

7 June 2004

Hon. Amanda Burden, Chair
City Planning Commission
City of New York
22 Reade Street
New York, New York 10036

Dear Commissioner Burden:

The New York Chapter of the American Institute of Architects strongly supports the Ladies Mile rezoning project. We have reviewed the rezoning area and proposed intent of the rezoning and note the following:

- The shift from M1-6M Manufacturing to C6-4A will facilitate new residential construction and conversion as of right;
- It will recognize the changes that have occurred in the subject area, which has seen a shift to mixed use commercial and residential from manufacturing; and
- It will reinforce the objectives of the Ladies' Mile Historic District, which covers almost the entire proposed rezoning area.

This statement of support for the proposal for rezoning was reviewed and accepted by the policy board of the AIA New York Chapter, on behalf of our 3,700 members. We agree that the changes as proposed to the district will facilitate quality development and appropriate land use.

Specifically, we note in our review that:

- the undeveloped parking lot areas in the proposed zone are an underutilized resource which could contribute to needed residential and mixed use development. The parking itself on lots proposed for development will be replaced in new facilities. The larger in balance between supply and demand for parking is not restricted to this area and should be addressed as a borough wide problem with solutions that will take into account air quality, transit availability and alternative solutions for zoning or public action to increase supply as appropriate.
- the proposed changes to bulk regulations will prevent development of towers and plazas which are out of scale with the neighborhood and substitute development of buildings with street walls and building

envelopes in keeping with the context of the neighborhood. For sites within the Ladies' Mile Historic District, proposed buildings would continue to require a Certificate of Appropriateness from the Landmarks Preservation Commission.

- the proposed bonus from 10 to 12 FAR for inclusionary housing is an important incentive for affordable housing. Additional city wide programs for encouraging affordable housing are supported by the AIA but are beyond the scope of this rezoning.
- a requirement for continuation of a special permit procedure for nightclubs will be an important component in ensuring public and community control over such uses, which if not properly regulated can have a negative impact on the quality of life in urban residential neighborhoods.

To conclude, helping to preserve the character and integrity of this area of the Ladies' Mile Historic District will be facilitated by this proposed rezoning.

Yours truly,

Mark Ginsberg, AIA
President

Fredric Bell, FAIA
Executive Director