June 3, 2016

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 Final Scope of Work

Dear Ms. Pisani,

On behalf of the Waterfront Alliance, I submit these comments regarding the Draft Environmental Impact Statement (DEIS) for Citywide Ferry Service (CEQR No. 15DME009Y) and thank you for incorporating public feedback on the project’s environmental review.

As the region’s premier advocates for expanded ferry service to link New Yorkers in far-flung transit deserts to jobs and opportunity, the Waterfront Alliance was thrilled with the announcement of Citywide Ferry Service last year and is pleased with the project’s momentum.

We were pleased to submit comments on the Draft Scope of Work in October 2015, and we applaud the following additions and revisions to the DEIS that correspond to those comments as well as other feedback from important stakeholders:

- An expansion of the analysis to include additional landing locations in Red Hook, especially Atlantic Basin, which has strong community support as a potential ferry landing for Red Hook from prior community planning processes, including the Red Hook NY Rising Community Reconstruction Plan.
- The indication that standard operating procedures will be developed to address other maritime activities, including recreational boating.
- The inclusion of a possible centralized homeport in Brooklyn to reduce vessel travel distance at the beginning and end of each service day.
- Pedestrian circulation and safety improvements at several of the landings.

We offer the following comments on specific sites proposed by this project as well as the overall general scope of the project:

- **Consider next phase of CFS:** We are discouraged by the lack of inclusion of the Coney Island and Stapleton locations, which were previously proposed as a future route to follow the initial phases of implementation in 2017 and 2018. We recommend this analysis consider the next phase, or the “dotted line” of this sixth CFS route that is proposed but not yet planned. 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 alternative placement of Sunset Park ferry barge: The placement of Brooklyn Army Terminal (site 13) landing barge should be reconsidered. The proposed placement may inhibit docking for larger educational, cultural, and recreational vessels important to this community, as only the north side of the pier can accommodate such vessels. The analysis should consider an alternative placement of the ferry barge farther upland (east), or on the southern pier face, to maximize the utility of this public space.

Clarify design of E. 62nd Street landing to ensure safe navigation: Conflicting information is provided regarding the design of the E. 62nd Street landing to protect it from traffic in the main channel of the East River: Figure 1-4C shows the construction of an in-water structure between the landing and the main channel, but the text describes fenders installed along the bulkhead. Given the importance of obstructing the East River as little as possible to provide for safe navigation, the design described in the text is preferred.

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 has 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 year-round, regular service to Governors Island: This analysis should expressly consider the possibility of year-round, regularly-scheduled service to Governors Island (Site H), which would provide access not only to open space for underserved residents of southern Brooklyn, but also educational access to the New York Harbor School and other cultural and economic development opportunities. We are discouraged that the DEIS indicates that “alterations to Yankee Pier to accommodate additional ferry landings as part of the Citywide Ferry Service may be undertaken by TGI independent of the proposed project.” They should be considered as part of this project.

We also offer the following additional comments on further sections of Final Scope of Work (Scope) for the DEIS as enumerated below:

Land Use and Transportation
To improve integration with the larger transportation network, the DEIS should address the possible extension of bus and bicycle routes to ferry landings. We are pleased with the diligence taken to determine parking impact in Soundview. The DEIS projects that demand for parking would peak at approximately 50 spaces, and we are pleased to see that this could be accommodated on-street or—if built as proposed—a parking lot at the adjacent marina.

Open Space
The text regarding standard operating procedures for ferry operations in the vicinity of other maritime activities, including recreational boating, should indicate that these procedures would be undertaken, rather than that they may be undertaken. This should include procedures for reducing ferry speeds when in conflict with other vessels,
especially smaller recreational water craft, and at landings where on-water recreational facilities are prevalent.

Natural Resources
Consistent with previous comments made during the draft scoping phase, we applaud the measures that may be included to minimize natural resource impacts due to shorefront wake action. However, the text should indicate that these measures would in fact be taken, rather than may be taken.

Air Quality and Greenhouse Gas Emissions
To reduce adverse local impacts to air quality, we encourage the City and the operator to continue to push for the best available vessel technology and implement emission reduction measures. We are pleased with the conservative approach taken in the DEIS in which a credit was not taken for emission reductions due to automobile drivers opting to take the ferry rather than driving. We are also pleased to see the analysis conclude that CFS is consistent with the enhancing the city’s transit system and efforts to reduce the city’s overall carbon footprint, and would not result in a significant adverse impact to regional air quality.

We thank you for your review of this important project, and look forward to working with 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.

Please feel free to reach out to me directly at (212) 935-9831 x101 with any questions.

Sincerely,

Roland Lewis
President and CEO

cc: Dina Rybak, Assistant Vice President, NYC Economic Development Corporation