



CITY OF NEW YORK

MANHATTAN COMMUNITY BOARD FOUR

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J. LEE COMPTON
Chair

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

May 25, 2007

Pete Grannis
Commissioner
New York State
Department of Environmental Conservation
625 Broadway
Albany, NY 12233-1011

Dear Commissioner Grannis:

Manhattan Community Board 4 opposes New York State Department of Environmental Conservation (DEC)'s proposal to remove the parking provision from the 1982 New York State Implementation Plan (SIP). This provision has proven to be an effective tool in the quest for improved air quality, and we believe that the proposed change threatens to reverse 25 years of progress.

The City still is not in compliance with the ozone targets that were part of the 1973 SIP for carbon monoxide and hydrocarbons, and while the DEC claims that New York City is now in compliance with carbon monoxide targets we do not believe that the sampling methods employed allow DEC to draw that conclusion.

The determination of compliance was based on seven measurement sites distributed throughout the City, with none of them located in the heart of Community District 4. The City's health statistics show that CD4 has 25% more deaths by chronic lung disease than the New York City average and 70 % more than the Upper East Side, which suggests that measurements were not made where they would have been most relevant and where they were most likely to have demonstrated non-compliance.

While the SIP does not include an explicit target for the parking provision, there is a significant correlation between the quantity of parking provided and employee transportation mode split (Moral & Bolger, 1996). Therefore, the parking provision in the SIP is instrumental as a means to reduce traffic congestion and improving air quality in the city

The proposed additional parking capacity is concentrated in CD4, with more than 20,000 new parking spaces from the Hudson Yards rezoning alone.

Once the city is allowed to approve more parking, it will do so. The prime example is Hudson Yards; where over 20,000 new parking spaces are allowed to be constructed in the Manhattan Central Business District, a 15% increase over current levels.

Trusting the city to self-discipline is naïve at best: While the current mayor is a proponent of clean air policy, we cannot trust that future mayors will be as forward thinking. Worse of all, such a far-reaching change of clean air enforcement is the wrong tool to respond to a localized lawsuit.

Sincerely



J. Lee Compton

Chair

Manhattan Community Board Four

cc: Robert D. Bielawa, P.E., NYSDEC, Division of Air Resources, 625 Broadway, Albany, NY
12233

Electeds