



CITY OF NEW YORK

MANHATTAN COMMUNITY BOARD FOUR

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July 29, 2011

Noreen Doyle, Acting President
Hudson River Park Trust
353 West Street, Pier 40, 2nd Floor
New York, NY 10014

Re: Pier 57 Environmental Impact Statement Draft Scope of Work

Dear Ms. Doyle:

Manhattan Community Board 4 (CB4) is pleased to offer the following comments on the Draft Scope of Work for the Pier 57 Environmental Impact Statement.

CB4 has been consistently engaged in the development process for the entire waterfront on the west side from the beginning of the current effort. We have held public forums and many smaller meetings to solicit the community's participation, and have provided written comments.

Our detailed comments on the proposed Scope of Work follow our general comments on the Project Description.

THE PROJECT DESCRIPTION

The project site consists of historic Pier 57, adjacent lands underwater, and some associated frontage area, all of which are located in Hudson River Park at approximately West 15th Street. Immediately adjacent to and east of the site are other portions of Hudson River Park and the Route 9A bikeway and roadway.

The applicant—Young Woo & Associates, through the entity Hudson Eagle LLC (“Hudson Eagle”)—proposes to redevelop the Pier 57 site with retail, restaurant and other commercial uses; a marina; and educational and cultural and public open spaces uses. As part of the proposed project, the Pier 57 supporting caissons and pier structure would be rehabilitated and repaired.

The project would also preserve an important physical component of the waterfront's history and reintroduce some maritime uses to a pier once built explicitly for that purpose while also introducing innovative architectural components designed to respect and enliven the historic structure.

PROPOSED ACTIONS

To develop the proposed project, various city, state, and federal actions would be required:

CITY ACTIONS

- Zoning map amendment. The applicant would seek an amendment to the New York City zoning map to rezone the project site from M2-3 to a district that would allow the public market and anticipated floor area.
- Zoning text change. The applicant would seek a zoning text change to allow community facility uses (e.g., cooking school) in certain manufacturing zoning districts.
- Relief from various Waterfront Zoning Regulations related to bulk, height and setback, yards, public access and visual corridors, and design requirements. The applicant will continue to have discussions with the New York City Department of City Planning as design concepts progress.
- BSA approval to modify certain building and fire code provisions. The applicant would seek approval to modify certain Building and Fire Code provisions pursuant to Section 666 of the New York City Charter, including but not limited to, those provisions regarding egress.
- Special permit for retail in excess of 10,000 sf.

STATE ACTIONS

- NYSDEC—the applicant would seek a Part 608 Protection of Waters permit for in-water work.
- NYSDOT—approvals related to site access at Route 9A.

FEDERAL ACTIONS

- U.S. Army Corps of Engineers (USACE). The applicant would seek Section 10 and Section 404 permits for work in the navigable waters of the United States.

COMMENTS ON THE SCOPE OF WORK

Task 1 – Project Description

CB4 has consistently held the position that the primary standard on which the pier should be awarded is its compatibility with the Park and community and the degree that it enriches rather than diminishes them. Pier 57 was not designated as a source of income for the Park. To treat it as a major income producer is to risk increasing rather than mitigating the burden of separation from the water and increased traffic in the Park already suffered by the Chelsea community, which has been an early and consistent advocate for the Park.

Task 5 - Open Space

CB4 has repeatedly argued that there are major ways in which Pier 57 should make a contribution to the Park and community. The first is the provision of open space and waterfront access to a community that has long been cut off from the water, and remains so more than most others in the neighborhood of the Park. This means that more space than the legally required walkway around the pier is necessary: space must be available both at the end of the pier and on its upper levels to provide relaxation and opportunity for enjoying the remarkable views the pier offers. Opportunities for both viewing and participating in recreational boating, especially hand- and wind-powered, were prominent in the discussions of the Working Group. Restaurants and cafes with river views would offer a widely-popular amenity all but unavailable along the Hudson River. The huge structure offers opportunities for sports or activities of many kinds.

Uses should ideally be not only compatible with those existing in the area but also support and reinforce such desirable uses as the arts. While exhibition space for the visual arts so prominent in Chelsea, such as a Kunsthalle for traveling shows, and performance space for the always-pressured performing arts are obvious opportunities, the large spaces within the pier and the huge underwater caissons below could also provide support space of all types.

Task 7 –Historic Resources

The caissons, inspired by those used in the Normandy landing in 1944, make Pier 57 an extraordinary feat of engineering and a major historic landmark. It is the only pier on the North River waterfront that remains largely intact and is one of the few links that Chelsea retains to its historic past as the center of the busiest waterfront in the world. This points to the necessity of preserving and restoring to the greatest degree feasible, both the exterior appearance and significant historic features inside the structure. The façade of the pier and the walk way in front of it must retain as much of their appropriate character as possible. Exhibits or museums reflecting the history of the harbor and the river as well as mooring space for historic vessels are particularly appropriate uses.

In addition, the Historic Resources section of the EAS needs to identify an abundance of resources in or near the designated area. Buildings should be identified and studied (e.g., Bayview Prison for Women) in the EAS that embody the neighborhood's transformation over the numerous years.

Task 13 - Energy

It is hoped that the developer will do more than the state and city rules require to produce a sustainable energy building. What would be required are:

- reuse of as much existing materials as possible;
- new cladding of the building should attempt to maximize energy performance through the use of shading and thermal insulation;

- studying how because the building is on an east-west axis, benefits from shading from southern exposure could be significant much of the year; receiving direct sunlight could be significant for heating and lighting the building at other times;
- use of natural ventilation wherever possible makes both for a saving of energy and makes for a more pleasant experience;
- use of a closed loop hydrothermal system to dispel excess heat;
- examine the feasibility of an underfoot radiant heating system; and
- storm water could be used by storing it in a caisson for use in washing down the exterior of the pier structure.

It is also hoped that the developer aspires to at least a Gold LEED rating.

The building should be used not just as a school for cooking, but also as a school demonstrating energy conservation for the hundreds of thousands of people who will visit the pier.

Task 14 - Transportation

One major concern is the traffic that the developed pier would attract. The West Side Highway nearby is chronically backed up, and the local streets that might offer alternative access are already heavily used and pass through increasingly residential areas. Fulton Houses, with children that are often in the street of lack of adequate play space, would be especially affected. West 16th Street is all but impassable much of the workday, and is severely narrowed by parked trucks at other times.

We recommend that the following aspects be included in the scope of the EIS:

Parking – loading – unloading

- 1- Study an alternate option with no car parking,
- 2- Study the reservoir necessary in the parking to absorb high volumes related to events. We note the parking operation is based on using triple stackers. Such operation will require much more time to store the cars or more space for staging and reservoir than a no stacker operation.
- 3- How many visitors will come by bike, especially considering next years implementation of bike share? Will there be sufficient parking for bikes on the premises? Will there be bike share stations on the premises?
- 4- Study the impact on traffic flow of having the entrance to the parking caisson through the northern passage instead of the southern passage. The planned entrance through the southern passage will require that each parking vehicle drive in front of the pier twice, once on the way to the parking garage and once after leaving it.
- 5- Include in the study sufficient delivery trips to support the “Market” concept. Such a large volume of deliveries will create dangerous conditions for the greenway. Provide for mitigation measures with speed tables, etc.

6- Study the queuing of taxis and limos for pickup and delivery at large events. We are concerned that, when the service road is full, taxis will let passengers out on the highway. Should a portion of the 150 parking be converted to a circle for passenger pick up and delivery?

Pedestrians – bicycles

1- Study of bicycle and pedestrian volumes on the Greenway, impact of coming in and out of the 3,000 people venue and normal visitors arriving by bikes and foot by the greenway or from the east. How will these conflicts be mitigated on the greenway?

2- Study the volume of cars arriving from 17th Street to make a South turn onto the turning lane and study of the volume of pedestrians crossing the highway at this intersection. Should there be a split phase on 17th Street turning south to protect pedestrians from tuning cars?

3- Study the volume of pedestrians crossing the highway and their age distribution. Is the crossing time sufficient to allow children, elderly and large volumes to cross the highway?

4- Study the pedestrian volumes and cars conflicts on the west crosswalk of 15th Street at 10th Avenue. Should a split signal be installed on 10th Avenue?

Mass Transit

1- Include in the study a projection of tourist buses that will bring visitors and where they will lay over.

2- Study an alternate case with a Bus Rapid Transit on 11th Avenue coming from 72nd Street and ending at Battery Park.

Task 19 - Construction

The construction impact on traffic, noise, air quality, and the times for construction of this project will be overwhelming. The residents and businesses around Pier 57 are already experiencing horrendous noise, air quality and traffic conditions due to the present construction activities. For example, the Chelsea Market may soon be going through a major reconstruction that will clearly affect this community. This project will be bigger than present projects, and its impacts even worse. The needs of the surrounding community must be considered too.

We ask that when looking into the construction impact it be done an with eye toward the formation of a construction task force, which would include representatives from the applicant, the effected CBs, all the involved public agencies and local residents, representatives from the community and local businesses (especially those facing possible displacement). The construction impacts must be mitigated to the greatest extent possible. The task force should begin work prior to the start of construction and should continue to meet regularly throughout the period of construction.

Task 21 – Alternatives

- A- Bus rapid transit on Eleventh Avenue, no parking, theater at 3,000
- B- No parking, theater limited to 1,500
- C- Parking, theater at 3,000, service road below grade, Greenway and pedestrians at grade.

Task 22 – Mitigation

All adverse impacts found to require mitigation must be presented.

Sincerely,



Corey Johnson
Chair
Manhattan CB4

cc: Honorable Jerrold Nadler, Member of United States Congress
Honorable Tom Duane, New York State Senator
Honorable Richard N. Gottfried, Member, New York State Assembly
Honorable Deborah Glick, Member, New York State Assembly
Honorable Christine Quinn, Speaker, New York City Council
U.S. Army Corps of Engineers
NYS Department of Environmental Conservation
NYS Department of Transportation
NYS Office of Parks, Recreation and Historic Preservation
NYS Historic Preservation Office
NYS Department of State