

**UNOFFICIAL GUIDE TO THE YANKEE
STADIUM DRAFT ENVIRONMENTAL IMPACT
STATEMENT (DEIS)**

Prepared by Lukas Herbert, AICP
Member of Community Board 4

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INTRODUCTION

This unofficial guide and analysis has been prepared in response to a need expressed to me by many members of the community who are faced with reading a 700+ page Environmental Impact Statement (EIS) if they want to learn the “ins and outs” of this incredibly complex, yet incredibly important project.

Reading a 700+ page document is a daunting task, especially when you have a life you need to live, a job you need to go to, families you need to take care of and a multitude of other day-to-day things to do that are just a part of everyday life. Reading a 700+ page document is even more daunting when it is filled with technical jargon, sometimes designed to influence or mislead the reader. This may particularly be the case if this is the first EIS that you have ever read.

Fortunately, I have had the time to read the EIS. I also have a lot of expertise reading EISs though my professional life as an urban planner. I am familiar with the format of these documents, and I have seen over the years how they have sometimes been used to sell projects which may have impacts that are detrimental to society. While the EIS process was originally intended to be used to identify serious environmental impacts which would then allow local decision makers and elected officials to take a “hard look” at the benefits and costs of a projects, modern EIS documents are often used as tools to discount the obvious environmental flaws of projects and prevent them from being considered as part of the “hard look” involved with the decision making. However, the EIS is the main source of public information when it comes to the details of any large project. It is therefore something we all should be able to examine thoroughly if we care about the decision that is to be made. This *Guide* attempts to bring some of this information to everyone in a way that is easier to read than pouring over a 700+ page document. It also offers opinions on the issues to show what some people are thinking about each issue.

The *Guide* is broken into several sections, as follows (they are not in any order of importance):

- Summary of Project Description
- Summary of Parking Concerns
- Summary of Parks Concerns
- Summary of Traffic Concerns
- Summary of Public Transit Concerns
- Summary of Air Quality Concerns
- Summary of Neighborhood Impacts
- Summary of Business Impacts
- Summary of Alternatives

Each of these sections is in the same format. They are broken into several sub-topics which **include direct quotes from the DEIS**. These quotes were simply cut out of the DEIS and pasted into the *Guide*. I did not have time to include the page numbers (I don’t have that much time...), but you can find them in the DEIS if you search the document. I have not augmented these quotes except on occasion to make the sentences more readable.

Following the EIS text, I have offered a suggested **response** to each of the subtopic issues. The response is not intended to speak for anyone else other than myself. It is my personal view which has been shaped by my discussions with other members of the community. These opinions are only intended to get the

reader thinking about his or her own responses to what the DEIS says by offering a point of view. They do not necessarily represent the opinions of Community Board 4, any City agency, the New York Yankees or anybody else.

I invite you to use this *Guide* as a way to inform yourself about the Yankee Stadium DEIS. However, please be warned: reading this *Guide* is not a replacement for reading the entire DEIS, which is the official document of public record for this project.

SUMMARY OF PROJECT DESCRIPTION

PROJECT DESCRIPTION

Draft EIS states:

New stadium would have a capacity for 54,000 spectators (53,000 seats and 1,000 standing spaces) and would replace the existing 56,928-seat, outdated 82-year-old Yankee Stadium with one that can effectively accommodate a modern baseball team and provide greatly improved spectator and parking facilities.

The footprint of the stadium, at 8.5 acres, is also too small. To supply the current requirements for comfortable seating and for circulation, food, shops, restrooms, and other support areas, the footprint for a modern stadium would have to be at least 12.5 acres.

the overall building size, at 873,163 gross square feet, is inadequate. Each floor plate must be increased by approximately 45 percent in order to accommodate the seating and service demand of a modern stadium. As it stands now, Yankee Stadium cannot comfortably handle attendance greater than 35,000; at that point, the hallways are crowded, long lines form for the food concessions and bathrooms, further interfering with pedestrian flow, and the kitchens and other support facilities are inadequate to meet the demand.

Adequate practice space and batting cages are lacking, and there is only one weight room, which must be shared by both the Yankees and visiting teams.

The total built floor area for the proposed stadium would comprise approximately 1.3 million square feet.

Although its seating capacity is sufficient, there is not enough space to support the fans and players or to offer appropriate food and other services.

By any measure of a modern ballpark other than the number of seats, the existing Yankee Stadium is too small and functionally inadequate.

The stadium sits on a site of just under 10 acres, compared to the more than 13.0 acres that a state-of-the-art facility requires.

Approximately 53,000 seats for viewing baseball are planned at a split of approximately 65 percent lower bowl to 35 percent upper bowl seating, the reverse of current conditions. Sightline clearances would be maintained for all seats, and aisles that have seats on both sides would be 4 feet wide with proper hand rails. All seats except bleacher seats, which would be bench seats, would have self-rising armchairs, and most would have cup holders. Specified standing room for 1,000 spectators would also be provided, bringing the capacity of the stadium to 54,000 spectators.

The proposed project would result in the construction of a new park with ballfields, esplanade, and surface parking on the west side of Exterior Street at the Bronx Terminal Market

In the early 1970s, the team proposed moving to New Jersey. To retain the Yankees in New

SUMMARY OF PROJECT DESCRIPTION

York, the City signed a 30-year lease with the Yankees in 1972, the same year that George Steinbrenner bought the team and agreed to renovate the stadium.

Surrounding the proposed stadium on River and Jerome Avenues and on East 161st Street would be large pedestrian gathering areas that would include decorative paving, landscaping, and other amenities such as seating areas and sculpture (see Figures 7-30, 7-32, and 7-33).

It is intended to be a facility for the future, with the soul of the past.

Response:

The Yankees have made it clear that they want a modernized facility, with more space and more amenities, for their team. No longer will the majority of the seats be on the upper deck. No longer will the seats be too narrow for today's expanded waistlines. No longer will the concourses be crowded with people, and the lines to buy a hot dog too long. No longer would the Yankees have to share a weight room with the opposing visiting team. The new stadium would fix all of these problems – plus you'd get a stadium that reminds you of a past stadium that was destroyed....AND you'd get a cup-holder at your seat. There would also be more parking. And the team would not move to New Jersey, a perennial threat that most New Yorkers have learned to simply ignore.

While a new stadium sounds good to a lot of people, it will come at a price – a price that will be exacted mainly from the community and local taxpayers. There are a host of alternatives that can be explored, but the DEIS has discounted all of them but one. The preferred alternative will give the Yankees exactly what they want, but the true costs must be taken into account before the decision gets made to build. Subsequent sections of this analysis attempt to shed light on some of these costs.

LUXURY BOXES

Draft EIS states:

Suites. Approximately 60 suites would be provided, which would have fixed-seating capacities of 12 to 16, plus some additional room.

Premium Seat Lounges. Several lounges would be available to premium seat-holders, as follows:

- *The Legends Suite Lounges* would provide Legends suite seat-holders lounges with food and beverage service, including the Legends Suite Home Plate Lounge, which would be located behind home plate with an entrance from the Main Concourse, allowing direct access to the Legends suites. Glass frontage would provide natural light and views to the field.
- *The Grandstand Sports Club* would be an enclosed, air-conditioned suite seating area and lounge located directly behind the centerfield wall. It would consist of approximately 400 tiered seats within the suite that view the field and a lounge with seating and light food service. The club would be accessible from the stadium concourses.
- *The Stadium Club* would be a full service restaurant and bar located in the left field corner at the Suite Level with dining both within the club and on a terrace, which would provide a view of the field in a conditioned environment.

SUMMARY OF PROJECT DESCRIPTION

Response:

It is clear that the proposed stadium project includes a substantial component for wealthy and/or corporate patrons. These are facilities designed to evoke exclusivity – a separation from common people – and provide an insular environment for those well-off enough to pay for it. American society has accepted and embraced this concept as a part of our free-market system. However, the provision of luxury amenities should not be the driving force behind a new stadium project. It is a symbol of America's increasing divide between rich and poor, and it projects an image to others around the world that we are a nation separated by class.

Increasing the supply of luxury boxes in stadiums has become a reality in the professional sports world which we all must learn to live with. However, any new stadium project should ideally be constructed for other reasons beyond the provision of more luxury seating.

RETAIL & RESTAURANTS

Draft EIS states:

Retail. The main team store selling Yankees' merchandise would be at two levels in a prominent location, allowing entry from within the stadium. Two smaller satellite stores selling Yankees' merchandise would be located away from each other and from the main retail store to allow for better access to retail outlets for fans throughout the stadium. Novelty stands would also be provided throughout the concourses, distributed proportionately at high-traffic areas.

Restaurants. An approximately 300-seat restaurant located at street level would provide yearround operation with direct entry from outside the stadium, as well as access to the stadium concourse

Response:

The proposed new retail and restaurants will likely compete with local businesses. This should be examined in greater detail in the DEIS.

COST OF PROJECT

Draft EIS states:

State and City funding for the non-stadium portions of the proposed project.

Estimated net total construction costs for the park space (\$95.5 million in 2006 dollars) and parking garages (\$234.8 million in 2006 dollars) were provided by NYCDPR and NYCEDC, respectively.

The analysis is driven by the annual revenues that would be generated by the parking garages—approximately \$3.8 million (in 2009 dollars), according to NYCDPR.

SUMMARY OF PROJECT DESCRIPTION

The analysis of the stadium construction impacts is based on a total construction cost of \$749 million (2006 dollars).

City would spend a cumulative total of \$574 million on stadium upkeep. The proposed project would replace that stadium, and the City would experience a capital savings of \$574 million over the next 30 years.

At the same time, the City currently collects rent on the existing Yankee Stadium. These are revenues that the City will no longer collect if the proposed stadium is constructed. According to ERA, this rent would amount to a cumulative total of \$497 million over the next 30 years. This means that the net gain to the City (the capital savings less the foregone rent) would be approximately \$77 million over the next 30 years.

Response:

The DEIS makes the statement that the Yankees will only pay for the new stadium. Other costs (construction of parking, construction of replacement parkland, demolition of old stadium, traffic mitigation improvements, etc) will either be paid for by the City, State or someone else. While it is good to see the Yankees offering to pay for their own stadium (as opposed to demanding the City build it in exchange for them not relocating to New Jersey), simply paying for the stadium cost itself is not enough. The Yankees will still be getting a very sweet deal financed by taxpayers with environmental costs to the community.

The analysis concerning the cost of maintenance of the current stadium versus future rent payments is misleading. According to the analysis, the city would lose \$77 million dollars since the maintenance costs of keeping the old stadium would be higher than the rent costs. However, this amount is still less than the huge capital outlays that the city would have to make to build the non-stadium portions of this project.

CONSISTENCY WITH LOCAL PLANS

Draft EIS states:

The proposed project would also be consistent with the Bronx Borough President's new Bronx Waterfront Plan and Yankee Stadium Neighborhood Development Plan, as it would provide publicly accessible waterfront recreational space, and provide a new stadium and publicly accessible fields on the existing stadium, thereby achieving several of the plans' goals.

Response

The above statement notes that the proposed project is consistent with *several* of the plans' goals. However, the word *several* does not mean *all* or *most*. A project that incorporates only some elements of a politically endorsed plan, may not embody the true intention of that plan...and may actually be worse than completely disregarding the plan depending on what is proposed.

SUMMARY OF PROJECT DESCRIPTION

The project as proposed will harm the local community (as is noted in subsequent sections of this analysis). It should not be praised as conforming to any locally initiated plans.

CONCLUSION: PROJECT GOALS AND OBJECTIVES

Draft EIS states:

PROVIDE A MODERN STADIUM THAT CAN ADEQUATELY SUPPORT BASEBALL AND STADIUM OPERATIONS, PLAYERS, AND THE MEDIA

- Provide adequate parking.
- Create efficient and attractive pedestrian circulation space.

MINIMIZE ADVERSE IMPACTS AND IMPROVE CONDITIONS IN THE SURROUNDING NEIGHBORHOOD

- Provide adequate off-street public parking and areas for pedestrian circulation.
- Replace displaced recreational facilities with equal or better facilities within the area.
- Reduce any adverse impacts of the proposed project to the extent practicable.

Response:

The above (selected) goals and objectives of the project show how the project is insensitive to the needs of the community, and the needs of the region.

As is explained in subsequent sections of this analysis, the provision of “adequate parking” is simply the construction of large, obtrusive parking structures within the community that will serve to attract additional automobile trips to Yankees games. “Efficient and attractive pedestrian circulation space” is designed to route fans to the stadium more quickly from parking structures, and away from local businesses.

The adverse neighborhood impacts of this project are immense. Again, more parking is seen as the save-all solution for a problem of traffic congestion as opposed to more transit service. A wide-spread destruction of local parkland will be replaced by “parks” atop parking structures. Neighborhood, visual, business and air quality impacts (among others) will also be substantial.

This analysis is intended to shed light on all of these proposed impacts, which when taken as a whole, add up to a great injustice for the local community.

SUMMARY OF PARKING CONCERNS

SUMMARY OF PARKING CHANGES

Current Parking Supply	Loses of Parking	Gains of Parking
7079	-1350 to be displaced by new project structures	+5254 in new parking garages A, B, C and D
	-882 off-street spaces lost by new Bronx Terminal Market project (Gateway)	

7079 – 2232 + 5254 = 10,101 (new off-street parking total for stadium)

Additional supplemental gains and losses off-site include:

- A **loss of 800 spaces** (on and off street) associated with Exterior Street, which would be developed for the Gateway Center Project.
- A **gain of an unspecified number of spaces** through the expansion of Lots 13A and 13B on the Harlem River waterfront
- A **gain of approximately 1200 parking spaces** at the new Gateway Center parking structure that are estimated to be available at game times.

These items alone are a gain of 400 spaces plus whatever else is built at Lots 13A and 13B

DESCRIPTION OF NEW PARKING FACILITIES

Parking Garage A would be a two-level garage located partially below-grade between East 157th and East 161st Streets and the Macomb’s Dam Bridge Approach and the site of the existing stadium. The garage would accommodate approximately 2,391 spaces; new recreational facilities that could be accessed from street-grade would be located on its roof.

Parking Garage C would be a four-level garage located west of East 161st Street between Jerome Avenue, Macomb’s Dam Bridge Approach, and the Major Deegan Expressway. The proposed site of Parking Garage C is currently located in a portion of Macomb’s Dam Park and contains a surface parking lot with access from East 161st Street. approximately 994 spaces.

Parking Garages A and C, would be connected at one level below-grade and designed to function as one efficient garage complex with separate access points.

Parking Garage B would be a five-level above-grade (including one level of roof parking) garage located south of East 164th Street at the northern end of the proposed stadium and north of the service road. The garage would accommodate approximately 920 spaces with one entire level located below-grade and five levels above-grade

Parking Garage D would be a five-level above-grade garage (including one level of roof

SUMMARY OF PARKING CONCERNS

parking) located south of the proposed stadium at East 151st Street between River and Gerard Avenues. The garage would accommodate approximately 949 spaces. Two-way access would be available at River and Gerard Avenues. Parking Garage D would extend over East 151st Street at the third, fourth, and roof levels.

Parking Garage D could be developed with a non-destination retail component of approximately 12,000 gsf along the street level of the garage.

Existing Yankee Stadium Parking Lots 13A and 13B are located west of Exterior Street between the Bronx Terminal Market and the Macombs Dam Bridge. The proposed project would repave and restripe these existing lots and create new surface parking, as a southern extension to existing Yankee Stadium Lot 13A.

Response:

Using the above figures, the project involves a net increase of parking around the site of at least 3422 spaces. While the applicants make it clear that they believe this additional parking is “required” they do not talk about ways to get people to the stadium without driving a car. We have asked them to explore expanding transit options to the site, but so far, no attention has been paid to this concern. It would clearly be better for everyone in the community if more people can get to and from the stadium without driving – there would be less traffic, less pollution, etc. With all the talk about diminishing oil supplies and America’s over-dependence on foreign oil, increasing parking to encourage driving is a step in the wrong direction.

In addition parking lots B and D would be particularly massive – being 5 stories in height. Parking lot D would also span 3 levels of parking as a bridge over 151st Street. This is an unfair visual burden that the neighborhood would have to endure to provide parking for events that occur only 80 days a year. If the community cannot park in these facilities the rest of the year, why should the community have to look at them?

Parking lot 13A should not be expanded. Surface parking is not an appropriate use for waterfront property that the community should be enjoying.

JUSTIFICATION FOR NEW PARKING

Draft EIS states:

Parking for the existing stadium is insufficient, widely scattered, and has spilled over into the surrounding neighborhood. There are only 7,079 parking spaces currently available for Yankee Stadium patrons in surface lots and garages within an approximate ½-mile radius of the existing stadium. The proposed project would displace approximately 1,350 parking spaces in existing lots.

In response to the proposed stadium’s parking need, the proposed project would develop four new parking garages containing approximately 5,254 spaces and would add spaces in existing and expanded surface parking lots, bringing the total number of spaces available for Yankee Stadium

SUMMARY OF PARKING CONCERNS

patrons to 10,101, for a net increase of 3,022 off-street spaces.

Proposed parking would reduce the spill-over conditions on local streets that presently exist.

The current off-street parking space inventory is 7,079. Of these, approximately 3,500 are located within a ¼-mile (a 10-minute walk) of the stadium. These spaces are filled whenever game attendance reaches approximately 15,000. All spaces are filled when game attendance reaches approximately 30,000, a level that has been exceeded regularly in recent years at Yankees home games. Overflow parking is accommodated, when possible, in the Bronx Terminal Market south of the stadium, and along public streets.

Decreased traffic circulation on local streets in search of available parking spaces and less parking on the local streets themselves would provide a benefit to the local community.

Response:

The applicants are making the argument that since people cannot park with a great deal of ease when going to a game, the only solution is to increase parking. However, that is not likely to solve the problem. If parking gets easier to find, more people will likely drive to the games. Instead, the Yankees and the City should look to solve the problem by getting more people to use public transit to get to the games: either by subway, bus, ferry or by providing a new Metro-North station at the stadium and enhanced service to the nearby Melrose station.

In addition, providing more parking will likely create an “induced demand” effect where more people start driving to the games simply because parking is easier to find. During the public hearing for the Draft Scope of Work, several people asked that this common traffic phenomenon be explored and examined in the draft EIS. While the Final Scope of Work states on page A-15 “The DEIS will address the issues of modal split and induced demand” in response to community concern, the issue was not, in fact, addressed at all in the DEIS. This breach of protocol has resulted in an incomplete DEIS document which should not have been accepted as complete by NYCDPR.

Simply throwing more parking into the equation is a dated urban planning principle that was innovative in the 1950’s. In the 21st Century, we need different solutions – solutions that will cut down on energy and pollution. Doing so, will also cut down on traffic circulation on local streets and illegal parking, which the applicants claim as project goals.

DEMAND FOR NEW PARKING

Draft EIS states:

In 1923, most fans came to games at the then-new Yankee Stadium by public transportation. In the ensuing years, with the rise of the automobile and the spread of the suburbs, driving to the game became more and more popular. The number of parking spaces provided has increased steadily over the years, including in garages built in the 1973 renovation, but has not kept pace with demand.

SUMMARY OF PARKING CONCERNS

Average game attendance has exceeded 35,000 every year since 1999. The peak was last year, 2004, with an average game attendance of 47,788 and a season total of 3,775,292. Given the constraints and limitations of existing Yankee Stadium, each year that attendance has grown, the problems of accommodating that demand have become more frequent and more difficult.

The increased provisions of parking garage spaces under the proposed project is aimed at accommodating fans who currently park at relatively remote locations or who park illegally on City streets or on the service road of the Major Deegan Expressway and who circulate excessively in the area in search of hard-to-find legal parking spaces.

Response:

Just because driving to the game has become “more popular” does not mean that we should be supporting this trend. Driving to the game costs this community dearly in terms of both congestion costs and pollution. In 1923 most fans arrived by public transportation. However, since 1923 we have had substantial improvements made to our regional transit system and we now have the ability to reach far into suburbia with fast and efficient transit service. More projects such as the NJ Transit Access to the Regions Core, LIRR East Side Access, and the proposed new Metro-North across a rebuilt Tappan Zee Bridge all have the potential to bring more fans to the stadium via transit. With all of the problems with oil consumption and with all of the health problems caused by driving (asthma, obesity, etc.) this project should position itself to take advantage of the great sums of public money being spent on these transit improvement projects. The project should NOT simply try to re-enforce a wasteful and disruptive trend (automobile driving to a game) simply because its “popular”.

AVAILABILITY OF “UNOFFICIAL” OFF-SITE PARKING

Draft EIS states:

A substantial amount of parking activity also occurs both on-street and in other unofficial off-street areas. For example, off-street, additional parking occurs “behind” the existing Bronx Terminal Market buildings west of Exterior Street, i.e., between the buildings lining the west side of Exterior Street and the Harlem River.

There is also a significant amount of parking that occurs within the lower parking level of the Concourse Plaza Shopping Center. This shopping center has a posted capacity of approximately 1,200 spaces overall. It is open 24 hours per day, seven days a week. Yankees fan parking takes place on the below-grade level, with several hundred parking spaces typically available on game days.

Overall, there are approximately 3,216 legal parking spaces available on-street within the entire area surveyed (over 300 blockfaces). During the hour(s) immediately preceding a weeknight game, curb parking occupancy increases to approximately 100 percent until game time. After 7 PM, occupancy of curb spaces increases to 110 percent of capacity, as virtually all legal spaces are used and illegal parking and double parking occurs, with hardly any legal spaces available for use. This means that the total number of vehicles parked on-street is greater than the number of legal spaces available.

SUMMARY OF PARKING CONCERNS

Response:

The applicant is again trying to use the argument that because it is not easy to find a lot of parking for a game, you simply just need to build lots and lots more parking. Besides encouraging transit use, the Yankees should consider working out arrangements with existing lots which may not be used to peak capacity during game times. These lots might include Concourse Plaza Shopping Center and other privately owned lots (such as the public parking lot in 1020 Grand Concourse, among others)

IMPACTS OR RESULTS OF INCREASED PARKING

Draft EIS states:

representing a net addition of approximately 3,022 spaces above existing parking supplies— would make it easier for fans driving to games to park closer to the stadium, resulting in less circulation on local streets in search of the currently often hard-to-find parking spaces.

(1) the proposed project would provide Yankees fans with thousands of new parking spaces close to the proposed stadium, thus relieving the area of excessive traffic circulation pre-game as motorists would no longer have to circulate on local streets in search of hard-to-find parking spaces, especially on sellout game days; (2) the proposed project would also eliminate some illegal parking on local streets and on the service road of the northbound Major Deegan Expressway since the parked cars could now be accommodated within off-street parking lots and garages; (3) the proposed project would result in a shift of vehicular traffic from some currently used traffic routes to others, primarily to streets such as Jerome Avenue, the Macomb's Dam Bridge Approach, River Avenue, and others;

The additional parking would not have a substantial effect on the residential desirability of the study area since it is accessory parking for stadium patrons only.

Similarly, the additional parking spaces proposed for the proposed stadium would not substantially affect the study area's economic conditions, as that additional parking would be used as accessory parking reserved for stadium patrons only.

Response:

The location of more parking closer to the stadium than where it is today would likely mean that less people would be walking by local businesses on the way from their cars to the stadium and back. This would mean less opportunities for fans to shop at these businesses, thus having a potential negative impact on them.

The parking would not be available to the community to use on non-game days. This is not appropriate. If the community has to put up with looking at ugly parking structures all year and dealing with the traffic they cause, then they should at least get to use them.

SUMMARY OF PARKING CONCERNS

FINANCIAL IMPACTS OF PROPOSED PARKING

Draft EIS states:

The proposed garages, along with existing parking facilities in the area, are anticipated to be leased to private operators.

Based on preliminary estimates, construction investments for the proposed parking garages would amount to approximately \$234.8 million (2006 dollars). Similar to the park construction cost estimate, this figure includes site preparation and hard costs (actual construction), as well as design, legal, and other soft costs. It reflects the cost of physical improvements to the sites, and therefore excludes other values (such as the value of the land) not directly a part of the expenditures for construction. The total cost—including the value of the land—would be more.

As shown in Table 3-10, the operation of the proposed parking garages would generate approximately \$0.27 million in additional tax revenues for the City, \$0.25 million for the State, and \$0.02 for the MTA in 2009, for a total annual fiscal impact of \$0.53 million.

Similarly, the additional parking spaces proposed for the proposed stadium would not substantially affect the study area's economic conditions, as that additional parking would be used as accessory parking reserved for stadium patrons only.

Response:

The financial analyses presented in the DEIS does not make it clear who is paying to construct the garages and who is receiving the revenue. From the way it is written, it appears that the City is paying to construct the garages, but someone else will keep the parking revenue. This explains why the City's "benefit" is only \$270,000 in parking tax revenue. This needs to be made clear for everyone so people know who is paying and who is making the money.

If the City is involved with paying for these garages in any way, then it is only right that the facilities be kept open year round – and that any member of the public be able to use them to park a car. The taxes of NYC residents should not be spent to subsidize parking intended only for out-of-towners who drive into our neighborhoods and diminish our quality of life as a result.

ULURP APPROVALS

Draft EIS states:

The proposed project would require special permits pursuant to Sections 74-512 and 74-54 of the Zoning Resolution to permit Garage D, a site zoned for manufacturing use. The proposed parking garage would be compatible with the surrounding manufacturing, parking, and institutional land uses in the area. The special permits would also exempt the floors of the garage located below a height of 23 feet above street level from the definition of floor area, allow rooftop parking (which would be screened), and allow for modification of rear yard requirements. If approved, Garage D would also occupy a volume above the bed of East 151st Street.

SUMMARY OF PARKING CONCERNS

Response:

This special permit should not be granted. The proposed parking structure would be a hulking, massive intrusion into the community. Placing 5 stories of structured parking, 3 of which bridge over a street, is not acceptable in a neighborhood where people live only a block away.

Furthermore, the Gateway Center will be constructed directly across River Avenue. A five-story parking structure bridging over a street may not be compatible across the street from the street-level retail that the Gateway Center will include (as per Community Board conditions placed on their ULURP approval). While remaining land uses near the site are industrial in nature, this may not always be the case as neighborhoods can change and improve over the years. Constructing a hulking, massive parking structure in this location, however, will serve to ensure that things do not improve in this part of the neighborhood.

Also, the garage would not include parking for Gateway Center shoppers immediately across the street when there are no games. Opening up this garage for Gateway shoppers would lessen the burden of Gateway to provide parking, and could instead allow them to use more of their space for non-parking uses.

SUMMARY OF PARKLAND CONCERNS

SUMMARY OF PARKS CHANGES

Existing parkland to be displaced: **22.42 acres**

Of the displaced parkland, **10.22 acres would have new parkland put back on it** (above parking garages)

15.82 acres of land would be mapped as new parkland

1.01 acres of “open space” will be created, which is not to be mapped parkland

Net increase of **4.63 acres total open space** or **3.62 acres of parkland**

New facility	Built where parkland exists now?	To be mapped as parkland	Acreage
“Park” on top of Parking Garage A (track)	Yes	Yes	7.33
Rupert Plaza	No	Yes	1.13
“Heritage Field” (old partially demolished stadium)	No	Yes	8.9
Tennis courts on top of Parking Garage C	Yes	Yes	2.89
“Passive park area” on 157 th Street	No	Yes	0.24
“Passive park area” on 157 th Street	No	Yes	0.44
Ballfields on Harlem River	No	Yes	5.11
“Open space” around Parking Garage B	Yes	No	0.3
Harlem River Esplanade	No	No	0.71 (acreage includes land under water)
TOTALS	10.22 acres “new” parkland to be placed within old parkland	26.04 acres to be mapped as parkland	1.01 acres of open space, not to be mapped as parkland

In addition to the above it is also noted that the underwater land beneath Slips 2 and 4 of the Harlem River, and 0.4 acres south of Pier 1 along the Harlem River that is proposed as new surface parking, would be also mapped as new parkland. However, these mapped parkland areas would contain no public recreational facilities and so are not counted in the tally of proposed parkland to be created by the proposed project.)

SUMMARY OF PARKLAND CONCERNS

ALIENATION OF PARKLAND

Draft EIS states:

As described further below, the proposed project would require the alienation of certain areas of mapped parkland to allow for its disposition by NYCDPR through leases, for operation of the proposed stadium and several new parking garages. These areas would, however, remain mapped parkland. In addition, new areas of mapped parkland would be created to provide additional new open space and to accommodate park facilities displaced by the new stadium and garages. Overall, the proposed project would result in a net increase of approximately 4.63 acres of accessible recreational facilities and parkland within the project area.

New York State legislation enacted in June 2005 authorizes the alienation of certain areas of currently mapped parkland—portions of Macomb’s Dam and John Mullaly Parks—to allow for its disposition by the City, through leases, for operation of the proposed stadium and several parking garages. Following that disposition, however, these areas would remain mapped parkland.

The State legislation also requires that the City dedicate the existing Yankee Stadium site as parkland and acquire additional parklands and/or dedicate land for park and recreational purposes which are equal to or greater than the fair market value of the parkland being alienated.

The State legislation also requires that the City dedicate the existing Yankee Stadium site as parkland and acquire additional parklands and/or dedicate land for park and recreational purposes which are equal to or greater than the fair market value of the parkland being alienated.

Response:

The State and City should not have alienated public parkland to create space for a private entity (the Yankees) to use for a new stadium and for parking that will not be open to the public to use unless they are attending a Yankees game. This is taking a public use (park) away from the public and giving it over to a private use (stadium and parking). This is not fair to the community.

While new replacement facilities have been proposed, they are not equivalent in quality and location compared to the existing facilities. Even though some of the existing facilities are worn out and old, they are superior to new facilities that would be constructed atop parking garages or located in out-of-the-way places that nobody can easily get to. This is examined in greater detail below.

State and City officials were wrong in voting for this alienation of parkland. While some claim that they believed at the time that they were getting “a fair trade of parkland for parkland” it is clear that a fair trade is not part of the arrangement. Elected officials who voted for the alienation should now consider withdrawing support from the project due to the bad deal the community is getting. Local community members should consider running and voting for alternative candidates at the next election if the elected officials continue to support this bad deal.

SUMMARY OF PARKLAND CONCERNS

COSTS OF NEW PARKLAND

Draft EIS states:

Based on preliminary estimates, the net construction investments for the proposed park space would amount to approximately \$95.5 million (2006 dollars). This figure includes site preparation and hard costs (actual construction), as well as design, legal, and other soft costs.

According to NYCDPR the total construction cost for the proposed park space would be \$101.3 million. However, absent the proposed project, approximately \$5.7 million would be spent on physical improvements to Macomb's Dam Park and these improvements would not take place in the future with the proposed project.

Without the project, proposed open space would include a waterfront esplanade along with a larger lawn area along the waterfront containing benches and landscaping. As shown in Figure 4-7, a portion of the proposed esplanade would run along a portion of the western boundary of the Yankee Stadium project area. The large waterfront park area that is part of the Gateway Center project would be immediately south of the Yankee Stadium project area.

The second project would improve the active recreational facilities in the portion of Macomb's Dam Park located north of East 161st Street (see A on Figure 4-1) with funds from the New York City Department of Environmental Protection (NYCDEP) water filtration plant project. The improvements would include installation of a synthetic turf soccer field, lighting around the track, reconstruction of the bleachers, and construction of a comfort station.

Outside the project area, the fountain on the triangle portion of Macomb's Dam Park located between Woodcrest and Ogden Avenues (Parcel G on Figure 4-1) will be repaired. This NYCDPR project will restore the existing stone work, stairs, and pathways in the park. Additionally, improvements will be made to the northern portion of John Mullaly Park (see K on Figure 4-1), also with funds from the NYCDEP project, including reconstructing the playground and constructing a spray shower and comfort station. It is anticipated that both of the park improvement projects outside the project area will be completed by 2009.

Response:

The DEIS states that money is already programmed to be spent in our local parks if the stadium project does not happen. If the new stadium gets built, these improvements will not be made, but rather, the parks will be wiped out and new park facilities will get built. So in essence, if the stadium does not get built, the community gets improved parkland anyway. Building the stadium will essentially replace our current facilities – which are programmed to be improved – with facilities that nobody wants.

What is interesting is that one of the already pre-programmed improvements is a waterfront esplanade, which is being touted as part of the project. Therefore, the Yankees should not be given credit with bringing this esplanade to the community, since it was already planned anyway. The potential for this esplanade to be useful is better without the proposed new stadium since the proposed stadium will expand waterfront parking lots right up to the edge of the esplanade – essentially making it a path through a

SUMMARY OF PARKLAND CONCERNS

parking lot. The community would be better off with the already planned esplanade without the proposed project.

TIMING OF PARK REPLACEMENT

Draft EIS states:

The full development of the proposed parkland would be completed by 2010.

Although the facilities would be replaced by new, permanent facilities, during construction almost all of the facilities would be unavailable for periods ranging from 3 months to 4 years, although only a limited number of facilities would actually be unavailable for the full year.

As shown in Table 4-2, the majority of the active recreation facilities would, however, be replaced within 1 to 2 years of its displacement. The longest time of displacement caused by construction would be for the soccer field and the 400-meter track. These facilities would be displaced for 3½ years, although a temporary exercise track would be created for local residents during construction. Throughout the construction period, a temporary exercise track would be created for local residents. From the second quarter of 2006 until about the fourth quarter of 2007, the temporary exercise track would be located around the two baseball fields next to and northwest of the existing Yankee Stadium. When construction displaces these ballfields, the esplanade surrounding the new ballfields in the Harlem River waterfront park would serve as a temporary track and would be available until the permanent track is available. The temporary exercise track would be about 15 feet wide and have a cinder surface and signage indicating distances. The temporary exercise track would be suitable for walking, jogging and recreational running, but would not be suitable for competitive track meets.

Response:

Taking parkland away from the community for construction is a net loss of parkland for the period of time involved. It is unfair to the community to do this since these facilities are heavily used. The neighborhood is already “under-parked” for the population that lives there. Taking away parkland for up to 4 years is unacceptable. The proposed mitigation, such as two separate locations for a “temporary exercise track” is ridiculous. It has been made clear by the community that a continuous usage of parks facilities is needed.

IMPACTS OF PARK REPLACEMENT

Draft EIS states:

As a result of the proposed project there would be no change in the types of uses located in the project area; however the locations of the various uses would be reconfigured and there would be a net increase in both parkland and parking facilities in the area.

The proposed project would also have a positive effect on the character of the area. The proposed project would provide a net increase in the area’s open space, and replace older, and in

SUMMARY OF PARKLAND CONCERNS

some cases worn, recreational facilities, with new, modern facilities. It would also create new access to the waterfront beyond what would have been provided in the future without the proposed project.

Pedestrian access between Jerome Avenue and River Avenue would no longer be available on East 162nd Street. Informal pedestrian access between the two avenues across Macomb's Dam Park would also be eliminated.

Response:

The proposed park changes would not "have a positive effect on the character of the area" in that it would be taking away a continuous swath of ground-level parkland and replacing it with disjointed, unconnected parkland located at various elevations above ground on the roofs of parking structures. This would likely cause a decline in the character of the area, despite the fact that a few extra acres of "parkland" would be added. Simply the fact that "informal pedestrian access" between two streets would be eliminated due to the new large stadium structure indicates a flaw in the proposed park plan since this type of access cannot be created.

The new waterfront access would have been built anyway without the proposed project – and would not simply be an "esplanade" surrounding an expanded parking lot.

TREE REMOVAL

Draft EIS states:

However, it is expected that the removal of mature trees, which are approximately 40 feet tall, within of Macomb's Dam Park and John Mullaly Park could result in unavoidable adverse impacts.

the loss of 373 trees (includes street trees and trees lost from the recreational facilities that would be displaced),

Although the proposed project would seek to retain mature trees wherever possible, it is expected that the removal of mature trees, which are approximately 40 feet tall, within Macomb's Dam Park and John Mullaly Park could result in unavoidable adverse impacts. Some of these trees would have to be removed due to the scope of the construction. Although the replacement trees would not achieve comparable size for several decades, the number of replacement trees would be extremely large and equivalent in total mass to the trees that would be lost. The addition of a significantly expanded canopy of trees to the project area and surrounding neighborhoods, in addition to the mature trees that would be retained, would mean that the change would not be significantly adverse.

It would also require the removal of large mature trees that are at the perimeter of the parks as well as a natural feature in the project area—the rock outcropping located at the northeast corner of the Macomb's Dam Bridge Approach and East 161st Street.

SUMMARY OF PARKLAND CONCERNS

The proposed project would retain approximately 170 trees in the project area but would require the removal of approximately 370 trees.

To minimize potential ecological impacts resulting from removal of large trees, thousands of smaller trees would be planted in the project area, study area and beyond. Nonetheless, the removal of mature trees would constitute an unavoidable adverse impact on visual resources until replacement trees grow to a mature size—a process that could take several decades.

The removed trees, which total a basal area of approximately 584 square feet, would be replaced with trees of a size totaling an equal basal area, or from between 8,356 trees of a 3 ½-inch caliper to 29,248 trees of a 2-inch caliper within the replacement recreational facilities and along streets. These replacement trees would create natural screening and areas of shade for relaxation and passive enjoyment for park visitors and habitat for wildlife. Should there be insufficient space to plant the calculated number of trees within the replacement recreational areas, the remaining replacement trees would be planted as street trees within the vicinity of the project area or as nearly as possible.

Response:

The DEIS makes it clear that the neighborhood will lose a lot of mature trees (373) and that the project has no real way of replacing them. It is a serious thing to cut down an older mature tree that has been growing for decades. It is a connection to the past, which lives on today. It is also a substantial amenity, providing shade and beauty to the urban environment in which we live. Streetscapes and parks are bleak without mature trees.

Replacing a mature tree with a 2 or 3” caliper tree is like turning the clock back 50 years. A lot of us will be either old or dead by the time we get to enjoy these new trees. To say that the “replacement trees would create natural screening and areas of shade for relaxation and passive enjoyment for park visitors and habitat for wildlife” is a huge exaggeration and a distortion of the truth. These replacement trees will not be able to realistically do this for a long time. Small, young trees do not have sufficient canopies to provide a good amount of shade or habitat for wildlife.

Furthermore 2 and 3” caliper trees do not always survive after they are planted. Therefore even if the exact number of trees were planted to mitigate the basal area of 584 square feet, within a couple of years, some of those trees will have died and we will be left with 3” caliper stumps as opposed to mature trees.

NYPD USE OF PARKS

Draft EIS states:

Building Security

The stadium would provide space for staging New York City Police, and a building command center.

As under current conditions, under certain operational and security conditions, some of the existing or replacement recreational facilities located near the proposed stadium could be used

SUMMARY OF PARKLAND CONCERNS

by the NYPD to meet operational needs during the baseball season and could be closed to public use.

Response:

A current issue for the community is the use of the parks by the NYPD for staging areas during ballgames. During these times, the NYPD takes over the park and residents are unable to use them.

Despite space in the new stadium for a new police staging area and command center, the DEIS admits that there is no guarantee that the NYPD will stop using the parks for staging. Under the future condition with the project, the community should expect the NYPD takeover of parks to continue. The community has already expressed that this is not an optimal solution.

PARKS FACILITIES

Draft EIS states:

However, NYCDPR may choose to vary the new facilities to provide replacements that are not exactly the same as those displaced, but are equal or greater in use and value. For example, NYCDPR in consultation with the local community may replace some of the existing handball courts with alternative recreational facilities that meet current community needs.

NYCDPR would replace 18 of the existing handball courts with alternative recreational facilities that meet current community needs, because many of the existing handball courts remain unused during peak summer hours. In this case, basketball courts may be more useful to current recreational needs.

The sections of the park that would not be affected by the proposed project contain play equipment, a marine animal-themed spray shower, ballfields, lawn, benches, an outdoor pool, basketball courts, swings, a skate park (for skateboards, rollerblades, and rollerskates), and the Mullaly Recreation Center.

Response:

NYCDPR should strive to provide the community with the best facilities possible. If this means changing the types of mitigation structures proposed, then that should be done – **BUT ONLY WITH COMMUNITY INVOLVEMENT**. Decisions on new park amenities should be made from the “bottom-up” through the Community Board, not from the “top-down” from the Mayor’s office or the Parks Commissioner.

HERITAGE FIELD

Draft EIS states:

The site of the existing Yankee Stadium would be a major feature of the recreation plan, providing Heritage Field on the site of the existing Yankee Stadium playing field

SUMMARY OF PARKLAND CONCERNS

The proposed project would retain the playing field, dugouts, and locker rooms under the field seats of the existing stadium and adapt it to a public baseball field called “Heritage Field.” (no more than 3,000 seats) Also on the site of the existing Yankee Stadium would be areas of landscaped, passive recreational open space. In total, this area would comprise 8.9 acres of new parkland.

East of Ruppert Place, the majority of the existing Yankee Stadium structure would be demolished. The existing Yankee Stadium baseball field would be retained as a publicly accessible baseball field, with the dugouts and some portions of the west grandstands also to be retained.

Response:

According to the DEIS, it is not clear how Heritage Field will be operated. Since part of the old stadium would remain (and hence a wall), would the field be locked during certain times? How much access would the public get? Beyond the perceived historical value (although the DEIS notes that it is not a historical structure) what would be the benefit of keeping a partially demolished stadium that may or may not be locked as opposed to simply creating an open park facility?

The proposed Heritage Field also might have relatively high maintenance costs compared to other parks facilities. Keeping a turf baseball field in tact requires a lot of time and money. How would this be maintained? How would dugouts and locker rooms be cleaned and maintained and kept secure? Who would have access to them? If nobody gets access to them, how would this be an even exchange of parkland since people can use all aspects of the parks now? The existing field is below the grade level of the surrounding streets. How will flooding be prevented?

Landscaped areas and buffers surrounding the old stadium will not be able to be used for anything practical. These should not be considered as areas for “passive recreation”.

RUPPERT PLAZA

Draft EIS states:

Ruppert Plaza between East 161st Street and East 157th Street would be converted to passive parkland use as part of the proposed project’s parkland replacement.

Between Heritage Field and the soccer field and athletic track would be a passive park with an alley of trees on re-aligned Ruppert Place. Renamed “Ruppert Plaza,” it would comprise 1.13 acres of new parkland. Ruppert Plaza would function as the main thoroughfare from the existing parking facilities, as well as proposed Parking Garage A, to the proposed stadium.

Ruppert Plaza would be an important recreation element that would be integrated with Heritage Field, and would also function as the main thoroughfare from the existing parking facilities, as well as proposed Parking Garage A, to the proposed stadium.

The design of Ruppert Plaza would include trees, benches, and pedestrian walkways.

SUMMARY OF PARKLAND CONCERNS

Response:

While the DEIS tries to describe Ruppert Plaza as an "an important recreation element", there is really no opportunity to use it as such, as it is proposed. Ruppert Plaza will mainly be used as a pedestrian walkway connecting parking garages with the stadium – flooded during game times and empty at all other times.

Ruppert Plaza will be situated between the wall of the old stadium, and the wall of Parking Garage A, which will have a track and a soccer field on top of it. People will have to use Ruppert Plaza to access the stairs/elevators that will take them to the track or the soccer field. But beyond the need to access those facilities, it is hard to believe that Ruppert Plaza will be used for any other form of recreation. It will be a paved mall, between two buildings, with a few benches and trees. Not an equivalent amenity compared to the parks that will be lost.

TRACK AND SOCCER FIELD

Draft EIS states:

These facilities would be built atop a new subterranean garage (Parking Garage A) but would be accessible at street level along Ruppert Place. In total, they would comprise 7.33 acres.

These would be developed on the roof of Parking Garage A, a two-story garage, which would be built primarily beneath the portion of the site west of Ruppert Plaza and set back approximately 12 feet from the Macomb's Dam Bridge Approach (see Figures 7-27 and 7-28). The roof of the garage would be at the level of the Macomb's Dam Bridge Approach.

Response:

The description of this facility is misleading. The garage will have portions that are underground – however, the top of the garage will be the same level as the Macomb's Dam Bridge Approach, which is higher in elevation than the other streets surrounding the garage. Therefore, that means that the rest of the garage will be partially above ground – particularly where the community will want to access it (nobody lives on the bridge approach – it is the approach of a bridge). The applicant should be more forthcoming about this. The community is still getting a grade-separated facility – on top of a parking garage, above the street.

TENNIS COURTS

Draft EIS states:

New public tennis facilities would cover the entire garage roof. However, the tennis facilities would appear to be only one level above the street along Macomb's Dam Bridge Approach. Pedestrian access for Garage C would be provided to the new roof-top recreational facilities, adjacent to the Macomb's Dam Bridge Approach intersection with East 161st Street

SUMMARY OF PARKLAND CONCERNS

It is expected that the roof level of the garage containing the tennis courts would project above the Macomb's Dam Bridge Approach by approximately 11 feet.

Response:

The fact that the tennis courts would be 11 feet above the Macomb's Dam Bridge Approach means that they will be much higher along Jerome Avenue and 161st Streets – the likely points of access. Instead of seeing tennis courts, everyone will just see the blank façade of a parking structure – four stories high. Access to the tennis courts will need to be via stairs or an elevator.

POCKET PARKS ALONG 157TH STREET

Draft EIS states:

Passive park/civic space is proposed east of River Avenue on either side of East 157th Street and would contain benches and unique paving landscapes. The northern park parcel would contain sculptured play elements. Together these parks would act as a gateway to Heritage Field. These facilities would constitute 0.68 acres of new parkland.

East 157th Street, would not be mapped as parkland. This area would contain passive open space until future plans for the parcel are defined. This acreage (0.75 acres) is not included in the 8.9 acres of replacement parkland and recreational facilities on the existing stadium site.

Response:

These would likely be vest-pocket parks or tot-lots with cramped facilities intended to serve the large numbers of people who used to have easy access to their parks. Notice how no grass is proposed – probably due to the limited amount of space available. A “unique paving landscape” is not a suitable substitution for grass.

It is highly doubtful that these tiny parks would act as a “gateway” for Heritage Field. Just because it is near Heritage Field does not make it a gateway. People traveling up River Avenue first have to deal with the towering and massive Parking Garage D before they reach these little parks – which would be visually obscured by the #4 subway. To call these parks a “gateway” is an inappropriate use of that planning term.

WATERFRONT ESPLANADE AND BALLPARKS

Draft EIS states:

existing Yankee Stadium Lots 13A and 13B located along the Harlem River would be repaired, restriped, and extended south to replace the spaces lost to create the esplanade

Existing Yankee Stadium Parking Lots 13A and 13B are located west of Exterior Street between the Bronx Terminal Market and the Macombs Dam Bridge. The proposed project would repave and restripe these existing lots and create new surface parking, as a southern extension to existing Yankee Stadium Lot 13A.

SUMMARY OF PARKLAND CONCERNS

New passive recreational open space and a pedestrian esplanade would surround these waterfront ballfields. A comfort station with restrooms would be constructed to the south of the ballfield.

a new 0.71-acre esplanade that would extend from the northern end of the waterfront park, wrap around the waterfront to the existing ferry landing, and extend east to the pedestrian connection at Exterior Street beneath the Major Deegan Expressway. Although it would not be mapped as parkland,

The proposed recreational facilities on Exterior Street and proposed esplanade would create new open space and ballfields along the Harlem River and would represent an important new community amenity that would serve the surrounding neighborhood and provide new public waterfront access.

The 5.11 acres of proposed parkland along the waterfront would be an added benefit to existing workers and residents, but would not be immediately adjacent to the residential areas and therefore would not have a significant effect on residential property values.

- A 0.71-acre esplanade along the Harlem River waterfront (not currently parkland). It would attract the public and enliven a waterfront area that is currently composed of degraded piers.

The proposed project would also include a new esplanade that would extend north from the proposed ballfields. The esplanade would extend from the northern end of the proposed park, following the edges of the piers that contain the existing Yankee Stadium parking fields, to the existing ferry landing. At that point, it would veer east to Exterior Street to the existing pedestrian connection beneath the Major Deegan Expressway (see Figures 7-27 and 7-35). It is expected that this new esplanade would be 20 feet wide. It would be designed with such amenities as decorative paving, landscaping, and lighting.

Besides providing welcome greenery, it is expected that the new waterfront areas would encourage pedestrian activity that would enliven the streets in this area.

Response:

This waterfront esplanade would not connect to anything except the ball fields, and would be in essence a “path to nowhere”. To access it, you would have to go through the pedestrian bridge over the Metro-North tracks, walk under an elevated expressway and through a parking area surrounded with razor-wire fences. This is not an inviting atmosphere that will serve to “enliven the streets in this area”. The DEIS admits this by saying the esplanade “would not have a significant effect on residential property values”. This is because the esplanade is in the middle of nowhere and will not provide substantial benefit to anyone.

This is not to say a waterfront esplanade should not be put in this location. However, the City was going to do this anyway as part of an initiative to line the entire Harlem river with a pathway. So we don't need this Yankee Stadium project as a way to get the esplanade. If anything, the Yankee Stadium project will make the esplanade worse in that it will add increased parking immediately next to the esplanade. What good is a waterfront walkway if it just goes through a parking lot?

SUMMARY OF PARKLAND CONCERNS

The ballfields will also be isolated and out of the way. In order to play baseball or softball there, you're going to have to carry your equipment over the pedestrian bridge, under the expressway and through a parking area surrounded with razor-wire fences. This is not equivalent in terms of access to the current ballfields, which you can see and access from the surrounding streets. These ballfields are in the shadow of the existing stadium, an iconic vision for youngsters to be in the presence of as they practice baseball. (What kid does not want to grow up to be a professional baseball player?) Instead, the new ballfields will be under the roar of an expressway.

“OPEN SPACE” SURROUNDING PARKING GARAGE B

Draft EIS states:

In addition to the active facilities cited above, public passive open space would surround Parking Garage B along East 164th Street (0.3 acres). This area would contain such amenities as grass and trees.

Response:

This open space will not be useful to the community but will merely act as landscaping around a parking garage. To call it “passive open space” insinuates that people will actually spend time here, which is unlikely. Landscaped areas surrounding parking garages are not generally known for passive park activity.

ULURP APPROVAL

Draft EIS states:

The disposition and acquisitions, parkland mapping, approval of a concession, parking garage special permit actions, and realignment of boundaries of East 161st Street, Macomb's Dam Bridge Approach, and Jerome Avenue in the vicinity of the proposed stadium site are subject to the City's Uniform Land Use Review Procedure (ULURP), and all of the actions require environmental review. NYCDPR is the lead agency for the environmental review.

Response:

The above ULURP actions should not be approved. Doing so will have a devastating impact on the community by taking valuable parkland away and replacing it with inferior facilities which must be constructed at great taxpayer expense.

SUMMARY OF TRAFFIC CONCERNS

VEHICULAR TRAFFIC IMPACTS

Draft EIS states:

There would be a greater concentration of traffic on East 157th Street, Jerome Avenue, the Maccomb's Dam Bridge Approach, and a portion of East 161st Street near Jerome Avenue, where two of the four proposed parking garages would be located, and on segments of the expressway that lead to East 157th and East 161st Streets.

The proposed project would result in significant adverse traffic impacts at local intersections within the traffic study area and along sections of the Major Deegan Expressway near the proposed stadium site.

Mitigation measures would consist of signal phasing and timing changes, implementation of physical measures to better delineate travel lanes, parking regulation changes ("No Parking, Stadium Event" restrictions), lane signage changes, and the use of variable-message signs (VMS) to inform motorists about traffic conditions.

overall game day traffic management plan.

Implementation of the standard traffic mitigation measures described above would result in all significant adverse traffic impacts being mitigated with the following exceptions: the Maccomb's Dam Bridge Approach/East 161st Street intersection would be unmitigated in both the weeknight and weekend pre-game arrival peak hours and in both post-game analysis hours; the River Avenue/East 161st Street intersection would be partially mitigated in both peak hours; the Jerome Avenue/East 161st Street intersection would be partially mitigated in the weeknight pre and post-game peak hours; the intersection of Maccomb's Dam Bridge Approach and the exit ramp from the southbound Major Deegan Expressway would be partially mitigated during both peak hours; and the intersection of Jerome Avenue/Ogden Avenue would be partially mitigated in the weeknight post-game peak hour.

Decreased traffic circulation on local streets in search of available parking spaces and less parking on the local streets themselves would provide a benefit to the local community.

As a result of the proposed project, there would be a significant shift of vehicular traffic patterns to and from the proposed stadium since some motorists would now exit and enter the Major Deegan Expressway farther north than they do today.

East 162nd Street would be closed and demapped between River Avenue and Jerome Avenue, and would essentially serve as an entry/exit for one of the new parking garages (Parking Garage B)

East 157th Street between River Avenue and Ruppert Place would be re-opened to vehicular traffic

The creation of 5,254 parking spaces in the four proposed garages would also create a shift in motorists' travel patterns to and from the stadium since some would now exit the Major Deegan Expressway when arriving, and enter the expressway when leaving, further north than they do

SUMMARY OF TRAFFIC CONCERNS

today. As is described later in this chapter, there would be a greater concentration of traffic on East 157th Street, Jerome Avenue, the Maccomb's Dam Bridge Approach, and a portion of East 161st Street near Jerome Avenue,

There would be less traffic on Exterior Street and on the northbound expressway exit ramp to East 149th Street, since much of the traffic that now parks south of the existing stadium is expected to shift northward to park in the proposed garages located closer to the proposed stadium.

The proposed project would result in significant adverse traffic impacts at local intersections within the traffic study area and along sections of the Major Deegan Expressway near the proposed stadium site.

Response:

Yankee Stadium is notorious for its nerve-wracking, blood-pressure raising, hair-pulling, bumper-to-bumper traffic on game days. Everyone knows about it, whether you live near the stadium or not. Radio traffic reports always talk about it and people avoid the Major Deegan at game times. Locals change their driving patterns according to game schedules to avoid the mess that stadium traffic creates.

Because of what a stadium is – a theater that holds 54,000 people, it is unrealistic to expect that traffic can just go away completely. Traffic is bad now, and traffic will continue to be bad if the new stadium is built. The DEIS makes no argument against this – and openly admits that traffic will continue to be miserable before and after games. However, while the misery will be kept – the new stadium location will shift the focus of that misery from one part of the neighborhood to another. In this case, the traffic will be shifted from an industrial area (River Avenue and 149th Street) to directly in front of the Highbridge neighborhood. Due to the neighborhood's somewhat isolated location atop a hill, it will be very difficult for these unlucky residents to get into and out of their homes 80 days a year or more since the roads into and out of the neighborhood will be clogged with traffic before and after the games.

While the DEIS makes no effort to hide the traffic problems, the project does not offer much else in the way of alternative access. Instead of just saying "the traffic will be bad so deal with it" the project should instead offer more public transit alternatives, such as a new Metro-North Station at the project site along with greater train service to the Melrose station. Getting people off the roads will benefit everyone in a number of ways:

- Local residents will have less traffic to deal with
- Fans coming to the games can opt to take transit and not have to deal with the maddening traffic – this might allow them to enjoy the game experience more
- The Yankees can benefit from increased beer sales since they won't have to worry about people driving home drunk

INCREASED VOLUME OF TRAFFIC/INDUCED DEMAND DUE TO MORE PARKING

Draft EIS states:

SUMMARY OF TRAFFIC CONCERNS

a net addition of approximately 3,022 spaces above existing parking supplies— would make it easier for fans driving to games to park closer to the stadium, resulting in less circulation on local streets in search of the currently often hard-to-find parking spaces.

(1) the proposed project would provide Yankees fans with thousands of new parking spaces close to the proposed stadium, thus relieving the area of excessive traffic circulation pre-game as motorists would no longer have to circulate on local streets in search of hard-to-find parking spaces, especially on sellout game days; (2) the proposed project would also eliminate some illegal parking on local streets and on the service road of the northbound Major Deegan Expressway since the parked cars could now be accommodated within off-street parking lots and garages; (3) the proposed project would result in a shift of vehicular traffic from some currently used traffic routes to others, primarily to streets such as Jerome Avenue, the Macomb's Dam Bridge Approach, River Avenue, and others;

As with vehicular traffic, the proposed project would not result in a net increase in transit and pedestrian trips over existing conditions. Rather, these trips would be redistributed within the transportation network, largely due to the future location of the proposed stadium, the addition of nearby parking, and the provision of a dedicated pedestrian walkway along Ruppert Plaza.

A sellout game at the existing stadium, with its 57,000 attendance capacity, can attract approximately 3,000 more fans than the proposed stadium. Therefore, the existing stadium attracts 320 to 480 more vehicle trips in the peak arrival and departure hours than the proposed stadium would

Response:

The fact that thousands of new parking spaces will be added to the stadium complex will mean that it will be easier for fans driving to the game to find a space. As a result, it should be expected that more fans will decide to start driving – or driving cars with fewer passengers – to the game since the deterrent of hard-to-find parking will be removed. This concept is called *induced demand*, and it is a common phenomenon that traffic engineers are well aware of.

The DEIS has chosen to ignore this concept, despite the fact that several people and organizations brought it up at the hearing for the Draft Scope of Work. However, Page A-15 of the Final Scope of Work states, “The DEIS will address the issues of modal split and induced demand.” The fact that an induced demand discussion was not included in the DEIS is a breach of protocol and a betrayal of the trust put into the public hearing process for the Draft Scope of Work. Because the DEIS did not include an analysis on induced demand, it is not a complete document, and should not have been accepted as complete by NYCDPR.

Instead of providing a meaningful analysis on the concept of induced demand, the DEIS instead makes the claim that 320 to 480 less vehicle trips will be made since the seating capacity of the new stadium would be less than the current stadium. This figure is strictly based off of trip generation multipliers and does not take into account the reverse effect that induced demand will cause.

By ignoring the concept of induced demand - a real impact of providing increased parking to any site - and stating that traffic will actually lessen with the new proposal, the DEIS has created a sham analysis of

SUMMARY OF TRAFFIC CONCERNS

traffic that should be thrown out and re-written before any decisions get made. Additional studies such as air quality impacts and public health impacts may have to be re-done as well as a result.

TRIP ORIGINS FOR PEOPLE DRIVING TO GAMES

Draft EIS states:

The largest share of auto trips is from Northern New Jersey, ranging from 21.5 percent for weekend games to 23.6 percent after weeknight games. The next two highest percentages are from New England and Long Island, which account for 15.0 to 17.8 percent of trips to/from New England and 13.5 and 14.7 percent of trips to/from Long Island. Other non-New York City trip origins include Upstate New York counties east and west of the Hudson River such as Westchester, Rockland, Putnam, Dutchess and Orange Counties, which combine for 17.9 to 21.5 percent of peak hour trips. Southern and Central New Jersey trips account for another 9.0 to 10.5 percent of trips.

Weekday auto trips from the five boroughs of New York City range from 13.8 percent after weeknight games to 20.3 percent before weeknight games.

Response:

The above trip origin data shed light on what could be done to get more people to the stadium by public transit. While northern NJ is somewhat difficult to get to from the stadium on transit, transit improvements such as the ARC tunnel and the new Tappan Zee Bridge will help alleviate this and should be explored, particularly for day games. Ferry service should also be looked into from various Hudson River ferry landings as another way to get people to the site, particularly on day games when the weather is nice. Package deals should be put together to accommodate these people.

People coming from Westchester, Putnam, Dutchess and Connecticut should all have the option to take Metro-North – either to a new Yankee Stadium station on the Hudson Line, or to the Melrose station on the Harlem and New Haven Lines. These train lines are tremendous resources which have so far been ignored by the project. They are a suitable way to get people to and from the games without the need to drive. People are already using it, and more can be expected if improvements are made. If the Tappan Zee Bridge is reconstructed with a connection to the Hudson Line, people from Rockland and Orange Counties will also be able to take the train directly to a new Yankee Stadium station. According to the project schedule, the new Tappan Zee Bridge could be open only a couple of years after the proposed new stadium would open.

People traveling from the 5 boroughs should not need to drive to get to a game. Transit service should be improved to allow these people to use the transit system that they pay for through their taxes and fares.

NEW LOADING AREAS

Draft EIS states:

SUMMARY OF TRAFFIC CONCERNS

service vehicles would park off-street in a secured service drive between the north side of the proposed stadium and proposed parking Garage B, and River and Jerome Avenues.

the proposed stadium would have a secured service drive between the north side of the proposed stadium and Parking Garage B, which would provide several loading docks for food service deliveries, team and other deliveries, and trash storage and pickup. Access to this secured driveway would be from River and Jerome Avenues. Team parking for private cars and buses would be located within the building and would have a designated access off River Avenue. In addition, the proposed stadium would provide space in the loading area for 10 large mobile media trucks with hookups

Truck and bus loading and operation of service vehicles have been removed from public streets

Response:

The service drive is a good idea in that it will take trucks that currently idle on the street, off the street and out of everyone's way.

The bus loading area should also include space for NYC Transit buses to drop off passengers on game days in front of the stadium. The Yankees should work with NYC Transit to encourage the use of express buses to games from the further reaches of the city (Staten Island, for example) to further cut down on traffic impacts.

PEDESTRIAN IMPACTS

Draft EIS states:

An at-grade, controlled crossing of East 161st Street at Ruppert Plaza would be created.

The River Avenue and Ruppert Plaza intersections at East 161st Street would experience significant adverse impacts with the proposed project, but could be mitigated with the augmentation of pedestrian crosswalks.

Pedestrian access between Jerome Avenue and River Avenue would no longer be available on East 162nd Street. Informal pedestrian access between the two avenues across Macomb's Dam Park would also be eliminated.

With the exception of the fans parking at the new Garage B and the existing parking facilities north of East 161st Street, all patrons from the new Parking Garages A and C and those parking south and west of the existing stadium, would be required to cross East 161st Street. Three crosswalks along East 161st Street at River Avenue, the new design element at Ruppert Plaza, and the widened crosswalks along Macomb's Dam Bridge Approach would operate at congested levels.

Pedestrian improvements include wider crosswalks, sidewalks, and additional green time at signals for pedestrians to access the new stadium, a new signalized midblock crossing of East 161st Street leading to the new stadium, and others.

SUMMARY OF TRAFFIC CONCERNS

To extend the pedestrian experience through Ruppert Plaza across East 161st Street onto the proposed stadium plaza, a new crossing would be provided. The maximum peak hour volume projected at this location is approximately 13,500 pedestrians, with a peak 15-minute surge of over 5,000 pedestrians.

Response:

As stated in the DEIS, the channellization of pedestrians through Ruppert Plaza will create a near tidal-wave of pedestrians who will have to cross the busy 161st Street at a controlled mid-block intersection. It is not a good idea to intermittently stop this flowing river of people at a controlled intersection to allow cars to go through. It will cause crowding and potential vehicle-pedestrian conflicts. It will only get worse after the game when drunk fans have to stagger back to their cars (hopefully under the supervision of friends who are designated drivers).

The new stadium structure will also prohibit pedestrian circulation through what used to be 162nd Street or informally through what used to be Maccomb's Dam park. This will create a circuitous walking route for many local residents, and will place an unfair burden on those with disabilities who now have to go out of their way to get to the store or to the subway.

BICYCLE ACCESS

Draft EIS states:

Although the proposed project is not anticipated to generate a demand for bicycle travel, secure bicycle parking would be provided at one of the new proposed garages

Response:

The project could create a demand for bicycle travel if the Yankees wanted it to. Bicycling in New York City has become enormously popular, particularly as the city has added new bicycle paths to its park system and bicycle lanes to its street system. The City has an aggressive bicycle promotion policy compared to other municipalities. We have organized rides sponsored by the City government. We have advertising encouraging us to ride bikes to reduce pollution. And we have a growing population of cyclists as a result.

The City and the Yankees should encourage this trend by encouraging people to ride their bicycles to Yankees games. Special bike-to-game promotions should be sponsored by the Yankees and the City should add more bicycle facilities in the stadium vicinity. Having secure bicycle parking at the stadium is a good start. However, the parking area should be a supervised and secure area, and not just a couple of racks bolted into the sidewalk.

CONSTRUCTION IMPACTS

Draft EIS states:

SUMMARY OF TRAFFIC CONCERNS

A scenario in which construction workers would be provided with parking at one of the Yankee Stadium garages was evaluated, as was a scenario in which construction workers would instead park in on-street parking spaces. The analysis concludes that there would be significant adverse traffic impacts under both scenarios, for which only partial mitigation has been identified at this time.

Response:

Again, another reason to support public transit. If parking and traffic continue to be issues that are only aggravated by construction workers, why is the solution always just to add more parking or ignore the potential of public transportation to serve both construction workers and fans?

SUMMARY OF PUBLIC TRANSIT CONCERNS

ABILITY TO ATTRACT ADDITIONAL TRANSIT RIDERS WHO NOW DRIVE

Draft EIS states:

representing a net addition of approximately 3,022 spaces above existing parking supplies—would make it easier for fans driving to games to park closer to the stadium, resulting in less circulation on local streets in search of the currently often hard-to-find parking spaces.

The proposed project is expected to result in similar overall transit use and pedestrian levels as currently exist in the surrounding area of the project site. to the change in terms of access patterns and the redistribution of pedestrian flow.

Several transportation surveys have been conducted for Yankees games previously. Those surveys show that the escalation in attendance realized in recent years has resulted in some shift of the fan base and has affected the decision making of fans on how to travel to and from Yankee Stadium. To validate and supplement the findings established previously, a travel survey was conducted in September 2004 to collect data on existing stadium-related travel patterns. The data were then compared to results from other surveys, including a summer 2001 survey undertaken by Vollmer Associates, LLP, to solidify the necessary assumptions on travel characteristics for projecting future trips to and from the new stadium. Information from a separate auto-only survey conducted in the summer of 2004 by Urbitran Associates, Inc. for the New York State Department of Transportation (NYSDOT) was also used for vehicle trip distribution purposes.

For both the weekday and weekend game conditions, the primary mode of travel is auto, making up 63 and 68 percent of the total stadium trips, respectively.

This is a conservative (i.e., high) estimate of auto use since the most recent surveys on game days show decreasing auto use and more transit use resulting from an increased fan base from Manhattan (which is more transit oriented with the proximity of several subway lines)

Travel by subway comprises 32 percent of trips on a weekday and 24 percent on the weekend. The remaining travel modes, including taxis and black cars, charter service, city bus, ferry, and walk only combine to total 5 and 8 percent on a weekday and on a weekend day, respectively.

(1) the proposed project would provide Yankees fans with thousands of new parking spaces close to the proposed stadium, thus relieving the area of excessive traffic circulation pre-game as motorists would no longer have to circulate on local streets in search of hard-to-find parking spaces, especially on sellout game days; (2) the proposed project would also eliminate some illegal parking on local streets and on the service road of the northbound Major Deegan Expressway since the parked cars could now be accommodated within off-street parking lots and garages; (3) the proposed project would result in a shift of vehicular traffic from some currently used traffic routes to others, primarily to streets such as Jerome Avenue, the Maccomb's Dam Bridge Approach, River Avenue, and others;

Response:

SUMMARY OF PUBLIC TRANSIT CONCERNS

The DEIS states that travel surveys have been conducted and that transit use is becoming more preferred by game-attending fans. If that is the case, why does the proposed project not include greater transit amenities while at the same time bemoaning that traffic problems will continue? Why does the proposed project include more parking, which will encourage more people to drive, when people have already stated in surveys that transit is becoming a more popular option? It is almost as if the Yankees and the City actually want more people to drive to games, perhaps to gain additional revenues from parking?

If people had more transit options to get to the stadium, there would no doubt be a greater demand for transit services. The fact that more people going to games from Manhattan has boosted transit ridership to the station is a concept that can be applied to other parts of the region by enhancing service for those people. Metro-North is an excellent resource to do this because the site is well served by all three of the east-of-Hudson routes. West-of-Hudson routes may also be added into the mix in the future with the new Tappan Zee Bridge project.

The fact that many people drive to the stadium now may not be a function of their desire to be in a car. It may have something to do with the fact that no good transit options are available to them. Improving Metro-North access to the stadium would remedy this, and would likely boost the modal share of transit rides to the site. Improved transit service to other parts of the region (Long Island, New Jersey) should also be looked at. We need to be innovative in order to make our region's transportation functional. Just throwing more parking into the equation is not a solution to anything and will only add to the problem.

METRO-NORTH ISSUES

Draft EIS states:

The proposed project would also make improvements along River Avenue and in the area of the existing pedestrian bridge over the Metro-North Railroad tracks. Access to the existing pedestrian bridge would be improved and made ADA compliant. New urban design elements, such as unique paving, signage, and pedestrian lighting would be implemented at the western end of the pedestrian bridge.

In The Bronx, the Hudson line has its southernmost stop in Morris Heights, approximately 2 miles north of Yankee Stadium. Connection via public transit from this location requires multiple transfers to local buses and/or the Jerome Avenue subway.

The New Haven and Harlem lines have their nearest stop at the Melrose station, which is about 0.65 mile to the east of the existing stadium.

Although 125th Street station is further away from the existing stadium than the aforementioned stops, its more convenient transfer to the Jerome Avenue line (No. 4 train) at the 125th Street subway station makes it the most popular stop for patrons traveling via the railroad.

Overall, travel via the railroad represents a small percentage of the overall trips destined for Yankees home games. It is anticipated that the proposed stadium would have little, if any, effect on future railroad travel. Hence, a quantified analysis of Metro-North Railroad operations is not

SUMMARY OF PUBLIC TRANSIT CONCERNS

warranted, and the proposed project would not result in any significant adverse impacts on railroad travel.

Response:

This is perhaps one of the most bizarre parts of the entire proposal. You have horrible traffic problems getting people to and from the stadium. You have Metro-North tracks running through the stadium site. You have travel surveys that indicate a desire to use transit. You have a new shopping mall going in next to the stadium and next to the tracks. And you have a federal Congressional appropriation for \$2.4 million to “upgrade Metro-North stations in the Bronx and construct a station at Yankee Stadium”. Everything seems to be lined up for what should be a “no-brainer” – constructing a new Metro-North station as part of the project. Yet, no new station is envisioned for the project, and Metro-North service has been dismissed by the DEIS. The stadium will “have little, if any, effect on future railroad travel”

This is completely insane. It is almost becoming one of those comical “only in New York” type situations where New York gets laughed at for its inability to provide basic, essential services for its people while money gets wasted on politically favored projects and bureaucratic red-tape.

We have a \$2.4 Million earmark under the new federal SAFETEA-LU legislation that was recently signed into law by President Bush. The earmark (Earmark No. 2289) would give substantial money towards the construction of a new Metro-North station at the stadium, but could also be used to upgrade service to the Melrose station – thus providing better access from all three east-of-Hudson metro north lines, reaching a catchment area as far north as Poughkeepsie and as far east as New Haven. It would open up the stadium to train travel in a way that cannot be accomplished now – with transfers at 125th Street or Morris Heights and infrequent service to the Melrose station.

A new Yankee Stadium station should have extra train service scheduled for both game start and end times, in addition to regular service for local community residents. The Melrose station should get increased service on both the Harlem and New Haven lines for game times as well. The Yankees should work with Metro-North on various package deal incentives to encourage train use. Such ideas should include, but not be limited to:

- Free or reduced fare rides when ticket stubs for events are shown on board trains
- Giveaways or promotions at the stadium for people who ride transit to games
- Free parking at rail stations for game attendees

Doing this will not only benefit the project by reducing traffic to and from the stadium, but it will also serve to raise the profile of public transit, and get people using it who might not ride it ordinarily. Public transit is good for society in that it reduces energy consumption and reliance on foreign oil and other resources that are finite in supply. It is a smart choice for New York and it will certainly become a more obvious choice as oil supplies around the world tighten, and competition for diminishing resources with developing countries becomes more intense.

SUBWAY IMPACTS

Draft EIS states:

SUMMARY OF PUBLIC TRANSIT CONCERNS

Therefore, absent major station modifications, the significant adverse impacts identified for the eight subway station stairways would remain unmitigated.

Response:

The DEIS states that nothing will be done to improve subway access to the stadium under the existing conditions. While the stadium currently enjoys good subway access, there is always room for improvement, especially when you can take unneeded cars off of the road. The project should be revised to include a more innovative approach to subway access.

BUS IMPACTS

Draft EIS states:

Truck and bus loading and operation of service vehicles have been removed from public streets

The Bx13 bus uses eastbound East 162nd Street to southbound River Avenue, westbound East 161st Street, and southbound Jerome Avenue to return northbound to Ogden Avenue. The Bx6 bus travels eastbound and westbound on Macombs Dam Bridge and East 161st Street.

The NYCT Bx13 (Ogden Avenue-W. 181st Street) bus uses eastbound East 162nd Street to complete its southbound Ogden Avenue route to southbound River Avenue, westbound East 161st Street, and southbound Jerome Avenue to return to northbound Ogden Avenue. The bus could divert one block to the north upon closure of East 162nd Street so that instead of turning right onto eastbound East 162nd Street from Jerome Avenue, it would turn right onto eastbound East 164th Street to southbound River Avenue, and continue along the original route back to northbound Ogden Avenue.

Response:

New bus routing will need to be worked out as a result of this project. But with the re-routing, additional improvements should be made to allow these buses to better serve the stadium and stadium going fans. The bus loading area should include a bus area for NYC Transit buses to unload stadium-going passengers. This would also permit NYC Transit to have the ability to run special express buses from the farther reaches of the city (such as Staten Island or Brooklyn) to give these people another to get to the games without needing to drive.

SUMMARY OF AIR QUALITY CONCERNS

AIR QUALITY ANALYSIS

Draft EIS states:

The results of the analysis indicate that in the future with the proposed project, there would be no potentially significant adverse air quality impacts from mobile sources.

maximum predicted 8-hour CO concentrations for the analyzed sites with the proposed traffic mitigation measures would be below the NAAQS and would not result in any significant adverse air quality impacts

The analysis concludes that the proposed project would not result in significant adverse air quality impacts. The proposed project would increase traffic volumes at a number of intersection locations but would not result in any exceedances of the City's *de minimis* criteria or the national ambient air quality standards for carbon monoxide (CO)

Response:

The way an air quality analysis is conducted and the assumptions that are used at the beginning of the analysis will greatly impact the results of the analysis. In this case, the air quality analysis was fed flawed information on the assumption that “the existing stadium attracts 320 to 480 more vehicle trips in the peak arrival and departure hours than the proposed stadium would”. Basically, the new stadium would have less cars driving to it (despite more parking spaces) so the air quality impacts would be less.

The air quality analysis should have instead taken the induced demand effect created by the additional parking spaces into account. This induced demand would probably increase traffic to the stadium and as a result, worsen air quality. As such, the air quality analysis should probably be re-done given the fact that an induced demand analysis was not conducted even though the Final Scope of Work said it would on page A-15.

ASTHMA

Draft EIS states:

The proposed project would not meet any of the thresholds warranting a public health assessment. However, to address comments made during the scoping of the proposed project, an analysis of asthma—its prevalence in New York City and its possible causes and triggers—was performed, and an assessment of the potential public health effects from the proposed project was presented.

The causes of asthma and its increase over the last two decades are not certain, and the triggers for its exacerbation are only partially understood.

Since the proposed project is not considered to have significant PM_{2.5} impacts, diesel emissions from project-related truck traffic are unlikely to significantly adversely affect public health and local asthma incidents.

SUMMARY OF AIR QUALITY CONCERNS

Nonetheless, NYCDPR and the Yankees are sensitive to the community's concerns with respect to the incidence of asthma among the local population. Accordingly, the project sponsors are working and will continue to work with the community to develop measures to address those concerns.

Response:

The South Bronx is well known as one of the epicenters of asthma affliction in this country. Because of this, it is imperative that we do not make important decisions to go ahead with projects if there is any chance that it will make the asthma condition worse. The DEIS indicates that this is not a concern for the Yankees or the City by making the dismissive remark: "The causes of asthma and its increase over the last two decades are not certain, and the triggers for its exacerbation are only partially understood."

While it may be true that asthma is not fully understood as a disease, what is understood is that pollution definitely plays a role. This understanding, however partial, does not make it okay to just create more automobile congestion (and pollution) in our community. If there is even a chance that auto-pollution causes or exacerbates asthma, then everything should be done to reduce that pollution. There are real, human lives at stake. If even one life is spared or made better by reducing car traffic (and pollution) to the games then the effort is worth it.

I challenge the Yankees and the City to do a public health analysis where they quantify the monetary value of human lives and do a cost-benefit analysis with proposed mitigation measures to improve air quality in the area beyond what has been proposed. Such a sick, Orwellian exercise will serve to make a point that what is dollars and cents to the Yankees is actually the lives of thousands of people in our community. It is clear from the project scope and the project intent (more parking and driving to the stadium) that the Yankees are not "sensitive to the community's concerns with respect to the incidence of asthma among the local population." To make such a statement to the community is an insult.

SUMMARY OF NEIGHBORHOOD IMPACTS

IMPACTS FROM PROPOSED STADIUM STRUCTURE

Draft EIS states:

The height of the proposed stadium, at its tallest point—the top of the canopy—would be on average approximately 138 feet above grade (since the grade changes around the site, all figures are approximate). (Field light towers would extend above this canopy.)

It is anticipated that the lighting at the proposed stadium would control glare and light spill in a more efficient manner than currently exists, with light spill during night games anticipated to be an indirect glow.

The effective relocation of the proposed stadium one block north of East 161st Street would introduce a land use that is large enough to potentially affect property values for residential buildings along Jerome Avenue between West 161st and 164th Streets.

With the proposed project, residents living in these buildings would be subject to noise, bright lights, and large crowds during game nights. Living across the street from the stadium could make it less likely that someone would want to rent an apartment, thereby decreasing the value of the properties.

Even if the proposed project would reduce the value of these three buildings, they represent only a small portion of the overall value and investment in the study area, and would not offset positive trends in the study area, nor impede efforts to attract investment to the area.

The construction of the proposed stadium would eliminate the continuous, open, generally landscaped, area that currently exists within Macomb's Dam Park and John Mullaly Park, between East 161st and East 164th Streets, and would create strong streetwalls anticipated to possess visual interest due to the arcaded façade design and fenestration along River and Jerome Avenues and East 161st Street.

Although it would have a somewhat larger footprint...the proposed stadium would rise to a height similar to the existing stadium, and as such would not result in a structure of a significantly larger mass or height than presently exists in the neighborhood.

Response:

The DEIS is forthcoming with the statement that the proposed stadium project is likely to negatively impact apartment buildings located on Jerome Avenue. This will mean decreased property values for these buildings and the potential to create a blighting effect. This is not fair to the residents and owners of these buildings. The DEIS is dismissive about this, however, by saying that it is only a small number of people, so it does not matter. This is insulting to these people and an example of arrogant and autocratic top-down planning that the public has generally come to despise over the years. "You can't make an omelet without breaking a few eggs" should not be the attitude used when dealing with ANY residential community.

SUMMARY OF NEIGHBORHOOD IMPACTS

Those unfortunate enough to live across from the new stadium will have to deal with traffic, noise, light-spill effects and an imposing, 13 story stadium wall in front of their windows. Compared to the current situation (open parkland) this is a dramatic change and will only serve to blight these buildings.

The buildings immediately in front of the proposed stadium also have historic significance to them which would be disregarded by this blight-inducing action.

IMPACTS FROM PROPOSED GARAGES

Draft EIS states:

Parking Garage D would be a five-level above-grade garage (including one level of roof parking) located south of the proposed stadium at East 151st Street between River and Gerard Avenues. The garage would accommodate approximately 949 spaces. Two-way access would be available at River and Gerard Avenues. Parking Garage D would extend over East 151st Street at the third, fourth, and roof levels.

The parking garage to be built north and south of East 151st Street, Parking Garage D, would span over that street, and would also alter streetscape.

A new, five-story structure along the south side of East 164th Street. The garage would be set back from Jerome and River Avenues behind a landscaped buffer of approximately 0.3 acres, and the curb row of existing trees on the south side of 164th Street would remain. These landscape features would soften the change in streetscape on Jerome Avenue.

It is anticipated that they would be of a similar design, e.g., open-air concrete garages, and they would contain other amenities in addition to parking, e.g., tennis courts on the roof of Parking Garage C and possible ground level retail in Parking Garage D. It is also expected that the areas surrounding Parking Garages B and C (Parking Garage A would be underground) would also be landscaped. As described above, Parking Garage B would introduce a new streetwall along the south side of East 164th Street.

The construction of Parking Garage B on the south side of East 164th Street would be expected to alter views on East 164th Street, from John Mullaly Park north of East 164th Street, and from Jerome Avenue, by replacing tennis and handball courts with a five-story parking structure.

the proposed project would retain as many of the curbside row of the mature trees on East 164th Street and on Jerome Avenue as possible, which would partially screen the new structure.

Response:

Parking garages are generally ugly-looking structures – particularly open-air concrete structures which the DEIS references. Whether you landscape them or not, nobody wants one in their neighborhood. Yet the community will get 4 new structures, all of which will be very large...and none of which will be open to the public to use unless they are going to a game. This is a worst-case scenario for residents, who will

SUMMARY OF NEIGHBORHOOD IMPACTS

have to put up with unsightly structures near their homes, but will not be allowed to use them. It is a perverse irony that borders on the discriminatory.

IMPACTS TO HISTORICAL RESOURCES

Draft EIS states:

Between 1890-1895 the Macombs Dam Bridge and its Manhattan and Bronx approaches (NYCL, S/NR-eligible) were built (discussed below in greater detail under “Known Architectural Resources” and “Existing Conditions”).

As currently planned, these garages would be set back approximately 12 feet to the east and west of the Macomb’s Dam Bridge Approach, essentially eliminating the visibility of this section of the landmarked structure within the project area. However, the most prominent features of the Macombs Dam Bridge roadway system—the Macombs Dam Bridge Pratt truss spanning the Harlem River and the camelback truss spanning the Metro-North Railroad right-of-way—would remain unaltered by proposed Parking Garages A and C.

The **Park Plaza Apartments** (NYCL, S/NR), designed by Horace Ginsberg and Marvin Fine (1929-31), are located at 1005 Jerome Avenue between East 162nd and 165th Streets, directly across Jerome Avenue from the proposed stadium site. The Park Plaza, clad in orange brick accented by multi-colored terra-cotta ornamentation, was one of the first and most prominent Art Deco apartment houses in The Bronx (see View 15 of Figure 6-10). Its design spearheaded the proliferation of Art Deco buildings that significantly altered the appearance of The Bronx during the 1930s. It is located approximately 100 feet from the project area.

The **Mullaly Recreation Center** (NYCL-eligible, S/NR-eligible) dates from the early 1930s and is located in the western section of John Mullaly Park between East 164th and East 165th Streets. The building was renovated in 2000 as part of a \$3.1 million overhaul of John Mullaly Park

The apartment building at **1001 Jerome Avenue** (S/NR-eligible), sited across Jerome Avenue from John Mullaly Park, was built in 1937. This Art Deco building is clad in gray brick, rises eleven stories, and is divided into three expressed bays alternating with two recessed bays (see Views 22 and 23 of Figure 6-14). The windows of each bay are arranged in columns accenting the building’s verticality. Decorative brickwork also draws the viewer’s eyes upward. It is located approximately 100 feet from the project area.

The proposed stadium site is located more than 90 feet (the anticipated area of potential impacts from construction) from the known architectural resources in the study area. However, the Park Plaza Apartments, located at 1005 Jerome Avenue, and the apartment building located at 1001 Jerome Avenue, adjacent to the Park Plaza Apartments, are directly across Jerome Avenue, a 100-foot-wide street, from the proposed stadium site.

SUMMARY OF NEIGHBORHOOD IMPACTS

Although Parking Garage B would be visible from the Mullaly Recreation Center, the parking garage is not expected to significantly affect this known historic resource since the proposed garage would not create significant shadows or otherwise alter the building's context or significant features.

In addition, the proposed stadium would be located across Jerome Avenue from two architectural resources, the Park Plaza Apartments at 1005 Jerome Avenue and the apartment building at 1001 Jerome Avenue. However, the proposed project is not expected to have any adverse contextual impacts on these resources. Though the proposed context of the project area between East 164th Street and East 161st Street would change from one containing parks and recreational facilities to one that contains a new stadium, garage, and new open spaces, the significance of these buildings lies primarily in their Art Deco designs.

Response:

Of all the landmarks concerned above, the DEIS seems more concerned with preserving the view of the Macomb's Dam Bridge and its approaches than it does of any other historical impacts. The fact is, 1001 and 1005 Jerome Avenue are superb historical resources. While their significance is contained primarily in their Art Deco designs, the context of those designs as located across from the park play a significant role in the overall contextual picture. By placing the stadium in this location, the park will be eliminated and a negative contextual impact on the resources will be created.

Add to that the fact that people actually live in this resource, and you have another issue.

Placing the large bulk of a 138 foot tall stadium 100 feet away from the front door of a historic one-of-a-kind Art Deco building will have a negative impact on this New York City Landmark. To say it will not ignore what the building is – a landmark.

IMPACTS FROM PROPOSED WATERFRONT ESPLANADE AND BALLFIELDS

Draft EIS states:

The 5.11 acres of proposed parkland along the waterfront would be an added benefit to existing workers and residents, but would not be immediately adjacent to the residential areas and therefore would not have a significant effect on residential property values.

Response:

The waterfront esplanade will not have an effect on residential property values because it would be a worthless facility – essentially an “esplanade to nowhere”. It would not be near anything besides fenced off parking lots and would not be easy to access by the community. It would also not connect anything besides two isolated ballfields to a parking lot that the ballfield users would not be able to park in.

CONCLUSION

Draft EIS states:

SUMMARY OF NEIGHBORHOOD IMPACTS

The analysis concludes that as a result of the proposed project, there would be no change in the types of land uses or design and scale of development located in the study area; however, the location of the various uses would be reconfigured in different locations. This would not result in an increase in traffic and pedestrian trips over existing conditions.

As a result of the proposed project, the New York Yankees, an important asset to the neighborhood and The Bronx, would remain in its historical Bronx location.

The proposed project would also have a positive effect on the character of the area. The proposed project would provide a net increase in the area's open space, and replace older, and in some cases worn, recreational facilities, with new, modern facilities. It would also create new access to the waterfront beyond what would have been provided in the future without the proposed project.

However, the proposed stadium would be located closer than the existing stadium to the predominantly residential neighborhood located north of East 161st Street and west of Jerome Avenue. That relocation would alter the visual setting and concentrate traffic and pedestrian impacts along 161st Street and the adjacent streets. Within the larger project area, there would continue to be a mix of parking, parkland, and stadium uses, which are compatible with each other and consistent with the park designation of much of the study area.

In summary, the proposed project would not significantly adversely affect the combined elements contributing to the neighborhood character of the study area. No significant adverse impacts to neighborhood character would result from the proposed project.

Response:

The conclusions reached by the DEIS with regards to neighborhood impacts are simply wrong and are based on flawed reasoning. It is clear to anyone with basic reasoning ability that the project as proposed would be disruptive to local residents, would cause a blighting impact on several historic buildings, and would replace viable parkland with inferior, less desirable facilities

SUMMARY OF BUSINESS IMPACTS

NEW RESTAURANTS IN STADIUM

Draft EIS states:

An approximately 300-seat restaurant located at street level would provide year-round operation with direct entry from outside the stadium, as well as access to the stadium concourse.

Premium Seat Lounges. Several lounges would be available to premium seat-holders, as follows:

- *The Legends Suite Lounges* would provide Legends suite seat-holders lounges with food and beverage service, including the Legends Suite Home Plate Lounge, which would be located behind home plate with an entrance from the Main Concourse, allowing direct access to the Legends suites. Glass frontage would provide natural light and views to the field.
- *The Grandstand Sports Club* would be an enclosed, air-conditioned suite seating area and lounge located directly behind the centerfield wall. It would consist of approximately 400 tiered seats within the suite that view the field and a lounge with seating and light food service. The club would be accessible from the stadium concourses.
- *The Stadium Club* would be a full service restaurant and bar located in the left field corner at the Suite Level with dining both within the club and on a terrace, which would provide a view of the field in a conditioned environment.

Response:

These new restaurants may have an impact on some of the existing neighborhood restaurants that draw their business primarily from Yankees fans going to games. While most of the restaurants seem to be targeted towards premium ticket holders only, the 300 seat restaurant would be open to everyone, even those not attending any games. This, coupled with the shift in position of the stadium away from existing neighborhood restaurants, may mean a loss of business for local restaurants.

NEW RETAIL IN STADIUM

Draft EIS states:

Retail. The main team store selling Yankees' merchandise would be at two levels in a prominent location, allowing entry from within the stadium. Two smaller satellite stores selling Yankees' merchandise would be located away from each other and from the main retail store to allow for better access to retail outlets for fans throughout the stadium. Novelty stands would also be provided throughout the concourses, distributed proportionately at high-traffic areas.

A Yankees store would also be located at street level and be accessible to the public from the street as well as from inside the proposed stadium.

Ground-floor retail space that would be provided at proposed Parking Garage D along River Avenue would be compatible with existing retail along the avenue, as well as with the retail that is expected to be developed at the Gateway Center at Bronx Terminal Market.

SUMMARY OF BUSINESS IMPACTS

Response:

Depending on the nature of the items sold at the Yankee Stadium retail stores, they may or may not compete directly with local businesses. However, where the souvenir market is concerned, the Yankee Stadium stores will probably do better since they are physically in the stadium.

Retail space should be provided in Garage D as a way to lessen the brutal streetscape it will create by creating a massive 5-story structure which spans over a local street. The retail spaces in Garage D should be given to local businesses.

NEW FOOT-TRAFFIC PATTERN AROUND STADIUM

Draft EIS states:

and help reduce the walk from parking facilities to the stadium, as

An at-grade, controlled crossing of East 161st Street at Ruppert Plaza would be created.

Between Heritage Field and the soccer field and athletic track would be a passive park with an alley of trees on re-aligned Ruppert Place. Renamed “Ruppert Plaza,” it would comprise 1.13 acres of new parkland. Ruppert Plaza would function as the main thoroughfare from the existing parking facilities, as well as proposed Parking Garage A, to the proposed stadium.

Rather, these trips would be redistributed within the transportation network, largely due to the future location of the proposed stadium, the addition of nearby parking facilities, and the provision of a dedicated pedestrian spine along Ruppert Plaza.

representing a net addition of approximately 3,022 spaces above existing parking supplies—would make it easier for fans driving to games to park closer to the stadium, resulting in less circulation on local streets in search of the currently often hard-to-find parking spaces.

(1) the proposed project would provide Yankees fans with thousands of new parking spaces close to the proposed stadium, thus relieving the area of excessive traffic circulation pre-game as motorists would no longer have to circulate on local streets in search of hard-to-find parking spaces, especially on sellout game days; (2) the proposed project would also eliminate some illegal parking on local streets and on the service road of the northbound Major Deegan Expressway since the parked cars could now be accommodated within off-street parking lots and garages; (3) the proposed project would result in a shift of vehicular traffic from some currently used traffic routes to others, primarily to streets such as Jerome Avenue, the Macomb’s Dam Bridge Approach, River Avenue, and others;

The proposed project is expected to result in similar overall transit use and pedestrian levels as currently exist in the surrounding area of the project site. to the change in terms of access patterns and the redistribution of pedestrian flow.

SUMMARY OF BUSINESS IMPACTS

Furthermore, by consolidating and better organizing parking in the area, the proposed garages would have a positive land use impact in the project area.

Response:

It appears that the design intent of the new stadium project is to re-direct pedestrian flows from the parking structures to the stadium. New parking structures will be built immediately adjacent to the stadium to minimize walking from the car to the stadium. Ruppert Plaza will also be used as a way to channelize pedestrian traffic from other garages south of the stadium to the stadium's front entrance. Since Ruppert Plaza will not have any retail along it, most of the people walking from the garages to the stadium under the new proposal will not pass any of the local businesses along River Avenue on their way to the stadium. This loss of pedestrian traffic in front of these businesses will likely mean a decline in business, particularly where "impulse purchases" – which require a high degree of visibility - are involved.

Perhaps shift of pedestrian traffic is being done as a logistical improvement for pedestrian flows? However, this seems unlikely due to the large numbers of people who will have to use a controlled pedestrian crossing at 161st Street – a concept that will likely lead to chaos or vehicle-pedestrian conflicts due to the high volume of traffic on 161st Street during game days. It could be hypothesized that this new pedestrian access pattern was devised deliberately – as a way to keep people from going to local businesses so that they spend more money in stores and restaurants within the stadium walls. However, nobody can expect the DEIS to give out this kind of information, so for now it can only be a theory.

CONCLUSION

Draft EIS states:

The analysis concludes that the proposed project would not cause significant adverse impacts to the socioeconomic character of the project's study area. would not directly displace any businesses or institutional uses. nor would it significantly alter existing economic patterns in the study area

As a result of the proposed project, the New York Yankees, an important asset to the neighborhood and The Bronx, would remain in its historical Bronx location.

The analysis concludes that the proposed project would not cause significant adverse impacts to the socioeconomic character of the project's study area... nor would it significantly alter existing economic patterns in the study area that would result in indirect displacement of businesses and institutions.

However, the proposed project would only locate the proposed stadium one block north of East 161st Street and, therefore, would not affect the customer base for the existing businesses along River Avenue.

Response:

It is true that if the Yankees ceased to exist in the neighborhood, that would be a huge blow to all of the existing stadium-oriented businesses. However, redesigning the stadium area as proposed will certainly

SUMMARY OF BUSINESS IMPACTS

serve to weaken these businesses over the existing conditions by diverting foot-traffic away from them. To ignore this fact is a flaw of the DEIS. “Only being a block away” is enough to make or break the viability of some of the businesses which rely on high visibility “impulse” sales. It is not good enough that the stadium has “only moved a block away.” This added distance and the change in foot-traffic patterns, coupled with new restaurants and stores within the stadium, could be the force that dooms several local businesses.

SUMMARY OF ALTERNATIVES

RENOVATION

Draft EIS states:

There is simply insufficient space within the existing stadium to accommodate the extensive needs and requirements for transforming it into a modern-day stadium.

For the stadium to function properly and provide a comfortable experience for fans, players, and the press, a nearly 100 percent increase in public concourse and fan amenity areas would be required.

Adequate practice space and batting cages are lacking, and there is only one weight room, which must be shared by both the Yankees and visiting teams.

Response:

The DEIS is too quick to dismiss this option. While it is not the option that the Yankees want, it will have a greatly reduced impact on the surrounding community. The rejection of this option begs the question: “who is more important: the Yankees or everybody else?” Should we place a monetary cost on the various aspects of peoples lives that will be harmed by this project and compare them to the economic benefits of a new stadium? Such an exercise would be a callous, insensitive way to examine a set of impacts – but no less callous and insensitive than insisting that the Yankees needs are more important than the members of our community and deserve an approval on this project despite the impacts it will have on everyone around them.

The Yankees’ preferred alternative would exact a great cost on the surrounding community. While the renovation alternative is less than the desired maximum for the Yankees, it is a better alternative for the community – and should be considered more thoroughly. The Yankees are not the only people in this community and they should not be allowed whatever they want at a cost to everyone else.

RECONSTRUCTION

Draft EIS states:

After completing the Stadium’s 50th-anniversary season in 1973, the Yankees moved to Shea Stadium for two seasons while their home was almost completely demolished and then rebuilt.

Reconstruction on the existing site was also considered, but was determined infeasible because of the physical limitations of the site and the consequent inability to provide a modern-day baseball facility. In addition, the reconstruction alternative would have required the use of portions of Macomb’s Dam Park for parking, without the opportunity to provide replacement recreational facilities on the site of the existing stadium.

Thus, any “reconstruction” of the stadium on its current site would require complete demolition of the existing stadium and construction of a totally new stadium on a site that includes the current stadium site, Ruppert Place, and the portion of Macomb’s Dam Park adjacent to Ruppert Place.

SUMMARY OF ALTERNATIVES

A stadium on the south side of East 161st Street between River and Jerome Avenues might be large enough to meet stadium criteria, but the result would be sharply inferior to the proposed project and would not meet several key project objectives. First, the House that Ruth Built, the 1923 stadium, would be entirely obliterated. In addition, Garage A could not be built, so this alternative would either fail to provide adequate off-street parking, would require that a parking structure be built along the waterfront,

the footprint would need to be expanded by 3.9 acres. it would entail creating a 65-footwide ring around the existing stadium and would effectively shut down East 161st Street, River Avenue (and the No. 4 elevated subway), and East 157th Street. Thus, any “reconstruction” of the stadium on its current site would require complete demolition of the existing stadium and construction of a totally new stadium on a site that includes the current stadium site, Ruppert Place, and the portion of Macomb’s Dam Park adjacent to Ruppert Place. This alternative was found infeasible and unacceptable, as follows

First, the House that Ruth Built, the 1923 stadium, would be entirely obliterated

In addition, Garage A could not be built, so this alternative would either fail to provide adequate off-street parking, would require that a parking structure be built along the waterfront,

Demolition and reconstruction of the stadium in an area containing today’s Yankee Stadium site would require the relocation of the Yankees to another venue for approximately four years. This is not possible today. The Mets are poised to build a new Shea Stadium next to the existing facility, which is widely acknowledged to be out of date. Having the Yankees play along with the Mets during construction of the new stadium would greatly exacerbate the parking impacts of the Shea Stadium project during its construction

In addition, the relocation would be particularly disruptive to the Yankees, and could be achieved only at a great cost—not only the cost of relocation, but also the costs related to loss of revenue from team sponsors who could not be accommodated at Shea. These cost penalties would likely be reflected in a substantial increase in public sector contributions to the project. For all of these reasons, any option requiring relocation of the team is completely unacceptable to the Yankees.

Response:

The DEIS makes a series of weak arguments to discount this alternative. A demolition and reconstruction of the stadium could be done in various ways – ways that are not explored by the document. While it may require the Yankees to move temporarily, so what? They did it in 1973 and it only took 3 years - why would it take 4 years in 2006? Construction techniques have improved. Also, it’s not like fans would stop caring about the Yankees if they had to go to Shea stadium to watch a game. People go to games to be entertained and because they like the team. It’s not like a reconstruction of the stadium would move the team so far away that nobody could get there.

SUMMARY OF ALTERNATIVES

In addition, any Shea stadium reconstruction projects could be delayed until after the Yankees reconstruction is finished. Perhaps a reciprocal deal could be worked out where the Mets would play at the new Yankee Stadium during the Shea Stadium reconstruction. There are lots of ways to look at this, and the DEIS is too quick to dismiss this option.

As far as other elements of the argument are concerned:

Garage A could not be built – So? Nobody wants this anyway since it will destroy a park
The House that Ruth Built, the 1923 stadium, would be entirely obliterated – Since when did the Yankees care about this? Notice how the only time the DEIS calls the old stadium “the House that Ruth Built” is when the Yankees are trying to discount the reconstruction alternative. The rest of the time, the stadium is called “an outdated, 82-year old facility.” There is clearly little regard for the historic nature of the old stadium in both the DEIS and by the Yankees previous threats to move to New Jersey. If they cared so much about it, why did they threaten to leave it as an abandoned building all of these years?

WATERFRONT GARAGE ALTERNATIVE

Draft EIS states:

Parking Garages A and C would be reduced in size and structured parking would be built on the waterfront in the location of Parking Lots 13A and 13B. Under the Waterfront Garage Alternative, it is estimated that 1,000 to 1,500 spaces would be removed from Parking Garages A and C as compared to the proposed project. Thus, the waterfront garage would need to accommodate the 852 spaces currently available in Parking Lots 13A and 13B as well as the spaces that would be removed from Parking Garages A and C for a total of 1,852 to 2,352 spaces.

require at least a four-story garage at this location to fully accommodate the 1,852 to 2,352 spaces. It would also require that the garage be built over a small inter-pier area at the southern end of the site

However, because the size of Parking Garage C would be reduced with the Waterfront Garage Alternative, it would be possible to locate its rooftop recreational facility at the level of the Macomb’s Dam Bridge Approach,

would have the potential to reduce significant traffic impacts at intersections along Jerome Avenue and the Macomb’s Dam Bridge Approach that would be expected to occur under the proposed project. Under this alternative, up to 2,352 cars would reach their parking spaces via southbound Exit 6 off the Major Deegan Expressway to “Bronx Terminal Market,” and would not circulate on the local street network.

Under the Waterfront Garage Alternative, more pedestrians would need to travel the length of Ruppert Plaza and cross East 161st Street there than with the proposed project

The Waterfront Garage Alternative would be inferior to the proposed project and was not selected for the following reasons:

- It would result in significant adverse impacts on historic and visual resources that could not

SUMMARY OF ALTERNATIVES

be mitigated. (you wouldn't be able to see the Macombs Dam Bridge)
It would be inconsistent with the goals and objectives of the Waterfront Revitalization Program.

Response:

This alternative is basically another version of the "preferred alternative" that would take some of the parking away from the parkland and place it on the waterfront. While it would allow a slightly more "hospitable" environment for the "replacement parks", it would also place a parking garage directly on the waterfront, which is not a desirable waterfront use. Therefore, it is not much better than the "preferred alternative"

NO ACTION ALTERNATIVE

Draft EIS states:

Lots 12 and 13D would be removed with the construction of Gateway Center at Bronx Terminal Market, resulting in a loss of parking as compared to today

Unlike the proposed project, the No Action Alternative would not displace parkland, nor would it cause a temporary loss of recreational facilities in the project area during construction. However, the No Action Alternative would not result in a 4.63-acre net increase in accessible open space, including 5.82 new acres of recreational waterfront parks and esplanade that would be provided as part of the proposed project. Therefore, although the No Action Alternative would not result in significant adverse impacts on open space, it would not provide new and enhanced recreational facilities and would, therefore, not have the benefits to parklands that would be realized with the proposed project.

The No Action Alternative would result in the same volume of auto trips being generated to and from Yankee Stadium as would the proposed project.

The No Action Alternative would not result in an increase in parking facilities or parklands in the vicinity of Yankee Stadium. The waterfront would not be developed under the No Action Alternative, so that approximately 261,000 square feet of retail space would be constructed on this site, as proposed in the *Bronx Terminal Market Draft Environmental Impact Statement*.

New York City would continue to collect rent on the existing stadium, but would spend money for stadium upkeep, leading to a direct deficit of \$77 million over a 30 year period under the No Action Alternative.

However, since the No Action Alternative would not provide new public open space along the Harlem River, it would not provide for the new visual resources that would be realized with the proposed project.

The No Action Alternative would not result in the removal of mature street trees or the alteration of existing parkland, Yankees fans driving to the stadium would continue to circulate excessively through the area in search of hard-to-find parking spaces on-street.

SUMMARY OF ALTERNATIVES

would not be expected to generate new traffic.

Response:

The “no action” alternative reads like it is the best alternative for the community. The community would get to keep all of its well-used and well-loved parkland. Plus certain already programmed parks improvements would get built anyway. No mature trees will get chopped down. There would be no adverse neighborhood or business impacts. Traffic would probably not get any worse than it already is.

The only bad impacts would be to the Yankees. They would lose some parking because of the Gateway Center project at the Bronx Terminal Market site. This would probably make it harder for some fans to find parking for the game, so they’d have to either carpool with other fans or take public transit to the site, which is what they should be encouraged to do anyway.

The existing, cramped conditions at the stadium would continue. The Yankees would have to share a weight room with the opposing team. The press would have to sit with the fans. Expensive luxury seating, restaurants and parking couldn’t be added to the stadium to generate more revenue for the team. How could the community (one of the poorest zip codes in the country) be so insensitive to the needs of the wealthiest team in baseball? It smacks of injustice.