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CITY OF NEW YORK

MANHATTAN COMMUNITY BOARD FOUR

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JOHN WEIS Chair

ROBERT J. BENFATTO, JR., ESQ. District Manager

February 16, 2010

Thomas F. Prendergast President MTA New York City Transit 2 Broadway New York, NY 10004

Re: #7 Train extension

Manhattan Community Board 4 (CB4) appreciates the opportunity to comment on the Metropolitan Transportation Authority's (MTA) plans to build four fan plants in our community to provide ventilation to the tunnels of the extended # 7 subway line. We request that the MTA improve significantly its buildings' interfaces with the sidewalk, by

- reducing the number of loading docks,
- working with the City and Con Edison to eliminate all grates on sidewalks,
- planting the full complement of trees in the Hudson Yards rezoned area at locations designated by CB4, and by
- activating the building walls at pedestrian level and allocating public vertical space to Community bulletins.

CB4 Land Use Committees will review zoning issues and the Board will issue a separate resolution.

The four fan plants will be located respectively at 26th Street, East of 11th Avenue, at the eastern corners of West 33rd and West 36th Streets and 11th Avenue, and on the northwest corner of West 41st Street and Dyer Avenue. The buildings are between 60' and 80' high with louvers for air exhaust. Two of them (26th and 33rd Streets) will be "overbuilt" with residential or mixed used developments that will surround and overhang above the MTA buildings. We are very pleased that pedestrian-scale lighting will be installed on each façade. We are also pleased that the MTA is committed to plant as many trees as possible, as required by the zoning.

Insuring pedestrian safety and maximum greening:

However, the provision of 131 ft of loading docks/driveways serving adjoining buildings will interfere with such greening and pedestrian safety. We are surprised that so many contiguous loading docks would be approved in a mixed-use residential environment, considering the recent efforts the Department of City Planning is making to reduce the size and frequency of driveways that interfere with walking.

The situation on West 33rd Street is most concerning: the future loading dock entrance is 68'-0" wide and 11'-0" high and is located along West 33rd Street, 91'-0" east of 11th Avenue (*provided for developer*). The rolling doors for equipment installation (2) are both 10'-0" wide and 12'-0" high. One door is located 27'-0" east of 11th Avenue, the other 78'-0" east of 11th Avenue.

The loading docks are located at 38' from the intersection at West 36th Street and 27' from the intersection on West 33rd Street.

The Western Rail Yards Environmental Impact Statement describes West 33rd Street as the main pedestrian thoroughfare. The transportation section indicates that all sidewalks will be overcrowded along 33rd Street. In this context, it is difficult to imagine how 88' of driveways will not interfere with pedestrian flow.

- MTA should work with Hudson Yards Development Corporation (HYDC) and City Planning to limit the number of driveways and loading docks to respect the letter and the purpose of the zoning: (93-00-a) "to facilitate and guide the development of an environmentally beneficial transit-oriented business and residence district by coordinating high density development with ... improved pedestrian circulation and avoidance of conflicts with vehicular traffic."
- Driveways and loading bays should comply with the existing requirements to be located at a minimum of 50' from an intersection. They also should be limited in length and properly spaced, as the zoning requires.
- Driveways should be designed in compliance with ADA guidelines to provide for a continuous flat pedestrian path.

The current policy of Con Edison to install grates on the sidewalk at the curbside will further reduce the space available to plant trees. In the points of Agreements of the Western Rail Yards, the City committed to work with Con Edison to change this policy.

- We recommend that MTA and HYDC work with the City and the Department of Transportation (DOT) to ensure that Con Edison grates are not located on the sidewalk.
- CB4 asks that once the plantings have been maximized, MTA identifies the number of trees that cannot be planted on the sidewalks adjacent to their properties because of obstructions and plant them as early as feasible at alternate planting locations designated by the Parks Department, as required by the zoning text (26-41). CB4 will provide a list of such locations to the Parks Department in the rezoned area.

Preserving the pedestrian orientation of ground floor uses: The total length of continuous granite facade adds up to about 600 ft. While this would be acceptable in the fast disappearing manufacturing environment of today, it is at odds with the purpose of the Hudson Yards rezoning: (94-00) "to preserve the pedestrian orientation of ground floor uses, and thus safeguard a traditional quality of the City". It is also contrary to the principles this board has long advocated for, in particular for large infrastructure

buildings: "to incorporate at street level arcade or shallow retail spaces [...to] enliven the streetscape and better integrate the facility into the neighborhood."

 We encourage MTA and HYDC to work with CB4 to activate this valuable "vertical public space", just like the walls of subway stations. Awnings and welllit windows for artists' exhibition or TV flat screens should all be considered. In particular, CB4 would appreciate the allocation of half of the outfitted space for community driven displays.

Sincerely,

John Weis

Chair

Manhattan Community Board No. 4

Jacoben -

Christine Berthet

Co-Chair

Transportation Planning Committee

Jay Marcus

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Transportation Planning Committee

CC: NYC Council Speaker Christine Quinn

HYDC, Ann Weisbrod

MTA, Adrienne Taub

DOT, Commissioner Margaret Forgione

Manhattan Borough President Scott Stringer

Hon. Thomas Duane

Hon. Richard Gottfried

Hon. Gale Brewer

Hon. Jerrald Nadler

¹ March 2003 Letter to Amanda Burden Re: DCP's "Preferred Direction" for Hell's Kitchen/Hudson Yards