June 6, 2019

Mr. Andrew Brooks  
Environmental Program Manager – Airports Division  
Federal Aviation Administration  
Eastern Regional Office, AEA-610  
1 Aviation Plaza  
Jamaica, NY 11434  
comments@lgaaccessesi.com

Re: LaGuardia Airport Access Improvement Project/Scoping Meeting Comments

Dear Mr. Brooks,

On behalf of the Waterfront Alliance, I submit these comments to the Federal Aviation Administration with recommendations for consideration as part of the environmental review process for the LaGuardia Airport Access Improvement Project.

Waterfront Alliance is a non-profit civic organization and coalition of more than 1,000 community and recreational groups, educational institutions, businesses, and other stakeholders. Our mission is to inspire and enable resilient, revitalized and accessible coastlines for all communities.

In recent years, New York City has seen remarkable progress with respect to water quality and waterfront recreation, as well as waterborne transit, reclaiming waterfronts that were historically actively used but became blighted through industrial use or cut off from communities through various infrastructure projects. Flushing Bay and Flushing Creek could benefit from the many improvements New York City’s waterfronts have experienced in recent years but currently face barriers with respect to access, investment and environmental issues.

We offer the following comments for the FAA’s review as the Agency undertakes drafting a project EIS:

**Potential Impacts on Open Space:** We are concerned by the impacts of the Port Authority’s proposed action (the above ground fixed guideway) on the Flushing Bay Promenade and access to Flushing Bay. The promenade and the connected World’s Fair Marina is an important open space asset to the community, and to the City, as part of Flushing Meadows Corona Park. Waterfronts and open space have known benefits for mental and physical health, and are critical for equitably supporting the growing communities of East Elmhurst, Jackson Heights, Corona, and Flushing. Flushing Bay also serves as a vital route for pleasure boats, ferries and other vessels heading to the East River. The promenade stretches 1.4 miles, from the base of the 27th Avenue overpass to the west to a new $1.6 million boat ramp to the east.
However, the Grand Central Parkway to the South, LaGuardia airport to the West and Willets Point to the East already surround this waterfront open space. Inaccessible overpasses and dark underpasses make getting to the promenade difficult. The potential impacts on access caused by construction followed by the more permanent impacts from the 35 foot-wide guideway just 30 feet overhead should be analyzed in the EIS. Shading of natural park areas and safety around darkened areas caused by stanchions should be analyzed in the EIS.

Waterfront Alliance, in partnership with Riverkeeper, was part of a visioning process that looked at habitat restoration, climate resilience, and public recreation around Flushing Bay, beyond remediation. Using the Waterfront Edge Design Guidelines, the visioning process encouraged more resilient, accessible, and ecologically friendly decision-making at the water’s edge. We encourage the EIS process to examine the results of the Visioning Plan that called for restoration of the World’s Fair Marina, improved pedestrian bridges, a large-scale oyster reef and new educational and recreational facilities.

**Consideration of Alternatives:** The “30-minute” ride, widely publicized as the travel time from Midtown to LGA, merits much greater analysis as this timeframe does not appear realistic. It might apply if you take the LIRR, but Willets Point currently only gets LIRR service when Citi Field is holding events such as Mets games and the trains run approximately 30 minutes apart. The LIRR has not committed to a more robust schedule. Another major question is how many riders would opt for the LIRR in the first place when the 7 train at Willets Point is a more affordable alternative. The 7 train, however, takes about 33 minutes itself to get from Grand Central to Willets Point. Capacity on the 7 train raises significant concerns, especially for peak hour trains.

Waterfront Alliance believes other viable transportation options should be thoroughly evaluated and seriously considered. These options require a fraction of the infrastructure investment and offer a competitive travel time to and from Manhattan. Ferries are increasingly recognized as combatting traffic congestion and air pollution and apply 21st-century solutions to New York's mobility needs. They give the city's commuters and visitors more options for getting where they need to go.

- A combination of improved bus connections and dedicated bus lanes around existing ferry terminals at Astoria and Long Island City would improve travel time to LGA. NYC Ferry routes launched recently have seen much higher than expected ridership and the EIS should consider the existing routes and how they can connect to LGA.

- Increased ferry access at Marine Air Terminal offers a serious and real alternative. We recommend the EIS evaluate a new ferry landing directly at LGA and Express Bus connections to this terminal.

**Water Quality and Environmental Impacts:** In 2018, more than 89,000-cubic-yards of sediment packed with decaying organic material have been dredged from Flushing Bay as part of a $200 million cleanup project to restore wetlands to its shore, and to upgrade the sewer system that has been overflowing into it for years. The shoreline is now being
filled with switch grass, salt grass, seaside goldenrod, smooth cordgrass and other wetlands plants. Impacts on this vegetation, during and post-construction, merit analysis in an EIS. The EIS should also study construction impacts of debris on the estuarine area, sediment stability and sub-surface noise.

**Impacts to Flushing Creek:** To serve the maintenance needs of the proposed AirTrain, the overall construction is proposed to include building a new Operations, Maintenance, and Storage Facility (OMSF) on the bank of Flushing Creek. This same area is also proposed to turn an existing temporary/overflow parking lot into permanent LGA employee parking. Flushing Creek is under a New York State approved Long Term Control Plan to preserve its recreational uses, and potentially raise them to primary contact recreation. In addition, the US Army Corps of Engineers is currently studying wetland ecosystem restoration for the Creek in areas immediately alongside the proposed OMSF and permanent parking lot within the NYC Department of City Planning’s Flushing Waterfront Revitalization Plan. Both construction and operations of the OMSF and employee parking lot would create significant additional polluted runoff into the adjacent Creek, carrying increased levels of contaminated silt and road salt into the water, adversely impacting the improvement of the Creek that is already underway. Finally, this part of the project, establishing an employee parking lot, does not serve the stated Project Purpose to “not contribute to roadway congestion.”

We thank you for your review of this important project, and look forward to commenting the EIS. Please feel free to reach out to me directly at (212) 935-9831 x101 with any questions.

Sincerely,

Roland Lewis  
President and CEO  
Waterfront Alliance