



CITY OF NEW YORK

MANHATTAN COMMUNITY BOARD FOUR

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COREY JOHNSON
Chair

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District Manager

April 12, 2012

Amanda M. Burden

Chair
City Planning Commission
22 Reade Street
New York, NY 10007

**Re: Midtown West EMS Station – site selection and acquisition of property at
512 West 23rd Street**

Dear Amanda:

On the recommendation of its Chelsea Preservation and Planning Committee, Manhattan Community Board 4, by a vote of 38 in favor, 3 opposed, 0 abstentions, and 1 present but not eligible to vote, voted at its regular board meeting on April 4, 2012 to recommend denial of the application by the New York City Fire Department (FDNY) for the site selection and acquisition of the project site located at 512 East 23rd Street unless the conditions detailed below are met.

The Fire Department's Bureau of Emergency Services (EMS) has been operating a temporary station (EMS Station 7) at this location since last November under a month-to-month lease from a private owner. The facility is currently a surface parking lot located under the High Line. The lot, approximately 3,650 square feet, currently accommodates office trailers for locker and bathroom facilities, pantry, medical and vehicle supply, and administration, as well as parking for seven ambulances. FDNY is seeking the selection and acquisition of its current temporary location in order to enter into a lease of unspecified length. FDNY has stated that a longer term lease would mitigate the unacceptable level of risk of losing the site without adequate notice to find another, and let them improve the site for their use.

According to FDNY, EMS vehicles typically are dispatched from street corner waiting sites throughout the area they cover, rather than from an EMS location. After delivering a patient to a medical facility they return to the station for cleaning and reprovisioning. It is important to minimize travel time between the station and the waiting sites, and between the area medical facilities and the station, because vehicles are not available for service during these periods. With the closing of St. Vincent's Hospital, which had provided ambulances as part of the City's emergency medical response system, in May 2010, all of the EMS stations in Manhattan

were located on the eastside. This made the identification of a westside location an acute necessity.

Manhattan CB4 recognizes the importance of a westside EMS station and appreciates the problems FDNY faces with a short term lease at their temporary location. However, the Board recommends denial of the proposed siting and acquisition unless significant location and operating issues, as enumerated below, are resolved.

Location & Siting

The description of the proposal accompanying the application states that FDNY has identified the project site as an optimal location for the five units (13 tours) relocated from St. Vincent's and an additional three units (eight tours). We are concerned that the use of the word "optimal" means that FDNY has no intention of investigating alternative sites that would be more suitable. The present temporary site is surrounded by residential buildings and is underneath the High Line, one of the most heavily visited parks in the city, and in fact is adjacent to one of the High Line elevator entrances. Even under optimal operating conditions, audible backup signals and occasional departures with siren are incompatible with the residential neighborhood in which the site is located. FDNY must conduct a thorough search for a more appropriate westside location, one not on a residential block, and not simply settle in at their current temporary location. The Board would be pleased to assist FDNY and DCAS in their search for a more appropriate site and requests a discussion of potential sites with these agencies on a regular basis.

Project Design

If FDNY obtains a longer term lease, significant improvements must be made to the site during the search for a permanent location. These improvements include the demolition of the old parking lot booth on West 23rd Street and the construction of a proper structure to replace the temporary trailers and further mitigate fumes emitted by vehicles. The design of any new structure should incorporate elements of the High Line to reflect the site's unique location under the park.

Exhaust Fumes

Exhaust fumes from idling ambulances are trapped and concentrated beneath the High Line, creating dangerous, unhealthy conditions for residents of neighboring buildings. FDNY states that while they are on site ambulances must idle in order to keep essential electrical systems operating. Adhering to the FDNY operating model presented to the committee should restrict the presence of ambulances on site to shift changes and decontamination/reprovisioning, but does not solve the underlying problem. We believe that the best solution would be the implementation of "shore power," which enables a vehicle's electrical systems to operate on power from the city's electric grid. Longer term, we recommend that the ambulance fleet be converted to operate on a cleaner fuel, such as natural gas. Finally, if a longer term lease is secured, the proposed station must be a fully enclosed garage and must be ventilated in a way that eliminates the exposure of residential units to the east and west to exhaust fumes.

Operations

Because EMS Station 7 is located on a residential block, there must be higher operating standards and greater compliance with operating procedures. Each of the areas described below, as well as the exhaust fumes issue discussed separately, has had a negative impact on the quality of life for residents of the community. The Board requests that FDNY present procedures addressing each issue to its Quality of Life committee and then meet as necessary to review compliance.

- **Sirens.** Although the operating model presented to the committee by FDNY calls for a minimal number of emergency dispatches directly from the station, this has not been followed, resulting in large numbers of ambulances leaving the facility with sirens on. FDNY must enforce their distributed dispatching model, with the station used only for shift changes, decontamination and resupply. FDNY must also present plans to turn sirens on only after leaving the facility so as to minimize repetitive siren noise affecting residents.
- **Backup Signals.** Although audible backup signals are governed by state law, proper operating procedures regarding vehicle parking and movement should minimize the disturbance they create for neighboring residences. The enclosed facility discussed along with the exhaust fume problem also would mitigate this noise problem.
- **Signage.** FDNY must install signage warning High Line Park users of the presence of the active driveway immediately adjacent to the High Line elevator. The signage must be visible from the elevator.
- **Parking.** EMS staff must not use placard parking in the neighborhood where residential and commercial parking is already very limited.
- **Maintenance.** Neighbors have complained of trash in lesser used corners of the site; FDNY must maintain a reasonable level of cleanliness on the site, beginning immediately.

CB4 appreciates the need for an EMS station on the westside and recognizes that its proximity saves lives, but the Board believes that the current project site, surrounded by residential buildings, is not a suitable permanent site. The Board recommends denial of the application for site selection and acquisition unless FDNY commits to an expanded search for a more suitable site on a non-residential block and to addressing operating issues that affect quality of life for neighboring residents. The results of such a search should be submitted to Manhattan CB4.

If this site becomes a permanent EMS location, the Board recommends denial unless:

- FDNY commits to building a fully enclosed garage structure of appropriate design reflecting its location beneath the High Line;

- Effective measures are undertaken to mitigate exhaust fumes from idling vehicles on site in the short term, and elimination of idling completely in the long term; and
- Proper operating procedures are implemented and followed to address identified issues affecting quality of life.

Thank you for your consideration in the siting process.

Sincerely,



Corey Johnson, Chair
Manhattan Community Board 4



J. Lee Compton, Co-Chair
Chelsea Preservation & Planning

[Signed 4/12/12]

Bret Firfer, Co-Chair
Chelsea Preservation and Planning

cc: Congressman Jerrold Nadler
NYS Senator Tom Duane
NYS Assembly Member Richard Gottfried
NYC Council Speaker Christine Quinn
Manhattan Borough President Scott Stringer
DCP – Erika Sellke, Edith Hsu-Chen
FDNY – David Harney