



THE NEW YORK  
LANDMARKS  
CONSERVANCY

December 8, 2021

STATEMENT OF THE NEW YORK LANDMARKS CONSERVANCY BEFORE EMPIRE  
STATE DEVELOPMENT REGARDING THE PENN STATION AREA REDEVELOPMENT  
PROJECT

Good evening. I'm Andrea Goldwyn, speaking on behalf of the New York Landmarks Conservancy. The Conservancy is a 48-year old organization dedicated to preserving, revitalizing, and reusing New York's historic buildings and neighborhoods.

We support improving Penn Station. But we ask you to halt this proposal. There has been no comprehensive explanation of the plan and funding, no broad public outreach, and no discussion of the thoughtful alternatives proposed. We need to be sure that a project of this magnitude is done right.

We are dismayed to see the widely discredited policy of urban renewal as the centerpiece of this plan. The complete proposal, including areas under separate agency purview such as block 780, entails demolition of over 50 historic buildings, some listed or eligible for listing on the National Register of Historic Places.

In this profoundly anti-urban proposal, the State assumes this neighborhood should be sacrificed. This vibrant commercial district has a variety of buildings that support a diverse array of activities and businesses. The dynamic mix of old and new makes New York unique and successful. The renderings for a campus of new supertalls and public spaces present an anodyne vision that could literally be anywhere in the world.

The opaque, segmented process around this proposal has left out New York City's residents. It abandons hard-fought, transparent community engagement. It adds millions of square feet of new development with none of the local zoning controls that every other building owner has to follow. ULURP was established nearly 50 years ago in response to top-down plans that devastated communities. It might be messy, but it's what everyone else has to do. A project that will have such a significant impact on the City should follow ULURP.

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You point to multiple stakeholder meetings over several years. Many of those were private. There was little media attention. By the time this meeting is over, there will have been about eight hours total of public engagement for a plan that intends to entirely transform a section of the City. Uploading a cache of documents some 24 hours before this hearing doesn't equal a meaningful commitment to transparency.

Because of a segmented process, we have heard scant details about exactly how funds will be generated, and how they will benefit the City. We request a transparent analysis of the costs to acquire development sites, construct new buildings, and complete transit improvements.

This plan relies on an unlimited demand for new commercial office space. We believe in the future of New York, but current projections raise significant questions about that assumption. We already have one Hudson Yards. If there is a need for more office space, buildings like the ones set for demolition will be well-positioned to address it. Further, in the midst of a housing crisis, proposing some 1,800 apartments out of 18 million square feet is, to say the least, insufficient.

There will soon be a new City administration and Council. A pause would allow time to elicit their views, have a transparent and comprehensive community engagement, and answer the many questions raised about whether this is the best way to create a station the public deserves.

Thank you for the opportunity to express the Conservancy's views.