

CITY OF NEW YORK
MANHATTAN COMMUNITY BOARD FOUR

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Chair

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District Manager

January 19, 2023

Barbara Blair, President
Garment District Alliance
209 W. 38th Street, 2nd Floor
New York, NY 10018

**Re: Special Garment Center District (NYC ZR 121-00)
Proposed Zoning Text Amendment Concept
to Allow Residential Use**

Dear Ms. Blair,

On December 14, 2022, the Garment District Alliance presented a proposed Zoning Text Amendment Concept to allow conversion of commercial space into residential use within the Special Garment Center District (SGCD) to Manhattan Community Board 4's (MCB4) Clinton/Hell's Kitchen Land Use Committee. MCB4 has a long-standing track record of working alongside interested parties to improve the housing availability throughout our District and it is with great interest to know that the Garment District Alliance is exploring various options to increase the number of available housing units, both affordable and market rate, in Midtown Manhattan.

At its Full Board meeting on January 4, 2023, by a vote of 44 in favor, 0 opposed, 0 abstaining, and 0 present but not eligible, MCB4 recommended that any proposed Zoning Text Amendment allowing Residential Use in the Special Garment Center District must address the following concerns, land use and housing policy issues:

a) Affordable Housing

Residential conversions of Garment Center loft buildings or hotels should be as of right, but subject to a version of section 23-90, Inclusionary Housing, to ensure an affordable housing component in all such conversions. Inclusionary Housing should produce a range of affordability from 60% to 165% as permitted in NYC ZR 23-90 & 23-154

b) Hotel Conversions to Housing

To permit successful conversions of hotels to housing, the Alliance may need to study and propose zoning text to modify zoning requirements on apartment size, minimum room size or other lot area requirements for a building with dwelling units.

c) Mixed Use and Live/Work

Mixed Use Conversions should also be permitted to allow conversions of upper floors of the typical “Wedding Cake” loft building with multiple setbacks, providing light and air to new apartments while maintaining lower floors with large floor plates, without adequate light and air, for commercial or alternatively live/work quarters.

d) No change to Existing FAR Regulations

Existing Floor Area Ratios (FAR) must be maintained and no upzoning allowed. In fact, many Garment Center loft buildings are overbuilt to existing FAR limits, providing an incentive to retain existing structures.

e) Height and Setback Requirements to Ensure and Reinforce Garment Center Built Context

In 2005, during the Hudson Yards rezoning, Subarea A of the SGCD was rezoned to greater bulk and permitted residential use. As part of that rezoning, MCB4 requested and achieved height and setback requirements in that Subarea. Those contextual requirements ensured both redevelopment and new development on soft sites would maintain streetwalls, set minimum and maximum base heights and require setbacks both to respect the historic Garment Center loft building type and preserve light and air on those densely built blocks. A modified version of those regulations, consistent with existing height limits on different midblocks and avenues should be studied and incorporated into any proposed zoning text.

f) Incentivizing Conversion not Demolition

Demolition in Subarea A, other than residential demolition, which has been conducted illegally, has been mostly of one to three story garages. One exception has been a 30-foot wide, 16-story Gothic Revival loft building on West 39th Street between Ninth and Tenth Avenues. That site was redeveloped as a budget hotel. Text provisions must be studied and proposed to incentivize renovation and conversion, not demolition, of large square footage properties.

g) Managing Building Services within the Building Envelope

The development of hotels throughout MCD4 has created serious issues in managing building services, such as package delivery, laundry, and trash removal and recycling. Instead of providing for those services within the building’s ground floor, they are performed on the sidewalk. Given the narrow sidewalks on the midblocks in the Garment Center, those services have created pedestrian conflicts. Text provisions must be studied and proposed to require adequate room for building services to be located within the converted buildings.

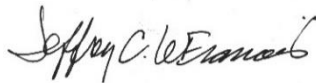
MCB4 also requests additional information to further understand current land uses and residential development opportunities within the Special Garment Center District, specifically:

- a map of all residential buildings and hotels
- a map of soft sites with buildings below density that current zoning allows
- a map of overbuilt buildings in which density exceeds current zoning allowances
- the current residential vacancy rate

The concept of introducing a Zoning Text Amendment to allow conversion of commercial space to residential within the Special Garment Center District is a creative approach to building much-needed housing on the west side of Manhattan. We urge you to undertake extensive public outreach as well as ongoing discussion with the Alliance's property owner membership. We look forward to working in partnership with you, and with Manhattan Community Board 5, to ensure that any Zoning Text Amendment for conversion of space is mindful of our community's issues.

We look forward to meeting with you again as your outreach and plans proceed.

Sincerely,



Jeffrey LeFrancois
Chair
Manhattan Community Board



Jean Daniel Noland
Co-Chair
Clinton/Hell's Kitchen Land Use Committee



Paul Devlin
Co-Chair
Clinton/Hell's Kitchen Land Use Committee

Cc: Hon. Erik Bottcher, NYC Council Member
Vikki Barbero, Chair, Manhattan Community Board 5
Daniel Gorodnik, Chair, NYC Department of City Planning