

From: [300Albany_5H](#)
To: [Land Use Testimony](#); [Drummond, Anthony](#); [Fung, Cora](#); [District2](#); [Rivera, Carlina](#); [Cehonski, Irak](#); [Speaker Corey Johnson](#); [Bottcher, Erik](#); [Comerford, Patrice](#); [Office of Council Member Powers](#); [Levine, Mark](#); [Lander, Brad](#); [AskJB](#); [Salamanca, Rafael](#); [Moya, Francisco](#); [glickd@assembly.state.ny.us](#); [Helen@helenrosenthal.com](#); [District7](#); [Avala, Diana](#); [D09Perkins](#); [Rodriguez, Ydanis](#); [Dinowitz](#); [Gonaj, Mark](#); [Cabrera, Fernando](#); [District16Bronx](#); [Diaz, Ruben](#); [District19](#); [Koo, Peter](#); [Costa Constantineides](#); [Grodenchik, Barry S.](#); [Dromm, CM](#); [Van Bramer, Jimmy](#); [Adams, Koslowitz, CM](#); [District30](#); [Ulrich, Eric](#); [Levin, Stephen](#); [Reynoso, Antonio](#); [Cumbo, Laurie](#); [Corney, Robert](#); [District37](#); [info38](#); [Council Member Lander](#); [Eugene, Mathieu](#); [District41](#); [Barron, Inez](#); [AskKalman](#); [District45](#); [Maisel, Alan](#); [Treyger, Mark](#); [Deutsch, Chaim](#); [Rose, Deborah](#); [Matteo, Steven](#); [Joseph Borelli](#); [joddo@statenislandusa.com](#); [BKallos@benkallos.com](#)
Subject: [EXTERNAL] Vote no Chin's punitive plan
Date: Wednesday, December 8, 2021 9:36:12 AM

Intro 2443-2021 please vote no

>

> Dear council,

>

> I'm a longtime resident of soho and I plead with you to vote no to

> Margaret Chin's insane legislation. It's a last minute gift to developers and retailers at the expense of her constituents. She is selling us out on her way out for nothing. This is criminal and insane and sets a dangerous precedent. She didn't speak to residents, and her team was callous and lazy about drafting this. The unintended consequences will destroy our neighborhood Who has the right to apply fines based on your chosen career ?

> We've all had enough issues through Covid to stay afloat and this is completely insane.

>

> Please vote no, prove we still have decent elected officials. You don't owe her any favors, think about the people first

>

> Best

From: [Alexander Adler](#)
To: [Land Use Testimony](#)
Subject: [EXTERNAL] Vote No on the SoHo/NoHo/Chinatown Upzoning Plan
Date: Wednesday, November 3, 2021 3:00:54 AM

To the City Council:

I strongly urge the City Council to vote no on the disastrous SoHo/NoHo/Chinatown upzoning plan. This proposal would fulfill none of its affordable-housing promises, as it actually makes it more profitable to build without affordable housing than with. It will create huge incentives for destroying the hundreds of existing units of rent-regulated and loft-law affordable housing in the neighborhood, disproportionately occupied by lower-income, senior, artist, and Asian American residents, many of whom would be displaced. It will push out arts and any other small businesses with its allowance for giant big-box retail of unlimited size. It will encourage grossly oversized development up to 2.5 times the size current rules allow, and more than 2.5 times the size of average buildings here now. It will encourage the destruction of historic buildings, and allow developers to add luxury condos and apartments with no affordable housing so long as they don't exceed 25,000 sq ft per zoning lot. Even in this relatively wealthy neighborhood, new development even with the 25–30% “affordable” housing will still overall make the neighborhood richer, less diverse, and more expensive, as the new market-rate units would be so expensive and the “affordable” ones unaffordable to even a significant share of residents here.

The City has consistently lied about the impact the rezoning would have and who would be hurt by it. It's the lower-income tenant-renters, artists, seniors, and Chinatown residents who will be most hurt. Neighbors support an alternative plan for real affordable housing without displacement, oversized development, and big-box chain stores. Vote no.

Regards,
Alexander Adler
7 Wooster St
New York, NY 10013

November 9, 2021

SoHo-NoHo Rezoning – Summary of Comments

I am an architect living and working in SoHo for more than 40 years, representing NY Loft Tenants as well as private clients. I was a stand-in member of the Envision Advisory Board.

Many issues remain in this re-zoning proposal that are not well worked out, obscure and are likely to produce unexpected and unacceptable results. The open question remains, is there enough time to rethink, adjust or rewrite portions of this text so as to eliminate these problems and achieve a positive and balanced result? This is a massive rezoning that was intended to replace many obsolete features. It took 50 years to get here: is waiting a few more months to get it right worthwhile?

A. Conversion and Preservation

The issue that is causing the most concern and dissatisfaction is the way conversion is proposed to be dealt with: while the Joint Living-Work Quarters for Artists is not eliminated, the proposal eliminates the creation of new conversions to that use group and does not allow the creation of new floor area in that use group, forcing the juxtaposition of residential (UG2) and JLWQA (UG17) uses in the same building if any new residential conversion and/or enlargement of partially-converted buildings is undertaken. This will expose the MDL and Building Code incompatibilities between these R and M zone uses (in lighting and ventilation, particularly the depth of coverage from windows, art studio use restrictions, egress methods and yard/court minimums). But the most prominent consequence and the one that has raised the highest dissatisfaction in the community is the absurd proposal to impose an enormous tax on the very artists and homesteaders who created the neighborhood in order for them to be able to sell their spaces when they retire or give them to non-artist heirs. A classic Soho-NoHo 2,500 SF loft would be required to pay a \$ 250,000 tax to sell at market value. Remarkably, the CPC could find no other source of support to foster the arts in this "artist-only" neighborhood! New non-artist residents, new offices with doubled FAR, new retail stores – all become legal with no fees.

There is a simple way to eliminate these painful, dysfunctional solutions: eliminate the problem! The "curated" threshold (new artist certification) has already been removed in the CPC proposal: no new JLWQAs are allowed, as there is no mechanism left in place to create them. That leaves no reason to maintain the artist exclusivity of JLWQAs: so declare them to be Joint Live-Work Quarters for Anyone – and preserve the one valuable characteristic that differentiates them from converted space in a generic M/R zone: the presence of actual and viable mixed-use spaces, where there is no limit to how much of each space is used to live, and how much to work – and where all artist and "maker" uses that are now legal in M1-5A/5B can continue to exist and to produce a viable creative environment.

New open-to-everyone JLWQAs will fit seamlessly in with existing partially and fully converted buildings as side-by-side neighbors or in additions or enlargements. Even new buildings can be built as JLWQAs – the only thing required to achieve all of these goals are minor text changes. No anti-artist conversion fees would be required. All MDL and Building Code compatibility problems would be solved. No (expensive) C of O changes or building updates would be required. MIH will still be triggered, with a minor re-write applicable within this SNX special district. And this does not eliminate the option of creating new residential (UG2) buildings or converting fully commercial buildings to UG2, if wanted.

B. Substantial Enlargement and Demolition

Demolition of tenement buildings or residentially-occupied loft buildings in SoHo-NoHo (especially portions that are not part of the Historic Districts) will follow this re-zoning if enacted as proposed. FAR is slated to increase throughout the district at various rates, more than doubling it in some portions. The increase of most properties' development potential (and value) by an increase in FAR and/or the modification of height, setback and density rules, will produce market pressure inevitably resulting in the demolition of existing non-historic district structures that are substantially smaller than would be allowed by the new FAR. To take advantage of even moderate permitted enlargement potential, non-fireproof buildings allowed to grow beyond height limits established by the regulatory methods listed below may have to be completely demolished as well. These include:

- the Multiple Dwelling Law (Art. 7B) for non-fireproof loft buildings (7 stories and 85 feet of total building height), or
- the NYC Building Code for non-fireproof buildings such as tenements and converted dwellings (generally similar limits), or
- limitations set by thresholds of fire escape heights combined with single-stair configurations.

Substantial portions of SoHo-NoHo that are in several Historic Districts are still subject to FAR and height increases. Contrary to popular perception, some buildings subject to Landmarks Preservation Commission jurisdiction can be completely demolished, if they are deemed non-contributing, which many tenement buildings might be. Others may be substantially-demolished, leaving only a façade while the non-fireproof structure behind would be replaced by a fireproof structure to create a setback enlargement that can in many cases be substantial if shielded from view by taller adjacent structures or other specific site characteristics.

This district contains rent-controlled and rent-stabilized residential units, IMD lofts that will eventually become rent-stabilized units, and units subject to the old AIR program. One of the Community's main concerns is that demolition will result in the elimination of existing rent-regulated housing that today provides much deeper affordability than any new housing created under the MIH program. It would be an ultimate irony if the new zoning would eliminate existing truly low-rent housing, either small apartments in old tenement buildings, or the lofts of the homesteaders from the 1970's and 1980's who created this neighborhood, while creating new but comparably less affordable and in the case of tenements, generally less dense MIH program housing. The MIH program would be fulfilled but the real cost to the community would be scandalous, particularly if the replacement produces no MIH housing through the deliberate manipulation of MIH thresholds or a choice to build 100% offices as the proposed re-zoning would seem to allow.

The creation of a SoHo-NoHo Special District allows this specific obstacle to be overcome, preserving existing deeply-affordable housing and encouraging production of new affordable housing under a district-specific modified MIH program (avoiding rewriting the program for the entire city but testing ways where it can be improved). See appendix below for further specific suggestions.

C. Art District Vitality

It is the new non-artist uses coming into this neighborhood that should be used to subsidize the art viability of this re-zoned area, not the district's homesteading artists and makers. New residential UG2 uses and new commercial and particularly retail uses above existing thresholds could be "taxed" to benefit an Art Fund, since they are the uses diluting the area's art viability (of course not at the high level/SF proposed by CPC). Funding arts organizations is a disappointingly bureaucratic response: a better method would be to create new deeply affordable artist/maker housing by directing a portion of the MIH program to benefit what had always been an "Envision" goal (page 44: new "Live-Work") but no mechanism had ever been identified. The Art Fund could support these small JLWQAs and related co-work and exhibition spaces: this is the best way to create some real, ongoing vitality for the arts, a real investment in the city's future.

D. MIH in SNX: Local Variations

Page 57 and 58 of the CPC-approved proposal states "MIH applied to any zoning lot with 12,500 SF of residential capacity". This is clearly new, a local adjustment of MIH: the "under-building" dis-incentive should include (if it doesn't already) filling in a lot with commercial uses (above the 1st floor, of course) up to 100% of the lot's potential, so as to level the playing field between residential and commercial funding sources for affordable housing.

At the present time, paying into a fund to create affordable housing is so onerous no one has used the program. It's encouraging to see some first steps to recognize that SNX building typology does not always fit the MIH program (p. 59-60). Please simplify the fund process and consider allowing an option for unrelated developers of separate projects to pool their resources to insert or create new affordable housing in the required total floor areas within an area within or adjacent to SNX but a few blocks larger (there are very few vacant and suitable sites available in SNX).

E. Office Use Preservation

Celebrating exceptional transportation system access suitable for jobs access (p. 7), applying MIH to residential use only thus incentivizing commercial use, and seeking to reserve large buildings for office use (map on Page 77 indicates that up to 1/3 of total SNX floor area identified as "blue" lots corresponding to the tallest and densest buildings would be off-limits to conversion) reveals this proposal's overwhelmingly pro-office bias. The CPC should be wary of using zoning to preserve uses and counteract market forces: 50 years ago, zoning sought to preserve manufacturing uses that became obsolete within just a few years, and we are still dealing with the inequities that were left in the wake of that mistake. Office projects are already the choice of most land owners today: the CPC should seek to level the playing field and not attempt to dilute the mixed-use characteristic that makes this area a creative hub today and the flexibility of the live-work environment to produce the creative environments for the city's competitive future on the world stage.

F. Corridor Up-Zoning

The CPC proposal substantially increases the FAR in the 400-foot wide (not including the width of Broadway itself) "Corridor" area between Mercer and Crosby Streets, extending further to Lafayette Street in its north portion. This "Corridor" should be a 100-foot-deep overlay on both sides of Broadway and extending only on selected blocks to Mercer, Crosby and Lafayette Streets, reflecting variations in their urban scale, as most of these blocks of narrow streets are low-rise at this time.

Appendix

A. Residential and JLWQA Conversion and Enlargements Standards

There is a profound difference between buildings "designed for residential use" and buildings designed for industrial or commercial use that follow significantly lesser standards for light and air (the standards that produce the exterior geometry of these buildings by shaping yards, courts, setbacks etc.), egress (that often shapes unit configuration or viability), and construction class (that can determine size and height). In almost all cases, residential use carries with it stricter standards, reflecting the amount of time spent in such spaces and adding a delay factor for the sleep cycle. These differences are most clearly manifested (and become a potential conflict) between existing fabric and its enlargements – and between adjacent buildings viewed from an urban context basis.

The underlying principle that shapes this difference is that residential conversion standards are intended to create mixed-use buildings and neighborhoods whereas new construction standards are for the creation of a single use, following early 20th century planning principles of separating uses.

Within existing fabric, the differences are mild: Art. 1 Ch. 5 (ZR 15-112) basically sends you back to MDL 277 (Art. 7B) to establish light and air and other geometric requirements, and the same occurs for M1-5A and M1-5B (ZR 43-17). Minor differences and the 1,200 SF minimum promoted by both MDL 277 and the Zoning Resolution can be terminated without too much difficulty. For Loft Dwellings, ZR 111-40 attempted to stand on its own and is an interesting attempt but it used 30-foot rear yards and 2,000 SF unit minimums, both were impractical and required demolition to create rear yards or resulted in very large units.

But it's the introduction of new floor area to an existing building or to a SoHo-NoHo block, as new construction, that will cause the greatest disruption. New residential floor area is required to achieve a level of "sanitary" (light and air) and egress standards that are incompatible with old loft buildings.

Existing Fabric Issues

The biggest problem is with ZR 15-024 for IMDs and "grandfathered" uses established and certified by the CPC or the Loft Board as residentially used before 9/01/80: they were allowed to remain, effectively, as they were. In return, in such buildings, the introduction of new residential units or JLWQAs (by additional conversion or enlargement) was strictly forbidden. These units have to be allowed to remain undisturbed so any conversions above and especially below have to preserve them.

Here, and perhaps in general (as converting loft buildings that are sometimes configured oddly) this rezoning has to give the DOB the authority to vary standards if necessary to deal with problematic individual issues instead of sending them to the BSA in every case. When the Loft Law was being renewed in Albany in the early 1990s, I attended on behalf of the LMLT and managed to get language inserted into the renewal that gave the DOB authority to vary the standards of Art. 7B (a NY State law) without having to send each such case to the BSA or to the NYS Legislature. This proved prescient (MDL 277.16 made effective by LPPN #4/92): we would have bogged down in useless procedures for decades if that has not been done. We need to establish this same type of authority here too, so as to preserve the goal of “converting without destroying”, while converting the maximum amount of space possible to create as much affordability as possible.

The other issue is with preservation: the LPC over the past decade has drifted to a policy of protecting the rear facades of buildings even if they are not visible from a public space or street (a city block is like a donut in that view). The standards are lower, but at the very least, they require the maintenance of a visible top of the historic rear wall: one could modify the rear wall below its top and one can add above, set back. One more reason why the LPC should have been involved in this discussion.

The differences between JLWQA and Residential Units within MDL 277 are not significant. For light and air, JLWQAs are sent to the 1968 code, whereas for residential units, the standards are listed in 7B and are truly liberal, including 5-foot-deep rear yards (even if the DOB tries to misread that and make it 15 feet!). But those differences can I think be overcome.

Enlargements

The contradictions between conversion laws and new construction laws become apparent and can lead to insurmountable problems when existing loft buildings get enlarged, something that will occur when you increase FAR in such zones, especially in portions outside of historic districts. The most important principle is that solutions have to be developed that would not result in the issues being so intractable that demolition would result – because one of the consequences of demolition is the termination of rent-stabilized occupancies, and that is the status of all IMDs in the end.

The most significant problem with enlargements is that the MDL is a State Law and it pulls in other sections of the MDL (such as the Old Law tenement rules or Converted Dwelling standards) or the NYC Code selectively, using the 1968 code to determine many standards or to give alternates to its own rules. New construction (anything that is more than a penthouse) is understandably not allowed to follow those rules. This is where the maximum creativity has to be applied, to make new construction in this zone to follow what would be in effect an extension of conversion rules, perhaps with stricter standards for yards and courts above the existing bulk.

Under MDL 277, building size, construction class, fire resistance standards are all loft-building specific: egress (travel distances, number and width of exits) for example could never satisfy the building code’s new standards for residential use. So either enlargement would be precluded (or limited to penthouses that are not considered to be “new” floor area – that concept has to be restated to avoid major building work just to create a small penthouse) or the buildings would have to be, effectively, demolished (even behind exiting facades). This is a process that would eliminate rent-regulated units and the fabric of an existing neighborhood.

The physical methods of enlarging a loft building (especially a non-fireproof one) has to be thought through, so as to avoid the structural stability problems encountered with 285 Lafayette Street.

On a practical level, new JLWQA fabric has to be allowed (i.e. JLWQAs cannot be limited to being created only in pre-1961 space), and the same would possibly apply to all new building fabric created above or next to an existing converted loft building (or one undergoing conversion): this I think will eliminate this set of problems.

New construction that has to comply with any number of systemic code-related standards that an existing loft building could not possibly comply with, would have to be subject to modified standards that would not cause a retrofit of lower floors that would effectively destroy what exists. Otherwise, you would be limited to penthouses.

Finally, I think penthouses should be allowed under the old "roof mezzanine" rules, as they gave a way to at least some enlargement without having to retrofit the entire building. The same standards should apply to all floor area relocated when, for example, carving out a new or larger yard or court. It should be clearly spelled out that relocated floor area is not "new" floor area, and that it plus a 33% penthouse should not be added together to trigger being viewed as "new" floor area.

But as a condition to any such enlargements, green roofs for any penthouse, enlargement or perhaps even new conversions should be a requirement. We must slow down the storm drainage flow that is clearly increasing because of climate change, by cutting peak loads by slowing down the runoff and allowing evaporation and gray water reuse, using plants and other similar methods.

B. Substantial Enlargement and Demolition

This section requires a considered collaboration between the CPC, the state legislature and the legal profession, as the preservation of existing rent-regulated rental housing is critically affected.

- It should be a SoHo-NoHo district requirement that in order to benefit from any FAR or other height increase or enlargement, any rent-regulated or statutorily-protected housing has to be preserved even if the building containing it is substantially or completely demolished, by the re-creation of an equivalent-size and quality residential space on-site or within two or three blocks of the existing housing, and the existing protected occupants/residents offered this space under the same program they are now subject to. This is a similar set of rights granted to over-65 residents for personal-use evictions under rent-stabilization. Quality means ceiling height, amount of light, floor level, view, etc., characteristics that are deliberately designed to be hard to match, encouraging the re-building of the same space on-site within a new, taller fireproof building instead of relocating these protected residents elsewhere.
- This preserved or re-created housing would be treated as "deeply-affordable" residential floor area under the MIH program, and would thus reduce the MIH program requirement under the 30% ratio of affordable to market-rate area.
- If the spaces these residents now occupy are not code-compliant or provided with a C of O, relocation to a new space can happen immediately, without first having to bring the existing

space to a C of O and rent-stabilization status, as long as the new space is code-compliant and rent-stabilized at a rent level equivalent to the existing space (with statutory rent adjustments).

- If the choice is made to build a new office building on a site now containing any number or type of rent-regulated or statutorily-protected housing, the building becomes subject to the MIH program regardless of the ultimate choice of dominant use. This is one of the benefits of a mixed-use area, and of a Special District. I already suggested that all construction in this Special District should be subject to a modified MIH, regardless of the choice of use an owner makes: however, it is imperative that any site that now contains housing will provide at least the same amount of housing floor area that it does now and that new floor area on such a site would contribute at least 30% affordability regardless of the market-rate floor area use.
- If the building is mostly an office building, it is logical for the residential and office entrances be separated. If the ratio is closer to equal, and the building does not exceed 6 stories or 5,000 SF per upper floor (picking numbers relatively arbitrarily), the building would be allowed to have a single entrance and circulation system.
- As discussed elsewhere, new affordable housing can be small JLWQAs for newly-certified artists, makers and creators/curators/etc. under the new Special District-specific MIH program.

Opposition to SoHo NoHo Rezoning (Hearing on November 9, 2021)

My name is Alison Greenberg. I lived downtown for many years, including on West 8th Street. I was a member of CB2 Manhattan. I reside on the Upper West Side. I am the president of the Historic Districts Council but I am submitting this opposition to the rezoning solely in my individual capacity.

The unique zoning in SoHo and NoHo was established to draw in more artists to what was a post-industrial wasteland. The artists and other intrepid settlers moved in, creating an affordable, interesting and unique place due to both the cast iron buildings and their occupiers that had made the neighborhoods more livable.

In the 1970's the people who moved in and took a chance on an area that had limited services and essentially no retail corridor. These neighborhoods began to become livable because of the work, effort and cultivation of the the artists and other residents.

And then came the developers, building on old gas station lots and any other space where they could try to build. There is now a luxury element to the area. But it is still a place filled with middle class housing and people who made an inhabitable area what it is today.

A significant portion of the site area is designated as historic districts. The proposed development, inside and out of the HDs, will totally undermine the significance of the historic district designations. The plan will encourage demolition of historic buildings recognized as historic landmarks.

We sadly have various agency and administration leaders and "Open New York" representatives who have injected race into things, trying to pit people against each other. This is not fair. **This is not leadership.** It is simply not true that this plan – without true affordable housing guarantees – which will radically change the built environment of these neighborhoods is for equity.

You will push out longtime residents of the neighborhood and arts groups and small businesses. There are so many loopholes in the plan that the plan is likely to result in little or no affordable housing.

Why don't the people who live here matter? Why is it NIMBY for residents to fear they will be priced out. People who live in these neighborhoods and own businesses don't want to be priced out because of some outlandish rezoning plan being pushed by agency heads and an administration that favors real estate speculators and developers.

The plan will not be a champion for affordable housing. This plan will displace the residents and small businesses and clear the way for out of scale development that will transform SoHo,

NoHo and Chinatown into unrecognizable neighborhoods, its residents pushed out, its buildings a hodgepodge of the shiniest and newest, the soul of the city killed again.

Please reject this plan.

Please surprise us.

Alison Greenberg
327 West 89th Street
3F
NY, NY 10024

From: [Amanda D'Avria](#)
To: [Land Use Testimony](#)
Subject: [EXTERNAL] SoHo/NoHo Rezoning: Written Testimony
Date: Friday, November 12, 2021 10:54:39 AM

Hi there, my name is Amanda D'Avria and I am a NoHo resident (Community District 2, just south of Union Square).

I am writing to express my strong support of the SoHo/NoHo rezoning—New York badly needs more mixed-income housing, and SoHo and NoHo are precisely the kinds of high-opportunity, transit-rich neighborhoods where it ought to be built.

According to the City's demographic analysis, the rezoning area is 77% white, compared to 32% for the city as a whole. It is vital for the whiter and wealthier parts of the city to allow mixed-income housing to stem displacement and residential segregation, especially as New York is already among the most segregated cities in the country. Village Preservation attempts to argue that new mixed-income housing wouldn't help to desegregate the neighborhood, but they have no idea what the racial demographics of new market-rate apartments would be. The Census Tract containing Court Square in Long Island City has seen 70% of its housing stock—thousands of apartments—constructed after its 2001 rezoning, and the area is substantially more diverse than SoHo, at only 45% white. Other than Gowanus, SoHo/NoHo is the only rezoning the current administration has proposed for a wealthy, white neighborhood. By contrast, all of the administration's past rezonings have focused on low-income neighborhoods of color, and **it is unfair to ask these neighborhoods to take on the majority of the city's new construction.** Places like SoHo have to start doing their fair share. There's a reason many of us love this neighborhood and it should not require being in the top 5% of the city in income to make a home here.

In addition, I would also ask the City Council to make two changes to the plan—while I support the added density for housing, its proposed commercial densities are too high. There is a risk that developers will choose to build only office space, as offices could be leased at wholly market-rates, and would not need to provide affordable housing.

I also believe the City should change its community preference policy for this rezoning, to allow residents of the Lower East Side and Chinatown, or the City more broadly, to have equal access to the affordable apartments as would residents of Community Board 2.

Lastly, I would ask the City Council to require the deepest possible level of affordability for the below-market apartments. I hope this rezoning can be a force for racial and socioeconomic integration in two of Manhattan's most segregated neighborhoods, and ensuring subsidized apartments are affordable to the income brackets where they are most sorely needed would go a long way towards doing so.

Thank you for considering my written testimony.

Best,
Amanda D'Avria
Community Board 2 Resident

From: [Amelia Dallis](#)
To: [Land Use Testimony](#)
Subject: [EXTERNAL] Please don't ruin downtown
Date: Thursday, November 11, 2021 2:18:02 PM

The plan to allow downtown NYC to rezone is truly abhorrent.

The out of scale development in this district will not only threaten affordable housing but will diminish the aesthetic and historic nature of the area for all residents and visitors.

Please reconsider and curtail the expansion so that we can continue to thrive as community in these vibrant, growing, and livable neighborhoods.

Thank you,

Amelia Dallis // Producer // [REDACTED] // 10blue // ameliadallis.com

From: [Amy Harlib](#)
To: [Land Use Testimony](#)
Subject: [EXTERNAL] Vote No on the SoHo/NoHo/Chinatown Upzoning Plan
Date: Wednesday, November 3, 2021 12:11:34 AM

To the City Council:

I strongly urge the City Council to vote no on the disastrous SoHo/NoHo/Chinatown upzoning plan. This proposal would fulfill none of its affordable-housing promises, as it actually makes it more profitable to build without affordable housing than with. It will create huge incentives for destroying the hundreds of existing units of rent-regulated and loft-law affordable housing in the neighborhood, disproportionately occupied by lower-income, senior, artist, and Asian American residents, many of whom would be displaced. It will push out arts and any other small businesses with its allowance for giant big-box retail of unlimited size. It will encourage grossly oversized development up to 2.5 times the size current rules allow, and more than 2.5 times the size of average buildings here now. It will encourage the destruction of historic buildings, and allow developers to add luxury condos and apartments with no affordable housing so long as they don't exceed 25,000 sq ft per zoning lot. Even in this relatively wealthy neighborhood, new development even with the 25–30% “affordable” housing will still overall make the neighborhood richer, less diverse, and more expensive, as the new market-rate units would be so expensive and the “affordable” ones unaffordable to even a significant share of residents here.

The City has consistently lied about the impact the rezoning would have and who would be hurt by it. It's the lower-income tenant-renters, artists, seniors, and Chinatown residents who will be most hurt. Neighbors support an alternative plan for real affordable housing without displacement, oversized development, and big-box chain stores. Vote no.

Regards,
Amy Harlib
212 W 22nd St
New York, NY 10011

From: [Amy Zeng](#)
To: [Chin, Drummond, Anthony](#); [Fung, Cora](#); [District2, Cehonski, Irak](#); [Speaker Corey Johnson](#); [Bottcher, Erik](#); [Comerford, Patrice](#); [Office of Council Member Powers](#); [Levine, Mark](#); [Lander, Brad](#); [AskJB](#); [Salamanca, Rafael](#); [Moya, Francisco](#); [glickd@assembly.state.ny.us](#); [Helen@helenrosenthal.com](#); [District7, Ayala, Diana](#); [D09Perkins](#); [Rodriguez, Ydanis](#); [Dinowitz](#); [Gjonaj, Mark](#); [Cabrera, Fernando](#); [District16Bronx, Diaz, Ruben](#); [District19, Koo, Peter](#); [Costa Constantinides](#); [Grodenchik, Barry S.](#); [Dromm, CM](#); [Van Bramer, Jimmy](#); [Adams, Koslowitz, CM](#); [District30, Ulrich, Eric](#); [Levin, Stephen](#); [Reynoso, Antonio](#); [Cumbo, Laurie](#); [Corney, Robert](#); [District37, info38](#); [Council Member Lander](#); [Eugene, Mathieu](#); [District41, Barron, Inez](#); [AskKalman](#); [District45](#); [Maisel, Alan](#); [Treyger, Mark](#); [Deutsch, Chaim](#); [Rose, Deborah](#); [Matteo, Steven](#); [Joseph Borelli](#); [joddo@statenislandusa.com](#); [BKallos@benkallos.com](#); [Land Use Testimony](#)
Subject: [EXTERNAL] VOTE NO ON SOHO/NOHO REZONING
Date: Tuesday, November 9, 2021 7:53:41 PM

Hi all,

I write today to submit testimony AGAINST the impending possible rezoning of Soho/Noho. This plan will not create economic diversity because it does not guarantee actual "affordable" housing; instead, it opens the floodgates for a massive increase in luxury dwellings. Why do we want another Midtown or Tribeca?

Furthermore, the plan proposes a nearly 50% increase in population for the neighborhoods but no accompanying infrastructure or improvements. There are no parks, no schools, and no hospitals slated to accompany the rezoning. The Mayor's plan--which city councilmembers Margaret Chin and Carlina Rivera should be ashamed to support--is dependent upon the whims of private property owners and provides no real "end benefits" to the community or neighborhood, destroying the character of a historically important and vital area and destroying that which makes NYC a great city.

Best,
Amy Zeng (District 1 resident)

From: [Ann Hall](#)
To: [Land Use Testimony](#)
Subject: [EXTERNAL] Vote No on the SoHo/NoHo/Chinatown Upzoning Plan
Date: Thursday, November 11, 2021 8:35:43 PM

To the City Council:

I strongly urge the City Council to vote no on the disastrous SoHo/NoHo/Chinatown upzoning plan. Aside from all the arguments stating that it will create opportunities for developers to drive out current residents and independent businesses in favor of condos for the rich and big-box stores - with which I agree - I am deeply concerned about the fate of the Merchants House Museum & the many buildings of historical interest.

Over the past 20 years, I have seen my former neighborhood, the East Village, fall victim to developers who have torn down old low-rise buildings & put up glass boxes. The many small & unique businesses are gone, & big-box stores & chains have moved in - & the rents, as small businesses have been displaced, have skyrocketed. Now I see one vacancy after another, b/c no one can afford to open a new restaurant or other business.

New York does not need any more overpriced modern condos, hotels, & the like. Please don't rezone some of the last Manhattan neighborhoods that still retain their character & history.

Thank you.

Regards,
Ann
35th
Queens, NY 11372

Hall
Ave

From: [Anna Harsanyi](#)
To: [Land Use Testimony](#)
Subject: [EXTERNAL] Vote No on the SoHo/NoHo/Chinatown Upzoning Plan
Date: Wednesday, November 10, 2021 10:10:19 AM

To the City Council:

I have lived in the Lower East Side for 15 years, and am writing to urge you to deny the City's rushed and reckless plan to rezone SoHo, NoHo, and Chinatown. Community Board 2 did the right thing when they voted in opposition to the mayor's rezoning proposal, and I ask that you stand with them and the community.

The proposal is a hastily conceived giveaway to developers at the expense of our community. It claims to create affordable housing, when there is no guarantee in the proposal that any such housing would actually be mandatory. In fact, the upzoning will displace thousands of low-income tenants and demolish affordable housing units. Furthermore, air-rights are being given away for free while no public services are being invested in for the community: no new schools, more sanitation or police services, a community center, not an inch of recreational or green space.

The quality of life in our downtown neighborhoods are already suffering by unregulated late night bars and clubs, saturating our streets with party crowds who come from outside of the area only to binge drink and party without concern for our neighbors. By lifting all restrictions on oversized retail stores, as well as huge eating and drinking establishments, the plan will witness a tsunami of big-box stores, oversized restaurants, and enormous bars and clubs. This will destroy the character of the neighborhood and the quality of life for residents. Moreover, it will help push out small businesses and specialty shops.

The plan proposes massive increases in the allowable height and density of buildings, the floor-to-area ratio (FAR). Buildings with the same FAR as 57th Street will create a wall of massive towers stretching from Mercer Street to Broadway and on through to Crosby Street. A similar wall of towers is planned along Lafayette Street in NoHo.

This plan calls for the first upzoning of an historic district in the sixty-six years of the Landmarks Preservation Commission's existence. City Planning asked many agencies to participate in the process. Shockingly, the Landmarks Preservation Commission was not one of them.

SoHo and NoHo must evolve in a creative and sustainable way. We need affordable housing and a path for legalizing JLWQA. With vision and thoughtfulness, both can be achieved without a massive developer-driven upzoning that promises neither.

I ask you to say "NO" to the Mayor's misguided plan.

Sincerely,

Anna Harsanyi

Regards,
Anna Harsanyi
83 Chrystie St
New York, NY 10002

From: [Mitcheltree, Anne](#)
To: [Land Use Testimony](#)
Subject: SoHo/NoHo/Chinatown Upzoning
Date: Wednesday, November 3, 2021 12:21:43 PM

Dear Sir/Madam:

On Tuesday November 2nd, 2021, I voted as a proud American. But, most recently, I am beginning to wonder why I continue to vote.

Those who are planning to tear down my beloved neighborhood landscape didn't vote in Manhattan

on Tuesday November 2nd. Most of the profiteers who are ruining this city will never live in it. I just want to restore democracy and the will-of-the-people.

I realize some of you will never appreciate the gracious beauty of architecture.

You seem to not notice how hideously blank and dull the

new buildings are. Please listen to the people who live here and stop this scheme of gold-rush opportunists.

More than a dozen local community and tenant groups have offered alternative plans allowing construction of affordable housing without tenant displacement. NYU expansion has only flooded the East Village with young people who storm the city at night disturbing families, working adults and seniors.

Please vote NO on this current plan and open the discussion to the citizen-groups who have come forward with better plans.

Yours sincerely,

Anne Mitcheltree

Visit www.nychealthandhospitals.org

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intended recipient, any disclosure, copying, distribution or any action taken or omitted to be taken in reliance on this e-mail, is prohibited and may be unlawful. If you have received this E-Mail message in error, notify the sender by reply E-Mail and delete the message.

From: [Anne Mitcheltree](#)
To: [Land Use Testimony](#)
Subject: [EXTERNAL] Vote No on the SoHo/NoHo/Chinatown Upzoning Plan
Date: Wednesday, November 3, 2021 2:38:54 PM

To the City Council:

I strongly urge the City Council to vote no on the disastrous SoHo/NoHo/Chinatown upzoning plan. This proposal would fulfill none of its affordable-housing promises, as it actually makes it more profitable to build without affordable housing than with. It will create huge incentives for destroying the hundreds of existing units of rent-regulated and loft-law affordable housing in the neighborhood, disproportionately occupied by lower-income, senior, artist, and Asian American residents, many of whom would be displaced. It will push out arts and any other small businesses with its allowance for giant big-box retail of unlimited size. It will encourage grossly oversized development up to 2.5 times the size current rules allow, and more than 2.5 times the size of average buildings here now. It will encourage the destruction of historic buildings, and allow developers to add luxury condos and apartments with no affordable housing so long as they don't exceed 25,000 sq ft per zoning lot. Even in this relatively wealthy neighborhood, new development even with the 25–30% “affordable” housing will still overall make the neighborhood richer, less diverse, and more expensive, as the new market-rate units would be so expensive and the “affordable” ones unaffordable to even a significant share of residents here.

The City has consistently lied about the impact the rezoning would have and who would be hurt by it. It's the lower-income tenant-renters, artists, seniors, and Chinatown residents who will be most hurt. Neighbors support an alternative plan for real affordable housing without displacement, oversized development, and big-box chain stores. Vote no.

Regards,
Anne Mitcheltree
237 E 5th St
New York, NY 10003

From: [Anne Namm](#)
To: [Land Use Testimony](#)
Subject: [EXTERNAL] Vote No on the SoHo/NoHo/Chinatown Upzoning Plan
Date: Wednesday, November 3, 2021 5:04:27 AM

To the City Council:

I strongly urge the City Council to vote no on the disastrous SoHo/NoHo/Chinatown upzoning plan. This proposal would fulfill none of its affordable-housing promises, as it actually makes it more profitable to build without affordable housing than with. It will create huge incentives for destroying the hundreds of existing units of rent-regulated and loft-law affordable housing in the neighborhood, disproportionately occupied by lower-income, senior, artist, and Asian American residents, many of whom would be displaced. It will push out arts and any other small businesses with its allowance for giant big-box retail of unlimited size. It will encourage grossly oversized development up to 2.5 times the size current rules allow, and more than 2.5 times the size of average buildings here now. It will encourage the destruction of historic buildings, and allow developers to add luxury condos and apartments with no affordable housing so long as they don't exceed 25,000 sq ft per zoning lot. Even in this relatively wealthy neighborhood, new development even with the 25–30% “affordable” housing will still overall make the neighborhood richer, less diverse, and more expensive, as the new market-rate units would be so expensive and the “affordable” ones unaffordable to even a significant share of residents here.

The City has consistently lied about the impact the rezoning would have and who would be hurt by it. It's the lower-income tenant-renters, artists, seniors, and Chinatown residents who will be most hurt. Neighbors support an alternative plan for real affordable housing without displacement, oversized development, and big-box chain stores. Vote no.

Regards,
Anne Namm
875 Park Ave
New York, NY 10075

From: [Anthony Feyer](#)
To: [Land Use Testimony](#)
Subject: [EXTERNAL] To whom this may concern:
Date: Thursday, November 11, 2021 11:42:09 AM

I updated my testimony during the presentation by NYCDPD. On the emblematic statement by one of the presenting bureaucrats: present zoning reserves ground floor use for industrial activities, imposing unbearable burden on development. Industrial? Such as flagship stores by Chanel, Valentino, Burberry, side by side on Spring Street, and Luis Vuitton further up the block?

Obviously there are ways to get around existing zoning, and turn the formerly destined for the wrecking ball small manufacturing artist ghetto into a bling mine: this is precisely why the present zoning should be left as is. But the presenting bureaucrats seem more concerned with flowcharts than walking the neighborhoods they are so hellbent on “de-structuring”.

Residents have accepted the compromise of living in an open air mall, but the greed of the forces that have turned what artists and community organizations saved from Robert Moses' wrecking ball into a commercial carnival, will literally dig out the ground we and they stand on, in pursuit of a bigger profit. They are pushing this evil plan, aided and abetted by the City administration they so skillfully worked and paid for to front for it.

The land grab proceeds in the waning months of the DeBlasio regime, in cahoots with our corrupt representatives in the City Council; the East River Park Destruction, the Governor's Island and Gowanus Canal "rezoning"; the seizing of every square and cubic inch over any lot to make a profit for real estate holders and connected construction companies, while robbing the people of New York City of air, light and what the city economy thrives on, neighborhoods diversity, which turns each New Yorker into a spending scholar-tourist, while learning about our diverse cultural history.

if this wretched plan is allowed to proceed, in a few years Soho and Noho won't look or feel any different from Midtown Manhattan. Is this what we want our city to become? The City Council has a responsibility to the people of our great city and to History. Don't kill the arts, culture, and the human resources of long timers like me (40 years in the neighborhood) which makes us, collectively as a city, what we are; and don't buy in the astro-turfing pretenses of encouraging diversity: they are just that, no matter how fancy the sheeps clothing. For a long time, green has been the only color that allows newcomers to the area, and this plan will cement the trend. I entreat you to Vote NO and consign this aberration to the dustbin of history.

Sincerely, Anthony Feyer



<http://www.anthonysteyer.com>

From: [Antonia Batalias](#)
To: [Land Use Testimony](#)
Subject: [EXTERNAL] Vote No on the SoHo/NoHo/Chinatown Upzoning Plan
Date: Thursday, November 11, 2021 9:33:21 PM

To the City Council:

I strongly urge the City Council to vote no on the disastrous SoHo/NoHo/Chinatown upzoning plan. This proposal would fulfill none of its affordable-housing promises, as it actually makes it more profitable to build without affordable housing than with. It will create huge incentives for destroying the hundreds of existing units of rent-regulated and loft-law affordable housing in the neighborhood, disproportionately occupied by lower-income, senior, artist, and Asian American residents, many of whom would be displaced. It will push out arts and any other small businesses with its allowance for giant big-box retail of unlimited size. It will encourage grossly oversized development up to 2.5 times the size current rules allow, and more than 2.5 times the size of average buildings here now. It will encourage the destruction of historic buildings, and allow developers to add luxury condos and apartments with no affordable housing so long as they don't exceed 25,000 sq ft per zoning lot. Even in this relatively wealthy neighborhood, new development even with the 25–30% “affordable” housing will still overall make the neighborhood richer, less diverse, and more expensive, as the new market-rate units would be so expensive and the “affordable” ones unaffordable to even a significant share of residents here.

The City has consistently lied about the impact the rezoning would have and who would be hurt by it. It's the lower-income tenant-renters, artists, seniors, and Chinatown residents who will be most hurt. Neighbors support an alternative plan for real affordable housing without displacement, oversized development, and big-box chain stores. Vote no.

Regards,
Antonia Batalias
40 King St
New York, NY 10014

Dear Councilmembers:

My wife and I are fortunate to have lived in SoHo for 31 years. I am a practicing artist who needs the space that lofts provide in order to do my work. We were able to buy our loft in 1989 at an affordable price only because our co-op has been strict about maintaining the requirement that loft purchasers be working artists. We raised our two sons here, and our lives are here. In 2012, our coop, Prince Lower Fifth Realty Corp., finally completed the multi-year, expensive project of obtaining a Joint Live/Working Quarters for Artists (JWLQA) certificate of occupancy. As part of that process, we had to prove to the Department of Buildings that the owners met all zoning requirements, including artist certification.

SoHo is a beautiful historic neighborhood that is now under siege, threatened with destruction by Mayor de Blasio's up zoning plan. My wife and I attended many of the meetings to which community members were invited to voice our concerns for our neighborhood. It was apparent from the beginning that we were up against a powerful adversary. For example, it soon became clear that the lead planner from the Department of City Planning (DCP) had predetermined to change to change SoHo's zoning. She used the term "odious zoning restrictions" to describe the current zoning. The community attendees, which included numerous professional artists residing in SoHo/NoHo, were asked to use colored pencils and markers to fill in boxes on large sheets of poster board to show what our priorities and concerns were. It was a demeaning, infantilizing activity, treating us like a kindergarten class. It reduced our concerns to buzzwords, with the faint illusion that we were participating in a collaboration.

There was extensive discussion, initiated by DCP, of broadening the definition of "artist" in SoHo's zoning to include additional, creative "makers." At no point was there any suggestion that the zoning might be changed to eliminate the JLWQA certificate of occupancy.

In retrospect, the entire process was a sham. DCP assumed without conducting an actual door to door survey of building occupants, that SoHo is no longer occupied by artists. Indeed, the same DCP lead planner described SoHo/NoHo artist residents as "relics" at a well documented public meeting. In the end, all of the SoHo artist residents' priorities were ignored in the final DCP report, which reads as a wish list for major real estate developers in total disregard of the community that made this neighborhood a cultural mecca.

Instead of rewarding property owners, such as our coop, and loft tenants who complied with SoHo's current zoning requirements and thus followed the law, the DCP's upzoning plan punishes artist owners by imposing an onerous conversion fee, or flip tax, of \$100 per square foot flip tax for conversion to residential use when a JLWQA loft is sold. It also requires that the certificates of occupancy of buildings with rental units under the Loft Law be converted from JLWQA to purely residential use, which is expected to result in displacement of the artist tenants in those buildings. A fairer way to treat owners and tenants in buildings with JLWQA certificates of occupancy would have been to grandfather us into any new zoning. But the developers clearly want us out. In this respect, the flip tax is imposed under the nebulous guise that the monies will somehow be used to support arts organizations. It is a mocking, mean spirited and punitive measure against long time SoHo artist owners who dutifully complied with the law at great expense and effort. It also stands in clear contrast to DCP's outrageous generosity and giveaways to huge real estate developers, from free air rights to massively increased building sizes.

The proposed zoning will result in canyons of luxury glass towers. Big box stores, NYU dorms, huge bars, restaurants and clubs will dominate the business landscape, forever changing the character of SoHo. What will happen to the small, unique businesses that have always characterized SoHo if the up zoning is passed? The answer is likely nothing good.

Further, the promise of affordable housing in DCP's Plan is illusory and disingenuous. As the Greenwich Village Society for Preservation has demonstrated, landlords will be motivated to choose to develop commercial buildings rather than residential buildings because of the greater FAR permitted. And DCP's Plan is replete with loopholes for developers, including the ability to demolish smaller buildings to obtain greater FARS and to pretend to retain the exteriors of historical buildings only to turn around and find that the buildings must be demolished because of dangerous conditions created by the developers. Currently, 29 buildings within the SoHo National Historic District are slated for demolition. See <https://tinyurl/ymur44zb>. Our community is not opposing DCP's plan out of NIMBY concerns and racism, as the developers would have you believe. Indeed, our community has issued and supports the Community Alternative Zoning Plan, see villagepreservation.org/sohonohoplan, which, if adopted, would result in more affordable affordable housing and greater diversity than DCP's plan.

If the DCP Plan is adopted, property values will inflate from luxury development, wealth of developers will soar, and real estate taxes, which are already exceedingly high for artists, will soar in tandem, driving out current artist residents. Moreover, the magnitude and years of construction would impose an intolerably dangerous level of air, and ear shattering noise, pollution. Is it any wonder that the LPC was excluded from the planning meetings and that SoHo/ NoHo residents and our Community Board have rejected the arrogant, pro-developer plan that Mayor de Blasio and his DCP are trying to impose?

We urge you to listen to the residents of SoHo and NoHo and our Community Board, and vote "No" to this destructive upzoning proposal.

Sincerely,
Arthur Cohen and Rosalie Hronsky
435 West Broadway
New York, NY 10012
November 9, 2021

From: [Brad Hargreaves](#)
To: [Land Use Testimony](#)
Subject: [EXTERNAL] Testimony in support of SoHo rezoning
Date: Friday, November 12, 2021 10:42:03 AM

To whom it may concern,

My name is Brad Hargreaves and I am a long-time lower Manhattan resident and homeowner, where I live with my wife and two young children who attend public school in the neighborhood. I am also a local business owner, having started the technology trade school General Assembly in lower Manhattan in 2010.

I am writing to express my strong support of the SoHo/NoHo rezoning—New York badly needs more mixed-income housing, and SoHo and NoHo are precisely the kinds of high-opportunity, transit-rich neighborhoods where it ought to be built.

I am incredibly fortunate to live in lower Manhattan, which I consider to be one of the best places on this planet. It is the least we can do to invite more people to share in this wonderful opportunity.

Thank you for considering my written testimony.

yours,
Brad Hargreaves

From: [Bryan Ludwig](#)
To: [Land Use Testimony](#)
Subject: [EXTERNAL] Vote No on the SoHo/NoHo/Chinatown Upzoning Plan
Date: Wednesday, November 3, 2021 4:52:03 AM

To the City Council:

I strongly urge the City Council to vote no on the disastrous SoHo/NoHo/Chinatown upzoning plan. This proposal would fulfill none of its affordable-housing promises, as it actually makes it more profitable to build without affordable housing than with. It will create huge incentives for destroying the hundreds of existing units of rent-regulated and loft-law affordable housing in the neighborhood, disproportionately occupied by lower-income, senior, artist, and Asian American residents, many of whom would be displaced. It will push out arts and any other small businesses with its allowance for giant big-box retail of unlimited size. It will encourage grossly oversized development up to 2.5 times the size current rules allow, and more than 2.5 times the size of average buildings here now. It will encourage the destruction of historic buildings, and allow developers to add luxury condos and apartments with no affordable housing so long as they don't exceed 25,000 sq ft per zoning lot. Even in this relatively wealthy neighborhood, new development even with the 25–30% “affordable” housing will still overall make the neighborhood richer, less diverse, and more expensive, as the new market-rate units would be so expensive and the “affordable” ones unaffordable to even a significant share of residents here.

The City has consistently lied about the impact the rezoning would have and who would be hurt by it. It's the lower-income tenant-renters, artists, seniors, and Chinatown residents who will be most hurt. Neighbors support an alternative plan for real affordable housing without displacement, oversized development, and big-box chain stores. Vote no.

Regards,
Bryan Ludwig
712 Broadway
New York, NY 10003

From: [C. Pyle](#)
To: [Land Use Testimony](#)
Subject: [EXTERNAL] Vote No on the SoHo/NoHo/Chinatown Upzoning Plan
Date: Thursday, November 11, 2021 2:19:21 PM

To the City Council:

I strongly urge the City Council to vote no on the disastrous SoHo/NoHo/Chinatown upzoning plan. This proposal would fulfill none of its affordable-housing promises, as it actually makes it more profitable to build without affordable housing than with. It will create huge incentives for destroying the hundreds of existing units of rent-regulated and loft-law affordable housing in the neighborhood, disproportionately occupied by lower-income, senior, artist, and Asian American residents, many of whom would be displaced. It will push out arts and any other small businesses with its allowance for giant big-box retail of unlimited size. It will encourage grossly oversized development up to 2.5 times the size current rules allow, and more than 2.5 times the size of average buildings here now. It will encourage the destruction of historic buildings, and allow developers to add luxury condos and apartments with no affordable housing so long as they don't exceed 25,000 sq ft per zoning lot. Even in this relatively wealthy neighborhood, new development even with the 25–30% “affordable” housing will still overall make the neighborhood richer, less diverse, and more expensive, as the new market-rate units would be so expensive and the “affordable” ones unaffordable to even a significant share of residents here.

The City has consistently lied about the impact the rezoning would have and who would be hurt by it. It's the lower-income tenant-renters, artists, seniors, and Chinatown residents who will be most hurt. Neighbors support an alternative plan for real affordable housing without displacement, oversized development, and big-box chain stores. Vote no.

Regards,
C. Pyle
470 West End Ave
New York, NY 10024

From: [C. Pyle](#)
To: [Land Use Testimony](#)
Subject: [EXTERNAL] Vote NO on the SoHo/NoHo/Chinatown Upzoning Plan
Date: Friday, November 12, 2021 4:37:05 AM

To the City Council:

The SoHo/NoHo and Chinatown neighborhoods of Manhattan are two of the few remaining zones of Character in our City. Too many such unique neighborhoods have been decimated in the past century by the special real estate interests -- interested only in themselves and their monetary profits -- who have had far too much influence on our mayors and on City Government. This is Corruption. It must not be condoned.

I, a born Manhattanite, see our City losing its heritage and its former beauty to anodyne glass boxes of extreme height, built only for the rich, who do not even live here or pay taxes!

I insist that the City Council work for us, the People of New York, and vote NO on the disastrous SoHo/NoHo/Chinatown upzoning plan.

This proposal would fulfill none of its affordable-housing promises for the People of New York, as it actually makes it more profitable to build without affordable housing than with. It will create huge incentives for destroying the hundreds of existing units of rent-regulated and loft-law affordable housing in the neighborhood, disproportionately occupied by lower-income, senior, artist, and Asian American residents, many of whom would be displaced.

It will push out arts and any other small businesses with its allowance for giant big-box retail of unlimited size. It will encourage grossly oversized development up to 2.5 times the size current rules allow, and more than 2.5 times the size of average buildings here now. It will encourage the destruction of historic buildings, and allow developers to add luxury condos and apartments with no affordable housing so long as they do not exceed 25,000 sq ft per zoning lot.

Even in this relatively wealthy neighborhood, new development even with the 25–30% “affordable” housing will still make the neighborhood richer over all, less diverse, and more expensive, as the new market-rate units would be so expensive and the “affordable” ones unaffordable to a significantly large number of residents here.

The City has consistently avoided exposing the truth about the impact the rezoning would have and who would be hurt by it. It is the lower-income tenant-renters, artists, seniors, and Chinatown residents who will be most hurt. Neighbors support an alternative plan for real affordable housing without displacement, oversized development, and big-box chain stores.

Vote NO for the Good of our Great City.

Regards,
C. Pyle
470 West End Ave

New York, NY 10024

From: [Carol Kino](#)
To: [Land Use Testimony](#)
Subject: [EXTERNAL] Vote No on the SoHo/NoHo/Chinatown Upzoning Plan
Date: Thursday, November 11, 2021 12:31:16 PM

To the City Council:

I strongly urge the City Council to vote no on the disastrous SoHo/NoHo/Chinatown upzoning plan. This proposal would fulfill none of its affordable-housing promises, as it actually makes it more profitable to build without affordable housing than with. It will create huge incentives for destroying the hundreds of existing units of rent-regulated and loft-law affordable housing in the neighborhood, disproportionately occupied by lower-income, senior, artist, and Asian American residents, many of whom would be displaced. It will push out arts and any other small businesses with its allowance for giant big-box retail of unlimited size. It will encourage grossly oversized development up to 2.5 times the size current rules allow, and more than 2.5 times the size of average buildings here now. It will encourage the destruction of historic buildings, and allow developers to add luxury condos and apartments with no affordable housing so long as they don't exceed 25,000 sq ft per zoning lot. Even in this relatively wealthy neighborhood, new development even with the 25–30% “affordable” housing will still overall make the neighborhood richer, less diverse, and more expensive, as the new market-rate units would be so expensive and the “affordable” ones unaffordable to even a significant share of residents here.

The City has consistently lied about the impact the rezoning would have and who would be hurt by it. It's the lower-income tenant-renters, artists, seniors, and Chinatown residents who will be most hurt. Neighbors support an alternative plan for real affordable housing without displacement, oversized development, and big-box chain stores. Vote no.

c

Regards,
Carol Kino
14 Horatio St
New York, NY 10014

From: [Carol Steinberg](#)
To: [Land Use Testimony](#)
Subject: [EXTERNAL] Vote No on the SoHo/NoHo/Chinatown Upzoning Plan
Date: Wednesday, November 3, 2021 1:19:45 AM

To the City Council:

I strongly urge the City Council to vote no on the disastrous SoHo/NoHo/Chinatown upzoning plan. This proposal would fulfill none of its affordable-housing promises, as it actually makes it more profitable to build without affordable housing than with. It will create huge incentives for destroying the hundreds of existing units of rent-regulated and loft-law affordable housing in the neighborhood, disproportionately occupied by lower-income, senior, artist, and Asian American residents, many of whom would be displaced. It will push out arts and any other small businesses with its allowance for giant big-box retail of unlimited size. It will encourage grossly oversized development up to 2.5 times the size current rules allow, and more than 2.5 times the size of average buildings here now. It will encourage the destruction of historic buildings, and allow developers to add luxury condos and apartments with no affordable housing so long as they don't exceed 25,000 sq ft per zoning lot. Even in this relatively wealthy neighborhood, new development even with the 25–30% “affordable” housing will still overall make the neighborhood richer, less diverse, and more expensive, as the new market-rate units would be so expensive and the “affordable” ones unaffordable to even a significant share of residents here.

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Regards,
Carol Steinberg
700 Columbus Ave
New York, NY 10025

From: [Carolyn Goldhush](#)
To: [Land Use Testimony](#)
Subject: [EXTERNAL] Vote No on the SoHo/NoHo/Chinatown Upzoning Plan
Date: Friday, November 12, 2021 7:01:21 AM

To the City Council:

I strongly urge the City Council to vote no on the disastrous SoHo/NoHo/Chinatown upzoning plan. This proposal would fulfill none of its affordable-housing promises, as it actually makes it more profitable to build without affordable housing than with. It will create huge incentives for destroying the hundreds of existing units of rent-regulated and loft-law affordable housing in the neighborhood, disproportionately occupied by lower-income, senior, artist, and Asian American residents, many of whom would be displaced. It will push out arts and any other small businesses with its allowance for giant big-box retail of unlimited size. It will encourage grossly oversized development up to 2.5 times the size current rules allow, and more than 2.5 times the size of average buildings here now. It will encourage the destruction of historic buildings, and allow developers to add luxury condos and apartments with no affordable housing so long as they don't exceed 25,000 sq ft per zoning lot. Even in this relatively wealthy neighborhood, new development even with the 25–30% “affordable” housing will still overall make the neighborhood richer, less diverse, and more expensive, as the new market-rate units would be so expensive and the “affordable” ones unaffordable to even a significant share of residents here.

The City has consistently lied about the impact the rezoning would have and who would be hurt by it. It's the lower-income tenant-renters, artists, seniors, and Chinatown residents who will be most hurt. Neighbors support an alternative plan for real affordable housing without displacement, oversized development, and big-box chain stores. Vote no.

Regards,
Carolyn Goldhush
55 W 14th St
New York, NY 10011

From: [Casey Collins](#)
To: [Land Use Testimony](#)
Subject: [EXTERNAL] Vote No on the SoHo/NoHo/Chinatown Upzoning Plan
Date: Wednesday, November 3, 2021 1:38:58 AM

To the City Council:

I strongly urge the City Council to vote no on the disastrous SoHo/NoHo/Chinatown upzoning plan. This proposal would fulfill none of its affordable-housing promises, as it actually makes it more profitable to build without affordable housing than with. It will create huge incentives for destroying the hundreds of existing units of rent-regulated and loft-law affordable housing in the neighborhood, disproportionately occupied by lower-income, senior, artist, and Asian American residents, many of whom would be displaced. It will push out arts and any other small businesses with its allowance for giant big-box retail of unlimited size. It will encourage grossly oversized development up to 2.5 times the size current rules allow, and more than 2.5 times the size of average buildings here now. It will encourage the destruction of historic buildings, and allow developers to add luxury condos and apartments with no affordable housing so long as they don't exceed 25,000 sq ft per zoning lot. Even in this relatively wealthy neighborhood, new development even with the 25–30% “affordable” housing will still overall make the neighborhood richer, less diverse, and more expensive, as the new market-rate units would be so expensive and the “affordable” ones unaffordable to even a significant share of residents here.

The City has consistently lied about the impact the rezoning would have and who would be hurt by it. It's the lower-income tenant-renters, artists, seniors, and Chinatown residents who will be most hurt. Neighbors support an alternative plan for real affordable housing without displacement, oversized development, and big-box chain stores. Vote no.

Regards,
Casey Collins
712 Broadway
New York, NY 10003

From: [Charles Soll](#)
To: [Land Use Testimony](#)
Subject: [EXTERNAL] NoHo resident in support of rezoning
Date: Friday, November 12, 2021 10:39:29 AM

Hi, my name is Charles Soll and I am a resident of NoHo, living on Bowery between Bond and Great Jones.

I am writing to express my strong support of the SoHo/NoHo rezoning—New York badly needs more mixed-income housing, and SoHo and NoHo are precisely the kinds of high-opportunity, transit-rich neighborhoods where it ought to be built.

I would also ask the City Council to make two changes to the plan—while I support the added density for housing, its proposed commercial densities are too high. There is a risk that developers will choose to build only office space, as offices could be leased at wholly market-rates, and would not need to provide affordable housing.

I also believe the City should change its community preference policy for this rezoning, to allow residents of the Lower East Side and Chinatown, or the City more broadly, to have equal access to the affordable apartments as would residents of Community Board 2.

Lastly, I would ask the City Council to require the deepest possible level of affordability for the below-market apartments. I hope this rezoning can be a force for racial and socioeconomic integration in two of Manhattan's most segregated neighborhoods, and ensuring subsidized apartments are affordable to the income brackets where they are most sorely needed would go a long way towards doing so.

Thank you for considering my written testimony.

Sincerely,

Charles

From: [Christopher Cahill](#)
To: [Land Use Testimony](#)
Subject: [EXTERNAL] Rezoning
Date: Wednesday, November 10, 2021 9:41:23 PM

Hi, hope you're doing well.

I am concerned with the Gowanus Rezoning EIS using outdated rainfall and flood data. I agree with Rep. Velazquez that we should redo the EIS with new data.

I also am uncomfortable with all of the 100% affordable housing going on a lot with such a toxic history and uncertain remediation. The worst case scenario is effectively rolling the dice on the lives of poor people (who will already be living in a flood zone, as much of the Gowanus Rezoning area is).

Furthermore, given the state of NYC's real estate market (incredibly expensive, healthily growing), why is the city paying \$200,000,000 for NYCHA repairs so that real estate developers can develop properties that won't pay property taxes for years? It seems incredibly backwards. We should be collecting taxes on the developers!

Of course, on top of all of this, it goes without being said -- Gowanus is by definition at risk of flooding, and we'd be placing the most new residents at highest risk closest to the water -- just like in the Lower East Side by One Manhattan Square, just like in Long Island City, Dumbo, Greenpoint, Hudson Square, new development by South St. Seaport. This is a laughingly unsustainable strategy.

For SoHo/NoHo, the only point I'd like to make is that we have an extremely lopsided way of looking at these rezonings. All of this energy is being poured into the SoHo/NoHo rezoning for 3000 total apartments, of which 900 are projected to be affordable. Given the absolutely minuscule percentage of New York's overall housing supply that is, it is likely to make no impact on overall housing affordability. Whatsoever. Most poor people cannot afford AMI around SoHo/NoHo. There is little compelling 'social benevolence' factor for this rezoning. The 900 affordable housing number is a red herring at best or outright deceit at worst. Yet all of this energy is being poured into it because this area is lucrative -- given that this is the most expensive real estate in the world, the city should ensure it gets everything its citizens want in the SoHo/NoHo rezoning. Lower FAR, historic protections. There's no reason to give anything away; we're not getting much in return.

Best,
Chris

From: [Chris Goode](#)
To: [Land Use Testimony](#)
Subject: [EXTERNAL] Rezoning support from a long time Soho resident
Date: Wednesday, November 10, 2021 11:07:09 AM

City Council Members,

I first moved to Soho in 1978. For the past 20 years I have owned my current home at the Chinatown edge of Soho. My daughter attended PS 130 on Baxter Street. I am a longtime volunteer with Visiting Neighbors an organization which helps local seniors age in place. I am writing you today as an advocate for housing. Like most Soho homeowners the value of my property has skyrocketed over the years, but unlike the opposition, I support this rezoning because I think a diverse and equitable neighborhood is more important than ever higher real estate values.

I would like to rebut some of the claims regarding my immediate neighborhood, the East Soho/ Chinatown part of the rezoning. First, the area between Baxter and Lafayette Streets south of Grand Street is already gentrified. As evidenced by the 60, multimillion dollar, condos on these few blocks. Four hotels have been built and more recently, the remaining large manufacturing buildings have all been converted to expensive office space. Second, this area's 13 small, tenant protected buildings are not at risk of demolition or resident displacement. Not only were tenant protections strengthened in 2019, but because of the small footprints of these buildings new development on these sites has never made economic sense. Despite this area's past 20 years of intense gentrification not a single renter protected building has been demolished for new development of any kind in this area.

The new zoning will allow for the residential development of this area's few vacant lots and underutilized one and two story commercial buildings. These sites were too small for hotel or office development, so they will now be available sites for housing. We will get market rate housing, which helps to reduce the gentrification pressure on less wealthy neighborhoods including Chinatown. Additionally, we will all benefit from new affordable apartments being added to the neighborhood. Unfortunately, the major flaw to this rezoning is that the few large developable sites will probably end up as offices since this use continues to more profitable than housing.

This controversy is all about real estate, but in this case big real estate are not the developers, big real estate are the Soho co-op owners who are hooked on the endless rise of their property values. Please do not buy into the displacement and gentrification smokescreens being put forth by the same individuals and groups who have been fighting affordable housing such as Haven Green. I ask that you approve this rezoning, but please require the removal of neighborhood preference for the affordable units. These units should be made available to all city residents who qualify.

Thank you,

Christopher Goode

646-337-8824

**CHUCK DELANEY
76 PEARL STREET
NEW YORK, NY 10004**

[REDACTED]
CHUCKDELANEY@GMAIL.COM

November 11, 2021

Honorable Margaret Chin
New York City Council District 1

Honorable Carlina Rivera
New York City Council District 2

Honorable Corey Johnson, Speaker
New York City Council District 3

Re: Written Testimony regarding proposed SoHo NoHo rezoning

Greetings Councilmembers Chin, Rivera, and Johnson,

To supplement my testimony delivered on November 9 at the Subcommittee on Zoning and Franchises, please accept this written testimony.

I am convinced that the current proposed rezoning put forth by the City Planning Commission must be rejected outright at this time. There are simply too many open questions and unresolved issues to permit the City Council to move forward on this incomplete and insufficiently analyzed proposal. While it's not actually in the Hippocratic Oath, the saying, "First Do No Harm" is central to the tenets of medicine. It should apply to legislative affairs as well.

Among the open questions and unresolved issues are these:

- How will this proposal affect adjacent neighborhoods including Chinatown?
- What benefit, if any, will the imposition of a conversion tax bring to the process?
- Who will benefit from the "Artist Fund?" Who will administer it? What is its purpose?
- Are tenant protections sufficient to actually prevent harassment and eviction-through-demolition for loft IMD units, former loft IMD units that are now rent stabilized, and other rent stabilized units, as CPC claims?
- Will any housing be created? If so, will any of it be affordable?

- How does the proposed new law introduced by CM Chin on November 8 fit into the mix? Noted in the press as ‘Throwing a new twist into the Soho/NoHo rezoning very late in the game’ (Lincoln Anderson, *Village Sun*), why was this not the subject of discussion earlier?

There are many more open questions. So many, in fact, that to try to cobble together some type of “compromise” between the current CPC proposal and concerns that have hopefully registered with Council members without restarting the process with a revised proposal and open discussion with community members and other stakeholders is unconscionable.

I believe there is a way forward that would update the zoning in SoHo and NoHo and also create new and genuinely affordable housing. The “community plan” that has been advanced contains some interesting ideas. I would also highly recommend that Council members and staff look closely at the written testimony submitted by SoHo resident Alexandr Neratoff, who is also an architect and who has put extensive time into reviewing this proposal.

In closing, I would like to point out that Alexandr Neratoff graciously volunteered to serve as my alternate in the many, many Advisory Group meetings that were held. The entire Advisory Group process, while interesting in concept, led to a report that has been largely ignored in the current CPC proposal. The SoHo/NoHo community, the citizens of and visitors to New York City, and the spirit and intent of city planning deserve better. Please reject this proposal. Working together, the interested parties can do far better than anything that will could be hurriedly negotiated over the next few weeks. In fact, there is little reason to rush, and, given the high probability of unexpected and disastrous outcomes, every reason to reconsider and reevaluate.

I have also appended my testimony that was presented at the November 9 hearing.

Very truly yours,

Chuck DeLaney

Testimony delivered by Chuck DeLaney to the City Council Land Use Subcommittee on Zoning and Franchises:

The City Planning Commission's proposed SoHo/NoHo rezoning is a terrible idea. Overwhelmingly rejected by Manhattan Community Board Two, and criticized by Borough President Brewer, I know others will testify to many reasons that the Council should reject this proposal. Adopting it will cause irreparable harm to these unique neighborhoods. Hell's Hundred Acres, as SoHo was once known, was pioneered for residential use by artists and fellow travelers in the 1960s and 70s. The best option is to reject this proposal and start over.

The damaging aspect of this proposal I want to highlight is the danger to loft tenants and other low- and moderate-income tenants in SoHo, NoHo, and adjoining neighborhoods, particularly Chinatown. As one of the four founders of Lower Manhattan Loft Tenants in the 1970s, and as the tenant representative on the New York City Loft Board, I have been in many loft units in SoHo and NoHo over the years. If adopted, this proposal would put many residential buildings at risk of demolition.

For the record, I must note that I am not providing this testimony on behalf of the Loft Board. Rather, as a longtime tenant organizer, I speak on behalf of loft tenants who are being put at risk by this proposal, particularly because the CPC staff that drafted it never comprehended the laws and provisions that protect this unique community and that allowed it to flourish. And indeed, it does flourish.

"There are no artists left in SoHo," then Koch Administration Deputy Mayor Robert Esnard told a group of loft tenants way back in the mid-1980s. That wasn't true then, and it's not true today. However, amid the tourists and shoppers that the artists' presence helped attract to the neighborhood, you have to look for them. But they're there – on Greene Street, Crosby, Broadway, Mercer Street and all through this unique zone. Sadly, City Planning staff made little effort to count them, or calculate the threat their proposal creates for these pioneers. I will submit detailed written testimony. Thank you

From: [Claude Samton](#)
To: [Land Use Testimony](#)
Subject: [EXTERNAL] SoHo Rezoning
Date: Thursday, November 11, 2021 11:17:55 PM

I am a 42 year resident architect and artist in SoHo. I am appaled at the thouught that one of the most beautiful neighborhoods in the city is now under attack by real estate interests. SoHo has gone through many iterations during my time here but it has always maintained its architectural and historical integrity.

It is my hope that the rezoning will be turned down and the character of this special area will be maintained.

Claude Samton
Architect and Artist
84 Mercer Street
[REDACTED]

From: [Constance Dondore](#)
To: [Land Use Testimony](#)
Subject: [EXTERNAL] Vote No on the SoHo/NoHo/Chinatown Upzoning Plan
Date: Friday, November 12, 2021 2:52:40 AM

To the City Council:

I strongly urge the City Council to vote no on the disastrous SoHo/NoHo/Chinatown upzoning plan. This proposal would fulfill none of its affordable-housing promises, as it actually makes it more profitable to build without affordable housing than with. It will create huge incentives for destroying the hundreds of existing units of rent-regulated and loft-law affordable housing in the neighborhood, disproportionately occupied by lower-income, senior, artist, and Asian American residents, many of whom would be displaced. It will push out arts and any other small businesses with its allowance for giant big-box retail of unlimited size. It will encourage grossly oversized development up to 2.5 times the size current rules allow, and more than 2.5 times the size of average buildings here now. It will encourage the destruction of historic buildings, and allow developers to add luxury condos and apartments with no affordable housing so long as they don't exceed 25,000 sq ft per zoning lot. Even in this relatively wealthy neighborhood, new development even with the 25–30% “affordable” housing will still overall make the neighborhood richer, less diverse, and more expensive, as the new market-rate units would be so expensive and the “affordable” ones unaffordable to even a significant share of residents here.

The City has consistently lied about the impact the rezoning would have and who would be hurt by it. It's the lower-income tenant-renters, artists, seniors, and Chinatown residents who will be most hurt. Neighbors support an alternative plan for real affordable housing without displacement, oversized development, and big-box chain stores. Vote no.

Regards,
Constance Dondore
15 Washington Pl
New York, NY 10003

**543 Corporation
543 Broadway
New York NY 10012**

New York City Council
Subcommittee on Zoning and Franchises
landusetestimony@council.nyc.gov

November 10, 2021

Dear Councilmembers,

The co-op board of 543 Corporation (543 Broadway and 114 Mercer Street) is **opposed** to the Department of City Planning's proposed upzoning of SoHo and NoHo. Our JLWQA-designated co-op, in its diversity of ages, people, and income levels, is a microcosm of the SoHo community at large, which has been vilified unfairly throughout the process and reduced as a homogeneous and affluent mass. The building that houses our community was designed and constructed by John W. Stephens as a warehouse structure in 1902-1903 and is located on a notably historic block of early cast iron architecture.

Both the human and structural realities of our building make the residents of our co-op uniquely vulnerable to likely economic harm and displacement should the upzoning plan be approved unchallenged and unchanged. We are particularly dismayed at the lack of clarity around DCP's plan for JLWQA conversion to UG2 General Residential zoning. The cost of bureaucratic paperwork alone would be prohibitive. Our C of O, issued in the 1980's and grandfathered into the last inspection-compliance cycle, will have to be brought up to code at such enormous expense that it may simply break our community's ability to remain here. Big ticket items include energy code and fire suppression compliance, elevator code modernization, documenting (and physically correcting) changes made in each apartment over the decades, and of course, meeting fire safety and means of egress standards. This last issue is of particular concern, as it may render our residential spaces uninhabitable. Even the top four floors of our building, currently above building line, may see their windows covered by future construction if FAR limits are lifted. In that case, every single unit in this coop stands to become unfit for habitation according to city code.

What, then? Will the eighteen families that constitute our community be expected to exit our homes en masse and sell our properties for cheap to real estate speculators, who appear to be the only winners in the DCP's upzoning proposal?

With this letter, we seek to make it demonstrably clear that the trading chips in this game are the homes and livelihoods of working community members. We ask that the rights of the residents of this mixed-use neighborhood, many of which are pioneer artists ageing in place on fixed incomes, be upheld, respected, and taken as seriously as this grave situation demands.

Beyond the specific harm that the upzoning plan stands to inflict upon 543 Corp., **we oppose the general aspects of the proposal which most directly affect co-op shareholders and condo owners. And we stand in deep solidarity with the plight of the many rent-stabilized tenants in our midst:**

- **The city dangles a false “solution” for residents** (aka the “mechanism”) which purports to allow co-op and condo owners to convert JLWQA (Joint-live-work-quarters-for-artists) units into ordinary residential units. The city proposes this as a “pathway to legalization” for residential owners, including those owning co-op and condo units. They also claim this will add resale value to these units. In fact, as we have outlined above, it is nearly impossible to convert most of these buildings to residential as the requirements for C of Os for the two different codes are different

and incompatible. Even where possible, such building conversions would require a **massive outlay of funds — upwards of \$500,000 per unit — plus total evacuation of the building during renovation.**

- **The plan would impose a uniquely punitive and excessively high tax of \$100 per square foot specifically in SoHo, unfairly targeted towards existing residents.** The City says that the money will be used as the sole financing source for a hazily described “Artist Fund.” With so many artists living in SoHo, the community quite literally lives to support the arts. We would prefer that the arts for the entire city to be funded through the city-wide tax base and not on the backs of residents.
- **The plan puts a target on existing rent regulated affordable housing in the neighborhood, including loft board protected tenants,** providing a strong economic incentive for its demolition and the displacement of its residents. The plan greatly increases incentives for, and the likelihood of, harassment of tenants. At great risk are pioneer artists neighbors ageing in place.
- **The plan will encourage the demolition of historic buildings** recognized at the city, state, and federal level. For a visual presentation of 29 buildings slated for demolition or construction in the SoHo National Historic District: <https://tinyurl.com/ymur44zb>
- **The plan would encourage and allow oversized development** in the historic district. It would allow a broad range of uses, especially **big box destination chain retail**, with no community input for special permits. It would introduce into the community **huge NYU dorms** as well as **eating and drinking establishments of unlimited size.**

The residents of 543 Corp. participated actively and in good faith in the Envision SoHo/NoHo community planning process that started in 2019. It is evident that very few of the concerns raised during the process were taken into consideration by DCP, which decided to move forward indifferent and undeterred. Under the pretext of affordable housing, it seems clear that DCP and Mayor de Blasio's administration are desperately pushing a plan favoring real estate developers and large commercial interests to the detriment of existing residents and small businesses. **It seems evident that the plan's success rests on the obliteration of SoHo and NoHo's residential communities.**

Approving this sweeping proposal, especially in the final days of the administration of Mayor de Blasio, who will not be held responsible for its abuses, will further impair much more than our quality of life. It will violate our right to reside here, decimate our historic neighborhood, and provide **no community benefits.**

Members of 543 Corp. participated in the crafting of the Community Alternative Plan (<https://media.villagepreservation.org/wp-content/uploads/2020/12/14233438/SoHo-NoHo-revised.pdf>), which addresses the real issues of housing cost and availability, commercial interests, and more without the destructive choices espoused by DCP's proposal.

Please vote to SAVE SOHO-NOHO.

Sincerely,

The 543 Corporation Board of Directors

Testimony to the New York City Council on the SoHo/NoHo Rezoning

Dear Councilmembers,

I write in full support of the SoHo/NoHo rezoning. New York City faces a severe housing shortage that is pricing out non-wealthy New Yorkers and preventing countless others from moving to a city that proclaims it welcomes immigrants, refugees, and all those who seek a better life. Tragically, our housing shortage is fundamentally undermining these values. The most important part of this solution is obvious: more housing.

Expanding the number of housing units, therefore, must be a citywide priority, but SoHo/NoHo serve as Exhibit A for neighborhoods that must be required to do their part. **While many of the past rezonings have focused on low-income communities of color, SoHo/NoHo – two of the richest neighborhoods on the planet – have kept their door shut through supply restrictions that have caused the cost of housing to skyrocket.**

The rezoning, of course, won't make SoHo/NoHo housing suddenly inexpensive, but it will allow thousands of families to access these high-opportunity neighborhoods crisscrossed by one of the densest network of public transit anywhere. And the addition of 900 affordable housing units is a critical step in the right direction. SoHo/NoHo are over three-quarters white, while the city is nearly 70% non-white. The current zoning, which was put in place in 1971, reinforces these inequities. Fifty years of the current exclusionary zoning should not be allowed to continue.

The rezoning is also an important step towards reducing our society's broader carbon emissions, an urgent priority for all those who care about Earth's future. Because those living in the rezoning area can easily do so without a car, new residents will have significantly less climate impact than they would otherwise; New Yorkers' carbon footprint is nearly one-third less than other Americans.

While the rezoning should be approved, two steps could improve it further. First, the city should lower commercial densities. Office developers are not required to cross-subsidize affordable housing, so reducing commercial densities will help support affordable housing. Second, while community preference is usually justified, Manhattan CB2 is so wealthy that the most likely people to qualify for affordable housing in this district are young people from privileged backgrounds. Thus, community preference should be expanded beyond CB2 residents to include area workers or residents of the council district.

For the reasons above, I urge councilmembers to support the SoHo/NoHo rezoning.

Sincerely,
David Lloyd
389 Douglass St.
Apt. ■
Brooklyn, NY 11217

From: [David Morehouse](#)
To: [Land Use Testimony](#)
Subject: [EXTERNAL] Vote No on the SoHo/NoHo/Chinatown Upzoning Plan
Date: Wednesday, November 10, 2021 3:33:29 PM

To the City Council:

Dear Mr Rivera,
Dia Art Foundation has operated two galleries in SoHo for more than 40 years. We are for affordable housing but against the rezoning plan as it stands.
Big box retail and restaurants will put pressure on small, creative businesses and local shops. No affordable housing is mandated while many high-end residential buildings will go up. Resulting gentrification will result in the loss of affordable housing as smaller buildings are sold to developers.

The artist living quarters zoning is an essential part of the neighborhood.
The resulting new buildings will irreparably destroy the special character of the neighborhood.
Please vote against this measure.

Thank you.

Best,
Rachel

The City has consistently lied about the impact the rezoning would have and who would be hurt by it. It's the lower-income tenant-renters, artists, seniors, and Chinatown residents who will be most hurt. Neighbors support an alternative plan for real affordable housing without displacement, oversized development, and big-box chain stores. Vote no.

Regards,
David Morehouse
172 E 4th St
New York, NY 10009

From: [DAVID SHELDON](#)
To: [Land Use Testimony](#)
Subject: [EXTERNAL] SoHo/NoHo/Chinatown rezoning
Date: Wednesday, November 10, 2021 1:30:51 PM

My name is David Sheldon. I am a Manhattan resident now for 50 years. I was not here when Robert Moses promoted the construction of an expressway across lower Manhattan where Broome Street still stands today. It was to provide solutions for the pressing needs of the neighborhood and of the City. It was widely promoted, it was politically connected, and it was to produce the cure for all our problems, including, yes, housing.

It was defeated. None the less, the neighborhoods along the route and lower Manhattan survived! Residents of SoHo/NoHo/Chinatown don't seem to miss this expressway much. Those of us who visit, have business in, or just pass through the neighborhood are very glad to find no expressway there. Visitors to our City enjoy the area and are perhaps unaware of how close we came to losing it.

Why would we now throw away what we are so fortunate to have saved?

Is it a mistake to think that our elected representatives on this council will protect what we value?

Are we wrong to expect that our own city government shares the respect and affection that New Yorkers have for their neighborhoods, for this neighborhood?

What other interest could supersede that of standing for the preservation of this cherished portion of our City?

In closing, I want to note an Orwellian phenomenon in this hearing. Many speaking in favor of this new zoning, and for the developers lined up behind it, present themselves as speaking for the poor and dis-enfranchised. Poor and disenfranchised developers? Not in this town, not in this life. Is it that we are to accept a replay of trickle-down economics embodied now in re-zoning proposals and high-rise architecture? No, thank you.

But now those of us resisting this onslaught are to be associated with the wealthy and elite. I am not a member of either caste, but I stand with millions of other working New Yorkers, of every stripe to be found here, united in the conviction that this is still our city, and we will not give up another inch of it if we can help it, not without a fight!

Thank you.

Sent from [Mail](#) for Windows

From: [David Stoll](#)
To: [Land Use Testimony](#)
Subject: [EXTERNAL] Vote No on the SoHo/NoHo/Chinatown Upzoning Plan
Date: Thursday, November 11, 2021 1:22:09 PM

To the City Council:

I strongly urge the City Council to vote no on the disastrous SoHo/NoHo/Chinatown upzoning plan. This proposal would fulfill none of its affordable-housing promises, as it actually makes it more profitable to build without affordable housing than with. It will create huge incentives for destroying the hundreds of existing units of rent-regulated and loft-law affordable housing in the neighborhood, disproportionately occupied by lower-income, senior, artist, and Asian American residents, many of whom would be displaced. It will push out arts and any other small businesses with its allowance for giant big-box retail of unlimited size. It will encourage grossly oversized development up to 2.5 times the size current rules allow, and more than 2.5 times the size of average buildings here now. It will encourage the destruction of historic buildings, and allow developers to add luxury condos and apartments with no affordable housing so long as they don't exceed 25,000 sq ft per zoning lot. Even in this relatively wealthy neighborhood, new development even with the 25–30% “affordable” housing will still overall make the neighborhood richer, less diverse, and more expensive, as the new market-rate units would be so expensive and the “affordable” ones unaffordable to even a significant share of residents here.

The City has consistently lied about the impact the rezoning would have and who would be hurt by it. It's the lower-income tenant-renters, artists, seniors, and Chinatown residents who will be most hurt. Neighbors support an alternative plan for real affordable housing without displacement, oversized development, and big-box chain stores. Vote no.

Regards,
David Stoll
1140 5th Ave
New York, NY 10128

From: [Dice O](#)
To: [Land Use Testimony](#)
Subject: [EXTERNAL] IN SUPPORT of SoHo rezoning
Date: Wednesday, November 10, 2021 10:17:24 AM

I would like to write in support of the NYC Planning staff's recommendation to rezone SoHo for mixed-income housing. The entire NYC region suffers from a massive housing shortage by evidenced by high rents, low residential vacancies, rising homelessness, rising home prices, and out-migration of young people and renters. We desperately need significant growth in the housing stock to meet demand.

The rezoning opponents' arguments are based almost entirely on selfish or parochial interests (appeals to aesthetics, desire to preserve their own property values or views, and dislike of newcomers). Our nation's economic and social welfare cannot and should not be held hostage by NIMBYism and the desire of a few politically connected homeowners to avoid physical change in the built environment. Cities must grow to accommodate the next generation, not just cater to the whims of today's comfortable elites. I urge you to support the rezoning and other efforts to expand NYC's housing supply.

Thank you
Dice Oh

From: [D WILSON](#)
To: [Land Use Testimony](#)
Subject: [EXTERNAL] STOP THE INSANITY: new development/zoning in SoHo, NoHo, Chinatown
Date: Thursday, November 11, 2021 3:36:29 PM

The plans for these Historic Districts are a crime against humanity. End this atrocious and greedy attack.

Sincerely,
Dorothy Wilson

From: [Douglas Collura](#)
To: [Land Use Testimony](#)
Subject: [EXTERNAL] Vote No on the SoHo/NoHo/Chinatown Upzoning Plan
Date: Wednesday, November 3, 2021 1:41:51 AM

To the City Council:

I strongly urge the City Council to vote no on the disastrous SoHo/NoHo/Chinatown upzoning plan. This proposal would fulfill none of its affordable-housing promises, as it actually makes it more profitable to build without affordable housing than with. It will create huge incentives for destroying the hundreds of existing units of rent-regulated and loft-law affordable housing in the neighborhood, disproportionately occupied by lower-income, senior, artist, and Asian American residents, many of whom would be displaced. It will push out arts and any other small businesses with its allowance for giant big-box retail of unlimited size. It will encourage grossly oversized development up to 2.5 times the size current rules allow, and more than 2.5 times the size of average buildings here now. It will encourage the destruction of historic buildings, and allow developers to add luxury condos and apartments with no affordable housing so long as they don't exceed 25,000 sq ft per zoning lot. Even in this relatively wealthy neighborhood, new development even with the 25–30% “affordable” housing will still overall make the neighborhood richer, less diverse, and more expensive, as the new market-rate units would be so expensive and the “affordable” ones unaffordable to even a significant share of residents here.

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Regards,
Douglas Collura
200 E 24th St
New York, NY 10010

Chair Francisco P. Moya
Subcommittee on Zoning and Franchises
New York City Council
City Hall
New York, NY 10007

Dear Chair Moya and the Council Subcommittee on Zoning and Franchises,

My name is Douglas Pardella and I would like to offer testimony in favor of the Soho/Noho Neighborhood Plan that will zone for an additional 3,200 homes in the job-rich, transit-rich neighborhoods of Soho and Noho, with the preferred condition of lowered office density. I have been a resident of Manhattan for nearly a decade and I have spent much of that time working in city, state, and federal politics here in the city. I am currently a Master of Urban Planning candidate at NYU Robert F. Wagner School of Public Service with a concentration in Housing and Economic Development.

New York City has a severe shortage of housing. In the last decade, the population of New York City grew by 500,000 people, city employment increased by 800,000 jobs, but builders were only able to create 100,000 new homes. The housing vacancy rate of a healthy city should be around eight percent, but Manhattan has rarely seen a vacancy rate above three percent since the financial crisis of the 1970s and 80s. There are too few homes for too many people and that is driving rents up and quality down. When there isn't enough housing, at best, people don't have as much money to spend on things other than housing that make an economy healthy and the land-owning gentry slowly soak renters dry, crippling the city at large. At worst, people who can't cough up enough cash are pushed out of a neighborhood and away from their families and friends and jobs, or maybe they can't find a new home at all and they are forced to live on the street.

The reason we are facing this crisis of high housing costs and low vacancy rates as well as the humanitarian emergency of homelessness is because it has been made effectively illegal to build more homes in high-opportunity neighborhoods that are filled with jobs and unmatched transit access like Soho and Noho. My fellow students and I would have loved to opportunity to live near our NYU graduate program in Soho. Unfortunately, even if I still had the above-median-income salary I used to earn, I would have to put more than 100% of my salary towards rent in order to afford an apartment. By not allowing more housing to be built in these job-rich neighborhoods, students like me—in addition to job-seeking transplants and even the children of the incumbent renters looking for their own homes—will instead be competing for housing with incumbent, low-income residents of Chinatown, the Lower East Side, or, in my case, Washington Heights.

This is also an environmental justice issue. Using public transit reduces carbon emissions and living in an apartment reduces carbon emissions. That's why studies show New Yorkers emit approximately 30 percent of the greenhouse gas the typical American does. The easiest and most

cost-effective way to lower our country's carbon emissions is by allowing non-New Yorkers to live in New York, a place where a ton of people already want to live but cannot afford to. If we are serious about fighting climate change, we need to build enough homes for those who are already here and those who will soon arrive.

Perhaps most importantly, this is a racial segregation issue. Every level of government, from federal on down to local, racially segregated the country with redlining, public housing segregation, highway development, and—when most of that became illegal—restrictive, exclusionary zoning laws. It's why neighborhoods are still segregated today. The government backed home loans for white folks across the economic spectrum to move into segregated neighborhoods. Then, once all the white folks had homes, housing and land use laws made the building of new homes effectively illegal, which then let the white folks' houses skyrocket in value, while Black and brown folks got nothing. That's largely the reason why white people in this country have ten times the wealth per capita than Black people do. Even if Soho wasn't designed segregation like New York's suburbs are, the same tactics of exclusionary zoning allowed this formerly abandoned industrial neighborhood to become one of the whitest and wealthiest neighborhoods in the city.

The evils of racial segregation effect far more than just where a person lives. This is an educational issue as well. The most effective way to break the income and education gap cycle and allow Black and brown New Yorkers to be economically mobile is by letting low-income students of color get a good education. But the US is a rare country where the schools are funded by local property taxes and, since the neighborhoods are already segregated between rich, white homeowners and poor renters of color, white public schools get more money and resources than schools in communities of color and lock in Black and brown folks' lifelong economic statuses at birth. Nearly every advanced country spends more money educating their poor students than their wealthy students, but America is a shocking, perverted exception. The education and wealth gaps between white and Black Americans have become a continuous, ever-expanding doom loop as a direct result of housing and land use policy.

The Soho/Noho Neighborhood Plan is an extraordinarily rare opportunity to advance our stated ideals of environmental justice, racial justice, and housing affordability for all. Cities are dynamic and they need to change in order to thrive. Through our zoning and land use laws, we have sunk much of our city in amber, especially our neighborhoods with the most jobs and most access to transit. The Plan will help to make our city dynamic once again, lowering the cost of housing citywide, building a healthier economy, and allowing working- and middle-class families to once again access the best that New York has to offer.

Sincerely,
Douglas Pardella
504 West 167th St. Apt. ■■■■■
New York, NY 10032

East Village Community Coalition

143 Avenue B – Simplex

New York, NY 10009

(212) 979-2344

www.evccnyc.org



November 09, 2021

SubCommittee on Land Use and Zoning

The City's plan to upzone SoHo and NoHo continues to move forward, despite fierce opposition from a large number of community organizations, and Community Board 2's nearly unanimous recommendation to reject the plan.

How the City's proposed plan would result in anything besides a wave of hyper-gentrification defies logic. The plan at best mandates only 25% affordable housing, and allows 75% luxury housing. The proposed plan has numerous loopholes, with no public benefit of any kind required to develop commercial space or private institutional facilities. It would permit institutional expansion, and crowd out local independent businesses by allowing more big-box chain stores, as well as eating and drinking establishments of unlimited size.

We echo Cooper Square Committee's call for protections for tenants and against demolition. Many of our neighbors' incomes fall well below the median figures offered. Show us where upzoning, or the absence of landmarking and other protections, has created affordable housing. These policies result in demolitions, and the loss of rent-stabilized units, as we've seen again and again. These policies result in homogenization: the loss of retail diversity and independently-owned small businesses, as we've seen again and again.

Housing doesn't trickle down, it's bought and held as a commodity.

Of course some zoning changes may be needed, especially when it comes to commercial space, and height restrictions on as-of-right-development. Not only do the existing commercial spaces require a special permit, they are far too large to be within the reach of most independent small business owners.

The *Community Rezoning Plan* would help create more affordable housing and help retain existing independent small businesses, while retaining the creative neighborhood character that draws residents and visitors alike.

Allowing out-of-scale enlargements in and adjacent to these six historic districts sets a terrible precedent, not only for existing affordable housing in these neighborhoods, but for existing affordable housing in historic districts city-wide. Please reject this deeply-flawed plan.

Best,

A handwritten signature in black ink that reads "Laura Sewell". The signature is fluid and cursive, with "Laura" on top and "Sewell" on the line below it, both written in a single continuous stroke.

Laura Sewell | Executive Director
East Village Community Coalition

From: [Elayne Tobin](#)
To: [Land Use Testimony](#)
Subject: [EXTERNAL] Vote No on the SoHo/NoHo/Chinatown Upzoning Plan
Date: Thursday, November 11, 2021 6:25:32 AM

To the City Council:

This is simply an attempt by Mayor De Blasio to appease his development investors. I strongly urge the City Council to vote no on the disastrous SoHo/NoHo/Chinatown upzoning plan. This proposal would fulfill none of its affordable-housing promises, as it actually makes it more profitable to build without affordable housing than with. It will create huge incentives for destroying the hundreds of existing units of rent-regulated and loft-law affordable housing in the neighborhood, disproportionately occupied by lower-income, senior, artist, and Asian American residents, many of whom would be displaced. It will push out arts and any other small businesses with its allowance for giant big-box retail of unlimited size. It will encourage grossly oversized development up to 2.5 times the size current rules allow, and more than 2.5 times the size of average buildings here now. It will encourage the destruction of historic buildings, and allow developers to add luxury condos and apartments with no affordable housing so long as they don't exceed 25,000 sq ft per zoning lot. Even in this relatively wealthy neighborhood, new development even with the 25–30% “affordable” housing will still overall make the neighborhood richer, less diverse, and more expensive, as the new market-rate units would be so expensive and the “affordable” ones unaffordable to even a significant share of residents here.

The City has consistently lied about the impact the rezoning would have and who would be hurt by it. It's the lower-income tenant-renters, artists, seniors, and Chinatown residents who will be most hurt. Neighbors support an alternative plan for real affordable housing without displacement, oversized development, and big-box chain stores. Vote no.

Regards,
Elayne Tobin
2 Washington Square Village
New York, NY 10012

From: [Els Phillips](#)
To: [Land Use Testimony](#)
Subject: [EXTERNAL] Vote No on the SoHo/NoHo/Chinatown Upzoning Plan
Date: Thursday, November 11, 2021 6:34:53 PM

To the City Council:

I strongly urge the City Council to vote no on the disastrous SoHo/NoHo/Chinatown upzoning plan. This proposal would fulfill none of its affordable-housing promises, as it actually makes it more profitable to build without affordable housing than with. It will create huge incentives for destroying the hundreds of existing units of rent-regulated and loft-law affordable housing in the neighborhood, disproportionately occupied by lower-income, senior, artist, and Asian American residents, many of whom would be displaced. It will push out arts and any other small businesses with its allowance for giant big-box retail of unlimited size. It will encourage grossly oversized development up to 2.5 times the size current rules allow, and more than 2.5 times the size of average buildings here now. It will encourage the destruction of historic buildings, and allow developers to add luxury condos and apartments with no affordable housing so long as they don't exceed 25,000 sq ft per zoning lot. Even in this relatively wealthy neighborhood, new development even with the 25–30% “affordable” housing will still overall make the neighborhood richer, less diverse, and more expensive, as the new market-rate units would be so expensive and the “affordable” ones unaffordable to even a significant share of residents here.

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Regards,
Els Phillips
14 E 4th St
New York, NY 10012

From: [Emily Harting](#)
To: [Land Use Testimony](#)
Subject: [EXTERNAL] Vote No on the SoHo/NoHo/Chinatown Upzoning Plan
Date: Thursday, November 11, 2021 2:21:53 PM

To the City Council:

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The City has consistently lied about the impact the rezoning would have and who would be hurt by it. It's the lower-income tenant-renters, artists, seniors, and Chinatown residents who will be most hurt. Neighbors support an alternative plan for real affordable housing without displacement, oversized development, and big-box chain stores. Vote no.

Regards,
Emily Harting
335 Throop Ave
Brooklyn, NY 11221

From: fend@ocean-earth.net
To: [sante scardillo; Land Use Testimony](#)
Subject: [EXTERNAL] Re: Amended - NO to Soho/Noho Rezoning "plan" -Testimony for City Council November 9 Committee hearing
Date: Thursday, November 11, 2021 8:25:42 AM

My survival does not allow me to read this.

On 11/11/2021 8:19 AM sante scardillo <scardillante@hotmail.com> wrote:

I updated my testimony during the presentation by NYCDPD. On the emblematic statement by one of the presenting bureaucrats: present zoning reserves ground floor use for industrial activities, imposing unbearable burden on development. Industrial? Such as flagship stores by Chanel, Valentino, Burberry, side by side on Spring Street, and Luis Vuitton further up the block?

Obviously there are ways to get around existing zoning, and turn the formerly destined for the wrecking ball small manufacturing artist ghetto into a bling mine: this is precisely why the present zoning should be left as is. But the presenting bureaucrats seem more concerned with flowcharts than walking the neighborhoods they are so hellbent on “de-structuring”.

Residents have accepted the compromise of living in an open air mall, but the greed of the forces that have turned what artists and community organizations saved from Robert Moses' wrecking ball into a commercial carnival, will literally dig out the ground we and they stand on, in pursuit of a bigger profit. They are pushing this evil plan, aided and abetted by the City administration they so skillfully worked and paid for to front for it.

The land grab proceeds unabashed in the waning months of the DeBlasio regime, in cahoots with our corrupt representatives in the City Council (we can't wait for you leave office): the East River Park Destruction, the Governor's Island and Gowanus Canal "rezoning"; the seizing of every square and cubic inch over any lot

to make a profit for real estate holders and connected construction companies, while robbing the people of New York City of air, light and what the city economy thrives on: neighborhoods diversity, which turns each New Yorker into a spending scholar-tourist, while learning about our diverse cultural history.

Don't kill the goose that lays the golden eggs: if this wretched plan is allowed to proceed, in a few years Soho and Noho won't look or feel any different from Midtown Manhattan. Is this what we want our city to become? The City Council has a responsibility, to the people of our great city and to History. Don't kill the arts, culture, and the human resources of long timers like me (40 years in the neighborhood) which makes us, collectively as a city, what we are; and don't buy in the astro-turfing pretenses of encouraging diversity: they are just that, no matter how fancy the sheep clothing. For a long time, green has been the only color that allows newcomers to the area, and this plan will cement the trend. I entreat you to Vote NO and consign this aberration to the dustbin of history.

Sante Scardillo
For LINA, Little Italy Neighborhood Association

From: [R Gumm](#)
To: [Land Use Testimony](#)
Subject: [EXTERNAL] Flavin Judd testimony 11/9/2021
Date: Thursday, November 11, 2021 9:46:25 AM

Hi, my name is Flavin Judd and i grew up in Soho although I can no longer afford to live there. I would love to have more families and more diversity come to the neighborhood and replace the luxury apartments and shops. This would be a return to the vibrant neighborhood that I grew up in. Unfortunately the city's plan would result in the reverse. It's naive to think that any low income housing will come out of this plan. The supporters of the plan say it will become a model and they are right. It will become a model in it's real goal: avoiding the building of low income housing and the displacement of low income residents. The many loopholes and mechanisms it proposes will mean that low income housing will be almost impossible to build city-wide in the future. Luxury apartments and retail are the goal, a shopping mall for the ultra wealthy. Hudson Yards stole 1.2 billion in low income housing investment funds to build luxury apartments. The razing of a quarter of Chinatown for a billionaire's paradise is disgusting. Unfortunately Hudson Yards and it's stolen funds are the model for the future. The city needs to approach housing holistically and with the entire city in mind with bold, equitable solutions that reduce luxury apartments and multinational luxury shops. It's one or the other, you can either build a mall or a city. -Flavin Judd

From: [Gregg Silverman](#)
To: [Land Use Testimony](#)
Subject: [EXTERNAL] Vote No on the SoHo/NoHo/Chinatown Upzoning Plan
Date: Wednesday, November 3, 2021 5:12:44 AM

To the City Council:

I strongly urge the City Council to vote no on the disastrous SoHo/NoHo/Chinatown upzoning plan. This proposal would fulfill none of its affordable-housing promises, as it actually makes it more profitable to build without affordable housing than with. It will create huge incentives for destroying the hundreds of existing units of rent-regulated and loft-law affordable housing in the neighborhood, disproportionately occupied by lower-income, senior, artist, and Asian American residents, many of whom would be displaced. It will push out arts and any other small businesses with its allowance for giant big-box retail of unlimited size. It will encourage grossly oversized development up to 2.5 times the size current rules allow, and more than 2.5 times the size of average buildings here now. It will encourage the destruction of historic buildings, and allow developers to add luxury condos and apartments with no affordable housing so long as they don't exceed 25,000 sq ft per zoning lot. Even in this relatively wealthy neighborhood, new development even with the 25–30% “affordable” housing will still overall make the neighborhood richer, less diverse, and more expensive, as the new market-rate units would be so expensive and the “affordable” ones unaffordable to even a significant share of residents here.

The City has consistently lied about the impact the rezoning would have and who would be hurt by it. It's the lower-income tenant-renters, artists, seniors, and Chinatown residents who will be most hurt. Neighbors support an alternative plan for real affordable housing without displacement, oversized development, and big-box chain stores. Vote no.

Regards,
Gregg Silverman
714 Broadway
New York, NY 10003

From: [Henry Flax](#)
To: [Land Use Testimony](#)
Subject: [EXTERNAL] Vote No on the SoHo/NoHo/Chinatown Upzoning Plan
Date: Wednesday, November 3, 2021 12:12:18 PM

To the City Council:

I strongly urge the City Council to vote no on the disastrous SoHo/NoHo/Chinatown upzoning plan. This proposal would fulfill none of its affordable-housing promises, as it actually makes it more profitable to build without affordable housing than with. It will create huge incentives for destroying the hundreds of existing units of rent-regulated and loft-law affordable housing in the neighborhood, disproportionately occupied by lower-income, senior, artist, and Asian American residents, many of whom would be displaced. It will push out arts and any other small businesses with its allowance for giant big-box retail of unlimited size. It will encourage grossly oversized development up to 2.5 times the size current rules allow, and more than 2.5 times the size of average buildings here now. It will encourage the destruction of historic buildings, and allow developers to add luxury condos and apartments with no affordable housing so long as they don't exceed 25,000 sq ft per zoning lot. Even in this relatively wealthy neighborhood, new development even with the 25–30% “affordable” housing will still overall make the neighborhood richer, less diverse, and more expensive, as the new market-rate units would be so expensive and the “affordable” ones unaffordable to even a significant share of residents here.

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Regards,
Henry Flax
60 Plaza St █
Brooklyn, NY 11238



HOUSING RIGHTS INITIATIVE

Testimony on the SoHo/NoHo Rezoning

Submitted by Housing Rights Initiative

November 11, 2021

We are Housing Rights Initiative, a non-profit housing watchdog group that takes a no holds barred, proactive and legal approach to investigating real estate fraud and recovering what was stolen from the tenants and taxpayers of New York City and across the country.

To date our organization has generated close to 80 class-action lawsuits against some of the largest and most prolific real estate companies in the world, including but not limited to Blackstone and Kushner Companies.

Real estate doesn't like us, and we don't like real estate.

Nonetheless, the SoHo rezoning is important because it would lead to the creation of around 900 units of affordable housing in one of the wealthiest, most unaffordable, and most segregated neighborhoods in the United States of America.

Our city has a long and sordid history of exclusively upzoning low income communities, and withholding necessary investments unless those communities produce more than their share of new housing. This is inequitable, unjust, and unproductive. While this rezoning may be imperfect, it's a vital step in the right direction, and there are critical steps, outlined below, that could improve it further

In short, it would be unseemly and misguided to kill a plan that, under the deep affordability option, would create hundreds of homes, asking ~\$900 rents for families of three making \$40,000 a year, in a neighborhood where the median monthly rent for two-bedroom apartments is around \$13,000.

While we support the rezoning efforts, we implore the city to:

- 1) Lower the commercial densities in its plan, as the current proposal is extremely generous for commercial uses and would possibly incentivize developers to build offices rather than mixed-income housing. Amidst an affordable housing crisis, affordable housing should be the number one, number two, and number three priorities.
- 2) Allow for the expansion of community preference for the affordable housing units beyond the confines of Community District 2, in order to include more New Yorkers in need. Due in part to the vast underproduction of new housing in these neighborhoods, Community District 2 is disproportionately whiter and wealthier than the rest of New York City; using the default community preference policy for this rezoning would dampen the rezoning's fair housing and integration goals. Preference could be extended to other Lower Manhattan Community Districts or to the rezoning's *Council* District, both of which would include the more-diverse Chinatown and Lower East Side. Community preference could also be extended to those who work in Community District 2, in addition to those who already live there.
- 3) Enforce our damn housing laws. Our organization has uncovered thousands of buildings that are out of compliance with rent stabilization and various tax benefits. The city must do a better job of holding landlords accountable. Nevertheless, if this rezoning goes through, our watchdog group commits to conducting periodic audits on the landlords of these affordable units. Let us be clear: if we find any landlord committing even the smallest amount of fraud, we will summarily crush them with the iron fist of the law.

These issues must be resolved for the rezoning to reach its full potential.

For context, four out of every ten SoHo residents earn over \$200,000 per year and nearly 80% are caucasian. The SoHo residents may argue that any new housing in SoHo would be out of character with the neighborhood, but we'd argue that SoHo is out of character with New York City.

Not surprisingly, the residents in opposition to the rezoning claim that they are actually in support of affordable housing, just not this specific plan. But if the opposition (many of whom have lived and wielded power in SoHo for decades) truly cared about affordable housing, why did it take them this long to propose their own affordable housing plan that they knew the city would never approve? If the opposition truly cared about affordable housing, why does not a single unit of income-restricted housing currently exist in the proposed rezoning area? If the opposition truly cared about affordable housing, why did Community Board 2's Land Use Committee co-chair say on a [recorded video](#) that SoHo's contribution to the city isn't affordable housing, but its historic character,

cast-iron buildings, and cobblestones, and that “SoHo should not be responsible for producing as much affordable housing as other neighborhoods”?

The SoHo residents also point out that the proposed rezoning would result in the production of some “luxury” units (which would be used to cross-subsidize the deeply affordable units—an economic benefit at the heart of MIH, which the de Blasio administration knew when it proposed the law but thus far has failed to follow through on, rezoning only neighborhoods where all affordable units require city subsidy). While this is true, it begs a different question: If the SoHo residents hate luxury housing so much, why do they live in luxury housing?

SoHo Real Estate Market Trends

Stats: [Quarterly](#) | [Monthly](#)

Market Overview for Quarter 3, 2021

Median Sale Price



88% YoY

While no proposal is perfect, 900 units of rent-regulated housing is better than 0 units of rent-regulated housing, and therefore we support this plan.

From: [Isabel Sole](#)
To: [Land Use Testimony](#)
Subject: [EXTERNAL] Vote No on the SoHo/NoHo/Chinatown Upzoning Plan
Date: Wednesday, November 3, 2021 1:51:18 PM

To the City Council:

I strongly urge the City Council to vote no on the disastrous SoHo/NoHo/Chinatown upzoning plan. This proposal would fulfill none of its affordable-housing promises, as it actually makes it more profitable to build without affordable housing than with. It will create huge incentives for destroying the hundreds of existing units of rent-regulated and loft-law affordable housing in the neighborhood, disproportionately occupied by lower-income, senior, artist, and Asian American residents, many of whom would be displaced. It will push out arts and any other small businesses with its allowance for giant big-box retail of unlimited size. It will encourage grossly oversized development up to 2.5 times the size current rules allow, and more than 2.5 times the size of average buildings here now. It will encourage the destruction of historic buildings, and allow developers to add luxury condos and apartments with no affordable housing so long as they don't exceed 25,000 sq ft per zoning lot. Even in this relatively wealthy neighborhood, new development even with the 25–30% “affordable” housing will still overall make the neighborhood richer, less diverse, and more expensive, as the new market-rate units would be so expensive and the “affordable” ones unaffordable to even a significant share of residents here.

The City has consistently lied about the impact the rezoning would have and who would be hurt by it. It's the lower-income tenant-renters, artists, seniors, and Chinatown residents who will be most hurt. Neighbors support an alternative plan for real affordable housing without displacement, oversized development, and big-box chain stores. Vote no.

Regards,
Isabel Sole
143 Greene St
New York, NY 10012

From: [Jake Gold](#)
To: [Land Use Testimony](#)
Subject: [EXTERNAL] supporting SoHo/NoHo rezoning
Date: Thursday, November 11, 2021 8:09:57 PM

Dear Land Use Committee,

My name is Jake Gold. I'm a resident of lower Manhattan, a constituent of Councilmember Rivera, and a law student at NYU. I'm writing today in support of the SoHo/NoHo rezoning (with the standard caveat that commercial FAR should be lowered to encourage additional housing).

By my eye, we need this rezoning for a few reasons.

1. We need the affordable units.

It should go without saying that creating additional affordable units in the city is critical at a time when New York City has homeless children numbering into six figures. It's never been more urgent that we put roofs over heads, and this rezoning proposal promises to work toward that.

I share many critics' disappointment that the new units won't be 100 percent affordable. That said, given the federal restrictions on new public housing (and the lack of federal money for any social housing) we don't have a feasible path there just yet. That leaves two options: We can organize to fund social housing, wait many years for the approval, and leave low-income New Yorkers in a lurch in the meantime. Or organize to fund social housing and use MIH to create affordable units in the short term. I'm inclined to go with the latter—a lot of people can't wait for the perfect. We won't stop fighting for it, but we can do some good while we do.

2. By the same token, we need the inherent tenant protections that come from additional housing stock.

Many of the rezoning's opponents spoke about displacement from new development during this week's hearing. The other side of the coin, which went unsaid, is that housing shortages create their own slew of problems for current tenants, even aside from the displacement that comes from rising rents. Landlords who are already disinclined to provide necessary repairs feel even less need to make fixes if their tenants can't really leave—they have nowhere to go! In abundant housing markets, the competition for tenants encourages landlords to treat their tenants with respect. It's almost inconceivable imagining how my landlord would act if he had to compete to keep me in this apartment.

Again, we'll keep fighting for the strong legislative tenant protections (e.g., Good Cause). In the short term, and without a repeal of Urstadt, abundance is among the best tenant protections Council can muster.

As an aside, the state legislature has taken strides to create real tenant protections to curb most consequences of new development. That puts us in the tremendous position of being able to build new housing while protecting existing tenants, especially those under rent stabilization.

We should use that power!

3. If we want to tackle climate change, we need more housing close to offices, retail, and schools.

I'm 23. Accordingly, I care a lot about the future of our planet. Displacing tenants from lower Manhattan—a transit oasis, by all accounts—into the outer boroughs is a disastrous proposition. Every New Yorker who can abandon their car is another person taking the single biggest step towards carbon neutrality that a person can take. If Council wants to do something good for the planet, and keep New York above water, rezonings like this one should be among its top priorities.

Thanks kindly, and thank you all for your service to New York. I know it's never easy.

Jake Gold
226 E 14th St., [REDACTED]
New York NY 10003

From: [Jamie Lustberg](#)
To: [Land Use Testimony](#)
Subject: [EXTERNAL] Vote No on the SoHo/NoHo/Chinatown Upzoning Plan
Date: Wednesday, November 3, 2021 12:23:14 AM

To the City Council:

I strongly urge the City Council to vote no on the disastrous SoHo/NoHo/Chinatown upzoning plan. This proposal would fulfill none of its affordable-housing promises, as it actually makes it more profitable to build without affordable housing than with. It will create huge incentives for destroying the hundreds of existing units of rent-regulated and loft-law affordable housing in the neighborhood, disproportionately occupied by lower-income, senior, artist, and Asian American residents, many of whom would be displaced. It will push out arts and any other small businesses with its allowance for giant big-box retail of unlimited size. It will encourage grossly oversized development up to 2.5 times the size current rules allow, and more than 2.5 times the size of average buildings here now. It will encourage the destruction of historic buildings, and allow developers to add luxury condos and apartments with no affordable housing so long as they don't exceed 25,000 sq ft per zoning lot. Even in this relatively wealthy neighborhood, new development even with the 25–30% “affordable” housing will still overall make the neighborhood richer, less diverse, and more expensive, as the new market-rate units would be so expensive and the “affordable” ones unaffordable to even a significant share of residents here.

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Regards,
Jamie Lustberg
712 Broadway
New York, NY 10003

HILLER, PC
Attorneys at Law
641 Lexington Avenue, 29th Floor
New York, New York 10022
(212) 319-4000

Web Address: www.hillerpc.com
Direct email: jzakai@hillerpc.com

Facsimile: (212) 753-4530

November 11, 2021

Via Email: landusetestimony@council.nyc.gov

Honorable Francisco P. Moya, Chair
New York City Council
Subcommittee on Zoning and Franchises
New York City Hall
New York, New York 10007

Re: SoHo/NoHo Neighborhood Plan
Application Nos. C 210422 ZMM, N 210423 ZRM

Dear Chair Moya and Committee Members:

Our law firm specializes in land use, preservation and zoning law in New York. In connection with the above-referenced ULURP applications, we represent individual residents of SoHo and NoHo, as well as the local grassroots community groups SoHo Alliance, Inc. and Broadway Residents Coalition. In addition to the oral testimony we provided at the Subcommittee Hearing on November 9, 2021, we submit this written testimony to express our clients' strong **opposition** to the misguided SoHo/NoHo Neighborhood Upzoning Plan (the "Upzoning Plan" or "Plan").

As an initial matter, the Plan should be rejected on procedural grounds because the applicant, the Department of City Planning ("DCP"), did not comply with the ULURP process under the New York City Charter. Specifically, DCP failed to provide both Community Board 2 and the general public with the requisite pre-certification notice, as required by the recently adopted City Charter amendments. *See* City Charter §197-c(c). As the City Charter requires, at least 30 days prior to certification of the ULURP application, DCP must provide notice to the affected community board consisting of a detailed project summary, and then must publish such notice on DCP's website within 5 days thereafter. *Id.* DCP failed to do this. As a result, the entire ULURP process has been tainted with illegality from the start. We brought an Article 78 proceeding against DCP regarding this procedural violation, and we have a motion on this issue that is still pending in Court.

The Upzoning Plan should also be rejected on its merits because it is simply a bad proposal, and for multiple reasons. For example, the Plan will not bring affordable housing to the area, despite being marketed to the contrary. While the promises of affordable housing may sound tempting, do not be fooled by this Trojan Horse. In reality, on most of the development sites in the rezoning area, the Plan does not require affordable housing, but instead allows for luxury condominiums, and office, hotel and commercial retail space. The Plan is also filled with many loopholes which can be

Hon. Francisco P. Moya
November 11, 2021
page 2

easily used to avoid building any affordable housing in the rezoning area. Notably, several community groups have put forth an alternative proposal which would allow for affordable housing, and would do so without creating enormous, bulky high-rise towers (as the Upzoning Plan entails). Unfortunately, the community-based proposal has been ignored and is not part of the Upzoning Plan now before the City Council.

In addition, the Upzoning Plan would also hurt small businesses in the area. It would legalize destination big-box retail stores, and displace the small, independent creative businesses and local shops.

The Upzoning Plan would also have the effect of displacing different groups of people who live in these neighborhoods. For example, the Plan would punish artists who have been living and working there for decades by effectively imposing a punitive flip tax on them, and requiring them to convert their “JLWQA” units from the current zoning to a conforming residential use. Such a flip tax would push the artists out of SoHo/NoHo, along with the beloved arts groups and related businesses which are integral to the area. Adding insult to injury, the Plan fails to impose any such tax on commercial owners converting their units from manufacturing to retail use.

The Upzoning Plan would also fail to protect the many designated landmarks in the area. One of the reasons SoHo/NoHo is so special and unique is that it is comprised of several Historic Districts and numerous individual landmarked buildings. However the Upzoning Plan would encourage the demolition of many historic buildings. It is telling that the Landmarks Preservation Commission has not been present at any of the public hearings to speak about the effect of the Plan on landmarks preservation.

For these reasons, along with many others raised by those in opposition, we urge the City Council to vote **NO** on the SoHo/NoHo Neighborhood Plan. Thank you for your attention to this important matter.

Respectfully submitted,

/s/ Jason E. Zakai

Jason E. Zakai

From: [Eilbott, Jeffrey](#)
To: [Chin, District2](#)
Cc: [Drummond, Anthony](#); [Fung, Cora](#); [District2](#); [Cehonski, Irak](#); [Speaker Corey Johnson](#); [Bottcher, Erik](#); [Comerford, Patrice](#); [Office of Council Member Powers](#); [Levine, Mark](#); [Lander, Brad](#); [AskJB](#); [Salamanca, Rafael](#); [Moya, Francisco](#); [Deborah Glick](#); [Helen@helenrosenthal.com](#); [District7](#); [Avala, Diana](#); [D09Perkins](#); [Rodriguez, Ydanis](#); [Dinowitz](#); [Gonaj, Mark](#); [Cabrera, Fernando](#); [District16Bronx](#); [Diaz, Ruben](#); [District19](#); [Koo, Peter](#); [Costa Constantinides](#); [Grodenchik, Barry S.](#); [Dromm, CM](#); [Van Bramer, Jimmy](#); [Adams](#); [Koslowitz, CM](#); [District30](#); [Ulrich, Eric](#); [Levin, Stephen](#); [Reynoso, Antonio](#); [Cumbo, Laurie](#); [Corney, Robert](#); [District37](#); [info38](#); [Council Member Lander](#); [Eugene, Mathieu](#); [District41](#); [Barron, Inez](#); [AskKalman](#); [District45](#); [Maisel, Alan](#); [Treyger, Mark](#); [Deutsch, Chaim](#); [Rose, Deborah](#); [Matteo, Steven](#); [Joseph Borelli](#); [joddo@statenislandusa.com](#); [BKallos@benkallos.com](#); [SoHo Alliance](#)
Subject: [EXTERNAL] Please REJECT harmful Soho/Noho Upzoning
Date: Tuesday, November 9, 2021 6:05:29 PM

Dear Councilmembers Chin and Rivera, and colleagues,
I'm writing to urge you to reject the harmful plan to upzone historic downtown neighborhoods. The plan benefits developers and wealthy interests at the expense of the neighborhood residents you represent. It will decimate small businesses. Our communities hate this plan but we would welcome real affordable housing. Please do the right thing and vote NO.

- It legalizes destination big-box retail, putting displacement pressure on small, creative businesses and local retail stores
- Loopholes fail to guarantee that a single unit of affordable housing will ever be built, while encouraging luxury residential construction
- Resulting gentrification will put tremendous displacement pressure on low-income, rent-stabilized, Asian-American tenants in Chinatown, as well as loft tenants in SoHo/Noho
- It allows the influx of huge restaurants, bars and nightclubs, including entertainment space outdoors and on roofs
- It encourages new construction of office towers 2-1/2 times the size of the average SoHo/Noho building
- It is the first upzoning of an historic district since the Landmarks Preservation Commission was created in 1965
- It will encourage demolition of historic buildings
- It is a lame-duck giveaway to de Blasio's real-estate donors, like Edison Parking, which owns the two largest development sites in the proposal
- It will legalize the expansion of NYU into SoHo, something NYU agreed never to do
- The community has prepared a plan that will allow affordable housing but now by permitting high rise towers.

Please do the right thing and vote NO.

Best,
Jeff Eilbott

From: [Jeff Prant](#)
To: [Land Use Testimony](#)
Subject: [EXTERNAL] Testimony on the Soho/Noho Upzoning Proposal
Date: Thursday, November 11, 2021 2:13:45 PM

This proposal threatens to fundamentally disrupt the character of Soho, Noho, and Chinatown. Walking the streets of these neighborhoods is one of the great joys of living in this city. Its inspiring architecture recalls the city's rich history, its diverse population reflects the essence of the American immigrant experience, and its human scale captures the ideal form of what urban life should be. The city must reject this plan and protect these neighborhoods for all current and future generations of New Yorkers.

Sincerely,
JeffPrant
293 Garfield Place, Brooklyn, New York 11215

From: [Jill Rapaport](#)
To: [Land Use Testimony](#)
Subject: [EXTERNAL] Vote No on the SoHo/NoHo/Chinatown Upzoning Plan
Date: Thursday, November 11, 2021 10:37:29 PM

To the City Council:

I strongly urge the City Council to vote no on the disastrous SoHo/NoHo/Chinatown upzoning plan. This proposal would fulfill none of its affordable-housing promises, as it actually makes it more profitable to build without affordable housing than with. It will create huge incentives for destroying the hundreds of existing units of rent-regulated and loft-law affordable housing in the neighborhood, disproportionately occupied by lower-income, senior, artist, and Asian American residents, many of whom would be displaced. It will push out arts and any other small businesses with its allowance for giant big-box retail of unlimited size. It will encourage grossly oversized development up to 2.5 times the size current rules allow, and more than 2.5 times the size of average buildings here now. It will encourage the destruction of historic buildings, and allow developers to add luxury condos and apartments with no affordable housing so long as they don't exceed 25,000 sq ft per zoning lot. Even in this relatively wealthy neighborhood, new development even with the 25–30% “affordable” housing will still overall make the neighborhood richer, less diverse, and more expensive, as the new market-rate units would be so expensive and the “affordable” ones unaffordable to even a significant share of residents here.

The City has consistently lied about the impact the rezoning would have and who would be hurt by it. It's the lower-income tenant-renters, artists, seniors, and Chinatown residents who will be most hurt. Neighbors support an alternative plan for real affordable housing without displacement, oversized development, and big-box chain stores. Vote no.

Regards,
Jill Rapaport
341 W 24th St
New York, NY 10011

From: [JoanMarie palmer](#)
To: [Land Use Testimony](#)
Subject: [EXTERNAL] Vote No on the SoHo/NoHo/Chinatown Upzoning Plan
Date: Thursday, November 11, 2021 11:04:23 AM

To the City Council:

I strongly urge the City Council to vote no on the disastrous SoHo/NoHo/Chinatown upzoning plan. This proposal would fulfill none of its affordable-housing promises, as it actually makes it more profitable to build without affordable housing than with. It will create huge incentives for destroying the hundreds of existing units of rent-regulated and loft-law affordable housing in the neighborhood, disproportionately occupied by lower-income, senior, artist, and Asian American residents, many of whom would be displaced. It will push out arts and any other small businesses with its allowance for giant big-box retail of unlimited size. It will encourage grossly oversized development up to 2.5 times the size current rules allow, and more than 2.5 times the size of average buildings here now. It will encourage the destruction of historic buildings, and allow developers to add luxury condos and apartments with no affordable housing so long as they don't exceed 25,000 sq ft per zoning lot. Even in this relatively wealthy neighborhood, new development even with the 25–30% “affordable” housing will still overall make the neighborhood richer, less diverse, and more expensive, as the new market-rate units would be so expensive and the “affordable” ones unaffordable to even a significant share of residents here.

The City has consistently lied about the impact the rezoning would have and who would be hurt by it. It's the lower-income tenant-renters, artists, seniors, and Chinatown residents who will be most hurt. Neighbors support an alternative plan for real affordable housing without displacement, oversized development, and big-box chain stores. Vote no.

Regards,
JoanMarie palmer
309 5th Ave
Brooklyn, NY 11215

Written testimony for New York City Council's Subcommittee on Zoning and Franchises, Tuesday, November 9, 2021

Joyce Kozloff, [REDACTED], joycekozloff@gmail.com, artist

in response to conversations with my son, writer Nikolas Kozloff, who grew up in Soho

I listened to the hearing, and wondered why we weren't talking about retrofitting and utilizing the already **existing** space in Soho and Noho: the vast number of empty storefronts and offices in beautiful, landmarked buildings. When all this space exists and renters are scarce, it seems crazy to be building still more units! Retail and commerce were already moving online before the pandemic, which simply accelerated the rate. My block, Wooster St, has mostly empty storefronts.

What attracts visitors to our streets and buildings is their scale. There are shopping malls, glass towers and big box stores in other parts of New York. Soho, Noho, Greenwich Village and Chinatown offer an intimate walking and discovering experience, a vital street life full of texture and color, a pedestrian pace that allows for browsing and conversing.

Are there groups of planners rethinking the use of these historic cast iron structures? They could become centers for the development of cultural and environmental projects: urban gardens, experimental new media arts centers, laboratories for clean energy development. Yes, this would take considerable monetary investment and would not be sexy to the commercial interests that would like to destroy what is here! But maybe the city is looking at the wrong kind of investors. Might large charitable foundations - like the Ford or Gates Foundations, for instance - fund a massive project to reinvent the neighborhood as a vital twenty-first century creative hub, putting lots of people to work in the process?

From: [Julian Hatton](#)
To: [Land Use Testimony](#)
Subject: [EXTERNAL] Upzoning
Date: Wednesday, November 10, 2021 5:43:11 PM

Preservation comes at a cost, but so does architectural change.

The Soho- Chinatown neighborhoods currently stand out as unique and successful on so many levels - tourism, commercial activity, residential housing - why mess with it if it ain't broke?

Julian Hatton
489 Broome St [REDACTED]
New York, NY 10013

Julian Hatton
c [REDACTED]
Next solo Oct 30 E Harris gallery nyc
Instagram: @julian3hatton
Sent from iPhone

From: [Julie Marr](#)
To: [Land Use Testimony](#)
Subject: [EXTERNAL] Vote No on the SoHo/NoHo/Chinatown Upzoning Plan
Date: Friday, November 12, 2021 9:31:27 AM

To the City Council:

I strongly urge the City Council to vote no on the disastrous SoHo/NoHo/Chinatown upzoning plan. This proposal would fulfill none of its affordable-housing promises, as it actually makes it more profitable to build without affordable housing than with. It will create huge incentives for destroying the hundreds of existing units of rent-regulated and loft-law affordable housing in the neighborhood, disproportionately occupied by lower-income, senior, artist, and Asian American residents, many of whom would be displaced. It will push out arts and any other small businesses with its allowance for giant big-box retail of unlimited size. It will encourage grossly oversized development up to 2.5 times the size current rules allow, and more than 2.5 times the size of average buildings here now. It will encourage the destruction of historic buildings, and allow developers to add luxury condos and apartments with no affordable housing so long as they don't exceed 25,000 sq ft per zoning lot. Even in this relatively wealthy neighborhood, new development even with the 25–30% "affordable" housing will still overall make the neighborhood richer, less diverse, and more expensive, as the new market-rate units would be so expensive and the "affordable" ones unaffordable to even a significant share of residents here.

The City has consistently lied about the impact the rezoning would have and who would be hurt by it. It's the lower-income tenant-renters, artists, seniors, and Chinatown residents who will be most hurt. Neighbors support an alternative plan for real affordable housing without displacement, oversized development, and big-box chain stores. Vote no.

Regards,
Julie Marr
377 Broome St
New York, NY 10013

From: [June Anderson](#)
To: [Land Use Testimony](#)
Subject: [EXTERNAL] Vote No on the SoHo/NoHo/Chinatown Upzoning Plan
Date: Thursday, November 11, 2021 1:36:00 PM

To the City Council:

I am a dancer and choreographer who has lived and worked in Soho for the past 40 years. I have taught dance in New York City schools for the past 25 years. My husband, a musician and playwright, and I have dedicated much labor and hard-earned money to preserving this beautiful historic neighborhood and the 1860 building we are fortunate to live in. We are also strong supporters of affordable housing and social justice. We absolutely support affordable housing in Soho, Noho, and Chinatown. However, we do not buy the cynical choice between preserving a unique historic neighborhood and providing affordable housing. We can preserve the Soho Historic District as it is, AND provide affordable housing. The upzoning plan is a giveaway to developers pure and simple. No one is fooled by phony promises of affordable housing. It's the same old song - developers have been itching to build million-dollar condos in Soho for years, and they've already built a number of them on every scrap of available land they could find, starting with the glass condo tower on the NE corner of Mercer and Grand around the corner from my home (apartments there start around 7 million.) We strongly urge the City Council to vote NO on the disastrous SoHo/NoHo/Chinatown upzoning plan. This proposal would fulfill NONE of its affordable-housing promises, as it actually makes it more profitable to build without affordable housing than with. It will create huge incentives for destroying the hundreds of existing units of rent-regulated and loft-law affordable housing in the neighborhood, disproportionately occupied by lower-income, senior, artist, and Asian American residents, many of whom would be displaced. It will push out arts and any other small businesses with its allowance for giant big-box retail of unlimited size. It will encourage grossly oversized development up to 2.5 times the size current rules allow, and more than 2.5 times the size of average buildings here now. It will encourage the destruction of historic buildings, and allow developers to add luxury condos and apartments with no affordable housing so long as they don't exceed 25,000 sq ft per zoning lot. Even in this relatively wealthy neighborhood, new development even with the 25–30% “affordable” housing will still overall make the neighborhood richer, less diverse, and more expensive, as the new market-rate units would be so expensive and the “affordable” ones unaffordable to even a significant share of residents here.

The City has consistently lied about the impact the rezoning would have and who would be hurt by it. It's the lower-income tenant-renters, artists, seniors, and Chinatown residents who will be most hurt. Neighbors support an alternative plan for real affordable housing without displacement, oversized development, and big-box chain stores. VOTE NO.

Regards,
June Anderson
31 Mercer St
New York, NY 10013

JUSTIN GARRETT MOORE, AICP, NOMA

November 9, 2021

Dear New York City Council Subcommittee on Zoning and Franchises,

The changes, stress, and uncertainty that we collectively have been living through are overwhelming. The impacts of the pandemic and social movements beg us to ask: Will we return to our previous dynamics and parochial norms? Or are we ready to make the difficult choices required to shift power and move us toward greater equity and justice? After years of careful study and a robust stakeholder engagement and public reviews, the City Council has the opportunity to problem-solve and establish a new pattern for how we could live together in New York—including in our highly-valued neighborhoods like Manhattan's SoHo and NoHo.

The city's proposed plan to rezone these neighborhoods would promote new development and affordable housing, modernize severely outdated land use and urban design regulations, and provide essential resources for artists and an improved public realm. Despite the proposed plan's benefits, some oppose the rezoning, contending that it would bring unwanted changes to the neighborhoods and surrounding areas. An important context for this opposition is that the city's demographic analysis indicates that the SoHo/NoHo area is 72 percent white, and 41 percent of its households earn more than \$200,000 annually.

Unsurprisingly, New York's predominantly white and high-income communities have long eluded the responsibility to contribute to the city's affordable housing supply by insisting that their communities should not be subjected to the stresses and uncertainties of transformative change. Often the rationale includes preserving historic neighborhood character and preventing out-of-scale development. In this case, the proposed zoning and design regulations have been tailored to be compatible with the urban context and the designated historic districts that would still require the NYC Landmarks Preservation Commission's review for appropriateness and quality design. The plan would also ensure that the area's legacy as a nexus for the arts and artists would have ongoing support.

Skepticism about rezonings is understandable; plans like these often bring significant changes to a community over time. However, it is essential to ask: whose neighborhoods should we expect to change and help address New York's affordable housing challenges? The city's Mandatory Inclusionary Housing (MIH) program is a mechanism to generate desperately needed permanently affordable housing all across the city. MIH could also help to correct long-standing legacies of segregation and inequality that are deeply engrained in our city, including in its historic and affluent neighborhoods like SoHo/NoHo, which is only 1.8% Black (NYC overall is 20% Black).

A well-known narrative is that predominantly Black, Indigenous, and People of Color or otherwise lower-valued communities are subjected to rezonings and new development to shoulder the burden of the city's growth and demand for affordable housing. Plenty of examples illustrate this narrative—whether it is a predominantly Black community in Brooklyn or Manhattan or an underutilized industrial waterfront in the Bronx, Staten Island, or Queens. These communities endure significant changes for the sake of all.

However, a less dominant but equally important narrative is where predominantly white and higher-income neighborhoods systematically prevent significant changes to their communities. The proposed rezoning before the City Council is about the SoHo/NoHo neighborhoods and their future, but it is also about New York City and its future. SoHo/NoHo needs to change because our city needs to change. New York has entrenched structural, spatial, and environmental inequalities. It also is defined by

JUSTIN GARRETT MOORE, AICP, NOMA

new inequalities and injustices created by decisions and investments, or lack thereof, being made every day. The city's COVID-19 hospitalization and deaths data and the Black Lives Matter protests demonstrated what many already know; racial justice and spatial justice are linked. We need to talk about and address where we live. We need to talk about and address how we will live together. This is not only a conversation for communities like Brownsville and Bushwick; it is a conversation for neighborhoods like SoHo and NoHo.

Planning, design, and policy have been powerful and effective tools for producing and sustaining inequality in our city. Still, these same tools have the potential to move us toward greater equity and justice. Like any other major plan or policy, this one isn't perfect. But with an estimated 900 units of new affordable housing with access to transit, services, and opportunities for New Yorkers, it is a step in the right direction. The SoHo/NoHo neighborhoods have the opportunity to do what neighborhoods like East New York, East Harlem, or the Jerome Avenue Corridor in the Bronx have already been asked to do—change. Support for the SoHo/NoHo rezoning is an excellent way for our elected leaders to prove that New York can and will continue to be the bold, complex, creative, and inclusive city that we all deserve.

Sincerely,

A handwritten signature in black ink, appearing to read "Justin Garrett Moore".

Justin Garrett Moore, AICP, NOMA

From: [Kathleen Wakeham](#)
To: [Land Use Testimony](#)
Subject: [EXTERNAL] Vote No on the SoHo/NoHo/Chinatown Upzoning Plan
Date: Thursday, November 11, 2021 4:18:17 PM

To the City Council:

I strongly urge the City Council to vote no on the disastrous SoHo/NoHo/Chinatown upzoning plan. This proposal would fulfill none of its affordable-housing promises, as it actually makes it more profitable to build without affordable housing than with. It will create huge incentives for destroying the hundreds of existing units of rent-regulated and loft-law affordable housing in the neighborhood, disproportionately occupied by lower-income, senior, artist, and Asian American residents, many of whom would be displaced. It will push out arts and any other small businesses with its allowance for giant big-box retail of unlimited size. It will encourage grossly oversized development up to 2.5 times the size current rules allow, and more than 2.5 times the size of average buildings here now. It will encourage the destruction of historic buildings, and allow developers to add luxury condos and apartments with no affordable housing so long as they don't exceed 25,000 sq ft per zoning lot. Even in this relatively wealthy neighborhood, new development even with the 25–30% “affordable” housing will still overall make the neighborhood richer, less diverse, and more expensive, as the new market-rate units would be so expensive and the “affordable” ones unaffordable to even a significant share of residents here.

The City has consistently lied about the impact the rezoning would have and who would be hurt by it. It's the lower-income tenant-renters, artists, seniors, and Chinatown residents who will be most hurt. Neighbors support an alternative plan for real affordable housing without displacement, oversized development, and big-box chain stores. Vote no.

Regards,
Kathleen Wakeham
325 E 12th St
New York, NY 10003

To the Subcommittee on Zoning and Franchises:

I thought that I had been registered to testify on the SoHo/Noho/Chinatown up-zoning Hearing yesterday, Tuesday, November 9, 2021, however my name was not called and I could not access the committee at the end of the hearing. I'm not sure what happened, I did go through the regular Council registration process. Below is the testimony I intended to present on Intro 2443-2021, T 2021-8155, Application No. 210422 ZMM and T 2021-8156, Application No. N210423 ZRM.

Thank you for your efforts.

Good Morning.

My name is Kathryn Freed, I am a former New York City Council Member from the First Council District (from 1992-2001), which included virtually all of the subject districts, that this proposed up zoning would effect. Additionally, I am a recently retired New York State Supreme Court Justice (2004-2013 as a Civil Court Judge, 2014-2020 as a Supreme Court Justice). **I am here today to oppose the proposed zoning changes for SoHo, NoHo and Chinatown.**

I moved into what is now known as SoHo, in 1969. I quickly became involved in community issues, one of which was attaining landmarking for the very architecturally unique Cast Iron buildings in SoHo, at both the Federal and State and City levels. I also helped draft and pass the legislation known as the Loft Law, to protect the many people, mostly artists, who had moved into SoHo and often those cast-iron buildings. Also, as Council Member, I suggested and ultimately gained the Landmarked of NoHo.

New York City Landmarks designated the SoHo Cast Iron Historic District in 1973 and expanded it in 2010. It was listed on the National Register of Historic Places and declared a National Historic Landmark in 1978.

As I said above, many artists began moving into the area because of both the large open areas in loft buildings which allowed artists large studio areas in which to work but also because in the 60's and 70's these spaces were largely empty and could be rented for relatively low amounts. The reason these buildings were empty was due to changing technology. Most of the buildings in SoHo, as with much of TriBeCa and NoHo, were used for light manufacturing and as such, these districts were mostly zoned as M 1-5, i.e. Light Manufacturing districts. As the technology changed, the buildings set empty with little ability to get new tenants, until they were discovered by artists. I should point out that I'm using the term "artists" to cover many different types of artists, from painters, sculptors, photographers, etc.

The artists moved into the area and converted the manufacturing spaces into both living and studio purposes, usually with their own money and usually with the full knowledge of the building owners or

managers. Initially this was beneficial to both parties, artists got low cost living and working space and landlords got rent for spaces they couldn't otherwise rent. As more people moved into SoHo and the surrounding area, it became known as an artist colony and that brought interest, some fame and of course exposed residents of the area to public scrutiny. As a result, rents went up and landlords realized they could also get more rent for their spaces. In a number of publicized cases, and many more, unpublicized ones, landlords were able to evict tenants who had converted their spaces, often without reimbursing them for the conversions they paid for, because they were living in a manufacturing district and the conversions were illegal. These sorts of cases gave rise to the need for what became known as the Loft Law. It also precipitated the ensuing changes in the zoning for these downtown areas so that residents could legally remain in live/workspaces and created a path to legalizing the residential use. I was very involved with the drafting and passing of the first and several later iterations of the Loft Law.

As I said above, the Loft Law passed and has gone through numerous changes and has also expanded to other areas of the City, outside of Lower Manhattan. The goal of these pieces of legislation is to both allow for a more level playing field between the parties, to push for safer residencies and eventually for full legalization of these spaces. Those various legislative goals have been more or less successful.

Additionally as SoHo, and the rest of Lower Manhattan have grown from underground artist communities to what are now world renown districts, for shopping, eating, fashion, etc. and destination places, the stresses on the existing zoning have multiplied as it has tried to keep pace with limited success.

All of this has led us to today. I admit that this is a somewhat abbreviated history but it encapsulates, I believe, the high points. Absolutely no one thinks the existing zoning is perfect, but on the other hand, SoHo etc., didn't happen over night and it is simply wrong to look at it as just a district for the glitterati or Times Square South.

Many of those original residents who converted that empty district into what it is today, are still in place. Some own, some still rent based on the protections that the law allows them. Many of them are, of course, now older and have no place else to go. Some could probably sell their lofts for a lot of money, but SoHo or NoHo are their homes. They produce art, where else would they go. They don't want to be forced out of what have been their homes, for literally half a century. Nor should they be forced to leave. Nor should they be forced to pay into some vague Artist Fund as a penalty for living in those homes for so long. An Artist Fund, which seems to have been just tacked on to a piece of legislation to somehow make it look like it will benefit some unspecified people, maybe "artists," through some unknown way to be managed by some nonexistent organization. Or maybe it's just a punitive flip tax to convert spaces to regular residential use, and yet commercial owners have no reciprocal tax to convert from an "illegal" commercial use, (which is just as "illegal" as residential uses in a manufacturing district), to a legal commercial use. Why penalize one without penalizing the other? Why penalize anyone for doing what was generally acknowledged and accepted for years?

So, why I oppose this zoning. It is an out right attack on Landmarks Preservation. I believe it is just the first salvo by big real estate to get rid of land mark protection in this City.. If this zoning goes through, it will be the first up zoning allowed in an historic district since the creation of the Landmarks Preservation Commission in 1965. SoHo, and to a lesser degree NoHo, are the few remaining examples of Cast Iron architecture in the world. There are some buildings in Chicago and a few in Paris, France but that's it. If SoHo goes, assume other historic Districts will not be far behind.

As far as preserving the famous SoHo, NoHo, street scape, this plan would allow new construction more than two and a half times the average existing building. It would also allow several stories to be built on top of many existing cast iron buildings, since many of them do not maximize their air rights use or their FAR, floor to area ratio. To date, Landmarks has allowed set back roof additions as long as they cannot be seen from the street. This plan would allow very visible floors to be added on top of existing cast iron buildings. This not only would destroy the character of SoHo, but might even endanger the cast iron facades, since most of these buildings are at least 150 years old. They may not survive the additional weight of the additions or the shaking during construction. Also, such construction could be used as harassment tactics since it would necessarily cause dust and distraction for any existing tenants causing, especially older tenants, to vacate

The City says this proposal will result in over 3.8 million square feet of development. But it is more likely to result in over 10 million square feet of new development much of which is not included in their environmental analysis. In fact, the City seems to have left out or over looked a lot of information in their estimates. For instance, they estimate that this proposal will cause up to 900 new units of affordable housing to be built which will also increase diversity in the area. This is a very optimistic fairy tale.

These changes include multiple loopholes that are disincentives to building affordable housing. First, Commercial buildings do not have to build any affordable units. Because the proposals allow large commercial spaces, new buildings are more likely to be commercial. This is particularly true for smaller building along Canal Street. Most likely these buildings will be demolished and commercial units, including Hotel units, will be built. This is likely to be true for many smaller buildings or even empty lots throughout the district.

Another loophole, buildings could have commercial units on the ground or second floor with market rate units on the upper floors. As long as a development has less than 25,000 squire feet of residential space, it is not required to include any affordable Housing units. Additionally, that 25,000 sq. ft. requirement is per zoning lot allowing some of the larger lots in the district to split buildings between zoning lots and therefore never reach the 25,000 sq. ft. limit.

Finally, New York University will likely expand its dormitory use into the new zoning area, something it has tried before but was blocked by the old zoning. These changes provide them with a new opportunity to expand and, again, would create no new affordable units.

The term “Affordable Unit” is really a misnomer for any such units built under this plan. Because of the relatively high incomes of residents of Manhattan’s Community Board 2 (Including the Village, the Meat Market District, SoHo and NoHo) household incomes up to \$160,000 and rents of \$3500 a month would qualify as affordable.

The likelihood of this plan creating more diversity is also nonexistent. More than likely it will be responsible for the eviction of many low income and rent stabilized residents and many people of color currently living in the district, especially in the included area of Chinatown. Why the several blocks of Chinatown, in the southeastern corner of the proposed district, were included is a complete mystery. At first glance, they have nothing in common with the rest of the zoning district. It seems obvious that they were included because they are ripe for development and cobbling them unto this zoning change was the quickest way to do it. Presenting yet another gift to developers like the rest of this proposal. Most likely these buildings will be torn down and rebuilt as market rate housing, to the maximum heights allowed. Even if affordable units are created, clearly, they will be too expensive for any of the low income, rent stabilized tenants who are there now. Additionally, developers have been trying to find a way into Chinatown to start demolishing buildings and replacing them with newer, bigger and more expensive buildings. This would seem to be the first of these attempts.

Just one last thing, by changing the current limits on eating and drinking establishments, as well as allowing large, big-box sales emporiums, this proposal will allow massive such uses which are not only inimical to nearby residents but will force out many of the existing small businesses mostly arts and crafts type shops and galleries many of which have been in business for decades.

I support the zoning changes proposed by Community Board 2, and community groups such as the SoHo Alliance and the Village Preservation, including broadening the definition of artist, I agree commercial uses should be allowed as-of-right on the first and second floors and I support the reasonable suggestions that would allow for more actual affordable units to be built.

Thank you for allowing me to testify. I hope you will deny this entire zoning change and send it back to the drawing board. Let’s start over again with proposals that actually meet the needs of the district with rational zoning changes that result in changes that preserve the historic character of these districts, allow necessary commercial changes that help small businesses and that actually create more affordable units and promote diversity while protecting existing rent stabilized and low income tenants.

From: [Kathy Slawinski](#)
To: [Land Use Testimony](#)
Subject: [EXTERNAL] SOHO/NOHO UPZONING
Date: Wednesday, November 3, 2021 3:14:41 PM

It's very clear to me that this is a parting gift from the mayor to his wealthy donors. It's also clear that this plan will not create more affordable housing--any more than any development and the resulting gentrification create affordable housing. If it did, the city should have plenty of affordable housing, which, of course, is not true.

instead, this scheme will destroy a historical neighborhood and drive out working people and small business. There will be secondary displacement and NYU will continue to take over vast swaths of real estate, effectively ruining the city and displacing people and businesses. Any artists that still remain in the area will be driven out.

Several tenant groups and Michael McKee oppose this plan because it will have a disastrous effect on affordable housing.

Please stop this plan!

Thank you
Kathy Slawinski

From: [Kathy Slawinski](#)
To: [Land Use Testimony](#)
Subject: [EXTERNAL] Vote No on the SoHo/NoHo/Chinatown Upzoning Plan
Date: Wednesday, November 3, 2021 5:26:28 PM

To the City Council:

I strongly urge the City Council to vote no on the disastrous SoHo/NoHo/Chinatown upzoning plan. This proposal would fulfill none of its affordable-housing promises, as it actually makes it more profitable to build without affordable housing than with. It will create huge incentives for destroying the hundreds of existing units of rent-regulated and loft-law affordable housing in the neighborhood, disproportionately occupied by lower-income, senior, artist, and Asian American residents, many of whom would be displaced. It will push out arts and any other small businesses with its allowance for giant big-box retail of unlimited size. It will encourage grossly oversized development up to 2.5 times the size current rules allow, and more than 2.5 times the size of average buildings here now. It will encourage the destruction of historic buildings, and allow developers to add luxury condos and apartments with no affordable housing so long as they don't exceed 25,000 sq ft per zoning lot. Even in this relatively wealthy neighborhood, new development even with the 25–30% “affordable” housing will still overall make the neighborhood richer, less diverse, and more expensive, as the new market-rate units would be so expensive and the “affordable” ones unaffordable to even a significant share of residents here.

The City has consistently lied about the impact the rezoning would have and who would be hurt by it. It's the lower-income tenant-renters, artists, seniors, and Chinatown residents who will be most hurt. Neighbors support an alternative plan for real affordable housing without displacement, oversized development, and big-box chain stores. Vote no.

Regards,
Kathy Slawinski
310 E 24th St
New York, NY 10010

From: [Kennedy Whitters](#)
To: [Land Use Testimony](#)
Subject: [EXTERNAL] Vote No on the SoHo/NoHo/Chinatown Upzoning Plan
Date: Wednesday, November 10, 2021 5:05:46 PM

To the City Council:

I strongly urge the City Council to vote no on the disastrous SoHo/NoHo/Chinatown upzoning plan.

This proposal would fulfill none of its affordable-housing promises, as it actually makes it more profitable to build without affordable housing than with. It will create huge incentives for destroying the hundreds of existing units of rent-regulated and loft-law affordable housing in the neighborhood, disproportionately occupied by lower-income, senior, artist, and Asian American residents, many of whom would be displaced.

It will push out arts and any other small businesses with its allowance for giant big-box retail of unlimited size. It will encourage grossly oversized development up to 2.5 times the size current rules allow, and more than 2.5 times the size of average buildings here now.

It will encourage the destruction of historic buildings, and allow developers to add luxury condos and apartments with no affordable housing so long as they don't exceed 25,000 sq ft per zoning lot. Even in this relatively wealthy neighborhood, new development even with the 25–30% “affordable” housing will still overall make the neighborhood richer, less diverse, and more expensive, as the new market-rate units would be so expensive and the “affordable” ones unaffordable to even a significant share of residents here.

The City has consistently lied about the impact the rezoning would have and who would be hurt by it. It's the lower-income tenant-renters, artists, seniors, and Chinatown residents who will be most hurt. Neighbors support an alternative plan for real affordable housing without displacement, oversized development, and big-box chain stores.

Vote no, please and thank you.

Regards,
Kennedy Whitters
[REDACTED]

Queens, NY 11415

From: [Laura Hoffmann](#)
To: [Land Use Testimony](#)
Subject: [EXTERNAL] NO to Soho/Noho Rezoning plan -Testimony for City Council November 9 Committee hearing
Date: Thursday, November 11, 2021 8:44:11 AM

I'm all for rezoning Soho/Noho from manufacturing to residential and retail, to help reflect the current situation.

However, I am extremely concerned by the idea of upzoning, and that of expanding the current retail-surface limit.

Not only would the unique architecture of the neighborhood be destroyed, but its unique economic diversity too. Many current residents living on very low income would be displaced as a matter of course, just because there'll be an added incentive for developers to erase existing three-storey houses for example and build up. The neighborhood will in fact be gentrified. I am vehemently opposed to the upzoning of Soho/Noho.

Thank you,

Laura Hoffmann

237 Lafayette St

From: [Gottesfeld, Linda](#)
To: [Land Use Testimony](#)
Subject: [EXTERNAL] Soho
Date: Thursday, November 11, 2021 8:33:22 AM

Another neighbor opposed to the reasoning of this treasured part of the city.
Not enough parks or schools to justify more developers projects. Hudson yards has plenty of empty apartments

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From: [Marc Hirschfeld](#)
To: [Land Use Testimony](#)
Subject: [EXTERNAL] Letter in opposition to the Soho/Noho zoning changes
Date: Wednesday, November 3, 2021 11:18:22 AM

I am strongly in opposition to the zoning changes in Noho/Soho that will do little or nothing to create affordable rentals in our neighborhood. Under the current proposal, there is no guarantee of ANY new affordable housing in the neighborhood that sorely lacks the economic and social diversity that made this historic district a lightning rod for visitors from around the world. I have lived in Soho, adjacent to Little Italy for close to 30 years. When I moved here it was a mix of artists, multi generations of Italians living and working in Little Italy and Chinese immigrants and their families. The small businesses that made Soho so alluring have been driven out by high rents and replaced by chain stores. Artists and galleries have been driven out of the neighborhood leaving empty storefronts that are being held off the market by landlords looking for a tenant who can afford their exorbitant rents. There are only a handful of businesses that remain to serve those who actually live and work in the community. There is only one grocery store within walking distance. The bodegas are disappearing. The proliferation of liquor licences at restaurants and bars are turning the neighborhood into Bourbon Street New Orleans. Take a look at the Lower East Side on any evening and you'll see what is in store for Soho Noho in just a couple of years.

Many of the residential apartments in the neighborhood are now owned by wealthy individuals who use them as pied-a'-terres. They rarely occupy their apartments for longer than a week or two, and when they do, aren't invested in the life of our neighborhood in any meaningful way. And as for the rental market? Landlords are not renting their affordable apartments to people who want to live in the neighborhood and become a part of the fabric that makes Soho/Noho special. Landlords make more money by renting them as short term AirBnBs to returning visitors and tourists resulting in less rental stock for potential residents who want to live here . Will rezoning change any of that? No, it will allow out-of-scale buildings in the historic district, create little or no low cost rental stock to increase diversity in the neighborhood and will be a financial windfall for developers who are salivating at the notion of building more luxury housing.

You need to look at this issue from 1000 feet. Rezoning will not address any of the problems I have mentioned above. The residents of Soho/Noho want change. We want a return to economic and ethnic diversity in our neighborhood that made it a great place to live. We are not clinging to the past but are looking to the future and embrace the notion that an intelligent approach to city planning can help create an equitable balance in a neighborhood that has been stripped of many of the things that made it so vibrant to begin with. Please reject this rezoning proposal and work with the RESIDENTS of Soho/Noho/Chinatown (who are the real stakeholders), not the

developers, to create solutions to this myriad of problems.

Thank you.

Marc Hirschfeld
Lafayette Street
New York City

From: [Margo S. Margolis](#)
To: [Land Use Testimony](#)
Subject: [EXTERNAL] Opposition to SoHo/NoHo/Chinatown upzoning
Date: Wednesday, November 10, 2021 7:39:13 PM

To Council Members:

I am speaking today in opposition to this disastrous plan to upzone SoHo, NoHo and Chinatown. My name is Margo Margolis, and I am a certified artist. I have lived, worked, and raised a family here. When I moved here in 1972 SoHo was an abandoned area. At that time NYC was in a recession and people were fleeing the city. It was artists that created a grassroots, evolving community here and it was SoHo that firmly established New York as the preeminent cultural capital of the world. SoHo is studied, emulated, and known world-wide for its successful adaptive re-use of industrial space, its densely layered history, its iconic architecture, and its cultural presence then and now. All these factors have made SoHo a global destination and a huge economic engine for the city. This could all be destroyed by the city's plan. Here are some of the problems.

1. The city claims this will create affordable housing yet there is no guarantee that one unit of affordable housing will be built. There are so many loopholes that will prevent this and favor instead the construction of commercial space, offices, NYU dorms and large, big box stores and restaurants.
2. The proposed increase in the size of buildings will incentivize developers to demolish buildings and displace small local businesses, artists, low-income tenants and Asian Americans. Presently there are 635 units of rent regulated and loft law affordable housing that could be lost.
3. I am afraid I and other seniors who are aging in place could be forced to leave. I wonder if the Department of Aging has been consulted. Surprisingly, the Mayor has created “Age-Friendly NYC: New Commitments For a City For All Ages” but this plan would do the opposite-displace people from their homes and neighborhoods.
4. Furthermore, the city has not addressed the mechanism for conversion. It is near impossible to convert JLWQA to residential as the building codes are different and incompatible. Even where possible, conversions would take an exorbitant outlay of money per unit plus a total evacuation of the building. JLWQA was created specifically for the manufacturing floor plate and its joint

live work design.

5.The city lists as potential sites for development 29 landmarked buildings in the SoHo National Historic District. to be demolished and replaced with out of scale towers. This is demolition of historic buildings recognized at the city, state and federal level. There are buildings dating back to the early 1800s. SoHo has the largest concentration of cast-iron buildings in the world. It is heartbreaking to imagine the potential destruction and for what; this plan is for Erasing history and culture, displacing hundreds of long-time residents to create a big, expensive mall with luxury housing.

If New York is to fully recover from the pandemic, it is necessary to preserve what is unique and authentic here and not turn this into just another “placeless place.” Please see this article about supporting small local businesses:

<https://www.nytimes.com/2021/04/02/nyregion/pearl-river-new-york-landlords.html>

I ask you to please vote NO!

Sincerely

Margo Margolis

16 Crosby Street

New York, New York 10013

From: [Marion Howard](#)
To: [Land Use Testimony](#)
Subject: [EXTERNAL] Vote No on the SoHo/NoHo/Chinatown Upzoning Plan
Date: Wednesday, November 3, 2021 12:01:27 AM

To the City Council:

Please, vote no on the SoHo/NoHo/Chinatown rezoning plan. We are selling the soul of our historic districts to developers. The aesthetics of these neighborhoods will be altered forever so that they can turn a profit. Long term residents of New York City deserve to have a say in these irrevocable decisions - they should not be decreed by the current administration and whomever is donating to their campaigns.

This proposal would fulfill none of its affordable-housing promises, as it actually makes it more profitable to build without affordable housing than with. It will create huge incentives for destroying the hundreds of existing units of rent-regulated and loft-law affordable housing in the neighborhood, disproportionately occupied by lower-income, senior, artist, and Asian American residents, many of whom would be displaced. It will push out arts and any other small businesses with its allowance for giant big-box retail of unlimited size. It will encourage grossly oversized development up to 2.5 times the size current rules allow, and more than 2.5 times the size of average buildings here now. It will encourage the destruction of historic buildings, and allow developers to add luxury condos and apartments with no affordable housing so long as they don't exceed 25,000 sq ft per zoning lot. Even in this relatively wealthy neighborhood, new development even with the 25–30% “affordable” housing will still overall make the neighborhood richer, less diverse, and more expensive, as the new market-rate units would be so expensive and the “affordable” ones unaffordable to even a significant share of residents here.

The City has consistently lied about the impact the rezoning would have and who would be hurt by it. It's the lower-income tenant-renters, artists, seniors, and Chinatown residents who will be most hurt. Neighbors support an alternative plan for real affordable housing without displacement, oversized development, and big-box chain stores. Vote no.

Regards,
Marion Howard
11 5th Ave
New York, NY 10003

From: [Marion Lee](#)
To: [Chin; District2](#)
Cc: [Drummond, Anthony](#); [Fung, Cora](#); [District2](#); [Cehonski, Irak](#); [Speaker Corey Johnson](#); [Bottcher, Erik](#); [Comerford, Patrice](#); [Office of Council Member Powers](#); [Levine, Mark](#); [Lander, Brad](#); [AskJB](#); [Salamanca, Rafael](#); [Moya, Francisco](#); [glickd@assembly.state.ny.us](#); [Helen@HelenRosenthal.com](#); [District7](#); [Ayala, Diana](#); [D09Perkins](#); [Rodriguez, Ydanis](#); [Dinowitz](#); [Gonaj, Mark](#); [Cabrera, Fernando](#); [District16Bronx](#); [Diaz, Ruben](#); [District19](#); [Koo, Peter](#); [Costa Constantinides](#); [Grodenchik, Barry S.](#); [Dromm, CM](#); [Van Bramer, Jimmy](#); [Adams](#); [Koslowitz, CM](#); [District30](#); [Ulrich, Eric](#); [Levin, Stephen](#); [Reynoso, Antonio](#); [Cumbo, Laurie](#); [Corney, Robert](#); [District37](#); [info38](#); [Council Member Lander](#); [Eugene, Mathieu](#); [District41](#); [Barron, Inez](#); [AskKalman](#); [District45](#); [Maisel, Alan](#); [Treyger, Mark](#); [Deutsch, Chaim](#); [Rose, Deborah](#); [Matteo, Steven](#); [Joseph Borelli](#); [joddo@statenislandusa.com](#); [BKallos@BenKallos.com](#)
Subject: [EXTERNAL] In Opposition to Soho Upzoning
Date: Tuesday, November 9, 2021 9:52:23 PM

Dear Councilwoman Chin,

Please reject the proposed Upzoning Plan of Soho/Noho, and help us preserve our unique historical neighborhood.

I am a long-time resident of Soho. I came to Soho in 1976 in my mid-twenties, rented a loft space from an artist friend on Mercer Street, and went to work as a bank clerk. I still live within a half block of that original address. My family is interracial. My daughter, granddaughter and even a great-grandchild have attended our local schools. I'm the co-owner of a women-owned business at Spring and Mercer since 1990. During the 1970's, my family flourished in the ambience of avant-garde galleries, strains of Steve Reich's mallet music floating out over Broome Street, conceptual art jokes like the stuffed python encircling the fire hydrant at Prince and West Broadway. As more people discovered Soho and population increased, real estate prices rose and some artists moved on - but not all. As neighbors changed , new friends joined our community to share the relaxed Soho ambience, cobblestone streets and glorious architecture of our mid-1800 cast-iron buildings.

As Jane Jacobs wrote in a letter to New York City Mayor Robert Wagner in 1955, in opposition to a proposal by Robert Moses to put a 4-lane highway through Washington Square Park: "It is very discouraging to do our best to make the city more habitable and then to learn that the city is thinking up schemes to make it uninhabitable." Thankfully, in 1969, Jane Jacobs and her activists, prevailed against Robert Moses who since the mid-1940's had been trying to enact the LOMEX plan that would have connected the Holland Tunnel with the Williamsburg and Manhattan bridges, leveling 14 blocks of Soho and Little Italy in the process. Mayor John Lindsay let the proposal lapse in 1969 and Gov Nelson Rockefeller shelved it once and for all in 1971 due to concerns about pollution. Haven't we learned our lesson? Do we really need these so-called innovations? Help us preserve our New York neighborhoods for the residents who live here, and the tourists who visit, instead of imposing "improvements" that detract from the habitability and enjoyability of our home.

I oppose the Upzoning Plan for the following reasons:

1. It imposes a punitive flip tax on residents to convert from current "artist living-quarters"

- zoning to straight residential use,
- 2. It legalizes destination big-box retail, putting displacement pressure on small, creative businesses and local retail stores
 - 3. It allows the influx of huge restaurants, bars and nightclubs, including entertainment space outdoors and on roofs
 - 4. It encourages new construction of office towers 2-1/2 times the size of the average SoHo/NoHo building
 - 5. It is the first upzoning of an historic district since the Landmarks Preservation Commission was created in 1965
 - 6. It will encourage demolition of historic buildings
 - 7. Loopholes fail to guarantee that a single unit of affordable housing will ever be built, while encouraging luxury residential construction
 - 8. Resulting gentrification will put tremendous displacement pressure on low-income, rent-stabilized, Asian-American tenants in Chinatown, as well as loft tenants in SoHo/NoHo
 - 9. It is a lame-duck giveaway to de Blasio's real-estate donors, like Edison Parking, which owns the two largest development sites in the proposal
 - 10. It will legalize the expansion of NYU into SoHo, something NYU agreed never to do
 - 11. The community has prepared a plan that will allow for affordable housing but not by permitting high-rise towers

Respectfully,

Marion Lee

Marion Lee

Principal

ASG Mortgage Services, Inc.

99 Spring Street, Suite 600

New York NY 10012

(Tel) 212-966-0009

(Cell) 917-922-2379

marion_lee@asgcompanies.com

From: [Mark Benjamin](#)
To: [Land Use Testimony](#)
Subject: [EXTERNAL] Vote No on the SoHo/NoHo/Chinatown Upzoning Plan
Date: Wednesday, November 3, 2021 12:24:36 AM

To the City Council:

I strongly urge the City Council to vote no on the disastrous SoHo/NoHo/Chinatown upzoning plan. This proposal would fulfill none of its affordable-housing promises, as it actually makes it more profitable to build without affordable housing than with. It will create huge incentives for destroying the hundreds of existing units of rent-regulated and loft-law affordable housing in the neighborhood, disproportionately occupied by lower-income, senior, artist, and Asian American residents, many of whom would be displaced. It will push out arts and any other small businesses with its allowance for giant big-box retail of unlimited size. It will encourage grossly oversized development up to 2.5 times the size current rules allow, and more than 2.5 times the size of average buildings here now. It will encourage the destruction of historic buildings, and allow developers to add luxury condos and apartments with no affordable housing so long as they don't exceed 25,000 sq ft per zoning lot. Even in this relatively wealthy neighborhood, new development even with the 25–30% “affordable” housing will still overall make the neighborhood richer, less diverse, and more expensive, as the new market-rate units would be so expensive and the “affordable” ones unaffordable to even a significant share of residents here.

The City has consistently lied about the impact the rezoning would have and who would be hurt by it. It's the lower-income tenant-renters, artists, seniors, and Chinatown residents who will be most hurt. Neighbors support an alternative plan for real affordable housing without displacement, oversized development, and big-box chain stores. Vote no.

Regards,
Mark Benjamin
712 Broadway
New York, NY 10003

From: [Mark Howard](#)
To: [Land Use Testimony](#)
Subject: [EXTERNAL] Vote No on the SoHo/NoHo/Chinatown Upzoning Plan
Date: Wednesday, November 3, 2021 1:56:37 AM

To the City Council:

I strongly urge the City Council to vote no on the disastrous SoHo/NoHo/Chinatown upzoning plan. This proposal would fulfill none of its affordable-housing promises, as it actually makes it more profitable to build without affordable housing than with. It will create huge incentives for destroying the hundreds of existing units of rent-regulated and loft-law affordable housing in the neighborhood, disproportionately occupied by lower-income, senior, artist, and Asian American residents, many of whom would be displaced. It will push out arts and any other small businesses with its allowance for giant big-box retail of unlimited size. It will encourage grossly oversized development up to 2.5 times the size current rules allow, and more than 2.5 times the size of average buildings here now. It will encourage the destruction of historic buildings, and allow developers to add luxury condos and apartments with no affordable housing so long as they don't exceed 25,000 sq ft per zoning lot. Even in this relatively wealthy neighborhood, new development even with the 25–30% “affordable” housing will still overall make the neighborhood richer, less diverse, and more expensive, as the new market-rate units would be so expensive and the “affordable” ones unaffordable to even a significant share of residents here.

The City has consistently lied about the impact the rezoning would have and who would be hurt by it. It's the lower-income tenant-renters, artists, seniors, and Chinatown residents who will be most hurt. Neighbors support an alternative plan for real affordable housing without displacement, oversized development, and big-box chain stores. Vote no.

Regards,
Mark Howard
11 5th Ave
New York, NY 10003

From: [Mary Clarke](#)
To: [Land Use Testimony](#)
Subject: [EXTERNAL] Soho Noho Chinatown plan written testimony
Date: Wednesday, November 10, 2021 12:08:15 PM

There is no—repeat, ZERO—guarantee that any affordable housing will be created under this plan.

Adding insult to injury, that “suite of stronger tenant-protection laws” touted by DCP will not protect the EXISTING affordable rent-regulated housing in SoHo, NoHo, and Chinatown.

As we've heard from Met Council's Michael McKee, with a greater FAR, tenants living small, rent-regulated buildings (like mine) risk displacement unless demolition loopholes are closed. Living in a historic building in a historic district no longer offers protection.

Example 1: Across the street from me on Bond St is a circa 1830 Federal rowhouse that houses so-called "protected" tenants. One might think its small size protects it from demolition, but directly next to this structure is a 40 to 50-foot wide non-contributing building the DCP has mapped as a projected or potential development site.

Example 2: Further down the block stand two more 4-story historic dwellings, one next to the other, again, both housing long-time artist tenants, now seniors. Demolishing both structures and rebuilding a 50-foot-wide condo on this—arguably NoHo's marquee block—is doubtless a tasty proposition for a developer.

I am a 71-year-old certified artist, who has lived in my NoHo building since 1979. I wish to age in place. I am against the rezoning plan as presented. I am NOT against rezoning and I am in favor of building more affordable housing in SoHo, NoHo and Chinatown.

We need a better plan.

Thank you for your consideration.

Mary Clarke
52 Bond St.
NYC 10012

From: [Max Melamed](#)
To: [Land Use Testimony](#)
Subject: [EXTERNAL] In Support of SoHo/NoHo Rezoning
Date: Friday, November 12, 2021 10:51:15 AM

Hi there, my name is Max Melamed and I am a resident of Manhattan CD2.

I am writing to express my strong support of the SoHo/NoHo rezoning—New York badly needs more mixed-income housing, and SoHo and NoHo are precisely the kinds of high-opportunity, transit-rich neighborhoods where it ought to be built.

Not allowing development in SoHo will increase displacement pressures in surrounding areas. I live on the outskirts of SoHo, and I have seen first-hand how lack of supply in SoHo proper has driven up rents and displaced existing residents.

I would also ask the City Council to make two changes to the plan—while I support the added density for housing, its proposed commercial densities are too high. There is a risk that developers will choose to build only office space, as offices could be leased at wholly market-rates, and would not need to provide affordable housing.

I also believe the City should change its community preference policy for this rezoning, to allow residents of the Lower East Side and Chinatown, or the City more broadly, to have equal access to the affordable apartments as would residents of Community District 2.

Lastly, I would ask the City Council to require the deepest possible level of affordability for the below-market apartments. I hope this rezoning can be a force for racial and socioeconomic integration in two of Manhattan's most segregated neighborhoods, and ensuring subsidized apartments are affordable to the income brackets where they are most sorely needed would go a long way towards doing so.

Thank you for considering my written testimony.

Best,
Max Melamed

From: [michele campo](#)
To: [Land Use Testimony](#)
Subject: [EXTERNAL] Vote No on the SoHo/NoHo/Chinatown Upzoning Plan
Date: Wednesday, November 3, 2021 11:31:10 PM

To the City Council:

I strongly urge the City Council to vote no on the disastrous SoHo/NoHo/Chinatown upzoning plan. This proposal would fulfill none of its affordable-housing promises, as it actually makes it more profitable to build without affordable housing than with. It will create huge incentives for destroying the hundreds of existing units of rent-regulated and loft-law affordable housing in the neighborhood, disproportionately occupied by lower-income, senior, artist, and Asian American residents, many of whom would be displaced. It will push out arts and any other small businesses with its allowance for giant big-box retail of unlimited size. It will encourage grossly oversized development up to 2.5 times the size current rules allow, and more than 2.5 times the size of average buildings here now. It will encourage the destruction of historic buildings, and allow developers to add luxury condos and apartments with no affordable housing so long as they don't exceed 25,000 sq ft per zoning lot. Even in this relatively wealthy neighborhood, new development even with the 25–30% “affordable” housing will still overall make the neighborhood richer, less diverse, and more expensive, as the new market-rate units would be so expensive and the “affordable” ones unaffordable to even a significant share of residents here.

The City has consistently lied about the impact the rezoning would have and who would be hurt by it. It's the lower-income tenant-renters, artists, seniors, and Chinatown residents who will be most hurt. Neighbors support an alternative plan for real affordable housing without displacement, oversized development, and big-box chain stores. Vote no.

Regards,
michele campo
184 Bowery
New York, NY 10012

From: [Nancy Kremsdorf](#)
To: [Land Use Testimony](#)
Subject: [EXTERNAL] Vote No on the SoHo/NoHo/Chinatown Upzoning Plan
Date: Friday, November 12, 2021 6:18:48 AM

To the City Council:

I strongly urge the City Council to vote no on the disastrous SoHo/NoHo/Chinatown upzoning plan. This proposal would fulfill none of its affordable-housing promises, as it actually makes it more profitable to build without affordable housing than with. It will create huge incentives for destroying the hundreds of existing units of rent-regulated and loft-law affordable housing in the neighborhood, disproportionately occupied by lower-income, senior, artist, and Asian American residents, many of whom would be displaced. It will push out arts and any other small businesses with its allowance for giant big-box retail of unlimited size. It will encourage grossly oversized development up to 2.5 times the size current rules allow, and more than 2.5 times the size of average buildings here now. It will encourage the destruction of historic buildings, and allow developers to add luxury condos and apartments with no affordable housing so long as they don't exceed 25,000 sq ft per zoning lot. Even in this relatively wealthy neighborhood, new development even with the 25–30% “affordable” housing will still overall make the neighborhood richer, less diverse, and more expensive, as the new market-rate units would be so expensive and the “affordable” ones unaffordable to even a significant share of residents here.

The City has consistently lied about the impact the rezoning would have and who would be hurt by it. It's the lower-income tenant-renters, artists, seniors, and Chinatown residents who will be most hurt. Neighbors support an alternative plan for real affordable housing without displacement, oversized development, and big-box chain stores. Vote no.

Regards,
Nancy Kremsdorf
37 W 12th St
New York, NY 10011

From: [Nancy Myers](#)
To: [Land Use Testimony](#)
Subject: [EXTERNAL] Vote No on the SoHo/NoHo/Chinatown Upzoning Plan
Date: Thursday, November 11, 2021 7:42:27 PM

To the City Council:

I strongly urge the City Council to vote no on the disastrous SoHo/NoHo/Chinatown upzoning plan. This proposal would fulfill none of its affordable-housing promises, as it actually makes it more profitable to build without affordable housing than with. It will create huge incentives for destroying the hundreds of existing units of rent-regulated and loft-law affordable housing in the neighborhood, disproportionately occupied by lower-income, senior, artist, and Asian American residents, many of whom would be displaced. It will push out arts and any other small businesses with its allowance for giant big-box retail of unlimited size. It will encourage grossly oversized development up to 2.5 times the size current rules allow, and more than 2.5 times the size of average buildings here now. It will encourage the destruction of historic buildings, and allow developers to add luxury condos and apartments with no affordable housing so long as they don't exceed 25,000 sq ft per zoning lot. Even in this relatively wealthy neighborhood, new development even with the 25–30% “affordable” housing will still overall make the neighborhood richer, less diverse, and more expensive, as the new market-rate units would be so expensive and the “affordable” ones unaffordable to even a significant share of residents here.

The City has consistently lied about the impact the rezoning would have and who would be hurt by it. It's the lower-income tenant-renters, artists, seniors, and Chinatown residents who will be most hurt. Neighbors support an alternative plan for real affordable housing without displacement, oversized development, and big-box chain stores. Vote no.

Regards,
Nancy Myers
69 Bank St
New York, NY 10014

From: [Nancy Idaka Sheran](#)
To: [Land Use Testimony](#)
Cc: [Nancy Idaka Sheran](#); [Office of Council Member Powers](#); [MBP Info](#); [District2](#); [District3](#)
Subject: [EXTERNAL] I oppose the SoHo/NoHo Neighborhood Upzoning Plan
Date: Wednesday, November 3, 2021 3:46:13 PM

I oppose the SoHo/NoHo Neighborhood Plan, to upzone the SoHo/NoHo neighborhood. This diverse and successful neighborhood is not in need of "urban renewal." Urban engineering through upzoning has resulted in less diversity, less affordability and more gentrification. Having more density along Canal Street and other large streets in the SoHo/NoHo neighborhood will only increase traffic congestion problems which are already horrible, especially along Canal Street and at bridge and tunnel entrances and exits at the East River and Hudson River. This area is beloved "as is" by tourists and people coming in from other places. Don't kill the goose that lays the golden eggs!

More weight should be given to the plan developed by the SoHo/NoHo neighborhood, which would maintain the character of this destination neighborhood, while creating more affordable housing.

Nancy Sheran
137 E 36th St
Apt [REDACTED]
New York, NY 10016

From: [Nathan Werksman](#)
To: [Land Use Testimony](#)
Subject: [EXTERNAL] Emailing in favor of SoHo/NoHo rezoning
Date: Friday, November 12, 2021 10:34:24 AM

Hi, my name is Nathan Werksman and I am a resident of NYC.

I am writing to express my strong support of the SoHo/NoHo rezoning—New York badly needs more mixed-income housing, and SoHo and NoHo are precisely the kinds of high-opportunity, transit-rich neighborhoods where it ought to be built.

I would also ask the City Council to make two changes to the plan—while I support the added density for housing, its proposed commercial densities are too high. There is a risk that developers will choose to build only office space, as offices could be leased at wholly market-rates, and would not need to provide affordable housing.

I also believe the City should change its community preference policy for this rezoning, to allow residents of the Lower East Side and Chinatown, or the City more broadly, to have equal access to the affordable apartments as would residents of Community Board 2.

Lastly, I would ask the City Council to require the deepest possible level of affordability for the below-market apartments. I hope this rezoning can be a force for racial and socioeconomic integration in two of Manhattan's most segregated neighborhoods, and ensuring subsidized apartments are affordable to the income brackets where they are most sorely needed would go a long way towards doing so.

Thank you for considering my written testimony.

Sincerely,

Nathan

--
Nathan E. Werksman
e. nathanwerksman@gmail.com
c. [REDACTED]

From: [Nydia Leaf](#)
To: [Land Use Testimony](#)
Subject: [EXTERNAL] Vote No on the SoHo/NoHo/Chinatown Upzoning Plan
Date: Wednesday, November 3, 2021 12:55:41 AM

To the City Council:

I strongly urge the City Council to vote no on the disastrous SoHo/NoHo/Chinatown upzoning plan. This proposal would fulfill none of its affordable-housing promises, as it actually makes it more profitable to build without affordable housing than with. It will create huge incentives for destroying the hundreds of existing units of rent-regulated and loft-law affordable housing in the neighborhood, disproportionately occupied by lower-income, senior, artist, and Asian American residents, many of whom would be displaced. It will push out arts and any other small businesses with its allowance for giant big-box retail of unlimited size. It will encourage grossly oversized development up to 2.5 times the size current rules allow, and more than 2.5 times the size of average buildings here now. It will encourage the destruction of historic buildings, and allow developers to add luxury condos and apartments with no affordable housing so long as they don't exceed 25,000 sq ft per zoning lot. Even in this relatively wealthy neighborhood, new development even with the 25–30% “affordable” housing will still overall make the neighborhood richer, less diverse, and more expensive, as the new market-rate units would be so expensive and the “affordable” ones unaffordable to even a significant share of residents here.

The City has consistently lied about the impact the rezoning would have and who would be hurt by it. It's the lower-income tenant-renters, artists, seniors, and Chinatown residents who will be most hurt. Neighbors support an alternative plan for real affordable housing without displacement, oversized development, and big-box chain stores. Vote no.

Regards,
Nydia Leaf
46 W 95th St
New York, NY 10025

From: [Pamela Jerome](#)
To: [Land Use Testimony](#)
Subject: [EXTERNAL] Vote No on the SoHo/NoHo/Chinatown Upzoning Plan
Date: Wednesday, November 3, 2021 1:58:52 AM

To the City Council:

I strongly urge the City Council to vote no on the disastrous SoHo/NoHo/Chinatown upzoning plan. This proposal would fulfill none of its affordable-housing promises, as it actually makes it more profitable to build without affordable housing than with. It will create huge incentives for destroying the hundreds of existing units of rent-regulated and loft-law affordable housing in the neighborhood, disproportionately occupied by lower-income, senior, artist, and Asian American residents, many of whom would be displaced. It will push out arts and any other small businesses with its allowance for giant big-box retail of unlimited size. It will encourage grossly oversized development up to 2.5 times the size current rules allow, and more than 2.5 times the size of average buildings here now. It will encourage the destruction of historic buildings, and allow developers to add luxury condos and apartments with no affordable housing so long as they don't exceed 25,000 sq ft per zoning lot. Even in this relatively wealthy neighborhood, new development even with the 25–30% “affordable” housing will still overall make the neighborhood richer, less diverse, and more expensive, as the new market-rate units would be so expensive and the “affordable” ones unaffordable to even a significant share of residents here.

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Regards,
Pamela Jerome
594 Broadway
New York, NY 10012

From: [Paul Bowden](#)
To: [Land Use Testimony](#)
Subject: [EXTERNAL] Vote No on the SoHo/NoHo/Chinatown Upzoning Plan
Date: Wednesday, November 3, 2021 4:30:58 AM

To the City Council:

I strongly urge the City Council to vote no on the disastrous SoHo/NoHo/Chinatown upzoning plan. This proposal would fulfill none of its affordable-housing promises, as it actually makes it more profitable to build without affordable housing than with. It will create huge incentives for destroying the hundreds of existing units of rent-regulated and loft-law affordable housing in the neighborhood, disproportionately occupied by lower-income, senior, artist, and Asian American residents, many of whom would be displaced. It will push out arts and any other small businesses with its allowance for giant big-box retail of unlimited size. It will encourage grossly oversized development up to 2.5 times the size current rules allow, and more than 2.5 times the size of average buildings here now. It will encourage the destruction of historic buildings, and allow developers to add luxury condos and apartments with no affordable housing so long as they don't exceed 25,000 sq ft per zoning lot. Even in this relatively wealthy neighborhood, new development even with the 25–30% “affordable” housing will still overall make the neighborhood richer, less diverse, and more expensive, as the new market-rate units would be so expensive and the “affordable” ones unaffordable to even a significant share of residents here.

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Regards,
Paul Bowden
139 Wooster St
New York, NY 10012

From: Ace4cc
To: Land Use Testimony; Drummond, Anthony; Fung, Cora; District2; Rivera, Carlina; Cehonski, Irak; Speaker Corey Johnson; Bottcher, Erik; Comerford, Patrice; Office of Council Member Powers; Levine, Mark; Lander, Brad; AskJB; Salamanca, Rafael; Moya, Francisco; glickd@assembly.state.ny.us; Helen@helenrosenthal.com; District7; Avala, Diana; D09Perkins; Rodriguez, Ydanis; Dinowitz, Goniaj, Mark; Cabrera, Fernando; District16Bronx; Diaz, Ruben; District19; Koo, Peter; Costa Constantiades; Grodenchik, Barry S.; Dromm, CM; Van Bramer, Jimmy; Adams; Koslowitz, CM; District30; Ulrich, Eric; Levin, Stephen; Reynoso, Antonio; Cumbo, Laurie; Corney, Robert; District37; info38; Council Member Lander; Eugene, Mathieu; District41; Barron, Inez; AskKalman; District45; Maisel, Alan; Treyger, Mark; Deutsch, Chaim; Rose, Deborah; Matteo, Steven; Joseph Borelli; joddo@staterislandusa.com; BKallos@benkallos.com
Subject: [EXTERNAL] Vote no Chin's punitive plan
Date: Wednesday, December 8, 2021 9:30:53 AM

Intro 2443-2021 please vote no

Dear council,

I'm a longtime resident of NYC and soho and I have never been so disappointing in our elected officials. Margaret Chin's insane legislation is a last minute effort to win the hearts of developers and retailers at the expense of her constituents. She is selling us out on her way out for nothing. This is criminal and insane and sets a dangerous precedent. She didn't speak to residents, and her team was callous and lazy about drafting this. The unintended consequences will destroy our neighborhood Who has the right to apply fines based on your chosen career ?We've all had enough issues through Covid to stay afloat and this is completely insane.

Please vote no, prove we still have decent elected officials. You don't owe her any favors, think about the people first

Best
R Jaber

From: [Rachel Lavine](#)
To: [District2](#)
Cc: info@sohoalliance.org; coordinator@humanscale.nyc; [Erik Bottcher](#); [Speaker Corey Johnson](#); [Richard J. Corman](#); [Cameron Krause](#); MrsFitzny@gmail.com; [Chris Marte](#)
Subject: [EXTERNAL] Please Reject Mayor de Blasio's plan to Upzone Chinatown and Soho
Date: Tuesday, November 9, 2021 7:06:05 PM

Dear Councilmember Rivera,

I write as the State Committeewoman for the 66th A.D. and a lifelong New Yorker to oppose Mayor de Blasio's proposed plan to upzone Soho and Chinatown, and to urge you to reject this deeply problematic proposal.

What makes a city great? According to the renowned urban planner Jane Jacobs, it is the accessibility, variety, and scale of buildings for business and residential use, which in turn enables a true diversity of people, organizations, and professions that make a city a truly vibrant, evolving, and healthy habitat that serves the needs of **all** of its residents.

Conversely, neighborhood development that serves only one group or one goal can kill a neighborhood's soul and eventually the city itself. Who can forget Robert Caro's plan to put a highway through Washington Square Park, the very heart of the Village? What would our community be like today had he succeeded? We all understand that life is change and that cities change as well. But there is an important difference between change and demolition. And shouldn't the change we support be for the general good?

Decent affordable housing is a pressing need for many New Yorkers. But ravaging SoHo and Chinatown to achieve that goal will only eviscerate two historic neighborhoods -- home to extraordinary artistic and immigrant communities -- without any guarantee of increased affordable housing. In fact, due to existing loopholes, the plan fails to guarantee that a single unit of affordable housing will ever be built, while encouraging luxury residential construction. Thus, we are confronted with the possibility that existing affordable housing may be destroyed, without being replaced much less increased. Just as troubling, **there is no specific guarantee that the supposed tax revenues derived from upzoning will in fact be channeled back into affordable housing units.**

By legalizing destination big-box retail, which already exists throughout the city, this plan puts displacement pressure on small, creative businesses and local retail stores. And by allowing – indeed encouraging – the influx of huge restaurants, bars and nightclubs, including entertainment space outdoors and on roofs, the proposal disrespects the residential nature of the communities that are already in place.

Encouraging new construction of office towers 2-1/2 times the size of the average SoHo/NoHo building, will ultimately change the entire landscape of SoHo, Noho and Chinatown – and also

significantly decrease light and air. As a Village resident, I have experienced first-hand how huge new buildings – which often remain vacant for months and years – have truly changed much of our neighborhood. What used to be busy, vibrant streetscapes are now desolate urban corridors. At night, I hurry past boarded up store fronts and buildings that have been converted to dorms, worried that there are no bystanders to help if something were to happen. A neighborhood without neighbors is truly just an urban mall, a soulless place.

Jane Jacob famously said that people living in their neighborhoods understand best what the community needs. Here the community understands that proposed upzoning will result in damaging gentrification that will put huge displacement pressure on low-income, rent-stabilized, Asian-American tenants in Chinatown, as well as loft tenants in SoHo/NoHo. And it also understands that it can not only consider its own needs, but also those of other New Yorkers -- which is why it has created its own affordable housing plan, one that does not require a wholesale gutting of the existing community.

We now know that there will be a tremendous amount of infrastructure money coming to New York. This money will enable us to create inclusive and beautiful neighborhoods that do not sacrifice the historic to build the new, that will serve people, not profit. We can have a future that does not require destruction of our past.

I respectfully request that you oppose this plan and ensure that your colleagues vote it down.

Sincerely,

Rachel Lavine
37 West 12th Street
NY NY 10011

From: [Rachel Lavine](#)
To: [Chin](#)
Cc: [Johnson, Corey](#); [info@sohoalliance.org](#); [Richard J. Corman](#); [DOWNTOWN INDEPENDENT DEMOCRATS](#); [Chris Marte](#); [MrsFitzny@gmail.com](#); [Cameron Krause](#); [Erik Bottcher](#)
Subject: [EXTERNAL] Please reject Mayor de Blasio's proposed plan to upzone Soho and Chinatown
Date: Tuesday, November 9, 2021 7:00:31 PM

Dear Councilmember Chin,

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I respectfully request that you oppose this plan and ensure that your colleagues vote it down.

Sincerely,

Rachel Lavine
37 West 12th Street
NY NY 10011

From: [Rachel Mauro](#)
To: [Land Use Testimony](#); [Chin](#); [District2](#)
Cc: glickd@assembly.state.ny.us; [Drummond, Anthony](#); [Fung, Cora](#); [Speaker Corey Johnson](#); [Bottcher, Erik](#); [Comerford, Patrice](#); [Office of Council Member Powers](#); [Levine, Mark](#); [Lander, Brad](#); [AskJB](#); [Salamanca, Rafael](#); [Moya, Francisco](#); Helen@HelenRosenthal.com; [District7](#); [Ayala, Diana](#); [D09Perkins](#); [Rodriguez, Ydanis](#); [Dinowitz](#); [Gianj, Mark](#); [Cabrera, Fernando](#); [District16Bronx](#); [Diaz, Ruben](#); [District19](#); [Koo, Peter](#); [Costa Constantinides](#); [Grodenchik, Barry S.](#); [Dromm, CM](#); [Van Bramer, Jimmy](#); [Adams](#); [Koslowitz, CM](#); [District30](#); [Ulrich, Eric](#); [Levin, Stephen](#); [Reynoso, Antonio](#); [Cumbo, Laurie](#); [Corney, Robert](#); [District37](#); [info38](#); [Council Member Lander](#); [Eugene, Mathieu](#); [District41](#); [Barron, Inez](#); [AskKalman](#); [District45](#); [Maisel, Alan](#); [Treyger, Mark](#); [Deutsch, Chaim](#); [Rose, Deborah](#); [Matteo, Steven](#); Joseph.Borelli@statenislandusa.com; BKallos@BenKallos.com
Subject: [EXTERNAL] Noho/SoHo Plan - Vote No
Date: Friday, November 12, 2021 9:26:32 AM

To the Land Use Committee, Council members Chin and Rivera, et. al.:

On behalf of 40 Great Jones Corp, a JLWQA building in NoHo with 6 JLWQA units, we write today in opposition to the proposed up-zoning of SoHo/NoHo. In addition we are also members of NoHo Bowery Stakeholders. We sincerely appreciate the hard work that our indefatigable president Zella Jones has undertaken on behalf of NoHo Bowery Stakeholders as a member of the Advisory Group to the Envision Process and beyond, up until the 11th hour where we find ourselves today. We are aware that she is currently working with many entities to try to find fixes to some of the most vexing issues inherent in the plan. Having said this, we have arrived at the conclusion that too many unanswered questions remain at this point in time for you, our members of the City Council, to cast your vote on your constituent's behalf in the affirmative for this deeply flawed plan. In its current state it does nothing to truly address the inequities of our affordable housing crisis, nor does it adequately address the mind bogglingly complex issues of what this would mean for our unique neighborhood. Many others before us have spoken and written eloquently about the particulars of these issues. We will not bore you here with a laundry list of each one of them. Instead, we would like to remind you that this process began in 2018 with the premise that the needs and concerns of the resident stakeholders would be taken under consideration and addressed in the plan. Instead, here we are all these many months later with NO MECHANISM for JLWQA to become legalized. In the plan itself presented for approval under the heading "JLWQA Pathways" on page 44, it is written in bold red letters " MECHANISM TBD". How, at this late date, with no realistic mechanism still on the table – or time to properly study anything that might be proposed - can you possibly vote to approve this plan? We all agree that change is needed. We all agree that affordable housing is paramount. But this plan is too deeply flawed to fix that. What is the rush?

Please, we implore you, let's go back to the drawing board in the new year and find a workable solution instead of pushing through this plan.

Thank you.

RachelMauro
VanceTrimble
40 Great Jones Street

New York, NY 10012



From: [Richard Ayotte](#)
To: [Land Use Testimony](#)
Subject: [EXTERNAL] Vote No on the SoHo/NoHo/Chinatown Upzoning Plan
Date: Thursday, November 11, 2021 2:34:45 PM

To the City Council:

I strongly urge the City Council to vote no on the disastrous SoHo/NoHo/Chinatown upzoning plan. This proposal would fulfill none of its affordable-housing promises, as it actually makes it more profitable to build without affordable housing than with. It will create huge incentives for destroying the hundreds of existing units of rent-regulated and loft-law affordable housing in the neighborhood, disproportionately occupied by lower-income, senior, artist, and Asian American residents, many of whom would be displaced. It will push out arts and any other small businesses with its allowance for giant big-box retail of unlimited size. It will encourage grossly oversized development up to 2.5 times the size current rules allow, and more than 2.5 times the size of average buildings here now. It will encourage the destruction of historic buildings, and allow developers to add luxury condos and apartments with no affordable housing so long as they don't exceed 25,000 sq ft per zoning lot. Even in this relatively wealthy neighborhood, new development even with the 25–30% "affordable" housing will still overall make the neighborhood richer, less diverse, and more expensive, as the new market-rate units would be so expensive and the "affordable" ones unaffordable to even a significant share of residents here.

The City has consistently lied about the impact the rezoning would have and who would be hurt by it. It's the lower-income tenant-renters, artists, seniors, and Chinatown residents who will be most hurt. Neighbors support an alternative plan for real affordable housing without displacement, oversized development, and big-box chain stores. Vote no.

Regards,
Richard Ayotte
1133 Broadway
New York, NY 10010

From: [Ritu Chattree](#)
To: [Land Use Testimony](#)
Subject: [EXTERNAL] Vote No on the SoHo/NoHo/Chinatown Upzoning Plan
Date: Thursday, November 11, 2021 2:02:34 PM

To the City Council:

I strongly urge the City Council to vote no on the disastrous SoHo/NoHo/Chinatown upzoning plan. This proposal would fulfill none of its affordable-housing promises, as it actually makes it more profitable to build without affordable housing than with. It will create huge incentives for destroying the hundreds of existing units of rent-regulated and loft-law affordable housing in the neighborhood, disproportionately occupied by lower-income, senior, artist, and Asian American residents, many of whom would be displaced. It will push out arts and any other small businesses with its allowance for giant big-box retail of unlimited size. It will encourage grossly oversized development up to 2.5 times the size current rules allow, and more than 2.5 times the size of average buildings here now. It will encourage the destruction of historic buildings, and allow developers to add luxury condos and apartments with no affordable housing so long as they don't exceed 25,000 sq ft per zoning lot. Even in this relatively wealthy neighborhood, new development even with the 25–30% “affordable” housing will still overall make the neighborhood richer, less diverse, and more expensive, as the new market-rate units would be so expensive and the “affordable” ones unaffordable to even a significant share of residents here.

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Regards,
Ritu Chattree
61 Jane St
New York, NY 10014

From: [Roger Manning](#)
To: [Land Use Testimony](#)
Subject: [EXTERNAL] Vote NO on SoHo, NoHo + Chinatown rezoning proposal
Date: Wednesday, November 10, 2021 11:43:44 AM

New York City Council,

I urge you to vote NO on the SoHo, NoHo + Chinatown rezoning proposal.
(Zoning Map Amendments C210422ZMM and N210423ZRM)

I support the December 2020 "Community Alternative Zoning Plan for SoHo/NoHo": <https://media.villagepreservation.org/wp-content/uploads/2021/04/14223752/SoHo-NoHo-revised-Community-Alternative-Zoning-Plan.pdf>

I urge you to deny the City's rushed and ill-advised plan to re-zone SoHo, NoHo, and Chinatown. The plan puts at risk hundreds of rent regulated tenants within the re-zoning area, many of us seniors aging in place, all made more vulnerable by the city's new allowances for overwhelming construction and demolition made possible by the granting of new FAR to property owners. It also ignores the irreplaceable architectural character and feel of the district.

SoHo and NoHo must evolve in a creative and sustainable way. We need affordable housing and a path forward for continuation of JLWQA. With vision and thoughtfulness, both can be achieved without a massive developer-driven upzoning that promises neither.

Roger Manning
Broome Street resident since 1983

From: [Ronnie Wolf](#)
To: [Land Use Testimony](#)
Subject: [EXTERNAL] OPPOSITION TO DCP SOHO/NOHO Plan
Date: Thursday, November 11, 2021 11:11:18 AM

Good day Chair Moya and Speaker Johnson,
As you continue to negotiate with Councilwoman Chin and DCP, I encourage you to ask yourself if DCP's Plan is an ambitious approach to tackling climate change or is the Plan a failure in addressing a Worldwide concern?

Repurposing Commercial buildings and creating housing best addresses the need for an umbrella of affordable housing.

DCP's Plan points to potential and actual sites to be demolished or built upward. A majority are landmarked, house rent regulated tenants or both.

The increase in FAR for both Commercial and Residential diminishes light and air and increases the burden on the insufficient and antiquated infrastructure located here. This in turn stresses small businesses and residents alike.

SoHo/NoHo should continue to contribute to combating the climate impact by the City by continuing to be a low density area.

Residents have been extremely active in rallying for more affordable housing. We have met with politicians and written letters..been on calls.. where we championed for affordable housing to be built at 2 Howard St and 5 World Trade Center.

It's misguided and not true that residents are trying to keep anyone out of these neighborhoods. We are in opposition of this Plan because if enacted, it will be at the expense of displacement of our vulnerable neighbors and destruction of low density buildings..they too serve a purpose to the thousands of visitors, office workers and residents..they provide for greater airflow and sunlight.

Lastly, DCP's proposal of an Art Fund is punitive. That any resident should pay any amount of money is insane and in many cases impossible. If any entity is slapped with a directive to pay into the Art Fund, it should be the commercial owners..who are being given a free ride..with AS OF RIGHT. The focus on who should pay into the Fund is wrong, and was intentionally directed at those who have been so vocal against the Plan.

The Plan is flawed, has loopholes, absolutely no mechanism to convert these manufacturing buildings to residential as they CAN NOT meet the code. It's the JLWQA units that need to be protected and even more should be built. The non conforming residents, many many are artists who have lived here for decades were never certified..dancers, architects,designers..they didn't meet the certification criteria.

And now Councilwoman SURPRISED proposed Bill. Did Councilwoman Rivera know about it? Was she part of the planning session? The final outcome of this ill conceived proposal

would be to destabilize the present housing market and has already inflicted tremendous mental anguish on our residents. WHAT WAS SHE THINKING?

This entire process has been torturous. I've been on every call, in many rooms and had to listen to irrational comments from those who are not the boots on the ground.

My family and I have lived here 42 years and we can share with you every detail about how our neighborhood functions. Where it floods, when to expect traffic and for how long and even the names of Con Ed and DEP workers who come back multiple times a year to repair steam pipes and infrastructure that is damaged because of the steam. Verizon has informed me I will NEVER have a landline again because of some sort of underground problem impossible to solve! That's NOT OK!

We know these workers..they practically live here.

Please stop negotiating and turn down the Plan. Ask to make things right and use the years of factual input residents sited on the chats and in testimony.

The time is now to commence to create a new Envisionary Plan. Or use the Community Alternative or Cooper Sq Plans as your template.

Thank you for your time.

Ronnie Wolf

Residential Representative on SBI and BRC Member

From: [Rosalind Solomon](#)
To: [Land Use Testimony](#)
Subject: [EXTERNAL] Vote No on the SoHo/NoHo/Chinatown Upzoning Plan
Date: Wednesday, November 3, 2021 12:45:53 AM

To the City Council:

I strongly urge the City Council to vote no on the disastrous SoHo/NoHo/Chinatown upzoning plan. This proposal would fulfill none of its affordable-housing promises, as it actually makes it more profitable to build without affordable housing than with. It will create huge incentives for destroying the hundreds of existing units of rent-regulated and loft-law affordable housing in the neighborhood, disproportionately occupied by lower-income, senior, artist, and Asian American residents, many of whom would be displaced. It will push out arts and any other small businesses with its allowance for giant big-box retail of unlimited size. It will encourage grossly oversized development up to 2.5 times the size current rules allow, and more than 2.5 times the size of average buildings here now. It will encourage the destruction of historic buildings, and allow developers to add luxury condos and apartments with no affordable housing so long as they don't exceed 25,000 sq ft per zoning lot. Even in this relatively wealthy neighborhood, new development even with the 25–30% “affordable” housing will still overall make the neighborhood richer, less diverse, and more expensive, as the new market-rate units would be so expensive and the “affordable” ones unaffordable to even a significant share of residents here.

The City has consistently lied about the impact the rezoning would have and who would be hurt by it. It's the lower-income tenant-renters, artists, seniors, and Chinatown residents who will be most hurt. Neighbors support an alternative plan for real affordable housing without displacement, oversized development, and big-box chain stores. Vote no.

Regards,
Rosalind Solomon
712 Broadway
New York, NY 10003

From: [sante scardillo](#)
To: [Land Use Testimony](#)
Subject: [EXTERNAL] Amended - NO to Soho/Noho Rezoning "plan" -Testimony for City Council November 9 Committee hearing
Date: Thursday, November 11, 2021 8:19:41 AM

I updated my testimony during the presentation by NYCDPD. On the emblematic statement by one of the presenting bureaucrats: present zoning reserves ground floor use for industrial activities, imposing unbearable burden on development. Industrial? Such as flagship stores by Chanel, Valentino, Burberry, side by side on Spring Street, and Luis Vuitton further up the block?

Obviously there are ways to get around existing zoning, and turn the formerly destined for the wrecking ball small manufacturing artist ghetto into a bling mine: this is precisely why the present zoning should be left as is. But the presenting bureaucrats seem more concerned with flowcharts than walking the neighborhoods they are so hellbent on "de-structuring".

Residents have accepted the compromise of living in an open air mall, but the greed of the forces that have turned what artists and community organizations saved from Robert Moses' wrecking ball into a commercial carnival, will literally dig out the ground we and they stand on, in pursuit of a bigger profit. They are pushing this evil plan, aided and abetted by the City administration they so skillfully worked and paid for to front for it.

The land grab proceeds unabashed in the waning months of the DeBlasio regime, in cahoots with our corrupt representatives in the City Council (we can't wait for you leave office): the East River Park Destruction, the Governor's Island and Gowanus Canal "rezoning"; the seizing of every square and cubic inch over any lot to make a profit for real estate holders and connected construction companies, while robbing the people of New York City of air, light and what the city economy thrives on: neighborhoods diversity, which turns each New Yorker into a spending scholar-tourist, while learning about our diverse cultural history.

Don't kill the goose that lays the golden eggs: if this wretched plan is allowed to proceed, in a few years Soho and Noho won't look or feel any different from Midtown Manhattan. Is this what we want our city to become? The City Council has a responsibility, to the people of our great city and to History. Don't kill the arts, culture, and the human resources of long timers like me (40 years in the neighborhood) which makes us, collectively as a city, what we are; and don't buy in the astro-turfing pretenses of encouraging diversity: they are just that, no matter how fancy the sheep clothing. For a long time, green has been the only color that allows newcomers to the area, and this plan will cement the trend. I entreat you to Vote NO and

consign this aberration to the dustbin of history.

Sante Scardillo

For LINA, Little Italy Neighborhood Association

From: [Sara Brandston](#)
To: [Land Use Testimony](#)
Subject: [EXTERNAL] Vote No on the SoHo/NoHo/Chinatown Upzoning Plan
Date: Thursday, November 11, 2021 7:24:46 AM

To the City Council:

I strongly urge the City Council to vote no on the disastrous SoHo/NoHo/Chinatown upzoning plan. This proposal would fulfill none of its affordable-housing promises, as it actually makes it more profitable to build without affordable housing than with. It will create huge incentives for destroying the hundreds of existing units of rent-regulated and loft-law affordable housing in the neighborhood, disproportionately occupied by lower-income, senior, artist, and Asian American residents, many of whom would be displaced. It will push out arts and any other small businesses with its allowance for giant big-box retail of unlimited size. It will encourage grossly oversized development up to 2.5 times the size current rules allow, and more than 2.5 times the size of average buildings here now. It will encourage the destruction of historic buildings, and allow developers to add luxury condos and apartments with no affordable housing so long as they don't exceed 25,000 sq ft per zoning lot. Even in this relatively wealthy neighborhood, new development even with the 25–30% “affordable” housing will still overall make the neighborhood richer, less diverse, and more expensive, as the new market-rate units would be so expensive and the “affordable” ones unaffordable to even a significant share of residents here.

The City has consistently lied about the impact the rezoning would have and who would be hurt by it. It's the lower-income tenant-renters, artists, seniors, and Chinatown residents who will be most hurt. Neighbors support an alternative plan for real affordable housing without displacement, oversized development, and big-box chain stores. Vote no.

Regards,
Sara Brandston
321 W 12th St
New York, NY 10014

From: [Sarah Gallagher](#)
To: [Land Use Testimony](#)
Subject: [EXTERNAL] Vote No on the SoHo/NoHo/Chinatown Upzoning Plan
Date: Wednesday, November 3, 2021 4:32:58 AM

To the City Council:

I strongly urge the City Council to vote no on the disastrous SoHo/NoHo/Chinatown upzoning plan. This proposal would fulfill none of its affordable-housing promises, as it actually makes it more profitable to build without affordable housing than with. It will create huge incentives for destroying the hundreds of existing units of rent-regulated and loft-law affordable housing in the neighborhood, disproportionately occupied by lower-income, senior, artist, and Asian American residents, many of whom would be displaced. It will push out arts and any other small businesses with its allowance for giant big-box retail of unlimited size. It will encourage grossly oversized development up to 2.5 times the size current rules allow, and more than 2.5 times the size of average buildings here now. It will encourage the destruction of historic buildings, and allow developers to add luxury condos and apartments with no affordable housing so long as they don't exceed 25,000 sq ft per zoning lot. Even in this relatively wealthy neighborhood, new development even with the 25–30% “affordable” housing will still overall make the neighborhood richer, less diverse, and more expensive, as the new market-rate units would be so expensive and the “affordable” ones unaffordable to even a significant share of residents here.

The City has consistently lied about the impact the rezoning would have and who would be hurt by it. It's the lower-income tenant-renters, artists, seniors, and Chinatown residents who will be most hurt. Neighbors support an alternative plan for real affordable housing without displacement, oversized development, and big-box chain stores. Vote no.

Regards,
Sarah Gallagher
1136 1st Ave
New York, NY 10065

From: [Shaurav Datta](#)
To: [Land Use Testimony](#)
Subject: [EXTERNAL] Testimony in support of the SoHo/NoHo Neighborhood Plan
Date: Wednesday, November 10, 2021 9:00:53 AM

Dear Council Member Chin, Council Member Levin, Committee Chair Moya and other City Councilmembers,

I'm writing as a constituent from City Council District 33 (my place of residence and City Council District 1 (my place of employment) in support of the SoHo/NoHo Neighborhood Plan.

I'm submitting written testimony on my own behalf as I was unfortunately able to participate live in the hearing on this matter on November 10, 2021.

I've worked in Council District 1 for the past decade, and am a former resident of Lower Manhattan, who made the move to Brooklyn in search of lower rents. I'm a public servant myself and was fortunate to be able to find rent-stabilized/mixed-income rental housing, where I have lived throughout this time.

The rent-stabilized/mixed-income housing development I call home today was a product of the Downtown Brooklyn rezoning, and created modern and energy-efficient housing opportunities in a transit-rich neighborhood for me and 15,000 other New Yorkers from all walks of life. Like the SoHo/NoHo Neighborhood Plan, the Downtown Brooklyn rezoning had to overcome loud and sustained opposition led primarily by wealthy incumbent homeowners more concerned about the property values of their Brooklyn brownstones and less about supporting housing security for their fellow New Yorkers. While there is undoubtedly value in historic preservation, arguments in favour of maintaining the SoHo/NoHo "neighborhood context" are nothing but a thinly-disguised, nativist attempt at exclusion.

I am disappointed that a vocal, but very homogeneous group of local community representatives, predominantly wealthy homeowners and rent-restricted tenants, see no issues with effectively fostering a two-class system in SoHo/NoHo: those already fortunate to be homeowners or live in rent-restricted housing, and everyone else that has to fight it out for the very limited and absurdly high-priced housing options that remain there.

The City Council has a historic opportunity to make a statement here that it will not only

look to shunt housing growth out into less rich outerborough neighborhoods that may then face gentrification pressures. Wealthy, and largely homogeneous neighborhoods like SoHo/NoHo should be expected to do their fair part in collectively responding to New York City's housing scarcity.

I ask the City Council to please keep a big-picture perspective and put the entire City's long-term homebuilding and growth needs into perspective over the narrow aesthetic and contextual concerns that have been raised to dispute the benefits that the SoHo/NoHo Neighborhood Plan will bring. Please give consideration to limiting commercial density in this Plan, and make every effort to support maximizing residential density so that the return the City gets from this Plan can make a tangible impact on the availability of affordable housing in this part of Lower Manhattan.

I have sadly had to witness so many friends and peers that have had to leave the New York area due to housing costs associated with a growing family, particularly in the most opportunity- and transit-rich part of New York City. Meanwhile, rents throughout the City, particularly in Lower Manhattan have continued to rise unabated.

Let's look to change that, on behalf of all New Yorkers. I encourage you to approve the SoHo/NoHo Neighborhood Plan.

Thank you for your consideration and the work you do to serve New Yorkers.

Shaurav Datta

From: [Shirley Kaneda](#)
To: [Land Use Testimony](#)
Subject: [EXTERNAL] Soho/Noho Neighborhood Zoning Change
Date: Wednesday, November 3, 2021 12:21:17 PM

Dear Council Speaker Johnson,

I am a 30 plus years resident of Soho and vigorously oppose the zoning change that is proposed for Soho/Noho. I am an artist and while there are fewer of us living and working here, we are the ones who made this neighborhood into the vibrant place it is today. And yet we will be punished by this zoning change. Not only is this change misleading that it will produce more low income housing, in reality it would squeeze out the artist residents already living here protected under the loft law.

There is plenty of commerce going on in this area already that there is absolutely no need to expand the commercial foot print. In the 30 plus years I have been living here, I have watched all the businesses that used to service many other businesses such as floor sanding business, iron works that used to make iron window and doors, hard ware stores, etc. all vanish and are now ONLY high end boutiques, furniture and bedding stores. We are inundated with shoppers and tourists every day and night with loud revelers who party and dine here. Adding more commercial space doesn't make sense. It will become another Times Square, a mega shopping district that will make living here all the more unbearable with noise pollution, cars honking day and night which already is.

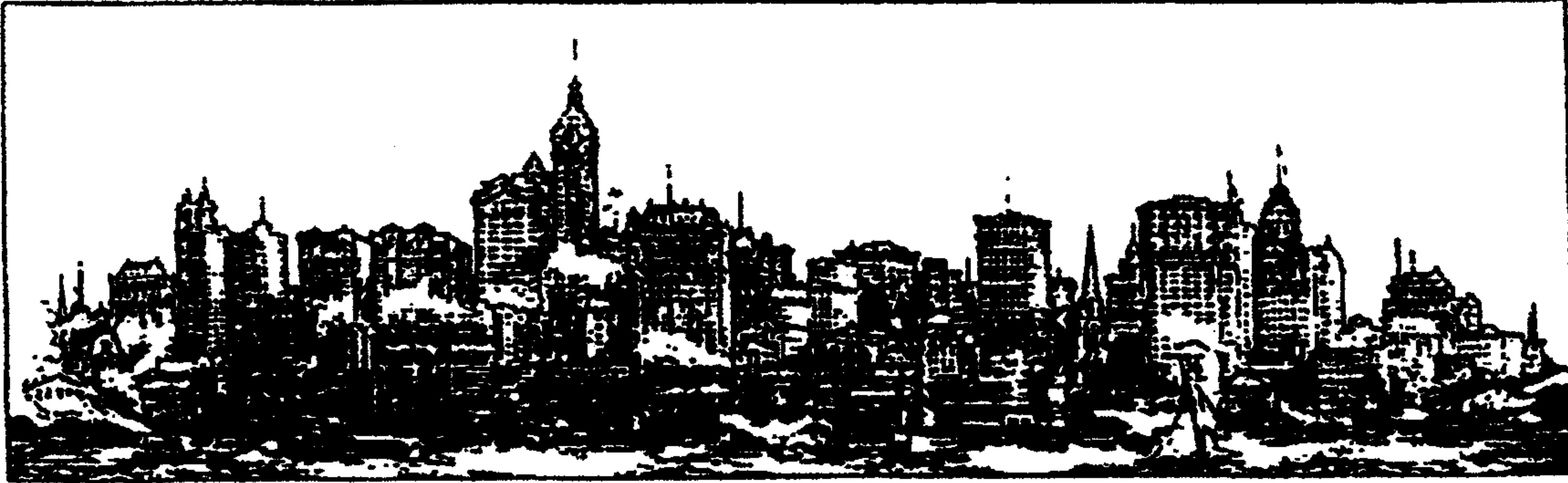
And if I decide to sell my place, I have to pay the city \$1000 per sq ft so it can be converted from artist in residence to a regular c of o??? What kind of logic is this? Why am I being penalized for having a space in an area that was designated as artist in residence 50 years ago??? Now the city wants to change the designation just like that and make us pay for the one asset that we artists have? Artists make a meager living for the most part despite our lofts being valuable and if I decide to sell, it is the only asset that will help me in my old age. I am 70 years old and will need all the financial help I can get as I get older. I find this regulation unfair and highly discriminatory. If the city wants to change the c of o designation, it can do so without this ridiculous condition attached to it.

Above all, I would like to continue to live and work in relative peace in the neighborhood that I have called home for so many decades.

Please do not let this zoning change go through!

Thank you.

Shirley Kaneda
96 Grand St., 
New York, NY 10013



THE SOCIETY FOR THE ARCHITECTURE OF THE CITY

SoHo/NoHo Neighborhood Plan, LU 2021-8155 LU 2020-8156

Subcommittee on Zoning and Franchises, Hearing November 9, 2021

Some New Yorkers have a visceral dislike of history and the past, and they will unite behind an up-zoning that creates financial incentives for destruction of old, landmarked architecture, and calls for transformation of places that remind us of our history. Optimists imagine that the SoHo-NoHo rezoning—which targets a staggering number of local, state and federal historic districts and individual landmarks—will not be a problem, because the landmarks are fully protected. This is not true.

State and federal designations are honorific; they provide tax benefits; they do not prevent demolition or alteration. Our local NYC landmarks law worked quite well for fifty years, when government leaders still saw value in the checks and balances provided by the agency's regulatory policies. But our local landmarks law was born of compromise: it does not necessarily prevent the Landmarks Chair, a political appointee, from steering the Commission to discretionary decisions that are in fact destructive of the landmarks law's original objectives.

As a longtime monitor, it is my observation that the agency is slipping away from its original mission, instead, leaning toward facilitating real estate development, without "adequate consideration"—in the words of the law, "of the irreplaceable loss to the people of the city of the aesthetic, cultural and historic values represented" by landmarks. Now, with this re-zoning, landmarks and historic districts that people believed would be protected treasures of the city forever are in danger.

But not only designated individual landmarks and historic districts could disappear. We may lose evidence of demographic patterns that have long made New York both an interesting home city and an international tourist attraction. For instance "Chinatown:" an intriguing urban enclave and major tourist destination would eventually be obliterated by luxury high rise development devoid of history and character. New buildings targeted at high income newcomers and part-time residents eager to enjoy panoramic views, far above newly monetized streets that could be anywhere, can mean eviction of New Yorkers from their homes. Similarly jeopardized are the traces of Little Italy, the generations old cheese stores, coffee shops and restaurants founded by immigrants and still a destination for food lovers and sentimental journeys to the old country of memory. Small businesses owned by human beings not corporations will generally be wiped out by assemblages to create the broad bases of glittering new investment towers.

The proposed zoning is potentially destructive of the real character of New York and should not be approved by the City Council in its present form.

45 Tudor City Place, 1815, New York, New York 10017 (646)509-4944

Ronald J. Kopnicki, President Matt McGhee, Treasurer Christabel Gough, Secretary
christabelgough@gmail.com

From: Sean
To: Land Use Testimony
Subject: [EXTERNAL] REJECT de Blasio & RENBY's UPZONING of SoHo/NoHo/Chinatown
Date: Thursday, November 11, 2021 10:15:41 PM

SoHo Alliance
125 Greene Street
New York, NY 10012
sohoalliance.org
212-353-8466
info@sohoalliance.org

Dear Councilmember:

Founded in 1981, the SoHo Alliance is the direct successor to the SoHo Artists Association, the community group that worked with City Planning in 1971 to create SoHo's current successful zoning, turning an urban wilderness into a world-famous neighborhood that is a boon to this city.

However, de Blasio's current City Planning is not the same agency.

Instead of working with the community to modify and tweak the current zoning, today's City Planning has created an upzoning scheme that ignored community input and presents a plan that will benefit RENBY and real-estate speculators only.

And the promise of "affordable housing" is illusory, another of de Blasio's film-flams. You can drive a Mack truck through the many loopholes developers can use to avoid creating affordable housing.

Please reject this ill-conceived scheme.

- It imposes a punitive flip tax on residents to convert from current "artist living-quarters" zoning to straight residential use, but imposes no tax on commercial owners converting from manufacturing to retail use
- Where this tax money goes has never been defined
- It legalizes destination big-box retail, putting displacement pressure on small, creative businesses and local retail stores
- It allows the influx of huge restaurants, bars and nightclubs, including entertainment space outdoors and on roofs
- It encourages new construction of office towers 2-1/2 times the size of the average SoHo/NoHo building
- It is the first upzoning of an historic district since the Landmarks Preservation Commission was created in 1965
- It will encourage demolition of historic buildings
- Loopholes fail to guarantee that a single unit of affordable housing will ever be built, while encouraging luxury residential construction
- Resulting gentrification will put tremendous displacement pressure on low-

income, rent-stabilized, Asian-American tenants in Chinatown, as well as loft tenants in SoHo/NoHo

- It is a lame-duck giveaway to de Blasio's real-estate donors, like Edison Parking, which owns the two largest development sites in the proposal
- It will legalize the expansion of NYU into SoHo, something NYU agreed never to do
- The community has prepared a plan that will allow for affordable housing but not by permitting high-rise towers

Sean Sweeney

Sean

From: [STACY KAUFMAN](#)
To: [Land Use Testimony](#)
Subject: [EXTERNAL] Please vote against Soho upcoming
Date: Wednesday, November 3, 2021 2:33:39 PM

To the City Council,

Please listen to your constituents - and not the developers' lobbyists.

I know that this request may be a conflict of interests for you - but please take the moral and ethical action in this critical case and vote against the Soho upzoning.

Do not irrevocably destroy our neighborhood. Do not let that be your legacy.

(And please try to save the precious Elizabeth St Garden. Please go there and see for yourself how magical it is, why it's listed in many tour books).

Thank you,
Stacy Kaufman
234 Thompson St

From: [Stefan Ziegler](#)
To: [Land Use Testimony](#)
Subject: [EXTERNAL] Soho Rezoning
Date: Wednesday, November 3, 2021 5:04:22 PM

To whom it may concern:

I am a Swiss resident but also the owner of and part-time resident in a loft in 37 Greene Street. The prime reason that I chose this neighbourhood was the special character of Soho. As a landmarked district, it has a most unique character, appeal and charm.

This cast iron district with its lofts has no matches worldwide. This district is super special with its architecture, culture and history and as such deserves the highest protection and land marking. Soho's uniqueness draws visitors from all over the world and its sheer existence contributes so much to the beauty and appeal of New York.

To change now the landmark rules for the sake of profit and under the pretext of affordable housing is short-sighted and wrong. This will do a lot of harm with no long-term benefits at all.

I strongly urge you to not lift the landmark protection as it currently stands and to stand up for Soho and for New York with all its beauty and uniqueness.

Kind regards, Stefan Ziegler, Küsnacht (Switzerland) and New York (Soho)

From: [Stephen Korol](#)
To: [Land Use Testimony](#)
Subject: [EXTERNAL] Vote No on the SoHo/NoHo/Chinatown Upzoning Plan
Date: Wednesday, November 10, 2021 11:00:31 PM

To the City Council:

I strongly urge the City Council to vote no on the disastrous SoHo/NoHo/Chinatown upzoning plan. This proposal would fulfill none of its affordable-housing promises, as it actually makes it more profitable to build without affordable housing than with. It will create huge incentives for destroying the hundreds of existing units of rent-regulated and loft-law affordable housing in the neighborhood, disproportionately occupied by lower-income, senior, artist, and Asian American residents, many of whom would be displaced. It will push out arts and any other small businesses with its allowance for giant big-box retail of unlimited size. It will encourage grossly oversized development up to 2.5 times the size current rules allow, and more than 2.5 times the size of average buildings here now. It will encourage the destruction of historic buildings, and allow developers to add luxury condos and apartments with no affordable housing so long as they don't exceed 25,000 sq ft per zoning lot. Even in this relatively wealthy neighborhood, new development even with the 25–30% “affordable” housing will still overall make the neighborhood richer, less diverse, and more expensive, as the new market-rate units would be so expensive and the “affordable” ones unaffordable to even a significant share of residents here.

The City has consistently lied about the impact the rezoning would have and who would be hurt by it. It's the lower-income tenant-renters, artists, seniors, and Chinatown residents who will be most hurt. Neighbors support an alternative plan for real affordable housing without displacement, oversized development, and big-box chain stores. Vote no.

Regards,
Stephen Korol
828 6 Ave N
Saskatoon, SK S7K 2T2

From: [Susan Breindel](#)
To: [Land Use Testimony](#)
Cc: [Chin](#); [District2](#); [Drummond, Anthony](#); [Fung, Cora](#); [Cehonski, Irak](#); [Speaker Corey Johnson](#); [Bottcher, Erik](#); [Comerford, Patrice](#); [Office of Council Member Powers](#); [Levine, Mark](#); [Lander, Brad](#); [AskJB](#); [Salamanca, Rafael](#); [Moya, Francisco](#); [glickd@assembly.state.ny.us](#); [Helen@helenrosenthal.com](#); [District7](#); [Ayala, Diana](#); [D09Perkins](#); [Rodriguez, Ydanis](#); [Dinowitz](#); [Gonaj, Mark](#); [Cabrera, Fernando](#); [District16Bronx](#); [Diaz, Ruben](#); [District19](#); [Koo, Peter](#); [Costa Constantinides](#); [Grodenchik, Barry S.](#); [Dromm, CM](#); [Van Bramer, Jimmy](#); [Adams](#); [Koslowitz, CM](#); [District30](#); [Ulrich, Eric](#); [Levin, Stephen](#); [Reynoso, Antonio](#); [Cumbo, Laurie](#); [Corney, Robert](#); [District37](#); [info38](#); [Council Member Lander](#); [Eugene, Mathieu](#); [District41](#); [Barron, Inez](#); [AskKalman](#); [District45](#); [Maisel, Alan](#); [Treyger, Mark](#); [Deutsch, Chaim](#); [Matteo, Steven](#); [Joseph Borelli](#); [joddo@statenislandusa.com](#); [BKallos@benkallos.com](#)
Subject: [EXTERNAL] Rezoning SOHO-NOHO
Date: Thursday, November 11, 2021 10:41:58 AM

I am a 23 year resident /loft owner of 27 Great Jones Street condominium. I have lived, had office space, and raised a family in SOHO NOHO for the past 44 years , starting on Crosby Street . Although the plan has plenty of flaws that countless neighbors spoke to and substantiated very eloquently on the last public zoom hearing, I would like to focus on the JLWQA issue regarding AIR buildings specifically , which has not been properly addressed in this plan. I have attended all “Envision” exploratory meetings , and all follow up public hearings on zoom. I have spoken to numerous city officials, including Gale Brewer and Council member Chin. I also wrote to the Borough president , as she suggested , almost 2 years ago laying out the specifics of our buildings situation. Every time we were assured that a suitable solution would be found. The 1978 rezoning created a wonderful artistic neighborhood that has a global reputation. But it had plenty of flaws that overtime became apparent for our present day needs. To correct this was an integral portion of the rezoning plan.

This half baked plan , as so many of we residents of Soho Noho brought to the table, as well as most of our elected officials on the panel , pointed out to be the case, leaves us with numerous questions such as some of these below :

Do the non conforming units stay JLWQ or become UG 2? There are plenty of problems arising here.

Will the AIR certification process be more streamlined and inclusive of diverse creative professions?

Will the units that are presently not compliant get proper CofOs?

The last minute law that Council Member Chin introduced shows contempt and insincerity of the process. I urge you to retract this law and find a proper solution that will take this historic neighborhood into the far future. A comprehensive zoning that includes affordable housing but also respects the people that are living here for a long time and contributed to its success .

Attached please read my letter to Borough President Gale Brewer , which I sent almost 2 years ago and I hope you read as well.

Sincerely,

Susan Breindel

susanbreindel@mac.com

Subject: letter

Date: January 12, 2020 at 9:47:10 PM EST

To: Susan Breindel <susanbreindel@me.com>

To the Honorable Gale Brewer, manhattan borough president

I sincerely appreciated the time you allowed me, after Wednesday's zoning meeting, to address our buildings particular situation. As you had suggested, I will lay out the circumstances of our building in Noho.

The building: Condominium at 27 Great Jones Street with 10 residential and 1 commercial unit (The Great Jones Spa).

Owners in relation to AIR: Half of the owners are working in creative fields.. We have 1 celebrated fine art photographer, 1 fine art gallerist, 1 fashion stylist, 1 food Stylist , 1 writer/publisher, 1 documentary film director, 1 broadway theater director , 2 in fashion representation.

Owner with AIR Certificate: 1

History:

27-29 Great Jones Street was converted from a warehouse/manufacturing to a condominium building from 1996-1998. When the first owners moved in, the building was operating under a (every three months expiring) TCO. Although there are more reasons why we failed the final CofO inspections, the AIR has always been paramount and gave us little hope, it will ever be obtained within the guidelines of the existing zoning.

Fast forward 20 years, the owners are really in a quandary. We have three unit owners that are divorced and one moved to Paris. They all need to sell and move on. Since 2008, banks are reticent to provide mortgages to potential buyers for apartments in a building without a CofO. Hence , the owners are forced to find rental tenants. This drastically changes the make up of our small building. Consequently this has greatly brought down the market value of the units.

Developers, buyers, sellers, citizens clearly take advantage of the non-enforcement of the city laws to stretch the limits. This has always been the case. Hence the 1971 zoning change. And again NOHO/SOHO sees itself in a situation where the social and economic forces have been able to challenge the existing zoning.

My personal preference would be, to do away with this antiquated JLWQ requirement and find an alternative to accommodate/protect the artistic/creative nature of our neighborhood. In absence of such a compromise , a proposal as in the Summary of Findings and Recommendations of the zoning report was put forward is a good step to a resolution. I would urge however to well define what is allowed under a JLWQ. in particular what type of work, how many employees, noise levels, operating hours etc.

In closing I would like to say that for the last 43 years, I've worked and lived in Soho/Noho. I can comfortably say that this is "my neighborhood".

Thank you very much for your time and consideration.

Respectfully,

Susan Breindel
27 Great Jones Street, apt 2E
917 439 8683

CC: Tara Duvivier, AICP

From: [Susan Chumsky](#)
To: [Land Use Testimony](#)
Subject: [EXTERNAL] Soho, Noho, Chinatown upzoning
Date: Thursday, November 11, 2021 5:45:27 PM

Dear City Council:

I don't live in Soho, Noho, or Chinatown, but they live in me. They're singular, historic, gorgeous neighborhoods, and everything that's special about them is now threatened by the mayor's horrendous upzoning proposal. Worse, this destruction will not bring the promised affordable housing. When have new luxury towers in Manhattan EVER brought affordable housing?!

While developer-aligned astroturf groups like Open New York and REBNY call people like me NIMBYs and contend, as the mayor does, that their plan will deliver affordable housing, both of these claims are false. In fact the plan incentivizes the opposite: commercial over residential construction, demolition over preservation of rent-stabilized units. The upzoning plan does not require or guarantee a single unit of affordable housing. (And for the record, I'm not crying NIMBY—these neighborhoods are not in my backyard.)

Like many others around the world, I love and treasure the unique character of Soho, Noho, and Chinatown. I want to preserve that character while finding real ways to **address the urgent housing crisis, rather than addressing the interests of the donors who will fund the mayor's pathetic run for governor.**

The Landmarks Preservation Commission designated most of the area in question for protection for a reason. Overriding this landmarks designation through loopholes and subterfuge is shameful and corrupt. Doing so for pretend affordable housing is unconscionable.

Susan Chumsky
Manhattan

From: [Susan Fortgang](#)
To: [Land Use Testimony](#)
Subject: [EXTERNAL] Vote No on the SoHo/NoHo/Chinatown Upzoning Plan
Date: Wednesday, November 10, 2021 1:18:22 PM

To the City Council:

I strongly urge the City Council to vote no on the disastrous SoHo/NoHo/Chinatown upzoning plan. This proposal would fulfill none of its affordable-housing promises, as it actually makes it more profitable to build without affordable housing than with. It will create huge incentives for destroying the hundreds of existing units of rent-regulated and loft-law affordable housing in the neighborhood, disproportionately occupied by lower-income, senior, artist, and Asian American residents, many of whom would be displaced. It will push out arts and any other small businesses with its allowance for giant big-box retail of unlimited size. It will encourage grossly oversized development up to 2.5 times the size current rules allow, and more than 2.5 times the size of average buildings here now. It will encourage the destruction of historic buildings, and allow developers to add luxury condos and apartments with no affordable housing so long as they don't exceed 25,000 sq ft per zoning lot. Even in this relatively wealthy neighborhood, new development even with the 25–30% “affordable” housing will still overall make the neighborhood richer, less diverse, and more expensive, as the new market-rate units would be so expensive and the “affordable” ones unaffordable to even a significant share of residents here.

The City has consistently lied about the impact the rezoning would have and who would be hurt by it. It's the lower-income tenant-renters, artists, seniors, and Chinatown residents who will be most hurt. Neighbors support an alternative plan for real affordable housing without displacement, oversized development, and big-box chain stores. Vote no.

Regards,
Susan Fortgang
23 Greene St
New York, NY 10013

November 11, 2021

RE: AGAINST the Proposed SoHo/NoHo Upzoning

Dear City Council Members:

I am strongly AGAINST the city's proposed SoHo/NoHo Upzoning plan. Please vote AGAINST this proposal.

The City Council has the final say in the public review process on zoning changes. The City's proposed plan would allow extensive new development in SoHo, NoHo and parts of Chinatown. **Allowing grossly out-of-scale development in these Historic Districts threatens existing affordable housing**, and creates a blueprint for rezoning historic neighborhoods citywide. How dare you even consider changing zoning laws that protect our historic districts and allow local community boards to exercise case-by-case control over proposed uses of its neighborhoods? This is a gross betrayal of important checks and balances that New Yorkers depend upon to preserve a decent quality of life and small local businesses.

The City's plan mandates only 25% affordable housing at best, allowing 75% luxury housing. The proposed plan has numerous loopholes, with no public benefit of any kind required for the development of commercial space or private institutional facilities. It would permit institutional expansion, and crowd out local independent businesses by allowing more big-box chain stores, and eating and drinking establishments of unlimited size.

The glut of empty office buildings in Manhattan will surely increase and should be converted to housing in Midtown and down around Wall Street. Many companies are downsizing their use of office space and moving to a full or hybrid remote model to save money and retain employees who prefer working from home without the commute and with more flexibility for childcare. This trend is already becoming permanent in the large financial, law, and tech industries in the city. It will only accelerate. Don't let developers build new buildings; instead insist that they convert existing buildings in Midtown and the Wall Street area.

Preserve affordable housing! Preserve small local businesses. Preserve the quality of life in SoHo, NoHo, and Chinatown. I have lived and worked in Manhattan for over 40 years and I would like to stay here in retirement if the city can preserve some of the historic charm of its treasured sections of the city. Please do not view this proposal as a way to find more tax income from real estate developers. Real estate development cannot continue to be the main solution to the city's tax burdens. Don't ruin the historic character of the city that brings tourists and new residents to our wonderful city. **Please speak out and vote AGAINST this zoning change proposal.** Thank you.

Very truly yours,

Susan Lashley
321 E. 10th St. Apt. █
New York, NY 10009

From: [Susan Stoltz](#)
To: [Land Use Testimony](#)
Subject: [EXTERNAL] Follow-up written testimony - Opposed to the SoHo-NoHo and Chinatown Up-zoning
Date: Thursday, November 11, 2021 9:44:23 PM

I am a 42-year SoHo resident, artist loft tenant, and senior. I worked across NYC as an artist in hospitals, schools, and diverse communities.

After listening to Mayor de Blasio's SoHo/NoHo Up-zoning proposal at the NY City Council committee hearing yesterday-our final chance to see the plan. Minor ambiguous and deceptive changes appeared. Is this all they've got? After two years of meetings, in the fall of 2020, when up-zoning became the DCP's new objective, the SoHo/NoHo/Chinatown community was effectively shut out. NYC rezoned a district for artists in 1969. We still live and work in our studios. Yet, without community input, the DCP has set up mechanisms such as an ART Tax, ambiguity over live-work space, and deception concerning "protections" from the displacement of residents: artists, seniors, and low-income residents. Displacement was the biggest concern by our representatives--past, present, and newly elected. All I could take away was wincing at the freshly added confusion. If this plan moved forward, it would plunge our district into CHAOS. Pain and hurt for residents, seniors, loft, rent-stabilized tenants, and the continued erasure of artists and our creative community. The president of a disastrous new model for the real estate industry:

- Decreases diversity by focusing on luxury housing and office towers
- Displaces existing low income and affordable housing tenants through demolition and interior construction.,
- Destroys landmarked buildings;
- Establishes a license to demolish historic districts.

The unique character of the world-renown cast-iron architecture of SoHo's historic district preserved and regulated by residents, building owners, and the community since Jane Jacobs and others saved the area from Robert Moses' bulldozer in the 60s.) SoHo is the place and ground where the story of the artists and art world of the 60s and 70s flourished. A creative artist community thrives today preserved by the Loft Law into the '80s and beyond. This artistic vision may shrink and homogenize into a small plan of mid-town lite luxury towers for millionaires, office buildings, and big-box stores.

New revisions only created more legal confusion and made the proposal more dangerous. I ask

my representatives and the City Council members to reject this loophole-ridden sloppy plan. NYC Building Department staff did not answer questions concerning the Art Tax (equity, contradictions, and legal questions). Mayor de Blasio's race to the finish in his final days only benefits his real estate friends, big-money interests, lawyers, and the 1%. If this Trojan Horse up-zoning SoHo/NoHo/Chinatown plan passes, expect its blueprint to be a model throughout Manhattan and the other boroughs of New York City.

It is frustrating to hear such a weak and dangerous proposal presented at Tuesday's City Council committee hearing. Again no one listened to the community: the residents, our representatives, and especially after the diligent and meticulous work of the Land-use committee of Community Board 2, an open-minded thorough study of the thousands of pages listened to testimony from both the DCP and the community and made a list of problems with the Mayor de Blasio's proposal. The full CB2 voted it down 36-1.

Very concerning to Manhattan Borough President Gail Brewer was the absence of a guarantee of affordable housing (advertised but missing from the boilerplate and the protection of existing tenants, especially rent-stabilized. Loft-tenants and seniors. Tenant experts Chuck Delany (loft-law) and Mike McKee (rent-stabilization) testified that all the additional harassment, hotlines, and legal support would not stop the displacement of existing tenants through the state loophole in tenant law demolition or interior construction. Today, 29 buildings (photos now available) are set for demolition in the historic districts—what happens to those displaced? I had often asked that question, as had others. The DCP never had an answer. It seems like they don't care –everyone will be left to fend for themselves—survival of the wealthy and connected. Is this the NYC we have envisioned for our future? If you care about our beautiful city, historic districts, the arts, the environment, low-income housing, rent-stabilized and loft tenants, and our vulnerable seniors. If you care about community participation in the zoning process and the future of our great city, please vote no on the de Blasio SoHo-NoHo Up-zoning plan. It's sloppy, ridden with loopholes for developers, and will destroy our city. Vote NO! Send this plan back to the drawing board.

Support the community alternative plan, creating far more affordable-low income housing and saves existing tenants and the historic district.

Sincerely,

Susan Stoltz

495 Broome Street

New York NY 10013

From: [Susana Cervantes](#)
To: [Land Use Testimony](#)
Subject: [EXTERNAL] I support the SoHo/NoHo Rezoning
Date: Thursday, November 11, 2021 8:47:05 PM

Dear Members of the City Council

I support the SoHo/NoHo rezoning. I believe the rezoning will enable the creation of thousands of housing units to help fight the escalating housing shortage in our city and reduce rents / slow down the rent increases. This rezoning matters not just to SoHo/NoHo, but to the whole city. The housing shortage affects us all and adding units in SoHo/NoHo helps relieve the shortage across the entire city.

The 900 units in affordable housing will especially be crucial to allow middle class and working class families to share in the amenities and benefits of SoHo/NoHo, including the great access to transit, proximity to jobs, and access to one of the best school districts in the City. The 2300 market rate units are also important to reduce upward rent pressure by adding to the housing supply.

I also believe the plan requires small modifications: 1) to reduce the office densities to incentivize residential building; and 2) to expand the community preference for affordable housing to beyond Community District 2, and to neighboring communities in the Lower East Side and Chinatown to ensure economic and racial equity and integration.

Thank you,
Susana Cervantes
Astoria, Queens

THE NEW YORK
LANDMARKS
CONSERVANCY

November 9, 2021

STATEMENT OF THE NEW YORK LANDMARKS CONSERVANCY ON THE SOHO/NOHO REZONING BEFORE THE NEW YORK CITY COUNCIL SUBCOMMITTEE ON ZONING AND FRANCHISES

The New York Landmarks Conservancy was a member of the SoHo/NoHo Advisory Group and participated in several dozen meetings from 2019 to 2021. We agreed with the goal of the Group that the conveners presented to us: to update the zoning so it reflects the current residential and commercial realities of this area. We also support the goal of affordable housing. But, like most members of the Advisory Group, we cannot support this proposal.

The Advisory Group members agreed that the historic character of SoHo and NoHo should be preserved. The proposal would allow nearly doubling the size of new buildings in the historic districts. It's an invitation for out of scale commercial development, but is likely to provide little or no affordable housing in those areas. The proposal ignores the real quality-of-life concerns that the public and the Advisory Group brought up at every one of those many meetings.

This upzoning disregards the real and unique asset of these historic districts. SoHo doesn't have parks, open space, a surplus of school seats, playgrounds, athletic fields, libraries, reasonably-priced grocery stores, or community centers; and this plan does not address those issues. SoHo does have historic buildings, which form streetscapes that have attracted residents, artists, tourists, and economic development. The rezoning threatens those streetscapes, and the area's economic viability, by encouraging out-of-scale commercial development that will diminish the historic character.

But it will not provide the affordable housing that the Advisory Group, local advocates, and so many residents support. There are significant questions about how much affordable housing will be created, the levels of affordability, and whether loopholes will allow off-site affordable units, or none at all.

If it is built, the vast majority of the new housing will be in the sites outside of the historic districts, while the rezoning targets rare buildings that date back to the 1820s as prime development sites. No one is saying that there shouldn't be more housing, but there needs to be a balance that protects these resources.

The Department of City Planning has said that Landmarks Commission review will safeguard the historic districts. DCP brought in many City agencies to discuss their role in the rezoning, but LPC has not been part of that public engagement. If the rezoning is approved, LPC will be under enormous pressure to approve out of scale buildings that diminish the cohesive streetscapes of the historic districts. In fact, at a City Planning Commission hearing, one Commissioner said he hoped LPC would not be able to approve buildings lower than the proposed height limits.



**THE NEW YORK
LANDMARKS
CONSERVANCY**

There have been thoughtful and detailed alternative zoning proposals from the Cooper Square Committee and the NoHo-Bowery Stakeholders, members of the Advisory Group. All allow respectful development while protecting the historic character.

The Cooper Square Committee, which promotes affordable housing, shows that the City can achieve affordable units without damaging the historic districts. They also note the many loopholes that will allow developers to create out of scale buildings, but pay into a fund to build affordable housing elsewhere. They call for protections for tenants in currently affordable units.

The City needs to study these sensible alternatives and compromise.

The Conservancy would support zoning that recognizes contemporary commercial and retail uses, allows residential uses, protects artists, and encourages affordable housing, but does not require this massive upzoning. We ask that FAR increases be focused outside of the historic districts.

We also take issue with the process that led to this proposal. We believe strongly in community-based planning. Residents and building owners don't have all the answers but they can make an important contribution and their input should be valued. In this case, the proposal does not reflect the concerns that the Advisory Group or many of the members of the public raised in all of those meetings. That does a disservice to them and to the concept of community-based plans.

City Planning has called this neighborhood "high opportunity" and "transit rich" as if it was just a series of subway stations and bus stops. It is so much more than that. We ask you to remember this, listen to the Advisory group, and reconsider the alternatives. Working together, we can find a better plan that protects SoHo and NoHo and lets them thrive.

Thank you for the opportunity to express the Conservancy's views.

From: [Tim Dingman](#)
To: [Land Use Testimony](#)
Subject: [EXTERNAL] Let's rezone SoHo
Date: Wednesday, November 10, 2021 9:32:29 AM

Just adding my voice to the chorus calling for rezoning. More density means more affordable housing and a more sustainable planet for us all

From: [Tim Tucker](#)
To: [Land Use Testimony](#)
Subject: [EXTERNAL] Vote NO on SoHo/NoHo/Chinatown Upzoning Scheme
Date: Wednesday, November 3, 2021 1:42:05 AM

To the City Council:

I urge you to REJECT the SoHo/NoHo/Chinatown upzoning plan. This "proposal" is yet another giant giveaway to developers, dressed up with empty affordable-housing promises that will go unfulfilled. In fact, the "proposal" makes it more profitable to build without affordable housing than with. It will raze hundreds of existing units of rent-regulated and loft-law affordable housing, grievously harming lower-income, senior, artist, and Asian American residents. It will also harm small merchants with lavish incentives for giant big-box retail. Our neighborhood does not need, or want, more giant retail spaces -- we need more small merchants!

The community -- whom you supposedly represent! -- does not want the oversized development that will be promoted by this "proposal." Nor do we want to see the inevitable destruction of historic buildings that will occur because of this "proposal."

I put the word "proposal" in quotes because this is being treated as a fait accompli rather than as a real proposal whose approval is uncertain. But you have the power, and the responsibility!, to surprise the developers and vote NO on this nasty, exploitive, neighborhood-destroying scheme. PLEASE VOTE NO!

Regards,
Tim Tucker
93 4th Ave
New York, NY 10003

From: [TOMMY Shi](#)
To: [Land Use Testimony](#)
Subject: [EXTERNAL] Vote No on the SoHo/NoHo/Chinatown Upzoning Plan
Date: Thursday, November 11, 2021 7:03:39 PM

To the City Council:

I strongly urge the City Council to vote no on the disastrous SoHo/NoHo/Chinatown upzoning plan. This proposal would fulfill none of its affordable-housing promises, as it actually makes it more profitable to build without affordable housing than with. It will create huge incentives for destroying the hundreds of existing units of rent-regulated and loft-law affordable housing in the neighborhood, disproportionately occupied by lower-income, senior, artist, and Asian American residents, many of whom would be displaced. It will push out arts and any other small businesses with its allowance for giant big-box retail of unlimited size. It will encourage grossly oversized development up to 2.5 times the size current rules allow, and more than 2.5 times the size of average buildings here now. It will encourage the destruction of historic buildings, and allow developers to add luxury condos and apartments with no affordable housing so long as they don't exceed 25,000 sq ft per zoning lot. Even in this relatively wealthy neighborhood, new development even with the 25–30% “affordable” housing will still overall make the neighborhood richer, less diverse, and more expensive, as the new market-rate units would be so expensive and the “affordable” ones unaffordable to even a significant share of residents here.

The City has consistently lied about the impact the rezoning would have and who would be hurt by it. It's the lower-income tenant-renters, artists, seniors, and Chinatown residents who will be most hurt. Neighbors support an alternative plan for real affordable housing without displacement, oversized development, and big-box chain stores. Vote no.

Regards,
TOMMY Shi
21 E 10th St
New York, NY 10003

From: [William Toner](#)
To: [Land Use Testimony](#)
Subject: [EXTERNAL] Vote No on the SoHo/NoHo/Chinatown Upzoning Plan
Date: Thursday, November 11, 2021 7:10:40 PM

To the City Council:

I strongly urge the City Council to vote no on the disastrous SoHo/NoHo/Chinatown upzoning plan. This proposal would fulfill none of its affordable-housing promises, as it actually makes it more profitable to build without affordable housing than with. It will create huge incentives for destroying the hundreds of existing units of rent-regulated and loft-law affordable housing in the neighborhood, disproportionately occupied by lower-income, senior, artist, and Asian American residents, many of whom would be displaced. It will push out arts and any other small businesses with its allowance for giant big-box retail of unlimited size. It will encourage grossly oversized development up to 2.5 times the size current rules allow, and more than 2.5 times the size of average buildings here now. It will encourage the destruction of historic buildings, and allow developers to add luxury condos and apartments with no affordable housing so long as they don't exceed 25,000 sq ft per zoning lot. Even in this relatively wealthy neighborhood, new development even with the 25–30% “affordable” housing will still overall make the neighborhood richer, less diverse, and more expensive, as the new market-rate units would be so expensive and the “affordable” ones unaffordable to even a significant share of residents here.

The City has consistently lied about the impact the rezoning would have and who would be hurt by it. It's the lower-income tenant-renters, artists, seniors, and Chinatown residents who will be most hurt. Neighbors support an alternative plan for real affordable housing without displacement, oversized development, and big-box chain stores. Vote no.

Regards,
William Toner
36 Dahill Rd
Brooklyn, NY 11218

From: [YUKI IWASHIRO](#)
To: [Land Use Testimony](#)
Subject: [EXTERNAL] Vote no: Soho Noho Chinatown Up-zoning plan
Date: Wednesday, November 10, 2021 11:48:24 AM

I oppose the Chinatown-Soho-Noho Up-Zoning plan.
De Blasio's plan is being pushed through at the end of his tenure. Vote no to this plan. Too much is at stake and too much is being overlooked. Too quickly.

The Mayor's Plan for SoHo, NoHo + Chinatown DOES NOT WORK.

Urge the City Council members to VOTE NO on the Plan.

This plan has been fast-tracked through the Department of City Planning during the chaos and confusion of the Covid-19 pandemic, when uncertainty abounds and accurate community studies are nearly impossible. The SoHo/NoHo Neighborhood Plan cannot be fixed with any series of modifications. Any effort to make it "less bad" than what the Mayor's team has presented will still result in a reckless and irresponsible transformation of these two unique neighborhoods.

The stated goals will not be achieved. The goal of economic diversity is based on untested and faulty assumptions about development in Lower Manhattan. Actual "affordable" housing for our neighborhoods is not guaranteed. Instead there will be a massive increase in what we already have enough of: luxury dwellings.

The City's Plan fails to provide actual benefits. The plan proposes nearly a 50% increase in population for the neighborhoods, but with no accompanying infrastructure or improvements. We will get No Parks, No Schools, No Hospitals. Why? Because there is no City-owned land here on which to build. The Mayor's Plan is dependent upon the whims of private property owners, the dismantling of reasonable regulations and an unfettered real estate market. The "end benefits" to the community don't exist, and what are labeled as such are an illusion.

The Mayor's Plan DOES NOT WORK. Approving this sweeping proposal, especially in the final days of the administration of Mayor de Blasio (who will soon be gone, and cannot be held responsible for its efficacy), would further impair our quality of life all across the community, and destroy these unique neighborhoods.

The Mayor's Plan encourages oversized retail development, allowing a broad range of disruptive uses, especially **big box destination retail** with no community input, plus **eating and drinking establishments of unlimited size**. And it opens the door to **open-air, disruptive "entertainment" installations on roof-tops**.

The City dangles a false "solution" for residents (aka the "mechanism") which purports to allow coop and condo owners to convert JLWQA (Joint-live-work-quarters-for-artists) units into ordinary residential units. The city proposes this as "pathway to legalization" for residential owners, including those owning coop and condo units. They also claim this will add resale value to these units. But the details have neither been adequately examined nor clarified by the Department of Buildings.

In fact, it is nearly impossible to convert most of these buildings from manufacturing Use to residential Use, as the requirements for the building codes are different and incompatible. Even where possible, such building conversions would require a massive outlay of funds and the likely evacuation of the building as conversion work is performed.

The City's plan would impose a punitive and excessively high tax on artists who wish to sell their homes of \$100 per square foot. The City claims that money will be used as the sole financing source for a hazily-described "Artist Fund." But, as noted, **the conversion plan doesn't work**, so few will use that option. Meaning few will pay the fee. So the convoluted "Artist Fund" won't be funded. **Any implied "benefit" disappears.**

The Plan puts a target on existing rent regulated affordable housing in the neighborhood, including loft board protected tenants, providing a strong economic incentive for its demolition, and the **displacement** of its residents. The plan carelessly increases the opportunities for **tenant harassment**. Many of those who will be targeted are long-time residents who built these neighborhoods, and are now **senior citizens, aging in place**.

The Plan does not guarantee that a single unit of affordable housing will be built. Rather development, construction and conversion

favoring new office space is prioritized.

The Plan favors commercial property owners, providing a gift of value through the increase in Floor Area Ratio (FAR). That newly-granted FAR can be traded, transferred, borrowed against and sold, creating a casino all across and around SoHo & NoHo. The **FAR increase allows for 200+ Foot Towers to rise** within and around the historic districts, and across the neighborhoods.

The Mayor's Plan would encourage the demolition of historic buildings recognized at the city, state, and federal level. This would be the first major up-zoning for a shocking visual presentation of 29 buildings slated for demolition or construction in the SoHo National Historic District:
<https://tinyurl.com/ymur44zb>

The Plan from DCP serves the goals of political donors, especially the deep money of big real estate, by undermining and dismantling long-established NYC Landmark protections.

Yuki iwashiro

Yuki Iwashiro

[REDACTED]
yukiiwashiro@mac.com
