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MAS Comments to New York City Council on 270 Park Avenue Text Amendment, CEQR No. 19DCP085M, ULURP Nos, N190180 and N190180(A) ZRM

Before City Council today is the first zoning text amendment under the Greater East Midtown rezoning. We would be remiss if we did not take note that this proposal seeks to demolish the Union Carbide Building, a treasured piece of New York's Modernist history.

Indeed, MAS has been advocating for the preservation of this building for years. As we wrote in our 2013 report, *A Bold Vision for the Future in East Midtown*: "Built for the Union Carbide company, 270 Park Avenue is one of the great buildings of that era. At the time of completion, the Union Carbide Building was the tallest stainless-steel-clad building in the world and Park Avenue's tallest skyscraper, as well as Manhattan's tallest building constructed since 1933."

Now it will be the tallest building ever intentionally torn down. At the very least, its replacement should be an improvement to the public realm.

East Midtown desperately needs open space. In fact, one of the key recommendations from the Greater East Midtown Steering Committee was the requirement for buildings larger than 30,000 square feet to include a POPS. As a result, 16 new POPS could potentially be built in this neighborhood. Therefore, we have great interest in ensuring that this first new POPS in the East Midtown Subdistrict is truly effective and inviting, setting a precedent for those to come in the future.

While we commend JPMC for being responsive to comments from Community Board 5 and the Manhattan Borough President's Office, we have great concern about the proposed location of the 10,000 square-foot unenclosed POPS. Madison Avenue is a congested narrow street. It includes five major bus routes, with stops on the eastern side of the street. Sidewalks are also relatively narrow and pedestrian traffic is heavy. Moreover, the east side of Madison Avenue is typically shrouded in shadow for large portions of the day throughout the year.

Meanwhile, the Park Avenue side of the proposed building is a more inviting location. The Park Avenue side has sufficient sidewalk space (15 feet to the street and 63 feet of building frontage) to accommodate an infinitely more appealing open space. The east and west sides of Park Avenue in the vicinity of the proposed building are popular locations for workers and visitors to eat lunch, rest, and socialize in a sunny location. Traffic would be farther away from POPS visitors than the Madison Avenue side. As such, we find Park Avenue to be a significantly more conducive location for an enjoyable public space.

Given the prominence the new JPMC headquarters will have, the POPS presents an opportunity to create a quality open space that will be an asset to the East Midtown public realm. For the reasons stated herein, we find the location on Park Avenue would be better suited to achieving these goals. Public spaces in East Midtown are few and far between. The area can ill afford a new public space that is in a vastly inferior location.