

April 6, 2021

The Honorable Andrew M. Cuomo  
Governor of New York State  
NYS State Capitol Building  
Albany, NY 12224

Dear Governor Cuomo:

We write to request a halt to the process for the proposed Empire Station Complex and Penn Station program until a comprehensive plan can be developed for track-level operations and for the building of a world class above-ground station. This should include a neighborhood development plan that respects historic assets, avoids demolitions, and respects the needs of the community. Both plans should be done in a way to ensure meaningful and timely input from key stakeholders, particularly the communities adjacent to Penn Station.

We agree that Penn Station (Penn) needs an upgrade and we believe replacing the station is appropriate. Indeed, it is obvious to all that there needs to be greater train and passenger capacity and to obviate the current cacophonous and dangerous layout at Penn. However, we cannot support a proposal that fails to match the scale of its solutions with the scale of the problem. This is a once-in-a-generation opportunity to bring daylight and a sensible circulation plan to Penn by relocating Madison Square Garden (MSG), and to optimize Penn as a through-running station for New Jersey Transit, Long Island Rail Road, and future Metro-North Railroad 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 to its former glory by building a complementary facility east of 8th Avenue. However, the Metropolitan Transportation Authority's latest design concepts for revamping Penn sadly fail to maximize the station's potential by leaving much of the station in the basement of MSG. Penn's capacity cannot be effectively expanded if MSG 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.

By relocating MSG, the city and state will have a chance to build a grand station on par with Grand Central Terminal, Washington DC's Union Station, and London's St. Pancras Station. Penn is not only the busiest train station in the Western hemisphere; its strategic location from a regional transit standpoint and its place in a richly historical neighborhood means that the station's redesign must aim to correct many mistakes of the past and use this opportunity to truly transform regional transit and the quality of life for the city and region.

We believe that a comprehensive transportation plan must prioritize optimizing existing infrastructure before investing billions of dollars on incremental improvements that will cause significant disruption to the neighborhood surrounding the station. One aspect of this plan

should be through-running train service, which will increase Penn's capacity and reduce development pressure in Midtown West by expanding regional transit connectivity. It also will remove the need to level an entire Midtown block to build Penn Station South. If the Penn Station South project moves forward, its location will make necessary future through-running implementation more challenging and expensive because it will require building new East River tunnels (proposed by the Regional Plan Association as "Gateway East"). Before shoehorning New York into this costly position, we believe that reasonable alternatives must be sincerely evaluated.

The plan for the neighborhood surrounding the 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 more public green space, safer surface pedestrian and bike routes, and improved busways. The proposal should respect the architectural character of the neighborhood, the historic assets around it, and genuinely reflect the needs of local residents and businesses. We request that the Executive Chamber, along with its partners, reconsider this proposal as it relates to the future of the neighborhood and our city's evolving landscape.

Instead of creating a new "campus" of buildings, our organizations recommend a design that will make Penn easier to navigate, more efficient as train demand continues to climb, and more welcoming for commuters and visitors to our city.

Sincerely,

Lynn Ellsworth, President  
Human-Scale NYC

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

Sam Turvey, Chairperson  
ReThinkNYC

George Calderaro, Board Member  
29th Street Neighborhood Association and Victorian Society New York

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

Simeon Bankoff, Executive Director  
Historic Districts Council

Kirsten Theodos, Co-founder  
TakeBackNYC

Michael Kwartler, FAIA, President  
Environmental Simulation Center

Brad Vogel, Preservation Committee Member  
The City Club of New York

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**Human-Scale NYC** is a network of over 100 civic and neighborhood groups across the city. Our mission is to promote neighborhood livability, democratic control over the built environment, and human-scale urbanism by means of education, policy debate, and advocacy.

**Tri-State Transportation Campaign** is a 27-year old advocacy organization that fights for an equitable, safe, multi-modal transportation network that provides options and supports the economies of New York, New Jersey, and Connecticut. TSTC works to fix our commutes, meet our climate goals, stop traffic deaths, and make transportation fair. Learn more at [tstc.org](http://tstc.org).

**ReThinkNYC** is a New York City-based non-profit organization specialized in transportation infrastructure and how it relates to complex urban, governance and socio-economic issues.

**CNU NYC** is the New York City chapter of the Congress for New Urbanism. The chapter particularly focuses on issues of affordable housing, density, urban design, and street design. Jane Jacobs is our patron saint.

**29th Street Neighborhood Association/The Initiative for a Sustainable Midtown** was founded to protect and foster the quality of life of our community from 24th St. to 33rd St. between 8th and 1st Aves.

**Victorian Society New York** was founded in New York City in 1966 to foster the appreciation and preservation of our nineteenth and early 20<sup>th</sup> century heritage.

**The City Club of New York** promotes thoughtful urban land use policy that responds to the needs of all New Yorkers. We provide a forum for public discussion of development issues affecting the urban environment and advocate vigorously for solutions that best serve the greater good.

**Historic Districts Council** is the citywide advocate for New York's historic buildings and neighborhoods.

**TakeBackNYC** is a political coalition of NYC small businesses, residents, and advocacy groups formed with one goal and one goal only: Empower and protect the rights of NYC small business owners.

**Environmental Simulation Center** provides communities and public decision makers with innovative place and performance based planning, urban design, and regulatory solutions through the design, development and application of information technology that enhance decision making.