

October 13, 2023

Landmarks Preservation Commission
1 Centre Street, 9th Floor North
New York, NY 10271

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

To the Commissioners of the Landmarks Preservation Commission and the City Planning Commission,

We write this letter to express serious concern regarding the management of proposed modifications to the 60 Wall Street privately owned public space (POPS) by both the Landmarks Preservation Commission (LPC) and the City Planning Commission (CPC). The below signatories stand together in support of the full consideration of the POPS as an interior landmark before any significant alterations are made.

The application (ULURP No. M850321FZSM) by the developer proposes modifications to the POPS that are more accurately described as a gut renovation than as any sort of modification, and would definitively remove the elements that have given this space its distinctive identity for nearly forty years and in our view justify its landmarking. Below we have summarized a list of objections to both the rationale for approval and the handling of this application that should be considered by all LPC and CPC commissioners ahead of the demolition of this public space:

1. **Diminution of public resources:** Contrary to the narrative of the applicant, the proposed modification reduces the space by 1,450 square feet compared to the original 1985 approval; reduce the number of water features from four to two; significantly limits the amount of landscaped floor area and foliage, to be replaced by an inaccessible “green wall” counted by the applicant toward landscaping area; and replaces five retail frontages with only one.
2. **Poor maintenance and neglect of space:** Many of the issues with the space that the applicant, who is the property owner, offers as reasons for significant alteration have been caused by the property owner’s own thorough neglect of the space, which has led to a dysfunctional bathroom, chronically vacant retail with no effort to find tenants, empty water fountains, broken lights, and dead trees.
3. **Lack of public notice or participation:** The application was only posted online days before its hearing by CPC, with no opportunity for testimony, no public notice, and no notification to Manhattan Community Board 1 or the office of Council Member Christopher Marte, both of whom have previously demonstrated significant interest in the future of this unique POPS.
4. **Dodging of charter mandated responsibility by LPC:** In an official letter to Council Member Marte, LPC cited “support of larger citywide priorities including economic revitalization” as a major reason for acting to not consider the POPS even though the Commission had recognized that the space merits consideration in a previous letter. It is

explicitly the duty of LPC to preserve architecturally significant resources throughout the city regardless of economic development strategies of property owners or of the administration, which should in no way prevent the landmarking of a qualifying site such as this one.

5. **Misleading and sparse information provided to LPC and CPC commissioners:** LPC commissioners were not given the opportunity to consider the widely supported demand for landmarking of this POPS, even though several commissioners have voiced interest in its designation, including Vice Chair Bland and Commissioners Chapin, Chen, and Holford-Smith. CPC commissioners were never briefed on the campaign to protect the space, and when commissioners asked if the space could still be landmarked after the approval of the proposed modifications, they were misleadingly assured that the modifications would not conflict with the space's landmarking merits or architectural significance. As we have stated above, the opposite is true: the "modifications" would remove the very elements that have given the space its architectural importance.

As the largest privately owned public covered pedestrian space in the city, the 60 Wall Street POPS is both an invaluable public resource and a cornerstone of postmodern architecture, an era that has seen increasing recognition through the landmarking of both the AT&T Building and UN Plaza Hotel, both of which have indicated the LPC's recognition of the significance of post-modern architecture to New York's architectural history. To both diminish the public value of the space and to actively ignore an opportunity to preserve a beloved architectural site undermines the mandates of both LPC and CPC, presenting a dangerous precedent for other sites that may be at risk, and results in a loss to all New Yorkers.

Improvements can be made to the space to encourage economic activity that would not diminish its architectural significance or trigger extensive renovation: for example, retail spaces can be leased, trees can be cared for, lighting and seating can be changed and enhanced, and programming can be incorporated to bring more activity to the POPS. Negligence by the property owner should not justify the demolition of a space that is by law a public resource.

We, as a coalition, demand that the 60 Wall Street POPS be fully considered as an interior landmark before any alteration permits are issued by the City. Upon designation, we believe LPC and CPC can work with the property owner to find methods of revitalizing the space that reflect and respect its prominence as a unique public respite in the Financial District.

Council Member Christopher Marte
Manhattan Community Board 1
Docomomo US
Historic Districts Council
Municipal Art Society

New York Landmarks Conservancy
Preservation League of New York State
Preservation Committee of the City Club
Robert A.M. Stern
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