

# 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

---

January 8, 2009

Jay Cross  
President, RG ERY LLC  
c/o Related Companies, L.P.  
60 Columbus Circle  
New York, NY 10023

Elliot G. Sander  
Executive Director and Chief Executive Officer  
Metropolitan Transportation Authority  
347 Madison Avenue  
New York, New York 10017

## **Re: Eastern Rail Yard Development Plan**

Dear Messrs Cross and Sander:

The Hudson Yards Community Advisory Committee (HYCAC) writes to offer its comments on the development plan for the Eastern Rail Yard (ERY), as presented by Related at our public forum on December 1, 2008 and in the pending application to the Department of City Planning for zoning text changes.

With Manhattan Community Board 4, HYCAC has been consistently engaged in the development process for the entire West Side Yard, from the beginning of the current effort in July 2006. We have held five public forums and many smaller meetings to solicit the community's participation, and we have provided written comments to the MTA, the Hudson Yards Development Corporation, the development community and, most recently the Department of City Planning on the draft scope of work for the Western Rail Yard Environmental Impact Statement.

We are grateful to the Related team for its participation in the two recent forums concerning the West Side Yards (WRY), on September 15, 2008 concerning the Western Rail Yard and December 1, 2008 concerning the ERY, for their willingness to engage in substantive discussions with our community, and for the careful attention they have given to many of our concerns.

---

*The Hudson Yards Community Advisory Committee was formed pursuant to the agreement between the Administration and the City Council with respect to the Hudson Yards rezoning in January 2005 to advise the Hudson Yards Development Corporation regarding the financing, planning, design and construction of the Hudson Yards redevelopment area from a neighborhood perspective. Its members include representatives of Manhattan Community Board 4, the area's local elected officials and several local organizations. For more information, see <http://www.manhattancb4.org/HKHY/docs/HYCACstructure.htm>.*

This letter provides some general comments on the ERY development plan. In a separate letter to the Department of City Planning (copy attached), CB4 is providing comments on the proposed zoning text changes. We endorse those comments.

### The Site Plan

In general, the site plan is significantly improved from the proposal submitted by Related in response to the RFP.

Connections. We are pleased that the street grid is being reintroduced to such an extent, consistent with the recommendations in our January 8, 2008 letter to the MTA. The streets must be planned and operated as real city streets, with full public access, parking regulations, sidewalks and street-level retail uses.

Access from Tenth Avenue, through the retail center, must be integrated, as much as possible, with the street grid, and function as pedestrian extensions of 31<sup>st</sup> and 32<sup>nd</sup> Streets. Pedestrians must be able to see through the space, from Tenth Avenue to the open space on the ERY, and vice versa. Signage must invite the public in and through, and include wayfinding to the WRY and Hudson River Park beyond.

Street-level on 30<sup>th</sup> Street. Because the only solid ground in the ERY development site is along 30<sup>th</sup> Street, you have concluded that all parking spaces and loading facilities for the entire site must be accessed only from 30<sup>th</sup> Street. We urge reconsideration; though we recognize the engineering challenges of the site, loading and delivery activities would be better accommodated if they could be distributed throughout the site. In any event, care must be taken to ensure that 30<sup>th</sup> Street becomes a grand boulevard to the river and not the “back-of-house” loading dock portion of the site. This is especially important since the plans for the WRY and the northern portion of the Special West Chelsea District envision the transformation of 30<sup>th</sup> Street into a residential promenade between Tenth Avenue and the Hudson River. Curb cuts must be reduced in number and shared. Loading docks must be inside the facility, as at Time Warner Center.

The space under the High Line must be creatively planned to provide small, active storefronts for neighborhood uses, including local market, retail and gallery space, and perhaps space for small not-for-profit organizations.

Replace the Cultural Center with a Community Facility. The comments in our January 8, 2008 letter remain apt: we support the desire to enliven the rail yards with cultural activity, but believe that can best be accomplished by providing substantial but smaller spaces throughout the development for small cultural uses, especially performance, rehearsal and administrative space for theatrical and arts companies.

A school is a bigger priority for us than an undetermined cultural facility. The school planned for the WRY will not be adequate to meet the existing and forecast demand for additional school seats. The space designated for community facility use on the ERY should include an additional school. The school must be locally zoned, but could have a curriculum related to other cultural uses in the building. It would make a great new location for the

Professional and Performing Arts School now located in overcrowded shared space in PS 17 on West 47<sup>th</sup> Street between Eighth and Ninth Avenues.

### Plans must include affordable housing

We are pleased that Related's plans include the maximum amount of residential development allowed by the zoning. But there is no concrete plan to make any of the new housing affordable.

We have consistently advocated that 30% of the residential development on this public site must be allocated to permanent affordable housing for low-, moderate- and middle-income families. Of 1900 new dwelling units on the ERY per the EAS, 570 units must be permanent affordable housing.

### Commit Now: Preserve the High Line, Save the Spur

More than 165 people came to the public forum on December 1, 2008, most of them to demand – as we have long insisted - that the High Line must be preserved in its entirety, including the Spur over Tenth Avenue at 30<sup>th</sup> Street. Related's plans have consistently included preservation of the High Line, but the future of the Spur is less clear. The arguments in favor of the Spur have been forcefully articulated by Friends of the High Line and others:

- **The High Line, including the Tenth Avenue Spur, is an irreplaceable historic structure.** We should not allow pieces of the High Line to be chopped off.
- **The High Line is the one and only piece of historic architecture at the rail yards site.** The High Line is what will stitch this entirely new development back into the fabric of the city and the surrounding neighborhood;
- **The High Line creates value.** If we had listened to the real estate community five years ago, the High Line would never have happened. The reality is that the High Line has created more value for the real estate community in Chelsea than we ever could have imagined. It will do the same at the rail yards.
- **The High Line is all about making connections, and the Tenth Avenue Spur is a connector.** Like the other spurs to the south, between 15<sup>th</sup> and 17<sup>th</sup> Streets, the Tenth Avenue Spur was built to reach out to surrounding buildings and to extend those connections. In this case, this spur was built to carry mail to the Morgan Post Office Annex. So the Tenth Avenue Spur is an extremely clear example of this connective aspect of the High Line and, therefore, is an integral part of the High Line's history.
- **The Spur will be one of New York's iconic "destination" spaces,** like the steps of the Met or the clock at Grand Central Terminal. People will say, "Meet me at the Spur."
- **The Tenth Avenue Spur would be one of the most exciting public spaces at the rail yards.** The Spur makes a strong visual connection to the other location where the High Line crosses Tenth Avenue – the Tenth Avenue Square at 17<sup>th</sup> Street – one of the most exciting spaces in Section 1 of the High Line.
- **The Spur is what announces the High Line at Tenth Avenue.** At 30<sup>th</sup> Street, the High Line is over 100' away from Tenth Avenue and moving to the west. Without the spur, the High Line will be largely invisible from Tenth Avenue.

- **The Spur extends pedestrian connections into the surrounding neighborhood.** This is both good design and a safety issue. With the traffic on Tenth Avenue and the entrance to the Lincoln Tunnel, the intersection of Tenth Avenue and 30<sup>th</sup> Street is currently difficult, even dangerous, to navigate as a pedestrian. With a High Line access point on the east side of Tenth Avenue, the Spur would provide safe and uninterrupted pedestrian circulation, above the traffic, across Tenth Avenue.
- **The Spur is unique.** The Tenth Avenue Spur is the biggest single area on the entire length of the High Line and, as such, presents design opportunities that are not possible anywhere else along it.
- **Remember Penn Station:** 50 years from now, history will not look kindly on us if the High Line is not preserved. Let us not repeat past mistakes.

The uncertainty about preservation of the High Line must end. MTA and Related must join the City in making a definitive commitment to full preservation of the High Line. The High Line must be owned and operated by the City, and designed and programmed as a public park and a comprehensive whole from its beginning at Gansevoort Street to its end at the Javits truck marshalling yard at 34<sup>th</sup> Street. Design of the portion of the park on the West Side Yard must be coordinated with Related and MTA as plans progress.

Regular HYCAC Meetings Should Continue

We are grateful for the constructive engagement that has taken place so far between Related, HYCAC and the broader CD4 community. It has resulted in a better plan, and in a better understanding by all of the stakeholders of the complex issues involved in successful development of the West Side Yard. Regular meetings between Related and the HYCAC should continue to be scheduled as the planning and development process moves forward.

Thank you in advance for your consideration of these comments.

Sincerely,



Anna Hayes Levin, Chair

Cc: Related – Vishaan Chakrabarti, Michael Samuelian, Joanna Rose  
 Melanie Meyers, Fried Frank  
 MTA – Elliott G. Sander, William Wheeler, Rocco Krsulic, Hilary Ring, Jim Henley,  
 Jeremy Soffin  
 DCP David Karnovsky, Edith Hsu-Chen, Frank Ruchala  
 HYDC – Ann Weisbrod, Wendy Leventer, Aaron Kirsch  
 HYCAC Members