



CITY OF NEW YORK

**MANHATTAN COMMUNITY BOARD FOUR**

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**CHRISTINE BERTHET**  
Chair

**ROBERT J. BENFATTO, JR., ESQ.**  
District Manager

February 24, 2014

Owen Wells  
Director of Environmental Review  
City of New York Parks & Recreation  
The Arsenal  
Central Park  
New York, NY 10065

Adam Ganser  
Director of Planning and Design  
Friends of the High Line  
The Diller – von Furstenberg Building  
820 Washington Street  
New York, NY 10014

**Re: EAS (negative declaration) for The High Line, Section 3**

Dear Mr. Wells and Mr. Ganser,

We thank you for your participation at the Waterfront, Parks and Environment Committee on Thursday February 13, 2014. Manhattan Community Board 4 continues to be a supporter of the High Line and its further development. While we look forward to the completion of Section 3 of the High Line, we do have several concerns as expressed below.

The Environmental Assessment Statement you reviewed with us contains ample description of the project itself, but it does not comment on several of the Board's concerns. While we understand that these concerns are not required to be addressed in the EAS and that a Negative Declaration was issued on January 25, 2012, the Board is urging you to push beyond the requirements as these environmental issues are important to our community. Both the NYC Department of Parks and Recreation (DPR) and Friends of the High Line have the opportunity to become prototypes encouraging other developers to follow suit. In addition you have the unique opportunity to provide public education about environmental protection in our community. Stormwater capture, recycling and composting, as discussed below, should be included in each of DPR's new projects and especially in this High Line project.

**Stormwater**

It is clear that the plantings on the High Line capture and retain a portion of the rain water falling on it. However, there is much it does not capture. The excess rain water is directed to the City's stormwater system and is thereby directed either to the North River Sewage Treatment Plant or as overflow along with raw sewage into the Hudson River Estuary. This need not be the case in

Section 3 as the developers could include stormwater capture storage devices from which the water could be taken and beneficially used in dry periods.

### **Recycling**

The High Line is already collecting materials for recycling, particularly at the Chelsea Market Underpass where there are food vendors. We have been told that these vendors are using materials suited for recycling. The High Line could expand this program along its entire length by installing appropriate signage on its recycling containers while at the same time educating the public of the importance of reducing the stream of garbage in our city both by signage and by literature explaining how the materials destined for recycling are handled. One example is the Times Square Alliance's installation, in partnership with BigBelly Solar with funding from Alcoa Foundation, of 30 BigBelly solar-powered waste and recycling stations in Times Square.

### **Composting**

The garden on this narrow rail line does not provide much space for onsite composting. However, Section 3 gives the developers an opportunity to identify sufficient space for composting vegetative materials taken from these gardens offering the opportunity for public education by installing appropriate signage. In addition, the product of composting could be displayed and its beneficial reuse could be demonstrated. This would be particularly useful in light of current discussion of a new city wide residential compost collection program.

We note that members of the committee have offered additional suggestions subsequent to our meeting, including: Green Energy use for specific items on the High Line; solar power to provide power for WiFi; a demonstration wind power project to provide electricity to part of the High Line. These are offered as ideas only, but they suggest the wide variety of ways this project could be expanded to demonstrate more sustainable uses of our environment.

One final question: The EAS informs readers "residents within a half mile of the project site are currently underserved by public open space with approximately 1.01 acres of open space per 1,000 residents. This number is below the City's recommended ratio of 2.5 acres per 1,000 residents."(Page A-5) The Board is unclear how these numbers were determined. You offered to follow up on this issue especially in light of the planned residential construction over the rail yards.

Again, we thank you for your discussion with the Board on these issues, your willingness to consider implementing these procedures and look forward to continuing to work with you on the improvement of the High Line, and of parks in general, in our district.

Sincerely,



Christine Berthet  
Chair



Maarten de Kadt  
Co-Chair, Waterfront, Parks  
& Environment Committee



Delores Rubin  
Co-Chair, Waterfront, Parks  
& Environment Committee

Cc: Brad Hoylman, NY State Senator  
Richard Gottfried, NY State Assemblymember  
Jerrold Nadler, Congressman  
Gale Brewer, Manhattan Borough President  
Corey Johnson, NYC Councilmember