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Gale A. Brewer, Borough President

October 17, 2016

Carl Weisbrod, Chair
City Planning Commission
120 Broadway, 31st Floor
New York, NY 10271

RE: Application Nos. N 170054 ZAM, M 130053(A) ZSM, M 1630054(A) ZSM & M 130055(A) ZSM - South Street Seaport – Pier 17
By South Street Seaport Limited Partnership, [subsidiary] of Howard Hughes Corporation

Dear Chair Weisbrod:

I write in regard to the current application by the Howard Hughes Corporation to pursue a minor modification of their previously approved Pier 17 redevelopment ULURP. On its face, the application as presented appears to meet the critical findings staff at the Department of City Planning must consider before referring such an application to the affected Community Board and to the Commission for discussion and vote. Of course, with no set rules for such presentation, elected officials must rely on staff's good judgment. Therefore, I want to thank your staff for taking the last year to carefully analyze whether this minor modification application meets the original findings under which the Pier 17 ULURP was granted. I especially appreciate the care and attention given to the prominence and design of the public access areas and the controls instituted on the drive lane to ensure pedestrian prominence and access throughout the site.

The LPC approvals that were required for this project to proceed addressed the concerns of Manhattan Community Board 1, Councilmember Margaret Chin and me in regard to the reconstruction of the Tin Building. The result will be a sensitive reconstruction of a contributing building to the South Street Seaport State and National Historic District. In addition, I appreciate the time and substantial effort by the staff at DCP to work through this complicated proposal and ensure that the spirit of the original approvals and the strength of the public access areas' designs are maintained in perpetuity. That commitment to design and public space surrounding the new structure on Pier 17 and the reconstructed Tin Building is clear from the application package. My concern is that the spirit of the Urban Renewal Plan (URP), the purposes of the special district, and the primacy of the South Street Seaport Museum were not as represented in this application, though they have equal importance and weight to public access area design.

Specifically, I am concerned that consistency with the provisions of the Urban Renewal Plan were not confirmed and that findings regarding the essential character, use and future growth of the waterfront and surrounding area, which is also for consideration as part of this

minor modification application, was not held to the same standard as the finding related to its design.

First, the Urban Renewal Plan is in effect until 2068. While the URP has been modified eight times since its adoption in the 1960s to reflect changing market and use trends in the area, at its core the plan always elevated the historic nature of the neighborhood. The Zoning Resolution text adopted in 1998 served to reinforce the goals of the URP, and explicitly states that a specific purpose of the district is to “restore, preserve and assure the use of the South Street Seaport Subdistrict as an area of small historic and restored buildings, open to the waterfront and having a high proportion of public spaces and amenities, including a South Street Seaport Environmental Museum, with associated cultural, recreational and retail activities.”

In the 2013 redevelopment of Pier 17, the City Planning Commission approved a series of changes to the existing lease agreement and for the configuration of buildings on Pier 17. The changes presented to the commission were the same changes presented to Manhattan Community Board 1 and Councilmember Margaret Chin, and received sign-off from the Department of Housing Preservation and Development for consistency with the URP. Beyond the scope of what was placed before the CPC in its report were a number of other changes to that lease. It is my understanding that changes to the lease provisions concerning financial support for the South Street Seaport Museum were approved by EDC in conjunction with the 2013 ULURP. While it could be argued that those changes were not land use related, I believe that some of those changes (combined with an absence of changes that would have given the museum flexibility to use its property to increase revenues) were detrimental to the long term health of the museum and arguably not in keeping with the purposes of the subdistrict.

That is why I am concerned that the application materials referred to Manhattan Community Board 1 make no mention of whether there was any agency review to determine whether the proposed changes before the CPC are also consistent with the goals of the subdistrict and the URP. On its face this may seem irrelevant – the proposed use of the Tin Building is permitted by zoning. However, the operation of the public market is of utmost concern to me and is the component that, if done improperly, would be something detrimental to the spirit of the overall plan for this district. The application makes no mention of the commitment by the developer of 10,000 square feet for a public market made to Councilmember Margaret Chin as part of her review of the original 2013 application and memorialized in the City Council resolution.

Also left out of the application materials is HHC’s proposal – made in public presentations -- for a market akin to what we already see at Le District at Brookfield Place and at Eataly near Madison Square. The Seaport Historic District is not Battery Park or “NoMad.” In my opinion this would constitute an adverse impact to the neighborhood’s essential character. HHC has stated in its application that this modification would facilitate the integration of the Tin Building into its Pier 17 proposal and enlarge the public open space of the pier. To do this in a way that most furthers the goals of the Seaport Subdistrict and the URP and meets the findings under which this special permit was originally granted, I ask the City to work with the developer toward two undertakings.

First, I believe community facility or publicly accessible space within the Tin Building dedicated to food preparation, programming and even cross-programming with the South Street Seaport Museum and local schools is necessary to ensure the use and enjoyment of the facility. This community facility should be in addition to the already-committed 10,000 square feet of public market space. The public market and community facility space should be programmed in conjunction with the Museum, the Community Board, local officials and EDC.

Second, if this proposal will facilitate the use of Tin Building as a public market then that must be memorialized in a transparent fashion together with the governing structure and true monitoring mechanisms within the Restrictive Declaration under consideration by the CPC. Best practices of other great public markets should be considered and adapted to make this a great New York City market. With some effort and creative thinking this space could be a great undertaking for the developer and a true a public asset serving the community, its families and tourists while at the same time furthering the preservation goals of the subdistrict and URP.

I urge the City Planning Commission to protect the purposes of the Seaport Subdistrict and its provisions and the role of the South Street Seaport Museum so that public spaces remain public and that the special character of this neighborhood is protected. I fear these purposes are not held in the same regard by the leaseholder Howard Hughes Corporation. This is not an aspirational ask but a practical one. The role of the Museum and importance of the public spaces within the area, which is a critical component of what makes the district special, have been re-affirmed in eight reiterations of the Urban Renewal Plan and by this body in the commission reports for various redevelopment proposals throughout the years in our oldest historic port and neighborhood.

Sincerely,

A handwritten signature in black ink that reads "Gale A. Brewer". The signature is written in a cursive, flowing style with a large initial "G".

Gale A. Brewer