



Greenwich  
Village  
Society for  
Historic  
Preservation

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**TESTIMONY OF THE GREENWICH VILLAGE SOCIETY  
FOR HISTORIC PRESERVATION  
REGARDING PROPOSED HUDSON SQUARE REZONING  
November 28, 2012**

Thank you for the opportunity to testify before you today. My name is Andrew Berman, and I am the Executive Director of the Greenwich Village Society for Historic Preservation.

Since 2006, GVSHP has called for a rezoning of Hudson Square. The current zoning encourages woefully out-of-scale development, as exemplified by the Trump SoHo (*though we continue to contend that this condo-hotel violates the current M1-6 zoning and therefore never should have been permitted*).

However, the rezoning proposal before you does not address some of the most pressing concerns regarding development in and around Hudson Square, and we believe it would actually make some problems worse.

As proposed, the rezoning would encourage development of a size and density more commonly found in, and more appropriate for, Midtown. The proposed 430 ft. height limit for Subdistrict A is much too great, and should be substantially reduced. The 320 ft. height limit for major avenues is also much too great, and contradicts the purported goal of preserving Hudson Square's character. For example, C6-4A and R10-A contextual districts allow the same 12 FAR as proposed here, but limit height to 210 feet. This reflects the preponderance of existing building heights in the area and we believe would be much more reasonable, and thus we recommend such a limit instead.

In addition, we believe that the proposed allowable density of 12 FAR is also too great. The proposed rezoning offers a large increase in allowable residential FAR – generally the most desirable and most profitable form of development – from the current zero to as high as 12. This is a tremendous windfall for any property owner, and will no doubt increase development activity and interest in the area. The built form of the surrounding buildings and the current and projected problems with traffic and burden upon infrastructure and open space would suggest a lower density would be preferable. Therefore we strongly recommend lowering the maximum allowable FAR for all types of development to 9.

Finally, regardless of the height and bulk limits, the increased development activity catalyzed by the rezoning will no doubt increase pressure upon the

adjacent proposed South Village Historic District, accelerating its already rapid destruction. The Environmental Impact Statement for the rezoning recognizes this, identifying the proposed but undesignated historic district as an “affected historic resource” which would suffer a “significant adverse impact” if the rezoning is passed. In 2007 the NY State Historic Preservation Office found the South Village eligible for the State and National Registers of Historic Places, and earlier this year the Preservation League of NY State named it one of the seven most endangered and historically significant sites in New York State. According to the EIS, the Landmarks Preservation Commission has actually determined the proposed district “landmark eligible,” but they have thus far refused to move ahead with the promise made in 2008 to consider the entire area for designation.

Under current conditions, demolitions, alterations, and out-of-character new construction will continue to slowly destroy the historic character of the South Village. If the Hudson Square Rezoning is adopted, that process will only accelerate.

Therefore we believe it is imperative that the Commission NOT approve the proposed Hudson Square Rezoning UNLESS the remainder of the proposed South Village Historic District is designated.

Thank you.