



December 10, 2019

Hon. Gale Brewer, President
Borough of Manhattan
One Centre Street, 19th floor South
New York, NY 10007

Re: Proposed Special Permit Requirement for Hotels South of Union Square

EXECUTIVE DIRECTOR

Andrew Berman

BOARD OF TRUSTEES

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Naomi Usher

Linda Yowell

F. Anthony Zunino III

232 EAST 11TH STREET

NEW YORK NY 10003

212 475-9585

WWW.GVSHP.ORG

Dear Borough President Brewer,

I write regarding your recommendation concerning the proposed special permit requirement for hotels in the area south of Union Square. Village Preservation feels very strongly that this proposed measure not only does not offer the protections which this part of Greenwich Village and the East Village needs and has called for, but would provide no help whatsoever in addressing concerns about new development in the area and in ensuring that neighborhood character is respected, protected, and preserved.

The Department of City Planning's (DCP) own Environmental Assessment Statement (EAS) predicts that should the Special Permit Requirement be enacted and a hotels in the area not developed, office buildings of the same size would be built in their place. DCP specifically predicts this is likely to happen on sites currently occupied by historically significant low-rise buildings with residential units, though DCP's EAS does not recognize them as being historically significant. From our perspective, and I believe from the perspective of most in the affected community, having a historically significant low-rise residential building replaced by an office tower is just as undesirable as having it replaced by a hotel tower. Therefore based upon DCP's own predictions, the special permit requirement would provide absolutely no benefit to or protections for the area.

And such protections are needed, as historic buildings are increasingly being destroyed to make way for new high-rise construction in the area. The single largest driver of such demolition and new construction is the tech industry, which is increasingly concentrating in the area. That pressure has only increased with the approval last year by the City Planning Commission and the City Council of the commercial upzoning for the 14th Street Tech Hub, and the beginning of construction on the project this year.

Additionally, it is disturbing that DCP's EAS for the hotel special permit requirement application is so rife with inaccuracies, inconsistencies and missing information, especially as it relates to historic resources in the area (as documented in [our 35-page letter of November 12, 2009 on which you](#)

[were copied](#)). This is especially disturbing because it is reflective of the city's current unwillingness to recognize the historic significance of the area and consider much-needed expanded landmark protections here.

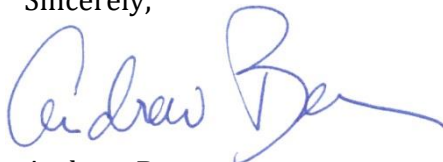
It is especially disturbing that DCP's analysis claims there would be no negative impact upon neighborhood character if these low-rise, residential buildings are replaced by higher-rise commercial ones. This is a predominantly-residential area, and these smaller buildings typically provide some of the most affordable housing units in the area.

It is also concerning that DCP is seeking to make this change by extending the Union Square Special District (USqSD) to the area. The USqSD was designed to protect and reinforce the character of the area around Union Square, and to guide growth there in accordance with the character of that area, which is distinctly different from that of the Greenwich Village and East Village neighborhoods this proposed requirement covers. Unfortunately this seems to be reflective of DCP and the city's view that this area is and should be treated as an extension of Union Square, Midtown South, and the 'Silicon Alley' district north of 14th Street.

As you are aware, both Community Boards 2 and 3 overwhelmingly passed strong resolutions reflecting these sentiments and concerns.

I strongly urge that your recommendation reflect all of these issues and the shortcomings of this proposal and the attached analysis. It is important to use this opportunity to send a message to both the City Planning Commission and the City Council that these sorts of measures which do nothing to address the needs of these communities are not acceptable, and that real landmark and zoning protections, which preserve the area's historic buildings, its low-to-mid-rise scale, and its predominantly residential character, are urgently needed instead.

Sincerely,



Andrew Berman
Executive Director

cc: City Council Speaker Corey Johnson
City Councilmember Carlina Rivera
State Senator Brad Hoylman
Assemblymember Deborah Glick
Community Boards 2 and 3, Manhattan