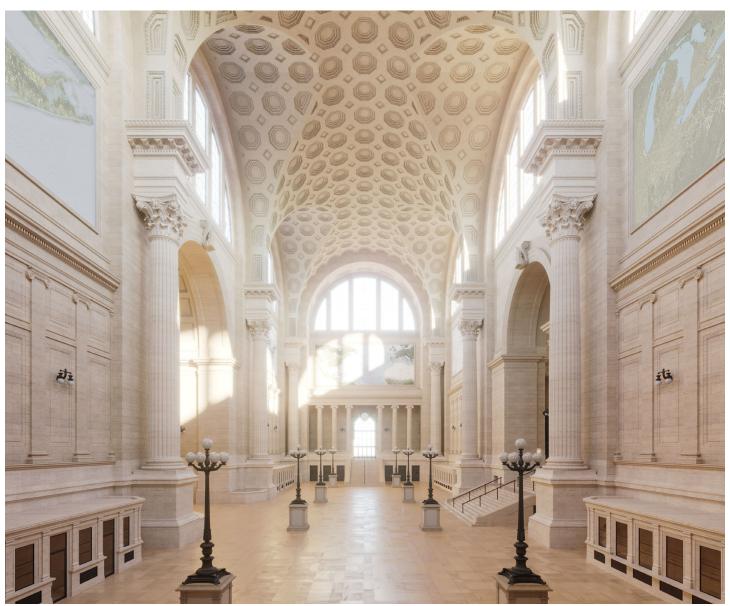
ReThinkNYC Requests that ReThinkNYC Proposals be Treated as Alternatives to be Studied

ReThinkNYC • New York, NY • August, 20 2020



Reimagined Penn Station's Main Hall. Digital Rendering by NOVA Concepts.

1. Introduction: ReThinkNYC Requests that ReThinkNYC Proposals be Treated as Alternatives to be Studied



RethinkNYC submits the following supplemental statement and proposals to their July 20, 2020 preliminary written and verbal submissions which were made in response to the Empire State Development Corps Draft Scope of Work ("DSOW") and request for Public Comment. RethinkNYC asks that this supplementary submission, which incorporates and adds to the prior submissions (with any changes noted), be read as a unified document. RethinkNYC requests that the proposals submitted today be considered as an "alternative(s) to be studied" as set forth on page 53 of the DSOW.

While RethinkNYC's more specific criticism's are set forth immediately below, RethinkNYC's overarching criticism and reason for sponsoring alternatives is that the proposed Empire State Complex fails to sufficiently unlock the potential that a modernized Penn Station and transit network would have on the economy, the region and nation's ecology, aesthetics, fair housing and accessability to the job market, among many other advantages. While the DSOW acknowledges other infrastructure projects — Gateway, Sunnyside Yards and the Port Authority Bus Terminal — it does not coordinate or harmonize these proposals in a way that maximizes their impacts for the region. New York has many challenges, particularly as we progress through the COVID crisis, and Penn Station and its environs cannot solve all of them. However, we believe that the proposals we propose for Penn Station—a unified regional transit network and a rebuilt original Penn Station— represent a once in a century opportunity to 1.) reduce transit congestion, 2.) expand the regions core and revitalize satellite cities and locations, 3.) improve access to the workplace and 4.) cap it off by adaptively reusing an entire neighborhood with the return of one of history's great buildings to its rightful location in Manhattan.

Link to ReThinkNYC website: http://www.rethinknyc.org/rethinkpenn/

Link to online pdf version of ReThinkNYC's plan for Penn Station: https://issuu.com/rethinkstudio/docs/2017-09-11_final_content__cover_w



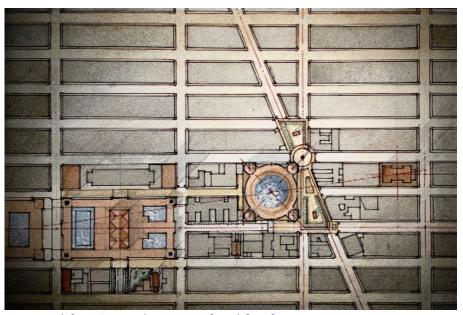
Three Madison Square Garden Proposed Locations. Image by ReThinkNYC.

ReThinkNYC's more specific criticism of the DSOW continues to principally be as follows:

- 1. First, the DSOW does not address the need to end Penn Station's utilization as a terminus as opposed to a throughstation. This is problematic because it forgoes benefits in train and passenger capacity that through-running would yield. New York's competitors, including London, Paris, Tokyo, Berlin, and Philadelphia, have all adopted throughrunning as a template for commuter rail operations. The failure to convert Penn Station from a terminus into a through-running station is a missed opportunity to address the root issue that affects Penn Station's operability.
- 2. Second, the DSOW also addresses as many as eight real estate parcels for potential land use development but leaves Madison Square Garden in place. This is problematic because leaving Madison Square Garden in its place will decrease the area's land use development potential. This will condemn whatever comes from the DSOW to a fraction of the potential benefit of moving the Garden, maximizing Penn Station's passenger capacity, designing a station worthy of the nation, region, city and site. There are numerous better sites for the 5th iteration of Madison Square Garden, including 1) Herald Square and Broadway, 34th to 32st; 2.) Dyer Avenue and 38th Street, and 3) Above the ramps in and the area of the current Port Authority Bus Terminal. These three sites differ slighlty from our prior submission.
- 3. We acknowledge that various zoning variances and creative value recapture strategies will be needed to fund transit and other improvements. We recommend that zoning variances, "upzoning" be limited and that Tax Increment Financing (TIF) be more greatly utilized to fund this project and to help maintain the positive characteristics of the neighborhood through adaptive reuse. We recommend that the potential parcels used to fund these improvements be expanded beyond the area presently proposed. We ask that the historic character of much of the neighborhood be preserved while certain sites are developed and upzoned in limited circumstances. Specifically, on the south side of 31st Street the mid-block parking garage should be removed in favor of a through block park, the historic church on the East side of this park should be preserved as should the facades of the original Penn Station Power Station to the west of the proposed park. The Pennsylvania Hotel and buildings immediately

south should be preserved or adaptively reused. So, too, with the East Side of 6th Avenue and/or Broadway between 35th Street and 31st Street. These recommendations are necessary in order to retain some of what is best of the neighborhood's character. Our Madison Square Garden site facing Broadway would now look across a vintage 6th Avenue vista which would frame the Empire State building. Many other underutilized sites could utilize Tax Increment Financing to fund a revitalized neighborhood including a new Penn Station and Madison Square Garden. These value recaptures and other strategies will retain an important vestige of New York's iconic physical character and would be a tremendous boon to the local and regional economy.

To summarize: Preserving Penn Station's operation as a terminus and insisting on the continued presence of Madison Square Garden over the station will compromise the city's quality of life, perhaps for generations. It will also forgo a win-win situation for New York's economic, ecologic, and civic life. There are an abundance of solutions that would modernize the performance of the transit facilities in the vicinity while reaffirming the character and culture of the area.



1. Potential MSG Location. Image by Richard Cameron.





3. Port Authority Bus Terminal site's potential. Image by ReThinkNYC.

2. Converting Penn Station into a Through-Running Station



RethinkNYC has long advocated for Penn Station's conversion to a through-station with expanded regional hubs along the Northeast Corridor. Further, RethinkNYC's position is that Penn Station is more than an anchor tenant for the "cohesive transit oriented commercial district" referenced in the DSOW. Rather, it is the centerpiece of a once in-a-century opportunity to remove the dysfunction, congestion, and band-aid approaches that have plagued Penn Station for the past half century. RethinkNYC proposes to address the Penn Station dilemma in a truly transformative fashion well beyond its immediate Midtown location. Within ReThinkNYC's comprehensive infrastructure strategy is the proposed rebuilding of the original Penn Station. RethinkNYC has fully embraced the desirability of rebuilding the grandeur of the original Penn Station in Manhattan as the architectural design which will bring the greatest aesthetic and economic benefit to New York. In calling for Penn Station's conversion into a through-station, RethinkNYC advocates that trains returning after rush hour drop-offs no longer return empty to their stations of origin, thereby creating congestion, but continue to pick up and deliver passengers to points across the region. This would be accompanied by the creation of expanded or new transit hubs in Secaucus, NJ and Sunnyside, Queens, and the enhancement of underutilized rail lines (which require little if any cost via public condemnation).



Today, Penn Station operates as a terminal.

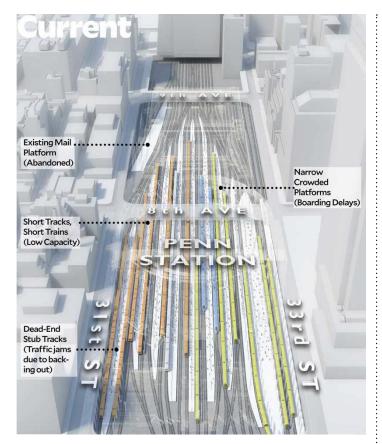


ReThinkNYC proposes that it is transformed into a through-running station.

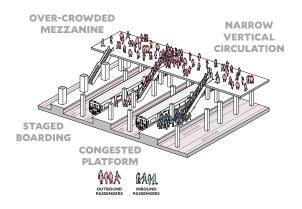


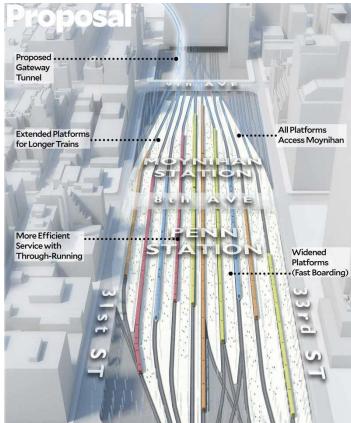
Regional Transit Hub at Sunnyside Yard. Image by ReThinkNYC.

Importantly, converting Penn Station to a through-station would require the train platforms to be widened which would greatly improve vertical circulation in the station. Wider platforms are made possible as through-running service requires fewer tracks than terminal stations do, since dwell times are brief when trains continue in their direction, rather than backing out.

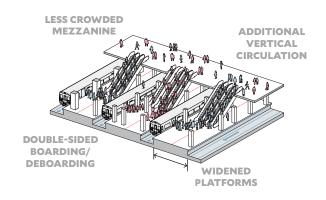


Penn Station's capacity is limited not by its number of tracks, but by the width of its platforms. Existing Penn Station's operations are a mess, with three railroads terminating and parking trains in a complex with narrow platforms unable to handle passenger loads.

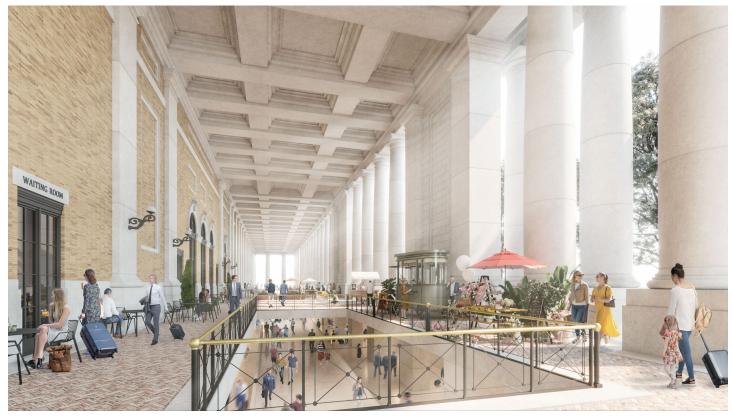




Our proposal solves the issue by widening platforms and connecting tracks to tunnels. The RUN Proposal, coordinate with Through-Running, allows for widening of the platforms, and connecting all terminating tracks into through-tunnels.



3. Rebuilding the Original Penn Station Harmonized with a Through-Running Circulation Plan



31st Street Colonnade & Ramp: A New Penn Station would not be a brick by brick reconstruction, but contain new spaces providing connective tissue between the neighborhood and the station. Please note the pedestrian ramps, a feature so successful at Grand Central Terminal *Renderings by NOVA Concepts*.

Rebuilding the original Penn Station is technically feasible, desirable, and economically practical. Reconstructions of classic buildings are commonplace in Europe. Dresden, Germany for instance rebuilt much of its historic core. This resulted not only in the restoration of civic beauty- it also stimulated massive economic growth by becoming a place where people want to live and visit. While not a reconstruction, the saving and reconfiguring of St. Pancras Station in London injected an old building with the functionality and connective program to work as London's hub to the continent. Modern construction techniques and computer-generated design make recreating the original station practical and cost effective. The Milford Granite Mill is still open. The original design will benefit from a modern circulation plan. An example of possible adaptation is reconfiguring the former carriageways on 31st and 33rd Streets into pedestrian arcades which will solve circulation problems and connect the station with the life of the neighborhood outside (pictured above).



Dresden, Germany



St. Pancras, London

4. Rebuilding the Original Penn Station:

Regional and National Signficance

Penn Station's historic demolition in 1963 was more than a crime against architecture. It was an assault on New York's civic sphere: one that signified the dominance of the private automobile over public transit, the isolated single family home in suburbia over well-connected, diverse communities, and the corporatization of public space over the grand civic spaces of the past. To summarize, the building's erasure came to embody everything that went wrong with post-World War II American city planning that helped cast into place the conditions that lead to the environmental and inequality crisis we presently face in society. What would it mean for the region and nation for it to be rebuilt? To experience a **360 degree view** of the main wating room: https://nova-vt.s3.amazonaws.com/PennStation/2.12.20_360/vtour/tour.html

Our country used to have a drive for constructing public grandeur with a goal of ennobling and placemaking. In the depths of the Great Depression, Franklin Roosevelt had the foresight to dedicate federal resources to the arts (The muralist Jules Guerin who worked on the station would later be a central artist of the WPA). A rebuilt station would become an internationally renowned landmark and its restoration would be an important symbol of New York's resilience and renewal after the COVID pandemic. The economic and aesthetic impact on the city and region would be unparalleled and incalculable. Even before the COVID crisis there was broad recognition that a new station is needed to meet current and projected transit needs.



Painting by Patricia Melvin

"The station, as he entered it, was murmurous with the immense and distant sound of time. Great slant beams of moted light fell ponderously athwart the station's floor, and the calm voice of time hovered along the walls and ceiling of that mighty room, distilled out of the voices and movements of the people who swarmed beneath. It had the murmur of a distant sea, the languorous lapse and flow of waters on a beach. It was elemental, detached, indifferent to the lives of men. They contributed to it as drops of rain contribute to a river that draws its flood and movement majestically from great depths, out of purple hills at evening.

"Few buildings are vast enough to hold the sound of time and now it seemed to George that there was a superb fitness in the fact that the one which held it better than all others should be a railroad station. For here as nowhere else on earth, men were brought together for a moment at the beginning or end of their innumerable journeys here one saw their greetings and farewells, here, in a single instant, one got the entire picture of human destiny. Men came and went, they passed and vanished, and all were moving through the moment of their lives to death, all made small tickings in the sound of time-but the voice of time remained aloof and unperturbed, a drowsy and eternal murmur below the immense and distant roof." Thomas Wolfe

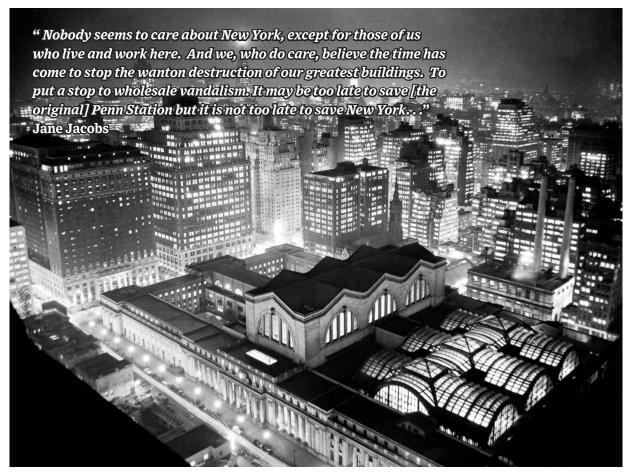


Re-imagining the Original Station: This proposal wouldn't be a brick-by-brick replication, but rather a functional update akin to the many aesthetically integral modernizations at Grand Central Terminal. *Rendering by NOVA Concepts*.



A Relocated and New Madison Square Garden at Herald Square. Image by Richard Cameron.

5. Historical Precedents, Pandemics, Infrastructure and Architecture: Past as Prologue



View of Penn Station from the Roof of New Yorker Hotel.

It is important to note that the present pandemic – as outlined by Michael Lewis in his WSJ opinion piece of June 6th, Pandemic as Urban Planner – has only added to the need to "rethink" Penn Station. Lewis alludes in his piece directly to rebuilding the original station and the place such 'rethinking' would have on this important bellwether for the very future and viability of cities.

The original Penn Station, as Lewis rightly points out, was in some respects the lineal descendant of Philadelphia's Waterworks and Fairmount Park, the Champs Elysée and the Arc de Triomphe in Paris and the Thames Embankment, all of which were created in the wake of public health crises. The original Penn Station was also a peer of Union Station in Washington D.C., Grand Central Terminal, and Denver's Union Station. These stations prove the continued vitality and positive aesthetic of this style of train station architecture. Recreating the original Penn Station would bring similar vitality to New York City and beyond. The recreation of the original Penn Station would also stand as evidence to the resilience of New Yorkers both in correcting the architectural crime of the century in the original station's destruction, and transforming our cityscape and region greatly for the better. Penn Station's reconstruction will come with modern affordances:

- passive heating & cooling
- energy efficiency standards
- 30 geothermal wells
- glass solar panels on the concourse level
- programmed space for social services where previously offices were held

6. The problematic state of Penn Station represents the region's divided governance, especially in regards to planning, transportation, and economic development. The ReThink NYC plan will remedy this state of affairs.

Even prior to the current pandemic, a "Marshall Plan" for New York and it's immediate surrounding area, such as what RethinkNYC proposes, was needed for the balkanized metropolitan region. Infrastructure spending, particularly on a more integrated transit network, will resurrect the economic damage caused by the virus and restore public trust in the viability of a dense urban and suburban region such as New York. The expansion of the region's economic core will make places like Newark, Elizabeth, Paterson, Long Island City and beyond all part of a well-connected whole, rather than a series of disconnected parts like today; a concept that we call the "Bigger Apple".

The ReThinkNYC plan would enable people living in Newark to work in Sunnyside and people living in Brooklyn to work in Paterson or Hackensack. Dan Doctoroff, Deputy Mayor for Mayor Bloomberg, in a New York Times op-ed piece, recently pointed to the five-borough approach adopted to bring the city back from 9/11. RethinkNYC's regional transit proposals are similar but with a multi-state palette and advocates for an empowered regional governance structure. Governor Cuomo's multi-state COVID response efforts show the benefits of such coordination.







Downtown Paterson, NJ

A new level of regional cooperation alongside integrative transit planning would open up neighborhoods to the growing economy, and create job-connected housing. This would integrate more communities economically and socially. To summarize, the DSOW does not take a regional approach to Penn Station's reimagination. This is because New York does not have the mechanisms in place today to do so. The region's fragmented governance makes creating plans between states and municipalities extremely difficult. ReThinkNYC believes that in order to maximize Penn Station's potential, a region wide approach is necessary that we hope to integrate into the Empire State Economic Development Corps strategy.

7. Economic Impact: The ReThinkNYC plan will make the Region more Attractive and Accessible to 21st Century Industries

Today, New York is stuck in a zero sum game between the forces of growth and maintaining a reasonable level of quality of life and cost of living for all. New York's unparalleled attractiveness for talent makes it an excellent place for healthcare facilities, knowledge companies, and educational institutions to locate. This desirability gives New York the opportunity to diversify its economy and insulate itself against future economic downturns. New York's rapid growth over the last two decades however has had its consequences. Due to New York's capacity limitations, the more new people move here, the harder it becomes for others to stay living here. The subway is full, Midtown has no more room for new construction, and neighborhoods with good access to transit have been gentrified. The choice between New York expanding economically and remaining a place for everyone to live however is a false one.

Strategic, region-wide transportation planning is the foundation to overcoming New York's capacity issues, taking full advantage of its present economic opportunities, and making the region the best place to be for all. The ReThinkNYC plan takes this approach. With its comprehensive infrastructure strategy, the ReThinkNYC plan will expand the menu of locations for companies to locate, whether it be in healthcare, tech or education. Increasing accessibility in cities like Newark, Sunnyside, Paterson, East New York, and Elizabeth will create wide-ranging jobs for all. The amount of jobs in these currently underserved areas of the region outside Manhattan will increase dramatically. Expanding New York's core beyond Manhattan will leapfrog its housing capacity, reduce the region's cost of living, and democratize its economic expansion.

Preserving Penn Station's usage as a terminal station will essentially maintain the status quo. It will double down on Midtown as the region's only central business district, make creating land use development outside of the traditional core extremely difficult, limit the region's growth potential, and do very little for local economies outside of Manhattan. With a new approach to the region's transit network, exponentially greater housing, office, and transit capacity can be achieved. This is what the ReThinkNYC plan offers.

8. Next Steps

RethinkNYC, as promised in its July 20th preliminary written and verbal statements, makes the following proposals supported by the data included in their submissions and linked information on Rethink websites. RethinkNYC advocates that these proposals can be funded by amending many plans presently in place for the region with a repurposed and more integrative approach. Rethink NYC favors TIF financing over zoning for dollars and accordingly asks for a more fulsome value recapture from the broader Midtown area in order to fund a rebuilt original Penn Station as a through-station, the relocation of Madison Square Garden, and the enhancement and unification of the regional commuter lines. RethinkNYC points out that these proposals will require less disruption to the cityscape and less need to resort to public condemnation than the DSOW. RethinkNYC's specific proposals include:

- 1. The Empire State Development Complex needs to be harmonized with the Gateway, Sunnyside Yards and Port Authority Bus Terminal initiatives such that Penn Station's conversion to a "through running" station, with greatly enhanced regional transit hubs and reutilized abandoned rail lines takes place; in order to inaugurate a fluid and unified commuter rail network for the New York Metropolitan Region.
- 2. Penn Station's conversion to a through station should be accompanied by the rebuilding of the original McKim Mead and White Station with a modernized circulation plan and transit technologies as part of an adaptive reuse of the 34th Street/Hudson Yards area.
- 3. As part of the adaptive reuse of the 34th Street/Hudson yards area, the following should be included: create a park mid-block south of the station on 31st Street, the moving of Madison Square Garden to 34th and Broadway to 32nd and Broadway (with two alternative sites listed in our plan), preserve numerous buildings and streetscapes (e.g. Pennsylvania Hotel and block south, East Side of 6th Avenue/Broadway between 34th to 31st Street, resurrection and expansion of parks at Herald and Greeley Square). While value re-capture, our favored approach and zoning changes, on a more limited basis, can happen, this development should be done in a way which sensitively and adaptively reuses the existing cityscape rather than razing historic structures to create a new Hudson Yards-like mall, a few blocks East.
- 4. A new governance model should emerge so that the public isn't left to respond to such infrastructure changes piecemeal and without adequate sensitivity to the true footprint of the region.
- 5. Affordable Housing, including middle income housing, and high quality homeless services should be part of the Penn Station vicinity.

9. Conclusion

The RethinkNYC infrastructure, governance, and economic proposals - anchored by its proposal to rebuild Penn Station and adaptively reuse the Station's Midtown neighborhood - represent a tremendous opportunity to unlock the New York region's full potential. With a more integrative approach, New York can correct what mars the region and soar beyond the COVID tragedy into a less congested, more sustainable, healthier, fairer and safer New York metropolitan region. Of equal importance, while allowing development to go forward RethinkNYC recommends we do so in a way that doesn't destroy New York City's "feel" and "identity" but, rather, adaptively reuses it(recreating some of it) in a way that will modernize and preserve our hertiage for this century and beyond.

Samuel Turvey

Chairperson RethinkNYC

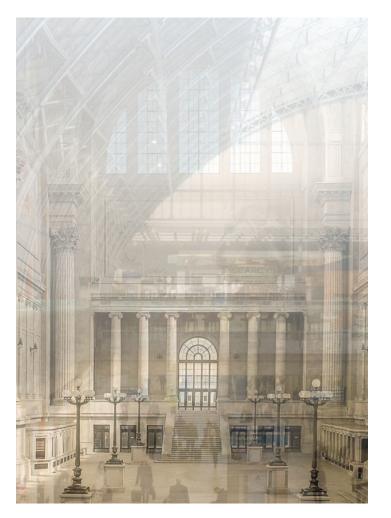


6:00 a.m. August 28th, 1963, Penn Station, New York City. *Photograph by Robert Parent*.

Coda

While not a reconstruction, the saving and reconfiguring of St. Pancras Station in London upgraded its functionality enabling it to serve effectively as London's gateway to the continent. The lower level, previously an after-thought, was converted into a concourse full of shopping and direct access to platforms above. The attached high-Victorian Midland Hotel, restored, has become a beloved icon of the city and a potent symbol of getting infrastructure and architecture right.

We believe a restored Penn Station and adaptive reuse of many of the architecturally significant buildings in its vicinity, including a revitalized Hotel Pennsylvania and a new Madison Square Garden moved (possibly) to Herald Square (with vistas of the Empire State Building beyond) would affirm and reinforce New York's unique urban identity while bestowing on the city a world-class unified regional rail network for the benefit of the city and the entire region. This is why we describe our proposals as a once-in-a-century opportunity to propel New York into a better future fully competitive with its international urban peers. The resilience we would show in correcting the "architectural crime of the century"-the destruction of the original Pennsylvania Station-would allow us to fully exploit the advantages of our existing comprehensive rail transportation network, while correcting its main disadvantage: its lack of connectivity between lines. This approach would boost public morale and give new hope that New York's best days, despite COVID and other challenges, lie ahead of it.



London's St. Pancras Train Shed juxtaposed over Penn Station's Main Waiting Room.

To paraphrase Jane Jacobs, we could not save the original Penn Station but we can save New York. We can do this, in part, by having the courage to rebuild an architectural masterpiece that should never have been destroyed and by letting logic, need and geography rather than political infighting and man-made jurisdictional limits define our future transit operations. If we get this right, we will not only save New York but will unlock the region's true potential in ways that will burnish the legacies of all who fought to make this happen for generations to come.