



December 8, 2021

STATEMENT OF THE NEW YORK LANDMARKS CONSERVANCY BEFORE EMPIRE STATE DEVELOPMENT REGARDING THE PENN STATION AREA REDEVELOPMENT PROJECT

The New York Landmarks Conservancy is a 48-year old organization dedicated to preserving, revitalizing, and reusing New York's historic buildings and neighborhoods.

We support improving Penn Station. But we ask you to halt this proposal. There has been no comprehensive explanation of the plan and funding, no broad public outreach, and no discussion of the thoughtful alternatives proposed. We need to be sure this is done right.

We understand the pivotal role of this site. For nearly three decades, we championed Senator Daniel Patrick Moynihan's vision for adapting the Farley Post Office as a transportation hub and we celebrated the opening of Moynihan Train Hall. Here and across the City, revitalization and reuse of historic buildings has proved to be an effective strategy to attract businesses, residents, and visitors. We believe that is the right approach for the area around Penn Station.

We are dismayed to see the widely discredited policy of urban renewal as the centerpiece of this plan. The complete vision for the area, including areas under separate agency purview, such as block 780, calls for the demolition of over 50 historic buildings, some of which are listed or eligible for listing on the National Register of Historic Places. Preservation rose from the ashes of the old Pennsylvania Station. In the decades since, we've seen that the dynamic mix of old and new is what makes New York unique and successful. It should not be so lightly discarded.

We were equally dismayed to see this profoundly anti-urban proposal, based on eminent domain. The State assumes this neighborhood should be sacrificed. This is a vibrant commercial district with a variety of buildings that support a diverse array of activities and businesses. The renderings for the new public spaces present an anodyne vision that could literally be anywhere in the world.

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All of the existing buildings contain embodied energy that will be lost forever. The proposed new construction will use untold amounts of resources and take decades to reach carbon neutrality.

The opaque process around this proposal has left out New York City's residents. It has abandoned hard-fought, transparent zoning and community engagement practices. It adds millions of square feet of new development with none of the local zoning controls that every other building owner has to follow. A project that will have such a significant impact on the City should follow ULURP, the City's well-established process for zoning applications.

You point to multiple stakeholder meetings over several years. Many of those were private sessions. There was little media attention. And this project has been segmented. By the time this meeting is over, there will have been about eight hours total of public engagement for a plan that intends to entirely transform a section of the City.

Because of the segmented process, we have heard scant details about how funds will be generated, and how they will be spent to benefit the City. The East Midtown rezoning offered specifics on how funds would be generated and exact metrics between additional FAR and specific transit improvements. It required developers to complete transit improvements before receiving temporary certificates of occupancy. We request a transparent analysis of the costs to acquire the development sites, construct the new buildings, and complete the transit improvements.

This plan relies on an unlimited demand for new commercial office space. We believe in the future of New York, but current projections raise significant questions about that assumption. We have East Midtown, Hudson Yards, and the World Trade Center. If a need for more office space emerges, buildings like the ones set for demolition will be well-positioned to address it. Further, in the midst of a housing crisis, proposing some 1,800 apartments out of 18 million square feet is absurd.

There will be new City administration and Council shortly. A pause would give time to elicit their views, have a transparent process that includes comprehensive



community information and exchange, and answer the many questions raised about whether this is the best way to create a station the public deserves.

Thank you for the opportunity to express the Conservancy's views.