



Greenwich
Village
Society for
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Preservation

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**TESTIMONY OF THE GREENWICH VILLAGE SOCIETY
FOR HISTORIC PRESERVATION
REGARDING PROPOSED
'ZONING FOR QUALITY AND AFFORDABILITY' TEXT AMENDMENT
CEQR NO. 15DCP104Y**

The Greenwich Village Society for Historic Preservation is the largest membership organization in Greenwich Village, the East Village, and NoHo. We have several serious concerns about the proposed text amendment, and urge that changes be made to the proposed scope of environmental review.

First, we believe that it is critical that the ability to preserve existing height limits within contextual zoning districts, and for Quality Housing developments in non-contextual districts, be a part of any adopted plan. Thus we urge that an alternative be studied wherein new districts with the proposed changes in height limits are created, but the existing districts and their height limits remain intact.

Additionally, we also believe that the proposed changes are extremely generous regarding increased height for developments which offer little or no affordable housing. Thus we urge that an alternative be studied which does not raise the height limits for market rate housing, but only does so for inclusionary developments. Further, given the marginal public benefit of inclusionary developments with 80% luxury units and just 20% affordable units, to which the current proposal grants significant increased height, we urge that an alternative be studied allowing increases only for developments with a much higher percentage of affordable units, or for those which are entirely affordable housing.

Similarly, the current proposal offers very generous allowances of increased bulk and height for affordable senior housing and care facilities. But in fact, the full benefit of increased height and bulk would be offered to developments in which only a fraction of the space might be dedicated to such uses, with the majority serving as luxury, market-rate housing. Thus an alternative should be studied which would apply the proposed changes in allowable bulk and height solely to those developments which are entirely affordable senior housing and care facilities, rather than just partially.

The current proposal would also allow for certain ground floor incursions into rear yards in residential developments in certain districts which are currently prohibited. This will result in less open and green space in the rear yards of buildings and more hard surfaces, with significant potential environmental ramifications regarding heat retention, water runoff and drainage, density of vegetation, air quality, and shade. We urge that this full range of environmental impacts from the reduction in green space in rear yards which the proposal would result in be studied.

With its loosened height limits, larger allowable building envelopes, and in some cases increases in allowable FAR, the current proposal would result in larger and taller developments, make vertical extensions of buildings more likely, and create more incentives for teardowns. This has significant implications in terms of increased shadowing, and impacts upon neighborhood character and historic resources. Historic resources which are not currently regulated by the Landmarks Preservation Commission will be directly affected by such changes, including sites which are listed on, have been determined eligible for, or are potentially eligible for the State and National Registers of Historic Places, and sites which are landmark-eligible but have not been designated. All such historic resources in the areas affected by the proposal should be identified, and the impact of the resulting expanded development upon them should be thoroughly analyzed.

Thank you.