

**Remarks by Walter Mankoff, Chair of Manhattan Community Board No. 4
Comment/Assessment/Options: The Hudson Yards Plan
Steven L. Newman Real Estate Institute
Baruch College - CUNY
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Good morning everyone.

I am delighted to be here today representing Manhattan Community Board No. 4.

For those not familiar with us, our district runs from 14th to 60th Streets along the Hudson River. Our Eastern boundary is 6th Avenue up to 26th street and 8th Avenue the balance of the way to Columbus Circle.

The City's Hudson Yards project, including the adjoining Stadium and Convention Center projects, directly involves about 25 percent of Board 4's land area. It will have a massive impact on our entire community and its effects will be felt far beyond our borders.

I have been asked to touch on three main topics in my remarks this morning:

- " The community and the EIS
- " The possibilities of mitigation
- " Our willingness to accept negative impacts of projects benefiting the City as a whole.

Let me dispose of the last issue first.

Board 4 currently plays host to the Lincoln Tunnel, the Port Authority Bus Terminal, Penn Station, the Convention Center, 3 sanitation facilities, the main post office and the Morgan Annex among an endless list of other facilities. To ask if we accept negative impact to help our City is to ask the paradigm of rhetorical questions.

And what's more, as good citizens, we have offered to shoulder even greater burdens. We support genuine expansion of the Convention Center which blocks access to the river while doing nothing to enhance our community. We support a rezoning of Hudson Yards and its development to provide for future City housing and office needs. But, we do draw a line.

We believe that our community has the right to help determine more meaningfully whether a project that will injure us genuinely helps the City. The present ULURP system does not give us this right. And we believe that full public and legislative review must be a part of the process. Having grand schemes emerge from behind the closed doors of City Hall is wrong.

We support major change for Hudson Yards but do oppose some specific parts of the City plan. We oppose the chilling density of the present Hudson yards plan and its wall of 70 and 80 story towers along 11th Avenue. We support rational, human-scaled development more in line with actual future City need. This means 30 or 40 story buildings with greater residential emphasis. We support shifting the development orientation from North-South to East-West as in the alternate plan developed by the Hell's Kitchen Neighborhood Association and carried to even greater degree by the Newman Institute plan itself.

Hell's Kitchen is a vibrant, historic neighborhood with a diverse population and workforce and many businesses small and large. It is in the City's and the community's interest to build on that character rather than destroy it. This calls for modification of the City plan to provide less demolition, less condemnation and more building of permanent, affordable housing.

Also high on our priority list is opposition to the stadium. Lining Woody Johnson's pockets is not a legitimate City need. It does not justify the traffic jams and environmental problems a stadium will cause in our neighborhood. Nor does it justify the financial risks for the City.

Having established our bona fides, let me turn to the issues of the EIS and mitigation.

My concept of a proper EIS, and the function it would serve, differs widely from the City. I dream of a world in which the EIS is done on time, is done completely and correctly, and most important, the finished EIS guides the City's adoption or modification of a project. Those of us who have lived with the Hudson Yards EIS know how far we are from that ideal world.

Like most of its genre, the EIS for Hudson Yards is a bit like a historical novel. There is a solid grounding of fact to which highly selective fiction is added. I think this is a fair description.

Consider this example. To prevent the Grand Central subway station from being overwhelmed by the traffic from the 7 line extension it is necessary to first complete the 2nd Avenue line. To provide favorable results, the EIS waves its wand and assumes the 2nd avenue line is built.

Look at a second example. An ever increasing proportion of New York's office work force is living in Hew Jersey and straining commuter bus and rail lines. Traffic from New Jersey is expected to grow substantially in coming years to meet the needs of the new office towers and to overwhelm the system. To avoid being unduly negative, the EIS again waves its wand and pretends New Jersey's share remains at 1990 levels

Let me cite a final example. The presentations flowing continually from City Planning, EDC and the Jets make it clear that the Hudson Yards rezoning is intended to dramatically change the neighborhood. Indeed, they claim that this need for change is the major *raison d'etre* for the plan. Yet, what does the EIS say in its chapter on socio-economic impact? Strange as it may seem, it says in relation to secondary displacement that the character will not be affected significantly by the plan. It says the character has been changing prior to Hudson Yards implementation and will merely continue to do so.

Defective as it is, the Hudson Yards EIS all we have to work with. It is a monumental work with thousands of pages, 28 chapters and 36 appendices. In my allotted time, I can touch on only a few of the myriad of EIS topics. Let me comment briefly on the three or four with the most egregious impact on our community

The EIS could not avoid its highly critical comments on the noise and chemical pollution the plan will generate much as it might have wished to do so. The mitigation proposed - working and living behind sealed double glazed windows -- makes that clear. The EIS thinks in terms of decibels and particulate levels. We think in human terms. What will be the impact on the child with asthma or the seniors with emphysema? Or even on those of us in robust health? What will happen when you have to leave your hermetically sealed environment and go outdoors? How will you enjoy the parks and boulevards or the streets with sidewalk cafes that our planners promise us? Will the latest

fashion trend include matching ear muffs and gas masks?

Even today, our community suffers from pollution that seriously affects the quality of life. In addition to the pollution generated by already heavy traffic, fumes and noise from illegally idling buses and other vehicles permeate homes in Hell's Kitchen endangering health of residents. There is a desperate need for off-street bus facilities that will grow geometrically if Hudson Yards is adopted. The EIS cites the need but there is no plan in place to build the mitigating facility nor does it seem to have high priority

A second environmental problem we face is traffic. Anyone living or working in our area is an expert on traffic jams and gridlock. It is part of our daily lives. We know how difficult it is to cross streets while avoiding turning vehicles. And the accident rate in our community tells us our fears are sound. The EIS makes clear that the problem will get much worse. Pedestrians will be bumping into each other. Vehicle tie-ups will be legion, with as much as 5 minutes delay at an intersection. In fact, the EIS says some delays were so long they could not be measured. And once again the EIS puts the most favorable spin on the problem by ignoring the cumulative impact of one intersection on another.

And we are not taken in by the self-serving claim that 70% of Jets fans will arrive by mass transit, a number that exceeds by far the experience at any other urban stadium. And we surely don't accept the EIS prediction that there will be no tie-ups on major streets on football game days.

The proposed traffic mitigation cannot be taken seriously. Clearing a curb lane in midtown to ease traffic flow is something that will not happen. There is always an emergency vehicle, taxi, limo, illegal car or delivery truck looking for curb space. Add to this street construction, TV or movie filming and the problem is worse. And all it takes is one vehicle on a block to effectively eliminate the extra lane.

The other proposed mitigation is to modify signal timing. Aside from the fact that only tiny, incremental changes are possible the changes usually make it more difficult for pedestrians to cross the streets. Our community has a large number of elderly or handicapped individuals who find it difficult enough at present to cope with the problem of getting to the other side of the avenue.

The only real traffic mitigation possible is to reduce the number of vehicles trying to enter or move about our area. The City should maintain the present rule not requiring parking spaces in new construction below 96th Street. It should eliminate the stadium and reduce the density proposed for the area. Increasing the ratio of residential to commercial construction would also help ameliorate traffic problems.

A third area of concern to the community is in the failure of the Hudson Yards plan to provide sites for needed infrastructure or to consider the cost of these facilities. Among such items cited by the EIS as needed are:

" A transmission substation and 2 electric substations to supply the area with needed electric power.

" An elementary school.

" A firehouse.

In addition, numerous items of infrastructure cited in the EIS have dedicated sites but are either not planned or their cost has not been provided for. Included are water and sewer mains, ferry facilities, decking over route 9A and various improvements in bus and subway facilities.

Worst of all, the EIS contains absolutely no estimate of additional need for police services. The plan calls for a

stadium, an expanded convention center, two new subway stations, a new hotel, and zoning that will allow the creation of multiple landmark skyscrapers. Where is the anti-terrorism protection for all of this coming from? We asked City Planning, and their response was "The NYPD... has stated that with continued adjustment in deployment of personnel and equipment, there would be no significant adverse effects on its operation." That's the entire response. No discussion of need for new staff, new equipment, new facilities, nothing, even though they're planning a massive new business district and huge public facilities.

My fourth and final point relates to improving the quality of life of the present residents of our community. Some in our community, thankfully only a few, want no redevelopment to take place. Others want only low scale development. The Community Board supports very substantial development and a density that probably exceeds what we would consider ideal. We took this position not only because we recognized the City's need, but for selfish reasons as well. We wanted some things for our community that could not be provided without substantial development to defray the cost.

In addition to seeking protection for 9th Avenue - the main street of Hell's Kitchen - we desperately need parks and open space. Community Board 4 is among the lowest districts in the City in terms of available park space. It is urgent that adequate provision be made early on to provide these spaces and once again the plan does not meet the test. The City is trying to get developers to set aside space by offering them FAR bonuses but this seems an unworkable approach. In addition, the City plan not only fills the planned parks with noise and pollution but with sun-blocking shadows from the wall of skyscrapers.

We seek one other thing for our community, something very important to us. And that is an adequate supply of permanent, affordable housing to balance the large number of market rate units expected to be built over the years. Unless this is done the character of our neighborhood will change and we will lose our diversity. We want a community where lawyers and librarians, brokers and busboys can live side by side as they do now.

I recognize that this morning I have strayed at times from the academic path to the path of advocacy. That is a role my colleagues in the community have chosen for me. I offer no apologies.

Thank you.

