



Greenwich
Village
Society for
Historic
Preservation

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November 8, 2012

Hon. Scott Stringer
Manhattan Borough President
One Centre Street, 19th floor
New York, NY 10007

Re: Hudson Square Rezoning ULURP Application Nos. 120380 ZMM, 120381 ZRM

Dear Borough President Stringer:

We write to strongly urge you to recommend several critical changes to above-referenced application, as well as to insist upon designation of the proposed South Village Historic District as requisite mitigation for the increased development pressure the rezoning will bring to bear upon that area directly adjacent to the proposed rezoning.

The proposed rezoning as currently configured would allow much too great of height for new development in the area. The proposed 430 foot height for development of the Duarte Square site is completely out of context for the area, exceeding all but the Trump SoHo which it will nearly match, and should be substantially reduced. The proposed 320 foot height limit for major avenues is also much too great, exceeding the height of all buildings in the area except the Trump SoHo, and should also be substantially reduced. We believe that 210 feet, the height limit in the C6-4A and R10-A contextual district, which has the same bulk allowances as proposed here, would be a much more appropriate height limit, and more closely matches the height of existing buildings in the district.

Regarding bulk, we believe the proposed maximum bulk of 12 FAR, a density often found in Midtown, is much too great as well. The proposed rezoning would increase from 0 the allowable FAR for residential development, which is the most desirable and profitable type of development for this area, creating an incredible windfall for property owners. Because of this, we believe the public has every right to expect lower overall bulk allowances in return. In this case, we believe a maximum bulk allowance of 9 FAR would be much more appropriate.

Finally, the proposed rezoning would inevitably not only increase development in Hudson Square, but increase development pressure upon the neighboring proposed South Village Historic District. This area is already under intense development pressure, and we have seen many of its key historic buildings and characteristic structures destroyed or compromised. In 2009, the Landmarks Preservation Commission promised to consider the entire proposed South Village Historic District for designation, but has failed to do so. In the EIS for both the Hudson Square Rezoning and the NYU 2031 Plan, the proposed South Village Historic District was determined "landmark-eligible" by the Landmarks Preservation Commission, indicating that the Commission recognizes it is worthy of designation, but has simply refused to act to implement such a designation. The EIS for the Hudson Square Rezoning identifies the proposed South Village Historic District as an historic resource which

would suffer a "significant adverse impact" as a result of the rezoning, thus establishing a clear nexus for designation as mitigation for the rezoning. Historic district designations for neighboring impacted areas have been coupled with other rezonings, such as the Atlantic Yards Rezoning and the Prospect Heights Historic District and the West Chelsea Rezoning and the West Chelsea Historic District.

In light of this, I strongly urge you to call for designation of the entire proposed South Village Historic District as absolutely necessary mitigation for the Hudson Square Rezoning if it is to move ahead, as Community Board #2 also did in its October 25th resolution.

Thank you for your consideration, we look forward to hearing back from you.

Sincerely,



Andrew Berman, Executive Director
Greenwich Village Society for Historic Preservation



Sean Sweeney, Director
SoHo Alliance



Richard Blodgett, President
Charlton Street Block Association



Silvia Beam
VanDam Street Block Association



Katy Bordonaro
Co-Chairs, Greenwich Village Community Task Force



Zack Winestine

Cc: City Council Speaker Christine Quinn
City Planning Commission Chair Amanda Burden
State Senator Tom Duane
Assemblymember Deborah Glick
Community Board #2, Manhattan