



Christopher Marte

紐約市市議員馬泰 Council Member, District 1

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August 10, 2026

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

Subject: Opposition to the Renewal of 250 Water Street

Dear Chair Sherman,

I write to you to oppose the renewal of the package of land use actions originally approved to facilitate a new development at 250 Water Street (ULURP Nos. C210438(A)ZSM, N210441ZAM, and M130053(B)ZSM). This renewal application (ULURP Nos. 270001CMM, 270002CMM, and 270003CMM) is pursuant to ZR Section 11-43, which states:

Any authorization or special permit granted by the City Planning Commission ... that would automatically lapse as set forth in Section 11-42 ... may be renewed without public hearing, for two additional three-year terms, provided that the Commission finds that the facts upon which the authorization or special permit was granted have not substantially changed.

I understand that the applicant has filed ahead of the four-year expiration of the initial approvals for this application, and that renewal applications are subject only to approval by the City Planning Commission (the Commission) with no Council oversight and no public hearing. I do, however, wish to provide my testimony against this application, due to both previously raised issues that were never addressed and changes since the original approvals which I believe warrant a rejection of this application.

During the initial review processes, several concerns were raised. These included the use of Fulton, Front, and Water Streets to manipulate zoning lot and density regulations; the rejection of the well-established precedent of disapproval of similar past projects by the Landmarks Preservation Commission (LPC) on this site; and the use of the South Street Seaport Museum as a charitable boon for the project via a donation that required novel legal mechanisms to authorize. Such skirts of various legal requirements to facilitate this real estate venture tainted what many felt was a bad-faith public review process. Without proper acknowledgement or recourse, the downtown community continues to hold these concerns today.

Additionally, the facts upon which the Commission made its initial determination have changed. The Final Environmental Impact Statement (FEIS) was submitted in 2021, and thus the scoping, analysis, and mitigation which were deemed sufficient by the Commission are out of date by at least five years. To argue that none of the relevant environmental conditions have substantially changed would be disingenuous. In any case, the proposed residential count has jumped from 394 to 600 units, confirming that this is a wholly new proposal subject to a new set of environmental conditions.

Further, the application to renew the original permits and approvals does not come with a detailed building design as before, but only a promise to not exceed overall zoning maximums established in 2021. However, the Commission's original opinion included specific consideration for design elements like distribution of floor area, heights, and setbacks across the development site. Without an exact building scheme, there is no way to ensure that such design elements will be included, or that the future building will share any semblance with what was proposed five years ago.

It is because of these concerns that I believe this new application should not qualify for a renewal of its original approvals pursuant to ZR 11-43. Therefore I urge the Commission to reject this application.

Sincerely,

A handwritten signature in black ink, appearing to read 'Christopher Marte', with a stylized, cursive script.

Christopher Marte
New York City Council Member
District 1 - Lower Manhattan