

Comments, Objections and Alternatives to the Draft General Project Plan, the Penn Station Master Plan and Draft Environmental Impact Statement for the Penn Station Area Civic and Land Use Improvement Project



ReThinkNYC

305 Canal Street New York, NY



A reimagined and energized 8th Avenue Facade to a rebuilt above ground Penn Station modeled on the McKim, Mead and White original. A complement to the newly opened Moynihan Train Hall which will resonate throughout the world. Rendering by NOVA.

I. INTRODUCTION

ReThinkNYC submits the following comments on and objections to the General Project Plan, as issued and as attempted to be revised (“GPP”), the Penn Station Master Plan (the “Master Plan”) and Draft Environmental Impact Statement (“DEIS”) for the Empire State Development Corporation’s (“ESD”) Penn Station Area Civic and Land Use Improvement Project. We define the Master Plan to include resolution of Penn Station’s headhouse/station and track plan which includes the Penn South/Penn Expansion projects. ReThinkNYC’s submission, in its principal part, restates its criticisms and proposed alternatives from its [August 20th, 2020 Submission](https://static1.squarespace.com/static/5f723bf7220aa368d86e80e5/t/60004f4f97718636e5bacab6/1610633058899/ReThinkNYC+2020-08-20A.pdf)¹ with regard to the Draft Statement of Work for the then named Empire Station Complex proposal.

¹<https://static1.squarespace.com/static/5f723bf7220aa368d86e80e5/t/60004f4f97718636e5bacab6/1610633058899/ReThinkNYC+2020-08-20A.pdf>

Further, ReThinkNYC endorses and is a signatory to [Charles Weinstock's comments](#)², submitted to ESD in February 2022, on the GPP (and implicitly the Master Plan) and DEIS, which focus on deficiencies in the process and substance of the ESD, GPP (and, implicitly, the Master Plan).

In particular, we endorse Mr. Weinstock's analysis of ESD's invalid segmentation of the Master Plan. We also share his assessment of the ESD GPP (and implicitly the Master Plan) and DEIS deficiencies in the areas of land use, zoning, and public policy, including its failure to properly consider alternatives (including RethinkNYC's own proposals on "through-running"). Where appropriate, we supplement his submission in these areas with our own points of view and data (see submission as to "View Corridors" further below) and supplement the deficiencies he notes to the Neighborhood Conditions Study and other DEIS sections (as we find the survey of impacted businesses and residents undercounts reality).

Stated simply, and in conjunction with Mr. Weinstock, we object to the GPP (and implicitly the Master Plan) and DEIS for attempting to treat real estate development, station access, and train operations as separate and distinct rather than interrelated. The GPP and the Master Plan have their priorities backwards. The GPP and the Master Plan approach is "development first, transit maybe," when it should be "transit first, development maybe," i.e., development when and where needed, helpful and not wantonly destructive. When one looks past ESD's attempts to suggest that review of infrastructure improvements at Penn Station should proceed in as many as four different workstreams, the failures of the combined proposals (to the extent they are known), are compounded.

Looked at as a whole, and as set forth more fully in this introduction and in the balance of our submission, ReThinkNYC objects to the GPP and the Master Plan that calls for the demolition of the neighborhood surrounding Penn Station, largely via eminent domain, so as to make way for a dense array of "supertall" towers, which proponents claim will assist in funding transit and architectural improvements at Penn Station. The transit plans are unduly expensive, inefficient and dated. The plans to keep Penn Station in the basement of Madison Square Garden are illogical. The displacement of residents, small businesses and the destruction of a neighborhood and its historic structures is cruel and unnecessary. This apparently meets with some unproven theorem expressed by ESD to [promote office towers from river to river as a necessity](#)³. It has [failed miserably in every city that has adopted it](#)⁴. All of this, as will be seen, is

² https://drive.google.com/drive/folders/14L1-oUyrQh_SzpBijiFPggdHoSLw9INi?usp=sharing

³ https://youtu.be/_v6hwJkxhWA?t=3160

⁴ https://drive.google.com/file/d/1CdxBoVC3Lx9LHQVJ5_sPxoQPasSrsAbao/view?usp=sharing

proposed when far more beneficial alternatives exist for Penn Station, including those in this submission.

A. The GPP and Master Plan and ReThinkNYC's Alternative Proposals: An Overview

After studying ESD GPP and the Master Plan proposals, we believe the ESD and others should scrap the plan in its entirety. It is borne of conflicts and compromises that favor the few over the many. It will cast in concrete for many decades some of the worst transit, environmental, and urban planning decisions we have seen in 75 years. It places unjust burdens on local residents and small businesses, whose reward for surviving COVID and staying the course in the city they love is to be served eviction notices. While the GPP claims to be transformative and world class, it is regressive and will harm the city's ability to compete with international peers, specifically with other financial centers at home and abroad.

The Governor's plan, to revise the GPP and the Master Plan, does not differ markedly from her predecessor's. Much of the Penn Station neighborhood will still be needlessly demolished. "Supertall" buildings will still add unsustainable density to the vicinity, blot out the sun, and obscure the skyline. Penn Station will remain underground. Under the governor's plan, the public will be condemned to wander through a desolate construction zone for decades to come.

Below, we set forth our objections to the GPP and the Master Plan for Penn Station. We also list our alternatives. To the extent our alternatives go beyond the artificially segmented nature of the GPP, we stand by our submission. **The attempt to segment the resolution of the conundrum at Penn Station into a GPP, a separate Master Plan, and a further separate transit plan is legally invalid.** It is impossible to separate the operations plan of a station from the design of its concourses, tracks, platforms, and above-ground headhouse and the immediate neighborhood in which the station sits. The public should not have to play "musical chairs" with unilaterally and illogically defined segments of a \$40 billion dollar infrastructure project of this magnitude.

B. The GPP and the Master Plan will in no way result in a "World Class" Transit-Oriented Commercial District in the Penn Station Neighborhood

The Governor and other proponents of the GPP and the Master Plan promise "world class" and "necessary" improvements to transit facilities and the public realm in and around Penn Station to justify their demolition of the neighborhood. This is done in both public statements and as a defense to various irremediable consequences discussed in

the DEIS. Let it be said at the outset that ReThinkNYC challenges any suggestion that the GPP and the Master Plan will result in a “world-class transit-oriented commercial district.” Rather, the GPP and the Master Plan— and its segmented approach to the inherently intertwined issues at Penn Station— will result in nothing other than an incoherent, badly dated, dysfunctional project that will cost approximately \$40 billion to deliver inferior transit service, a station pinned below Madison Square Garden, and demolish one of New York’s unique neighborhoods. This will become especially apparent when these retrograde proposals are compared to the alternatives ReThinkNYC has identified.

The GPP, on its face, is not a “world class” plan and runs contrary to everything we have learned about transit, architecture and urban planning in the past 100 years. The GPP, recently labeled “arrogant” by *New York Magazine*’s Justin Davidson, advocates a dated “terminal” transit operating model (as opposed to “through-running”), the continued confinement of North America’s busiest rail hub to its present subterranean location, and the building of a dystopian Dubai-style urban monoculture of supertalls that is inhospitable to the healthy and active street life for which NYC is famous. Getting Penn Station right affords New York the chance to emerge from the pandemic stronger than ever, with its world leadership role intact. If we follow the GPP and the Master Plan, we will squander that chance.

There are viable, superior and more affordable alternatives to the GPP and the Master Plan. There is no need to demolish the neighborhood around Penn Station to build more tracks as additional tracks are not needed. The problem with Penn Station is not that it is too small, it is that it is inefficiently operated. New York’s need for functional interregional transit and rebranding requires an elegant and distinguished above-ground station, which means the Garden must move to a new more convenient location. It bears repeating, one of our lead recommendations, converting much of commuter rail at Penn Station to through-running eliminates the need to demolish any of 31st Street. And, of course, affordable housing (including permanent affordable housing) and social services (here the needs of the homeless appear most acute) must be part of any plan.

C. The ReThinkNYC Proposals

1. Converting most of Penn Station’s commuter rail traffic to through-running

A holistic approach that addresses the root causes of Penn Station’s dysfunction would start by considering how trains at Penn Station should operate. That means converting Penn Station from a terminal to a through-running station. This is being studied as part of the EIS process for Amtrak’s Gateway Program. Such an approach would significantly expand the station’s capacity, i.e., the volume of trains and passengers it

could handle, and would have far-reaching implications for every square inch of the Penn Station area. It would also cost less than what the GPP and the Master Plan is proposing.

The Governor would retain the station's track plan, which is the source of the station's dysfunction. The Long Island Railroad and New Jersey Transit treat the station as a terminal rather than as a through-running station. That means trains arrive from Montclair or Hempstead at rush hour laden with commuters, deposit them, then return empty, but not before blocking the track for a half an hour as they are serviced for the return trip.

Through-running means that commuter lines would operate more like the subway and would pass through Penn Station while originating and terminating in rail hubs on either side of the Hudson and East Rivers. This would allow for the unification of the region's rail system some eighty years after Fiorello LaGuardia merged New York City's independent rapid transit lines in 1940.

Studies show converting to through-running, Penn Station, *as now configured*, would be able to service more trains on fewer tracks. This would permit the widening of platforms and staircases, a much-needed public safety measure and a considerable amenity for travelers, which would further increase capacity. This up-to-date model of station operations would cost less than adding new tracks under 31st Street to 30th Street, provide superior commuter service, and unify the region's commuter rails. And again, as we do not need more tracks, we do not need to demolish a whole city block to lay them.

2. Madison Square Garden needs to move to a more appropriate site in order to maximize operations at Penn Station and provide the room for the Gateway the City, State and Region deserve

Any plan for a well-functioning, humane, aesthetically pleasing Penn Station requires us to move Madison Square Garden. ReThinkNewYork has identified at least three viable new sites for the Garden. It is absurd to spend billions of dollars to fix Penn Station only to leave Madison Square Garden – the essence of the station's problems – where it is.

There have been four different Madison Square Gardens over the years; here are some possible locations for a fifth one: 1) Hudson Yards below the Javits Center, 2) Herald Square and Broadway (the site of the Gimbels Department Store, which to the greatest extent possible should be adaptively reused, 3) Dyer Avenue south of the Port Authority Bus Terminal and 4) above the ramps in and near the Port Authority Bus Terminal .

There are two other sites—one proposed by Vishann Chakrabarti and one by the late Hugh Hardy in the survey linked in our discussion below.

Penn Station will never be a world-class transit hub unless and until MSG moves. As long as MSG remains where it is, it is impossible to make anything but minimal, cosmetic improvements to Penn Station.

Grand Central Terminal is world class. London's St. Pancras is world class. So are Paris' Gare du Nord, Berlin's Hauptbahnhof, and Madrid's Atocha. All of those stations are world class because they made sure to first get the actual transit service right, and then designed a station to match. If the GPP and the Master Plan are to go forward and all of its "improvements" are implemented, Penn Station would still not be world class. In fact, within five years of completion (if not sooner), it would be likely that Penn Station will be as accursed as it is today.

3. A great above-ground station should be built at Penn Station and we advocate that it should be modeled on the McKim, Mead and White original

ReThinkNYC has long advocated for a modernized version of McKim, Mead and White's original Pennsylvania Station as the optimal solution to the problems of Penn Station. We have submitted appropriate designs for an above-ground station based on a rebuilt but modernized version of McKim, Mead and White's original. Large-scale reconstructions happen in Europe with some frequency. Dresden's Frauenkirche and the restoration of Warsaw's old city center are examples.

In addition, three factors represent, in themselves, major cost savings:

- The original foundation was never destroyed and so no new foundation would have to be laid.
- The architect's original plans are extant and in the collection of the New-York Historical Society.
- Modern building techniques significantly reduce the cost of construction. Other environmentally friendly techniques can be used in reconstruction and circulation issues, vertical and otherwise, can be easily addressed in a rebuild.
- The architects are considered among the greatest in world history and this was the signature achievement and last commission of its member, Charles McKim
- The original Penn Station is considered one of the greatest public buildings and train stations ever created. If it still existed, no one would even consider replacing it with something like what the GPP proposes.

We believe that the experience of travelers and visitors to the Station would have an inestimably positive impact on the City's aesthetics, quality of life, economy, and brand at a level that is at a multiple of competing visions for Penn Station.

4. The GPP and the Master Plan will unnecessarily destroy irreplaceable historic fabric in the city and displace residents and businesses: less aggressive value recapture strategies should be evaluated and utilized

The Governor's plan will be a bonanza for developers. The relaxation and elimination of some zoning regulations will facilitate the march of Hudson Yards eastward to engulf Penn Station and its immediate vicinity. The precedent we are creating by this means of infrastructure funding will put much of our pre-war architecture, and with it, our urban identity and skyline at grave risk.

Already we see this playing out for the McKim, Mead and White's Hotel Pennsylvania.

In a different neighborhood, we are seeing views of the Chrysler Building eliminated for this sort of thinking.

As to the Hotel Pennsylvania, its owner, Vornado, promised to restore the landmark hostelry when it acquired it; but now it is threatening to pull it down as the removal of zoning restrictions under the GPP and Master Plan make the Hotel's demolition a foregone conclusion. This fine, if abused, specimen of the work of McKim, Mead and White could be gloriously restored and converted into a world-class hotel or residential building. Out-of-state investors have announced plans to restore Herald Square's woebegone Hotel Martinique to *its* original glory.



While the Governor and the GPP look to the wholesale demolition of the Penn Station neighborhood, displacing residents, small businesses and destroying historic sites, a group of investors from the Midwest are casting a vote of confidence in the neighborhood's built environment with their investment in the Hotel Martinique.

NYC developers need to demonstrate a similar appreciation for New York's rich architectural tradition **. Also at risk in the Penn Station neighborhood are the Hotel Stewart, Napoleon le Brun's R.C. Church of Saint John the Baptist, McKim, Mead and White's power plant for the old Pennsylvania Station (miraculously, still extant), Daniel Burnham's Gimbels Department Store building, and the contiguous 32nd Street Skybridge.

If we lose a building so obviously worthy of landmark status as the Hotel Pennsylvania, then the Pennsylvania Station will have died in vain.

5. New York deserves our best thinking at Penn Station

Residents of New York and the metropolitan area deserved a better Penn Station *before* COVID; even more so now that we're emerging from a prolonged hard time.

Journalist Michael Lewis has pointed out that some of the world's greatest infrastructure projects, London's Thames Embankment, Philadelphia's Fairmount Park Water Works and Paris' Champs Élysées, followed serious public health crises. The GPP and the Master Plan completely miss this historic point or the opportunity in front of the City, State and Region. Why shouldn't we be thinking about resolving issues at Penn Station with the best possible solutions?

At Penn Station, there are obviously better solutions that would modernize station operations, transform intraregional rail service, serve the economic interests of the metropolitan area, preserve rather than demolish much of Midtown West. These solutions will provide the City, the region and the world with a world class aesthetic experience and marked improvements in quality of life. ReThinkNYC believes its proposed solutions provide this. If Penn Station continues to serve, as it has for decades, as a terminal station, and it remains in the basement of Madison Square Garden, a tremendous amount of value will be "left on the table."

As to the station itself, buildings are not mortals; they *can* come back from the dead. If Grand Central were destroyed through an act of God or man, does anyone doubt that we would restore it? Why should the Pennsylvania Station be any different?

Again, what would be the impact on New York's brand if we rebuilt the original Pennsylvania Station? The project and its successful completion would capture the world's imagination. The world's media would be agog at New York's vision, its resilience, its determination to remain on the cutting edge of modern culture. The implications for tourism and business would be vast and would play out for generations thereafter.



Steven Spielberg's "West Side Story" features the magical Gimbels Skybridge over West 32nd Street. It will be lost under the GPP. Will New York City's rich urban fabric soon be available to us only in CGI renderings?

We also will have saved one of New York's liveliest districts from destruction, including the homes and businesses of thousands of New Yorkers and some of our most cherished historic sites and landmarks. It is not an accident that Stephen Spielberg included Gimbel's Skybridge in his remake of "West Side Story".

We also share in former New York City Design Lead Alexandros Washburn's criticism of the phantom financing found in the GPP and the Master Plan. Washburn pointed out in his written testimony to the GPP and DEIS that:

"The present plan proposes building skyscrapers first and the station later, while not caring about MSG. That's bass ackward. Let me explain. We all agree that to improve the condition of the Penn Station neighborhood, we need to revitalize its core. To revitalize its core requires three pieces of infrastructure: a great public space, a great train station, and a great arena.

With the core revitalized, the buildings surrounding it will follow. Look at Bryant Park, the High Line, Times Square.

'But we need the skyscrapers to pay for the station!' is what ESD is telling us. What does that mean? Well, it means taking the tax revenue that the skyscrapers would pay to the city and instead paying it to the state which says it would spend it on the station. First, that's not fair to us city tax payers. Second, it's the tail wagging the dog. The public investment is supposed to be multiplied by the

private investment to follow. If done right, you should expect a ratio of 30 to 1 like the High Line achieved. Its first two sections cost \$100 million of public money. Careful planning allowed over \$3 billion of private investment to follow it. And it just gets better. The area surrounding the High Line has now seen over \$30 billion in private investment from Little West 12th Street to 34th Street.

And let me point out that this planning was done by the Department of City Planning. They know how to plan neighborhoods in Manhattan. They don't need a state plan to override them. Imagine if former Governor Cuomo had said, 'Let's build skyscrapers around the High Line first and then spend the money on improving the High Line later.'

Wrong.

It's not just financial planning that matters. So does the physical planning. To hem in the current awful Penn Station with skyscrapers around its perimeter perpetuates the problem. Despite the happy words, the station will never be solved because fixing the station while the trains operate beneath and MSG operates above will cost three times as much as it would if you had some elbow room."

And so, having discussed briefly here, and in more detail in Charles Weinstock's submission supplemented by Alex Washburn's testimony, how and in what ways the GPP and the Master Plan fails the city, the state and the region; we set forth below the details of our alternative plans along with supporting information and documentation.

At the conclusion of our presentation, we will pose this question, which we raise here in advance:

Why would one of the world's greatest cities, facing intense global competition, settle for a plan as flawed as the GPP and the Master Plan when there exist viable, dynamic and compelling alternatives?

II. PROPOSED TRANSPORTATION IMPROVEMENTS

A. Overview: Converting Penn Station into a Through-Running Station

Fixing Penn Station is a once-in-a-century opportunity to remove the dysfunction, congestion, and band-aid fixes that have plagued Penn Station since the original building was demolished in the 1960s. The transit approach taken should match international best practices to ensure that New York commuters have a world-class commuting experience - a description that has never been used for the current Penn Station. That requires a fundamental shift in how the station is operated instead of the proposals to tinker with operations as proposed by the GPP.

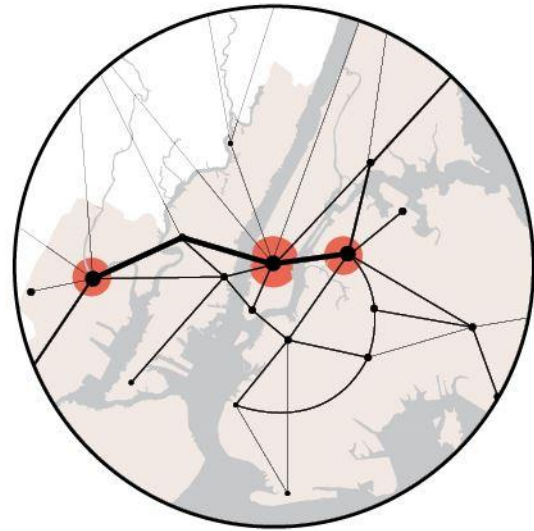
Penn Station is more than an anchor tenant for the “cohesive transit oriented commercial district” referenced in the GPP. RethinkNYC proposes to address the Penn Station dilemma in a truly transformative fashion well beyond Midtown Manhattan. The problem isn’t that Penn Station is too small, it’s that it is inefficiently operated. Therefore, we believe it is clear that *Penn Station shouldn’t be expanded, it should be fixed.*

Converting Penn Station from a terminal into a through-running station would allow Penn Station to provide the best possible transit service. Through-running would mean that commuter rail trains would no longer turn around in Penn Station but would instead continue through the station to a destination on the far side of the region’s core. This would be accompanied by the creation of expanded or new transit hubs in Secaucus, NJ, Sunnyside, Queens, and elsewhere, and the reactivation of passenger service on lines that historically hosted it. In the process, we would expand the core of the region so that more places would have the same degree of regional connectivity that you can only find in Midtown Manhattan today.

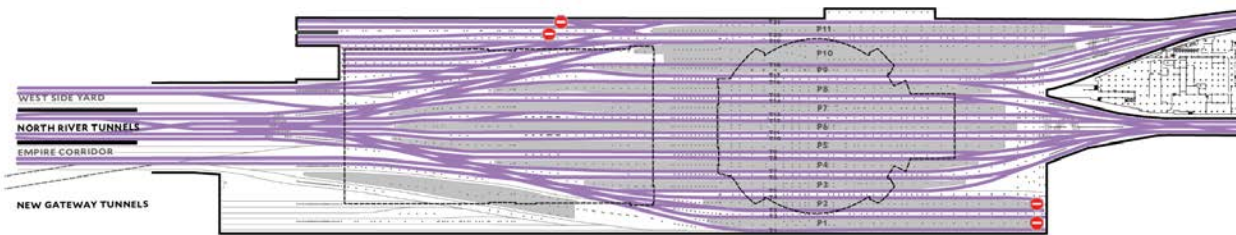
Within Penn Station, this would mean wider platforms, simpler train movements, and greatly improved vertical circulation - made possible by the sharp reduction in dwell times required by through-running trains versus turning trains.

Current: radial service to Manhattan only

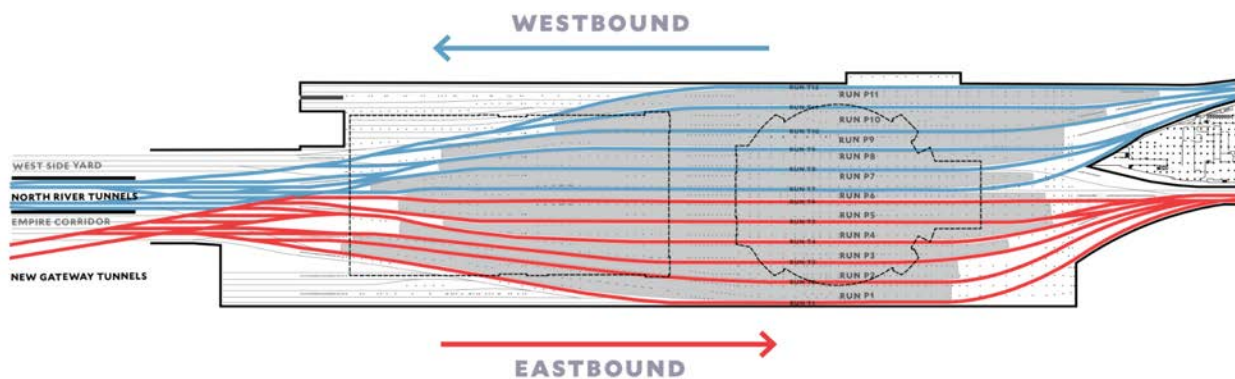
Proposed: Expanded core with through-service



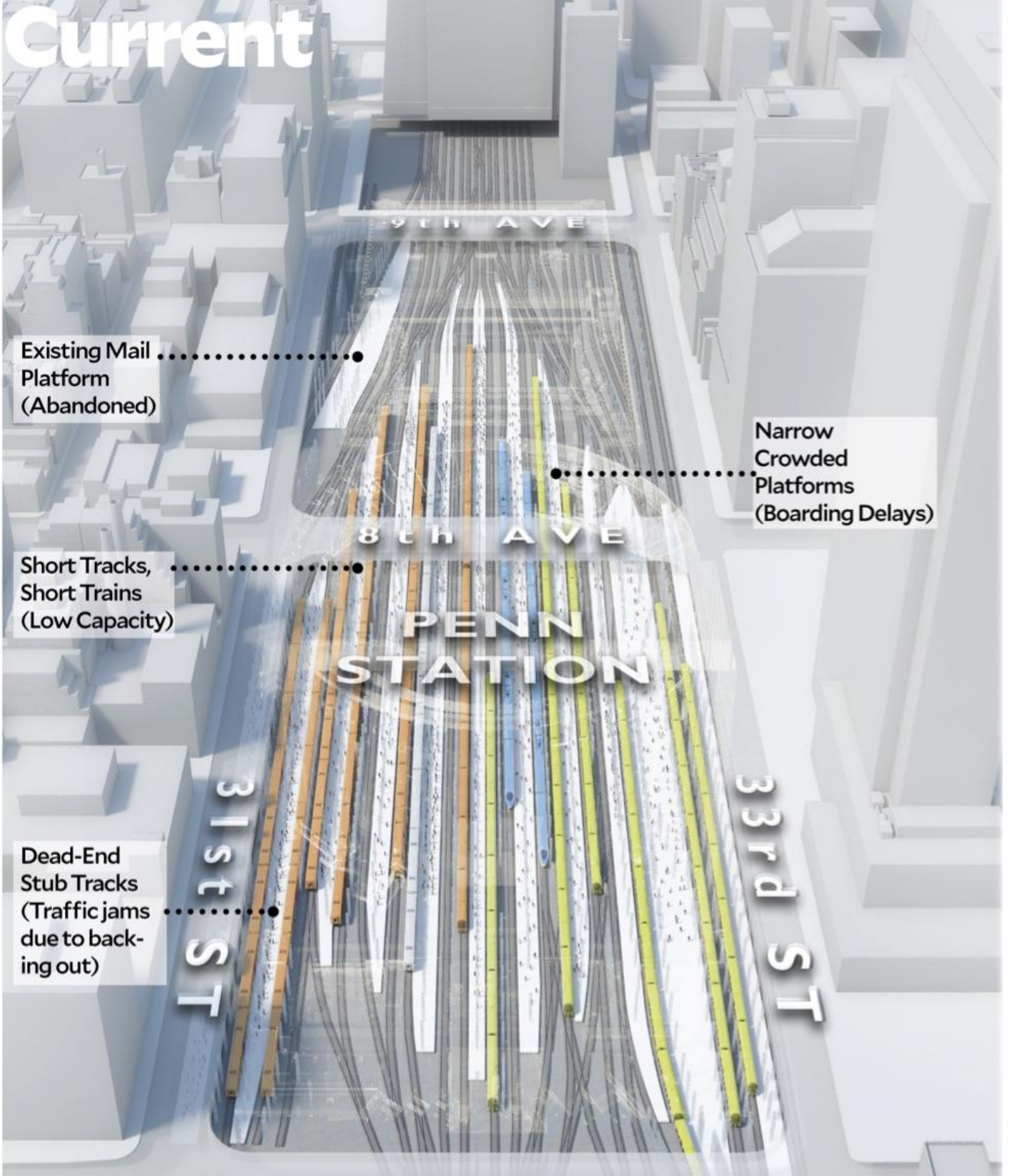
Current: All tracks have conflicting movements in both directions, many dead-end in Penn Station



Proposed: Bilateral, symmetrical through-service with more efficient operations and no conflicting moves, yielding more trains per hour on fewer tracks and no dead end movements



Current



Existing Mail Platform
(Abandoned)

Narrow
Crowded
Platforms
(Boarding Delays)

Short Tracks,
Short Trains
(Low Capacity)

Dead-End
Stub Tracks
(Traffic jams
due to back-
ing out)

PENN
STATION

31st ST

33rd ST

8th AVE

9th AVE

Proposal

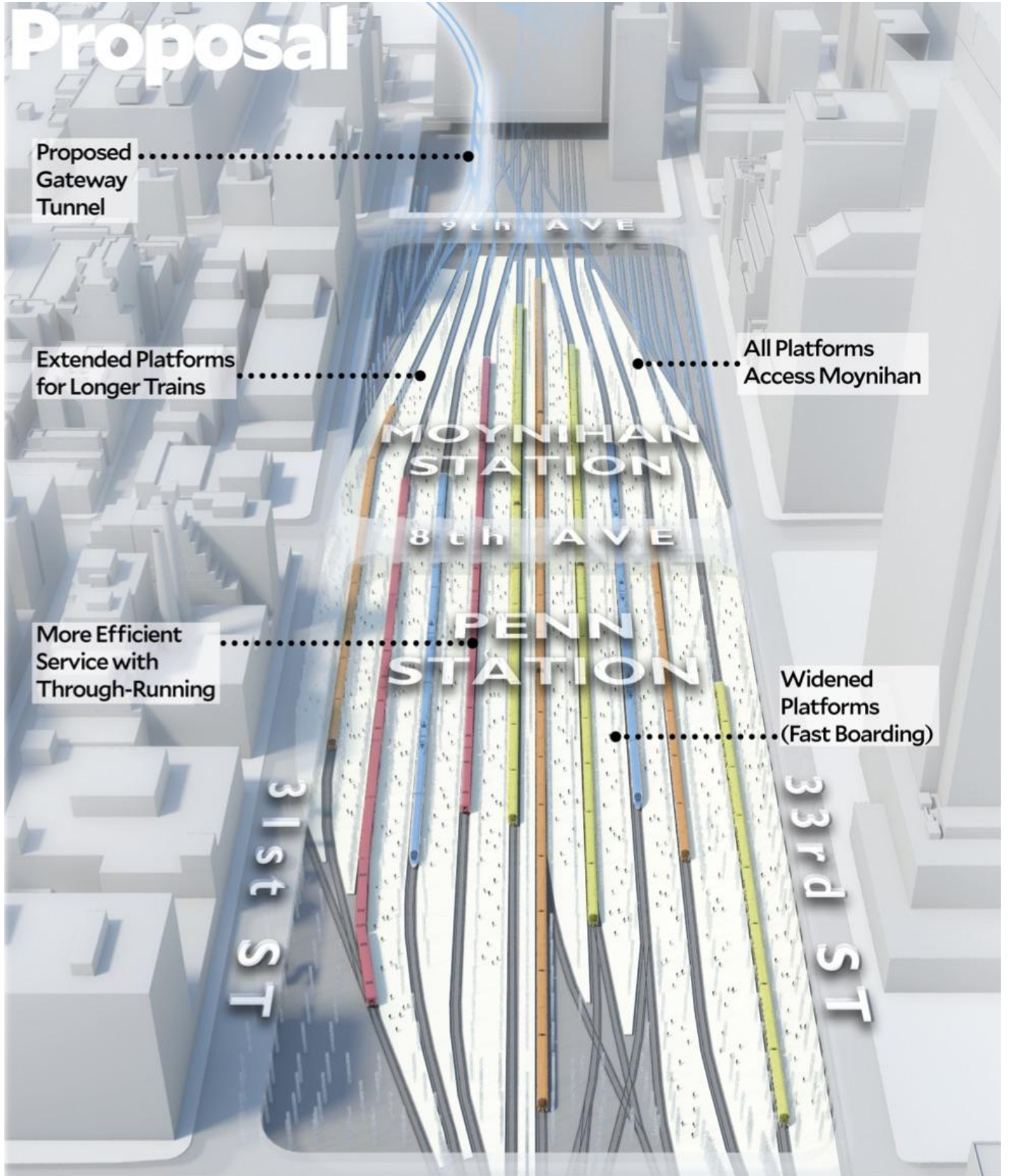
Proposed Gateway Tunnel

Extended Platforms for Longer Trains

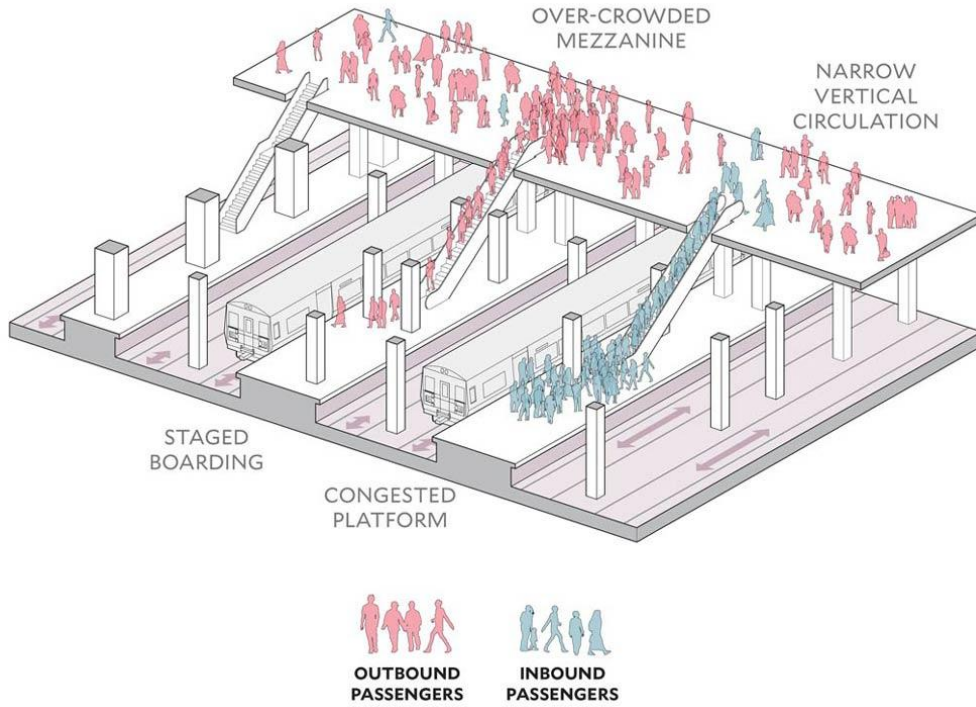
More Efficient Service with Through-Running

All Platforms Access Moynihan

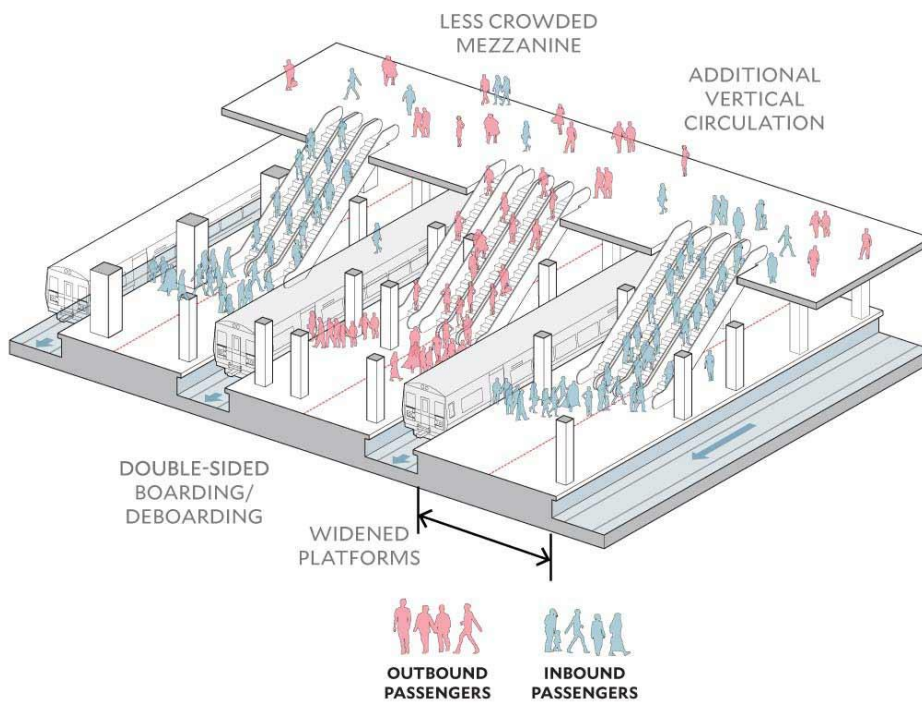
Widened Platforms (Fast Boarding)



Current: *Narrow platforms with inadequate and crowded vertical circulation*



Proposed: *wider and longer platforms with three times as much vertical circulation*



Such a system has been repeatedly studied, including at least three times by agencies operating in Penn Station within the last few decades. In all cases, through-running has performed well in internal analysis.

In 1994, LIRR studied a through-running proposal and found that, for example, “there are no identifiable differences between the operating costs which would be incurred by the two railroads for the operation of this service and those which are incurred today... Neither (propulsion or signals) is more than a modest technical hurdle.”

In 2014, Amtrak studied commuter rail through-running in Penn Station and concluded that it would increase the capacity of the station by up to 25%, even assuming no other changes were made in the station itself to help better serve more customers, such as increasing circulation between the platforms and the concourses.

And last year, in a presentation to the Community Action Working Group that was established to help inform this process, the MTA made clear that a version of through-running with severe and unsupportable self-imposed restrictions could provide a significant increase in capacity in the station.

Considering this history, ReThink insists that this GPP not approve any substantial construction until a transit plan based on the following core characteristics has been thoroughly studied. As will be demonstrated, such a plan is feasible, would cost substantially less than the current proposal, and would substantially alter the needs of the Penn Station Area. Specifically, we insist that a plan be studied that includes:

1. Through-running on **all** tracks at Penn Station.
2. The changes to platform location within the station proposed by ReThink, including shifting Platforms 1 and 2 slightly to the west and Platform 11 slightly to the east, to facilitate full through-running and to fully eliminate conflicting train movements in the station.
3. Widening of platforms within Penn Station - through similar means and methods proposed in the 2021 MTA study on through-running in Penn Station - in the station layout shown on Page 14.
4. Construction of a new tunnel in the Bronx to permit the Hudson and Harlem Metro-North lines to run on this system.
5. New yard facilities for peak-hour, peak-direction trains using legacy rolling stock that are incapable of running through.

6. At least one hub station in New York and New Jersey that would permit peak-hour, peak-direction trains to terminate beyond Penn Station without fully running through to a suburban destination.
7. Purchase of rolling stock compatible with signaling and propulsion requirements in both New Jersey, New York, and Connecticut, such as a modified MLV-EMU (similar to the rolling stock currently in use on the New Haven Metro-North line).
8. Realignment of the East River Tunnels to support bilateral, symmetrical through-running within Penn Station, to be coordinated with the planned rehabilitation and reconstruction of those tunnels.
9. Any minor changes required to other projects included in the Gateway Program.

Such a system would provide clearly superior transit service to the status quo approach, or to a status quo plus approach as envisioned in the proposed Penn Station expansion in the GPP. To cite several examples, it would:

1. Dramatically improve the passenger experience for virtually everyone using Penn Station by making it easy to get between the concourse level and the platform level, which today is extremely difficult. It would eliminate staged boarding, crowded and unpleasant stairwells, and the mad dash from the concourse to the platform after a train's track assignment is announced.
2. Expand the number of people who would be within a reasonable transit commute of business districts like Sunnyside, Newark, Jersey City, Mineola, Jamaica, White Plains, New Rochelle, Stamford, and others. This would allow for significant commercial development outside of Midtown Manhattan.
3. Significantly reduce delays, and increase operating speeds, in Penn Station by simplifying track layouts and eliminating conflicting train movements.
4. Double - or more - the number of trains that can travel between New York and New Jersey at peak hours, which is equivalent to or greater than the improvement proposed under the existing plan.
5. Increase by 20-35% the number of trains from New York and New England that can travel to Penn Station at peak hours, whereas the proposed GPP would not provide additional capacity for New York or Connecticut commuters

6. Reduce road congestion by turning tens of thousands of long-distance car trips a day between New Jersey and New York into mass transit trips.
7. Nearly universal mass transit access to regional amenities, such as hospitals, universities, airports, and sports stadiums.

B. Precedents - Case Studies

Through-running has become the international standard because it works. It is the most efficient way to provide high-quality service both from suburban destinations to the city center and between suburban destinations on different sides of a metro area.

Modern through-running is branded different ways in different countries - as RER in France, as CrossRail in the United Kingdom, as S-Bahn in Germany, and using any number of different brands in Tokyo, Japan. But whatever the branding, a common set of operating principles separates through-running systems from a traditional hub-and-spoke commuter rail model like NYC currently has. Those are:

1. Service across the metro area, not just to the center of the city to allow faster trips to a wider variety of destinations. Pair this with a dispersed development strategy.
2. Frequent, all-day, bi-directional service
3. Single, integrated network
4. Simple, consistent service patterns (“clock face scheduling”)
5. Wide platforms, enough stairs and escalators
6. High-performance trains - not locomotives

Service in New York has elements of a high-quality through-running system already, but does not operate that way. The RUN34 proposal strategically fills in the gaps in the existing system based on lessons learned from peer cities and cuts the Gordian Knot at Penn Station that is holding the entire region back.

Through-Running in Europe



Munich

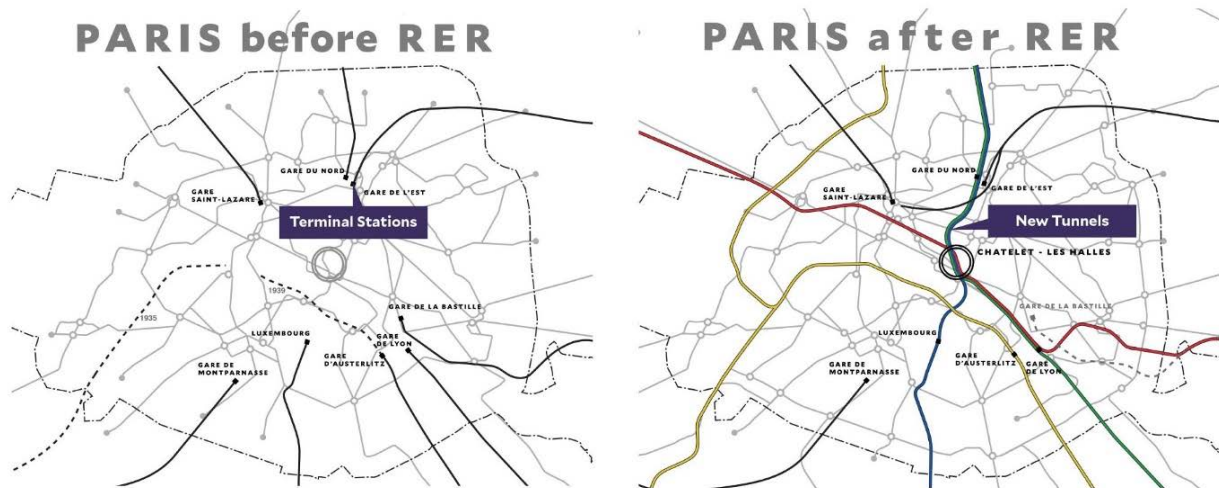


London's Crossrail service map. Image Source: Crossrail.



New Crossrail tunnel under the city center. Image Source: Crossrail.

London



Paris

In each of these cases, the city connected existing train lines that did not run through the center of the city with a new tunnel. In Paris, two different companies operate the combined through service (SNCF and RATP). In New York, the majority of the tunnel required to run through service is already in place, and almost all of the remainder is already being built as part of the Gateway Program. Through-running has significant positive synergies with a number of other recent or ongoing MTA and NJT projects, such as the Third Track program, improvements at Jamaica Station, Penn Station access in the Bronx and Westchester, East Side Access, proposed interlocking and junction improvements in New Jersey, and rolling stock orders that have the capacity to be modified to support through-running.

C. Technical Feasibility and Phasing

A requirement of the RUN34 plan is that Penn Station would be able to support 48 trains per hour (TPH) per direction (the perceived maximum possible with anticipated signaling in tunnels to Manhattan from New Jersey and Queens) at the morning peak within the existing footprint of the Penn/Moynihan Station complex, which is 7th-9th avenues from 31st-33rd Streets. That is significantly more trains than currently use the complex; pre-COVID, almost 40 TPH moved in the peak direction through the East River tunnels and approximately 24 TPH moved in the peak direction through the North River tunnels.

Our proposal developed a phasing strategy based on Amtrak's 2014 White Paper on through-running at Penn Station (which is attached to this submission as Appendix A) to bring us from the current capacity to our proposed higher capacity.

Pre-COVID, during the morning rush hour approximately half of NJ Transit and Long Island Railroad trains dropped off all passengers at Penn Station, then continued in the same direction empty to a yard where they were stored until the evening rush. The railroads call this service pattern “drop and go”. The other half of trains turned in Penn Station and went back out to the suburbs as reverse peak service. It is this second class of trains that presents operational challenges at Penn Station today and the greatest opportunity for improvement with through-running.

In its 2014 study, Amtrak modeled a number of different scenarios for what would happen if you replaced certain kinds of trains with through trains, assuming none of the limitations in Penn Station had been fixed. The first scenario they modeled- immediate full through-running - does not work because of its impact on “drop and go” trains. To quote from the study, replacing all commuter trains with through trains would equate to *“a 16.9% increase in total dwell time. This level of increase is likely not possible... Converting all revenue to non-revenue train movements to a through operation would require a reduction in total train movements.”* This is obviously unacceptable as an option for increasing capacity.

Conversely, Amtrak found that a second option for how to implement through-running would increase rather than decrease station capacity. If you replace just the turning trains with through trains, and leave drop and go service untouched, Amtrak found that this would theoretically increase the capacity of the station by 25%, with a somewhat smaller increase in reality after accounting for the complexity of operations at Penn Station. As the study noted: *“Through-running of trains at Penn Station is technically feasible... Depending upon the operating strategy chosen, implementation of through-running could enhance or degrade total capacity of the terminal.”*

Twenty-five percent is a significant capacity increase, but it is not sufficient on its own to meet the key criteria of fully serving two pairs of tunnels under both the Hudson and East Rivers. That is why it is important to treat this as an initial change, rather than a final one. If you can provide the same service in less time you need fewer tracks. If you need fewer tracks, you can remove tracks from service to make changes to them without reducing the number of trains that are running.

In Phase 1 of our construction plan, which is preparatory to major work that would impact peak hour operations, we propose interventions in the existing station that can be done in night and weekend periods. This would include removing the defunct mail platform, installing shorings, minor modifications to interlockings and minor demolition work. In Phase 2 we propose taking Tracks 1-3 and 17 out of service. Tracks 1-3 would be modified to run through to the East River Tunnels (which they cannot serve today).

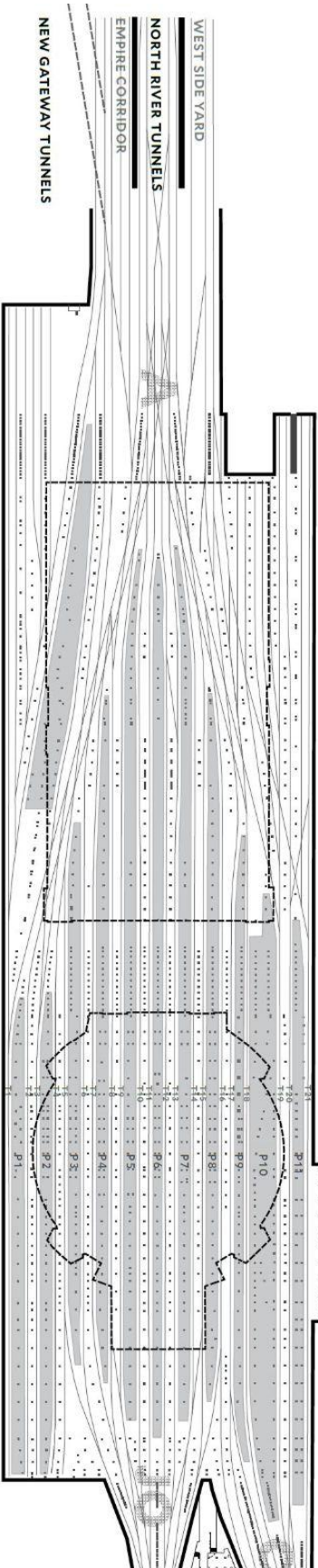
At the same time, we would both lengthen and widen Platform 1, between current Tracks 1 and 2 so that it is instead between Tracks 1 and 3; At the end of this phase, Track 2 no longer exists, but Platform 1 is 50% longer (and now extends under Moynihan Station, which it does not do today), twice as wide, and has three times as many stairs and escalators as it did previously. We have developed a number of track and platform geometries for Tracks 1 and 3 based on potential non-public constraints on the changes possible (such as exact column placement and whether it is possible to use an easement under 11 Penn Plaza). All proposed track and platform geometries are compliant with the ADA's level boarding guidelines and the practical limits of switches and curves. During this phase, Platform 9 is similarly proposed to expand over adjacent Track 17 during Phase 2 to grow 140% in area and allow greater vertical circulation access, and it would remain accessible to both the East River and Hudson River tunnels.

Combined with the existing wide and long Platform 10 between Tracks 18 and 19, which would receive targeted upgrades under our proposal to increase vertical circulation, this allows for a significant amount of through-running service without staged boarding, allowing significantly increased throughput on these tracks and platforms. This allows you to sequentially take additional tracks out of service - alternating between the eastbound and west-bound tracks, and at no point in time reducing present allowable levels of service - until all tracks and platforms are upgraded to this new standard.

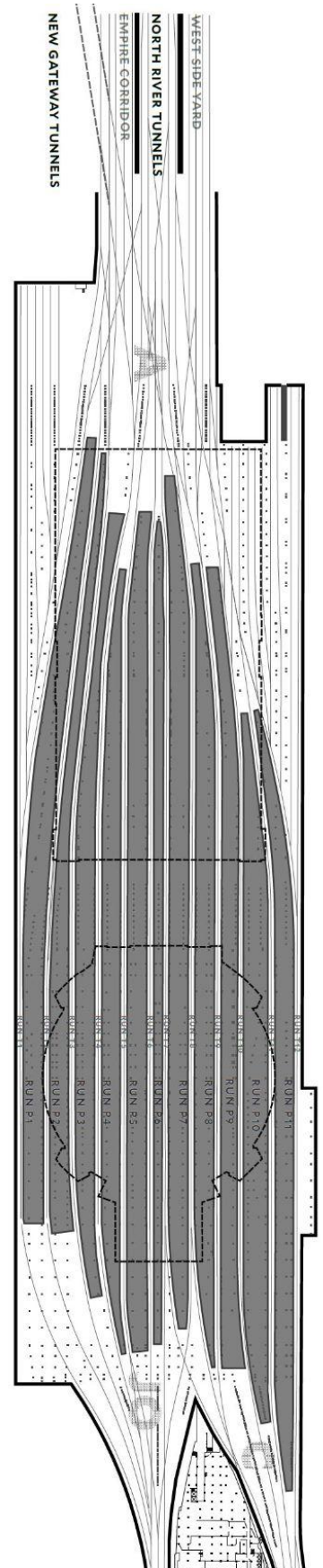
All resulting tracks would have access to two platforms, one on each side, and on at least one of the two sides they would have ADA-compliant access to the train.

All work required outside of Penn Station could begin prior to the start of work in Penn Station. This would include: realignment of the East River Tunnels as part of the post-Sandy East River tunnel rehabilitation project; construction of a station in Sunnyside Queens; construction of a station in Port Morris, the Bronx; construction of a rail yard in either the Bronx or Queens; construction of all elements of the Gateway Program west of 10th Avenue, including reconstruction of the Secaucus Station and construction of a new yard in New Jersey; and construction of a short tunnel in the South Bronx connecting the Northeast Corridor to Metro-North's Harlem and Hudson Lines.

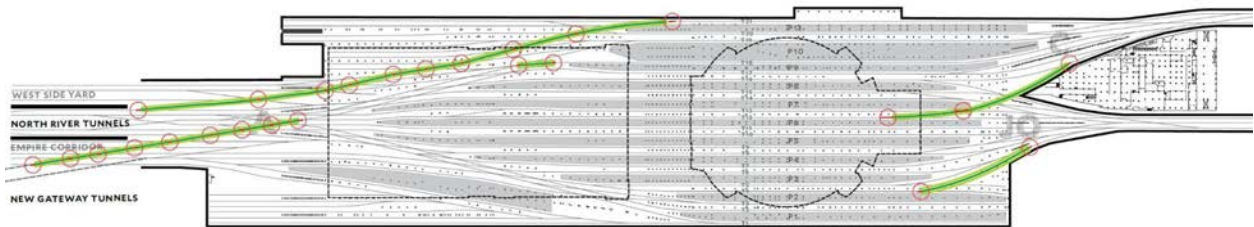
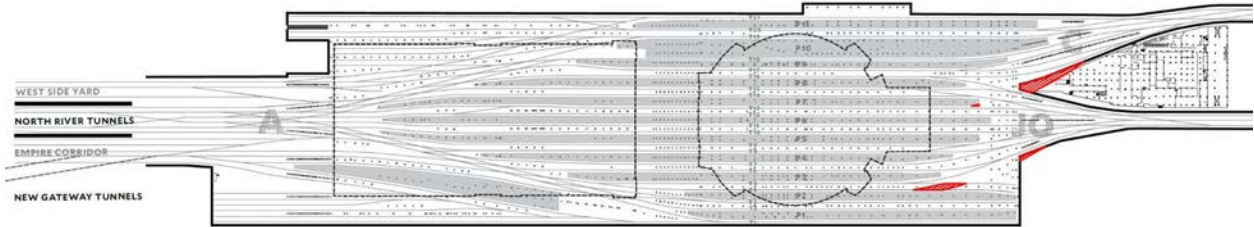
Current track layout



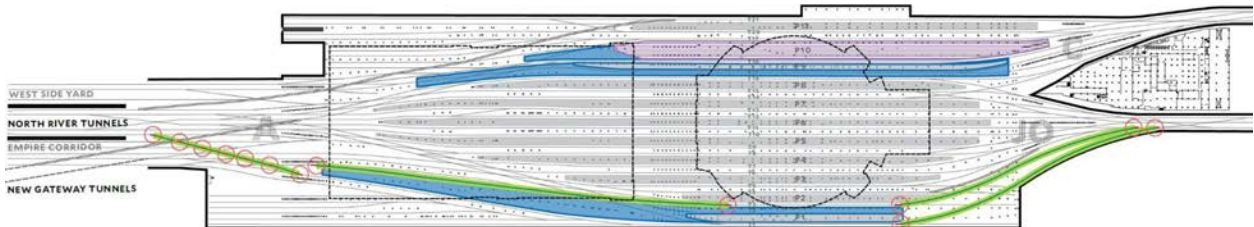
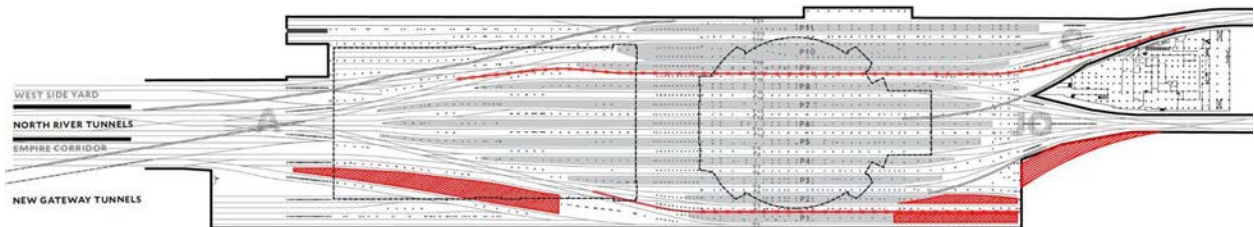
Proposed track layout



Construction Phasing: Phases 1 and 2

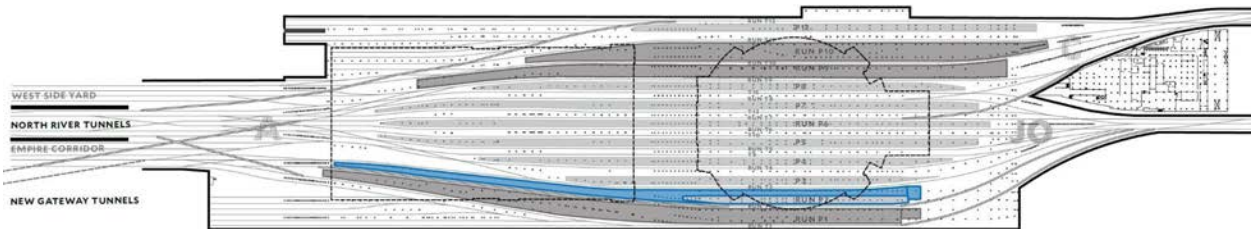
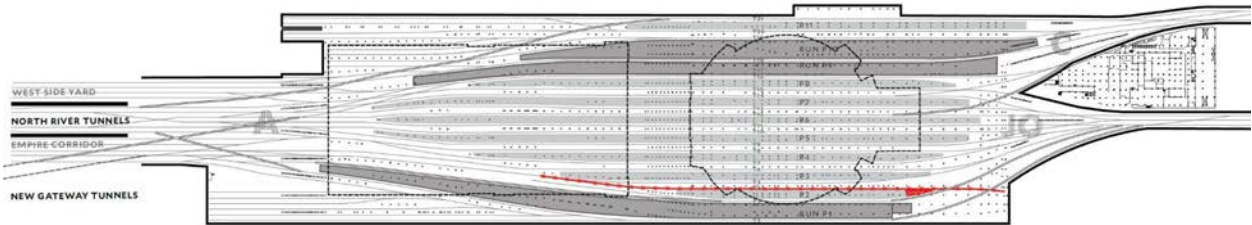


Phase 1: No tracks out of service at peak. Preparatory to major work

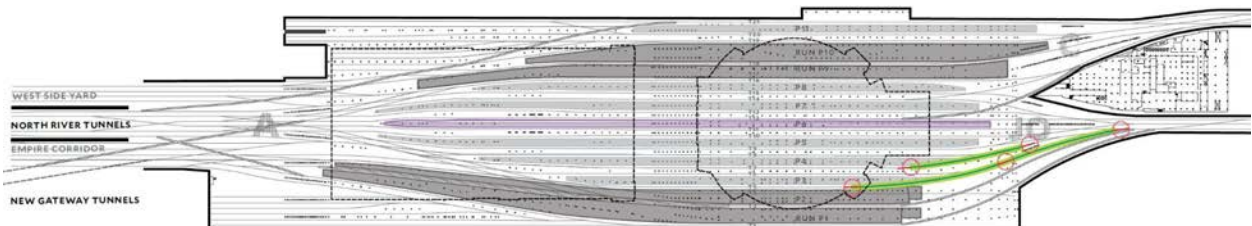
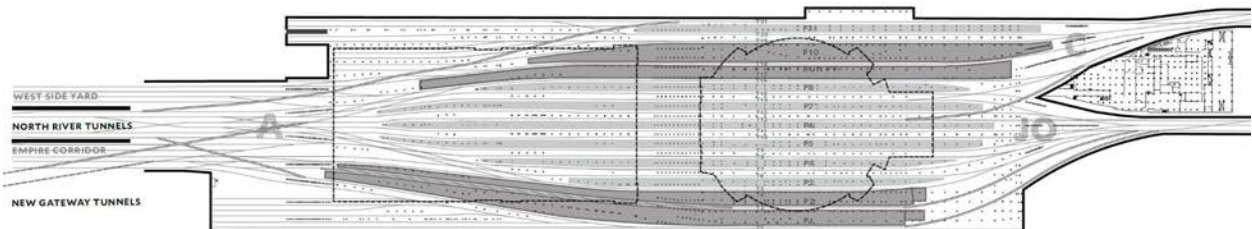


Phase 2: Partial through running begins. "Drop and Go" service continues as at present, while trains that currently turn in the station instead become through-trains. Tracks 1-3 and 17 taken out of service; Tracks 2 and 17 are removed so that Platforms 1 and 9 can be expanded; Tracks 1 and 3 realigned and connected to East River Tunnels. Platform 10 is also expanded and vertical circulation is added.

Construction Phasing: Phases 3 and 4



Phase 3



Phase 4

Track 4 removed so that Platform 2 can be expanded; Vertical circulation added to Platform 6. After the conclusion of Phase 4, there are two fully upgraded platforms for eastbound and westbound commuter trains. These platforms can be used by through trains without staged boarding, significantly increasing capacity. Platform 6 is reserved for Amtrak trains, and additional vertical circulation allows quicker boarding and alighting. Following this stage, sufficient capacity exists to sequentially take tracks out of service, alternating between eastbound and westbound tracks, until the whole station is upgraded.

Our costs estimates for all elements of this proposal are based on recent comparable MTA and NJ Transit projects, published project budgets for the Gateway Program and other major investments, and a 2021 MTA study looking into a different through-running concept at Penn Station:

1. Improvements to Track Alignments and Platforms at NY Penn Station (\$4.5 Billion)
2. New Sunnyside Station (\$0.075 Billion)
3. New Station at Port Morris & Cross-Bronx Tunnel (\$1.5 Billion)
4. East of NY Penn Yard (\$1.5 Billion)
5. Other System Improvements beyond Gateway Program (20% allowance for adjustments to existing proposals - \$2.175 Billion)

Specifically, to the first and largest line item required, the MTA estimated that completely reconstructing the tracks and platforms in the central $\frac{2}{3}$ of Penn Station (including replacement of the full column grid) would cost approximately \$3 billion.⁵ We have scaled that estimate up to account for the larger number of platforms and tracks we are proposing to modify, but we would also note that we believe our proposed scope of work at the platform level is significantly lower than that envisioned by the MTA in their proposal, particularly in that we would only replace an extremely limited number of columns. Our proposal is specifically designed not to require full column grid replacement.

Overall, this is a total of a maximum of less than \$10 billion; By comparison, the combined cost of the GPP and associated proposals is at least \$18 billion. We also believe that our estimate is a worst case scenario; while we have, for example, increased the budget for the whole Gateway Program by 20% to account for potential changes to it required by our plan, we do not believe it is reasonable to expect that those changes would be nearly that substantial.

For \$10 billion, our proposal would be able to accommodate 48 TPH per direction at the peak with room to spare⁶ - a larger number of trains than is projected to be covered by

⁵ This is per their May 2021 presentation to the Community Action Working Group.

⁶ Assume 6 Amtrak trains per hour per direction and 42 commuter trains; each Amtrak train would be scheduled for a 15 minute headway, and each commuter train would be scheduled for a 6 minute headway. This is in line with current practices for Amtrak and is more conservative for commuter trains than that on similarly busy systems like London's Crossrail or the Paris RER; the busiest station on the RER serves more passengers than Penn Station and more peak hour commuter trains than Penn Station

the current proposal.⁷ Additionally, our proposal would allow the vast majority of Amtrak and commuter trains to use dedicated tracks at the peak so that there would be limited interaction at the track and platform level between the services.⁸ This would provide significantly easier wayfinding within the station for passengers, particularly long distance passengers.

We would also additionally note that, with slight modifications to its own assumptions that brought it closer in line with international best practices, even the MTA's own version of through-running presented to the Community Action Working Group provides a superior level of service in Penn Station than the GPP would. The posited 8 minute headways in that proposal are significantly longer than would be technically required and are not supported anywhere in the documentation provided to the Working Group. They are significantly higher than international standards on similarly busy lines with suburban rolling stock; If they are even adjusted to 7.5 minutes from 8 minutes, then the proposal as a whole outperforms the MTA's preferred alternative.

A number of specious objections or red herrings have been raised to elements of this proposal. None of them hold water. Those objections include:

1. *Through-running cannot provide as much service to Midtown Manhattan as a terminal; Through-running would reduce capacity at Penn Station, not increase it.* As demonstrated above, when compared to the MTA's preferred Penn Station expansion, through-running provides a comparable level of service between Manhattan and New Jersey and a superior level of service between Manhattan and Long Island, Queens, the Bronx, Westchester, and New England. This is not to mention the provision of entirely new service patterns not provided by a terminal.
2. *Through-running would cost too much to be worth an "incremental" capacity increase.* Through running both costs less and delivers a greater service improvement when compared to a terminal. It is not incremental, it is transformative.
3. *Foreign examples of where through-running trains operate more efficiently (such as Crossrail or the RER) are not comparable to Penn Station because Penn Station would be too busy.* The busiest station on the RER carries more commuter rail passengers than Penn Station, and does so on only 7 tracks

on just 7 tracks. With those assumptions, there is space to schedule an additional 3 commuter trains per hour per direction or one additional Amtrak train.

⁷ The GPP and associate proposals would serve 48 peak eastbound and 40 peak westbound TPH.

⁸ The services would share tracks outside of Penn Station under any medium-term scenario.

(Chatelet - Les Halles). Multiple stations on the Elizabeth Line were projected to be as busy on a per track basis as Penn Station was before the pandemic.

4. *Through-running at Penn Station is a good long term goal, but the best way to achieve it is to expand Penn Station first and only then implement through running.* Expanding Penn Station before implementing through-running would make through-running dependent on the construction of additional tunnels to the east of Penn Station, which would conservatively cost in excess of \$10 billion at current New York City price levels and take decades to construct. Moreover, it is not clear what the design of the Penn Station expansion even is, much less whether it truly would support some theoretically through-running system constructed in 2080.
5. *Through-running can't work because Tracks 1-4 are too shallow to tunnel under the 6th Avenue Subway/PATH. As a result, you can never use Tracks 1-4 for through-running service.* We are not proposing to do any such thing, but to connect Tracks 1 and 3 to the existing East River tunnels west of 6th Avenue, making this a moot point.
6. *It is not feasible to have through-running trains on Tracks 17, 18, and 19, and it is technically impossible to have through-running on Track 21.* No support was given for the assertion that through-running is not feasible on Tracks 17, 18, or 19. Because Platform IX is already extremely wide, no significant work would be required to allow Tracks 18 and 19 to run through. Moreover, Track 17 is replaced by wider platforms in our proposal. Track 21 previously connected to the North River Tunnels, and could do so again. Minor changes to the platform may be required and are budgeted for in our proposal, that may or may not require the platform to be slightly shorter than the others in the station (though still long enough for many trains in the station to fully platform there, as it would be at least 10 cars long).
7. *The Americans with Disabilities Act (ADA) makes it impossible to implement through-running on expanded platforms without completely replacing the column grid because of the need for column spacing at the platform edge.* Our proposed station would not require trains to board and alight on opposite sides of the train car (i.e. on separate platforms), although we have studied the option and believe it has merit. Each train would have at least one fully accessible side (i.e. all doors to the right or left of the train would be accessible), satisfying the ADA. The MTA is also likely to face significant litigation if its own proposal to completely revamp Penn Station does not result

in a fully accessible station. It has lost similar lawsuits over its redesigns of subway stations in the recent past.

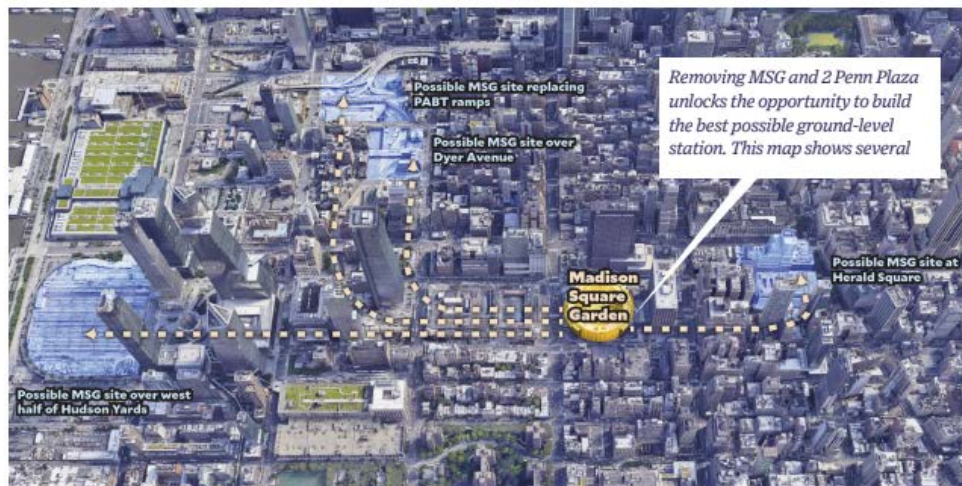
8. *Through-running would require ripping up three major recent infrastructure projects and starting over: Moynihan Station, the West End Concourse, and Harold Interlocking.* Through-running requires adding additional stairs and escalators to the West End Concourse and Moynihan. Adding stairs next to the existing stairs would not be considered “ripping up the station” by most people. Such a change, moreover, would be an unequivocal win for commuters. We designed our proposal to be compatible with the post-East Side Access plans for Harold Interlocking, as they were briefed to us on a tour of the East Side Access cavern. We would also note that the official plans for the Northeast Corridor envision significant reconstruction of Harold Interlocking over the next 15 years.

III. BUILDING THE BEST POSSIBLE PENN STATION: MADISON SQUARE GARDEN NEEDS TO MOVE FOR A FIFTH TIME

What are potential new locations for Madison Square Garden? There is no compelling reason why there needs to be a sports arena on top of Penn Station. Several locations in the immediate vicinity offer the same level of connectivity. Where are other potential locations for Madison Square Garden?

MSG's current location is dependent on a ten-year operating permit set to expire in 2023, as well as generous tax breaks. These two granted benefits can be used to leverage a move of the Garden to a more optimal location.

ReThinkNYC has identified relocation sites at Hudson Yards, at Herald Square and sites adjacent to or currently occupied by bus ramps for the PABT (shown in the map below); and there are other possibilities proposed by other organizations, PAU Chakrabarti and the late Hugh Hardy).



Governor, MTA and transit officials continue to fail to see the once in a century necessity and opportunity to get Penn Station right by relocating Madison Square Garden.

Again, New York Penn Station, the largest transit hub in the Western Hemisphere, with 650,000 daily commuters, will never function properly while Madison Square Garden sits on top of it. This horrendous condition will continue under the GPP and Master Plan. As long as politicians and transit officials bow to private interests and leave Madison Square Garden in place, it will be a blow to human-scaled station design as well as an operational transit nightmare; the number of future commuters is certain to increase

post Covid 19 and will reach 800,000 in the near term. The GPP and Master Plan place the incremental convenience of sports and concert attendees over the needs of New York's commuting population and denies all the great public realm that could and once was Penn Station.

ReThinkNYC maintains that the failure to move MSG to any number of reasonable nearby sites ([six total are surveyed in our attachment⁹](#)) demonstrates a tragic lack of courage and creativity to remake and rebuild Penn Station into the 21st century transit hub for unified regional transit that New York needs and demands. The Moynihan Train Hall can only be expected to accommodate 20% of Penn Station passengers; a positive development that hardly solves the problem.

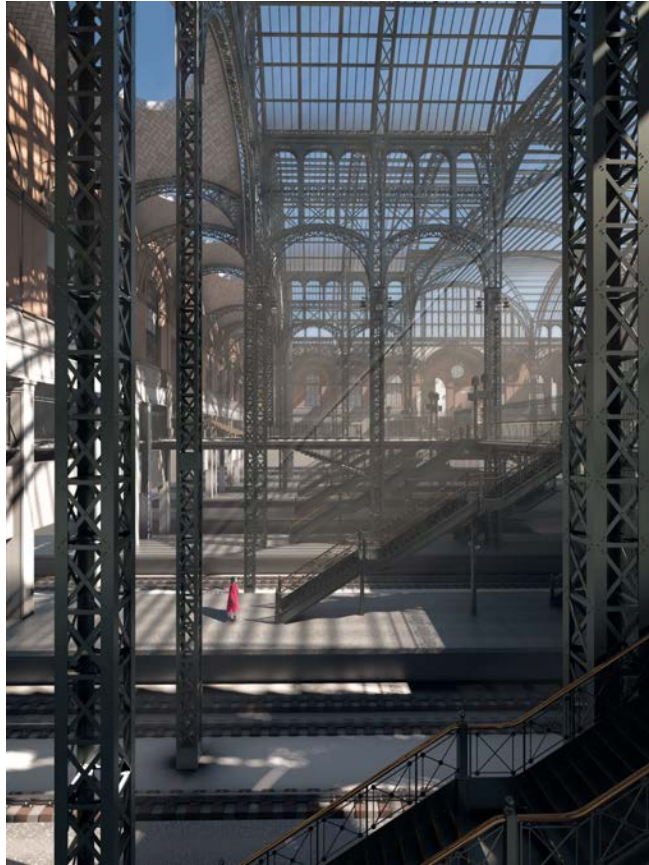


A new Madison Square Garden, reimagined for illustrative purposes, located at 34th Street and 6th Avenue. Rendering by Richard Cameron

ReThinkNYC's architectural lead Richard Cameron is also quick to point out that "a new, improved and relocated Madison Square Garden would further burnish our New York-ness, MSG must continue its legacy at a fifth location where it can fully meet the demands of a modern 21st century sports arena."

⁹ https://drive.google.com/file/d/17NknPzrhf6rhO_OHyOF9rzWP6_qB-CGW/view?usp=sharing

IV. REBUILDING THE ORIGINAL PENN STATION HARMONIZED WITH A THROUGH-RUNNING MODERN CIRCULATION PLAN AND REGIONAL UNIFIED TRANSIT NETWORK: WHY REBUILDING THE ORIGINAL PENN STATION IS THE BEST COURSE OF ACTION



*The 8th Avenue train concourse could be converted to modern rail operating plan including through- running and returning an appropriate sense of entry to people commuting to or visiting New York
Rendering by Jose Hernandez, Experience Penn Station.*

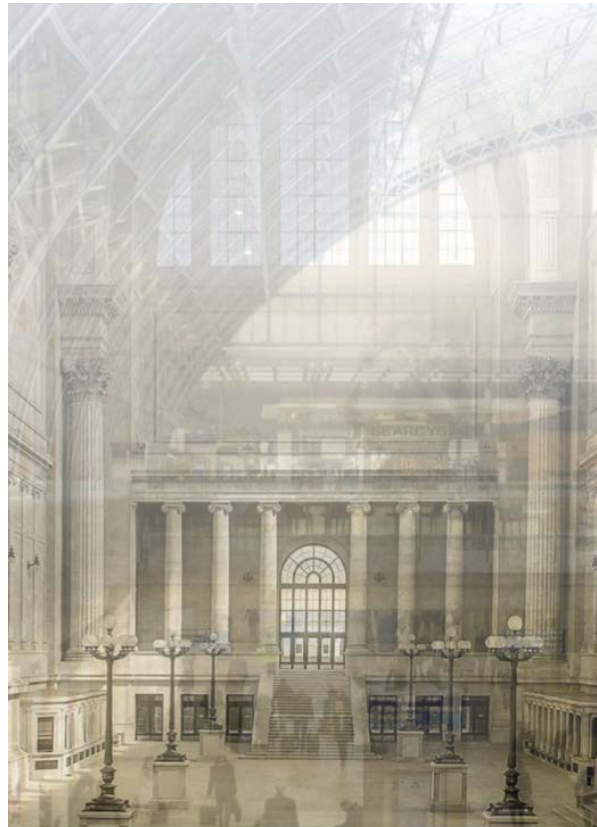
As will be set forth below, RethinkNYC believes that a reconstruction of the original Penn Station modified for today and projected capacity needs and new technologies is the superior plan for Penn Station on any number of counts. Modern construction techniques and computer-generated design make recreating the original station practical and cost effective.

It bears emphasis and repeating at the outset that such a reconstruction, which would utilize and follow the original Penn Station's foundations which still exist, would make

extraordinarily good use of the benefits of through-running. We repeat, transit decisions should be made first and then we can decide the best station design to follow.

At Penn Station, by reducing the number of tracks, the platforms could be widened and doubled, or at times, triple escalators could be added. In the style of London's St. Pancras, the historic (albeit rebuilt) original Penn Station with through-running would catapult Penn Station into a gateway to the City that would be the envy of the world. New York's (siloes at present) commuter lines and Amtrak are a net advantage to New York, at least domestically, and rival New York's deep water port as a driver of the region's economy. However, this network operates at far below its potential and is cursed by many for delivering soul-crushing commutes including frequent tunnel delays and topped off by passing through the travesty that is today's Penn Station.

ReThinkNYC's proposals would finally coordinate operations in a way that would take full advantage of New York's tremendous rail networks by implementing a regional unified transit network topped by a renewed version of one of the greatest train stations in the history of the world.



St. Pancras in London juxtaposition/original Penn Station

A. Building the Best Possible Penn Station? It is the original that fits that bill



“How tragic, how sad that so many Americans will never know what it was like to arrive in New York for the first time in your life at Penn Station. It was spectacular. If you had never been to New York before, you came into the city for the first time... and there you were in this breathtaking, man-made, wondrous, architectural place.”

David McCullough

Rebuilding the original Penn Station is not a pipe dream, a sentimental riff, or beyond our budget constraints. Rebuilding a building of this magnitude, especially when the original foundation still exists, is far more feasible than how the proposal is often portrayed. Reconstructions of substantial historic buildings are commonplace in Europe. Dresden, for instance, rebuilt much of its historic core, most importantly its magnificent Frauenkirche, resulting not only in restoration of civic beauty, but in massive economic benefit as a place where people want to visit and live. While not a reconstruction, the

saving and reconfiguring of St. Pancras Station in London referenced above injected an old building with the functionality and connective program to work as London's hub to the continent. The lower level, previously back-of-house, was converted into a concourse full of shopping and direct access to platforms above.

The Victorian Midland Hotel, attached to St. Pancras, was also restored, and has become an icon of the city; one representative of the recognizable brand of London. Were the same to happen at Penn Station and for the Hotel Pennsylvania and Stewart Hotel. The Hotel Martinique, a block away from the station, shows the glory that could be.



The entrances to the Hotel Pennsylvania, the Plaza and the Martinique (Left to Right). What a tragedy it would be to let the Hotel Pennsylvania be demolished when an appropriate restoration or adaptive reuse could add so much to our built environment and cityscape.

Each day (before COVID) over 600,000 people would pass through Pennsylvania Station. The proponents of the Governors plan predict that this number will exceed 800,000 in the not so distant future. The gateway to New York City is universally known as a dump. Upon exiting the train, passengers are greeted with strange smells, dim, flickering lighting, and narrow, dangerous, and overcrowded platforms. After using the stairway to access the concourse area, a fluttering array of confusing and unhelpful signage makes it nearly impossible to get where you need to go. There is no natural daylight and there will be little under the Governor's plan despite promises to the contrary. This user-experience renders Penn Station extremely difficult to use and an embarrassment in comparison to New York's global peer cities.

To address these issues, there have been many proposals to "fix" Penn Station. Nearly all of them have been lacking due to constraints imposed by the existing Madison Square Garden (MSG) and the 2 Penn Plaza office tower. Without physically relocating MSG and the tower, the track level will remain buried and the station's experience abysmal. The GPP and the Master Plan continue this tradition of lackluster plans that

skirt the main issues that make navigating Penn Station extremely difficult and, therefore, will inevitably fail as well.

There is a better alternative, but it requires a mindset with an understanding of the bigger whole. Our alternative learns from what other global cities have done in similar circumstances (again leaning on London and Paris) and proposes a station focused on people and their daily experience with the station. New Yorkers deserve something that is better than the present day experience, and worthy of the original grand station.

B. Penn Station today



What is it like to navigate Penn Station today? The entrance into New York City that Penn Station offers is abysmal compared to stations in its peer cities. Ceilings are low, and daylight non-existent. Platforms and corridors are crowded, and the commuter waiting areas, divided by agency, are too small to handle the number of passengers waiting for their track announcement. Compared to any train station in other great cities, like London's St. Pancras, and especially to Penn's counterpart across Midtown in Grand Central, Pennsylvania Station is a miserable experience for the incredible number of people who pass through it.

C. How does Penn Station's current operations impact its usability and experience?

Penn Station's function as a terminal creates severe usability issues for trains entering and exiting the station. Operation as a terminus creates severe usability issues for passengers as well. Narrow platforms on the track-level and tight stairways create

dangerous overcrowding and backups that affect the entire network. Backups on the network stall trips, contributing to unbearable overcrowding in the station's waiting area.



Penn Station's split operations between Amtrak, the MTA, and New Jersey Transit also creates significant usability issues. Each of the agencies maintain separate concourses; three small concourses rather than large unified concourses creates overcrowding and bottlenecks in passenger flow. Likewise, signage and wayfinding is not unified between the agencies, and transferring from one network to another involves multiple ascents and descents through Penn Station's maze.



*"The Pennsylvania Station in New York is like some vast basilica of old that towers above the terror of the dark as bulwark and protection to the soul."
Langston Hughes*

D. Was the station's experience always this bad?

The photograph above shows the original Penn Station (1910-1963) that came before its present-day counterpart. The design of the building, by the then-renowned firm of McKim, Mead and White, merged the language of classical architecture with the industrial modernity of electric trains and cosmopolitan urbanization. It stretched over two blocks, and is remembered for its grand concourses and magnificent natural daylighting on the track-level.

Despite being built by the private initiative of the Pennsylvania Railroad Company, the station instantly became a civic asset to the rapidly growing city. New Yorkers had a monumental entry into their city that rivaled and surpassed those of Europe's capitals.

The original Penn Station evoked a feeling: "Here is New York."

E. What was lost when Penn Station was demolished?



Painting by Patricia Melvin

By the 1950s, long distance railroad companies were struggling against competition from highways (heavily subsidized by the federal government), and the rapidly expanding airline industry which offered much faster service.



August 28, 1963.

Penn Station's Modest Contribution to the March on Washington

Photo by Robert Parent.

In 1962, the Pennsylvania Railroad Company made the decision to raze the above-ground structure, and erect an office tower (2 Penn Plaza) and Madison Square Garden. The owners of Madison Square Garden agreed to locate in the area after flirting with relocating to the suburbs, with the offer of a thirty-year contract with zero property tax. Acceptance of these terms was a desperate measure to retain a much needed asset within city limits. The Pennsylvania Railroad Company (Penn Central) would declare bankruptcy in 1970.



The new experience for passengers below was subterranean, bleak and cramped. Rather than off-boarding passengers into a multi-story concourse filled with natural daylight, the new track level was buried well below street level under the new Madison Square Garden. Penn Station went from a quintessentially urban experience into a tacky and depressing transient hub for suburban workers looking to avoid as much as possible the city surrounding them.

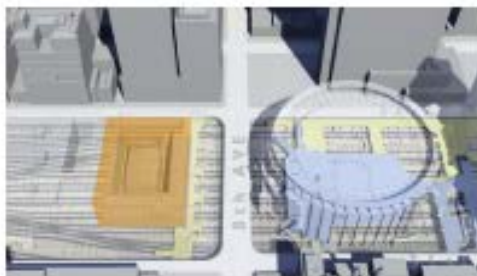
The city is still held hostage by past decisions. Today, Madison Square Garden's location above the tracks remains the prime obstacle preventing a station worthy of the original.

F. Current proposals for Penn Station

The new station can take many forms. Which is best? Over the last decades, there have been proposals on how to solve the problems of Penn Station's dismal experience. In 2013 the Municipal Arts Society hosted a competition of architectural conjectures from prominent designers and firms. The entries had varying levels of practicality, but all made an attempt to propose a new landmark for the city. More recently, Vishaan Chakrabarti and his firm PAU proposed keeping the Garden's structure as an atrium for the station.

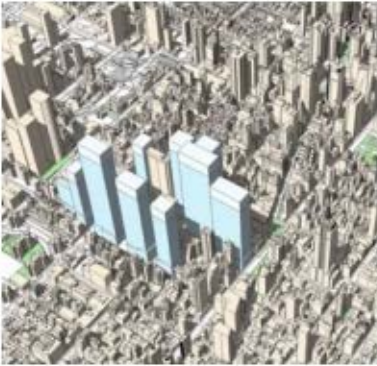
There are two criteria that should be used when evaluating any proposal for the future of Penn Station and its surrounding area:

First, any proposal must unlock the greatest proven value for the city. Second, it must be, as much as possible, an unregrettable improvement over not just the existing station, but also equal the original edifice, still in the memory of the city.



Moynihan Train Hall (Highlighted Orange) accesses only the reduced platforms of the west, providing little benefit for the vast majority of travelers through the station complex.

The recently opened Moynihan Train Hall is a welcome addition to the Penn Station Complex, but its location across 8th Avenue makes it useful for only a fraction of passengers. It directly connects to only the center-most five platforms (its subterranean passage connects to more), and being at the westernmost extremity of each platform, it's only useful for commuters working to the west of Penn Station.



Where a once great train station sat in the center of a McKim, Mead and White three-pronged composition, a centipede style atrium, shoehorned between Penn Station and 2 Penn Plaza, will bring a fraction of natural light to the station from its perch in a valley of supertalls which will have no height restrictions. Rendering by MTA.

G. The current plan for Penn Station repeats the same old mistakes

The preferred plan leaves Madison Square Garden atop the core of the station. Additionally, 2 Penn Plaza, the office tower on the 7th Avenue side, is also kept in place

As long as Madison Square Garden remains on top of Penn Station, the experience of commuters will remain largely in an underground series of concourses and passages, with relatively lower ceilings and no reflection of the great city being entered. Replacing the blocks around Penn Station with bulky "supertall" office towers will block out whatever light there is left reaching the station, and completely overpower the scale of the district by repeating Hudson Yards' generic architecture.

Any plan that does not relocate Madison Square Garden does not address the core structural issue that afflict Penn Station, and the entire region that depends on it.

H. How to create real civic and economic value at Penn Station?



What would a better alternative to the Empire Station Complex look like? Grand Central Terminal, Penn Station's counterpart in Midtown East, offers a real example of a great public space.

How does Penn Station compare to Grand Central Terminal? On the other side of Midtown, Grand Central Terminal plays as Penn's successful counterpart. Its century-old grandeur has been preserved, adapted, and expanded; now it anchors the most valuable real estate in the nation: East Midtown.

The terminal is a joy to walk through, full of beautiful interconnected spaces, new restaurants and retail, vibrant food markets, and connections to adjacent office buildings. Images of Grand Central's famed concourse, constellations painted on its vast ceiling, and sunbeams streaming through colossal archways, are intrinsically part of New York's brand to the world. Entering Grand Central, even daily, gives a spiritual jolt to the visitor that would be the envy of any organized religion. Like the city's famous art deco skyscrapers and suspension bridges, its image draws global eyes to the city. This value alone dwarfs the cost put into its construction and restoration. It is to be remembered that Grand Central Terminal frequently places in the top three tourist attractions for New York's important tourist industry.

I. What value does Grand Central create for New York?

Blocks in Manhattan within walking distance from Grand Central Terminal are the most expensive real estate in the entire country. This is because the terminal merges both beauty and function. Beautifully preserved historic architecture expands into a network of vibrant passageways, connections, dining and retail nodes; all linking the neighborhood both below ground and above ground.

Grand Central doesn't just improve its immediate vicinity, it also adds value to the entire real estate market north of Manhattan on Metro-North Railroad. Commuting to Grand Central for many home buyers is considered a much more attractive value offering than into Penn Station. This increases real estate value throughout the entire upstate area. Direct access to Grand Central is a major asset.

J. What are the key steps to recreate Grand Central's value in West Midtown at Penn Station?

In order to maximize the potential of Penn Station's redevelopment, a good track level plan must be matched with a great above ground station. Here is what has to happen to transform Penn Station into a great public space for all, on-par with Grand Central:

1. Madison Square Garden and 2 Penn Plaza must be removed from the site.
2. To achieve this, a new location for MSG with equal access to transit must be offered.
3. Penn Station's operation as a terminal hub by separate agencies must be addressed.

Section Three shows how the ReThinkNYC Plan addresses these operational issues with through-running service. Section Four shows our recommendations for where to relocate Madison Square Garden, the fifth move in its history. The following pages show our plan to maximize the above ground station's opportunity with the construction of an adapted version of the original Penn Station.

K. Why not consider rebuilding the original Penn Station?



Above shows what an adapted version of the original Penn Station's reconstruction would look like from Seventh Avenue. Rendering by Jeff Stikeman.

Moving the Garden makes a more ambitious station possible. The ReThinkNYC Plan posits that the best possible value for the city would be to replace what was lost in the 1960s demolition of the original building.

The City's contemporary architecture has merits, but New York's differentiating factor from new global cities is that it's simultaneously both modern and old (as example, New York has the largest collection of pre-war masonry-clad skyscrapers in the world). This historical texture creates a feel distinct from the sleek glassy built environments being constructed around the world. The GPP will obliterate a large swath of this New York pre-war masonry fabric and set the continued stage for eliminating New York's unique built environment in favor of a sterile and dense Dubai or Shanghai style of City. Rebuilding the original Penn Station modernized for current capacity and technology needs, while at the same time preserving or adaptably re-using much of the pre-war architecture in the Penn Station neighborhood, will maximize the brand impact and economic benefits at a rebuilt Penn Station in ways the the ESD GPP and the Master Plan's underground promises never will.

People and companies are attracted to unique cities that are able to maintain their historical feel. Paris, to cite one example, leverages its unique image as a strong global brand by protecting its feel and architectural legacy. Ignoring the possibility of adding a historic Penn Station to New York's urban tapestry would be a missed opportunity.

1. Adapting a reconstructed Penn Station

A reconstruction of the original Pennsylvania Station would not be an exact replica. Rather, it would have design upgrades so that it could handle the quantity of movement, and modern-day programming, necessary to fulfill its roles in the modern city. New pathways, public spaces, dining and retail, entertainment, and connections would be incorporated into the original architecture. The original Penn Station's reconstruction will come with modern environmental practices

- passive heating & cooling
- energy efficiency standards
- geothermal wells
- glass solar panels on the concourse level
- programmed space for social services where offices were previously located

This would be no different than how many such features have been added at Grand Central Terminal and St. Pancras Station were modified for modern usage.

2. How would this work?



Details of the [original Penn Station's Main Waiting Room recreated digitally](https://www.youtube.com/watch?v=4cL5ewk6l-k)¹⁰. Digital and other computer techniques make restoration of such details economically feasible.

¹⁰ <https://www.youtube.com/watch?v=4cL5ewk6l-k>

Many other cities around the world are restoring their uniqueness with varying reconstruction. Beijing is rebuilding many of its traditional Hutong neighborhoods. Frankfurt recently rebuilt its medieval town center, replacing a bland 1970s concrete block. Cities in Poland continue projects that have, since the 1950s rebuilt, urban fabric and monuments destroyed in the Second World War.

While most examples of large-scale reconstructions exist in Europe, the only thing missing is the will to do the same in New York City. The craftsmanship, access to materials, and new technology is all present and has already been used in a number of projects in the city.

One of the most relevant examples is [Robert A.M. Stern's North Hall and Library at Bronx Community College](#)¹¹. Situated on the North side of the quadrant of the Stanford White designed campus is Stern's McKim, Mead and White inspired design, which perfectly compliments the late 19th century campus yet bears a 2012 cornerstone.



One should remember that the Original Penn Station was part of a larger composition by McKim, Mead and White. This composition included the Corinthian-columned Farley Post Office (now Moynihan Train Hall to the West) and the Ionic-columned at-risk Pennsylvania Hotel to the East. This is one of the many reasons that the GPP, by removing zoning restrictions at the Hotel Pennsylvania and assuring its demolition instead of reuse, should be rejected. In this, and so many other instances, the GPP is encouraging the cannibalization of a uniquely New York neighborhood.

¹¹ <https://vimeo.com/361833402>



Buildings in the high-end residential and retail segments , especially in or near historical districts, have returned to design vocabularies using cut stone and ornament. There is a local industry devoted to the preservation of New York's historic architecture. In New York's many designated districts, cornices, stones, handrails, windows, plasterwork, fixtures, and many other elements require replacement.



A modern Penn Station would not be an exact reconstruction. It would be an evolution of the original building in the same way that Grand Central Terminal's functions have evolved over time. This rendering showcases restaurants and cafes populating the original main waiting room, along with changes in circulation and ticketing for a more modern and efficient programming of the space. Rendering by Jeff Stikeman.



90 West Street's facade was destroyed on 9/11, and its ornate masonry was craftily rebuilt using a combination of old skills and new techniques.



Frauenkirche in Dresden was a unique baroque Church that was destroyed near the end of WWII. For decades, only a corner survived. Its 21st century rebuilding restored the skyline of the city. Subsequently, surrounding blocks were rebuilt, giving Dresden a new center with incalculable economic and social benefit: drawing and retaining its citizens.

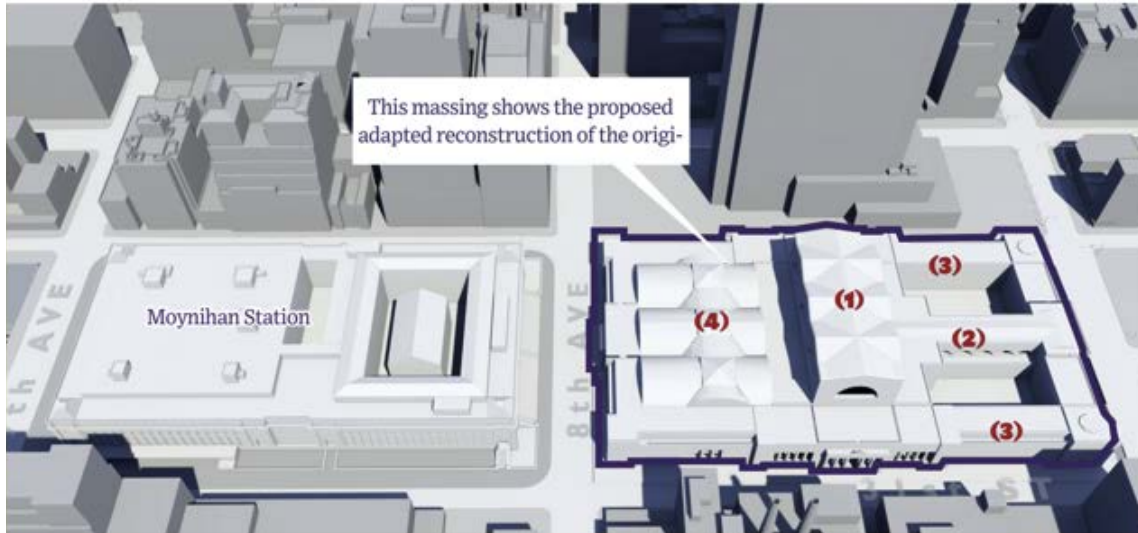
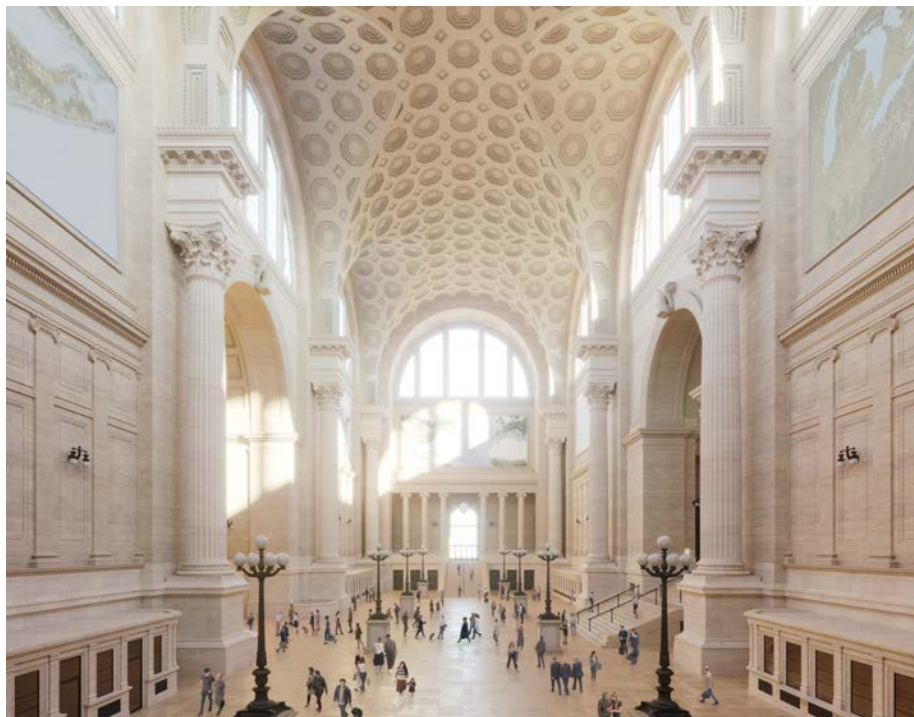


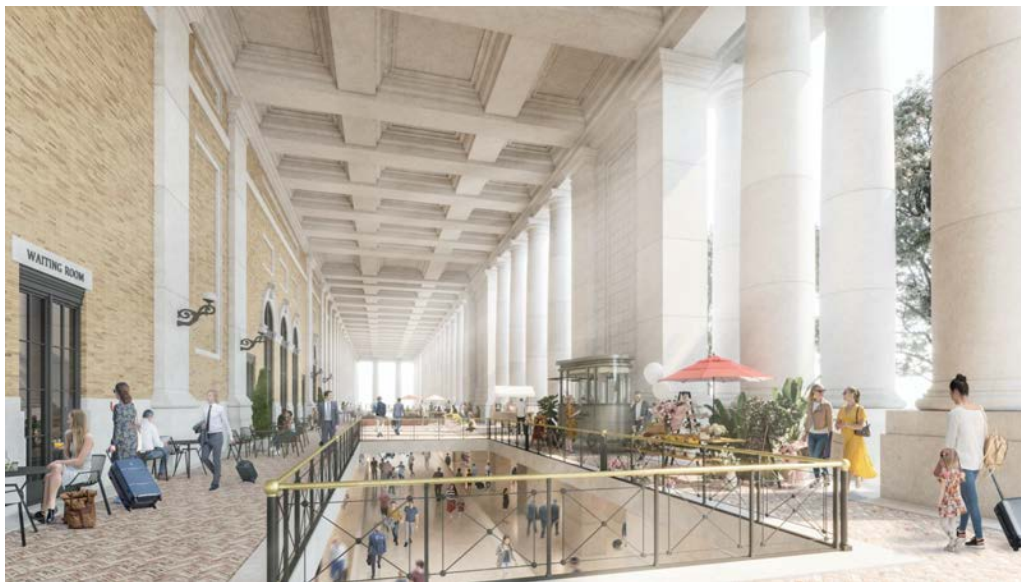
Image key for perspectives.



This space (1. in the graph above) connects all areas of the station to one another. Like Grand Central, adaptations can be applied for dining, retail, etc. Rendering by NOVA.



This passageway (2. in the graph above) was and could be retail-rich procession between the main 7th Avenue entrance and the commuter trains. Rendering by Nova.



Original carriageways (3 in the graph above) can be converted into a multipurpose extension of the streets and station (3. in the graph above), while creating a ramped (ADA compatible) access to trains below. Rendering by Nova



This proposal wouldn't be a brick-by-brick replication, but rather a functional update akin to the many aesthetically integral modernizations at Grand Central Terminal. Note the wide platforms and escalators made possible by the Stations conversion of most commuter rail to through-running (4. In the graph above) Rendering by Jeff Stikeman.

3. Summary: A new Penn Station should be as good as the original.

The current experience of using Penn Station is embarrassing for the city. Madison Square Garden suffocates the most used part of the station. Moynihan Train Hall is useful for only a minority of the station's commuters, and is accessible from only the western extreme of the central platforms.

Current plans keep the station below Madison Square Garden and 2 Penn Plaza. Currently planned changes add marginal improvements yet will cost \$7 billion.

Of all possible new buildings, harnessing the historical value of the original edifice offers the greatest brand-value for the city, and the grandest experience for the commuter. Rebuilding the original architecture takes away the regret of what was lost, and undoes one of the greatest crimes of urban vandalism. With today's technology and skill, there

is no obstacle to reconstruction. Costs would be comparable to any contemporary design.

Ada Louise Huxtable said of the decision to demolish the original Penn Station: “We want and deserve tin-can architecture in a tin-horn culture. And we will probably be judged not by the monuments we build but by those we have destroyed.” Ms. Huxtable’s quotes will remain true of New York today if the GPP and Master Plan and the gratuitous destruction they call for are allowed to go forward and we squander the opportunity to prove the destruction of the original Penn Station was all a huge mistake..



“...Murmurous with the immense and distant sound of time. Great slant beams of moted light fell ponderously athwart the station’s floor, and the calm voice of time hovered along the walls and ceiling of that mighty room, distilled out of the voices and movements of the people who swarmed beneath. It had the murmur of a distant sea, the languorous lapse and flow of waters on a beach. It was elemental, detached, and indifferent to the lives of men... Few buildings are vast enough to hold the sound of time, and... there was a superb fitness in the fact that one which held better than all others should be a railroad station.”V.

Quote from “You Can’t Go Home Again,” by Thomas Wolfe

V. HISTORICAL PRECEDENTS, PANDEMICS, INFRASTRUCTURE AND ARCHITECTURE - THE PAST AS PROLOGUE

It is important to note that the present pandemic – as outlined by Michael Lewis in his WSJ opinion piece of June 6th, 2020, “[Pandemic as Urban Planner](https://www.wsj.com/articles/pandemic-as-urban-planner-11591441201)¹²” – has only added to the need to “rethink” Penn Station. Lewis alludes in his piece directly to rebuilding the original station and the place such ‘rethinking’ would have on this important bellwether for the very future and viability of cities.

The original Penn Station, as Lewis rightly points out, was in some respects the lineal descendant of Philadelphia’s Waterworks and Fairmount Park, the Champs Elysée, the Arc de Triomphe in Paris, and the Thames Embankment, all of which were created in the wake of public health crises. The original Penn Station was also a peer of Union Station in Washington D.C., Grand Central Terminal, and Denver’s Union Station. These Stations prove the continued vitality and positive aesthetic of this style of train station architecture. Recreating the original Penn Station would bring similar vitality to New York City and beyond. The recreation of the original Penn Station would also stand as evidence to the resilience of New Yorkers both in correcting the architectural crime of the century in the original station’s destruction, and transforming our cityscape and region greatly for the better.

¹² <https://www.wsj.com/articles/pandemic-as-urban-planner-11591441201>

VI. DEMOLISHING THE PENN STATION NEIGHBORHOOD WILL NOT MAKE IT BETTER. THROUGH-RUNNING ELIMINATES THE NEED TO DEMOLISH 31ST STREET AND MANY OF THE SITES SLATED FOR DEMOLITION



The Pennsylvania Hotel, McKim, Mead and White (Left), the Gimbels Building, Daniel Burnham (Further down 32nd Street on the left) and the 32nd Street Skybridge, Shreve and Lamb (Straddling 32nd Street), as viewed when departing Penn Station (Demolished). The three sites will join Penn Station in being no more if the Governor's plan goes through

Photo by Larry Silver / Museum of the City of New York

The Governor's Plan and GPP will, urban renewal style, demolish most of the buildings surrounding the station including a block and a half of 31st Street and the Hotels Pennsylvania and Stewart and the Daniel Burnham Gimbels Building [among much other pre-war fabric](#)¹³ [See Powerpoint Deck of Andrew Cronson of Directly Impacted and Adjacent Historic Sites]. This will be done out of sequence, premised on false premises as to the need for a train station under 31st Street and based on the supposed ["blight" in the neighborhood](#)¹⁴, [See YouTube of December 8th, 2022 walking tour of neighborhood sponsored by Empire Station Coalition].

While we cover much of this elsewhere, why should we lose another piece of the heart and soul of this great city? This is doubly so for 31st Street, which is not required to be demolished in order to build a superfluous station under 31st Street, a/k/a Penn South/Penn Expansion. For what? More steel and glass monuments to displace apartment dwellers, destroy small businesses, demolish historic structures, and blot out the sun? The ESD GPP and Master Plan for Penn Station would cost billions and leave us with the mediocrity that abides in the basement of Madison Square Garden.

The ReThinkNYC proposals reject the GPP and the Master Plan's thinking—especially the need to impose this flawed thinking on the city from river to river[[link to Holly Leicht segment](#)]. Adding density near train stations, including this train station, can happen at numerous non-distinct pre-war one-story buildings in the neighborhood, many of which

¹³ https://drive.google.com/file/d/18tQkU_fbsDdfYD47M6wG5tirqZnOiDFI/view?usp=sharing

¹⁴ https://www.youtube.com/watch?v=oM4AGK_pGH4&lc=UgwBe9WW_ia5h7ZL1LZ4AaABAg

are already owned by Vornado. Rather than bulldoze the historic neighborhood into submission, we recommend celebrating the best of the best, frequently through preservation and adaptive reuse, while creating a vision of the future equal to the challenges wrought by the second half of the 21st century.

With the implementation of through-running and a great above-ground station, the once decapitated Penn Station will arise like a phoenix from the ashes with new pedestrian arcades on 31st and 33rd Street, clothed in glory like Grand Central Terminal, Washington's Union Station, or St. Pancras. Our plans will equip the city for the challenges of a new age where cities and the region are designed to be lived in, not endured.

VII. OTHER FACTORS TO BE ADDRESSED: VIEW CORRIDORS/NEIGHBORHOOD CONDITIONS STUDY

A. View Corridors



*Sophia Loren and Carlo Ponti lend Italian grace to the Roman architecture of the original Penn Station with the Empire State Building standing vigil for the metropolis we call home.
Bettmann, 1958*

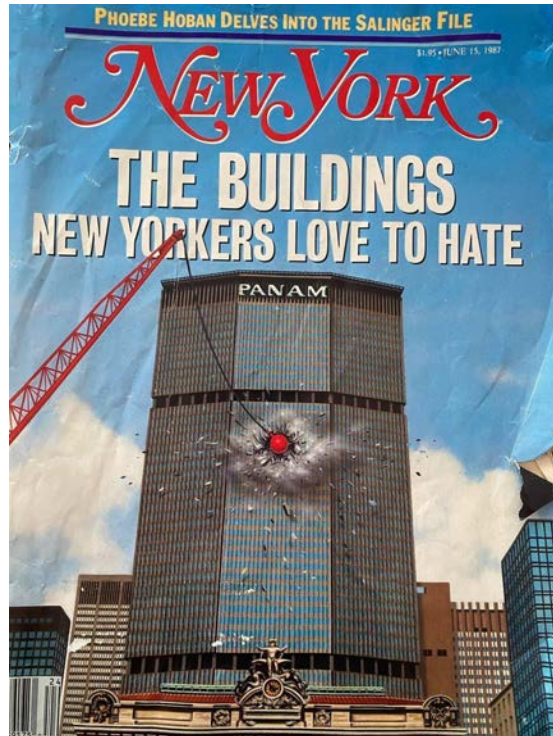
While most of our purely environmental objections are covered in Charles Weinstock's submission on our behalf, we supplement that submission on the issue of view corridors. Specifically, the GPP and Master Plan proposals for Penn Station will block the view of the Empire State Building, even after amendments to Governor Cuomo's original plan. Meanwhile, the powers-that-be have already approved a supertall building next to Grand Central Terminal, which blocks views of the Chrysler Building and marginalizes Grand Central Terminal. The Empire Station Complex which is proposed for Penn Station will fund incremental below ground (disgraceful) station improvements in exchange for major zoning variances for new construction on neighborhood properties somehow condemned as blighted.

Do we really need to treat our cityscape and skyline so cavalierly? While, many will shrug their shoulders fatalistically and say ‘that’s progress,’ or point out that ‘skyscrapers get eclipsed at some point -- look at the Singer and Woolworth Buildings.’ This case, however, is different and that thinking needs to change. The Governor and the GPP should be more sensitive to view corridors. The best example of why is the Pan Am/MetLife Building behind Grand Central. Had it not been built, we would have stunning, Paris-worthy views up and down Park Avenue of Grand Central Terminal and the French Renaissance New York Central tower just north of it. It is a signature view of New York that we have tragically lost.”



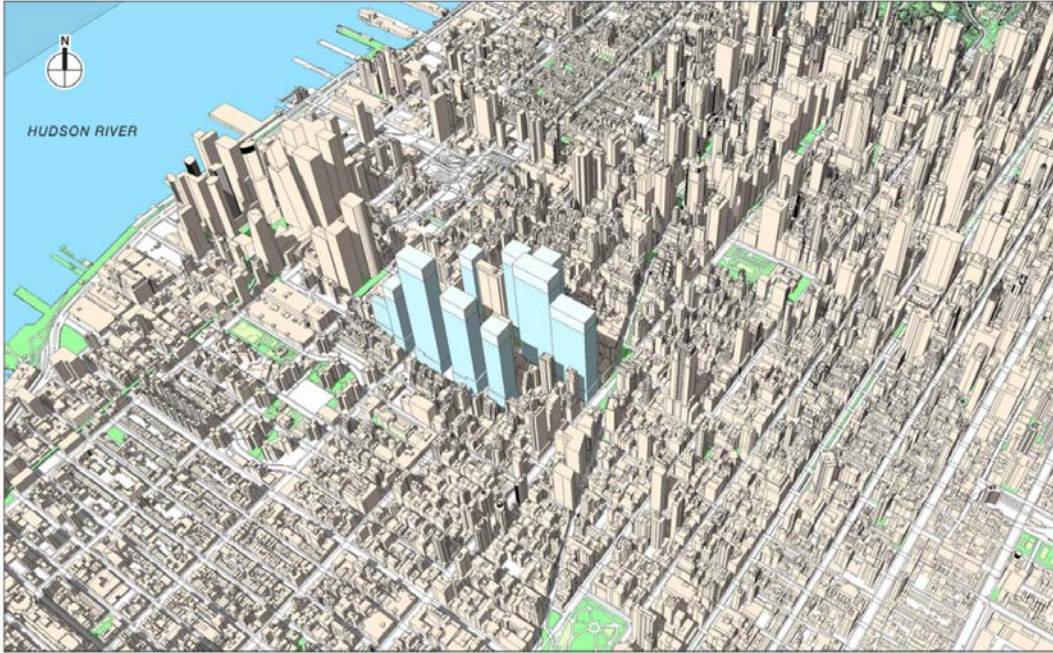
The New York Central Building (background) and Grand Central Terminal (foreground) before they were separated by hermetically sealed glass towers. Museum of the City of New York, 1948

ReThink NYC Architectural Lead, Richard Cameron, added, “When you lose too many of these vistas, you begin tampering with the identity of the city -- the result being a nondescript skyline that looks like every place else. While it is hard to put a price on it quantitatively, I am certain we will be paying and will continue to pay a very real price for treating the Empire State Building, our equivalent of the Campanile in Venice, and Chrysler Buildings this way. We are tempting fate. It makes no sense to do this. The Empire Station Complex should have been designed in ways that complement the Empire State Building and include it as a key feature -- not expunge it from the cityscape.”



*Had the Pan Am/MetLife building been built elsewhere, a signature, world-class vista would have been preserved for generations of New Yorkers.
New York Magazine, 1987*

While amendments to the GPP have improved the Empire State Building views incrementally from one vantage point, the changes are not enough. Like so much about the proposed Empire Station Complex, this is another anti-urban, anti-New York gash in the fabric of the built environment. If it proceeds, it will hasten the day when we all wake up and wonder whatever became of our city and its unique urbanism.



The massing study for the Empire Station Complex showing its proximity and similarity to the unloved Hudson Yards colossus. Draft Environmental Impact Statement for Empire Station Complex

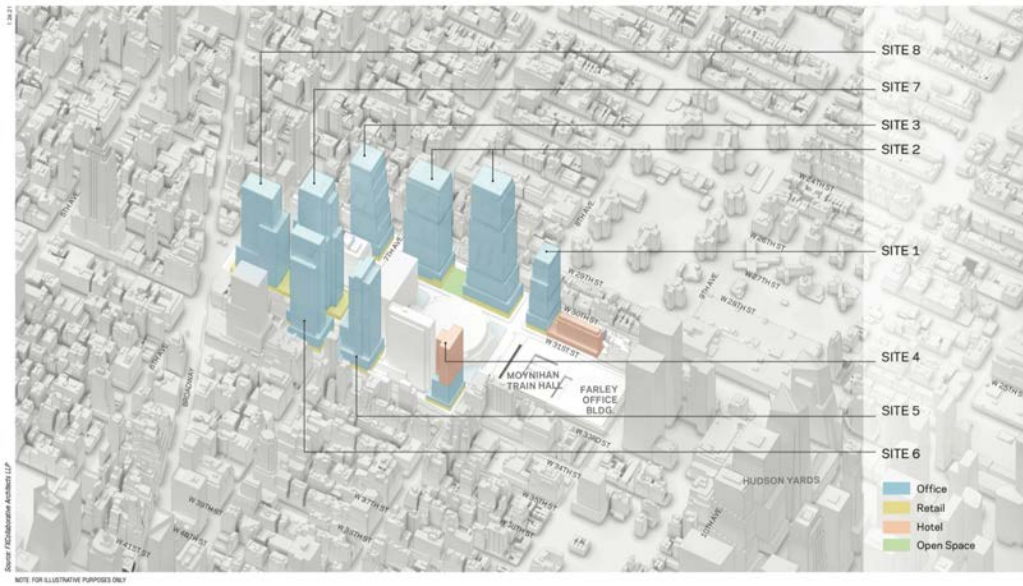


Existing Conditions



2038 With Action – Site 4, 5 and 6

The impact of the proposed Empire Station Complex on views of the Empire State Building looking east on 34th Street. Draft Environmental Impact Statement for Empire Station Complex



Building a “precarious urban monoculture”¹⁵ similar to the much-derided Hudson Yards.
Draft Environmental Impact Statement for Empire Station Complex



A soft hued, forgiving and self-serving rendering of the north towers of the proposed Empire Station Complex. Not shown are the south towers, which would extend for 1.5 blocks on 31st Street. They would encircle (and suffocate) Penn Station and rend the fabric of the neighborhood.

Vornado Realty Trust

¹⁵ https://drive.google.com/file/d/1CdxBoVC3Lx9LHQVJ5_sPxoQPasSrsAbao/view?usp=sharing

B. Discrepancies in the Neighborhood Condition Study

Our research shows serious discrepancies in the DEIS as to the number of impacted residents and businesses. Our study of the site indicates 1,296 businesses will have to relocate or go out of business and 2,371 families will have to relocate. The results come from official postal data and are as follows:

Site 1, Block 754 (31st – 30th Streets, 8th – 9th Aves (partial block))

Address	Building Type	Zip Code/Carrier Route
403 8 th Ave	hotel	10001-1804 C065
405 8 th Ave	commercial	10001-1804 C065
409 8 th Ave	commercial	10001-1804 C065
411 8 th Ave	commercial	10001-1804 C065
413 8 th Ave	commercial	10001-1804 C065
320 W 31 st St	commercial	10001-2705 C015
340 W 31 st St	garage	10001-2705 C015
301 W 30 th St	residential	10001-1804 C065

Site 2, Block 780 (31st – 30th Streets, 7th – 8th Aves)

Address	Building Type	Zip Code/Carrier Route
370 7 th Ave	office	10001-3067 C055
416 8 th Ave	retail	10001-1801 C014
412 8 th Ave	office	10001-1822 C014
408 8 th Ave	residential	10001-1813 C014
404 8 th Ave	residential	10001-1800 C014
204-214W 31 st St	commercial	10001 (unknown)
252 W 31 st St	residential	10001-2813 C052
254 W 31 st St	office	10001-2813 C052
209 W 30 th St	religious	10001 (unknown)

225-237 W 30 th St	parking garage	10001 (unknown)
239-241 W 30 th St	office building	10001-2823 C055
243 W 30 th St	commercial	10001-2812 C055
247 W 30 th St	commercial	10001-2814 C055
251 W 30 th St	residential	10001-2810 C055
259 W 30 th St	residential	10001-2809 C055
265 W 30 th St	residential	10001-2839 C055

Site 3, Block 806 (31st – 30th Streets, 7th – 6th Aves (partial block))

Address	Building Type	Zip Code/Carrier Route
371 7 th Ave	hotel	10001-3984 C054
369 7 th Ave	residential	10001-3987 C054
367 7 th Ave	residential	10001-3905 C054
363 7 th Ave	office	10001-3904 C054
151 W 30 th St	residential	10001-4007 C013
145 W 30 th St	office	10001-4006 C013

Site 4, Block 783 (34th – 33rd Streets, 8th – 7th Aves (partial block))

Address	Building Type	Zip Code/Carrier Route
460 8 th Ave	commercial	10001-1802 C18

Site 5, Block 783 (34th – 33rd Streets, 7th – 8th Aves (partial block))

Address	Building Type	Zip Code/Carrier Route
420 7 th Ave	commercial	10019 (unknown)

Site 6, Block 809 (34th – 33rd Streets, 7th – 6th Aves (partial block))

Address	Type Building	Zip Code/Carrier
433 - 435 7 th Ave	retail	10001-2001 C018

431 7 th Ave	commercial	10001-2001 C018
429 7 th Ave	retail	10001-2001 C018
427 7 th Ave	retail	10001-2001 C018
425 7 th Ave	retail	10001-2001 C018
421 7 th Ave	commercial	10001-2002 C018
144 W 34 th St	retail	10001-2102 C024
152 W 34 th St	residential	10001-2102 C024
137 W 33 rd St	commercial	10001-2903 C021
139 W 33 rd St	commercial	10001-2941 C021
155 W 33 rd St	commercial	10001-2903 C021

Site 7, Block 808 (33rd – 32nd Streets, 7th – 6th Aves (partial block))

Address	Building Type	Zip Code/Carrier Route
139 W 32 nd St	residential	10001-3206 C021

Site 8, Block 808 (33rd – 32nd Streets, 6th – 7th Aves (partial block))

Address	Building Type	Zip Code/Carrier Route
1275 Broadway	retail	10001 (unknown)

The USPS carrier routes of the buildings in the affected area show the following number of businesses and residential mail boxes.

TOTALS BY CARRIER ROUTE

Carrier Route	Residential	Business	Total
C013	27	147	174
C014	82	181	263
C015	435	109	544
C018	762	103	865
C021	2	259	261

C024	0	74	74
C052	416	138	554
C054	61	140	201
C055	6	128	134
C065	580	17	597
TOTALS	2,371	1,296	3,667

However, Section B. Principal Conclusions presented by the DEIS states, “The Proposed Project would directly displace an estimated 206 residents living in 128 residential units.” It also states, “the Proposed Project would result in the direct displacement of an estimated 9,137 employees and 473 firms. In Phase 1 (2028), an estimated 3,747 employees at 353 firms would be displaced. In Phase 2, an estimated 5,390 employees at 120 firms would be displaced.”

USPS data shows 2,371 (not 128) residential units, affecting approximately 5,000 residents if you conservatively assume two residents per mailbox.

Likewise, USPS data shows 1,296 business addresses, not the 826 cited by the DEIS. This undercount, especially that of residents in the affected area, serves to minimize the inestimable human trauma and economic damage of those who live and work in the affected area.

VIII. THE QUAGMIRE AT PENN STATION REPRESENTS THE REGION'S DIVIDED GOVERNANCE, ESPECIALLY IN REGARDS TO PLANNING, TRANSPORTATION, AND ECONOMIC DEVELOPMENT

A "Marshall Plan " for New York and it's immediate surrounding area, such as the RethinkNYC proposals, was needed for the balkanized metropolitan region even prior to the current pandemic. Infrastructure spending, particularly on a more integrated transit network, will resurrect the economic damage caused by the virus and restore public trust in the viability of a dense urban and suburban region such as New York.

The expansion of the region's economic core will make places like Newark, Paterson, Long Island City and beyond all part of a well connected whole, rather than a series of disconnected parts like today. The ReThinkNYC plan would enable people living in Newark to work in Sunnyside and people living in Brooklyn to work in Paterson or Hackensack.

However, the ReThinkNYC plan is not the end of the journey. The segmentation that mars the Governor's Penn Station Proposal is further impeded by the failure to consider Penn as part of numerous other infrastructure projects that are proceeding more or less simultaneously such as the Port Authority Bus Terminal, the LaGuardia AirTrain, and other work at the airports. ReThinkNYC is working towards additional recommendations that leverage these proposals as part of one larger region, a concept that we call the "Bigger Apple". Look for these recommendations in the near future.



Dan Doctoroff, Deputy Mayor for Mayor Bloomberg, [in a New York Times op-ed piece](#)¹⁶, recently pointed to the five-borough approach adopted to bring the City back from 9/11. RethinkNYC's expanded Bigger Apple regional transit proposals beyond Penn Station will be similar but with a multi-state palette and advocates for an empowered regional governance structure. Governor Cuomo's multi-state COVID response efforts, which stand apart from his downfall, show the benefits of such coordination. A new level of regional cooperation alongside integrative transit planning would open up neighborhoods to the growing economy, and create job-connected housing. This would integrate more communities economically and socially.

To summarize, the ESD GPP and the Master Plan does not take a regional approach to Penn Station's reimagination. This is largely in part because New York does not have the mechanisms in place today to do so. The region's fragmented governance makes creating plans between states and municipalities extremely difficult. ReThinkNYC believes that in order to maximize Penn Station's potential, a region-wide approach is necessary. We hope to initiate this approach at Penn Station and then integrate it into the myriad of disparate infrastructure plans that are proceeding in silos in New York and New Jersey.



¹⁶ <https://www.nytimes.com/2021/12/16/business/dealbook/doctoroff-als.html>

IX. ECONOMIC IMPACT: THE RETHINKNYC PLAN WILL MAKE THE REGION MORE ATTRACTIVE AND ACCESSIBLE TO 21ST CENTURY INDUSTRIES

Today, New York is stuck in a zero sum game between the forces of growth and maintaining a reasonable level of quality of life and cost of living for all. New York's unparalleled attractiveness for talent makes it an excellent place for healthcare facilities, knowledge companies, and educational institutions to locate. This desirability gives New York the opportunity to diversify its economy and insulate itself against future economic downturns. New York's rapid growth over the last two decades has had its consequences. Due to capacity limitations, the more new people who move here, the harder it becomes for others to stay. The Subway is full, Midtown has no room for more new construction, and neighborhoods with good access to transit have been gentrified. The choice between New York expanding economically and remaining a place for everyone to live however is a false one.

Strategic, region-wide transportation planning is the foundation to overcoming New York's capacity issues; taking full advantage of its present economic opportunities, and making the region the best place to be for all. The ReThinkNYC plan takes this approach. With its comprehensive infrastructure strategy, the ReThinkNYC plan will expand the menu of locations for companies to settle, whether it be in healthcare, tech or education. Increasing accessibility in cities like Newark, Paterson, East New York, Elizabeth, Long Island City, Sunnyside, Jamaica, Port Morris in the Bronx, White Plains and elsewhere. It will create wide-ranging jobs for all. Expanding New York's core beyond Manhattan will leapfrog its housing capacity, reduce the region's cost of living dramatically, and democratize its economic expansion.

Building a bigger Penn Station Terminal will essentially maintain the status quo. It will double down on Midtown as the region's only central business district, make high value development outside of the traditional core extremely difficult, limit the region's growth potential, and do very little for local economies outside of Manhattan. With a new approach to the region's transit network, exponentially greater housing, office, and transit capacity can be achieved. The ReThinkNYC plan offers this.

X. REITERATION OF OUR PROPOSAL

RethinkNYC, based on the above, requests that the GPP and the Master Plan be scrapped in its entirety. Rather, a new plan should be quickly created and should include the following components which generally follow those included in our August 20, 2020 submission to New York State but have been updated where appropriate:

A. Penn Station and the Moynihan Train Hall

The transit Plan for Penn Station and the Moynihan Train Hall should be converted to the through-running model of operations called for in this submission. The transit plan at Penn Station needs to be harmonized with the Gateway, Sunnyside Yards. All recent transit modifications like the Brooklyn Queens track revitalization and Port Authority Bus Terminal initiatives, among others, should be such that Penn Station's conversion to a "through-running" station, with greatly enhanced regional transit hubs and reutilized abandoned rail lines takes place; in order to inaugurate a fluid and unified commuter rail network for the New York Metropolitan Region. While not the province of the ESD, ReThinkNYC asks that federal funding be halted and an independent, internationally infrastructure firm with experience implementing through-running in a peer international city is retained to thoroughly evaluate how through-running can be implemented within the footprint of the existing Penn Station/Moynihan Train Hall.

B. Madison Square Garden

Madison Square Garden should be moved to one of the four locations recommended above by RethinkNYC.

C. Conversion to Through-Running

Penn Station's conversion to a through station should be accompanied by the rebuilding of the original McKim, Mead and White Station with a modernized circulation plan and transit technologies as part of an adaptive reuse of the 34th Street/Hudson Yards area.

D. 31st Street Demolition

31st Street need not and should not be demolished. Historic sites should be preserved or adaptively reused to the greatest extent possible. As part of the adaptive reuse of the 34th Street/Hudson yards area, the moving of Madison Square Garden to Hudson Yards (with three alternative sites listed in our plan), preserves numerous buildings and streetscapes (e.g., the Pennsylvania Hotel and the block south, East Side of 6th Avenue/Broadway between 34th to 31st Street, resurrection and expansion of parks at

Herald and Greeley Square). While we accept that some value recapture and air rights sales will happen, this should be far less aggressive as the overuse of zoning for dollars is causing great harm to our cityscape and should be sparingly used (e.g. Residential supertalls on 57th Street). This development should be done in a way which sensitively and adaptively reuses the existing cityscape rather than razing historic structures to create a new Hudson Yards-like mall, a few blocks east. Whatever plan is ultimately adopted should look to the preservation or adaptive reuse of appropriate pre-war and historic and architecturally significant properties in the area.

E. A New Governance Model

Resolution of the Penn Station needs for improvement should help lead to a new governance model so that the public isn't left to respond to such infrastructure changes piecemeal and without adequate sensitivity to the true footprint of the region. The ULURP process should be utilized before whatever project, including the present, moves forward. Whatever recapture strategies are used should look towards a broader Midtown area and should respect, not essentially eliminate, any zoning restrictions as the GPP and the Master Plan does.

F. The Need for Affordable Housing and Social Services

Affordable Housing, including permanently affordable housing and middle income housing, and high quality homeless services facility staffed by a first class homeless services provider, should be part of the Penn Station plan.

XI. CONCLUSION

There can be no serious question that RethinkNYC's transit infrastructure, governance, and economic strategy proposals anchored by its proposal to rebuild Penn Station and adaptively reuse the Station's midtown neighborhood, represents a tremendous opportunity to unlock the New York region's full potential. With a more integrative approach, New York can correct what mars the region and can soar beyond the COVID tragedy into a less congested, more sustainable, healthier, fairer and safer New York metropolitan region.

Former Governor Cuomo's uninspired rehash of fifties urbanism, which survives largely intact in the GPP and the Master Plan, would freeze-frame some of the worst design elements imaginable at the current Penn Station. If his plan, or some semblance of it, goes forward, New York will have to live with the mistake for most of this and perhaps the next century. The GPP and the Master Plan is a giveaway to myopic real estate interests as well as a massive failure of imagination. It is a monument to mediocrity with supertall skyscrapers that blot out the sun, block views of the Empire State Building, displace small businesses and residents, demolish historic buildings, and suffocate the wonder and romance that are so much a part of New York's sense of itself.

A new Penn Station should also unify regional transit by converting most commuter trains to through-running trains which would travel to new hubs throughout the region. A new Penn Station utilizing this operating model, would allow New York to keep pace with Los Angeles and Philadelphia as well as London, Paris, Hong Kong, Tokyo, and Munich – all of which boast or are implementing through-running, much to their economic advantage.

The destruction of the original Penn Station in 1963 gave rise to New York's Landmarks Preservation Law. Unfortunately, it left us with the architectural running sore of today's Penn Station. We should rebuild a modern version of the original Penn Station, which once stood shoulder to shoulder with New York's Grand Central Terminal, Philadelphia's 30th Street Station, and London's St. Pancras, as symbols of urban excellence.

The Penn Station neighborhood, which in no way meets any fair definition of "blighted," should not be bulldozed indiscriminately to create a redux of Hudson Yards. If the Landmarks Law is to mean anything, there are numerous sites that should be landmarked and others that would otherwise survive the wrecking ball, but for the state's improper use of eminent domain. With the right resolution of the needs at Penn Station these buildings will become assets and not roadkill.

The Penn Station debacle presented by New York State's sidestepping ULURP and other unilateral actions should be the cause of study and reform. The governance model that let this poorly designed behemoth get so far down the tracks (no pun intended) is in need of serious revision.

There is also a need to make a far more pronounced effort in affordable housing and in servicing the homeless in resolving the problems of Penn Station. While lip service has been paid to these needs, real commitments need to be solidified before such a proposal goes forward. The presence of affordable housing and social services should and not be pre-conditioned on the destruction of 31st Street -a pathetic choice that appears to be part of the amended go forward.

New York City, a titan in banking, finance, the arts, and entertainment, must rebuild Penn Station, especially after the disproportionate impact on New York City of the Covid crisis, if it is to continue to play a leadership role in the 21st century. Overcoming the absurd anomaly of a world-class city with its most important transit hub confined to the basement of a hockey rink is one of the most important land-use decisions New York will face for perhaps the next 100 years. The GPP and Master Plan attempt to mercantile us into mediocrity or worse. The monolithic madness of Hudson-Yards-thinking must not be replicated at Penn Station. There are far better alternatives that don't require obliterating our heritage and who we are and can actually move us forward..

And so, as promised, we close where we began:

Why would one of the world's greatest cities, facing intense global competition, settle for a plan as flawed as the GPP and the Master Plan when there exist viable, dynamic and compelling alternatives?

Sam Turvey
Chairperson
RethinkNYC
February 22, 2022



Helicopter view of a relocated Madison Square Garden at Hudson Yards and the original Penn Station restored. The Hotel Pennsylvania remains in place as do view corridors to the Empire State Building. The Hudson Yards site is one of four sites that RethinkNYC included in its August 20, 2020 Submission to New York State. The RethinkNYC plan for the neighborhood was billed then as looking towards a “Miracle on 34th Street” as the plan was to preserve as much of the character of the 34th Street/Macy’s area as possible. A helicopter video tour of three of the sites can be found [here](#).