



June 24, 2022

STATEMENT OF THE NEW YORK LANDMARKS CONSERVANCY BEFORE THE NEW YORK STATE SENATE STANDING COMMITTEE ON CORPORATION, AUTHORITIES AND COMMISSIONS AND THE SENATE STANDING COMMITTEE ON FINANCE REGARDING THE PENN STATION AREA REDEVELOPMENT PROJECT

The New York Landmarks Conservancy is a 49-year old organization dedicated to preserving, revitalizing, and reusing New York's historic buildings and neighborhoods.

We thank you for holding this hearing. It is remarkable to realize that the Penn Station plan could be approved in a month, when so much is unknown about one of the most transformative proposals in the City's recent history.

We support improving Penn Station. But this is not a comprehensive plan: there is no complete explanation of the funding; no specifics on the transit component, other than vague promises; no broad public outreach; and no discussion of the thoughtful alternatives that have been proposed. In March, you and your colleagues asked a series of questions that touch on these issues. We would like to see real answers.

The State's plan is bad for New York. Former Port Authority Executive Director Chris Ward said it best in a recent Crain's New York column: "Though the existing Penn Station is universally reviled, the new redevelopment vision really is a massive real estate play in search of a transit program." Ward asked: "What are the real transit priorities? Do we need this amount of density to even fund the project? ... And, finally, is this the City we will want to live in?"

This plan is bad for taxpayers. Because of a segmented process, there have been scant details about how funds will be generated, and how they will be spent to benefit New Yorkers. It doesn't call for an increase in train capacity. So far, we've heard that the budget is \$7 billion for new skylights and signage, and a substantial payment to Madison Square Garden. The role of federal funding needs to be clarified. The reliance on a single developer seems shortsighted. MSG's special permit will expire next year. The Garden's future should be clarified before any plan is finalized.

The City's own Independent Budget Office reported that there are serious questions about the financial viability of the plan, and with so few financial details, the plan is all but impossible to analyze. The IBO said that without more data on projected costs and revenues it is impossible to know whether the revenues will cover the debt service. They also criticized the lack of a backup plan if revenue does fall short.

In comparison, the 2017 East Midtown rezoning offered specifics on how funds would be generated and exact metrics between additional FAR and 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 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 can be adapted to address it. Further, in the midst of a housing crisis, proposing some 1,800 apartments out of 18 million square feet is absurd.

This plan forgets our history. We are dismayed to see the widely discredited policy of urban renewal as its centerpiece. The complete proposal, including areas under separate agency purview, such as block 780, calls for the demolition of dozens of historic buildings. Some are eligible for listing on the National Register of Historic Places. (Images are attached.) 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.

In addition, the pre-emptive demolition of the landmark Hotel Pennsylvania might threaten federal funding if it is violating the anticipatory demolition provisions of the National Historic Preservation Act.

This plan is profoundly anti-urban. 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 residences, activities and businesses that employ 8,300 people. The renderings for the new public spaces present an anodyne vision that could literally be anywhere in the world.

This plan is bad for the environment. 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 many years to reach carbon neutrality. It will disrupt this neighborhood for decades.

This plan is bad for New Yorkers. The opaque, segmented process around this proposal has left out the 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.

There has been virtually no public input for a plan that intends to entirely transform a section of the City. A series of stakeholder meetings was private. There was one hearing open to the public, but it had a narrow scope, only considering the land use changes, with no participation from any transit agencies.

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. That is a better approach for the area around Penn Station.

This neighborhood is not a blank slate. It is the home to businesses and apartments and history that will be erased. There will be a sizeable financial cost to relocate the people and demolish the buildings, and an intangible cost when an irreplaceable community is destroyed.

We believe the State's plan is deeply flawed and should be halted. At the very least, New Yorkers deserve to understand the entirety of what is being proposed. This is a once-in-a-lifetime chance to improve Penn Station, but the many questions that we have all raised need to be answered first.

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

BUILDINGS ELIGIBLE FOR LISTING ON THE NATIONAL REGISTER OF HISTORIC PLACES THAT WILL BE DEMOLISHED



Penn Station Services Building
McKim, Mead & White, 1908
242 West 31st Street



Hotel Pennsylvania **Already being demolished**
McKim, Mead & White, 1919
401 7th Avenue



Stewart Hotel
Murgatroyd & Ogden with George B. Post & Sons, 1929
371-377 7th Avenue



St. John the Baptist Roman Catholic Church
Napoleon LeBrun, 1872
207-215 West 30th Street



St. John the Baptist Roman Catholic Church
Napoleon LeBrun, 1872
207-215 West 30th Street



St. John the Baptist Roman Catholic Church Rectory
Napoleon LeBrun, 1872
207-215 West 30th Street



Farimont Building
J.M. Heatherton, 1923
239-241 West 30th Street



Penn Terminal Building
Sommerfeld & Steckler, 1920
370 7th Avenue