

# The Hudson Yards Community Advisory Committee

c/o Manhattan Community Board No. 4  
330 West 42<sup>nd</sup> Street, 26<sup>th</sup> Floor  
New York, NY 10036

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February 8, 2007

Ann Weisbrod, President  
Regina Myer, Senior Vice President, Planning & Design  
Hudson Yards Development Corporation  
225 West 34th Street #1402  
New York, New York 10122

Dear Ann and Regina:

Many thanks to you and your colleagues for your detailed and substantive presentation to us on January 25, 2007. We were very pleased with many aspects of the presentation, including particularly the information concerning the structural challenges of building over an active rail yard. We are also pleased that you are being guided by many of our Principles for Development, which we consider important in planning for the area, and that we were able to engage in a cordial yet substantive conversation about this very complicated undertaking.

Here are our preliminary reactions, organized to follow your presentation:

## **“MUTUALLY SHARED GOALS” – presentation p. 37**

**1. ERY/WRY Coordination.** It is our recommendation that a comprehensive site plan be developed for the Eastern and Western Rail Yards as an integrated whole. While you provided us with preliminary site planning options for the Western Rail Yard, the plan for the Eastern Rail Yard was presented only in a conceptual state and was assumed to be permanently fixed by the 2005 rezoning. We would like to see the detailed site plans for the Eastern Rail Yards together with the plans for the Western Rail Yards. It may be appropriate to consider changes in the zoning for the ERY in order to develop the best plan for the Rail Yards as a whole. This comprehensive plan should also be integrated with plans for 29<sup>th</sup> to 30<sup>th</sup> Streets west of Eleventh Avenue (Block 675) and 33<sup>rd</sup> to 34<sup>th</sup> Streets west of Eleventh Avenue (the current Javits Center marshaling yards). We look forward to discussing this with you further.

**2. Open Space.** We are very pleased with the amount of open space shown in the conceptual plans for the WRY, and with the location of so much of it on the waterfront. We prefer Conceptual Alternatives B and C because they open to the waterfront and also connect more broadly to Eleventh Avenue. In Conceptual Alternative A the open space is too constrained to the east, and looks like it will be more of a boulevard than usable public open space. However, the scale here is very hard for us to understand. At the next presentation, we would like to see comparisons with other existing parks and open space, so we can put these plans in context.

The open space must be designed as a public park at a city scale. All open space should be as large and contiguous as possible. It should be designed to encourage use not only by those who will live and work in Rail Yards buildings, but more broadly by residents of the neighborhoods to the east and south, which have no open space to speak of. It should draw visitors up along the High Line, from Hudson River Park, and from the commercial corridor to the east. It should therefore not include any structured active space such as ballfields or soccer fields, though it should allow for informal active recreation such as children running around, kite flying, Frisbee throwing and the like. It should include a children's playground.

**3. High Line.** The High Line is a critical link in the open space network connecting Hudson River Park and the Neighborhoods of the West Side. It is also an invaluable historic resource. The lesson of Penn Station is only two blocks away and must not be repeated. The High Line will provide the new neighborhood with character and identity that will anchor it to its specific time and place in history. In addition to these civic benefits, based on recent experience in West Chelsea, the High Line has proven to add real value to development sites to offset the additional cost and effort of building around it.

The RFP must therefore specifically require preservation of the High Line historic structure and easement, in its current location, on the Eastern and Western Rail Yards. The High Line structure must be considered an integrated portion of the overall site plan.

Buildings should not be allowed to interrupt the view corridor on the High Line looking west along 30<sup>th</sup> Street to the river. The widened east-west view corridor established by the High Line will strengthen the connection to the waterfront and should not be violated.

The High Line landscape should be consistent with the High Line park south of 30<sup>th</sup> Street, so that the entire High Line is experienced as a consistent park environment.

**4. Bridge to Hudson River Park.** This bridge should be dimensionally inspired by the High Line – broad enough to not quite feel like a bridge, but not an overpowering structure. It should remain open to the sky, and function as an extension of Hudson River Park and the open space rather than a passageway between the two.

**5. Parking.** You have misunderstood our position on parking. The Comprehensive Off-Street Parking Regulations for the Midtown Manhattan core referred to in our Principles for Development reflect a policy of restricting parking in order to “facilitate a mass transit, pedestrian-oriented Central Business District.” ZR 13-00. We support this policy. With the Mayor and the Governor now both working on getting people out of their cars and onto mass transit, this policy should be reinforced by limiting parking on the West Rail Yards to the optional accessory parking allowed by ZR 13-12 and 13-133. Furthermore, we continue to believe that the 950-space public parking garage planned beneath the proposed mid-block boulevard is a mistake. That garage, if it is to exist, should be relocated to the Rail Yards.

**6. Green Buildings Standards.** We are pleased that you share this goal. All development, including the open space, should meet or exceed the U.S. Green Building Council's “Leadership

in Energy and Environmental Design” (LEED) silver standards. We note that this is the standard that the City has adopted for City-owned or City-funded capital projects, per Local Law 86 of 2005.

**7. ULURP.** We are especially pleased that development plans will be subject to full public review through the City’s uniform land use review procedure.

**8. Street Grid/Access Road.** You are generally on the right track with the idea of the WRY access road, and we look forward to working with you as you consider further refinements. The access road should be no wider than a narrow City street, should not count as open space, and, like a City street, should have no development rights. It should avoid isolating open space and its connection to the grid must be carefully planned. Conceptual Alternatives B and C both leave open space stranded in the middle of the access loop and produce intersections at Eleventh Avenue that don’t exist anywhere else in Manhattan. This is to be avoided, since the plans should seek to maximize open space and to integrate the West Rail Yards into the rest of the City as much as possible. We ask that you consider other options, such as a two-way street with a turn-around at the western end. The street should be known as 32<sup>nd</sup> Street, to support its connection to the grid. We also ask you to consider locating residential entrances on 30<sup>th</sup> and 33<sup>rd</sup> Streets and on Eleventh Avenue, thus enlivening those streets, and restricting use of the access road to emergency vehicles.

**9. Flexible guidelines.** We appreciate your commitment to flexible guidelines. To clarify, our interest in flexible design guidelines applies only to the architecture of the new construction, which should reflect multiple visions and a diversity of architectural styles and forms. We continue to believe that the best way to achieve flexibility in the development process is to retain public oversight over the development plan so that construction advances in phases and can be adapted to changing financial and political conditions as well as public needs over time.

**“ONGOING DISCUSSION REQUIRED” – presentation p. 39**

**10. Affordable Housing.** We appreciate your recognition that this important subject requires further discussion. 80/20 development is not an adequate solution for this vast public site. We reiterate our fundamental principle that residential floor area equal to or at least 30% of the housing and a percentage to be determined of the commercial floor area must be housing that is permanently affordable to low-, moderate- and middle-income residents. A portion of this housing should also be targeted at very low-income New Yorkers with special needs. The affordable component of the residential development should be on-site and integrated with market-rate housing. To achieve this, the RFP must identify specific sites with specific requirements for affordable housing, together with a commitment for City financing to support the required development.

The City’s agreement with the MTA contemplates that the Guidelines “will be based on sound planning principles.” In recent rezonings, particularly the Hudson Yards rezoning, sound planning principles have included support for affordable housing that goes well beyond the 80/20 mechanisms.

**11. Public facilities.** We reiterate our insistence that the development plan must include specific sites for public facilities necessary to support the new residential community throughout Hudson Yards. As we have learned with the Hudson Yards rezoning, without specific siting now, the necessary sites will simply not be available when they are needed.

**12. Space for arts and non-profit uses.** Allocating so much space for one large cultural facility on the Eastern Rail Yards is a mistake. Rather than counting on a single, as yet unspecified and undoubtedly big-ticket, cultural destination to bring cultural vitality to the area, the plan should distribute a variety of smaller cultural uses throughout the district, including space for small, non-profit theatrical and arts companies. The plan should seek to create a cultural *district* rather than a single cultural destination. The Eastern Rail Yards site now planned for a cultural facility is one of the few areas of the Rail Yards on terra firma; this site would be better used to absorb some of the additional residential density you are planning for the Western Rail Yards thereby reinforcing 30<sup>th</sup> Street as a residential corridor.

## **OTHER SUBJECTS FOR ONGOING DISCUSSION**

**13. Labor provisions.** We are disappointed that your presentation made no mention of labor provisions. The RFP should include prevailing wage, standard benefit and apprenticeship training program requirements, and should maximize opportunities for minority- and women-owned businesses.

**14. Scale of Development.** The conceptual plans you showed us did not reveal the density on which they are based. The Rail Yards are an appropriate location for high-density development, but only if they absorb some of the density now planned for the East Side of Eleventh Avenue north of 34<sup>th</sup> Street. The ERY should carry more density than the WRY, and development should step down to the waterfront. Buildings on the WRY should be planned to minimize shadows on the open space and to provide openness to and multiple views of the waterfront. To achieve this, building forms should be tall and slender, with the tallest buildings located furthest from the waterfront.

We are also extremely concerned about the cumulative environmental impacts of the Hudson Yards rezoning coupled with significant additional density on the WRY as well as on Block 675 and the Javits Center marshaling yards, the last two of which were planned as open space in the Hudson Yards plan.

**15. Pier 76.** Our community is keenly interested in the future of Pier 76. However, Pier 76 is not part of the planning process covered by the City's agreement with the MTA, and your presentation did not include any information about Pier 76. Pier 76 therefore has nothing to do with the present discussion, so we make no comment.<sup>1</sup>

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<sup>1</sup> We do look forward to a full discussion of Pier 76 in the future, with participation by the other stakeholders that will have to be involved including the Hudson River Park Trust, the Economic Development Corporation, the New York Convention Center Development Corporation and community groups such as the Friends of Hudson River Park and the Coalition to Protect Our Parks (CPOP).

## PROCESS AND IMPLEMENTATION

We are deeply concerned that your planning efforts are constrained by an artificially imposed timetable that does not afford you or us or any of the other stakeholders adequate time to develop a plan that will lay the necessary foundation for long-term successful development of the Rail Yards.

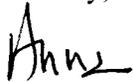
The public sector should first establish a **detailed site plan**. That important work must determine the basic shape of development of this enormous public asset. Both we and, we believe, the private development community, expect that the planning process will result in Guidelines that are specific enough so that when the RFP is issued we can all know where the buildings will go and how big they will be. Developers responding to the RFP must know, with a fair degree of certainty, what they will be allowed and required to build. This requires that all stakeholders work together up front, to address and resolve the host of difficult planning choices and tradeoffs involved. With detailed, thorough and broadly consultative planning now, we should seek to reach consensus around a development plan before the RFP is issued. If that consensus can be reached, the ULURP process will involve much less risk and delay for all concerned.

We therefore believe that **additional meetings with the HYCAC** will be required before the Guidelines should be released, and we understand that you share this view. We are ready to meet again at your earliest convenience.

In addition, there must be an opportunity for **public presentation of the plans and solicitation of input before the Guidelines are final**. You have previously indicated that such a public forum is in your plans; let us know if we can help with the organizing.

We hope you find these comments useful, and look forward to continuing to work with you as your planning effort proceeds.

Sincerely,



Anna Hayes Levin  
Chair

Cc: Bill Wheeler, MTA  
HYCAC members