter 5, "Transportation," for a discussion of the ridership demand modeling and analysis of the full-length Second Avenue Subway done for the FEIS.

Comment 17: The stub subway would divert only one-third of the volume of riders to be added to the Lexington Avenue Line over the next 20 years from expected ridership growth. The MESA subway would result in a reduction of fewer riders on the Lexington Avenue Line during rush hours than will be added by ridership growth between now and 2020. That means that even with the MESA stub, the Lexington Avenue Line would be more crowded than it is today, not even factoring in the effect of the LIRR East Side Access Project. (*Duane, Fields, McArdle, Zupan, RPA*)

Response: See Chapter 5, "Transportation," for a discussion of the ridership demand modeling and analysis of the full-length Second Avenue Subway done for the FEIS.

Comment 18: The MESA subway would also not relieve overcrowding during subway transferring. (*RPA*)

Response: As noted throughout the FEIS, the MESA subway proposal is no longer under consideration. The FEIS analyzes a full-length Second Avenue Subway with a Broadway Line service component as well.

Comment 19: There have been large ridership increases at key (N)(R) stations in recent years, as new jobs and housing in these areas have led to overcrowding on this line as well. From 1997-1999, there were substantial increases at Fifth Avenue, 23rd Street, and Prince Street, for example. How will this system absorb the proposed new service as well as the planned 63rd Street connector operation? (McArdle)

Response: Capacity remains on the Broadway Line express tracks for additional service. The proposed Broadway Line component of the full-length Second Avenue Subway analyzed in the FEIS would not interfere with other operations on that line. For more information, please see Chapter 5 of the FEIS.

Comment 20: The 1999 DEIS is missing certain basic origin and destination and journey-to-work information for people who live on the Upper East Side and in East Harlem, in particular people who live east of Third Avenue, including Lexington Avenue Line riders. This includes the number of people who are driving their own automobiles or traveling by taxi. This analysis should include examination of trip logs of cabs, to see what kind of trips are made to and from this area. It would also be helpful to know how many current Lexington Line passengers live east of Third Avenue, as well as how many of those people travel to work in West Midtown or south of 14th Street. (*McArdle*)

Response: The DEIS and its supporting documents included information on the origin and destination and journey-to-work patterns of the residents and employees of the study area. Updated information, using current ridership and census information, is included in the FEIS in Chapter 5 and was incorporated into its ridership modeling.

Comment 21: We would like to see more information on the travel patterns of people who live in the station growth areas, such as Bleecker, Prince, and 23rd Streets. (*McArdle*)

Response: Information on the general travel patterns of residents and employees in the study area is included in Chapter 5B of the FEIS.

Comment 22: We think that with the addition in Times Square of more office buildings, there will be more traffic generated along the Shuttle (S) and into Grand Central. (*McArdle*)

Response: The current land use patterns and predicted future patterns for development and resulting population, labor force, and employment have been incorporated into the project's ridership model. For residents of the Bronx, Harlem, and the Upper East Side, the Broadway Line service component of the full-length Second Avenue Subway, described in Chapter 5B of the FEIS, would provide direct service to Times Square.

Comment 23: Most misleading of all is the idea that a Second Avenue Subway is needed to alleviate congestion on the Lexington Avenue subway. The best way to alleviate

congestion, and which could obviate the need for a Second Avenue Subway, is to hike rush-hour subway fares. (*Duban*)

Response: A significant increase in rush hour subway fares specifically as a disincentive to customers would be counter to the purpose of a mass transportation system, which seeks to provide convenient service to customers in the area to allow the city to function efficiently, to allow residential neighborhoods to survive separate from commercial areas, and to encourage people not to use private vehicles and taxis as their mode of travel.

Comment 24: While most of the trips made on the Lexington Avenue Line in the morning and evening peak periods originate or terminate in Brooklyn, Queens, or the Bronx, those areas are not included in the study area. The study area must include all the catchment areas served by the Lexington Avenue subway line. (*Fields, Freed, RPA*)

Response: The size of the primary study area reflects the purpose of the MESA Study, which was very clearly stated from the start of the project. The purpose of the study was to address the problems and deficiencies associated with continuing growth on Manhattan's East Side served by an inadequate transportation infrastructure. The impact of residents of Queens, Brooklyn, and the Bronx on the transportation infrastructure of Manhattan's East Side was a major consideration of the study. (See also the response to Comment 68, below.)

Comment 25: The DEIS ridership analysis is problematic because it defines origin and destination as the area where the rider enters the subway system, so that areas without subway service are not included as origins or destinations. This means that ridership from those locations is underestimated. (*Fields*)

Response: This comment does not account for the complex ridership model used for the project, which takes into account actual census data for every census tract in New York City. Therefore, rather than tracking riders' movements between stations, the model accounts for movements between census tracts, which are the actual locations of passengers' origins and destinations. Thus, the model is a reasonable representation of actual ridership.

SPECIFIC DESIGN ISSUES

Comment 26: The proposed two-track, local-only design is problematic. Few people in the Bronx want to crawl through local stops to get to their destination. Further, a two-track line doesn't allow for bypass facilities. This means you cannot extend the Second Avenue Subway later without forming a bottleneck every time there is a sick passenger or door trouble. Thus, a two-track line limits expansion to the Bronx later. (*Adler, Pearlstein, Rozankowski, Strangeways*)

Response: The MESA subway and the proposed full-length Second Avenue Subway both anticipate a two-track system. Compared with a four-track line, two-track system greatly reduces the cost of the system as well as the disruption associated with construction. Stations are placed approximately 10 blocks apart, seeking a

balance between service speed and proximity for customer access. Crossovers, connections with other lines, as well as some short sections of three-track configuration would be placed along the line in an effort to ensure recovery from unplanned delays. In addition, there would be four tracks between 21st and 9th Streets to be used for train storage, but which could also be used for diversions when necessary. The Second Avenue Subway alignment analyzed in the FEIS does not preclude an extension to the Bronx in the future.

Comment 27: The concept of linking the Second Avenue Subway to Lexington Avenue at 125th Street is a good idea and establishes a good transfer for the 4 5 6 lines serving the Bronx. (*Olmsted*)

Response: Comment noted. For further discussion, see Chapter 5. This concept has been further improved in the current Second Avenue Subway project.

Comment 28: We support a full-length Second Avenue Subway with a spur on the Lower East Side. The needs of the Lower East Side, where residents are the least-served by transit in Manhattan, must also be addressed. One option is a subway, for example, a branch of the 14th Street crosstown subway (L) along Avenue C, Pitt Street, East Broadway, Park Row and Chambers Street. (*Albert, Duane, Freed, Olmsted, Silver*)

Response: The full-length Second Avenue Subway does provide service to some portions of the Lower East Side. An additional spur service on the Lower East Side would reduce mainline Second Avenue Subway service to Lower Manhattan, making the subway less competitive with the Lexington Avenue Line and therefore less able to reduce crowding on the Lexington Avenue Line. Other service options for the Lower East Side, such as those suggested in the comment, are not included but are also not precluded from being implemented in the future.

Comment 29: The Second Avenue Subway needs a good connection to Grand Central. (*Connor, Fields, Olmsted*)

Response: Comment noted. The engineering work associated with the full-length Second Avenue Subway includes examination of the possibility of a transfer connection from the new subway's 42nd Street Station to the 7 service at 42nd Street, allowing customers a free transfer to the subway at Grand Central. A rail connection to Grand Central was investigated as part of the Lower Manhattan Access Study and was not found to provide a significant benefit, as it was a less direct route to Lower Manhattan than the Lexington Avenue Line. The Second Avenue Subway would provide a convenient transfer for Metro-North riders at 125th Street.

Comment 30: Some connections would be valuable, such as at Grand Street Station, where Brooklyn riders would get a direct ride to East Midtown via Second Avenue. There are also needs to serve Queens and extend to the Bronx via a good route, such as proposed in RPA's MetroLink plan. (*Olmsted*)

Response: A transfer at Grand Street is proposed as part of the full-length Second Avenue Subway. For information about this and other transfers, please see Chapter 2 of the FEIS ("Project Alternatives"). The system is being designed so as not to preclude future extensions to the Bronx and Brooklyn and includes a connection to Queens.

Comment 31: Every time the new subway crosses another subway, we should have a connection. (*Strangeways*)

Response: For the new Second Avenue Subway analyzed in the FEIS, transfers would be provided at locations where an existing line's station, the tunnel alignment, and track profile permit it; where projected ridership warrants it; and where the costs are manageable. For more information on transfers, see Chapter 2.

Comment 32: Planning for the new service must precede construction, so that future links and connections are anticipated and the need to go back and lay additional tracks or widen tunnels later is avoided. (*Reilly*)

Response: Engineering work for the proposed Second Avenue Subway is currently under way. This design work anticipates future connections, so they will not be precluded by the project's design. As noted above, the project alignment has been designed to not preclude future connections to the Bronx and Brooklyn at the north and south ends of the route, and to Queens via the 63rd Street Line if additional capacity is built in Queens in the future.

Comment 33: A new 116th Street Station would provide needed access for that main commercial street of East Harlem as well as improved access to rapid transit for large segments of the population east of Third Avenue and north of 96th Street. (*Fields*, *Reilly*)

Response: In response to numerous public comments in support of a 116th Street Station, this station was evaluated and is now included in the preferred alternative.

Comment 34: It may be possible for the Second Avenue Subway to link with the Ⓝ train to Brooklyn. (*Strangeways*)

Response: The comment is correct. As described in Chapter 2, the project includes a full-length Second Avenue Subway and a Broadway Line component. The Broadway Line service would run on the express tracks of that line, and transfers would be available at all express stations to the local service. The Broadway Line component of the new Second Avenue Line service would cross the Manhattan Bridge and continue on to Brooklyn.

Comment 35: We should have a connection at Atlantic Avenue that incorporates that in the subway system. If a new tunnel is constructed under Atlantic Avenue, they should try to retain the historic Atlantic Avenue tunnel. (*Strangeways*)

Response: This project proposes a full-length subway under Second Avenue in Manhattan. No work is proposed as part of this project in Brooklyn, as that does not meet

the goals and objectives of this project. However, the proposed project would not preclude such an extension in the future. Broadway Line service will go into Brooklyn via the Manhattan Bridge.

Comment 36: For the subway alternative, you state that stairs and elevators will be provided from the street to the mezzanine. Does this mean that there will be no use of escalators? (*Schrift*)

Response: With the proposed Second Avenue Subway analyzed in this FEIS, each station in the new system would have stairs and elevators (as required by the Americans with Disabilities Act [ADA]) and escalators as appropriate and feasible.

Comment 37: I support a new subway, because modern construction allows for the increase in accessibility to handicapped people to the transit system. (*Aryel*)

Response: Comment noted. As described in Chapter 2, the new system would be ADA-compliant and accessible to the disabled.

Comment 38: The subway as proposed places the stations too far apart—the stations are about 15 blocks apart. You claim they're only 10 blocks apart because each station is three blocks long, but they're still too far apart. (*Daniels, Strangeways, Tripp*)

Response: As noted earlier (and described in Chapter 2), station spacing has been developed to achieve a balance between maximum operating speed of the system and convenient access for passengers. Placing the stations closer than 10 blocks apart would mean that the trains would operate at a slow speed and customers traveling the length of the route would have a more time-consuming commute. In this case, many customers would choose to continue to use the faster Lexington Avenue express service. As noted in the comment, however, station platforms would be two to three blocks long, and most stations would have multiple entrances. In some locations, those entrances would be on the opposite ends of the station, so that they could be as much as three blocks apart, and in some cases, only eight blocks from the nearest station to the north or south.

Comment 39: The gap between the 86th Street and 72nd Street Stations is too large. Residents in the high 70's will still be closer to the Lexington Avenue Line. (*Reilly*)

Response: As noted earlier (and described in Chapter 2), station spacing has been developed to achieve a balance between maximum operating speed of the system and convenient access for passengers. On the Upper East Side, station spacing is partly determined by the complexities of the alignment near the connections to the 63rd Street Tunnel, which dictate the location of the 72nd Street Station. Adding another station between the 86th and 72nd Street Stations would slow the service and make it less appealing for those already on the train. However, as discussed in Chapter 2 of the FEIS, the 86th Street Station would likely have an entrance at 83rd Street. Please note that in many locations, residents may still elect to use the Lexington Avenue Line. The goal of the full-length Second Avenue Subway is not to eliminate the need for the Lexington

Avenue Line, but rather to supplement that service with another equally attractive option. As described in Chapter 5, the ridership model predicts that the Second Avenue Subway would result in a reduction of approximately 43 percent in the number of riders who would use the 77th Street Station on the Lexington Avenue Line during the peak hour.

Comment 40: The subway stations proposed are not positioned at crosstown streets. (*Daniels*)

Response: As described in Chapter 2, at least one entrance at each station would be located at a major crosstown street.

Comment 41: The DEIS does not clarify if the M15 bus would be taken away to provide the new subway. (*Daniels*)

Response: The M15 bus would not be taken away to provide the new subway. Generally, bus service meets a somewhat different need than subways, with buses typically serving customers with shorter trips. However, some portion of bus trips may be diverted to the new subway. As part of NYCT's routine service monitoring effort, bus service frequency is periodically adjusted to any changes in demand in conformance with bus loading guidelines.

Comment 42: A short connection with the Chrystie Street tracks north of Grand Street Station could give some Brooklyn trains a short cut to East Midtown over the Manhattan Bridge, and a connection with the Rutgers Street Tunnel (Ⓕ line) would give Brooklyn IND riders (ⒶⒸⒻ lines) direct access to East Midtown. At Delancey Street, connection can be made with the underutilized Nassau Street subway for service to Lower Manhattan and continuing to Brooklyn. (*Olmsted*)

Response: The proposed full-length Second Avenue Subway would include service via the Broadway Line across the Manhattan Bridge as well as north-south service along Second Avenue. Brooklyn Ⓕ riders would be able to transfer at Houston Street (the Second Avenue Station on the Ⓕ) and Brooklyn ⒷⒹ riders would be able to transfer at Grand Street to the Second Avenue Line. Additionally, a new passenger transfer at the Broadway-Lafayette Street-Bleecker Street Station (the construction contract is expected to start in 2004) would help provide a more direct route to the East Side of Manhattan from Brooklyn. A track connection with the Chrystie Street tracks appeared feasible with the Shallow Chrystie Option described in Appendix B. However, as a result of information gained through the SDEIS analyses, this option is no longer under consideration because of the severe adverse impacts that would result during its construction. A track connection would not be feasible with the Deep Chrystie Option, which is the selected alignment for this area, due to its depth. A connection to the Nassau Street Line was evaluated but proved to be less beneficial than the Water Street alignment (see Appendix B).

Comment 43: Because we have current ⒷⒹⓆ service on Chrystie Street south of Houston Street, south of 23rd Street the trains should be rerouted along First Avenue if

possible, with additional routes on Water Street, Nassau Street, and an Independent line branching out to Brooklyn via Pike Street and linking to the Fulton Street Line in Brooklyn. Plus, we can create an Independent line to Kings Plaza via Park, Stuyvesant, and Utica Avenues. (*Darcy*)

Response: An alternative with new subway service on First Avenue was studied as part of the Lower Manhattan Access Study described in Appendix B. That alternative was found to attract fewer riders and reduce crowding on the Lexington Avenue Line less than a Second Avenue alignment. The FEIS evaluates a Water Street alignment. A Nassau Street alignment was considered but found to be less beneficial, as described in Appendix B. The scope of this project does not extend to the other boroughs, as the project's goals and objectives relate to improvements to transit service on Manhattan's East Side.

Comment 44: We don't have many transfer points on the far East Side. The only stop on the East Side above Houston Street is First Avenue on the L train. The MTA should construct stops and underpasses on the East Side using existing subway lines like the E and F train and the Q train on 63rd Street. This could make the Second Avenue Subway line more acceptable. (*Darcy*)

Response: Transfers would be provided at all locations where the station placement, tunnel alignment, and track profile permit it and projected ridership warrants it. For more information on transfers, please see Chapter 2.

Comment 45: Direct service between Queens and East Midtown via 63rd Street and Second Avenue would ease conditions on both the Lexington Avenue subway and existing Queens lines (E F R 7), because customers would no longer have to use congested transfer points at 60th Street, 53rd Street, and 42nd Street. But full Queens service depends in additional improvements in Queens to develop full capacity of the 63rd Street Tunnel. (*Olmsted*)

Response: The full-length Second Avenue Subway analyzed in the FEIS includes a connection from the line to Queens. In the near term, this connection would be used for non-passenger service diversions and reroutes due to disruptions. If the capacity of the Queens subway network is increased in the future, or if existing service is reconfigured, this connection, along with available track capacity on the planned Second Avenue Line south of 63rd Street, would enable additional subway service between Queens, Midtown, and the Financial District to be provided.

Comment 46: The estimated construction costs for the MESA subway are way out of line with subway projects in other cities. (*Haikalis*)

Response: A construction cost estimate is included in the FEIS for the full-length subway; see Chapter 2. This estimate was developed taking into consideration the cost of similar work in other cities, as well as the particular complexities of constructing in Manhattan and the site-specific issues associated with this project's alignment. NYCT and its consultants for the Preliminary Engineering phase have reviewed this order-of-magnitude cost estimate.

OTHER SUBWAY ALTERNATIVES

Comment 47: The alternative extensions in the Bronx are not described in the DEIS. You should have a full-fledged plan even if you are going to build part of it. (*Haikalis*)

Response: The project currently proposed and analyzed in the FEIS is the full-length Second Avenue Subway in Manhattan. This project is being designed so as not to preclude future connections to the Bronx, but no such connections are currently proposed or designed.

Comment 48: The bottleneck on the Lexington Avenue Line is due to dwell times at Union Square, not 86th Street or Grand Central. A solution would be to construct a small segment that can run right down Lexington Avenue south of Grand Central Terminal, rather than bending over to Park Avenue as the current line does. This would avoid the other subways at and around Union Square. A new station could be constructed at Grand Central in a different location than the current one, to disperse the rush hour flow. This could be constructed in conjunction with a new Second Avenue Subway, but could be completed sooner. (*Vincent*)

Response: Although the Union Square Station presents operational problems, since trains must wait while the moving platforms are extended and retracted, surveys and analysis show that the bottlenecks on the Lexington Avenue Line are at the 86th Street Station and 42nd Street/Grand Central Station. Building an additional segment to take the overflow during rush hour might increase capacity on the line, but it would be confusing operationally (how passengers transfer among trains, for example) and difficult to construct. In addition, this would not meet the project's goal of improving mobility on Manhattan's East Side, particularly the far East Side.

Comment 49: NYCT should reactivate the lines that were closed down, like the Q and other subways in south Jamaica. (*Williams-Pereira*)

Response: This project's goals and objectives are related to easing congestion and increasing access on the East Side of Manhattan. Changes to service on other lines and in other parts of the city are not part of the scope of this study, although nothing in this study precludes them from happening.

Comment 50: Instead of having subway lines depend on bridges that have to be shut down, we should have built tunnels there a long time ago. Those would be good links to the new Second Avenue Subway. (*Gangursky*)

Response: Comment noted. The proposed Second Avenue Subway would not preclude this construction, but also does not include it. In addition, this would not meet the project's goal of improving mobility on Manhattan's East Side, particularly the Far East Side.

NO BUILD ALTERNATIVE

Comment 51: The No Build Alternative in the 1999 DEIS is inconsistent with the MTA's current capital plans, because it assumes the completion of the DeKalb-Rutgers connection. The DEIS provides this as the reason for not considering the use of the Rutgers Street Tunnel in any MESA project alternatives. (*RPA*)

Response: The DeKalb-Rutgers connection is not part of the No Build Alternative in the FEIS, because there are currently no plans to construct it.

As part of the full-length Second Avenue Subway studied in the FEIS, Brooklyn passengers on the F line would be able to transfer at Houston Street (the Second Avenue Station on the F line) to the Second Avenue Line.

Comment 52: The concept of building yet another subway when those we have aren't in proper working order is without merit. Before we can ask for new funds, we have to show that the funds we were given to fix the existing subways were used properly and lines shut down for work are back in service. This has not been done: we have lots of lines that are shut down (for example, the E and F lines in Queens). (*Gangursky, Hecht*)

Response: For the past two decades, NYCT has focused on improvements to its existing system to attain a state-of-good repair. Today, approximately 80 percent of the elevated and subway structures are in a state-of-good repair, and improvements continue on the rest of the system. Work on the Queens Boulevard Line, including the EF service, related to completion of the new 63rd Street Connector Project, has recently been completed. In addition, the long lead time for new projects requires that their planning, environmental review, and design take place now.

TRANSPORTATION SYSTEMS MANAGEMENT (TSM) ALTERNATIVE

BUS SERVICE

Comment 53: The well-thought-out TSM Alternative (the New York Bus Lanes) should be implemented on a priority basis. It is good that there is recognition of the need for bus priority lanes along First and Second Avenues between Houston and 96th Streets. In addition, NYCT should add bus service in areas of the Lower East Side, such as on Houston Street and Grand Street, on routes developed in conjunction with local residents and riders. These should be implemented immediately. This is a good short-term solution pending completion of a long-term full-length Second Avenue Subway. (*Connor, Glick, Reilly, Schrift, Sepersky, Silver*)

Response: Although the TSM Alternative provided benefits, it did not substantially improve East Side mobility or solve overcrowding on the Lexington Avenue Line and had limited utility to reduce travel times. NYCT can consider these and other improvements separately from the Second Avenue Subway, making

decisions on approval or timing based on system transit priorities and funding availability.

Comment 54: As interim relief while the Second Avenue Subway is being constructed, NYCT should work with the Police Department to improve conditions along First and Second Avenues for the M15 bus to provide faster service. The Police Department should enforce regulations against double parking to help reduce traffic congestion. NYCT should also extend limited-stop express service to later in the evening, such as 11 PM or midnight. (*Pisetzner, Smith*)

Response: NYCT supports efforts to enforce the law and improve chronic traffic flow problems. NYCT continually attempts to advance various forms of expanded traffic treatments that favor improved bus operation with New York City Department of Transportation (NYCDOT). These are individually reviewed by NYCDOT. Unfortunately, many of these require both a very high level of enforcement and a concomitant reduction in either parking or lane availability for general purpose traffic. While some have been approved, many have not, resulting in continued congestion. NYCT will continue to advance this discussion with NYCDOT.

Comment 55: Any buses used in the TSM Alternative must be powered by non-polluting technologies and have enhanced seating capacity. (*Sepersky*)

Response: As noted above, with the Second Avenue Subway extending to Lower Manhattan, bus options are no longer being considered in conjunction with this project. Replacement of the existing fleet with reduced-emission technology and higher-capacity buses is part of NYCT's ongoing program. NYCT will be purchasing more than 1,000 new buses, and by 2006, NYCT will have almost 650 40-foot compressed natural gas buses and almost 390 hybrid buses.

Comment 56: To avoid the delays associated with loading wheelchair passengers onto buses, I suggest that particular buses be designated for just the disabled, following a set schedule. (*Pisetzner*)

Response: NYCT has a service designated for the disabled. This service, "Access-A-Ride," is a shared ride, door-to-door paratransit service for people with disabilities. In addition to this service, ADA requires that buses be accessible to all customers, including those with disabilities. ADA also requires that all buses procured by agencies that receive federal funds be accessible to disabled individuals, including customers who use wheelchairs.

Comment 57: Use of articulated buses is counter-productive, as the increase in boarding time would negate the time-saving purpose of priority lanes. (*Schrift*)

Response: Articulated buses are assigned to high-volume bus routes where ridership demand and ridership growth requires significant expansion of passenger carrying capacity. The introduction of articulated buses increases overall passenger capacity on a given route as well as the number of available seats for those passengers. While there is some increase in boarding time because of the

greater number of customers boarding the bus, the wider doors and less crowded aisles help to ameliorate this effect. As noted above, the priority bus lanes are no longer part of the project. With the continued growth in transit ridership, NYCT has included expanded articulated bus deployment as critical to its initiatives to provide needed capacity in an efficient manner on high-volume routes.

VEHICULAR TRAFFIC

Comment 58: Measures to reduce motor vehicle use were not explored. These could include value pricing and parking restrictions. (*Haikalis*)

Response: As discussed in Chapter 1 of the 1999 DEIS and Chapter 1 of the FEIS, the goal of the project is to improve transit service on the East Side of Manhattan and relieve overcrowding on the Lexington Avenue Line. Within this goal, options were evaluated by many factors, including the extent to which they would reduce motor vehicle use. Value pricing and parking restrictions are citywide issues beyond the scope of this study, and to the extent that they increase transit use, they would increase the need for the proposed project.

Comment 59: If traffic engineering methods now exist that can improve traffic flow on crosstown streets and those that access the Queensboro Bridge, why wait to implement them? (*Schrift*)

Response: As was noted in the 1999 DEIS, conditions near the Queensboro Bridge as well as on many cross streets in the city are severely congested. The New York City Department of Transportation (NYCDOT) routinely adjusts traffic signal timing in response to local conditions, to control congestion to the extent possible. Further, traffic enforcement agents are deployed at many intersections near the Queensboro Bridge to allow traffic to flow toward the bridge as efficiently as possible.

Comment 60: What about getting rid of some of these small buildings that would eventually be redeveloped and creating garage facilities? This would reduce double parking and ease congestion. (*Pisetzner*)

Response: Creating new parking facilities throughout the city is not New York City's current public policy, which seeks to encourage the use of mass transit and not private vehicles. In any case, decisions relating to the use of private property are up to the property owners, unless the City, State, or Federal government acquires the properties. New parking facilities would not meet goals and objectives to reduce congestion and improve air quality.

SUBWAY SERVICE CHANGES

Comment 61: If the Lexington Avenue subway capacity could be increased by one express train and four local trains per hour, why not do it immediately? (*Schrift*)

Response: There is no capacity to increase express service during the peak hour; however, express service was recently increased slightly in the shoulder periods. In

addition, local service has recently been increased. Since completion of the 1999 DEIS, NYCT has continued to implement measures to increase Lexington Avenue subway capacity. These measures include the application of platform management techniques at Grand Central-42nd Street Station—such as the "step aside and speed your ride" program, automated dwell control announcements, quick response to customers requiring medical attention, and platform assistants to expedite loading and unloading—and the introduction of new cars with wider doors, to ease movement into and out of the cars. (See Chapter 5B of the FEIS, "Transportation—Subway and Commuter Rail," for more information.)

Comment 62: There was little consideration for short-term (TSM) proposals to relieve Lexington Avenue Line overcrowding by making better use of NYCT's existing transportation assets. Measures could include running more local trains, since capacity is available, to divert some riders from the express trains; improving signaling; encouraging Bronx residents to ride on less crowded routes by adding a second Concourse Express service (running the B express on the Central Park West route); and switching the Jerome Avenue and White Plains Road (4 5) to local and the Pelham Bay (6) to express, thus encouraging a shift to the West Side lines. (*Haikalis, Read*)

Response: Local service on the Lexington Avenue subway is provided in conformance with loading guidelines, where sufficient track capacity exists. Since 1999, more locals have been added. Unfortunately, the much higher demand for express service exceeds the capacity of the express component of the line, which is a fundamental reason for the FEIS. Switching express and local service in the Bronx would hurt more people than would be helped, and would not generally affect overcrowding.

Comment 63: Other improvements for the Lexington Avenue subway were not well defined. For example, the system needs improvements to ventilation, more escalators, elevators, and welded rail. (*Haikalis*)

Response: NYCT is in the process of upgrading its entire system to achieve and maintain a state-of-good repair. Among the changes being implemented are improvements to ventilation and additional escalators and elevators at many stations, as discussed in Chapter 2 ("Project Alternatives") of the FEIS. These improvements to the existing system are part of the No Build Alternative, as they are independent of—and do not meet the goals and objectives of—the Second Avenue Subway project.

Comment 64: Instead of proceeding with MESA, we urge the MTA to focus on linking Metro-North to Lower Manhattan via the 63rd Street Tunnel using hybrid equipment, which we believe will cost much less than MESA. This plan should look at opening stations in the Park Avenue tunnel, increasing service and reducing fares on Metro-North service in the Bronx; providing free transfers between Metro-North and NYCT service; and adding new service on a Hell Gate line. (*Haikalis, Read*)

Response: Similar alternatives were initially considered, both in the MIS for this project and for the Lower Manhattan Access Study. In both cases, the alternatives proved to be infeasible. More important for the Second Avenue Subway, the suggested alternatives would not meet the goal of the project to provide transit service to the East Side of Manhattan.

LIGHT RAIL TRANSIT (LRT) ALTERNATIVE

The comments received on the 1999 alternative that included light rail transit (LRT), including those citing the significant impacts it would have on traffic congestion, parking, pedestrian safety, and other neighborhood conditions, are consolidated in Comment 65. As discussed in the response below, an alternative that includes an LRT component is no longer under consideration.

Comment 65: The LRT alternative for the Lower East Side in the MESA DEIS, a poor substitute for an extended subway, is unpopular and unrealistic. It would disrupt already congested traffic, business, and the general quality of life for the affected residents. We believe that the impacts to the neighborhood and traffic in the area may be underestimated. The DEIS does not present a case that the ridership benefits warrant the cost and disruption associated with this proposal. (*Duane, Glick, Maloney, Miller, Silver, EPA*)

The north-south streets and avenues in the areas being considered for LRT are already extremely congested with vehicles of every type, and many are narrow. The design appears to take up too much space by requiring two traffic lanes and 200-foot-long station platforms. This would increase traffic congestion, reduce the number of bus stops, and displace 440 on-street parking spaces, which would be unacceptable. The proposal for a station platform on Kazan Street between Grand and Delancey Streets is ill-advised, as this narrow street is very often congested. The tunnel portal on Canal Street would physically divide Canal Street and reduce its capacity, exacerbating overcrowding, pollution, and pedestrian safety in a corridor already fraught with these problems. (*Connor, Daniels, Fields, Glick, Silver*)

Build Alternative 2 (the subway in combination with the light rail option) would still leave East Midtown and Midtown South/Medical Center unserved. The LRT may well reduce access to the Lower East Side and Lower Manhattan. The proposed light rail stations are too far apart. (*Connor, Daniels, Fields, Silver*)

What kinds of vehicles are proposed for the light rail transit? (*Felson*)

How will local traffic be controlled? Will such traffic ever be able to cross the route safely? How will pedestrians be able to cross the route safely? I am concerned about public safety in this alternative. (*Schrift*)

The cut-and-cover construction at the two transition areas would most certainly impact adversely on the adjacent areas. For example, the Frankfort Street portal abuts Pace University, the Southbridge Towers housing complex, and NYU Downtown Hospital, all of which would be adversely affected by air and noise pollution and possible hazardous materials contamination during construction. (*Silver*)

Other areas of concern for the LRT include miles of overhead wires and hundreds of support spans 100 feet apart; adverse impacts on the many historic residential buildings, libraries, schools, theaters, houses of worship, and settlement houses near the LRT; and the location and impact of the six electrical substations required for the LRT and the ability of Con Ed to provide sufficient service throughout the Lower East Side. (*Silver*)

Instead of the LRT alternative, we suggest that MTA and FTA pursue an option of alternative fuel buses in a dedicated bus lane with tight headways running along the route of the LRT, or a combination of the TSM Lower East Side proposal along with the LRT routes. We believe this will serve the ridership anticipated for the LRT with less impact to traffic, air quality, and the surrounding neighborhood. (*EPA*)

With the LRT, we would lose the M15 bus route in Lower Manhattan, the only bus running all the way to South Ferry. (*Connor, Daniels*)

The New York City Economic Development Corporation (EDC) issued a Request for Proposals for the site recommended by the MESA DEIS as the preferred alternative for maintenance and storage of the LRT, in the Seward Park Urban Renewal Area Extension. Similarly, the alternative location proposed on Piers 9, 13, and 14, is also proposed for a different use, since EDC initiated a process earlier this year for that site, and since the Manhattan Waterfront Plan discourages industrial use on that site. (*Connor, Silver*)

Response: As mentioned above, the LRT alternative is no longer being considered. As part of the early alternatives analysis conducted for the MESA MIS/DEIS (described in Chapter 2 of that document), numerous alternatives were considered with different LRT configurations. In response to comments made during public review of the DEIS and in consultation with public officials and the public outreach program, MTA/NYCT has selected a full-length subway as the preferred alternative. That option is evaluated in the FEIS.

Comment 66: The DEIS did not consider a minimum operable segment, perhaps to 72nd or 86th Street. This could be packaged with a full-length light rail alternative. Light rail transit could be used as a feeder to the subway. Light rail south of 63rd Street was not considered, and we think it's a very real option. NYCT should consider extending the light rail route west on 14th Street to the Hudson River and adding more stops on Avenue D. In addition, all-surface light rail options without the tunnel connection to Chambers Street Station should be considered. This could work via East Broadway and Gold, Fulton, and Water Streets, with some segments in pedestrianized streets. Further, the estimated construction costs for the light rail are way out of line with light rail projects in other cities. One positive aspect of the light rail alternative is that it costs from 1/5 to 1/10 what subways cost and it could be built a lot sooner. (*Haikalis*)

Response: The MIS/DEIS considered a full-length light-rail alternative. It was eliminated because it did not offer enough capacity, and its location on the surface would have displaced substantial traffic flows onto already congested parallel streets.

Adding a minimum operable subway segment to that alternative would not eliminate its basic problems.

EVALUATION PROCESS FOR ALTERNATIVES

Comment 67: The MESA DEIS is a report with limited objectives that lead to narrowly based alternatives. The MESA MIS/DEIS limits itself to two narrow objectives—relieving overcrowding on the Lexington Avenue Line and shortening walking distance to the subway for East Side residents—but its alternatives fail to meet them. How can a DEIS that must identify alternatives to reduce overcrowding on the Lexington Avenue Line not consider a full-length subway? The MESA subway is not a reasonable alternative to a full-length subway. *(Ferrer, Fields, Freed, Gottfried, Maloney, Oddo, Zupan)*

The full-length subway is an alternative that would meet the purpose and need, and is the only alternative that meets the project's goals, but it is conspicuously missing from the DEIS. Since the full-length subway has been anticipated for several decades and has broad support, the full alternative or a very detailed description of the rationale for its elimination should have been included for review by the public and decision-makers. While identifying funding for the full project may be problematic at this time, there may be other solutions that should be examined, such as an alternative that brings the subway to Delancey Street. Also, we understand that MTA may propose to complete the subway to Water or Delancey Street in a phased approach. Those solutions should be fully evaluated, comparatively against the other alternatives, in a subsequent NEPA document. We strongly recommend that FTA release a supplemental DEIS that contains information on any or all of the alternatives we have mentioned. Comments received on the DEIS should be used as a guide to frame the issues in the next NEPA document. (*Connor, Fields, Freed, Goodman, Maloney, Miller, EPA*)

The MTA is at odds with the requirements of SEQRA and NEPA. It is a critical fundamental obligation under both laws that the FEIS adequately consider the alternatives and that the agency, in fact, consider the alternatives, but the DEIS fails to adequately consider the alternative of the full-length subway. (*Goodman*)

MESA eliminates a build alternative from East Harlem to East Midtown on the basis that it deals only with the northern portion of the study area, but then illogically finds acceptable a much shorter subway spur that does not provide service on the East Side as far south as East Midtown. (*Fields*)

Response: The alternatives evaluation process followed for the MIS/DEIS is described in Appendix B of this FEIS. The alternatives that were analyzed in the MIS/DEIS had been found to meet the project's goals and objectives during that evaluation. However, in response to comments made during public review of the DEIS and in consultation with public officials and the public outreach program, MTA/NYCT has selected a full-length subway as the preferred alternative. That option is evaluated in the FEIS.

Comment 68: If the MESA Study had included the markets in Queens, Brooklyn, and the Bronx, different alternatives might have been developed, such as a Queens service through the 63rd Street Tunnel and turning south on Second Avenue, a new Bronx service, or new connections to Brooklyn. The FEIS must redefine the project scope to include the Bronx, Queens, and Brooklyn as part of the study area, and then must redefine a service that would run from East Midtown to the Lower East Side to downtown Brooklyn, a service beginning in Queens and running down Second Avenue via the 63rd Street Tunnel, and a service from the northern Bronx Co-Op City area. (*RPA*)

Response: The project's goals and objectives were established at the beginning of the study, during the scoping process. These goals and objectives, developed with public input, were designed to address transit problems on the East Side of Manhattan. The goals and objectives are detailed in Chapter 1 of the FEIS, and the process used to develop alternatives is described in Appendix B. The proposed project would not preclude such service being provided in the future. At the present time, the project is defined as one to provide improved transit service to the East Side of Manhattan and to relieve overcrowding on the Lexington Avenue Line in Manhattan.

Comment 69: The discussion of alternatives in the DEIS is inadequate. Decisions are stated without the rationale or supporting data presented. The description of the Long List of Alternatives is unintelligible and the ridership forecasts of the alternatives and other quantitative data are not provided. The alternatives eliminated are not adequately described in the DEIS or the supporting documentation. Further, the definition of what MESA calls the Second Avenue Subway confusingly changes as the alternative moves forward. The descriptions of each of the alternatives ultimately rejected are too brief to be fully understandable. The FEIS should include sketch maps and more complete descriptions of each long list alternative. Similarly, the Reduced Long List of Alternatives is derived without adequate explanation of why various options were eliminated or how they compared to those that were not.

Similarly, the Refined Long List Alternatives Evaluation Summary does not show the ridership forecasts for each alternative, nor the hours saved or hours less crowded. Much of the qualitative data that is purported to directly support the qualitative evaluations are also omitted. Consequently, no explanation is offered as to why the full-length Second Avenue Subway alternative receives a lower population accessibility rating than the other options or why it would have a high to very high adverse impact on open space. The supporting documentation bases this rating on the potential for construction impacts on these parks, but tunnel boring would seem to greatly reduce for such impacts.

The Alternatives chapter also does not offer an explanation of what threshold benefit-to-cost ratio was being sought and therefore it is impossible to understand the rationale behind rejecting any alternatives. Further, it was not stated whether the cost-benefit was the only factor in deciding if an alternative were to be eliminated.

The FEIS should clearly provide all relevant data used in decision-making concerning alternatives and their acceptance or rejection for further study, including ridership projections and cost-benefit ratios. (*Fields, RPA*)

Response: Appendix B, "Development of Alternatives," in the FEIS summarizes the work done in the MIS to evaluate alternatives that meet project goals. Additional detail is provided in the MIS/DEIS, which was conducted according to FTA and MTA guidelines, and with considerable public participation. As noted above, in response to comments made during public review of the 1999 DEIS and in consultation with public officials and the public outreach program, MTA/NYCT has selected a full-length subway as the preferred alternative. That option is evaluated in the FEIS.

CONSTRUCTION METHODS

PHASING

Comment 70: The initial tunneling and construction of a Second Avenue Subway should be done at the southern end of Manhattan, proceeding north from there. (*Sanders*)

Response: As discussed in detail in Chapter 3 of the FEIS ("Description of Construction Methods and Activities"), there are a number of options for subway construction, and several scenarios are evaluated.

Comment 71: Innovative contracting techniques such as Design/Build/Transfer or Lease should be considered. There may be economies of scale in doing the whole job at once. For example, MESA contemplates using a tunnel-boring machine (TBM) from 92nd Street, where the rock begins, to 63rd Street. Suppose the TBM kept on going to 8th Street where the rock runs out? (*Olmsted*)

Response: The issues and impacts associated with construction of the full-length Second Avenue Subway are complex and are discussed in detail in Chapter 3 of the FEIS.

CONSTRUCTION DISRUPTION

Comment 72: How will a Second Avenue Subway ever be built beneath, in, and amid all the rest of the present interminable construction and repair, without rendering impassable every neighborhood through which it proceeds or reducing it to a massive sinkhole? (*Duban*)

Response: The FEIS examines construction impacts of the proposed project and identifies measures to minimize those adverse impacts. See Chapter 3 for more details.

Comment 73: Subway drilling along Second Avenue is anticipated to require the reinforcement of building foundations and the moving of utilities. The general delays and potential mishaps of such preliminaries alone could prove overwhelming. (*Duban*)

Response: As noted above, the FEIS carefully examines the construction impacts of the proposed subway and identifies measures to minimize the effects. See Chapter 3 for more details.

Comment 74: The MESA DEIS does not fully account for the difficulties of building the MESA stub in Upper Manhattan. The decision to use the existing tunnel segments in East Harlem does not appear to have considered the potential cost savings and community disruption that could be avoided by abandoning these segments and boring the entire project. This would avoid the disruption of closing Second Avenue between 10th and 110th Streets and avoid the community disruption associated with the high number of trucks that would need to move through residential areas to haul muck and fill out of the boring shaft sites. (*RPA*)

Response: As explained in the FEIS discussion of construction scenarios in Chapter 3, in the area north of East 92nd Street, bedrock descends to a low of hundreds of feet below street level and boring tunnels through rock in this area would result in a deep line with deep stations. As the existing tunnel segments are approximately 40 feet below the surface, there is not enough clearance to bore new tunnels through the soil above the existing tunnel segments. Mining through soil would work, if the tunnel were deep and the alignment did not use the existing tunnels, which represent a considerable investment of public funds. However, construction of the stations and access to them would still require some cut-and-cover construction activities at the station locations; the result again would be a deep line with deep stations. Stations located close to the surface are preferable for convenience and access. Furthermore, it is important to note that little of the Second Avenue route in East Harlem requires construction of a tunnel in any case; most of the route consists of either existing tunnel or locations where stations are proposed and therefore cut-and-cover work is required in any event.

Comment 75: An obvious alternative would be to bore the entire tunnel, beginning in the Harlem River Yard. The Harlem River Yard site would also be available to bore a tunnel extending north into the Bronx. Construction materials could be hauled out by barge or rail, not trucks. The FEIS must conduct a cost-benefit analysis that considers complete boring of the Second Avenue Subway in East Harlem, with staging to occur at the Harlem River Yards. (*RPA*)

Response: Locating the shaft site in the Harlem River Yard would require that an additional tunnel be constructed under the Harlem River. As described above, the rock in this part of Harlem is very deep, so construction of this river tunnel could be complex. In any case, launching a TBM from Harlem River Yard would require a deeper alignment through East Harlem. This would not take advantage of the existing tunnel segments, which represent a substantial previous investment of public funds. Using the existing tunnel segments would also reduce construction time and cost. See the response to the previous comment.

In addition, as explained in Chapter 3 of the FEIS, to create a reasonably accessible subway requires a minimum of two different types of tunnel boring

machines, so that a direct boring route from the Harlem River Yards down to Manhattan's tip would be impossible. In addition, this plan would be inflexible; it would preclude construction on more than one section of the alignment at the same time, and would create a condition in which no station could be built and no service could operate until the entire tunnel was completed and all the spoils from the tunnel were removed. Working the entire project from one shaft site would take far longer and be more expensive than other options described in Chapter 3. In addition, all the impacts would be concentrated in one area.

Comment 76: Many changes in technology, including new tunnel boring and open cut technologies, have made heavy construction more community friendly since the last subways were built. Nonetheless, subway construction will create short-term neighborhood inconveniences. Even so, there has been strong support all over the East Side. (*McArdle*)

Response: Comment noted.

SHAFT SITES

Comment 77: The three sites listed as potential boring shaft sites are all too small, and would therefore increase the impact on surrounding neighborhoods because construction vehicles and trucks would need to be stored on adjacent streets. While the DEIS indicates that 40,000 to 60,000 square feet is the optimal size for a site, the sites identified in the document are all smaller. The support activities around the sites, including ventilation, dust control, and muck removal, would be extremely difficult to accomplish in such a tight space. Much of the staging would need to be conducted off-site, with materials and equipment trucked in immediately prior to use. This is likely to result in the storage and queuing of large vehicles on adjacent streets. The vulnerability of such an arrangement to disruption from traffic is very high and will significantly increase construction costs. (*RPA*)

Response: Chapter 3 in the FEIS addresses a full range of shaft site options, their size, the operations that could take place, and the impacts of staging and spoil removal.

Comment 78: The DEIS indicates that a shaft site should be a minimum of 10,000 square feet, and optimally 40,000 to 60,000 square feet. The preferred shaft site in the DEIS, at 97th Street and Second Avenue, is just 10,000 square feet and is across the street from Metropolitan Hospital, adjacent to a playground and residential buildings, and at a site that the DEIS acknowledges will be particularly disruptive to a school and a mosque. It should be eliminated from consideration. (*Fields*)

Response: The shaft site identified as preferred in the DEIS, on the west side of Second Avenue between 96th and 97th Streets, is no longer under consideration. Information on the shaft sites and other construction activities is provided in Chapter 3 of the FEIS. As described there, an extensive search was undertaken for suitable shaft sites along the project alignment, an area where all sites are close to sensitive land uses. One of the sites being considered in the FEIS as a

potential staging area (rather than shaft site) is on the east side of Second Avenue between 96th and 97th Streets, across the avenue from the site described in the comment. Other sites are also being considered, as detailed in Chapter 3.

Comment 79: Of the two remaining sites on Second Avenue in the 60s, the one at 63rd Street is too small based on the criteria provided by the DEIS and may be pre-empted for use by the LIRR East Side Access Project. This leaves one potential site, and others need to be considered. (*Fields*)

Response: As noted above, the FEIS addresses a full range of shaft site options, their size, the operations that could take place, and the impacts of staging and spoil removal. It is clear from the analyses that very few appropriately located large sites are available in Manhattan.

AIR QUALITY

Comment 80: We have some concerns with the air quality analysis in the 1999 DEIS. The transportation conformity rule requires federal projects in nonattainment areas to conform with the State Implementation Plan (SIP). For a project to conform, it cannot cause or contribute to a violation of the National Ambient Air Quality Standards (NAAQS), increase the frequency or severity of any existing violation of the NAAQS, nor delay timely attainment of NAAQS. Transportation projects that are from a conforming Transportation Improvement Program (TIP) and long range plan (LRP) are considered to conform to the rule. The 1999 DEIS indicates that the Second Avenue Subway is contained in the TIP. To satisfy the transportation conformity requirement, FTA must identify *what* TIP and LRP it comes from and *when* they were found to conform. Otherwise, in order for this project to proceed, it must be determined to conform by following the project-level analysis requirements of 40 CFR 93.100. We recommend that FTA perform an evaluation of the full subway options. (*EPA*)

Response: The evaluation of the full-length subway option includes a project-level analysis, as discussed in Chapter 11, "Air Quality."

Comment 81: All proposed project alternatives must be considered in assessing the air quality impacts of this project and its potential interim effects on the attainment status of New York County. All of the impact assessments must follow the EPA's Guideline on Air Quality Models (40 CFR Part 51 Appendix W) and Guideline for Modeling Carbon Monoxide from Roadway Intersections (November 1992, EPA-454/R-92-005), and employ the latest vehicle emissions model (currently MOBILE5b) with appropriate inputs. However, the DEIS attempts to argue away the necessity for modeling half of the project alternatives, claiming that alternatives are not predicted to affect traffic conditions significantly in certain areas of the study area. Furthermore, with plans to link the LIRR to Grand Central Terminal by 2009, but not complete the Second Avenue Subway on the Upper East Side until 2015, the claims of insignificant increases in bus volumes and traffic conditions may not be valid. Accordingly, since the definition of

affecting traffic conditions significantly is subjective, the DEIS should model all project alternatives to demonstrate their effect on air quality. (*EPA*)

Response: None of the alternatives that were addressed in the DEIS were major vehicular trip generators. In most scenarios, no noticeable change in peak hour on-street traffic when compared with the No Build condition would be expected from any of the alternatives in the DEIS. This was not a subjective analysis, but was based on the quantified traffic estimates of on-street vehicular changes for the various alternatives that were addressed in the DEIS. The analyses in the DEIS focused on the worst-case locations that would be subjected to incremental traffic, largely due to diversions of traffic from other streets. In any event, air quality impacts of the project are addressed fully in the FEIS.

In the FEIS, the MTA LIRR East Side Access Project is considered to be complete under the No Build Alternative. The analysis of that alternative addresses the cumulative effects of the East Side Access Project with other projects and general growth predicted for the analysis year, 2020. Thus, the air quality analysis of the Second Avenue Subway appropriately includes the MTA LIRR East Side Access Project.

Comment 82: The DEIS claims, "the total bus volumes along routes affected by the Build Alternatives are minor, and the overall effect on particulate levels in the study area zone would be localized and insignificant," yet no quantification is provided in support. Since Manhattan is a nonattainment area for PM_{10}, the DEIS should quantify the effect on PM_{10} levels resulting from each proposed project alternative. (*EPA*)

Response: The potential PM_{10} impacts from the full-length Second Avenue Subway are addressed in the FEIS.

Comment 83: The full-length subway under the MetroLink proposal will result in better air quality, because people will ride the new subway rather than drive. People also may choose the subway over diesel buses. The MESA subway won't do that. (*Aryel, Kassel*)

Community Board 11 supports a full-length subway to reduce the number of diesel buses that come up to East Harlem. (*Shelton*)

Response: Comment noted.

INFRASTRUCTURE AND ENERGY

Comment 84: Where will the power come from to build and to run a new subway? New York City's power infrastructure is inadequate today to handle the needs during hot weather. (*Duban*)

Response: The New York Power Authority would supply the power for the construction and operation of the Second Avenue Subway, and Con Edison would distribute the power. These organizations have indicated that they are prepared to

undertake this when required. More details are discussed in Chapter 13, "Infrastructure and Energy."

ENVIRONMENTAL JUSTICE

Comment 85: The adverse environmental effects of building the MESA subway spur would fall most heavily on minority, elderly, and low-income neighborhoods. This is unnecessary, unfair, and unacceptable. For example, cut-and-cover tunnel construction methodology is proposed only for areas north of 96th Street, as is what appears to be the preferred site for construction staging and shaft site. Moreover, construction using cut-and-cover in this area is estimated to take four years, even though some sections of the tunnel have already been completed, while tunneling south of 96th Street is estimated to take only two years using the less disruptive tunnel boring technique for a longer length of tunnel. The FEIS should lay out a plan that treats all neighborhoods fairly in the construction and development of transit services. (*Fields*)

Response: As noted above, the discussion of construction scenarios in the FEIS explains that in the East Harlem area north of East 96th Street, bedrock is deep and use of a rock TBM in this area would result in a very deep line with very deep stations that would not be preferable for convenience or access. Mining would work, if the tunnel were deep and the alignment did not use the existing tunnels. However, construction of the stations and access to them would still require some cut-and-cover construction activities; the result would again be a deep line with deep stations. Stations located close to the surface are preferable for ease of accessibility. Furthermore, it is important to note that little of the Second Avenue route in East Harlem requires construction of a tunnel; most of the route consists of either existing tunnel or locations where stations are proposed and therefore cut-and-cover work is required in any event. See Chapter 18, "Environmental Justice," for more on this issue.

Comment 86: The DEIS states that the subway should be built in stages so that service to 86th Street and points south could begin while the northern segment is still being built. The FEIS should lay out a plan that treats all neighborhoods fairly in the construction and development of transit services. (*Fields*)

Response: Chapter 3 of the FEIS explains in general the various construction methods that can be used for the project and possible construction scenarios. The specific sequencing to be used for construction is being developed as engineering continues, and will depend on construction feasibility and availability of funding.

Comment 87: The white wealthy influential NIMBYs may kill the project, if they think construction will hurt their properties. The message is that the least amount of building—and only in industrial or poor minority neighborhoods—the better. (*Read*)

Response: A full-length Second Avenue Subway cannot be built without going through the full length of the East Side and passing through each neighborhood along the way. See Chapter 18, "Environmental Justice," for more on this issue.

INDIRECT AND CUMULATIVE EFFECTS

LIRR EAST SIDE ACCESS PROJECT

Comment 88: Under both NEPA and SEQRA, an agency must act in a way so the cumulative impacts of its actions are taken account of and the agency doesn't segment its actions in a way that prevents them from being considered completely. The MTA failed to do this because it failed to take proper account of the relationship between the LIRR East Side Access Project and MESA. Even more disturbing is apparently a decision was made to go ahead with the LIRR connection before even a DEIS has been issued for that project and submitted for public comment. The DEIS for the LIRR project should have been prepared before making a decision and in coordination with the MESA analysis. (*Goodman*)

Response: The FEIS for the MTA/LIRR East Side Access Project is now complete, FTA has signed a Record of Decision (ROD), the project is in final design, and certain elements of the project are under construction. The project's FEIS has had full public comment, and it examined impacts of its project on the subway system, assuming that the Second Avenue Subway would not be built. This created the most conservative impacts for that project. This FEIS considers the effects of the Second Avenue Subway with the LIRR project in place.

Comment 89: The MTA is obligated under SEQRA to choose alternatives that are consistent with social, economic, and other essential considerations to the maximum extent practicable, and minimize or avoid adverse environmental effects. Due regard for that obligation requires at a minimum a full-scale Second Avenue Subway be operating before the LIRR East Side Access Project is in place. Failure to do so will lead to thousands of hapless LIRR commuters dumped in the grossly overcrowded Lexington Avenue Line. (*Goodman*)

Given the overcrowding to the Lexington Avenue Line brought by the East Side Access Project and the proposal for the MESA subway, I am concerned that MTA's current priorities favor suburban commuters over city residents, particularly Manhattan residents. (*Duane*)

The MESA stub's absence of an effective plan to ease East Side subway crowding jeopardizes support for the highly beneficial LIRR East Side Access Project. East Side Access and RPA's MetroLink must be built in tandem and completely at the same time. (*Aryel, Connor, Fields, Grannis, Reed, Sepersky, Zupan*)

You cannot solve a problem by creating one. The LIRR connector to Grand Central Terminal should be abandoned. (*Duban*)

We are concerned that the expected additional ridership on the Lexington Avenue subway from the LIRR to Grand Central Terminal was not included in

the year 2020 projections. When the DEIS concluded that the stub subway would substantially reduce overcrowding, it failed to take into account the volume the LIRR East Side Access Project would add to the Lexington Avenue Line. If so, the implications for the Lexington Avenue subway have been underestimated and the benefits of the build alternatives overstated. Accordingly, we recommend that FTA and MTA provide a more detailed analysis of the relationship between those two projects. (*Fields, Glick, Maloney, EPA, RPA*)

Connecting the LIRR to Grand Central without building a full-length Second Avenue Subway ignores the probable impacts of such a connection on the rest of the subway system. Completion of the East Side Access Project bringing LIRR service into Grand Central Terminal will only exacerbate current overcrowded conditions. (*Albert, Connor, Gottfried, Olmsted, Smith, Stringer, CB1, ESNA, RPA*)

The new LIRR connector to Grand Central will send 17,000 more riders to the Lexington Avenue Line every day. (*Duane, Ravitz, Williams*)

Approximately 12,000 more daily riders will use the already overcrowded Lexington Avenue line each day as a result of the new LIRR connection to Grand Central. Nearly half of those will arrive between 8AM and 9AM. Adding more passengers to these subway lines will totally negate the benefits from East Side Access. (*Connor, Freed, McArdle, Moskowitz, Russianoff, Stringer*)

East Side Access will bring 12,000 commuters to Grand Central during peak hours. An estimated 4,500 of them will use the southbound Lexington Avenue Line. (*Glick*)

An EIS must be prepared to examine the full-length subway and consider the explicit impact of the proposed East Side Access Project on crowding levels on the Lexington Avenue Line. This should be coordinated with a similar discussion in the DEIS that is being prepared for that project. (*Maloney, RPA*)

Response: As noted above, in response to comments made during public review of the DEIS and in consultation with public officials and the public outreach program, MTA/NYCT has selected a full-length subway as the preferred alternative. That option is evaluated in the FEIS. The FEIS addresses conditions with the proposed MTA LIRR East Side Access Project in place, because the East Side Access Project has published its FEIS, received its ROD, and entered final design, and certain elements of the project are now under construction.

As discussed in the FEIS for the MTA LIRR East Side Access Project, the new LIRR service at Grand Central Terminal will increase use of the subway lines that are available at the Grand Central subway station, creating significant adverse impacts on several station elements (e.g., stairs, platforms). The East Side Access Project FEIS proposes mitigation to reduce these impacts. However, more than 90 percent of riders traveling to Grand Central Terminal on the LIRR are projected to walk to their final destination from Grand Central. All information is fully disclosed to the decision-makers, who balance the project impacts against other essential considerations in choosing whether to move the

project forward. The FTA's Record of Decision on the project sets forth MTA LIRR's commitments to mitigation for that project.

As discussed in Chapter 5 of the Second Avenue Subway FEIS, the full-length Second Avenue Subway would alleviate congestion in subway rides further and improve subway conditions on the East Side either without or with the MTA LIRR East Side Access Project in place. In addition, the increase at Grand Central from East Side Access would be offset by a decrease, compared with the No Build Alternative, in subway riders at stations serving Penn Station.

OTHER PROJECTS

Comment 90: The MTA's Long Range Planning Framework, cited in MESA DEIS as the conceptual basis for considering multiple major new initiatives in the transit system, does not account for either synergies or conflicting impacts of multiple projects. The explicit decision to keep each study separate discourages the development of project alternatives that would address the problems identified in multiple corridors. (*RPA*)

Although the DEIS makes reference to a common planning framework, the actual analyses in the DEIS are completely segmented and do not address common benefits, common impacts, or other aspects of the interaction of MESA with the numerous other studies the MTA is undertaking and the improvements it is planning. This segmentation is inconsistent with basic requirements for preparation of an EIS, and should be resolved in an SDEIS and FEIS. The MESA DEIS draws a firewall between projects rather than searching for synergies between them. The final analysis must integrate the impact of the other projects moving under the umbrella of the Long Range Planning Framework. (*Fields, Maloney, Zupan*)

The MTA indicates that its Long Range Planning Framework is a unified program of improvements that are coordinated in analysis (in terms of regional forecasts and assumptions about current and future levels of service) but are each independent of each other, and can be built without that action affecting the decision to build another. This is not appropriate, as is clear when considering East Side Access. (*Fields*)

One comprehensive plan to meet the various un-met transit needs in New York City should be developed. Then, the compatibility of the current proposal with that larger plan can be judged. (*Tripp*)

The MTA's Second Avenue Subway proposal is missing a regional context. One possibility, building on MTA's current study of Lower Manhattan Access from the suburbs, would be development of a regional commuter rail system. (*Haikalis*)

The objectives of the Lower Manhattan Access Study and MESA are similar, and considerable cost savings could be realized if coordination between or consolidation of these projects were considered. We can join together the MTA's Lower Manhattan Study, which does envision building a Second

Avenue Subway below 63rd Street, and the MESA proposal. Do the whole thing together as one study. (*Adler, Fields*)

Response: The Second Avenue Subway is part of a comprehensive plan conceived in the 1960s. Several major components of that plan have been implemented since then, some of them very recently. These include construction of the 63rd Street Tunnel, the Archer Avenue Line to replace a portion of the J and Z trains in Queens, and the 63rd Street Connector Project, which allows the F train to travel through the 63rd Street Tunnel and down Sixth Avenue.

In addition, the project is part of MTA's long range planning effort, which addresses regional as well as local issues, and is coordinated through the long range planning working group and other MTA studies. For example, the MTA LIRR East Side Access Project's FEIS predicted impacts at the Grand Central subway station on the 4 5 6 7 and S lines without completion of a Second Avenue Subway improvement, and proposed appropriate mitigation for those impacts. The FEIS considers the effects of a full-length Second Avenue Subway at the Grand Central subway station with East Side Access in place, because the East Side Access Project has published its FEIS, received its ROD, and entered final design, and certain elements of the project are now under construction. The Second Avenue Subway would improve conditions at the station and on the trains and would thus work well in conjunction with East Side Access.

Although each of these studies had to be undertaken separately because of the realities of FTA funding requirements in MISs and EISs, MTA created an ongoing working group for all the studies that has coordinated forecasting as well as the synergies or conflicts between and among the projects. Because the alternatives evaluated in the MESA DEIS and in the FEIS would not preclude construction of MTA's other plans, nor would it be necessary for or require the other plans to be built, its separate analysis does not constitute segmentation as defined for NEPA or SEQRA environmental reviews.

Comment 91: More commuters will be added to the system as a result of New Jersey Transit's new service as well as Metro-North's Third Track Project, which will allow more Metro-North trains to come to Grand Central. The new Metro-North commuters at Grand Central will add to the growth we have seen there in the last two years and increase the need for the full-length Second Avenue Subway. (*McArdle*)

Response: The analysis in the FEIS was conducted using ridership projections developed using MTA's Regional Transit Forecasting Model, which accounts for expected changes to ridership on Metro-North Railroad, New Jersey Transit, and the Long Island Rail Road as a result of proposed service changes and other factors.

Comment 92: MESA as currently proposed has the capability of hindering the possible extension of the subway system to LaGuardia Airport now being considered in the LaGuardia Airport subway access study. Using the express tracks of the Broadway Line for the MESA trains would prevent consistent, sufficient, regular service to any proposed BMT-based extension to the airport. (*Sepersky*)

Response: Although the plan does allow for 15 trains per peak hour to travel from the Second Avenue Line down the Broadway Line, this would not impact any proposed LaGuardia service, which would use the local tracks, should that project advance. With the Canal Flip now eliminated, LaGuardia-Lower Manhattan conflicts have also been eliminated.

FINANCIAL ANALYSIS/FUNDING

Comment 93: The MTA has not identified a firm funding source that won't be plundered by officials, as has happened many times in the past for this project. MTA must lock in funding from private and City sources. We are extremely skeptical that the MTA will win Federal, State, and even local funding; a project to benefit Manhattan residents and particularly Upper East Siders won't get support from those outside the city. According to the Independent Budget Office, if the city's Wall Street-driven economy turns sour—and the boom will not last for the subway's time frame—the MTA will not have its share of the funds for the subway. (*Read*)

Response: The MTA has developed a strategy to pay for this project through the same types of funding that has supported the MTA Capital Programs since 1982. The combination of funds paying for the Capital Program is more reliable than having one dedicated funding source, which could change through the project. The Capital Program and the project have the support of state and local officials, and the project is following the normal process to receive Federal New Start funds.

Comment 94: The transportation system is underfunded, particularly with respect to funding levels relative to the city's residents' income compared to spending levels in the nation as a whole. A shift in these priorities would allow the City to afford other alternatives. (*Littlefield*)

Response: The transportation system's critical components, such as rolling stock and track, are in a state-of-good-repair, and the Capital Program allows these components to be replaced at or near their useful life. The Capital Program will bring the entire transportation system to a state-of-good-repair by 2020.

Comment 95: If we had invested all the money that has been spent on studies and legal fees for the subway, we'd have enough to build it. It's time to construct now, rather than spending any more money on studies. (*Littlefield*)

Response: The project could not be built without the engineering work that lays out its designs and the environmental studies (provided in the FEIS) required under Federal law by the National Environmental Policy Act (NEPA).

Comment 96: MTA should explore using private capital and creative funding solutions to fund the new full-length subway. Government and business must join forces to find ways to raise the capital. Perhaps new taxes, fees, and revenues specifically dedicated to the new subway could fund the project. People should accept a fare

increase to pay for the new subway as well. Development fees, value capture, road pricing, gas taxes, and some version of a public/private partnership have been suggested. (*Adler, Cornelius, McArdle, Oddo, Olmsted, Reilly, Sanders*)

Response: Comment noted. The MTA continues to work with its funding partners to find new sources of funds. The MTA has used and will continue to be a leader in innovative financing tools.

Comment 97: The MTA must put adequate funds in the upcoming Five-Year Capital Program for both design and construction to ensure that a full-length Second Avenue Subway can be designed, and construction started within that five-year period. The many groups that comprise the Empire State Transportation Alliance also share this view. If you do that, the City, State, and Federal legislature will be strong lobbies for funds, and the business community will join you to seek creative new financing to get the subway built. (*Connor, Fields, Freed, Glick, Goodman, Gottfried, Grannis, Green, Maloney, Moskowitz, Olmsted, Ravitz, Reed, Sanders, Williams, Zupan, ESNA, RPA*)

The current capital plan should include the funds necessary for engineering studies on the Second Avenue Subway. (*Adler*)

Response: As noted above, in response to comments made during public review of the DEIS and in consultation with public officials and the public outreach program, FTA and MTA in conjunction with NYCT selected a full-length subway as the preferred alternative. Funding for planning, engineering, and environmental analysis of that project as well as some construction, was included in the 2000-2004 MTA Capital Program.

Comment 98: I believe we can find the funding for the new Second Avenue Subway if we stop having so much promotion of the Van Wyck [Air Train] and other lines that people don't want in their communities. (*Williams-Pereira*)

Response: Projects are evaluated for federal funding under the Transportation Equity Act for the 21st Century (TEA-21), which has set aside funding for transportation projects. Projects proposed nationwide are evaluated against each other, using common criteria, to judge which merit funding based on the benefits they provide in relation to their cost. Eliminating one federally funded project, such as the Air Train, in New York City would not mean that federal funding could necessarily be obtained for another instead; each project is evaluated individually on its own merits.

Comment 99: Where will the funding come from for the new subway, particularly given the present cost of union labor with around-the-clock overtime, and the deplorable state of union corruption and racketeering? The thought that a new subway line might be built safely, economically, and in a timely manner is delusional. (*Duban*)

Response: The MTA has been completing projects since 1982 safely and economically. Now that most of the transportation system is in a state-of-good-repair, the

Capital Program can begin to focus on expanding its network and relieving congestion. The funding for this project will come from the same sources that have funded the Capital Program since 1982: bonds; federal, state, and local funds; and MTA funds, such as investment income, leasing of assets, developer funds, etc.

PROCESS AND PUBLIC PARTICIPATION

Comment 100: The MESA outreach process, while extensive, has been limited. The participants in the process have not been provided with enough technical information to reach their own judgments. The public advisory committee has not met in nearly two years (November 1997). The process should be re-energized during the development of the FEIS. (*RPA*)

Response: The FEIS for the full-length Second Avenue Subway was prepared with extensive and ongoing community outreach, which is described in Chapter 4, "Public Outreach and Review Process," of the FEIS. ✷