



**TESTIMONY REGARDING  
UNION SQUARE SOUTH HOTEL SPECIAL PERMIT  
Items 26 & 27 -- C 200102 ZMM  
January 22, 2020**

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I am here representing Village Preservation, the largest membership organization in Greenwich Village, the East Village, and NoHo, which is the area directly impacted by this proposal. The proposed hotel special permit plan offers virtually no protections for the Greenwich Village and East Village neighborhoods south of Union Square. They are facing a flood of demolitions and out-of-scale, out-of-character new development, largely fueled by tech development, and exacerbated by the recent approval by this body and the City Council of the 14<sup>th</sup> Street Tech Hub.

By the Department of City Planning's own analysis, if this hotel special permit measure is enacted and special permits for hotel development in the area are denied, low-scale, residential, historic buildings will still be destroyed to make way for high-rise commercial development. The only difference is that the new development will be office towers rather than hotels. This is cold comfort at best for our neighborhoods.

In fact, while we have lobbied for restrictions on large-scale hotel development in the area, office building development is the much larger driver of demolition and out-of-character construction. To limit one to merely to pave the way for the other, as the Department of City Planning's own EAS projects will happen, offers no relief whatsoever to these predominantly residential, low-to-mid-rise neighborhoods.

Instead, what City Planning should be doing, in concert with the Landmarks Preservation Commission, is extending landmark protections to the myriad historic resources in the area, and changing the zoning to reinforce the predominantly residential and low-to-mid-rise character of the neighborhood as we have called for, and as both affected community boards have long endorsed. I will remind you that for nearly five years our organization, with the full support of Community Boards 2 & 3, has argued for contextual zoning for the sections of this area that don't have it, adding affordable housing incentives or requirements for the areas without them, and reducing the incentive for oversized commercial development in the areas where zoning allows it. The Department has consistently refused to consider such measures.

On its own, the proposed measure is not half a loaf – it's no loaf. We urge the Department to come back with a proposal that offers real protections for Greenwich Village and the East Village.

It should be noted that the Environmental Assessment Statement for this proposal is in some ways even more disappointing and disturbing than the proposal itself. The EAS specifically calls buildings which it identifies as likely development sites like 88 East 10<sup>th</sup> Street and 11 East 12<sup>th</sup> Street “not historically significant,” and claims that the neighborhood would suffer no negative impact upon its character if these low-rise, residential buildings were replaced with high-rise office towers. This is especially troubling given that these largely intact ca. 1840 Greek Revival rowhouses were also the home and studios of great American artists Willem de Kooning, Reginald Marsh, and J. Alden Weir at critical stages of their careers.

In fact, while the EAS was recently corrected to eliminate some of the most glaring mistakes we identified – including characterizing seventeen stories of apartments as commercial space and failing to identify several landmarked and National Register-listed buildings as historic resources -- the analysis for this proposal still leaves out literally scores of historically and architecturally significant buildings. Worse, it says there would be no loss to neighborhood character if they and the residential units many of them contain are replaced by office towers.

The response to this proposal has been virtually unanimous – Community Boards 2 and 3 both rejected it, urging the City to come back with something which addresses overdevelopment in the area, and Community Board 5 echoed their sentiments. The Borough President issued a strong recommendation in this same vein. Turnout at public hearings has been unanimous in this regard. The Department has received more than 750 letters from our members alone expressing similar sentiments.

The only entities which seem to want or support this proposal are the one union which endorsed the Mayor in his failed presidential campaign and the large hotel operators who have generously donated to the Mayor and see this measure as a way of eliminating future competition. The only reason why this measure for this specific area is being advanced is because it was part of the deal between Councilmember Carlina Rivera and Mayor de Blasio for her agreement to vote for the Mayor’s Tech Hub, and is supposed to offer some protections for the affected neighborhoods in return. Unfortunately, in reality it does not.

DCP’s own EAS shows that about 70% of the lots in this area are used for residential purposes, incl. those with commercial ground floors. Offices, hotels, and other commercial uses account for only 15% of lots in the area. This illustrates how this proposed measure, on its own, is a meaningless gesture which will address none of our concerns about preserving neighborhood character. Paired with real landmark protections and real zoning protections that incentivize housing over office buildings in these predominantly residential neighborhoods, it would. But disappointingly, the City seems to be nowhere near ready or willing to do that yet.