

CHINATOWN WORKING GROUP

Community Planning Its Future

c/o Community Board #1 Manhattan
49-51 Chambers St., Rm 715
New York, New York 10007
Co-Chairs: Jim Solomon & Thomas Yu
Secretary: Amy Chin
www.chinatownworkinggroup.org

May 14, 2010

The Honorable Ray LaHood
Secretary
U. S. Department of Transportation
1200 New Jersey Avenue, SE, 9th Floor
Washington, DC 20590

Dear Secretary LaHood:

On behalf of the Chinatown Working Group (CWG), we want to thank you for generously offering to meet with us. We look forward to discussing with you a number of federal-oriented transportation issues in Chinatown this Wednesday, May 19, 2010, 12:30-2pm. We selected the Chatham Green Apartments Community Room for our meeting as its location relates to one of Chinatown's major transportation (and "quality of life") issues – The Park Row Closure.

Per your office's request, we have identified six priority issues in Chinatown to discuss with you. Attached you will find brief background information on each as well as on the CWG, specific questions and/or proposed potential "short" and "long" term solutions.

Our top three "priority issues" for discussion (in no particular order):

- . Interstate and Long Distance Buses
- . The Park Row Problem
- . Verrazano-Narrows Bridge Tolling and Canal Street

Time permitting, we would also like to discuss with you:

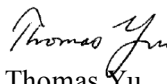
- . Canal Area Transportation Study (CATS)
- . Federal Garage (Howard St., between Centre and Lafayette Sts.)
- . SAFETEA-LU (Safe, Accountable, Flexible, Efficient Transportation Equity Act: A Legacy for Users)

There are, of course, many other items we would like to cover if time allows. You have our sincere appreciation for your interest.

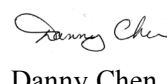
Sincerely,



James Solomon
Co-chair
Chinatown Working Group



Thomas Yu
Co-chair
Chinatown Working Group



Danny Chen
Chair
CWG Parking, Transportation,
Circulation & Safety
Working Team

1. INTERSTATE AND LONG DISTANCE BUSES

The "Chinatown Bus" network connects all urban cores on the eastern seaboard and the Midwest with non-stop coach bus service. This network was built by small businesses and is now an economically important part of the national transportation infrastructure. These buses typically do not use the shared bus terminals in major cities, but do passenger loading/unloading curbside in Chinatown neighborhoods. The congestion and pollution is an externalized cost borne by these neighborhoods, which lessen the economic benefits provided by the service. Please refer to the "Chinatown Bus Study" (NYC Dept of City Planning, October 2009) for a detailed explanation of the business model and operations. (Also see May 2010 article in *Gotham Gazette*: "For Budget Buses, Chinatown's Clogged Streets Are Wide Open" <http://www.gothamgazette.com/article/Transportation/20100512/16/3265>)

The CWG and NYC could use Federal assistance on both short- and long-term recommendations:

The short-term recommendation is to re-regulate the industry -- not deregulate -- since the problem is that effective operations are completely deregulated in NYC. The City, State and Federal regulatory framework needs to be streamlined so that City agencies can devise measures to improve traffic flow and public safety. The City DOT, Department of Intergovernmental Affairs and our State legislators are working on legislation and are in discussion with their contacts at the Federal level. We need the USDOT to collaborate on the best solution for managing the industry and its inevitable growth. Ultimately, this includes everything from designing the license application process, to allocating suitable curbside spaces, to facilitating proper enforcement.

The long-term recommendation is to build a downtown bus terminal. This would be very expensive, since there is no obvious suitable location that is publicly owned. Other cities have done this. Federal dollars would greatly help in NYC.

2. THE PARK ROW PROBLEM

Upon the attacks of 9/11, a lockdown was imposed on Lower Manhattan. Many people do not realize that nearly 9 years after 9/11 an area larger than Ground Zero remains frozen in a security lockdown. This lockdown and, with it, the closure of Park Row, continues to have a huge negative impact on Chinatown and Lower Manhattan.

The post 9/11 impact of the street closures on New York's Chinatown has strong parallels to the effects of the 1989 Loma Prieta earthquake on San Francisco's Chinatown. In 1989, the earthquake severely damaged parts of the Embarcadero Freeway -- a major freeway that provided an access point into San Francisco's Chinatown. Rather than repair the elevated sections of the Embarcadero, San Francisco decided to dismantle it creating tremendous access issues for their Chinatown -- with effects that appear to continue to this day. See [\[1\]](#)

In New York City, the NYPD has kept Park Row closed because of security concerns around their own Headquarters and the Federal Detention Center on Park Row. The Chinatown Work Group formed a Transportation, Security, and Economics committee because of the interplay between security, transportation, and economics. We have identified the following problems as a direct result of the street closures:

- Delayed emergency vehicle response times¹
- Loss of access to/from Chinatown
- Creation of traffic bottlenecks at numerous streets and intersections in the area.
- Establishment of a "war zone" feel to the area

Furthermore, the unusual placement of delta barriers on the northern end of Park Row, hundreds of feet from either Police Headquarters or the Federal Courthouses and Detention Center, underneath the windows of two residential co-ops (one with 420 units and the other with 240 units) presents an unnecessary danger to the residents of these co-ops.

Secondary effects of the street closures include the loss of on street parking, which has not only affected local businesses but also places of worship.

In the short term, we request that the Transportation Secretary initiate a Federal, independent analysis of the transportation and security requirements for the area. To date, we do not believe security policies have adequately taken into account the residents and businesses of Chinatown and Lower Manhattan.

The community's near unanimous opinion is these policies serve NYPD's interests to the exclusion of the greater interests of Lower Manhattan and New York.

On the one hand, local residents and businesses have borne the brunt of the burden of these security measures - with the extremely asymmetric perimeter around Police Headquarters putting much more burden on the Chinatown side of their campus. On the other hand, whole areas of vulnerability appear to be completely ignored. Some of these vulnerabilities relate to the concentration risk of having so many sensitive government operations within a small area. For example, we have learned that there are HUGE amounts of diesel fuel being stored under the Municipal Building and under One Police Plaza -- situated above and beside the tracks of the MTA's subway system and at the foot of the Brooklyn Bridge. This concentration risk will only be exacerbated by the establishment of the proposed Joint Operations Command Center on the Police Headquarters Campus. The decision to locate the JOCC in Lower Manhattan is ironic given Police Commissioner Kelly's statements regarding the poor judgment of the Giuliani Administration's choice of 7 World Trade Center for a previous command bunker.

Pending the results of an independent security analysis of the area, we request that the Transportation Secretary work with Homeland Security to devise a concrete plan to mitigate the danger to the residential community by relocating potential targets away from the densely populated areas of Lower Manhattan.

Any targets that cannot immediately be relocated should be secured in a way that does not require closing major arteries like Park Row. If high profile targets along Broadway can be secured without complete closure, then the same should be achievable on Park Row.

1 The NYPD disputes the claim that emergency vehicle response times have been delayed.

3. THE VERRAZANO-NARROWS BRIDGE ISSUE

You might wonder why a bridge ten miles away from Canal Street could be a top priority transportation issue for New York's Chinatown. Answer: the one-way toll collection, mandated by Congress in 1986.

The Verrazano-Narrows Bridge connects Staten Island to Brooklyn, to its east. It was built in part with federal monies. From 1964 to 1986, tolls were collected in both directions. Vehicles traveling to New Jersey from Brooklyn tended to cross the Bridge and then take highways on Staten Island, rather than go through Manhattan and use city streets to get to the Holland Tunnel. However, at the urging of the Congressman from Staten Island, Congress added a provision to the Department of Transportation and Related Agencies Appropriation Act of 1986 mandating that tolls would only be collected from westbound traffic, or a penalty of 1% of the State's federal transportation fund would be withheld. Traffic going to Staten Island from Brooklyn would pay a double toll, but have a free ride by traveling through

the already congested streets of Lower Manhattan. This proved a disaster for our neighborhood.

In 1988, the federal mandate for the one-way toll was lifted at the request of the Metropolitan Transportation Authority (MTA) and the Governor. This means no statutorily imposed penalty would result if the Triborough Bridge and Tunnel Authority (TBTA) were to collect tolls in both directions. Despite a second environmental impact study in 1993, whose results clearly indicated that the impact of the one-way westbound toll on Lower Manhattan was significantly greater than a two-way toll would be on Staten Island, the TBTA has continued to collect tolls only from the Bridge's westbound traffic, thereby diverting trucks and other vehicles into Lower Manhattan.

We have identified the following problems in Chinatown either to be as a result of this one-way toll collection or exacerbated by it in a significant way:

- Severe congested vehicular westbound traffic on Canal Street, particularly large interstate trucks, on a day-long basis, extending all the way from the Manhattan Bridge to the Holland Tunnel.
- Over-capacity demands on the westbound Holland Tunnel.
- Severe congested vehicular westbound traffic on Delancey, Kenmare, Broome and Lafayette Streets, particularly between 3 pm and 8pm on Fridays, all day on Saturdays and Sundays, and evening rush hours during the week, extending from Lafayette Street to the Holland Tunnel entrance.
- An increase in local-area air pollution problems.
- The revenues of the Triborough Bridge and Tunnel Authority were reduced by approximately \$10 million a year, which impacted the funding of transit services provided by MTA.
- Lack of development of Canal Street properties due to adverse impacts on business patronage and truck deliveries.
- Hazardous conditions for pedestrians and bicyclists.
- Concern and annoyance to residents.

Especially now, with the advent of EZ Pass, we believe there is no reason at all not to reinstate two-way toll collection at the Bridge. Doing so would significantly reduce the negative impacts in heavily populated Lower Manhattan and Brooklyn without increasing them for Staten Island. It would move traffic faster. And it would increase revenue for the MTA.

We believe it would aid overall economic growth and improve quality of life in Chinatown.

We request that the Transportation Secretary help us reinstate the two-way toll on the Verrazano-Narrows Bridge.

* * *

Time permitting, we would also like to discuss with you:

4. CANAL AREA TRANSPORTATION STUDY (CATS)

The Canal Area Transportation Study (CATS) grew out of two applications [first by Community Board 2 Manhattan (1998) and then by Canal West (2001)] for federal funding under the CMAQ (Congestion Mitigation Air Quality) program to mitigate the impacts of the Canal Street transportation corridor in Lower Manhattan on all aspects of the quality of community life. In response to the CMAQ proposals and overwhelming concerns by the public and elected officials, the NYS Department of Transportation and the New York Metropolitan Transportation Council (NYMTC), the region's transportation planning organization (MPO), sponsored a Canal Street study on their federally funded UPWP (Unified Planning Work Program).

This major study was under development in 2001 when 9/11 occurred. The study was then revisited in light of major changes to travel patterns in lower Manhattan, consequently, the first phase (Track I) was initiated in 2002, to identify short-term, localized improvements. Track II (beginning 2005) has emphasized a more regional and multi-modal approach to identify and develop medium- and long-term transportation investments and improvements.

We now have been informed that Track II is reaching completion. Reconstruction is estimated to begin 2012 (although doubtful, since the study is behind). We are hoping to have input on the final recommendations and are concerned that there will be sufficient funds for any revisions in keeping with our needs and for implementation.

Our questions: Will there be adequate attention given to community input in the final phase? Is there enough funding left in case modifications in recommendations are needed? Are there funds for implementation included for the project? We want to make sure that once final recommendations are reached that they can be implemented (even if at this point we're not sure we will agree with all of them and modifications may be needed). Is there a time line for completing project implementation?

5. FEDERAL GARAGE (Howard Street, between Centre and Lafayette Streets)

Many residents attribute the worsening of neighborhood parking problems in part to the closing of a local, low-cost public municipal parking garage under Police Plaza in early 2001. The municipal garage was originally closed to make way for a 9-1-1 emergency phone center, but the city dropped the phone center proposal after the World Trade Center attack. Nevertheless, the once-municipal garage remains open only for use by police and official vehicles.

The lack of municipal parking in the area has caused many to identify and propose one under-utilized lot in the area to be open for use by the community: a federal garage located on Howard Street between Centre Street and Lafayette Street. (The building is listed on the GSA website with the address of 203-209 Centre Street: <http://www.iolp.gsa.gov/iolp/BuildingInfo.asp?bID=NY0311>)

The garage currently sits empty for community use; we believe the lot would best serve the community if it were opened up for municipal use.

6. SAFETEA-LU (Safe, Accountable, Flexible, Efficient Transportation Equity Act: A Legacy for Users)

As you know, SAFETEA-LU is the successor of ISTEA (Intermodal Surface Transportation Efficiency Act - 1991), the first major United States federal transportation planning and policy law that addressed not only highways but presented an overall intermodal approach to highway (including streets, roadways, etc.) and transit funding. As a result of ISTEA, and now SAFETEA-LU, passed in 2005, we understand that federal funding can be provided for creative (local) projects integrating transportation into our communities and environment above and beyond common transportation practice.

We recognize, for example, that emphasis is on improving non-motorized transportation (e.g. transit), enhancing the public's traveling experience, revitalizing communities, restoring/reusing historic transportation structures and providing other transportation enhancements, and improving quality of life. We also welcome the requirement for public involvement in planning.

With SAFETEA-LU providing opportunities to fund improvements in mobility, environmental protection, community preservation, pedestrian safety, sustainability and livability, we are most interested

in learning how we might make use of this legislation to benefit our own community. We also hope that this legislation and the improvements it offers will be renewed, as we are aware that SAFETEA-LU expired in 2009, and that since then, it has been extended several times, but eventually needs to be re-authorized.

Our questions: When is it expected that SAFETEA-LU will be re-authorized? Our community would appreciate some guidance in what types of projects through SAFETEA-LU can be initiated that would provide funds to improve pedestrian safety, enhance our quality of life, retain our historic character, help promote economic development and protect our environment and how we can access funding? Is it possible for US DOT to give a presentation/workshop(s) to educate the community about this and how transportation can be used to build a more livable, sustainable community?

A Brief History of the Chinatown Working Group

The Chinatown Working Group (CWG) was established in the Fall 2008 with a not so simple goal: to create a democratic, transparent and, within New York City's Chinatown, unprecedented community-based planning initiative to self-determine Chinatown's future.

The CWG is comprised of Chinatown's "stakeholders" -- at present, fifty member organizations with varying backgrounds, affiliations and interests including all three Community Boards covering portions of Chinatown (CBs #1, 2 & 3). In addition, the CWG has worked closely with the electeds representing Chinatown, whose staff regularly attends CWG meetings.

The full CWG meets monthly, and also regularly in smaller working groups. All CWG meetings are open to the public and on-the-record. A schedule of meetings, minutes and relevant materials are available on the CWG's website: www.chinatownworkinggroup.org

For more than a year, CWG Working Teams have focused on areas of concern in Chinatown:

- Affordability
- Culture & Historic Preservation
- Economic Development & Revitalization
- Education & Schools
- Immigrant Affairs & Social Services
- Parks, Open Space & Recreation
- Traffic, Transportation & Security
- Zoning

In addition, the CWG has hosted two Town Halls attended by hundreds to gather additional community feedback, the most recent of which was conducted in five languages (English, Spanish, Mandarin, Cantonese & Fukinese).

Through these efforts, the CWG has been busy drafting a comprehensive community-based plan for improvements to the greater Chinatown area. Later this year, in conjunction with CBs #1, 2 & 3, the CWG will submit a comprehensive, community-based 197-a Plan for Chinatown to the NYC Planning Commission. Once approved by the Commission and adopted by the City Council, 197-a plans guide future actions of city agencies in the areas addressed in the plans.

Recently, the CWG received a substantial grant from the Lower Manhattan Development Corporation for the purpose of hiring a professional planning firm to help satisfy considerable planning requirements under a 197-a Plan.

For more information about the CWG, please check: www.chinatownworkinggroup.org

VOTING MEMBERS: American Legion Post 1291 • Asian American Arts Alliance • Asian American Arts Centre • The Asian American Legal Defense and Education Fund • Asian Americans for Equality • Bowery Alliance of Neighbors • Chatham Green • Chatham Towers • Chinatown Business & Property Owners Group • Chinatown Partnership • Chinatown Rotary • Chinatown YMCA • Chinatown Youth Initiatives • Chinese American Medical Society • Chinese American Planning Council • Chinese Consolidated Benevolent Association • Chinese Chamber of Commerce of NY • Chinese Progressive Association • Chinese Staff & Workers' Association • Committee Against Anti-Asian Violence • Community Board #1 Manhattan • Community Board #2 Manhattan • Community Board #3 Manhattan • Community Emergency Response Team, CB#2 • Confucius Plaza • Continental Garment Manufacturers Association • CREATE in Chinatown • Education Alliance • Friends of Columbus Park • Good Old Lower East Side • Greater Chinatown Community Association • Hamilton Madison House • Hester Street Collaborative • Hotel Chinese Association • Immigrant Social Services • Indochina Sino-American Community Center • International Chinese Transportation Professionals Association • Lin Sing Association • Lin Ze Xu Foundation of USA • Lower East Side Business Development • Lower Manhattan GOP • M'Finda Kalunga Community Garden • Museum of Chinese in America • National Mobilization Against Sweatshops • The Pistol Club of Greater Chinatown • PS130M Parents' Association • St. Vincent's Hospital • 318 Restaurant Workers Union • Two Bridges Neighborhood Council • United Fukinese American Association FRIENDS: Office of U.S. Congressman Jerrold Nadler • Office of State Assembly Speaker Sheldon Silver • Office of the Mayor's Community Affairs Unit • Office of City Council Speaker Christine C. Quinn • Office of Manhattan Borough President Scott M. Stringer • Office of Public Advocate Bill de Blasio • Office of City Comptroller John C. Liu • Office of State Assembly Member Deborah J. Glick • Office of State Senator Martin J. Golden • Office of State Senator Daniel Squadron • Office of the New York County District Attorney Cyrus R. Vance, Jr • Office of Council Member Margaret Chin • LES Residents for Responsible Development • NohoManhattan.org • Sanctuary for Families • 250 Canal Street (ABS Partners) SUPPORTERS: Municipal Art Society Planning Center