



CITY OF NEW YORK

MANHATTAN COMMUNITY BOARD FOUR

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DELORES RUBIN
Chair

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District Manager

May 4, 2017

Marisa Lago, Chair
New York City Planning Commission
120 Broadway
31st Floor
New York, NY 10271

RE: Proposed Planning Framework for Manhattan Block 675

Dear Chair Lago:

Manhattan CB4 (CB4) is pleased that the Department of City Planning (DCP) is proposing a Planning Framework for the development of Block 675, and that the Chelsea Land Use Committee had the opportunity to discuss the proposed Framework at its April 17th, 2017 meeting. We support many of the proposed features of the Framework but disagree with some important assumptions and elements of the proposal.

Background

CB4 has long sought the inclusion of Block 675 (West 29th to 30th Streets, Eleventh to Twelfth Avenues) and the blocks immediately to the south in the Special West Chelsea District (SWCD). DCP has consistently declined to do so, beginning with the original boundaries of the SWCD and continuing through two expansions of the district. In 2016, DCP met with members of CB4 to discuss their plans for a Planning Framework for Block 675 rather than a rezoning incorporating it into the SWCD.

Because three developers intend to develop three different parcels on Block 675, a policy for the coordinated development of the entire block is essential. More than guidelines, the policy specifies uses, massing and density. We understand that each individual developer will need to submit an application for zoning map changes that will go through the ULURP process which includes public review, and that an Environmental Impact Statement (EIS) will be required.

The Framework identifies five zoning mechanisms that would be used for developing Block 675:

- A text amendment allowing new granting and receiving sites in the Special Hudson River Park District; Piers 59, 60 and 61 have been identified as granting sites; Block 675 would be the receiving site;
- A map amendment replacing the existing zoning districts with a new zoning district;

- A special permit for the transfer of Hudson River Park development rights;
- A City Planning Commission Chair certification providing for monitoring of payment obligations; and
- A text amendment identifying the area for Mandatory Inclusionary Housing (MIH).

Framework Elements CB4 Supports

CB4 supports the following elements of the proposed Framework:

- Changing the existing manufacturing districts (M1-6 and M2-3) to districts which would permit a mix of residential and commercial uses. Block 675 is situated immediately west of the SWCD which permits these uses, and immediately south of the Special Hudson Yards District which also allows those uses.
- Transferring development rights (TDR) from the Hudson River Park (HRP) will help fund the park's maintenance and development. CB4 wholeheartedly supports HRP improvements. The park is a much-used, treasured amenity in Community District 4 (CD4).
- The generation of affordable housing through MIH. The Board has a long history of supporting affordable housing in CD4.
- The proposed zoning in the Framework for the eastern half of the block, which would have a base FAR of 10.0 with MIH and up to a 20 % bonus from HRP TDRs (2 FAR) for a total FAR of 12.0.

We also support a number of urban design measures:

- Activating the streetscape along West 30th Street Eleventh Avenue by requiring transparency and retail uses on the ground, second and third floors. People on the High Line would be able to view activity in the new buildings;
- Accommodating public facilities and infrastructure needs on West 29th Street;
- Requiring street walls of varying heights on three sides of the block (Eleventh Avenue, West 30th Street and Twelfth Avenue); and
- Including measures to allow views of the river and the city from the block just north of Block 675.

CB4 Concerns

Density and Building Heights

DCP speaks of Block 675 as a “transitional” area – from the very tall Hudson Yards buildings to the north to the lower scale West Chelsea buildings. However, the proposed Framework does not include height limits, which CB4 believes is a serious mistake because building heights are crucial in defining the character of a neighborhood.

Buildings in the adjacent Subarea A of the SWCD are limited to 450 feet. In contrast, 30 Hudson Yards on the Eastern Rail Yards will be 1,296 feet when it is completed. We accept that the buildings on Block 675 will be larger than those permitted in Subarea A, but we do not believe it is appropriate to extend the

massive building sizes and heights of the Rail Yards to Block 675 as both DCP and the block's developers propose.

We do not take Hudson Yards as the reference point for building heights on Block 675; instead, we view the block as relating more to the West Chelsea neighborhood. The permitted building heights on Block 675 should be much closer to 450 feet than to 1,300 feet.

We disagree with DCP's assumption that the western part of Block 675 nearest the river should accommodate the highest buildings. CB4 prioritizes views of the waterfront for the public and the nearby neighborhood. In order to preserve the sense of openness, we do not support exceptionally tall buildings close to the waterfront.

The DCP Framework currently does not specify FARs for the western portion of the block. DCP aims to allow for "flexibility" and for the need to accommodate the Hudson River Tunnel ventilation building. The Framework includes a floor area exemption for the ventilation building, but a specific number has not been identified. It would be useful to specify this exemption in the Framework. CB4 hopes to work with DCP on the siting and design of the ventilation shaft.

CB4 opposes a base FAR of 12.0 (with MIH), plus a 20 % increase from HRP TDRs and another 20 % increase for a Public Space Bonus, resulting in a total FAR of 16.8 for the western portion of the block. DCP appeared to say at the Chelsea Land Use Committee meeting that the Public Space Bonus was not in the proposed Framework; this needs to be clarified. CB4 opposes the inclusion of a Public Space Bonus in the Framework.

CB4 recommends that DCP adopt an approach to zoning that lowers the base FAR as was done in Hudson Yards. Additional bonuses would then be less likely to result in massive buildings.

Affordable Housing

Mandatory Inclusionary Housing (MIH) will require that 20 % of the new housing units be affordable housing for lower income people. CB4 asks that another 10 % of the residential units be affordable housing, for a total of 30%, available for moderate/middle income people who urgently need housing at reasonable rents. CB4 has consistently advocated for 30% affordable units accommodating people with widely varying incomes to maintain the vitality of the district.

Street Wall Heights

Three different street wall heights are proposed in the Framework:

- 85 to 90 feet along 11th Avenue;
- 45 to 85 feet along eastern portion of West 30th Street; and
- 25 to 45 feet along 12th Avenue and western portion of West 30th Street.

CB4 favors higher street walls because bulk can be shifted from the upper portion of a building to lower stories, resulting in buildings with less height but the same floor area. For example the street wall on a West 30th Street building in Hudson Yards is 130 feet.

Community facilities, Services and Infrastructure

CB4 recommends that DCP be proactive by including requirements in the Framework for community facilities, services and infrastructure. We acknowledge that these topics will be discussed in an EIS when

an application is submitted but we believe that unless such services are required ahead of time, it is unlikely that they will be included in the new development.

We are concerned about the need for:

- Schools;
- Emergency Medical Service (EMS) facility (which should be relocated from its current West 23rd Street site);
- Local emergency health facility; and
- Sewage, utilities, electricity.

Parking

CB4 recommends that the Framework remove the existing special permit for additional parking spaces. If the Framework is silent on this topic the current parking regulations under ZR 13-45 and ZR 13-451 would govern. CD4 has the third worst air pollution in New York City. We have found that in West Chelsea most developers of residential buildings have been successful in obtaining permission for additional spaces through a special permit. CB4, as stated in a number of letters to CPC and voiced in meetings with DCP, believes that the test determining eligibility for the special permit is deeply flawed and inapplicable in West Chelsea. We seek to limit additional vehicular traffic from our district to improve air quality.

We look forward to working with DCP on planning for Block 675 and are excited about the opportunity we have to help create a vibrant, attractive block in West Chelsea.

Sincerely,



Delores Rubin
Chair
Manhattan Community Board 4



John Lee Compton, Co-Chair
Chelsea Land Use Committee



Betty Mackintosh, Co-Chair
Chelsea Land Use Committee

cc: Hon. Gale A. Brewer, Manhattan Borough President
Hon. Corey Johnson, City Council
Hon. Brad Hoylman, State Senate
Hon. Richard Gottfried, State Assembly
Edith Hsu-Chen, Manhattan Director, Department of City Planning
Madelyn Wils, President & CEO, Hudson Park Trust
Jeremy Colandgelo-Bryan, NJ Transit