CITY PLANNING COMMISSION
CITY OF NEW YORK

OFFICE OF THE CHAIR

January 27, 2022

Hope Knight, President and CEO-designate
Empire State Development Corporation
633 Third Avenue, 37th Floor
New York, NY 10017

**RE: Comments on the Pennsylvania Station Area Civic and Land Use Improvement Project**

Dear Ms. Knight,

The City Planning Commission (the "Commission") has reviewed the General Project Plan (the "GPP") for the Pennsylvania Station Area Civic and Land Use Improvement Project issued by the New York State Development Corporation d/b/a Empire State Development ("ESD"). The GPP includes the original version released on February 18, 2021 and presented by ESD at a public hearing on July 20, 2021 and is reflected in the Draft Environmental Impact Statement ("DEIS"). The GPP also includes a proposed revision that was presented by ESD at a December 8, 2021, public hearing that reflects some of the comments from the Community Advisory Committee Working Group ("CACWG") convened by the ESD after the initial GPP was released. Both versions of the GPP would be considered by the ESD Board of Directors. The goal of the GPP is to create a world-class hub of transit-oriented development in the area around Penn Station that will integrate the recently opened Moynihan Train Hall, the ongoing renovations to Penn Station, and the long-anticipated Hudson Tunnel Project, with the potential new train station one block to the south of Penn Station that would accommodate up to nine new tracks and five platforms. The project would result in the development of 10 new buildings on 8 sites around Penn Station, comprising 18.2 to 19.6 million gross square feet, primarily in new office space. The buildings would incorporate new on-site entrances and connections to the transit and pedestrian network. Development facilitated by the GPP is expected to generate revenue streams to support the reconstruction of Penn Station, its potential southward expansion, and other public realm and transit improvements.

The GPP is subject to Commission review pursuant to the provisions of Subdivision 3 of Section 16 of the New York State Urban Development Corporation, which provides that a planning board or commission may recommend approval, disapproval, or modification of a general project plan, whenever such plan requires the override of local law or regulation for implementation. The GPP proposes an override of the New York City Zoning Resolution and other local law with respect to floor area, daylight evaluation, height, setback, major entrance location, pedestrian circulation space, retail continuity, sidewalk widening, signage, street wall continuity, and tower regulations.

Anita Laremont, Chair
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The Commission supports the overarching vision of ESD's GPP: to create a modernized, transit-oriented commercial district centered around the improvement of New York's Penn Station rail terminal and its expansion to the block south of the existing station. This improved and new below-grade transit infrastructure will enhance rail capacity and intermodal connections at the nation's busiest transportation hub. These improved transit connections are vital to moving local and regional commuters into New York City's central business district and will support economic development and job growth in the region by facilitating new commercial office development within the immediate project area. The Commission supports increasing density at this transit-rich, central business district location provided that such high density development is complemented and supported by commensurate transit and public realm improvements. The modernized Penn Station and the proposed new transit facilities should establish a proud civic identity as befits this primary gateway into the City.

The Commission supports the goals of the GPP and is excited to correct historic development and shortsighted design decisions of the past. However, there continue to be unanswered questions including but not limited to the financing of this ambitious GPP. According to ESD, the estimated cost of all the Penn Station related projects (Penn GPP, the Penn Station Reconstruction, and the Hudson Tunnel Project) is $30 - $40 Billion which would be divided between the Federal government (50%), New York (25%) and New Jersey (25%). While there have been some very preliminary discussions, the structure and terms of the GPP financing has significant economic implications and impacts on the City. The Commission urges ESD to address the financing for the GPP: it is a topic that must be concretely resolved prior to affirming the GPP.

The Commission acknowledges that after the first public hearing in June of 2021, the ESD team regrouped and formed the CACWG which resulted in a number of changes to the original GPP that are now included in the improved revised proposal. Specifically, the improvements include a new focus on the public realm with the creation of a Penn Station Area Public Realm Task Force and a Public Realm Fund. This is important because of the significant regional infrastructure and development projects underway within West Midtown – involving a variety of private, state, and regional actors – that are rapidly transforming a large area of the City. To achieve the goals of the GPP, a carefully considered planning approach is needed that pays attention to density and building form, as well as transit and public realm improvements. The Commission, in discussion with City Planning staff, puts forth the following assessment and recommendations to further refine and modify the GPP.

**Transit**

The GPP should provide much needed transit improvements to the area. The existing Penn Station transportation system provides connections from New Jersey Transit, Amtrak, and Long Island Railroad, to the City's IND Eighth Avenue (A, C, E) subway line and the IRT Seventh Avenue (1, 2, 3) line. The IND 6th Avenue (B, D, F, V) line, the BMT Broadway (N, Q, R, W) line and PATH are located one block to the east in Herald Square and Greeley Square. Many of these existing subway station platforms and stairways are already at or near capacity during peak hour volumes. The proposed development scenario of increased commercial office space will add more people and create more impacts in an already crowded network. The proposed transit improvements should alleviate congestion, add capacity, and create direct connections where appropriate.

1. **Penn-Greeley Passageway**
   The proposed Penn-Greeley Passageway is a new east-west connector from the Seventh Avenue IRT into the 6th Avenue and Broadway Subway lines and PATH. This is a critical passageway as the majority of users leaving Penn Station travel north and east and additional development will

increase ridership on the Seventh and Eighth Avenue subway lines. Therefore, it is vital to create strong pedestrian connections – both above and below ground – between Penn Station and Herald and Greeley Squares. There are two proposals under consideration: re-establish the Gimbels passage; and, build an entirely new below-grade passageway under Site 7 and Site 8. The design and location of the passageway are unresolved but the Commission notes that if the Gimbels passage is chosen, it would need a complete redesign and overhaul from its substandard condition.

2. **Eastern Concourse**
   The proposed Eastern Concourse is an important below grade connector that would be a direct passageway from Penn Station, the new platforms, across Seventh Avenue to the eastern end of Seventh Avenue, moving northward below grade through development sites up to 34th Street. This would greatly improve commuter movements to the north and east with a direct below grade connection. The Eastern Concourse would connect to the new Penn-Greeley Passageway.

3. **Penn Station**
   Simultaneous to the GPP, the MTA, Amtrak, and New Jersey transit are undertaking a separate project to transform Penn Station and create a Penn Station Master Plan. This project should provide for significant improvements to the existing Penn Station environment and improved transit connections to subways and rail. However, those discussions are not public, and it is not clear to the Commission how the Master Plan is integrating to the GPP.

4. **Intermodal Connections**
   Further coordination is required to ensure that ample space and legibility are ensured that strengthen connections between station entrances and other modes such as buses, taxis, and bicycles.

**Public Realm**

Our understanding of the public realm has evolved over the decades and is now generally understood as the collective backdrop to how the City is understood and experienced. Open space is an important, but limited resource in an already high-density area, and with further increases to density being proposed, will become even more constrained. The pedestrian experience of these spaces is critical, with enhancements that include high-quality design, amenities, and long overdue accessibility upgrades. Furthermore, improvements to transit, streets, open space, and sidewalks that accommodate greater numbers of people and allow them to circulate more efficiently and safely through the district are all the more significant as we contemplate increased density in the vicinity and plan for a post-pandemic City. Development should respond to the unique context of the Penn area by promoting appropriate density, uses, bulk, and design; contribute to a varied skyline; and respond to the surrounding density and zoning context. Bulk controls and building design should work together in shaping the public and pedestrian experience. The Commission believes that the new terminal should be a facility of enduring quality and superior design that inspires a sense of civic pride in the new transportation station. The GPP should also identify public realm improvements that optimize place and movement by improving and creating new open spaces, walking routes, and pedestrian amenities. The Commission notes that skybridges that cross streets or public open spaces are generally contrary to the goal of creating a vibrant and active ground level pedestrian environment and should be avoided.

1. **Herald Square and Greeley Square**
   Connectivity to the existing Penn Station and expanded trainshed should meet the needs of commuters and office workers within and beyond the GPP area who work throughout Manhattan,

predominantly traveling north and east into the central business district. The proposed GPP presents a vital opportunity to directly connect Penn Station to the Herald Square transit hub.

The Commission stresses that transit and public realm improvements should be expanded to include Herald Square, Greeley Square and Broadway. There is intense latent demand for public space in the area as a result of previous expansions. Improvements along Broadway will provide more space for improved station access, greatly enhance public space for the thousands of people working and shopping in the area and, create an iconic gateway to the new train station on Site 3 (Block 780). The Commission reiterates that construction of these vibrant and energetic plaza spaces as part this project are vital to creating a livable district that will attract both visitors and economic investment.

2. **Sidewalk Improvements**
In general, sidewalk improvements should extend from 30th Street to 36th Street, to encompass all of the entrances and exits to the improved and expanded Penn Station. Existing sidewalks are already at or over capacity so expanding and improving pedestrian infrastructure is critical to maintaining safety and quality of life in the growing district. Sidewalks should be a minimum of 30 feet wide along avenues and 20 feet wide along crosstown streets. The program plan should specify whether sidewalk widening will be implemented through building setbacks or extending into the street.

Seventh Avenue is a critical corridor within the proposed project area – with signature station entrances located at 33rd Street and 32nd Street. While the initial GPP plan from ESD showed the towers on Site 2 rising at the avenues, with a large mid-block open space, their proposed alternative plan shows a slightly smaller mid-block open space on Site 2 in exchange for a greater setback on Seventh Avenue and a significant avenue-facing transit entrance. The Commission strongly supports this revised approach, as it reinforces Seventh Avenue as the 'front door' to Penn Station – not only taking cues from the existing station by adding to the two entrances already along this corridor, but also orienting the station and open space in the direction of commuters, north and east from the station.

3. **Shared Streets**
Shared Street designs allow for flexible time of day management to accommodate peaks in pedestrian, cyclist, and delivery activity, while maintaining a high-quality experience for people as they move through the district. While the Commission supports this approach in concept, there remains many outstanding questions regarding how these streets would be managed and function in practice – especially given the significant competing needs of service and loading for the district withing these highly constrained rights-of-way and the existing congestion from un/loading and truck movements in and around Penn Station.

4. **Bike Lanes**
The Commission believes it is essential that the design of streets in the City's core incorporate protected bicycle lanes and the City appreciates the inclusion of such lanes on Seventh Avenue and Eighth Avenue, as well as 31st Street. The build-out of the protected bicycle lane on Ninth Avenue should be added. The usefulness of these lanes will be greatly increased by extending the network beyond the few blocks of the project area, and this should be accommodated to the extent possible. Grade-separated protected bicycle lanes are needed along these corridors to ensure safe space for bicycling apart from heavy vehicular volumes. These lanes would complement the growing bicycle network in Midtown, which sees more than 12,500 Citi Bike trips daily and where the bicycle commuting mode share is double that in the rest of the City.

5. **Curb Management: Loading and Bike Parking**
   To the maximum extent feasible, loading should be accommodated off-street. On-street loading should be managed through creative street design and curb regulations in order to minimize impacts on safety and mobility. Designs should also strongly encourage off-hour deliveries to boost efficiency of streets and loading in the district. Additionally, the proposal to create shared streets at multiple locations places additional importance on creating viable off-street loading and truck management solutions. Street design should also incorporate opportunities for bike parking to encourage and accommodate multi-modal trips. High-capacity bike parking and storage for both private bikes and shared bikes should be required within buildings and interior public spaces, outside of the right of way, and planned to mitigate overcrowding on subways that are used for access and egress from Penn Station to other areas in Midtown and adjacent neighborhoods.

6. **Open Space**
   The GPP should create significant and signature open spaces in the area to support the substantial addition of density and to serve neighboring communities, workers, and visitors by establishing a network of spaces that is responsive to, and that can help facilitate the movement of commuters in the area. This is an important opportunity to create significant public spaces that will encourage a balance of users and integrate the needs of residents, commuters, pedestrians, bicyclists, and make the streets safe for everyone. While the proposed GPP outlines the addition of eight acres of open space within the project area, the Commission would like to point out that the vast majority of this area is comprised of sidewalk widenings, with essentially only the mid-block open space on Site 2 (Block 780) amounting to a significant open space in its common understanding. The GPP should identify further public realm improvements within development sites themselves that optimize place and movement by improving circulation and the pedestrian environment.

7. **Signage**
   A carefully considered signage approach is needed that is responsive to density and building form in shaping the unique character of different corridors within the district. There are multiple transit systems in the area - MTA, Amtrak, NJT and PATH - and all related transit signage should be clear and easily distinguishable from commercial signage.

   The Commission believes that the existing Special Penn District sign regulations do not reflect the planning objectives as they contribute to visual clutter, with transit signs being indistinguishable from commercial signs and the presence of overly large and often free-standing signs that are not appropriately integrated into buildings.

8. **Sustainability, Resiliency, & Equity**
   While the GPP does includes goals that will satisfy relevant regulations and laws – in recognition of the high-profile nature of this project, the Commission would urge ESD to use this as an opportunity to strive to exceed current rules and regulations, innovate, and lead the way by example in securing the City's future against the most pressing challenges of today and tomorrow.

The Commission supports the goals of the GPP and, as previously stated, is pleased to see efforts to plan and design a fittingly significant district for Penn Station and its environs. However, the Commission cannot recommend its full support and approval for the GPP at this current stage of the plan. There continue to be unanswered questions related to the financing, transit improvements, and public realm improvements that must be addressed in a modified GPP. The Commission encourages the State, the City and all of the other stakeholders, to continue to work on the development of the GPP.

The Department and the City looks forward to working with ESD in a coordinated planning process and to ensuring that the proposed transit and public realm improvements are commensurate with the amount of density ESD is seeking across the GPP area. The GPP will facilitate a vital transportation infrastructure project that aids the City's and region's economic recovery, bring a new, revitalized and expanded transit center to the center of New York City, and provide essential improvements to transit and the pedestrian realm. We remain ready to collaborate with the ESD on the continued refinement of the proposal.

Sincerely,

Anita Laremont

cc: E. Hsu-Chen, S. Amron, E. Botsford, S. Johnson, D. DeCerbo