

## DELORES RUBIN

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## CITY OF NEW YORK

## MANHATTAN COMMUNITY BOARD FOUR

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April 14, 2016

Commissioner Howard Zemsky Empire State Development 633 Third Avenue New York, NY 10017

Re: Javits Marshaling Yard

Dear Commissioner Zemsky,

Manhattan Community Board 4 (MCB4) has long requested the creation of a bus garage for the more than 300 Tour and Charter<sup>1</sup> buses that park curbside in our district. We are asking you to dedicate a small portion of the state property located between 33<sup>rd</sup> and 34<sup>th</sup> Streets, Eleventh to Twelfth Avenues in Manhattan, to accommodate such a garage. This garage is critical to support the growth of New York State's travel, entertainment and tourism industries, and equally important, to improving the air quality in our district.

In 2005, the City of New York rezoned the western section of mid-Manhattan (Hudson Yards and Western Rail Yards) from manufacturing to mixed use, with the MTA contributing large properties to the plan. The findings of the Final Generic Environmental Impact Statement (FGEIS) were based on the assumption that a bus garage to accommodate all buses in the district would be built by 2025.<sup>2</sup>

This was a critical assumption because buses parked on many of the parcels in the area, in addition to curbside. As these parcels are developed, bus parking disappears, but new buildings on the site of former parking lots no longer accommodate curbside parking for buses. Between 2010 and 2015, 50% of bus curbside parking disappeared in our district. Farther north, in the vicinity of 57<sup>th</sup> Street, many parcels were rezoned in 2010-2014 for

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https://www.dropbox.com/s/9bb1hhjk24se7dm/Hudson%20Yards%20rezoning%202005%20%E2%80%93%20FGEIS%20%E2%80%93%20Bus%20parking%20garage%20.pdf?dl=0

<sup>1</sup> http://chekpeds.com/wp-content/uploads/2011/01/12-13-2010-MMCCBusSubcommittee-Report-Final1.pdf

<sup>&</sup>lt;sup>3</sup> https://www.dropbox.com/s/8dwbcbbq4sv1t6f/Bus%20Citv%20planning%20presentation.pdf?dl=0

residential development and what used to be a resource for bus parking is no longer available.

At the same time the bus industry has grown rapidly and is poised to grow by 30-50% in the next 30 years. New long distance services like Megabus and Bolt Bus- with over 300 arrival/departures per day- have established curb side terminals, all adjacent to future residential and commercial towers and conflicting with the High Line elevated park, an internationally renowned tourist attraction. <sup>4</sup>

The result is an ever-higher concentration of buses that circle the blocks or idle for hours in illegal parking spaces. Not surprisingly, in Clinton and Chelsea, levels of PM2.5, the most harmful air pollutant, are the third highest in the city at 11.4 micrograms per cubic meter.<sup>5</sup> Air pollution, including fine particles (PM2.5), causes health problems, particularly among the very young, seniors and those with preexisting health conditions. These conditions are no longer tolerable in a district with a massive influx of residents and families with children.

It was our understanding that the Port Authority would be building such a garage. However, all of the plans discussed to date are focused on accommodating New Jersey commuter buses, which have also seen their numbers explode in recent years, a trend that is expected to continue, if not accelerate.

Locating tour and charter buses in New Jersey is not a viable or sustainable option. Customers expect to pick up long distance buses in New York City, at a location served by the subway. For tour and charter buses operators to pick up their customers at Broadway shows or at touristic attractions, they must return to the city during peak hour traffic when there is an eleven-mile long queue of buses waiting to reach the city and the Port Authority, making it impossible for an operator to reliably schedule a pick up.

Governor Cuomo announced last month the expansion of the Jacob Javits Convention Center and relocation of the truck marshaling yard - presently located at 33/34 Street, between Eleventh and Twelfth Avenues - to the north of the property. We anticipate that this parcel will be re-developed once the current yard has been relocated.

With all parcels in the west side of mid-Manhattan already accounted for and no remaining alternatives, we urge you to include a bus garage in your plans for the redevelopment of the current Marshaling Yard. The garage would use underground floors leaving the great majority of the FAR available for residential and commercial development. Since bus operators are accustomed to pay for parking in other cities, such a parking garage could generate significant revenue. Eliminating authorized curbside parking would guarantee full utilization of the new garage.

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<sup>&</sup>lt;sup>4</sup> https://www.dropbox.com/s/iuq55oxgw7wj6ma/PABT-%20bus%20garage\_final\_v2.pdf?dl=0

<sup>&</sup>lt;sup>5</sup> http://www.nvc.gov/html/doh/downloads/pdf/data/2015chp-mn4.pdf

The location is adjacent to the west side highway and close to the Lincoln Tunnel entrance, thus minimizing bus traffic in the streets. It also is close to the new # 7 Subway Station, convenient for long distance bus travelers. Finally, it would provide a convenient bus connection from the major airports to the Jacob Javits Convention Center.

We look forward to engaging in a constructive dialog on this urgent matter of infrastructure, which is critical to our district residents' health, and to the Travel and Tourism Industry in New York.

Sincerely,

Delores Rubin

Chair

**Christine Berthet** 

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Co-Chair, Transportation

Planning Committee

Ernest Modarelli

Co-Chair, Transportation Planning Committee

Convention Center Development Corporation cc

**Hudson Yards Development Corporation** 

Governor Cuomo, New York State

Commissioner Matthew Driscoll, NYS Department of Transportation

NYC Department of City Planning

NYC Department of Transportation

Hon. Richard Gottfried, New York State Assembly

Hon. Corey Johnson, City Council

Hon. Jerrold Nadler, New York House of Representatives

Hon. Brad Hoylman, New York State Senate

Hon. Gale Brewer, Manhattan Borough President