



**Greenwich  
Village  
Society for  
Historic  
Preservation**

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October 27, 2008

Hon. Amanda Burden  
Director, NYC Department of City Planning  
22 Reade Street  
New York, NY 10007

**Re: Urgent Need for Rezoning in South Village, Far West Village,  
and Hudson Square**

Dear Director Burden:

I write to call to your attention several disturbingly out-of-context and completely inappropriate developments being pursued in the South Village, Far West Village, and Hudson Square, and to again urge the Department of City Planning (DCP) to pursue zoning changes the Greenwich Village Society for Historic Preservation (GVSHP) has long requested in order to preserve the scale and character of these neighborhoods.

**76 Sullivan Street/140 Sixth Avenue in the South Village.** Plans have been filed for an 18-story hotel on this narrow triangular plot of land bounded by Sixth Avenue and Broome Street. The remainder of this block of Sullivan Street is uniformly 1 to 6 story buildings, including several 3-story early 19<sup>th</sup> century houses, two of which are landmarked. This site also lies within an area which has been proposed for historic district designation by GVSHP – a proposal which has very strong support from the surrounding community, and which is being reviewed by the Landmarks Preservation Commission. Unfortunately the M1-5 zoning for the site does not provide any height caps or contextual requirements, and encourages many uses which are notably out-of-character for the surrounding neighborhood. Several years ago, GVSHP requested that the Department consider a contextual rezoning for this area to preserve and reinforce the built character of this predominantly residential neighborhood, and we have reiterated that request several times over the years to DCP. This latest completely inappropriate building plan points to the ever-more urgent need for the Department to take up this long-standing request and seek changes to the zoning for this area as soon as possible.

**68-74 Charlton Street, M1-6 Zone.** Plans have been filed for a 36-story hotel at this site – a shockingly inappropriate scale for this location in Hudson Square, just a half block outside of the diminutively-scaled Charlton-King-VanDam Historic District. A building of this scale would even tower over the 15-20 story loft buildings which are currently, for the most part, the largest buildings in this area. This site lies within the M1-6 zone, of which GVSHP has been asking DCP to change the zoning since at least 2006. As you know, this zone allows an enormous density of development and has absolutely no height limits whatsoever, resulting in other extremely objectionable developments like the Trump SoHo ‘Condo-Hotel.’ I understand from recent meetings that the Department is not currently contemplating a zoning change for this area, but is

entertaining a potential zoning change application from Trinity Real Estate, an area developer/property owner. This neighborhood needs a zoning change as soon as possible, and I again urge DCP to take up this issue to ensure that the height and scale of allowable development in this area is reduced immediately.

**C6-1 Zone in the Far West Village.** Six months ago, GVSHIP wrote to you to urge the Department to consider revising the zoning for the C6-1 district in the Far West Village, which lies between Greenwich and Washington Streets, between West 12<sup>th</sup> and West 10<sup>th</sup> Street, covering all or part of six city blocks (see attached letter). This anomalous zoning district for this area allows out-of-context and otherwise undesirable development. The C6-1 zone has no height limits or contextual controls, and includes significant bonuses for commercial and community facility development as compared to residential uses. Several out-of-scale developments have been proposed for this district in recent months utilizing the commercial and community facility bulk differential, and there are several more 'soft-sites' in this district where further development could take place (a list of which have been provided to the Department). GVSHIP and many in this community are very concerned about such possibilities, and we have requested that the Department consider revisions to this zoning district to prevent such inappropriate incursions. Unfortunately, the Department has not responded to the original letter on this matter, and several phone calls and e-mails to the Department's Manhattan Office on this topic have not been returned. Given the strong level of community concern about this issue, I hope that DCP will in fact be willing to work with us and other concerned neighbors about this problem stemming from the existing zoning.

The planned developments cited in this letter have the potential to irreversibly change the character of these neighborhoods. Earlier this year the Department approved, with modifications, a developer-requested rezoning roughly in the middle of the three zoning districts discussed in this letter. I hope that the Department will give equal, if not greater, consideration to the long-standing requests of these local communities to change the zoning in these areas, in order to preserve the vital character of these neighborhoods.

I look forward to hearing back regarding the assistance we seek from the Department.

Sincerely,



Andrew Berman  
Executive Director

Cc: City Council Speaker Christine Quinn  
Manhattan Borough President Scott Stringer  
Landmarks Preservation Commission Chair Robert Tierney  
State Senator Tom Duane  
Assemblymember Deborah Glick  
City Council Zoning Subcommittee Chair Tony Avella  
Community Board #2





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April 17, 2008

Hon. Amanda Burden  
Chair, New York City Planning Commission  
22 Reade Street  
New York, NY 10007

**Re: C6-1 Zone in the Far West Village, Manhattan**

Dear Chair Burden:

I write to ask the Department of City Planning to consider a change in zoning for the C6-1 district in the Far West Village, which lies between Greenwich and Washington Streets, between West 12<sup>th</sup> and West 10<sup>th</sup> Streets, covering all or part of six city blocks.

The zoning is somewhat anomalous for this area, and we believe encourages and allows out-of-context and otherwise undesirable development. The zoning has no contextual controls and allows up to 6 FAR for commercial development, and 6.5 for community facility. All of the zone is either on narrow mid-blocks or faces Washington or Greenwich Streets, which are themselves relatively narrow, modestly-scaled streets. Additionally, the zoning on the opposite sides of both Greenwich and Washington from this zone is C1-6A, R-6, or C1-6, which for the most part only allows a much more appropriate and modest scale of development. As you know, a base FAR of 6.5 can easily allow a 10-story building (or higher with air rights added in), which we do not believe is an appropriate scale for these narrow streets in the historic Far West Village.

Additionally, unlike most of the other nearby zoning districts, the C6-1 zone greatly favors commercial or community facility development over residential development. While we have no objection to commercial or community facility uses as a part of the mix of the neighborhood, we fear that this heavy weighting in the zoning towards such uses will encourage only this kind of development, which is not reflective of the largely residential but somewhat mixed-use nature of this neighborhood. By contrast, other surrounding zones, including those which the City Planning Commission approved in the area as part of the 2005 rezoning, allow commercial uses but at a more modest FAR. A zoning district such as the C1-6A zone adopted across Washington Street in 2005, which allows a maximum FAR of 4 and which has contextual height caps of 65 and 80 feet, would seem much more appropriate to guide development in this area.

The need for such appropriate guidance is more than theoretical. There are several 'soft sites' in this zoning district and we have recently witnessed two rather large new development proposals move ahead in recent weeks. One was a hotel, and the other was a mixed use building, both of which exploited the higher allowable density for commercial and community facility uses to achieve a height much greater than we and many neighbors believed appropriate for their sites, and incorporating some uses about which there are great concerns by many neighbors (it should be noted that one development, at 145 Perry Street, was approved with a

modest reduction in size by the Landmarks Preservation Commission, while the second at 685 Washington Street is still awaiting approval).

The Greenwich Village Society for Historic Preservation is working with the Greenwich Village Community Task Force and other local community groups and neighbors to reach out to the Community Board and local elected officials to seek their support for and participation in this effort. I hope that the Department of City Planning will be willing to work with us to see such a change realized in order to help protect and maintain the character of this very special part of New York.

Sincerely,

A handwritten signature in dark ink, appearing to read "Andrew Berman", with a stylized flourish at the end.

Andrew Berman  
Executive Director