



CITY OF NEW YORK

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West Side Community Board Examines Hudson Yards Environmental Study

Information missing; outrageous assumptions.

Manhattan Community Board No. 4 yesterday submitted to the Department of City Planning and the Metropolitan Transportation Authority its comments and recommendations on the draft analysis of the environmental impacts the City's Hudson Yards Plan will have on Manhattan's West Side. The City's plan includes new commercial and residential development, an extension of the No. 7 subway line, a new football stadium for the New York Jets, and an expansion of the Jacob K. Javits Convention Center.

Yesterday was the last day of the official public comment period for the environmental study, formally known as a draft generic environmental impact statement or "E.I.S.," for the City's controversial plan to redevelop Manhattan's far West Side, roughly between 28th and 42nd Streets. All public comments must be addressed before the study can be finalized. The preparers of the EIS have 45 days to finalize the massive document.

"The implementation of the Hudson Yards redevelopment plan will profoundly affect Hell's Kitchen and surrounding areas," said Walter Mankoff, Community Board 4's chair. "Adequate steps must be taken to properly assess and mitigate the anticipated impacts of the proposed development on our community."

Concerns raised by the Board include:

Questionable assumptions – The air quality, traffic, and construction analyses are based on the assumptions that 70% of Jets fans will take public transportation to the stadium, that the No. 7 subway line extension will be in operation by 2010, and that congestion at one intersection has no effect on any other intersection.

What about the ferries? – The study expects that 8,000 fans are going to take ferries to each football game. Right now, at peak capacity, the ferries between New York and New Jersey can handle barely half that many people. No assessment is given of the capacity of existing terminals, no discussion is provided of how many new ferries would be needed, and no consideration is given to the pollution generated by ferries.

What about the trains and buses? – New Jersey Transit and The Port Authority of New York and New Jersey are planning an additional cross-Hudson rail tunnel and improvements in bus transit to address a growing number of commuters to Midtown traveling from the west. Yet, the DGEIS provides no analysis of NJT train or bus service, or even any analysis of the impacts of additional Lincoln Tunnel traffic on New Jersey streets.

Noise – The analysis of noise, which is mostly from traffic, assumes that everyone will be driving at posted speed limits. When traffic jams, idling, and honking are considered the noise is going to be so bad that sealed windows will be required for every building in the area.

“Hudson Terrace” – Promotional materials used by the Administration and the Jets show a deck over the West Side Highway as an integral part of the stadium, but the EIS doesn’t study it and it’s not included in any of the Hudson Yards land use proposals. Because it is connected to Hudson River Park and covers a major roadway, it could possibly trigger federal environmental review and the reopening of the Hudson River Park EIS.

Power – The EIS shows that new development will require as much electricity as is generated by a mid-sized power plant. Two new electric substations and a new transmission substation will be needed to distribute this power. But the Hudson Yards rezoning plan will make it impossible to locate any of these facilities in the area as-of-right.

Construction – Between 2005 and 2009, the City predicts that construction in the Hudson Yards area will require almost 200,000 truck trips. In 2006, the City expects almost 500 vehicles each day to be traveling to and from construction sites. Almost all of these trucks will be bringing construction materials and rock spoils through tunnels and over bridges. This will be happening at the same time that major construction is occurring in Lower Manhattan. These vehicles will use so much diesel fuel that our air will violate pollution limits. And what will be the effect on the river crossings? We don’t know, because the EIS didn’t study them.

The Board agrees that parts of the Hudson Yards area now zoned for low-density industrial use should be rezoned to allow for contextual expansion of residential and commercial uses in Hell’s Kitchen, but disagrees with the scale of development contemplated by the overall plan.

In an August letter to the City Planning Commission, the Board raised several major concerns with the City’s plan including: excessive density that would allow 70 and 80-story towers to block the waterfront from the City, tremendous risk to City’s finances, major environmental problems with traffic and air pollution, and the unnecessary condemnation of private property that would lead to the direct displacement of 85 households, a family shelter housing at least 290 residents and an estimated 340 businesses and 1,200 to 3,000 private sector jobs.

Two overriding considerations about the plan dominated the Community Board’s deliberations. First is the plan to build a football stadium for the New York Jets just east of the West Side Highway between 30th and 33rd streets. The Board argues the stadium would create traffic nightmares, would deter desirable development and wastes a valuable waterfront development site that would be better used for offices, housing and open space, and for the southward expansion of the Javits Center. Second is the lack of a real plan to create affordable housing.

For a group of 42 volunteers, examining and responding to the Hudson Yards plan and the complex technical information contained in the 7-volume, 6,000-page environmental study has been a Herculean task. The Community Board’s entire 46-page response to the No. 7 Subway Extension – Hudson Yards Rezoning and Development Program Draft Generic Environmental Impact Statement is available online (<http://www.ManhattanCB4.org>) or by request by calling the board’s office.

The Hudson Yards plan and the DGEIS are currently under review by the City Planning Commission. The next step in the public review process will be City Council review.

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