
Appendix C: Written Comments on the DEIS



BOROUGH PRESIDENT RECOMMENDATION

Project Name: 175 Park Avenue	
Applicant: David Karnovsky	Applicant's Administrator: David Karnovsky
Application # 210417PPM	Borough: Manhattan
CEQR Number: 21DCP057M	Validated Community Districts: M05

Docket Description:

IN THE MATTER OF an application submitted by the Department of Citywide Administrative Services pursuant to Section 197-c of the New York City Charter, for the disposition of a city-owned property located at 175 Park Avenue aka 109 East 42 Street (Block 1280, Lot 30), pursuant to zoning, Borough of Manhattan, Community District 5.

Please use the above application number on all correspondence concerning this application

RECOMMENDATION: Conditional Favorable

Please attach any further explanation of the recommendation on additional sheets as necessary

CONSIDERATION:

Recommendation submitted by	MN BP	Date: 8/19/2021 3:03 PM
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BOROUGH PRESIDENT RECOMMENDATION

Project Name: 175 Park Avenue	
Applicant: David Karnovsky	Applicant's Administrator: David Karnovsky
Application # N210418ZCM	Borough: Manhattan
CEQR Number: 21DCP057M	Validated Community Districts: M05

Docket Description:

Please use the above application number on all correspondence concerning this application

RECOMMENDATION: Conditional Favorable

Please attach any further explanation of the recommendation on additional sheets as necessary

CONSIDERATION:

Recommendation submitted by	MN BP	Date: 8/19/2021 3:03 PM
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BOROUGH PRESIDENT RECOMMENDATION

Project Name: 175 Park Avenue	
Applicant: David Karnovsky	Applicant's Administrator: David Karnovsky
Application # N210419ZCM	Borough: Manhattan
CEQR Number: 21DCP057M	Validated Community Districts: M05

Docket Description:

Please use the above application number on all correspondence concerning this application

RECOMMENDATION: Conditional Favorable

Please attach any further explanation of the recommendation on additional sheets as necessary

CONSIDERATION:

Recommendation submitted by	MN BP	Date: 8/19/2021 3:03 PM
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BOROUGH PRESIDENT RECOMMENDATION

Project Name: 175 Park Avenue	
Applicant: David Karnovsky	Applicant's Administrator: David Karnovsky
Application # N210416ZRM	Borough: Manhattan
CEQR Number: 21DCP057M	Validated Community Districts: M05

Docket Description:

Please use the above application number on all correspondence concerning this application

RECOMMENDATION: Conditional Favorable

Please attach any further explanation of the recommendation on additional sheets as necessary

CONSIDERATION:

Recommendation submitted by	MN BP	Date: 8/19/2021 3:03 PM
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OFFICE OF THE PRESIDENT
BOROUGH OF MANHATTAN
THE CITY OF NEW YORK

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Gale A. Brewer, Borough President

August 19, 2021

**Recommendation on ULURP Application Nos. N210416ZRM, C210414ZSM,
C210415ZSM, C210413ZSM, C210417PPM, N210418ZCM, N210419ZCM, N210420LDM,
and C210412ZSM
175 Park Avenue by Commodore Owner, LLC**

PROPOSED ACTIONS

Commodore Owner, LLC (“the Applicant”), a joint venture formed by RXR Realty and TF Cornerstone, is seeking approval for the following actions:

- Disposition of a City-owned property;
- Special permit pursuant to ZR 81-621 to allow hotel use;
- Special permit pursuant to ZR 81-644 to allow for a floor area increase in exchange for providing transit improvements;
- Special permit pursuant to ZR 81-645 to allow for a floor area increase in exchange for improvements to a public concourse;
- Special permit pursuant to ZR 81-685 to allow modifications to qualifying site, floor area, street wall, height and setback, district plan elements, publicly accessible space, Open Space & and special permit regulations; and
- Zoning text amendments to ZR 81-613, 81-644, 81-645, and 81-685.

These actions would apply to a proposed qualifying site that contains both the Grand Central Terminal and the Grand Hyatt New York Hotel (the “Qualifying Site”). The Applicant proposes to redevelop a portion of the Qualifying Site, which is currently occupied by the Grand Hyatt New York Hotel (the “Development Site”). Both the Qualifying and Development Sites are located in Manhattan Community District 5.

BACKGROUND

East Midtown Rezoning ¹

The City Council approved the Greater East Midtown rezoning on August 9, 2017. The goals of that rezoning were to allow for the redevelopment of older office space within the central business district while furthering transit and public and open space improvements. The East Midtown Subdistrict includes the following elements:

- Transfer of unused development rights from landmarks to development sites across the district;
- A Public Realm Improvement Fund contribution requirement for developments receiving development rights from landmarks;
- Increase in FAR for qualifying sites in exchange for subway station improvements; and
- Increase in FAR for qualifying sites in exchange for creating an accessible public concourse.

Area Context

The Development Site is located within the East Midtown Subdistrict of the Special Midtown District. East Midtown is occupied by large scale office buildings, many of which include privately owned publicly accessible spaces. The area plays an integral role in the economy of the New York metropolitan region. In addition to its importance as a business center, East Midtown is also world-renowned for its iconic architecture, significant civic spaces, and extensive transportation system—all of which are exemplified by Grand Central Terminal at the heart of the Subdistrict.

The Park Avenue portion of East Midtown is lined with office building entrances, with some ground-level storefront banks. Lexington Avenue, Madison Avenue and East 42nd Street are the main commercial corridors in the area, containing a variety of establishments to service the area's workers.

Major infrastructure projects, such as the East Side Access tunnel and the Second Avenue Subway, will create new options for commuters to access the region while hopefully alleviating congestion on the Lexington Avenue line.

PROPOSED DEVELOPMENT

Site Description

The Applicant is requesting to use a qualifying site that contains two zoning lots. The first, Zoning Lot 1, contains the Grand Hyatt New York Hotel, a 26 story hotel (the “Development Site”). The second, Zoning Lot 2, contains Grand Central Terminal, an individual and interior

¹ N170186ZRM. Enacted by the City Council on August 9, 2017.

landmark. This Qualifying Site would contain a total of 203,872 square feet. This larger size would result in an increase in the floor area bonused to the Development Site and allow the Applicant to implement broader transit and public realm improvements.

The Qualifying Site is located on the southern portion of Manhattan Block 1280, which is bounded by Vanderbilt Avenue, Lexington Avenue, East 45th Street, and East 42nd Street. The site is located in a C5-3 zoning district and is within the Grand Central Transit Improvement Zone Subarea of the East Midtown Subdistrict.

In 1977, the State adopted a General Project Plan (GPP) to renovate the Commodore Hotel and entered into a 99-year ground lease with a developer who redeveloped the Commodore into the Grand Hyatt. The disposition action that is part of this application would effectively amend and extend the existing ground lease.

Project Description

The Applicant is proposing a 1,642-foot tall commercial building containing 85 stories and 2.25 million square feet of floor area (11.02 FAR). The proposed building would include a 500 room hotel, 1.83 million square feet of class-A office space, and retail space on the first three floors.

The Applicant also proposes the following transit and public realm improvements

- Construct a below-grade connection between Long Island Railroad (and in the future East Side Access), Metro North, and the subway. This connection, which would eliminate the need for passengers to travel up one level before having to come back down to make a connection, would be known as the “Short Loop”;
- Renovate the Lexington Passage, including increasing the height of the corridor;
- Construct a new transit hall that connects Lexington Passage, 42nd Street Passage and the subway;
- Renovate the 42nd Street subway entrance, including making it wider and more visible from the street level and relocating the passenger elevator;
- Construct a new, weather-protected subway entrance at Lexington Avenue; and
- Construct three elevated terraces that would contain a combined 25,000 square feet of open air public space².

The Applicant also proposes to use about 618,000 square feet of development rights from Grand Central Terminal, which would result in an approximately \$38 million contribution to the East Midtown Public Realm Improvement Fund. The floor area bonus resulting from the transit improvements would total 611,616 square feet while the bonus resulting from the public concourse would be 259,224 square feet.

² One of the terraces, the Chrysler Terrace, is being proposed pursuant to ZR 81-681(b), which requires the site to include a public space that is open to the sky and is at least 10,000 square feet in size.

Zoning Text Amendments

In order to facilitate the proposed building, the Applicant proposes the following amendments to the Zoning Resolution:

- ZR 81-613: amend the definition of “Public Realm Improvement Fund” to facilitate the \$38 million payment that would result from the purchase of the Grand Central Terminal development rights;
- ZR 81-644: amend the transit improvement special permit to clarify that improvements to a rail mass transit facility (in this case the Grand Central Terminal) qualifies for the floor area bonus. This change would facilitate the construction of the Short Loop;
- ZR 81-645: amend the public concourse special permit to allow the Applicant to seek a waiver to provide seven loading berths instead of the required nine. This change is requested in order to facilitate the interconnected, three terrace design that they have proposed; and
- ZR 81-685: allow both zoning lots to be considered a single, qualifying site. This would allow the proposed building to benefit from bonuses generated by both the transit improvements and public concourse. The Applicant also seeks to extend the time in which they are required to complete substantial construction of the proposed building and improvements, from four years to up to ten years prior to the expiration of the special permit.

COMMUNITY BOARD RECOMMENDATION

On July 8, 2021 Manhattan Community Board 5 voted to recommend approval of the application, with the following conditions:

1. Restrict the proposed text amendments so they only apply to this site, including limiting the FAR bonus to the 4.27 that the proposed building will use;
2. Exclude Depew Place from FAR calculations;
3. Redesign the massing of the proposed building to allow more daylight on Lexington Avenue;
4. Include more retail on East 42nd Street; and
5. Ensure that the restrictive declaration, which will include requirements for the public terraces, is negotiated with Community Board 5, including the terms that outline hours of public access, wayfinding, seats, trees, lighting, security, maintenance, sanitation, and arts and cultural uses.

In its resolution, the Board noted its preference for keeping the terraces accessible to the public 18 hours a day and 7 days a week.

BOROUGH PRESIDENT'S COMMENTS

The building proposed by the Applicant brings together the overarching goals of the East Midtown Rezoning. While providing class-A office space and amenities for office users in the area, the building plan also includes extensive public space and transit improvements that will reach beyond the district. The location of the Development Site above rail infrastructure provides a unique opportunity to reimagine pedestrian circulation and to design corridors that are inviting to the public and admit increased daylight. When I first met with the Applicant team many months ago, I suggested that they consider an elevated public space and noted the success of the stairs and elevated area in front of the New York Public Library's main branch. I believe the proposed design of the terraces, which includes two large staircases rising above East 42nd Street, achieves a striking design that will draw not only workers in the area, but also visitors from outside the district.

Furthermore, I am pleased to learn that the development team is working on including public arts and cultural programming for its public spaces by partnering with the Public Art Fund and Lord Cultural Resources. The Applicant has represented that all three terraces will have rotating art installations, which will help ensure that the public feels welcome. I agree with Community Board 5 that these spaces should be closed only for overnight maintenance and remain open 18 hours a day, 7 days a week.

BOROUGH PRESIDENT RECOMMENDATION

Therefore, the Manhattan Borough President recommends approval of ULURP Application Nos. N210416ZRM, C210414ZSM, C210415ZSM, C210413ZSM, C210417PPM, N210418ZCM, N210419ZCM, N210420LDM, and C210412ZSM with the following conditions:

1. That the Applicant change the proposed zoning text amendment so that the FAR bonused on the site will only include the 4.27 FAR that the proposed building would necessitate; and
2. That the restrictive declaration include a requirement that the outdoor terraces only be closed overnight to accommodate the necessary cleaning, maintenance, and security needs.

A handwritten signature in black ink that reads "Gale A. Brewer". The signature is fluid and cursive, with the first letters of each word being capitalized and prominent.

Gale A. Brewer
Manhattan Borough President



COMMUNITY/BOROUGH BOARD RECOMMENDATION

Project Name: 175 Park Avenue	
Applicant: David Karnovsky	Applicant's Primary Contact: David Karnovsky
Application # N210416ZRM	Borough:
CEQR Number: 21DCP057M	Validated Community Districts: M05

Docket Description:

Please use the above application number on all correspondence concerning this application

RECOMMENDATION: Conditional Favorable			
# In Favor: 35	# Against: 0	# Abstaining: 1	Total members appointed to the board: 48
Date of Vote: 7/8/2021 12:00 AM		Vote Location: 71 West 23rd Street	

Please attach any further explanation of the recommendation on additional sheets as necessary

Date of Public Hearing: 7/8/2021 6:00 PM	
Was a quorum present? Yes	<i>A public hearing requires a quorum of 20% of the appointed members of the board but in no event fewer than seven such members</i>
Public Hearing Location:	71 West 23rd Street

CONSIDERATION: CB5 Resolution Letter attached.

Recommendation submitted by	MN CB5	Date: 7/20/2021 12:11 PM
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Manhattan Community Board Five

Vikki Barbero, Chair

450 Seventh Avenue, Suite 2109
New York, NY 10123-2199
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Marisa Maack, District Manager

July 09, 2021

Marisa Lago
Chair of the City Planning Commission
22 Reade Street
New York, NY 10007

Re: Redevelopment of 175 Park Avenue, aka Project Commodore, currently the site of the Grand Hyatt New York Hotel at 109 East 42nd St.

Dear Chair Lago:

At the regularly scheduled monthly Community Board Five meeting on Thursday, July 08, 2021, the following resolution passed with a vote of 35 in favor; 0 opposed; 1 abstaining:

WHEREAS, Commodore Owner LLC, RxR, and TF Cornerstone are seeking multiple approvals to redevelop the Grand Hyatt New York Hotel, which prior to 1977 was known as the Commodore Hotel, and is located at the northwest corner of East 42nd Street and Lexington Avenue; and

WHEREAS, The Commodore/Grand Hyatt Hotel is a 26-story, 295-foot tall building with 1,300 guest rooms and 60,000 square feet of meeting/event space that was built in 1919 as a part of Terminal City, a designed neighborhood to surround Grand Central Terminal; and

WHEREAS, The development site is the 57,292 square foot lot located at the northwest corner of East 42nd Street and Lexington Avenue, and is bounded to its west by Grand Central Terminal and the Park Avenue viaduct; and is bounded to its north by the southern end of Depew Place and the Grand Central Market; and

WHEREAS, From 1977 to 1980, the Commodore Hotel was taken over by the State of New York under an urban redevelopment plan, renovated by the Trump Organization, and renamed by the Hyatt Corporation; and

WHEREAS, According to the 1977 redevelopment agreement, if the Hyatt Corporation were to break its 99 year lease with the New York State Urban Development Corporation for the Commodore Hotel site, ownership of the site would revert from the State back to the City of New York; and

WHEREAS, The developers, RxR and TF Cornerstone, have entered into an agreement with Hyatt Corporation for Hyatt to break its lease with the State and the developers have entered into

a new lease agreement with the site's new owner, the City of New York, that would give the developers the Right of First Offer if the City decides to sell the property in the future; and

WHEREAS, The developers wish to create a Qualifying Site by bundling the zoning lots of the 57,292 square-foot Hyatt lot with the already merged lots of Grand Central Terminal, Grand Central Market, and a portion of the Depew Place demapped street bed for a Project Area of 203,872 square feet, which will be the base number used to calculate bonus FAR for the proposed development; and

WHEREAS, The development site is located within a C5-3 zoning district, the Special Midtown District, the Greater East Midtown Subdistrict, the Grand Central Core Area, and the Grand Central Transit Improvement Zone Subarea, which allows for a base 15 FAR development as-of-right and up to 30 FAR with approvals for Special Permits for a public concourse and/or additional subway improvements; and

WHEREAS, The developers are purchasing around 515,000 square feet of transferable development rights (air rights) from Grand Central Terminal for a total of 1,477,625 square feet of As-of-Right development (or 25.79 FAR) on the Hyatt lot; and

WHEREAS, The developers will contribute almost \$30 million to the East Midtown Public Realm Fund, which is based on the amount of Transferable Development Rights that will be purchased from Grand Central Terminal; and

WHEREAS, The developers hope to use several special permits, waivers, and zoning text amendments to build a 39 FAR, 83-story, 1,646 foot tall tower that will contain 2.25 million square feet of space, including transit improvements, pedestrian circulation space, and public outdoor space; and

WHEREAS, The developers propose to complete the new tower, transit improvements, and public outdoor space by 2030 after 18 months of demolition and 47 months of construction; and

WHEREAS, The developers propose to pay for the following transit improvements:

1. Widen Grand Central Terminal's 42nd Street Passageway with a 10,000 square foot "Transit Hall"
2. Enlarge, redesign, and add a staircase to the R-238 Fare Control Area subway entrance/exit at Grand Central Terminal's 42nd Street Passageway
3. Build the "Short Loop Connection" that will provide a new subway entrance/exit under Grand Central Terminal, connecting the East Side Access platforms and MetroNorth lower-level platforms with the subway by utilizing an unused train tunnel and then connecting up to the subway mezzanine via a new stairs and elevator
4. Remove the girders that currently take up subway mezzanine floor space and are holding up the current Grand Hyatt Hotel; and

WHEREAS, According to the MTA, these transit improvements will improve the R-238 subway entrance/exit level of service from an E-grade to a C-grade and improve the 42nd Street Passageway from a D-grade level of service to an A-grade; and

WHEREAS, The developers also propose to pay for the following pedestrian and commuter circulation improvements:

1. Enlarge, redesign, and recess from the street wall the R-239 Fare Control Area entrance/exit at Lexington Avenue between 42nd and 43rd Streets
2. Renovate the R-240 Fare Control Area subway entrance/exit connecting to Grand Central Terminal's Lexington Avenue Passageway
3. Increase the height of Grand Central Terminal's Lexington Avenue Passageway
4. Widen the sidewalks adjacent to the building by 5 feet on both East 42nd Street and Lexington Avenue by recessing the building's street wall
5. Build an entrance/exit connecting the proposed tower's 2nd-floor Office Lobby to Grand Central Terminal's Lexington Passageway; and

WHEREAS, the developers also propose to build a 25,000 square foot public outdoor space of that will almost surround the tower at the 2nd-floor and 3rd-floor levels with two grand staircases connecting it to the East 42nd Street sidewalk and will include:

1. "Grand Central Terrace," an area adjacent to the Park Avenue viaduct on the west side of the tower, with trees, seating, and a large staircase to the 42nd Street sidewalk
2. "Chrysler Terrace," on the east side of the tower, the largest of the three terraces at 10,000 square feet, that has a small cafe, a water feature, trees, seating, glass railing overlooking Lexington Avenue, an elevator and staircase to the Lexington Avenue sidewalk, and a large staircase to the 42nd Street sidewalk that is symmetrical to the large staircase to the west terrace
3. "Graybar Terrace," along the north side of the tower, an upper-level (3rd-floor) space that has a large cafe with transparent walls, shrubbery, seating, and is accessible from the east and west terraces by stairs and elevators, including an elevator to the Lexington Avenue sidewalk; and

WHEREAS, The developers are seeking for all of these transit, circulation, and outdoor space improvements to make the Hyatt site eligible for an additional 4.27 FAR (or 870,840 square feet), based on the enlarged Qualifying Site's two zoning lots; and

WHEREAS, Community Board Five expresses its strong concerns that taken as a whole, the project's design may alter or obscure the important views of the iconic landmark structures of Grand Central Terminal as well as the Chrysler Building valued parts of the neighborhood community for all New Yorkers, which under current laws and procedures are not easily protected, and that these issues should be mitigated with a design that defers to the landmarks; and

WHEREAS, The East Midtown zoning requires hotel use to be supportive of neighborhood character of a premier business district, the developers also seek a Hotel Special Permit to have a 500-room hotel on the upper floors of the tower with a ground floor lobby fronting Lexington Avenue; and

WHEREAS, The developers also seek a Special Permit, several waivers, and several zoning text amendments to modify the street wall height, set back, and public space for a Qualifying Site in the following ways:

1. A text amendment to allow two or more contiguous zoning lots to be one Qualifying Site, if Grand Central Terminal is included as one of the bundled zoning lots

2. A text amendment to allow a Qualifying Site to have been already developed by less than 15 FAR, if Grand Central Terminal is included within the Qualifying Site's zoning lots
3. A text amendment to allow commuter rail projects and other projects not identified by the MTA to be eligible for East Midtown's Transit Improvement Bonus
4. A text amendment to change both the Transit Improvement Bonus maximum and the Public Concourse Bonus maximum from 3 FAR to 6 FAR
5. A waiver to allow the tower to setback from the street line and to allow for the irregular street wall caused by the sidewalk widening, public terraces, and grand staircases
6. A waiver to allow for the tower's massing not to comply with the minimum 66% Daylight Evaluation Score along Lexington Avenue
7. A waiver to allow for the developers to not calculate a Daylight Evaluation Score from the Park Avenue viaduct
8. A waiver to allow larger than permissible entrances to the site's lobbies, transit concourses, and public outdoor spaces
9. A waiver to not have any street-level retail on 42nd Street or Lexington Avenue
10. A waiver to not have the Publicly Accessible Space at ground-floor level
11. A waiver to not have the Publicly Accessible Space regulated under usual Public Plaza provisions, but rather under a Restrictive Declaration
12. A text amendment to allow East Midtown Special Permits to be extended for more than a four year term to complete substantial work
13. A waiver to allow a ten year term for substantial work to be completed at the Hyatt site; and

WHEREAS, The developers also seek comments on the design of the tower, Public Concourses, and Publicly Accessible Space to the Public Design Commission because the proposed development will be on City-owned land; and

WHEREAS, Although, in February 2021, Manhattan Community Board Five voted against the tower's design as creating a harmonious relationship with Grand Central Terminal's landmarked façade, the Landmarks Preservation Commission approved the tower's design as being harmonious; and

WHEREAS, Manhattan Community Board Five recognizes the unique location of the Hyatt zoning lot:

1. situated above the MTA's second busiest subway station (at least it was for many decades prior to the 2020 pandemic shutdowns)
2. contains the R-238 Fare Control Area: identified during the 2005 Hudson Yards Rezoning in the Environmental Impact Statement's list of needed mitigations to alleviate a commuter choke point
3. contains Grand Central Terminal's Lexington Passageway and adjacent to the heavily congested 42nd Street Passageway; and

WHEREAS, During the 2017 Greater East Midtown Rezoning process, Manhattan Community Board Five's advice to the Department of City Planning to include the Hyatt site as a possible redevelopment site went unheeded; and

WHEREAS, Manhattan Community Board Five agrees that the list of subway, commuter rail, and pedestrian circulation improvements proposed by the developers are robust, substantial, and long needed; and

WHEREAS, Manhattan Community Board Five agrees that both a Transit Improvement Bonus and a Public Concourse Bonus should be granted at this location; and

WHEREAS, Manhattan Community Board Five supports a Zoning Resolution text amendment to allow transit projects to be eligible for the East Midtown Transit Improvement Bonus that are not on the East Midtown MTA list of pre-identified subway projects; and

WHEREAS, Manhattan Community Board Five is not in favor of the proposed Zoning Resolution text amendment to change 81-64 Rows F and G from 3 FAR to 6 FAR each, which would allow for the maximum FAR bonus to double under East Midtown's Special Permits for Transit Improvements or Public Concourses and thus create a major incentive for bundling zoning lots into larger than necessary Qualifying Sites; and

WHEREAS, The Zoning Resolution currently allows for only one zoning lot to be evaluated as a Qualifying Site under East Midtown's regulations; and

WHEREAS, Manhattan Community Board Five is supportive of a Zoning Resolution text amendment that will allow for underdeveloped zoning lots, like Grand Central Terminal's zoning lot, to come together with one other contiguous zoning lot only to create a Qualifying Site, and Manhattan Community Board is against the proposed text amendment to allow two or more zoning lots to be bundled into a Qualifying Site, which would incentivize stacking larger amounts of FAR on to smaller development lots; and

WHEREAS, Manhattan Community Board Five supports the Zoning Resolution text amendment to remove the 15 FAR minimum condition for a Qualifying Site, as long as Grand Central Terminal is included within the bundle of two contiguous zoning lots; and

WHEREAS, Manhattan Community Board Five does not agree that demapped streets that are actively used by more than one zoning lot, like Depew Place, should be used in calculating FAR for a zoning lot or a Qualifying Site; and

WHEREAS, Manhattan Community Board Five finds it is appropriate to waive the street wall regulations to allow for the proposed setbacks due to sidewalk widening and creation of public outdoor spaces; and

WHEREAS, Manhattan Community Board Five finds it is appropriate for the grand staircases and office lobby entrance on East 42nd Street to exceed the normal regulations of 40 foot maximum width and 15 foot maximum depth with the proposed 56.2 feet width and 20.26 feet depth; and

WHEREAS, This proposed development design does not include street-level retail storefronts on East 42nd Street and Manhattan Community Board Five is not supportive of waiving the street-level retail requirement, which promotes a vibrant street life in the business district; and

WHEREAS, Manhattan Community Board Five would not like to see any waivers for meeting the minimum Daylight Evaluation Scores or waivers for calculating Daylight Evaluation Scores from the Park Avenue viaduct due to our district's history of development that diminishes Daylight in the district; and

WHEREAS, Manhattan Community Board Five finds it appropriate to waive the conditions for the Publicly Accessible Space for the "Chrysler Terrace" portion of the public outdoor space, so that space can be elevated to the second floor level and not at the required ground-level; and

WHEREAS, Manhattan Community Board Five was active in the Greater East Midtown Rezoning process and continuously noted the lack of high-quality, inviting, accessible, passive-use, outdoor public space in East Midtown; and

WHEREAS, Manhattan Community Board Five wants to continue the discussion with the developers and the Department of City Planning regarding the Restrictive Declaration that will govern the public outdoor spaces on the three terraces and two grand staircases; and

WHEREAS, Manhattan Community Board Five finds it is appropriate for a Zoning Resolution text amendment to allow the City Planning Commission to extend the four-year term of Special Permits in order for substantial work to be completed and finds that a ten-year term at the Grand Hyatt site is appropriate; and

WHEREAS, Manhattan Community Board Five finds that the proposed hotel at this location is appropriate; and

WHEREAS, Manhattan Community Board Five has no objection to the City of New York entering into an agreement which will allow the City to reacquire ownership of the development site, and if the City sells the lot, to give the developers the Right of First Offer; therefore be it

RESOLVED, Manhattan Community Board Five **approves with strict restrictions** the application by 175 Park Avenue for the many Special Permits, Zoning Resolution text amendments, waivers, public designs, and the disposition of City-owned property with the following conditions:

1. All text amendments should be restrictive to allow for the proposed conditions at this particular site and exceed them:
 1. two contiguous zoning lots may be evaluated as a Qualifying Site (not the proposed "two or more zoning lots"), as long as one of the two zoning lots includes Grand Central Terminal
 2. the maximum bonuses for the Transit Improvement Special Permit and the Public Concourse Special Permit are limited to a combined 4.27 FAR (not the proposed "6 FAR")
2. Depew Place square footage within a Qualifying Site is not included in FAR calculations, because it is an actively-used roadway by multiple zoning lots and the 175 Park Avenue proposal demands access to that roadway
3. The massing of the proposed tower should be shifted to allow more Daylight on Lexington Avenue
4. More retail should be on East 42nd Street, possibly located under the grand staircases
5. The terms of the Restrictive Declaration regarding the public outdoor spaces (the terraces and staircases that are a part of the Public Concourses and Publicly Accessible Space) should be

negotiated with the Community Board and written before the City Planning Commission and Public Design Commission approves any Special Permits, waivers, and designs for the Publicly Accessible Space, especially the terms for:

1. Hours the public can access the space, hopefully as much as 18 hours a day, 7 days a week
2. Signage, especially elevator access from the street-level of the grand staircases
3. Lighting design
4. Number of seats
5. Number of trees
6. Public art installations & rotation
7. Security, maintenance, and sanitation
8. Restrictions on private use and media events
9. Community, cultural, and educational uses

Thank you for the opportunity to comment on this matter.

Sincerely,



Vikki Barbero
Chair



Layla Law-Gisiko
Chair, Land Use, Housing and Zoning Committee
Committee



E.J. Kalafarski
Chair, Transportation/Environment

CC: Hon. Corey Johnson, New York City Council Speaker
Hon. Brad Hoylman, New York State Senator, 27th District
Hon. Keith Powers, Councilmember, District 4
Manhattan Borough President, Gale Brewer
Members of the City Planning Commission: [Kenneth J. Knuckles, Esq., Vice Chair](#),
[David J. Burney](#), [Allen P. Cappelli](#), [Alfred C. Cerullo, III](#), [Michelle de la Uz](#), [Joseph Douek](#),
[Richard W. Eaddy](#), [Hope Knight](#), [Anna Hayes Levin](#), [Orlando Marín](#), [Larisa Ortiz](#),
[Raj Rampershad](#)
Sarah Carroll, Chair, Landmarks Preservation Commission



**WRITTEN TESTIMONY FROM THE ASSOCIATION FOR A BETTER NEW YORK SUBMITTED TO THE
CITY PLANNING COMMISSION REGARDING 175 PARK**

September 1, 2021

Thank you for the opportunity to submit written testimony on behalf of the Association for a Better New York (ABNY). My name is Melva M. Miller, and I am the Chief Executive Officer of ABNY. ABNY is a nonprofit organization dedicated to the healthy growth and renewal of New York City's people, businesses, and communities. We are a 50-year-old civic organization representing corporations, nonprofits, unions, government authorities, and educational, cultural, and health institutions. We strive to promote connections between the public and private sectors to make New York City a better place to live, work, and visit for all.

The development at 175 Park will help New York City in its recovery from the COVID-19 pandemic, not only in terms of providing good paying jobs, but also for creating open space and implementing transit improvements that the neighborhood—and all New Yorkers—need. This proposed development is estimated to generate more than 24,000 jobs, achieve \$1.8 billion in earnings, and provide an annual output of roughly \$3.8 billion in New York City's economy.

Beyond the modern, Class A office space proposed, the project will provide approximately 25,000 square feet of elevated, publicly accessible space that provides new vantage points to take in Grand Central Terminal, the Chrysler Building, and other Midtown icons, as well as space for public programming and activities delivering huge value for workers, residents, and tourists alike.

The transit improvements proposed for Grand Central Terminal and the Grand Central-42nd Street subway station will ease crowding, improve ADA accessibility, and provide new intermodal connections between commuter rails and subway. The new transit hall, dedicated subway entrance, expanded connections to the 42nd Street Passage, and new fare control area relocated at street level will fundamentally improve the experience for transit passengers and commuters.

This project signals that New York is open for business and ready to meet the demands of the modern workforce in the wake of the global pandemic. We support the actions necessary to make this transformational project a reality.

Thank you so much for your consideration.

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September 1, 2021

TESTIMONY TO THE NEW YORK CITY PLANNING COMMISSION, REGARDING 175 PARK AVE CEQR#21DCP057M

To the Commissioners of the City Planning Commission, the New York Building Congress is pleased to testify in support of the 175 Park Ave proposal in Midtown Manhattan. The Building Congress has, for 100 years, advocated for investment in infrastructure, pursued job creation and promoted preservation and growth in the New York City area. Our association is made up of over 525 organizations comprised of more than 250,000 skilled professionals and tradespeople. Through our members, events and various committees, we seek to address the critical issues of the building industry and promote the economic and social advancement of our city and its constituents.

We believe 175 Park Avenue is the right type of investment for New York at this critical moment in history. Our road to recovery must follow a path based on public and private investments that will build New York back better and have an impact that can be felt across the five boroughs. As New York rebuilds following the COVID-19 pandemic, the building industry will provide an immediate and essential boost to the economies of our city and state while bringing thousands of people back to work, as evidenced by the fact that construction spending was \$61 billion in 2019 and is a key driver of employment throughout the metropolitan area. We are proud to support 175 Park Ave as it will generate more than 18,000 construction jobs, equating to \$1.5 billion in earnings during the construction phase, and provide an annual economic impact of \$7.9 billion to the city's economy after completion.

175 Park Ave is a milestone in the continued evolution of one of New York's most iconic neighborhoods – delivering on the promise of the East Midtown Rezoning and responding appropriately to Grand Central Terminal. The design responds to Grand Central's role as a catalyst for density, which was first demonstrated in the historic vision for Terminal City and more recently through the East Midtown Rezoning.

Much like One Vanderbilt, 175 Park Avenue will replace an outdated structure with a new, sustainable tower that provides for significant private investment in public infrastructure. The project will deliver large-scale improvements to the streetscape and transportation network that enhance circulation, reduce congestion and provide for additional ADA accessibility. It will also create a brand-new transit hall, a new dedicated subway entrance, expanded connections to the 42nd Street Passage and a new fare control area relocated at street level. In short, the experience of commuting to and from Grand Central Station will be greatly improved.

Moreover, 175 Park Avenue will add significantly more public open space to the Grand Central area. Approximately 25,000 square feet of public plazas starting on the viaduct level will open Grand Central's eastern façade to the public and finally allow New Yorkers and visitors alike to appreciate Grand Central up close. The project will also provide new vantage points to the Chrysler Building and other Midtown icons. There will also be new opportunities to accommodate a wide range of programming and activities to ensure the public space provides real benefits to the local community.

In closing, 175 Park Avenue echoes the ethos of Grand Central and the neighborhood. It respectfully increases density by transforming an underused site into a state-of-the-art building and enhances the public realm with transit improvements and new open space. The Building Congress proudly supports this project, and we urge you to approve 175 Park Avenue – a key step in the reimagining of East Midtown.

Very truly yours,

A handwritten signature in black ink, appearing to read 'Carlo Scissura'.

Carlo A. Scissura, Esq.
President & CEO
New York Building Congress



BUILDING & CONSTRUCTION TRADES COUNCIL OF GREATER NEW YORK

GARY LaBARBERA
PRESIDENT

— AFFILIATED WITH THE
BUILDING CONSTRUCTION TRADES DEPARTMENT
OF WASHINGTON, DC —
BUILDING AND CONSTRUCTION TRADES COUNCIL
OF NEW YORK STATE —
AMERICAN FEDERATION OF LABOR OF CONGRESS
OF INDUSTRIAL ORGANIZATION

TESTIMONY

On behalf

BUILDING AND CONSTRUCTION TRADES COUNCIL OF GREATER NEW YORK AND VICINITY

In Support of the Grand Hyatt Project at 175 Park Avenue

September 1, 2021

Good morning. I am Davon Lomax, I am here to testify on behalf of Gary LaBarbera, President of the Building and Construction Trades Council of Greater New York & Vicinity, and I am here to testify in support of the Grand Hyatt project at 175 Park Avenue.

The Building and Construction Trades Council is an organization of local building and construction trade unions that are affiliated with 15 International Unions in the North American Building Trades Union. Our local union affiliates represent approximately 100,000 union construction workers. The Building Trades mission is to raise the standard of living for all workers, to advocate for safe work conditions and to collectively advance working conditions for our affiliates' members, as well as all workers in New York City.

175 Park Avenue will create new public open space in midtown and improve the transportation infrastructure around Grand Central station. RXR and TF Cornerstone's proposed redevelopment will create thousands of permanent jobs as well as construction jobs that will provide a steady paycheck and benefits. The construction of this project itself will create opportunities for New Yorkers of all walks of life through our Apprenticeship Readiness Collective. The programs within the Apprenticeship Readiness Collective provide entry level access to work in the construction industry, training, and preparation for a career and a future in construction work. For individuals to participate in these programs, there needs to be construction work to perform. The development of the Grand Hyatt project will provide opportunities for New Yorkers throughout our City to begin a career in construction and generate an influx of economic activity to the City at an important time.

New Yorkers need jobs to make ends meet; the city needs investment to drive recovery; and there are few better ways to catalyze both than by building. Construction is a critical source of good-paying, stable jobs. The Building and Construction Trades Council of Greater New York and Vicinity supports projects like the Grand Hyatt project that will improve the lives of many New

Yorkers, expand capacity and improve transportation infrastructure, and create middle class jobs for our members in the process.

We thank you again for this opportunity to testify in support of this project.

Re. Project: **C 210412 ZSM - 175 Park Avenue**

- Application Number: **C 210412 ZSM**
- Project: **175 Park Avenue**
- Public Hearing Date: **09/01/2021**
- Borough: **Manhattan**
- Community District: **5**

Submitted by:

Name: **Anne Trenkle**

Zip: **10001**

I represent:

- **Other**

Details for "I Represent":

My Comments:

Vote: I am **in favor**

Have you previously submitted comments on this project? **No**

If yes, are you now submitting new information? **No**

I have attended or will attend the City Planning Commission's Public hearing on this project: **Yes**

Additional Comments:

I am testifying in favor of this project and what it means to our veteran community for Union construction apprenticeship opportunities.

From: [Katherine Glass \(DCP\)](#)
To: [David Velez](#)
Subject: [External] Fw: Comments re: C 210412 ZSM - 175 Park Avenue
Date: Tuesday, August 31, 2021 3:55:40 PM

Hi David, please see below for the MAS's comments on 175 Park.

From: Public Hearing Comments (Do not reply) <PublicComments_DL@planning.nyc.gov>
Sent: Tuesday, August 31, 2021 3:08 PM
To: Ezra Moser (DCP) <EMOSER@planning.nyc.gov>; Katherine Glass (DCP) <KGlass@planning.nyc.gov>; ManhattanComments_DL <ManhattanComments_DL@planning.nyc.gov>
Subject: Comments re: C 210412 ZSM - 175 Park Avenue

Re. Project: **C 210412 ZSM - 175 Park Avenue**

- Application Number: **C 210412 ZSM**
- Project: **175 Park Avenue**
- Public Hearing Date: **09/01/2021**
- Borough: **Manhattan**
- Community District: **5**

Submitted by:

Name: **Thomas Devaney**
Zip: **10022**

I represent:

- **A local community group or organization**

Details for "I Represent": **The Municipal Art Society of New York**

My Comments:

Vote: I am **opposed**

Have you previously submitted comments on this project? **Yes**
If yes, are you now submitting new information? **Yes**

I have attended or will attend the City Planning Commission's Public hearing on this project:
No

Additional Comments:

MAS Comments on the Draft Environmental Impact Statement for 175 Park Avenue—CEQR No. 21DCP057M August 31, 2021 The magnitude of RxR and TF Cornerstone's 175 Park Ave tower has the potential to forever alter the Grand Central Terminal area and the iconic NYC skyline. While the redevelopment of the outdated Grand Hyatt site is most welcome, and the proposed pedestrian and transit improvements much needed, the Municipal Art Society (MAS) fears the tower's height (1,646 feet—second to One World Trade Center) and bulk (nearly three million square feet) may overwhelm this important area of the city and Grand Central Terminal itself. With these concerns in mind, we have several comments on the proposal and questions that require further clarification and disclosure for the project to be examined comprehensively.

Historic & Cultural Resources While we view the building's street level setbacks on 42nd Street and Lexington Avenue as an improvement from current conditions, the building's imposing bulk would overwhelm the area and obscure nearby historic and visual resources, of which there are many. Twenty-one historically significant resources are clustered within 400 feet of the development's project area including Grand Central, the Chrysler Building, the Graybar Building, the MetLife Building, and the Chanin Building, to name but a few. The project Draft Environmental Impact Statement (DEIS) depicts a significant difference between the No-Action and With-Action development view east on 42nd Street from the New York Public Library. The former view shows a portion of the Chrysler Building still visible; in the latter, it is entirely obscured by the proposed building's bulk. The DEIS also depicts the dramatic impact the building would have on the iconic NYC skyline from Long Island City, wherein it would completely dominate surrounding buildings. Despite these impacts, the DEIS concludes that the development would have no significant adverse impact on surrounding historic and visual resources. Moreover, the renderings in the DEIS are woefully simplistic and inadequate for a project of this scale, as they lack sufficient detail and fail to give a sense of the building's visual presence from vantage points around the New York City area other than Long Island City. MAS requests that the FEIS include 1) more detailed drawings so that the public might better assess the tower's design, 2) additional views of the building from afar (including from Brooklyn, the Bronx, and New Jersey), and 3) a proposal for a scaled-down alternative that, like One Vanderbilt, tapers much more dramatically through the middle and the top of the structure.

Open Space The additional 5,000 square feet of open space added to the proposal since the release of the DEIS will result in over 25,000 square feet of privately owned public space, much, if not all of it distributed among three elevated terraces on the east, west, and north sides of the building. However, it is unclear what the impetus was for the addition and how and where the added 5,000 square feet would be allocated. Moreover, MAS is concerned that Graybar Terrace in particular will be heavily shadowed, windswept, and rendered unappealing due to its walled-in location between 175 Park Avenue and the Graybar Building. And while we acknowledge engineering obstacles make ground-floor plazas difficult for this project, we are not convinced that the casual passerby will even be aware that the second floor terraces are publicly accessible. To address these issues, MAS requests that the FEIS include 1) specific details on where the 5,000 square feet of additional open space will be allocated, 2) shadow and wind evaluations for project-generated open spaces as well as a daylight evaluation (as is required per Special Midtown District zoning), and 3) a detailed signage plan that clearly indicates that the terraces are a part of the public realm.

Conclusion New commercial development at 175 Park Avenue is appropriate and has the potential to bring substantial economic, transit, and public space benefits to the city. However, we have outstanding concerns about the building's potential overwhelming effect on area landmarks and the functionality of its public spaces. We look forward to a more thorough and transparent evaluation of such matters in the FEIS

Comments re: C 210412 ZSM - 175 Park Avenue

Public Hearing Comments (Do not reply) <PublicComments_DL@planning.nyc.gov>

Wed 9/1/2021 12:38 PM

To: Ezra Moser (DCP) <EMOSER@planning.nyc.gov>; Katherine Glass (DCP) <KGlass@planning.nyc.gov>;
ManhattanComments_DL <ManhattanComments_DL@planning.nyc.gov>

Re. Project: **C 210412 ZSM - 175 Park Avenue**

- Application Number: **C 210412 ZSM**
- Project: **175 Park Avenue**
- Public Hearing Date: **09/01/2021**
- Borough: **Manhattan**
- Community District: **5**

Submitted by:

Name: **Adira Siman**

Zip: **10004**

I represent:

- **A local community group or organization**

Details for "I Represent": **Partnership for New York City**

My Comments:

Vote: I am **in favor**

Have you previously submitted comments on this project? **No**

If yes, are you now submitting new information?

I have attended or will attend the City Planning Commission's Public hearing on this project: **No**

Additional Comments:

Thank you, Chair Lago and members of the commission for the opportunity to testify in support of the proposed development at 175 Park Avenue. The Partnership for New York City represents private sector employers of more than one million New Yorkers. We work together with government, labor and the nonprofit sector to maintain the city's position as the preeminent global center of commerce, innovation and economic opportunity. Projects like 175 Park Avenue will be important to the rebirth of New York City's economy after the downturn caused by COVID-19. In the short term, the development is expected to generate more than 24,000 construction jobs, an industry where 27% of workers earn

more than \$80,000 and where employment is 17% below pre-pandemic levels. Development of the next generation of commercial space in the midtown east area is critical to the city's recovery and to restoring utilization of a key transit hub. 175 Park Avenue would create new office space and make substantial improvements to transit, specifically to Grand Central Terminal (GCT) and the Grand Central-42nd Street subway station. These improvements would include new and improved entrances to GCT and the subway, a new transit hall and increased accessibility for disabled travelers. The development of 175 Park Avenue would encourage the revitalization and improvement of midtown by creating new open spaces. The project would include approximately 25,000 square feet of elevated, publicly accessible space with views of GCT and the Chrysler Building. In addition, two large staircases on 42nd Street and multiple accessible elevators would lead to a series of interconnected public terraces that wrap around the eastern, northern, and western sides of the building. These new spaces could allow for a range of programming and public activities that would benefit the area. We urge you to approve 175 Park Avenue.

Re. Project: **C 210412 ZSM - 175 Park Avenue**

- Application Number: **C 210412 ZSM**
- Project: **175 Park Avenue**
- Public Hearing Date: **09/01/2021**
- Borough: **Manhattan**
- Community District: **5**

Submitted by:

Name: **Shi Greene**

Zip: **11215**

I represent:

- **A local community group or organization**

Details for "I Represent": **Pathways To Apprenticeship**

My Comments:

Vote: I am **in favor**

Have you previously submitted comments on this project? **No**

If yes, are you now submitting new information?

I have attended or will attend the City Planning Commission's Public hearing on this project:

Additional Comments:

Good morning. My name is Shi Greene, I am the Executive Director of Pathways To Apprenticeship. Please excuse me as I tried to testify via zoom but was picked off once promoted as a panelist. What we do at Pathways To Apprenticeship is provide a second chance for those with criminal records who have been severely affected by the criminal justice system. Our role in the community for the last 8 years has been assisting with placing these justice involved individuals as well as those affected by low income here in NY with getting in to union construction trades careers. These opportunities have lowered the numbers of recidivism, created a sturdy and steady bridge to middle class and provided families with Healthcare benefits that we have all been in dire need of considering the recent public health crisis and economic shutdown. For this reason I am in full support of this project and hope to see many more projects that will continue to strengthen New Yorkers economically Best Regards Shi Greene

REBNY Testimony | September 1, 2021

The Real Estate Board of New York to The City Planning Commission Concerning Application Nos. C 210412 ZSM, C 210413 ZSM, C 210414 ZSM, C 210415 ZSM, N 210416 ZRM, C 210417 PPM, N 210418 ZCM, N 210419 ZCM and N 210420 LDM (CEQR No. 21DCP057M) – 175 Park Avenue

The Real Estate Board of New York (REBNY) is the City's leading real estate trade association representing commercial, residential, and institutional property owners, builders, managers, investors, brokers, salespeople, and other organizations and individuals active in New York City real estate. REBNY supports the approval of the zoning text amendment, special permit, certifications and disposition of City-owned property at 175 Park Avenue, in the Borough of Manhattan (ULURP Nos. C 210412 ZSM, C 210413 ZSM, C 210414 ZSM, C 210415 ZSM, N 210416 ZRM, C 210417 PPM, N 210418 ZCM, N 210419 ZCM, and N 210420 LDM– CEQR No. 21DCP057M).

The proposal offers significant benefits to both the neighborhood and the City at large, including significant public realm improvements, and subway and mass transit improvements to enhance circulation and reduce congestion at Grand Central Terminal, as well as job opportunities in the form of construction, retail and office jobs that will aid in the City's economic recovery.

The project would substantially advance the goals of the Subdistrict to facilitate development of modern office towers at a key location, improve mass transit circulation and public space.

A principal goal of the Greater East Midtown rezoning was to increase the amount of new Class-A office space in the area. The proposed development will add significant office space to a uniquely transit-rich location adjacent to Grand Central Terminal and signal forward momentum in recovery efforts from the COVID-19 pandemic. The development would include approximately 2,108,820 gsf of new office space, a significant upgrade compared to current office space in the area, which has an average age of 75 years. This office space would address the Subdistrict's stated goal of preserving the neighborhood as a premiere business address and key job center for the City and Region. The development would result in 24,000 construction jobs and thousands of office jobs. These jobs are not just an asset to our economy, they support the City's goal of job growth in close proximity to public transit.

The project affords an unprecedented opportunity to make significant transit and public realm improvements at the site. The proposal will facilitate improvements to existing subway entrances, a new transit hall, increased sidewalk capacity, upgraded signage and new intermodal connections to improve circulation. Further, the approximately 25,000 square feet of high quality, ADA accessible public spaces in the form of three public open spaces located around the perimeter of the development site would provide significant public amenities and improve the working and living environment of the area for residents, workers, and tourists alike, consistent with the goals of the Subdistrict.

The Landmarks Preservation Commission has previously weighed in on the application and found that the proposed development would have a harmonious relationship with Grand Central Terminal. Today, the City Planning Commission (Commission) is considering the project from the perspective of whether it would further the City's planning and land use development goals for the East Midtown Subdistrict. Our answer is an unqualified "Yes." The Commission should approve this application. Thank you for the consideration of these comments.

CONTACT:

MADELEINE MCGRORY

Senior Policy & Planning Analyst
Real Estate Board of New York

212-616-5222
mmcgrory@rebny.com



Testimony of Betsy Plum, Executive Director

175 Park Avenue CPC Hearing

September 1, 2021

Good morning, I am Betsy Plum, Executive Director of the Riders Alliance. We are a New York based grass-roots membership organization of subway and bus riders dedicated to building a more just and sustainable New York by holding government officials accountable for safe, reliable, and affordable public transit.

As an organization of New Yorkers committed to an equitable vision for our city, the Riders Alliance supports various projects and policies that will have a direct impact on the City's transit infrastructure. This work fits with our overall approach to organizing and advocating for a reliable, affordable, sustainable and world-class public transit system.

We believe that the redevelopment of the Grand Hyatt Hotel will unlock future transit upgrades and enhance the experience for riders and commuters in and around Grand Central. We're encouraged by the proposed changes, including enhancing pedestrian flow at the 42nd Street station for the aging 4/5/6 subway line with its narrow, confusing entrances and overcrowded platforms.

The enhanced entrances and improved pedestrian flow throughout will provide more physical space between passengers in one of the busiest train stations in the nation, an adjustment more necessary now than ever before. Based on conversations with our members and rider surveys, we understand that New Yorkers are quite reasonably reluctant to return to overcrowded conditions in public transit for a long time to come.

To ensure commuter comfort and access, we also support the building's proposed use for a variety of multimodal transportation options and enhancements to the public realm. As part of an equitable recovery from COVID, New York City transit riders deserve efficient and accessible transportation options. The redevelopment of the Grand Hyatt advances those crucial goals.

Thank you.

September 01, 2021

City Planning Commissioners,
NYC Dept Of City Planning
120 Broadway
New York, NY

RE: 275 Park Ave

Dear Commissioners,

I'm writing in support of the proposed public spaces and urbanism of the 175 Park Avenue project.

From an urbanistic position the proposed building at 175 Park Avenue shows a carefully thought out and sensitive relationship to the Grand Central Terminal, which for too long has had its eastern façade hidden from the public by an adjoining building. By pulling the new building away from the eastern facade of the Grand Central Terminal, 175 Park Avenue makes it possible to experience the Terminal as a free-standing Beaux Arts object building.

From my perspective the gift of creating publicly accessible open spaces at the level of the Grand Central Viaduct and wrapping all four sides of the proposed new structure with an elevated landscaped terrace promises to be a game changer in providing much needed green space along the Madison Avenue corridor and its intersection with 42nd Street. The architectural gesture of reinforcing the datum of the Viaduct at the base of the new building is effective in extending the base of the Grand Central Terminal all the way from Vanderbilt to the corner of Lexington and around the corner to the Graybar building. The elevated position of these proposed open spaces, with landscape, seating and respite will provide vantage points for viewing and experiencing the area's cityscape in a new way.

Although not part of this project, per se, the proposed design also opens up the possibility to dream of a future when the entire Viaduct might become a car-free public open space knitting together this part of the city into a broader public realm experience.

Thank you for the opportunity to express my opinion,



Ken Smith
FASLA

Tri-State Transportation Campaign comments on Project Commodore/Grand Hyatt
9/1/2021

Good morning. My name is Felicia Park-Rogers, I am the Director of Regional Infrastructure Projects for Tri-State Transportation Campaign, a regional advocacy and policy organization working to reduce congestion, pollution, and to improve commutes. Thank you for the opportunity to speak in support of 175 Park Ave.

I'd like to focus my comments on the transit improvements included in the project's scope.

As you know, complicated transit connections within the Grand Central complex along with serious congestion at the 42nd Street subway entrance have been persistent issues at this important transit hub. Tri-State appreciates the thoughtful approach that RXR and TF Cornerstone have developed in partnership with the MTA to maximize the opportunities that this project provides for addressing structural issues which have previously prevented major upgrades to Grand Central.

In the coming years, as ridership returns and eventually exceeds pre-COVID levels and as East Side Access brings Long Island Railroad service to Grand Central, it will be critical that we ensure our transit infrastructure is prepared to handle higher passenger volumes while promoting the health, safety, and ease of travel for riders. This project includes a number of investments which will greatly improve rider's and pedestrian's experience moving through the area. Improving riders' experience with transit helps reduce car use to the city center which is vital for combating climate change and bringing economic opportunities back to this critical business and tourist district.

The plan's public improvements go far beyond cosmetic upgrades and create a sizable upgrade to the city's and region's public transit infrastructure.

The transit improvements that this project will deliver will come at no cost to the MTA as the improvements will be privately funded by the developers. This is important for our city's underfunded transit system, even more so during the COVID-19 budget crisis which has severely impacted the MTA budget, including its ability to fully fund better ADA accessibility across the system.

Improvements we are especially pleased to see include:

- Creating desperately needed increased sidewalk widths, by re-locating stairs to the mezzanine level of the subway station. The Lexington Passage entrance would be redesigned with higher ceiling heights to improve the pedestrian experience and the passage which would include retail on both sides of the corridor as well as access to the Grand Central Market.

- The expansion of passenger circulation areas, a new transit hall, reconfigured subway entrances, and an innovative, intermodal connection between the subway and commuter rail lines will all reduce congestion and improve the daily commute for hundreds of thousands of passengers. The new transit hall provides much more circulation space at the entrance to the 42nd St subway as well as moving the turnstiles upstairs which will free up space on the mezzanine.
- New stairs and the widening of the existing stairs – with the new stairs better aligned with the middle of the train platform which will reduce the crowding that currently exists there.
- The use of the currently dis-used loop track as a new pedestrian passageway for the lower level of Metro North and new East Side Access LIRR passengers directly into the subway.
- Adding well more than the 10,000 square feet of required open space which will have a 360 degree public terrace circumnavigating the entire building.
- The ADA and accessibility improvements are especially critical. The new ADA elevator at 42nd St and a new ADA elevator on Lexington that is within the covered vestibule so that people can wait and stay dry in the rain.

In closing, I recommend that the Commission support the proposal for 175 Park Ave. Thank you for your time and attention.