Bronx Council for Environmental Quality comments on the
2055 NYMTC Plan and Resilience Plan – Vision, Examples, Goals

1. **Trucks**

Vision:

Increased capacity of city streets in the metropolitan core through local DOT enforcement/design modifications for truck and commercial vehicle parking

Trucks are coming into New York City, and particularly the Bronx all the time. NYS DOT is ignoring the logistical demands of truck-bound freight coming in and out of NYC and is relying on NYC DOT city streets to serve as makeshift depots. New York City streets are not truck depots.

Local enforcement can regulate the time of day for travel and transport, places to park when at rest (and not on our streets, bridges, traffic islands, etc.), and special routes for each truck type and size. This is especially urgent during the warmer months where the air pollution increases with higher temperatures. Enforcement is urgent and should be the DOTs based on location.

Examples:

DOT put Jersey barriers around a triangle at the Jerome Avenue exit of the Cross Bronx expressway to stop trucks from resting there. There are other locations like Jerome Avenue where it is a service road for the Major Deegan in Van Cortland Park. In that case it doesn't help that there are two gas stations with rest rooms and food in the park along the highway making the whole thing a virtual rest stop for truck drivers. It's the same along the Deegan near Cedar Avenue Playground.

Goals:

Increased capacity for truck parking, stopping, idling, etc.

2. **Freight Networks**

Vision:

A regional freight rail/truck/boat transportation network that removes heavy truck traffic from secondary and tertiary roadways, alleviates idling pollution in dense urban neighborhoods, and speeds the delivery of goods and services to the metropolitan core.

What is needed is a comprehensive regional plan for heavy truck travel into and out of our communities. Satellite distribution centers removed from commercial districts could easily alleviate traffic and congestion that hinder local neighborhood economic development and bring truck idling pollution to our Bronx communities.

These need to be developed so that things can be delivered with the least impact on the quality of life of other economic and social segments in our communities.

Centralization of distribution facilities in the metropolitan core has come at a heavy price. Hunts Point is an unmitigated environmental disaster, creating and exacerbating chronic health problems due to truck idling. Only now do we see electrification coming to the site. Centralization, a longtime NYS logistical goal for freight, has a cost--and a price.

NYMTC needs to adopt guidelines and programs for mitigating exhaust at high volume sites and adopt "do no harm" principles for design, construction, and maintenance of its freight transfer facilities, especially as they are located in poor neighborhoods.

The Blue Highway initiative languishes while New York's waterfronts are rezoned to eliminate commercial and freight traffic. State IDA and DOT cooperation is needed with local zoning to ensure that waterfront deindustrialization does not eliminate all water-based distribution.

Examples:

Blue Highways initiative. It looks to be mostly focused on Brooklyn. There was an attempt to get the fish market involved in such a thing a long time ago but not much came of it. Why not?

Goals:

Increased local economic activity through greater mobility of goods and services; segregation of light and heavy truck traffic to benefit local economies and alleviate air pollution in neighborhoods; increased and purposeful investment in distribution infrastructure to grow state industries.

3. Rail Infrastructure in our community

Vision:

A transparent master planning process that engages MTA with the needs of the communities in which it locates its operations and houses its maintenance facilities and that distributes them equally and fairly across its service areas; a sustainability strategy that mitigates the environmental impacts of large facilities on communities.

Capital Improvements and Increasing Maintenance are an essential part of the complete transportation system. This should not only rely on complaints but should be on a regular basis and built into the cost analysis of any and all infrastructure. As this becomes standard operating procedures, sustainable choices will take the lead.

NYMTC plans for NYS should include MTA plans for transportation changes or improvements. Currently, MTA plans do not make their capital plans for their leased or owned property publicly transparent; they do not issue master plans for regions; they do not have public comment on the impact of their current or proposed space utilization planning.

Transportation facilities in our community have become a burden to surrounding neighborhoods. The failure of these facilities, which include MTA train depots, to manage stormwater in the Bronx have led to chronic flooding in the poorest Bronx communities. BCEQ supported MTA in their search for FHWA grants to manage and mitigate but we have seen no results and had no outreach from MTA to follow up on the dangers we noted in our comments/letter of support. Though MTA treats its facilities and properties as "islands," they are not isolated from the environment and neighborhoods in which they are located. Citizens need to know that MTA will not degrade their community's capacity for resilience.

All around the city streets MTA and their affiliates never remember to sweep the garbage or remove snow and ice around its perimeter. Along the waterfront and in the yards, it is worse.

MTA has made the dubious decision to place its maintenance and transfer facilities for its operations on the most precious public asset known to New York City--its shoreline. MTA tracks follow this shoreline from upstate but those that run through the Bronx are supplemented by facilities and sheds that compound the obstacles for community access to the Harlem River waterfront and expand the footprint of MTA, making shared use all but impossible. As there are many examples of shared use for active railroads through the nation, we find it absolutely discretionary and indefensible on the part of MTA to deny all collaboration/contact with longtime advocates of waterfront community, in and out of local government.

MTA sent a clear message to the Bronx when it decided to shift waste transfer operations from the underground facilities of the newly activated Grand Central Terminal to accommodate the direct commuter link with the LIRR. The Bronx has received more than its fair share. The warehousing of these facilities in a stretch of the Harlem River on which the poorest neighborhoods in the New York City reside calls for a reexamination, and public justification, for this discretion, which has no public review process, no environmental assessment, no authorization or consultation with local officials.

It is not neighborly to have facilities on the waterfront that are filled with garbage, cleaning the cars, or transferring trash. All over the world people treasure waterfronts. MTA has offered no funds or design to improve waterfronts in exchange for using them as industrial facilities.

All maintenance operations conducted at the waterfront sites should incorporate strict environmental controls given the proximity of the waterway and the use of industrial strength cleaners. Design modifications at these sites should ensure that there is no stormwater runoff or other pollutants going into the waterway. That includes the weed killer sprayed from the back of the train, which is totally inappropriate, as it not only harms our natural resources it is not healthy for people either.

NYMTC needs to issue ASAP a fair share analysis of MTA that quantifies the distribution of maintenance facilities and operation in its service area, cross referencing with population demographics. MTA is a huge land and lease owner in New York City, and controls the environmental health, waterfront planning, recreational access, and community development of all the communities that border its properties. Putting the trash and washing cars for the MN system along the Harlem River without becoming part of the statewide system to help clean up the river and build community access, is not fair, equitable, or effective. Access to the water is a sacred right. Clean water is part of that.

Examples:

Harlem River waterfront in the Bronx at Harlem River Yard, Highbridge Yard, Fordham Landing North (not sure how to describe it); TA yards at Water Place and 149th Street behind the old Post Office on the Concourse, etc.

Goals:

Immediately, adopt, implement and publicly list individual Stormwater Management Plan and Annual Report as required by law.

4. Bridges over water ways for cars, subways and railroads

Vision:

A bridge infrastructure that manages and recycles stormwater for productive uses.

With 14 bridges spanning the Harlem River, NYS DOT and NYC DOT bridges serve as prime sources of stormwater outfall into the river. Bridges need to be repaired and replaced with modern stormwater management systems that can redirect, retain, and when possible, recycle stormwater for greywater uses. As they are, these bridges are stormwater pollutant discharge systems that need to be brought to the modern age. The stormwater management for these highways is left to municipalities and their local sewer systems, or when those systems run through parks, on-site park management.

It is time for this off-loading of transportation infrastructure stormwater management from state to municipality to end. Since 1985, stormwater runoff from every bridge cannot discharge into a waterway. The rule is to treat all stormwater to the highest level of the waterbody based on its use. This needs to be a priority for the regional plan because bridges and roads are part of the waterbody infrastructure system and represent a large share of impervious surfaces across the city.

Examples:

Many of our rivers, including the Bronx and Harlem Rivers, have degraded. Recently, the state issued a proposal to lower the primary contact recreation use to secondary. While runoff from the bridges are not the only pollutants, that runoff is filled with oils and dirt from the roadways – which have the added complication of temperature, which has a impact on habitat.,

Goals:

Whenever a bridge has a capital project, it must include managing the scrubbers so that they are off loaded on the approaching bridge landscapes.

5. Resilience

Vision:

The complete system needs to consider resiliency as an every day goal. We note the focus on storm surge and coastal flooding resilience. But the plan needs to concentrate on non-coastal flooding as well--a principle cause of recent stormwater transit system shutdowns. In addition, the full transportation complex, including bus stops and subway stations, needs to adopt the rules for Managing Stormwater, like site specific Annual Stormwater Management Plans. Every one of your sites are in flood zones, and have no SMPs publicly available.

Examples:

An example of this would be to make another stop in the Bronx at the intersection of the 4, 5, 2 and Metro North at 149th Street behind the former Grand Concourse Post Office. This site needs special attention that is not limited to moving people to Manhattan but to other places like Connecticut and Westchester.

Another point would be the recent flooding of the #1 subway at 28th Street and also at 145th Street. You are responsible for managing your stormwater, and there are now many ways to do it. If you want to make sure it does not rain on the platform, you may have to help out on the street above, but building and maintaining green infrastructure – at the very least around the entrances to the subway stations.

Goals:

Good Housekeeping as required by the MS4 and CSO permits. Try to be a Good Neighbor.

6. **Environmental & Land Use -** See Chapter 4 for Goals and Fairness and access

Vision:

Recarbonize the properties of the Transportation Industry to protect the urban environment by using Green Infrastructure and ecosystem services including maintenance to create carbon to offset current levels of pollution. Use GI in all landscapes as much as possible to the point of creating 30% protected forest and/or GI, including creating wetlands.

Examples:

Comprehensive plan to reimagine the Cross Bronx Expressway, New England Thruway, Bruckner Expressway, and the Major Deegan Expressway by rebuilding all the via ducts and bridges, including stormwater management treating runoff.

Comprehensive Cross Bronx Expressway plan - bridges, decking, parallel bus routes, MS4 compliance.

Goals:

In the Recarbonization of the Biosphere: Ecosystems and the Global Carbon Cycle Book (2012), the abstract describes the model we need to adapt. The book explains how the biosphere, including urban lands are potential C sinks, see below:

> *Human activities are significantly modifying the natural global carbon (C) cycles, and concomitantly influence climate, ecosystems, and state and function of the Earth system. Ever increasing amounts of carbon dioxide (CO2) are added to the atmosphere by fossil fuel combustion but the biosphere is a potential C sink. Thus, a comprehensive understanding of C cycling in the biosphere is crucial for identifying and managing biospheric C sinks. Ecosystems with large C stocks which must be protected and sustainably managed are wetlands, peatlands, tropical rainforests, tropical savannas, grasslands, degraded/desertified lands, agricultural lands, and urban lands. However,*

land-based sinks require long-term management and a protection strategy because C stocks grow with a progressive improvement in ecosystem health.

In addition, the article "Evidence and attribution of the enhanced land carbon sink", Nature Reviews Earth & Environment, 25 July 2023. This article explains how long term sequestration is possible if nature based climate solutions and appropriate ecosystem management strategies are used:

Climate change has been partially mitigated by an increasing net land carbon sink in the terrestrial biosphere; understanding the processes that drive this sink is thus essential for protecting, managing and projecting this important ecosystem service. In this Review, we examine evidence for an enhanced land carbon sink and attribute the observed response to drivers and processes. This sink has doubled from 1.2 ± 0.5 PgC yr−1 in the 1960s to 3.1 ± 0.6 PgC yr−1 in the 2010s. This trend results largely from carbon dioxide fertilization increasing photosynthesis (driving an increase in the annual land carbon sink of >2 PgC globally since 1900), mainly in tropical forest regions, and elevated temperatures reducing cold limitation, mainly at higher latitudes. Continued long-term land carbon sequestration is possible through the end of this century under multiple emissions scenarios, especially if nature-based climate solutions and appropriate ecosystem management are used. A new generation of globally distributed field experiments is needed to improve understanding of future carbon sink potential by measuring belowground carbon release, the response to carbon dioxide enrichment, and long-term shifts in carbon allocation and turnover.

7. Enhanced community participation

Vision:

We cannot state enough that the lines of communication between the metropolitan transportation system are in need of work.

Examples:

A few things about the plans for renewing the Cross Bronx Expressway show a lack of planning.

In 2004 The State of New York performed a Major Investment Study (MIS) for the Cross Bronx and Major Deegan. Most of the Deegan work, the Highbridge Interchange and the Hamilton Bridge, has been completed. The Cross Bronx part is only now beginning. The MIS proposed "connector roads" alongside the Cross Bronx Expressway and areas of decking over it to carry part of the service roads for buses and for open space.

Goals:

A plan to "Reimagine the Cross Bronx Expressway" was released in 2025, twenty years later, nothing having happened for the Cross Bronx in the interim. It contains some of the same ideas, new side roads, decking/capping and open space. It does not include a bus route on the capped

portions, moving such Bus Rapid Transit ideas to the south and north. NYSDOT was heavily involved in this plan.

However, actual Cross Bronx Expressway projects are very different. When the current project to replace five bridges was presented in 2016 NYSDOT said the *"Bronx Borough President's Office asked if this project had any connection to the CBE Major Investment Study (MIS) that was done by NYSDOT. NYSDOT responded that while the proposed project does not incorporate the connector roadway recommended in the CBE MIS, it does not preclude that roadway from being implemented in the future."* The presentation said: Temporary three-lane structure south of existing mainline.

Now the idea of a permanent connector road has come back again but there is no plan or design to connect it to anything to the west. A second project at Third and Webster Avenues is at some stage of study or design, again with little or not reference to the 2004 or 2025 work to "fix" the Cross Bronx. There are no plans, or funding, to connect the connectors to each other or to much of anything to the west.

And there are more projects in development, apparently four expansions of the Cross Bronx, near Coop City. We have no information about what two of the "phases" might be. This expansion is taking place within walking distance of a new Metro North Station. Is it possible that the new station might reduce the need for more highway space?

A robust community driven plan to redesign the Cross Bronx puts the buses someplace else, State DOT told us in 2016 that the diversion structure was temporary, we have 20 years of planning that is invisible in the actual proposed construction. Even the new connector is only meant to: "Improve multi-modal accessibility within the project limits". We are expanding a highway right next to a train station, there are no funded mitigations for the communities through which the most infamous highway disaster in the country was built: no capping, no sound barriers, no new crossings, no open space expansions or improvements. This situation is neither just nor sensible.

Conclusion:

Thank you for this opportunity to comment. We are available to have a discussion anytime.

Sincerely,

Karen Argenti, BCEQ Recording Secretary – karen@bceq.org
Robert Fanuzzi, BCEQ President – robert@bceq.org

Formed in 1971, Bronx Council for Environmental Quality (BCEQ) has sought to establish a sound, forward-looking environmental policy regarding an aesthetic, unpolluted, environment protecting a natural and historic heritage. We are a volunteer organization with no staff.