



CITY OF NEW YORK

MANHATTAN COMMUNITY BOARD No. 4

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J. LEE COMPTON
Chair

May 23, 2006

Robert Dobruskin
Director, Environmental Assessment and review Division
New York City Department of City Planning
22 Reade Street, 4E
New York, NY 10007

Re: Scope of Draft Supplemental Environmental Impact Statement for proposed First Avenue Properties Rezoning, CEQR Number 06DCP039M

Dear Mr. Dobruskin:

At its meeting on May 10, 2006, the Clinton/Hell's Kitchen Land Use Committee of Manhattan Community Board No. 4 approved the following comments on the scope of Draft Supplemental Environmental Impact Statement (DSEIS) for proposed First Avenue Properties Rezoning. These comments are subject to ratification by the full Board at its next meeting on June 7, 2006, but are being submitted today in order to meet the May 26 deadline for comments.

Manhattan Community Board No. 6's Zoning Proposal must be comprehensively evaluated as an alternative to the proposed action.

Land use planning is one of the main responsibilities allocated to Community Boards by the New York City Charter. Taking this responsibility seriously, Manhattan CB6 has spent years studying how development along its East River waterfront should be shaped. Its vision for the area is reflected in its 197-a Plan and, more specifically, in its Zoning Proposal, or 197-c Plan, for the First Avenue Properties formerly owned by Consolidated Edison.

We applaud CB6 for the enormous effort reflected in these plans, and for their commitment to community-based planning. Based on our own experience with the recent Hudson Yards and West Chelsea rezonings, as well as the adoption in 1996 of our Chelsea 197-a Plan, we fully appreciate the broad effort that is required to bring a community together to articulate a constructive vision for development and then to follow through with City agencies, property owners and other stakeholders to implement that vision.

Community-based planning of this scope and quality must be given serious consideration. We therefore are pleased to join CB6 and the Manhattan Borough President in insisting that CB6's Zoning Proposal be comprehensively evaluated in the DSEIS as an alternative to the proposed First Avenue Properties Rezoning.

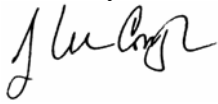
The proposed zoning text amendments should be limited in scope.

We are particularly concerned that the proposed action includes zoning text amendments that are generally described but not defined in the Environmental Assessment Statement, and that will be applicable beyond the First Avenue Properties project area, including in Community District 4. These text amendments apparently would apply in C5 and C6 zoning districts for developments of at least 5 acres. CD4 includes many C5 and C6 zoning districts, as well as M2-3 zoning districts along the Hudson River waterfront between 22nd and 41st Streets where a rezoning to C6 is possible. Within these districts are several potential development sites of 5 acres or more.

We find it impossible to comment thoroughly on the proposed text amendments without knowing what they are.

In most of CD4, special district regulations have been carefully crafted to provide for future development. This planning should not be upset by a text amendment whose only desired application is in the First Avenue Properties project area. The proposed text amendments should be limited in scope so they apply in the narrowest possible area, such as in Community District 6, or even more narrowly. If the amendments are not so limited, the DSEIS must identify and evaluate all potential development sites within CD4 for which the amendments would be applicable, including all areas now zoned M2-3.

Sincerely,



J. Lee Compton
Chair
Manhattan Community Board No. 4



Anna Hayes Levin
Co-Chair
Clinton/Hell's Kitchen Land Use Committee



Simone Sindin
Co-Chair
Clinton/Hell's Kitchen Land Use Committee

cc: Local elected officials
Toni Carlina, District Manager, CB6