



Testimony of the Municipal Art Society  
Before the Empire State Development Corporation  
By Lisa Kersavage, Director of Advocacy and Policy  
Regarding Moynihan/Penn Station Redevelopment Draft Scope  
December 6, 2007

The Municipal Art Society of New York is a private, non-profit membership organization whose mission is to promote a more livable city. Since 1893, the Society has worked to advocate excellence in urban design and planning, contemporary architecture, historic preservation and public art.

My name is Lisa Kersavage, speaking on behalf of the Municipal Art Society. We are pleased to offer comments on the draft scope of the Moynihan/Penn Station Redevelopment Draft Scope. We believe the creation of a new Moynihan Station, East and West, is one of the most critically important civic projects in New York City today.

The Municipal Art Society has a long-standing interest in this important project. In the late 1990s, Senator Moynihan asked us to help encourage the notion that New York should once again have a grand train station and intermodal transportation portal worthy of a great city. We produced a master plan at his request and helped jump-start the project. We have been advocating for more than a decade that his vision must be fulfilled. Moving Madison Square Garden off the Penn Station site provides us an opportunity to build something greater than Senator Moynihan could have envisioned, and we fully support that aspect of the project. However, to ensure we get the great gateway to New York that he envisioned, we must have careful and critical oversight by the State. In this public-private partnership, the state needs to be the guardian of the public's interest and also actively engage the public in the process.

Our comments today will focus on broad themes about the draft scope; we will submit detailed written comments separately.

### **Lack of Plans**

One fundamental and overarching problem we have in analyzing the scope is that the document is not accompanied by a detailed general project plan or conceptual renderings. While we appreciate that plans developed by the Moynihan Station Development Corporation and the Venture are not final, the lack of conceptual plans accompanying the scope makes engaging the public in a meaningful way challenging at best. MAS conducted a poll over the summer to gauge the interest and knowledge about the new Moynihan Station. Overall we found that there was a general lack of knowledge about the project, although those who were informed were generally supportive. That said, one of our most striking responses was that 92 percent of those polled

believe the public should have a chance to see the renovation plans before they are endorsed by any elected officials. We urge you to release those plans now, so the public can have a greater understanding of the project. The public also ought to be engaged in determining the factors that will dictate the design and functionality of the improved Moynihan East station as required by the City Planning Commission's Special Permit.

### **Allowing Room for a Great New Station to Rise**

The draft scope outlines two alternatives for the distribution of bulk, and MAS supports the "Moynihan Station Subdistrict" alternative. It is critical to keep excess bulk off the Moynihan East block, in order to ensure adequate space for the train station and to limit major train disruptions during construction. MAS is deeply concerned that the amount of retail contemplated for the Moynihan East block is excessive and will occupy such a large area that it will not allow for space to fulfill the 14 design principles set forth in the Proposed Development Program. The scope anticipates 1.1 million square feet of retail to be constructed on the 7<sup>th</sup> to 8<sup>th</sup> Avenue block. That's an amount 9 times greater than the square footage of retail at Grand Central Terminal and slightly larger than the square footage of Madison Square Garden itself. As an alternative, the scope ought to study having substantially less retail square footage on the Moynihan East site. To that end, there are two conceivable alternatives; allowing the transfer of more retail to the subdistrict, or our preferred option of finding an alternate financing mechanism from the state or federal government that would negate the purported financial need to transfer potentially damaging amounts of development rights on the train station site.

### **Historic Preservation**

The Farley Post Office was designed by McKim, Mead & White as New York's premier general post office. It is a landmark of the people and its historic and architectural integrity must be safeguarded. We strongly believe that the project ought to be renovated in a way that makes it eligible to receive federal historic preservation tax credits. Not only would that increase federal funding to the project, it would streamline other historic preservation review processes, including the Section 106 and 4f reviews required under NEPA. While outside of the environmental review process, we believe the project must also go through review by the City Landmarks Preservation Commission, as the original Moynihan Station project did in the late 1990's.

The Farley Post Office is intimately tied to the culture of New York. The post office's use of the historic retail lobby contributes to the historic and cultural significance of the landmark. We believe the loss of that use as a post office would be considered a significant adverse impact to the building and we therefore fully support the alternative to study the retention of the retail functions and urge that the post office retail functions be made part of the General Project Plan.

MAS has conducted a quick windshield survey of the known historic resources in the Moynihan Station subdistrict and found it contains more than 40 historic resources, including a portion of the New York City designated Madison Square North Historic District. It is critical that the scope of work include the identification of all of the subdistrict's known and potential historic resources and that the study not be limited to only those resources that could be directly impacted. That will require a survey of the entire subdistrict to identify all potential historic buildings and sites. We concur with the draft scope's determination that the Area of Potential Effects for Section 106 review will include the entire Moynihan Station Subdistrict.

While designation of any of the resources by the city's Landmarks Preservation Commission is not formally part of the environmental review process, we urge the city to designate eligible

buildings and districts prior to approval of the rezoning, including the subdistrict's one National Historic Landmark, Macy's. In order to ease potential development pressure on city-regulated historic districts, the boundaries of the subdistrict ought to be modified so as not include the Madison Avenue North Historic District.

### **A Historic Opportunity to Create an East/West Transportation Link**

The Hudson Yards Rezoning, Hudson Yards East and the proposed Moynihan Station Subdistrict will create nearly 55 million square feet of potential development rights between Sixth Avenue and the river – an amount of square footage larger than downtown Seattle. There are currently no transportation systems to connect Penn Station to the new city that will rise to the east. While the number 7 line expansion will offer some relief, it offers no connection to more than half a million people a day who travel through Penn Station. This is a historic opportunity for the city and state to plan for a significant east-west transportation system. We urge the lead agency to study as an alternative the feasibility and the environmental and economic benefits of a surface or subsurface public transportation system between Herald Square and the Hudson River's ferry terminal. Furthermore, an underground pedestrian linkage should be studied that would connect the Herald Square subway complex to the Moynihan/Penn station complex. A spacious new east-west concourse should be centered midblock between 33rd Street and 32<sup>nd</sup> Street.

### **The Impact of Signage**

Finally, the scope does not mention the study of signage, in either the subdistrict or on the stations. It is critical that the any signage allowances being envisioned in either the subdistrict or on the stations be analyzed for its impact on the visual and historic resources and neighborhood character.

A new Moynihan Station will serve as a beautiful new gateway for the city, a catalyst to development on the West Side, and an unprecedented opportunity to create a new east/west transit connection. However, public projects need careful planning and strong public oversight. All New Yorkers have a stake in this public project to build Moynihan Station and they ought to be actively engaged in this process.