



CITY PLANNING COMMISSION
CITY OF NEW YORK

OFFICE OF THE CHAIR

February 14, 2022

Hope Knight, President and CEO-designate
Empire State Development Corporation
633 Third Avenue, 37th Floor
New York, NY 10017

RE: Comments on the World Trade Center Memorial and Cultural Program General Project Plan

Dear Ms. Knight,

The City Planning Commission (the “Commission”) has reviewed the proposed amendment to the World Trade Center Memorial and Cultural Program General Project Plan (“WTC GPP”) issued by the New York State Urban Development Corporation d/b/a Empire State Development (“ESD”). The goal of the WTC GPP is to create a plan to redevelop the World Trade Center (“WTC”) campus after the attacks of September 11, 2001. The plan provides for commercial towers, public open space, a performing arts center and cultural uses, and a 9/11 memorial.

The proposed amendment to the WTC GPP is focused on Site 5 located at 130 Liberty Street on the southernmost edge of the WTC campus. According to ESD, the proposed amendment will be undertaken in two phases with the first phase focusing on expanding the permitted uses on Site 5 to include the option of a mixed-use tower with residential and community facility uses, in addition to the commercial office and retail uses previously authorized on the development site. The second phase of the proposed amendment, which will take place in the upcoming months, will include the various overrides of zoning provisions, including aspects of site and building design related to such provisions, and the business terms related to the development of the tower. This second phase will also have a public process that includes a review and recommendation by the Commission. ESD held a public hearing on the first phase of the proposed amendment to the WTC GPP on January 12, 2022, and this letter represents the Commission’s recommendation on this first phase.

The WTC GPP is subject to Commission review pursuant to the provisions of Subdivision 3 of Section 16 of the New York State Urban Development Corporation Act, which provides that a planning board or commission may recommend approval, disapproval, or modification of a general project plan, whenever such plan requires the override of local law or regulation for implementation. Over the two phases of the Site 5 project, the WTC GPP proposes several overrides of the New York City Zoning Resolution and other local law including but not limited to use regulations, floor area ratio, height, setback, curb cuts, pedestrian circulation space, lobby space, and location of retail space.

The Commission supports the overarching goals of the WTC GPP to appropriately develop the various sites and is pleased to see efforts continue to progress. The Commission believes that expanding the uses

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that are permitted on Site 5 to include the development option of a mixed-use tower with residential and community facility uses, is appropriate. Accordingly, the Commission recommends its full support and approval for the use change on Site 5 to include residential and community facilities in the first phase of the process to amend the GPP.

Regarding the second phase, the Commission encourages the State, the City and the other stakeholders, to continue to work together in the upcoming months on the other elements that will constitute the second phase of the proposed amendment, such as the amount of affordable housing, the zoning waivers, business terms, and the overall design guidelines of Site 5. The Commission acknowledges that the proposed inclusion of permanently affordable new housing on this site is crucial to the equitable and sustainable growth of the City and supports efforts to deliver that goal. The Department and the City looks forward to working with ESD in a coordinated planning process on the continued refinement of the proposal.

Sincerely yours,

A handwritten signature in black ink, appearing to read "Daniel R. Garodnick", written in a cursive style.

Daniel R. Garodnick

cc: E. Hsu-Chen, S. Amron, E. Botsford, S. Johnson, D. DeCerbo