



September 9, 2009

Amanda M. Burden, Chair
New York City Planning Commission
22 Reade Street
New York, New York 10007

Dear Chair Burden:

Citizens Housing and Planning Council (CHPC) has reviewed the Department of Housing Preservation and Development (HPD)'s Draft Environmental Impact Statement, pursuant to which HPD has proposed a text amendment to the Zoning Resolution of the City of New York to extend the Inclusionary Housing Program to proposed R6A and R7A districts, an amendment to the Zoning Map, Section No. 13b, an application for the First Amended Broadway Triangle Renewal Plan, and an application for designation of certain property as an Urban Development Action Area and for disposition of such property. CHPC is very grateful to Shampa Chanda, Assistant Commissioner for the Division of Planning and Environmental at HPD, who attended a meeting of CHPC's Zoning Committee, cogently presented the details of the proposed project, and discussed the proposal directly with committee members.

CHPC enthusiastically supports the Broadway Triangle rezoning proposed by HPD. We applaud the efforts of both HPD and the Department of City Planning (DCP) to revitalize and redevelop the Broadway Triangle area by encouraging the development of affordable housing, commercial and community facility space. Developers have already applied for funding to develop housing on the proposed city-owned sites, a step which suggests that this urban renewal project has great potential for success. We are pleased that a critical component of the character of the area, the existing street grid, is maintained under the proposed plan. HPD and DCP should be commended for rethinking the underlying objectives of the 1989 urban renewal plan for Broadway Triangle, incorporating the land use changes in the surrounding blocks, and creating an updated land use plan that reflects the future of the area rather than its past. CHPC does, however, have reservations about a few aspects of the project, as follows:

1. **Density.** The Broadway Triangle area, which is served by four subway stops and is not located within an existing low-density low-rise residential neighborhood, appears to us to be an ideal location for high-density development. Thus, we find it unfortunate that the rezoning does not reflect DCP's priority of transit-oriented density and provide for a higher density rezoning, particularly at the subway locations. We understand that DCP and HPD necessarily balanced competing and vocal interests in drafting a plan to rezone from primarily manufacturing uses to R6A and R7A. However, we believe that higher density districts at the subway stops and the proposed rezoning in the remainder of the

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Broadway Triangle would have balanced downzonings elsewhere in the community district and would have been an appropriate sustainable planning response to transportation infrastructure opportunities and development pressures. For instance, a greater FAR would support the costs of environmental remediation on the contaminated sites that are designated for substantially affordable housing. In addition, a greater FAR would increase the number of potential inclusionary units on the northern, privately-owned sites, increasing their financial feasibility to affordable housing developers.

2. Small Business. We are concerned about the future of the small businesses located on property that is designated for city acquisition. Such small businesses are the lifeblood of this city. We are troubled by government actions that unnecessarily jeopardize their economic well-being, even to achieve the laudable goal of encouraging affordable housing development. The midblocks occupied by these small businesses appear to be suited to mixed use development that would permit these small businesses to continue to co-exist with residences. Thus, we are disappointed that the rezoning does not provide for a Special Mixed Use District (i.e., MX) designation so as to allow businesses to continue operation. Barring an MX designation, we urge HPD and the Economic Development Corporation (EDC) to ensure a successful relocation for the small businesses affected by condemnation. EDC should strive for a streamlined relocation that places the affected businesses at a location as close as possible to their original home.
3. Pfizer. From a planning perspective, we feel that it would have been preferable to include the Pfizer sites (consisting of the superblock south of Flushing Avenue and the three blocks north of Flushing Avenue, all located to the southwest of the rezoning area) in this rezoning. The original 1989 urban renewal plan for the Broadway Triangle site included most of the Pfizer sites in its rezoning scheme. A future rezoning of the Pfizer sites is inevitable, so it is unfortunate that such significant parcels are excluded from the proposed rezoning. We understand the potential difficulties of dealing with a major corporation that is a landowner but not a developer. However, the ownership of underutilized land should not limit the public's need to examine neighborhoods in a comprehensive fashion. The existing Pfizer plant has the capacity to be the locus of an economic renaissance in the area, in that small businesses could potentially be relocated to the plant building. Including the Pfizer sites in the rezoning would have been an ideal mechanism to spur economic growth in the neighborhood.

CHPC would like to reiterate its support for the proposed rezoning and revised urban renewal plan for the Broadway Triangle area. Our comments do not mean that we believe that the proposed rezoning before you should not proceed. Rather, the balance of the area should be rezoned so as to reinforce the City's land use goals for the area, whenever redevelopment should occur. This plan will provide sorely needed affordable housing stock for the city and revitalize an industrial wasteland in an area with great economic potential, and CHPC enthusiastically supports it. We thank you for taking the time to consider our opinion on this matter and are, as always, available to discuss this matter further.

Sincerely,



Jerilyn Perine