

AIA New York Chapter

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The American Institute of Architects



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The AIA New York Chapter, the founding Chapter of the American Institute of Architects, representing 3,500 architects, professional affiliates, and public members, has reviewed and supports the proposed zoning text and the plans for development of Hudson Yards. The area west of Eighth Avenue in the 30's represents perhaps the most underutilized area in Manhattan and offers opportunities for the entire region, City, and adjacent communities.

We would like to commend the Department of City Planning for looking beyond zoning to integrate mass transportation, open space and public investment into one plan. It must be pointed out that this total plan is not being reviewed in its entirety-- before you today are the proposed zoning changes, but other land use and development issues will not be reviewed by the Commission. However, for us to comment on the zoning text we need to review these other parts of the plan.

The current plan along with the associated zoning text needs to integrate the following positive goals:

- Expansion of midtown Manhattan, the city's premier commercial center.
- Expansion of the Convention Center.
- Connections to mass transportation systems including an extended number 7 line, regional rail and ferry service.
- Creation of open space and connections to the Hudson River Park, with provisions for parking-- particularly the introduction of the European model of building parking under urban open space.
- Creation of a "24/7" community with significant residential development.
- Plans for a multi-purpose facility that will double as convention space and stadium (previously supported by the AIA).

However, given these overall positive aspects of the plan, there remain specific areas where we feel work needs to be done, in terms of both planning and the zoning response:

- **Expansion of the Javits Center** is much needed, but as currently envisioned creates a nine-block wall between the city and the river, even further restricting access to Hudson River Park and the Ferry Terminal. Development of a strong east west connection through the Center, perhaps at 38th Street, would help mitigate this, but more creative measures are needed. This is a sufficiently serious issue that we recommend initiating a joint city-state-civic effort to explore alternate expansion configurations, such as stacking the building, building over the highway, or mixed use convention/ community park and access structures to the north. This effort should also explore animating the blank wall along Eleventh Avenue with commercial and/or cultural activities.
- **Residential Development:** The revised text loosens some of the restrictions on residential development. We would encourage even more flexibility on this issue, although we agree it makes sense to reserve certain sites for commercial office development. CHPC has proposed a 7 year sunset of any such use restriction, making sure that if it prevents development it is reviewed by the Commission. We support this proposal. Provisions should be made to ensure that the residential development encourages a mixed income community.

- **Required Retail:** Location of required retail development in the plan also has been somewhat modified in the revised text, in that one-sided retail on the side streets has been reduced to 50%. We feel that this requirement should be made optional, and more emphasis should be placed on mandatory retail on both sides of east west through cross streets such as 34th Street and whatever street will connect through the Convention Center to the ferry terminal. Additionally, there is no retail requirement for Eleventh Avenue, which should be developed with retail on both sides, including the west convention side, by filling in the existing “moat” of the Convention Center. Required retail on the Hudson Boulevard may be less successful, as this street dead-ends at both ends, at 33rd Street and at 38th Street.
- **Massing Controls:** Each of the sub-districts has a finely grained set of bulk regulations with some design flexibility. Adding or substituting performance-based regulations such as those used in the Midtown Special District would allow for more creativity and variety in the streetscape and should be considered by the Commission. We would like to note that in reviewing City Planning’s studies for partial block development, the zoning now provides a more varied build out, better fitting with typical New York conditions.
- **Ninth Avenue and Organic Growth:** Ninth Avenue has been essentially preserved in its current density and bulk. We understand the concerns of the neighborhood and community; however, the density of the zoning in this area may need to be reconsidered as larger scale development occurs on all sides.

We would like to reiterate our overall support for this plan and its ambitious vision for the future of New York City. While we recommend refinements to the plan and by implication to the zoning needed to implement such refinements, such requested improvements will only strengthen what is an admirable piece of work. TheAIA New York Chapter offers its help in further developing these exciting plans for an underutilized area of Manhattan, in order to create benefits and opportunities that will be enjoyed by the borough, city and region as a whole.