October 8, 2015

Denise Pisani  
Senior Project Manager  
Mayor’s Office of Sustainability  
253 Broadway, 7th Floor  
New York, New York 10007

Re: Citywide Ferry Service, Draft Environmental Impact Statement, Comments on Draft Scope of Work

Dear Ms. Pisani,

On behalf of the Waterfront Alliance, I submit these comments on the Draft Scope of Work for the Draft Environmental Impact Statement (DEIS) for Citywide Ferry Service (CEQR No. 15DME009Y) and thank you for seeking public feedback on the project’s environmental review. We are a bi-state coalition of over 850 community and recreational groups, educational institutions, businesses, and other stakeholders committed to restoring and revitalizing the New York and New Jersey waterways. We have been the foremost civic voice for expanded waterborne transit, raising the call for ferry transit service to underserved districts across the city.

The Waterfront Alliance strongly supports Citywide Ferry Service (CFS), and is committed to working with officials and stakeholders to ensure that our call for a frequent, affordable ferry network serving all five boroughs is fully realized.

CFS is an extraordinary step forward in the ongoing revitalization of our waterways. The proposed network will expand waterborne transit to all five boroughs by 2018, doubling the number of New York City neighborhoods with regular ferry service. This will increase access to new and existing commercial, residential, and recreational waterfront uses, as well as complement the Administration’s overall housing plan.

The City’s commitment to support the service with affordable fares equivalent to a subway or bus ride will be a critical component of its success. We urge policymakers to implement a dedicated, sustainable source of operating funding, such as value capture or congestion charge revenue, in order to preserve its benefits beyond the five-year pilot window. We also urge CFS administrators and operators to continue to engage local stakeholders, at the district-by-district level, to ensure that community voices help produce good service and yield high ridership.

Expanding our ferry network will provide economic benefits for working families and strengthen our resilience in times of crisis, for the cost of a “rounding error” in typical transportation dollars. Citywide Ferry Service will:

- **Provide good return on investment:** This service is projected to be delivered relatively quickly, and for modest public investment relative to other transportation projects, and infrastructure can be moved to other locations if more suitable locations are identified.
- **Improve transit equity:** Mayor de Blasio has rightly positioned this service as a measure to address inequality, connecting New Yorkers in waterfront districts such as Red Hook, Astoria, or Soundview, that are disconnected from the region’s mass transit network with economic opportunities.
• **Strengthen resiliency through redundancy:** New transportation choice will relieve pressure from an already overburdened mass transit network, and increase our region’s preparedness to emergency system-wide shutdowns, as witnessed on 9/11, the 2003 blackout, and Superstorm Sandy.

**COMMENTS ON DRAFT SCOPE of WORK**

The Waterfront Alliance recommends an environmental review that is somewhat more “conservative” than what is represented in the current scoping document, for an approach that meets both the letter of the City Environmental Quality Review (CEQR) and also its spirit. To that end, we offer comments on the following Tasks as enumerated by the Draft Scope of Work (Scope) for the DEIS.

**Task 2. Land Use, Zoning and Public Policy**

The launch of the East River Ferry coincided with substantial increases in real estate value in the immediate vicinity of its landing sites, following a broad rezoning of the East River waterfront in Brooklyn and Queens. Where possible, this environmental review should consider not only current patterns and pending actions, but also the extent to which improved transportation access via ferry service may induce new development. To that end, the secondary study area should be expanded from 400 ft. to one-half mile, the typical catchment area for a transit station.

**Task 4. Open Space**

New York’s waterways have become an increasingly desirable space for recreational use and continue to be a source of economic activity. The Scope describes a plan to coordinate CFS operations with other “commercial and recreational users of the East River” as part of its Fleet Operations planning. The environmental review should document a stakeholder consultation process with other harbor users, including recreational and commercial uses, in the development of Standard Operating Procedures for CFS.

While CEQR does not contemplate water-based recreation, the Open Space analysis should nonetheless consider this given the potential impacts to non-motorized boating and other recreational activities, in general. More specifically, the proposed locations in Hallets Cove, Astoria (Site 2), and Stuyvesant Cove (Site 6) enjoy relatively protected waters well-suited to recreational uses, and are the sites of a capital projects to increase public access to the waterways for recreation and education. Those projects, funded by New York City Council Member Costa Constantinides and Queens Borough President Melinda Katz, and New York City Council Member Daniel Garodnick, respectively, are now under the direction of NYCEDC. This environmental review process must document considerations allowing for increased recreational uses in these areas, which will set important precedents for balancing diverse on-water uses.

**Task 7. Natural Resources**

Ferries provide an important public benefit—transportation—but produce wakes that can cause disruption to other users of the waterways or waterfront operations. In order to best preserve coastal infrastructure, both natural and physical, we recommend CFS operators demonstrate an investigation of improved hull design, engineered for New York Harbor. The scheduling of routes and headways must consider the impact of higher speeds on shorefront wake action. Furthermore, these issues can be minimized through improved enforcement of existing no-wake zones by the US Coast Guard and the NYPD Harbor Unit.
Task 8. Transportation
We applaud the City’s selection, in general, of landing locations adjacent to active population centers with existing, adequate pedestrian infrastructure. However, the Scope for pedestrian safety should be expanded to consider pedestrian safety improvements to the typical walking routes for all landings, not only the three landings that trigger more detailed analysis based on projected pedestrian volumes and high-crash intersection locations. The Scope should also be expanded to consider improvements to the bicycle network than may increase bicycle safety.

In addition, alternative scenarios for parking in Soundview should be considered. We agree with the assumption that a “higher proportion of ferry users are projected to use auto/taxi to access [the Soundview] ferry landing” than others in higher-density districts with lower rates of car ownership. The Scope indicates that parking facilities may be provided in concert with the proposed construction of a marina currently planned by NYC Parks and its concessionaire. Although we strongly support new facilities to serve on-water recreation as well as transportation, we recommend that this Scope be expanded to consider the alternative that the marina construction does not proceed as planned, or does not provide parking as currently proposed.

Ferries, like all fuel-powered vehicles, still produce some air pollution. Diesel fuel exhaust, and the resultant particulate emissions, have been identified as one of the most significant airborne health risks facing our region. In 2008, New York City mandated the use of less polluting, ultra-low sulfur diesel by City-owned ferries, and many private operators have followed suit.

The Waterfront Alliance supports the proposed analysis of “changes in vehicle miles traveled (VMT) due to increased use” of ferry transit, “as a result of modal shift from personal vehicles,” and the resultant impact on local air quality and greenhouse gas emissions. We also strongly support the development of “a central location or locations for fueling and off-hours vessel lay-overs,” as described under Fleet Operations, that could substantially reduce vessel travel at the beginning and end of each service day.

Additionally, this analysis should account for the current and potential regulatory landscape governing ferry fuel use and emissions, and advancements in technology that could be applied or tested via the CFS fleet. This analysis should incorporate new federal regulations mandating progressive reductions of nitrogen oxide emissions beginning January 2016, as well as the possibility that the New York City Council may implement legislation mandating the use of biodiesel fuel in the City’s ferry fleet. Intro 54, sponsored by Council Member Costa Constantinides, would mandate that all City-operated ferries be powered by ultra-low sulfur diesel fuel blend with at least 20% biodiesel by January 1, 2020.

The Request for Proposals for CFS, and its subsequent Addendum, both issued earlier this year, placed a high value on reducing emissions for the CFS fleet, recommending for example the “use of vessels with Tier 4 engines or higher, or an action plan to upgrade engines within 3 years of launch.” Accordingly, this environmental analysis should consider, to the extent possible, projected emissions of both the Year 1 fleet and the Year 4 fleet.

Task 11. Noise
The Waterfront Alliance recommends that this analysis draw the critical distinction between general noise generated by normal ferry operations (such as engine noise),
and the acute noise produced by ferry horn sounds, mandated by the US Coast Guard for safe navigation per Inland Navigation Rule 34. Residents of Lower Manhattan, working through Manhattan Community Board 1, have worked with ferry operators to attempt to address concerns from horn soundings at from World Financial Center.

**COMMENTS on PROPOSED ACTIONS**

The East River Ferry demonstrated a demand for ferry transportation across Brooklyn and Queens. CFS will build on that success, providing new transportation options for communities with even greater transportation challenges than those served by the East River Ferry, including Red Hook, Sunset Park, and Bay Ridge, Brooklyn; Astoria, Queens; Roosevelt Island, Manhattan; and Soundview, Bronx.

Yet some questions remain regarding the implementation of this service, as well as another route that is proposed but not planned. To ensure a successful launch, we offer the following comments regarding the proposed actions in Manhattan, Brooklyn, Queens, and the Bronx:

- **Consider next phase of CFS:** We recommend this analysis consider the next phase, or the “dotted line” of a sixth CFS route that is proposed but not yet planned, which would serve Coney Island and Stapleton, Staten Island. We have called for planners to define a clear process to implement the next phase of CFS, which would include setting clear metrics to define the success of this phase. Though no timeline is currently planned for ferry service delivery, Coney Island and Stapleton residents deserve consideration through this review process.

- **Consider demand for additional stops along Soundview route:** The Soundview route will also connect the Upper East Side with Lower Manhattan; however, this route bypasses E. 34th Street, part of the Midtown Manhattan central business district, and a “hub” connecting other ferry routes. Furthermore, Governor Andrew Cuomo recently announced plans for a major renovation to LaGuardia Airport, just across the East River from Soundview. That renovation would include a new ferry landing better connected to the main passenger terminal. We recommend that, where possible, this analysis consider the possibility that additional connections to E. 34th Street or LaGuardia airport may be sensible revisions to the proposed route.

- **Consider review of alternate location in Red Hook:** In Red Hook, many community members have expressed that Atlantic Basin may be a more accessible site for a ferry landing. We understand that security procedures for cruise terminal operations there present obstacles to year-round commuter service, but it is possible that a coalition of elected leaders and community groups may be able to negotiate a resolution in due time, if proposed sites for ferry landings in Red Hook (Sites 8a/8b) prove difficult for prospective riders to access. This analysis should consider Atlantic Basin as an alternate location for this district.

- **Consider alternative placement of Sunset Park ferry barge:** The proposed placement of the ferry dock (mid-way on the north east side of the pier) may inhibit docking for large tall ships and cultural vessels. Currently, the only cleats available for vessel berthing are behind the proposed ferry landing,
which would render them unavailable for other maritime users. To support the
variety of waterborne activity that may serve the community, as much length
of the pier as possible must remain unobstructed, and the deep water space,
which is only on this side of the pier, remain available. This analysis should
consider an alternative placement of the ferry barge further upland (east), or
on the southern pier face, to maximize the utility of this public space.

CFS is an important first step in restoring on-water transportation throughout the city.
We hope that its successful implementation can catalyze further expansion to other
districts, such as upper Manhattan along the Hudson River, or Throgs Neck in the
Bronx. Ferries may also be a key part of both interim and long-term solutions for safely
and efficiently moving commuters across the Hudson from New Jersey, where a failure
of the two rail tunnels would severely cripple our transit network and hamper economic
activity.

We thank you for your review of this important project, and look forward to providing
additional comments as part of the next phase of the environmental review process in
spring 2016. Please feel free to reach out to me directly at (212) 935-9831 x101 with
any questions.

Sincerely,

Roland Lewis
President and CEO