Submitted Testimony of
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at a meeting of the Gateway Development Corporation
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The New York Building Congress, a membership organization of New York City's design, real estate and construction industry, is here to reiterate its unwavering support for the Gateway Program.

We are pleased to see that additional concrete steps are being considered by the Gateway Development Corporation today, a sign that progress is being made on key construction elements that will pave the way for the larger Gateway Program components.

The Gateway Development Corporation The Building Congress therefore urges the lead agencies to ensure this NEPA process is the fastest ever for a project of this size. The lead agencies should ensure the highest level of cooperation and coordination of approvals among the dozens of involved federal, state, regional and local agencies. Administrative procedures that delay progress should be streamlined, and chapters or sections of the EIS which do not bear directly on project impacts should be reduced or eliminated.

The federal government will use its streamlined NEPA procedures for high-priority projects, a version of which was used successfully on the New New York Bridge Project. However, work on the Hudson Tunnel Project EIS is at an early phase upon entering this process than was the New New York Bridge, creating opportunities for delay and inaction. Given the worsening condition of the two existing tunnels, the FRA and its sister agencies should perform a "lessons learned" exercise from other accelerated NEPA actions to insure approvals are not delayed at any point.

Finally the EIS should consider phasing of construction for the tunnels, if such action will accelerate completion of the tunnel and allow for one of the existing, compromised tunnels to be taken offline and repaired more rapidly. This action should be considered only if there are appreciable benefits to be gained.

Thank you for this opportunity to comment.