

**THE NEW YORK
LANDMARKS
CONSERVANCY**

August 7, 2013

**STATEMENT OF THE NEW YORK LANDMARKS CONSERVANCY AT THE NEW YORK CITY
PLANNING COMMISSION REGARDING THE MIDTOWN EAST REZONING PROPOSAL**

Good day, Chair Burden and Commissioners. I am Andrea Goldwyn, speaking on behalf of the New York Landmarks Conservancy. The Landmarks Conservancy is a 40-year old, private, independent, not-for-profit organization. Our mission is to preserve and protect historic resources throughout New York.

As a preservation group, the Conservancy has substantial concerns about the proposed Midtown East rezoning. We believe that this plan has the potential to gut and destroy the very character of this area, encouraging demolition of landmark quality buildings on sites that the Department of City Planning has identified as prime for development.

These buildings are an essential part of the mix that makes New York such a special place. This proposal ignores them. It also ignores that the tech firms rejuvenating the City's economy are flocking to its older buildings, in historic districts such as Chelsea and Flatiron, which feature the amenity of a unique sense of place. London didn't tear down its historic architecture to build the Shard, and neither should New York.

The Landmarks Preservation Commission is reviewing a list of 32 buildings for designation. We support that list, but this area is rich with historic resources, many already eligible for the National Register of Historic Places, that should also be considered for LPC designation. The plan encompasses 70-plus blocks, so there is no reason to take down the best of its architecture, when there is ample room for new design.

The rezoning is racing toward an artificial deadline, out of sync with the Landmarks Commission at exactly the time when they should be working together. The inclusion of a five-year sunrise provision is clear proof that this plan does not need to be approved now.

Our concerns regarding this sweeping proposal go beyond the landmarks issues. An unprecedented coalition of Community Boards issued a thoughtful and detailed analysis of the proposal along with their rejection, but here we are moving along toward a final vote without satisfying answers.

Why is the City cutting out the public out of a review process that has yielded new construction across the five boroughs? If the rezoning will result in just a few buildings, the standard process should be able to handle them.

The City has not offered specifics on how Grand Central and the streets of Midtown East should accommodate existing overcrowding, East Side Access, or the tens of thousands of workers at these new buildings.

We agree with critics who say that the City is selling itself short by setting one price for air rights across 70 very different blocks. And we share concerns that future administrations will start to crack open the lock box in response to the demands of future budgets.

Although the plan rewards energy efficiency, it supports demolishing pre-war buildings, which have built-in efficiency measures.

Finally, we wonder if the Department of City Planning appreciates the level of public dismay that will be triggered upon construction of one or more new 30-FAR building in the tightly packed blocks adjacent to Grand Central, or if a wall of glass towers obscures one of New York's favorite icons, the Chrysler Building.

As architect Robert AM Stern noted in his op-ed piece in the New York Times, "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 Conservancy agrees that change and growth are integral to New York's success; but not at the expense of the distinct historic architecture that makes the City great. We ask the City Planning Commission to reject this plan, and help clear the way towards a new vision for Midtown East that protects the best of our architectural heritage and allows the public a voice in the area's development.

The blend of new and old is what keeps New York vital and unique. The historic architecture of Midtown East should be an integral building block to its success.

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