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April 7, 2026

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

**Re: BSA Cal. No. 2025-22-BZ
Follow-Up to Neighborhood Character Study for
51 Little West 12th Street, Manhattan (the “Site”)**

Dear Chairwoman Chanda and Commissioners:

This letter follows our neighborhood character study for the above-referenced application, dated October 27, 2025. Specifically, we are writing in response to issues raised in a letter by Zack Winestine of the organization “Save Gansevoort” dated February 19, 2026 (also mentioned by Commissioner Yoon at the previous public hearing of this application on February 24, 2026) which concern the land uses in the area surrounding the subject Site.

Before addressing those specific issues, though, allow us reiterate our conclusion that adding just seven units of residential use to a thriving mixed-use district that contains no actual “manufacturing,” is a change too insignificant to be capable of altering the essential character of this neighborhood.

The Proposed Development Does Not Threaten to Alter The Essential Character of this District.

Notwithstanding the validity of Mr. Winestine’s critiques (which are addressed in great detail below), we maintain and renew our conclusion that the proposed mixed-use development will not alter the essential character of the district in which it is located. Indeed, it would be more accurate to state our conclusion as the proposed development being incapable of registering that type of impact.

To understand why we restate that finding so emphatically, stop for a moment to consider the scale of the project at hand. The proposed development will contain just **seven** residential units. The approval is site-specific, and the property in question measures just 2,581 sq ft in area. In short, the application seeks to permit a very small number of residential units on a single, very small property.

The relevant finding is not whether the use is compatible with the surrounding area (although we think it is given that there's no manufacturing happening in this "manufacturing" district), but rather, whether it would have an existential impact—the words are "alter the essential character"—on the neighborhood. In other words, that if the proposed development were constructed, it would fundamentally change the nature of the Meatpacking District—it would not.

Given the nature of the inquiry, the lens through which we must evaluate the potential impact of the proposed building is holistic in nature: What is the character of the Meatpacking District (or the Gansevoort Market Historic District, if you prefer) as it exists today? And do we believe the introduction of a new building containing seven apartments, threatens to alter that essential character? We respectfully submit that no such threat exists.

The Meatpacking District as it exists today is defined by a lively mix of uses and users; in a word, "activity." We have thousands of people coming and going from the High Line Park. Thousands of people are coming and going from the Whitney Museum. Thousands of people are coming and going from chic hotels like the Standard, the Gansevoort, or the Soho House; as well as from upscale boutiques and stores ranging from Restoration Hardware and the Apple Store, to Rolex and Gucci. These are all set in the backdrop of an increasing population of office workers that has followed new commercial development in the area, and then the tens of thousands of residents in the surrounding neighborhoods (the West Village, and Chelsea) who go to or through this area. All told, we have a bustling 24-hour mixed-use community characterized by people and activity; reminiscent of what Jane Jacobs memorably described as a sidewalk ballet just a few blocks south on Hudson Street.

So, although the neighborhood has a long history of being put to manufacturing use, these days, the word "meatpacking" describes the place, not what happens there. In fact, unless we believe the city's land use data is also inaccurate with respect to identifying industrial and manufacturing uses, as there are **none** for several blocks in every direction. (That the area is even mapped as a manufacturing zoning district is, at best, misaligned with reality.)

The question presented is whether or not the proposed development threatens to alter the essential character of this district. And we respectfully submit that it absolutely does not. The introduction of a single new building containing just seven residential units will not alter the essential character of an active, heavily trafficked 24/7 mixed-use community.

(To say nothing of the city having a desperate need for more housing, and the Site being located in one of the busiest neighborhoods in the entire city.)

Response to Specific Issues Raised

Mr. Winestine appears to be correct in that our neighborhood character study incorrectly classified several buildings as containing residential use where no such use exists. Although what he has actually discovered is something much more profound—that the city's PLUTO data contains land use classifications that are inconsistent with other fields within the same data set. In this case, the city's data classifies buildings as mixed-use residential-commercial even when the same data reports those buildings do not contain any residential units or residential floor area.

That turns out to be a significant issue not only for our Neighborhood Character Study, but for all manner of land use analysis performed by any number of different entities and in any number of different contexts (as explained below). So before going any further, let us provide a correction.

Listed below are the seven properties that Mr. Winestine's letter claimed we improperly classified as containing residential use. And on further review, we believe he is correct, and that the data we relied upon was inaccurate.

- 22 Little West 12th Street -- ZoLa still shows this as "Mixed-Use", but that is believed to be in error. None of the latest certificates of occupancy for the three buildings on the lot show any residential use.
- 817 Washington Street -- ZoLa still shows this as "Mixed-Use", but that is believed to be in error. The latest certificate of occupancy for the building on the lot does not show any residential use.
- 7 Ninth Avenue -- ZoLa still shows this as "Mixed-Use", but that is believed to be in error. The latest certificate of occupancy for the building on the lot does not show any residential use.
- 19 Ninth Avenue -- ZoLa still shows this as "Mixed-Use", but that is believed to be in error. The latest certificate of occupancy for the building on the lot does not show any residential use.
- 21 Ninth Avenue -- ZoLa still shows this as "Mixed-Use", but that is believed to be in error. The bottom floor is used by Sephora, and the upper floors appear used by a restaurant named "Catch" (confirmed by the latest certificate of occupancy).
- 400-404 West 14th Street -- ZoLa shows as commercial (this may have been updated recently).
- 408 West 15th Street -- ZoLa still shows this as "Mixed-Use", but that is believed to be in error. The latest certificate of occupancy for the building on the lot does not show any residential use.

On the question of how the errors that appeared in our study came to pass, the short answer is that to determine the land use of the buildings in the study area, we relied on the land use classifications that appear in city's PLUTO data, which is maintained by the Department of City Planning. These are the classifications that form the basis of the familiar palette of land use colors that we're all accustomed to seeing on land use maps (in land use applications, in environmental review documents, and other planning documents), as well as on websites such as ZoLa or OasisMap.

The specific term used on Page 7 of our study, which was "Buildings Containing Residential Use," is merely a conflation of the several categories of land use that would indicate residential use: One & Two Family Buildings, Multi-Family Walk-Up Buildings, Multi-Family Elevator Buildings, and Mixed Residential & Commercial Buildings.

It's the last category that is the problem. On review it appears that the city is in many instances classifying buildings as mixed **residential**-commercial use when they do not contain any residential units or residential floor area (even the residential unit count and residential floor area are also a part of the same PLUTO data set). In other words, the data

is internally inconsistent. That is the data we relied upon, and that is the source of the errors that appeared in our original study. *(More on that in the closing of this letter.)*

The City's "PLUTO" Data and Land Use Categorization

Given the import of the issues raised, we think it's at least worth explaining the presumed reliability of the methodology employed by our original study.

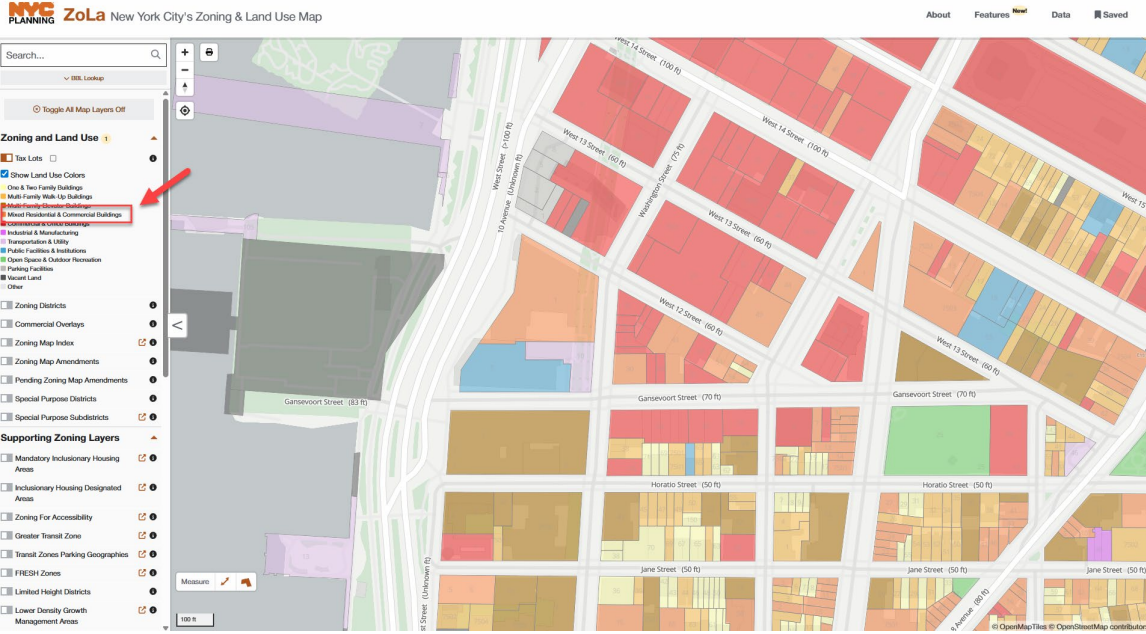
The Primary Land Use Tax Lot Output (or "PLUTO") data is the most extensive data set with respect to land use and zoning that is available in New York City. And to professionals working in zoning, land use, environmental review and related fields in the city, it is an essential resource that is central to much of our work. The practical value of the PLUTO data is that it provides over 70 data fields at the level of every individual property in the city, with mostly complete information (few blanks). These include basic identifying information such as borough, block, and lot; property characteristics such as lot width, lot depth, and lot area; building characteristics such as year built, floor area, and number of units. As well as the specific data at issue here, which is land use categorization.

The PLUTO data contains eleven different categories of land uses described on page 20 in its "data dictionary" as:

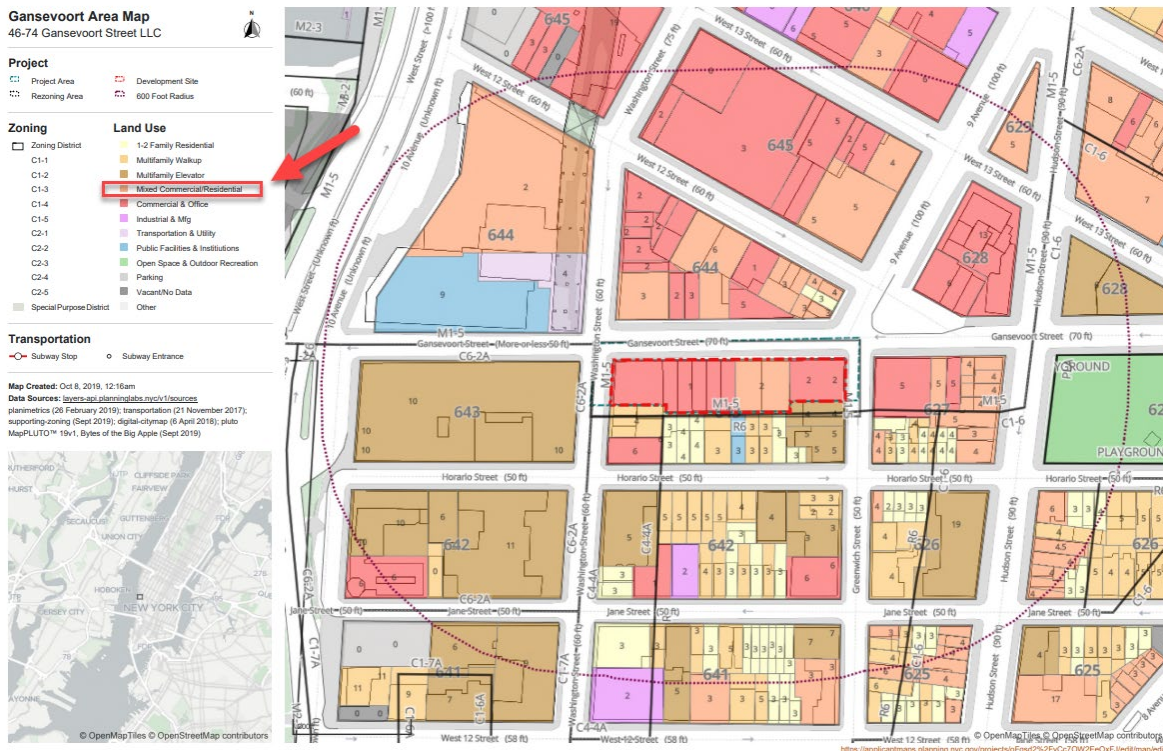
<i>VALUE</i>	<i>DESCRIPTION</i>
01	<i>One & Two Family Buildings</i>
02	<i>Multi-Family Walk-Up Buildings</i>
03	<i>Multi-Family Elevator Buildings</i>
04	<i>Mixed Residential & Commercial Buildings</i>
05	<i>Commercial & Office Buildings</i>
06	<i>Industrial & Manufacturing</i>
07	<i>Transportation & Utility</i>
08	<i>Public Facilities & Institutions</i>
09	<i>Open Space & Outdoor Recreation</i>
10	<i>Parking Facilities</i>
11	<i>Vacant Land</i>

(A full copy of the excerpted text from the Data Dictionary as well as the relevant "Appendix D" of the PLUTO Data Dictionary are attached to this letter.)

To put this in a more familiar context, when you see properties color coded by land use on websites such as the City's "ZoLa New York City's Zoning & Land Use Map," or on maps that may appear in the context of land use applications or environmental review submissions (some of them by our office), all of these and the colors they display are a visualization of the land use categories assigned to properties in the city's PLUTO data. (See examples below.)



Screenshot from “ZoLa” showing the 11 land use categories of the PLUTO data (plus a 12th category “other”), by color, and indicating Mixed Residential & Commercial Buildings



Area Map from City Planning Commission Application No. M 840260 (F), January 22, 2020, identifying the same properties as Mixed Commercial/Residential

Both of the samples above—and we could surely find many more—show the same properties identified in our original study as “containing residential use” classified as mixed-use **residential-commercial** buildings.

Moreover, there's little reason to question the data on its face (particularly when it's produced by the city itself). Consider the two properties/buildings shown in the above profiles from the ZoLa website. Both are identified as mixed **residential-commercial**. The one on the left is known to contain residential use, while the one on the right has been discovered to contain none. Not only are they the same color on the map, but they are both indicated as mixed residential-commercial in their profile. To be sure, the only difference between the two profiles appears lower down in the description of the building, where one breaks out the residential units from the total units, and the other does not.

To continue discussing the inconsistencies in the City's data that have been discovered here is beyond the scope of this submission. Needless to say, we take the issue extremely seriously. For that reason, we have already reached out to the Department of City Planning to initiate a discussion with them about the source and accuracy of their data. And pending the results of that dialogue, we are committed to independently correcting the land use classification data used by our firm such that all maps, studies, and work product moving forward will account for and correct this problem.

Respectfully submitted,

Ian Rasmussen, AICP

- If the unit lots are a mixture of commercial building types, BUILDING CLASS = RC.
- If the unit lots are a mixture of residential building types, BUILDING CLASS = RD.
- If the unit lots are a mixture of commercial and residential building types, BUILDING CLASS = RM.
- If the unit lots are a mixture of commercial and industrial/warehouse building types, BUILDING CLASS = RI.
- If the unit lots are a mixture of commercial, residential, and industrial/warehouse building types, BUILDING CLASS = RX.
- If the unit lots are a mixture of residential and industrial/warehouse building types, BUILDING CLASS = RZ.
- When unit lots with a building class of RG (Indoor Parking), RP (Outdoor Parking), RS (Non-Business Storage Space), or RT (Terraces/Gardens/Cabanos) have the same billing lot as another building class, their building class is ignored. For example, if the billing lot has unit lots with a building class of R4 (Residential Unit in Elevator Bldg) and RG (Indoor Parking), BUILDING CLASS = R4.

Q0 is assigned by DCP to tax lots with a PTS building class starting with “V” that are identified in the NYC GIS Zoning Database as PARK, BALL FIELD, PLAYGROUND, or PUBLIC SPACE.

QG is assigned by DCP to tax lots with a PTS building class starting with “V” that contain community gardens from the Department of Parks and Recreation’s NYC Greenthumb Community Gardens dataset. This is done to comply with Local Law 46 of 2020, which requires that such lots be given a land use category of open space, outdoor recreation, a community garden, or other similar description. Lots with a BUILDING CLASS of QG are assigned to LAND USE CATEGORY “09” (Open Space & Outdoor Recreation). This land use assignment is solely informational and does not confer or change a legal status for such a tax lot.

PTS contains two building classes for some tax lots, with one of the building classes being Z7 (Easement). BUILDING CLASS is only set to Z7 when it is the only PTS building class for the tax lot.

See *Appendix C - Building Class Codes* for valid values

Field Name:	LAND USE CATEGORY (LandUse)
Format:	Alphanumeric - 2 characters
Data Source:	Department of City Planning
Description:	A code for the tax lot's land use category.

The Department of City Planning has created 11 land use categories and assigns each BUILDING CLASS to the most appropriate land use category.

Appendix D - Land Use Categories details the relationship of building classes to land use categories.

VALUE	DESCRIPTION
01	One & Two Family Buildings
02	Multi-Family Walk-Up Buildings
03	Multi-Family Elevator Buildings
04	Mixed Residential & Commercial Buildings
05	Commercial & Office Buildings
06	Industrial & Manufacturing
07	Transportation & Utility
08	Public Facilities & Institutions
09	Open Space & Outdoor Recreation
10	Parking Facilities
11	Vacant Land

Field Name: NUMBER OF EASEMENTS (Easements)

Format: Numeric - 2 digits (99)

Data Source: Department of Finance – Property Tax System (PTS)

Description: The number of unique easements on the tax lot.

PTS contains a record for each easement. NUMBER OF EASEMENTS is calculated by counting the number of unique PTS easement records for the tax lot.

If the number of easements is zero, the tax lot has no easements.

Field Name: TYPE OF OWNERSHIP CODE (OwnerType)

Format: Alphanumeric - 1 character

Data Source: Department of City Planning - City Owned and Leased Properties (COLP)
Department of Finance - Property Tax System (PTS)

Description: A code indicating type of ownership for the tax lot.

Only one data source is used per tax lot.

The COLP file, which contains more accurate and specific type of city ownership data than PTS, is used when data is available for that lot. Codes C, M, O, P are derived from COLP.

APPENDIX D: LAND USE CATEGORIES

DCP LAND USE CODE	DCP LAND USE CATEGORIES	DOF/DCP BUILDING CLASSES
01	One & Two Family Buildings	A*,B*,Z0
02	Multi-Family Walk-Up Buildings	C0,C1,C2,C3,C4,C5,C6,C8,C9, CM, R1,R2,R3,R6
03	Multi-Family Elevator Buildings	D0,D1,D2,D3,D4,D5,D8,D9,H6,H7,R4,RD
04	Mixed Residential & Commercial Buildings	C7,D6,D7,K4,O8,R8,R9,RM,RR,RX,RZ,S*
05	Commercial & Office Buildings	G8,GU,GW,H1,H2,H3,H4,H5,H9,HB,HH,HR,HS,J*,K1,K2,K3,K5,K6, K7,K8,K9,O1,O2,O3,O4,O5,O6,O7,O9,P1,R5,R7,RB,RC,RH,RI,RK,RS
06	Industrial & Manufacturing Buildings	E*,F*,L*,RW
07	Transportation & Utility	G2,G3,G4,G5,G9,T*,U*,Y6,Y7,Y8,Y9
08	Public Facilities & Institutions	H8,I*,M*,N*,P2,P3,P5,P7,P8,P9,RA,W*,Y1,Y2, Y3,Y4,Z1,Z3,Z4,Z5
09	Open Space & Outdoor Recreation	P4,P6,Q*,Z8
10	Parking Facilities	G0,G1,G6,G7,RG,RP,Z2
11	Vacant Land	V*

NOTES: * Denotes all DOF/DCP Building Class classifications within an alphabetic grouping. The Building Classes R0, Y5, Z7, and Z9 are not assigned to a Land Use Category.