

# Riverside South Planning Corporation

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## Officers

November 14, 2008

Paul J. Elston  
President & Chair

Helen Rosenthal, CB 7 Chair and Co-chair RSS Working Group  
Ethel Sheffer, Co-chair RSS Working Group  
Manhattan Community Board 7  
250 West 87<sup>th</sup> Street  
New York, NY 10024

Kent Barwick  
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Mary Frances  
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Dear Helen and Ethel,

Thank you for conducting the public meeting on the Extell proposals for Lots L, M and N of Riverside South development – and thank you for the invitation to submit a written statement to supplement our comments at the meeting on October 30, 2008. We are attaching the charts that we distributed at the meeting. We look forward to a discussion about these concepts with CB 7.

## Other Board Members

William Cohan  
Roberta Gratz  
Ashok Gupta  
Victor Kovner  
Max Shulman

At the end of the meeting, you invited Gary Barnet to address the audience with closing comments. Gary said that while he appreciated the desirability of many of the proposals put forward by the RSPC, he thought it was a mistake for the community to support the “desirable” at the cost of the “possible”. We think that statement is indicative of Extell’s approach to this development. Extell is primarily interested in building and selling (at a maximum possible profit), and is not interested in the long-term implications of their plan for the local community or the NYC community at large. The residents of CB 7 will live with the results of these decisions permanently. We believe that Extell will make billions of dollars on the L, M and N development and has the capability to providing the long-term benefits that were promised to the community in 1992 and still make billions in profits.

## Member Organizations

Municipal Art Society

Natural Resources  
Defense Council

New York League of  
Conservation Voters

New Yorkers for  
Parks

Regional Plan  
Association

Riverside Park Fund

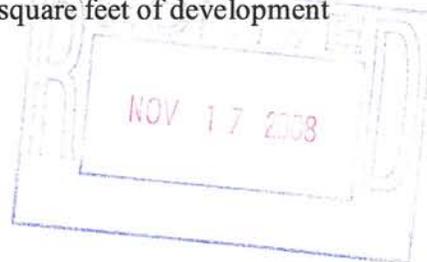
Westpride

## Advisors

Sean O'Brien  
Steve Robinson  
Paul Willen  
Rob Pirani

In summary, the RSPC urges the CB 7 to consider supporting the following agenda:

- The initial public meeting to consider the scope of the Supplementary EIS should be delayed until (1) City Planning completes a review of Extell’s compliance with the 1992 agreements, (2) the NYCEDC completes its energy assessment, and (3) the CB 7 Committee Members have had a chance to consider the issues raised at the Public Meeting.
- The density of the development should not be increased
- The developer should complete (fund and construct) the tunnel shell and park by 2018
- Oppose Extell’s plan for Lots L, M and N – it does not create public park space or a community connection to the waterfront, and it does not preserve a view of the Con Edison Power Plant
- Support a New Public Park between 59<sup>th</sup> and 60<sup>th</sup> Street and a concentration of the allowable 2.4 million square feet of development between 60<sup>th</sup> and 61<sup>st</sup> Streets.



- Support full study and consideration of beneficial Community Utilities in the below grade area.
- Insist on a high standard for Sustainable Development investment incorporating the Mayor's PlaNYC policies, and insist on full participation and review by the local community and other stakeholders.
- Express support for full consideration of the converting the Con Edison Power Plant to a world-class cultural center, a community market, or other appropriate use.

We offer the following seven (7) recommendations for consideration by CB 7:

## 1. COMPLIANCE WITH 1992 AGREEMENTS

We urge the CB 7 to recommend to the CPC that they evaluate Extell's (and the predecessor corporations') compliance with the 1992 agreements before initiating the City approval process with a scoping meeting for the Supplemental Environmental Impact Statement. We realize that City Planning is primarily responsible for compliance with the 1992 Restrictive Declaration and the conditions of the CPC approval of the Special Permits, we will urge City Planning to create a full public record on the developer's compliance with the City agreements that are part of the 1992 approvals including the:

- Restrictive Declaration
- Conditions of approval for the Special Permit
- Mapping Agreement
- Park Operations and Maintenance Agreement
- Commitment letters to the Commissioner of Telecommunications and Energy

City Planning has required Extell to comply with the sustainability requirements of the Restrictive Declaration, and Extell as provided a schedule to City Planning for reporting on Buildings I and J, and committing to provide similar reports on Buildings K, L, M and N. City Planning will be assisted by the NYCEDC in evaluating Extell's submissions. We will urge City Planning and the NYCEDC to incorporate CB 7 and RSPC in the review of these documents.

Attachment 1 is a memorandum from our lawyers delineating the developers' responsibilities. We will ask City Planning to evaluate Extell's compliance with each of the delineated responsibilities in the City Agreements, and to complete the evaluation before convening the Supplementary EIS Scoping meeting. We hope you will support that request.

## 2. DENSITY

In considering the plan for L, M and N, we will urge the CPC to stand by the limits that were set in the 1992 Restrictive Declaration. New approvals by the CPC should be consistent with earlier approvals particularly with respect to density and FAR and the number of parking spaces.

The information provided by CB 7 at the October 30<sup>th</sup> public meeting indicates that

Extell is now proposing to increase the authorized square feet to 3.1 million, an increase of 730,000 square feet and to increase the authorized number of parking spaces to 1800 spaces as compare to the 743 currently authorized. All of these proposed increases conflict with the restrictive declaration and we will urge the CPC to reject them.

The RSPC opposes the proposal by Extell to increase the amount of development on Lots L, M and N, and we will urge the CPC to stand by the limits that were set in the 1992 Restrictive Declaration. We support a change in the “uses” allowed under the Restrictive Declaration, but we propose that the approximately half of the lots be designate “public park land”.

We believe that Extell’s proposed increase in development rights present a significant citywide issue concerning all of the large-scale developments that have been approved by the City, and are currently being considered by the City. The CPC and the City Council made a decision about the density of the entire Riverside South development in 1992 (including Lot N) with full knowledge of the underlying zoning and after consideration of the density of the surrounding developments in reaching their determination. This determination constituted a pact with the local community and the RSPC. It is similar to the determinations and pacts that have been reached in numerous other large-scale developments that have been proposed to the City such as the Brooklyn Waterfront, Atlantic Yards in Brooklyn and Manhattanville. Further, the City will consider a similar type of pact with respect to the Hudson Yards. If the CPC were to approve Extell’s request, it would suggest that no community or civic organization could rely on the agreements reached with City Officials when considering these large developments. An approval of Extell’s proposal would abandon earlier promises and set a bad precedent for the City.

We agree with CB 7 that these proposed increases in density are contrary to the interests of the local community and the interests of the larger NYC community.

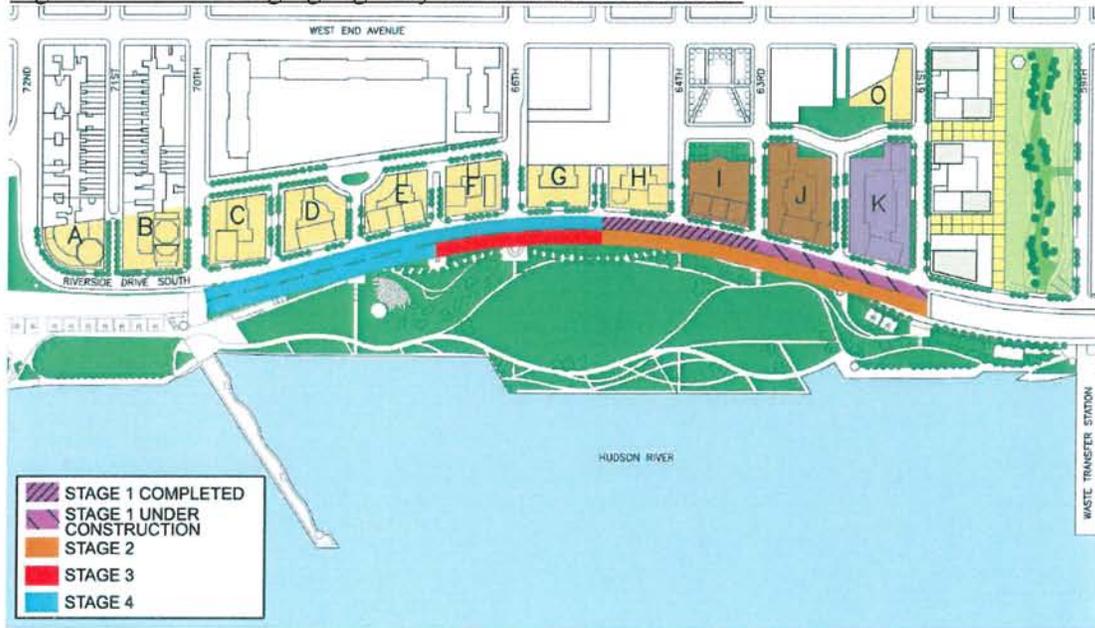
### 3. COMPLETING THE PARK

Completion of Riverside South Park by relocating of the Miller Highway through a tunnel has always been an essential part of the Civic vision for Riverside South Park. For the RSPC, completion of the 21.5 acre park was a central element of the bargain that it made with the developer in 1992. We believe that the developer should be required to fund and construct the tunnel shell, and to complete the tunnel shell as he completes work on Lots L, M and N. The developer’s ability to receive a certificate of occupancy for the buildings should be conditioned on completion of the tunnel shell and the park.

The portion of Riverside Park South by the Hudson River that is west of the viaduct has been completed. However, currently, the elevated portion of the West Side Highway cuts through the entire three-quarter mile length of the park, creating a physical and visual obstruction that separates local community and park users from the water’s edge. If the elevated highway remains in place, more than 1/3 of the public waterfront park acreage (or more than 8 acres) will be under the elevated structure, severely restricting the park’s utility by limiting the available open space, producing noise and air pollution from car traffic, and forcing cyclists and rollerbladers to travel under the shadows of a looming,

dangerous roadway. We have had reports of major pieces of the viaduct structure and debris falling on the park area below the viaduct.

Figure 1: Plan for staging highway tunnel shell construction



The need for a fully functioning park without the imposition of the viaduct has increased since 1992 because of the expanding residential population in the area. Just as Riverside South development has created a need for more school space, the increase in the residential population requires fully-functioning park space, without the barrier created by the viaduct, and the deafening noise and safety issues - and better access to the Hudson River waterfront and the greenway. The addition of more residencies on Lot N will increase these needs. We agree with the concern expressed in the CB 7 letter of April 18, 2008 about the community access to the waterfront park, and you will see below specific suggestion for a plan that would increase the park land available to the community and significantly improve the access for the local community to the waterfront park. We urge CB 7 to support these improvements for the residents of the local area.

If the shell for the tunnel is built now as opposed to waiting until 2025, it will eliminate the need to dig up the park after it has been newly constructed, and would allow for the use of the existing construction-infrastructure for construction of the northern sections. Further, if Extell builds the tunnel shell, it will get built faster and cheaper. Based on the reported cost of the tunnel shell construction between 62<sup>nd</sup> and 65<sup>th</sup> Streets, we estimate that the cost of completing the tunnel shell will be about \$200 million. Attachment 2 is our section by section estimate of the cost of the tunnel shell.

Figure 2: Existing tunnel shell construction



We realize that this is a large sum, but we believe that the economics of this development are sufficient to support requiring the Developer to provide this public benefit. We estimate the developer is likely to realize a profit of \$2.3 - \$3.8 billion for the development of the allowable 2.4 million square feet on Lots L, M and N. We have included our profitability analysis as Attachment 3. This analysis is conservative (may understate the profit), and we challenge Extell to rebut the analysis. Further, while we recognize that the real estate market is likely to be depressed during the next couple of years, Extell does not plan to complete construction of L, M and N until 2018.

In addition, Extell should be required to fully fund the complete construction of the park on top of the tunnel shell – not just to the existing \$64 million requirement. Extell has provided information to the Department of Parks and Recreation indicating that they have spent \$43,208,000 on the Park constructing Phases 1-4 and that estimating that \$20,280,000 remains available for Phases 5-7. However, the numbers have not been independently checked and we think that Extell may be including costs that should not be attributed to the Park. For example, the spending figures include the cost of two relieving platforms most or all of which Extell would have to build with or without the Park. We think it is important that an independent audit of these costs should be conducted at this time so that an accurate estimate can be made of the additional funding that is available for Phases 5-7.

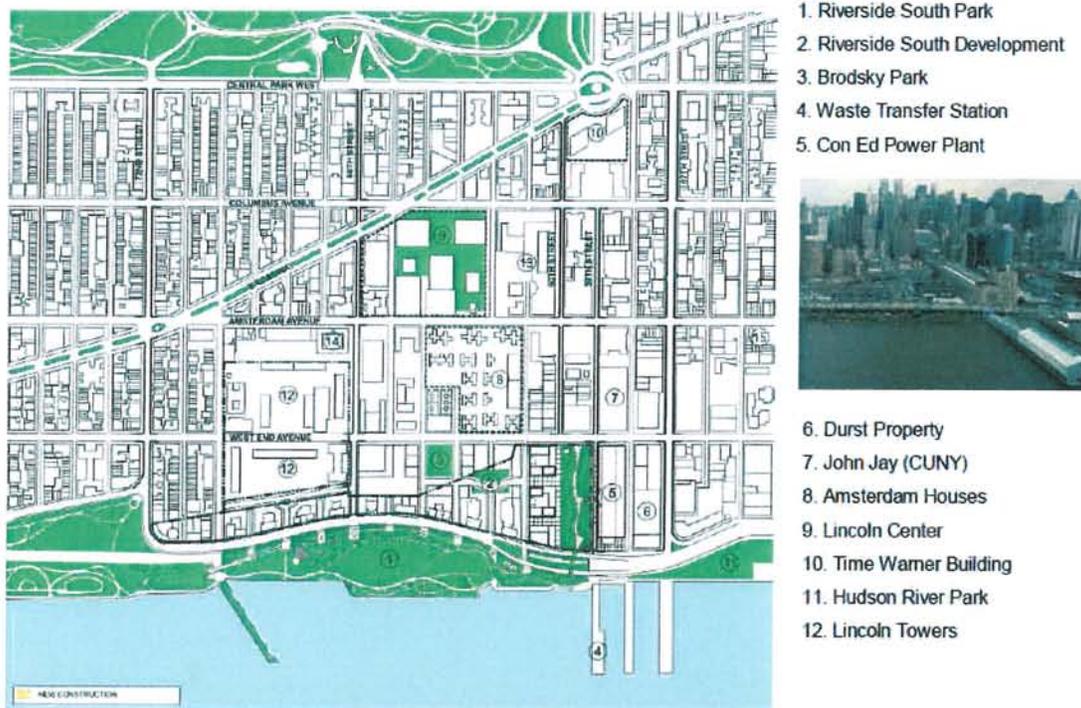
Further, before approvals for Lots L, M and N are given, we think it is important that Extell complete a design for Phase 5-7 of the park and develop an up-to-date estimate of the final cost of building the Park. This estimate should include the cost of removing the abandoned columns and other structures under the 70<sup>th</sup> to 72<sup>nd</sup> Street areas, and should include the cost of building the tunnel shell for its entire length (60<sup>th</sup> to 70<sup>th</sup> Streets).

RSPC urges the CB 7 to recommend to the CPC that it require Extell to provide the additional funds that are required to complete the Park, and to include in its definition of “complete” the funding required to complete the tunnel shell between 60<sup>th</sup> and 70<sup>th</sup> Streets. Extell should be given the responsibility for funding and constructing the entire tunnel shell before they are awarded a certificate of occupancy for buildings on Lots L, M and N.

#### 4. PLAN FOR LOTS L, M AND N

We think the buildings in Extell’s plan for Lots L, M and N are too large and the layout does not adequately connect to the local area or consider the needs of the local residents. Extell’s plan creates a barrier to waterfront access, provides only limited private park that is dominated by the shadows of the tall buildings, buries the view of the Con Ed power plant and creates a “dead end” at 59<sup>th</sup> Street and the waterfront. Extell proposes a “center” that looks inward, and turns its back on the local community and the Con Ed Power Plant.

Figure 3: Area Map  
**Planning beyond the boundaries of L, M and N**



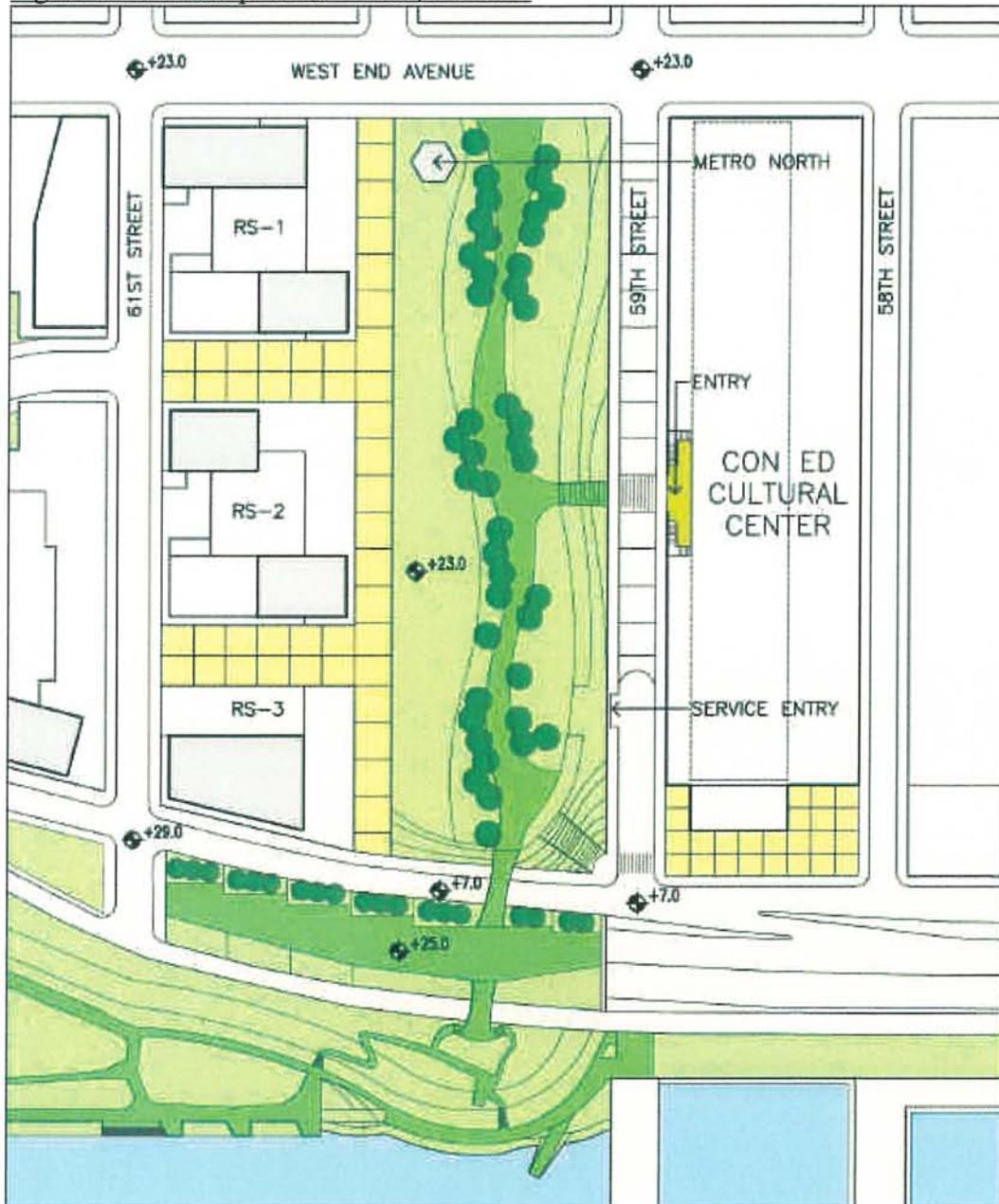
In order to grant a special permit for a “general large-scale development (pursuant to Section 74-743, Special Provisions for bulk modification), the CPC must find that the proposed plan would create a better relationship among buildings, open areas, surrounding developments and shorelines, and must benefit “the neighborhood and the City as a whole”. We do not think the Extell plan meets this standard – it completely ignores and depreciates the beauty of the Con Edison Power Plant and does not connect to the shoreline.

In May, 2007 the RSPC convened an expert panel that included RSPC Board members

and outside experts with a mandate to define the “public interest” in the plan for the south end of the Riverside South development. The Expert Planning Panel reviewed the status of the project, studied the area around and including Lots L, M and N, and developed a set of recommendation for the RSPC Board. The Plan resulting from the expert panel is provide below.

The Expert Planning Panel concluded that the plan should provide a park connection between the local community and the Riverside South Park and the Hudson River Park, and preserve the open vision of the Con Edison Power Plant. It recommended that the

Figure 4: Sketch of plan for Lots L, M and N



new development of 2.37 million square feet of new buildings be clustered between 60<sup>th</sup> and 61<sup>st</sup> Streets, and that the block between 59<sup>th</sup> and 60<sup>th</sup> Street become a public park – with “community utilities” located beneath the park. The Expert Planning Panel recommended a planning approach that was responsive to the neighborhood, looked outward rather than inward, provided for substantial public activity and involvement, featured a major open connection to Riverside Park South and the waterfront, and recognized the full visual and functional potential of the historic Con Edison Building.

To fulfill these goals, the Panel recommended a major new public park between 59<sup>th</sup> Street and 60<sup>th</sup> Street, which would serve as a bold, wide connection between the upland community and the waterfront, provide for extensive community and retail activity fronting on the park, and preserve the open vision of the Con Ed Building in its full 800 foot length. The Panel also recommended an extension of the park over the relocated highway connecting directly to the south entrance to Riverside South Park, an inland extension of Riverside Park South.

The Panel also recognized the majesty of the interior of the Con Edison Power Plant, and the potential for converting it from a power plant to public space with a strong connection to the new park, converting it to a cultural institution operated by the Department of Parks and Recreation. The power to replace the plant could be provided by a new, efficient cogeneration plant located on Lot N.

The Panel recommended that the new development of 2.37 million square feet of new buildings (mostly residential) be clustered in three small blocks in the adjoining parcel to the north, between 60<sup>th</sup> and 61<sup>st</sup> Streets -- with direct access to the park and the retail/community activities right there. These buildings would also enjoy superb views in all directions – above all, across the Park to the south, with full sunlight, at the low Con Edison Building and over it, to the river and midtown beyond. Although these tall buildings are “midtown” in character and arrangement, they can be thought of as an inland extension of the linear plan of Riverside South as well.

Comparison of Proposals for Lots L, M and N			
	<u>Rest. Dec.</u>	<u>Extell</u>	<u>RSPC</u>
Zoning (Sq. Ft.)	2,372,192	3,293,750	2,372,192
Dwelling Units	577	2,500	1,800
Parking Spaces	743	1,800	743
Public Park (sq ft) including area over Highway	0	0	252,732
Privately Owned Public Space (sq ft)	63,802	89,896	51,323
Public Roads (sq ft)	0	57,177	0
Building Footprints	301,380	176,309	123,804
Maximum Height (feet)	386	623	610

Figure 4 is a sketch of this plan and Figures 5 and 6 are two cross sections of the proposal.

Figure 5: Cross section through park looking west

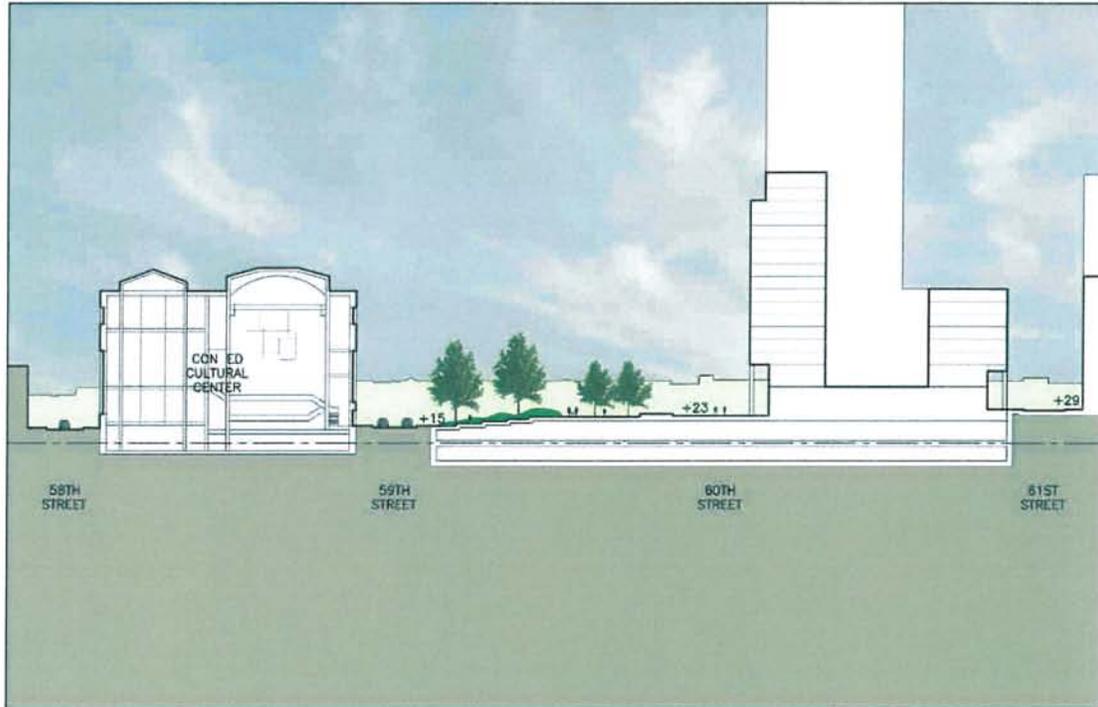
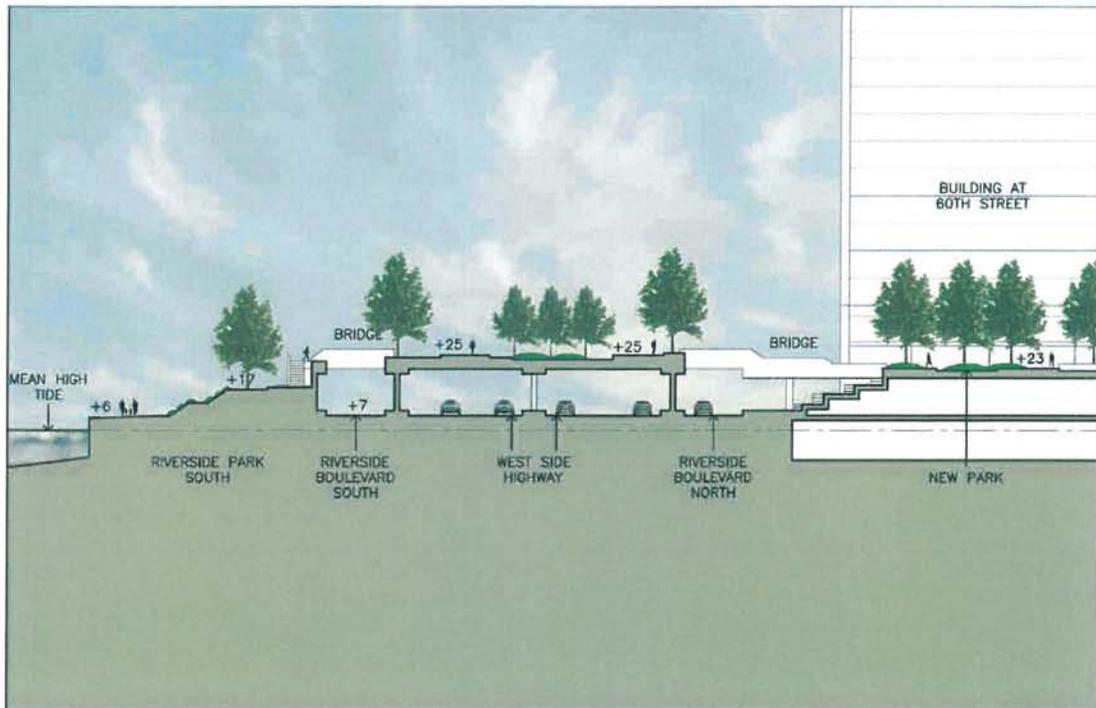


Figure 6: Cross section through highway looking north



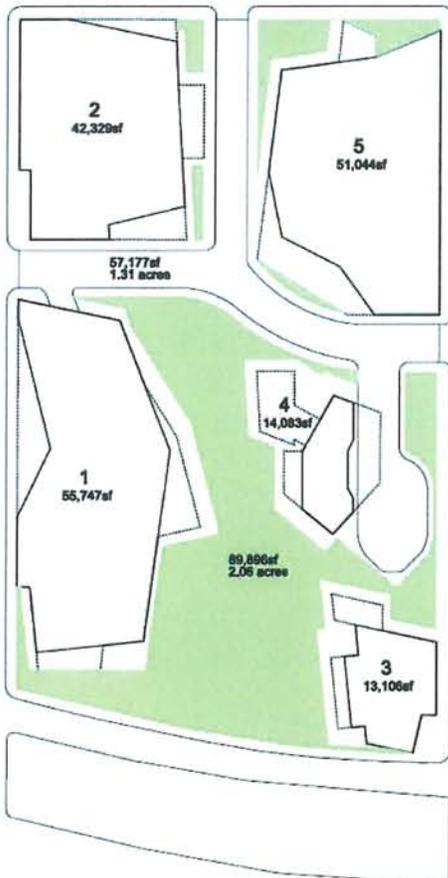
4(a) Park connection to the waterfront for the local community.

The April 18, 2008 CB 7 letter calls for the open space and street network within the new development to “provide adequate connection and integration” with the waterfront park. We support this requirement and believe it is one of the most important design principles that should guide the design. The Extell plan does not achieve this objective.

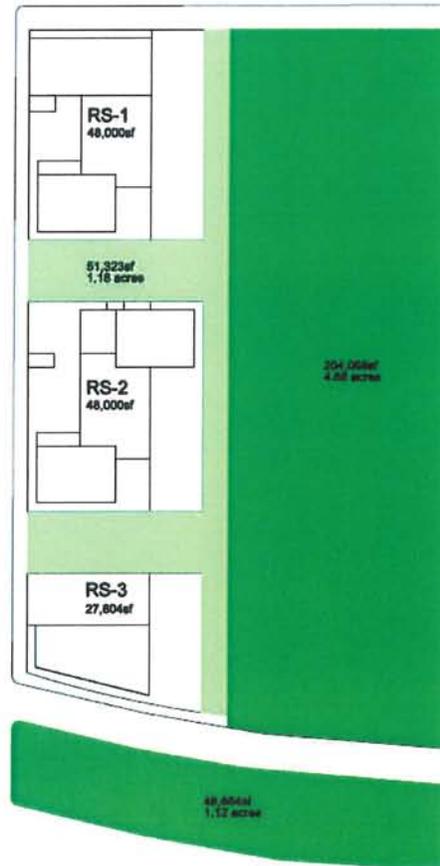
Extell proposes a 2.06-acre private park (Privately Owned Publicly Accessible Space, POPS) that is designed for the use of the residents of the new buildings as a backyard and creates a dead end on the western border of the lots. It provides paths that run north-south, directing the users away from the waterfront and includes a pool of water designed to suggest a continuation of 60<sup>th</sup> Street but effectively eliminating the use of the space by strollers – it may work visually, but it creates another barrier to waterfront access.

Figure 7: Comparison of Extell and RSPC open space proposals

Extell Proposal - 2.06 acres POPS



RSPC Proposal – 5.8 public park, 1.2 POPS



As an alternative, the RSPC proposes a much larger public park area (5.8 acres) plus 1.2 acres of POPS.

We note that Extell claims that it is proposing of 3.16 acres of privately owned, publicly accessible open space. However, a good portion of that space is under building-overhangs and is not open space that will allow a person to see the sky above. It is part of the private space that is attached to and under the buildings. We measure the open space that is privately held and not under buildings at 2.06 acres.

#### 4(b) View of the Con Edison Power Plant

The plan for the south end of Riverside South should also recognize the special land-marking characteristics of the Con Edison Power Plant on the south border of the development and should preserve the existing open vision of the plant.

Figure 8: Historic Power Plant



The Con Ed Power Plant was designed by Stanford White in 1902 and construction was completed in 1905. Initially, it was known as the Interboro Rapid Transit (IRT) Powerhouse and served as the primary source of electricity for the predecessor to today's MTA Subway System. The power plant was able to produce more power than any other built at the time, about 100,000 horse power or 75 megawatts of capacity. The building was used by the IRT and its successor, the NYC Board of Transportation, until 1959. The City sold the building to Con Edison in 1962 for use as a powerhouse. The 59<sup>th</sup> Street Power Plant produces about 10% of the steam for Con Ed's steam system and the building contains five boilers.

City Council Member Gale Brewer, recently sent a letter to the Landmarks Preservation Commission asking them to consider landmarking the Con Ed Power Plant. We support that request and we hope that the CB 7 and CB 4 will join us in that support. In addition, the RSPC is working as part of a Coalition of Waterfront Park and Preservation groups to advocate converting the inside of the building to a public space to serve as an art museum, a public market, a performance space or other community space. The proposal is dependent on replacement of the power equipment operated by Con Edison in the Power Plant with new, much more energy efficient cogeneration under our proposed new park.

#### 4(C) Area below the Park

The Expert Planning Panel convened by the RSPC recommended that the area under the new park be evaluated for dedication to community utility functions including:

- Metro-North Station - The Metro-North plans to build a railroad station at 59<sup>th</sup> Street and West End Avenue as part of its program to improve service on the Hudson Line. We urge CB 7 to support a requirement for the developer to construct his buildings around the space required for a railroad station.

The Empire Connection, a rail line along the Hudson River that connects Spuyten Duyvil with Penn Station, runs through the Riverside South site. The Mayor has

identified initiation of service on this line as part of his transit infrastructure improvements in PLANYC. Metro-North commissioned a September 2002 report by Parsons Brinckerhoff. The report identified the option of building a rail station at 59<sup>th</sup> Street and West End Avenue as one of the two attractive alternative locations for a rail station on the line. A station at 125<sup>th</sup> Street to serve the new Manhattanville development was the second attractive alternative. In the ULURP we will urge the City Planning Commission to require that Extell reserve space for this rail station on Lot N, creating a shell around the station area and railroad track.

We believe that the considerations during the regulatory process are important to Metro-North because the Empire Connection runs through the site. The railroad track is currently uncovered and 23 feet below West End Avenue, but will be entirely covered by the new development. Unless provision is made for a Metro North station during this regulatory process, the option for it may be lost to the MTA. On the other hand, if the construction by the developer proceeds in a manner that anticipates the railroad station, it may be an opportunity to create the station relatively inexpensively.

- Cogeneration for an Energy District and Con Ed Steam System – The Mayor’s PLANYC establishes a policy that any new development that is over 300,000 square feet should evaluate the creation of an Energy District that would provide electricity, cooling and heating for the new development. A cogeneration plant built under the New Park could increase the energy efficiency of the new development by a factor of three. In addition, we advocate that the developer evaluate the construction of a cogeneration system that is sufficient to meet the requirements of the Con Edison steam system and replace the power produced by Con Edison 59<sup>th</sup> Street Power Plant – in order to allow the conversion of the Power Plant to a public space.
- Truck-less waste removal system for the new development – Rather than creating new waste removal truck traffic on the local streets, the developer should evaluate the creation of a truck-less waste removal system for the new development (including the buildings on Lots J and K) that would collect the waste from these buildings using an underground system designed into the foundation of the buildings and that gathers the waste under Lot N, separates the waste directing the appropriate waste to an Anaerobic digester that would feed the cogeneration system with methane, and removes the residual waste by rail on the Empire Connection.
- Tipping Floor on Lot N to serve Pier 99 - The space under the Park should also be evaluated for use as a tipping floor, and for shredding and compaction to serve the Pier 99 with an underground tunnel to convey containerized waste to Pier 99, built as part of the new foundation for the relocated Miller Highway. This arrangement would allow the City to use Pier 99 for the “water-dependent” use, loading the containerized waste onto barges, and would eliminate the need to bring trucks to the waterfront park and to build a ramp on 59<sup>th</sup> Street (for ¾ of the length of the block) and a bridge over the relocated highway. Locating the tipping floor under the New Park on Lot N might also provide the opportunity to remove the waste by

rail - a tipping floor with two exits to respond to the market.

We urge the CB 7 to join the RSPC in asking the City to require Extell to fully evaluate these uses for the below-grade area of the development. We think these uses should be considered with parking and other local-serving commercial uses. We do not think a big box store is appropriate or desirable because it will create new and unnecessary traffic for the area.

## 5. SUSTAINABLE DEVELOPMENT

The April 18, 2008 CB 7 letter calls for “the highest demonstration of adherence to sustainable practice in construction and energy consumption” that will “provide a model of innovation and excellent practice” and the RSPC supports that standard

Extell has refused to comply with the requirements for sustainable development that are set by the Restrictive Declaration and the Design Guidelines – both of which call for investment by the developer in any sustainable development improvement that has a payback period of five years or less and periodic reporting to the City and the local community. Limiting the consideration of sustainability to the LEED standard (either the minimum or highest level) is inadequate in this circumstance.

The RSPC will urge the CPC to require Extell to comply with the requirement in the 1992 Restrictive Declaration that the developer invest in any sustainable development opportunity with a five-year payback in all of its buildings, and to comply with the existing procedural requirements for determining which investments meet that criteria. Further, we will urge the CPC to require Extell to implement the Mayor’s policies defined in PlaNYC in buildings on Lots J, K, L, M and N, including the requirements to:

- Meet the Mayor’s goal of 20% beyond the Energy Code
- Evaluate Energy District - Any development over 300,000 square feet will evaluate the creation of an Energy District;
- Increase Energy Efficiency - Cogeneration to provide electricity, and heating and cooling;
- Increase biofuel use from waste - Anaerobic Digester that produces a biofuel from the waste of the new development;
- Conserve Water - Use grey water for irrigation and High Level Storm Sewers for separated discharge;
- Reduce traffic congestion – use rail for waste removal and for material deliveries;
- Reduce Air Pollution – all construction equipment should use ultra low sulfur fuel and meet City-Agency efficiency standards of operation;
- Use environmentally smart materials and appliances:
  - Carpet, painting, wall coverings, building insulation, gypsum board, ceramic tile, acoustical ceilings, wood flooring, resilient flooring and kitchen casework
  - Exterior skin or envelope of the building including glass type, wall construction and insulation, roofing insulation and built-in shading
  - HVAC system including boilers, heat exchangers major pumps, chillers and other major equipment
  - Plumbing system including domestic hot water heaters

- Electrical system including common area lighting, electric heating, control systems for major motors
- Appliances and lighting within in the public areas and in the apartments
- Increase commuter and subway rail transportation – The existing Empire Connection, a train track that that connects Spuyten Duyvil to Penn Station, running along the Hudson River and through Riverside South, provides an opportunity to increase rail use for moving people, goods and waste.
- Provide Affordable Housing

We urge the CB 7 to recommend that the CPC require Extell to evaluate and incorporate into its design all of the new requirements of PlaNYC, and to incorporate any sustainable development opportunity that has a payback period of less than five years as a condition for any approvals. As with the requirements in the 1992 Restrictive Declaration, Extell should be required to systematically engage with the City, the CB 7 and other stakeholders in determining which sustainability measures should be incorporated into the design and should evaluate the success of the measures after the fact with appropriate reporting on the results.

#### 6. PROVIDE FOR SCHOOL SPACE AND COMMUNITY FACILITIES SPACE

We understood from Extell's presentation at the public meeting that they plan to provide 97,000 square feet of white box school space in Building 2 at no cost to the Department of Education (DOE to pay for the build-out). We think that Extell will profit from the increased value of the higher floors provided as an offset to the school space.

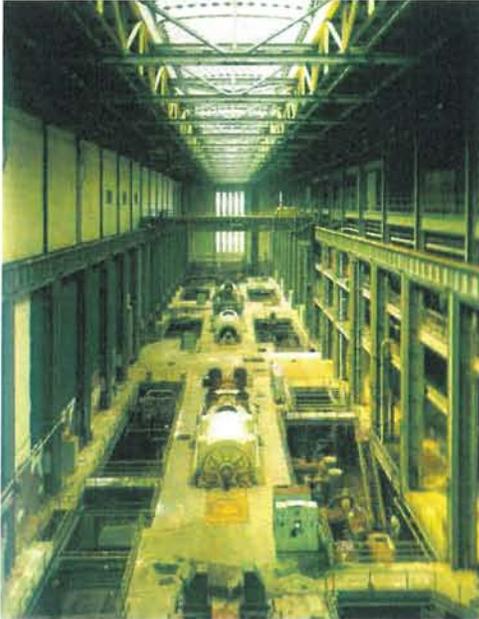
The 1992 Restrictive Declaration requires Extell to provide 50,000 square feet of community facility space. If this space has not already been provided by the developer, it should be included in the development on Lots L, M and N.

#### 7. CON EDISON CULTURAL CENTER

The RSPC urges CBs 4 and 7 to support a civic plan that preserves the existing vision of the Con Edison Street Power Plant, promotes it as a landmark, and converts the plant into a cultural center. The Con Ed power plant at the edge of the project may provide an extraordinary opportunity to create a spectacular public space and provide the anchor for a vibrant connection for the local community to the waterfront park. It should anchor the vision for the south end of the development on Lots L, M and N.

The Con Edison Power Plant is part of the Con Edison Steam System that supplies steam to private customers. The Steam System serves around 1800 customers with steam for space heating and hot water and provides 363 of those customers with steam for cooling equipment. The number of customers served by the system has shrunk modestly during the past five years and business is only marginally profitable for Con Ed – producing a net loss to the Company in 2004. We view the steam system as an important environmental asset, particularly if the distribution system is attached to efficient cogeneration. The New York City Economic Development Corporation is evaluating the energy efficiency and requirements of a cogeneration plant to serve an energy district for the new development at Riverside South and to replace the power produced by the

Tate Modern – Before



Con Edison Power Plant - current



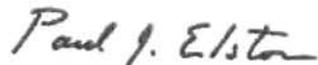
Tate Modern - After



existing operations of the Con Edison Power Plant. If this evaluation shows sufficient energy efficiency, it might be possible to retire the Con Ed Power Plant as a power station and converting it to a cultural center. By way of example, the Tate Modern Museum in London is shown below before its renovation. It is very similar to the inside of the Con Edison Power Plant.

We believe that the decisions made before and during the upcoming ULURP will significantly shape an important area within CB 7, and we welcome CB 7's leadership on these issues that will affect local residents for many years to come. We should not let the "sell and run" approach of the developer dominate these decisions. We look forward to working with you to make this area better for the local community and the larger community of New York City.

Sincerely,



Paul J. Elston, President

Cc: Amanda Burden, Chair, City Planning Commission  
Adrian Benepe, Commissioner of Parks and Recreation  
Gale Brewer, City Council Member  
Scott Stringer, Manhattan Borough President  
Jerrold Nadler, Congressman  
Linda B. Rosenthal, Assembly Member  
Tom Duane, State Senator  
David Karnovsky, General Counsel, City Planning Department  
Alison McCabe, Assistant Counsel, City Planning Department  
Adam Wolff, City Planning Department  
Adam Meagher, City Planning Department  
Mark Shaw, Extell Development  
Gary Barnett, President, Extell Development

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The Riverside South Planning Corporation is a not-for-profit corporation established for the purpose of creating, advancing, and overseeing a master plan for the development of the former Penn Yards site. RSPC represents the interests of its seven not-for-profit member organizations – the Municipal Art Society, the Regional Plan Association, New Yorkers for Parks (formerly known as The Parks Council), the Riverside Park Fund, Westpride, Natural Resources Defense Council and the New York League of Conservation Voters.