



CITY OF NEW YORK

MANHATTAN COMMUNITY BOARD No. 4

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J. LEE COMPTON
Chair

June 12, 2006

New York Convention Center Development Corporation
633 Third Avenue
New York, NY 10017

Attention: Laura Cole

Manhattan Community Board No. 4 is pleased to submit the following comments concerning the General Project Plan for the proposed Jacob K. Javits Convention Center Expansion and Renovation Project. These comments were approved at CB4's meeting on June 7, 2006, by a vote of 33 in favor, none opposed, 1 abstaining and none present but not eligible to vote.

This Board is a strong supporter of a world-class convention center for our City, because of its potential to create direct and indirect jobs, and to create economic vitality that will contribute to the City. A properly sited and designed center can also enhance our neighborhood. Our position on this matter is one of long standing. We have all been aware of the problems associated with the Javits Center in its first 25 years and had hoped that its expansion and renovation would be an opportunity to make much needed correction. Sad to say, the present plans suggest that this opportunity is being lost. Instead, the plan has been trimmed to suit financial and political expediency, and there is a significant danger that large public sums will be spent on a facility that doesn't meet what the market demands, is expensive to operate and has inadequate room for future expansion.

The current proposal involves too many compromises to be successful. The new Javits Center will be with us for the next 25 years. It is urgent that we get it right even if it takes a little while longer.

Our principal comments are as follows:

1. Enlivened Eleventh. The best part about the current proposal is the treatment of the 11th Avenue side, and the replacement of the moat with an urban forecourt that is described in the plan as "an open stage to celebrate vertical movement," with all floors and internal circulation visible. We are skeptical that the ground floor concourse, planned as interior publicly accessible open space, will actually be used by anyone other than conventioners, but it still should function well as an attractive bridge between the outside and the inside. It should be landscaped, furnished and programmed to maximize its potential for use. We applaud the architects for understanding the importance of opening the facility up to the City around it – at least the portion of the City to the east – and hope that this aspect of the plan is realized if the Project goes forward.
2. Convention hotel well located. We are pleased that the proposed hotel has been relocated from 42nd Street to a site that will be more convenient for convention visitors, involves reduced public cost and should help start the commercial activity that the Hudson Yards plan depends on.

3. Making Javits too small and too vertical. The plan approved by the State Legislature in 2004 called for 340,000 additional square feet of exhibition space and 265,000 additional square feet of meeting space, mostly in horizontally contiguous space. The current proposal provides the same amount of exhibition space, but stacks it vertically, which is certain to add to operating costs. The proposal adds only 180,000 square feet of meeting space, 32% less than the 2004 plan. No publicly-available market analysis has confirmed that this configuration will enable New York to attract the meetings it is intended to attract. We are being asked to simply rely on the Project's supporters, who assure us it will work. This is not good enough for such a significant public project.

4. Development driven. Depending on who is explaining, the proposal to sell the block between 33rd and 34th Streets is necessary to help finance the Project, or to compensate for the siting of the convention hotel on a site that was expected to contribute to commercial development in the Hudson Yards plan. Whatever the justification, the proposed 13.9 FAR on this waterfront block is far too much. Density should not exceed 10-12 FAR, and commercial development should not be mandatory. More importantly, this block should not be developed as an isolated island. We disagree with finding B.1 in the GPP stating that this block is an impediment to future adjacent development. On the contrary, we think it represents an opportunity for possible future expansion of the convention center and for development of the rail yards to the south. Proper planning requires its development as part of a comprehensive and integrated plan for the entire rail yards, subject to review through the City's uniform land use review procedure (ULURP). If this publicly-owned site is to be developed, a significant amount of the residential development must be affordable to a broad range of New Yorkers, from low- to middle-income.

5. EIS Technicalities. It defies belief that an entire City block that was planned as open space can be filled with 2.45 million square feet of development without any further environmental study. This is now a matter for the courts to decide.

6. Marshalling garage challenges. The proposed 6 story marshalling garage south of 40th Street has the admitted advantage of containing truck activity within the facility, and getting trucks off 12th Avenue and other neighborhood streets. But knowledgeable critics claim that it will make loading and unloading a tortuous process that will add to cost and reduce the number of shows that can be mounted. Placing the marshalling garage at this location precludes any possibility of future expansion to the north.

7. Waterfront isolation. This plan further isolates the community from the Hudson River. The earlier plan for a 39th Street passageway leading to the ferry terminal and the river has been eliminated by the positioning of the marshalling garage. The plan describes pedestrian access to the waterfront and the ferry terminal along 40th Street, but with the marshalling garage on one side and the MTA bus garage on the other, we doubt this block will ever be used by pedestrians. This plan amounts to a *de facto* closing of 40th Street as well.

The plan also isolates the waterfront from the City. As the Hudson River Park comes to life, it is unfortunate and worse that the Project's capable team of architects has not been allowed the resources to apply creative solutions to the building's grim waterfront façade.

8. No room to grow. This plan blocks future expansion. It takes a leap of faith to believe that the marshalling garage can be converted to exhibition space at a future date if and when the Quill garage becomes available. The proposed sale of the 33rd/34th Street block for mixed development eliminates any chance for expansion to the South. The only expansion route left is skyward, a very weak proposal given the penchant for one-floor show space.

9. Vanishing alternatives. Two alternative proposals have been around for a long time. The proposal of the Hell's Kitchen Neighborhood Association, recently endorsed by the Durst Organization, has been on the table for over 3 years and was studied as an alternative in the FEIS. The more radical "flip" proposal of the Newman Institute has been public for over a year. They are creative plans that deserve careful examination. They have much in their favor.

Both alternatives build on some desirable features: the use of the rail yards for mixed development including convention center, office and residential uses; the creation of open space and less blocking of the waterfront; and more efficient and less costly transit to the area to promote development, to name just a few.

The Community Advisory Committee, which was formed in January 2006 through this Board, requested that a comparison of these alternatives be prepared and made available to the boards of the NYCCDC and the NYCCOC prior to approval of the GPP. The study is complete, but this reasonable request was ignored, and the comparison has not been released. The comparison must be publicly released and considered by the NYCCDC board before final approval of the GPP, so that everyone can consider what is best for the west side and for the City.

Javits is important for the City, and it is a major component of our west side community. This flawed, shortsighted plan serves no one well, and will not be a political legacy to be proud of.

Sincerely,



J. Lee Compton
Chair
Manhattan Community Board No. 4



Anna Hayes Levin
Co-Chair
Clinton/Hell's Kitchen Land Use Committee



Simone Sindin
Co-Chair
Clinton/Hell's Kitchen Land Use Committee

cc: Local elected officials
Michael Petralia, President, NYCCDC
Dan Kaplan, FxFowle