

# Urban Cartographics

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October 20, 2025

Chairwoman Shampa Chanda  
New York City Board of Standards and Appeals  
22 Reade, Main Floor  
New York, New York 10007

**Re: Uniqueness Study for  
51 Little West 12<sup>th</sup> Street, Manhattan**

Dear Chairwoman Chanda and Commissioners:

This study was prepared in support of a variance application filed for the above-referenced site (hereafter, the “Site”) which seeks to allow for the development of a new mixed-use building, contrary to the applicable use regulations (ZR Sect. 42-10). The Site is currently vacant land and is located in an M1-5 district that was mapped with the adoption of the 1961 Zoning Resolution, 64 years ago.

The focus of this report is the applicant's contention that unique physical conditions give rise to hardship in developing the Site as-of-right. Specifically, that the narrow width and small size of the Site give rise to hardship in developing a commercial or manufacturing building in strict compliance with the M1-5 district's use regulations. *(The application also cites adverse subsurface conditions [poor soil quality, and a high water table] as contributing to the difficulty in developing the Site.)* The applicant will explain the hardship that arises from these conditions, and how they impact their ability to earn a return on investment. The purpose of this study is to show that the hardship complained of is unique—to support the Board's finding under ZR §72-21(a).

## Background

The Site is a rectangular interior lot located on the north side of Little West 12<sup>th</sup> Street between Washington Street and West Street in the Meatpacking District neighborhood of Manhattan. It is identified on the City's tax map as Block 645, Lot 21, contains 2,581 square feet of lot area, and is wholly in an M1-5 district that was mapped with the adoption of the 1961 Zoning Resolution (i.e. the zoning of the Site has not changed in over 60 years). The Site has 25 feet of street frontage on Little West 12<sup>th</sup> Street (a narrow, one-way street, mapped at 60 feet wide), with 103.25 feet of lot depth. The Site is currently vacant land, but was improved upon with a four-story commercial building until 2010.

The M1-5 district in which the Site is located generally extends from the Site north to West 16<sup>th</sup> Street, east to Hudson Street, south to Gansevoort Street, and west to West Street. Beyond that, in all directions other than the waterfront, are commercial and residential zoning districts wherein the proposed residential use would be permitted as-of-right. To be sure, those districts reflect a distinct and intentional policy change towards welcoming residential development; when the Zoning Resolution was first adopted, pure Manufacturing districts extended from the Site for several blocks (indeed for *several miles*, to the north). Today, the neighborhood's manufacturing zoning says much more about its past than its future. Although the historic building stock is largely comprised of loft-style buildings designed for manufacturing use in the late 19<sup>th</sup> and early 20<sup>th</sup> century—when the High Line was a freight railroad right-of-way—today, the neighborhood is known for high-end retail and dining, hotels, and tourist traffic (in large part driven by the relatively new Whitney Museum located on the block to the south of the Site). And the “meatpacking” facilities, which give the neighborhood its name, present en masse as recently as 20 years ago, are today mostly gone from the area.

In the present day, the upper floors of the neighborhood's large loft-style buildings are filled with fashionable high-ceiling offices spaces, particular attractive to the so-called “TAMI”<sup>1</sup> industries; the office above Chelsea Market (on West 15<sup>th</sup>, between 9<sup>th</sup> and 10<sup>th</sup>), 111 Eighth Avenue, a massive Google office building (West 15<sup>th</sup> between 8<sup>th</sup> and 9<sup>th</sup>), the well-known Milk Studios production facility (across West 15<sup>th</sup> Street to the south of Chelsea Market). And, its also worth noting that some of the larger sites without a path towards adaptive reuse were developed with hotels—formerly as-of-right in M1-5 districts—prior to such use requiring a Special Permit from the City Planning Commission (examples include the 19-story Standard Hotel, which adjoins and nearly envelopes the Site, and the 13-story Gansevoort Hotel, a block to the east).

All of these examples reflect that there is very little genuine “manufacturing” actually occurring in this neighborhood. Which makes perfect sense: the buildings are relatively small and tall (for modern manufacturing uses), the neighborhood is comprised of narrow streets ill-suited to truck traffic (to say nothing of the fact that many are still cobblestone), and there is neither good access to highways nor the region's freight rail network.

While many of the larger buildings, on larger sites, have found a new purpose in being put to office use, that leaves the neighborhood's smaller and more narrow buildings, that fill the gaps between the hulking lofts, without an obvious future. The ground floor of nearly every one of these buildings has been repurposed to join the area's extensive retail and dining offerings. On the upper floors of these smaller buildings we find second-story retail, and some smaller professional offices. But notably, a number of them contain residential use on the upper floors that, in all likelihood, is nonconforming (i.e., predates the Zoning Resolution).

As discussed in greater detail in the following sections, if any one of these conditions existed on the on the Site, we might not be here. That is, if the Site were much larger; if the Site had been developed with a hotel when such use was permitted by right; if the Site were already improved upon with a usable building, or better yet, a usable building that enjoyed the right to a nonconforming residential use; maybe this application would be unnecessary.

But, the Site enjoys none of these advantageous conditions. The question, then, is whether that difficulty is unique.

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<sup>1</sup> Technology, Advertising, Media, and Information Technology.

## Discussion

Our inquiry begins with the definition of a study area. In this case, given the nature of the relief sought (residential use contrary to the use regulations of the M1-5 district), we selected the area of the subject M1-5 district south of West 17<sup>th</sup> Street, and east of West Street (hereafter, the “Study Area”). Beyond that is the area that has always been mapped, or was more recently mapped, with zoning districts where residential use is permitted. (To be clear, *all* of the districts east of West Street that adjoin the subject M1-5 district—C6-4, C6-3, R8, C2-5, C1-6A, R8B, C6-2A, C1-6, R6, C4-4A—permit residential use). The Study Area extends between 500-1,400 feet from the Site and contains 86 properties.

The first of the attached maps is simply a land use and zoning map of the Study Area; the second shows the 86 properties in the Study Area,

### *Map A – Narrow and Smaller Lots*

The first substantive map attached (Map A) shows lots less than or equal to 25 feet in width **and** less than 2,600 square feet in lot area. The width and area conditions are conflated in the query as they compound one another; less difficulty would arise in developing the Site if only one of the two conditions were true. As shown on the map, of the Study Area's 23 lots, just 23 (including the Site) are as narrow and as small as the Site is. While exceptional, though, the condition is not unique.

### *Map B – Common Ownership*

One exception to finding that lots as small and as narrow as the Site suffer from a hardship in being developed in strict conformance with the zoning, is several adjoining sites that are under common ownership. Where that condition exists, the individual sites can be aggregated for the purpose of establishing a more sizable development site. And in the opposite, a decision not to do so can be equated to self-creating the physical condition giving rise to hardship. Our analysis found that of the 23 sites (including the Site) that are less than or equal to 25 feet in width **and** less than 2,600 square feet in lot area, 10 are under common ownership with an adjoining property such that when the several sites are combined, the hardship no longer exists.

### *Map C – Lots With an Existing Building (1.0 FAR or greater)*

As mentioned in the discussion that precedes the analysis one of things that, if true, would mitigate the hardship presented, is the presence of an existing usable building on the Site. In other words, if the Site were improved upon with an existing building that could be used to achieve a reasonable return, as opposed to having to perform ground-up new construction, then the hardship presented by the Site's physical conditions would not be as great—it might be able to earn a reasonable return. Unfortunately, the Site is a vacant lot.

Of the 13 remaining properties (those left after the filters described in Maps A and B), all but the Site are improved upon with an existing building of 1.0 or greater FAR (i.e. a building of two or more stories in height).

Simply put, **the Site is the only small and narrow vacant lot**—indeed, the only small and narrow lot with less than a two-story building on it—in the entire Study Area. In other words, not a single other property in the Study Area faces the same practical difficulties in being developed in strict conformance with the M1-5 zoning as the Site does; to say nothing of the other adverse subsurface site conditions the applicant has cited as giving rise to hardship.

For that reason, we conclude that the Site suffers from a set of practical difficulties, resulting from its narrow width, small size, and underdeveloped condition that is unique, and thus satisfies the Board's finding under ZR §72-21(a).

Please feel free to contact me if you should have any questions or require any additional information.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Ian Rasmussen', with a stylized flourish at the end.




Ian Rasmussen, AICP

# 51 Little West 12th Street, Manhattan



## Land Use and Zoning Map of the Study Area

Block: 645, Lot: 21

### Project Information

-  Study Area (Surrounding M1-5 District)
-  Radii from Site
-  Site

### Zoning Districts

-  Zoning Districts
-  Special Districts

### Block Numbers

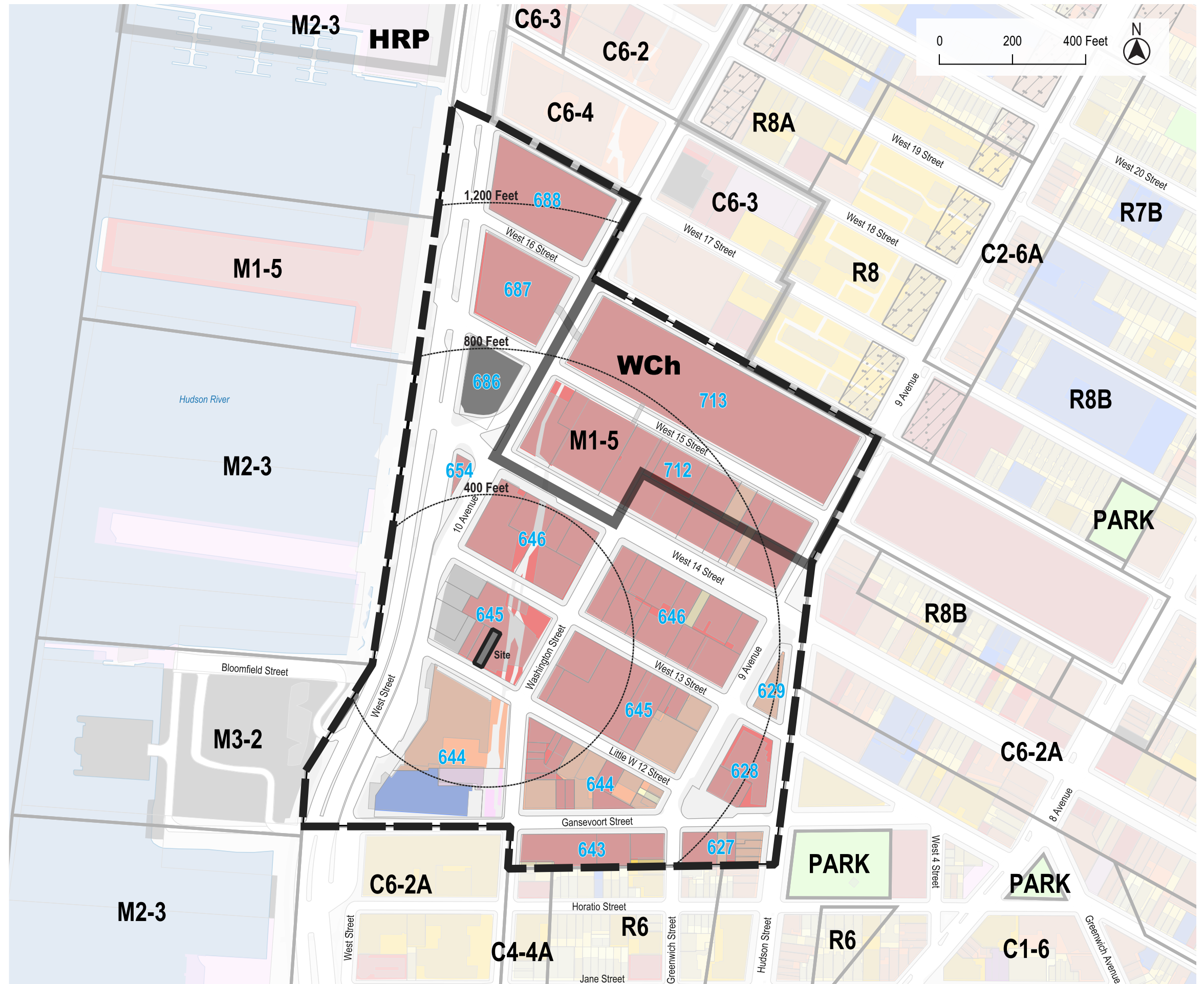
1234 Block Numbers

### Land Uses

-  One & Two Family Residential Buildings
-  Multi-Family Residential Buildings (Walk-up)
-  Multi-Family Residential Buildings (Elevator)
-  Mixed Residential & Commercial Buildings
-  Commercial/Office Buildings
-  Industrial/Manufacturing
-  Transportation/Utility
-  Public Facilities & Institutions
-  Open Space
-  Parking Facilities
-  Vacant Land
-  No Data/Other

### Data Sources:

- Land Use and Building Information: MapPLUTO 2025 v2.1 NYC DCP
- Zoning Districts: NYC DCP, file dated 12/29/2020
- Digital Tax Map: NYC DOF, file dated 1/25/2021
- Building Footprints: NYC DoITT, file dated 1/25/2021
- Street Widths: NYC DCP, Technical Review Division, file dated 1/20/2021








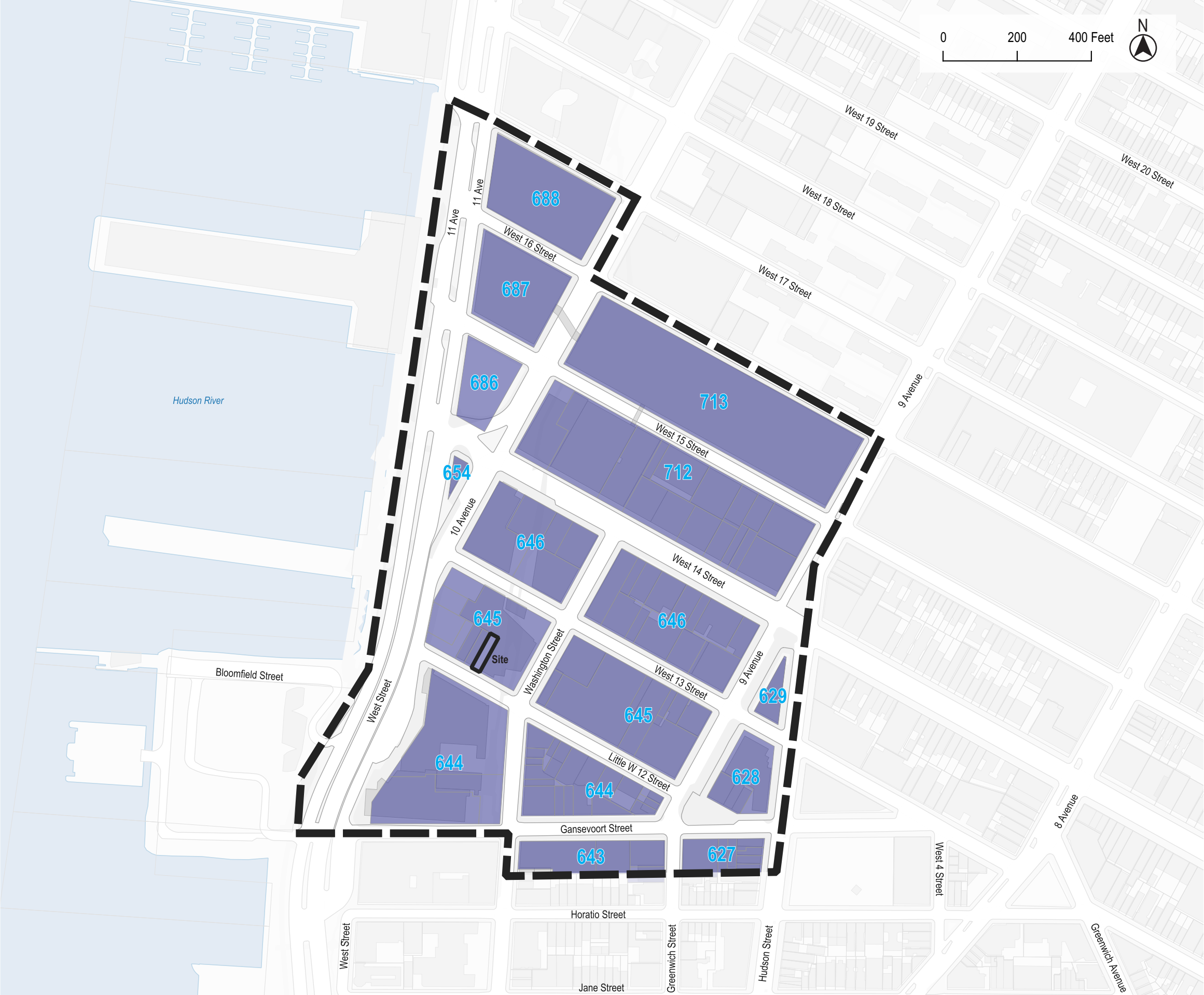
# 51 Little West 12th Street, Manhattan

## Study Area

Block: 645, Lot: 21

### Project Information

-  Study Area (Surrounding M1-5 District)
-  400' Radius from Site
-  Site
-  Block Numbers
-  Lots in the Study Area (86)








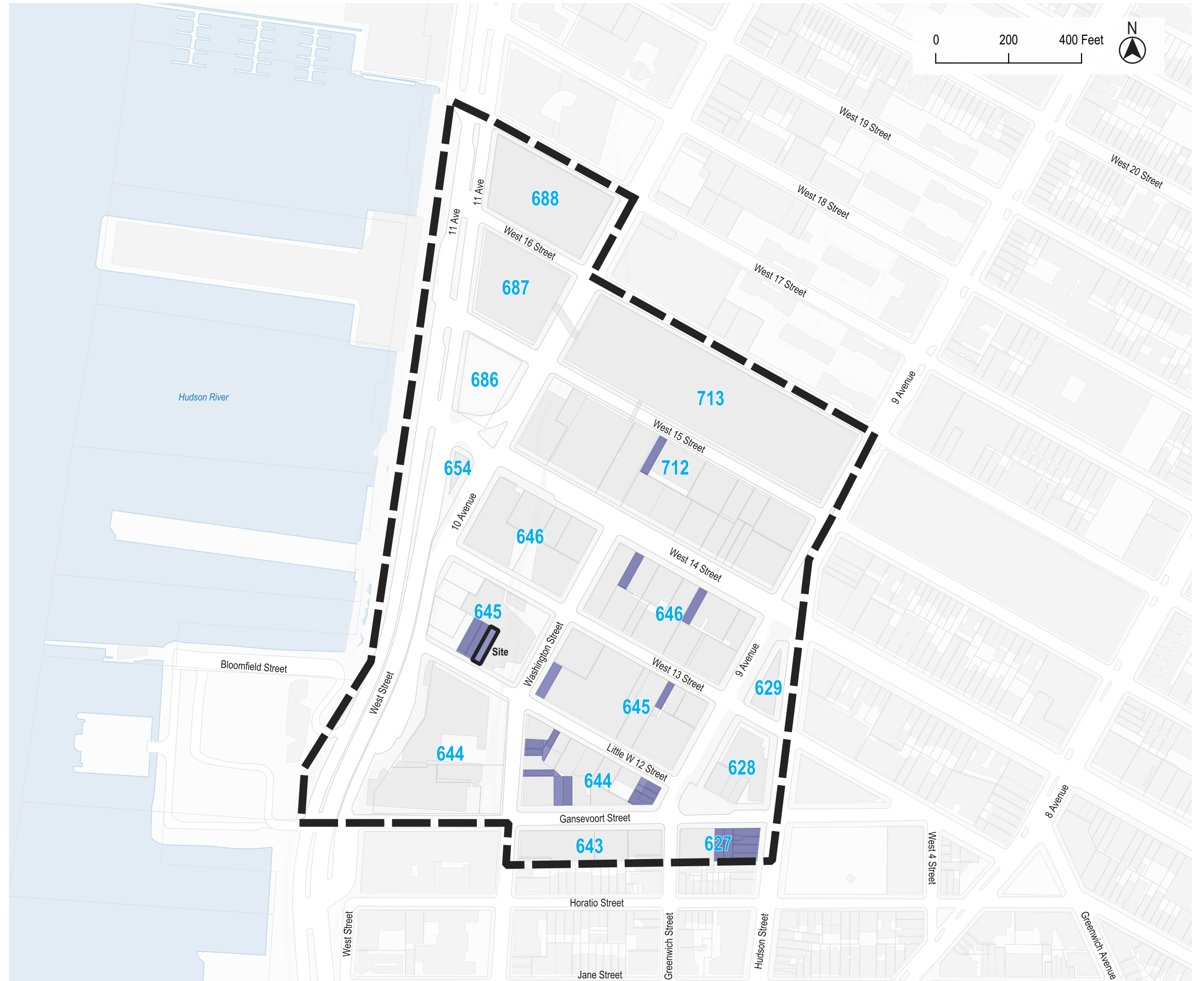
# 51 Little West 12th Street, Manhattan

## Map A: Narrow and Smaller Lots

Block: 645, Lot: 21

### Project Information

-  Study Area (Surrounding M1-5 District)
-  400' Radius from Site
-  Site
-  Block Numbers
-  Lots less than 25' wide and less than 2,600 sf (23)









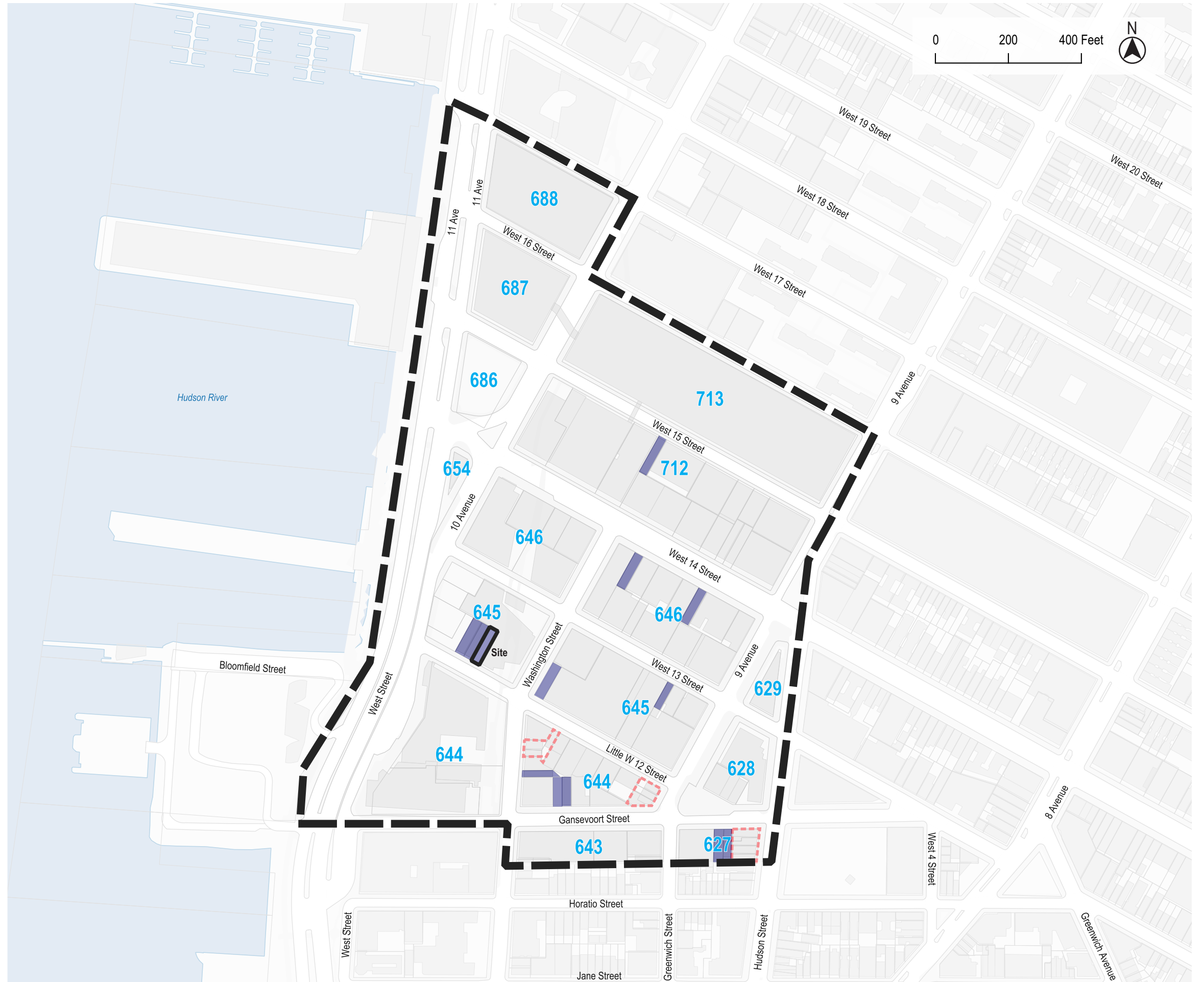
# 51 Little West 12th Street, Manhattan

## Map B: Without Common Ownership

Block: 645, Lot: 21

### Project Information

-  Study Area (Surrounding M1-5 District)
-  400' Radius from Site
-  Site
-  Block Numbers
-  Lots less than 25' wide and less than 2,600 sf without Common Ownership with adjoining property (13)
-  Lots less than 25' wide and less than 2,600 sf under Common Ownership









# 51 Little West 12th Street, Manhattan

## Map C: Non Built-Up Lots

Block: 645, Lot: 21

### Project Information

-  Study Area (Surrounding M1-5 District)
-  400' Radius from Site
-  Site
-  Block Numbers
-  Lots less than 25' wide and less than 2,600 sf without Common Ownership and an FAR < 1.0 (Site Only)
-  Lots less than 25' wide and less than 2,600 sf without Common Ownership with an FAR > 1.0 (identified on previous map)

