



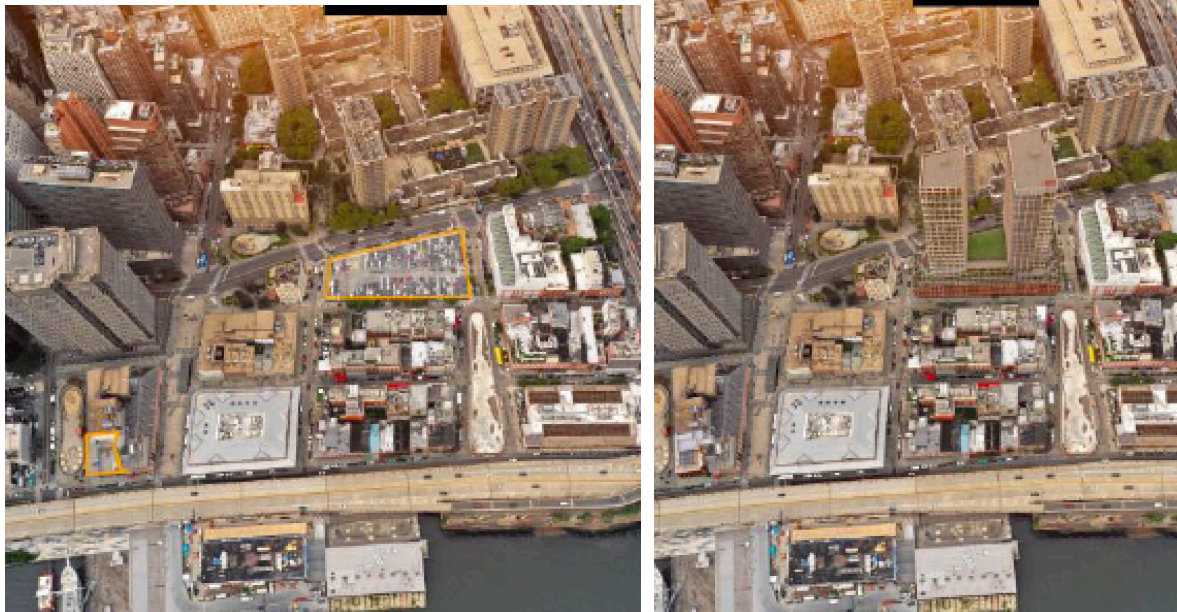
January 2<sup>nd</sup>, 2021

Testimony on the proposed development at 250 Water Street,  
by Howard Hughes Corporation, designed by Skidmore Owings and Merrill

Dear Members of the Landmarks Preservation Commission:

We want to state at the outset that we are not opposed to building on this site, but the proposed development is an inappropriate addition to the South Street Seaport Historic District first for its towers-on-a-podium modern design typology, second for its exaggerated bulk, and third for its architectural expression, which is more related to a kind of “international faux contextualism” than to the specific architectural and material qualities of the Seaport: the proposed low buildings on Water street could be in Hamburg for all we know.

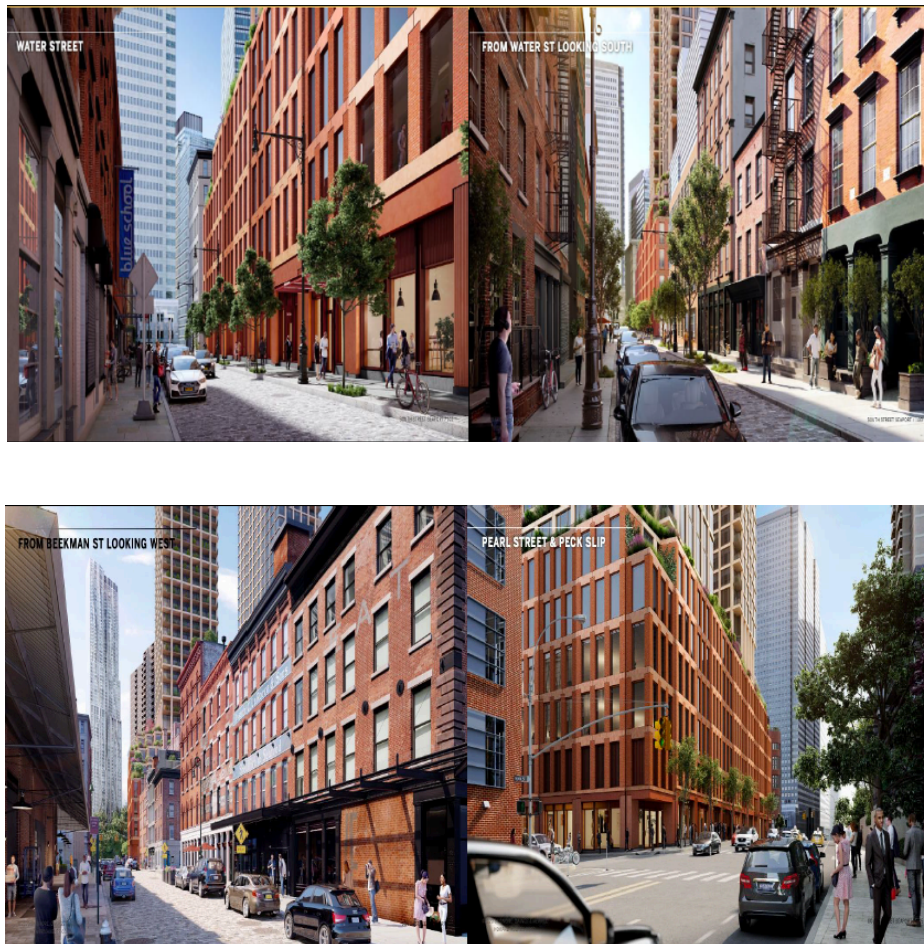
**First point**, the twin-towers-on-a-podium scheme, reminiscent of the World Trade Center, but with a different dress, is inappropriate as it is more related to buildings outside of the historic district, than buildings in the historic district. This is easily understandable from comparing before and after aerial pictures, it is clear that, if approved, this would no longer be a Historic Seaport District site, but a part of developments west of it, so it does not respect and support the special qualities of the district, and in particular the small grain qualities of the 2 blocks between Water Street and the river: this block between Water Street and Pearl Street should reinforce the special qualities of these existing blocks, not undermine them: this scheme makes this block a transition block, in a way excising it from the district - but it should not be a transition block, it is in the historic district and should be of it. This scheme is inappropriate.



**Second**, the building is too big: the two towers, which are within the district, loom over it and ignore it by the very nature of their design, by their size and architectural language. Just because they can be built does not mean that they should. Their design, placement and their size have nothing to do with the delicate special qualities of the district: low scale buildings, aligned on the street, every building with its own entrance, cornices or roofs, punched windows in simple brick walls, it is too obvious that these towers have nothing at all to do with the textures of the historic district. In 1986, the Commission rejected a scheme with two tall buildings, one 12 stories and the other 30 stories, finding that “it would dominate and overwhelm the neighboring buildings in this low scale district”. The historic district is still a low scale district and the proposed towers would still overwhelm it. The bulk of this scheme is inappropriate.

**Third and last point**: the design language itself is inattentive to the special qualities of the historic district, instead of taking its cues from the special qualities of the buildings in the district, in particular simple punched

windows in simple brick walls and specific proportions, it offers a kind of generic contextualism, an oxymoron of course, which is totally unrelated to the Seaport's special architectural qualities. These are not buildings with simple brick walls and punched windows but relentless series of flat piers supporting lintels framing large expanses of glass: so, these generic facades do not support the special qualities of the historic district, they isolate them. So, the architectural language of the design is inappropriate as well.



We urge the Commission to reject this proposal as inappropriate and deleterious to the special architectural, urban and historic qualities of the Seaport Historic District.  
Thank you for the opportunity to testify,

A handwritten signature in black ink, appearing to be 'F. Bollack', written over a horizontal line.

Françoise Bollack  
Chair, Preservation Committee