

**PORT AUTHORITY OF NEW YORK & NEW JERSEY
BUS TERMINAL REPLACEMENT PROJECT**

**Appendix C
Summary of Comments on the
Draft Environmental Impact
Statement and Responses**

Port Authority Bus Terminal Replacement Project

**PORT AUTHORITY OF NEW YORK & NEW JERSEY
NEPA FINAL ENVIRONMENTAL IMPACT
STATEMENT**

**APPENDIX C:
SUMMARY OF COMMENTS AND
RESPONSES**

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A. Introduction

The PANYNJ proposes to replace the existing PABT in Manhattan, New York with a new Replacement Facility and associated infrastructure (Replacement Facility), accompanied by private development to assist in funding the project. These elements are collectively referred to as the Bus Terminal Replacement Project (the “Proposed Project”). A Replacement Facility is necessary as the existing PABT has significant operational constraints that prevent accommodating existing and future bus size, weight, and technology, resulting in the inability to provide an efficient operating condition and to meet forecasted increases in demand. Further, the PABT is an aging building structure with systems that require expensive recurrent maintenance and short-term fixes.

The FTA, serving as lead federal agency, and PANYNJ, the Project Sponsor and joint lead agency, are preparing an EIS to evaluate the Proposed Project in accordance with NEPA (42 U.S.C. § 4321 et seq.), CEQ’s NEPA-implementing regulations (40 CFR §§ 1500-1508), and the FTA’s Environmental Impact and Related Procedures (23 CFR §771).

Prior to the FTA commencing the formal NEPA process by issuance of an NOI, PANYNJ conducted planning-level scoping (initial scoping) in 2019. This provided an opportunity for stakeholders and the public to comment on relevant subjects, including the purpose and need, 13 project alternatives, and methods to identify an LPA. PANYNJ published a Final Scoping Report on January 7, 2021, to the project website (<http://www.pabtreplacement.com>), which documented the initial scoping process, and is hereby incorporated by reference. In conjunction with the NOI, a Draft NEPA Scoping Information Packet (SIP) was made available for public review on June 4, 2021, initiating the formal NEPA scoping process. Virtual public scoping meetings were held on June 23, 2021, and June 24, 2021, at 2:30 p.m. and 6:30 p.m. on each day. Oral comments were received during the virtual sessions and written comments received via e-mail, mail, or web form. A 45-day public comment period extended from June 4, 2021, through July 19, 2021. A Final NEPA SIP was published by PANYNJ on January 20, 2022.

On February 2, 2024, the NOA was published in the Federal Register and the DEIS was made available for public review and comment through the Federal Register and the project website (www.pabtreplacement.com). The public was afforded the opportunity to comment for a period of 45-days, from February 2, 2024, through March 18, 2024. FTA and PANYNJ provided the public numerous methods to comment on the DEIS, including submitting an email to PABTReplacementNEPA@panynj.gov, visiting the PABT Replacement website and leaving a comment through the online comment form; sending a letter to the PANYNJ or the FTA; through voicemail testimony; and through live public testimony at one of the four public hearings held during the comment period.

This document is an appendix to the FEIS and summarizes and responds to comments on the DEIS.

B. Commenters on the Draft Environmental Impact Statement (DEIS)

Individuals, elected officials, agencies, and organizations (“commenters”) were able to submit comments during the DEIS public comment period between February 21, 2024, and March 18, 2024 in a variety of ways:

- Oral testimony was received during four virtual public meetings on February 21, 2024, and February 22, 2024;
- Written comments were received via e-mail through March 18, 2024;
- Comments were received via a web form at www.PABTreplacement.com through March 18, 2024; and
- Comments were received via telephone voicemail through March 18, 2024.

The list (Submission List/ List of Commenters) below identifies all commenters who submitted comments during the comment period. In some instances, commenters used one or more of the available methods for submitting comments. Where a commenter provided oral testimony based on a written statement submitted at the public meeting or shortly thereafter, both the oral testimony and the written statement were reviewed for consistency and completeness. Where duplicate submissions of identical comments were received through e-mail and the web-form, for example, a distinction is not made as to source.

Similar comments received from multiple commenters have been combined under a single comment, referred to as a “Comment Group.” Cross-references between the list of commenters/ submission list (provided below) and the comment groups are provided, as are the cross-references back from the comment group to the list of commenters/ submission list. While minor editing was performed on comments to improve readability, all efforts were taken to retain the substance and tone of comments received. Thirty-two comments from seven submissions were considered “nonsubstantive” and have not been included. Attachment C.1 of this Appendix provides the record of all public comments received during the public comment period.

It should also be noted that many comments seek additional detail on design, such as the location of specific amenities, streetscape elements, or wayfinding elements. Design of the Proposed Project is still underway. Where specific information is not yet available, design intent is indicated.

ELECTED OFFICIALS

1. Al Barlas, New Jersey 40th Legislative District, submitted a letter via email on March 13, 2024 (Comment Group 6)
2. Cory Booker, United States Senator, submitted a letter via email on March 13, 2024 (Comments Groups 4 and 6)
3. New Jersey's 37th legislative district – District Council (DC) 37 submitted comments via email on March 13, 2024 (Comment Group 4)
4. New York City Elected Officials a letter via email on March 13, 2024 Co-signed by Mark Levine (Manhattan Borough President), Jerrold Nadler (Congressman, District 12, Brad Hoylman-Sigal (NYS Senator, District 47), Tony Simone (NYS Assemblymember, District 75), Erik Bottcher (NYC Councilmember, District 3) (Comment Groups 19, 29, 33, 34, 41, 49, 91, 98, 110, 143, 148, 155, 157, 162, 163, and 246)

AGENCIES

5. Mark Austin, EPA, written statement submitted via email on March 18, 2024 (Comment Groups 9, 21, 46, 68, 72, 91, 92, 93, 94, 95, 98, 101, 106, 110, 114, 115, 124, 128, 129, 130, 131, 132, 133, 134, 137, 140, 179, 184, 185, 186, 187, 188, 189, 190, 191, 192, 195, 196, 201, 202, 204, 205, 206, 207, 208, 209, 210, 211, 212, 214, 215, 216, 217, 219, , 223, 230, 237, and 243)
6. Jeremy Colangelo-Bryan, NJ Transit, written statement submitted via email on March 15, 2024 (Comment Groups 4, 6, and 16)
7. Pamela Garrett, NJDOT, written statement submitted via email on March 18, 2024 (Comment Groups 11 and 138)
8. Lois Goldman, NJTPA, written statement submitted via email on February 7, 2024
9. Rashi Puri, Hudson River Park Trust, written statement submitted via email on March 11, 2024 (Comment Group 126)
10. Andrew L. Raddant, United States Department of Interior, written statement submitted via email on March 14, 2024 (Comment Groups 12, 150, and 238)
11. Hilary Semel, NYC Mayor's Office of Environmental Coordination (MOEC), written statement submitted via email on March 18, 2024 (Comment Groups 4, 9, 29, 41, 92, 99, 148, 154, 158, 181, and 221)
12. Jamie Torres-Springer, MTA, written statement submitted via email on March 18, 2024 (Comment Groups 97, 119, and 228)
13. Lu Ding, New Jersey Turnpike Authority, written statement submitted via email on March 25, 2024 (Comment Groups 176 and 181)

COMMUNITY BOARDS

14. Manhattan Community Board 5, Nicholas Athanail, written comments submitted via email on March 25, 2024 (Comment Groups 4 and 76)
15. Manhattan Community Board 4, Jessica Chait, written comments submitted via email on March 18, 2024 (Comment Groups 1, 4, 21, 22, 25, 27, 34, 35, 36, 41, 42, 43, 46, 50, 52, 53, 59, 60, 63, 64, 67, 68, 69, 70, 71, 72, 73, 77, 78, 79, 81, 82, 86, 88, 89, 92, 102, 103, 104, 105, 110, 112, 115,

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16. Manhattan Community Board 5, E. J. Kalafarski, comments submitted via email on March 25, 2024

INTERESTED ORGANIZATIONS

17. Michelle Adams, Tishman Speyer, comments submitted via web form on March 15, 2024 (Comment Group 72)
18. Kai Boysan, Greyhound Lines, comments submitted via web form on March 18, 2024 (Comment Groups 4, 11, 14, 23, 47, 75, 173, and 174)
19. Brandon Buchanan, American Bus Association, comments made at the public hearing on February 21, 2024 (Comments Groups 4, 10, 17, 23, 24, 61, 65, 72, 172, 177, and 242)
20. Maddie DeCerbo, Real Estate Board of New York, comments submitted via webform on March 19, 2024 (Comment Groups 1 and 110)
21. Elizabeth Goldstein, Municipal Art Society, written comments submitted via email on March 18, 2024 (Comment Groups 4, 8, 28, 32, 37, 41, 42, 44, 59, 65, 70, 72, 83, 148, 203, and 226)
22. Tom Harris, Time Square Alliance, comments submitted via email on March 6, 2024 (Comment Groups 6 and 21)
23. Dan Henkel, Clinton Housing Development Company, written comments submitted via email on March 18, 2024 (Comment Groups 1, 2, 26, 40, 50, 80, 89, 90, 91, 92, 96, 98, 99, 105, 106, 107, 109, 110, 115, 117, 118, 120, 121, 123, 127, 130, 141, 171, 197, and 233)
24. Eric R. Johnson, comments submitted via web form on February 6, 2024 (Comment Group 213)
25. William Kelly, Clinton Housing Development Company, comments made at the public hearing on February 21, 2024, and on February 22, 2024 (Comment Groups 104, 109, 113, and 125)
26. Lucie Levine, Historic Districts Council, comments submitted via email on March 14, 2024 (Comment Groups 19, 83, 84, 136, 159, 221, and 226)
27. Patricia Maltezos, Hudson Yards Hell's Kitchen Alliance, comments submitted via web form on March 15, 2024 (Comment Groups 1, 4, 27, 30, 32, 33, 34, 38, 41, 52, 60, 71, 79, 98, 105, 112, 116, 117, 120, 121, 122, 142, 151, 227, 235, 245, and 246)
28. Joe Restuccia, Clinton Housing Development Company, comments submitted via email on March 18, 2024
29. Renae Reynolds, Tri-State Transportation Campaign, comments submitted via web form on March 15, 2024 (Comment Groups 1, 45, 57, 58, 62, and 65)
30. Andrew Schloss, FlixBus, comments submitted via a web form on March 18, 2024 (Comment Groups 4, 6, 14, 16, 23, 47, 72, and 239)
31. Francis A. Tedesco, Academy Bus, comments submitted via web form on March 15, 2024 (Comment Groups 4 and 72)

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32. Rev. Tiffany Triplett Henkel, Metro Baptist Church, comments submitted via email on March 18, 2024 (Comment Groups 1, 26, 30, 48, 59, 80, 90, 91, 105, 110, 118, 121, 157, 222, 241, and 249)
33. Blaire Walsh, NY Landmarks Conservancy, comments submitted via web form on March 18, 2024 (Comment Groups 19, 148, 224, 225, and 250)

INTERESTED INDIVIDUALS

34. Sara A, comments submitted via web form on March 15, 2024 (Comment Group 68)
35. Charles Addison, comments submitted via web form on February 23, 2024 (Comment Groups 34, 71, and 73)
36. Anonymous, comments submitted via web form on February 2, 2024
37. Sally Artisero, comments submitted via voicemail on February 26, 2024 (Comment Group 68)
38. Kari Auerbach, comments submitted via web form on February 27, 2024 (Comment Group 68)
39. Gregg Baker, comments submitted via web form on February 21, 2024 (Comment Group 234)
40. Melvina E. Barnes, comments submitted via web form on February 13, 2024 (Comment Group 44)
41. Cory Bee, comments submitted via web form on February 24, 2024 (Comment Group 68)
42. Sandra Beltrao, comments submitted via web form on March 15, 2024 (Comment Group 68)
43. Jonathan Berzas, comments submitted via web form on March 5, 2024 (Comment Groups 242 and 243)
44. Ron Bhandari, comments submitted via web form on February 20, 2024 (Comment Group 104)
45. Raymond Bianco, comments submitted via web form on February 2, 2024 (Comment Groups 35, 55, and 57)
46. Suzanne Biga, comments submitted via web form on February 29, 2024 (Comment Groups 19 and 146)
47. Save Birds, comments submitted via web form on March 2, 2024 (Comment Group 68)
48. John Brockwell, comments submitted via web form on February 2, 2024 (Comment Group 5)
49. Ryan Brodsky, comments made at the public hearing on February 20, 2024 (Comment Groups 22, 44, 46, 61, 69, and 193)
50. Laurence P. Cherchi, comments submitted via web form on March 1, 2024 (Comment Group 74)
51. Kenneth Chew, comments submitted via voicemail on February 20, 2024
52. Kathleen Cook, comments submitted via webform on February 14, 2024 (Comment Group 35)
53. Brian Crow, comments submitted via webform on February 22, 2024 (Comment Group 69)
54. Serah Delaini, comments submitted via webform on February 20, 2024 (Comment Group 5)
55. Daniel Flaherty, comments submitted via webform on March 14, 2024 (Comment Group 68)
56. Mary Flaherty, comments made at the public hearing on February 21, 2024 (Comment Group 68)

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57. Patricia Franz, comments made at the public hearing on February 21, 2024 (Comment Group 141)
58. Lizandro Garcia, comments submitted via web form on March 15, 2024 (Comment Groups 4, 20, and 57)
59. Ann Gorman, comments submitted via web form on February 25, 2024 (Comment Group 68)
60. Nadine Graham, comments submitted via web form on February 24, 2024 (Comment Group 68)
61. Joan Greenfield, comments submitted made at the public hearing on February 20, 2024 (Comment Groups 104, 120, and 235)
62. Mary Grimes, comments submitted via voicemail on February 26, 2024 (Comment Group 68)
63. Robert Hale, comments submitted via web form on March 15, 2024 (Comment Group 15)
64. Susan Hallinan, comments submitted via web form on February 27, 2024 (Comment Group 68)
65. Adrienne Harris, comments submitted via web form on March 16, 2024 (Comment Group 68)
66. Daniel Harvey, comments submitted via web form on February 6, 2024 (Comment Groups 4 and 87)
67. Michael Huarachi, comments submitted via web form on February 22, 2024 (Comment Groups 62, 72, 73, and 79)
68. Joseph Hycog, comments submitted via web form on February 21, 2024 (Comment Group 61)
69. Mike Jackman, comments submitted via web form on March 2, 2024 (Comment Groups 26 and 91)
70. Joe Jacovino, comments submitted via web form on February 19, 2024 (Comment Group 5)
71. Rebekah Johnson, comments submitted via web form on March 17, 2024 (Comment Group 68)
72. Liz Keef, comments submitted via email on February 21, 2024 (Comment Group 139)
73. Tatyana Kirzhner, comments submitted via web form on February 22, 2024 (Comment Groups 69 and 91)
74. Carol Krinsky, comments submitted via web form on February 2, 2024 (Comment Group 45)
75. Gweyneth Leech, comments submitted via web form on March 16, 2024 (Comment Groups 21, 32, and 72)
76. Jennifer Liebskind, comments submitted via web form on February 5, 2024 (Comment Groups 6, 44, and 80)
77. Mark Lob, comments submitted via web form on February 6, 2024 (Comment Group 4)
78. D Marks, comments submitted via web form on February 21, 2024 (Comment Group 19)
79. S May, comments submitted via web form on February 21, 2024 (Comment Group 107)
80. Sue May, comments made at the public hearing on February 21, 2024 (Comment Groups 19, 115, and 107)
81. Ryan McAuliffe, comments submitted via web form on March 14, 2024 (Comment Groups 61 and 156)
82. RC McBee, comments submitted via web form on March 15, 2024 (Comment Group 68)

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83. Eddie McWilliams, comments submitted via web form on February 27, 2024 (Comment Groups 4 and 6)
84. Michael Mellenger, comments submitted via web form on March 9, 2024 (Comment Group 69)
85. Christie Moore, comments submitted via web form on March 16, 2024 (Comment Group 68)
86. Charles Myers, comments submitted via web form on February 4, 2024 (Comment Groups 5 and 7)
87. Charles Ny, comments made at the public hearing on February 21, 2024 (Comment Group 62)
88. Michael J. Oleaga, comments submitted via web form on February 17, 2024 (Comment Group 44)
89. Deborah Orr, comments submitted via web form on February 24, 2024 (Comment Group 68)
90. Falco Owl, comments submitted via web form on March 2, 2024 (Comment Group 68)
91. Kenneth Paston, comments submitted via voicemail on February 21, 2024 (Comment Groups 39, 61, and 244)
92. Thomas Plocharczyk, comments submitted via web form on February 21, 2024 (Comment Group 120)
93. Daniel J. Pugliese, comments submitted via web form on February 19, 2024 (Comment Group 4)
94. Bin Radensky, comments submitted via web form on February 2, 2024 (Comment Group 63)
95. Kamran Ramji, comments submitted via web form on February 2, 2024 (Comment Group 35)
96. Jonathan Rent, comments submitted via voicemail on February 27, 2024 (Comment Group 51)
97. Kathleen D. Robles, comments submitted via webform on March 16, 2024 (Comment Group 68)
98. Dan Rodriguez, comments submitted via webform on February 12, 2024 (Comment Groups 4, 23, and 52)
99. Michael Rogovin, comments submitted via webform on February 25, 2024 (Comment Groups 7, 44, 72, and 85)
100. Bruce Rosen, comments submitted via webform on March 18, 2024 (Comment Groups 19, 54, and 72)
101. Helen Saffron, comments submitted via voicemail on February 27, 2024 (Comment Group 68)
102. Blake Saleh, comments made at the public hearing on February 20, 2024 (Comment Group 57)
103. Lawrence Scheyer, comments submitted via a web form on February 4, 2024, and on February 21, 2024 (Comment Groups 4, 6, 19, 23, 31, 66, and 172)
104. Kathleen Schlemmer, comments submitted via a web form on February 21, 2024 (Comment Groups 5, 19, 30, 98, 108, and 235)
105. Robert Schumacher, comments submitted via a web form on March 10, 2024 (Comment Group 4)
106. Adele Serunjogi, comments submitted via a web form February 21, 2024 (Comment Groups 4 and 44)
107. Prashantkumar Shah, comments submitted via a web form on February 2, 2024 (Comment Groups 4 and 80)

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108. Nancy Sheran, comments made at the public hearing on February 20, 2024 (Comment Groups 36, 56, and 57)
109. Dominique Singer, comments made at the public hearing on February 20, 2024, and submitted via email on March 8, 2024 (Comment Groups 91, 104, 120, and 235)
110. Christina M. Spina, comments submitted via web form on February 26, 2024 (Comment Group 68)
111. Silvia Taccani, comments submitted via web form on February 21, 2024 (Comment Group 234)
112. Cora Taningco, comments submitted via web form on March 15, 2024 (Comment Group 68)
113. Peter V., comments submitted via web form on February 2, 2024 (Comment Group 13)
114. Eric Michael Vargas, comments submitted via web form on February 22, 2024 (Comment Groups 64 and 69)
115. Tim Walsh, comments submitted via web form on February 6, 2024 (Comment Groups 4 and 63)
116. Brian Weber, comments submitted via email on March 18, 2024 (Comment Groups 1, 3, 18, 27, 34, 38, 41, 46, 59, 67, 71, 72, 79, 100, 110, 111, 124, 178, and 240)
117. James Wegener, comments submitted via web form on February 20, 2024 (Comment Group 7)
118. Carol Wood, comments submitted via web form on March 16, 2024 (Comment Group 68)
119. Maleeka Zainan, comments submitted via web form on March 4, 2024 (Comment Group 4)
120. John Zawislak, comments submitted via web form on February 3, 2024 (Comment Group 4)
121. Grace Zhu, comments submitted via web form on February 22, 2024 (Comment Group 12)
122. Xinhang Zou, comments submitted via web form on March 16, 2024 (Comment Group 63)
123. Michael, comments submitted via web form on March 10, 2024 (Comment Group 6)

C. Comments and Responses

PLANNING PROCESS

Comment Group 1 Manhattan Community Board 4 is grateful for the long and productive consultation with the Port Authority team as plans for the proposed project are developing. We and the community look forward to continuing this valuable engagement as the project moves forward. (15) REBNY remains supportive of the PABT replacement project and urges continued public engagement by the authority. (20) Please describe how PANYNJ will share the plans and provisions for neighborhood safety with the stakeholders in the neighborhood. Please describe what third party management of the safety related plans and provisions will be implemented. CHDC [Clinton Housing Development Corporation] requests that the affected residents are included as an active participant in these discussions. Please describe how PANYNJ will commit to addressing feedback from local residents at each stage of construction. (23) The Hudson Yards Hell's Kitchen Alliance intends to continue our advocacy for the neighborhoods of Hell's Kitchen and Hudson Yards through this entire bus terminal project and beyond. We acknowledge the Port Authority's engagement so far with community stakeholders and look forward to a transformed transit facility that truly reflects its location and context. (27) We encourage strong public engagement in order to ensure that the design process and outcomes addresses the needs of our commuters, who deserve a world class transportation system that improves rather than detracts from their quality of life. (29) Metro has been and remains thankful for the opportunity to participate in the planning of this endeavor and hopes to strengthen the relationship with PANYNJ as we find new ways to serve the community of Hell's Kitchen as neighbors. (32) I commend the PA on its continued outreach and engagement with the community, incorporating both Community Board 4's and HKSC input into the DEIS, and the PA's choice of a best in-class design team. (116)

Response The PANYNJ has a long and established record of performing thorough engagement starting at the early stages of project planning through construction and operations. PANYNJ has performed robust levels of public and community engagement for the PABTR since efforts began in 2013 including public design competitions, public engagement around alternative concepts and different priorities that the new facility should address. This level of engagement continued through the Scoping and DEIS process where the FTA and PANYNJ received several hundred formal comments from the public, in addition to attending dozens of community group meetings. During those engagements, the PANYNJ received and incorporated multiple suggestions modifying the design or operations of the Replacement Facility. The public engagement process, including efforts associated with the NEPA process, are detailed in **Chapter 4 "Public and Agency Outreach & Coordination"** of the FEIS. The dialogue with the public, community and stakeholders will continue following the FEIS and ROD. The PANYNJ intends to establish several platforms for regular engagement with the Community Board, other community or civic associations, local elected officials and travelers in or around the project area. Additional details about the process for engagement regarding specific issues (including safety, quality of life, or other operational issues) will be provided as designs and implementation efforts advance.

Comment Group 2 As the project proceeds, CHDC requests that such reports, filings and documents be shared with us and our consultants to determine and evaluate the impact of the work on CHDC buildings prior to as part of developing any property access agreement with the Port Authority. (23)

Response The PANYNJ will provide copies of design or construction material (including reports, filings, permits, inspection results, etc.) as appropriate with property or business owners.

Comment Group 3 Request that the PA Create (and work with!) community advisory design review board. (116)

Response The PANYNJ is committed to continued engagement with the community around the design of the Replacement Facility and future public open space. The PANYNJ has valued and benefited from the public participation and comments on the project's design and will continue to collaborate with local stakeholders, the community board and other civic groups.

PURPOSE & NEED

Comment Group 4 We are pleased that the Port Authority is finally making progress in building a new world-class bus terminal to replace the existing facility. The current facility has been the scourge of New Jersey commuters for decades, while billions in Port Authority resources went to other projects such as the Oculus. The current structure is dilapidated and is restraining the region's growth; it is beyond repair and must be replaced. Construction of a new terminal is the right path forward for the Port Authority and New Jersey commuters. (2) We applaud the inclusion of elements requested by the City and the community, including the staging and storing facility and permanent open space after construction. (3) NJ TRANSIT appreciates the efforts of the Port Authority and FTA in progressing the DEIS for the Midtown Bus Terminal Replacement Project. Similarly, NJ TRANSIT appreciates the Port Authority's engagement and collaboration with NJ TRANSIT to shape and enhance this crucial initiative, aligning it with our needs in terms of capacity and operational needs. We firmly believe that advancing the LPA for a complete replacement of the PABT will enhance bus operations, accommodate future demand for service, and elevate the experience for NJ TRANSIT bus passengers. (6) We restate the City's agreement with the importance of the Project in supporting the growing population and connectivity in the region serviced by the transit terminal. (11) Community Board Five supports the Port Authority Bus Terminal Replacement Project Plan as described in the DEIS. (14) Manhattan Community Board 4 recognizes that this crucial project will benefit regional commuters, long distance riders, and residents of Hell's Kitchen as well as promote the economic growth of the city while reducing transportation emissions. The Board is pleased that this will be achieved without displacing residents or businesses through the use of eminent domain. This project will provide significant benefits for commuters and for the community: Peak hour terminal capacity will more than double, increasing from 460 buses today to 1,030 buses when the Project is completed, with nearly all buses traveling on the ramps and not on the streets. All intercity bus operations and commuter bus parking will be moved from our streets, parking lots, and sidewalks to the new facility. 141,000 square feet of street-facing retail will be added and many sidewalks widened to improve the streetscape. Two large green open spaces will be created at the end of the Project. Manhattan Community Board 4 recognizes that this crucial project will benefit regional commuters, long distance riders, and residents of Hell's Kitchen as well as promote the economic growth of the city while reducing transportation emissions. The Board is pleased that this will be achieved without displacing residents or businesses through the use of eminent domain. This project will provide significant benefits for commuters and for the community: Peak hour terminal capacity will more than double, increasing from 460 buses today to 1,030 buses when the Project is completed, with

Appendix C. Summary of Comments and Responses

nearly all buses traveling on the ramps and not on the streets. All intercity bus operations and commuter bus parking will be moved from our streets, parking lots, and sidewalks to the new facility. 141,000 square feet of street-facing retail will be added and many sidewalks widened to improve the streetscape. Two large green open spaces will be created at the end of the Project. (15) As the largest intercity bus tenant in the Port Authority Bus Terminal (PABT), Greyhound Lines, Inc. (Greyhound) strongly supports the LPA of the Port Authority of New York and New Jersey (PANYNJ) for replacement of the PABT, as outlined in the DEIS. (18) We fully support initiatives to refresh and expand bus terminal accessibility and provide accessible and enhance transportation options and key hubs like New York City. The ABA believes the PABT project could play a key role in USDOT's revival effort, to serve as the premier model for intermodal redevelopment projects. The ABA believes the PABT project could play a key role in USDOT's revival effort, to serve as the premier model for intermodal redevelopment projects. (19) MAS supports this ambitious proposal to replace the current outdated terminal building, a project that is long overdue. New Yorkers deserve welcoming and functional transportation hubs that will enhance the public realm and foster the use of public transit. (21) The new Port Authority Bus Terminal is long overdue. We at the Hudson Yards Hell's Kitchen Alliance (HYHK) anxiously await the improved ramping system and the ability to get buses off our local streets. The new street-facing retail and public spaces will significantly improve the immediate area. As a BID for the neighborhoods of Hell's Kitchen and Hudson Yards, we plan to be neighborhood advocates throughout the entire process, from planning to construction and finally through operation of the new terminal. We applaud the Port Authority for its engagement so far with community stakeholders and look forward to a new facility that meets the transit needs of midtown with careful consideration for its neighbors in Hell's Kitchen (27) It would be a disservice to these passengers to deny them an adequate facility. Building a beautiful new terminal will grant bus travelers the same well-deserved grand entrance into New York. (30) On behalf of the thousands of daily commuter[s] and our 24/7 staff at ACADEMY, we applaud the dramatic and exciting new plans for a truly new and exciting Port Authority Bus Terminal in Manhattan. We extend our genuine support and commitment to working with you during the years ahead. The plan is truly transformative. ACADEMY is pleased to support the efforts. (31) I'm very supportive of the vision for an enhanced and modern PABT. (58) I love the fact that this is being replaced and I think the proposed plan is great. (66) I'm so fed up, just start construction and knock down the whole bus terminal and convince bus carriers to different locations. (77) I am writing to express my strong support for the Port Authority Bus Terminal Replacement Project. As a frequent commuter who relies on the bus terminal for my daily commute into the heart of New York City, I understand firsthand the critical need for modernization and improvement of this vital transportation hub. (83) Long overdue and very exciting. (93) We wholeheartedly support the redevelopment of the Port Authority Bus terminal as it's long overdue, and which will help in meeting the demands of the commuter public with a new state of the art terminal. We are in full support of the Port Authority Bus Terminal replacement project. (98) This is a very exciting project. I'm a Port Authority alum, and I look forward to seeing this project go forward. It's in the right place. (103) I strongly support the reconstruction of the PABT. The Port Authority should receive any and all necessary Federal, State, and Local support to do the best job possible. The current structure is such a blight to the community and a disgrace to those who use it, both New Yorkers traveling out and for commuters and tourists who arrive there. (105) I strongly support a redesign. (106) Happy to hear this news about replacement project. (107) I fully support the proposal to upgrade the bus terminal. (115) Not a fan of the current port authority. Please fix! (119) The proposal looks great. Fast track this project for everyone's sake!! (120)

Response The PANYNJ appreciates your support for this important project. Your comment is noted.

Comment Group 5 Do not do anything to the Port Authority Bus Terminal. If is fine as is. (48) This terminal may need to be updated, but I think it would be wrong to spend this much money on a public works project when there are so many people without homes in this region. Personally, I find the terminal to be functional and comfortable enough compared to others around the world. (54) It is not worth the hassle just so NYC can have another shiny new building, too much aggravation will ensue trying to work from any makeshift arrangement, please do not attempt this preposterous plan thanks. (70) The Port Authority's proposal is inefficient, expensive, and wasteful. (86) It makes less sense in 2024 than it did the last time they rolled it out in 2019. Current usage is less than 75% what it was then & the whole project hinges on the misguided notion that post Covid society will eventually return to pre-pandemic norms. There is no evidence to support this delusion. (104)

Response As described in **Chapter 1, "Introduction"** of the FEIS, the existing PABT is an aging structure with increasingly problematic functional and physical obsolescence of assets and facilities with systems that require expensive recurrent maintenance and short-term fixes. The PABT also has significant operational constraints and inefficiencies that prevent accommodating existing, as well as future, bus size, weight, technology, and volumes that will prevent meeting forecasted (year 2040) increases in bus ridership demand. The structural slabs for the existing PABT South Wing bus operating levels, critical to supporting the facility, will be functionally obsolete unless significant investments are made in the 2027 to 2037 timeframe. While ridership is recovering from the effects of the COVID-19 pandemic on travel patterns, the trans-Hudson commuting forecasts affirm the need for additional capacity beyond the existing terminal (as described in Appendix 1A of the DEIS, found in **Appendix A** of the FEIS).

Comment Group 6 This proposal, in our opinion, would improve Trans-Hudson bus operations, passenger experience within the terminal, provides for seamless passenger accessibility, and is consistent with the local and regional land-use plans. The proposed off-street bus storage and staging with direct connections to the terminal and Lincoln Tunnel reduces bus services on built and natural environments and optimizes life cycle costs. (1) The PABT must be revitalized to preserve the competence of the busiest bus terminal in the world. Furthermore, this project will support the regional economy by creating upwards of 6,000 jobs and an annual economic output of more than \$24 million. (2) The LPA for the Project would fully replace the PABT. Key features of the LPA that are important for NJ TRANSIT and our customers include: building a new main terminal with expanded bus capacity, a new ramp structures allowing for quick, direct, off-street bus access to the facility from the Lincoln Tunnel, the new staging and storage facility with charging capability, and enhanced features at the terminal including improved accessibility, general amenities, and customer access to and from the terminal. (6) The Times Square Alliance is very excited by the new proposed Port Authority Bus Terminal. It is a key transportation link to Times Square for thousands of daily commuters, tourists and residents who help boost our economy and it deserves a terminal worthy of the city it represents. The proposal promises much needed technological improvements and sustainability components that will transform the current outdated facility into a state-of-the-art marvel. (22) We applaud the Port Authority's commitment to improving facilities and conditions for bus riders in New York City and the region. We agree that the current Port Authority Bus Terminal facility is in sore need of improvement and reconstruction. The current facility is confusing to navigate, in disrepair, and far too small to meet the dynamic and growing needs of regional and intercity buses in New York. (30) The sooner this happens, without major disruption to commuters, the better. The bus terminal is antiquated and deteriorating compared to terminals in other cities and countries. It's a disaster to line up at the gates when there are more people that can fit on the platforms with lines snaking all throughout the Port Authority. The escalators are often off which is not helpful for parents, the elderly and disabled persons. (76) The current bus terminal is in dire need of upgrades. The outdated infrastructure, overcrowding, and inefficiencies not only

inconvenience commuters but also hinder the economic vitality of the region. A modern, state-of-the-art bus terminal would not only improve the commuting experience for millions of people but also contribute to a stronger and more resilient economy. (83) I am in full support of a replacement Port Authority Bus Terminal ("PABT"), in the same place, but modernized and configured to be large and flexible enough to accommodate and support all of today's and tomorrow's buses, whether they be all-electric or hydrogen powered, and single or double decker. At minimum, any PABT must be a facility where, waiting passengers can stay dry, stay warm, stay cool, sit down, eat a meal, and enjoy the use of the facilities — clean, safe, and welcoming. The PABT of the future should have beautiful, uplifting architecture, but remain functional. (103) The current Terminal is old, and not so bright. It can feel unsafe so I hope this renovation can happen so it can look a lot more modern since I know there are thousands of people that use the terminal every single day. The people deserve a lot better and will benefit for the future of the bus terminal. (123)

Response PANYNJ considers the PABT to be a critical component of the regional transportation network supporting the regional economy. The Proposed Project is intended to address the future of an ageing and obsolete facility, meet forecasted year 2040 bus ridership, improve bus storage and staging to reduce bus idling, relieve on-street congestion, and improve bus network reliability, update the technology and equipment of the PABT, and modernize services and amenities for bus passengers using the facility. The logistics of constructing the Replacement Facility while continuing bus operations for hundreds of thousands of daily travelers will require extensive outreach and coordination with the riding public, bus operators, the adjacent community and public sector partners. This planning is well underway and will become increasingly detailed as contractors are procured by the PANYNJ and specific means and methods for how construction work will be performed are developed. Please visit www.PABTreplacement.com for continued updates on project news.

Comment Group 7 The current Port Authority terminal building could then be demolished and the land used for parks, or other commercial uses. (86) The No. 7 subway could be extended to New Jersey and a new Bus Terminal could be built at a lower cost on lower priced land in New Jersey. The advantage would be that the busses would no longer need to go through the Lincoln Tunnel freeing up capacity. (86) Build the terminal as an intermodal facility in NJ with a shuttle rail line to Manhattan. This would be far more efficient, both in cost and land use, but I realize that it is not going to happen. (99) We should be getting much better design for \$10 billion. How are we not looking at comprehensive design plans, including a light rail bridge from midtown to NJ where the PA station should be. Then you could have breathing room to shut down the existing PA station to redevelop either as a connecting light rail station or alternative use. (117)

Response As described in **Chapter 2, "Project Alternatives"** of the DEIS, the PANYNJ identified 13 alternatives, which included several locations for siting of the bus terminal including a facility located in New Jersey.. The Build-in-Place Alternative (which involved the reconstruction of the bus terminal at the site of the existing PABT) was the only alternative to satisfy all of the alternative screening criteria. The Build-in-Place Alternative was therefore advanced, and subsequently modified in part to accommodate input from stakeholders, to the Enhanced Build-in-Place Alternative, which is the LPA that was advanced into the NEPA phase. As part of the Proposed Project, two below-grade sections of Dyer Avenue would be decked over to provide space for bus operations during construction and would later be converted to approximately 3.5 acres of publicly accessible open space.

Comment Group 8 MAS [Municipal Arts Society] applauds the stated goal of pulling buses off the street and reducing bus traffic and idling impact on bounding streets. (21)

Response Through the course of robust engagement with the community and local stakeholders, the PANYNJ determined that the SSF would support the project goal of reducing bus traffic on local streets. The SSF would provide bus parking and storage spaces that are directly connected to the Main Terminal, allowing buses to move between the facilities without the use of City streets. The operations facilitated by the SSF would not only reduce the number of buses using local streets for circulation (and the associated emissions and congestion) but would also improve bus operations allowing for “just in time” bus arrival and improving circulation within the new Main Terminal.

Comment Group 9 The DEIS indicates that the Port Authority of New York and New Jersey (PANYNJ) established six goals and supporting objectives to address the purpose and need of the Project. We recommend it be made clear which of the four purpose and need items correspond to each goal/ supporting objective. (5) We reiterate that the City has stated its goals for the Project: 1) that the Project must plan for all intercity buses and not only those utilizing the Project today; 2) that PANYNJ ensures no additional negative impacts to the air quality in Midtown and that the Project furthers the City’s goals of reducing air pollutant emissions; 3) that PANYNJ works with the City on a world-class facility and implement the design objectives as outlined by City and other local stakeholders, including but not limited to the integration of multiple transportation modes and the pedestrian network; 4) that PANYNJ-owned property be improved with mixed-use developments and new open space; and 5) that PANYNJ continues to engage the City and local stakeholders – both in New York City and New Jersey – in a long-term commitment to trans-Hudson planning. (11)

Response The PANYNJ shares these policy goals as stated by the City of New York and is committed to upholding the tenets of the Paris Accord. PANYNJ has continued to work diligently to incorporate or deliver these goals as the PABTR project advances. PANYNJ has worked extensively to incorporate existing and forecast demand for intercity bus service, regardless of whether the intercity service operates within the PABT today or at an adjacent curbside location. The Proposed Project offers significant advantages to accommodating the forecast growth of bus service to Midtown Manhattan when compared to the No Action Alternative. The No Action Alternative requires nearly 350 buses to find alternate locations for operations expected in 2040 and beyond. In 2040, 907 bus trips are forecast for the PM Peak Hour, and the new Main Terminal has a capacity to accommodate 1,030 bus trips forecast in the peak hour. As described in Appendix B.5, “Air Quality” of the FEIS, the Proposed Project would not result in adverse impacts to air quality, and the Replacement Facility would reduce the number of buses operating on City streets. The assessment of GHG emissions estimates that the building energy and vehicle use associated with the Proposed Project would result in the generation of up to approximately 195,494 MTCO₂eq annually. Therefore, the Proposed Project represents an increase of approximately 78,452 MTCO₂eq annually as compared to the No Action Alternative. However, although not accounted for in the GHG emissions estimates, the Replacement Facility would be designed to accommodate the use of zero or low-emission busses, which would be anticipated to greatly reduce the amount of GHG emissions associated with the Proposed Project. The PANYNJ is designing a facility that is intended to meet LEED Silver and Envision Gold, and on October 28, 2021, PANYNJ announced a new set of policies to commit the agency to the goal of achieving net-zero GHG emissions by 2050 and set a goal of cutting direct GHG emissions in half by 2030.

Pedestrian conditions would be designed to enhance pedestrian movement, safety and security of operations and the public use. Following the completion of the new Main Terminal and conversion

of the SSF from interim bus operations to storage and staging, the Dyer Deck-Overs would be converted to approximately 3.5 acres of publicly accessible open space. PANYNJ would fund and construct the open space and would coordinate with community stakeholders to determine the final programming, design, and operations. With the closure of a section of 41st Street, the south and north wing of the terminal can be joined, creating a unified at-grade space (something that doesn't exist today). The additional space also allows for the creation of a central atrium, serving as the main entrance to the terminal. The central atrium will be more than just aesthetics – it will provide line of sight and more intuitive wayfinding for terminal customers. With the addition of street-level retail, public realm improvements, and the creation of new publicly accessible open space, the Replacement Facility will be a gateway worthy of its importance to NYC.

The SSF will include approximately 65,700 gsf of street-facing retail located along Tenth Avenue between West 39th and West 40th Street.

Comment Group 10 We believe that this project could also fulfill an important role as a solution to the bus parking deficit that currently exists in downtown New York City and could be an additional solution to congestion mitigation in serving as a nexus point for intermodal transportation for interstate and intercity visitors to the City. (19)

Response The SSF plays a central role in improving bus operations, which is emphasized as a priority for the Proposed Project in both the Purpose and Need statement and the Goals and Objectives (see DEIS **Chapter 1, 'Purpose and Need'**). The SSF would provide an important improvement to the operations of the new bus terminal, while also reducing the number of buses that require the use of adjacent city streets for their operations. In addition, the Main Terminal would contain additional space for intercity buses that operate curbside in the vicinity of the existing PABT. The SSF would provide spaces for up to 350 buses to stage or park.

Comment Group 11 In the DEIS, the PANYNJ establishes six goals and supporting objectives for the LPA. See DEIS, Table ES-2, Page ES-4. Although Greyhound agrees with the list of goals and objectives. Greyhound urges PANYNJ to add one more objective under the goal of providing accessible service. See DEIS, Table ES-2, Goal #2. That is “Create a cost structure for intercity bus operators that enhances passenger accessibility to intercity bus service.” (4) In order to access intercity bus service, Greyhound's passengers need affordable transportation service. Greyhound strives to maintain the affordability of its service but can only do so if its terminal costs are manageable. Costs at the existing PABT are already among the highest in the country. In order to keep bus service accessible to the passengers of Greyhound and other intercity bus companies, future terminal costs must be reasonable and affordable. (18)

Response The PANYNJ is committed to working with bus operators to ensure its facilities remain accessible and provide a best-in-class experience to passengers of all income levels. The Proposed Project is currently in the design phase, information related to cost structure would be beyond the purview of this environmental review. The EIS is intended as a regulatory document to disclose potential environmental impacts resulting from the Proposed Project. It does not provide details or discuss business terms or financial operations.

Comment Group 12 Private development is not part of the Purpose and Need, but only a project goal and objective. It is not a necessary component to meet the purpose and need and is one of the leading causes of the adverse effect and constructive use on the McGraw-Hill NHL [National Historic Listing]. We recommend further analysis and justification on the need for the private development to fund the proposed project. (10) It would impact so many residents if you sell the land near the residential buildings to build skyscrapers which would create so much more inconvenience and eventually block our light. (121)

Response A stated goal and objective of the purpose and need is to develop a project that optimizes life-cycle costs of the new facility. Through the years of public engagement, the Project's scope nearly doubled in size. Private development, as a result, is a required component of the project's funding plan in order to fully build the Proposed Project. **Chapter 1 "Introduction,"** of the FEIS, explains the project's funding, and the need for the private development to help fund the Proposed Project. As described in **Appendix D, "Final Section 4(f) Evaluation,"** of the FEIS, the FTA determined the Proposed Project would not result in constructive use of the McGraw-Hill Building. Separately, **Appendix B.2, "Historical and Cultural Analysis,"** of the FEIS contains a new evaluation under Section 110(f) of the NHPA, which details the modifications the PANYNJ has made to the Proposed Project, the improvements of those modifications with respect to the McGraw-Hill Building, and the comprehensive shadow and viewshed analyses prepared related to potential adverse effects on the McGraw-Hill Building.

The private development includes two towers that would be built on top of the Main Terminal on the west side of Eighth Avenue between West 40th Street and West 42nd Street, the potential impacts of which are analyzed in the FEIS. Previously Tower 2 was proposed to be located on the west side of the Main Terminal (fronting on Ninth Avenue). However, in response to comments from local stakeholders and agencies, Tower 2 was relocated to the east side of the terminal (fronting on Eighth Avenue), further from the lower-density, residential portions of the surrounding neighborhood. PANYNJ relocated the tower as the easterly location would also be expected to provide better transit connections for office workers and reduce incremental shadow durations on adjacent sunlight-sensitive properties. As described in **Appendix B.2.3** of the FEIS, a shadow assessment to evaluate the potential for the Proposed Project to cast new shadows on sunlight-sensitive resources was conducted in accordance with the guidelines of the New York CEQR Technical Manual. The results of the detailed shadow assessment indicate that the Proposed Project would result in adverse shadow impacts to four historic resources containing sunlight-sensitive features. Measures to avoid, minimize, or mitigate the adverse shadow impacts associated with the Proposed Project are described in the Final Programmatic Agreement in **Appendix B.2.2** of the FEIS.

Comment Group 13 What concerns me is the wrench this project will throw into the gears of an already fraught commute many of us have to endure daily. The real problem with PABT is that there aren't enough staff and equipment to carry commuters in and out of NYC. The bus fleet needs an update, there need to be more of them, as well as more drivers. Those drivers need to be compensated better without being overworked as they are now. When you add to this the element of congestion pricing, which will force many people who currently choose to drive in onto an already overburdened bus system, this problem is likely to turn into an unmitigated disaster. It's those things I'd want addressed instead of a building makeover which is more likely to greatly exacerbate for many months what's already a commuter nightmare. (113)

Response The PANYNJ, along with NJ TRANSIT, NYMTC, and multiple commuter bus operators, have been studying the issue of trans-Hudson commuting capacity for over a decade. Concerns regarding transit operator staff, equipment and fleet capacity or readiness are a reasonable concern,

but analysis contained in Chapter 1 “Introduction” and Appendix 1.A of the DEIS (See **Appendix A** of the FEIS) show a larger and more critical problem – a growing demand (regardless of congestion pricing) for trans-Hudson commuter services, far exceeding the existing capacity of the PABT, and the existing transit system in whole, regardless of mode. Should the Proposed Project not advance, the No Action Alternative would likely occur, where capacity in the PABT would be further reduced (following 10–13 years of repair work, expected to cause significant operational changes to bus services). While the PANYNJ understands the concern that construction of the Proposed Project could disrupt commutes, the Authority will make considerable effort to minimize the disruptions and provide a terminal that will meet future demand and improve bus service efficiency and reliability. The alternative would lead to significantly more long-term disruption and inability to provide adequate services in an efficient manner.

Comment Group 14 Although it is not entirely clear, it appears that intercity bus operations will remain in the basement of the new facility with no access to the new ramp network, forcing intercity buses to continue to use city streets to get to and from the Lincoln Tunnel. See DEIS, Page 2-15, Page 9A-7. This is far from an optimal solution to the congestion problem around the PABT. Assuming our understanding is correct, we urge the PANYNJ to look at, and adopt, an alternative plan that will provide intercity buses direct access to the Tunnel without having to traverse city streets. (18) We believe that these goals fail to properly address the Port Authority Bus Terminal’s vital role as New York City’s primary intercity bus terminal. Therefore, we propose that the additional goal of “Improve intercity bus operations” be added to this list, with the objectives to “(a) provide direct linkages to the Lincoln Tunnel portals, (b) improve linkages to alternative entrances and egresses to Manhattan, (c) accommodate more intercity bus service, and (d) accommodate intercity bus service currently serving other facilities and curbsides in Midtown Manhattan.” The new Port Authority Bus Terminal must not simply be a more beautiful, comfortable, and accessible station. It must expand to reflect the increased demand and need for intercity buses, in addition to accommodating the current levels of intercity bus service occurring on the curbsides and parking lots of Midtown Manhattan. (30)

Response The Proposed Project improves intercity bus operations in several ways, including moving some curbside intercity bus operators to gates within the terminal, increasing integrated storage and staging operations at the SSF, and accommodating larger buses and new bus technologies. PANYNJ identified intercity bus services that are currently permitted to operate at curbside locations in the vicinity of the PABT (from Eighth Avenue west to Eleventh Avenue and south to the Javits Convention Center) and evaluated the opportunity to accommodate these buses within the new terminal. Based on discussions with those operators, PANYNJ has included additional gates to accommodate those curbside intercity operations in an integrated Replacement Facility. The enhanced Build-in-Place alternative also improves reliability of bus operations through provision of integrated storage and staging operations at the West Adjunct (now referred to as the Storage and Staging Facility or ‘SSF’). Integrated storage and staging would allow buses to enter Manhattan outside of peak hours and wait (stage) directly adjacent to the terminal until going into service. The Replacement Facility’s ramp structure will provide direct connections between the Main Terminal and the Lincoln Tunnel, allowing all buses (commuter and intercity) to operate without using local city streets. The entire Replacement Facility (ramps, SSF, and Main Terminal) have been sized to accommodate larger buses, including double-decker buses increasingly used by intercity carriers. This would, in addition to an increase in gates specifically for intercity buses, allow an increased use of the Main Terminal by intercity buses.

The Proposed Project does provide access for intercity buses directly from the Lincoln Tunnel to the SSF and new Main Terminal without the need to use city streets. Clarifying language has been added

to **Appendix B.4 “Transportation”** and **Appendix B.4.1 “Bus Services”** to clarify the design and operations.

Comment Group 15 While the Port Authority Bus Terminal plays a critical role in New York's transportation network, the currently proposed replacement facility is oversized and would lock the region into suboptimal service for decades to come. Undoubtedly, the terminal anchors a heavily patronized transit system. However, the planning that has taken place has ignored the rest of the network and risks mispending billions of dollars as a result. In many cases, commuter buses serving Midtown take longer than the parallel trains. Currently, Elizabeth is 32 minutes from Penn Station by train and a 47-minute bus ride away from the Port Authority Bus Terminal. Already, peak frequency on many rail lines is high enough to support bus-rail connections at key stations like Rahway, Metropark, Summit, Elizabeth, Newark Penn, Newark Broad Street, and Secaucus. Rail trip times and frequencies can be expected to become more favorable as the Gateway Program improves the NEC. (63)

Response A multimodal analysis reviewed non-bus modes that would theoretically help meet growing commuter demand. However, it was determined through initial analysis that none of these other modes would sufficiently meet demand from bus passengers, leading the PANYNJ to proceed with study of a replacement bus terminal. A conclusion from the Trans-Hudson Commuting Capacity Study (2016) was that increasing rail service could lead to a modest reduction in bus demand at the PABT (10 to 20 percent) many other communities do not have access to the rail network, making improvements to bus services their only effective transit option. PANYNJ initially considered a total of 13 alternatives to the Proposed Project and applied a two-part preliminary screening process to those 13 alternatives. Any alternative that did not meet a minimum threshold of providing capacity for forecasted peak hour arriving and departing buses was considered fatally flawed and would not meet the purpose and need for the project. Any alternative that required substantial acquisition of private property was also considered to be fatally flawed. The three remaining alternatives were then screened using evaluation criteria shown in Table 3-4 of the PANYNJ Bus Terminal Replacement – Final Scoping Report – Appendix D. There were extensive comments on these three alternatives and overall comments approved of the Build-in-Place Alternative. New York City local elected officials also strongly supported the Build-In-Place Alternative.

While NYMTC plans to adopt an updated demographic outlook in 2024 and shifts in the region's population and employment growth patterns will impact growth at major commuter hubs like the bus terminal, there are few markets in the metropolitan area where rail and bus services are directly competitive, so housing growth in an area well served by rail transit would likely have little effect on bus ridership levels, and vice versa.

Comment Group 16 NJ TRANSIT has serious reservations if the adoption of the “No Action Alternative” becomes necessary. Under the No Action Alternative, as described in the DEIS, the minimal repairs mandated for the current terminal would significantly decrease bus capacity below existing levels. Such a reduction would negatively affect daily bus operations and would deteriorate service for NJ TRANSIT passengers. Furthermore, implementing on-street bus operations in Manhattan would be challenging, negatively affecting our customers, and exacerbating traffic congestion in the vicinity of the current bus terminal. (6) We agree with the EIS's assertion in Chapter 3 that the No Action Alternative would not support Federal, State, and Local policy goals, nor address the very real needs of this facility, this industry, and the traveling public. Not acting to

improve this facility would be a major disservice to the people of this region, as the facility will fall further into disrepair and the industry needs will continue to grow. (30)

Response Based on the analysis in the FEIS, the PANYNJ agrees that the No Action Alternative does not meet the purpose and need and the anticipated future demand for bus services. Therefore, PANYNJ recommends the Preferred Alternative.

Comment Group 17 Because the PABT plays such an important role in the national transportation network, even beyond its local importance to the New York and Tri-state area, it is critical for the development of this project to account for the needs of a multitude of interests, not only in terms of transportation services, but also in terms of environmental sustainability and supporting equitable access for rural, underprivileged and minority communities. (19)

Response PANYNJ has been and will continue to be committed to a more sustainable future and has established agencywide policies that dictate the PANYNJ follow global best practices regarding sustainability. Public transportation and its ability to provide access to jobs, education, and critical services plays a major role in ensuring that all communities regardless of socio-economic status can access opportunities which otherwise would not be accessible. The facility itself will be a more sustainable one. PANYNJ policy requires construction projects greater than 1,000 sf to adhere to PANYNJ's Sustainable Building Guidelines.¹ Section 3.4.2 of the Sustainable Building Guidelines indicates that the appropriate target LEED rating for a new construction project of greater than 20,000 gsf is LEED Silver. The PANYNJ is designing a facility that is intended to meet LEED Silver and Envision Gold.

The facility was designed to improve bus operations and customer conditions for both intercity and commuter services. The PANYNJ expanded the capacity to handle intercity bus demand by adding 40 gates dedicated specifically to intercity bus service.² Other operational improvements of the Proposed Project – including storage and staging space within the SSF and direct off-street connections between facilities (SSF and Main Terminal) and to the Lincoln Tunnel – benefit both bus services.

Operationally, the future condition will also support sustainability. The Replacement Facility would be designed to accommodate all-electric bus fleets and other emerging alternative technology fleet types and adopt design features and technology to drive toward net-zero to the maximum extent practicable. The design of the Replacement Facility would provide for the installation of electric charging infrastructure to support the conversion by carriers to electric buses. Two decks over below-grade portions of Dyer Avenue and the Lincoln Tunnel Expressway would be constructed to facilitate construction-period bus operations. These “Dyer Deck-Overs” would be converted to publicly accessible open space follow completion of the Replacement Facility. The SSF will help reduce vehicle miles traveled on city streets. Buses will be able to minimize the number of operationally wasteful vehicle miles traveled over-all because of this additional project component. Through the creation of new open space, and investments in green infrastructure, the Replacement Facility will better support the communities which rely on it in a more sustainable manner.

¹ <https://www.panynj.gov/port-authority/en/about/Environmental-Initiatives/clean-construction.html>

² The 40 gates specifically provided for intercity bus services in the new Main Terminal results in an approximate doubling of gates provided for intercity buses compared to existing conditions in the PABT. The exact number of existing gates specifically for intercity buses is difficult to quantify as buses may load or unload passengers at different gates, may stage at gates, or the same gate may be used by different types of bus services within the same day.

Comment Group 18 Significantly reduce air pollution in relation to the PABT Replacement Project, and surrounding transit infrastructure (Dyer Ave/Lincoln Tunnel access) through programmatic and design means. MCB4 ranks 3rd worst in air quality out of 59 CDs largely due to transit infrastructure (PABT, Lincoln Tunnel Access, bus/vehicle traffic). PABT replacement plan addresses community request to remove commuter & inter-city bus traffic from surface streets, removing idling buses at curbside, and (hopefully) reducing surface street traffic around terminal. (116)

Response On October 28, 2021, PANYNJ announced a new set of policies to commit the agency to the goal of achieving net-zero GHG emissions by 2050 and set a goal of cutting direct GHG emissions in half by 2030. That announcement also indicated PANYNJ's intent to establish a net-zero vision for the PABT replacement. The Replacement Facility would be designed to accommodate all-electric bus fleets and adopt design features and technology to drive toward net-zero to the maximum extent practicable. The design of the Replacement Facility would provide for the installation of electric charging infrastructure to support the conversion by carriers to electric buses. Lastly, by providing direct connections for buses from the Lincoln Tunnel and between the SSF and Main Terminal, the Proposed Project will remove buses from adjacent city streets, reducing congestion and the commensurate emissions. The FTA and PANYNJ performed Air Quality analyses that determined the Proposed Project would not result in significant adverse air quality impacts. The Replacement Facility would reduce vehicle-miles-traveled (VMT) by reducing the need for buses to return to off-site facilities in the mid-day through the provision of the SSF. The new Ramp Structure would connect all facilities with off-street circulation (via the ramps) removing the need for buses to use local streets for circulation (as under existing conditions) which both adds to local congestion and local emissions and lowers reliability of bus service.

PROPOSED PROJECT

Comment Group 19 We commend the Port Authority not only for listening to feedback and developing the LPA but also for working with the City to arrive at a funding agreement that will make all of this possible. The City's and the Authority's investment will ensure that this terminal will reap benefits for generations to come. (4) We remain skeptical of the role played here by private development funding public infrastructure and continue to wonder exactly how the specific heights proposed for these private developments, which create shadows on McGraw Hill and block views of the buildings from the street, correlate to specific revenues for the project. We request that PANYNJ offer a clear outline of why these tower heights are necessary to fund the project. (26) We still maintain that Consulting Parties must be able to review an analysis of this undertaking's funding. We have yet to see any evidence showing that a new bus terminal can only be constructed contingent upon income from commercial towers. All of our comments on this project should be viewed under the assumption that a financial analysis would indeed prove the necessity of the towers. (33) Is there is a Plan B for financing if the current market continues? Do we really need more office towers built when there is already a glut of them? (46) Part of the funding for the new structure was to have come from selling air rights to build office towers on 41st St between 8th and 9th Avenue. Is this funding already in hand? If not, this a realistic goal given that the commercial real estate market has collapsed? If there are no takers before the start of the project, will the PABT project still begin by next year? And if there are still no takers in the coming years, is there a danger the reconstruction halts mid-way, ending up with an eyesore that is half torn down and half re-constructed, not to mention the untold disruptions to businesses, residents and commuters? (78) My concern is whether the project will be completed fully given that funding is dependent on selling air rights to commercial builders, and commercial, you know, builders now, as you, I'm sure know, are not very eager to put up new buildings considering that there's a lot of vacancy in the -- in Manhattan. So, what will happen

if you have funding from governmental sources to begin the project, and demolition takes place, and the staging -- the staging buildings are built, et cetera, and perhaps there is a part demolition, but then later find that there is no taker for the -- for wanting to buy the air rights to build the two towers? What will happen then? (80) I'm concerned that the two proposed office towers, with the objective of generating construction & operation income for the new bus terminal may be an albatross. The nature & needs for office space have changed dramatically since the pandemic & the old formulas may not work. The conceptual drawings offered fail to clearly indicate the towers' service infrastructure (plumbing, electrical, HVAC, elevators, stairwells) penetration of the terminal & the resulting loss of bus handling & passenger access spaces as well as layout flexibility for bus operators (i.e. none). The schemes project significant on street retail - which while ideal ignore the current dramatic shrinkage of "brick & mortar" shopping with the vacuuming up of purchasing power online. (100) The biggest challenge facing this project, even bigger than the challenges design engineers are now facing — is avoiding the shrinkage of the vision through value engineering that reduces it to crap. I worry about that now because the scoping document flags the fact proposed financing mechanisms are tenuous, even speculative, warning that what can be built will likely be scaled back. One thing that does concern me about the project is the financing. And that, with respect to the pilot, and the speculative office tower, it really needs to be addressed. The pilot depends upon another party that the Port Authority doesn't have any control over agreeing to hand over funds and the partners financially in this new building. And we need to see some reassurances that that politically, is going to fly because so much of this project depends upon that revenue stream. (103) PABT has less than 1/10th their proposed budget & are relying on major sky scraper office buildings to pay for everything despite existing buildings remaining vacant throughout the city because people work remotely now. PABT says it's 'too soon' to have their financing in order & 'too soon' to show us designs or even renderings of what this monstrosity will look like beyond 2 AI generated glamour shots of the main terminal. How can that possibly be when they've had decades to prepare? How can they possibly be permitted to go forward when they don't have anything sorted?! How do you justify moving forward with such a huge disruptive project without the funds or support from the local community?! (104)

Response Additional information about the funding strategy for the Proposed Project has been incorporated into **Chapter 1, "Introduction,"** of the FEIS. The PANYNJ initially proposed a replacement alternative which, as a result of input from the City of New York and community stakeholders during the public engagement process, increased in scope and cost (examples include additional capacity of intercity buses and the addition of public open space). The funding expected to be generated by the private development is needed to incorporate the additional scope which responds to these requests. Subsequent to the publication of the DEIS, the PANYNJ and the City of New York reached an agreement around the contribution of tax benefits associated with Payment in Lieu of Taxes (PILOTs,) agreements, following the model of the Empire State GPP successfully utilized in the construction of Moynihan Train Hall at Penn Station. The PANYNJ has sought additional financial assistance from the FTA and other government sources to make the Proposed Project fiscally practicable.

The DEIS includes analyses on the potential impacts of the private development towers that would be constructed on top of and physically integrated with the new Main Terminal (which would contain the foundation and elevator banks for the towers). As described in Appendix 6C, "Urban Design and Visual Resources," of the DEIS (see **Appendix A** of this FEIS), PANYNJ evaluated the potential effects of the Proposed Project on urban design and visual resources in the surrounding area. PANYNJ used current as-of-right Zoning to establish a maximum potential development envelope for analysis purposes of potential impacts in the EIS. Determination of the massing and height, and any potential impacts, of the private development towers is consistent with the "reasonable worst-case

development scenario” approach in the CEQR Technical Manual. PANYNJ will continue to evaluate the massing of the private development sites in consultation with NYCDP.

The EIS provides conceptual level designs depicting how the private development would be integrated into the Replacement Facility, without compromising terminal operations or capacity. The EIS is a regulatory document and would not provide detailed designs of building systems such as plumbing, or electrical systems. Retail, particularly at street-level locations is incorporated into the Proposed Project, in part, at the request of the community, with the intent of activating the streets adjacent to the Replacement Facility.

Comment Group 20 Something I would like to see as part of the project is money from the commercial leasing and air rights to go into a continuous funding source to be shared amongst the Port Authority & NJ Transit. I feel it is very important that the opportunity to have a long-term and sustained revenue source from private enterprises who would like to occupy the office & retail spaces leased to them be usable for NJ Transit to continue to serve communities in the city and NJ. A one-time payment for air rights may be a large windfall now but may not be the best approach for the long-term financial health of transit here in the NY Metro Area. (58)

Response The DEIS is intended as a regulatory document to disclose potential environmental impacts resulting from the Proposed Project. It does not prescribe any revenue sharing agreements.

Comment Group 21 The DEIS should further describe efforts to work with social services organizations to transition unhoused people currently using the PABT. EPA suggests development of a community plan outlining these and other community related efforts. EPA recommends the plan cover any requirements to access social services such as shelters or temporary housing and how information will be disseminated among those who may benefit from social services. (5) The area currently experiences a great deal of street homelessness, including congregation under sidewalk bridges which has created a public safety problem both for the homeless individuals, community residents, and the public. A social service and enforcement plan must be put in place to ensure public safety for community residents and homeless individuals. (15) The Port Authority must also provide a designated space for a drop-in center accessible from inside the station for the unhoused population currently residing at the terminal. It will be crucial to ensuring that critical needs of the local community are met as we design future-oriented infrastructure. (22) Especially needed is the restoration of the Project Find Coffee House that used to be under the bridge across 9th Avenue. This has left a community of vulnerable and aging people with mental illness and substance abuse disorder to roam the bus terminal and surrounding streets without adequate help or support. Many stand all day in the terminal with nothing to do and nowhere to go. They are not allowed to sit down. I urge the PABT to increase social outreach to this cohort now and help them get into supportive housing, as the construction process will displace them. I also urge PABT [sic] to include and expand social support for similar populations who will no doubt be part of the life of the new facilities as well, again with a view to getting them into supportive housing. (75) Social service organizations currently provide services within PABT. As discussed in Appendix 3B, “Community Facilities and Services of the DEIS (see **Appendix A** of the FEIS), the surrounding area contains several supportive housing, homeless shelters, and social service facilities. PANYNJ will continue to provide outreach and referral services to individuals experiencing homelessness at the PABT and the New York side of the Lincoln Tunnel during construction. Additionally, assistance programs currently offered by social service organizations serving the PABT include access to detox programs, shelters, drop-in centers,

and travel assistance in specific case needs. These programs would continue to be available throughout the duration of the development of the Proposed Project.

Comment Group 22 The community members gathered at Metro Baptist on the night of April 18th spoke with one voice: this would not happen again. To its credit, the Port Authority listened. The project will not use eminent domain. The new terminal and storage facility and ramps would be constructed entirely on Port Authority property. The community also insisted the neighborhood, east to west, north to south, be knitted back together, with Hell's Kitchen north and south of 42nd Street connected once again by its Main Street — Ninth Avenue — as it had been when the historic Paddy's Market, stretching along the Avenue from 35th to 42nd Streets, served a vital and thriving community. The western part of the Project is located in an area zoned for residential use. Half of the Project's buildings are closely intertwined with residences and historical structures: some of the Project's buildings are six inches from existing occupied, residential tenements. MCB4 is dismayed that the conclusion of many sections of the DEIS states that there are no significant impacts on the area's characteristics and resources. For example, the replacement of bus ramps over Ninth Avenue with an expansion of the terminal building with bus gates is simply not the same visual resource as currently exists. It is a completely different one. (15) It does nothing to mitigate the sight lines and out of place presence that these giant blue structures will be. The project as it stands makes no effort to fit into the neighborhood where it already does not -- we already do not, but also piece the community is going to tear apart within the next 8 to 10 years. (49)

Response As noted in the DEIS, Appendix 6C, "Urban Design and Visual Resources", PANYNJ conducted a thorough evaluation of potential visual impacts that may be caused by the Proposed Project. The PANYNJ has made siting the Project within its own property and avoiding the use of private property a priority in planning for this project. The Replacement Facility, like the existing PABT, must still integrate into a neighborhood and the Proposed Project intends to maximize bus operations and efficiency and wherever possible, serve to restore links to the community physically divided by the original facility. With a series of public realm enhancements, including wider sidewalks surrounding the Replacement Facility, new street-level retail and the creation of new publicly accessible open space, the PANYNJ has advanced a design that is intended to better integrate into the neighborhood and serve as an amenity to residents, workers and visitors to the area. In addition, as depicted in Figure 2-10 of Chapter 2, Errata Table of DEIS Revisions, of the FEIS, the Replacement Facility would provide street-facing retail space along Ninth Avenue. The addition of street-facing retail space along Ninth Avenue would improve pedestrian activation within the corridor, and the increased height of the street wall would align with the buildings on the northwest corner of Ninth Avenue and West 40th Street, within the Paddy's Market Historic District.

Comment Group 23 We question the adequacy of the number of bus slips to accommodate existing levels of intercity bus service, much less the inclusion of curbside operators. The DEIS projects 40 bus gates for intercity bus arrivals and departures after the Replacement Facility is fully operational and up to 2040. See DEIS, Page 9A-22. This is a 17% reduction from the approximately 48 gates that are used for intercity bus service today. But we doubt that 40 gates are sufficient to accommodate existing operations, much less provide for future growth, either through expansion by existing PABT operators or by the addition of former curbside operators. There needs to be more clarity with regard to the curbside operations that are intended to be accommodated in the Replacement Facility. The DEIS Executive Summary states that one of the enhancements of the build-in-place alternative is intended to be "new capacity...to accommodate intercity buses that currently pick-up and drop-off at curbside locations on City streets in the vicinity of the existing Bus Terminal." See DEIS Page ES-11. However, the DEIS Appendix paints a more modest picture. It states that the proposed capacity "could shift some intercity bus service from curbside locations along nearby streets into the terminal...(See

DEIS, Page 9A-3), and adds that “a portion of” curbside operators in the vicinity of the terminal is “expected” to be accommodated in the new facility. See DEIS Page 9A-7. Greyhound believes that all curbside operators in the vicinity of the PABT should be required to be tenants in the Replacement Facility. A clear establishment of public policy (with NYC DOT’s cooperation) within the defined “vicinity” will ensure equitable economics for the ICB carriers operating in the area. This is also important to supplement New York City’s midtown congestion reduction efforts; to ensure safe bus operations; and to provide all bus passengers a convenient, centralized location with access to the City’s transit hub. We would define “vicinity” to be the same CBD used for congestion relief charges including the West Side Highway. The final EIS should identify the area within which curbside operations must move to the Replacement Facility so that it can be sized to accommodate those operations plus anticipated future growth. (18) We also think that inventories of intercity commuter bus operations throughout the city should be considered, but we do believe that the (unintelligible) slots estimated for enter bus use have been underestimated with the 40 that is part of the plan. We do believe that at least 60 should be necessary. Partly when we look at the interstate bus permit for the curbside options for interstate transportation, there is a significant number of operators we [who] seem to have not been considered for integration into the Port Authority-- the future Port Authority Bus. We know there are at least 35 operators that are on the curbside today with permits who would fall into that category. And it's hard to imagine only 40 slots, including those current curbside operator[s] as well as the inter-city bus tenants that already exist over the next 16 years through 2040. (19) We are concerned that there is inadequate space and plan to make this a reality. The DEIS Appendix states that the proposed capacity “could shift some intercity bus service from curbside locations along nearby streets into the terminal. (See DEIS, Page 9A-3), and adds that “a portion of” curbside operators in the vicinity of the terminal is “expected” to be accommodated in the new facility. (See DEIS Page 9A-7). To achieve this community goal, FlixBus believes that all curbside operators in the vicinity of the PABT should be required to be tenants in the Replacement Facility, as long as they are offered reasonable access and an expedited, fair, and feasible process to be welcomed into the facility. This requirement is necessary to supplement New York City’s congestion reduction efforts; to ensure safe bus operations; and to provide all bus passengers a convenient, centralized location with access to the City’s transit hub. We would define “vicinity” to be the same CBD used for congestion relief charges. The EIS should identify the area within which curbside operations must move to the Replacement Facility so that it can be sized to accommodate those operations plus anticipated future growth. (30) Coach USA which utilizes currently 21 slips/gates, be afforded that many and allowed the opportunity to expand to meet growth with additional slips/gates in the future. (98) Also very important is the facility’s being able to bring all intercity buses back inside the confines a bus station — where they belong. And for intercity buses, we really need to make sure that it has the capacity to get all of the on- street bus loading into a bus station, which is where it belongs. The ground floor design dedicates entirely too much space to private party interests (tower lobbies). The presence of these tower lobbies chokes off access to the 8th avenue and inhibits north and south circulation which is the vital pedestrian flow. I’ll add that the size of the lobbies and number of elevators seems excessive for the mass anticipated. I would urge the PANYNJ to work with partner developers to reduce this dramatically and allow riders to exit the facility at street level on all three sides along Eighth Avenue. (103)

Response As discussed in DEIS, Chapter 2, “Project Alternatives” and Appendix 9A, “Bus Services,” (see FEIS **Appendix A**) the new Main Terminal would provide approximately 182 bus gates with four bus levels for commuter services and one for intercity services. The intercity bus level would feature 40 bus gates for a mix of arrivals and departures. Although, the Proposed Project will include 40 gates exclusively for intercity bus operations, intercity buses are not limited to those 40 gates. Intercity buses will be able to use the commuter bus gates during non-peak periods (commuter bus services and intercity bus services has different peak periods for travel, allowing resources to be

shared or reallocated to better match supply with demand). PANYNJ studied intercity bus services that currently operate at curbside locations adjacent to the PABT under existing conditions to inform the amount of intercity bus gates to provide and believe that the current number of gates, plus the ability to use all gates across the terminal during off-peak hours will meet current and future needs of the intercity bus market.

Further, the Replacement Facility will allow for more efficient operations, allowing bus time at gates to be reduced. Under existing conditions there is extremely limited staging or storage space within the terminal, requiring buses to stage on city streets. This results in buses being delayed in reaching a gate (and accordingly, that gate being “held” for the incoming bus, and though empty, not available for other buses). Direct, off-street connections between the SSF and Main Terminal would address this issue, along with a design for bus gates that allow a circulating bus to maneuver around another bus at a gate or in the process of navigating into a gate.

The PANYNJ expanded the capacity for of intercity bus services in response to community concerns over the volume of curbside bus activity in the area around the PABT. While the PANYNJ can provide the capacity to accommodate intercity buses to operate within the terminal, it cannot compel bus operations to take place only within the terminal, nor can it restrict any bus operations from taking place on city streets surrounding the PABT.

Lease agreements or other business activities between the PANYNJ and private bus operators are outside the scope of the EIS.

Comment Group 24 Although ABA [American Bus Association] is pleased FTA and the project sponsors developed a concept that includes motorcoach parking or layover, termed “storage” in the proposal, we do not think that it maximizes the potential benefits that a reconfiguring of this plan could offer to PABT and to the overall New York City congestion mitigation efforts. With more than 300 spaces planned to be available for parking in the DEIS, just making a small fraction of the total with 30-50 of those spaces available for metered or timed motorcoach parking by charter buses or shuttle buses looking to layover while in the City. Incorporating paid motorcoach parking, will make the PABT the motorcoach destination point and will allow for better incorporation by visitors to the Metropolitan Transit Authority’s system as well as other city services. We also would like to see Charter Bus parking considered in the plan overall. There are already parking facility contractors utilized at Port Authority Bus Terminal for car parking. You can utilize the same contractors for facilitate Charter Bus parking. (19)

Response Bus storage and staging is an important aspect of the existing and future PABT operations. The existing terminal provides approximately 50 spaces in the North Wing for midday bus storage. Following the completion of Phase 2 and the opening of the new Main Terminal in 2032, the SSF would be converted from an interim bus terminal to long-term use for bus storage and staging, providing storage for up to approximately 300 to 350 buses. With the addition of the SSF, the Replacement Facility would minimize the number of empty bus trips through the Lincoln Tunnel, reduce on-street bus movements, and optimize the Main Terminal operations during the PM peak period. The intent of the investment in the Replacement Facility, and the provision of storage and staging within the SSF is to assist bus operators providing service to the new Main Terminal. While it is anticipated that this has a positive effect on local traffic conditions around the terminal, it is not intended to address bus parking demand citywide, which is not a part of the purpose and need for the Project, as described in Chapter 1, Introduction, of the FEIS.

Comment Group 25 How will the FDNY Engine 34/Ladder 21 located on West 38th Street function in this context? Considering that the base traffic model vastly underestimates the current congestion and the fact that no real mitigation is proposed, the district will be facing an epic gridlock for most of ten years. Should the fire station be relocated? (15)

Response There are not currently plans to relocate FDNY Engine 34/Ladder 21. The PANYNJ has coordinated and collaborated with the FDNY about the design of the Replacement Facility, and will continue to coordinate regarding construction conditions and operations following completion of the new facility. Construction MPT plans will maintain access for emergency services as well as access to fire hydrants and building standpipes. The traffic volumes were generated by traffic counts conducted in 2019 (pre-COVID) and updated with additional counts conducted in 2021 and 2023. These counts, and any subsequent modifications to respond to COVID-recovery conditions and planned street modifications were developed in coordination with NYC DOT. Mitigation for traffic impacts identified during construction of the Proposed Project are extensively detailed in **Appendix B.7 “Construction”** of the FEIS. There are no plans to relocate any emergency services.

Prior to the start of construction, the PANYNJ would implement a Traffic Management Center to track real-time conditions of bus service as well as surrounding street conditions and update operators, motorist, and construction managers. The PANYNJ will also create a comprehensive Traffic Management Plan which will coordinate phasing of construction and specific MPT plans. Collectively, incorporation these series of best-practices would be expected to help alleviate traffic congestion and reduce additional delays which may be anticipated to occur during the project’s construction. The PANYNJ intends to make all practicable efforts to mitigate any traffic conditions which may result during changes to the area streets required for construction activities. Multiple mitigation efforts were developed and evaluated for a variety of construction stages. Traffic mitigations that were modeled included adjustments to signal-timing, parking restrictions or removals, limiting turning movements to reduce traffic conflicts, and restricting specific streets to limited vehicles (e.g., construction, bus, or emergency access only). The PANYNJ will consider the most effective deployment of PAPD officers, Traffic Enforcement Agents, pedestrian-managers (crossing guards), and construction flag people to manage safety and minimize traffic delays. All potential mitigation efforts would be in addition to best practices the PANYNJ intends to implement to reduce or minimize effects resulting from construction of the Proposed Project.

Comment Group 26 Please describe the waste management practices and processes around the CHDC buildings given their adjacency to the main construction zones. Please describe how construction will impact deliveries to commercial tenants and how PANYNJ will ensure no disruptions occur. Please describe how the increased levels of traffic and potential road closures will impact residents, pedestrians and commercial tenants especially in relation to ambulances, Access-A-Ride, taxi and car services, and grocery delivery. Please describe when and if any compensation will be provided to residents of CHDC properties when access to their buildings or apartments is limited or inaccessible. (23) What will the provisions be for safe loading and unloading for direct services provided by Metro/RMM during construction? What compensation will be provided to residents of Metro when access to the building is limited or inaccessible? How will Metro/RMM social service clients be protected as they often arrive early and wait for our doors to open? Our concern is that these services may be at risk of disruption and/or loss due to impacts from the new Bus Terminal Project. In addition to the many impacts already mentioned in previous sections of this letter, these programs depend on sidewalk access to the building, both pedestrian access and curbside access for

deliveries. (32) My residential building has a service entrance on 41st St near 9th Ave. Please ensure continued access to this entrance for delivery vehicles. (69)

Response Goal 4, Objective e, states PANYNJ's intention to "minimize impacts to local community during construction." During the entire duration of construction for the new main Terminal (anticipated duration of four years), West 41st Street between Ninth Avenue and Eighth Avenue would be closed to both pedestrians and public traffic, with limited access for tenants, deliveries, construction, and emergency services maintained. The PANYNJ intends to maintain access to all residences, businesses and properties \during the period of construction to the extent practicable and feasible. Should an interruption in access become required due to construction activities, PANYNJ will coordinate with property owners/residents in advance and seek to minimize the duration of the access interruption. A comprehensive Traffic Management Plan (TMP) is being developed to address vehicular, pedestrian, and local business impacts during construction and provide regular updates to the community, businesses and area stakeholders. The analysis of construction impacts will evaluate reasonable worst-case conditions associated with the busiest period of each construction period in relation to on-going operations. Additionally, PANYNJ will coordinate with City agencies and local stakeholders throughout the duration of the construction period to share information on the construction schedule and progress and to solicit input from stakeholders on measures to minimize impacts to the surrounding community.

Comment Group 27 The report notes that construction will be finished by 2032 but the parks will be open for use in 2040, a full eight years after completion of the bus terminal and a full 16 years after commencement of the PABT Replacement Terminal Project. Current timeline is unacceptable. Please clarify why there is an eight-year gap. Design, funding, and procurement processes for Dyer Avenue public open green spaces should occur concurrently with construction of PABT replacement project so that construction on the green space may commence immediately after the Port Authority is finished using Dyer decks for bus staging during terminal replacement construction process. (15) Phase 2 will be completed by December 2031. Why is the completion date for the green space 2040? (27) Concurrently design, fund and engage in any necessary procurement processes for Dyer Ave public open green spaces during construction of PABT replacement project so that construction on the green space may commence immediately after PA is finished using Dyer decks for bus staging during terminal replacement construction process. Current DEIS projects park completion in 2040, a full 8 yrs. after completion of the terminal, a full 16yrs after commencement of PABT replacement terminal project. Current timeline is unacceptable, please adjust schedule to commence physical work on green open space (Dyer staging area decks) upon completion of replacement terminal when staging area is no longer needed for bus storage. (116)

Response The Dyer Deck-Over conversion to publicly accessible open space cannot begin until at least 2032. The DEIS and **Appendix B.7 "Construction"** of the FEIS explain that the conversion to publicly accessible open space atop the Dyer Deck-Overs will not begin until 2032. From 2028 – 2032 the decks will be used for interim bus operations, required since the new Main Terminal will be under construction and the SSF (in use from 2028-2032 as an interim terminal) will lack sufficient capacity to accommodate all forecast buses in the peak hour. The FEIS does not say that it is not possible that the future open space could be built and operational before 2040 but assumed that it would compete by 2040 for the purposes of analysis (2040 is the Proposed Project's Build Year, by which time the project is assumed completely built and occupied, as well as the future bus demand – 2040 - to be realized). As the Proposed Project evolves and advances, the PANYNJ will be developing plans and a schedule for the design, construction and operation of the future public open space.

Comment Group 28 In terms of construction and operation, please provide details (i.e., demolition/construction recycling, materials, HVAC systems, lighting), on how the facility will achieve LEED Certification higher than v4 Silver (as we encourage higher than baseline) and meet Local Law 97. (21)

Response PANYNJ policy requires construction projects greater than 1,000 gsf to adhere to PANYNJ's Sustainable Building Guidelines. While not required to achieve full certification, PANYNJ encourages projects to follow United States Green Building Council (USGBC) LEED guidelines. Section 3.4.2 of the Sustainable Building Guidelines indicates that the appropriate target LEED rating for a new construction project of greater than 20,000 gsf is LEED Silver. In addition, PANYNJ is committed to adhering to NYC's Local Law 97 which requires that all buildings larger than 250,000 sf to meet specific energy efficiency and GHG emissions limits. Please note that the DEIS is intended as a regulatory document to disclose potential environmental impacts resulting from the Proposed Project. It is not intended to cover all technical work, including the specific details on how the facility will achieve LEED Certification and meet Local Law 97 as much of this is under active development.

Comment Group 29 We commend the Port Authority for choosing to voluntarily conform with the City's Zoning Resolution to ensure the proposed project is compliant with local zoning. We look forward to reviewing any applications submitted by the Port Authority for public review. We hope that the Port Authority follows through on its intention to conform to zoning for approvals including a special permit for new bus stations for ten or more berths to modify use and bulk regulations, as well as potential approvals for the partial closure of 41st Street and for ramps over public streets or City property. (4) The City would like more detail on the how all the permitted FAR, bulk, and design with the proposed actions will be accommodated on specific lots. (11)

Response As a result of coordination with the NYCDP, the FEIS now contains details of the discretionary land use actions to facilitate the project through the City's ULURP. The three actions that the PANYNJ is seeking approval for are:

1. A Zoning Text Amendment to Section 74-145 removing parking requirements for bus terminals with ten or more berths;
2. Zoning Special Permit pursuant to Section 74-145 – modification to bulk requirements to allow for the Proposed Project; and
3. Change in City Map demapping portions of 41st Street and conveying to the PANYNJ.

Full details on the Land Use actions associated with the Proposed Project can be found in Appendix B.1 "Land Use" of the FEIS.

Comment Group 30 What will the east side of 9th Avenue between West 41st and West 40th Streets look like? A rendering should be created in the final EIS. (27) There is no rendering showing what the condition will look like underneath the 10th Avenue overpass. Please create a rendering similar to figure 6C-19 for the 10th Avenue overpass. (27) The DEIS makes a great effort to illustrate the street views related to the new PABT structures. However, there is only one view provided illustrating the impact on West 40th Street. Will the final EIS include renderings of West 40th Street looking east from Dyer Avenue and 10th Avenue? (32) Why haven't we been shown plans & renderings of the storage & staging building that's supposed to serve as the temporary terminal? What will it look like? Where will commuters enter/exit? What effects will this have on local

residents? You keep talking about increased storefronts; are locals going to be swarmed with increased foot traffic? (104)

Response **Appendix 6C, “Urban Design,”** of the DEIS provides a range of figures, photos, renderings, and illustrative massing diagrams of elements of the proposed project. Figures 6C-14 and 6C-15a provide illustrative massing diagrams, which show conceptually from a bird’s eye view how the main terminal building crosses over Ninth Avenue above the street level in the block between West 40th Street and West 41st Street. Figure 6C-17c comes closest to answering the comment. It shows an illustrative massing diagram of the Ninth Avenue overpass looking northward on Ninth Avenue from West 39th Street, including a distant perspective of the view in question, on the east side of Ninth Avenue between West 40th St and 41st St. (Figure 6C-19 provides a rendering of the west side of the same block.) Figure 6C-27 provides an illustrative rendering viewed up Ninth Avenue looking north from West 39th Street. These figures answer the basic questions raised in the comments relating to Ninth Avenue.

Regarding the SSF, two pedestrian entrances are planned during interim operations of the SSF during construction of the Main Terminal (between 2028 and 2032). Those entrances are planned on the north side of West 40th Street and on the north side of West 39th Street toward the east side. In **Appendix 6C, “Urban Design,”** of the DEIS, Figures 6C-14, 6C-15a, 6C-15b, 6C-16a, and 6C-16c provide illustrative massing diagrams, which show from a bird’s eye view the general shape and mass of the SSF, located on a good portion of the block bounded by Ninth and Tenth Avenues, between West 38th and West 39th Streets. Figure 6C-17d comes closest to answering the comment. Figure 6C-17d shows an illustrative project rendering of the SSF looking north from West 38th Street, from just beyond one of the new open spaces created from one of the Dyer Deck-Overs. Figure 6C-18 shows an illustrative rendering of the SSF looking north on Tenth Avenue from West 38th Street. Figure 6C-20 shows the east end of the SSF passing over West 40th Street, west of Ninth Avenue. These and other figures do not give a detailed image of what the frontage of the SSF will look like, including pedestrian entrances, exits, or storefronts, and those elements must await a more detailed design stage. The ground-floor retail is not expected to cause significant pedestrian impacts and was provided in response to community and public requests to help activate under-utilized areas around the existing PABT and its infrastructure. The locations of retail are intended to improve the public realm and reconnect the neighborhood, but not in such a way that impacts or crowds existing areas of with local retail.

Figures 6C-14, 6C-15b, 6C-16a, and 6C-16c provide illustrative massing diagrams, which show conceptually from a bird’s eye view how the ramps cross over Tenth Avenue above the street level in the block between West 39th Street and West 40th Street. Figure 6C-18 comes closest to answering the comment. It shows an illustrative massing diagram of the Tenth Avenue overpass looking northward on Tenth Avenue from West 38th Street, including a distant perspective of the view in question, on the east and west sides of Tenth Avenue between West 39th St and 40th St. These figures address the basic questions raised in the comment.

The PANYNJ has been and will continue to be committed to engaging with the community and local stakeholders about the design and operations of the Proposed Project. As the design advances, the PANYNJ will continue to provide updates to the community and opportunities to provide input on design and facility operations.

Comment Group 31 I believe it is time to standardize transit fare collections at PABT, which means NJ Transit should partner with OMNY (as the JFK AirTrain and Roosevelt Island aerial tram have recently done) and coordinate with MTA and other adjunct partner agencies on back-end fare processing that will make intermodal transfers just a simple tap. (103)

Response A program to consolidate fare collection amongst the multiple transit operators in the New York metropolitan area is beyond the scope of this project and environmental review, and not within the jurisdiction or mandate of the PANYNJ.

General Design

Comment Group 32 How can governmental agencies ensure new storefronts are activated and diversified to meet neighborhood needs (e.g. community spaces, grocery stores, small businesses)? We are also supportive of retail to activate main frontages, noting that commercial uses should serve the needs of the community, and consider expanding beyond retail to comprise a diversity of neighborhood services informed by community needs, such as groceries, community spaces, or childcare. (21) Rending in figure 6C-21 shows a tremendous amount of retail space for a low-volume side street. Additional uses should be considered. HYHK - a 501(c)3 non-profit - formally requests 10,000 sf of at-grade storage/office space, to be used for equipment/vehicles/personnel needed to maintain the sidewalks in the area. (27) HYHK strongly requests that retail be included on all 10th Avenue frontage, similar to the planned west side of 9th Avenue (Figure 6C-19). (27) I commend the planned street level commercial units to enliven the streetscape and pedestrian experience. However, I am concerned about probable vacancies given the empty storefronts already in the area and difficulty renting mall units these days. Online shopping is not going away! Therefore, please build community-use spaces into the plan from the start: community meeting spaces, educational spaces, visual art (galleries and studios) and theater spaces, ear-marked spaces for non-profits, etc. (75)

Response The PANYNJ leases a significant amount of retail space throughout the metropolitan area and is familiar with market conditions across Manhattan and the region. We are prepared to tenant these new storefronts with a mix of active retail uses, serving both the adjacent community, commuters and travelers. The leasing team responsible for the new Replacement Facility will respond to the latest market conditions as it begins to develop leasing plans.

There will be approximately 65,700 gsf of street-facing retail along Tenth Avenue between West 39th Street and West 40th Street. There are certain sections along 10th Ave where the low clearance under the ramp structure does not allow a continuous retail use.

Comment Group 33 Figure 6C-19 shows new 9th Avenue ground floor storefronts constructed underneath the 9th Avenue bridge. What will the upper floors above those ground floor stores be used for? (27)

Response The Main Terminal would consist of eight above ground levels and additional subsurface levels and would span Ninth Avenue via the Ninth Avenue Bridge. The street level would provide pedestrian entrances, loading docks, private development tower lobbies, and street-facing retail spaces as shown in Figure 6C-19. The upper floors of the Replacement Facility would be used by PANYNJ for terminal operations, and would include pedestrian circulation, operations offices supporting the Replacement Facility, and ticketing areas on Level 2; bus operations on Levels 3 through 7; and a mechanical penthouse and roof area for managing stormwater on Level 8. At this specific location, Ninth Avenue and 40th street, the upper floors would be used for PANYNJ operations.

Comment Group 34 This effort should include planning for adequate and accessible pedestrian space, including potentially widening sidewalks, and connections to public transit that can accommodate the increased bus commuter demand. (4) Please study the implementation of design elements that provide security and promote pedestrian circulation both north and south and east and west along surrounding avenues and streets including enhanced lighting, ground floor retail and community spaces, and widened sidewalks. (15) “Plazitas” need to be incorporated into the project. Plazitas are the two painted pedestrian sidewalk extensions with planters on 9th Avenue at West 41st Street. SE corner of West 41st Street at 9th Avenue. SW corner of 9th Avenue at West 41st Street. The Plazitas were created with temporary material (paint and planters). The sidewalk should be reconstructed along the same geometry as the painted sidewalk extensions to enhance pedestrian safety. (27) A lot of entrances aren’t even usable anymore, including the one closest to me on 40th St. It would be nice to gain an entrance there after it’s built up. I also feel that nearby 40th St reserves far too much space for cars, and I think it might make sense to remove a parking lane and widen sidewalks to improve pedestrian flow to and from the terminal. (35) Encourage circulation North/South, East/West thru design elements promoting pedestrian circulation along surrounding avenues and side streets (lighting, retail, community space, widened sidewalks. (116)

Response Sidewalks are anticipated to be widened adjacent to the Replacement Facility, with enhanced retail opportunities at the street level. All crosswalk impacts identified for the project could be mitigated by increases in crosswalk widths. Sidewalk and corner impacts can potentially be mitigated by removal or relocation of certain sidewalk elements such as newsstands, trash receptacles, restaurant planters, and light poles, or enlarging the corner by applying “bulb-outs”. Mitigation of sidewalk impacts can be achieved by a number of means depending on the specific characteristics of each sidewalk. Mitigations might include relocation of curbs or building lines (on the project site) or removal or relocation of elements that are impeding pedestrian flow on a sidewalk. While PANYNJ does not own all of the sidewalks, curbs and intersections adjacent to, or impacted by, the Proposed Project, PANYNJ is committed to working with NYC DOT to update and improve the streetscapes alongside PANYNJ properties. Pedestrian conditions would be designed to enhance pedestrian movement, safety and security of operations and the public use. Conditions will be monitored after the completion of new Main Terminal, and as the commercial towers are developed to evaluate sidewalk and crosswalk conditions and determine the need for practicable mitigation to avoid creating a pedestrian impact.

Comment Group 35 With the significant increase in commuters going to the East and West Side, it is important to study building a # 7 train station at Tenth Avenue and/or an [sic] Select Bus Service (SBS) bus service on West 42nd Street. (15) I would like the Port to append to this project the integration and joint redevelopment of the 8th Avenue Subway Station A, C, E, 7. The design seems to ignore this vital next facility as it does today and that's a big miss. (45) I am happy to read that one of the goals of the Project is to improve subway access to the Bus Terminal. That’s great and very important to New Jersey bus commuters like me. One specific improvement that needs to be part of the Project is a subway station on the 7 train at the Bus Terminal, ideally at 9th Avenue. (52) It would be great to see this rebuild include a 10th Avenue stop for the 7 train. That would be very useful for commuters going to Hudson Yards or Grand Central, and for members of the Hell’s Kitchen community. (95)

Response The PANYNJ is not responsible for planning, designing or constructing subway stations which are part of the MTA / NYCT system. The PANYNJ work involving modifications to existing subway stations (including relocation of stairs during construction, or the creation of replacement stairs or other vertical transportation as the new Main Terminal is completed) are all within the property boundaries of the PANYNJ.

Comment Group 36 Please Confirm: that there will be no taxi stand on 9th Avenue or West 40th Street. (15) Think about having a functional taxi stand. (108)

Response The taxi and for-hire-vehicle pickup and drop-off zone would be provided adjacent to the Main Terminal on Eighth Avenue between West 40th Street and West 42nd Street.

Comment Group 37 MAS is encouraged to see that the project aims to integrate the forthcoming West Midtown development projects, but we are unsure what this includes and how this will be achieved. We urge the team to use this project to bolster pedestrian connections to the west side waterfront. (21)

Response The Proposed Project is primarily focused on the public realm immediately surrounding the Replacement Facility, which will be enhanced with widened sidewalks, street-level retail, and improved conditions where the Replacement Facility ramps cross over avenues (more clearance, natural light, activated retail spaces, etc.). While creating connections to West Midtown was not a core goal or objective of the Proposed Project, we appreciate the comment noting the large improvements to the public realm.

Comment Group 38 The Port Authority should work with [NYC] DOT to install pedestrian lights along the north side of West 36th Street between 9th and Dyer Avenues. The lights should be the same style as in Bella Abzug Park and Restaurant Row. (27) Install pedestrian lighting to the 'Canoe' (W.36th Street between 9th & Dyer Ave). (116)

Response Comment noted. This is not within the scope of the Project as NYC DOT has jurisdiction over these streets and is responsible for street lighting.

Comment Group 39 Given the current state of the office market, a hotel above the bus terminal would be a good alternative to an office building. (91)

Response Thank you for your comment. The PANYNJ believes that office uses are the most appropriate development at this location – both to maximize the nexus of transit opportunities and generate funding for the project. This direction can be reevaluated should market conditions raise concerns and appropriate steps will be taken to update the environmental review of the program.

Comment Group 40 Please confirm how deep the foundations of the expanded terminal building will go below grade at the lot adjacent to our building. Please confirm if there will be basement or cellar levels at this location. Please confirm if the new foundations and substructure will go below the foundations of our buildings. Please describe what type of foundations will be used to support the new terminal building and SSF and how they will be installed to protect 403 West 40th Street. Please provide the geotechnical investigation of the lot below the ramp structure with investigations of the foundations of the adjacent buildings by test pits. Please describe the nature of the sub-grade below the new building and adjacent to our property. CHDC requests to review the geotechnical report by our consultants and reserves the right to ask additional questions based on the findings of this report. Please provide SOE drawings for the new terminal as required by the NYCBC. This should include measures to maintain CHDC building's foundation and sub-grade in a stable condition and include details of their installation. SOE may include underpinning and soil bracing as required to maintain stability of our buildings. (23)

Response The DEIS is intended as a regulatory document to disclose potential environmental impacts resulting from the Proposed Project. It is not intended to cover all technical work, much of which is still in the process of being designed / developed. These are all important questions,

which the Port Authority is committed to address, but the process to provide appropriate information, including specifications for support of excavation to adjacent properties and coordination during design / construction process, would take place outside of this EIS process. PANYNJ will have a coordination plan to work with adjacent property owners; to the extent that PANYNJ construction requires access to their property, and will work to establish the appropriate level of monitoring / recordation, mitigation etc.

Comment Group 41 We are very pleased that this project will result in open space in a neighborhood that currently has few open space options. We encourage the Port Authority to outline a clear process for deciding who will operate and maintain the open space. We urge the Port Authority to receive public input on the design of the open space to ensure the spaces include elements that meet community need, including replacement space for the Astro's Community Dog Run. (4) Park Maintenance – The City would like the Port to clarify that the Port will be maintaining any new public open space developed as a result of this project including the Dyer Deck overs. (11) Agree to a formal public process with full community input, for all creation of public green open space programmatic plan and design. A design schedule must be detailed for each open space with dates for design plans, bidding, and construction milestones, given a long development period. Please Confirm: Please confirm that the community will participate and partner in developing the use and design of any Port Authority developed green open spaces. This community-based design in a specific timeframe should be detailed in a Points of Agreement document as reached during the Uniform Land Use Review Process (ULURP) process. It would behoove the Port Authority to carefully plan for and agree to ongoing maintenance with any other concerned parties. Ownership, design, management, funding, security and programming are all important pieces to a successful open space, and each piece should be carefully considered. The NYC Parks Department should be consulted, if not partnered with, in such a design. It will be important to identify how maintenance revenue will be generated. The design process should be concurrent with construction of Phase 1 of the PABT replacement project. No further renderings of the green space should be created until the formal design process begins. Please Confirm: Please confirm that the staging decks over Dyer Avenue will structurally support a public open green space with full grown trees and plantings. Please note that 'green' space structural load will be in excess of what is required for bus staging. (15) MAS supports the addition of 3.5 acres of new public open space, and we encourage you to ensure that these spaces are not only accessible and open, but welcoming, green, and comfortable for users in different seasons. Note that shadows of the storage and staging facility may impact the growth of plants and human experience within this new open space. MAS urges the team to consider the constrained adjacencies to the east and west, noting that perimeter design and access points will be key considerations. The park space and building massings should be tested and adjusted, if necessary, to ensure thermal comfort in the park for users and maximize growing conditions for the landscape. Ensure that the design of the storage and staging facility does not preclude viability of lush plantings and greening at the Dyer Deck-over open space. (21) While we applaud the Port Authority for their serious commitment to the community's request for permanent green space, we want to raise concerns about ownership, maintenance, and security: What is the planned process for community input in the design of the green spaces? What entity will own these spaces after completion? What entity will maintain these spaces? How will maintenance revenue be generated? How much money will the Port Authority contribute to ongoing maintenance and capital repairs? Who will have enforcement capabilities of these spaces? (27) To determine the physical design of the green spaces, we recommend that a thorough, community-based design process be completed, but only AFTER all of the above questions are answered. The eventual maintenance entity needs to be involved in the design process. All park uses should be considered, included but not limited to, active uses such as sports and recreation fields, open air theater, and a dog run, as well as passive uses such as green spaces, seating and open areas. NYC Parks Department should at least be consulted, if not partnered

with. No further renderings of the green space should be created until the formal design process begins. (27) Construct staging decks over Dyer Avenue to structurally support public open green space. Please note that 'green' space structural load will be in excess of what is required for bus staging. (116)

Response The PANYNJ is still developing details around the design process and related public and stakeholder engagement associated with the publicly accessible open space atop the Dyer Deck-Overs; similarly, there is not a specific schedule or Operations & Maintenance Plan. The PANYNJ would fund and construct the open space and would coordinate with the community stakeholders to determine the final programming, design, and operations. The decks are designed to support the loads involved with soil and plantings. The EIS assumed that the publicly accessible open space on the Dyer Decks would be constructed and operational by 2040 for the purposes of analysis. The deck-over space will be in use for temporary bus operations during the Phase 2 of construction until 2032 (when the new Main Terminal is completed) – construction of the open space could not begin prior to the conclusion of Phase 2.

Comment Group 42 Study the feasibility of a pedestrian bridge to from West 36th Street to West 37th Street over the depressed portion of Dyer Avenue. Please Confirm: How many (and which) sidewalks will be enlarged and / or equipped with neck downs? Will the radius of the SE Corner of West 40th Street and Eleventh Avenue be sharpened to make a safer pedestrian crossing? The sidewalks on SE and SW corners of Ninth Avenue at 41st Street with pedestrian bump outs, known in the neighborhood as "Plazitas," and currently maintained by the HYHK Alliance, will be constructed as part of the sidewalk. The conflicts of turning buses with the pedestrian crossing on West 40th Street and Dyer Avenue will be resolved in favor of pedestrian safety. A sidewalk will be created on the south side of West 41st Street (Ninth Avenue/Dyer) to allow for pedestrian circulation and will replace the passage currently located on the south side of the bus tunnel. Con Edison grates will not be located on the sidewalk, but rather installed within buildings. Security bollards will be designed in such a way that trees can be planted in between them. (15) How will pedestrian paths from 38th and 39th at 10th Avenue (by the Dyer Deck-overs) connect the forthcoming open space and Port Authority facility to the planned pedestrian connections along 40th Street at 11th Avenue? (21)

Response The DEIS is intended as a regulatory document to disclose potential environmental impacts resulting from the Proposed Project. It does not analyze further additions or modifications to the Proposed Project such as a new pedestrian bridge over Dyer Avenue. As described in Chapter 2, "Project Alternatives" of the DEIS PANYNJ studied potential alternatives from 2013 and 2021. The specific mitigation at each location has not been determined and will depend on the situation. The Proposed Project does not anticipate additional decking or bridging structures above Dyer Avenue beyond what is already included in the scope of the Project. The Proposed Project will increase the width of sidewalks surrounding the new Main Terminal and the SSF; in other locations it will be providing new sidewalks. Pedestrian conditions will be monitored after the completion of the new Main Terminal and as the commercial towers are developed to evaluate sidewalk and crosswalk conditions and determine the need for further practicable mitigation to address pedestrian impacts. This assessment will be done in collaboration with the New York City Department of Transportation.

Comment Group 43 The PANYNJ is evaluating how it might be able to improve circulation conditions around the intersection of Ninth Avenue and West 41st Street but such improvements are not considered as part of the Proposed Project. The PANYNJ will continue to engage with the community and local stakeholders as planning continues. The PANYNJ will work closely with private utilities about the location of their facilities and endeavors to locate components like utility grates outside of pedestrian circulation areas as feasible and practical. Design for streetscape and security elements (e.g. – street trees, bollards) are underway and will seek to meet security requirements for the locations of protective devices (like bollards or other methods of vehicle interdiction) while also fulfilling goals for an improved public realm. (15) Are there structural requirements for the foundations and structure of the towers to be able to withstand impact like what happened on 9/11? With the PABT, a major public transportation hub, this matter is a serious community priority. Although this chapter outlines aspects of structural safety and security in the new facility, it does not address any safety measures against potential terrorist attacks or other emergencies on the ramps. Will there be an emergency evacuation route and plan? (15)

Response Safety, emergency and structural plans / requirements are being fully developed as discussed in Chapter 13 “Safety and Security” of the DEIS, which can be found in **Appendix A** of the FEIS). The PANYNJ does not publicly disclose detailed information regarding safety and security protocols or requirements but intends to comply with appropriate regulations and best practices in collaboration with local, state and national partners.

Terminal Design

Comment Group 44 MAS supports the stated intention of a welcoming and light-filled civic space with improved wayfinding. This is an opportunity to build a civic destination, a place that is inviting to both New Yorkers and tourists alike, a place where people linger to shop and dine, and a place where people go to attend events. Consider rooftops as social gathering spaces that also decrease carbon emissions and provide views to the McGraw-Hill Building. Look at examples from other cities, such as San Francisco, where the bus terminal includes a rooftop linear park. As the design develops, emphasize the civic nature of the building, including not only visual presence, but access and activation from each bounding street. Provision the major entrance to the Bus Terminal to be the greatest presence along 8th Avenue, with commercial lobbies being secondary to the civic project. Ensure the new terminal building is welcoming and easy to navigate, incorporates natural light and greenery, and provides areas of respite with seating for passengers. Incorporate public art in the new terminal, possibly a temporary rotating program. Clarify what will happen with the existing artworks at the site. (21) My only concern will be the terminal being a hub bub of intellectual and international cultural differences of the USA. If the terminal will reflect New Jersey and New York or vice versa that is much ground to cover, how could you not have some type of true symbolism for all of mankind on their terms. (40) This is a \$10 billion project with almost no character, innovation, or even attempts to do anything beyond shoehorn a bunch of giant metal boxes into a residential neighborhood where they'll will be immediately out of scale and out of place. Why are the roofs of the buildings, the mammoth main terminal, and storage and staging facilities not green roofs or covered with solar panels to help mitigate the carbon footprint, or value- added spaces like rooftop parks for Public East like San Francisco developed in their new transit of the open in 2018? (49) I strongly encourage your architects and engineers to do their research and due diligence to compare to other successfully designed bus terminals so there are no crowding or dangerous lines in front of escalators, queue organization and space for everyone. Signage also needs improving. (76) PABT definitely needs more light/sunlight. Looks dreary in and outside. And a pizza spot. (88) One of the major causes of slow service is the time disembarking takes. This could be reduced by, I estimate, 75% by making the bus floor level the same as the platform, either by mandating bus companies to use low floor buses or

building platforms at the higher floor level and modifying existing (and ordering new) buses with doors that allow for exiting without going down steps. (99) Improve the functionality. Clearer signage, more waiting areas with seats, good ventilation and air quality (it gets SO hot in the current gates and they feel like cattle stalls). More space for passenger unloading in the mornings, with wider sidewalks. More intuitive layout, with regional buses in a separate area from long-haul buses, etc. Improve the corridors that connect to the subway. Ventilation, light, higher ceilings. The current corridors are dark and stinky and make you never want to visit PABT again. (106)

Response Goal 2, “Improve the passenger experience with the Terminal”, includes multiple objectives related to building design and passenger amenities. The Replacement Facility would include amenities to improve the passenger experience and the aesthetic environment, such as improved wayfinding signage, climate-controlled passenger waiting areas, and large windows to provide natural light. Objective a, states PANYNJ’s commitment to “Utilize sustainable building design technologies or practices that enhance environmental performance.” PANYNJ policy requires construction projects greater than 1,000 gsf to adhere to PANYNJ’s Sustainable Building Guidelines. While not required to achieve full certification, PANYNJ encourages projects to follow United States Green Building Council (USGBC) LEED guidelines. Section 3.4.2 of the Sustainable Building Guidelines indicates that the appropriate target LEED rating for a new construction project of greater than 20,000 gsf is LEED Silver. PANYNJ will create green roofs on the SSF and new Main Terminal in compliance Local Law 97/98.

Objective b, indicates PANYNJ’s commitment to “Incorporate State of the Art building design, communications, and passenger amenities (e.g., gates and queuing areas, ticketing, restrooms, and waiting areas) to promote ease of use and reliability of the passenger experience.” PANYNJ will take account of universal design principles to accommodate passengers of all abilities, including implementation of a modern and ADA-compliant wayfinding designs that accommodates hearing- and visually impaired persons.

PANYNJ will seek to use best-in-class design and consider both the civic presence of the Replacement Facility and also the fabric of the surrounding neighborhood. Included in the design will be measures or treatments that would enhance the pedestrian and streetscape environment; please see Chapter 6.C “Urban Design” from the DEIS in **Appendix A** of this FEIS. Goal 3, “Provide seamless passenger accessibility,” includes objective b, “Maintain or improve pedestrian accessibility between the PABT and traveler origins and destinations,” and objective c, “Enhance passenger experience and flows within and around the new terminal.” The Proposed Project will enhance the existing connections from the new Main Terminal to the subway but is responsible only for the portions of the connection that falls within its property and jurisdiction. PANYNJ will continue to work with the City and stakeholders to identify appropriate measures that will be consistent with local plans.

Comment Group 45 Tri-State Transportation Campaign is supportive of the Port Authority’s initiative to replace the antiquated Midtown Bus Terminal. However, our organization would like to emphasize the importance of a design that significantly enhances the commuter experience. Given its vital role in regional transit, especially for commuters and local residents accessing areas not served by other means, redesigning the Port Authority Bus Terminal must prioritize functionality alongside aesthetics, considering the anticipated rise in bus ridership. (29) We need efficiency and a neat, functional design, but not an aesthetic monument or anything grandiose. Easy circulation, handicapped accommodation, restrooms (even if used often by homeless people who need restrooms, too), obvious directions in clear typefaces, good lighting, openness to promote good

behavior, even narrow benches but some benches for people waiting for their buses, and other features of thoughtful design are essential. (74)

Response Meeting 2040 bus ridership forecasts is a key purpose of the PABT redevelopment. The PANYNJ agrees that the new PABT must take a long-term approach to planning for operations, which is why the ability to accommodate future year bus and ridership demand was a fatal flaw screening criterion applied for the evaluation of project alternatives. The Replacement Facility is designed to alleviate bus congestion and facilitate more efficient circulation of passengers within the new Main Terminal. An improved passenger experience is also a goal with design that opens the interior space of the building allowing for more intuitive navigation, as well as a robust, accessible and multi-lingual wayfinding program. Passenger amenities, including retail, seating, ADA compliance and expanded queuing and circulation areas are all critical elements of the new facility.

Comment Group 46 The DEIS explains that the building will be naturally ventilated, “the new Main Terminal, SSF, and the associated ramp infrastructure elements of the Replacement Facility are anticipated to be naturally ventilated with uniformly distributed openings on at least three side using either open facades or a permeable facade screen to allow airflow into and out of the facility for proper ventilation of bus operating areas of the facility (pg. 10-1).” It is not clear from this explanation if this refers to indoor portions of the terminal as well as the outdoor structures. The DEIS would benefit from additional discussion of how the building design will incorporate natural ventilation, if this is required by building code and how the natural ventilation will ensure that there are no impacts to human health of those utilizing the semi-outdoor structures. (pg. 10-12) (5) Please Study: Enclosing the PABT main terminal, SSF, and Ramp Helix structure in non-porous building envelopes. Current PABT plans call for open/porous structures enclosing bus gates and ramp structures relying on air circulation and natural ventilation. Filter vehicular emissions from PABT replacement terminal rather than vent into the surrounding neighborhood. The DEIS routinely refers to ventilation. Instead, the Project should call for highest quality emission filtration technology and systems. (15) What is the backup system for ventilation and air filtration. Any enclosed spaces, without required ventilation and air filtration will have air quality harmful to human health. (15) Additionally, any ramps should be completely enclosed to introduce perhaps some sort of carbon capture or at the very least to capture emissions from double the number of buses coming in and out, and through air monitoring and filtering stop emissions from affecting air quality. Enclosing the terminal will also remedy the current issue where bus drivers throw so much trash out bus windows as they travel down the ramp into the tunnel. (49) Enclose PABT main terminal, SSF, Ramp Helix structure in non-porous building envelopes. Current PABT plans call for open/porous structures enclosing bus gates & ramps structures relying on air circulation and natural ventilation. Filter vehicular emissions from PABT replacement terminal rather than vent into the surrounding neighborhood. DEIS routinely refers to ventilation. Instead, plan should call for best-in-class emission's filtration technology & systems. (116)

Response The new Main Terminal, SSF and the associated ramp infrastructure elements of the Replacement Facility are anticipated to be naturally ventilated with uniformly distributed openings on at least three sides using either open facades or a permeable façade screen to allow airflow into and out of the facility for proper ventilation of bus operating areas of the facility. Areas where bus operations would occur would be naturally ventilated, while passenger waiting areas and interior spaces would be conditioned, separate from the roadway areas within the Replacement Facility. Therefore, passengers’ exposure to vehicle exhaust from bus operations would be transient in nature and would not experience the air quality conditions within these areas. Natural ventilation from the permeable facades of the new Main Terminal, SSF, and the associated ramp structures of the Replacement Facility were also analyzed for potential air quality effects in the DEIS. This analysis

determined the Proposed Project would not result in cumulative significant adverse air quality impacts.

The plan to create a modern bus terminal is predicated on more efficient operations in terms of bus storage and staging, and movement in and out of the Replacement Facility. The Proposed Project with integrated storage and staging operations in the SSF, would result in fewer buses circulating on city streets and a reduction of on-street idling of buses – a readily observable source of vehicle emissions and air quality concerns. Goal 6, “Reduce the impacts of bus services on the built and natural environment,” includes several measures that PANYNJ believes will minimize impacts to local air quality, including; reducing bus idling, unnecessary bus circulation, and traffic impacts on local city streets, reducing bus VMT on city streets, and reducing bus idling within the Facility.

Comment Group 47 The intercity bus operations would be in the basement of the Replacement Facility while intercity bus staging and storage would be on the rooftop of that facility. Greyhound urges the PANYNJ to rethink this proposal and restructure it so that intercity bus operations and intercity bus staging and storage are adjacent to each other, or at least, much closer than what is currently being proposed. (18) The LPA provides a much-needed staging and storage facility (SSF), but it appears that intercity buses will not have access to the new facility. Rather, intercity bus staging and storage will be on the seventh floor of the main terminal. See DEIS, Figure 9A-11, Page 9A-24. Assuming that Figure 2-4 of the DEIS is an accurate depiction of the floor levels, the seventh floor is the rooftop. See DEIS, Figure 2-4, Page 2-13. Thus, the intercity bus operations would be in the basement of the Replacement Facility while intercity bus staging and storage would be on the rooftop of that facility. It is hard to imagine a more awkward, inefficient, and costly plan for intercity buses than this one. FlixBus urges the PANYNJ to rethink this proposal and restructure it so that intercity bus operations and intercity bus staging and storage are adjacent to each other, or at least, much closer than what is currently being proposed. (30)

Response The PANYNJ has clarified the description of the operations of the SSF in the FEIS (See **Appendix B.4.1 ‘Bus Services’**). Intercity buses will be able to use the SSF. All buses (including intercity buses) will be able to move from the SSF to any level of the new Main Terminal through the use of the ramp structure.

Comment Group 48 Is it possible that the upper floors of Staging and Storage Facility could be slightly angled (reduced in size) at the southeast corner to allow more sunlight to enter West 40th Street without negatively impacting bus turning? See image below. (32)

Response The PANYNJ will consider the opportunity to make revisions that do not compromise the operations or core functions of the SSF which may also improve the public realm.

Comment Group 49 We encourage the Port Authority and the MTA to work together to ensure clear connections between the replacement bus terminal and NYC public transit options, with clear and accessible entrances and wayfinding elements to direct commuters. (4)

Response The PANYNJ agrees that cohesive connectivity between the replacement bus terminal and public transit options is important. The design for the new Main Terminal will address issues related to navigation and orientation in the terminal in multiple ways as described in DEIS, Chapter 2, “Project Alternatives” (See FEIS **Appendix A**) The central atrium is anticipated to improve wayfinding and accessibility to transit connections. Additionally, the PANYNJ will develop a robust, multi-lingual and fully accessible wayfinding program for the Proposed Project in close collaboration with bus operators, agencies and local stakeholders. As part of overall improvements to the design

of the new Main Terminal, subway connections within the terminal will be improved and made more accessible to those that are mobility impaired.

Interim Operations

Comment Group 50 The DEIS notes that there will be temporary elevator access for 2028 in the vicinity of the current elevator. However, only the elevator to be installed after the project completion is noted to be ADA-compliant. To best accommodate elderly and disabled people, please confirm that the temporary elevator access in 2028 will also be ADA-compliant and ensure that access to the temporary and new elevator will be as proximate and easily accessible, if not more so, as the current elevator. Please Confirm: That the temporary bus operations relocated to the SSF, the Dyer Deck-Overs, and West 30th Street will be ADA compliant. (15) Please describe how PANYNJ will ensure ADA access to small business entrances. (23)

Response All facilities built during of the construction of the Replacement Facility – temporary or otherwise – will be ADA compliant. With temporary operations starting in 2028 (and continuing through 2031 with construction of the new Main Terminal), the Proposed Project would remove existing elevators to the 42nd Street-PABT Subway Station within the existing PABT. These elevators serve a variety of passengers, including the elderly and disabled populations. During this period, any passengers requiring use of an elevator to access the Eighth Avenue subway lines would have access to a temporary, ADA accessible elevator near the temporary stairs to the subway station, on Eighth Avenue between West 40th and West 42nd Streets, which would be constructed prior to the removal of the existing elevator. Therefore, elevator access would be maintained for elderly and disabled passengers. Because commuter bus operations would be temporarily located west of Ninth Avenue, all passengers using the SSF, including elderly and disabled bus passengers, would need to travel approximately one and one-half avenue blocks (approximately 1,100 feet) farther to the temporary elevator to the existing Eighth Avenue subway lines, than in the No Action Alternative. Within the SSF, all temporary gates would be ADA-accessible, which would represent an improvement compared to the existing PABT in which certain gates are not ADA-accessible. During any particular construction activities that may require modifications to how local businesses are accessed, the PANYNJ will require that accessible connections are maintained.

Comment Group 51 The proposal for the replacement of the bus terminal will make it much harder for people to make use of additional public transit once they get into New York City. As it stands, only the A, C and E trains are easily available from the existing bus terminal. By moving the bus terminal, a block West, that will increase the amount of time that people will have to walk to get on the subway to go elsewhere in Manhattan. (96)

Response Maintaining connections to existing transit during construction of the Replacement Facility was a key consideration when evaluating potential alternatives for the LPA. Building the new Main Terminal on the site of the existing PABT provided many benefits for the long-term operations of the new facility with direct connections to subway stations. While the SSF and Dyer Deck-overs (in use for bus operations during the second phase of construction) are an additional block away from the subway connections, this is for a limited amount of time (four-year construction period) and will allow for the direct subway connections once the new Main Terminal is operational. The PANYNJ has developed detailed plans to maintain safe pedestrian conditions during this phase of construction and support efficient circulation, as detailed in **Appendix B.7 “Construction”** of the FEIS.

Comment Group 52 There are many other viable curb spaces nearby. Please provide the requirements for the bus locations. Please work with the Hudson Yards/Hell's Kitchen BID to find alternatives for such interim buses. We echo the sentiments of our neighbors and wish to express our deep concerns regarding on-street bus operations during construction of the Port Authority Bus Terminal Replacement, as outlined in the DEIS, Chapter 9: Transportation. In particular, the proposed changes on Hudson Blvd East between 33rd and 34th Streets raise significant concerns. This location is not available for bus operations as the New York City Department of Transportation has already approved a "shared street" for this segment, which will remove parking from the street and provide only one lane of through traffic. Implementation is scheduled to occur in 2024. We understand the need for improved bus infrastructure, but it is critical to find solutions that don't adversely impact the community. We urge the Port Authority to collaborate with Manhattan Community Board 4 and the Hudson Yards-Hell's Kitchen Alliance and develop a comprehensive plan for bus parking that minimizes disruption to the neighborhood. (15) The EIS also states that 55 buses will utilize the West 30th Street lots for curbside operation. HYHK cautions the Port Authority to only use their own property along 30th Street and not to expand beyond that boundary. (page 9B-21) Hudson Boulevard East between West 33rd and West 34th Streets and Hudson Boulevard East between West 34th and West 35th Streets will NOT be available for bus operations. NYC Department of Transportation has already approved a "shared street" for those two street segments. Implementation will occur in 2024. The shared street removes parking from the street, there will only be one through lane. Please see attached engineering drawings and renderings. Similarly, West 35th Street (between Hudson Boulevard West and 11th Avenue) has only one travel lane and no parking lane, due to construction. There are many other viable curb spaces nearby. Please provide the requirements for these locations and HYHK would be happy to help find viable alternatives. (27) The analysis of future vehicular traffic volumes makes some large misjudgments. It is assumed that by 2028 there will be, "90 buses utilizing curbside operating locations on Dyer Avenue, Hudson Boulevard, West 35th Street, Eleventh Avenue, West 34th Street, and West 33rd Street." Some of these locations are not currently or in the future available for use as a curbside location. West 35th Street between Hudson Boulevard West and 11th Avenue is currently closed to traffic due to a sidewalk construction shed. There is no timeline on when it will reopen. It should be assumed for the purposes of this draft EIS that it will not be available for curbside bus operations. Hudson Boulevard East is a DOT approved shared street, which expressly prohibits parking of any vehicle, including buses. See additional comments on page 1. It is also used as part of the DOT open streets program, a programming and events activation space for events that are free to the public. Bus operations are not possible at this location. (27) We do ask that full consideration be given to those such as Coach USA, who use the facility in mitigating any operational disruptions that may occur and take into account such impact it will have on our customers. (98)

Response The FEIS has revised curbside positions for bus operations (both during Phase 2 of construction of the Proposed Project and for the No Action Alternative) in response to the "shared streets": plans for this section of Hudson Boulevard. Revised results can be found in **Appendix B.4.1 "Bus Services"** of the FEIS. The PANYNJ will only site bus operations at West 30th Street on property under its ownership or direct control.

The locations for curbside bus operations have been updated to coordinate with NYC DOT plans for implementation of a shared street on Hudson Boulevard East between West 33rd and West 34th Streets. The revised curbside bus positions is described in **Appendix B.4.1 "Bus Services"** of the FEIS. The PANYNJ will work closely with the community, NYC DOT and the bus operators as the date for implementation approaches.

Comment Group 53 Provide an alternate configuration of interim gates on West 30th between Dyer and Ninth Avenues to preserve the full sidewalk (four buses parallel parked along an enlarged sidewalk on the north side of the property). Will the West 30th street interim terminal be ADA compliant? (15)

Response The design of the PANYNJ owned facility at West 30th Street is still under development in coordination with, and subject to, the ultimate approval of NYC DOT. While not part of the Proposed Project, the PANYNJ will keep the community informed as the design of this property advances. The West 30th Street facility, owned by the PANYNJ, will comply with ADA and make accommodations for all passengers.

Comment Group 54 The temporary decks show no interconnection for buses nor passageway for passengers. Those are the two ingredients, are they not, of a bus terminal? How do they link with the storage & queuing structure as a temporary facility & ultimately, how this wasp waste [sic] entryway to the new terminal wrapped around the office tower bases not inhibit circulation? It is great & critical that the best site, i.e. the current site of PABT has been chosen but somehow a much improved passenger environment & bus capacity does not seem to be what's happening. (100)

Response The EIS is intended as a regulatory document to disclose potential environmental impacts resulting from the Proposed Project. It is not intended to include the precise details on project design. Project design elements for the interim facilities will be developed after the environmental review process. When used for temporary bus operations during construction, the Dyer Deck-Overs will not be connected to the SSF. Bus passengers will be able to access / depart from bus gates via walkways across the decks to reach sidewalks.

Passenger Facilities

Comment Group 55 The ground floor has insufficient retail while the bus platform floors above have no retail space. A modern terminal needs the shops, restaurants, services such as those found in Moynihan Train Hall, LGA's new terminals, EWR terminal A. I fear the plan adopts the open concept of the north building's 300 gates we have today. That space is unpleasant, disorganized . (lines extend and collide) and void of useful amenities. (45)

Response The DEIS is intended as a regulatory document to disclose potential environmental impacts resulting from the Proposed Project. It is not intended to include the precise details on project design such as queuing or specific passenger amenities. Project design elements will be developed after the environmental review process, and shared with the public for input.

Comment Group 56 I'm hoping you will think of having more elevators so that it's not such a long walk to get to the elevator. If I enter on the Eighth Avenue, 40th Street side and to get to the nearest elevator, it's quite a long walk over toward Ninth Avenue side of the station to find an elevator. (108)

Response The Proposed Project would include amenities to improve the passenger experience and the aesthetic environment such as state-of-the art building design and improved communication, operations, queuing areas and restrooms. Vertical circulation elements such as the precise locations of elevators and escalators are not included in the EIS. The EIS is intended to be a regulatory document to disclose potential environmental impacts resulting from the Proposed Project. This level of project design will be developed after the environmental review process.

Comment Group 57 Additionally, ample seating remains a neglected aspect of station improvements. Seating in stations is an important accessibility measure that should not be compromised in an attempt to deter those deemed undesirable. Addressing these issues comprehensively is essential to creating a new terminal that truly serves the needs of its commuters efficiently and effectively. (29) Where are the restroom facilities? There are too few in today's terminals. (45) I would also love to see the new bus terminal incorporate ample seating for customers throughout the station and at bus berths with device charging, water bottle fill stations, and fully accessible restrooms, and easy connection between the NJ Transit bus areas and NYCT. (58) Implementation of possibly having luggage storage areas so that way people can have compartments for their luggage. Affordable connectivity program at the terminals, a store for free phones. And then food assistance, free pantries -- reference little free pantries throughout the area. And residential areas and path walk areas, free health insurance section, temp free housing hotels to apartment to houses. Free PPE equipment and then cash assistance. (102) Seating—terminals without seating is a real difficulty for people who can't stand for long periods of time. So please think about. (108)

Response The Proposed Project would include amenities to improve the passenger experience and the aesthetic environment such as state-of-the-art building design and improved communication, operations, queuing areas or specific passenger amenities. PANYNJ appreciates comments from the local community, commuters and travelers who use the existing terminal and have communicated the need for public seating. Although the design for the Proposed Project is still in its early stages, PANYNJ will continue to identify opportunities to incorporate multiple types of passenger amenities, including seating. The EIS does not include precise project design elements such as location and number of restroom facilities. This level of design will be developed after the environmental review process.

Enhancing transit connections has long been a priority for the project and the new Main Terminal will not only maintain existing transit connections but will also improve circulation and transfers from the terminal to the subway system. As discussed in Chapter 4 “Socioeconomic Conditions”, Chapter 5 “Environmental Justice,” and Appendix 3B “Community Facilities and Services” of the DEIS (found in FEIS **Appendix A**), the PANYNJ currently partners with multiple non-profit and community business organizations to provide social services within PABT. The operation of the Proposed Project will not result in significant adverse impacts to community facilities and PANYNJ will continue to work with local organizations to provide social services.

Comment Group 58 Thousands of people rely on it daily for work commutes and, or visits to family across the Hudson, central to the enhancements needed is the implementation of effective wayfinding systems, crucial for ensuring clear navigation, timely arrivals and departures. The current labyrinthine layout of the terminal is notably confusing, resulting in feelings of disorientation and frustration among users. Wayfinding signs, monitors and display boards should be designed in consideration of first-time users. Information of the location of bus lines as well as their routes and destinations should be highly visible, clear and easy to understand. Recognizing the diverse demographic and geographic backgrounds of the terminal's users, it is imperative to consider the additional hurdles encountered by non-English speakers and readers. (29)

Response The design for the new Main Terminal will address issues related to navigation and orientation in the terminal in multiple ways as described in Chapter 2, “Project Alternatives” of the DEIS(found in FEIS **Appendix A**).. First, the creation of a central atrium – serving as a main entry to the terminal - is anticipated to improve wayfinding and accessibility to transit connections. The new terminal will be designed to provide line-of-sight navigation or clear visual pathways so customers can see the direction they want to move towards, even if their destination is on a different facility

level. Second, the permanent closure of a portion of West 41st Street between Eighth and Ninth Avenues would accommodate a unified ground-floor entrance to the Main Terminal, resulting in improved and intuitive passenger circulation within the facility. The existing terminal today does not have a direct pedestrian route between the north and south wings preventing pedestrians to move between the north and south wing-at grade. Lastly, the PANYNJ will develop a robust, multi-lingual and fully accessible wayfinding program for the Proposed Project in close collaboration with bus operators, agencies and local stakeholders.

Ramp Design

Comment Group 59 Please study promoting neighborhood context for where facades connect with surrounding contextual environment rather than responding only to internal program uses. Please study means and methods to mitigate required massing to maintain visual connection between Hell's Kitchen north and south of the proposed project. Include elements and details which provide scale along exterior facades and structure to break down monolithic elevations. Examples include considering the use of transparency (glazing), allowing for visual connection between Hell's Kitchen north and south, or using large-scale art along exterior structure to avoid the appearance of monolithic elevations. Ninth, Tenth Avenues and West 40th Street Overpass: Dyer Avenue's Lincoln tunnel access has long divided the east and west sides of the neighborhood. The scale and massing on the proposed PABT Replacement Terminal, the SSF, Ramp structure, and avenue spanning overhead ramps will potentially have a similar impact, by dividing north from south as the new buildings run from Eighth to Eleventh Avenues. Please Confirm: MCB4 understands, from conversations with the Port Authority, that the base height of the terminal on Ninth Avenue will be consistent with the heights of the tenements on the west side of Ninth Avenue north of West 40th Street. The new terminal and retail facades on the east and west sides of Ninth Avenue will be consistent with the context of the Paddy's Market tenement vernacular including building shapes, masonry and punched window openings. (15) The massing studies for the storage and staging facility and overpass and ramp structures show potential adverse impacts on the new open space and the pedestrian experience along adjacent streetscapes. For example, on 39th Street between 10th and 11th Avenues, the sheer wall rising overhead feels overpowering, and the shadow-impact of the towers on the open space could impact options for viable plantings. Recommendations: Thoughtful design and screening of these structures that minimizes their visual impact and helps to blend them into the urban fabric, such as considerations for the integration of transparency at the bridge and a rainscreen at the ramps, will be critical to mitigating these impacts. MAS also encourages the team to consider how these structures can be designed to serve multiple uses, for example, activation of the roofs with public programs and open space, and of the perimeter with mixed commercial and/or community space. (21) Has the PANYNJ considered an option that eliminates the need for a ramp between Metro and Dyer Avenue? This would greatly improve the impact of the new structures as they relate to pedestrian uses of the South side of West 40th Street from 9th Avenue to Dyer Avenue and mitigate the noise and vibration created by the ramp. (32) Physical and visual impact of the height and treatment of exterior walls of bus storage facility and terminal. How will they integrate with the neighborhood and not be soaring blank facades? (75) Adhere to/mirror neighborhood & city street-walls/lot-lines for exterior building envelopes rather than modeling exclusively around internal programmatic elements. (116)

Response The ramps are necessary to provide a direct connection between the Lincoln Tunnel, SSF and new Main Terminal and, thereby reducing the amount of on-street bus movements. The ramps are located on PANYNJ-owned property to avoid the acquisition of privately-owned property, which was a community request that the PANYNJ has committed to follow. Additionally, the ramps must meet engineering requirements related to slope, turning radius, clearance, etc. which result in

the configuration of the ramps as proposed. Ramps on the east and west side of Dyer Avenue are required to accommodate evening or PM peak operations where the west side is outbound and the eastside in inbound.

From inception, the PANYNJ's design process has sought to both engage with the community and create a facility that is contextual with the surrounding built environment and responsive to stakeholder feedback. The PANYNJ will investigate the opportunity to make any revisions that do not compromise the operations or core functions of the Replacement Facility which may also improve conditions of the public realm. A record of engagement and meetings with the community can be found in **Chapter 4, "Public Outreach and Agency Coordination"** of this FEIS.

Comment Group 60 The ramp structure that will be constructed between Tenth and Eleventh Avenue will directly face the northern edge of Bella Abzug Park. Special attention should be paid to the facade that faces Bella Abzug Park, as well as both Avenues. We request an attractive facade, such as green elements, art, or other types of visual screening. The same applies to the façade facing the park on the deck overs. (15) The ramp structure that will be constructed between 10th and 11th Avenue will directly face the northern edge of Bella Abzug Park. Special attention should be paid to the facade that faces Bella Abzug Park, as well as both Avenues. We request an attractive facade, such as incorporating green elements, art, or other types of visual screening. Museum Garage can provide inspiration: <https://www.dezeen.com/2018/07/05/museum-garage-parking-facility-miami-design-district/> (27)

Response The DEIS does not provide detailed design specifications for key aspects of the Proposed Project, such as the façade of the ramps, facades, SSF, and the new Main Terminal. The DEIS is a regulatory document that discloses the potential environmental impacts associated with the construction and operation of the Proposed Project. This level of design requested is currently in progress and will continue to be developed beyond the environmental review process. Given ongoing feedback submitted from community members and local stakeholders regarding ramp design and facades, the PANYNJ intends to involve these stakeholders in an iterative design process.

Comment Group 61 We were very encouraged to hear of the ramp design planned for direct connections to the Lincoln Tunnel. Having a direct connection to the tunnel will decrease traffic congestion and expedite motorcoach access to the PABT. We also were encouraged to hear about the ramp design within the terminal, allowing motorcoaches enough space to bypass vehicles blocking the pathway or during unexpected breakdown situations. However, we do have some questions about ensuring there is enough visibility and that the ramps are not overly spiraled as were seemingly described during the public hearings. There can be unexpected consequences from a tightly spiraled ramp design, such as limited visibility depending on time of day from the rising or setting sunlight or the glare of headlights from oncoming vehicles, increased queuing due to slower operating speeds and tighter turning radius or forced congestion due capacity limits of the parking/storage facility. We are also concerned about the access points from the ramps to the various levels and whether the turning radius will be gentle enough to allow for easy traffic navigation as well as visibility of vehicles entering or exiting the ramp system from the bus slip or gate areas. We would like to echo the comments of other commentators with concern about the efficiency of housing the parking or staging facility 8 stories above the terminal gate facility and how long it might take to traverse those distances. As mentioned above, the hours of service are an important safety and operational aspect in motorcoach and intercity bus operations. If it takes 30 minutes to an hour to traverse the structure from the parking location to the passenger pick up area, that will have to be considered within the context of the hours of service and may impact parking usage, staffing as well as the operational service area of some companies. (19)The proposed ramp system growing from

just about 15 feet above Tenth Avenue to a whopping 146 feet with five separate over-and-under passages crossing Tenth Avenue at 40th Street is already a monstrosity. And this instead will be a single crossing at Tenth Avenue with a storage facility integrating a spiral ramp within its own equipment footprint to move buses from level to level, just as the Michael J. Quill bus facility on 11th Avenue does with a sloping parking level, like in a standard parking garage, it will lead up and down in place of a separate ramp. Having more ramp levels outside the building would only allow more idling and not change the simple facts that they -- all of these ramps lead to the same antiquated two-lane tunnel that will have the same capacity 10 years from now as it has today and as it has -- that it's had since it was built years ago. (49) My concern is this giant ramp structure, is it just going to be a giant scar essentially that destroys everything around here? Because as a pedestrian, when you walk around to the Port Authority ramps like it's basically desolate. There's no pedestrian activity, there's no storefronts, there's no -- like, they really just destroy the whole area. (68) Current plans for the ramp structure in Galvin Plaza are insufficient in their considerations of the aesthetic treatments of the new, multi-level ramp. The Port Authority must work with the community to determine appropriate architecture for the ramp structure as well determining what mitigating measures (plantings, metal lattice work over the structure, public art, etc.) will guard against an unadorned, hulking, concrete, ramp structure dominating thousands of neighborhood residents' views. (81) Consider the benefits of combining two areas: the ramp helix and the storage and staging facility. This would allow for building ramps that run through both areas, thereby reducing the slope of the ramps. Thus, the storage and staging would include both areas. The longer ramps with reduced slope might improve ramp speed. Placing the ramps inside the longer storage and staging facility would eliminate weather related problems (e.g. snow, ice, wind and heavy rain) that would affect ramp safety and speed. (91)

Response As discussed in the DEIS, Chapter 2, "Project Alternatives," (see FEIS **Appendix A**): a new ramp structure would be constructed on Galvin Plaza. Linked directly to the SSF and new Main Terminal, the ramps would accommodate all bus movements and provide direct connections to and from the Lincoln Tunnel via ramps on the east and west sides of Dyer Avenue, in the same location as the existing ramps. Specifics on ramp design such as the turning radius or whether the ramps are not "overly spiraled" will be developed after the environmental review process. The DEIS is intended to be regulatory document to disclose potential environmental impacts resulting from the Proposed Project. The ramp structure and connected bus routes in the SSF and Main Terminal, will allow buses to recirculate inside the Replacement Facility without the use of local streets. The new Main Terminal will maintain large areas for passenger circulation and amenities, bus gates, and queuing areas, making it optimal to locate ramps on the exterior edge or outside of facilities to preserve space. The space beneath the existing ramps will serve as space for bus parking, small operations, or materials storage. Furthermore, in developing the design of the Proposed Project, PANYNJ incorporated a wide range of community requests (such as avoiding the use of private property, additional capacity for the inclusion of curbside intercity bus service and increased storage and staging). PANYNJ will design the ramps to minimize impacts to the streetscape and neighborhood character helping reconnect the adjacent neighborhood and activate the surrounding areas. Sidewalks are anticipated to be widened adjacent to the Replacement Facility, with enhanced retail opportunities (nearly 12,5000 gsf) at the street-level in the base of the ramp structure. In total, the Replacement Facility would provide approximately 155,344 gsf of retail compared to approximately 158,000 gsf of retail space in the existing PABT (see DEIS, Chapter 4, Socioeconomic Conditions).

Other Design Considerations

Comment Group 62 Accessibility is another significant concern, with frequent instances of malfunctioning escalators impeding commuters' mobility in the terminal. In order for the Port Authority Bus Terminal to remain a reliable transportation hub for all individuals regardless of mobility limitations, regular maintenance of escalators and elevators must be prioritized to ensure accessibility at all times. (29) I would love to see the project put a strong emphasis on accessibility when we build infrastructure to be accessible to people with disabilities. We also, in turn enhance the experience for people with children, for people with luggage, tourists, and anybody else that would also benefit from an enhanced accessible infrastructure. (67) I'm concerned as a blind person, about how blind people will be able to navigate to the terminal. I think it's very important for Access-A-Ride, which is a para-transit service in New York City to have their own bus stop inside the terminal so just to make it easier for us kids with disabilities to basically get dropped up alongside the other buses. And maybe another alternative could be, if there could be some sort of ushers or employees that can be reached to give assistance to someone with disabilities, like for example, with the LIRR, they have their own system, where you can request assistance and get assistance on the platform throughout your whole journey. And I think it's really important that this new bus terminal be 100 percent accessible. (87)

Response The Replacement Facility, including all gates, will be designed for ADA accessibility following applicable requirements. Goal 2, "Improve the passenger experience within the Terminal," includes Objectives b and c and the use of state-of-the-art design. The Proposed Project would implement modern and ADA-compliant wayfinding designs, including accommodations for hearing- and visually impaired persons. As part of the design of the Replacement Facility, vertical circulation elements will be designed to accommodate the anticipated growth in passenger activity as well as for code compliance for emergency egress.

Comment Group 63 It is the Board's understanding from conversations with the Port Authority that Port Authority Police vehicles will be parked in the terminal. We are pleased that a car parking lot will not be part of the new terminal. Is there a plan for an off street, locked bike parking in or around the complex as is routinely done in stations and transportation hubs in other countries? How many more bike share stations will be provided based on the increase in commuters? Where will they be located? Will Citi Bike install a hub close by? The Port Authority has been very forward thinking in terms of bike parking. However, the study does not address the increased number of cyclists that will be looking to park at the terminal. (15) Please do not use any of the space for private vehicle parking. Instead, please use that space to allow for more bus capacity in the future! (94) Continue to provide parking options for cars as currently structured. Please do not take the parking options away. (115) To make the terminal more environmentally friendly, more bike parking facilities need to be set up. The new terminal should be bike friendly. (122)

Response The Proposed Project will not be providing any public parking facilities as detailed in **Appendix B.3.4 "Parking"** of the FEIS and previously discussed in Appendix 9E "Parking" of the DEIS.

A bicycle storage room would be integrated into the Main Terminal with access via an entrance located on West 40th Street or West 41st Street.

Comment Group 64 In the original conception of the project, one residential tower was proposed, 30% of which was to be affordable. MCB4 understands and agrees that the tower had to be eliminated due to structural considerations in designing the ramp connectivity from the Lincoln Tunnel Galvin Plaza exit to the Staging and Storage Facility. It must also be noted that the Staging and Storage

Facility and the open spaces are being constructed on residentially mapped land in the Hell's Kitchen subdistrict of Hudson Yards. That mapping of medium density residential use was a major achievement in the community's Hudson Yards rezoning negotiations. The Board agrees with the change in use to further this critical regional infrastructure project. However, the loss of the Tenth Avenue tower plus the mid-block land for residential use must be mitigated by designating sites for affordable housing as companion actions to this major infrastructure project. Provide sites for mixed income affordable housing development for a mix of low, moderate, middle-income housing) at the following sites: Northwest corner of Dyer Avenue and West 40th Street (NJ Transit bus parking lot, currently encumbered by bus ramps which are to be removed). Northeast corner of Dyer Avenue and West 40th Street (NJ Transit bus parking lot, currently encumbered by bus ramps which are to be removed). Northeast corner of Dyer Avenue and West 33rd Street (former proposed ventilation site for cancelled Gateway Tunnel Project). Northeast corner of Ninth Avenue and West 41st Street (current Greyhound tunnel ventilation building). With the change in the ramp structure, the Tenth Avenue residential tower was removed from the project. With the use of mid-block residentially zoned land for the Staging and Storage Facility, and the lack of a residential Tenth Avenue tower, there will be no addition to affordable housing in the proposed project. These actions must be mitigated. (15) There doesn't seem to be much of an effort to add new affordable housing. (114)

Response The PANYNJ contemplated private development to the extent that it could contribute funding to support the development of the Replacement Facility and additional improvements added at the request of the community and City of New York. While the PANYNJ supports the creation of affordable housing, it requires funding (rather than contributes), and accordingly, was not advanced as part of the program.

Comment Group 65 We wish that there was more mention and emphasis on the intermodal connections in close proximity to the PABT in the DEIS, including connections between rail, transit, intercity bus, taxis, ride-share, and others forms of surface transport. The facilitation of intermodal connections between these various modes must be a priority of any modernization project (19) Utilize the site layout and design to enhance and promote networks of multimodal transit, including additional pedestrian crossing points and protected bike lanes. (21) A comprehensive approach that extends beyond terminal upgrades, including enhancements to vital connectors such as the Lincoln Tunnel and the completion of the Gateway Hudson Tunnel, should be considered. Collaboration among NJ TRANSIT, Amtrak, and the MTA is crucial in developing a sustainable solution, especially in anticipation of increased capacity demands from initiatives like the Gateway Program and NJ TRANSIT's expansion plans. Furthermore, redirecting resources towards bolstering rail-transit capacity can help reduce reliance on commuter buses, thereby catering to the densely populated communities on the west side of the Hudson River, which constitute the primary demographic of bus ridership. (29)

Response Connections between bus terminal customers and other modes of mass transit (primarily the subway) is part of the Proposed Project's Goals and Objectives as described in **Chapter 1, "Introduction"** of the FEIS. Goal number three "Provide Seamless Passenger Accessibility" emphasizes the importance of maintaining or improving existing transit connections, as well as improving pedestrian and bicycle accessibility and circulation. Subways within the vicinity of the Project Area provide connections to both Penn Station and Grand Central Station. A taxi and for-hire vehicle pickup and drop-off zone would be provided adjacent to the Main Terminal on Eighth Avenue between West 40th Street and West 42nd Street.,.

Comment Group 66 It needs to be large enough, enough, flexible enough to support hydrogen-powered as well as electric- powered buses, single [and] double decks as well. (103)

Response The PANYNJ has worked closely with a variety of transit providers and bus operators since planning for the Proposed Project began. As detailed in **Appendix 1A** of the DEIS, the capital plans of bus transit operators, as well as private bus industry trends, were evaluated when making decisions about the design requirements of the Replacement Facility. The trends showed that buses are becoming bigger – with an increasing number of articulated buses (requiring longer passenger gates) and double-decker buses (requiring increased vertical clearances). The SSF will be designed to accommodate charging facilities for electric or battery powered buses. The specifics around other types of zero-emissions buses are still being determined as the design advances.

Comment Group 67 Please study decking over additional Dyer Ave cuts on Port Authority properties extending to West 33rd Street incorporating necessary filtration from vehicular traffic. (15) Deck over additional Dyer Ave cuts extending South to 33rd St between W.36th & W.37th, W.35th & W.36th, W.34th & W.35th, and W.33rd & W.34th Streets) to reconnect neighborhood side-streets east to west and create a green 'though-fare' W.39th to W.33rd, effectively creating north to south pedestrian passage that links PABT to Manhattan West (and the Highline Connector) alleviating pedestrian congestion along 9th Ave (Southbound), reducing vehicle emissions from tunnel traffic into the neighborhood, and providing addition park surface area for the impacted community. Extend decking to 10th Ave between w38th-39 for additional public green space, thus reducing vehicle emissions from the tunnel into the neighborhood, creating greater east/west connectivity from 10th Ave, and providing addition park surface area/green space. Lincoln Tunnel gantry tolling system can either be moved to the NJ side or wired to surface-level relay (addressing PA's direct 'line-of-site' issues). Deck over additional Dyer Ave cuts (extending to 33rd st) to reconnect neighborhood East to West and create a green 'though-fare' from W.39th to W.33rd, effectively creating North/South pedestrian passage that links PABT to Manhattan West and the Highline Connector. Deck over additional Dyer Ave cuts on Port Authority properties extending to W.33rd St incorporating necessary filtration from vehicular traffic. (116)

Response The PANYNJ does not have plans for additional decking efforts.

Comment Group 68 Section 7.5.3.3 states that the private development would use bird-friendly materials and lighting. EPA suggests the document make clear that the terminal building will also be built to the same specifications. (5) Please Study: Please study using bird-friendly glass and windows with a frit-dot pattern in all buildings. These materials will also make the buildings easier to heat and cool, reducing energy needs. (15) I'd greatly appreciate it if you could align the design of this building with the natural features of the environment. Let's avoid constructing structures that pose a threat to birds or endanger wildlife in any way. (34) I want to be sure that birds will be safe, that any glass panels will be identifiable to the birds, so they won't crash into these glass windows and die. (37) Please make sure the building glass is not harmful to birds. I hope for you to plan the new bus terminal with bird safety in mind. (38) Are the design, windows, and building materials bird friendly. (41) Please consider using only bird-friendly building design, ie minimizing use of reflective glass. As a New Yorker and birder, I have been witness to countless bird strike victims. Millions of birds die every year in cities like NY, Chicago and Miami due to deadly glass buildings. Birds cannot see glass and believe the reflection is a continuation of trees and sky. Visit NYC Audubon to learn more and save the birds we all depend on for survival and sanity. (42) Today there are solutions available that make glass visible to birds, options for bird-friendly construction materials, and a multitude of ways to design buildings to minimize their risk of harming birds. The glass facades of modern office buildings are not only dangerous to birds; they can also dramatically increase energy consumption

Appendix C. Summary of Comments and Responses

for heating and cooling. As a result, bird-friendly design elements are now often considered an integral part of sustainable design. (47) I didn't see any mention of using those bird friendly windows. I looked at the website for the New Port Authority, and I didn't see any mention of using bird friendly non-reflective glass. And there's going to be a lot of glass. Up to 230,000 birds die every year in New York City. A lot of them when they're migrating in New York City alone, mainly due to crashing into reflective glass windows, disorient--disorienting, bright light beams in the sky are also a major cause of collisions. Please be responsible and do the right thing. Please install bird friendly glass. Please have a bird-friendly building design and be mindful of nighttime artificial lighting. (55) I looked at the website for the New Port Authority and I didn't see any mention of using those bird friendly windows. Please be responsible and do the right thing. Please install the bird friendly glass. (56) Please make sure that glass used on the construction of the new terminal is safe for both migratory and resident birds. Please visit this link from the Audubon society for further information. (59) Please consider bird safety when building this new terminal. Flaco the owl just died from hitting a window. Please take steps to mitigate this kind of tragedy from happening in the future. (60) 'I'm calling with concern about the safety of birds crashing into buildings, particularly if there's a lot of glass. My request is that you please make the glass so the birds can see it and they won't crash into it. So, make it bird friendly. (62) Please consider the environment and have bird-safe glass. Be a leader and an example for future buildings. (64) Please make the windows and lighting safe for birds. Thousands of birds die yearly from collisions with see-through glass or due to confusion mid-air thanks to lighting and building facets that make it hard for them to see. Please take the safety of local wildlife into consideration when constructing the new terminal. (65) Please use the best and most current practice building materials and designs for bird safety that will prevent building strikes from both migrating and local birds. Especially surrounding the green areas. (71) Please use the highest available building standards to prevent bird strikes, injuries & deaths. We must step up to protect wildlife from the unnecessary harm of human indifference. Thank you for leading with wisdom. (82) Please make the new PA terminal bird safe and friendly in memory of Flaco and countless other birds. (85) Please use bird safe glass! The DOE uses it when it replaces school building windows and it looks good. It should be required for all projects. (89) Bird safe glass is a civic responsibility. Do it. Don't cause thousands of bird deaths per year; prevent them. It's the right thing to do. (90) Please make sure that this is a "bird safe" building with a plan to reduce the lighting to prevent bird strikes and deaths, particularly during migration periods. (97) I'm calling about the tragic situation of birds being killed by going against glass windows in New York. Apparently, a billion. So please work on something with the windows so the birds are safe. (101) In the wake of Flaco the Eurasian eagle-owl's death, you may be receiving many comments about installing bird-safe glass and windows. Please consider taking measures to mitigate dangers presented to these beautiful creatures as they travel through the area, whether it's installing specialized glass or other measures that deter collisions with manmade structures. Thank you. (110) Let us be aware not only for ourselves but all living things Birds helps the environment, let us help them survive be bird friendly in buildings parks and community. (112) Please use glass that is bird friendly. Flaco's Law is alive and well. We have to protect our wildlife in our decisions and development. (118)

Response Appendix 7A, "Natural Resources" of the DEIS (see FEIS **Appendix A**) discussed bird safety, and measures to prevent bird collisions. In Section 7A.5.3.2 (Wildlife). The DEIS noted the following measures that the PANYNJ would incorporate into the design of the Proposed Project :

Per FAA regulations and recommended best practices for urban areas, the two towers would be marked with red obstruction beacons using light emitting diode (LED) bulbs instead of traditional incandescent bulbs, which reduces bird disorientation and collision risk.

“Bird-friendly materials” would be incorporated, consistent with New York City Local Law 15 (2020) and NYCBC. The City defines bird-friendly materials as those with a threat factor rating of 25 or less, according to the ABC “Bird Collision Deterrence Material Threat Factor Reference Standard.” The ABC database defines bird-friendly materials as having the following characteristics: patterns on glass; louvers, screens and wires installed in front of glass; glass with an ultraviolet (UV) pattern transparent to the human eye but visible to birds (NYC 2021).

Comment Group 69 Please confirm that the dog run will be allowed to operate in their current space until construction makes it absolutely necessary to vacate and we request consideration for more than the 30-day notice published in the DEIS, if possible. (15) Astros Dog Park --we are a green space that it's being displaced by the Port Authority Project that's not been considered or offered a new space. It's a travesty for the neighborhood to lose Astro's green space and the benefits to the community as we do not have a temporary home once construction starts on our lot. (49) I'd like to recommend keeping Astros dog run open. The park is gated, all dogs have to be up to date on all vaccinations before a key is given to the dog owner. It's like a little community as we have BBQ's during the summer. Not to mention a space for our dogs to run and play safely. The park is always well maintained with trees and flowers. (53) Please do not remove Astros dog run! Our community needs this more than we need this bus terminal. (73) I have been a long time member of Astro's Dog Run which will be closed due to the PA Bus replacement project. I would like to see accommodations made for a replacement dog park in the new plans. (84) I am also a member of Astros Community dog run and hope that we can 1) stay open as long as possible until construction crews arrive to the space and 2) that we can find a replacement dog run soon. (114)

Response The PANYNJ will work to allow Astro's Dog Run to remain operational as long as feasible until construction activities (or preparation for those activities) require that the site be closed. The PANYNJ looks forward to working with the community and users of the dog run to develop the design of the new publicly accessible open space atop the Dyer Deck-Overs, which may present an opportunity for new space or programming for dog owners.

Comment Group 70 Replace the public open green space, known as Theresa's Park West of Metro Baptist and 409 West 39th Street, (approximately 30 x 200 feet), under a specific timeline. Please Confirm: The Board understands from conversations with the Port Authority that the small green area on the north side of West 39th Street, east of the bus staging (Theresa's Park), will be restored as green space with the same or larger square footage. Theresa's Park and Astro's Dog are both misidentified in the DEIS as private open spaces and therefore excluded from the direct effect analysis. In fact, both are public community managed open spaces and direct effects need to be analyzed. (15) Incorporate maintenance requirements into the commercial developments so that the new 3.5 acres of open space will be supported by a financial agreement with the developer in perpetuity. (Parallel mechanisms were established at Battery Park City Authority through ground lease obligations.) The agreement should stipulate open space requirements that are consistent with City agreements for Parks, maximizing usability by the public and minimizing commercial use. (21)

Response Astro's Dog Run is located on PANYNJ property commonly referred to as Galvin Plaza and its use is designated as “Transportation & Utility” on New York City's Zoning & Land Use Map (ZoLa). Currently, the Hell's Kitchen Neighborhood Association, Inc. maintains Astro's Dog Run and provides access based on an annual membership fee. Through a revocable space permit, PANYNJ granted use of Astro's Dog Run to this Association for use as a dog run. Theresa's Park is also on a lot owned by PANYNJ and with a use designated as “Transportation & Utility” on New York city's ZoLa. A chain-link fence on West 39th Street provides a gated entry to a landscaped sitting area with a key obtained from Manhattan Community District 4. Through a revocable space permit, PANYNJ granted

use of Teresa's Park to Hell's Kitchen Neighborhood Association Inc. for use as a community garden. PANYNJ recognizes these areas as temporary occupancy of parcels used for a transportation use. Since neither is open to the general public and are only accessible by key or paid membership, pursuant to guidance in the CEQR Technical Manual and NEPA, they are considered "private" open space and are excluded from the direct effects analysis. The future maintenance and operations of the Dyer Deck-Over open space is to be determined and will be developed as the design of those spaces advances. The PANYNJ has been and will continue to be committed to engaging with the community and local stakeholders about the design and operations of the Proposed Project. As the design advances, the PANYNJ will continue to provide updates to the community and opportunities to provide input on design and facility operations.

Comment Group 71 Additional Green Open Space – Delivered in Phase 1 of the Proposed Project. Build a deck-over to create public open green space on west side of West 35th Street and Dyer Avenue in Phase 1. Create a greenway path on West 36th Street from Dyer to Tenth Avenues to continue the Canoe Plaza. Create a greenway path on a widened sidewalk on the north side of West 39th Street (Ninth-Eleventh Avenues) with a design similar to the "Canoe" (small, planted plaza, West 36th and Ninth Avenue). Consider adding open green space immediately at the start of the project to mitigate air quality impacts in a district which experiences the third worst air pollution in the city. Please Study: extending the decking to Tenth Avenue between West 38th and West 39th Streets for additional public green space, thus reducing vehicle emissions from the Lincoln Tunnel into the neighborhood, creating greater east/west connectivity from Tenth Avenue, and providing additional park surface area. Lincoln Tunnel gantry tolling system can either be moved to the New Jersey side or wired to surface level relay (PA's direct 'line-of-site' [sic] argument is easily solvable). Please study expanding the open space to include Port Authority properties along Dyer Avenue West 33rd-34th Streets, West 34th-35th Streets, West 35th-36th Streets, and West 36th-37th Street, between Ninth and Tenth Avenues, including connectors to West 37th Street. This will create a green "way" and connect the PA's open spaces with Manhattan West, which is a connector to the High Line. This expansion would give visitors and residents urban green space in our neighborhood for the next 20 years, while waiting for the future parks. Perhaps more importantly, this will provide clean, open areas to help mitigate the short-lived climate pollutants generated by construction in an area that registers some of the worst air pollution in the city. The community objective has long been to both reconnect the neighborhood east west but also create a North South greenway/pedestrian path from West 39th to West 33rd Streets. This would provide additional pedestrian pathways between the PABT and points south, including access to the Highline connector alleviating pedestrian crowding along Ninth Avenue. (15) [Request that the PANYNJ] Agree to develop, implement, and provide an Open Spaces Maintenance and Funding Agreement with the Hudson Yards/Hell's Kitchen BID for maintenance, capital maintenance, and operation of all public open green spaces by dates tied to PABT construction milestones. (27) Lastly, I love the idea of lidding some of the tunnel area to provide a park area, but it might be an even more clever idea to repurpose some of the largely empty bus parking areas to the same end. (35) Create additional public green space on PA property & land as part of an adjacent to proposed PABT replacement project. Public open green space is intended to address community calls for improved air quality, neighborhood connectivity, and much need public open green space. The promise of converting decked staging structure spanning W37th-W38th Streets & W38th-W39th Streets over Dyer for future green space is a good start. (116)

Response The Proposed Project will add approximately 3.5 acres of new publicly accessible open space to the area. While the PANYNJ understands the need for additional parks and public open space in the surrounding area, the PANYNJ is not responsible for providing parks or open space outside of its properties and does not have available funding to further expand decking over other sections of below-grade roadways. Many of the existing surface parking lots around the PABT, owned

by the PANYNJ, are used for bus parking and will be incorporated into the new Replacement Facility. Other lots, not owned by the PANYNJ, may continue to be used for bus storage by bus operators.

Comment Group 72 EPA recommends that FTA consider alternative beneficial uses for open spaces such as facility roofs. Community open spaces provide significant economic and public health benefits (<https://www.epa.gov/G3/green-streets-and-community-open-space>) and green roofs can provide benefits to air quality, energy use, and stormwater management among others (<https://www.epa.gov/heatislands/using-green-roofs-reduce-heat-islands#types>). EPA recommends the document state if the private developments are subject to the PANYNJ's sustainable building guidelines and that the document include which local laws govern energy and gas use within the proposed developments. EPA recommends that FTA and the project sponsors identify efforts that can be taken to reduce energy demand in the terminal and the private buildings. EPA encourages FTA to develop measures to reduce water consumption where appropriate. (5) Please Study the creation and use of green roofs as an environmental asset. Please study if the significant rooftop areas of the PABT Main Terminal, the SSF, and proposed ramp structure (working off recommending that ramp structure be fully enclosed) could be utilized to create a publicly accessible roof-top park that spans Eighth to Eleventh Avenues (similar to San Francisco's Salesforce Park spanning their transit hub). Agree to implement a combination of solar panels and green roofs of Main Terminal, Staging and Storage Facility, and Galvin Plaza Ramp Structure to provide power, absorb rainwater runoff, provide insulation, and decrease urban heat island effects. Agree to implement water retention tanks to absorb rainwater runoff from roofs of Main Terminal, Staging and Storage Facility, and Galvin Plaza Ramp Structure and use retention tanks to irrigate new public open spaces. Since the Port Authority is looking to achieve net zero emissions and taking environmental sustainability very seriously, Please Study: The terminal and/or staging/storage buildings should be equipped with indoor, off-street, fast-charging EV charging stations for their delivery and service trucks and make them available to the public (for example in loading bays) without a prerequisite parking fee. Please also study incorporating CO2 capturing building materials into PABT Replacement structures (such as photocatalytic concretes). What is the rooftop storm-water management plan? Please Study: We understand that all bus gates and parking will be able to charge electric buses. Please study an operational model that gives incentives to carriers to convert to electric as early as possible. Please expand on your plans to use low carbon and carbon negative building materials and non-porous materials for enclosed ramps. (15) The terminal should be as energy efficient as possible; this can be done by conducting Computational Fluid Dynamic Modeling (CFD). CFD modeling will provide valuable data to ensure the HVAC system is designed to the most effective and efficient manner, taking into account the ventilation rates, solar heat gain and radiance from all the glass being proposed for this building. The glass of the building should be seriously reconsidered due to the extremely low R values of the exterior walls. (17) With an emerging interest in zero emissions commercial vehicles and efforts to transition commercial fleet operations on an unprecedented timeline, we do not see similar reflections or acknowledgement of these types of operations being integrated into the Project. We strongly recommend the DEIS address the parking and charging of ZEVs in this project. (19) Consider how the entire building system, inclusive of accessible green roofs, electric charging infrastructure, and other sustainable features, can be creatively designed and integrated to minimize energy use and mitigate the carbon footprint. Consider how the reuse and upcycle of materials on site can further minimize the embodied carbon of the project. (21) As the bus industry converts to largely zero emissions vehicles (ZEVs), the new Port Authority Bus Terminal must include adequate facilities for the charging and fueling of these vehicles. Intercity vehicles will require charging between trips, and the most efficient way to do this would be during disembarkation and boarding at terminal stations like the Port Authority Bus Terminal. Any modern facility must include these chargers for intercity and regional bus services. This will also minimize the effects on the surrounding neighborhood and environmental justice communities. We applaud the Port

Authority's plan to accommodate these buses in the Replacement Facility, as stated in Appendix 10D. (30) We note the future of bus operations will include electric fleets, and the proposed plans assure carriers can provide the riding public with the advanced technologies being planned at the PABT. LEED certification, HVAC advanced systems and more most assuredly will replace the outdated and legacy infrastructure of earlier years. As carriers look to the future of electrification and alternative fuels, we look forward to charging infrastructure provisions, including high-speed overhead pantographs, or connectivity via a standard CCS charging connector. We also look forward to access and egress for alternatively fueled vehicles such as CNG and Hydrogen and the fire suppression systems necessary for safe passenger operations. (31) In terms of sustainability, I really enjoy the idea and the proposal to have the sustainable buses, including buses that have bike racks in the front. I think that's a forward thinking and a long-term solution to emphasizing micro mobility in the plans. (67) Roof of the terminal and storage facility to be green roofs, along the line of the Javits, with rooftop farm space to offset loss of light, due to over-shadowing, to adjacent building rooftop farms and gardens. Those who are impacted by loss of light should have access to a green roof on the storage facility to farm and garden there. (75) A mandatory shift to ZEV buses in the new terminal is necessary and would reduce point indoor and outdoor emissions to zero (99) The structures, whatever their ultimate design, target a rock-bottom LEED Silver designation. (100) Utilize significant rooftop area of PABT Main Terminal, SSF, and proposed ramp structure to create a publicly accessible roof-top park that spans 8th Ave to 11th Ave (similar to San Francisco's Salesforce Park spanning the roof of their transit hub). This massive community space would dramatically improve the neighborhood's quality-of-life providing much need accessible green space and creating a dramatic destination for residents, commuters and visitors to NYC, as well as providing outdoor space for the proposed future commercial towers on 9th Ave. Incorporate CO2 capturing building materials into PABT Replacement structures (such as photocatalytic concretes). (116)

Response PANYNJ is supportive of sustainability efforts and encourages projects to follow United States Green Building Council LEED guidelines. The Replacement Facility would be designed to achieve a minimum of a LEED Silver rating and an Envision Gold rating is anticipated to be pursued for the components of the Proposed Project that are subject to PANYNJ's Sustainable Infrastructure Guidelines, including the Dyer Deck-Overs.

On October 28, 2021, PANYNJ announced a new set of policies to commit the agency to achieving net-zero GHG emissions by 2050 and set a goal of cutting direct emissions in half by 2030. That announcement also indicated PANYNJ's intent to establish a net-zero vision for the PABT replacement. PANYNJ is committed to upholding the tenets of the Paris Climate Accord by committing to a 35% reduction in direct emissions by 2025, and an 80% reduction in total emissions by 2050. The Replacement Facility would be designed to accommodate all-electric bus fleets and adopt design features and technology to drive toward net-zero to the maximum extent practicable. The design of the Replacement Facility would provide for the installation of electric charging infrastructure to support the conversion by carriers to electric buses. As PANYNJ works out the requirements and provisions for the Replacement Facility, PANYNJ will evaluate opportunities to achieve these goals.

Green roofs are planned to comply with Local Law 97/98.

The PANYNJ will not provide subsidies or incentives to other transit operators or private bus companies as a matter of policy. Further details about green or sustainable building designs and practices will be provided to the public as design advances. The design is intended to accommodate modern bus fleets, including electric bus charging. The EIS analysis does not assume that there is a reduction in emissions from any transition of bus fleets to ZEV in order to create a more conservative analysis.

Comment Group 73 Agree to enlarge the sidewalks on the east side of Ninth Avenue, on the north side of West 39th Street, (Ninth to Eleventh Avenues) West 36th Street (Dyer to Tenth) West 40th Street (Dyer to Ninth) and Dyer Avenue (West 40th /West 41st). Agree to install mid-block raised crossings on West 39th Street (middle of the blocks Ninth to Tenth and Tenth to Eleventh on West 37th and West 38th Streets (middle of block Ninth to Tenth) all to service parks crossings. At NW corner of West 41st and Gavin Plaza, agree to install a neck down in place of the striped area. At the West 40th Street entrance agree to install a long neck down to serve the entrance on West 40th Street. Most of the intersections on Eighth Avenue should be equipped with Barnes' dances (where all signals are red simultaneously at a given intersection). Agree to reduce signals' green phase on Ninth, Tenth, and Eleventh Avenues and at 40th Street and Ninth Avenue at the approaches of the tunnel. Agree to retain the service with at least 15 pedestrian traffic managers at peak hours. Agree to install cameras on city streets to monitor Lincoln Tunnel vehicular queues and noise, based on community input. Work with the MTA to improve crosstown M42 bus service. (15) Dyer Ave is also very dangerous for pedestrians, and it needs wider sidewalks and safety bollards to shield pedestrians from careless drivers exiting the tunnel. (35) I would love to see red light speed and acoustic cameras implemented around the project. As a pedestrian, as somebody who uses the facility, who lives in the neighborhood, there are issues with pedestrian safety in terms of cars and trucks and buses running red lights, blocking pedestrian walkways, including the crosswalks and using horns illegally. (67)

Response The EIS provides the mitigation strategies that are under consideration for impacted pedestrian elements in **Appendix B.4.3 "Pedestrian Conditions."** Mitigation of sidewalk impacts can be achieved by a number of means depending on the specific characteristics of each sidewalk. Mitigations might include relocation of curbs or building lines (the latter typically achieved during the design process), or removal or relocation of elements that are impeding pedestrian flow on a sidewalk. Crosswalks may be widened to increase capacity or shortened to reduce crossing time, or walk signal time may be increased. Mitigation of corner impacts may be addressed by removing objects that take up space on a corner, enlarging the corner by applying "bulb-outs," or setting back a building façade (on a project site).

The PANYNJ will have cameras that provide and information regarding traffic conditions and provide real-time updates to terminal and bus operators. Specific plans for pedestrian managers or traffic agents have not been determined for operating conditions (i.e. post-construction). The PANYNJ is not responsible for enforcement of local laws / regulations on city streets and does not have jurisdiction to install either red light cameras or acoustic cameras for the purposes of enforcement of local laws or regulations.

Comment Group 74 It would be useful for the new terminal to have pedestrian overpasses from the second floor over 8 avenue and also 42 street to reduce the pedestrians crossing those streets at street level. (50)

Response Pedestrian overpasses present multiple challenges and complexity and were not considered an appropriate or needed component of the Proposed Project.

Comment Group 75 We urge the PANYNJ to form an advisory committee or working group of major intercity bus carriers, including Greyhound, to work with project management on critical needs during all phases of the project, including refinement of planning alternatives, detailed design, value engineering, right-of-way acquisition, and maintenance of traffic during construction. This

collaboration can only help lead to more efficient and effective outcomes and prevent unanticipated problems. (18)

Response PANYNJ is committed to coordinating with agencies and intercity bus operators to address critical needs during all project phases. While PANYNJ is unable to form an advisory committee or working group at this time, PANYNJ will ensure that ongoing communication and collaboration remain a top priority.

Comment Group 76 Community Board Five is aware that eastbound traffic from the Terminal has the potential to impact our streets and is anticipating seeing and understanding the effects of removing curbside bus operations from our district, if achieved by 2032 as planned. (14)

Response The purpose and need of the Proposed Project is to accommodate both forecast growth of demand for bus services as well as increase capacity to accommodate intercity buses operating at curbside locations adjacent to the PABT. Analysis in the EIS (see **Appendix B.4, 'Transportation'**) showed that without the increase in capacity and operational improvements associated with the new Replacement Facility, there would be an increase in the number of buses that could not be accommodated in the existing PABT, with many instead operating at curbside locations. EIS analysis shows that the creation of the Replacement Facility can accommodate forecast demand by 2040, while the No Action Alternative would require several hundred peak hour buses to find alternate (non-terminal) locations to operate.

Comment Group 77 East side of Ninth Avenue between West 40th and West 41st Streets: provide an agreed-on number of commercial storefronts of square footage scaled for neighborhood retail and service use. West side of Ninth Avenue between West 40th and West 41st Streets; provide an agreed-on number of commercial storefronts of square footage scaled for neighborhood retail and service use. West side of Ninth Avenue between West 40th and West 41st Streets; provide entry storefront and location for a full-service supermarket for the Hell's Kitchen neighborhood. Agree to install retail at the NW corner of Tenth Avenue and West 39th Street. (15)

Response The PANYNJ is committed to having a diverse and engaging retail program which serves the needs of travelers, workers, residents and visitors. The design and tenanting / programming of the retail space is underway and the PANYNJ cannot provide specific number of retail "units" or specific uses at this time. For the specific location of the northwest corner of Tenth Avenue and West 39th Street, the PANYNJ will review the dimensions of the space available for programming; if the space is determined to be insufficient for retail, the PANYNJ will explore if other uses are possible.

Comment Group 78 Reserve space for affordable community facilities in the Main Terminal, Staging and Storage Facility, and Galvin Plaza Ramp Structure. Provide detail by location with specific square footage and schematic plans. Agree that every community facility space will be white-boxed and outfitted with HVAC equipment and ADA bathrooms. Establish affordable rent structures for different types of community facility uses, including active recreation for teens, day care, rehearsal space for non-profit theaters, and a Community Board office. Provide ADA access on all floors for the Rauschenbusch Metro Ministries Community and Social Service Center. (15)

Response The PANYNJ intends to have a diverse and engaging retail program which meets the needs of both commuters and the surrounding businesses and residential communities, while also advancing the goals of the PANYNJ. Specific retail uses have not been determined at this time, but the PANYNJ will continue the dialogue with community groups about preferences for retail uses and programming. The PANYNJ will review opportunities to program retail uses where it can be viable

and serve resident, workers or visitors. The PANYNJ does not intend to make any discretionary improvements to private properties that are not directly required in order to implement the Proposed Project.

Comment Group 79 Agree to provide a green wall on the eastern face of the West 40th Street Storage and Staging Facility and ramps. Overall Community Greening. Plant trees every 25 feet on all sidewalks adjacent to the property interspaced between bollards. Install green walls on the south façade of the Staging and Storage Facility and the Galvin Plaza ramp structure between Ninth and Eleventh Avenues. Engage in a street tree planting program throughout the impacted area. Please Study: Designing and planting a robust street tree canopy as well as considering dense above street and vertical greenery will provide both important environmental benefits and a pleasing aesthetic. Please Study: The brick wall fronting Ninth Avenue (and 41st Street) needs to be replaced with something more attractive or eliminated entirely. Please provide renderings similar to figure 6C-19 for the east side of Ninth Avenue between 41st and 40th Streets. (15) According to the rendering on 6C-19, this project is not impacting the southwest corner of 9th Avenue at West 41st Street (the very far right side of both images). This particular spot is in terrible condition and should be a capital reconstruction as part of this project. (27) All outdoor infrastructure should be pigeon-proofed to prevent pigeons from defecating on public rights of way. Currently, there is no publicly accessible sidewalk on the south side of West 41st, between 9th Avenue and Dyer Avenue. There is a physical pass-through on Port Authority property, but it is closed and inaccessible to the public. It appears that this project would remove that pass-through without replacing it with something else. Two problems need solutions: There needs to be a publicly accessible sidewalk on the south side of West 41st Street between 9th Avenue and Dyer Avenue. The brick wall fronting 9th Avenue (and West 41st Street) needs to be replaced with something more attractive or eliminated entirely. (27) I would love to see street trees with large tree pits and tree guards around the periphery of the projects and limited to no parking. (67) Plant trees along W36th between 8th & 9th Aves and invest in carbon capturing technology to offset vehicular emissions along the street. Mitigate necessary programmatic massing through the use of transparency (glazing) allowing for visual connection between Hell's Kitchen North & South, scaling elements/details, large-scale art along all exterior structure to avoid appearance of monolithic elevations imposed on neighborhood. PABT should not look like a shopping mall! Address pedestrian & neighborhood connectivity and circulation (East/West & North/South) through design considerations of both the Terminal Replacement Project and adjacent PA lands/Infrastructure. Dyer Avenue's Lincoln tunnel access has long divided neighborhood connectivity East to West, the scale & massing on the proposed PABT Replacement Terminal, the SSF, Ramp structure, and avenue spanning overhead ramps will potentially have similar impact North to South as it runs from 8th-11th Avenues. Incorporate green natural elements, such as green walls, accessible rooftop public green open space (such as Salesforce Park, San Francisco) on all PABT replacement project structures. Addition of street level/surface trees surrounding PABT Replacement Project and green open public space. Please note DEIS routinely refers to Dyer deck-overs as future public open space, please clarify in EIS that this is to be green open public space. (116)

Response The PANYNJ has prioritized enhancing the public realm since planning for the Replacement Facility was initiated. The Proposed Project will create many improvements to the public realm by allowing buses currently operating from adjacent streets to be accommodated within the new Main Terminal, allowing buses to circulate between the Lincoln Tunnel, the SSF and the new Main Terminal without the use of city streets and creating a facility with both improved functionality and aesthetics. Street level retail throughout the Replacement Facility will help activate streets and, sidewalks surrounding the Replacement Facility will be widened and improved. The partial closure of 41st Street between Eighth and Ninth Avenues, will allow the new Main Terminal to be a unified and attractive building, and serve as a civic anchor, worthy of being at the Crossroads of America.

The PANYNJ does not anticipate creating green walls due to the operational challenges and maintenance expenses they require. The SSF and new Main Terminal will have green roofs in compliance with Local Law 97/98.

The Proposed Project does not currently include any improvements to the intersection of Ninth Avenue and West 41st Street but the PANYNJ is considering if there are options that could be developed in response to this and similar comments.

Comment Group 80 Please describe the material placement and installation methods that will be employed to assure public and property safety. (23) Crime and Anti-Social Behavior – the neighborhood around the Midtown Bus Terminal is an area typically associated with high levels of crime and anti-social behavior. Please describe how PANYNJ will address the displacement of this population and mitigate displacement to surrounding areas. Please also describe how these issues will be addressed during operation of the interim bus terminal. (23) Will there be a plan to provide ongoing security and maintenance of any areas left accessible to public/pedestrian activities? (32) As well as police officers walking all around the building from 7am - midnight at least. There are ample homeless and other non-bus taking individuals lingering on 8th Avenue which is also a problem for safe access to terminal. (76) So many homeless, other panhandling harassing people. I also have business and lots of our customers are afraid to come to port authority bus terminal. (107)

Response Safety and security systems with the ability to monitor conditions throughout and around the Replacement Facility will be implemented. Systems will include visual surveillance, public address systems, and access controls, with systemic redundancy created between the SSF and the Main Terminal. The specifics of these systems are being developed through a TVRA and used to inform the design. As it does with all properties, the PANYNJ will collaborate closely with NYPD for general public safety but cannot disclose specific details about security operations.

The PANYNJ will continue to provide outreach and referral services to individuals experiencing homelessness at the PABT and the New York side of the Lincoln Tunnel during construction. Additionally, assistance programs currently offered by social service organizations serving the PABT include access to detox programs, shelters, drop-in centers, and travel assistance in specific case needs. These programs would continue to be available throughout the duration of the development of the Proposed Project.

Comment Group 81 Please study installing fully solar lighting on the outdoor pathways, for both the green spaces and the sidewalks. (15)

Response Comment noted.

Comment Group 82 We request that you study the use of waste level sensors to help monitor and track waste containers. This also provides remote alerts and makes waste removal more efficient. Please evaluate the use of separated trash and recyclable deposit chutes in the public areas (pneumatic waste pipes). This will cut down the need for trash bins and streamline waste to a central location. We request that you study the use of trash compactors to reduce the volume of solid waste, both in the transit facilities and the commercial office buildings. Please study the option to use a combination of permeable pavement and bio- swales to reduce runoff volumes of rainwater and melting snow. This low cost, less labor-intensive, and environmentally friendly approach will help alleviate street drainage systems, aid in storm-water separation from sewage. In addition, please study the longer-term issue of piping storm water without sewage directly into the estuary. Building dual pipes for storm water separated from sewage in new construction and under the streets and

piping storm water directly into local water bodies is a vital environmental issue for the future of the city. (15)

Response The EIS is intended as a regulatory document to disclose potential environmental impacts resulting from the Proposed Project. These operational comments are beyond the scope of this evaluation. Incorporate flexibility into the program to enable agile adjustments should the need arise in Phase 2 or Phase 3. Further study slight shifting of the location of the towers and adjusting of the massing to decrease impacts. Design the form of the towers in a way that mitigates visual impact on the McGraw-Hill Building, such as using chamfered corners as proposed by the New York State Historic Preservation Office NYSSHPO. When developing the designs for the towers, ensure they are contextual to the neighborhood fabric, including forthcoming surrounding development as well as the McGraw-Hill Building, with tactics such as reducing height where possible and incorporating setbacks as much as possible. Include criteria in the RFP for the development to design with sensitivity to the McGraw-Hill Building. (21) We understand that PANYNJ is proposing “to prepare an Historic American Buildings Survey photographic recordation of the exterior of the McGraw-Hill Building” and to create “interpretative displays regarding the McGraw-Hill Building and its innovative high-rise design” as a form of mitigation. Surely, it would be better to be able to see the building’s innovative design from 8th Avenue, than to be treated to an “interpretive display” about the innovative design which is no longer visible. In an attempt to help the building remain visible, we echo the NYSHPO’s request that the design of the private commercial towers include chamfered corners so that they do not butt up against the McGraw Hill Building. (26)

Response As detailed in the final Programmatic Agreement, **Appendix B.2.2** of the FEIS, FTA in coordination with PANYNJ will consult with NYSHPO, NYCLPC, and NPS on the design of the proposed Main Terminal and commercial towers to seek to further minimize and mitigate shadowing effects on the McGraw-Hill Building’s historic features. This group of Concurring Parties will also review all mitigation measures as outlined in the Programmatic Agreement. A view analysis, performed as part of the Section 106 Consultation process, also showed that the Proposed Project would result in a new or improved view of the McGraw-Hill Building from the southwest, through the addition of the publicly accessible open space created on the Dyer Deck-Overs.

Comment Group 84 We agree with our colleagues at the Municipal Art Society that private development towers of any height on this site should not be fully commercial as proposed but should instead incorporate a flexible program that could include housing, ideally affordable housing. (26)

Response Private development is intended to generate funding for the project; affordable housing does not generate funding and thus was not advanced in the Proposed Project.

Comment Group 85 One of the biggest issues impacting commutes is the time the bus sits in bumper to bumper traffic on the approach to the tunnel, in the tunnel, on the ramps, and during disembarking, increasing the commuting time. A related issue is the air pollution during the above times as well as inside the terminal. (99)

Response The design of the Replacement Facility improves bus operations, which should increase service reliability and reduce delays in the following ways, as detailed in **Appendix B4.1, “Bus Services,”** of the FEIS. First, the new ramp structure will provide direct connections from the Main Terminal and SSF to the Lincoln Tunnel, allowing buses to avoid using local streets to connect from the tunnel to the terminal. Secondly, the new ramps will be widened to allow for a bus to maneuver around another bus, should that bus become stalled or disabled on the ramp (a condition that does not exist today). Lastly, by allowing bus recirculation within the terminal, without having to use local city streets, buses will avoid contributing to gridlock, which can result in backups

reaching from the terminal to the Lincoln Tunnel, causing slowdowns for traffic at-large. Reduction in bus delays and congestion, within the terminal and on adjacent streets (through off-street ramps and direct connections from the Lincoln Tunnel and the Main Terminal) would reduce the amount of time buses spend idling in and around the terminal.

Comment Group 86 Agree to reducing width or removing one bus lane on the 40th Street bridge in order to provide more space and light to the Metro Baptist Church. (15)

Response The ramps are necessary to provide a direct connection between the Lincoln Tunnel, SSF and new Main Terminal and, thereby reducing the amount of on-street bus movements. The ramps also must meet engineering requirements related to slope, turning radius, clearance, etc. which result in the configuration of the ramps as proposed. The width of this connection must be sized sufficiently for one bus to maneuver around another bus should it become disabled and block a travel lane. As design advances, PANYNJ will consider all opportunities to make modifications that improve the public realm or limit effects of the Replacement Facility, provided they also do not reduce or compromise facility operations.

USE OF PRIVATE PROPERTY

Comment Group 87 Any discussions were had with Silverstein properties, which owns the almost full block of land adjacent to the north tunnel entrance between 40th and 41st streets and 11th Ave and Galvin Ave? It feels like that could have been a great additional storage facility with connections to the new ramp structure going across 40th street. And it could be built with the capacity for Silverstein to build a development on top, which has been proposed and shelved multiple times over the last decade. This would add future capacity as the bus terminal ridership grows, and part of what is currently planned as the storage facility could be repurposed to additional customer facing bus gates, with commuters accessing it from the main terminal through the 2nd floor connection that won't have bus traffic. (66)

Response The PANYNJ is following a public commitment to site as much of the Proposed Project on its own property as feasible and avoid the use or incorporation of private property.

CONSTRUCTION

Comment Group 88 The area studied should be increased to include 400 feet east of Ninth 9th Avenue from West 30th Street to West 48th Street. That area contains approximately 2,000 residential apartments. Therefore, mitigation measures must extend to residential uses in that area. (15)

Response For environmental analyses, an impact assessment study area is typically created for a project site (e.g., limits of construction) and a larger buffer area surrounding the project site to account for potential direct or indirect impacts. Study areas relevant to each analysis category are defined by the geographic area with the potential to be affected by a proposed project for each impact category. Study areas, therefore, differ depending on the technical area being analyzed. While any given technical analysis would define a specific study area, the general study area is about 0.25 mile beyond the Project Area. The eastern limit of the study area is Sixth Avenue between West 30th Street and West 48th Street, which encompasses the area requested to be included.

Comment Group 89 Phase 1 of the Project will necessitate closures of roadways and re-routing of buses for extended periods of time. Multiple roadways and sidewalks would have lane closures or be

closed entirely or would have certain turns or use restrictions for the duration of Phase 2, resulting in minimum delays of six to 15 minutes on multiple streets. The impact of traffic delays on air quality and MTA bus schedules are not studied. The congestion which the nighttime closure of Lincoln Tunnel will create in other parts of the district has not been studied. The construction during the Project will be extremely challenging for the surrounding residential and business community: ten years with proposed both daily and nightly construction noise, bus traffic on surface streets, and additional congestion. (15) CHDC requests that more detailed analysis of construction impacts during Phase 2 (2028 – 2032) be disclosed to ensure that: Noise and air quality impacts do not significantly impact the quality of life of our residents, and particularly the elderly who are at home all day or use the rear courtyard for fresh air. [Confirm that] Excavation, drilling, and construction vibrations do not cause damage to the foundation, walls or structure of CHDC's 170-year-old buildings. [During Phase 2 construction] (23)

Response DEIS Chapter 14, "Construction" (see FEIS **Appendix A**) detailed changes to traffic conditions as a result of the construction of the Proposed Project. This includes changes to general traffic, effects on mass transit like local city bus service, as well as resultant air quality impacts. Analysis of air quality and vibratory conditions during construction concluded that there would not be air quality impacts as a result of the Proposed Project, under both NEPA and CEQR guidelines. The analysis of noise did conclude that there would be construction activities generating noise that would exceed federal guidelines, and proposed mitigation measures to lower the decibel level of noise reaching affected properties were included in the evaluation. The FEIS updates the construction analyses in **Appendix B.7 "Construction."**

As detailed in **Appendix B.2.2**, the Programmatic Agreement establishes the process to develop a CPP for historic buildings within 90' of construction activities to reduce the likelihood of any inadvertent damage. The details will be developed as contractors are selected and plans reviewed by a project engineer and Concurring Parties (identified through the Section 106 process) and would include vibration and seismic monitoring as appropriate. .

Comment Group 90 Please describe the measures to ensure the effective management of water pollution issues that may arise during construction. Please describe the means and methods of the containment plans regarding the risk of groundwater contamination during construction. Please describe how the PANYNJ reviewed the impact construction will have on the domestic water, sanitary and stormwater systems. Please confirm how PANYNJ plan to mitigate these risks. (23) How will interruptions to utilities during construction be mitigated? Will PANYNJ review the impact construction will have to the domestic water, sanitary and stormwater systems? Please confirm how PANYNJ plans to mitigate these risks. (32)

Response The process to address any contaminated soil or groundwater encountered during the construction of the Replacement Facility will largely depend on the specifics of the site and type of contamination, determined through sampling programs. Site specific plans, in compliance with local, state and federal requirements will be developed for managing any contamination identified and will specify the need for any engineering controls (such as vapor barrier systems) that should be incorporated into the plan. Details were included in DEIS Chapter 8, "Hazardous Materials" (see FEIS **Appendix A**) and are updated in **Appendix B.7 "Construction,"** of the FEIS.

The EIS did not determine that construction of the Proposed Project would result in any impacts to water or sewer systems. For any work involving construction activities within close proximity to utilities, additional precautions are required by the City or Private utility companies to reduce the likelihood of inadvertent damage to these systems. The PANYNJ will seek to minimize any disruptions

or interruptions to utility service to adjacent properties throughout the construction process. Where a planned service interruption is unavoidable, notifications will be made to effected properties (including the use of flyers, social media, temporary signage and email bulletins) by the project's construction liaisons informing residents or property owners / managers of the interruption and any alternate provisions that would be provided or recommended.

Comment Group 91 We also ask the Port Authority to mitigate the noise from construction, particularly for surrounding residents, to keep local stakeholders up to date on construction phasing at regular intervals, and to present plans for best practices for reducing noise during construction to Community Board 4. (4) There are exceedances of noise throughout the project area during construction. EPA suggests that a Noise Monitoring Plan be developed in the vicinity of the area to ensure that additional mitigation can be considered and implemented during construction. (5) The exiting bus ramp demolition will be accomplished using hoe ramming, i.e. a hydraulic hammer mounted on an excavator arm. This method is a very noisy process; published data and OAA measurements document hoe-ramming sound levels of 90 dB(A) at 50 feet. Noting that certain CHDC properties are less than 1 foot from portions of the bus ramps, it is reasonable to conclude that hoe ramming sound levels could range from 95 dB(A) to as high as 110 dB(A) outside CHDC property windows. Such sound levels will likely be typical for months. Assuming closed windows attenuate about 20-30 dB(A) of sound, please describe how the Port Authority intends to address worst-case interior sound levels of 80-to-90 dB(A) and months-long interior sound levels of 65-to-75 dB(A). Such sound levels will not permit conversation, work, recreation, or sleep. Please describe how the Port Authority intends to relocate the residential and commercial CHDC occupants from the affected buildings during the periods incorporating hoe ramming north of 40th Street. The existing highest Ldn sound level at Location 8 is noted to be 76 dB(A). Please confirm the 1-hour sound levels throughout a typical day and night at this location. This information is necessary to understand the acoustical environment in this location. The EIS notes that the 8-hour daytime Leq sound level from construction will range from 76-to[1]78 dB(A) at CHDC locations, while the 8-hour nighttime Leq sound level from construction will range from 68-to-71 dB(A) at the same locations. Evaluating the 8-hour average sound level does not accurately characterize the sounds of short-duration and high-amplitude events such as drilling and hoe ramming. Please confirm the anticipated hourly L10, L1, and Lmax sound levels from construction at these locations. Please confirm the existing hourly L10, L1, and Lmax sound levels at these locations. (23) Will there be any breaks in construction periods so that Metro (and other religious facilities in the affected areas) can have uninterrupted services during our regularly scheduled service times, Sunday's at 11:00 am? (32) Manage the construction noise, especially at night. (69) The constant drilling and construction coming from that site is unbearable! This community doesn't need any extra noise or people at all. (73) The constant drilling and construction coming from that site is unbearable! This community doesn't need any extra noise or people at all. (109)

Response Construction in each work area would occur over limited periods and resulting noise impacts would therefore be considered temporary and transient. Construction of the Proposed Project would be anticipated to adhere to the requirements of the New York City Noise Control Code for construction noise control measures.

The PANYNJ has identified mitigation specifically to address construction noise, described in **Appendix B.7 "Construction"** and is actively working to incorporate best practices for further noise reduction including identifying specific equipment such as sound barriers, or noise muffling tents and blankets. The PANYNJ will continue to formulate and implement plans to limit the amount of noise generated during construction, and once procured, collaborate with specific contractors. As

construction specifics advance, the PANYNJ will continue a robust public engagement process with residents, businesses and travelers in the area.

The FTA Guidance Manual specifies impact thresholds applicable to construction during daytime hours, nighttime hours, and the 30-day average. Impact thresholds establish a level of noise, over a specified period of time, that is acceptable for daytime and nighttime conditions. If the level of noise (measured in decibels) is exceeded, analysis should determine that activities will result in an impact. The construction noise impact criteria from the New York City CEQR Technical Manual were also considered in the identification of adverse noise impacts. These criteria for adverse impacts are well suited for evaluation of effects in New York City. Cumulative noise analyses were performed to determine maximum $Leq(1)$ noise levels that would be expected at each of the 129 noise receptor locations during each of the selected construction noise analysis periods. At most receptors, noise levels resulting from construction of the Proposed Project were predicted not to exceed the applicable construction noise criteria specified in the DTA Guidance Manual at any point during the construction period. However, construction of the Proposed Project is predicted to result in elevated noise levels at several of the analyzed receptors. Such noise level increases would only occur on a portion of each building for a limited duration of time, and would result in maximum interior noise levels in the mid-40s to mid-50s dBA.

The PANYNJ plans to conduct noise monitoring during construction, and further develop a noise mitigation plan, as contractors are procured.

Comment Group 92 EPA recommends that FTA and the project sponsor commit to air monitoring related to construction, including dust and lead, in the vicinity of the project. The construction chapter should discuss what would be monitored for and what mitigation would be initiated if necessary. (5) The City would like more detail on the construction phasing of the Dyer Deckover particularly with regard to Phase 3 of construction. (11) What will be the plan to control and contain construction debris and mitigate air pollution? Traffic delays resultant from the project, especially during construction will translate into engine idling with further negative impacts on air quality. Please analyze those impacts and provide quantitative results. Similarly, concrete delivery trucks will also queue and idle, further affecting air quality. Please analyze those impacts and quantify results. idling for hours will affect air quality, which has not been quantified or mitigated. (15) Please describe how PANYNJ will manage the potential impacts to air quality in apartments located 6 inches, 15 feet, or 20 feet from construction, including dust and fine particulate matter. Please clarify what methods will be implemented to ensure air quality is safe during and after construction for residents, commercial tenants, and pedestrians. CHDC requests air quality testing analysis of construction equipment/activity on residents of 401-405 West 40th Street and 541-547 9th Avenue and of conditions after the project is complete. (23)

Response **Section 14.A.5.2.1 “Emission Control Measures”** of the Construction Appendix of the DEIS details how the PANYNJ will minimize emissions from the construction of the Replacement Facility. The type of emissions of most concern for properties in close proximity to the construction area would be classified as “fugitive emission sources” and result primarily from the demolition of materials, most notably concrete. Demolition of other materials, such as steel, produce only nominal levels of fugitive dust. Other sources of fugitive dust would result from soil or aggregate handling or vehicles traversing unpaved areas of the work zone. The PANYNJ will require that contractors utilize dust control measures including the use of wet saws for concrete cutting, tenting of work areas or truck loads, watering to suppress dust during construction activities and on any unpaved areas of the work zone, and truck washing for vehicles departing the site.

Air, noise and vibration monitoring will be performed for the duration of the construction of the Project. Should levels of emissions, decibels or vibrations unexpectedly exceed thresholds, the PANYNJ will alert the contractor and take measures to reduce any exceedances, as feasible.

A dust control plan, including a watering program, would be required for activities known to generate fugitive dust (including demolition, vehicle circulation on unpaved surfaces and truck washing). A site-specific Construction Health and Safety Plan (CHASP) will specify testing, monitoring, and detail measures to be implemented (including notification of regulatory agencies, dust suppression techniques, community air monitoring, and appropriate air monitoring action levels and responses) if soil and groundwater contamination or other unforeseen environmental conditions are encountered. The CHASP would also define procedures to minimize dust generation during soil disturbance and excavation activities, such as dust and air monitoring of the work area, the use of water spray and dust retardants, securing tie-downs for vehicles transportation soil, and truck wheel washing. Measures would be taken to reduce pollutant emissions during construction of the Proposed Project in accordance with all applicable laws, regulations, and building codes. These include the use of ULSD, dust suppression measures, idling restrictions, and diesel equipment reduction. In addition, construction of the Proposed Project would use best available tailpipe reduction technologies to reduce air pollutant emissions.

Air quality impacts resulting from changes to traffic patterns and construction activities were analyzed in the DEIS Chapter 14, "Construction," and determined that the construction of the Proposed Project would not result in adverse impacts to air quality. Specific assumptions about construction vehicle idling, the use of diesel equipment, tailpipe emission reduction requirements and the use of ULSD fuels were detailed and quantified in Section 14A.5.2 of the Construction Appendix of the DEIS. Please see FEIS **Appendix A** for the cited DEIS content.

Comment Group 93 With the new, lowered, annual NAAQS of $9 \mu\text{g}/\text{m}^3$ $\text{PM}_{2.5}$ in mind, there are values reported in Chapter 14 (Construction) that are now above this standard. While this new NAAQS will have to be met moving forward, EPA has not yet completed the formal designation process for identifying nonattainment areas under the new standard. Therefore, EPA has analyzed this DEIS for compliance with CAA conformity requirements with respect to the particulate matter standard(s) for which the area is currently in a maintenance status (the 1997 and 2006 $\text{PM}_{2.5}$ NAAQS). However, because of the lowered standard for $\text{PM}_{2.5}$ and knowing the elevated levels of $\text{PM}_{2.5}$ expected to be seen as a result of construction, EPA recommends that additional air quality mitigation efforts be pursued to further combat any adverse air quality impacts and to help meet the new standard in the future. The construction chapter states that "If construction emissions are below the NAAQS, no further assessment of the magnitude and duration of impacts is warranted." EPA reiterates that compliance with the NAAQS does not equate to there being no impacts. The increase in NO_2 is nearly double the background concentration. EPA strongly recommends a more robust discussion on the impacts of these increases, especially with respect to vulnerable populations. (5)

Response The change to the annual $\text{PM}_{2.5}$ NAAQS occurred after the publication of the NOI for the project. Due to this timing the project based the analysis on the annual $\text{PM}_{2.5}$ NAAQS of $12 \mu\text{g}/\text{m}^3$. As described in section 14.3.6, Construction Transportation – Mitigation," of the DEIS (see FEIS **Appendix A**) the PANYNJ will implement feasible construction traffic mitigation measures during project construction phases and undertake a series of best-practice operations to manage traffic circulation during construction. Compliance with the NAAQS was used to show that estimated impacts would be better than the health-based NAAQS standards. It is understood that compliance with the NAAQS does not mean there will be no changes in ambient pollutant concentration in the local area. The NAAQS are health-based and EPA has determined them to be protective of sensitive

populations. Therefore, impacts below the NAAQS or CEQR de minimis criteria, suggests vulnerable populations are protected.

A set of extensive efforts to avoid, minimize or mitigate effects resulting from construction activities is detailed in FEIS **Appendix B.8 “Mitigation.”** These measures include requirements for construction equipment and methods to reduce noise, fugitive dust and emissions, monitoring environmental conditions and a management plan to respond to real-time conditions and would benefit the environmental justice populations (and the general public alike) working or living in the vicinity of the Project Site.

Comment Group 94 Table 14-4 and 14-5 show changes in travel time and the conclusion states that traffic is impacted at several intersections but it’s not clear the level of impact being determined. EPA suggests further description of the type and degree of these impacts. (5)

Response Thank you for your comment. These traffic conditions were evaluated based on coordination with NYC DOT. They represent temporary conditions during portions of the construction phases and potential mitigations were developed and will continue to be advanced through the Traffic Management Plan.

Comment Group 95 Page 14-11 states the number of additional vehicles generated by construction did not result in significant impacts during phase 1. EPA recommends the DEIS define significant impacts at the beginning of the chapter instead of a table footnote. (5)

Response Comment noted.

Comment Group 96 Please confirm the location and duration of street closures in the vicinity of construction. Please clarify the strategies to redirect and reduce traffic flow to compensate for the increased construction traffic. (23)

Response These details were provided in Chapter 14 and Appendix 14A of the DEIS. Please refer to **Appendix B.7 “Construction”** of the FEIS for the latest analysis and details.

Comment Group 97 Construction of the new ramps to the Lincoln Tunnel, storage and staging facility (interim bus terminal), and new permanent terminal, over an eight-year period, will disrupt the operations of six MTA/NYCT bus routes (particularly the M42), and the travels of 7,400 passengers who board or alight in the project area on a typical weekday. Bus priority treatments, barriers and signage will be necessary to maintain bus operations and ensure our customers safety. (12)

Response The PANYNJ will be working closely with MTA, NYCT and NYC DOT as construction logistics plans are further developed. The PANYNJ has managed some of the region’s most complicated public projects, including the WTC, LaGuardia and JFK airports and is aware of the importance of early planning and on-going communication with the community and stakeholders. We have developed detailed logistics plans for how the construction of the Replacement Facility (ramps, SSF and new Main Terminal) can be constructed safely and efficiently with minimal disruptions.

The PANYNJ is developing several measures to allow MTA/NYCT bus routes to continue safe and effective operations during construction; these measures include:

- Relocating existing bus stops to accommodate construction activities, pedestrian circulation and other transit connections;
- Addition of temporary bus stops to provide better access to interim terminal and reduce pedestrian congestion; and
- Modifications to bus stop locations / geometry to provide sufficient queuing areas and improve bus operations.

The proposed modifications to bus stops anticipates a collaborative process between NYC DOT, NYCT and the PANYNJ.

Comment Group 98 We also echo the board's concerns regarding traffic impacts during construction when roadways and the Lincoln Tunnel are fully or partially closed. We encourage clear communication during construction between the Port Authority, bus operators, and commuters, to ensure clarity on bus boarding locations, timings, and any potential delays. We appreciate the separation of construction into two phases for the storage and staging facility to be completed first, to then be used as an interim bus terminal while the new main terminal is being constructed. We ask for clear plans for the management of bus and pedestrian circulation during construction to minimize congestion and ensure pedestrian safety, with impacts to the local area considered in the Transportation Management Plan. (4) EPA suggests that the comprehensive Traffic Management Plan be discussed with the nearby community before finalizing. The construction phase will impact the neighborhood and it is important to solicit input from the nearby residents as to the traffic impacts and mitigations. (5) Please describe the mechanism for ongoing consultation and feedback from surrounding commercial tenants during construction. Please describe the mechanism for ongoing consultation and feedback from surrounding residents during construction. Please confirm how PANYNJ commits to addressing this feedback at each stage of construction. Please confirm the process by which impacts are communicated in advance. (23) The planned Transportation Management Plan should include recurring meetings with local organizations, including the Hudson Yards Hell's Kitchen Alliance, to provide regular updates on construction and be a place to receive complaints and questions as they are happening. An email address to send questions to is not enough, a meeting with a dedicated team of people needs to be set up as part of the Transportation Management Plan. (27) Every single person I try to talk to about this construction tells me they don't know anything about it because it has all been kept hushed up. The public deserves & demands answers before you start demolishing midtown. I don't think it's oversight; you are intentionally obscuring your plans because you know the masses would protest if they knew what you are up to. Shame on you all. (104)

Response The PANYNJ will engage in robust outreach and engagement before and during construction activities, working closely with appropriate city and state entities and the local community.

The PANYNJ will establish a coordinated process for disseminating information regarding construction activities to a variety of stakeholders (including commercial tenants, residents, travelers, motorists and bus operators) as well as receiving feedback on previous, current or planned activities. This engagement will be conducted across a variety of platforms including A.) having construction liaisons on the ground meeting with local businesses, bus terminal users, and residents directly; B.) on-line via social media (PABT@X.com; PABT@instagram.com; PABT@facebook.com) or

the project website <https://www.panynj.gov/bus-terminals/en/port-authority/planning-level-scoping-process-pabt.html>. As details of construction are determined to require engagement with specific property owners, businesses or residents, the PANYNJ will engage directly with those stakeholders at the level of detail required by the issue.

Comment Group 99 The City would like to update construction transportation analysis to include more detail on the impacts to pedestrians from sidewalk closures. (11) Please describe how pedestrians will understand how to access businesses during sidewalk closure or detours, including any signage or other measures. Please describe how pedestrians will be protected and made to feel safe while shopping during construction. (23)

Response The PANYNJ has appreciated the collaboration with the City of New York as design and construction planning for the Replacement Facility has advanced. The PANYNJ has coordinated with the City, specifically NYC DOT, regarding pedestrian conditions during construction. Please see FEIS **Appendix B.7 “Construction”** for updated pedestrian analysis reflecting the most current construction logistics. Access to buildings adjacent to construction activities (including residential, office or retail) will be maintained. Safe access will be provided through the use of temporary walking surfaces or decking over excavation or sidewalk replacement, including connections to building entrances. Signage will be provided identifying the location of building access, as well as the location of hydrants or building standpipes for first responders. The PANYNJ is developing specific designs for overhead protection (i.e. scaffolding) and will provide details for the design / appearance of the overhead protection, lighting around the site and general security and safety measures.

Comment Group 100 Study limiting commercial traffic on W 36th Street during construction phase of project. (116)

Response Comment noted.

Comment Group 101 Although there are sufficient parking spaces available for construction workers coming to the site during phase 1 and 2, the DEIS should indicate if the spaces taken up by construction workers would result in limiting spaces available for residents or commuters traveling to the area for work and/or medical purposes. The document should clarify if this calculation includes an analysis of parking spaces in the area already in use by normal visitors/residents in the area. (pg. 14-17) (5)

Response Between the DEIS and publication of the FEIS parking data, including occupancy rates, were updated. The survey of current utilization of private parking garages found that the utilization rate had declined (meaning more spaces are unused or available) when compared to conditions assessed in 2018. The results can be found in FEIS **Appendix B.4.4 “Parking”**.

Comment Group 102 A parking impact mitigation plan must be developed. Will the project establish contracts with local parking lots and garages to ensure there is no illegal parking on sidewalks and bus stops? The parking impact was not studied because, as stated on page 17 of Chapter 14, “Construction workers arriving at the Project Area via personal vehicle would be expected to utilize one of the many nearby parking garages.” This assumption does not match our experience with Hudson Yards and other large projects in our district. Construction workers park on sidewalks, in bus stops and other illegal parking spaces. In this district, there is no spare capacity for such spaces. (15)

Response Thank you for your comment. The PANYNJ will not permit the parking of any personal vehicles within construction areas or adjacent areas within PANYNJ’s jurisdiction.

Comment Group 103 Eighth and Ninth Avenues are major cycling and delivery corridors. However, there is no analysis of the impact on bicycle lanes and how that infrastructure will be protected from construction. (15)

Response As is typical with New York City construction, some lanes immediately adjacent to the construction site may need to be closed or narrowed for varying periods of time during the construction period. MPT plans will be developed for any required temporary sidewalk or lane narrowing or closure to protect the safety of the construction workers and the public. Approval of these plans and implementation of the closures will be coordinated with NYC DOT.

Comment Group 104 Develop a relocation plan as needed for long-term residents, not-for-profits, daycare facilities and businesses that will not be able to operate due to adjacency to construction noise and activity. Develop a compensation plan as needed for local businesses immediately adjacent to construction (Sea breeze, International, Pizza place, et al.). (15) A New York State parole board is located on West 40th Street just west of Eighth Avenue. This facility processes 2,000 parolees per day. This is a vital service for the New York State Department of Corrections and must not be disrupted. (15) Clear ADA access and signage is maintained at all times for our residential and small businesses--business entrances. We're particularly concerned about the economic impacts of long-term construction given the number of businesses that close [d] permanently uptown during the Second Avenue Subway construction. (25) Our biggest concern is when the demolition starts in 2028. Need a better understanding of how the businesses on 40th Street between 8th & 9th Avenues will be directly affected by demolition and then eventually construction. What is being done to minimize the disruption to all the hotels on 40th Street. Our concern is that this project will drive business away for the duration of the construction. (44) We have a commercial space currently vacant. It's going to be very difficult to fill because we can't present an office space that's going to be in the middle of jackhammer city. So that is a big problem, and I am concerned to whether any of these plans have mitigation factors for the people in the immediate environs who are going to be so adversely affected by them. (61) The disruption will have an adverse economic impact on property owners in the area. Commercial and residential space will be difficult to fill. We currently have a vacant office space, and it is hard to make it appealing to a tenant considering the 8 years of major demolition and construction taking place only yards away. (109)

Response The PANYNJ will require all contractors and construction activity to maintain safe and ADA compliant access to properties proximate to construction work areas. In areas where overhead protection (i.e., scaffolding or sidewalk bridges) is anticipated to be installed, arrangements for retail signage to be installed can be developed to allow businesses to have a more visible presence. Please see **Appendix B.7 "Construction"** for details on the operation of West 40th Street between Eighth and Ninth Avenues during Phase 2 of construction. The PANYNJ has provided updated details showing proposed modifications to the street providing additional space for pedestrians, and adjustable vehicular travel lanes that provide a lane for through traffic, and curbside vehicle access on the southside of the street during non-peak periods.

The PANYNJ does not anticipate any businesses being unable to operate or requiring relocation.

Comment noted. The PANYNJ will work to maintain access to all surrounding properties, including businesses, government facilities and non-profit organizations during construction of the Replacement Facility.

Comment Group 105 It is our understanding from communications with the Port Authority that: All retail and residential deliveries and trash services will be done from internal loading docks instead of the sidewalk. Will that be the case for the existing businesses located on Ninth Avenue between

West 40th and West 41st Streets? Curb cuts planned on the north side of West 39th Street (Tenth Avenue - Eleventh Avenue) will be limited to 40ft wide to be used on an exceptional basis. (15) Please describe how pedestrians will be protected and made to feel safe while exiting and entering buildings during construction. Please describe how construction will impact deliveries to commercial tenants and how PANYNJ will ensure that no significant adverse impacts will occur. Please describe how additional advertisement and signage will be provided when commercial spaces become covered with sidewalk sheds and other protection measures. (23) How will trash pickup for those commercial and residential buildings on West 41st Street operate during Phase 2 of the project (and beyond)? (27) Can the final design include a designated loading zone or permitted on or off-street loading areas and/or designated loading times, to receive deliveries essential to the programs and operation of the building? For years, our service programs have been impeded by the inability to load and unload deliveries at the curbside in front of the building due to bus traffic and DOT traffic regulations related to the Lincoln Tunnel and PABT. (32)

Response PANYNJ will ensure regular communications and coordination continues throughout construction of the Proposed Project with residential, business. The DEIS is intended as a regulatory document to disclose potential environmental impacts resulting from the Proposed Project. It does not describe all technical design elements as they remain under development.

Comment Group 106 EPA recommends the DEIS include additional detail regarding the mitigation measures for construction impacts related to EJ communities. (5) Please describe how construction impacts were assessed on environmental justice populations in CHDC's low-income housing located 6 inches, 15 feet, or 20 feet from the proposed project, particularly excavation noise and night-time construction which may displace residents of 401-405 West 40th Street and 541-547 9th Avenue. Please describe in detail how construction impacts on and the potential displacement of small businesses that serve environmental justice populations are not disproportionately borne by these populations, as defined in the FTA Circular, based on the USDOT Order. (23)

Response Please see additional evaluation of construction mitigation measures, specifically to address issues of environmental justice, in **Appendix B.12 "Environmental Justice."** The appendix provides additional details on existing health and pollution burdens, specific outreach commitments, and details on use of environmental monitoring (air quality, noise, vibrations) required during construction. The appendix additionally provides mitigation measures, and efforts to avoid or minimize adverse effects reviewed specifically for the effect on environmental justice populations, including details on the use of Community Air Monitoring Program (CAMP), provision of a hotline for issues during construction, (to be administered through the Construction Logistics Center and the PANYNJ Government and Community Affairs Office) and adaptive management plans for responding to real-time on-site conditions. As described in Appendix 4A, Socioeconomic Conditions, of the DEIS (Appendix A of the FEIS), the Proposed Project would not result in indirect business displacement, direct or indirect residential displacement, or adverse effects to specific industries. PANYNJ would coordinate with businesses within the existing PABT in an attempt to minimize potential effects on existing businesses, and some of these businesses may be relocated to the SSF during construction and then relocated back to the new Main Terminal following its completion.

Comment Group 107 Please describe the means and methods of soil testing and abatement strategies for the risks of uncovering soil contaminations during excavation. Please describe the testing and abatement strategies for the potential uncovering of ACM and LBP during the demolition of adjacent structures. Please describe the strategies to be used to prevent contaminant materials and liquids from damaging the property structure, internal infrastructure, and landscaping. (23) We live in a building directly above the parking deck of the PABT and are very concerned about this

project's impact, especially the demolition. a) Is there asbestos (or other hazardous materials) in the current bus terminal (including the parking decks and tunnel ventilation areas)? b) If yes, what measures will be taken to ensure that they are not released into the air when the structure is dismantled? c) Will the structure be imploded or taken down some other way? d) Will the terminal be dismantled first, then rebuilt, before the parking decks are dismantled? Or will they both be dismantled simultaneously? e) What year do you expect this to happen? (79) So our apartment overlooks the parking deck of the Port Authority Bus Terminal, and we're very concerned about the impact of the demolition and the rebuilding. Is there asbestos or other hazardous substances at the terminal currently? And if yes, what are the measures that will be taken to ensure that they will not contaminate the surrounding areas? (80)

Response PANYNJ has conducted a Phase II Environmental Site Investigation and soil samples were analyzed for various substances, including VOCs, SVOCs, PCBs, pesticides, TAL metals, TPH—including GRO and DRO—and TCLP RCRA 8 metals. Soil results were compared to the SCOs established by NYSDEC and the RCRA Hazardous Waste Levels for Toxicity. A Soils and Contaminated Materials Management Plan would present measures for managing contaminated soil and groundwater in accordance with applicable Federal, State, and local regulations. The plans would incorporate safety and other measures to minimize the potential for impacts to the community and construction workers. A comprehensive asbestos survey of areas to be disturbed (including underground utility vaults) would be conducted and would include sampling the suspect materials to confirm the presence or absence of asbestos. The identified ACM would be removed and disposed of before construction in accordance with all federal, state, and local regulations. Asbestos abatement procedures and containment requirements would be based on the type and quantities of ACM to be removed.

The existing PABT would be demolished through a process referred to as “deconstruction” which begins with removal of any identified hazardous materials. The terminal would be isolated from utility connections (water, electric, gas, etc.) and any equipment / machinery / building utilities fixtures and furnishings not already removed would be salvaged. Once cleared, demolition would proceed remove interior walls (non-structural) and then exterior walls. Structural steel and concrete would be removed working from the top of the building down. The parking facility at the existing terminal is anticipated to be closed before demolition begins. The Replacement Facility does not include a replacement of a parking facility.

Comment Group 108 What will become of the vulnerable communities dependent on services from Metro Baptist & The Dwelling Place during construction & beyond? I think project managers & their families should have to live on site for the duration of construction as that is the only way they will ever be conscientious to local residents. (104)

Response Access to all buildings, businesses and service providers located in the area of construction activities will be accessible and able to operate.

Comment Group 109 The DEIS acknowledges that there are also potential significant adverse impacts on historic resources within the Paddy's Market Historic District resultant from the proposed construction. CHDC's properties at 541-547 9th Avenue and 401-405 West 40th Street are contributing resources to the Historic District. CHDC's 170-year-old tenement buildings are at extreme risk due to their immediate adjacency to the current 9th Avenue ramps and future Main Terminal. The buildings are within 6 inches, 15 feet, or 20 feet of the current ramp structure. The DEIS mentions that a CPP will be devised; currently, without a construction plan in place, it is impossible for us to evaluate any significant impacts in the absence of more detailed information. The

DEIS also includes a draft Programmatic Agreement that outlines commitments that the Port Authority must make to protect historic resources, but there is no mention of consulting any property owners whose historic buildings will be impacted by construction. (23) The DEIS acknowledges that there are also adverse impacts on historic resources within the Patty's [sic] Market historic district of which we are a contributing resource. Our old law tenement buildings are at extreme risk due to the proposed project because our buildings were constructed on rubble foundations, and there's also an underground stream that traverses the lot. And could cause extensive damage to existing buildings when adjacent lots are excavated. The DEIS mentions the CPP will be devised. Again, however, we're not able to evaluate potential adverse impacts in the absence of more information. (25)

Response A CPP will detail additional and specific measures being implemented to ensure that historic properties are not inadvertently damaged during construction. The CPP will contain specific details of the existing conditions of historic properties, the specific construction activities that will occur within 90 feet or less of the historic property and specific protective actions that will be undertaken to reduce the likelihood of damage. Further specifics will be provided as CPP's are developed and shared with property owners and the Consulting Parties. The Final Programmatic Agreement, outlining FTA and PANYNJ commitments for mitigation, and development of a CPP is in FEIS **Appendix B.2.2**.

Comment Group 110 We ask the Port Authority to explore any other mitigations that could be done to improve the area during construction, such as planting street trees on portions of Port Authority property not impacted by construction and coordinating trash pickup in areas that will be periodically affected by construction. (4) Ninth Avenue sidewalks should be enlarged as is planned in the DOT SIP. Most of the intersections on Eighth Avenue should be equipped with Barnes' dances. (15) REBNY emphasizes the importance of incorporating construction mitigation measures to minimize disruptions to the surrounding community. (20) Please describe what specific measures the PANYNJ will implement to protect the historical character or neighboring buildings during construction and after completion. Please provide the protocols if historical features of neighboring buildings become damaged due to construction of this project. The new terminal would extend west of Ninth Avenue between West 40th and West 41st Street immediately adjacent to and north of Clinton Housing's buildings on this block consisting of 401 – 405 West 40th Street and 541 – 547 Ninth Avenue. These buildings are 4 and 5 story brick tenements of masonry construction with wood joist floors and masonry rubble foundations built between 1854 and 1868. They were gut-renovated in 1996 with a combination of public and private financing, including investment through the Federal Low-Income Housing Tax Credit program. The development is currently being refinanced through New York City's Department of Housing Preservation and Development Year 15 Program. Those buildings will receive major capital improvements focusing on energy efficiency including full building electrification of heating, hot water, and cooling systems, all new windows, and masonry repairs. As part of the mitigation, PANYNJ has proposed installing new windows; CHDC is already taking that action but may need to upgrade the acoustic rating of those windows and will look to the PANYNJ to fund that cost differential. There are risks during excavation of uncovering soil contaminations. Please describe the means and methods to prevent any and all contaminant materials and liquids avoid contamination from run off into stormwater and sewerage systems. Please describe the protective measures that will be in place to prevent damage to the CHDC property during the construction of the SSF, the demolition of the existing ramp structures, the construction of the new terminal west of Ninth Avenue and any other construction operations close enough to impact these buildings. Please confirm what assistance will be offered to owners and residents of adjoining and surrounding properties to help minimize the difficulties caused by construction. Please describe when and if any temporary accommodation or relocation will be available for residents in alternate locations during the most disruptive construction phases or if required by the NYC

Appendix C. Summary of Comments and Responses

Department of Building for public safety purposes. Please describe when and if any compensation will be provided to residents of CHDC during exceptionally noisy periods of construction, such as ramp pillar demolition. (23) How will residents and staff of Metro/RMM be compensated for living directly adjacent to major construction? A monitoring plan of our building based on the requirements of TPPN 10/88 should be developed. This would include vibration and optical monitoring and the possible installation of crack gages at existing cracks in the building elements. The western side of our property is within 90 feet of the SSF so monitoring would be required starting with Phase 1. (32) Mitigate neighborhood traffic, air pollution, and noise during construction process. Significant traffic delays that will adversely impact congestion, air-quality, noise (excessive honking), and emergency vehicle response times on neighborhood streets. (116)

Response The PANYNJ will procure services to clean the construction site to maintain hygienic and safe conditions. Cleaning services would include rodent abatement, removal of debris, litter or material from areas within and adjacent to the work zones, and regular watering for dust suppression.

The PANYNJ will closely monitor construction noise levels and work to minimize sound levels to the extent feasible and practicable. Contractors will be directed to implement noise muffling / obstructing methods including tenting, noise muffling blankets and acoustical barriers. Should noise levels approach or exceed accepted thresholds, the Construction Logistics Center (CLC) would take action to address and correct. Should noise levels prove unable to be sufficiently reduced the PANYNJ would identify impacted nearby properties which could benefit from multiple mitigation measures, selected on a case-by-case basis.

Air, noise and vibration monitoring will be performed for the duration of the construction of the Project.

The PANYNJ is not considering any programs to compensate residents or businesses unless directly affected (i.e. – damage, inability to operate) by construction.

Comment Group 111 Install sound cameras along W 36th Street between 8th & 9th Avenues and between 9th Ave & Dyer Avenues. (116)

Response The PANYNJ will review and consider equipment or techniques that may reduce the amount of noise generated by activities under its control, within its jurisdiction.

Comment Group 112 Coordinate with the Gateway project which will close Tenth Avenue at West 30th Street and possibly will need access to the Lincoln Tunnel overnight for trucks and debris. (15) Bella Abzug Park, Block 6, (West 39th Street midblock between 10th and 11th Avenue), which is directly south of the new ramp structure over Galvin Plaza, will be constructed within the same time frame as the ramp structure (roughly 2026-2028). Construction will affect use of West 39th street, so coordination with NYC EDC, the entity in charge of park construction, will be essential. Bella Abzug Park (Block 6), which is directly south of the new ramp structure over Galvin Plaza, will be constructed within the same time frame as the ramp structure (roughly 2026-2028). Since construction will affect use of 39th Street, coordination with NYC EDC will be essential. (27)

Response The PANYNJ collaborates closely with the Gateway project and will continue to share information and coordinate on construction activities. The PANYNJ will coordinate with any construction (active or planned) as needed and appropriate, in collaboration with NYC DOT.

Comment Group 113 CHDC requests that our organization be formally recognized as a consulting party in the programmatic agreement, and also be included as a formal consulting partner for the upcoming CPP, as well as any potential emergency situations that arise near our buildings during the construction time period. (25)

Response CHDC has been added as a Consulting Party during the Section 106 process and, as a signatory to the Programmatic Agreement, is now a Concurring Party.

Comment Group 114 Page 14-14 covers additional trips generated by the project and the thresholds for additional analysis. To clarify why an additional analysis was not performed, EPA suggests the main document add the section from the appendix: "Because the subway trips generated by construction workers are distributed among multiple lines and station elements and occur outside of general peak hours, no further analysis was conducted for construction trips on transit facilities." (5)

Response Thank you for the suggestion, The suggested language is incorporated in **Appendix B.7 "Construction"** of this FEIS.

Comment Group 115 The mitigation chapter states that "construction would typically occur during weekday daytime hours with intermittent nighttime work over the course of approximately one year, limiting the noise produced during nighttime hours when residents would be most sensitive to noise." The construction chapter assumes 8 hour shifts that last until 11pm and one overnight shift per week. The DEIS should clarify the proposed schedule and determine if further mitigation should be considered for this overnight work that could potentially have adverse impacts. (5) The construction schedule calls for five workdays per week, with two eight-hour shifts (7 a.m. – 3 p.m. and 3 p.m. — 11 p.m.) and one eight-hour overnight shift. The noise will exceed the maximum permitted. Please study other proposed construction schedules to mitigate the impact on the surrounding residential and commercial community. (15) Please provide the as built construction documents of the ramp and their foundations. (23) Whether the structure will be imploded, or will it be dismantled in some other way? Will the main terminal be dismantled and rebuilt first, and then they phase it out, and then only dismantle the parking decks later, or will both the terminal building and the parking decks be dismantled simultaneously? So that is part of my concern from an environmental sort of hazard standpoint. (80)

Response The PANYNJ has developed a construction schedule that seeks to minimize disruptions to both area residents and businesses as well as general traffic. Nighttime construction is assumed only when the activities are likely to require the closure of major roadways / thoroughfares when traffic is at its lowest levels of the day. The alternative, where major streets would be closed during peak travel times, could result in more widespread negative effects (and would likely not be permitted by NYC DOT).

The EIS is a regulatory document; it does not provide as-built design drawings as part of its evaluation of construction activities.

The existing PABT would be deconstructed by first abating any hazardous materials (asbestos) and then removing elements of the building in a specific sequence (cladding, interior materials, structural members) working from the top of the building working down to the lower levels. There are no plans for the use of explosives / implosions of the building for a variety of safety and public health reasons.

Comment Group 116 Please provide clarity on what will happen on West 30th Street/Dyer Avenue (between 9th and 10th Avenues) during each phase of this project. (27)

Response Under a separate project, the PANYNJ is coordinating with the New York City Department of Transportation to reconfigure the southern terminus of Dyer Avenue at West 30th Street to create a T-intersection. During Phase 2 of the construction of the Proposed Project, the West 30th Street facility would be used for intercity bus operations, providing up to 55 peak hour bus trips. Following Phase 2 of construction the facility would not be used in association with the Proposed Project.

Comment Group 117 Where will the cement trucks be queued up. MCB4 is pleased that the Port Authority will establish a traffic management center to address the major transportation issues. (15) Please describe the staging areas that will be used during the construction of the SSF and the new bus terminal and how they would impact our access to the sidewalks on West 40th Street and Ninth Avenue. (23) What does staging along curbs adjacent to the work site mean? Will construction staging be on the sidewalks? (27)

Response Construction staging areas are defined as areas where construction equipment, vehicles and materials may be stored. Staging areas are typically within the area where the construction activities are taking place or in close proximity. Construction staging could potentially require space occupied by a sidewalk, which would require maintaining access to any building entrances that may be affected, and providing a safe alternate route for pedestrians who would otherwise be using the sidewalk.

The construction of the Replacement Facility will take place over eight years. During that time trucks making concrete deliveries will move across a variety of locations to supply the work efforts. Regular updates will be provided during the construction process.

Comment Group 118 As part of the construction of the new Terminal building, there will be a seismic gap. Please describe the means and methods for that installation to ensure weatherproofing and protection of the northern façade of 547 9th Avenue building. The DEIS report included narrative and diagrams of proposed replacement bus terminal. However, we note no construction documents were included as part of the report or its appendices. Please describe the process for the PABT seeking license agreements to access and perform construction or protection work on adjacent properties and how compensation to property owners will be provided for such licenses. Please describe the plans for pre-construction assessments of adjoining structures and how these assessments will be recorded. Please describe the measures that will be taken to ensure the structural stability of CHDC's buildings' walls. The buildings are over 170 years old, the condition of the walls vary, and the walls and their elements have needed ongoing maintenance. The buildings had exterior wall to wall floor ties installed during a renovation in 1984 and these structural elements will need to be maintained in the future. Please describe how the code required pre-construction survey of the CHDC property will be performed. Under the requirements of TPPN 10/88, a monitoring plan must be developed. This plan would include vibration and optical monitoring and the possible installation of crack gages at existing cracks in the building elements. The western side of our property is within 90 feet of the construction so monitoring would be required starting with Phase 1. Please describe the measures for the protection of adjacent roofs, windows and adjoining equipment and spaces are mandated per the building code section BC3309. These measures are indicated in the site safety plan which would need to be provided and reviewed for our acceptance. Please describe how the existing ramp structures will be demolished. Please describe Support of Excavation measures (SOE) and building protection measures that will be in place prior to their

demolition. (23) Support of excavation drawings for the new terminal are required by the NYCBC. This should include measures to maintain our buildings foundation and sub-grade in a stable condition and include details of their installation. This may include underpinning and soil bracing as required to maintain stability of our buildings. How will the PA protect and preserve the existing church structure and mitigate against further damages? What measures will be taken to ensure stability of Metro's buildings? A pre-construction survey of our property should be performed. This is a building code requirement. (32)

Response The EIS is a regulatory document; it does not provide as-built design drawings, details on waterproofing or other specific assembly or installation methods as part of its evaluation of construction activities.

The PANYNJ will take all necessary and appropriate steps required for access onto private property, including the creation of access agreements or licenses. The details of the access agreements will vary depending on the property, reason for the access and duration of needed access. Similarly, the site safety plans, and how they will protect adjacent properties will depend largely on the type of construction activity and the adjacent properties.

While PANYNJ is not directly subject to New York City or New York State building or fire codes, PANYNJ has its own set of design and construction standards, which are based on nationally recognized building codes and engineering practices. In addition, PANYNJ reviews and approves all construction plans within its jurisdiction to ensure they meet or exceed these standards, and works in close consultation with local building departments, including the New York City Department of Buildings (DOB).

Regarding protection of historic buildings within 90' of construction activities of the Proposed Project: Appendix B.2.2 "Final Programmatic Agreement" of the FEIS details a CPP that will require the PANYNJ to implement and require additional protective measures to reduce the likelihood of any inadvertent damage resulting from construction.

The demolition of ramps will take place as described in FEIS **Appendix B.7 "Construction."** Temporary ramps will be installed to maintain bus access and on-street routing (temporary detours) will be delineated and marked. Concrete would be removed with equipment including hoe rams and concrete wet saws, in accordance with required fugitive dust control measures. Hydraulic shears would be used to cut steel structural members, which would be removed through the use of excavators, skid steers or small mobile cranes.

Comment Group 119 During construction of the new PABT, the existing connections to the integrated subway complex at 42nd Street/8th Avenue & Times Square will be unavailable. Temporary vertical circulation will be required with sufficient capacity to provide access to the subway mezzanine from the west side of 8th Avenue. Port Authority staff will need to work with MTA to develop a plan for temporary access to the 8th Avenue subway mezzanine. Some customers are likely to divert to nearby stations since the temporary PABT will be located substantially west and south of the existing facility during the construction period. For example, we expect that many customers will access the 8th Avenue subway from 34th Street. The Port Authority will need to install a comprehensive program of wayfinding signs to/from the temporary PABT to guide our customers to the alternative nearby stations. (12)

Response As detailed in the DEIS Chapter 14, "Construction," the (see FEIS **Appendix A**) PANYNJ has planned for temporary subway connections during the second phase of construction (2028-2032); adjacent to the existing terminal two new temporary stairs are anticipated to be added

on the west side of Eighth Avenue connecting to the mezzanine level of the West 42nd Street – Eighth Avenue / Port Authority Station.

The PANYNJ is further developing plans to improve pedestrian access from the interim terminal (originating from west of Ninth Avenue at West 39th and West 40th Streets) by increasing dedicated pedestrian space along West 40th Street, reducing vehicle space to a single travel lane.

PANYNJ is evaluating options to widen an existing subway stair during construction to increase its capacity. The goal is to minimize the number of crossings of Eighth Avenue, which would be accomplished through a combination of improved pedestrian circulation, managed crossings, enhanced wayfinding and improving and adding temporary subway stairs.

Comment Group 120 Please describe the risks of damaging fire hydrants and fire represent infrastructure to the neighborhood surrounding the construction zone. Please confirm if PANYNJ plans to use designated fire hydrants for construction. Please confirm the plans PANYNJ must mitigate these risks. Please describe the measures that will be in place to ensure the effective management and impact of disruption of utilities and infrastructure in the surrounding area of construction. Please describe the strategies that will be used damaging the stormwater and sewerage infrastructure. Please describe any subsurface structures such as power lines, sewers, access tunnels or other services within the lot adjacent to the CHDC property that may affect the excavation at the lot next to our property. CHDC requests copies of the survey for review by our consultants and reserves the right to ask additional questions based on the findings and results of this survey. Please describe any excavation activities that will require changes of the groundwater levels in the immediate area. Such changes are known to cause settlement of nearby buildings. Please describe what hours of the day construction activities will take place and how night hours will be limited given the extremely close proximity of resident's apartments to the bus ramp structure. (23) Overnight construction work should be permitted only in consultation with area businesses, residents and Manhattan Community Board 4. There are many local organizations whose work hours are night hours, as well as residents in the area. Construction noise would be extremely disruptive. (27) I share Dominique's concerns about knowing what sort of schedule would be involved. It would be nice if there were a website for this process that let us know what kind of disruption we can expect and for how long. (61) It is imperative that this project be respectful and considerate of area residents when performing after hours and weekend construction. Port Authority has already been extremely inconsiderate by jackhammering "test pits" for the new ramps in the area of 39th & 40th streets between 9th & 11th avenues. Overnight construction permits, especially for jackhammering, should never be issued past 11:00PM. (92) My other concern is also knowing exactly where and when the construction will be occurring during the length of the project, and what will be the working hours. On the 40th Street off Ninth Avenue, will there be closings? Will the exit from the tunnel be closed and uses as a staging area for cement trucks? Initiate a website to post details about what is happening, exactly where and when, and for how long. This site could also include information about the project's overall progress. If we know what to expect, it will go a long way to easing concerns and planning movement. Install triple-paned glass windows on the buildings in the area of construction. Do not work at night between 10:00 pm and 7:00 am. Offer annual façade and window cleaning services for affected buildings. Document the existing state of neighboring buildings, as a baseline against any claims of damage resulting from the project. (109)

Response As detailed in Chapter 14," Construction" of the DEIS (see FEIS **Appendix A**) there was no determination that the construction of the Proposed Project would result in any impacts to water or sewer systems including fire hydrants. For any work involving construction activities within close proximity to utilities (including public utilities like water or sewer, or private utilities like

electric, gas, steam or data), additional precautions are required by the City or Private utility companies to reduce the likelihood of inadvertent damage to facilities. The PANYNJ and its contractors will work with the NYCDEP and NYC DOT to review interference and protection plans during construction activities that involve or are adjacent to public utilities. . Additionally, the PANYNJ will coordinate with Private Utility companies to protect their facilities during construction. Necessary modifications to private utilities may be performed by PANYNJ's contractor and compensated by the private utilities or performed by the private utility companies directly. In the event that utilities are interrupted, the PANYNJ and the responsible utilities will, when possible, notify affected customers about the outage and provide information on additional steps. Throughout construction, access will be provided to water sources (hydrants, building standpipes, etc.) required for emergency responses, in coordination with NYC DOT and the Fire Department of New York City.

PANYNJ will direct construction activities to be conducted in a manner which minimizes the risk of damage, including vibration, settlement or vehicle strikes, to proximate properties. Monitoring, including vibration or settlement detectors will be used to reduce the risk of any inadvertent property damage. Surveys conducted on private properties will be provided to property owners as appropriate.

Comment Group 121 Develop and implement a complementary public safety and social services plan to manage scaffolding and construction site conditions. Develop a pedestrian safety plan: Hire 20 pedestrian traffic managers, 24 hours a day, seven days a week, for the duration of the construction. (For at least five intersections on Ninth Avenue and five intersections on Eleventh Avenue) Consult with the community on hours and placement of personnel and devices. Consult with local schools and social service programs on pedestrian safety. Such pedestrian crossing managers will need to be deployed at high volume intersections not only to manage construction but in consultation with community need. In all cases, pedestrian crossing managers will need to be deployed, in consultation with the community, on all avenues and not just to direct construction, buses and commuter, but also to direct local traffic as well as Lincoln Tunnel traffic. (15) Please confirm that designated supervisors and security personnel will be used to support pedestrians and resident safety. Please describe how these supervisors and personnel will be implemented. Please describe the construction site protections and controls that will be used and how these will affect the residents' daily routines. Please describe the incident and the damage reporting system that will be put in place. Please describe what measures for sidewalk protection are being planned. Please confirm if overhead sheds must be placed in the property's rear yards. (23) These measures should also be coupled with pedestrian managers at high volume intersections. Pedestrian managers are a much more flexible tactic and can be coupled with other physical mitigation measures. (27) Will the final EIS include strategies to provide safe and clear access to our building throughout construction? Measures for the protection of adjacent roofs, windows and adjoining equipment and spaces are mandated per the building code section BC3309. These measures are indicated in the site safety plan which would need to be provided and reviewed for our acceptance. (32)

Response The PANYNJ is developing specific plans for the implementation of a safety plan, and specific design and operations of overhead protection (i.e. scaffolding). The PANYNJ will evaluate the utility of pedestrian managers and locations where they could potentially improve pedestrian conditions or improve safety. This will be developed in coordination with NYC DOT and regular updates will be provided to the community as appropriate.

Comment Group 122 What is the purpose of the recommended temporary pedestrian overpass from the SSF to the NE corner of Ninth Avenue and West 41st Street and will it be ADA compliant? How much sidewalk space will it use at that corner? The impact on pedestrian circulation on the sidewalk for residents and other northbound commuters should be studied and published. (15) The impacts for pedestrian flow during construction as well as after the completion of the project will be substantial. The draft EIS is woefully underestimating how much mitigation will be necessary. Widening the sidewalks and removing barriers to circulation will be helpful, if possible. (27)

Response The temporary pedestrian overpass mentioned in the DEIS is no longer part of the plans for construction logistics. Pedestrian and traffic conditions during Phase 2 of the construction of the Replacement Facility were revised and can be found in **Appendix B.7 “Construction.”**

Comment Group 123 Please describe how access for emergency services (ambulance, fire, police) will be impacted by construction. (23)

Response Construction activities which would modify, limit or reduce access (through activities involving changes to the public right-of-way) to facilities within the construction zone, or to private property adjacent to the construction, would be reviewed with both NYC DOT and appropriate emergency services.

Comment Group 124 Chapter 14.5.5.3: The section does not outline how it has been determined that there is no adverse impact on the neighborhood character. Additionally, this section would benefit from a discussion or reference to the extensive public outreach conducted on the design of the proposed project. (5) I request that any of the Port Authority’s (PA) programmatic and design decisions be viewed thru this lens (safety, health, and well-being) and that the PA mitigate impact of project, from construction thru resulting end product, with an objective to improve neighborhood health/quality-of-life. (116)The assessment of neighborhood character was conducted consistent with the guidance of the New York CEQR Technical Manual, Chapter 21, Neighborhood Character. As described in Appendix 3D, Neighborhood Character, of the DEIS (Appendix A of the FEIS), the assessment identified the defining features of the existing neighborhood character and then evaluated whether the Proposed Project would have the potential to affect those defining features, either through the potential for a significant adverse impact or a combination of moderate effects in the relevant technical areas. Based on the evaluation of the potential impacts associated with the Proposed Project, relative to the defining features of the neighborhood, the assessment concluded that the Proposed Project would not result in a significant adverse impact on neighborhood character. The PANYNJ has committed to minimizing, avoiding, or mitigating potential impacts associated with construction of the Proposed Project. Construction mitigation measures are described in Appendix B.8, “Mitigation,” of the FEIS and include measures to address concerns related to air quality, noise, and exposure to potentially hazardous or contaminated materials. In addition, the FTA will continue to monitor the implementation of mitigations during construction oversight. Following completion of the Replacement Facility, the Dyer Deck-Overs would be converted to approximately 3.5 acres of publicly accessible open space, which would be expected to improve the pedestrian experience in the neighborhood.

Comment Group 125 The DEIS states that representative sites were chosen for construction impact analysis and that significant adverse impacts will be avoided through a combination of efficient construction equipment, vibration monitoring plans, and MPT plans. However, due to the non-specific nature of the language of the DEIS, we were not able to evaluate impacts on our immediately adjacent properties. CHDC thus requests that more detailed site-specific analysis of Phase II construction impacts be disclosed on Block 1050, Block 29 in order to ensure that one noise and air

quality impacts do not significantly impact our residents, particularly the elderly who are at home all day. (25)

Response In the DEIS **Section 14.A.5.2.1 “Emission Control Measures”** of the Construction Appendix details how the PANYNJ will minimize emissions from the construction of the Replacement Facility. The PANYNJ will require that contractors utilize dust control measures, including the use of wet saws for concrete cutting, tenting of work areas or truck loads, watering to suppress dust during construction activities and on any unpaved areas of the work zone, and truck washing for vehicles departing the site. Air, noise and vibration monitoring will be performed for the duration of the construction of the Project. Should levels of emissions, decibels or vibrations unexpectedly exceed thresholds, the PANYNJ will alert the contractor and take measures to reduce any exceedances, as feasible.

Comment Group 126 The DEIS assumes that construction could last approximately eight years and might require a marine handling facility near the Project Site. While the Trust understands that a specific site for a marine handling facility has not been determined, it seems probable that any west side marine access would necessitate engagement and consultation with the Trust as the likely Entity with Jurisdiction. Accordingly, the Trust requests early engagement should PANYNJ consider pursuing this option. Hudson River Park is a heavily used public park that also includes various revenue-generating uses and properties, and the Trust should be part of any future discussions related to identifying a suitable site. (9) PANYNJ will continue to evaluate alternative solutions for one of which might employ barges. The intent of barging would be to deliver and remove a significant portion of construction materials from the Project Area to reduce the number of trucks required for construction. The operations would require the use of a marine handling facility, located in close proximity to the Project Site. Employment of barging could result in the potential for several adverse impacts, including those to traffic, natural resources, historic resources, air quality, and noise. These results point to the need for much more comprehensive mitigation than what is proposed. (15)

Response The use of barges will be further addressed as contractors are procured and provide details on how materials will be transported to and from the construction site. Should a contractor propose a logistics plan that involves the use of barges, the PANYNJ will coordinate with appropriate regulatory agencies to produce any required environmental review or evaluation of potential impacts for full compliance and disclosure.

Comment Group 127 Please describe the pest and rodent control maintenance and mitigation measures that will occur during and after construction. (23)

Response This detail was provided in Chapter 14 “Construction” of the DEIS (see **Appendix A** of this FEIS). Construction contracts would include provisions for a rodent (i.e., mouse and rat) control program. Before the start of construction, the contractor would survey and bait the appropriate areas and provide for proper site sanitation. During construction, the contractor would carry out a maintenance program, as necessary. Signage would be posted, and coordination would be conducted with appropriate agencies.

ENVIRONMENTAL ASSESSMENT

Comment Group 128 Per 40 CFR 1501.3(b), federal agencies are required to evaluate the potentially affected environment and degree of the effects of the action. The impact level definition and characterization of impacts are currently too broad to facilitate a meaningful assessment. EPA suggests developing finer scale impact level categories, which would also capture potential

differences in impacts across alternatives. EPA recommends that the DEIS include well defined impact level definitions (for example negligible, minor, moderate, significant) for each resource area. Clearly defined impact level definitions are essential in analyzing impacts across alternatives. EPA suggests that the beginning of each resource area chapter defines the appropriate specific impact levels and includes the rationale for the selected definition. (5)

Response Both the DEIS and FEIS provided the criteria standards by which impacts are determined, as well as the methodology to evaluate the technical area, and results of analysis, whether resulting in an impact or not, as a result of the Proposed Project. Neither Federal guidance, nor the CEQR Technical Manual provide for such a description of intermediate impacts, and there are no criteria by which such impacts are to be defined.

Comment Group 129 The DEIS includes Figure 2C-4 that demonstrates the proximity of private land use development projects to the project area. We recommend a similar figure be provided to show the locations of reasonably foreseeable and pre-existing projects (both transportation and other types of projects) within the study area. (5)

Response The FEIS **Appendix B.1 “Land Use”** includes figures of private development anticipated to occur regardless of the Proposed Project as well as descriptions of transportation projects (some of which include non-physical activities or policy / operational changes that do not have a geographic connection). Where transportation projects may include other development (residential, commercial) those developments are included in the figures.

Comment Group 130 EPA recommends the DEIS include a more robust cumulative effects analysis that considers the impacts of each of the alternatives in combination with all past, present, and reasonably foreseeable future actions within the geographic area. EPA reiterates the necessity for NEPA documents to consider cumulative impacts on the affected environment. The increase in energy and water demand in addition to the other projects which may occur in the area and region, may have wider implications than currently presented in the document. EPA suggests this be discussed in the document. In accordance with the 2020 CEQ NEPA regulations, “To the extent environmental trends or planned actions in the area(s) are reasonably foreseeable, the agency should include them in the discussion of the affected environment. Consistent with current agency practice, this also may include non-Federal planned activities that are reasonably foreseeable.” (40 CFR §1502.15). The CEQ NEPA regulations (Section 1508.1 (g)) effective as of May 2022 define effects or impacts to mean “changes to the human environment from the proposed project or alternatives that are reasonably foreseeable.” This definition includes cumulative effects, which are “effects on the environment that result from the incremental effects of the action when added to the effects of other past, present and reasonably foreseeable actions regardless of what agency (Federal or non-Federal) or person undertakes such actions.” EPA recommends the DEIS include a robust analysis of cumulative effects including all reasonably foreseeable projects within the area. The DEIS should include and analyze direct, indirect, and cumulative impacts, to assess anticipated impacts from past, present and foreseeable future actions and the incremental impacts the proposed project would add to this. EPA recommends the DEIS include a robust analysis of cumulative effects including all reasonably foreseeable projects within the area. In addition, the analysis should consider co-located projects and how concurrent development of the proposed project and these other projects may impact resource categories in the study area. (5) Was a cumulative analysis performed? (15) Please

describe how PANYNJ will measure environmental impacts from noise, dust, vibration, loss of sunlight, and loss of views. (23)

Response Comment noted. As described in **Appendix 2C, “Analysis Framework,”** and **Appendix 3A, “Land Use, Zoning, and Public Policy,”** of the DEIS, reasonably foreseeable projects (including those that would be non-Federal activities) within the study area were accounted for in the applicable analyses of the EIS. Following publication of the DEIS, the private land use development project list (*i.e.* those reasonably foreseeable projects that would occur within the study area, independent of the Proposed Project) was updated. The updated private land use development project list is incorporated within **Appendix B.1.1, “Land Use, Zoning, and Public Policy”** of the FEIS. FTA is following the CEQ NEPA regulation that was in effect when the NOI was published for the completion of this EIS.

Comment Group 131 EPA recommends that the executive summary include a table with the impact determination and timeframe (negligible, minor, moderate, significant – short term, long term) of the project impacts on each resource area to display a concise comparison between the alternatives. The table should show the impacts determination before AND after any proposed mitigation measures. Any benefits should be listed separately and not be “accounted for” in the impact determination. (5)

Response Comment noted.

Comment Group 132 EPA recommends including a table in this chapter that clearly displays impacts of the proposed project and mitigation measures being suggested. The currently included tables generally provide an indication of the existence of an impact but no detail on the nature and extent of the impact and therefore no way of assessing the efficacy of potential mitigation measures. (5)

Response Comment noted

Comment Group 133 As part of this cumulative impacts analysis, we recommend the document clearly identify communities that may be experiencing existing pollution and social/health burdens and consider how the proposed project may potentially result in disproportionate impacts within that context. Toward this end, EPA recommends considering conducting a baseline survey of environmental and public health concerns currently existing in the community. (5) The DEIS is lacking information and analysis of the short-term and long-term health impact on nearby residents and users of Port Authority Bus Terminal. These impacts will be further exacerbated by the long timeline of the project. We recommend an assessment and mitigating solutions in the final EIS using emissions data from similar infrastructure projects around the country and current health data available on postal zip codes 10036 and 10019. (15)

Response FEIS Appendix B.12 “**Environmental Justice**” describes how the EPA online EJScreen tool was reviewed to identify potential existing criteria pollutants and related health risks. PM_{2.5} was evaluated for operation of the Proposed Project and found to remain below the NAAQS, which have been established to protect public health. Further, the analysis determined that concentrations of PM_{2.5} would increase by an increment of 0.2 µg/m³ and 0.2 µg/m³ for the 24-hour and annual averaging periods, respectively, as compared to the No Action Alternative. These increments are less than New York City’s PM_{2.5} de minimis criteria, which are thresholds that the City set to ensure concentrations of PM_{2.5} would be minimized. FTA is following the CEQ NEPA regulation that was in effect when the NOI was published for the completion of this EIS. The Appendix was update to incorporate additional details on pre-existing health and pollution burdens and how those conditions may be associated with environmental justice communities. The analysis of air quality effects during

construction also showed that, while construction would result in elevated concentrations of pollutants, they would also remain below the NAAQS (see **Appendix B.7, Construction** of the FEIS). Elevated concentrations during construction would be temporary and localized to areas adjacent to construction activities. In addition, construction activities would be transient, such that they would not remain in one location for the duration of the construction period. The PANYNJ is designing the Replacement Facility to meet LEED Silver and Envision Gold ratings, in line with PANYNJ's Sustainable Building Guidelines.³ The Replacement Facility will be designed to accommodate electric bus fleets and provide convenience charging in the SSF.

Comment Group 134 The private tower should be considered as part of the cumulative impacts analysis even if not being considered in the detailed air emissions analysis. This would include cumulative impacts of construction noise, vibration, GHG emissions, air quality and traffic concerns. (5)

Response As described in DEIS Chapter 2, "Project Alternatives" (see **Appendix A**) the on-site private development towers are a component of the Proposed Project and would assist in funding the project. Accordingly, these commercial towers are analyzed as part of the Proposed Project and a cumulative analysis related to the private development towers would not be necessary. Traffic volumes generated by this private development were analyzed in the transportation analysis for the year 2040 (when the private development would be anticipated to be complete and occupied). The operational GHG emissions associated with the private development were included in the assessment of GHG emissions. The foundations of the on-site private development would be constructed during construction of the Main Terminal in Phase II and the construction analysis accounts for potential noise and vibration associated with the foundation phase of the private development. The subsequent phases (superstructure, exterior, and fit out) are generally less intensive from a noise and vibration perspective. While PANYNJ is not directly subject to New York City or New York State building or fire codes, PANYNJ has its own set of design and construction standards, which are based on nationally recognized building codes and engineering practices. PANYNJ reviews and approves all construction plans within its jurisdiction to ensure they meet or exceed these standards, and works in close consultation with local building departments, including the New York City Department of Buildings (DOB). The private development would not result in operational air quality impacts and would not represent a sensitive receptor. Separately, PANYNJ would evaluate design specifications to reduce GHG emissions prior to construction of the private development. In addition, water demand, wastewater generation, energy demand, and solid waste generation associated with the private development have been evaluated as part of the assessment of utilities and infrastructure.

Comment Group 135 There is no evidence that impacts to ADA elevators were studied. (15)

Response Under the No Action Alternative, the PANYNJ would continue to operate the existing PABT by undertaking necessary maintenance and an extensive set of structural and building repairs and upgrades. Given the extent of the repairs, the PANYNJ would need to make the facility compliant with the ADA. Installation of elevators, ramps and other requirements of the ADA are anticipated to result in a permanent net reduction of available bus gates by approximately 27% when the structural work is complete.

The new Main Terminal would be fully ADA-accessible, which would be a benefit to all facility users. As discussed in DEIS Chapter 4, "Socioeconomic Conditions" during Phase 2 of construction (2028-2032), the Proposed Project would remove existing elevators to the 42nd Street-Port Authority Bus Terminal Subway Station within the existing PABT. During this period, any passengers requiring use

³ <https://www.panynj.gov/port-authority/en/about/Environmental-Initiatives/clean-construction.html>

of an elevator to access the Eighth Avenue subway lines would have access to a temporary elevator near the temporary stairs to the subways station, which would be constructed prior to the removal of the existing elevator. Elevator access would be maintained for the duration of construction activities. During interim operations, all temporary gates within the SSF would be ADA-accessible.

Comment Group 136 We note that the Port Authority of New York and New Jersey (PANYNJ) is proposing a Programmatic Agreement for this project. We believe that a Memorandum of Agreement would be more appropriate, because this terminal replacement is a discrete project with a definitive timeline as opposed to an ongoing set of actions. (26)

Response This question was discussed and resolved as part of the Section 106 Consultation Process. The final Programmatic Agreement can be found **Appendix B.2.2** of the FEIS.

Comment Group 137 The DEIS indicates there is a Programmatic Agreement (PA) for the project, but the document is not available within the DEIS. EPA suggests including a reference to where the PA can be found and reviewed. (5)

Response The draft Programmatic was included in the DEIS as Appendix 6D “Draft Programmatic Agreement” and the final Programmatic Agreement can be found in FEIS **Appendix B.2.2 “Final Programmatic Agreement.”**

Comment Group 138 In response to the FTA and Port Authority of New York and New Jersey's February 2, 2024, NOA of the DEIS for the Port Authority Bus Terminal Replacement Project publication in the Federal Register, we have reviewed the DEIS and have no comments to offer. We appreciate the opportunity to review the document. (7) Natural Resources-MCB4 has no comment on this chapter. (15)

Response Comment(s) noted.

Reasonable Worst Case Development Scenario

Comment Group 139 I'm very concerned that there will be so much construction/demolition between a potential casino in Times Square and re-development of Penn Station that it will be utterly disastrous for residents that live and work here. Has this been factored into the project analysis? (72)

Response Yes, the assessment of potential cumulative effects of the LPA must consider other projects that may have similar timeframes or geographies, regardless of the implementing agency or entity. These background projects include various local and regional transportation infrastructure projects as well as private land use development. Appendix 2C, “Analysis Framework,” of the DEIS (found in **Appendix A** of the FEIS) details the transportation and private land use development projects that have been identified as meeting the above criteria. These were also updated in **Appendix B.1** of the FEIS “**Land Use and Public Policy.**”

Comment Group 140 EPA understands that the No Action Alternative incorporates extensive structural repairs to maintain the PABT in a state-of-good-repair. We are concerned that the No Action Alternative as currently presented may obscure the alternatives analysis by failing to distinguish between the contributions of the existing PABT and the future terminal to the affected environment. We recommend the DEIS disclose the impacts associated with the operations of the PABT in its current state, as well as those associated with the major improvements to serve as a baseline for the purpose of comparing outcomes of the Proposed Project Alternative. EPA believes the DEIS would benefit from an analysis of the current terminal's contributions to the impacts on

existing conditions (Air Quality, Noise, GHG) emissions, Public Health, etc.) and the replacement terminal's contribution to the future conditions. This presentation of data will allow for a more meaningful analysis of areas in where the existing terminal may be having an adverse impact on a resource area and allowing an opportunity for the replacement terminal to address that impact. (5)

Response The No Action Alternative presented in the DEIS and FEIS reflects the only condition that the PANYNJ believes is likely to occur, should the Proposed Project not advance. The existing PABT will not be able to operate at current (or pre-COVID) levels of capacity due to structural concerns within the terminal. There is not a reasonable alternative where the existing PABT, without significant structural repairs, and the commensurate loss of capacity, can remain operating in 2040.

Socioeconomic Conditions

Comment Group 141 The DEIS notes that as a result of the proposed project, there is the potential for displacement of small retail from within the current terminal which may serve existing environmental justice populations; please also describe the project's potential construction impact on existing small family businesses at 541-547 9th Avenue which have served environmental justice populations in the neighborhood for decades at an affordable price point. (23) I have a very specific concern. It involves the fabric, the existing fabric of the neighborhood, and in particular small businesses. And I'm especially concerned for those that stand immediately across Ninth Avenue from the existing Port Authority terminal and are right in the path of this development between 40th Street and 41st Street on the west side. There are two businesses in particular; a fresh fish store and the International grocery. They've been there for decades. They are neighborhood institutions, and they're an invaluable resource for members of the community because they provide really distinctive, good nutritious food at reasonable prices. It's somewhat heartening what I'm seeing from the plans that you've shown. It looks like the street-level development is not--hopefully, will not affect those buildings. And of course, it's those businesses, but it's also the buildings themselves--the distinctive character of our neighborhood. (57)

Response As described in Chapter 4 and Appendix 4A of the DEIS, incorporated within **Appendix A** of the FEIS, the Proposed Project would result in the displacement of approximately 23 businesses and 244 workers associated with those businesses, entirely within the existing PABT, as a result of the closing and demolition of the existing PABT. The Proposed Project would not result in indirect business displacement, direct or indirect residential displacement, or adverse effects to specific industries. Accordingly, no mitigation would be required with respect to socioeconomic conditions. PANYNJ would coordinate with businesses within the existing PABT, it is possible that some of these businesses may be relocated to the SSF during construction and then relocated back to the new Main Terminal following its completion. For each phase of construction, MPT plans would be developed to ensure the safety of pedestrian, bicyclist, and vehicle circulation near the project area. MPT plans would be coordinated with NYC DOT and would ensure construction activities would minimize potential effects to businesses.

Comment Group 142 How would the socioeconomic conditions improve due to direct economic benefits from the new construction for the local area? (27)

Response As described in the DEIS, Appendix 4B, "Economic Benefits Analysis," (located in **Appendix A** of this FEIS) construction of the Replacement Facility would create approximately 25,294 direct person-years in New York City. Assuming a 10-year design and construction period, the 25,294 person-years employment is the equivalent of about 2,529 people working full-time over a 10-year period in New York City. The economic benefit analysis determined that overall construction activities would generate approximately \$8.94 billion in labor income within New York

City, New York State outside New York City and within the NJTPA region. Furthermore, as described in DEIS, Chapter 4 “Socioeconomic Conditions” it is expected that existing businesses close to the Proposed Project would benefit from a larger customer base that would be created by the worker and passenger populations introduced or accommodated by the Proposed Project. Additional pedestrian activity from the worker and passenger populations would be introduced by the Proposed Project.

Comment Group 143 [Regarding] Socioeconomic Conditions: We are pleased that the proposed project would not result in any direct or indirect residential displacement. We also appreciate that the Port Authority will explore locations for the 23 existing businesses in the bus terminal to continue operations during construction and then be relocated back to the replacement bus terminal. We hope that local businesses are included in the expanded retail options in the replacement terminal. (4)

Response Thank you for your comment.

Community Facilities

Comment Group 144 Additional onsite and offsite community benefits must be provided to alleviate the enormous burden imposed on this area (which is subject to environmental justice protocol). (15)

Response The PANYNJ has collaborated closely with the community, elected officials and the City of New York to discuss the scope of the project, potential community needs and how the PANYNJ can best address them through the course of this project. The Authority will continue this dialogue and remains open to further ways it can support the community.

Historic Resources

Comment Group 145 Pages 6-17 outlines properties where there would be no adverse impact. However, this section relies on prior reports as opposed to integrating direct information from recent actions, namely the Paddy’s Market Historic District. For example, it calls out 408 West 39th Street as affected by construction but does not call out 411 West 39th Street, across the street, which will also be adjacent to Port Authority construction. Tenements are noted by address between 39th and 40th Streets (523-539 Ninth Avenue) but the DEIS does not note by address the tenements in the historic district (541-547 Ninth Avenue and 403-409 West 40th Streets). The properties most affected, being immediately adjacent to construction, are: 408 West 39th Street, 411 West 39th Street, 410 West 40th Street, Metro Baptist Church, 403, 405, 407, 409 West 40th Street, 541, 543, 545, 547 9th Avenue. (15)

Response The tenement at 408 West 39th Street and the tenements at 523-539 Ninth Avenue are specifically called out as historic properties because they are noted in the NYSHPO’s Cultural Resource Information System (CRIS) as being individually eligible for listing on the S/NR as well as being within the boundaries of the S/NR-eligible Paddy’s Market Historic District. They were likely determined S/NR eligible before the Paddy’s Market Historic District was determined S/NR eligible. In April 2022, the Paddy’s Market Historic District was listed on the S/NR, which was noted in the August 2023 Section 106 Addendum to the Assessment of Effects. To avoid confusion by removing 408 West 39th Street and 523-539 Ninth Avenue from the table of historic properties, the properties were kept in the table of historic properties with a note that they were also within the boundaries of the S/NR listed Paddy’s Market Historic District. Accordingly, the no adverse effects finding therefore still applies.

Comment Group 146 Regarding new Port Authority Bus Terminal redevelopment plans, a better bus terminal shouldn't come at the expense of light and views of our beloved landmarks (the historic churches and McGraw-Hill Building.) (46)

Response The PANYNJ has worked to balance the needs between a modern bus facility that can meet the demands of hundreds of thousands of daily users with the historic properties surrounding the existing PABT. Due to the proximity of historic or landmarked properties to the Replacement Facility (particularly the McGraw-Hill Building which directly abuts the west side of the terminal) careful analysis determined that effects on some historic resources was unavoidable. Regardless, the PANYNJ took several measures to minimize any potential loss of sunlight or views of these properties. In the case of the McGraw-Hill Building, earlier designs sited Tower 2 (private development of approximately 2M gsf atop the new Main Terminal) on the west side of the terminal, which would result in several additional hours of project-generated incremental shadow, and obscurement of views from the south. The view analysis also showed that the Proposed Project would result in a new or improved view of the McGraw-Hill Building from the southwest, through the addition of the publicly accessible open space created on the Dyer Deck-Overs. Additionally, the PANYNJ and the FTA have committed to a design review process where modifications to the on-site private development which would maximize sunlight and views will be given careful consideration. Lastly, the FTA and PANYNJ have committed to a detailed process of identifying and implementing mitigation measures in the affected churches / historic properties to compensate for the incremental shadows. Such mitigation measures may include artificial lighting or the removal of protective films that may reduce the amount of sunlight passing through stained-glass windows. Full details about design modifications and potential mitigation measures can be found in the final **Programmatic Agreement, Appendix B.2.2** of the FEIS.

Comment Group 147 The shadow study shows direct impacts on the Paddy's Market Historic District but claims no impact. The Historic District includes buildings built from 1850 to 1910 that have lintels, sills, architraves, and cornices. How the sun moves during the day creates the perception of those elements. Thus, if they are shadowed, that is a direct impact. (15)

Response The shadow analysis was performed following guidance of the CEQR Technical Manual, as detailed in **Appendix B.2.3 "Shadows"** of the FEIS, and appropriately identifies impacts on historic properties and sunlight sensitive receptors. Additional NEPA shadow analysis was performed, indicating limited duration of additional shadow effects on the Metro Baptist Church, which is within the Paddy's Market Historic District. Additional details on the NEPA shadow studies can be found in **Appendix D, "4(f) Evaluation"** of this FEIS.

Comment Group 148 We also ask that the agency work to minimize obstruction of views of the McGraw Hill Building's eastern façade. (4) Section 106 Consultation – The City would like the Port to continue to work with the agencies participating in the Section 106 Consultation, including the New York City Landmarks Preservation Commission, to reduce potential impacts to the McGraw Hill building. (11) We share our historic preservation colleagues' concern about the large mass of the two proposed towers, which will dwarf the buildings in the immediate area, increase shadows, decrease thermal comfort in the surrounding area, and block views to historic resources, including the McGraw-Hill Building, which is significant in the history of skyscraper construction and is considered the first expression of the curtain wall in a high-rise building. The McGraw-Hill Building's structure and cladding are noted for allowing large amounts of sunlight to reach the building's interior. We appreciate that Tower 2 was moved from the west to the east side in response to concerns from consulting parties, but more must be done to mitigate the issues of both decreased views to the landmark and quality of life for occupants of the McGraw-Hill Building. Material selection can help,

but the form of the towers will be an important factor. While we understand the funding mechanism and possible benefits new Class A commercial towers may bring to Midtown, we also hope that a flexible program can be pursued, as recent years have shown the possibility of an about face or seismic shift in our economic, social, and built environment. (21) We remain very concerned about the impacts of the two towers and the terminal on the McGraw Hill Building. To elaborate on our previously submitted comments, the McGraw Hill Building is significant as a transitional building that shows American architects' turn from the Art Deco style to the International Style that would then dominate for decades. This historic cultural pivot cannot be easily appreciated without viewing multiple facades of the McGraw Hill Building. With the addition of the two towers, the verticality of the fenestration on the East façade will become minimally visible and will not read as a contrast to the horizontality of the North and South facades. Impeding views of the McGraw Hill Building will forever deprive New York City residents and commuters who appreciate this building every day, and the many tourists who visit to see this iconic symbol of New York. (33)

Response We appreciate your comment and commitment to the historic resources of this area of New York City. Several design requirements informed the height of the new Main Terminal, including vertical clearance standards established by AASHTO, providing a sufficient number of gates to accommodate both future demand and buses currently operating at curbside locations, and the ability to fit modern bus fleets (which are using increasingly longer and taller buses). Reducing the size or height of the new Main Terminal would result in the Proposed Project not meeting at least some of its purpose and need objectives. As analyzed in the EIS, the two commercial towers have the potential to result in obstruction of views and generate additional shadows onto the McGraw-Hill Building. The view analysis also showed that the Proposed Project would result in a new or improved view of the McGraw-Hill Building from the southwest, through the addition of the publicly accessible open space created on the Dyer Deck-Overs. The towers analyzed were sized to establish a maximum potential envelope and total size, but ultimately the size and design will be determined by the market and the design approach pursued by the developer.

Through the course of the Section 106 Consultation process, the FTA and the PANYNJ reviewed multiple options to minimize project-generated shadows and obstruction of view which could be caused by the Proposed Project. These efforts are detailed in **Appendix B.2** of the FEIS. The consultation process determined that Proposed Project results in adverse effects, but the Final Programmatic Agreement (Appendix B.2.2) establishes commitments for Concurring Parties from the 106 Process to review the design of both the new Main Terminal and commercial development and identify opportunities to further minimize or mitigate the potential adverse effects to the McGraw-Hill Building.

Comment Group 149 Provide funding to establish Paddy's Market Historic District Façade Improvement Fund, administered by the HYHK BID, to assist small storefront owners and operators to make storefront and façade improvements. (15)

Response The PANYNJ has made a series of commitments to mitigate effects to historic properties, as practicable, resulting from the Proposed Project. These commitments can be found in the Final Programmatic Agreement in FEIS **Appendix B.2.2**.

Comment Group 150 FTA found that the obstructed views and increased shadows created by the proposed project would constitute an adverse effect on the McGraw-Hill Building NHL. However, FTA found that the proximity effects of the proposed project on the aesthetic features of McGraw-Hill Building NHL would not result in constructive use of these Section 4(f) properties. The Department in consultation with the NPS, the agency that oversees the NHL Program, and the New York State

Department of Historic Preservation do not concur with FTA's Section 4(f) determination that there is not a constructive use. The NPS, the official with jurisdiction under Section 4(f) over the McGraw-Hill Building NHL, believes the new terminal encroachment on the building, and the addition of the two commercial towers as a component of the proposed project, is a constructive use and does result in the project substantially impairing aesthetic features and attributes of the McGraw-Hill Building NHL. These features (architectural profile as seen from street level) and attributes (sunlight reaching the inner space of the building) are considered important contributing elements to the value of the property. It is the NPS position that the proposed project will eliminate the primary views of this architecturally significant historic building, resulting in substantial impairment to its visual and aesthetic qualities. The additional height and volume of the new terminal directly abuts the McGraw-Hill Building NHL's east façade at 42nd Street, blocking street level views of the NHL from the east. This added terminal height will directly block the windows of approximately 6 additional stories of the McGraw-Hill Building NHL. In addition, the height of the new terminal is approximately 32' above the first setback, encroaching on an important design element of the NHL. The expected additional shadowing effect on the McGraw-Hill Building NHL from the proposed new higher and wider terminal, and the substantially taller commercial towers, ranges from 6 -12 hours daily (depending on the season). This additional shading would be significant and alter a key contributing feature, sunlight to the interior of the building of the NHL. The Department requests that FTA consult further with the Department and the official with jurisdiction (NPS), as it appears that FTA has not fully considered the substantial diminishment that the proposed project, shading in particular, will have on the McGraw-Hill Building NHL. In addition, under Section 4(f), FTA will be required to complete a Section 4(f) evaluation, and a determination must be made in consultation with the officials with jurisdiction over the property. (10)

Response A draft Section 4(f) Evaluation was prepared and published in the Draft EIS (Chapter 15 and Appendix 15A). Following the publication of the DEIS, as a result of the advancement of design, influenced in part by feedback from local stakeholders, refinements were made to aspects of the design of the Proposed Project. To help minimize potential viewshed obstructions of the McGraw-Hill Building, and in coordination with the Section 106 Consulting Parties and local stakeholders, the PANYNJ relocated the mechanical penthouse above the Main Terminal, reducing the approximately 177-foot building height by approximately 20 feet. Accordingly, the height of the new Main Terminal would exceed the height of the first setback of the McGraw-Hill Building by approximately 12 feet, representing a reduction of approximately 20 feet compared to the condition analyzed in the draft Section 4(f) Evaluation. The McGraw-Hill Building's Landmarks Preservation Commission (LPC) designation form does not identify a primary view but references the building's two distinct profiles: the building's stepped setbacks of the east and west profiles and the "slab" views of the north and south profiles. Similarly, the NRHP Inventory - Nomination Form for the McGraw-Hill Building does not define or discuss primary views of the McGraw-Hill Building. However, the nomination form does include a photo facing south from 42nd Street of the north façade of the building. Given the information contained in both the LPC designation form and national nomination form, it is FTA's view that there is no clear and obvious primary view of the building, but such a view would likely be the front-facing view that captures the characteristics defined in the Nomination Form and that is depicted in the photo that accompanies the Nomination Form. Separately, additional shadow analyses were prepared to evaluate the McGraw-Hill Building and are included in Appendix B.2.3, "Shadows," and the final Section 4(f) Evaluation (Appendix D) of the FEIS. The additional shadow analyses were prepared to evaluate and illustrate where and when potential project-generated incremental shadow would occur, and to determine how the existing shadows (generated by surrounding buildings) affect the McGraw-Hill Building throughout the shadow analysis periods.

The FTA and the PANYNJ have committed in the Final Programmatic Agreement (see **Appendix B.2.2** of the FEIS) to a design review process with the NYSHPO and Concurring Parties to review the design of the Main Terminal and commercial development to fully investigate any possible design solutions which may minimize the amount of project-generated shadow or obstruction of views to the McGraw-Hill Building. The FTA has determined that the Proposed Project would not result in a constructive use of the McGraw-Hill Building, and the basis for that determination is provided in Appendix D of the FEIS.

Open Space

Comment Group 151 As Blocks 5 and 6 of Bella Abzug Park are not built yet, they have not been included in the draft EIS. However, they should be included in the chapter on Open Space in the final EIS, as they will be well within a quarter mile of the project area. Noise, traffic mitigation, shadows, air quality and construction around the park must be considered. (27)

Response As part of the larger Hudson Park and Boulevard plan, three additional blocks north of Bella Abzug/Hudson Park are under construction as part of a phased development. The second phase was completed in 2023. At the time of the DEIS, two blocks remain to be completed totaling approximately 1.10 acres. The last phase is expected to be completed by 2028. However, only one of the two blocks falls with the study area, with a total of approximately 0.11 acres of new passive open space and .44 acres of new active open space. Accordingly, the passive open space was included in the analysis. Analysis was performed regarding the potential effects that the Proposed Project could cause for the open space and no adverse impacts were identified.

Comment Group 152 Since Teresa's Park and Astro's Dog Run are being directly displaced, the Port Authority must work with the community to identify Direct Displacement of Open Space. The temporary and permanent location for these two displaced green spaces, should be addressed including timeline, design, and construction. (Appendix 3C, page 5). (15)

Response Teresa's Park and Astro's Dog Run are on PANYNJ property and operated under a temporary space permit granted by the PANYNJ. The space permit allows termination of the current use with 30-days' notice, without cause. There is no requirement that current temporary uses are replaced, however, the PANYNJ looks forward to collaborating with the community around the potential to restore the existing spaces following construction or incorporate similar program into the design of future open space atop the Dyer Deck-Overs.

Comment Group 153 The new open space will be delivered in 16 years, and it will not include a large portion of space on the western side that has been used to install gantries. It is critical that more open space be delivered early to mitigate the air quality, noise, and transportation negative impacts on the community during the construction. The demand for open space will not only be local, shifting the interim terminal to the west, will also create a need for open space for those using the temporary terminal. Delivery of open space delayed until 2040. Please Confirm: The new open space will not be delivered until 2040, 16 years from now and it will not include a portion of the Dyer Avenue cut to the west that has been used to install Lincoln Tunnel toll gantries. It is critical that more open space be delivered earlier in the project to mitigate the negative air quality, noise, and transportation impacts on the community during construction. The demand for open space is not only for the local community: there will also be a need for open space for those using the temporary terminal. (15)

Response The structure supporting the Dyer Deck-Overs would be constructed in the first phase of the Proposed Project (2024 – 2028) and during Phase 2 (2028- 2032) would be used for bus operations while the new Main Terminal is under construction. The EIS analysis assumes that the

publicly accessible open space would be built by 2040 but does not preclude the open space being built earlier than 2040, but for logistical reasons, it cannot begin construction earlier than 2032. Further, creation of open space would not mitigate air quality impacts (which the EIS did not identify), noise impacts, or transportation impacts.

Comment Group 154 Passive Open Space Ratio – The City would like the Port to either provide more detail on the plans for new open space or use a smaller passive open space ratio for the most conservative approach to impact analysis. (11)

Response The design of the proposed publicly accessible open space (to be built atop the Dyer Deck-Overs) has not begun. With a completely undetermined program, the EIS assumes that the open space will be 50% passive and 50% active uses. Given that the Proposed Project will increase the amount of publicly accessible open space by nearly 3.5 acres, and does not add residential uses, the Proposed Project would benefit open space conditions in the study area, regardless of the percentage of the space assigned to active or passive uses. Accordingly, no revisions were made to the Open Space Ratio calculations.

Urban Design

Comment Group 155 Historic and Cultural Resources: We hear Community Board 4's concerns regarding urban design and visual resources, with changing view corridors on Ninth Avenue within the Paddy's Market Historic District resulting from the enclosed ramp structure. We understand the operational need for the ramp structure and the benefits that come with taking the buses off the streets, but we encourage the Port Authority to design the ramp structure in a way that creates the least disruption to the visual character of the neighborhood. (4) As previously noted in our response, view corridors are seriously affected along Tenth Avenue, Eleventh Avenue, West 40th Street, West 39th Street, and Hudson Boulevard and on Ninth Avenue where a two-level ramp system is replaced by a five-level double height enclosed structure. Because of the critical nature of the "Main Street" of Ninth Avenue, this change will affect neighborhood character in an important way. The new terminal and towers would limit or obscure views of the McGraw-Hill Building's east façade from West 42nd Street, West 41st Street, and Eighth Avenue. These impacts cannot be mitigated. (15)

Response The PANYNJ will investigate the opportunity to make any revisions that do not compromise the operations or core functions of the Replacement Facility which may also improve conditions of the public realm.

The FTA and the PANYNJ have committed in the Final Programmatic Agreement (see **Appendix B.2.2** of the FEIS) to a design review process with the NYSHPO and Concurring Parties to review the design of the Main Terminal and commercial development to fully investigate any possible design solutions which may minimize the amount of project-generated shadows or obstruction of views to the McGraw-Hill Building.

Comment Group 156 In Section 6 and Appendix 6-C of the DEIS, only pedestrian, motorist, and commuter views are taken into consideration and neighbor/resident views are given short shrift in the Urban Design and Visual Resources section. I am supportive of this project, but I believe far too much emphasis has been placed on the visual components of the 8th avenue terminal which will be built in an area without significant residential development, while a cluster of densely populated residential building in the 11th Avenue corridor already exist and no attention has been paid to the

fact that the residents of these buildings will now face a multi-level ramp structure on the back end of the project. (81)

Response The Urban Design and Visual Resources technical analysis was prepared in accordance with the FHWA's *Guidelines for the Visual Impact Assessment of Highway Projects*, which represents current best practices for conducting a thorough evaluation of visual impacts caused by a transportation project. The analysis has also been prepared in accordance with the CEQR Technical Manual (2021). Under the CEQR Technical Manual, urban design is defined as the totality of components that may affect a pedestrian's experience of public space. These components include streets, buildings, visual resources, open spaces, natural features, and wind. An urban design and visual resources assessment under CEQR must consider whether and how a project may change the experience of a pedestrian on a public right-of-way. Neither the NEPA or CEQR evaluation of visual resources considers views from private property.

Shadows

Comment Group 157 We also ask that the Port Authority work with Metro Baptist Church to ensure that they continue to get as much sunlight as possible in order to not negatively impact their urban rooftop farm. (4) Please Study the effects of shadows on the rooftop farm of Metro Baptist Church. The church, in conjunction with Rauschenbusch Metro Ministries, Clinton Housing Development Company, and MCCNY Charities, developed a small-scale rooftop farm in 2010. Planting began in 2011 and expanded further in 2012. The farm helps combat food injustice and stocks the Metro Baptist food pantry with healthy produce while providing a forum for community building and education. (15) How will the PANYNJ compensate for potential loss of the HKFP? Metro/RMM is open to exploring potential relocation of the farm to another site/roof that could be maintained by the Metro/RMM staff and volunteers, similar to the way it is managed today. HKFP's success is in large part due to the amount of sunlight that reaches the roof. Recent developments, including Hudson Yards, have already impacted the amount of sunlight on the roof. Based on the DEIS shadow study, there will be over 6 hours less sunlight in the summer months. This will have a significant negative impact on HKFP's ability to continue growing fresh vegetables. (32)

Response The shadow analysis was performed following guidance of the CEQR Technical Manual; the rooftop farm atop the Metro Baptist Church is not considered a sunlight sensitive receptor or a contributing aspect to the historical character of the property and thus was not evaluated as being potentially impacted as a result of the Proposed Project. The PANYNJ however is looking at design modifications that may allow additional sunlight to reach the rooftop and will be working with the Metro Baptist Church to identify ways to allow their operations..

Comment Group 158 The City would like more detail on the potential for incremental shadow impacts on open space areas. (11) Of the six open spaces listed, four of them have incremental shadow impacts ranging from 38 minutes to 50 minutes. These are not major impacts. However, the other two have incremental shadow impacts of 1 hour and 51 minutes from 3/21-9/21 at McCaffrey Park and 1 hour and 12 minutes from 5/6-8/6 at Bella Abzug Park. In a community district ranking low in open space, these impacts to open spaces are magnified, and impacts to McCaffrey Park and Bella Abzug Park are major. (15)

Response As explained in **Appendix 6B "Shadow Analysis"** of the DEIS, the hours when the shadows occur are not the hours when the open space is most likely to be used / impacted per CEQR. The shadow impacts at Bella Abzug Park between May 6 and August 6 occur from 6:27 a.m. to 7:39 a.m. The impacted times largely fall with 1.5 hours after sunrise and are not considered significant under CEQR. The shadow impacts at McCaffrey Playground between March 21 and September 21

occur from 10:48 a.m. to 12:39 p.m. Shadow analysis was updated in the FEIS and the latest results can be found in **Appendix B.2.3 “Shadows”** of the FEIS.

Comment Group 159 We also support the NYSHPO’s request for a Design Review Committee for the project which will undertake a shadow impact consultation and explore scenarios for lowering the heights of the proposed private development towers. We believe this is necessary for the mitigation process because the PABTRP’s shadow impact on the McGraw Hill Building fundamentally alters the building as a conceptual design. As PANYNJ’s own DEIS Shadow Analysis acknowledges, the McGraw Hill Building’s “structure and cladding are noted for allowing large amounts of sunlight to reach the building’s interior.” The project’s shadow impact, which is a direct result of the height and bulk of the proposed private development towers, eclipses the sunlight that would otherwise reach the building’s interior and thereby irrevocably alters the conceptual, aesthetic and functional intent of the McGraw Hill Building. We disagree with PANYNJ’s assertion that the long construction timeline for the proposed towers atop the terminal is in and of itself a mitigation of their impact. When PANYNJ notes “there would be a period of several years before the private development towers are built...Accordingly, the condition of a new Main Terminal without commercial development atop would exist for several years at a minimum,” we maintain that the towers’ ultimate impact on the McGraw Hill Building and other surrounding historic resources is not mitigated by the mere fact that the construction of the private tours will take several years. (26)

Response The DEIS did not state that the construction timeline or any period of time following the completion of the Replacement Facility before the on-site private development would be constructed served as any type of mitigation. The EIS states that the Proposed Project will result in an adverse effect to the landmarked McGraw-Hill Building. As detailed in **Appendix B.2** in the FEIS, the FTA and the PANYNJ performed extensive analysis to identify alternatives that would minimize or mitigate these effects, and through the relocation of Tower 2 from the west side of the Main Terminal to the east side, reduced several hours of project-generated shadow that would reach the McGraw-Hill Building due to the Proposed Project. As a result of the Section 106 Consultation, the FTA and the PANYNJ made a commitment (see the **Final Programmatic Agreement in B.2.2** of the FEIS) to work with the NYSHPO and other concurring parties to review the design of the Main Terminal and the commercial development to identify opportunities to minimize or mitigate these adverse effects.

Transportation

Comment Group 160 Table 9B-6/7 – Base year: The numbers provided as a base for traffic on Ninth and Eleventh Avenue point to insufficient/deficient analysis: Numbers provided for 2019 are very different from the reality observed on the ground. For vehicular traffic there are additional peak hours that must be studied and taken in consideration: From 11:00 p.m. to 1:00 a.m. the volume of vehicles entering the tunnel from West 37th Street is significant as people are coming out of theaters, restaurants, and shows. There are around 2,000 residents facing that street. Such a peak will be relevant during the construction period when certain Lincoln Tunnel entrances will be closed. On Saturdays and Sundays in the afternoon and evening the traffic is very heavy due to people going or returning to New Jersey and the fact that only three tunnel lanes are open. The Eastbound P.M. traffic is heavy on West 36th Street and Ninth Avenue due to workers returning to New York and dinner and theater crowds coming in and exiting Lincoln Tunnel. We note that the models used as a base line depiction of Hell’s Kitchen traffic do not match the reality on the street. Once the base line is corrected, we expect the impacts to worsen. What were the assumptions for taxis placements and trips? Please explain how the delays at West 37th Street and Ninth Avenue - entrance to Ramp C -

will naturally be reduced because of the project? And how the delays at Eleventh Avenue and West 45th Street will be even further reduced because of the project? (15)

Response As detailed in **Appendix B.4.2 “Traffic”** the traffic analysis was developed using the CEQR methodology and in close collaboration with NYC DOT. Traffic counts were gathered in 2018, and subsequently updated in 2021 and 2023 to reflect the latest conditions. Traffic conditions may vary considerably at any given time due to street closures, local emergencies or vehicular accidents. The operational traffic modeled for this environmental review analysis intends to show a “typical” condition (i.e., no events, closures or accidents) with conservative factors related to vehicle and pedestrian movements built into modeling. The PANYNJ has reviewed the methodology and findings of the traffic analysis with Community Board 4 and is committed to continuing the dialogue about ways that local traffic could be improved, whether related to the Proposed Project or not.

Comment Group 161 The current study area is too limited and needs to be expanded to include Tenth Avenue from 23rd to 30th Streets. This section of Tenth Avenue is already heavily impacted by the queues of vehicles entering the Lincoln Tunnel at West 30th Street. It will be important to understand the traffic impacts during construction when certain Lincoln Tunnel entrances are closed. Further, a new interim bus terminal is being created at West 30th Street and it is crucial to understand its impact on everyday traffic and the Tenth Avenue queues. (15)

Response The methodology for defining the traffic study area is described in the DEIS, Chapter 9, “Transportation” and Appendix 9F “Technical Memorandum” (see FEIS **Appendix A**). The traffic study area was developed in accordance with NEPA and as applicable, in accordance with the methodologies established under SEQRA and New York City’s *City Environmental Review Technical Manual, 2020 Edition* (the CEQR Technical Manual) to identify the potential for impacts. The traffic study area identified for the Proposed Project consisted of major traffic routes leading to and from the Proposed Project site. The Proposed Project study area is bounded by West 50th Street to the north, Sixth Avenue to the east, West 30th Street to the south and Twelfth Avenue to the west.

As documented in the DEIS, Chapter 10, “Construction,” PANYNJ prepared a traffic analysis to understand the traffic impacts during construction, including the closure of certain Lincoln tunnel entrances. The PANYNJ has begun a comprehensive planning and coordination effort through a Transportation Management Plan (TMP). The TMP provides operational plans, best practices for deliveries, along with projections about vehicle and transit conditions. The TMP would then inform a Traffic Management Center (TMC) that the PANYNJ plans to establish for construction coordination. Both the TMP and the TMC are specifically intended to respond to the unforeseen conditions that are unlikely to arise on construction projects, identifying issues and potential solutions as far in advance as possible.

Comment Group 162 We echo Community Board 4’s concerns about adverse impacts to traffic, pedestrian sidewalks and crosswalks, and subway stairs. We urge the Port Authority to work with DOT and the MTA to implement mitigations, including interventions already studied as well as any other options for providing further relief. (4)

Response Thank you for your comment. Please see **Appendix B.8 “Mitigation”** associated with this FEIS for the discussion of mitigation measures.

Comment Group 163 We fully understand the need for a new terminal to address the capacity and structural demands. However, we ask that the Port Authority continue to monitor estimates of future demand, given that the long-term assumptions were done in 2015. The Port Authority believes their long-term forecasts are still accurate, despite decreased ridership during the Covid-19 pandemic,

even if the anticipated ridership occurs later than the 2040 timeline. The new terminal should still be built to accommodate the anticipated future demands, but the Port Authority should make sure their numbers are up to date. We appreciate that the proposed project will help to mitigate the anticipated future bus trip demand, take buses off city streets, and improve commuter experiences. (4)

Response The PANYNJ is committed to constructing a project that addresses the forecasted growth of commuter and intercity bus travel across Hudson River. As detailed in DEIS Chapter 1, “Purpose and Need” and DEIS Chapter 9, “Transportation” (see FEIS **Appendix A**) the demand for bus service, and the future volumes of buses operating in Midtown Manhattan were developed by the PANYNJ in the Trans-Hudson Commuting Capacity Study. The study developed a trans-Hudson travel demand forecast between 2013 to 2015 to support planning efforts. This forecast was recently updated in 2022 using new socioeconomic and demographic data, as detailed in Appendix 1A, “Purpose and Need.” While the 2022 forecast includes the latest demographics available, it does not account for the changes created by the 2020 COVID-19 pandemic. Counts for traffic and pedestrians that occurred later than March 2020 were compared against 2019 (pre-COVID 19) counts and adjusted to make them consistent, balancing the different observed levels with potential background growth and other development factors. Adjustments were developed in coordination with NYDOT and NYCT. Furthermore, Surveys of office employers and data collected on Manhattan’s occupational mix found that the “new normal” for commuting to Manhattan workplaces is anticipated to be roughly 11-16 percent lower than before the pandemic. While this is a meaningful reduction in commuting activity, it does not alter the need for the Replacement Facility with significant additional capacity to absorb growth and accommodate the increase in activity.

Comment Group 164 Were the average daily vehicle trips which are expected to average 403 (231 construction worker and 172 truck Passenger Car Equivalent) included in the traffic delays calculations? Did these estimates include the bus movements on city streets? (15)

Response Yes, as detailed in Chapter 14 “Construction,” of the DEIS, (see FEIS **Appendix A**) construction related traffic impacts were analyzed during each construction phase of the Proposed Project. Construction of the Proposed Project would include two phases of work, tentatively scheduled to be completed in 2028 and 2023, respectively. The analysis used peak construction activity numbers resulting in a higher number than listed in the comment above with a daily average of 762 construction workers in Phase 1 and a daily average of 1,635 daily workers in Phase 2 traveling to and from the construction site. In response to the question regarding bus movements, the construction analysis did analyze potential impacts on buses during Phase 1 and Phase 2. For more information, please refer to Section 14A.5.1.2 of Appendix 14A in the DEIS.

Comment Group 165 The following descriptions are not accurate and need to be revised. Corrections would change the results of the analysis. The tenth Avenue bike lane is on the west side of the avenue – not the east side. Hudson Boulevard East between West 33rd and West 35th Streets are being converted into a shared street this year, as approved by DOT. The identification of designated bike lanes and shared bike lanes is missing the following: Seventh, Eighth, Ninth, Tenth, Eleventh Avenues, full length of West 38th and West 39th Streets and West 43rd and West 44th Streets within the study area. These bike lanes must be taken in account. They will impact the results of the analysis. The impacts on cycling were not studied. (15)

Response Per the CEQR Technical Manual (2021), PANYNJ is not required to complete analysis to identify whether the Proposed Project will have impacts on bike lanes. The location of the bike

lane would not affect any analyses of traffic conditions. The curbside bus operations located along Hudson Boulevard East during Phase 2 Construction have been relocated.

Comment Group 166 Mitigation (pages 9-32) indicates that “Overall, 14 of 58 intersections were able to be mitigated through these measures in the a.m. model, and 13 of 58 intersections in the p.m.” It is not clear where the 58 number is coming from. As indicated above, another section refers to 53 and 64 intersections needing mitigation. (15)

Response The number 58 is correct. As detailed in Chapter 9, “Transportation,” (see FEIS **Appendix A**) PANYNJ studied a total of 89 intersections in the traffic analysis. The traffic analysis found that 58 out of the 89 intersections could experience significant adverse impacts because of the Proposed Project. In other words, 58 intersections warrant mitigation. The technical team then applied several standard CEQR approved mitigation efforts to the 58 intersections to determine whether implementing these mitigation efforts would reduce or eliminate the impact. The numbers in the comment above refer to the results of applying the mitigation efforts. Overall, 14 out of the 58 intersections could be mitigated in the AM and 13 out of the 58 intersections in the PM after applying potential mitigation efforts.

Comment Group 167 None of the intersections along Eleventh Avenue south of West 42nd Street have been analyzed. Eleventh Avenue is two-way below West 40th Street and carries heavy traffic going North to the Lincoln Tunnel. It is expected that this segment will be used during construction as well. It was not studied. In the afternoon, Eleventh Avenue north of West 43rd Street is very congested although it is shown with an acceptable LOS in the analysis. The intersection of West 37th Street and Ninth Avenue is shown as a LOS C or D in 2032 even though it is one of the most congested in the p.m. in the study area. Currently West 38th Street on Ninth Avenue is extremely congested in the p.m. but it is shown as a LOS of A, B, C. West 36th Street and West 37th Street serve as cross-town thoroughfares between the Lincoln Tunnel and Queens Midtown Tunnel with West 36th Street running West-East and West 37th Street running East to West. They are extremely congested respectively in the morning and the evening. (15)

Response Please refer to Appendix 9.B “Traffic Analysis” of the DEIS (see FEIS **Appendix A**) for analysis of traffic conditions throughout the study area, including Eleventh Avenue between West 51st Street to the north and West 30th Street to the south. Multiple traffic counts (2019, 2021 and 2023) were performed through the course of the EIS’s analysis and reviewed with NYC DOT.

Comment Group 168 Please Study: The construction period for the Project assumes the use of West 30th Street for 55 bus movements and 18 curbside parking, pickup, and drop-off locations to accommodate 90 bus movements in the p.m. peak hour. We note below that some of these locations are not viable. Further, their impact on traffic and pedestrians has not been studied. Dyer Avenue between West 35th and West 36th Streets has no sidewalk. Hudson Boulevard East between West 33rd and West 35th Streets is being converted to shared streets. NYC DOT has already approved a “shared street” for those two street segments. Implementation will occur in 2024. The shared street removes parking from the street and there will only be one through lane for vehicle traffic. There is an entrance to a major office building on Hudson Boulevard East between West 34th and West 35th Streets. Similarly, West 35th Street between Hudson Boulevard West and Eleventh Avenue has only one travel lane and no parking lane due to construction. (15)

Response The locations for curbside bus operations during Phase 2 of the construction of the Proposed Project, proposed in the DEIS (see Appendix 9.A ‘Bus Services’) were modified in response to the future plans for Hudson Boulevard to become a shared street. There are many future conditions that may change the status of curbside location that cannot be determined at this time,

but the EIS provides the locations, and corresponding analysis as an example of how buses may operate during Phase 2 of construction. When this plan is implemented, it will require an update of curbside activities, and careful coordination with bus operators and the approval of NYC DOT.

Comment Group 169 The analysis does not reflect the negative impacts caused by increased surface traffic generated by the project on MTA bus service M11, M12 and M42 lines. These effects should be studied and mitigated. The analysis does not include the impacts on the elevators. With a large NORC (Naturally Occurring Retirement Community) (Manhattan Plaza) located one block away, bus service is crucial to the neighborhood. (15)

Response MTA bus lines M11, M12 and M42 were identified in DEIS Appendix 9F, “Travel Demand Factors Technical Memorandum: 2040 Build Condition” as providing service near the PABT. A trip generation analysis was performed for the Replacement Facility and the on-site private development associated with the Proposed Project and the overall volumes of trips generated indicated that a Level 2 screening was required for the AM and PM peak periods. The Level 2 screening indicated that a detailed analyses should be performed for the M11 and M42 bus routes, among others. All detailed transit analysis for bus systems is being coordinated with the MTA and NYCT.

The new Main Terminal would be fully ADA-accessible, which would be a benefit to all facility users. With temporary operations starting in 2028 (and continuing through 2031 with construction of the new Main Terminal), the Proposed Project would remove existing elevators to the 42nd Street-PABT Subway Station within the existing PABT. During this period, passengers requiring use of an elevator to access the Eighth Avenue subway lines would have access to a temporary elevator near the temporary stairs to the subways station, along Eighth Avenue between West 40th and 42nd Streets. The temporary elevator would be constructed prior to the removal of the existing elevator. Elevator access would be maintained for the duration of construction activities. During interim operations, all temporary gates within the SSF would be ADA-accessible.

Comment Group 170 The Transit Study Area should include impacts on the delays and reliability of the M11 bus during the interim bus operations (West 30th street and West 37th/West 39th Streets deck over). What will be the impact of the project on the Penn Station MTA subway stop? (15)

Response MTA bus line M11 is identified in Appendix 9F, “Travel Demand Factors Technical Memorandum: 2040 Build Condition” as providing service near the PABT. A trip generation analysis was performed for the Replacement Facility and the on-site private development associated with the Proposed Project, and the overall volumes of trips generated indicated that a Level 2 screening was required for the AM and PM peak periods. The Level 2 screening indicated that a detailed analyses should be performed for the M11 bus route, among others. All detailed transit analyses for bus systems are being coordinated with the MTA and NYCT. Only the M20 route, which operates on Seventh and Eighth Avenues, would exceed capacity as a result of the Proposed Project and result in a significant impact which would be mitigated by the MTA providing additional bus service in the AM period for the M20 route. The Penn Station MTA subway stop is not part of the Transit Study Area. Transit locations where the total project-generated pedestrian trips equaled or exceeded 200 per hour in any peak period were added to the Transit Study Area, a threshold not met at the Penn Station MTA subway stop.

Comment Group 171 Please describe any temporary changes to City bus routes and how they will impact residents and businesses. (23)

Response City bus routes may be affected during the construction of the Proposed Project. Multiple roadways would have lane closures or be closed entirely or would have certain turns or use restrictions. These conditions, as detailed in DEIS Chapter 14, "Construction" (see FEIS **Appendix A**) and its associated appendices, would affect bus operations and increase the likelihood of delays and service disruptions. Construction activities which may affect (directly, or due to proximity) transit services (including local bus service or subway infrastructure) would require coordination with the MTA or NYCT.

Comment Group 172 While it was mentioned in the DEIS that curbside intercity operators would be encouraged to move into the redesigned PABT, there was no accounting for current curbside intercity bus operations nor calculation of future growth for intercity bus service. In some markets we see 5-10 new intercity curbside operators added each year. Since the end of the pandemic, we are seeing similar growth in the intercity bus industry as operations and ridership return to pre-pandemic levels and are beginning to exceed them, but we did not note such similar growth projections in the DEIS. We believe that a survey of permitted curbside spots over time could be a key indicator for future growth (if there is opportunity for expansion) at new PABT facilities. We think an assessment of intercity and curbside usage should be considered for the redesign project as we do not think the projected design of the new PABT will have enough bus slips to accommodate current operations and will fall far short of the needs necessitated by future ridership growth and additional entrants to the intercity and commuter bus markets. We do believe that the Project currently relies on bad data, ignores current growth trends, minimizes consideration of the environmental and economic benefits that the motorcoach industry provides, and potentially limits equitable parking access to all populations. (19) I am writing today in my personal capacity about inter-city buses at the proposed new bus terminal, a project I support. When the environmental effects of the plans for this new bus terminal are being evaluated, the devastating effects of inter-city bus terminal closures on bus passengers must be described -- especially the isolation that results for many people who, otherwise, cannot drive. It is important that the revival of inter-city bus travel be encouraged -- and that can be accomplished by building an attractive and welcoming bus terminal for inter-city travelers at the heart of America's greatest city. And provide room to grow. (103)

Response The forecast for total bus volumes by 2040 did incorporate intercity buses, operating within and adjacent to the terminal, as well as growth forecasts. The Proposed Project increases the number of gates dedicated to intercity buses to allow for accommodating intercity buses operating today outside of the PABT, as well as the existing intercity bus operations within the terminal, and factors in growth rates for both. In addition to the increase in bus gates specifically for intercity buses, there is a significant increase in the overall number of bus gates; intercity buses (which typically have different peak hours of operation than commuter bus services) would be able to use additional bus gates throughout the new Main Terminal, as they are available and with approval.

Comment Group 173 The DEIS also does not clearly identify how much space will be available for intercity bus storage and staging, regardless of where it is located. We request that demand forecasts for storage and staging of intercity buses be undertaken, using 2019 levels in the existing facility and at the 30th street lot as a base for inflation, ensuring that sufficient capacity is available throughout the construction period and in the completed facility through the design year. (18)

Response Bus storage and staging is an important aspect of the existing and future PABT operations. The plan to create a modern bus terminal is predicated on more efficient operations in

terms of bus storage and staging, and movement in and out of the Replacement Facility. The SSF would contain five levels for storage of up to approximately 300 to 350 buses. The PANYNJ will prioritize staging for buses serving commuters during the AM / PM peak and, when appropriate, review the Proposed Projects ability to accommodate operators requests for bus storage.

Comment Group 174 Greyhound is concerned about intercity bus operations during Phase 1 and 2 of Replacement Facility construction (2024-2032). The DEIS contemplates that there will be no intercity bus presence in the new SSF, either permanently or during the construction period. In addition, there apparently is no room for intercity buses on the temporary Dyer Deck-Overs between West 37th and 39th Streets. Instead, the DEIS proposes to establish an interim intercity bus facility at the PANYNJ's parking lot at West 30th Street, which it claims can accommodate 55 bus trips during the PM peak period. Greyhound is familiar with this lot, and we doubt that it can accommodate anywhere near 55 bus trips in a 2-3 hour peak period. In our view, the 30th Street lot is simply inadequate to accommodate service levels even close to what exists today at the PABT. The 30th Street location means that intercity bus passengers will lose convenient access to the City's transit hub at the PABT for many years. Indeed, intercity bus passengers, particularly those with baggage, will not even be within reasonable proximity to the 34th Street subway stations. The DEIS appears to agree that the 30th Street location is inadequate. It notes that not all intercity bus services can be accommodated on the 30th Street lot and at identified curbside locations. It states that there are 156 unaccommodated intercity, commuter, and jitney trips during the PM peak period. See DEIS, Appendix 9A, Pages 9A-16-19. The DEIS proposes to solve the problem by having bus operators to work with the City to identify more locations. Greyhound is confident that there will be dialogue with the City on this issue, but it is equally important for the PANYNJ to be involved in this dialogue. It is the PANYNJ that has created the location dilemma for intercity bus passengers by assigning them the least desirable locations, both long-term and short-term. There are significant passenger connections/transfers across modes that must occur at the PABT. They may not be able to be handled at 30th Street if it's inadequate and transfers cannot be accommodated across multiple locations. Without a well-developed interim plan, major disruptions will occur for customers connecting to other buses, the subway and public transit during the construction period. (18)

Response The interim off-street operations on West 30th Street described in DEIS Appendix 9A, "Bus Services" (see FEIS **Appendix A**) pages 9A-16-9A-19, are part of the No Action Alternative, in which PANYNJ would retain the existing PABT but would undertake extensive repairs of the terminal and its ramps over an approximately 10- to 13-year period to continue its safe use. PANYNJ estimates that, upon completion of the PABT repair efforts, capacity and associated operations would be reduced from the present 764 peak-hour bus trips to approximately 556 peak-hour trips (inclusive of both commuter and intercity), necessitating major modifications to commuter and intercity bus schedules and operations.

For the Proposed Project, the 2028 analysis year offers additional capacity to manage bus volumes relative to the No Action Alternative. Construction of the Dyer Deck-Overs, ramp structures and the SSF are anticipated to be underway from 2024 to 2028. During this four-year period, PANYNJ is proposing use an existing facility at West 30th Street for intercity buses. Operators can request curbside permits through the NYC DOT if they do not wish to use the interim site. When completed, the SSF would initially be operated as a temporary terminal, allowing the existing PABT to be demolished and cleared for the construction of the new Main Terminal. Following the completion of the Main Terminal in 2032, the SFF would convert to its long-term use as an SSF for buses serving the terminal. The Replacement Facility would provide for commuter and intercity bus storage and staging within the SSF. Intercity bus service would generally be accommodated on the upper floor of the new Main Terminal; however, the operational flexibility of the facility would enable intercity bus

service to utilize gates on other floors of the Main Terminal when available (*e.g.*, outside of peak commuting periods).

Comment Group 175 It is our understanding from conversation with the Port Authority that no buses will use the streets to access the terminal except for 90 buses maximum on West 41st Street from Dyer to Galvin Plaza at morning peak hour. (15)

Response Buses existing from the Lower Level of the new Main Terminal will continue to have the ability to exit onto West 41st Street via the Greyhound Tunnel in order to reach the Lincoln Tunnel heading in an outbound (westward) direction. This movement would be limited to the morning peak hour. The PANYNJ anticipates this volume of buses will be minimal but cannot commit to a specific number.

Comment Group 176 The proposed Port Authority Bus Terminal (PABT) Replacement Project would increase bus capacity and provide for up to five million gsf of commercial office space. In the existing condition, during the weekday morning peak period, vehicular congestion levels at the 16E Toll Plaza and NJ Turnpike are, at times, impacted by the operations of the XBL and PABT, particularly when there is an incident along the XBL and/or at the PABT. How would this existing condition be exacerbated by the proposed project and expected volumes increases? (13)

Response The Proposed Project would not be generating any additional bus trips that would be using the NJ Turnpike or Lincoln Tunnel. The new Replacement Facility is intended to better accommodate future growth that is forecast to happen regardless of the implementation of the Proposed Project.

Comment Group 177 The DEIS does not take into account the lack of motorcoach parking inventory elsewhere in the Manhattan downtown core, which increases the reliance and need for bus/motorcoach parking at Port Authority. More than 1,000 private buses pass through New York City on a daily basis in a variety of operational pursuits. This number increases to over 2,000 buses per day during the peak tourism season. Yet, over time the City's motorcoach parking inventory has declined from a high of several hundred bus parking spaces throughout the city to now less than 50. While a few metered parking spaces have been added in recent years, the motorcoach parking inventory has decreased overall since 2016, and free parking has largely been eliminated. Further, less than half of this current inventory is close to the tourism nexus. (19)

Response The PANYNJ will continue to work closely with bus service providers to determine how the new Replacement Facility can best meet their need.

Comment Group 178 In addition to dedicated traffic agents and coordination with appropriate city agencies to mitigate conditions exacerbated by the PABT replacement plan thru construction, EIS should... Note that West 36th Street serves as a crosstown thoroughfare running west to east between the W36th/Dyer Ave Lincoln Tunnel exit and the Queens Midtown Tunnel and must be given special consideration during this process. This route is heavily traveled by commuter and commercial traffic alike. (Similar conditions apply to W.37th Street running East/West between Queens Midtown Tunnel & Lincoln Tunnel). Any delay in traffic during peak times (AM rush hour, evening theater & dinner crowds) cause significant back-ups and delays on the mid-blocks, Dyer, 9th, and 8th Ave limiting emergency access, resulting in increased air and noise pollution. (116)

Response Comment noted.

Comment Group 179 The DEIS should explain what a daily walk-only trip signifies and why this would result in adverse impacts (pg. 14-15). (5)

Response A “walk-only trip” is a trip made between a starting origin point and a destination, that is made using only the mode of walking. Walk-only trips, in and of themselves, do not result in adverse impacts, but under conditions where there is a high number of walking trips, and a limited amount of space for these trips to occur, could lead to adverse impacts to pedestrian conditions on sidewalks and crosswalks.

Pedestrian Conditions

Comment Group 180 The Study Area for pedestrians should extend further south to West 30th Street, where Hudson Yards and Midtown West office complexes are located. Further, the West 30th Street interim bus terminal will be located in this area during construction. This terminal will take over a sidewalk and a narrow pedestrian path. The path to Penn Station may not have the necessary capacity to accommodate long distance travelers with luggage. (15)

Response The southern extent of the project study area is West 30th Street as shown in Figure 2C-2 in Appendix 2C. As specified by the CEQR Technical Manual, the first step in preparation for pedestrian analysis is to determine the specific locations of the pedestrian elements and facilities to be studied. The pedestrian analysis considers three pedestrian elements: sidewalks, corner, and crosswalks. Future demand for bus services at the Replacement Facility and new workers and visitors associated with on-site private retail and commercial towers determined the Proposed Project’s pedestrian trip generation. Trip distribution for pedestrians between the new Main Terminal entrances/exits, taxi, curbside pickup, offices, residences, and other generators of walking trips were developed based on mode split and the presence of existing and future pedestrian facilities. Locations where the total project-generated pedestrian trips equaled or exceeded 200 per hour in any peak period were included in the pedestrian analysis.

Comment Group 181 The City would like the Port to correct the shy distance calculations for a certain number of sidewalks in the study area in order to accurately assess the number of potential impacts to the pedestrian flows at those sidewalks. (11) What investments will be made to increase capacity of the XBL and reduce queuing and spillbacks that may occur through the 16E Toll Plaza and onto the NJ Turnpike mainline due to the proposed project? (13)

Response Pedestrian analysis performed for the DEIS has been revised in **Appendix B.4.3 “Pedestrian Conditions”** of the FEIS to include a shy distance calculation.

Comment Group 182 The impact on pedestrian circulation on the sidewalk for residents and other northbound commuters should be studied and published. (15)

Response Comment noted. PANYNJ completed a pedestrian circulation analysis to determine if the Proposed Project would have the potential to result in impacts to the local sidewalk and crosswalk network within the study area in terms of pedestrian circulation during construction and operations. This analysis has been revised in the FEIS and can be found in **Appendix B.4.3**.

Comment Group 183 The Proposed Street Improvement Projects (SIP) fails to include the sidewalk widening of the east side of Ninth Avenue from West 34th to West 51st Streets, which DOT has already committed to. Simulations and impacts need to be updated to incorporate this project. (15)

Response Comment noted. PANYNJ will continue to coordinate with the City of New York on parallel efforts such as the Proposed Street Improvements Project (SIP).

Air Quality

Comment Group 184 EPA also notes that there are discrepancies in the emission values reported in Chapter 10 and Chapter 14 and believe, because of this, the DEIS does not portray an accurate image of the expected air quality impacts from construction and use of the new bus terminal. We suggest these two chapters be reviewed together to make sure they align and convey all emission levels across crucial project years. Specifically, there are discrepancies in the emissions values provided in Chapter 10 and Chapter 14 that should be clarified in order to better understand the air impact analysis. Background values being used for the analysis for both chapters appear to be different for the PM 2.5 and PM 10 evaluation. EPA recommends using design values, at conservative levels, as background concentrations instead of one-year averages. (5)

Response Thank you for your comment. Please see revisions to both Air Quality and Construction analyses, found in **Appendix B.5** and **Appendix B.7** respectively.

Comment Group 185 The EPA Transportation Conformity Guidance for Quantitative Hot-spot Analyses in PM_{2.5} and PM₁₀ Nonattainment and Maintenance Areas (EPA-420-B-21-037, October 2021) requires construction that will last longer than 5 years to be included in a hot spot analysis. EPA understands that construction will take place over the course of the entire project but will be broken up into phases lasting less than 5 years each in different locations. This reasoning for not including a construction based hot spot analysis should be made clear within the text of Chapter 10. (5)

Response A PM₁₀ and PM_{2.5} hot-spot analysis, including both operational and construction-related mobile sources, was performed. The analyses was performed in accordance with the EPA Transportation Conformity Guidance for Quantitative Hot-spot Analyses in PM_{2.5} and PM₁₀ Nonattainment and Maintenance Areas (EPA-420-B-21-037, October 2021). Whereas construction hot-spot analyses are not required per transportation conformity, they are required to determine project-level conformity as well as compliance to NAAQS per CEQR due to construction lasting more than two years at one location. Conformity analyses generally focus on operation due to the long-term potential impacts; however, for the Proposed Project, maximum impact, although temporary, would likely occur during construction and bus terminal operations which will be ongoing from 2024 to end of 2031. Bus terminal operation will be maintained during construction. During 2024 to end of 2027, concurrent operation of the existing bus terminal and construction of ramps and a temporary bus terminal will occur to the west of the main terminal. During the 2028 to end of 2031 period, the existing terminal would be demolished, and the new Main Terminal would be constructed while temporary bus operations would occur at the SSF. As described in Appendix 10B of the DEIS, incorporated within **Appendix A** of the FEIS, the Interagency Consultation Group (composed of various federal, state and local air quality experts) concurred that the 2028 to end of 2031 period should be the focus of the analysis due to concurrent replacement terminal construction and temporary terminal operation. A detailed hot-spot analysis using dispersion modeling was performed to determine potential PM hot-spot impacts. The modeling demonstrated that 24-hour PM_{2.5}, 24-hour PM₁₀ and annual PM_{2.5} would be below the applicable NAAQS and the maximum predicted PM_{2.5} increments would be well below the respective PM_{2.5}.

Comment Group 186 EPA recommends that the DEIS include further discussion of the receptors including adjacent buildings and sidewalk receptors. The chapter might benefit from a figure with a conceptual depiction of the receptors and the evaluation that has been conducted. EPA suggests providing which receptor is being portrayed by the maximum values shown throughout Chapter 10. (5)

Response **Appendix 10B** of the DEIS, incorporated within **Appendix A** of the FEIS, contains an illustration of the proposed air quality receptor grid (Figure 5), as presented to and concurred with by the Interagency Consultation Group (which was composed of various federal, state, and local air quality experts).

Comment Group 187 The conclusion of Chapter 10 should repeat the explanation of the *de minimis* CO criteria to clarify the conclusion being made, and the criteria being used to reach that conclusion. (5)

Response **Appendix B.5 “Air Quality”** of the FEIS has been revised to include the restatement of the *de minimis* CO criteria at the conclusion.

Comment Group 188 EPA suggests that the potential for lead dust emissions during demolition and/or construction be evaluated either within the air quality analysis or construction air quality analysis. Any minimization and mitigation measures to address potential impacts related to lead should be provided in the DEIS. (5)

Response As detailed in **Appendix B.5**, airborne lead emissions are currently associated principally with industrial sources such as metal processing, battery manufacturing, and the burning of lead-containing waste. In the past, leaded gasoline was a major source of lead emissions; however, the ban of lead in gasoline under the CAA of 1970 has resulted in a decrease of lead in the air. Thus, an analysis of lead emissions is not warranted. As described in **Chapter 8** and **Appendix 8A** of the DEIS, incorporated within **Appendix A** of the FEIS, if hazardous building materials (including LBP) are identified within the existing PABT, they would be removed prior to demolition activities. The PANYNJ construction specifications would require the contractor to prepare abatement plans and work practices that prevent exposures of potentially hazardous building materials to workers and the public. Demolition activities with the potential to disturb LBP would be performed in accordance with applicable OSHA regulations including OSHA 29 CFR 1926.62 - Lead Exposure in Construction Methods for lead abatement and RCRA regulations.

Comment Group 189 EPA recommends that the DEIS provide clarity on the meaning of concurrent construction; does this include construction vehicles or additional vehicles from construction workers commuting in and changes in traffic patterns due to the construction. (5)

Response As documented in **Appendix B.7 “Construction”** of the FEIS, construction of the Proposed Project is anticipated to be completed in three phases – construction of the ramps, Storage & Staging Facility (SSF), and the Dyer Deck-Overs (Phase 1), construction of the new Main Terminal (Phase 2), and construction of the private development and conversion of the Dyer Deck-Overs into publicly accessible open space (Phase 3). The construction phases would occur sequentially. Concurrent construction describes the demolition and concrete activities that would occur simultaneously across the Dyer Deck-Overs, ramps structure, and the SSF during Phase 1 of construction. The construction traffic assessment includes analysis of vehicle trips that would be generated directly from construction activities (*e.g.*, workers, deliveries, equipment), and the implications of anticipated roadway modifications (*e.g.*, lane reductions, turn restrictions) or closures on general traffic for all three construction phases, including Phase 1.

Comment Group 190 The Air Quality Analysis should include at minimum a qualitative discussion of the cumulative impacts of construction and operation of the private development with ongoing operation of the replacement terminal. (5)

Response As described in Appendix B.5.1 of the FEIS, the Replacement Facility and the on-site private development associated with the Proposed Project are anticipated to be designed to operate with fully electric heating and hot water systems. Consequently, the Proposed Project would not include fossil fuel-burning heating and hot water systems for the Replacement Facility. Therefore, a stationary source analysis of these systems is not warranted. A CO microscale analysis was performed for a final analysis year of 2040. Year 2040 includes growth in bus ridership to the full forecast and the completion of the private development associated with the Proposed Project. The results of the mobile source analysis determined that the 1-hour and 8-hour CO total concentrations are substantially below the 1-hour and 8-hour standards of 35 ppm and 9 ppm, respectively, and the maximum predicted 8-hour concentration is below the CEQR *de minimis* CO criteria.

Comment Group 191 The discussion throughout Chapter 10 relies on the Federal NAAQS and New York City *de minimis* criteria to make determinations on the air quality impacts. While EPA acknowledges that the evaluation relies on a more stringent criteria than the NAAQS for CO and PM_{2.5}, EPA wants to emphasize that no violation of the NAAQS does not necessarily equate to no air quality impacts. The discussion in the Air Quality section should include further description of the modeled incremental increase in concentrations between the no action and the proposed project. Disclosing this information would support a more comprehensive understanding of the changes in air quality due to the project. (5)

Response Appendix B.5.1 of the FEIS contains air quality pollutant concentrations associated with the No Action Alternative (Future without the Proposed Project), and the Proposed Project. The modeled increments are presented, and emission values are compared to the appropriate criteria to determine the potential for impacts.

Comment Group 192 This chapter needs to more clearly define where impacts will be expected, what the level of impacts will be, where mitigation is necessary, and how much the mitigation will alleviate impacts of the proposed project. Additionally, there are discrepancies between the air quality chapter the Air Quality Chapter to clarify the methodology used and the air quality impacts section of the construction chapter. The air quality analysis conducted needs to consider the cumulative impacts of all emissions sources and clearly describe the impacts both locally and regionally. Even if not used for analysis, the worst-case scenario construction emissions year (2025) should be discussed qualitatively in as well as to provide a discussion of the cumulative impacts of construction and mobile source emissions. (5)

Response Comment noted. As detailed in Appendix B.5 and B.5.1 of the FEIS, the air quality assessment was performed consistent with the applicable requirements of NEPA, SEQRA, and New York City's CEQR. The particulate matter hot-spot analysis was conducted for year 2028. The Proposed Project construction period, in combination with continued bus operations, results in the highest diesel vehicle volume, as construction and bus operations occur simultaneously. Three intersections and associated streets leading to each intersection were selected as the worst-case analysis sites based on the diesel traffic volume comparison of the No Action Alternative and the Proposed Project. A detailed hot-spot analysis using dispersion modeling was performed to determine potential PM hot-spot impacts. The modeling demonstrates that 24-hour PM_{2.5}, 24-hour PM₁₀ and annual PM_{2.5} would be below the applicable NAAQS, and the maximum predicted PM_{2.5} increments would be well below the respective PM_{2.5} *de minimis* criteria. New York has established

an Interagency Consultation Group (ICG) of agencies with responsibility for transportation and air quality to coordinate the transportation conformity process statewide. The ICG reviewed the Proposed Project and determined that according to the transportation conformity regulations (40 CFR Part 93.127), the Proposed Project is an exempt project and therefore does not require transportation conformity analysis.

Comment Group 193 I don't think that the ramp building is enclosed. And so, what is the environmental impact versus enclosing it and doing some carbon capture? (49)

Response As described in Appendix B.5 and B.5.1 of the FEIS, an analysis of the naturally ventilated vehicle exhaust determined that the 1-hour and 8-hour CO total concentrations are substantially below the 1-hour and 8-hour standards of 35 ppm and 9 ppm, respectively, and the maximum predicted 8-hour concentration is below the *de minimis* CO criteria.

Comment Group 194 MCB4 is specifically concerned with language in the DEIS that states "air quality is not impacted" with the final product. We fully expect the Port Authority to provide a green and clean environment that betters current conditions. As with all the vehicle-specific areas, concentration should be not just on ventilation but filtration. While the conversion to electric buses is presented as a panacea, the Port Authority has no control over the speed at which this conversion will take place. (15)

Response Comment noted.

Noise

Comment Group 195 EPA understands that the background noise for the project area is currently at a level considered to be "Marginally Unacceptable General External Exposure" according to NYCDEP. Despite the proposed project resulting in a minor change in noise levels, the analysis does not address how much the operation of the existing bus terminal contributes to the background noise. EPA suggests that this chapter discuss how the existing terminal contributes to current noise levels and FTA consider other approaches for reducing the contribution of the replacement facility where possible. (5)

Response The terminal itself is not a substantial contributor to total noise levels at noise receptors in the vicinity of the project site because its mechanical equipment does not have line of sight to those receptors, and sources inside the building (buses, retail uses, etc.) are shielded by the building façade.

Comment Group 196 EPA suggests that noise monitoring be conducted during project implementation and that the DEIS discuss the development of a noise monitoring plan to be developed with input from local stakeholders. (5)

Response Thank you for the comment. The PANYNJ will be performing noise monitoring during the project implementation. Details of environmental monitoring during construction (including dust, air quality, noise and lead) will be detailed and discussed with the community stakeholders. The adaptive management process of responding to conditions, should monitoring detect levels approaching or crossing established safety thresholds is detailed in FEIS **Appendix B.7 "Construction."**

Comment Group 197 The existing highest 1-hour Leq sound level at Locations 6 and 6a is noted to be 80 dB(A). Please describe the 1-hour Leq sound levels throughout a typical day and night at these locations. This information is necessary to understand the acoustical environment in this location. (23)

Response The FTA Guidance Manual defines noise criteria based on the specific type of land use that would be affected, with explicit operational noise impact criteria for three land use categories. Categories 1 and 3, which include land uses that are noise-sensitive, but where people do not sleep, require examination using the 1-hour Leq descriptor for the noisiest peak hour. Category 2, which includes residences, hospitals, and other locations where nighttime sensitivity to noise is very important, requires examination using the 24-hour Ldn descriptor. 26 receptor sites, detailed in Table 11A-7, were selected to represent noise-sensitive locations that would have the greatest potential to experience noise level increases resulting from the Proposed Project. Noise measurements were conducted at survey locations to represent each of the receptors and the survey results were used to determine existing noise levels according to the FTA guidelines. Issues of site access and security at the survey locations prohibited 24-hour measurements. Instead, one-hour noise measurements were conducted during the AM peak, midday, PM peak and late-night time periods. Table 11A-10 presents the noise levels and incremental change in noise levels for the Proposed Project in the year 2032. The incremental change from No Action Alternative noise levels that would occur as a result of the Proposed Project in 2032 would not exceed 3 dBA. A change in noise level of up to 3 dBA is considered barely perceptible and not significant according to CEQR impact criteria. Consequently, the Proposed Project in 2032 would not result in potential adverse noise impacts and would not require mitigation at these receptor sites.

Hazardous Materials

Comment Group 198 Please confirm there's a detailed and thorough asbestos remediation plan in place to protect the neighborhood during demolition phases. (15)

Response Confirming that, if necessary, a thorough asbestos remediation plan will be in place to protect the neighborhood during demolition phases. As detailed in DEIS, Chapter 8, "Hazardous Materials" and its associated appendices, PANYNJ would conduct a comprehensive asbestos survey of the areas that would be disturbed before any construction activities that could potentially disturb ACM are performed. The survey would include sampling of suspect materials to confirm the presence or absence of asbestos. The identified ACM would be removed and disposed of before demolition and construction in accordance with all Federal, State and local regulations. Furthermore, an SMMP would also be developed to manage contaminated materials encountered during construction. The SMMP would provide procedures for materials handled during construction activities. The SMMP would also provide protocols for the protection of workers, contingencies for community air monitoring, and other procedures that would be implemented to protect public health.

Comment Group 199 Please Study through investigation by well to test for hazardous materials, the following locations: Immediately west of 409 West 39th Street (30 residential units); Immediately west of 408 West 40th Street (Metro Baptist Church, which is home to five social service and community programs), Head Start, operated by the Hudson Guild (75 children enrolled), New Alternatives for LGBT Youth (300 users), Damayan (Filipino domestic works, roughly 300 users), Metro Baptist Congregation (200 members), Rauschenbusch (RMM) Ministries (combination of food pantry, clothes closet, toiletries, 13,000 annual users, majority homeless families and individuals); Immediately north, under the existing bus ramps, of 401 to 409 West 40th Street, which have a total of 61 residential units. Given the findings from the wells that were tested, we request additional testing at the aforementioned addresses given the proximity to residential use and the high-volume

community facility located at Metro Baptist Church. In the review of Appendix 8D which is Phase II of the Environmental Investigation, various locations were tested for hazardous materials as per pages 41-43 of Appendix 8. There was a great presence of hazardous materials, for example, among many others, acenaphthylene, phenanthrene, arsenic, lead, fluoranthene, and mercury, which will require remediation as part of the proposed project. Of the 13 well sites for testing, only one, WSP-111, was immediately adjacent to an occupied building. There was no drill site nor soil testing to detect the potential presence of hazardous materials immediately adjacent to other occupied residential and community facility buildings within the project area. (15)

Response Please see **Appendix B.3** for the result of a Phase 1 Environmental Site Assessment performed in April 2024.

Infrastructure, Water and Sewer

Comment Group 200 It is our understanding from conversations with the Port Authority that it plans to collect all garbage in the complex from loading docks and not from the sidewalk. (15)

Response Solid waste generated by commercial and transportation uses would be collected by private commercial carters. Commercial buildings developed as part of the Proposed Project would be subject to mandatory recycling requirements for paper, metals, construction waste, and aluminum foil as well as metal, glass, and plastic containers. Specific details on how the Port Authority will collect garbage and remove waste will be determined later after the environmental review process is completed. The Port Authority will also coordinate closely with agencies responsible for waste management.

Comment Group 201 Section 12.5.1 shows the predicted increase in water consumption of 1.89 million gallons, or a 5.4-fold increase. Similar to the energy demand section, the document states that because the predicted water consumption will be low compared to the City's overall forecasted water supply that there would not result in an adverse effect on the overall water supply system. EPA believes that more discussion on this topic is necessary in order to justify the conclusion that there will be no adverse impacts. The section should define significant adverse impacts, include discussion on the sources of NYC's water, future projections for water supply and demand, the sustainability of the increase in water demand. EPA suggests that the document discuss the reason that a preliminary infrastructure analysis was not performed. If the CEQR manual indicates that an infrastructure analysis is necessary, then the results should be presented in the appendix. (5)

Response As described in **Appendix 12A** of the DEIS, incorporated within **Appendix A** of the FEIS, a preliminary assessment of water and sewer infrastructure was prepared. The analysis was prepared consistent with the guidance of the CEQR Technical Manual (2021). As described in Chapter 13 of the CEQR Technical Manual, significant adverse impacts on water supply may occur if the project would result in a water demand that would not be met by existing water supply infrastructure and that would require upgrades to the existing system. The water demand of the Proposed Project would represent approximately 0.19% of the city's average daily water supply of approximately one billion gpd. Therefore, this incremental demand would not represent an increase in water demand that would not be met by the existing water supply infrastructure and the Proposed Project would not result in a significant impact on the city's water supply system.

GHG Emissions and Climate Change

Comment Group 202 The Climate Change resiliency section should discuss how extreme temperature and weather have been considered in the design of the facility with respect to commuter experience, energy use, and structural stability. (5)

Response PANYNJ has implemented Climate Resilience Guidelines to mitigate the effects of climate change on its facilities and infrastructure, which would apply to the Replacement Facility. Details on the policy are available on line <https://www.panynj.gov/content/dam/port-authority/business-opportunities/pdf/climate-resilience.pdf> and are detailed in DEIS Appendix 10.D “Greenhouse Gases and Climate Change” found in **Appendix A** of the FEIS.

Comment Group 203 According to the DEIS, the new facility and towers will result in an incremental increase of GHG emissions of 78,452 metric tons of CO₂. Based on the EPA’s Greenhouse Gas Equivalencies Calculator, this is the equivalent of almost 19,000 gasoline-powered passenger vehicles driven for one year. Given the significant net production of GHG emissions, the GHG evaluation in the DEIS is largely qualitative, pointing out that the use of zero or low-emission electric buses is anticipated to greatly reduce the amount of GHG emissions associated with the new facility without providing a detailed quantitative analysis. While the DEIS states the New Bus Terminal would be designed, constructed, and operated to achieve at a minimum, LEED v4 Silver Certification, we urge the PANYNJ to provide more in-depth quantitative analysis of GHG emissions reductions. (21)

Response Evaluation of GHG reductions through design specifications would be evaluated by the PANYNJ prior to construction of the on-site private development.

Comment Group 204 On January 9, 2023, the CEQ published interim guidance to assist federal agencies in assessing and disclosing climate change impacts during environmental reviews. EPA recommends the DEIS apply the interim guidance as appropriate, to ensure robust consideration of potential climate impacts, mitigation, and adaptation issues. (5)

Response Thank you for your comment.

Comment Group 205 The chapter provides annualized GHG emissions for the no action and the proposed project but it is not clear for what period of time this applies. The DEIS should make clear if these are annual emissions just for the construction period or a worst-case scenario year. The DEIS should separately estimate emissions for post-construction operations. EPA suggests that the table be divided into 1) construction GHG emissions upstream & downstream until project completion (total over project construction or Annual emissions for the years 20XX-20YY) and 2) annual O&M emissions. (5)

Response GHG emissions associated with the Replacement Facility were calculated using the FTA Transit GHG Emissions Estimator Version 3 (2022). The GHG emissions are presented as an annual estimation, consistent with the FTA Transit GHG Emissions Estimator. The annual GHG emissions presented in the analysis were calculated using a 50-year analysis period for both the No Action Alternative and the Proposed Project. The tables reflect the structure of the FTA’s Transit GHG Emissions Estimator.

Comment Group 206 The DEIS states: "As described in the "Methodology" section above, construction emissions were not modeled explicitly for the private development but are estimated to be equivalent to approximately 5 to 10 years of operational emissions, including both direct energy and emissions embedded in materials (extraction, production, and transport)." The document should provide clarity on what this means. Will each year of construction of the private development will result in 5-10x the one-year estimate for operational emissions? (5)

Response The GHG emissions associated with the construction of the private development (the two proposed commercial towers) in its entirety would be equivalent to approximately 5 to 10 years of operational emissions, not one year.

Comment Group 207 The DEIS should more clearly outline impacts related to project emissions and discuss how mitigation measures could help to reduce those impacts. Additionally, the DEIS would benefit from clear commitments to methods of reducing emissions. The currently outlined methods do not provide details on construction specifications that are going to be evaluated. Further the DEIS should clarify if the methods of complying with Citywide GHG reduction goals are already included in the GHG emissions estimates. (5)

Response The analysis of GHG emissions and climate change was prepared consistent with guidance from the CEQR Technical Manual. The Proposed Project would not result in impacts related to GHG emissions and climate change; therefore, no mitigation is required. However, **Appendix B.13, "Greenhouse Gas Emissions and Climate Change,"** of the FEIS describes measures that PANYNJ would implement to reduce GHG emissions. As described in Appendix B.13, PANYNJ has also established Sustainable Building, Sustainable Infrastructure, and Clean Construction guidelines for agency undertakings, which would be applicable to the Replacement Facility.

Comment Group 208 The DEIS concludes that "Proposed Project is consistent with the applicable citywide GHG emissions reduction and climate change goals, and that there would be no significant adverse GHG emission or climate change impacts." It's not clear how this determination was made as there are no impact levels defined in this chapter. EPA recommends the DEIS explain how this determination was made including additional discussion of the analysis presented in the chapter. (5)

Response The analysis of GHG emissions and climate change was prepared consistent with guidance from the CEQR Technical Manual. As described in Section 400, Chapter 18 of the CEQR Technical Manual, "a proposed project may or may not be consistent with the City's GHG emission reduction goal and this potential inconsistency may be a significant impact." Accordingly, potential impacts related to GHG emissions and climate change are identified based on a project's consistency with the City's GHG emission reduction goal.

Comment Group 209 Section 12.5.5 shows the predicted increase in energy consumption of over 1.5 billion Btu or a 5.7-fold increase. The document states that because the predicted energy demand will be low compared to the City's overall forecasted energy consumption, that there is not expected to be significant adverse impact on energy systems. EPA believes that more discussion on this topic is necessary in order to justify the conclusion that there will be no adverse impacts. The section should define significant adverse impacts, discuss the potential impacts of an increase in energy demand, and the effect on associated infrastructure. (5)

Response Thank you for your comment. No revisions have been made.

Comment Group 210 The value for upstream annual CO₂eq from the No Action and the Proposed project are the same (109). Please ensure the CO₂eq from the manufacturing of all facility components is included in the proposed project CO₂eq estimate. It assumed that construction of a larger facility with new building materials would be associated with greater upstream emissions than the structural repair activities outlined in the no action alternative. (5)

Response As described in **Appendix B.13, “Greenhouse Gas Emissions and Climate Change”** of the FEIS, the construction emissions for the No Action Alternative and the Proposed Project were calculated using the FTA Transit GHG Emissions Estimator Version 3 (2022). As detailed in Appendix 14.A, “Construction” of the DEIS, the No Action Alternative will involve many of the same construction materials and activities as would the Proposed Project, but at a smaller scale and could be expected to have similar upstream emissions in the manufacture of construction materials, on a per unit basis.

Comment Group 211 When describing the increase in GHG emissions for the Project Alternative, it is not clear if emissions will change throughout the construction of the project. Currently, it states that emissions will be the same for each year, whereas Chapter 10 “Air Quality” shows fluctuating emissions during various periods in the project (2028 being the “worst”). EPA suggests a further breakdown and explanation of GHG emissions in the No Action Alternative and Project Alternative, with emphasis on what GHG emissions look like before any action is taken, what they will look like in various points throughout the project, how they will change at the conclusion of the project, and the long-term operation and maintenance emissions. (5)

Response GHG emissions associated with the construction of the Replacement Facility were calculated using the FTA Transit GHG Emissions Estimator Version 3 (2022). The GHG emissions are presented as an annual estimation, consistent with the FTA Transit GHG Emissions Estimator.

Comment Group 212 To further evaluate project-related benefits, EPA recommends including a BCA utilizing the Social Cost of Greenhouse Gases (SC-GHG). Estimates of the SC-GHG allows for an assessment in the societal value of changes in CO₂ and other GHG emissions of actions that have small, or marginal, impacts on cumulative global emissions. (5)

Response Thank you for your comment. PANYNJ has prepared an additional evaluation of the Social Cost of Greenhouse Gas Emissions, which can be found in **Appendix B.13, “Greenhouse Gas Emissions and Climate Change”** of the FEIS. PANYNJ anticipates that the Replacement Facility would comply with a net-zero vision, as part of the PANYNJ’s Net Zero Roadmap announced in 2021. The Replacement Facility would be designed to achieve a minimum of a LEED Silver rating and an Envision Gold rating is anticipated to be pursued for the components of the Proposed Project that are subject to PANYNJ’s Sustainable Infrastructure Guidelines, including the Dyer Deck-Overs.

Comment Group 213 The Port Authority Bus Terminal Project EIS should describe the contribution of Port Authority Replacement Terminal bus fleet to climate change. Climate change is contributing to amphibian population declines and extinctions. A separate climate change chapter that describes the affected climate change environment and project climate change effects should be included in the EIS. A discussion of the eventual shift of the bus fleet to electric-powered buses and the potential to reduce GHG emissions should also be included in the EIS. (24)

Response The PANYNJ does not operate bus services. The Replacement Facility is being designed to accommodate future fleet configurations as projected by transit operators and the bus industry; this includes providing infrastructure to support EV bus charging.

Environmental Justice

Comment Group 214 The CEQ, which oversees implementation of NEPA, has promulgated a guidance document to assist agencies in implementing environmental justice principles (see Environmental Justice Guidance under NEPA, CEQ, December 10, 1997). EPA recognizes that this definition is based on a USDOT Order, however, EPA strongly recommends FTA consider existing burdens of nearby communities, as discussed in the following comment, in order to not overlook impacts which may impact sensitive populations differently or more severely than the general population. The CEQ guidance Promising Practices for EJ Methodologies in NEPA Reviews states “Agencies may wish to recognize that in instances where an impact from the proposed project initially appears to be identical to both the affected general population and the affected minority populations and low-income populations, there may be inter-related ecological, aesthetic, historic, cultural, economic, social, or health factors that amplify the impact (e.g., unique exposure pathways, social determinants of health, community cohesion). After consideration of factors that can amplify an impact to minority populations and low-income populations in the affected environment, an agency may determine the impact to be disproportionately high and adverse.” Of the 39 block groups around the product area analyzed, 30 were identified as above the threshold for low-income populations, minority populations, or both. As stated above, many factors may increase the impact experienced by sensitive groups. EPA strongly recommends FTA reconsider how disproportionate impacts are analyzed in the DEIS and that the main body of the DEIS include a discussion on the factors that can amplify identified impacts (e.g., the unique exposure pathways, prior exposures, social determinants of health) to ensure a comprehensive review of potential disproportionate and adverse impacts to minority populations and low-income populations. (5) Given the distribution of communities with EJ concerns within the regional study area, the implications of the Proposed Project could result in an increased cumulative burden experienced by the community. The DEIS would benefit from a baseline description of current existing stressors/pollution burden within these communities to better assess cumulative effects. EPA encourages the use of EJScreen when conducting EJ scoping efforts. This tool is a useful first step in highlighting locations that may be candidates for further analysis. As a general guidance for the purposes of a NEPA review, a project is considered to be in an area of potential EJ concern when the area shows one or more of the thirteen EJ Indexes at or above the 80th percentile in the nation and/or state. However, scores under the 80th percentile should not be interpreted to mean there are definitively no EJ concerns present. The DEIS should consider the existing burdens of nearby receptors in its evaluation of impacts as well as necessary mitigation. (5)

Response Thank you for your comment. Please see **Appendix B.12, “Environmental Justice,”** of this FEIS for updates to material initially presented in the DEIS. The revised appendix now includes additional information evaluating existing health and pollution burdens experienced in the study area. Additionally, material describing adaptive management techniques PANYNJ would implement in response to monitored conditions during construction, and extensive community engagement processes were incorporated into the update.

Comment Group 215 Additionally, per EO 13045 on Children’s Health, EPA recommends that FTA consider impacts to places where children live, learn, and play, such as homes, schools, and playgrounds. The FEIS documents should identify proximity to sensitive receptors and should implement mitigation measures near these locations in order to be protective of children’s health. (5)

Response As described in Appendix 3B, “Community Facilities” of the DEIS, (see **Appendix A** of the FEIS) the Proposed Project would not result in direct or indirect impacts to public or publicly funded schools or publicly funded early childhood programs. As described in **Appendix B.7. “Construction,”** of the FEIS, construction activities associated with the Proposed Project would not

result in adverse air quality or noise impacts to schools, early childhood programs, or playgrounds. Noise generated by construction of the Proposed Project would have the potential to impact residences temporarily during construction; however, many of these residences are in buildings of relatively recent construction that have insulated glass windows and central air conditioning (i.e., an alternate means of ventilation). As one potential mitigation measure that could be applied for the potential construction noise effects at buildings that do not have insulated glass windows and alternate means of ventilation, storm windows and window air conditioning units could be offered to building owners. These measures would improve the window/wall attenuation provided by the building facade and allow for the maintenance of a closed-window condition.

Comment Group 216 The DEIS states that "Offsetting benefits and mitigation measures are taken into consideration when determining whether a project has disproportionately high and adverse effects on environmental justice populations." The DEIS lists several benefits that can be expected as a result of the proposed project. It is helpful to include these benefits in the DEIS as part of the analysis they should be stated separately and should not be used to offset impacts. The DEIS should clearly identify the impacts of the proposed alternatives and separately identify mitigation measures which may be implemented to address those impacts. (5)

Response Thank you for your comment.

Comment Group 217 Noise and vibration effects on communities with EJ concerns: Noise pollution has been directly linked to health effects. Problems related to noise include stress-related illnesses, high blood pressure, speech interference, hearing loss, sleep disruption, and lost productivity (EPA's Noise Effects Handbook, 1991). As this is an area with already high levels of traffic, minor to moderate increases in noise from the proposed project should still be considered as impacts. EPA suggests that the project sponsors include in a Public Involvement Plan a way for nearby residents/community members to report any concerns regarding increases in noise and provide possible mitigation measures including potentially additional monitoring. (5)

Response A PIP has been prepared and was included in Chapter 16 of the DEIS. The PANYNJ commits to continuing a robust communication effort with community residents, businesses, commuters and stakeholders as the project advances, including a platform to identify issues of concern and receive timely information on construction activities. The PANYNJ will monitor noise levels during construction and respond as appropriate should noise levels unexpectedly exceed thresholds. The PANYNJ will continue collaborating with all community members around the construction process and is committed to providing regular updates.

MITIGATION

Comment Group 218 Given the above facts and concerns, MCB4 will propose a series of mitigation measures both for significant impacts and impacts the DEIS says cannot be mitigated. These measures are listed at the end of the document. We look forward to resolving these complicated challenges jointly with the Port Authority team provided that: 1. The many remaining issues listed by MCB4 are addressed and memorialized in the Zoning Text amendments; and, 2. Extensive proposed mitigation is provided in this document, including some immediate relief (to be incorporated in Points of Agreement with the City). (15)

Response Thank you for your comment

Comment Group 219 This mitigation chapter lacks specific details for the mitigation measures selected, or the methodologies used for the selection of the mitigation option. The specific details should be listed for each mitigation option chosen or considered and information which supports the choice for that measure should also be included. (5)

Response Please see the updated descriptions of mitigation measures throughout the FEIS, including **Appendix B.8 “Mitigation.”** The PANYNJ has provided an extensive set of specific steps and measures it will or would take to avoid, minimize or mitigate and potential adverse effects resulting from the Proposed Project. For several technical areas where analysis showed the potential for impacts to occur, the impact would not occur until at least fifteen years after the publication of this EIS, making overly specific mitigation commitments unrealistic and even potentially unhelpful. Instead PANYNJ has made commitments to a process which would assess conditions following completion of the Replacement Facility, and develop effective and responsive mitigation measures as appropriate

Comment Group 220 To the extent possible, the mitigation measures should be quantified to demonstrate the reduction of impacts in connection with proposed mitigation measures. (5)

Response Thank you for your comment. Technical analyses evaluating impacts, whenever possible, have sought to show revised conditions, in terms of LOS, travel times or potential reductions in noise levels, as a result of potential mitigation measures. As detailed in the **Appendix B.8 “Mitigation”** PANYNJ will be monitoring conditions during construction (including air quality, noise levels, vibrations, and through the traffic management center, traffic) and responding to address conditions which may be approaching levels which could result in impacts, as practicable and feasible. This fact, however, may make specific mitigation efforts, or the measurements of their results, difficult to accurately measure or predict. In operational conditions, impacts are quantified, but it may not be possible to quantify specific results of mitigation. For example, in response to shadow impacts on sunlight sensitive resources, the FTA and PANYNJ have committed to a process to assess the affected properties and develop potential mitigation solutions (including artificial lighting or removal of any obscuring window treatments) but until those measures are developed and confirmed, it would not be able to quantify the reduction.

Comment Group 221 Pedestrian Impact Mitigation – The City would like to coordinate further with the Port on the feasibility of the proposed mitigations for identified pedestrian impacts because there may be more mitigation with regard to pedestrian impacts as a result of further analysis (see comment above) and mitigation will require significantly more capital planning. (11) MCB4 considers the proposed mitigation not to be commensurate with the overwhelming impact of this proposed project. Mitigation is needed both during the ten years of construction and after the permanent infrastructure improvements of the Main Bus Terminal, Staging and Storage Facility, and ramps are completed. MCB4 therefore proposes an initial list of mitigation and community benefits to address both the construction and unmitigated negative impacts identified in the DEIS. (15) We appreciate that the PANYNJ proposes creating a park space above the terminal’s storage and staging area, but we do not agree that views of the McGraw Hill Building created from this space can be considered mitigation for lost views of the building from the street and public right of way, because it is unclear to us how and when the public will be able to access the proposed new park space. (26)

Response The EIS identifies adverse impacts that are anticipated to result from the Proposed Project. Whenever possible, the EIS has proposed specific mitigation measures to address these, including: adjustments to signal timing (traffic), use of widened sidewalk areas or removal of

sidewalk obstructions (pedestrian), or processes to improve or artificially replicate sunlight in a historic property (shadows).

The EIS has sought to establish clear areas where the PANYNJ is committed to mitigating any adverse impacts to the extent practicable. However, given the unique aspect of this project – the EIS evaluation is taking more than eight years before the Replacement Facility will be completed and operational, and at least 16 years before the Proposed Project is finished, future travel conditions are reached (2040 levels of bus demand) and retail and commercial towers are occupied, with innumerable unknowns and variables certain to take place over that ensuing period of time. As detailed in the FEIS **Appendix B.8 “Mitigation”** the FTA and the PANYNJ are committing to reanalyzing conditions at the conclusion of the Replacement Facility to establish a new baseline which to compare future conditions against and determine the need and method of any specific mitigation measures.

Comment Group 222 Table 6B-4 lists four historic resources. Three of these historic resources are historic churches with stained glass windows. Holy Cross and St. Raphael’s are landmark eligible. The McGraw Hill Building is a landmark. The DEIS notes that sunlight sensitive features in Holy Cross, St. Raphael’s and Metro Baptist Churches will all be diminished. Mitigation beyond lighting and stained-glass windows must be considered and agreed to. (15) Metro is open to exploring potential mitigation measures. However, it should be noted that all of the west facing windows, exterior and the roof will be subject to significant adverse impacts. Will measures to mitigate the loss of natural light enjoyed by the tenants and programs include all floors and roof of the building? (32)

Response **Appendix B.2.2** of the FEIS contains the final Programmatic Agreement, which contains stipulations related to the measures to avoid, minimize, or mitigate adverse shadow effects to historic resources. As described in the final Programmatic Agreement, mutually agreed upon measures would be developed to offset the shadows impacts associated with the Proposed Project. Measures to be explored include cleaning of the interior/ exterior of the affected sunlight sensitive windows or of any protective covering (if present); replacement of any protective covering (if present) with a more translucent material; installation of artificial lighting, or other mutually agreed-to measures developed through consultation. The adverse shadow impacts associated with the Proposed Project are limited to the sunlight-sensitive features of the historic properties, which is limited to stained glass windows for the religious facilities.

Comment Group 223 In discussing potential mitigation measures to address visual impacts due to shadows, the DEIS states "mutually agreed-upon measures to improve the clarity of the sunlight and ambient light reaching the interior". Additional information, including the parties that would determine such measures, should be provided in Section 2D.4. (5)

Response **Appendix B.2.2** of the FEIS contains the final Programmatic Agreement, which contains stipulations related to the measures to avoid, minimize, or mitigate adverse shadow effects to historic resources. As described in the final Programmatic Agreement, upon request to, and approval by FTA and PANYNJ, and consent of participating property owners, NYSHPO, NY Landmarks Conservancy or other Concurring Parties may participate in the consultation directly with property owners. Mutually agreed upon measures would be developed to offset the shadows impacts associated with the Proposed Project. Measures to be explored include cleaning of the interior/ exterior of the affected sunlight sensitive windows or of any protective covering (if present); replacement of any protective covering (if present) with a more translucent material; installation of artificial lighting, or other mutually agreed-to measures developed through consultation.

Comment Group 224 Like much of the language in the proposed Programmatic Agreement, we find the sections addressing shadow mitigation for the Metropolitan Baptist, Holy Cross, and St. Raphael Churches to be too vague. Our organization's extensive experience with houses of worship has shown us that congregations rarely have the resources or expertise to evaluate options for illuminating stained glass windows. We recommend that the language in the PA explain how the mitigation efforts at the churches will be planned and implemented. (33)

Response Please see **Appendix B.2.2** of this FEIS for the Final Programmatic Agreement, detailing the commitments and process for identifying, assessing and implementing shadow mitigation measures for the affected historic properties. The potential mitigation measures are intentionally open-ended to allow for site-specific information to be gathered, options tailored to the facility / congregation and assessed for benefit, cost and feasibility.

Comment Group 225 We welcome changes to the new terminal's mechanical penthouse that would reduce its size or eliminate it completely. The potential bulk and proximity of the two towers to the McGraw Hill building is problematic. We must see further significant mitigation strategies applied to their design to reduce their adverse impacts. Relocation of the towers, as well as significant setbacks, canted corners, or other design solutions, must be considered. Design guidelines should be provided to the architects and must be enforceable as the project is refined and further developed. (33)

Response As extensively detailed in the FEIS **Appendix B.2.1, "Historic and Cultural Resources, Agency Correspondence."** the FTA and the PANYNJ reviewed multiple options to avoid, minimize or reduce impacts to the McGraw-Hill Building as a result of the proposed project. In addition to the removal of the mechanical penthouse from the roof of the new Main Terminal, the partial closure of West 41st Street (west of Eighth Avenue) allowed Tower 2 to shift from the west side of the Main Terminal to the east (along Eighth Avenue) reducing project-generated shadows on the McGraw-Hill Building in the afternoon.

As detailed in **Appendix B.2.2** of the Final Programmatic Agreement of this FEIS, the FTA and the PANYNJ have committed to a design review process where the opportunities to reduce effects (shadow, view obstruction) from the Main Terminal and private development (the two proposed commercial towers) will be considered, as appropriate.

Comment Group 226 MAS is concerned about the removal and/or obscuring of historic resources, including the Art Deco lighting towers at the Lincoln Tunnel north tube entry portal, and the brick wall. We support the idea of creating a permanent interpretive display documenting the history and significance of the Lincoln Tunnel and other historic resources in the area as an additional measure, not a replacement for salvaging and reusing historic materials. Recommendations: Every effort must be made to salvage, restore, and reinstall historic resources within the new project, including the Lincoln Tunnel north tube entrance portal lighting towers. A permanent interpretive display documenting the history and significance of the Lincoln Tunnel and other historic resources in the area must be incorporated into the new Port Authority terminal, not delayed for a future open space design. (21) We appreciate that PANYNJ has taken steps to lower the height of the new terminal by relocating its mechanical penthouse, and to preserve sightlines to the McGraw Hill Building from the west by moving one of the proposed private development towers from 9th to 8th Avenue. We believe these are both positive steps towards mitigating this project's impact on adjacent historic resources,

most notably the McGraw Hill Building, but we believe that greater mitigation remains necessary, and further strategies must be employed. (26)

Response The interpretative display for any salvaged, restored and reinstalled elements of the Lincoln Tunnel, or informational displays, will be developed and implemented as outlined in the Final Programmatic Agreement (see **Appendix B.2.2 'Programmatic Agreement'**). The process identified there creates a group of Concurring Parties that will review an Interpretative Display Plan to be developed, which will include the display material, content and location. While the PANYNJ agrees with your sentiments about the historic importance of the Lincoln Tunnel, we cannot commitment to specifics around location or timing of the implementation of Interpretative Display material in advance of the identified process.

Comment Group 227 NYC Parks Department has jurisdiction over any trees that are impacted by construction. As a small part of mitigating this intense, long term construction project, the Port Authority should engage in a street tree planting program throughout the impacted area. One example is the south side of West 39th street between 9th and 10th Avenue, a street that currently has no trees and almost entirely fronts Port-owned property that will not be impacted by this project. (27)

Response The PANYNJ is not contemplating undertaking discretionary, area-wide sidewalk improvements outside of its jurisdiction as part of the Proposed Project.

Comment Group 228 MTA's comments on the DEIS address two primary concerns: 1) impacts to bus and subway operations and our customers during project construction, and 2) necessary mitigation and enhancements to assure a high quality of service for MTA and Port Authority customers upon completion of the new bus terminal and the associated towers. According to the PABTR DEIS, by 2040 the proposed office and retail space would be expected to generate another 11,600 person trips in both the AM and PM peak hours, adding more than 6,100 trips to the subway system and 1,700 trips to MTA/NYCT's bus network during the AM peak hour, and more than 5,600 subway trips and 1,600 bus trips during the PM peak hour. The significant adverse impacts to subway elements in both the 8th Avenue 42nd Street/Port Authority Bus Terminal station and the Times Square subway station complex, disclosed in the PABTR DEIS, must be mitigated by the Port Authority prior to the opening of the proposed overbuild towers. These include multiple stairways both from street-level to mezzanine and from mezzanine to platform-level. In addition, it is expected the Port Authority will take a holistic approach to the design and construction of the new interfaces between the reconstructed PABT and MTA/NYCT subway stations to create a unified customer experience. Finally, given that developments of this size in commercial areas typically provide circulation or accessibility improvements to surrounding subways and their access points, we look forward to continuing the discussion about possible improvements or necessary mitigations to the 42 St – PABT and Times Square stations as the project planning continues. (12) The project would have the potential to result in impacts to 12 subway stairwells and one fare array at the West 42nd Street Port Authority Bus Terminal subway station, accessed via the northwest corner of Eighth Avenue and West 42nd Street. And the number of stairs operating at LOS F at Times Square Station increases from four to five. No mitigation is proposed for these. We recommend that improved crosstown M42 bus service be explored as well as renovation of all the entrances to the 42nd Street

PABT subway concourse (West 43rd, West 42nd, four entrances at West 41st). Adding an elevator at the West 43rd Street entrance would be helpful to the Manhattan Plaza population. (15)

Response PANYNJ undertook the PABT redevelopment to accommodate forecasted growth in bus ridership which is expected to occur regardless of the Proposed Project; the Replacement Facility will not induce demand. General growth within the city by 2040 – absent any specific project or improvement (inclusive of the PABT) - may result in congestion at three adjacent MTA subway stairs. While the on-site private development that is part of the Proposed Project would generate new pedestrians and transit riders, it should not be viewed or evaluated in the same manner as a typical private development (such as One Vanderbilt) which was constructed for private use and profit. The towers above the PABT should not be considered equivalent to a “typical” commercial development; instead, they are a critical component of the Proposed Project, with the sole purpose of providing necessary funding that allows the public transit investment to be made, and have been incorporated into the terminal redevelopment by the sponsoring public agency (the PANYNJ).

The EIS analysis generated estimates of person trips based on conservative conditions; while appropriate for environmental review purposes, the actual size and timing of the on-site private development, and thus the number of trips generated, will be driven by market conditions. As stated in FEIS **Appendix B.8 “Mitigation”** the PANYNJ is committed to providing improvements during construction, and will study pedestrian and transit conditions starting in 2032 when the Replacement Facility is completed and operational. This will provide the most current and accurate information – including any changes in travel or transit ridership patterns (particularly important given the current uncertainty around the introduction of the MTA’s congestion pricing program) or significant development projects in the area – to be included.

Comment Group 229 After the intersection count requiring mitigation is corrected, the proposed mitigations will not be adequate for such cumulative impacts. MCB4 recommends that: That the Dyer Avenue northbound lane between West 34 and W 37 be closed and more green space be provided. That the Port Authority make a commitment to dedicate 20 traffic managers to permanently manage the anticipated gridlock. That green light signals be adjusted to prevent congestion. (15)

Response The PANYNJ has made commitments to assess traffic conditions following completion of the Replacement Facility and determine, where appropriate, mitigation measures necessary to address impacts attributable to the Proposed Project. Mitigation measures would be developed in coordination with NYC DOT. The PANYNJ will not make any commitments to permanently provide traffic managers. Adjustments to signal timing are a frequently applied mitigation measure and would be considered for any future traffic conditions requiring mitigation.

Comment Group 230 The DEIS should quantify how potential mitigation measures might improve travel times for particular locations (pg. 14-12). The document should refer in this section to where in the mitigation measures are listed. (5)

Response As shown in **Appendix B.7** of the FEIS, construction traffic analysis determined that as a result of additional construction trips added in the peak year of Phase 2 construction (when the highest number of both construction workers and construction deliveries would be expected on the project site) two intersections, Ninth Avenue at 40th Street and Tenth Avenue at 41st Street, would be impacted in the mid-day period. Adjustments to signal timing were able to show the potential to mitigate impacts at one intersection. PANYNJ intends to make all practicable efforts to mitigate any traffic conditions which may result during changes to area streets required for construction activities. Traffic mitigations that were evaluated included adjustments to signal-timing, parking restrictions or removals, limiting turning movements to reduce traffic conflicts, and restricting

specific streets to limited vehicles (*e.g.*, construction, bus, or emergency access only). PANYNJ will consider the most effective deployment of PAPD officers, Traffic Enforcement Agents, pedestrian-managers (crossing guards), and construction flag people to manage safety and minimize traffic delays. Mitigation measures are described **Appendix B.8 “Mitigation,”** of the FEIS..

Comment Group 231 The base traffic model vastly underestimates the current congestion. There are 63 of intersections needing mitigation. Therefore, this portion of Hell’s Kitchen will be facing an epic gridlock pattern for ten years. To address such an extraordinary situation, we ask that more regional comprehensive traffic measures be considered, such as closing certain access to the Lincoln Tunnel and diverting its traffic to less congested alternate avenues or crossings and emphasizing use of transit or high occupancy modes. (15)

Response As detailed in **Appendix B.4.2 “Traffic”** the PANYNJ collected traffic counts on multiple occasions in close coordination with NYC DOT. Initial traffic counts were conducted in 2018 and again in 2021 and 2023. Counts were conducted using automated traffic recorders and were supplemented with information from other environmental reviews with similar traffic study areas, as well as information from NYC DOT’s Traffic Information Management System. Data collected is able to measure traffic volumes, turning movements, as well as disaggregate general traffic by vehicle type (motorcycles, cars, light goods vehicles, buses or other larger vehicles). The Port Authority Bus Terminal Replacement Project is not intended to address regional vehicular movements but is a critical part of addressing overall transit capacity for trans-Hudson trips. The PANYNJ will continue collaboration with local stakeholders and agency partners in developing improvements which may address existing congestion unassociated with the Proposed Project.

Comment Group 232 As stated on Page 15 of Chapter 14 of the DEIS, significant impacts would occur on nine sections of sidewalks, at 34 crosswalks, and at seven sidewalk corners. Please Study: The impacts for pedestrian flow during construction as well as after the completion of the project will be substantial. The DEIS has drastically underestimated the degree of mitigation needed to manage pedestrian flows. Sidewalk widening and removing barriers to pedestrian circulation should be coupled with pedestrian managers at high volume intersections. Pedestrian managers are a much more flexible effective approach. (15)

Response As described and analyzed in **Appendix B.7** of the FEIS, while the SSF is operating as an interim terminal, a designated pedestrian walkway would be provided at-grade along the north side of West 40th Street, between Ninth and Eighth Avenues. During peak commuting times, the pedestrian walkway would expand to occupy the center lane within West 40th Street. Outside of peak commuting times, the pedestrian walkway would be maintained and West 40th Street would be configured to accommodate vehicular traffic and a loading zone. PANYNJ will consider the most effective deployment of PAPD officers, Traffic Enforcement Agents, pedestrian-managers (crossing guards), and construction flag people to manage safety and minimize traffic delays. PANYNJ has initiated advance planning for construction activities (including deliveries MPT plans, detours and street / roadway closures) via a Transportation Management Plan (TMP). For each phase of construction, MPT plans would be developed to ensure the safety of pedestrian, bicyclist, and vehicle circulation near the project area. MPT plans would be coordinated with NYC DOT and would ensure construction activities would minimize potential effects to businesses. The TMP aligns potential construction activities associated with the Proposed Project and other major construction efforts which may require coordination around regional infrastructure (*i.e.* – major Hudson River crossings) or local streets. The TMP also provides operational plans, best practices for deliveries, along with other projections about vehicle and transit conditions which either must be maintained or accommodated during construction. The TMP would then inform a Traffic Management Center

(TMC) that the PANYNJ plans to establish for construction coordination. The TMC will receive real-time information about construction activities, transit operations and general traffic, and be able to transmit advisories for the PANYNJ, its contractors, transit operators, bus passengers or the general public (who may be passing through the area) across a variety of media platforms. The TMP and TMC are specifically intended to respond to the unforeseen conditions that are likely to arise on construction projects of this scale, identifying issues and potential solutions, as far in advance as possible.

Comment Group 233 The businesses listed below will be affected by terminal construction. These businesses are located on the west side of Ninth Avenue adjacent to the terminal construction 2028-2032. These historic affordable businesses, which have offerings unique to the area, are unusually important because their products or services, are subject of policies aimed at their preservation, and they serve a population uniquely dependent on its services in its present location. They will be engulfed in the construction and, as we have learned from the Second Avenue subway construction, their existence will be threatened. Many of their customers are low-income and come from the northern half of the neighborhood where there is a large concentration of seniors who live in poverty. Please confirm that these businesses will be included in the planning for interim retail operations and that a financial plan will be put in place to keep them operating and maintain access for their customers. The DEIS notes that the proposed project would not affect access to services or result in disruption of business activities in the study area. However, the report also recognized through its studies that there are several homeless shelters and social service facilities in the area and that small businesses will be displaced. Please ensure communication with all affected facilities in an accurate and consistent manner and ensure that mitigative solutions are put in place. (15) Finally, please describe the process for determining if, and when compensation will be provided to residential and/or commercial tenants for all items listed above, particularly for disruptions to business operations and lost revenue. (23)

Response As described in Chapter 4 and Appendix 4A of the DEIS, incorporated within **Appendix A** of the FEIS, the Proposed Project would result in the displacement of approximately 23 businesses and 244 workers associated with those businesses, entirely within the existing PABT, as a result of the closing and demolition of the existing PABT. The Proposed Project would not result in indirect business displacement, direct or indirect residential displacement, or adverse effects to specific industries. Accordingly, no mitigation would be required with respect to socioeconomic conditions. PANYNJ would coordinate with businesses within the existing PABT, it is possible that some of these businesses may be relocated to the SSF during construction and then relocated back to the new Main Terminal following its completion.

PANYNJ is committed to inclusion of Minority and Women-owned Businesses in its procurement of construction contracts and would comply with the Disadvantaged Business Enterprise program. For each phase of construction, MPT plans would be developed to ensure the safety of pedestrian, bicyclist, and vehicle circulation near the project area. MPT plans would be coordinated with NYC DOT and would ensure construction activities would minimize potential effects to businesses. PANYNJ would coordinate with social services organizations to assist unhoused populations that may be displaced by the closure and demolition of the existing PABT. PANYNJ would continue to provide outreach and referral services to individuals experiencing homelessness at the PABT or within the project area. PANYNJ would continue to provide access to detox programs, shelters, drop-in centers, and travel assistance in specific case needs.

Comment Group 234 The impact of the construction on the quality of life for myself, my family, and my neighbors will be devastating. To be expected to endure another ten years of even more excessive

construction noise, more traffic congestion, and poor quality air is not acceptable. The Port Authority needs to find ways of vastly minimizing the impact of this project on our community before beginning construction. (39) The construction of this project will be an enormous, long (and permanent) hardship for the whole community of which I and my family are longtime residents. We absolutely need mitigation for noise and pollution caused by both construction and the additional traffic it will cause. The Port Authority needs to find concrete ways to address this, either by rethinking the work schedule to avoid noise at night, close the area to traffic completely, provide soundproof windows to residents, require the noise levels to be kept at or below the allowed level, etc. We hope this will be effectively addressed. (111)

Response As described in **Appendix B.7** of the FEIS, construction of the Proposed Project would typically occur during weekday the daytime and into the evening hours.. Intermittent overnight work would occur over the course of approximately one year, limiting the noise produced during nighttime hours when residents would be most sensitive to noise. Additionally, construction in each work area would occur over a limited period of several months and resulting noise impacts would therefore be considered temporary and transient. Construction of the Proposed Project would b adhere to the requirements of the New York City Noise Control Code for construction noise control measures and would incorporate some noise control measure that go beyond those required by the Code. As mitigation for the potential construction noise effects at buildings that do not have insulated glass windows and alternate means of ventilation, storm windows or window air conditioning units would be offered to building owners. These measures would improve the window/wall attenuation provided by the building façade and allow for the maintenance of a closed-window condition. Consequently, interior noise levels at these receptors would be reduced by approximately 30 dBA, resulting in interior noise levels no more than approximately 9 dBA above the 45 dBA acceptable threshold for residential use referenced in the FTA guidance manual.

The construction air quality analysis determined that the maximum predicted total concentrations of 1-hour and 8-hour average CO, annual average NO₂, 24-hour average PM₁₀, and 24-hour and annual average PM_{2.5} would all be below the applicable NAAQS. Therefore, construction of the Proposed Project would not result in a significant adverse construction air quality impact. In addition, PANYNJ would require construction efforts to adhere to regulatory or self-adopted mandates for emission control measures, including ultra-low sulfur diesel fuel, dust control measures, idling restrictions, and filtration of tailpipe exhaust for non-road diesel vehicles with 50 or more horsepower.

PANYNJ has initiated advance planning for construction activities (including deliveries MPT plans, detours and street / roadway closures) via a Transportation Management Plan (TMP). For each phase of construction, MPT plans would be developed to ensure the safety of pedestrian, bicyclist, and vehicle circulation near the project area. MPT plans would be coordinated with NYC DOT and would ensure construction activities would minimize potential effects to businesses. The TMP aligns potential construction activities associated with the Proposed Project and other major construction efforts which may require coordination around regional infrastructure (*i.e.* – major Hudson River crossings) or local streets. The TMP also provides operational plans, best practices for deliveries, along with other projections about vehicle and transit conditions which either must be maintained or accommodated during construction. The TMP would then inform a Traffic Management Center (TMC) that the PANYNJ plans to establish for construction coordination. The TMC will receive real-time information about construction activities, transit operations and general traffic, and be able to transmit advisories for the PANYNJ, its contractors, transit operators, bus passengers or the general public (who may be passing through the area) across a variety of media platforms. The TMP and TMC are specifically intended to respond to the unforeseen conditions that are likely to arise on

construction projects of this scale, identifying issues and potential solutions, as far in advance as possible.

Comment Group 235 Relocation of curbs and building lines as mitigation measures are drastic, are these feasible? How would this be accomplished in a short timeframe, if at all? (27) I would like to know what kind of mitigation is going on here. Whether there might be a real estate tax mitigation or moratorium for the people who are in the thick of it while this is going on. (61) I want to know what provisions will be made to local residents, especially those living at the epicenter of the proposed Hellscape. (104) The temporary storage unit is going to be happening yards away from our building and I am concerned about the structural damage it can cause to the buildings that surrounding the construction area. Has the Port Authority thought of this, to put in place for any contingency of damage to the buildings surrounding the construction site? Our building, like many of the buildings in the immediate area, is well over 100 years old. We are worried that the vibrations from heavy duty construction—excavation, truck traffic, jackhammers, etc.— will damage our physical structure. Suspend property taxes for affected buildings for the duration of the project. Tax givebacks are common for developers; the city should compensate property owners in the middle of this undertaking as well. (109)

Response Relocation of curbs are a routine construction activity throughout the city. As a mitigation measure, adjusting building lines is assumed to be practicable and feasible generally only when the project is an early design phase and can setback the building wall from the edge of the property line (as has been done on the sidewalks immediately adjacent to the new Main Terminal in the Proposed Project).

The PANYNJ, which has no control over City real estate taxes, does not plan any compensation for residents or businesses as a result of disruption or inconvenience from construction of the Proposed Project.

To avoid the potential for vibration-induced damage on architectural resources located close enough to the project construction (within 20 feet), the Proposed Project would develop and implement a Monitoring Plan. The Monitoring Plan would include a requirement for monitoring of vibration levels at any structures within 20 feet of active subsurface construction or any historic structure within 90 feet of active subsurface construction, as well as a prohibition on vibration exceeding the acceptable threshold. If construction were to result in vibration exceeding this threshold, the Monitoring Plan would require construction means and methods to be altered to avoid producing such exceedances.

Comment Group 236 Appendix 3B – Social Services (p. 3B-9). Please Correct: “the Proposed Project would not displace or otherwise directly affect any publicly funded early childhood programs. Therefore, no further analysis is warranted, and the Proposed Project would not be anticipated to result in significant adverse impacts to community facilities.” This is inaccurate. In fact, the construction will directly affect the Head start [sic] program at Metro Baptist Church due to the noise created by both the demolition and construction of both the ramps and the Storage and Staging Facility. This construction noise will require mitigation. (15)

Response As described in **Appendix B.7** of the FEIS, the Metro Baptist Church was a modeled receptor for the construction noise analysis (receptor location 42). The construction noise analysis determined construction activities associated with the Proposed Project would not result in noise impacts to the Metro Baptist Church. Accordingly, no noise mitigation would be required, and construction noise would not adversely impact the Head Start program at the Metro Baptist Church. In addition, the Proposed Project would not result in a physical alteration of the Metro Baptist

Church, and the Head Start program would not be directly or indirectly displaced as a result of the Proposed Project.

Comment Group 237 Further, the mitigation chapter states that “air conditioner units could be offered to building owners.” This mitigation would result in interior noise levels that are still “9 dBA above the 45 dBA acceptable threshold for residential use referenced in the FTA guidance manual.” The DEIS should discuss how the nearby community would be made aware of this mitigation effort and how the units would be provided to impacted residents. The FTA should consider whether this mitigation is sufficient as the noise levels are still in exceedance of applicable criteria and it is not clear how the mitigation would be effectively implemented. (5) Night work — consider ways to mitigate noise and the impact of construction lighting on residences. (15)

Response Construction of the Proposed Project would typically occur during weekday daytime hours with intermittent nighttime work over the course of approximately one year, limiting the noise produced during nighttime hours when residents would be most sensitive to noise. Additionally, construction in each work area would occur over limited periods and resulting noise impacts would therefore be considered temporary and transient. The PANYNJ will engage a community liaison before construction commences who will undertake extensive community engagement and a robust information campaign to ensure that residents are aware of the construction activities and if they are within a property that is eligible for mitigation measures.

Comment Group 238 The adverse effect of the introduction of new visual elements (new terminal and commercial towers) within the viewshed of McGraw-Hill Building NHL compels avoidance and minimization of the adverse effect. As part of the mitigation, a design working group must be established with NPS and the NYSHPO, as well as other subject matter experts. This design group will review and discuss the proposed terminal design, as well as designs for the proposed commercial towers. (10)

Response As described in FEIS **Appendix B.2.2, “Final Programmatic Agreement”** contains stipulations related to design consultation. FTA, in coordination with PANYNJ, will consult with the McGraw-Hill Building property owners, NYSHPO, NYCLPC, and NPS on the design of the proposed Main Terminal and on-site commercial towers. FTA will consider comments furthering avoidance, minimization, or mitigation of adverse effects to the McGraw-Hill Building, as identified in the Programmatic Agreement. Design consultation would occur, at a minimum, at three design phases; the preliminary (30% level of Project design), and pre-final (60% and 90%) phases. As part of the Programmatic Agreement, PANYNJ would prepare a Historic American Buildings Survey photographic recordation of the exterior of the McGraw-Hill Building, consistent with NPS guidelines. In addition, PANYNJ will develop an interpretive display with the goal of documenting the history and significance of the McGraw-Hill Building, making the information available to the public. Separately, PANYNJ has implemented multiple design modifications and updates since commencing initial design which reduced incremental shadows reaching the facades of the McGraw-Hill Building (two private development towers, 3 and 4 were removed from the program, and Tower 2 was relocated from Ninth Avenue to Eighth Avenue).

Comment Group 239 A lack of action would continue to foment environmental injustices in the area. We agree with the assertions in Chapter 5 that, “construction impacts, diminished economic benefits, and severe disruption to bus operations and diversion to curbside locations would affect environmental justice populations.” We also appreciate that the effects of disruption to intercity bus service on environmental justice communities were considered in this DEIS. Many passengers of our

and our peers' service are members of environmental justice communities. Members of EJ communities deserve a solution that prioritizes their needs. (30)

Response The EIS determined the Proposed Project would not result in disproportionately high and adverse effects to environmental justice populations. This analysis was further updated in **Appendix B.12 "Environmental Justice"** of the FEIS to include additional discussion regarding pre-existing health and pollution burdens. The Proposed Project would also result in benefits that would accrue to environmental justice populations that use the facility and that live or work in the study area. Benefits would include enhanced bus service at the new terminal, the removal of buses from curbside positions, new employment and enhanced economic activity, and streetscape improvements. PANYNJ held a series of outreach meetings with Environmental Justice stakeholders in August 2023. Participants included state, county, and local government officials from New York and New Jersey, non-profit organizations, religious leaders, and ridership groups. The Environmental Justice stakeholders outreach meetings provided participants with an update on the design and planning of the Proposed Project with an opportunity for participants to share concerns and provide input on the Proposed Project. PANYNJ has and will continue to consider input from local stakeholders, including environmental justice populations, as the development of the Proposed Project advances. Public outreach, including outreach to environmental justice populations, will continue throughout the NEPA environmental review process, as well as during construction, as appropriate.

Comment Group 240 Offer/extend incentives for residential window replacement/city windows to offset significant traffic noise exacerbated by PABT Replacement Bus project to W 36th Street. (116)

Response As described in **Appendix B.6 "Noise"** of the FEIS, the noise analysis determined that at all receptors, noise, and vibration resulting from operation of the Proposed Project would result in noise and vibration level increases that would be imperceptible and would subsequently not constitute an adverse impact. Accordingly, the Proposed Project would not result in operational noise or vibration impacts and no mitigation would be required. However, as mitigation for the potential construction noise effects at buildings that do not have insulated glass windows and alternate means of ventilation, storm windows or window air conditioning units could be offered to building owners. These measures would improve the window/wall attenuation provided by the building facade and allow for the maintenance of a closed-window condition. The PANYNJ intends to develop noise mitigation measures for effected residential properties on a case-by-case basis. **Appendix B.7 "Construction"** of the FEIS provides additional information related to construction noise associated with the Proposed Project.

MISCELLANEOUS

Comment Group 241 Are there ways to correct and improve the inaccessibility issues exacerbated by the prior construction of the Lincoln Tunnel that would include options to provide further accessibility to all floors of the church structure? (32)

Response The PANYNJ does not anticipate making any discretionary modifications to private property.

Comment Group 242 Please Study: By design, the bus volume analysis does not incorporate growth rates that should be generated as a result of Congestion Pricing. Future bus demand needs to be better analyzed to determine how soon the terminal capacity will be exceeded. (15) As a provider of a regularly scheduled service in New York City, our primary focus is to provide our customers with a

safe reliable cost-effective transportation into NYC. Our service has the secondary benefits of helping reduce congestion and improve safety within the city since each passenger is not driving their own personal vehicle and our vehicles are driven by trained professional drivers. Adding an additional toll of between \$24-\$36, will negatively impact our ability to continue to provide a cost-effective service to our customers and most like greatly reduce the overall number of people we will transport daily. We strongly encourage MTA Bridges and Tunnels to reconsider this plan in order to allow companies such as ours to continue to provide a high quality economically available service. (43)

Response The EIS bases transportation analysis on existing conditions and known or likely future conditions. This would result in the transportation benefits of bus use, along with other modes of mass transit, into existing and future conditions. The future of the MTA's Congestion Pricing Program remains uncertain at the time of this publication, along with any potential uses of the funding that may support bus operations.

Comment Group 243 EPA suggests the document clarify if the anticipated changes to traffic due to the CBD tolling program are included in the modeling and discuss the influence that program may have on the impacts presented in the DEIS. (5) Will funding from congestion pricing initiatives be utilized as part of this project? Will terminal gate fees in the future consider the impact of congestion pricing as those fees are set for 2025 and beyond? (19) As a provider of a regularly scheduled service in New York City, our primary focus is to provide our customers with a safe reliable cost-effective transportation into NYC. Our service has the secondary benefits of helping reduce congestion and improve safety within the city since each passenger is not driving their own personal vehicle and our vehicles are driven by trained professional drivers. Adding an additional toll of between \$24-\$36, will negatively impact our ability to continue to provide a cost-effective service to our customers and most like greatly reduce the overall number of people we will transport daily. We strongly encourage MTA Bridges and Tunnels to reconsider this plan in order to allow companies such as ours to continue to provide a high quality economically available service. (43)

Response The DEIS explained that, given the uncertainty at the time of analysis (and continued uncertainty at the time of the publication of the FEIS) conditions which could be affected by the MTA's CBD Tolling Program (aka - 'Congestion Pricing') the most conservative set of assumptions were applied to the analysis. This consists of assuming that Congestion Pricing is not active when pertaining to traffic volumes (allowing traffic volumes to continue as though there were no toll or suppressive effect of tolling) but tolling is applied when it comes to transit trips (increasing the volume of transit riders).

The PANYNJ agrees that supporting bus services into NYC is a critical component of meeting the region's transportation needs. The PANYNJ is not involved in planning, implementing or operating the Congestion Pricing program

Comment Group 244 I'm trying to get the information in the about the DEIS. The table of contents says there are figures but I can't find those figures so if someone would get back to me and tell me how to find them. (91)

Response The DEIS can be found online on the [Port Authority's website](#). Individual chapters can be viewed by clicking on the links in the drop-down menu under "Draft Environmental Impact Statement." The Figures listed in the Table of Contents can be found in the individual chapter associated with the first number of the figure. For example, Figure 1-2 can be found in **Chapter 1**, Figure 3-4 can be found in **Chapter 3**, and Figure 9-6 can be found in **Chapter 9**. To view the figure you are looking for, first navigate to the correct chapter and then search for the figure number.

Comment Group 245 The Port Authority should contribute PILOTs (payments in lieu of taxes) to HYHK each year to offset the services that HYHK provides around the Port Authority properties. Although government owned/operated properties are exempt from the HYHK BID assessment, some institutions do make voluntary contributions. The Port Authority should estimate the HYHK assessment for all Port-owned street-facing retail space within the HYHK district and make annual PILOT contributions to HYHK based on those numbers. (27)

Response Thank you for your comment, your suggestion is noted.

Comment Group 246 We also celebrate the important union jobs that will be created with the construction of this project and would encourage local hiring or workforce development programs wherever possible. (4) Will construction jobs be required to be filled by local residents? Will local firms be given priority as contractors? (27)

Response The Replacement Facility's construction labor demand would be met by individuals living throughout the region, including workers from New York City, from New York State outside of New York City, and from counties in the northern and central NJ region.

Comment Group 247 Where will the Post Office trucks be parked overnight? (15)

Response The Proposed Project does not affect the ability of the United States Postal Service to operate.

Comment Group 248 Art Deco Lighting Towers. On Pages 6-14, as part of the construction, the art deco lighting towers, and portions of the brick portal walls from the north tube entrance of the Lincoln Tunnel are slated for removal. As part of the mitigation, MCB4 requests that these be salvaged, relocated, and repurposed as design elements in the new proposed public open spaces between West 37th and West 39th Streets, Ninth to Tenth Avenues. (15)

Response Detailed measures to avoid, minimize, or mitigate significant adverse impacts have been agreed upon through consultation between the FTA, New York State Historic Preservation Office (NYSHPO), and other signatories and concurring parties to the Programmatic Agreement (PA) as part of the Section 106 process. The PA can be found in **Appendix B.2.2** of this FEIS. PANYNJ will prepare a Historic American Engineering Record Level II recordation for the affected portions for the Lincoln Tunnel entrance portals, including the north tube entrance portal and the brick walls along the Dyer Avenue portion of the roadways that lead to the Lincoln Tunnel center tube and south tube that may be altered by the Project. PANYNJ will also develop a permanent interpretive display with the goal of documenting the history and significance of the Lincoln Tunnel entrance portals and making the information available to the public. The display, to be developed in coordination with the FTA and in consultation with NYSHPO and Concurring Parties, would include permanent signage, and public display of salvaged elements from the tunnel's brick walls and Art Deco light towers, subject to feasibility of removal and reuse as well as cost.

Comment Group 249 How will the final EIS address the design and use of the space between Metro and the Storage and Staging Facility? Design and security of adjacent property. Should the ramp remain adjacent to the Metro property, so too will the wasteland of unkempt residual space created at the edges of the circular ramp. These areas invite activities that impede the security and quality of life on the South side of West 40th Street. As part of the proposed design, the Storage and Staging Facility for all intents and purposes, remains a ramp structure at the street level directly adjacent to the Metro property. This does not mitigate a long history of disruptive noise and vibration created

by buses and other vehicles frequently throttling their engines to climb the ramp just feet from the church's sanctuary/community space. (32)

Response The PANYNJ appreciates your comment and will work to address your concerns as the design of SSF, ramps and circulation areas adjacent to the Replacement Facility continues to advance.

Comment Group 250 Also, we would like to request more information regarding the recent announcement from Mayor Eric Adams and Governor Kathy Hochul that a third tower will be constructed as part of this project and that PILOT funds will be used to partially finance the project. It may be appropriate to employ additional comment periods for Consulting Parties and the general public in light of this new development. (33)

Response A Memorandum of Understanding (MOU) regarding future Payment in Lieu of Taxes (PILOT) agreements was negotiated between PANYNJ and New York City that allows the PANYNJ to capture tax benefits projected to be generated by the two proposed private developments over the new Main Terminal and a potential site at West 30th Street and Dyer Avenue, a portion of which is owned by the PANYNJ; that possible development is not part of the Proposed Project. The PANYNJ's authority to proceed with the Replacement Facility is not dependent upon any tax benefits that might be derived from development on that or a different property. The site at West 30th Street was previously proposed for a hotel and residential development and that proposal was included in the cumulative analysis in the DEIS. Subsequently the site was identified as a possible assemblage for a commercial development and the cumulative impact analysis was augmented to account for this possible development. This analysis has been added in **Appendix B.1.2 "LT-3 Cumulative Evaluation"** in this FEIS.