

YANKEE STADIUM REPLACEMENT PARKLAND
AS REGULATED UNDER THE LAND AND WATER CONSERVATION FUND ACT

INCONSISTENCIES WITH THE CONSTRUCTION OF
PARKING GARAGE A AND RUPPERT PLAZA,
AS COMPARED TO WHAT WAS PRESENTED AT
DURING LWCF AND NEPA REVIEWS

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As part of the review for the Yankee Stadium replacement parks under the required Land and Water Conservation Fund Act (LWCF) conversion, the Yankees, the New York City Department of Parks and Recreation (NYCDPR) and the NYS Office of Parks, Recreation and Historic Preservation (NYSOPRHP) presented their reasoning for the conversion in two separate documents as part of the NEPA review: the *Environmental Impact Statement* (final dated February 10, 2006) and “*COMMENTS AND RESPONSES to PUBLIC COMMENTS on the PROPOSED CONVERSION OF PARKLAND in conjunction with the PROPOSED DEVELOPMENT OF THE NEW YANKEE STADIUM*” (dated May 2006) and signed off by Thomas B. Lyons, Director, Environmental Management Bureau, NYSOPRHP

The final EIS showed the rendering below with regards to the interface of the Parking Garage A Park to Rupert Plaza and Heritage Field.



Alternative Park Plan
Proposed Heritage Park - View Looking Southeast
Figure S-15

The interface between the Parking Garage A Park and Rupert Plaza/Heritage Field was also discussed in “*Comments and Responses*”:

Comment 14: The applicants claim that the “park” above Parking Garage A would be accessible at grade level. An important distinction that is always left out of this statement is that the grade level accessibility would only be from the Macombs Dam Bridge approach—a roadway that nobody lives on, and a roadway that is higher in elevation than Rupert Plaza and the replacement park on the former stadium site. Since this would require an elevation change where the two park areas meet, a continuous swath of parkland would not be created in a true sense since one would not be able to travel from one park area to the other without ascending stairs or an elevator to get to the roof of Parking Garage A. (SOP) The proposed park atop Garage A would be above grade where it interfaces with Rupert Plaza and the new “Heritage Field.” Parking Garage A will be above ground where it would approach the replacement parcel. The top of Parking Garage A would be the same elevation as the Macombs Dam Bridge Approach, which is substantially higher in elevation, meaning that the replacement park will be above grade at this location. Project renderings acknowledge this by showing a set of 13 stairs ascending to the park from Rupert Plaza. If the spacing between the stairs is 8 inches, then the park will be at least 8.5 feet above the grade at Rupert Plaza. Since the rendering is purely illustrative, the community could have any type of design treatment for the parking structure along Rupert Plaza. This means there could easily be an 8.5 foot tall blank wall along the entire length of Rupert Plaza. (SOP)

Response: As described in the FEIS, this park will be accessible via a short set of stairs and ADA-compliant ramps from the new pedestrian-only Rupert Plaza and will be accessible at-grade from surrounding streets. Although not fully designed at this time, an ADA-compliant ramp will lead from the Garage 8 pedestrian bridge into Rupert Plaza to provide access to the large central park area between East 157th and 161st Streets. The distance between the top of Garage A and Rupert Place varies between zero at the center of Rupert Place, 12.5 feet at the East 161st Street end, and 10.5 feet as Rupert Place meets East 157th Street. Essentially, Rupert Place has a crown at its midpoint and bows down to meet East 157th and 161st Streets. Where there is a grade separation between the park and Rupert Place the intention is to create a landscaped berm. This zone will include horticultural plantings and may include a water feature. The area will not contain a blank wall, but will unify the parkland on both sides of Rupert Plaza. The two sections of park flanking Rupert Plaza will function together as an integrated whole. See also the response to Comment 13, above.

While the passage from “Comments and Responses” seems to describe a vision that is even better than the final EIS rendering (with zero grade separation at the center of Rupert Place, horticultural plantings and a water feature), the truth is that the community is getting something more like a blank wall, that is in fact higher above the surrounding grade than the Comment 14 suggested. The pictures below detail how the statements made in the above documentation are not being honored.



The above picture shows an entranceway far different than the rendering. It has more than twice the number of stairs depicted (27 stairs) for an approximate height of 17 feet: almost 2 stories. It is unclear how a landscaped berm could be constructed around this, particularly since access would need to be provided to the ADA-accessible ramp (pictured below). This ramp leads into the parking garage where an elevator is located, making the garage the official entrance to the park for persons with disabilities.





Concrete pedestrian access ways are being constructed from the parking levels of the garage directly into Ruppert Place. It is unclear how a landscaped berm with plantings and a water feature could also be constructed here while incorporating this access way. It is clear from this picture that Ruppert Plaza was never intended to serve as a replacement park, but rather as a large pedestrian conduit from Parking Garage A and the nearby Metro North station for game-attending crowds.



Parking Garage A also appears to have a moat-like depression surrounding it with even more stairs to provide access up to Ruppert Place from the lower level of the garage. Again, it is unclear how a landscaped berm and water feature can be constructed over this depression to help “unify the parkland on both sides of Ruppert Plaza”. The problem is exacerbated further by the placement of the base of the light pole (shown in the left side of the picture) which would need to protrude up through this berm amongst whatever horticultural plantings could be put there along with the water feature.

It is obvious that the statements made by the City and State parks departments at the time of the LWCF review are not being honored. The community is getting a park on top of a 2-story parking garage, with a blank-wall façade, surrounded by a moat. The New York City Parks Department and the New York State Office of Parks, Recreation and Historic Preservation appear to be in violation of Section 6(f) of the Land and Water Conservation Fund Act.