

September 27, 2012

**STATEMENT OF THE NEW YORK LANDMARKS CONSERVANCY AT THE PUBLIC SCOPING MEETING REGARDING THE PROPOSED DRAFT SCOPE OF WORK FOR THE PREPARATION OF A SUPPLEMENTAL ENVIRONMENTAL IMPACT STATEMENT FOR REZONING MIDTOWN EAST**

Good day Chair Burden. I am Andrea Goldwyn, speaking on behalf of the New York Landmarks Conservancy. The Landmarks Conservancy is a private, independent, not-for-profit organization, founded in 1973. Our mission is to preserve and protect historic resources throughout New York.

The Conservancy has substantial concerns about the proposed Midtown East rezoning. We agree that New York needs to change and grow, and that new development can stimulate the economy and sometimes results in fantastic architecture. This proposal, however, almost entirely ignores the fine historic buildings that already grace Midtown East, and give this part of the City its character.

While the draft scoping documents exclude City-designated landmarks as potential development sites, they lack a comprehensive review of historic resources in Midtown East. Besides those City-designated landmarks, there are 21 buildings that the State Historic Preservation Office has determined are eligible for listing on the State and National Registers of Historic Places. We have recently completed a survey and found 17 additional historic structures, designed by significant architects such as Warren & Wetmore, York & Sawyer, and James Rogers Gamble, that we plan to submit for such eligibility. Of this total group, 16 have been identified as projected or potential development sites (images attached). These are fine, old buildings that date to the early 20<sup>th</sup> century, with soaring masonry facades enlivened by decorative details. They are an essential part of the mix that makes New York such a special place. London didn't tear down its historic architecture to build the Shard, and neither should New York.

We also question whether the proposed changes to the Grand Central Subdistrict will be of any help to this landmark. The owners of Grand Central's air rights are rightly concerned that those rights will now be set aside in favor of those that the City is selling. And we have heard from major religious institutions wondering that if the City can create special districts where none existed, why can't it do the same for those landmark buildings that so enrich New York?

Our concern about the historic buildings is only one of many that this plan raises. It reduces the City's commitment to sustainability by encouraging the demolition of perfectly intact buildings with all their embodied energy. It lacks specifics about how the transportation improvement funds will be used. And it is not clear that authority exists for the "sunrise" provision.

In many cases, the City Planning Department has used rezoning judiciously, responding to community concerns and codifying existing building patterns. That thoughtful application has improved neighborhoods. If fully implemented, the plan presented today would irreparably damage one of New York's great historic commercial zones. The blend of new and old is what keeps New York vital and unique. That principle should be a starting point for revitalizing this significant area, not an afterthought as it is presented here.

Thank you for the opportunity to express The Landmarks Conservancy's views.