October 11, 2020

James Patchett
President & CEO
NYC Economic Development Corporation
One Liberty Plaza
New York, NY

Dear Mr. Patchett,

The Hudson River Park Advisory Council (AC) was established by the 1998 Hudson River Park Act to advise and make recommendations to the Hudson River Park Trust’s (HRPT) Board of Directors on matters regarding the planning, design, construction and operation of the Park.

Over the past 30 years, this once derelict industrial waterfront has been converted into a $1.3 billion asset that is now the longest waterfront Park in the nation. The AC supports NYC EDC’s planned expansion of the NYC ferry service, but we are concerned that the expansion of operations to the Midtown West Ferry Terminal at Pier 79 will impact the Hudson River Park in a variety of ways. The most important of which is the potential for long-term wake damage to the Park’s in-water infrastructure, human powered boating and environmental restoration efforts.

The Hudson River Park is a designated estuarine sanctuary and one of HRPT’s primary missions is the restoration and protection of this unique aquatic resource. HRPT will soon be releasing a decadal update of the Estuarine Sanctuary Management Plan and embark on the first restoration project in the Tribeca portion of the sanctuary. In addition, the Park has the highest density of people powered boathouses in the country and hundreds of millions in public and private funding have been invested to stabilize, restore and rebuild the Park’s in-water infrastructure from bulkheads and piles, to marinas and moorings.

The NYC Ferries were designed with low wake hulls; however, every vessel displaces water and causes wakes. Like the slow drip of water on the stone, these wakes will eventually affect the Park’s infrastructure, small boating community, and natural resources. Steps need to be taken to protect the area and community as the NYC Ferry service expands. A simple solution would be to establish an operating protocol that keeps NYC Ferries at least 100 yards from the pierhead in the Hudson River Park.

We understand that ferry operators strive to minimize both operating time and fuel consumption. However, operating a little further from the shore would have a negligible impact on ferry operators bottom line, but would be a major benefit to our reemerging recreational waterfront and natural systems. Given the metamorphosis of our Harbor, common sense would indicate that it is time for the involved government
agencies to support commerce and ferry operations while protecting the gains we have made in resurrecting our waterfront and the health of our waterways.

Both NY Waterway and the Staten Island Ferry use Transas to monitor their ferry routes. The system could electronically track NYC Ferry vessels operating on the West side waterfront and record if a vessel operates too close to the Park. The recorded activity is available for review for several days. Monitors for the system could be located at both the NYC Ferry dispatch office and HRPT’s security desk.

Service expansion is scheduled for 2021 and we have been informed that NYC EDC will be establishing no wake zones in consultation with the US Coast Guard (USCG), New York State Department of Environmental Conservation (NYS DEC), and US Army Corps of Engineers (USACE), all of whom have been copied on this letter.

The Hudson River has ample room for ferries to operate in a manner that protects the hundreds of millions of public and private investments that have been made to stabilize and rebuild deteriorated waterfront infrastructure, enhances the safety of recreational boaters and supports ongoing efforts to restore and protect New York City’s first estuarine sanctuary. The Advisory Council respectfully requests NYC EDC establish and enforce a ferry safety zone precluding NYC Ferry operations within 100-yards of the pierhead of the Hudson River Park to reduce the long-term impacts of ferry wakes. We look forward to hearing from you on the matter.

Sincerely,

Jeffrey LeFrancois
Chair

Cc: Stephen Zahn, Regional Director, NYS DEC
Joseph Seebode, Deputy Chief Engineer, US Army Corps of Engineers
Captain Andrew McGovern, Steering Committee, Harbor Safety, Navigation and Operations Committee, Maritime Association of the Port of NY/NJ
Captain Jason Tama, Chief Waterways Management, Sector New York, US Coast Guard
Commissioner Basil Seggos, Chairman, Hudson River Park Trust