

January 12, 2009

Mr. Michael McSweeney  
First Deputy & Acting City Clerk  
Office of the City Clerk  
Lobbying Unit  
141 Worth Street  
1st Floor  
New York, New York 10013

**Re: Supplement to Testimony Provided on Intro 870 (2008)**

Dear Mr. McSweeney:

These comments are submitted as a supplement to the comments provided by our client Earle W. Kazis Associates, Inc ("Kazis") at a hearing on Intro. 870 (2008) related to the formation of the Hudson Square Business Improvement District. ("Hudson Square BID") Our client opposes that his buildings be included in the Hudson Square Bid for the following reasons:

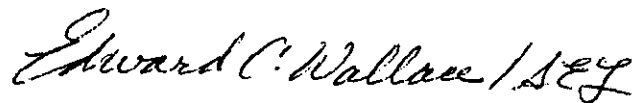
- We believe that Kazis was not properly provided notice and an opportunity to be heard with regard to the formation of the Hudson Square Bid as required by NYC law.
- Kazis properties are currently at the easternmost boundary of the proposed Hudson Square Bid. The properties, which are contiguous and connected, located at 161 Avenue of the Americas and 233 Spring Street (jointly the "Kazis Properties") have historically been branded "the gateway to SOHO." Rebranding these properties may cause confusion to current and prospective tenants and have a negative effect on the ability to market space in the properties.
- Given Kazis Properties location at the easternmost edge of the Hudson Square BID boundaries, the Kazis Properties could easily be removed without materially affecting the proposed Hudson Square Bid boundaries or objectives.
- Earle Kazis was one of the founders of the Soho Partnership (an organization created by the Association of Community Employment for the Homeless). Kazis has been a long time funder of this worthy organization which employs formerly homeless individuals. The Soho Partnership already provides the services to Kazis Properties that would be

provided by the Hudson Square Bid. Kazis could not continue to fund the Soho Partnership if assessed fees for duplicative services provided by the Hudson Square Bid.

- The bulk of the budget for services provided by the Hudson Square Bid is related to traffic management related to Varick Street access to the Holland Tunnel. However, traffic management has not be an issue for the Kazis Properties which are not located near the tunnel.
- The proposed assessment for Kazis Properties would total nearly 100k annually for services Kazis is already receiving and for services Kazis does not need. This would lead to an almost \$.20 per square foot increase to tenants during a very difficult economic period.

For all of the above reasons, we respectfully request that the Kazis Properties be removed from the boundaries of the proposed Hudson Square Bid as stated by Earle Kazis at the recent City Council Hearing on the matter.

Very truly yours,



Edward C. Wallace

cc: Honorable Speaker Christine Quinn  
Honorable David Weprin  
Honorable Leroy Comrie  
Haeda Mihaltses