







June 25, 2013

Hon. Deborah Glick 853 Broadway, Suite 1518 New York, NY 10003

Hon. Richard Gottfried 242 West 27th Street New York, NY 10001

Hon. Brad Hoylman 322 8th Avenue, Suite 1700 New York, NY 10001

Re: Assembly Bill A8031/Senate Bill 5824, the Hudson River Park Bill, and allowance for transfer of development rights to inland communities

Dear Assemblymembers Glick and Gottfried and State Senator Hoylman:

We write to express our extreme concern about the recently-passed, above-referenced legislation. We are particularly troubled by the provision allowing for the first time the transfer of development rights from piers in the Hudson River Park to neighborhoods one block inland. We are also deeply concerned about the speed with which this bill moved, the lack of consultation with affected communities, and the lack of available information about the broad potential impact this bill would have on increasing allowable development in our neighborhoods.

Most of us first learned about this bill early last week when it was first reported upon in the press, and was already on the verge of approval in the State Assembly. We were quite taken aback to discover that a piece of legislation which could lead to such profound changes in the landscape and development of our communities would not only be considered but voted upon with so little notification to or discussion with the affected communities, and so little information made available about the bill's provisions and their potential impacts. We have come to expect a much greater degree of consultation and engagement on land use and development issues such as these, particularly from elected officials such as yourselves.

The provision of the bill allowing the transfer of development rights from Hudson River Park piers for use one block inland is deeply concerning to us. This will have the effect of increasing by hundreds of thousands and possibly millions of square feet the development potential in our neighborhoods on blocks along the entire length of the Hudson River Park. The current zoning in our neighborhoods already allows a tremendous amount of new development, and has in many cases recently been changed to allow even more additional

development. That a further step would now be taken to even further increase the development potential in our neighborhoods, especially at such sensitive locations as these along the waterfront, is deeply troubling to us.

In addition to the lack of consultation, the lack of information about the impact this law allowing the transfer of development rights would have is deeply concerning. No analysis has been made available to the public of the full amount of additional development rights involved, exactly where they can be used and how much can be used at those locations, and the impacts the use of these additional development rights inland would have. Disturbingly, not only has such information and analysis not been made available to the public, it does not appear that such information has been gathered nor such analysis performed or reviewed as part of the consideration of this bill.

It is not yet clear if this bill will, by itself, immediately allow the transfer of development rights and instantly increase the development potential in our neighborhoods, or if this is the first of two steps required to allow such transfers, the second requiring some action on the part of the City. It would be profoundly damaging and deeply disturbing if this legislation allowed any transfers right away without additional approvals. But even if the passage of this law by the State Legislature is just the first step in a two-step approval process, we are extremely troubled by this action, as it undeniably moves us further in the direction of overdevelopment of our neighborhoods.

Moving forward, we urge you to provide not only us but the larger public with clear additional information about the effect this legislation will have. It is essential that the public be informed of how the development rights transfers enabled by this legislation would work, what the process would be for their utilization, which piers have transferable development rights and how much, the locations to which those development rights can potentially be transferred and used and how much additional development rights can be used at each location, and the scope and scale of development which would be allowable if those development rights are utilized at each location.

Sincerely,

Andrew Berman, Executive Director

Greenwich Village Society for Historic Preservation

Bill Borock, President

Council of Chelsea Block Associations

Lesley Doyel, Co-President

1 en Das

Save Chelsea

Zack Winestine, Co-Chair Greenwich Village

Lack Wirestine

Community Task Force

Cc: City Council Speaker Christine Quinn Madelyn Wils, Hudson River Park Trust Amanda Burden, Department of City Planning Community Board #2, Manhattan Community Board #4, Manhattan