November 6, 2003

Margaret Forgione Manhattan Borough Commissioner Department of Transportation 40 Worth Street New York, NY 10007

Re: Conversion of West 58th Street to two-way operation

Dear Commissioner Forgione,

We write with concern about DOT's plan to convert West 58th Street from one-way to two-way operation between Eighth and Ninth Avenues as called for in the 1997 Coliseum Redevelopment Project Final Supplemental Environmental Impact Statement (FSEIS) to mitigate project related impacts on traffic in Columbus Circle. As you know, this block has had on-going problems with traffic and congestion and we believe the implementation of this mitigation should be reassessed.

The FSEIS called for two-way operation on 58th Street to reduce the number of vehicles entering Columbus Circle from Eighth Avenue, particularly during PM peak hours, and making turns onto 60th Street from Broadway in order to enter the garage at the development site which has become the Time Warner Center (TWC).

Our primary concern is that existing land use conditions in the Columbus Circle / West 57th Street corridor area differ considerably from what was anticipated at the time the FEIS was prepared. Most significantly, we note the absence of the following development projects from the study's scope:

- The construction of Hearst Organization's headquarters at 959 Eight Avenue. This project is currently underway and will result in a 42-story tower with a total floor area of approximately 723,000 square feet.
- The Durst Organization's rezoning on W. 57th Street between Eleventh and Twelfth Avenues that is intended to result in 1.5-1.65 million square feet of residential, office and light industrial space. A new 58th Street shuttle bus serving future residents and workers is part of this plan.
- Construction by the Brodsky Organization of a 40-story residential tower (containing 134 residential units) at 2 Columbus Avenue.

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- The renovation of the Hudson Hotel at 358-366 W. 58th Street which resulted in 1,000 new guest rooms, several eating/drinking places and multi-functional space.
- The construction of Alvin Ailey American Dance Theater's new facility at north west corner of 55th Street and Ninth Avenue. This project is currently underway and will result in 77,000 square feet of studio, educational and office space.
- The construction of the Gotham Organization's 18-story tower at the south west corner of 55th Street and Ninth Avenue is currently underway. When complete the project will contain 149 residential units and ground floor retail space.
- The construction by Glenwood Management of a high-rise residential tower occupying the entire Broadway frontage between 64th and 65th Street is currently underway.

We also note that the study's traffic analysis only counted vehicles bound for the development's garage and did not thoroughly consider the impact of added congestion caused by loading and unloading activities associated with cars, taxis, service trucks and other vehicles at the site, but unlikely to use the garage. Similarly, the potential beneficial impact of passenger pick-up and drop-off at the Columbus Circle entrance on the queue turning onto 60th Street from Broadway was not studied.

As prescribed, the conversion of 58th Street would result in two eastbound travel lanes and one westbound lane with a parking lane along both curbs. This would make permanent a condition that has contributed to traffic and congestion problems on the street since the northern half of 58th street was closed to accommodate the construction staging area for the TWC complex. This experiment has shown that two eastbound lanes are already insufficient to handle vehicles using this major crosstown alternative to 57th Street, as well as those with 58th Street destinations.

The conversion would exacerbate problems in front of the Hudson Hotel where double and triple parking now requires the use of the entire width of 58th Street for through traffic to pass. Last year, DOT recognized the inadequacy of the Hudson's loading zone to accommodate the high volume of guests and deliveries it often receives and agreed to install a taxi stand on the south side of the 58th street from the hotel's loading zone to Ninth Avenue to help address the problem. The conversion would effectively reduce vehicle storage space in front of the hotel, which we already know is insufficient, leaving little room for through traffic to pass and causing more congestion in the intersection rather than preventing it. And, it would likely result in double parking on the north side of 58th Street, as vehicles stop to discharge passengers bound for the hotel.

Vehicles turning onto 58th Street from Eighth Avenue cannot be limited to those heading for TWC and it cannot be assumed that the TWC will not attract vehicles arriving from the west. The impact of other destination-bound vehicles taking the turn at Eighth Avenue should be anticipated, as should the impact of vehicles turning against traffic to enter any of the many curb cuts on the block that serve receiving areas, garages, local businesses and residences.

Finally, the FSEIS provides no assessment of the impact the mitigation plan would have on traffic at 58th Street and Ninth Avenue, where traffic already backs up Ninth Avenue waiting to

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turn eastbound onto 58th Street and where westbound traffic on 58th Street will be required to turn left across heavy traffic to proceed down Ninth Avenue. The cure seems worse than the disease.

In sum, any change to traffic flow or parking regulations on 58th street between Eighth and Ninth Avenues must take these considerations into account. We must also be assured that other area developments have adequately considered the relative impact of such a change. We repeat our request that DOT reassess its decision to convert West 58th Street to two-way operation.

Thank you for your consideration of this request.

Sincerely,

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Walter Mankoff Chair Manhattan Community Board No. 4

Anna Hayes Levin Co-Chair Clinton/Hell's Kitchen Land Use Committee

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Simone Sindin Co-Chair Clinton/Hell's Kitchen Land Use Committee

 cc: Hon. C. Virginia Fields, Manhattan Borough President Hon. Gale Brewer, City Council Member V. Chakrabarti, DCP Manhattan Community Board Nos. 5 & 7 Hudson Hotel Other 58th Street buildings and businesses