

December 6, 2007

STATEMENT OF THE NEW YORK LANDMARKS CONSERVANCY AT THE PUBLIC SCOPING MEETING HELD IN THE JAMES A. FARLEY BUILDING REGARDING THE PROPOSED DRAFT SCOPE OF WORK FOR THE PREPARATION OF A SUPPLEMENTAL ENVIRONMENTAL IMPACT STATEMENT FOR THE EXPANDED MOYNIHAN/PENN STATION REDEVELOPMENT PROJECT IN MIDTOWN MANHATTAN

Good evening. I am Roger Lang, speaking on behalf of the New York Landmarks Conservancy.

The Landmarks Conservancy is a private, independent, citywide, not-for-profit organization, founded in 1973. Our mission is to foster the preservation and revitalization of historic resources throughout New York. We have spoken out for the Moynihan Station project since its inception, when the late Senator Moynihan served on our Board of Directors.

The Landmarks Conservancy supports the expanded Moynihan/Penn Station Redevelopment Project. If done well, it will be a great boon to New Yorkers and a handsome civic gateway to our city for visitors arriving by rail.

We are pleased that the environmental review process has begun and that tonight, for the first time in years, the public can speak out about this proposal in an official forum. Yet there are scant details in this hefty scope of work which the public can comment upon, especially pertaining to our primary concern -- historic preservation.

On page 43, we are assured that the scope of work includes examination of "issues of use, historic features, and historic context, based upon project design information." But the entire document contains virtually no such "design information." Not one floor plan, section, elevation, or rendering. There is no way the consultants can evaluate impacts on historic resources from the information at hand. They will have to be given -- or assume -- more to do so. And there is no indication the public will see -- let alone have the opportunity to comment upon -- these in-house designs.

To be sure, creating functional train stations is of paramount importance. They must be achieved with the minimum environmental impact. That's good project planning and sound engineering. But it's no substitute for making policies in the public interest, creating an inspiring design, and ensuring that historic features are preserved.

This project aspires to greatness. It seeks to create an "iconic, monumental, and more efficient transportation gateway to and from New York City" which is "world-class." There would be "identifiable train halls, wider concourses, improved connections and grand entrances." The "historic Farley Complex" would

be preserved restored, and adapted to new uses, including a relocated Madison Square Garden. We applaud these goals.

But we have seen nothing to demonstrate that the developers or the Garden's owners have been required to help achieve these goals. On the contrary, it appears that private interests have prevailed over the public good in the design of both Moynihan East and West. The Garden has been especially clear in its demands. Here are a few examples:

Their preliminary designs for Farley show a glass-walled train hall, denuded of its historic brick walls and original trusses. It appears to be conceived as a mere lobby to the Garden arena.

Atop the western Annex of Farley, there is to be a large rooftop addition to accommodate the new arena. The scoping document says "The arena roof would be set back from the fourth floor cornice and would rise above the exterior walls of the main facade." Well, just how far would it be set back? How high would it rise? Of what materials is it to be built? How reflective or luminous will it be? These are the precise details necessary to determine if the proposal conforms to the standards used in an environmental and historic preservation review.

There are also unnecessary and inappropriate alterations proposed for the historic Post Office lobby. And proposals for large exterior signs whose locations and details remain under wraps.

These designs do not comply with historic preservation standards applicable to this project. This means the project may fail to gain federal Investment Tax Credit benefits totaling a quarter billion dollars. Such an outcome should be unacceptable to ESDC and the other project sponsors.

The present environmental review process is in stark contrast to the previous scoping documents promulgated by ESDC in 2003 and 2006. Those iterations of the project were rich in design detail, with inspiring renderings and photographs of models. It is unfortunate that this supplemental EIS should spring from such thin gruel when its predecessors gave us such a rich meal.

Some of the public policy decisions which are described in this scoping document are, in our view, are seriously flawed. For example, what is the public purpose behind consolidating or eliminating the United States Post Office from its historic quarters within Farley? What justifies what the scoping document terms on page 15, with rare candor, "a reasonable worst-case scenario for the project"? A compelling case can be made for keeping the USPS on board, as a matter of historical continuity, fairness, and in the interests of creating a development which demonstrably benefits the public. This is the Postal Service's flagship, well-used, open 24 hours a day – a cherished space which should be an interior landmark. If it's not broken, why does ESDC want to "fix" it?

The Landmarks Conservancy also joins with the Municipal Art Society in expressing concern for the historic resources in the various proposed receiving areas for the transfer of development rights from the Farley and

Penn Station sites. All should be carefully evaluated as a part of the forthcoming environmental review process.

Finally, the consultation with the New York City Landmarks Preservation Commission described on page 44 is insufficient. Farley is a City landmark. Any changes proposed for it should be submitted for the Commission's review and comment. This process should include a public presentation of the proposal, followed by an opportunity for the public to speak. This is the welcome, transparent approach taken by the Metropolitan Transportation Authority in its restoration and renovation of Grand Central Terminal. ESDC should do no less for this project.

In conclusion, The Landmarks Conservancy believes the scoping document lacks essential detail and may be based upon flawed public policy decisions. It can accomplish a cursory environmental review, but it will not achieve the lofty goals set forth in it for this civic undertaking. The process must be reconsidered to ensure that the public is well-informed and that the public interest comes first as the process continues.

In the interests of brevity, I will conclude here and offer other comments in a letter to be sent in within the next ten days.

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