

October 27, 2026

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

**MAS Testimony on the Herald Center Signage Text Amendment and Special Permit
ULURP Nos. C 260282 ZSM and N 260283 ZRM
Calendar No. 22 & 23, CD 5, Manhattan**

Dear Chair Sherman,

The Municipal Art Society of New York (MAS) urges the denial of the proposed zoning text amendment and special permit for illuminated signage at Herald Center in Herald Square. This application raises significant concerns about the precedent that site-specific exceptions could establish for signage regulation citywide. While we recognize the importance of supporting a vibrant commercial district and adapting zoning regulations to contemporary retail needs, we support Manhattan Borough President Hoylman-Sigal's recommendation to deny the application and underscore that the context for this proposal differs from illuminated signage in Times Square and the Penn Center subdistrict.

Herald Square is one of Manhattan's most prominent public spaces, defined by its combination of dense commercial activity, historic urban fabric, and distinctive relationship between architecture, pedestrian life, and the surrounding streetscape. It serves not only as a major destination for shopping and tourism, but also as part of a larger public realm across midtown Manhattan.

A central feature of Herald Square is the James Gordon Bennett Memorial, which MAS cares for through our Adopt-A-Monument program. The siting of the monument underscores the unique character and history of Herald Square and provides a critical convening space that offers respite and reflection amidst the bustling midtown intersection.

An application of this scale and impact should be delivered within a comprehensive, district wide proposal, instead of a singular site. MAS was a leader in saving the iconic lights of Times Square, which lead to the City updating the theater subdistrict zoning to require illuminated signage. The Herald Center proposal, which does not include a subdistrict, could allow the Times Square landscape to extend inappropriately into Herald Square, and could alarmingly set precedent citywide.

Transformative decisions affecting major city destinations must be evaluated in the context of broader public realm and signage goals, rather than solely on an individual applicant's proposal. New York City's signage regulations serve an important public purpose: balancing commercial visibility with neighborhood character, residential quality of life, and the integrity of the public realm. While MAS agrees that many of these regulations may merit updates and revisions, changes must be grounded in a comprehensive planning rationale rather than a narrowly tailored proposal for an individual property.

As New York City pursues greater residential density and expanded housing opportunities, we must balance commercial needs with quality of life, including the impacts of nighttime illumination and visual clutter in mixed-use neighborhoods. We urge the City and the applicant to explore a broader planning framework for Herald Square and to work with the local community board, 34th Street Partnership, residents, and businesses to develop appropriate signage standards that address the larger challenges facing Herald Square's commercial environment. We also encourage the Department of City Planning (DCP) to review illuminated signage regulations citywide to better balance commercial needs with residential quality of life and public interest.

Sincerely,

A handwritten signature in black ink, reading "Keri Butler". The signature is fluid and cursive, with a long, sweeping underline that extends to the right.

Keri Butler
President, Municipal Art Society