



THE ADVOCATE FOR NEW YORK CITY'S HISTORIC NEIGHBORHOODS



May 1, 2025

Hon. Dan Garodnick Chair,
New York City Planning Commission
120 Broadway
New York, NY 10271
Via Email: MidtownSouthPlan@planning.nyc.gov,
dgarodnick@planning.nyc.gov

Dear Chair Garodnick,

Now that Community Boards 4 and 5 have issued their initial recommendations on the proposed Midtown South Mixed Use Plan, the Historic Districts Council and the New York Landmarks Conservancy would like to reiterate some of our continued concerns about the proposed rezoning. We believe that the current proposal still does not appropriately reflect a plan that works for all stakeholders in Midtown South. Nor does it sustainably meet the Department of City Planning's goal of creating thousands of units of new housing.

The preservation community supports new housing and believes that new housing belongs in Midtown South. Unfortunately, the Department of City Planning's proposed solution, to create a new residential FAR of 18 in much of the rezoning area and 15 in other parts of the rezoning (compared to a lower commercial FAR), creates a strong incentive to demolish rather than reuse thousands of existing and historic buildings across the four quadrants of the rezoning.

The Plan's DEIS identifies 24 buildings, primarily of 1 to 8 stories, as likely development sites. However, independent zoning experts have shown models that predict a much higher chance of demolition when accounting for the Plan's incentivization of zoning lot mergers and its barriers to adaptive reuse of existing buildings.

As proposed, the Plan puts currently overbuilt historic structures at risk. By raising the residential FAR so substantially, and including bonuses for POPS and subway improvements, this Plan encourages developers to see every existing building as underbuilt and expendable. We echo local Community Board recommendations that the Plan lower its proposed FAR in order to incentivize adaptive reuse of existing historic buildings, which will help DCP achieve its housing goals more sustainably, and create a shorter timeline for housing to come online for the neighborhood.

DCP should lower the plan's FAR cap in order to support its own policies regarding landmark TDRs, which were just expanded under City of Yes. As proposed, the plan's substantially increased FAR cap will render landmark TDRs essentially worthless, because the new FAR allowances will make those sales unnecessary. That would be particularly devastating for buildings in the plan's SE quadrant, which contains the largest concentration of historic districts and individual landmarks. Depriving those buildings of the opportunity to utilize TDR revenue, when DCP just expanded the possibility to secure such revenue, would be self-defeating policy.

Finally, the plan's DEIS identified more than 25 sites as NYC Landmarks-eligible. The Landmarks Preservation Commission must move now to designate significant sites before the conclusion of the rezoning process so that these historic resources are protected. We are pleased the LPC is moving forward with an initial list of five sites, but almost all of these 25 sites are crucial to the history of midtown as well as being excellent candidates for adaptive reuse for housing. Local designation will help guide the process of creating thousands of units of new housing in the neighborhood, while also helping to meet sustainability and preservation goals espoused by the administration.

Sincerely,



Frampton Tolbert
Executive Director
Historic Districts Council



Peg Breen
President
New York Landmarks Conservancy

CC: Council Member Keith Powers, Council Member Erik Bottcher