

Empire Station Coalition

April 22, 2021

The Honorable Pete Buttigieg
Secretary
U.S. Department of Transportation
1200 New Jersey Avenue, SE
Washington, D.C. 20590

Dear Secretary Buttigieg:

We are a coalition of New York City groups working in the areas of transportation, urban planning, and preservation. We have come together out of mutual interests and concerns regarding the proposed Empire Station Complex, a deeply flawed project of New York State's Empire State Development Corporation and Governor Andrew Cuomo. To avoid any doubt, we completely support Amtrak's separate Hudson Tunnel project.

We write today to request that the U.S. Department of Transportation (USDOT) seek a halt to the proposed Empire Station Complex until a cost-benefit analysis of alternatives is conducted and a comprehensive through-running implementation plan is developed for New York Pennsylvania Station (Penn Station). The public and our elected officials have not been given an opportunity to consider the benefits of a bonafide through-running operation. Reconfiguring Penn Station's tracks and platforms for through-running trains will cost half as much as leveling a Midtown Manhattan block and building Penn Station South. Such a demolition plan appears to be guided by real estate interests over the needs of commuters and residents. Once Amtrak's Hudson Tunnel is completed, a modern through-running operation will increase train throughput *and* provide greater regional connectivity, which a new terminal cannot. The increased capacity that through-running provides obviates the need to demolish several historic landmarks, including the McKim, Mead and White Hotel Pennsylvania, to expand Penn Station. We believe there can be no justification for spending federal dollars on the Empire Station Complex given this reality.

The Empire Station Complex plan aims to use the state's special designation powers for razing dozens of buildings to make way for Penn Station South and ten supertall towers: a patently wasteful, inefficient, and destructive strategy. The plan essentially repeats and expands upon the mistakes made when the original Penn Station was destroyed in the 1960s, one of the greatest failures of urban planning and landmarks preservation. A comprehensive transportation plan should optimize existing infrastructure rather than spending billions of dollars on incremental fixes that will cause significant and needless damage to the surrounding neighborhood and displace hundreds of people and businesses.

One aspect of this plan should be through-running train service, which will reduce development pressure in Midtown West by expanding regional transit connectivity to secondary cores outside Manhattan, such as Long Island City, Queens and Newark, New Jersey. If Penn Station South is built, its location will make necessary through-running implementation in the future more

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challenging and expensive because it will require building new East River tunnels (proposed by the Regional Plan Association as “Gateway East”).

USDOT can help ensure that a legitimate comparative study of through-running is conducted. A [2014 white paper by Amtrak](#) determined that through-running is “technically feasible” but it merely surveyed what would need to be considered for an implementation plan and did not include an evaluation of the entirety of the regional economic benefits. The proposed Empire Station Complex shoehorns New York into a more costly position based on pre-COVID ridership and commercial real estate assumptions. We believe that a through-running implementation plan must be developed and weighed against the Empire Station Complex proposal.

The Empire Station Complex plan doubles down on outdated transit planning strategies instead of unifying the region’s disparate transportation networks into a true regional rail system, akin to what cities like Paris and London already have. As a result, we will get more cars and trucks on the region’s highways and roads. Traffic congestion already exceeds pre-pandemic levels. According to INRIX, NYC is now the most traffic-congested city in the country. By not taking action to modernize the rail network, it means increasing toxic tailpipe emissions, which has disproportionate health effects on low-income people and people of color, and will hinder the federal government’s efforts to meet its climate goals. Moreover, this is the perfect time to act: reduced commuting traffic due to the COVID-19 pandemic provides a unique opportunity to modify Penn Station without excessive disruption to rail service.

The Moynihan Train Hall, predominantly located in a former postal sorting facility, is an excellent example of adaptive reuse of a historic structure. We believe it is a great starting point for restoring Penn Station by creating a world class regional rail system and above-ground station. Penn’s capacity cannot be maximized if the arena is not relocated: the many beams supporting the arena limit the ability to modify Penn’s concourses and platforms to modernize and expand the station. Thus we are left with only a slightly improved version of what we already have—the nation’s busiest rail hub stuck in the basement of a stadium with many significant deficiencies left in place.

The plan for the neighborhood surrounding Penn Station should prioritize human-scale, truly mixed-use development that integrates well with historic areas to the north, south, and east, as well as providing thoughtful additional public green space, safer surface pedestrian and bike routes, and improved busways. We request that USDOT reconsider the Empire Station Complex proposal as it relates to the future of the neighborhood and the city’s evolving landscape. We believe that doing so would follow the intent of Section 4(f) of the National Transportation Act, which requires a review of potential impacts on recognized historic resources for any governmental activity that requires approval from USDOT with an eye towards avoiding any damage to such resources if at all feasible. As you are aware, while often paired with review under Section 106 of the National Historic Preservation Act, Section 4(f) is a separate process with a different, legally-mandated authority and police powers. We encourage USDOT to initiate the consultation process under Section 4(f) for the Empire Station Complex as soon as possible.

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There is a once-in-a-century opportunity to get this right. Now is the time to relocate Madison Square Garden (MSG) as its city-issued operating permit expires in 2023 and it has moved four times before. Now is the time to build a world class above-ground station on par with Union Station in Washington D.C. and 30th Street Station in Philadelphia. Now is the time to build a unified regional rail network, which will solve a vast number of NYC's problems with density and increase economic prosperity throughout the tri-state region. The federal government should not abet the proposed demolition of the Penn Station neighborhood—and the displacement of residents and businesses—to fund a flawed transit plan that fails to seize the moment.

Robert Caro's *The Power Broker* is rife with examples of the federal government funding unaccountable public authorities to the detriment of the common good. This is a similar project. We find ourselves in a different moment in time with new leadership at the federal level and a new legislative supermajority in Albany. Instead of a Moses-era echo, we recommend a design that will make Penn Station easier to navigate, more efficient, and more welcoming for commuters and visitors—all while avoiding needless destruction of a functioning neighborhood. If our national goal is to build back *better*, we must deliver a world class station and unified regional rail service that New York City, the region, and our nation deserve.

Sincerely,

Simeon Bankoff, Executive Director
Historic Districts Council

Lynn Ellsworth, Chair
Human-Scale NYC

Jeffrey Kroessler, President
The City Club of New York

John Massengale AIA CNU, Chair
Congress for New Urbanism – NYC

Felicia Park-Rogers, Director of Regional Infrastructure Projects
Tri-State Transportation Campaign

Sam Turvey, Chair
ReThinkNYC

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The Empire Station Coalition is a group of civic and transportation advocacy organizations fighting for a transportation-centered Penn Station plan that preserves historic landmarks, avoids unnecessary demolitions, and unifies the regional rail network.