



**Greenwich
Village
Society for
Historic
Preservation**

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June 12, 2007

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

Re: Rezoning of Hudson Square

Dear Director Burden:

Thank you for your May 22nd letter in response to my April 23rd letter regarding the need to rezone parts of Hudson Square, among other issues.

As the Greenwich Village Society for Historic Preservation and many other groups have expressed for some time now, there is a strong feeling that the zoning for much of Hudson Square needs to be changed right away. I was concerned that your letter seemed to indicate that the City felt that rezoning of a small section of Hudson Square in 2003 was adequate to guide future development in this entire area, and that “the community board, local civic groups, and elected officials” felt the same way. I can only speak for GVSHP, but we certainly do not feel that the current zoning is adequate, nor do any of the local civic groups with whom we work.

As you know, the rezoning in 2003 of three small blocks in the southwestern corner of Hudson Square did nothing to affect the M1-6 zone which covers the bulk of this neighborhood, and which has allowed development of an egregious scale, such as the 45-story Trump ‘Condo-Hotel’ now under construction. M1-6 zoning allows development of up to 12 FAR as-of-right with a plaza bonus, has absolutely no height limits, no contextual controls, and no limits upon the transfer of air rights, producing buildings of a scale and form we find totally inappropriate for this neighborhood. In addition to the Trump development, which has been universally condemned by local civic groups, several other woefully inappropriately-scaled developments are underway on Watts Street and elsewhere in the M1-6 zone. With the City’s recent decision to reinterpret the restrictions in manufacturing zones to allow ‘condo-hotel’ development, such as in the Trump case, the floodgates to new and even more lucrative types of inappropriately-scaled development have suddenly been further opened for this neighborhood. Without changes to the zoning soon, we will likely see an increasing pace of such problematic development.

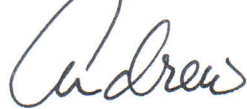
Thus contrary to your assertion, I believe that the consensus of this community is that this zoning must be changed as soon as possible. While the threats of inappropriate development in the neighboring M1-5 and M2-4 zones are not quite as great, I believe this community would welcome the opportunity to discuss other zoning options for these blocks of Hudson Square as well, which can still allow substantially inappropriate development. Here too this is made more urgent by the City’s recent decision, which the Department supported, to reinterpret the restrictions in manufacturing zones to allow the construction of

'condo-hotels,' thus greatly increasing the likelihood of new, high-rise development in these and other M1 zones.

I hope you and the Department will reconsider your stance and move ahead with consideration of a rezoning of this area as soon as possible. To allow more of the type of development we are seeing in Hudson Square would be a terrible mistake.

On a related note, it seems there may have been some confusion on your part about the reason for my April 23rd letter to you, which was primarily about proposed development of Pier 40. GVSHP is very concerned that poorly chosen development at nearby Pier 40 will only accelerate the rate of inappropriate development in neighboring Hudson Square. It is because the Department of City Planning would have to approve any zoning changes for Hudson Square, as well as the zoning changes required for the proposed developments on Pier 40 about which we are so concerned, that this letter was directed to you.

Sincerely,



Andrew Berman
Executive Director

Cc: Mayor Michael Bloomberg
Manhattan Borough President Scott Stringer
City Council Speaker Christine Quinn
Congressman Jerrold Nadler
State Senator Tom Duane
State Senator Martin Connor
Assemblymember Deborah Glick
City Council Member Alan Gerson
City Council Land Use Committee Chair Melinda Katz
City Council Zoning Subcommittee Chair Tony Avella
Community Board #2, Manhattan
Community Board #1, Manhattan
Greenwich Village Community Task Force
Federation to Preserve the Greenwich Village Waterfront and Great Port
West Village Committee
SoHo Alliance
Friends of Hudson Square
SoHo Arts Council
Tribeca Community Association
Canal West Coalition
West Village Houses
Pier Park and Playground Association
Thompson Sullivan Coalition
Greenwich Village Block Associations

Charlton Street Block Association
Vandam Street Block Association
West Houston Street Block Association
Bedford Downing Block Association
Morton Street Block Association
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