



CITY OF NEW YORK

MANHATTAN COMMUNITY BOARD FOUR

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June 1, 2007

Commissioner John Doherty
Department of Sanitation, New York City
125 Worth Street
New York, NY 10013

President Robert Lieber
NYC Economic Development Corporation
110 William Street
New York, NY 10038

Re: Alternative waste transfer options

Dear Commissioner Doherty and President Lieber:

The City's Solid Waste Management Plan (SWMP) currently calls for the following within Hudson River Park, 50% of which falls with Manhattan Community District 4 (CD4):

1. The building of a new Marine Transfer Station (MTS) for recyclables on Gansevoort Peninsula.
2. Changing the existing Marine Transfer Station at Pier 99 from recyclables to commercial waste

Pier 99 is within CD4's boundary and Gansevoort is immediately adjacent to its southern boundary but within Community District 2. As you are aware, both Community Board 4 and Community B2, along with Community Board 7 (immediately north and adjacent to Pier 99) and most of the area's elected officials and many other organizations including the Friends of Hudson River Park, are opposed to these two proposals for the following reasons:

1. The new MTS on Gansevoort would be in violation of the Hudson River Park Act, would require the alienation of much needed park land, and would be totally incompatible with the planned park uses planned for Gansevoort, which is the only large part of the park on real ground and at a real distance from the noise of highway traffic.
2. The change at Pier 99 from recyclables to commercial waste would also be in violation of the Hudson River Park Act (only a municipal use is permitted) and would negatively affect not only Hudson River Park but also the neighboring Riverside Park South.
3. Activating both facilities would place two major waste transfer facilities in a single park within 45 blocks of each other, with two crossings of the bike/walkway and sanitation truck backups in the respective residential communities just upland of both locations.

We are not opposed to, and in fact, applaud, the overall goals of the SWMP, and we agree that the waste generated from the Manhattan midtown to downtown areas should be handled within the area and not be transported by truck to uptown or locations in other boroughs, some of which currently take an unfair share of Manhattan's waste. But we strongly believe that the City has not explored or considered alternatives within the area, including the following two possibilities within CD4.

1. Underground rail options that preliminary studies suggest may be viable in the corridor from approximately 34th Street up to 59th Street between 10th and 11th Avenues.
2. An option to use Pier 76 as a single MTS capable of handling both recyclables and commercial waste, freeing up both Gansevoort and Pier 99 for park and/or park compatible water-dependant uses.

Manhattan Community Board 4 has considered the positive features of the Pier 76 option, which include:

1. This plan would provide a single location relatively close to the source of waste.
2. This plan calls for the adaptive reuse of a pier that currently has no plan and that is located well away from a residential neighborhood, behind the Javits Convention Center.
3. The size of the pier not only permits its use for both recyclables and commercial waste, but probably also affords sufficient space to allow queuing of trucks to be contained within the structure, rather than on streets and avenues leading to and from the location.
4. The pier is wide enough to allow a design that permits trucks to enter and leave the facility without crossing the bike/walkway by either ramping up east of the bike/walkway and crossing over to access the building or by gradually ramping the bike/walkway to pass over the truck access.
5. The Hudson River Park Act calls for at least 50% of the area of Pier 76 to become park use once the tow-pound is relocated, but this plan could conceivably result in closer to 100% park use on the roof of the pier shed as well as at grade in the area of the north and south portions of the very wide head house. This additional park use could partially make up for the apparent loss of the active recreation park on Block 675 (29th to 30th Streets between 11th and 12th Avenues) that was part of the City's Hudson Yards plan and studied as open space in the Hudson Yards Environmental Impact Statement.
6. As an important benefit, this plan would free up Gansevoort and Pier 99 for park use. Indeed, securing Gansevoort and converting Pier 99 to park use are prerequisites for CB4 to support use of Pier 76 as an MTS.

Manhattan CB4 believes that the city has not sufficiently explored these or other options other than to advance a proposal that significantly impacts Hudson River Park. We, therefore, strongly urge the city to seriously study and consider the above options before finalizing the portions of the SWMP that affect our community. We will be happy to meet and discuss these issues with you directly.

Sincerely,



J. Lee Compton
Chair
Manhattan Community Board 4

Kristin Dionne
Co-Chair
Waterfront and Parks



John Doswell
Co-Chair
Waterfront and Parks

cc: Elected Officials
CPOP
HRPT
CBs 2 & 7
FOHRP