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Nuha Ansari
EXECUTIVE DIRECTOR

June 26, 2024

Ms. Stephanie Shellooe, AICP, Director
Environmental Assessment and Review Division
New York City Department of City Planning
120 Broadway, 31st Floor
New York, New York 10271

Re: MSK Pavilion, CEQR No. 23DCP118M - Written Comments on Draft Scope of Work

Dear Ms. Shellooe,

FRIENDS of the Upper East Side Historic Districts submits these written comments as an expansion of our public testimony at the June 26 public hearing. For 40+ years FRIENDS has worked to preserve architectural history, livability, and sense of place on the Upper East Side. We are a leading voice for common sense planning and land use, having led successful community efforts for contextual zoning and expanded historic district protections. We support balanced urban change on the Upper East Side.

FRIENDS supports MSK's mission and desire to modernize its physical plant to align with industry standards and even to expand its facilities in the worthy cause of fighting cancer. We understand that MSK facilities have grown in a piecemeal fashion since Memorial Hospital first opened on York Avenue in 1939, and that there is a need to consolidate and update services and to keep up with increasing demand. Rather, FRIENDS' concerns about this project are to do with the proposed pavilion's height and bulk and its impact on neighborhood character and livability, and we posit that MSK could achieve its goals with a more contextual building that remains in conversation with its neighbors.

The proposal projects an expansion of service – 28 operating rooms and 206 patient beds with a staggering 903,000-square-foot floor area. Is there really justification for this massive expansion of floor area especially as cancer care is reported as moving towards outpatient facilities and the use of medication? Seen through an equity lens, MSK could bring their world renowned cancer care to underserved New Yorkers by instead building satellite medical facilities in places lacking such services, for instance Staten Island which has some of the highest cancer rates in the city.

Another concern is the allocation of space within the new building. The proposal allocates 56% of the building's vertical space to mechanical space. This means that only 44% of the space will be used for patient care, surgery, clinical areas, and the lobby. Is there really justification to build a tall surgical hospital? This is a poor use of space and that a less vertically-oriented building design should be considered.

FRIENDS

of the UPPER EAST SIDE
HISTORIC DISTRICTS

The proposed 598-foot-tall pavilion with only 30 stories would be a massive tower rising directly from the sidewalk, with no setbacks, a throwback to pre-zoning regulation building form soaring above even the tall medical towers further north along York Avenue. From a zoning and land use perspective, the massive upzoning and amendments required before such could be approved would send a troubling signal to developers about what is permissible in the Upper East Side, and with respect to institutional expansion across the city.

We are also concerned about the broad-ranging environmental ramifications, from impacts on transportation, traffic, neighborhood character, and the disruptions of a projected six-year construction. A tower the size of the proposed pavilion would destroy the carefully calibrated balance in the surrounding area created by the six story tenements across the street, a historic church, a school, and community spaces including St. Catherine's Park, the only major open space in the area. All of these were built with a direct emphasis on prioritizing human-scale development and community-oriented planning, which would be upended by the introduction of a massively outsized tower.

At almost 600 feet, the MSK Pavilion is set to be the tallest hospital building in New York City, well over 100 feet taller than the second-tallest medical tower, MSK's David A. Koch Center at East 74th Street. It also includes a proposal for a several-story-tall sky bridge, which would deal a further blow to neighborhood character, casting shadows on the sidewalks below and negatively impacting the pedestrian experience.

We urge the Department of City Planning to carefully consider the potential negative impacts of this current proposal on the livability and life quality of the neighboring community and to urge MSK to revise its plans to ensure a project with a significant height reduction and with an appropriate setback on the 1st Avenue side, that integrates harmoniously with our existing community.

Sincerely,



Nuha Ansari
Executive Director