



DEFENDERS OF TEDDY ROOSEVELT PARK INC.

April 6, 2016

To: Parks Department, City of New York

From: Adrian Smith, president, Defenders of Teddy Roosevelt Park Inc.

Re: Draft Scope of EIS for the Gilder Center, American Museum of Natural History

BACKGROUND

The Defenders of Teddy Roosevelt Park is a community-based organization formed last July by citizens alarmed at the American Museum of Natural History's proposed massive expansion into Theodore Roosevelt Park for construction of the Gilder Center. In response to the opposition, the AMNH eventually reduced by 50% the amount of parkland that would be lost to the expansion – a significant victory.

The Defenders, with roughly 3,000 supporters, still has concerns. Above all, we are dedicated to preserving the park's treasured role as a tranquil, intimate gathering place for the community – a "sweet spot" for residents of the high-density Upper West Side. With that in mind, we submit comments and questions regarding the draft scope of the EIS for the Gilder project. The draft is extensive and covers many issues well. However, we believe the draft has gaps and ambiguities that need to be resolved.

PARK RESTORATION

The draft indicates the AMNH's plans to replace lost trees, add benches and revise the path to the museum's new entrance. But will the park's function as a community oasis be fully restored? At stake is not simply soil or trees but how the park is used by its neighbors. The AMNH has created a Park Working Group to address such questions. The Defenders are participating. The draft should explain specifically how the AMNH will sustain and support that effort, including allocation of sufficient funding and other resources to help develop and maintain a re-created park area.

MASS OF THE GILDER CENTER

The Gilder Center would now occupy about one-quarter acre of parkland, down from an original encroachment of about a half-acre. While we welcome the reduction, we continue to question the structure's mass and visual impact on the tone and texture of this small park. The AMNH argues that the proposed configuration is needed to solve internal flow and circulation issues. However, has the AMNH examined all reasonable ways to achieve its goals with a less imposing structure? It is hard to say because schematic plans are still being drawn and have yet to be shared publicly.

(The Gilder Center, it should be noted, is bigger than it sounds. The draft scope says it will be five stories tall. In passing, the draft also notes that the building will rise to 105 feet – or about 10 stories in conventional construction, depending on ceiling height.)

USE OF THE CENTER

According to the plans made public last November, the southern portion of the proposed building is to be utilized for classrooms, labs, and a library, as well as for hallways connecting existing buildings.

Explain why the footprint of this portion of the proposed building cannot be made significantly smaller by utilizing one of the following options:

- 1) Placing all or most of the indicated educational facilities in an off-campus structure located close enough to the existing museum to maintain sufficient accessibility to collections;
- 2) Removing a number of back-office functions to an off-campus structure, thereby freeing up space in existing buildings for some or all of the proposed educational facilities;
- 3) Reducing the size of the classrooms, labs, library and hallways indicated on the plan.

LOBBY OF THE CENTER

The architect's rendering of the central portion of the proposed building depicts a very large entrance lobby for what will remain, according to AMNH estimates, a secondary entrance to the museum. Explain why the footprint of this portion of the proposed building cannot be made significantly smaller by reducing the size of this entrance lobby.

UNDERGROUND DRIVEWAY

The draft scope almost entirely neglects the proposed construction of an underground service driveway running from 78th Street to the Gilder Center. The draft simply says "service areas...would be replaced or improved." In fact, the AMNH originally proposed a driveway excavation that would remove two mature canopy trees with trunks more than two feet in diameter, one of them a majestic English elm. After we raised concerns, the AMNH is now considering possible revision in the driveway layout that could save one or both of the trees. The draft should assure that the EIS pursues this mitigation.

DEGRADED PARKLAND

Soil will be replaced on top of the structure of the proposed underground driveway (see above). However, the draft does not address the depth of the soil. Will the soil be deep enough to support trees needed to restore a shady canopy central to the park's character? What steps will be taken to assure sufficient soil depth for optimal tree health?

AMNH ATTENDANCE

The museum's forecasts of increased attendance are very important to the project's environmental impact, but they are fuzzy. They speak of "incremental increase" in attendance and project a 500,000 increase in "ticketed attendance." How was that estimate reached? What methodology was deployed? When would the 500,000 be reached? How far into the future do the projections look? Is the steady rise in New York City tourism taken into account? (The city had a record 58.3 million visitors last year and has a goal of reaching 67 million annual visitors by 2021.)

The AMNH has said it expects the new entrance to serve about 18% of museum visitors, compared to about 9% today. With an annual attendance now of about 5 million, that means the new entrance would serve about 900,000 annually. Again, on what survey or analysis are those projections based?

POPULATION PRESSURE

The draft largely neglects growth in neighborhood population density, which will place more pressure on Theodore Roosevelt Park. Community District 7 is home to about 212,000 people and supports approximately 50% more people per acre than the average for Manhattan and four times more people per acre than the average for New York City. New apartment buildings keep rising in the area (for example, new buildings are underway on nearby 79th and 80th). What does that trend mean to pressure on our pocket park?

FOOD CARTS

The draft does not address potential air pollution from food carts. It should be noted that more foot traffic at the 79th entrance would attract food-preparation carts that create noxious fumes blown by the prevailing westerly wind into park's sitting areas. While carts are beyond the AMNH's jurisdiction, the museum's expansion and increased pedestrian traffic would stimulate the activity. What can the AMNH do, in conjunction with other city agencies, to prevent the pollution?

(Another food service problem is posed by Shake Shack, a popular fast-food restaurant at 77th and Columbus, whose thousands of patrons often use the park, sometimes overflowing garbage containers while competing for benches.)

TRAFFIC

Each year, about 350,000 students are brought by yellow school buses to the AMNH. The buses generally park on Columbus Avenue and other streets, adding to traffic congestion and diminishing enjoyment of the park, especially for people using sidewalk benches along Columbus Avenue. While the AMNH says that there will be no increase in school buses, the existing bus problem should not be neglected, especially given the concern over heightened activity in the area. How will the recurring school bus problem be addressed? Will the museum guarantee that such busing will not creep higher in years ahead?

CONSTRUCTION PHASE

During construction, neighbors will need access to the park. Given that the West 79th Street entry will be closed by workers, will a temporary entry be made at West 80th Street? Above all, what will the museum do to provide the current amount of space – along with sufficient benches – for the community to gather, relax and recreate safely and conveniently?

How will the museum deal safely with hazardous materials that might be encountered once construction starts? And how will it abate noise associated with excavation?

RAT CONTROL

In recent years, rats have increasingly infested Theodore Roosevelt Park, impairing park use especially after sundown. Eradication has been difficult. Construction is likely to enlarge the problem by dispersing rats into the neighborhood. What steps will be taken to counteract this danger?

SUMMARY

We believe we have offered comments and questions that, if adequately addressed, will sharpen and deepen the environmental review of the AMNH's proposed expansion into beloved Theodore Roosevelt Park.