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**Gale A. Brewer, Borough President**

**Testimony of Manhattan Borough President Gale A. Brewer  
City Planning Commission  
Cal. Nos. 22-27 Special Hudson River Park District/550 Washington  
August 24, 2016**

Thank you for the opportunity to testify today on 1) the redevelopment of the St. John's Terminal Site and 2) payment for development rights to the Hudson River Park Trust for Pier 40.

I would like to start by thanking Chair Weisbrod and the staff of the Department of City Planning for their hard work in crafting a text amendment that creates a special permit to facilitate transfers of development rights from the Park to a receiving site. The use of this special permit must go through ULURP. I support the text amendment but think a cap should be added to make sure no additional rights are transferred from Pier 40 into Community District 2.

This brings me to the matter that I will spend the bulk, pun intended, of my remarks on. The proposal before the City Planning Commission today is the biggest single development in the history of the neighborhood in the last 100 years.

The development isn't just large in terms of the parcel of land involved. Bringing more than 1,500 units to two blocks, the proposed development's physical height and residential density will create a massive building that hulks over this neighborhood. The project will have adverse impacts on transportation and open space, and will create significant issues during its construction.

If we are going to ask a neighborhood to accept this kind of density, and the impacts that go along with it, we have to make sure we have done everything possible to shape the project in a manner that most benefits the neighborhood, addresses its needs, and mitigates those impacts. This project falls short of that standard.

We can do a better job in stitching this development into the surrounding neighborhood, ameliorating the impacts on parking and open space, and improving the location and design of the proposed affordable housing.

So how can this project be improved? 1. Eliminate most of the proposed parking, 2. Throw out the big box store, 3. Create a great open space and pedestrian realm plan, and 4. Increase the amount of affordable housing.

So let's tackle parking first. I understand the need for some flexibility for such a large development, like the parking garage on the North Site. But I cannot support the special permits for additional parking on the South and Center Sites. These permits would put so many parking spaces in the project that it would use up the permitted parking ratio for the entire neighborhood and would cause huge impacts. And the below grade space can be better used. For example, in addition to active recreation space, elimination of the parking below grade creates opportunities for cultural uses such as rehearsal space, small theaters, and galleries. These types of uses will help draw people to the site and create additional foot traffic. Active indoor recreation space and cultural uses are far more compatible with the park, and the General Purposes of the Special Hudson River Park District. So these two additional special permits for parking should not be granted.

This proposed development also lacks a cohesive pedestrian realm plan – and yes, that includes retail and how people move in and around the site. There is a lack of small retail spaces along West Houston and Clarkson Streets and the additional through-block connector is designed as a gigantic driveway -- focused on vehicles rather than people.

This is why a big box store is a no-go. It will cause significant traffic problems, and is not the type of neighborhood retail that either the Community Board or I want. We don't need destination retail here, we need neighborhood retail: an affordable supermarket and small business corridors with multiple smaller stores along West Houston, Clarkson and Washington Streets. We need eyes and doors on the street, and lighting and activity. If this development is to look outward, which it should, it must provide retail opportunities that serve its residents and those that live in the surrounding neighborhood which it intends to be a part of – not an island onto itself.

The environmental review is clear that this proposal will substantially increase demand on open space. Yet the proposal does little to provide new space to its proposed residents or the neighborhood to offset its density. These impacts can be addressed by creating more at-grade usable open space, in addition to the courtyard and below grade active recreation space which would come from eliminating the additional parking garages.

While creating an accessible courtyard is a first step, the through-site driveway must be activated with lighting, additional planting, and seating areas to serve pedestrians first, not cars. This will help offset the open space impact and create an additional pathway to the park.

The above-grade publicly accessible areas over West Houston Street, while beautifully designed, will never have the same utility as at-grade space. Keeping three rail beds will darken West Houston Street. The two at the farthest edges of the block should be removed, and a plan developed for lighting the underside of the remaining one. In addition, there has to be a retail plan for smaller and active frontages with street level entrances to invite the public to use this street.

This project does provide sorely-needed affordable housing. However, given its impacts and the needs of the community, the housing plan can be improved. First, almost all of the affordable housing units in the project could end up being contained in buildings on the east side of the sites – furthest from the Hudson River and the park and closest to the UPS building and manufacturing.

Second, I am concerned that the size of the senior units will make them unappealing to seniors, especially to those not living alone. As proposed, seventy-five percent of these units will be studio apartments. Even seniors living alone but downsizing from their previous homes may find living in a studio difficult. But those in couples or who have help in the home may find this living situation extremely difficult and untenable. The ratio should be flipped.

Third, I believe that the value of the air rights should not have been discounted for the provision of affordable housing. Affordable housing is a cost of doing business in this city – we should expect it without offering such discounts. Given the size of the project, the extent of the waivers and the funding to the Pier, I am convinced that we could have gotten additional affordable housing.

Lastly, a significant part of the affordability package should be how all residents access amenities. All amenities, including exercise and recreation space beyond that which is required under zoning, should be accessed for free, or capped at a total cost not to exceed 20-30% for the affordable tenants.