



Greenwich
Village
Society for
Historic
Preservation

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July 28, 2016

Hon. Gale Brewer
Manhattan Borough President
Municipal Building, One Centre Street
New York, NY 10007

**Re: Proposed Zoning Map Amendment and Special Permits for
550 Washington Street (St. John's Terminal), and creation of
Special Hudson River Park District**

Dear Borough President Brewer:

The proposed package of approvals for the above-referenced project, and the proposed development, would have a profound impact not only upon the three-block site itself, but the Hudson River Park, the nearby South Village neighborhood, and the entire Community Board #2 waterfront. **The Greenwich Village Society for Historic Preservation, the largest membership organization in Greenwich Village, the East Village, and NoHo, has deep and broad concerns regarding the proposed approvals, which would:**

- Increase the allowable size of development on the three-block site by 70%
- Change the allowable uses on the site from limited commercial and manufacturing uses to vastly more lucrative residential uses and hotel uses on the entire site
- Allow height and setback waivers which would place a taller and larger development on the north end of the site, closer to the less dense and more predominantly residential sections of the West and South Village
- Allow the transfer of 200,000 square feet of air rights from Pier 40 within the Hudson River Park, and create a potential framework for future air rights transfers from the park

We do not believe that adequate steps have been taken to address the proposal's far-reaching negative impacts, nor do we believe that the enormous windfall to come to this developer from the changes being sought would be nearly balanced by the trade-offs or benefits to the public, which include:

- \$100 million for repairs to Pier 40

- 476 units of affordable housing, which amounts to 19% of the zoning floor area of the proposed development and 25% of the zoning floor area of the proposed residential development

Thus we urge you to recommend denial of all aspects of the application unless the following changes are made and additional actions are taken:

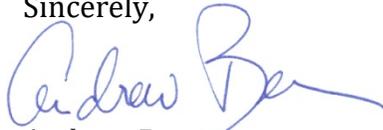
1. **The final phase of the proposed South Village Historic District is calendared, heard, and designated in its entirety.** The proposed rezoning and development will no doubt vastly increase development pressure upon neighboring areas, most especially the section of the South Village south of Houston Street. This historic area, listed on the State and National Registers of Historic Places, lacks landmark protections and has inadequate zoning which would allow 300 ft. tall towers amongst its largely three-to-six story, 19th and early 20th century structures. For over ten years GVSHP and advocates have demanded that the City consider landmark protections for this area, but they have refused, even as landmark designation of the other two-thirds of the South Village have largely been designated. No rezoning of the St. John's site should advance and until and unless this area receives the landmark designation it needs and deserves.
2. **Any further future air rights transfers from the Hudson River Park to sites within Community Board #2 are permanently restricted.** The 200,000 square feet of air rights from Pier 40 proposed to be transferred to the St. John's site is merely the tip of the iceberg of an estimated 1.5 million square feet of air rights which could be transferred to inland blocks as a result of state legislation passed in 2013. GVSHP strongly disagrees with allowing any air rights from the park to be transferred inland, and believes that there are other alternatives to funding needed repairs to and construction within the park which have not been explored, such as placing a dedicated tax upon new development in areas adjacent to the park. However, the state legislature appears unwilling to repeal the air rights transfer allowance, city officials appear unwilling to consider other options for funding the park, and many advocates for Pier 40 believe that under the circumstances this air rights transfer is the only realistic way to fund the pier's reconstruction in a timeframe that will preserve the well-used playing fields. In light of this, it is essential that any allowance for the proposed transfer of 200,000

square feet of air rights to the St. John's site must only be allowed if accompanied by language in the proposed Hudson River Park Special District, and/or through other means, that would ensure that no future air rights transfers from the park take place within Community Board #2.

3. **'Big Box' and 'destination' retail are eliminated from the proposed development, and the allowable size of individual retail units (other than a supermarket) are reduced to a size commensurate with local retail.** The proposed development would contain between 200,000 and 300,000 square feet of retail space, most of it "destination retail" and/or "big box" stores. By comparison, the retail space at Chelsea Market currently totals 80,000 sq. ft., while the retail space in the entire six-block Rockefeller Center Concourse is 224,000 sq. ft.. This is an enormous amount of retail, which would largely draw customers from considerable distances. With little mass transit nearby, this would undoubtedly mean an enormous increase in vehicular traffic, to an area already significantly overburdened in terms of vehicular traffic. Thus it is imperative that the version of the plan containing 'Big Box' stores is not approved, and that limitations be placed upon the size and type of stores so that they are geared towards local retail, and the size for all stores (except a supermarket) are limited to typical dimensions for an individual local retail establishment.

Thank you for your attention to this matter, and I look forward to your response.

Sincerely,



Andrew Berman
Executive Director

Cc: City Councilmember Corey Johnson
Community Board #2, Manhattan
South Village Neighbors
Greenwich Village Community Task Force