



**New York City Council Subcommittee on Zoning and Franchises  
Hearing on Greater East Midtown Rezoning Plan  
June 27, 2017  
Lynn Kelly, Executive Director**

New Yorkers for Parks is the city's independent research-based advocacy organization championing quality parks for all New Yorkers. We write to the Council today with regard to the Greater East Midtown Rezoning and its potential impact on Greenacre Park.

As you know, Greenacre Park provides much-needed open space in this densely built and populated part of Manhattan. Our 2015 City Council District Profiles examined the provision of open space throughout the City, finding that Council District 4, which Greenacre Park falls within, has extremely little open space. Only 2% of District 4's area is parkland, giving the district the third-lowest ranking for acres of parks & playgrounds per capita in the entire city.

Greenacre Park is a special case. Founded privately in 1971 and owned and operated by the independent charity, the Greenacre Foundation, Greenacre Park adds invaluable open space to a neighborhood that is starved for it. Its careful design, keen maintenance, and frequent cleaning makes it a ready refuge for working New Yorkers, local neighbors, and visitors alike.

New Yorkers for Parks is concerned about the impacts that may occur on Greenacre Park's access to sunlight if the Greater East Midtown Rezoning passes as proposed. We seek a considered balance throughout the city between development to grow our city, and preservation of open spaces, to serve those who work and live here. Sunlight is a vital resource for our city's open spaces that must be safeguarded to the best of our ability to compromise between the appetite for development and the desire to form liveable neighborhoods.

New Yorkers for Parks urges the Committee on Land Use, and the Subcommittee on Zoning and Franchises to work with the City Planning Commission to modify the Rezoning so as to protect access to the natural resource of sunlight for Greenacre Park, a critical open space in an incredibly park-poor part of the city. There are several ways to achieve this goal:

- Limit heights on Projected Development Sites 7, 10, 11, and on Potential Development Sites C, D, and J. While still allowing an increase from current as-of-right development potential,

restricting heights on these sites to those at which a building would cast a 20-minute shadow on Greenacre Park will minimize shadow impacts to this open space.

- Create a mechanism for further review of shadow impacts on a site-by-site basis, triggered by building application submissions.
- Amend the rezoning boundary to exclude Third Avenue.

We hope that the Greater East Midtown Rezoning can achieve both goals: spurring needed development in Manhattan's premier office district, and safeguarding sunlight access to one of Manhattan's most critical small parks.

Thank you for consideration of our testimony.

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*For over 100 years, [New Yorkers for Parks](http://www.ny4p.org) (NY4P) has built, protected, and promoted parks and open spaces in New York City. Today, NY4P is the citywide independent organization championing quality parks and open spaces for all New Yorkers in all neighborhoods. [www.ny4p.org](http://www.ny4p.org)*