



The City of New York
Manhattan Community Board 1

Tammy Meltzer CHAIRPERSON | **Lucian Reynolds** DISTRICT MANAGER

May 4, 2021

Sarah Carroll
Chairperson of LPC
New York City Landmarks and Preservation Commission
David N. Dinkins Municipal Building
New York, NY 10007

Good afternoon Chair Carroll and esteemed commissioners,

Once again, thank you for the opportunity to submit testimony before the Landmarks Preservation Commission (LPC) regarding the preservation of the South Street Seaport Historic District and the newly updated application by the Howard Hughes Corporation (HHC) for 250 Water Street.

The approved Landmark documents ([South Street Seaport Historic District](#)) from 1977 clearly denote the inclusion of the parking lot within the historic zone on page 33. Furthermore, please see the attached photo from Frankfort St & Pearl St, a perspective the developer will not show, as it clearly illustrates the Historic District and the architectural dividing line along Pearl and Water streets at Fulton Street where the taller buildings begin. The proposed height of 324 feet would divide the eastern side of the Historic South Street Seaport District and resultantly isolate Titanic Memorial Park and the Southeastern building to appear as out of the district:



The new modification of the tower of a 21 feet overall height reduction is not adequate in addressing the critical issues surrounding height. The proposed height of the tower from the previous 345 feet to the updated 324 feet still remains approximately three times the allowable height of 120 feet as required after the 2003 rezoning. The

modification in height and mass remain out of context with the South Street Seaport historic district's small-scale brick buildings that average 4-5 stories in height. The proposed height exceeds the relative heights of even the buildings parallel to the site and blend only with the commercial buildings in the business district. CB1 supports development at 250 Water Street that align with the goals outlined in the designation report: development that complements the "early 19th century character" of the district. CB1 reiterates that it will only accept a building up to the 120 feet height currently allowed, not a tower that would forever change the unique cultural character of this historic neighborhood.

CB1 has received thousands of signatures on petitions and countless hours of testimony and LPC is acutely aware of how contentious this application has been. It is hard to fathom how the current revision on a project of this magnitude can be considered of inconsequential and trivial difference from previous proposals when even two floors have substantial impact on the district. The newly proposed building height does not fit within the currently allowed zoning envelope and merits consideration to be substantive and eligible for public review. The revised proposal still does not present 250 Water Street as an integral part of the historic district. If the modified changes are approved, CB1 once again asks that LPC respond to the Board, to the community of the South Street Seaport Historic District and to the broader City of New York and explain its decision to reverse decades of its own stated parameters and precedents.

CB1 encourages the Commission to approve applications that align with the historic district's low-scale character and building heights. Given that LPC under four different Chairs rejected nine buildings proposed for this site, all smaller than the one before you now, we urge the Commission to commit to its promise and reject this proposal that is out-of-scale and inappropriate in the South Street Seaport Historic District. CB1 thanks the Commissioners for their tireless efforts to safeguard the City's historic assets, and we look forward to working together to ensure an appropriate and contextual development on the last large-scale development site within the South Street Seaport Historic District. This outcome can truly be achieved as long as community engagement and public review is supported in the review process. On behalf of members of the local community and at large, advocates, experts, and stakeholders, CB1 is counting on the Commission more than ever to preserve one of the last remaining 19th-century neighborhoods in lower Manhattan that has endured for generations. We urge the Commissioners to be a voice for the public and reject this mass development from being built in this beloved historic district and birthplace of New York City.

Sincerely,

A handwritten signature in black ink, appearing to read "T. Meltzer", written over a light gray rectangular background.

Tammy Meltzer, Chairperson