

Outline of Testimony
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Draft EIS – East Midtown Rezoning
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My name is Ellen Imbimbo, a Vice Chair of Community Board 6 as well as of its Land Use and Waterfront Committee.

We appreciate the opportunity to comment here today on the Draft EIS and we look forward to working with the Department of City Planning and other agencies towards our common goal of enhancing the Grand Central area in its role as one of the epicenters of the commercial world.

We hope City Planning will reconsider the scope of the East Midtown Zoning proposal and conclude, as has the Regional Plan Association in its report “Building the Next New York: Recommendations for Large Scale Real Estate Projects,” that major redevelopment should “lead with public realm improvements” in planning for large scale developments. As has been stated by the Chair of Board 6, we believe the East Midtown Zoning proposal does not qualify as a true urban plan. It lacks specificity regarding named public realm projects, the costs associated with those projects, their prioritization, and the absence of guaranteed funding sources at levels necessary to ensure that the Grand Central area is able to not only renew itself with modern and larger buildings, but will be fully integrated and balanced regarding its full aims and their actualization.

The District Improvement Bonus appears to be the only revenue source for funding public realm projects. Two public realm projects identified are the Vanderbilt Avenue promenade, and the stairway (and other attendant circulation problems) at the Grand Central Subway station, the costs for which are not specified but which would likely be at either end of a cost spectrum from very expensive (the stairway) to less expensive (Vanderbilt Avenue). There is also no mention made of the solution if there should be a gap between funding needs – such as sidewalk widening – and the money gathered in the DIB fund. Construction in an area as densely developed as Grand Central will surely uncover infrastructure or other unforeseen hurdles which dramatically raise costs – particularly with the completion of the Second Avenue Subway and East Side Access bringing additional commuters, pedestrians and circulation problems to the area.

We have only to turn to the plan for Hudson Yards for some thoughts on how funding might be handled for public realm projects within an ambitious rezoning plan. Although the Hudson Yards area is not nearly as developed as East Midtown (but has its own engineering hurdles), the Hudson Yards plan benefited from a much longer lead time than that for East Midtown. We are hopeful that, if the study time for East Midtown zoning were to be extended, a funding study will be undertaken to answer questions about the identification, nature, scope, and cost of public realm projects and the source of funds which we believe should be assured before the implementation of the East Midtown Zoning Plan. The “Hudson Yards Demand and Development Report” by Cushman & Wakefield states: “Significant changes to City zoning to create new markets that would be competitive with Hudson Yards could potentially result in lower development than forecast.” The statement could also hold true for East Midtown and developments at the World Trade Center site, thereby lowering the availability of DIB funds for the Grand Central area.

In addition, the Hudson Yards Infrastructure Corporation states as one of its key goals ... “enhanced access to mass-transit, availability of large commercial sites, creation of new public open spaces and cultural amenities...” However, these goals are accompanied by tax-free bonds guaranteed by the City, PILOTs, Tax Equivalency Payments, and payments for additional air

rights pursuant to the District Improvement Fund Bonus.” ... “The DIF will be used by the City to help finance density-ameliorating infrastructure improvements in the Hudson Yards.” We hope that City Planning and the Final EIS will offer some insight into the omission of these guarantor mechanisms from the East Midtown zoning initiative.

If City Planning develops a more comprehensive urban plan, dedicated funding sources will ensure that the East Midtown Zoning plan will indeed result in a major enhancement of one of the pre-eminent locations for the iconic buildings which will surely follow.