

July 18, 2023

AIA New York Statement on CPC's Recommendation on MSG's Special Operating Permit and Penn Station Redevelopment

For too long commuters and visitors have suffered from the inadequate accessibility, efficiency, and connectivity at Penn Station. Right now, there is a unique opportunity to shape the future of Penn Station, create transformative change to improve the customer experience of both Penn Station and Madison Square Garden (MSG), and design a space that meets the current demands of the largest transit hub in North America. Since MSG was first granted a special operating permit 60 years ago, the needs of Penn Station have evolved. These needs, in conjunction with the incompatibilities of the shared space between the railroads and the arena, have created a heightened burden on the public experience.

The City is currently considering two actions related to the application by the owners of MSG for a renewal of its Special Operating Permit:

- NYCDCP's proposed text amendment to Zoning Resolution ZR 74-41, which introduces additional findings criteria to be used in evaluating an application for MSG's Special Permit;
- MSG's application for a Special Operating Permit in perpetuity for Madison Square Garden Arena. The arena's current ten-year Special Permit expires on July 24, 2023.

Recognizing the extraordinary significance of MSG's location directly above Penn Station and the millions of riders who use the station, we believe that the following key principles must be considered in helping to inform the decision-making process for these actions.

Civic importance of the public realm surrounding Penn Station and MSG

Penn Station is the busiest public transportation hub in the nation, with more than 600,000 daily commuters and visitors served by the region's rail networks. Yet the current street entrances are difficult to find, often congested, and lack the civic presence appropriate for public gateways to the station. The NYC Department City Planning's (DCP) text amendment to ZR 74-41 would for the first time acknowledge the civic importance and impacts of an arena of the scale of MSG on the local neighborhood, users of Penn Station as well as MSG, and the broader public. The new criteria elevate the primacy of the public realm by providing a strong basis for ensuring high-quality outdoor public space surrounding MSG and Penn Station, improved pedestrian access and circulation to the facilities, more specific criteria for MSG's truck-loading/unloading operations, and a much-needed requirement for consistency and compatibility with existing and proposed transit facilities at Penn Station.

Need for a transformation of Penn Station

Despite its fundamental importance as a linchpin to the city and regional economy, Penn Station has not benefited from a complete reconstruction since the destruction of the original superstructure in 1963. Significant expansions of service to Penn Station are being planned by the MTA, Amtrak, and NJ Transit; the station's users deserve a better facility. The railroads who own and operate out of Penn Station developed the Penn Master

Plan, outlining goals and objectives necessary to upgrade the station to modern standards for a regional transportation hub. These improvements were further developed in the MTA's proposed Penn Reconstruction Project and will be refined in the next design and review phases. The design addresses critical life safety deficiencies within the station; rationalizes station operations; improves station circulation at the street, concourse, and platform levels; provides ADA accessibility through the station complex; and enhances user experience through a consolidated concourse featuring high ceilings, extensive daylighting, and more visible and generous station entrances oriented to passenger destinations.

Interrelationship of Madison Square Garden and Penn Station

By recognizing the complex, interconnected nature of MSG and Penn Station's physical properties and operations, the city has the opportunity to implement appropriate mechanisms to ensure that the highest quality design for a truly transformative Penn Station can be achieved. Under the new DCP text amendment, MSG is required to be "consistent and compatible" with Penn Station, and the transfer of property rights to the mid-block taxiway, MSG staging area, and Eighth Avenue entrances are critical to achieving the vision for the project. AIANY supports an appropriate limited-term extension of MSG's Special Permit tied to DCP's criteria that prioritize the creation of vibrant public spaces in and around Penn Station and MSG, as well as the realization of a modernized Penn Station with the civic presence and scale envisioned by the MTA and the region's railroads. New Yorkers have suffered long enough with an inadequate and disjointed station, and now is the time to return the major transportation hub to a design that New Yorkers deserve.