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**MANHATTAN COMMUNITY BOARD FOUR**

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December 18, 2012

Director Amanda M. Burden  
Department of City Planning  
22 Reade Street  
New York, New York 10007

**Re: ULURP Applications Nos. 130100ZMM, 130101ZSM, 130102ZSM, N130103ZSM  
and 130104ZCM - Pier 57**

Dear Chair Burden:

Manhattan Community Board 4 is pleased to provide the following comments on the Draft Environmental Impact Statement for preparation of a Final Environmental Impact Statement for the project commonly known as Pier 57.

**PROJECT OVERVIEW**

Pier 57 is located west of Route 9A at the ends of 16<sup>th</sup> and 17<sup>th</sup> Streets, within Hudson River Park. To the north are Piers 59 through 62, the Chelsea Piers complex, and to the south is Pier 54, planned to be developed as an open public park pier, and Gansevoort Peninsula, planned to be developed as public park land. Among the Hudson River piers, Pier 57 is unique in that it was built on three giant concrete caissons that were constructed up-river and floated into position. The pier is listed on the State and National Registers of Historic Places and is currently vacant.

The current proposal is the result of an RFP issued by the Hudson River Park Trust (HRPT) four years ago. It was selected from three respondents following review by HRPT as well as The HRPT Advisory Council, which includes members from Community Boards 1, 2 and 4. The proposed redevelopment, renovation, reuse and enlargement of Pier 57 would be consistent with and further the goals of the Hudson River Park Act in that it involves the reuse of the historic pier for uses beneficial to the public.

The proposed project would rehabilitate and redevelop the vacant Pier 57 site with a major new public open space and a perimeter walkway, and provide new retail, restaurant and other commercial uses, as well as educational, cultural, boating and rooftop open space uses, and accessory parking. The proposed development program is expected to include the following major land uses:

- 260,000 SF of retail and restaurant space;
- 11,000 SF of cultural use (i.e., 300-seat theatre);
- 33,000 SF technical arts school;
- 40,000 SF of art gallery/exhibit space (at the caisson level);
- 73,000 SF rooftop space (for open space use and programmed events);
- 141-slip marina;
- Accessory parking for a maximum of 74 vehicles; and
- Water taxi landing.

The primary retail use proposed for the project site would be designed as a planned public marketplace modeled on several existing year-round markets located in London, England and on one recently implemented on a temporary basis as the DeKalb Market in Brooklyn. At Pier 57, this public marketplace concept draws specific inspiration from existing businesses in West Chelsea and the Meatpacking District in the realms of fashion, design, art, and food.

Repurposed shipping containers would be stacked to create four market levels (first floor, first-floor mezzanine, second floor, and second-floor mezzanine). In combination with some traditional walled enclosures, these containers would create multiple “work/sell” retail stores and showrooms expected to range in size between approximately 160 and 640 SF. These retail uses would be oriented primarily toward a collection of independent designers and food purveyors. The work/sell marketplace would be an incubator for new retail businesses, designers, and food-related businesses as well as a community gathering place. Towards the western end of the pier shed, the design would open to a large double-height space with views of the water to the north and south. This end of the pier shed would include open, public “piazza” spaces to be used for occasional entertainment or small-format displays, and would be designed to accommodate rotating food markets and “bazaars,” with the idea of providing lively surroundings for resident and visiting chefs and food purveyors to exhibit and promote their food products.

In addition, the proposed project would add the following new public open space elements:

- **Waterfront Public Access Areas** - The existing perimeter walkway extending around most of the pier would be repaired and extended to connect with the Hudson River Park waterfront esplanade to the east of the pier, consistent with existing permits previously received by HRPT. The walkway would include approximately 800 linear feet of seating. In addition, new public walkways parallel to the existing bulkhead, previously approved and permitted, would extend to the north and south, extending the currently limited public circulation space along the headhouse. Treatments would be compatible with existing designs for areas bordering the river within Hudson River Park.
- **Rooftop open space** - Approximately 1.6 acres of open space would be created on the pier’s finger building. The roof would be divided into open areas on the eastern and western portions of the rooftop with a pavilion in the center. The open areas on the eastern and western portions of the rooftop would mostly provide flexible space for seating, relaxation, and views of the river, with a capacity for approximately 2,500 persons. These areas could include wooden decking, hardscape, paving, and small lawn areas. The center of the rooftop would contain a pavilion with a public observation deck on the roof and wide stairs on the east that would

function as seating areas during events. It is also expected that portions of the headhouse rooftop would be accessible to the public and function primarily as open space, but may be programmed for events, e.g., the Tribeca Film Festival.

## **THE DRAFT SUPPLEMENTAL ENVIRONMENTAL IMPACT STATEMENT**

The following are specific comments on several of the individual sections discussed in the DEIS.

### **Land Use, Zoning, and Public Policy**

The Board strongly supports the redevelopment of Pier 57 and believes that the proposed project would be an excellent addition to Hudson River Park and to the community. We believe, however, that there are elements of the proposal that should be reconsidered in order to protect the interests of the community.

While we understand the applicants' desire for the proposed M1-5 zoning designation, the change potentially opens the door to future as-of-right bulk, height and uses that CB4 believes are undesirable.

- a. CB4 recommends that the application for a Zoning Map Change be approved only if a deed restriction or similar device be placed on Pier 57 to limit the FAR to the 2.23 the applicants are requesting for the proposed development. The applicants have indicated that they would support such a restriction.
- b. CB4 recommends that the application for a Zoning Map Change be approved only if a deed restriction or similar device be placed on Pier 57 to preclude hotel uses. We understand that the current proposal does not include a hotel and that the Hudson River Park Act currently does not permit hotels, but since the proposed M1-5 zoning permits hotels as-of-right we would greatly prefer one more safeguard against this use that the community strongly opposes on piers in Hudson River Park. The applicants have indicated that they would support such a restriction.
- c. CB4 recommends that the application for a Zoning Map Change be approved only if a deed restriction or similar device be placed on Pier 57 to preclude "big box" retailers or discounters. The applicants have indicated that they would support such a restriction.

### **Socioeconomic Conditions**

#### **Business**

The proposed project would not result in significant adverse impacts due to direct business displacement. Pier 57 would join neighboring Western Beef and Chelsea Market (also slated for an expansion by 2017) along with the areas distinct concentrations of shoppers' goods stores, including concentrations of art galleries in Chelsea and high-end boutiques in the Meatpacking District. In the end, it will have limited impact on any market displacement and rent increases.

However, it does provide an opportunity for local residents with a place to look for when job hunting. We asked that the applicant agree to support a Jobs Program for Chelsea Market and to work with CB4 in its implementation. They agreed to place a link to job openings on the CB4 website, to hold periodic job fairs in coordination with CB4 and to work with its future tenants on a best efforts basis to identify and hire employees from within Community District 4.

### Residents

The proposed project would not result in significant adverse impacts due to direct or indirect residential displacement. The proposed project would redevelop a vacant building, and therefore would not directly displace any residents.

### Community Facilities and Services

No comments.

### Open Space

No comments.

### Shadows

No comments.

### Historic Resources and Urban Design and Visual Resources

We recognize that the proposed changes to the physical structure and visual resources of Pier 57 will have significant impacts on the historic character of the pier and the visual resources it represents, but believes they should be accepted as a whole as forming the most feasible proposal for both the reuse of the structure as an active feature of the Hudson River Park and as a necessary source of income for the park under the original scheme for supporting the park.

The proposals for the pier include provisions for restoration and reuse of the greater part of the exterior of the pier and of many of the interior elements. The extensive rooftop changes elsewhere on the pier shed will make possible an elaborate park program at this location. The interior changes just below at both head house and pier shed will enable an elaborate retail proposal that will contribute major funding to the park in accordance with the function of this pier in the park master plan. In mitigation, maritime and other park-related uses will occupy much of the original lower levels to the south and west of the retail and in the adjoining water.

This proposal largely maintains the historic levels on the interior. Besides maintaining this important feature of the original structure and use, this feature enables retention of the largely intact features of the route taken inside the pier by passengers and light luggage departing by steamer, a now rare relic of the historic port that the applicant has recently announced his intention to restore. The Board regards this laudable action as significant partial mitigation for the alterations elsewhere and accepts the changes above and on the outside of the pier shed and

within the portion of the head house directly in front of the shed and behind the restored front as regrettable necessities in accordance with the basic provisions for park funding.

We are concerned, however, that the head house roof is to be raised over the north wing and that the existing light structure there, clearly visible from highway and the park walkway to the north, is to be replaced by a banal modern one. We believe this is an unnecessary loss. The roof location would only provide a minor contribution to the extensive retail level below. The light structure is significant in that it is the only remaining feature that recalls that the pier did not stand alone but was part of a group of major passenger and freight piers, especially the present Chelsea Piers to the north. Indeed its purpose was to provide a connection with the rooftop of the now demolished pier just to the north. Its partial glass enclosure within a light metal framework is also attractive in itself, and would also reflect the constant changes constantly taking place on this active waterfront, even on this most monumental group of piers. It could provide a sheltered location for users of the rooftop to enjoy shade and views to the city to the east, and perhaps even be a spot for refreshments for visitors to this portion of the roof.

### **Natural Resources**

No comments.

### **Hazardous Material**

No comments.

### **Water and Sewer Infrastructure**

This DEIS tells us the project's effect on the city's water and sewer infrastructure, solid waste management services, and energy use "would be minimal and would not significantly impact existing infrastructure."<sup>1</sup>

Nowhere is there any indication that the project will use state-of-the-art management techniques in these areas. If not, the project misses an opportunity to educate the public about the importance of managing these areas.

We are pleased to note that the project will send storm water directly to the Hudson River. Other projects in our area should manage uncontaminated water in the same way. However, nowhere is there an indication that some amount of the storm water would be captured for use in HVAC equipment, gardening and for cleaning. We believe that some amount of storm water capture retention should occur in this project as that would diminish the project's 132,603 gallons per day reliance on the city's drinking water supply.

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<sup>1</sup>DEIS, Chapter 11-1

## **Solid Waste**

The DEIS states that “it is expected that all solid waste generated by the proposed project would be handled by private carters.”<sup>2</sup> Nowhere does it say anything about recycling within the project or specific areas in which collected recyclable materials could be stored before picked up. Nor is there mention of composting surely for garden materials and possibly for food. We believe that missing here is an opportunity to reduce the amount of solid waste and to educate the public visiting the site about municipal solid waste issues.

## **Energy**

The DEIS states that “the proposed project would generate an incremental increase in energy demand that would be negligible when compared to the overall demand within Con Edison’s New York City and Westchester County service area.”<sup>3</sup> Further, the DEIS indicates Energy Star and other efficient electrical equipment will be used.

The Board is pleased with those statements but would also like to see the project study the possibility of installing solar voltaic collection devices on the roof possibly instead of the wisteria clad trellises currently in the design shown to the Waterfront and Parks Committee and thus reduce the projected demand for 93,004 million BTUs of energy needed per year. This would both be an energy producer and a public educational opportunity.

## **Transportation**

The traffic issues associated with the redevelopment of Pier 57 have been among the most difficult to resolve and led to community opposition to earlier proposals. CB4 believes that the current proposal successfully addresses the community's concerns and is grateful for the applicants' diligent attention to these issues. Our one remaining concern is the intersection of Tenth Avenue and West 15th Street, a dangerous intersection that exposes pedestrians crossing West 15th Street on the west side of Tenth Avenue to cars arriving at high speed from the West Side Highway.

We recommend that the intersection of Tenth Avenue and W. 15<sup>th</sup> Street, a dangerous intersection that exposes pedestrians crossing W. 15<sup>th</sup> Street on the west side of Tenth Avenue to cars arriving at high speed from the West Side Highway, be addressed by the equipping of the west bound turning movements from Tenth Avenue onto W. 15<sup>th</sup> Street with a split phase signal.

## **Air Quality**

No comments.

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<sup>2</sup> DEIS, Chapter 12-2

<sup>3</sup> DEIS, Chapter 13-1

## **Greenhouse Gas Emissions and Climate Change**

Given the advent of Hurricane Sandy in October 2012 and damage done to the Hudson River Park area, we hope that the applicant and the HRPT will continue giving sufficient consideration of the impact of rising sea levels on this project.

## **Noise**

No comments.

## **Neighborhood Character**

Please see our comments in the “Land Use, Zoning, and Public Policy” section.

## **Construction Impact**

The sheer scope of the project will have an unavoidable impact on local residents, businesses as well as students and visitors to the Hudson River Park. In addition the project is being constructed on a major traffic artery affecting traffic and congestion in the area.

Many of the impacts were found to be within acceptable CEQR guidelines vis-à-vis the permitted development. However, in that the developer is benefitting from the zoning change, there should be some benefit to the community during the extended construction period, perhaps mitigation and enhancement of pathways around the site, and limiting of construction take-over of lanes on major traffic artery.

## **Public Health**

No comments.

## **Alternatives**

No comments.

## **Mitigation**

### **Land Use, Zoning, and Public Policy**

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Construction.

We recommend that a construction task force be established, with representatives of all stakeholders, which will meet at least monthly throughout the constructions phase of the project and must be in place prior to the commencement of demolition.

**Unavoidable Adverse Impacts**

No comments.

**Growth-Inducing Aspects of the Proposed Actions**

No comments.

**Irreversible and Irretrievable Commitment of Resources**

No comments.

Thank you for considering these comments.

Sincerely,



Corey Johnson, Chair  
Manhattan Community Board 4



J. Lee Compton, Co-Chair  
Chelsea Preservation & Planning



Brett Firfer, Co-Chair  
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John Doswell, Co-Chair  
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cc : Madelyn Wils, Noreen Doyle, Laurie Silberfeld – Hudson River Park Trust  
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NYS Senator Thomas Duane  
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A.J. Pietrantone – Friends of Hudson River Park