



**National Trust for
Historic Preservation**
Save the past. Enrich the future.

February 16, 2021

CITY PLANNING COMMISSION
Calendar Information Office – 31st Floor
120 Broadway
New York, NY 10271

RE: Governors Island Rezoning
Application Number: N 210126 ZRM

Dear City Planning Commissioner:

The National Trust for Historic Preservation¹ writes in opposition to the proposed rezoning of Governors Island in Manhattan, New York.

The National Trust has a lengthy and deep connection to Governors Island. In 1998, the National Trust added the island to our 11 Most Endangered Historic Places list, only to see major progress in the years to come with its preservation and redevelopment as a vibrant New York City park and cultural hub. In fact, the National Trust highlighted Governors Island in 2017 as one of the most significant success stories to come out of our 11 Most Endangered Historic Places program.

The National Trust also served as a pass through entity for the island's ownership. In 2003, the General Services Administration conveyed the northern part of the island, including Fort Jay and Castle Williams to the National Trust for \$1. Pursuant to the Antiquities Act, the National Trust then conveyed the land to the U.S. Department of the Interior for use as a national monument administered by the National Park Service. In addition, 150 acres went to the Governors Island Preservation and Education Corporation, formed jointly by the State and City of New York – now The Trust for

¹ The National Trust for Historic Preservation in the United States is a private nonprofit organization chartered by Congress in 1949 to “facilitate public participation” in the preservation of our nation's heritage, and to further the historic preservation policy of the United States. See 54 U.S.C. § 312102(a). With more than one million members and supporters around the country, the National Trust works to protect significant historic sites and to advocate historic preservation as a fundamental value in programs and policies at all levels of government.

Governors Island. That 2003 transaction also established a complex set of covenants, easements, and other restrictions that need to be carefully analyzed. All future development must be consistent with these restrictions.

Governors Island has become a great success and a treasured bucolic escape within New York City for 1 million visitors a year. The Trust for Governors Island is seeking this rezoning based on a rationale of wanting to generate more money through redevelopment on the south island in exchange for promises of year-round access, expanded arts and culture, and a climate change center. While we applaud those goals, this rezoning is far too vast and too dense, allowing for 4.3 million square feet of new building bulk on 33 acres, with towers reaching 20-30 stories in height. Development at this scale would simply overwhelm the island and its village-like setting of low-scale structures and open parkland.

Better alternatives exist that can generate revenue while doing less harm to the National Historic District and the island's irreplaceable and exceptional character as a calm respite just 8 minutes by ferry from the city. We also encourage the Trust for Governors Island to prioritize leasing the millions of square feet that already exist in the many historic structures that are largely vacant. Appropriate new construction is acceptable on the southern end of the island but this proposal is simply too massive. New development should be within the current 35-foot height limit and should be based on broad public input. In addition, we are troubled by the fact that the high-density development concept behind this proposed rezoning would essentially privatize a substantial portion of the island.

In conclusion, the National Trust urges the City Planning Commission to reject this proposed rezoning that would forever alter this extraordinary public landscape.

Sincerely,

Seri Worden

Seri Worden
Senior Field Director
National Trust for Historic Preservation