



March 18, 2024

Elizabeth Rogak  
The Port Authority of New York and New Jersey  
4 World Trade Center, 150 Greenwich Street, 25th Floor  
New York, NY 10007

Dear Ms. Rogak,

We appreciate the opportunity to submit comments on the proposed Port Authority Bus Terminal replacement project. We cannot overstate the importance of the PABT replacement project to the future of our city. Originally opened over 70 years ago with its last major renovation in 1981, the current terminal is becoming increasingly obsolete and difficult to maintain. Critical components will need significant repairs or replacement within the next 5-15 years. Bus size and technology has advanced significantly requiring new accommodations. And the terminal cannot adequately handle projected growth in bus passenger volumes as it currently stands.

But perhaps most significantly, the replacement project will create a new, modern, efficient, and user-friendly transportation hub paramount to the continued growth and success of New York City. The new terminal will include close to double today's bus capacity at peak hours, a revived commercial space with additional street facing retail, two commercial towers, off street bus staging areas, new open spaces, widened sidewalks, overall improved aesthetics, and much more.

We commend the current proposal by the Port Authority and the extensive community engagement process thus far, and we look forward to further consideration of specific impacts of the project as part of the environmental review process.

The new bus terminal must serve the needs of commuters while also enhancing the lives of local residents and businesses, and the rest of the surrounding community.

### **Locally Preferred Alternative**

We are glad to see that the Port Authority is pursuing a project plan that reflects the extensive feedback from local stakeholders. After a planning process that began in 2013 and included a Master Plan study, engagement with stakeholders and public outreach, and a planning-level scoping process from 2019-2021, we now have the Locally Preferred Alternative considered in this EIS. This version of the project would build a replacement terminal in place, as well as new ramp structures, capacity to bring curbside intercity buses into the facility, staging and storing capacity, new open space on the Dyer deck-overs, new concessions and sidewalk amenities, and improved facilities. 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. We hope that throughout the environmental review and the public review process

the Port Authority continues to be receptive to feedback from Community Board 4 and other stakeholders in the neighborhood, particularly around how the new infrastructure and design of new facility elements will integrate into the area.

### **Land Use, Zoning, and Public Policy**

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 41<sup>st</sup> Street and for ramps over public streets or City property.

### **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.

### **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. We also ask that the agency work to minimize obstruction of views of the McGraw Hill Building's eastern façade.

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. This farm helps serve their membership base as well as all persons in need who rely on the food they get from Metro Baptist Church.

### **Transportation**

The Port Authority has anticipated a ridership demand of 337,000 passengers per day by 2040, including 42,000 evening peak-hour passenger arrivals and departures. Additionally, buses are larger than they were when the terminal opened in 1950, bus technology has advanced, particularly for electric buses, and the Port Authority anticipates that the structural slabs in the south wing will be functionally obsolete without investment by 2027-2037. 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. 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. 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. 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.

### **Construction**

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. 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 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. We also echo the board's concerns regarding traffic impacts during construction when roadways and the Lincoln Tunnel are fully or partially closed.

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.

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.

### **Open Space**

The Port Authority proposes to deck over two below-grade portions of Dyer Avenue during construction for bus operations and bus parking. After the replacement bus terminal is complete, the Port Authority will turn the Dyer Deck-Overs into public open space by 2040. 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.

### **Financing**

We commend the Port Authority not only for listening to feedback and developing the Locally Preferred Alternative 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.

We know that the Port Authority can address the concerns we've outlined above, and we look forward to working with you on the successful completion of this ambitious project.



Mark Levine  
Manhattan Borough President



Jerrold Nadler  
Congressman, District 12



Brad Hoylman-Sigal  
Senator, District 47



Tony Simone  
Assemblymember, District 75



Erik Bottcher  
Council Member, District 3