

May 13, 2013

STATEMENT OF THE NEW YORK LANDMARKS CONSERVANCY AT THE MULTI-BOARD MIDTOWN EAST TASK FORCE MEETING REGARDING THE DRAFT ENVIRONMENTAL IMPACT STATEMENT FOR REZONING MIDTOWN EAST

Good evening. I am Alex Herrera, 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. However according to the DEIS, this proposal could entail the demolition of many fine historic buildings that grace Midtown East and give it its special character. We appreciate the examination of eligible historic resources in the Draft Environmental Impact Statement. In fact, the 181 pages of the historic resources section show that this is an area with a rich architectural heritage and many landmark-quality buildings that are not designated. So we are more concerned than ever that the plan still calls for the loss of up to 17 significant buildings on projected development sites. These are distinguished early 20th century works of architecture with soaring, beautifully detailed masonry facades.

The LPC released its own survey, which includes six buildings on our list. We support designation of those six and ask the LPC to calendar them immediately. London didn't tear down its historic architecture to build the Shard, and neither should New York. In the 78-block study area there must be ample room for new development without sacrificing its very best surviving historic architecture.

Interestingly, DCP has indicated that there will be only a handful of new buildings. If so this blanket rezoning should not be necessary. Why couldn't this handful of projects follow the public review process that guides development across the City?

Our concern about the historic buildings is only one of many serious issues this plan raises. Questions remain about the impact on Grand Central Terminal's unused air rights if the city starts selling air rights separately. The future sale of the Terminal's air rights was central to the Supreme Court upholding the Landmarks Law. There are also concerns about the funding stream of the Transportation Improvement Funds, the lack of public review in a committee with a majority of mayoral appointees and the lack of provisions in this plan to address the massive overcrowding in and around Grand Central. Finally, we wonder if the Department of City Planning appreciates the level of public dismay that will be triggered when massive towers rise and surround Grand Central and the Chrysler Building.

As architect Robert AM Stern noted in his op-ed piece in the New York Times last month, "The problem with the so-called planning study is that it's not a plan. It trusts that developers will build world-class buildings, and that we'll sort out the public realm as we go."

The City Planning Department has often used rezoning judiciously, responding to community concerns and harmonizing with existing building patterns. That thoughtful application has improved neighborhoods. If

fully implemented, this plan would do damage to 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 the starting point for revitalizing this significant area, and the preservation and restoration of its historic architecture should be considered an integral part of its success.

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