



CITY OF NEW YORK

**MANHATTAN COMMUNITY BOARD FOUR**

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**JOHN WEIS**  
Chair

**ROBERT J. BENFATTO, JR., ESQ.**  
District Manager

May 11, 2010

Robin Stout  
President  
Moynihan Station Development Corporation  
633 Third Avenue, 36<sup>th</sup> Floor  
New York, NY 10017

**RE: Moynihan Station Civic and Land Use Improvement Project Draft Amended General Project Plan, Phase I, dated March 2010**

Dear Mr. Stout:

On the unanimous joint recommendation of its Chelsea Preservation and Planning, and Clinton/Hells Kitchen Land Use Committees, Manhattan Community Board No. 4 voted at its May 5, 2010 meeting to approve the following comments on the Moynihan Station Civic and Land Use Improvement Project Draft Amended General Project Plan, Phase I, dated March 2010. A preliminary version of these comments, approved by the Board's Executive Committee on April 26, 2010, were presented at the April 28, 2010 public hearing held by the Moynihan Station Development Corporation.

CB4 is a strong advocate of the development of Moynihan Station. We have long believed that the project has the potential to create significant community and city benefits, and we now believe that the current phased development plan offers the best opportunity to see the long-overdue Moynihan Station project completed. We are generally supportive of the General Project Plan and wish to thank MSDC for its leadership in bringing the project to this critical point.

The Moynihan Station Project includes the design, development, construction and operation of Moynihan Station in the James A. Farley Post Office Building on the superblock on the west side of Eighth Avenue between West 31<sup>st</sup> and 33<sup>rd</sup> Streets. The Farley Building was designed by the firm of McKim, Mead and White, the architects of the original Pennsylvania Station, and is widely considered to be an architectural gem. The project also includes off-site development on the western end of the block between West 33<sup>rd</sup> and 34<sup>th</sup> Streets on the east side of Eighth Avenue, the "Off Site Premises." The Empire State Development Corporation acquired the Farley Building, including its Western Annex, from the United States Postal Service in 2007. The USPS leases space

in the Farley Building from ESDC, including the beautiful main postal lobby above the monumental steps, and is expected to continue to do so.

Phase I is expected to cost approximately \$267 million and is fully funded through previously allocated Federal, State and New York City funds, and a recently-awarded \$83 million TIGER (Transportation Improvements Generating Economic Recovery) grant. In addition to MSDC, at the request of, and working with, the office of the Governor of New York, the Port Authority of New York & New Jersey is playing a leading role, bringing its funding and transportation infrastructure construction experience to the project.

Phase I of the Moynihan Station Project is focused on below-grade construction designed to improve transportation. Phase II will create an iconic, sky-lit train hall in the Farley Building and approximately 370,000 sq. ft. of Amtrak, public circulation and transit-oriented retail space, and in partnership with private developers, will develop approximately 750,000 sq. ft. of commercial space in the Western Annex, and build a 1,000,000 sq. ft. mixed use building on the “Off-Site Premises.”

MSDC has executed a Memorandum of Understanding with Amtrak and expects that once the train hall is completed Amtrak will move its operations from the existing Penn Station to the newly renovated Moynihan Station. In addition to providing Amtrak with its own station, the transfer of Amtrak operations to Moynihan Station will free up significant space in Penn Station and potentially relieve the congestion experienced by New Jersey Transit and Long Island Railroad passengers.

We applaud the phased structure of the project and are especially pleased that Phase I is focused on those aspects that will have the greatest impact on Moynihan Station’s transportation benefits. We support the proposed improvement to the West End Concourse, the 33<sup>rd</sup> Street Connector and the new vertical access points to the train platforms. All of these underground improvements will contribute to improved passenger circulation, comfort and safety, as well as to shortened train dwell times and increased train system capacity. We note that the proposed work does not include the lengthening of platforms one and two, a concern of some rail advocates. MSDC has said that nothing in Phase I would preclude future options for these platforms should the necessary funds be found. We also note a suggestion that lengthening, but not widening, the West End Concourse would improve passenger circulation. MSDC has agreed to review this suggestion.

In addition to the below grade construction noted above, Phase I also calls for the conversion of existing windows on either side of the Farley Building’s monumental steps to entrances and for the construction of an emergency ventilation system with vents to be positioned within the building’s moats.

Creating the proposed entrances involves the removal of the moat walls at the two street corners, the conversion of the three plain window openings of the building basement on either side of the monumental steps into entrances to passageways leading westward, and

revising the slope of the bases of the moats to provide access from the sidewalks to the newly created entrances.

These changes to the historic Farley Building raise three immediate issues:

- **The Entrances.** These should involve the minimum necessary removal or disturbance of historic fabric required for the conversion from windows, and the design should reflect the plainness of the historic openings.
- **Lighting and Signage.** Fixtures should be unobtrusive and harmonious with the building, and lighting should be consistent with other lighting on the façade. Signage should be the minimum required, and lettering should be derived from the existing lettering on the building, such as that of the famous inscription above the steps.
- **Moat Walls.** The original footprint of the property as defined by the moat walls should be indicated clearly in the newly created entrances. This might be done by marking the footprint of the moat walls in the surfaces of the new walkways with slabs cut from the granite of the moat walls.

The proposed emergency ventilation system will be comparable to the existing system for the existing Penn Station. That system operates twice a year on average and has vents flush with the sidewalk just to the east of Eighth Avenue on the north and south sides of Madison Square Garden. It also has two raised vents twelve feet in diameter and seven feet high just to the east of, and on the north and south sides of, Madison Square Garden. We have received verbal assurance that the vents for the emergency ventilation system will not be towers, but designs showing where the vents will be located and what their form will be are not available. We would have preferred to have more information on these points and ask to be included in future discussions on their locations and design.

Preliminary Phase II renderings show the moats covered. The western ends on both 31<sup>st</sup> and 33<sup>rd</sup> Streets are shown to be pedestrian walkways, with the underlying moats filled with mechanical equipment. It is likely that the vents will be in these areas, but they are not shown. The eastern ends are shown to be glass, allowing daylight to reach station retail areas below. It is not clear whether the glass areas will be part of the pedestrian passage way. We are concerned about the loss of the moats that have been a dramatic part of our community for so long and ask for a public discussion of their fate.

Finally, CB4 requests that Phase II of the Moynihan Station project be submitted to the city's ULURP review. ESDC intends to forego ULURP and override local law by invoking the Urban Development Corporation Act. We believe that ULURP is the best way to ensure transparency and to give the public the opportunity for substantive input into a major land use project. We appreciate the time constraints that made ULURP inadvisable for Phase I, but Phase II does not suffer from the same need for haste. In addition, Phase II will impact an historic building, will create significant land use issues

both on- and off-site, and will result in impacts on pedestrian, subway and vehicular traffic.

We remind you that both the ARC project and the Western Rail Yards passed through ULURP and emerged better projects because of the public discussion. We hope that Moynihan Station Development Corporation/Empire State Development Corporation will follow the informed lead of the Port Authority/New Jersey Transit and the Metropolitan Transportation Authority and agree to ULURP for Phase II of the Moynihan Station project. The project will have a dramatic impact on the immediate community and the city for generations to come. We believe strongly that the public review process afforded by ULURP is both necessary and appropriate.

Sincerely,



John Weis, Chair  
Chelsea Preservation and Planning



J. Lee Compton, Co-Chair  
Chelsea Preservation and Planning

[signed 5/11/10]

Corey Johnson, Co-Chair  
Chelsea Preservation and Planning



Elisa Gerontianos, Co-Chair  
Clinton/Hell's Kitchen Land Use



Sarah Desmond, Co-Chair  
Clinton/Hell's Kitchen Land Use

cc:

U.S. Senator Charles Schumer  
U.S. Senator Kirsten Gillibrand  
NYS Governor David Paterson  
Congressman Jerrold Nadler  
NYS Senator Thomas Duane  
NYS Assemblyman Richard Gottfried  
NYC Council Speaker Christine Quinn  
Manhattan Borough President Scott Stringer  
Andy Lynn, PANYNJ