

John Pettit West III
250 West 94 Street
New York, New York 10025
212-866-1246
john.west.iii@gmail.com

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East Midtown Rezoning -- Scope of Environmental Review

My name is John West. I am a member of Community Board Six; however, I am speaking today as an individual. This is in part because a formal position of the Board requires a resolution by the Board and, although we took the unusual course of holding committee meetings during July and August to accommodate the City's accelerated schedule, we have not been allowed adequate time to properly review the proposed scope before this meeting.

I will limit my comments to four issues. There is more detail in my written testimony, so I will only introduce the four items now.

Task 2. Land Use, Zoning, and Public Policy: Midtown Manhattan, particularly East Midtown, is considered the hub of the region's commercial districts. Thirty or 40 years of public policy have sought to spread the wealth of this economic engine to the city's other central business districts in order to bring jobs and economic development to parts of the city with sites and infrastructure to accommodate it. These areas are intricately interrelated. What happens in one area affects the other areas. A change in the City's policy for East Midtown deserves a detailed examination of what is likely to happen in the other commercial districts and the neighborhoods they support.

It has long been City policy to spread commercial office development from East Midtown to other parts of the city. During the Lindsay administration there were Mayor's Development Offices to encourage investment in places as diverse as Lower Manhattan, Downtown Brooklyn, and Jamaica, Queens. In 1982 the Special Midtown District was established explicitly to "achieve balanced growth by stabilizing the East Side Core while encouraging development in West Midtown." Subsequent rezonings in Long Island City, Downtown Brooklyn, Hudson Yards, and elsewhere have sought to advance this policy. The goal has been to distribute development over the city's several central business districts to make better use of existing infrastructure, to reduce congestion, and to promote economic development and job creation throughout the city.

The zoning proposal for East Midtown seems intended to reverse that policy.

Before making such a change it seems there ought to be a thorough market and economic study that relates the public investment in infrastructure, particularly transit, and the private investment in commercial real estate. There needs to be real justification for a reversal of the City's policy since before 1982. Ideally

such a study would also address the region's other business centers, such as Hoboken, Jersey City, Newark, White Plains, and Stanford.

In any event, the scope of the environmental analysis of the proposal needs to recognize the interrelations of the several commercial districts and the impacts of encouraging real estate development to again focus on East Midtown.

Task 11. Energy: An energy analysis of development in East Midtown differs from most places in that the development sites are already occupied by large buildings with significant embodied energy. An appropriate study would compare the life-cycle energy budget of renovating or enlarging an existing building with demolishing and replacing it.

The energy section of the proposed scope seems to anticipate an analysis based only on the energy required to operate buildings. It does not propose to address the energy required to demolish or construct buildings and does not mention the embodied energy of existing buildings.

There are two questions for which a life cycle energy analysis would be informative:

- Should public policy encourage the replacement of substantial existing buildings in East Midtown with new buildings?
- Should public policy encourage development in East Midtown or in other commercial districts?

Because sites in East Midtown tend to be occupied by large buildings, rather than being vacant or occupied by relatively small buildings, it would be important to compare the energy cost of renovating or even enlarging an existing building compared to replacing it.

A life cycle analysis would consider the embodied energy of the existing building, including the energy used to create, transport, and erect the old materials, the energy to demolish and dispose of the existing structure, and the energy to create, transport, and erect the new materials, compared to the energy needed to renovate the existing building, and it would also compare the relative energy costs to operate a new building compared to a renovated building.

A similar analysis considering sites in other commercial districts with vacant or lightly developed sites, such as Hudson Yards or Long Island City, would contrast the energy budgets of replacing a large building versus replacing small buildings.

It is sometimes said that the greenest buildings are those that already exist, and, without prejudging the analysis, there may be energy reasons for encouraging the reuse of large existing buildings on many sites in East Midtown and the development of new buildings on less developed sites elsewhere.

Task 12. Transportation: A major factor in the relative attractiveness of East Midtown is the accessibility of its location – it is central to other activities and it is well served by public transportation. More than the generosity of zoning, location is what attracts tenants and developers. The analysis should consider the effect

that changes, such as East Side Access for the Long Island Rail Road, will have on, for example, the relative attractiveness of the several central business districts and the softness of sites near Grand Central.

The transportation section of the proposed scope does not mention Amtrak or the three commuter railroads: Metro-North, LIRR, and NJ Transit. Nor does it specifically mention the Second Avenue subway.

The relative attractiveness of the city's several commercial districts depends in large part on their access. Lower Manhattan, for example is at a disadvantage as a location for corporate headquarters because East Midtown is closer to where many of the heads of those corporations live. Therefore, the transportation section needs to consider not only the impacts of increased density on transit in East Midtown but also the effects of changes in the transit system on the attractiveness of the commercial districts.

The scope should obviously consider the existing Metro-North service as well as the planned LIRR service to Grand Central, including access to their facilities, and the stages of the Second Avenue subway much as it proposes to consider the existing subway.

The scope should also consider the effects of changes in the transit system on the interrelationships of the various commercial districts. Changes that are known to be planned or have been studied include:

- Routing Metro-North service to Penn Station via Sunnyside Yards and Riverside Park.
- Providing NJ Transit revenue service to the planned intermodal station in the Sunnyside Yards at Long Island City when East Side Access opens.
- Extending the Second Avenue subway to Lower Manhattan.
- Track connections between Grand Central and Penn Station that would allow Amtrak service and NJ Transit service through Penn Station to Grand Central and Metro North and/or LIRR service through Grand Central to Penn Station.

East Side Access will, of course, increase the attractiveness of East Midtown and the Sunnyside Yards station would increase the attractiveness of Long Island City. What are the other impacts?

Task 20. Alternatives: The goals of the proposed action are to maintain the attractiveness of East Midtown by seeding it with a few new, iconic, class A office buildings and by improving the public realm. It is claimed that the existing Special Midtown District and its Grand Central Subdistrict are unsuccessful and need to be replaced because they have not engendered more development (although it was the goal of these regulations to shift development away from East Midtown).

An alternative that would address both goals, without reversing 30 or 40 years of public policy, would be to amend the Grand Central Subdistrict to make it more as-of-right and predictable and to recognize the evolving needs of the public realm in the two decades since the subdistrict was established.

The nexus of the subdistrict is twofold: the "airpark" above Grand Central Terminal, which is preserved by the removal of the unused development rights, and the pedestrian concourse system of Terminal City that serves Grand Central and the adjacent buildings. These are the goals that justify the provisions of the zoning. The boundaries of the core within which greater FARs are allowed should be adjusted to relate to these two density ameliorating amenities. The result would be a compact district facilitating the desired new buildings where they can best be accommodated and where they can best contribute to the improvement of the public realm.

The uncertainties of obtaining approvals under the subdistrict could be reduced by preparing a more evolved urban design plan for the affected sites, showing programmatically and diagrammatically what the new buildings would be expected to contribute to the public realm and the urban environment. The new urban design plan would seek to seamlessly integrate the existing Metro-North facilities, including North End Access, the new LIRR facilities, especially its concourse under Vanderbilt Avenue, the existing subway complex, the various connecting buildings, and the adjacent streets in order to maximize the synergy and the predictability of the many improvements.

I am hopeful that these issues will be fully explored.

Thank you for the opportunity to speak.