

October 11, 2023

Hon. Daniel Garodnick Chair New York City Department of City Planning 120 Broadway New York, NY 10271

## Dear Chair Garodnick:

As the business improvement district representing one of New York City's largest business districts, the Downtown Alliance strongly supports the Dept. of City Planning's proposed "City of Yes for Economic Opportunity" initiative. This package of zoning reforms would provide property owners and entrepreneurs in Lower Manhattan with the tools and flexibility necessary to maintain the active and inviting streetscape that is so critical to the long term success of our district

Lower Manhattan's remarkable reinvention over the last two decades has been driven in no small part by the vibrancy and dynamism of our district's retail sector. Vibrant and diverse ground floor uses have long been recognized by urbanists and planners as a key hallmark of a successful business district. Our district today is home to over 1,000 storefront businesses ranging from neighborhood mom-and-pop stores to global luxury brands.

Despite these successes, Lower Manhattan is faced with the same challenges that are confronting commercial districts across the country. Changing consumer spending habits and the rise of e-commerce were already putting pressure on bricks-and-mortar retail before the COVID-19 pandemic ushered in epochal changes in office use. Macroeconomic uncertainty, inflation and ongoing labor shortages further cloud the future of our district's retail corridors.

In this uncertain environment entrepreneurs and property owners need the regulatory flexibility to find creative, attractive and viable uses for ground floor retail space. DCP's proposed set of zoning text amendments would go a long way toward allowing and indeed encouraging the sort of creativity that is needed to develop the retail corridors of the future. Allowing for "maker spaces," urban agriculture, and small scale entertainment venues would allow for more diverse and interesting retail corridors. Updating long obsolete use restrictions would provide businesses



and community leaders alike with greater clarity on how ground floor spaces can be appropriately activated.

Given a supportive regulatory environment, small business owners and entrepreneurs can seize this unique opportunity to create a new and sustainable vision for the future of our city's retail. As such, the Downtown Alliance strongly encourages the speedy adoption of these much needed and common sense zoning reforms within all applicable rules and regulations.

Sincerely,

Jessica Lappin

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President