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November 25, 2019

Marisa Lago, Chair
City Planning Commission
22 Reade Street
New York, NY 10007

Dear Ms. Lago:

At its Full Board meeting on November 21, 2019, CB#2, Manhattan (CB2, Man.), adopted the following resolution:

***Union Square South #20DCP058M** is an application by the Department of City Planning requesting a zoning map and zoning text amendment to expand the Special Union Square District and create a sub-district between Fourth and Fifth Avenues in Manhattan Community District 2.

Whereas:

1. This is an application for a proposed zoning change that would extend the Special Union Square District in include a new subdistrict to the south, which would be referred to as Subdistrict B.
2. Within the proposed Subdistrict B, hotel development and hotel conversions would require a special permit, to be approved by both the City Planning Commission and City Council.
3. The requested action is prompted by a wave of demolitions of original structures being replaced by new development that is out of scale and out of character for the area in terms of both design and use. Take, for example, the Moxy Hotel on East 11th St., which replaced five 19th century residential buildings on that block.
4. Much of the change stems from tech-related development, such as the new demolitions/developments at 799 and 809 Broadway. They are likely to increase with the approval of the upzoning for the new Tech Hub on 14th Street.
5. The City's own EAS for this zoning change shows that the area in question is characterized largely by residential buildings and residential buildings with commercial ground floors and that only 15-20% of the area is composed of purely commercial buildings. There is only one 546-square-foot vacant lot located within the middle of a block, the rest of the study area is improved.

6. Despite this residential character, the proposed zoning change, and city policy, continues to incentivize and project large-scale, purely commercial development for this area.
7. The City's refusal thus far to recognize the historic significance of the current, albeit humble historic building stock that could be demolished as result of this action is disturbing. For example, CB2 strongly disagrees with the DCP's analysis that there would be no adverse impact on neighborhood character if 11 and 13 East 12th St., 180-year-old structures with residences that once housed the renowned artists Reginald Marsh and J. Alden Weir, were demolished.
8. The EAS fails to correctly identify a broad range of historic resources in the area, including landmarked buildings, buildings that are listed on the State and National Registers of Historic Places, buildings, which the LPC itself previously identified as historic resources in past EASes, and buildings of clear architectural and historic significance that SEQR requires be included in the EAS.
9. CB2 agrees that it is important to ensure that future hotel developments are compatible with their surrounding context. However, CB2 has long been on record requesting both a change in zoning to better reflect the predominantly residential character of the University Place/Broadway corridor, which contains an incredibly rich array of architecturally and historically distinguished structures.
10. Thirty to 40 people opposed to this amendment attended this meeting; only two people spoke in favor.
11. The amendment does not address the overdevelopment issues that the area already faces and will undoubtedly result in high-rises replacing low- to mid-rise buildings, which will do nothing to enhance the character of the neighborhood just south of 14th St.
12. Concern was raised regarding the effect on increased traffic on the 12th St. corridor in the wake of the changes on 14th St.
13. Concern was raised about the protection of rent-stabilized and rent-controlled units. In its analysis for the proposed special permit requirement, DCP indicates that they anticipate residential buildings being demolished to make way for new office development, which we consider an undesirable change in use.
14. Extending the Union Square Special District, an area of a vastly and more commercial character, well into the south will open the door to further changes in land use policy that will treat this area not as part of Greenwich Village but as part of the City's commercial core and will further extend Midtown South and Silicon Alley.
15. An example of the aforementioned creep is the demolition of the St. Denis Hotel at 799 Broadway, which resulted in the loss of over 100 small businesses that were vital to the life of this community—and contrary to the City's purported commitment to preserve small businesses.
16. CB2 has long called for landmarking the area and we believe that that is an essential first step. We are also on record in support of contextual rezoning of the area (including a provision and incentive for inclusionary housing, with suggested building heights of 80-120 feet) and in opposition to both hotel and office tower development in the area and feels that this proposed amendment will do nothing to address those concerns. (Resolution to CPC, Jan 23, 2015 regarding contextual rezoning; letter to Landmark

Preservation Commission, Oct. 22, 2018 re landmarking; resolution re special permit for 21 E 12th St., Dec. 2017).

Therefore, be it resolved that CB2 recommends denial of the application until the city has implemented zoning changes for this area that would protect its low- to mid-rise scale and predominantly residential character, and historic district protections that would protect its historic buildings.

Vote: Passed unanimously with 39 Board members in favor.

Please advise us of any decision or action taken in response to this resolution.

Sincerely,



Carter Booth Chair
Community Board #2, Manhattan



Anita Brandt, Co-Chair
Land Use & Business Development Committee
Community Board #2, Manhattan



Frederica Sigel, Co-Chair
Land Use & Business Development Committee
Community Board #2, Manhattan

CB/jt

- c: Hon. Carolyn Maloney, Congresswoman
- Hon. Liz Krueger, State Senator
- Hon. Brad Holyman, State Senator
- Hon. Deborah Glick, Assembly Member
- Hon. Gale A. Brewer, Manhattan Borough President
- Hon. Carlina Rivera, Council Member
- Andrew Cantu, Dept. of City Planning