Chapter 26: Response to Comments on the DEIS

A. INTRODUCTION

This chapter summarizes and responds to all substantive comments on the Draft Environmental Impact Statement (DEIS) for the Pier 57 Redevelopment Project made during the public review period. Comments on the DEIS include spoken or written testimony submitted at the public hearing held by the Hudson River Park Trust (HRPT) in conjunction with the City Planning Commission’s (CPC) Uniform Land Use Review Procedure (ULURP) public hearing on January 23, 2013 as well as written comments submitted during the public comment period, which ended on February 4, 2013. Written comments received on the DEIS are included in Appendix E-1. A transcript of the public hearing can be found in Appendix E-2.

Section B lists the elected officials, city planning commissioners, community boards, government agencies, organizations, and individuals who commented on the DEIS. Section C summarizes and responds to the substance of these comments on the DEIS. The organization and/or individual that commented are identified after each comment. These summaries convey the substance of the comments but do not necessarily quote the comments verbatim. Comments are organized by subject matter and generally parallel the chapter structure of the DEIS. Where more than one commenter expressed a similar view, the comments have been grouped and addressed together.

Where relevant and appropriate, edits related to the comments below, as well as other substantive changes to the DEIS, have been incorporated into the Final Environmental Impact Statement (“FEIS”).

B. LIST OF OFFICIALS AND INDIVIDUALS WHO COMMENTED ON THE DRAFT ENVIRONMENTAL IMPACT STATEMENT

ELECTED OFFICIALS

1. New York State Senator Brad Hoylman, oral comments delivered on his behalf by Jared Chausow, January 23, 2013. (Hoylman)

2. New York State Assemblymember Richard N. Gottfried, written comments dated January 23, 2013. (Gottfried)

3. Manhattan Borough President Scott Stringer, recommendation dated January 16, 2013 and oral comments delivered on his behalf by Lin Zeng, January 23, 2013. (Stringer)

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1 This chapter is new to the FEIS.
COMMUNITY BOARD
4. Community Board 4 recommendation and written comments, dated December 18, 2012. (CB4)

CITY PLANNING COMMISSIONERS
5. Commissioner Irwin Cantor, oral comments delivered January 23, 2013. (Cantor)
6. Commissioner Michelle De La Uz, oral comments delivered January 23, 2013. (De La Uz)
7. Commissioner Anna Levin, oral comments delivered January 23, 2013. (Levin)

ORGANIZATIONS AND INTERESTED PUBLIC
8. Karen Binder, on behalf of Chelsea Piers, written comments dated January 8, 2013 and February 4, 2013. (CP/Binder)
9. Mike Braito, Chelsea Piers, oral comments delivered January 23, 2013. (CP/Braito)
10. Noah Budnick, Transportation Alternatives, oral comments delivered January 23, 2013. (Budnick)
11. Jerry Gluck, on behalf of Chelsea Piers, Principal Traffic Engineer, AECOM, oral comments delivered January 23, 2013, and written comments dated December 11, 2012 and January 31, 2013. (CP/Gluck)
13. Sean Kelliher, written comments dated February 3, 2013. (Kelliher)
14. Jesse Masyr, on behalf of Chelsea Piers, oral comments delivered January 23, 2013. (CP/Masyr)
15. Eldon Scott, President, Urban Space Management, oral comments delivered January 23, 2013. (Scott)
16. David Tewksbury, Executive Vice President, Chelsea Piers, written comments dated February 4, 2013. (CP/Tewksbury)
17. Pamela Wasserstein, Tribeca Enterprises, oral comments delivered January 23, 2013. (Wasserstein)

Appendix E-3 includes two alternative access plans submitted by Chelsea Piers (on September 26, 2012 and February 4, 2013) to HRPT and the applicant for their review and consideration. These alternative access plans are discussed below in Comment 28. The summary below also includes questions from correspondence between Department of City Planning staff (DCP) and HRPT during the CPC’s review of the proposed project.
C. RESPONSE TO DEIS COMMENTS

PROJECT DESCRIPTION

Comment 1: The proposed project supports sound city policies, incorporates community input, and promotes goals defined in the Hudson River Park Trust Act. The current plan for a public marketplace, as well as the other proposed uses on the site, are highly appropriate and carry significant public benefits. The addition and improvement of park space around the perimeter and on the roof of the Pier create accessible community spaces for public events and performances, as well as passive recreation and enjoyment of scenic views of the waterfront. (Stringer)

The proposal to convert Pier 57 into a new and noteworthy cultural and commercial destination will be a benefit to Hudson River Park and the surrounding communities. I wholeheartedly support the plan. (Gottfried)

We believe that the redevelopment of Pier 57 is a crucial element in the ongoing revitalization of the Hudson River Park and is an appropriate and excellent addition to the park and the community. Further, we believe that the uses proposed at Pier 57—cultural, food, recreation, and small and mid-sized retail—are complementary to the High Line, and will only enhance the experience of those visitors to the High Line, Hudson River Park, and Manhattan’s West Side. (Hammond)

The Board strongly supports the redevelopment of Pier 57 and believes that the proposed project would be an excellent addition to Hudson River Park and to the community. (CB4)

I strongly support the proposed Pier 57 redevelopment. (Hoylman)

Response: Comments noted.

Comment 2: I urge the CPC to approve these applications, subject to the conditions set forth in Manhattan Community Board 4's December 18th, 2012 letter to the Commission. However, I am concerned the development envelope and uses that would be permitted if the discretionary actions were approved would enable as-of-right development perhaps by a future developer that would have significant adverse impacts on the surrounding community. I am also concerned that M1-5 zones allow hotel and “big box” retail uses. And while the Hudson River Park Act does not currently allow such uses, I echo CB4’s stated desire for an additional measure of protection from such uses in the future. Likewise, while the aforementioned restriction on “big box” retailers included in the lease is a positive step, there must be an additional restriction on this use that is not predicated on occupancy of the site by the applicant. (Hoylman)

CB4 strongly supports the redevelopment of Pier 57 and believes the project would be an excellent addition to Hudson River Park and to the community.
However, we request the following controls to protect against bulk, height, and uses allowed as-of-right under the proposed M1-5 zoning district:

1) A deed restriction or similar device to limit the floor area ratio (FAR) to the 2.23 the applicants are requesting for the proposed development. (CB4)

2) A deed restriction or similar device to preclude hotel uses. We understand that the current proposal does not include a hotel and that the Hudson River Park Act currently does not permit hotels, but since the proposed M1-5 zoning permits hotels as-of-right we would greatly prefer one more safeguard against this use that the community strongly opposes on pier in Hudson River Park. (CB4)

3) A deed restriction or similar device should be placed on Pier 57 to preclude “big box” retailers or discounters. (CB4)

While I support the redevelopment project at Pier 57, the community has expressed concerns on density and potential hotel and big box uses permitted under the proposed M1-5 zoning district. If hotel and big box uses and greater density are realized, then they would certainly detract from the park’s open space and recreation purposes, and should be discouraged. Pier 57 fortunately is governed by several regulatory safeguards that will prevent any significant changes to what is currently being proposed. (Stringer)

Could you address for us the reassurances that will be available in the arrangements between the Trust and the developer on the points that concern the community board; specifically FAR, hotels, and big box retail? (Levin)

I am satisfied with HRPT’s promise to not allow a big box store, which will be achieved via the lease with the applicant. (Gottfried)

Response: With respect to the FAR allowed on the site under the proposed zoning, the potential for the proposed project to achieve substantially more than 2.23 FAR is limited by the historic character of the structure. Because the pier is listed on the State and National Register of Historic Places (S/NR), the review process with the State Historic Preservation Office (SHPO) greatly restricts the height and bulk of any additions on the building. In addition, the project is seeking federal historic preservation tax credits to rehabilitate Pier 57, which are subject to a stricter standard of review by the National Parks Service.

Land uses on the project site are governed both by the underlying zoning and the Hudson River Park Act. With respect to hotel use, such use is not permissible under the Hudson River Park Act. Although HRPT is exploring the possibility of amending the Hudson River Park Act to allow a wider range of commercial uses, HRPT and the applicant have no intention of including a hotel in the development of Pier 57, in part because the historic structure does not lend itself to hotel use. Moreover, the 49 year lease between HRPT and the applicant would prohibit hotel use. With respect to big box use, such use is
prohibited by the Memorandum of Understanding (MOU) between the applicant and HRPT, and that prohibition would be contained in the lease.

**Comment 3:** What signage is proposed as part of the project? (Levin, DCP)

**Response:** A signage plan has not yet been developed. However, all planned exterior signage would comply with applicable regulations and would be subject to review by HRPT and the New York State Historic Office of Parks, Recreation and Historic Preservation (OPRHP). As stated in Chapter 7, “Historic Resources,” the proposed project would include a new sign at the headhouse entrance and would also preserve the existing sign on the building’s façade.

**Comment 4:** While the DEIS states there is a 141 slip marina, it totally fails to describe the intended operation of the marina. Will it only be used for private boats, will there be charter boats, will there be dinner boats? (CP/Masyr)

**Response:** There is no intention to have large passenger, dinner boat, or charter vessel operations in the proposed project’s marina. The size of boats at the marina would be limited by the existing shallow water depths and any future proposal for such vessels would require environmental review by HRPT.

**Comment 5:** The upland area of Pier 58 is now being slated for use as an access road leading to the circulation road in front of Pier 57. This land, located between two commercial uses, could be a beautiful green park space; instead, it’s a two-lane asphalt roadway. (CP/Masyr)

**Response:** In addition to including a circulation road along the Hudson River Park waterfront esplanade from West 17th Street to West 14th Street, the project would add approximately 2.5 acres of open space to Hudson River Park on the pier’s rooftop and around its perimeter. In particular, new public walkways parallel to the existing bulkhead would extend to the north and south of the headhouse, substantially expanding the currently limited public circulation space along the bulkhead. The new public walkways would be designed with treatments compatible with Hudson River Park.

**Comment 6:** We understand that Spirit is in discussions with Pier 57 to relocate Spirit’s four dinner cruises to Pier 57. These four vessels have a total capacity of 1,700 guests. One of these vehicles or large charter boats could generate five to ten times the peak marina volumes claimed in the DEIS. (CP/Braito)

**Response:** As stated by counsel for the applicant at the public hearing and confirmed in writing to the CPC, the applicant has not had any discussions with Spirit Cruises regarding their becoming a tenant at Pier 57; such an operation is not part of the project and therefore is not assessed.
Comment 7: We need to understand what other uses are proposed, or if there are potential events that can take place, public or private. (CP/Braito)

Response: Chapter 1, “Project Description,” provides a table summarizing the proposed program and descriptive text about the proposed uses and the expected nature of the events at the proposed project.

Comment 8: The ultimate lease with the developer should specifically prohibit transient public parking and mandate that any operator of the parking facility be required to post a sign stating, “No transient parking permitted, accessory use only.” (CB4)

Response: Public parking is not allowed at Pier 57 under the Hudson River Park Act. The applicant has agreed to install a sign that would be prominently displayed at the garage’s entrance to discourage public parking. The sign would indicate that parking is reserved only for the owners, occupants, employees, customers, or visitors of the pier.

Comment 9: Chelsea Piers supports the development of Pier 57. However, the scope of the project has still not been adequately defined to assess the potential adverse impacts. Will there be banquets, special events, large passenger or charter boats? Unlike the prohibition on big box stores, there is no lease restriction being proposed to prevent such uses, which are potentially significant traffic generators. (CP/Binder)

Response: As stated above, Chapter 1, “Project Description,” provides a table summarizing the proposed program and descriptive text about the proposed uses and the expected nature of the events at the proposed project. A maximum size special event is accounted for in the EIS analyses. As noted in the response to Comment 4, there is no intention to have large passenger, dinner boat, or charter vessel operations in the proposed project’s marina. The EIS analyzes and discloses the impacts of the reasonable worst case program and event scenario for public review. With respect to banquet uses, such use is prohibited by the MOU between the applicant and HRPT, and that prohibition would be contained in the lease. The lease, like the MOU would also prohibit tenancies or uses that consist primarily of trade shows and event businesses.

Comment 10: Will there be a bus stop serving Metropolitan Transportation Authority (MTA) buses or tour buses? (CP/Binder)

Response: There is no New York City Transit (NYCT) bus stop proposed at Pier 57. With respect to tour buses, the frontage road has been designed to accommodate intermittent tour bus activity.
Comment 11: We enthusiastically support this project and look forward to the opportunity to create and facilitate a retail community marketplace for small business owners and entrepreneurs to thrive in Manhattan. (Scott)

Response: Comment noted.

Comment 12: We are very proud to support the Pier 57 Redevelopment project, and we look forward to participating in the establishment of what we believe will be an important cultural hub for the neighborhood and for New York. (Wasserstein)

Response: Comment noted.

HISTORIC AND CULTURAL RESOURCES

Comment 13: We are concerned that the head house roof is to be raised over the north end and that the existing light structure there, clearly visible from highway and the park walkway to the north, is to be replaced by a banal modern one. The light structure is significant in that it is the only remaining feature that recalls that the pier did not stand alone but was part of a group of major passenger and freight piers, especially the present Chelsea Piers to the north. (CB4)

Response: The “light structure” on the north headhouse rooftop is not original to the pier and was not identified in the S/NR nomination form as an element contributing to the historic character of the pier. However, portions of this structure may be retained as part of the proposed project, and the west façade of the structure would be restored. As discussed in Chapter 7, “Historic and Cultural Resources,” modifications to the Pier 57 structure require consultation with OPRHP, and the project is seeking federal tax credits to rehabilitate Pier 57 to the Secretary of the Interior’s Standards for Rehabilitation of Historic Properties. While the pier would undergo some alterations as part of the project, these changes would not adversely affect the characteristics that make the pier eligible for listing on the S/NR.

WATER AND SEWER INFRASTRUCTURE

Comment 14: We believe that some amount of stormwater capture retention should occur in this project for use in heating, ventilation, and air conditioning (HVAC) equipment, gardening, and cleaning, as that would diminish the project’s reliance on the city’s drinking water supply. (CB4)

Response: The applicant intends to incorporate a number of green design initiatives into the proposed project, including stormwater reuse for landscaped areas on the building's rooftop areas and throughout the project where feasible. The applicant also intends to explore ways to re-use retained stormwater for cleaning purposes and in the planned HVAC equipment.
SOLID WASTE AND SANITATION SERVICES

Comment 15: The DEIS does not say anything about recycling within the project or specific areas in which collected recyclable materials could be stored before being picked up. Nor does it mention composting for garden materials and possibly for food. (CB4)

Response: The proposed project would comply with the New York City Recycling Law, which requires that both the Department of Sanitation (DSNY) and commercial carters collect certain designated recyclable materials and deliver them to material recovery facilities for sorting and recycling. The proposed project would include waste management areas for the sorting and storage of solid waste and recyclables within the easternmost caisson and ground-floor. The proposed project would incorporate a number of green design initiatives, most notably, the re-purposing of shipping containers and other reclaimed industrial objects as design elements throughout the property. The applicant would also work with its future tenant partners to facilitate recyclables management and to develop and adopt composting and responsible organic waste handling programs.

ENERGY

Comment 16: The project should study the possibility of installing solar voltaic collection devices on the roof possibly instead of the wisteria clad trellises currently in the design, as this would reduce the projected demand for energy. (CB4)

Response: Because Pier 57 is listed on the S/NR and is seeking federal tax credits, the project would be required to be built to the Secretary of the Interior’s Standards for Rehabilitation of Historic Properties. Therefore, the design intent for the rooftop additions, including the proposed shade structures, is to create minimally intrusive new elements and provide for an attractive public open space. The proposed project would incorporate several energy efficiency measures, including the use of high efficiency HVAC systems, efficient lighting and appliances, and high efficiency fixtures, as well as maximizing interior daylighting using the existing operable vertical lift doors and maximizing opportunities for natural ventilation and passive cooling.

TRANSPORTATION

Comment 17: The proposed vehicular access plan will improve flow of traffic and increase safety in and around the Pier. Proposed speed tables, lights, and a new pedestrian walkway will increase efficiency and help reduce potential conflicts between vehicles, pedestrians, and cyclists. Locating the taxi stand in a separate
area than the Pier’s frontage further adds to the circulation efficiency and safety around the project site. (Stringer)

Response: Comment noted.

Comment 18: Has a traffic study been conducted? (Cantor)

We respectfully request a full and honest evaluation of the traffic volumes and the real impacts before allowing this project to proceed. (CP/Gluck)

Response: The Transportation Chapter of the EIS includes detailed analyses of the project’s potential traffic, parking, pedestrian, transit, and safety impacts. The analyses were performed in accordance with the City Environmental Quality Review (CEQR) Technical Manual guidelines and have been reviewed by New York State Department of Transportation (NYSDOT) and New York City Department of Transportation (NYCDOT).

Comment 19: The traffic issues associated with the redevelopment of Pier 57 have been among the most difficult to resolve. CB4 believes that the current transportation proposal successfully addresses the community’s concerns and is grateful for the applicant’s diligent attention to these issues. (CB4)

Response: Comment noted.

Comment 20: We recommend that the intersection of Tenth Avenue and West 15th Street, a dangerous intersection that exposes pedestrians crossing West 15th Street on the west side of Tenth Avenue to cars arriving at high speed from the West Side Highway, be addressed by the equipping of the westbound turning movements from Tenth Avenue onto West 15th Street with a split phase signal. (CB4)

Response: Community Board 4 suggested a “split phase” at the Tenth Avenue and West 15th Street intersection that would include a leading pedestrian interval (LPI) for the west crosswalk across West 15th Street, which conflicts with Tenth Avenue traffic turning left onto West 15th Street to access Route 9A. An LPI would allow pedestrians to start crossing the street in advance of turning vehicles, giving pedestrians a partially protected crossing. This “head start” also can increase the likelihood that motorists would yield to pedestrians in the crosswalk.

While the proposed development would not result in any significant adverse traffic impacts at this intersection, in response to Community Board 4’s request, the Trust’s transportation consultant has initiated discussions with NYCDOT regarding the suggested improvement.
**Comment 21:** The intersection at West 17th Street and Route 9A, the principal entrance to Pier 57, is already operating at a failed level of service, and even with the project improvements the traffic flow still fails. (Masyr)

Chelsea Piers is concerned about the 17th Street intersection, which is the sole exit from Chelsea Piers and the proposed principal entry for Pier 57. It should be noted that the existing 17th Street intersection gets an “F” service rating. Adding Pier 57 traffic to this intersection is not going to improve the level of service for the Pier 57 development. (CP/Tewksbury)

Failing traffic operations conditions are projected for the westbound West 17th Street approach to Route 9A. Long delays on the westbound West 17th Street approach (more than two minutes) could adversely affect safety and operations on Route 9A and the bikeway and constrain the egress movement from Chelsea Piers and the entry movement to Pier 57. Long delays on the westbound West 17th Street approach could result in drivers entering the intersection at the end of the yellow phase and proceeding across Route 9A even when storage space in the circulation road does not allow. As a result, there is the real potential for backups in the entrance to the circulation road that could block traffic on Route 9A and Chelsea Piers egress. The operational analysis is really a theoretical analysis and really doesn’t fully reflect the safety implication of this type of situation. (CP/Gluck)

It is important to note a statement in the 2000 *Highway Capacity Manual*—the methodology used in the DEIS for traffic analysis. It indicates that “when delay is already high, and demand is near or over capacity…. the delay may increase rapidly with small changes in demand.” This confirms that any underestimation of Pier 57 traffic volumes could result in a significant worsening of projected traffic condition that would affect Route 9A, West 17th Street, Chelsea Piers egress, and Pier 57 entry. (CP/Gluck)

How would Chelsea Pier traffic be impacted by Pier 57 traffic—is it possible that peak volumes would be staggered? (DCP)

**Response:** Projected conditions at the Route 9A/West 17th Street intersection during the five analysis peak hours are summarized in Chapters 14 and 22 of the EIS. The northbound, eastbound, and southbound approaches of this intersection would operate at acceptable levels of service under the With Action condition and would not require mitigation. The westbound approach of this intersection would operate at Level of Service (LOS) E or F under the Existing and No Action condition; however, with the addition of an exclusive westbound right-turn lane as a project improvement and implementation of proposed signal timing mitigation, the westbound approach on West 17th Street would operate with less delay in the With Action/Mitigated condition (with the project) than in the No Action condition (without the project).
The analysis results for the 2015 With Action Condition and 2015 Mitigated Condition of the Route 9A and West 17th Street intersection are compared to the 2015 No Action Condition in Tables 14-28 and 22-2 of the EIS. The tables show the following:

- During the Weekday Midday peak hour, the westbound West 17th Street approach would improve from LOS F in the No Action condition to LOS E as a result of the proposed project.
- During the Weekday PM peak hour, the westbound West 17th Street approach would remain at LOS F but delay would be decreased by 55.2 seconds.
- During the Weekday Evening Pre-Event peak hour (with the proposed mitigation), the westbound West 17th Street approach would remain at LOS F but delay would be decreased by 2.7 seconds with the proposed project.
- During the Saturday Midday peak hour, the westbound West 17th Street approach would remain at LOS F but delay would be decreased by 19.2 seconds.
- During the Saturday Evening Pre-Event peak hour, the westbound West 17th Street approach would remain at LOS E but delay would be decreased by 2.7 seconds.

Also, the analysis results show that the LOS for the Chelsea Piers exit driveway would remain unchanged for all peak hours as a result of the proposed project. All Highway Capacity Software (HCS) files for the analyzed intersections, including this one, were reviewed by NYCDOT.

**Comment 22:** What assumptions does the EIS make about use of the marina and the generation there, and what assumptions are made about special events? And what assumptions were made about marina use that was not dinner cruises? (Levin)

Does the worst-case scenario in terms of peak traffic times account for the potential for dinner cruises or any use that would be high demand like that? (De La Uz)

Events and dinner boats regularly generate hundreds of vehicles per event or cruise. One event and two dinner cruises could attract over 2,000 people on-site within a 60-minute arrival window. This could mean more than 500 to 1,000 more vehicles, both parking and dropping off, than is suggested in the DEIS. (CP/Braito)
One question is the intended operation of the marina—would it be used by private or charter boats? The trip generation for charter boats would be expected to have significantly higher trip generation rates. (CP/Gluck)

A realistic multiple events scenario should be analyzed. (CP/Gluck)

We request more information about anticipated use of the marina. What types of users would there be? How would traffic be impacts during peak usage? Would limiting the marina to private users alleviate traffic impacts? (DCP)

How would max visitor Tribeca Film Festival event impact traffic? (DCP)

Response: With respect to the marina uses, the trip generation and travel demand assumptions included in the EIS for the marina were based on marina land use assumptions from other certified EIS documents, including the Hudson River Park FEIS and Brooklyn Bridge Park FEIS. With respect to special events, the transportation analysis considers a reasonable worst case development scenario, assuming a rooftop event size of 2,500 people on weekday and Saturday evenings, although the physical limitations of the rooftop would not actually permit 2,500 attendees. In fact, according to Tribeca Film Festival, events would generally not exceed 1,500 people, and would not occur on a frequent basis. The transportation impacts of the proposed project during the typical condition (no rooftop event) and prior to a 2,500-person event are described in Chapter 14 of the EIS. There is no proposal for any large passenger, dinner boat, or charter vessel operations at Pier 57 (see response to Comment 4). The number of marina slips has been reduced from the 190 slips analyzed in the EIS to 141 slips, further reflecting the conservatism of the travel demand estimates.

Comment 23: If the proposed access plan fails, the only exit from Chelsea Piers will be blocked and consequently the only entrance to Chelsea Piers will be blocked by the backup on [Route] 9A. Traffic problems are going to have a huge negative impact on our businesses, and directly impact critical response time for the New York Fire Department (FDNY) and Emergency Medical Service (EMS) to respond to Chelsea Piers and Chelsea Cove Park. (CP/Braito)

The traffic and circulation analyses describe a project that will disrupt the traffic on Route 9A and likely cause gridlock at the West 17th Street and Route 9A intersection, which is the sole egress point for Chelsea Piers. (CP/Binder)

A principal overriding issue is that any failure of the Pier 57 access plan would cause gridlock at Route 9A and West 17th Street, blocking Chelsea Piers egress and Pier 57 entry. For the Pier 57 circulation road the DEIS does not address projected traffic operations. Is there sufficient storage available on the circulation road to avoid vehicle queues that would block Route 9A and Chelsea Piers, as well as impede emergency vehicle access? (CP/Gluck)
Any conflicts (bike-car, pedestrian-taxi, etc.) at either Pier 57 entrance will block the sole exit from Chelsea Piers and will cause immediate back up on Route 9A. Problems on the Pier 57 access driveway will quickly jam up driveway and restrict entrance from 9A, thus causing more backups onto 9A. (CP/Tewksbury)

I urge the Trust and its traffic consultants to continue to work with Chelsea Piers, NYSDOT, and NYCDOT, as appropriate, to avoid to the extent possible a backup of traffic within Chelsea Piers due to vehicles entering Pier 57. This might be accomplished with the adjustment of the traffic lights as well as an addition of traffic enforcement agents to ensure traffic departure from Chelsea Piers during events. (Gottfried)

Response: The transportation analysis concluded that the project, with the proposed project improvements and mitigation measures, would not result in any significant adverse traffic impacts along Route 9A or at the project driveways. The HCS analysis for the intersection of Route 9A and West 16th Street shows that the estimated maximum (95th-percentile) queue length for the southbound right-turn to Pier 57 at this intersection would be adequately accommodated by the proposed 140-foot turn bay. Additionally, the Pier 57 frontage road has been designed to accommodate the projected traffic volumes associated with the project. A frontage road analysis, described below, shows that the curbside space provided by the Pier 57 frontage road would accommodate the peak hour curbside volumes. As such, queues are not expected to extend back to the West 17th Street intersection with Route 9A, and the Chelsea Piers exit driveway would not be adversely affected.

The analysis was performed as follows:
- The proposed Pier 57 frontage road is approximately 725 feet long.
- As there is the potential for buses to be present on the frontage road, the potential worst-case scenario was assumed in which 175 feet of the frontage road curb frontage (i.e., the entire distance between West 16th and West 17th streets) would be reserved for bus use.
- Another 100 feet of the curbside frontage was subtracted for curb cuts and crosswalks, resulting in a total of 450 feet of usable curbside length, the linear equivalent of more than two city blocks, which would remain for pick-up and drop-off activity.
- Assuming a conservative 25 feet per vehicle, 18 vehicle positions could be accommodated by 450 feet of available frontage.
- As shown in the EIS, the highest total peak traffic volume entering the frontage road would be 148 vehicles during the Weekday Evening Pre-Event peak hour (assuming a 2,500-person rooftop event), and no trucks would be
arriving during a Weekday evening hour. This volume includes some vehicles entering the parking garage without stopping curbside.

- Assuming a conservative 2 minutes of stopped time per pick-up/drop-off, each vehicle space would turnover 30 times in a one-hour period. Therefore, with 18 vehicle positions and each one having the ability to turnover 30 times per hour, there is a curbside capacity of 540 vehicles over a one-hour period. Since the conservative capacity of the frontage road is 540 vehicles per hour, and the maximum entering volume is only 148 vehicles per hour, the proposed frontage road has more than enough capacity to handle the highest projected peak curbside demand.

- As it is possible that there would be a surge of vehicles arriving before an event, the analysis also conservatively considers an additional scenario where half the entering vehicles would arrive in a 15-minute period. The 15-minute capacity of the curbside would be one quarter of the hourly capacity, or 135 vehicles per 15-minutes. If half of the peak hour entering vehicles, or 74 vehicles, all arrived in one 15-minute period, the curbside would still have more than enough capacity to handle the projected peak curbside demand.

HRPT and the applicant have met with NYCDOT, NYSDOT, and Chelsea Piers during the planning process, have reviewed and discussed alternative access plans and have committed to implement a Traffic Management Plan (TMP) which would include active management of the frontage road by project staff. A preliminary TMP is provided in the FEIS. Traffic enforcement agents (TEAs) and signal timing changes are proposed as mitigation.

Comment 24: Does the analysis account for a water taxi? (De La Uz)

The DEIS indicates that a new water taxi landing at Pier 57 potentially would serve as a possible alternative mode of travel that could replace other models of travel to and from the Pier 57 site. As a result, the water taxi landing is not reflected in the trip generation estimate in the DEIS with respect to its potential to introduce additional pedestrian trips through the study area that are not originating from, or destined to, Pier 57. The inclusion of the water taxi landing suggests a potential for attracting/generating higher volumes of pedestrian (walk) trips that are not destined to Pier 57, but rather pass by the proposed site on their way to and from other locations. Additional pedestrian trips have implications on both the pedestrian capacity analyses and the vehicular capacity analyses (i.e., conflicting pedestrian volumes for vehicle turning movements). (CP/Gluck)

How would the water taxi impact pedestrian volumes? (DCP)

Response: The potential water taxi is discussed on page 14-46 of the EIS:
There is the potential for a water taxi landing to be constructed on Pier 57. The landing could become a stop along the Hudson River water taxi route that currently stops at various locations including Pier 45 at Christopher Street and Pier 84 at West 44th Street. As a stand-alone use, it is expected that the water taxi landing would primarily attract pedestrians from along the esplanade. However, it would also provide an alternative mode for visitors to travel to and from the site and would therefore result in a modal shift that would reduce the number of pedestrians coming from subway stations, bus stops, and taxis on the local streets. Since the presence of the water taxi would likely reduce the transportation impact of the project, the transportation planning analysis conservatively did not account for the water taxi landing.

While some additional pedestrian trips might be generated through the study area by the presence of a water taxi, this potential increase would be offset by a reduction in pedestrian trips due to some site visitors choosing to travel via water taxi rather than coming from the landside of the pier.

**Comment 25:** The TMP needs further detail and examination. (Gottfried)

Chelsea Piers has been a presence in the area for over 18 years and during that time has developed a traffic and parking management plan. We urge HRPT and the developer to provide a more robust commitment to manage the circulation road. (CP/Binder)

It appears from a review of the DEIS that the TMP will be critical for the proposed access arrangement to operate safely and efficiently. The DEIS provides only a very brief and general description of the plan. The full extent to the TMP needs to be documented and the means for commitment to implement it formalized. The DEIS recommends dealing with the “intermittent condition” adverse impact on pedestrian operations in the north crosswalk at Route 9A and West 15th Street by using traffic enforcement agents. This should be detailed in the TMP along with additional conditions, such as blockage of Chelsea Piers egress that would trigger its implementation. The TMP should include actions that would be implemented to avoid queuing from the southbound right-turn lane at West 16th Street and along the circulation road (to prevent congestion that blocks Route 9A and Chelsea Piers egress) as well as to “control and manage crowds and conflict points along the bikeway.” The commitment of Pier 57 to implement the TMP would need to be formalized. (CP/Gluck)

**Response:** HRPT and the applicant agree that traffic management during event conditions is an important consideration. A preliminary TMP is provided in Chapter 14 of the FEIS and includes active staff traffic control efforts. As is typical and common for other projects in New York City, the TMP would be refined over time and would be designed to accommodate the needs of the site based on event size and type. It should be noted that the proposed TMP and access plan...
address the proposed uses specific to Pier 57, which are notably different in scale and character from those at Chelsea Piers.

**Comment 26:** Currently classified as an area of failing traffic intersections at times, the DEIS reflects low estimates of vehicular traffic accessing Pier 57 and using its circulation road (including private vehicles and taxis) due to some of the assumptions regarding trip generation, modal split and traffic assignments. For example, the low estimates for Pier 57 vehicular traffic reflect assumptions related to taxi drop-offs/pick-ups and to Pier 57 customers parking at off-site facilities. The majority of taxis destined for Pier 57 were assumed to use the drop-off location on the east side of Route 9A. In addition, no portion of Pier 57 traffic that is assigned to off-site parking facilities was assigned to Pier 57 entry/egress. Are these reasonable assumptions on a cold stormy night? We urge HRPT and the developer to reassess the traffic models using traffic inputs from Chelsea Piers. (CP/Binder)

The DEIS does not indicate the assumption used for allocating the taxi movements among the three possible locations identified in the DEIS: along the Pier 57 circulation road, at a designated off-site taxi stand located on northbound Route 9A between West 14th and West 15th Streets, or on the north side of West 15th Street between Tenth Avenue and Route 9A (also off-site). There are concerns that many of the taxi movements assumed in the DEIS to use an external (i.e., off-site) location would actually end up on the Pier 57 circulation road. Both external locations would require taxi users to walk a longer distance and cross Route 9A traffic. During evening hours and poor weather conditions this would appear to be unlikely. As a result, the turning volumes at the nearby intersections could be under-reported in the DEIS. In addition, there would be greater need for stacking along the circulation road to accommodate the additional taxis. (CP/Gluck)

How will taxis be encouraged to use the West 14/15th Street drop-off rather than accessing the circulation road in front of Pier 57? (DCP)

**Response:** For purposes of the transportation impact studies, taxi trips were routed to and from the site, the off-site taxi stand located on northbound Route 9A between West 14th and West 15th streets, and the north side of West 15th Street between Tenth Avenue and Route 9A based on logical assumptions regarding travel behavior. The commenter is incorrect in asserting that the majority of taxis destined for the project were assumed to use the drop off location on the east side of Route 9A. In fact, the majority of total project-generated taxi trips (56 to 68 percent, depending on the peak hour) were assigned to the on-site frontage road. The taxi drop-off/pick-up lane proposed for Route 9A northbound between West 14th Street and West 15th Street would minimize the number of taxis using the frontage road, and its use would be encouraged by providing appropriate curbside signage. Furthermore, the proposed taxi lane provides a safety benefit,
as it would tend to reduce the existing taxi behavior of stopping in the right travel lane on Route 9A northbound to drop off and pick up passengers. Northbound taxis that do not use this lay-by lane would instead have to travel through five additional traffic signals (four on 10th Avenue and one at Route 9A and West 17th Street) in order to access the Pier 57 frontage road, so it is reasonable to assume that they would be attracted to the Route 9A lay-by lane. Westbound arrivals were split between off-site taxi drop-off locations and the frontage road, while all taxis traveling southbound on Route 9A were assigned to enter the project site.

Additionally, few private autos are expected on-site given the limited number of on-site parking spaces. While poor weather conditions may exist and modify travel behaviors, they do not represent the typical condition, and are generally not considered as part of a transportation analysis. Moreover, rooftop event conditions are expected to occur primarily during good weather conditions, and it is also likely that fewer people would visit the site during inclement weather.

Comment 27: Assuming the traffic plan is accepted as proposed, it is therefore critical that the uses be clearly delineated and that a one year post-opening study be performed in consultation with NYCDOT and NYSDOT. (CP/Binder)

Response: The EIS defines the project program and the expected uses. It is expected that ongoing monitoring would occur during project startup and NYCDOT and NYSDOT could participate at their discretion. Because Route 9A is an important arterial roadway, it is anticipated that NYCDOT and NYSDOT would remain interested and active in Pier 57 operations. Likewise, the bikeway is also NYSDOT property, and therefore NYSDOT would remain interested and involved in its oversight.

Comment 28: We urge you to consider the alternative access plans Chelsea Piers has provided to HRPT and its consultants to help reduce the need for complicated, high volume access driveways and park-side circulation roadways (The preliminary plan represents an alternative approach to handling large volumes of traffic. It need not be adopted wholesale and elements, such as the location of the bikeway, can be re-configured. The important point is that the plan has an access configuration that is streamlined and less likely to break down). (CP/Binder)

Response: HRPT received two alternative access plans from Chelsea Piers (see Appendix E-3). Fatal flaws were identified with each plan. The first was received on September 26th, 2012. HRPT responded to Chelsea Piers on October 22, 2012 with the following comments:

1. Narrow Bikeway and Pedestrian System: The overall distance between Route 9A and Pier 57 does not permit adequate width for both the Hudson
River Bikeway and the park’s pedestrian system under the Chelsea Piers plan. The Chelsea Piers proposal provides only an 8-foot bikeway plus 2-foot buffers, including railings, on each side. By comparison, the proposed plan provides a 14 foot bikeway plus a planter buffer and a two foot buffer with railing. The bikeway configuration proposed by Chelsea Piers is one-half the size of the 16-foot-wide standard Hudson River Bikeway width. In addition to the very narrow bikeway, the Chelsea Piers plan also narrows the Hudson River pedestrian corridor along the face of the Pier 57 building. At the north end, the sidewalk would be approximately 13 feet (versus approximately 18 feet for the proposed project) and at the south end, an approximately 10-foot-wide pedestrian space would remain (versus approximately 15-foot for the proposed project.)

2. Infeasible Drop-Off Location: The Chelsea Piers plan would restrict all drop-offs and pickups to a lay-by lane south of Pier 57 that would be approximately 135 feet in length. The short length and remote location of the proposed drop-off (several hundred feet south of the main entrance to Pier 57), would cause uncontrolled drop-offs in front of the pier. The proposed project provides significantly more and convenient curbside space for drop-offs and pickups safely and unobstructed by the bikeway. The proposed project’s drop-off/pickup length is approximately 800 feet.

3. Uncontrolled Bikeway/Vehicle Conflicts: Placing the Hudson River Bikeway between the access roadway and the pier creates several uncontrolled hazardous vehicle/bicycle conflicts. Cars entering and exiting the garage would cross the bikeway, with poor sight lines. In addition, trucks backing into the loading docks and departing trucks would have to cross the bikeway. Any hand-carted freight for small shipments with trucks at curbside, would also be required to traverse the bikeway.

4. Deficient Pedestrian Crossing of Route 9A. The basis for design of the proposed project is to maximize pedestrian accessibility by closing the existing Pier 57 vehicle entrance/exit at West 15th Street and maximizing this as a pedestrian corridor. The Chelsea Piers plan closes one (south) of the two pedestrian crosswalks at the intersection of Route 9A/West 15th Street. This closure would require a significant concentration of pedestrian flow on only one crosswalk (north) resulting in heavy traffic delays for right-turners from West 15th Street onto Route 9A. Further, it is likely that inbound pedestrians would attempt to cross along this southern path anyway, yielding to unsafe conditions.

The second access plan proposed by Chelsea Piers was received on February 4, 2013. The following comments on this plan are provided below.
1. Hazardous entrance movement: The alternative access plan (AAP) proposes that southbound Route 9A traffic make a right turn into the frontage road without providing an exclusive southbound right-turn bay. Speed change lanes, such as right-turn lanes, are provided so that deceleration can be accomplished outside of the travel lanes in a safe manner. This minimizes interference with through traffic and reduces crash potential—most notably rear-end collisions. Right-turn lanes are consistently provided along Route 9A for southbound right turns exiting the roadway, including at Chelsea Piers. Not providing a right-turn bay would force vehicles exiting Route 9A to decelerate in the rightmost travel lane and present a potentially hazardous condition. Also, the movements at the proposed entrance on the AAP would occur at a much higher speed than in the proposed Pier 57 access plan given the angle of the turning movement and the elimination of the entrance speed table.

2. Infeasible walkway location: The AAP proposes to relocate all pedestrian traffic in front of Pier 57 into the Pier 57 building itself. An alteration to the headhouse would require approval from SHPO and is highly unlikely due to the historic nature of the building. Therefore, the pedestrian walkway/sidewalk along the Pier 57 frontage must be provided adjacent to the building façade, and providing a sidewalk with appropriate width would require significant alterations to the AAP and drastically reduces space for vehicles and/or bicyclists. It is not feasible to provide a direct north-south pedestrian walkway inside of the headhouse of the Pier 57 structure. This is due to the numerous ramps within the building, including the two vehicular ramps to the caisson level of the structure (located near the northern and southern edges of the headhouse) and the vehicular ramp to the second level of the structure (located in the center of the headhouse). North-south pedestrian connections would be provided in Pier 57, but these connections would be located west of the headhouse, due to the existing ramp elements.

3. Hazardous bikeway location: The AAP proposes to place the bikeway adjacent to the Pier 57 building façade without any buffer area separating the bikeway and the pedestrian space. This would force the high volume of pedestrians exiting the Pier 57 doorways to step directly across the bikeway, with no warning to bicyclists. It would also allow pedestrians to penetrate the bikeway from either direction at any location along the Pier 57 frontage, creating bicycle-pedestrian conflict points along the full frontage. A buffer area between the bikeway and the Pier 57 façade is required to avoid this condition. Also, trucks backing in and out of the loading docks would be required to cross the bikeway, and any hand-carted freight for small shipments with trucks at curbside would traverse the bikeway at uncontrolled locations. Also, the drop-off areas shown as a “hatched
orange” color in the AAP would result in all drop-offs stepping directly into
the bikeway, and all pick-ups having to stand in the bikeway before
entering the vehicle.

4. Inefficient Drop-Off/Pick-Up Operations. It is presumed that the AAP
proposes that pick-up/drop-off activity would be permitted to occur within
the two right-most travel lanes of the three-lane frontage road. (This
presumption is based on the AAP only providing 180 feet of curbside pick-
up/drop-off space, which is colored in “hatched orange” and designated as
“Drop-Off/Delivery Sidewalk” in the legend, and since this is significantly
less that the 725 feet of curbside space being provided in the proposed Pier
57 access plan, the AAP must be expecting that visitors would also use the
middle frontage road lane for drop-offs and pick-ups). This is problematic
on two fronts. First, vehicles dropping visitors off in the middle lane would
be letting pedestrians out into a second, active pick-up/drop-off lane, which
presents a potentially hazardous condition. Pedestrians walking out to the
middle lane to be picked-up would be penetrating the rightmost lane at
various points where sight lines may be blocked by other vehicles. Second,
vehicle stoppages in the middle lane would create inefficiencies in the use
of the curbside lane, as they would block the ability for curbside vehicles to
move back into traffic and for vehicles to access the curbside lane. This is
similar to the behavior exhibited at airport drop-off/pick-up areas where
vehicle stoppages across multiple lanes result in inefficiencies, blockages,
horn honking, vehicles stopping at angles, and the associated safety
concerns.

5. Hazardous Garage Entry Maneuvers. The AAP would result in vehicles
making a potentially unsafe 90-degree right turn across the bikeway into the
garage ramp at the south end of the pier. Motorists would have very limited
ability to see bicycles traveling southbound along the bikeway at these
uncontrolled garage/bicycle conflict points.

6. Hazardous Garage Exit Maneuvers. The AAP would result in vehicles
making a potentially unsafe 90-degree right turn across the bikeway out of
the garage ramp onto the frontage road. Because the AAP places the
bikeway right up against the façade of Pier 57, motorists would have very
limited ability to see cyclists traveling northbound and southbound along
the bikeway. Furthermore, vehicles exiting the garage would completely
block the bikeway while waiting for gaps to enter the frontage road, and
this conflict point would be uncontrolled.

7. Deficient Pedestrian Crossing of Route 9A. The AAP eliminates the south
crosswalk across Route 9A at West 15th Street. This closure would result in
insufficient crosswalk space to accommodate the expected pedestrian demand crossing Route 9A, thereby causing increased traffic delays for right-turners from West 15th Street onto Route 9A. Further, it is likely that inbound pedestrians would attempt to jaywalk across the south leg of the Route 9A and West 15th Street, creating a hazardous condition.

For all of the above reasons, both access plans were viewed as having fatal flaws with respect to traffic flow and safety and would not provide acceptable alternatives to the proposed access plan.

Comment 29: The primary concerns are that traffic volumes in the Pier 57 DEIS may be an underestimation of the volumes that could actually result from the intended operations and that, when there is a major weekday event, there are key intersections that are projected to operate with little or no capacity available to handle any additional traffic. Therefore, additional volume above the DEIS projections would result in traffic operational failures of elements of the roadway network to a significantly greater extent than documented in the DEIS. (CP/Gluck)

We are concerned that the proposed impacts from Pier 57 are not being adequately studied, and its potential to create significant adverse impacts, particularly as it relates to traffic, have been underestimated and will severely affect the operation of both Chelsea Piers and Route 9A. (Masyr)

Response: The transportation analysis presented in the EIS is based on the following conservative assumptions:

1. The transportation analysis considers a 190-slip marina, whereas the application now contemplates a 141-slip marina.

2. The transportation analysis considers a rooftop event of 2,500 people, which is substantially larger than the number of people that could be physically accommodated on the roof given the proposed design and fire egress requirements.

Therefore, the results of the transportation analysis presented in the EIS are an overestimation of the volumes that would be generated by the proposed project.

Comment 30: The short storage length of the signal-controlled southbound Route 9A right-turn lane could result in vehicle backups that block traffic on Route 9A, West 17th Street, the Chelsea Piers egress, and the Pier 57 entry. The 140-foot storage length of the southbound Route 9A right-turn lane may be insufficient to accommodate the traffic demand. There are potential operational problems that will limit the throughput of the southbound right-turn lane, including the conflicting movements and transportation modes, traffic control, design (e.g., geometry and speed table), proximity to the Pier 57 garage egress, and loading zone. A review of the analysis results from the DEIS indicates that, during the
weekday evening pre-event peak hour, the 95th-percentile queue of this right-turn movement to Pier 57 would be between 5 and 6 vehicles. This would allow for little or no available capacity to handle additional traffic entering Pier 57. These results confirm that any underestimation of Pier 57 traffic volumes could result in a significant worsening of projected traffic conditions and queuing that would impact Route 9A, Chelsea Piers, and Pier 57. (CP/Gluck)

There are no traffic analysis results provided for the operation of the two-lane circulation road in the DEIS. With the right lane identified in the DEIS as being used for multiple curbside activities, the circulation road would operate as a single lane much of the time with disruptions relating to the vehicles entering/exiting the curbside lane. Also, the DEIS identifies: large volumes of pedestrians crossing the circulation road at STOP-sign controlled crossings, a traffic signal on the circulation road at the southbound right-turn lane at West 16th Street, and truck loading and unloading operations at the north end of the Pier 57 building. Whether there is sufficient capacity available along the circulation road to avoid backups that extend across West 17th Street and impede Route 9A and Chelsea Piers egress has not been addressed in the DEIS. (CP/Gluck)

Analysis results for how the circulation road is projected to operate and the vehicle queue lengths for the proposed conditions should be provided. This includes projected traffic (vehicles and pedestrians) volumes/flow maps for the circulation road. Vehicular volumes should distinguish between cars, vans, taxis, buses, and trucks. The volumes should reflect all the activities along the circulation road, including vehicle traffic, truck deliveries, passenger loading/unloading, turns at the driveways, taxis, buses, etc., and pedestrian volumes crossing the circulation road. (CP/Gluck)

We have been provided the intersection capacity analysis reports for the intersection of West 16th Street and Route 9A (related to the southbound Route 9A right-turn lane to Pier 57). However, further discussion is needed regarding how well the traffic analysis reflects the dynamics at that location, including the speed table, conflicts with bikeway users, alignment of the turn on to the circulation road, etc. Further information is needed regarding the intersection of the right-turn lane and the two-lane circulation (frontage) road that could operate as only one lane under many conditions that are identified in the DEIS. (CP/Gluck)

**Response:**

The HCS analysis results show that the maximum (95th percentile) queue length for the southbound right-turn movement at the intersection of Route 9A and West 16th Street would not result in queues exceeding the storage capacity of the right-turn lane. The right-turn lane is proposed to be 140 feet long, which can hold up to 7 queued vehicles assuming 20 feet per vehicle. The HCS analysis for the With Action conditions calculates the maximum (95th percentile) queue lengths as 3.1, 4.0, 5.1, 3.3, and 2.1 vehicles for the Weekday
Midday, Weekday PM, Weekday Evening Pre-Event, Saturday Midday, and Saturday Evening Pre-Event peak hours, respectively. Note that HCS calculates traffic conditions for the peak 15-minute period of the peak hour; therefore, for the majority of the peak hour, queue lengths would be shorter than what is reported by HCS.

An analysis of the frontage road itself is provided in response to Comment 23. The southbound right-turn at the Route 9A and West 16th Street intersection is proposed as a skewed right-turn to provide improved visibility between the bikeway and turning vehicles. To counteract the possible higher turning speeds that could result from the skewed right-turn alignment, a speed table is recommended at this location. The higher turning speeds that would result from the skewed right turn and the slower turning speeds that would result from the speed table would offset each other and result in a turning speed similar to that of a 90-degree standard right turn.

**Comment 31:** One issue is the lack of information in the Pier 57 DEIS regarding the usage and operation of the Pier 57 circulation road. One of the missing items is the projected number of drop-offs related to both private vehicles and taxis for each of the analysis hours.

A comparison of vehicle trip projections and actual traffic volumes showed that the volumes entering and exiting the Pier 57 site during a peak hour do not match the vehicular trip generation for that peak hour. This is unexplained in the DEIS, but may be related to the assignment of site-generated traffic directly to/from external parking facilities without a drop-off or pick-up at Pier 57.

The question is what proportion of the vehicle trips assigned to off-site parking were estimated in the DEIS to first stop at Pier 57 to discharge passengers before parking externally. A similar situation could exist after a visit/event when a driver who was parked at an external facility would return to Pier 57 to pick-up passengers.

Since it is reasonable to expect there would be at least some drop-offs at Pier 57 before parking externally, vehicles dropping off passengers should have been estimated and assigned to Pier 57 access/egress points. The DEIS preparers need to identify what proportion, if any, of the vehicles parking externally was assigned to Pier 57 for drop-offs and what proportion was assigned directly to the external parking facilities.

As a result of how the vehicles destined to external parking facilities were assigned to the roadway network, the traffic analysis may underestimate the operational impacts of the proposed site including Route 9A at West16th Street and at West 17th Street. (CP/Gluck)
The number and type of activities proposed on the circulation road curb frontage and the associated vehicle stacking needs may be underestimated in the DEIS. For example, during the weekday evening pre-event peak hour the DEIS projects a rooftop event would generate 1,717 person trips. Applying modal split and other assumptions, the DEIS projects this type of event would generate only 79 vehicle trips, representing less than 5 percent of the estimated person trips. Furthermore, it appears that of the 79 vehicle trips, only an estimated 45 vehicle trips were assigned in the DEIS to Pier 57 entry/egress locations (or circulation road). The remaining 24 vehicle trips (79–45) were routed directly to off-site parking without accounting for site drop-offs and pick-ups. Implications of higher actual traffic volumes than those estimated in the DEIS include worse operational and safety conditions than indicated in the DEIS, including at the Pier 57 entry and egress points. (CP/Gluck)

Modal splits used in the DEIS (car/taxi vs. other modes) are artificially low. The DEIS projections that most car/taxis will drop off or park east of Route 9A is not realistic. (CP/Tewksbury)

Response: As the comment correctly points out, not all vehicular trips generated by the proposed project were assigned to the site, as there would be limited parking available on-site. As such, vehicle trips were assigned to off-site parking facilities located within a ¼ mile of Pier 57, which is a reasonable distance for people to walk from their cars to the project site. The trip assignment for vehicular traffic followed the methodology described on Page 16-15 of the 2012 CEQR Technical Manual: “A proposed project may have multiple parking facilities available to it, both on-site and off-site. In this case, the assessment considers how specific arrival routes could link up with the different parking sites via a reasoned judgment as to where motorists coming from different directions are likely to park. If a site has multiple parking facilities available to it, more cars cannot be assigned to any of them than its capacity can accommodate.” Due to the time it would take for drivers to drop off passengers, travel through multiple traffic signals and find off-site parking, and then walk back to the site, the number of on-site drop-offs would be minimal. An analysis of the frontage road itself is provided in response to Comment 23.

The modal split for the rooftop event was based on survey data collected for a similar event within Hudson River Park at Pier 54. This modal split, as well as the modal splits for all land uses included in the proposed project, are included in the EIS and were reviewed by NYCDOT.

Comment 32: Regarding circulation road usage and projected volumes at intersections near Pier 57, there is also a concern related to bus usage and stops (both MTA/NYCT and tour buses). The DEIS indicates there is the possibility of “providing an on-site bus stop for the NYCT M14 bus route” on the circulation roadway north of the Pier 57 building. The DEIS also indicates the “potential for tour bus activity
to be generated by the proposed project...” on the circulation roadway. Although the DEIS states that “…the access plan would accommodate such activities, if needed,” the bus volumes are not projected and are not reflected in any of the analyses. (CP/Gluck)

The traffic plans in the DEIS describe bus transportation but no buses seem to be factored into actual traffic counts and operations. (CP/Tewksbury)

Response: There is no NYCT bus stop proposed at Pier 57. The EIS indicates that there is a potential to use the section of frontage road between West 16th and West 17th streets for a possible bus stop location. City and tour buses would potentially stop here to load/unload passengers, but would not be permitted to use this area for layovers. The segment of the frontage road where the potential bus stop might be located is approximately 175 feet long, enough to accommodate one articulated city bus and two tour buses. Additionally, the analysis of the frontage road, provided in response to Comment 23, shows that the curbside pick-up and drop-off is more than sufficient to handle even the highest project demands. Therefore, additional buses could be accommodated along the frontage road if necessary, even during peak hours.

The transportation analysis in the DEIS did not consider that there would be a city bus stop along frontage road because if buses were to stop on-site, the bus modal share would increase with a concomitant reduction in the number of pedestrians that would cross at study intersections. The analysis conservatively assumed buses would stop off-site so that a greater number of pedestrians would be crossing at the study intersections.

Comment 33: The trip generation for Pier 57 estimates sites two sources for the Marina trip rates: the Hudson River Park FEIS (1998) and the Brooklyn Bridge Park FEIS (2005). While the higher rate of 6.23 trips/slip from the Brooklyn Bridge Park FEIS is used to estimate the weekday trips (as compared with 5.9 trips/slip in the Hudson River Park FEIS), the lower rate of 12.8 trips/slip from the Hudson River Park FEIS is used to estimate the Saturday trips (as compared with the 13.47 trips/slip rate from the Brooklyn Bridge FEIS). Therefore, the trip generation for Pier 57 for Saturday may be underestimated. (CP/Gluck)

Response: The DEIS cites two sources for the marina trip generation. The trip generation rates provided in the Hudson River Park FEIS were assumed to be more appropriate for the trip generation calculations for Pier 57, because Pier 57 is within Hudson River Park. However, NYCDOT provided comments on September 6, 2011, that specifically requested use of the trip generation rate from the Brooklyn Bridge Park FEIS for the weekday peak hours. Using the higher trip generation rate from the Brooklyn Bridge Park FEIS to estimate the number of Saturday trips would result in a difference of at most 6 trips during either Saturday peak hour, which would not change the conclusions presented in the EIS. Additionally, the trip generation estimates for the Marina land use are
significantly overstated, as a 190 slip marina was analyzed compared to the 141 slip marina that is proposed.

Comment 34: As stated on page 12-4 of the DEIS, the Marina includes “slips for one or more historic vessels.” Presumably, historic vessels—whether they remain docked or actively sail—could operate as visitor attractions at Pier 57, and therefore potentially generate additional pedestrian/vehicle trips to Pier 57. The trip generation rates for this activity are not reflected in the trip generation rates for the Marina land use cited in the source documents referenced in the DEIS: the *Hudson River Park FEIS* (1998) and the *Brooklyn Bridge Park FEIS* (2005). (CP/Gluck)

Response: The historic vessels contemplated as part of the proposed project would not be of a size or character that would generate any substantial number of trips not already accounted for in the analyses.

Comment 35: The weekday and Saturday person-trip generation rates for the Food Counter land use are the same as those for the Quality Restaurant land use. Typically, high-turnover restaurants, such as those envisioned as part of the Food Counter use, have higher trip generation rates than Quality Restaurants. This conclusion is supported by data in the Institute of Transportation Engineers (ITE) *Trip Generation* manual, which indicates that average daily trip rates for a High-Turnover Restaurant (Land Use Code 932) are 41 percent higher than those for a Quality Restaurant (Land Use Code 931) on a weekday, and 68 percent higher on a Saturday. (CP/Gluck)

Response: First, the suggestion to base trip generation rates on the High-Turnover (Sit-Down) Restaurant land use is not appropriate because the ITE defines this land use as establishments with duration of stay of approximately 1 hour and where patrons wait to be seated, are served by a waitress/waiter, order from a menu, and pay for their meal after they eat. The proposed food counters do not operate with any of these characteristics.

Second, the trip generation estimates included in the EIS for the Food Counter land use are conservative. The most appropriate trip generation for food counters would be the trip generation rates for the Destination Retail land use. This is because, as described in the EIS, the majority of patrons to the food counters would also be shopping at the retail pods or other site uses, similar in operation to a “food court” within a shopping center. Furthermore, the published ITE and CEQR trip generation rates for the destination retail land use are based on source surveys performed at shopping centers with restaurants and food courts/counters. Therefore, including food counter square footage in the destination retail square footage is appropriate for trip generation purposes, as food-related trips are already captured in those rates. The trip generation rates
used in the EIS are higher than Destination Retail rates and are therefore more conservative.

**Comment 36:** AECOM has prepared a list of potential mitigation measures that can be further investigated to minimize adverse impacts from Pier 57 on Chelsea Piers egress based on the information currently provided in the DEIS. We urge HRPT and the developer to include these measures in a binding recorded document and to take other actions to minimize adverse traffic impacts. (CP/Binder)

The list below presents potential mitigation actions that could be further investigated to minimize adverse impacts from Pier 57 on Chelsea Piers egress. However, a fundamental question is whether the projected volumes in the Pier 57 DEIS are a reasonable estimate of the anticipated site-generated traffic.

1. Increase green time at the Route 9A and West 16th Street traffic signal only for the southbound right-turn movement into Pier 57 at West 16th Street beyond what is allowed for the southbound left-turn movement. However, this would reduce the green signal time for the bikeway.

2. Provide manual traffic control at the intersection of the southbound right-turn lane/circulation road/bikeway at West 16th Street to manage conflicts and prevent queues from the right-turn lane extending onto Route 9A and blocking Chelsea Piers egress and Pier 57 entry.

3. Provide manual traffic control along Route 9A at the intersection of West 17th Street/Chelsea Piers egress/circulation road to manage conflicts and prevent queues from the circulation road extending onto Route 9A and blocking Chelsea Piers egress and Pier 57 ingress.

4. Relocated the potential bus stop shown in the DEIS from north of West 16th Street to a location near West 15th Street to help maintain two lanes on the circulation road between West 16th and 17th Streets.

5. Implement provisions to minimize taxi drop-offs/pick-ups along the circulation road and enforce usage of the taxi zone on the east side of Route 9A between West 14th and West 15th Streets and along the north side of West 15th Street between Route 9A and Tenth Avenue.

6. Prohibit curbside activities on the circulation road between West 16th and West 17th Streets, redirecting them further south, and enforce these prohibitions, providing manual control, if needed.

7. If there is a charter boat operation envisioned as part of the marina plan, then limit the charter operations size and times to help manage traffic volumes and conditions along the circulation road and at nearby intersections.
8. Minimize curbside activities on the circulation road in the vicinity of the West 16th Street entry during peak periods of inactivity, particularly when there is an event in order to help maintain traffic flow.

9. Detail the provisions relating to Pier 57 traffic operations in the TMP and establish as a major objective the prevention of congestion on the circulation road and southbound right-turn lane (at West 16th Street) that could impede Route 9A and the Chelsea Piers egress route.

10. Develop a comprehensive TMP to include provisions on how to avoid queuing from the southbound right-turn lane at West 16th Street and along the circulation road as well as to “control and manage crowds and conflict points along the bikeway.” The TMP should be reevaluated during the first year of Pier 57 operations and then reviewed and updated in regular five-year intervals.

11. Include the requirement for implementation of the above actions in a binding document (such as the lease). (CP/Gluck)

Response: Mitigation measures to address the Chelsea Piers egress are not required, because the project would not result in any significant adverse impacts to Chelsea Piers egress. The mitigation measures described in Chapter 22 of the EIS would fully mitigate the significant adverse project impacts identified in Chapter 14 of the EIS. The preliminary TMP, which includes some of the commenter’s suggested elements, is provided in the FEIS and the lease would include a requirement for its implementation.

While not required to address significant adverse traffic impacts, certain aspects of the mitigation measures proposed by Chelsea Piers may be incorporated into the design, including the relocation of the proposed bus stop.

Comment 37: Those using the bikeway will now endure horn honking and exhaust fumes on both sides; more traffic lights hindering their trip; and more risk of getting injured or killed by motorists crossing the path. I do not understand the logic of building a driveway and crossing points to accommodate all motorists at the expense of Greenway users, like you are planning to do. A “pull in” area that did not cross the Greenway, such as at the Intrepid, seems like a preferable idea. (Kelliher)

Response: The project team carefully considered multiple access and egress schemes for Pier 57. A proposal that flipped the locations of the bikeway and frontage road was considered but was not pursued. If the frontage road did not cross the bikeway as proposed, all pedestrians, taxi pick-up and drop-offs, and truck deliveries would have to cross the bikeway to access the pier, and these trips would not be concentrated at the crosswalks. Additionally, vehicles would have to cross the bikeway at uncontrolled driveways to access the on-site parking. Therefore, it was determined that it would be to the benefit of the users of the
bikeway to concentrate the vehicular and pedestrian crossing locations at a limited number of specific and controlled locations.

**Comment 38:** There are already a number of driveways going across the greenway. The project should look at how to make the best use of those without adding more crossings. The addition of 75 parking spaces is just a magnet for more traffic to cross the path. The project should reduce or eliminate the parking. (Budnick)

**Response:** The access plan proposes to utilize one existing greenway crossing and there are no other viable existing crossings that could serve the project. The project also creates two additional greenway crossings, both of which are necessary for the site access plan to function properly. Where new crossings are proposed, safety measures such as signalization, speed tables, pavement markings, signage, and bollards have been incorporated into the design. The proposed parking is necessary to serve the occupants, visitors, customers, and employees of the project and would be accessory parking only. Seventy-four accessory parking spaces (the proposed number of spaces) is a small amount of parking for a project of this size; the majority of project-generated vehicular traffic would be parking off-site and would not be crossing the greenway. Access to the proposed parking spaces would be via existing driveways within the historic pier structure.

**Comment 39:** Has the analysis accounted for the potential for conflicts at Tenth Avenue and West 17th Street and the existing traffic signal at that location? (Cantor)

**Response:** The transportation analysis in Chapter 14 of the EIS included the Tenth Avenue and West 17th Street intersection and accounted for the existing traffic signal operations.

**Comment 40:** Does the EIS analysis software include the overlap of people and cars which have a tendency to run a yellow and people which have a tendency to be halfway through an intersection? (Cantor)

**Response:** The software used to conduct the transportation analysis uses algorithms to calculate delay, level of service, queues, etc. that were developed based on actual driver/travel behavior. However, the software does not account for illegal maneuvers by pedestrians or motorists.

**Comment 41:** We believe it is imperative for NYCDOT to require further study of Pier 57 traffic issues, including exploring alternatives that do not use 17th Street as the primary project entrance. (CP/Tewksbury)

**Response:** The access to Pier 57 from West 17th Street is a critical component of the access plan. The driveway at West 17th Street provides 175 feet of curbside space along the frontage road and serves vehicles accessing the site from the south and
the east. Without the access at West 17th, the curbside space would be reduced and all vehicles would have to access the site from West 16th Street. The vehicle storage in the southbound right-turn lane at West 16th Street is limited to 140-feet, the distance between West 16th Street and West 17th Street. This storage space is adequate to accommodate vehicles accessing the site from the north, but would not be adequate to serve all vehicles accessing the site.

Comment 42: Will pedestrians and runners be able to use the segment of the greenway fronting Pier 57, from West 14th to West 17th Streets? Or exclusively bikes? (DCP)

Response: Although the bikeway is not park property, HRPT encourages segregating bikes and pedestrians when feasible and uses signage and education through Parks Enforcement Patrol officers to encourage pedestrians and runners to use the esplanade. As described in Chapter 1, “Project Description” of the EIS, a wide sidewalk would be provided along the project frontage to encourage pedestrians to walk adjacent to the project rather than on the bikeway.

Comment 43: Is anything being done to prevent drivers from Chelsea Piers’ driveway entering the Pier 57 circulation road at West 17th Street? (DCP)

Response: The geometry of the curve from the Chelsea Piers egress to the entrance to the Pier 57 circulation road is designed to make it very difficult to physically make the right turn onto the circulation road. The project would reinforce the restriction on this movement with signage that would be located on the right side of the Chelsea Piers approach to West 17th Street and Route 9A near the Chelsea Piers stop line.

Comment 44: Is there a breakdown of taxis projected to use the designated drop-off between West 14th and West 15th Streets vs. entering circulation road directly in front? (DCP)

Response: The breakdown of taxis picking up/dropping off on-site vs. off-site is generally 60 percent on-site and 40 percent off-site and varies slightly by peak hour.

Comment 45: West 17th Street is being restriped from one to two lanes: how deep are these turning lanes? (DCP)

Response: The new turn-lane on West 17th Street would be approximately 165 feet long, which would provide storage for approximately 8 vehicles.

Comment 46: How will southbound drivers be prevented from turning right at West 17th Street on Route 9A? (DCP)

Response: Vehicles accessing Pier 57 via southbound Route 9A would not be allowed to make an illegal right turn at West 17th Street to access the Pier 57 frontage road.
through signage, striping, and the overall design of the intersection. Specific measures could include: (1) advance signage that would direct southbound drivers to access the site via the West 16th Street entrance; (2) signage on Route 9A at West 17th Street would inform drivers that right-turns are not permitted at this intersection; and (3) large white “through only” arrows could be painted on the three southbound Route 9A travel lanes at West 17th Street to indicate that the travel lanes are for through movements only.

Comment 47: The volume-to-capacity (v/c) ratio shown for the southbound left-turn movement from Route 9A to West 14th Street ranges as high as 1.99 for existing conditions. For NYCDOT, the existing v/c ratio should not exceed 1.05. Such a high v/c ratio for this movement raises questions about how well the analysis reflects existing conditions at this location and along southbound Route 9A. The applicant should provide information as to why the high v/c ratios were retained for existing conditions and how this may affect the analysis results for the intersection of Route 9A and West 14th Street. (CP/Gluck)

Response: The high v/c ratios used in the analysis of West 14th Street and Route 9A are a result of calibrating the operations at this intersection to better match actual existing conditions. When the through movements along Route 9A are red, the southbound left-turn at West 14th Street and Route 9A has a dedicated green phase with the pedestrian phase for the south crosswalk. This phase is 41 seconds long. However, the southbound left-turn lane cannot take advantage of the full phase length, because southbound traffic is held up at the red light at the West 15th Street intersection. Not accounting for the metering of traffic at West 15th Street would result in a better LOS for the southbound left turn than what is experienced in the field; to calibrate HCS to account for the unused portion of the green time, the HCS file for West 14th Street and Route 9A was modified to reduce the green time for the southbound left-turn phase by 22 seconds and add it to the red time. This resulted in the southbound left-turn lane group having v/c ratios in excess of 1.05.

GREENHOUSE GASES AND CLIMATE CHANGE

Comment 48: The applicant and the HRPT should continue giving sufficient consideration of the impact of rising sea levels on this project. (CB4)

Response: Comment noted. In addition to the sea level rise resilience measures described in the EIS (the use of flood barriers for predicted storm events), the applicant has also designed the proposed project to locate mechanical space and other critical infrastructure on the roof of the headhouse, well above current as well as any anticipated future flood levels.
CONSTRUCTION

Comment 49: There should be some benefit to the community during the extended construction period of the project, perhaps mitigation and enhancement of pathways around the site, and limiting of construction take-over of lanes on major traffic artery. (CB4)

Response: As discussed in Chapter 1, “Project Description,” and Chapter 19, “Construction,” the proposed project would repair the existing perimeter walkway, extend it to connect with the Hudson River Park waterfront esplanade to the east of the pier, and create new public walkways parallel to the existing bulkhead, thereby enlarging the currently limited public circulation space along the bulkhead. Bikeway and traffic lane closures on southbound Route 9A would be limited and would only occur on selective weekends and/or nighttime periods during the project site's entrance reconfiguration work.

Comment 50: We recommend that a construction task force be established, with representatives of all stakeholders, which will meet at least monthly throughout the construction phase of the project and must be in place prior to the commencement of demolition. (CB4)

Response: As discussed in Chapter 19, “Construction,” a field representative would serve as the contact point for the community and local leaders, and would be available to meet and work with the community to resolve concerns or problems that may arise during the construction process.