



CITY OF NEW YORK

**MANHATTAN COMMUNITY BOARD FOUR**

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**Delores Rubin**  
Chair

**Jesse Bodine**  
District Manager

Rick Chandler  
Commissioner  
NYC Department of Buildings  
280 Broadway  
New York, NY 10007

January 9, 2016

**Re: Christ Church—Façade Preservation  
334-346 West 36<sup>th</sup> Street**

Dear Commissioner Chandler:

Manhattan Community Board 4 (MCB4), which has been engaged with the development of 334-344 West 36<sup>th</sup> Street, located in the Special Garment Center District (SGCD), would like to write to you to express our disappointment that the preservation of the complete original church façade could not be approved by the Department of Buildings (DOB). MCB4 recognizes and appreciates DOB's responsiveness to the board's April 7<sup>th</sup>, 2016 request to require the hotels in the district to meet the street wall requirements stated in the Zoning Resolution (ZR). However, MCB4 believes the owners of 334-336 West 36<sup>th</sup> Street willingness to integrate the historic church's chapel facade into the development fulfills the intent of the Zoning and warranted an exception. MCB4 hopes that going forward, more effective communication can take place to preserve the historically important built environment.

**Background**

Christ Church was constructed in 1905 and was erected as a memorial to Reverend Doctor Maltible D. Babcock, who was the pastor of the Brick Presbyterian Church. Its construction was distinct from that of similar structures in that it included a six bay nave section that ran parallel to the street as opposed to perpendicular. The nave section of the building, which was located on the eastern end, was two stories tall. A four story tower was located on the western end of the building.

In 2004, Christ Church was identified as a historic resource in the Hudson Yards Environmental Impact Statement (EIS) and was deemed to be eligible for inclusion in the State and National Register of Historic Places.

In 2014, developer Sam Chang purchased the site of Christ Church with the intention of building a 20 story hotel on the site. The MCB4 sought to preserve as much of the historic structure as possible and engaged with the developer once it learned of the church's proposed demolition.

### **Efforts to Preserve Church**

MCB4 had a series of meetings with owner/developer Sam Chang in 2015 and 2016. MCB4 clearly stated its preference for incorporating as many elements of the church building into the new building's design. Mr. Chang was flexible and stated he was willing to work with MCB4 to arrive at a compromise.

In June 2015, the owner presented plans for the new hotel that incorporated the church's façade as well as elements of the parish house into the design of the new hotel. Although the interior of the church would be demolished, from the street level, the block would retain the historic façade that had stood there for 111 years. He then filed those changes with the Department of Buildings (DOB).

Multiple plans reviews with DOB were held along with several appointments with the Manhattan Borough Commissioner. Throughout the entire process, DOB indicated receptivity to the proposal. The hotel proceeded in construction with the main part of the façade preserved, awaiting final approval.

During the same period of time, MCB4 had engaged with DOB regarding other hotel development sites in the SGCD to ensure compliance with streetwall requirements. Shortly after, it received a joint response from the commissioners of DOB and the Chair of the City Planning Commission, stating the Board's concerns about streetwall compliance were correct and all development sites noted in that letter would be required to comply with streetwall requirements<sup>1</sup>.

After more plans reviews and inquiries from elected officials, the Borough Commissioner assured MCB4 that the façade preservation plan was moving to final approval. Two months later, MCB4 was informed by the developer that the façade preservation was being questioned by DOB Technical Review. Both MCB4 and Council Member Corey Johnson's office wrote letters of support for Mr. Chang's preservation plan. Per the board's request, Council Member Johnson and Borough President Gale A. Brewer pursued a meeting with DOB and the developer. DOB responded immediately and at the meeting the applicant was informed that the preservation of the original façade would not be compliant, but rather only the ground floor portion of the wall.

Due to Mr. Chang's willingness to follow through with his vision, he agreed to recreate the 2<sup>nd</sup> and 3<sup>rd</sup> story portions of the wall on top of the original first story portion which both fulfills DOB's reading of the zoning and allows a semblance of the church wall to continue to exist.

### **Special Garment Center District and Street Wall Requirements**

In 2016, DOB, citing zoning restrictions, required developer Sam Chang to demolish the church façade. DOB cited that the 6-foot setback at the second story (in place for 110 years), was not compliant with street wall requirements in Section P-2 of the Special Garment Center District, where buildings are required to rise 80 feet before having a setback, per section 121-32 of the Zoning Resolution:

Height of Street Walls and Maximum Building Height  
(a) Height of #street walls#

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<sup>1</sup> Letter dated from DOB & DCP regarding streetwall zoning requirements & intent in SGCD

The #street wall# of any #building# shall be located on the #street line# and extend along the entire #street# frontage of the #zoning lot# not occupied by existing #buildings# to remain. Such #street wall# shall rise without setback to a minimum base height of 80 feet and a maximum base height of 90 feet. However, if the height of an adjacent #street wall# fronting on the same #street line# is higher than 90 feet before setback, the #street wall# of the new or #enlarged building# may rise without setback to the height of such adjacent #street wall#, up to a maximum height of 120 feet. For #zoning lots#, or portions thereof, with #street# frontage of 25 feet or less and existing on June 29, 2010, a minimum base height lower than 80 feet shall be permitted along such #street# frontage

This zoning text was created in order to ensure that any new development within the SGCD, which includes many bulky manufacturing buildings, would conform to surrounding high streetwall historic buildings as noted in the Board's letter of April 7<sup>th</sup>, 2016. **MCB4 is disappointed that such a regulation, which was written specifically with the intent to preserve the character of the Special Garment Center District, would instead be invoked to require an existing historic structure be removed in that same district.**

#### **Conclusion**

MCB4 has worked for decades with numerous city agencies, including DOB, to preserve the fabric of our neighborhoods, Chelsea & Clinton/Hell's Kitchen. MCB4 and a well-known and prolific hotel developer worked to arrive at a mutual compromise to preserve the street wall and the historic fabric, while balancing the need for new commercial hotel development. MCB4 believes that such efforts should be applauded and for the future would be more aptly supported by the agency.

Sincerely,



Delores Rubin  
Board Chair



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

cc: Hon. Brad Hoylman, Senator  
Hon. Richard Gottfried, Assembly Member  
Hon. Gale Brewer, Manhattan Borough President  
Hon. Corey Johnson, Councilmember  
Commissioner Vicky Been, HPD  
Deborah Rand, HPD  
Manhattan Borough Commissioner Martin Rebolz, DOB