

December 18, 2020

Hon. Bill de Blasio, Mayor
City Hall, New York 10007

Hon. Marisa Lago, Chair, NYC Department of City Planning
120 Broadway 31st fl., y, New York, NY 10271

Hon. Gale Brewer, Manhattan Borough President
One Centre Street, 19th fl. So., New York, NY 10007

Hon Corey Johnson, NYC City Council Speaker
224 West 30th Street, Suite 1206, New York, NY 10001

City Councilmember Margaret Chin, District 1
101 Lafayette Street, 9th floor, New York, NY 10013

City Councilmember Carlina Rivera, District 2
254 East 4th Street, New York, NY 10009

City Councilmember Rafael Salamanca Jr., Chair, NYC Council Land Use Committee
1070 Southern Blvd., Bronx, NY 10459

City Councilmember Francisco Moya, Chair, NYC Council Zoning and Franchises Subcommittee
106-01 Corona Avenue, Corona, NY 11368

City Councilmember Adrienne Adams, Chair, Landmarks, Public Sitings, and Dispositions
165-90 Baisley Blvd., Jamaica, NY 11434

Re: Proposed Rezoning of SoHo and NoHo

Dear Mayor de Blasio, Chair Lago, Borough President Brewer, and City Councilmembers Johnson, Chin, Rivera, Salamanca, Moya, and Adams,

We write as organizations concerned about historic preservation in New York City to express our deep concerns about the Department of City Planning's current rezoning proposal for SoHo and NoHo, and to urge that the approach be rethought. While we all agree that there are improvements that could be made to the current zoning for these neighborhoods, we believe the proposed

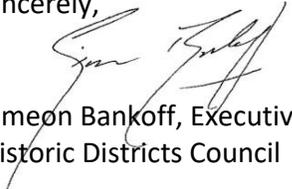
approach would do unnecessary damage in significant ways. At the same time, the plan's stated goals of addressing deficiencies in equity and affordability, invigorating the retail landscape, and improving (in some cases) outdated zoning can be achieved without harming the vital historic character of these neighborhoods, and a different approach would clearly engender significant community support.

Our concerns are as follows:

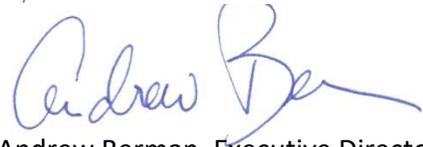
- A proposal for a large scale upzoning of a historic district as proposed (a minimum of 20%, a maximum of 140%, and 94% in much of the landmarked areas) is a problematic approach. Current zoning FAR allows buildings which fit or exceed the scale of the districts (both SoHo and NoHo have an average FAR below the currently allowable 5). Roughly sixty new buildings have been constructed in the proposed rezoning area in recent years under existing zoning FAR limits, some as tall as over 300 feet in height, and it is reasonable to assume that such construction would continue even without a change in the allowable FAR. Upzoning to allow buildings of double or more the average size of the district is inherently in conflict with the purpose of landmark designation.
- We recognize the need to address the demand for more affordable housing in these neighborhoods and throughout New York City, including in historic districts. But that can and should be addressed without the very substantial upzoning being proposed. Residents and local community groups have made clear they would support construction of affordable housing in the area, including via mandates for inclusion of affordable housing in new construction, at densities comparable to what is currently allowed. Because no residential FAR is currently allowed as-of-right in SoHo and NoHo, any rezoning to allow residential development, including at the current 5 FAR limit for commercial and manufacturing development, can trigger mandatory inclusion of affordable housing, without requiring the large upzoning proposed.
- In addition to fostering out-of-scale new development, the large proposed upzoning will create tremendous incentive for, and encourage the pursuit of, demolition of existing buildings, even within historic districts. It will also provide a great incentive for and encourage the pursuit of large additions to historic buildings, which will suddenly be substantially "underbuilt" under the new and vastly more generous zoning. While in an ideal world the Landmarks Preservation Commission would not approve such applications, in the real world, this will create tremendous pressure for them to do so. This will result in not only the loss of the historic buildings and character for which these neighborhoods are world famous, but in the loss of the affordable housing and the longtime residents and businesses found in existing buildings which may be demolished or substantially altered as a result of the incentives and pressure created by a significant upzoning.

Clearly the city is at an important inflection point in considering how to move forward following the COVID-19 pandemic in a sustainable and just manner, and to address critical needs in terms of affordability and equity. We support that effort, but also feel strongly that rash decisions should not be made that unnecessarily harm other vital aspects of our city and its communities. This includes the retention of historic buildings and character — which contain existing affordable housing and independent businesses — which has been so crucial to New York’s successes over the years. We thus strongly urge you to reconsider the current proposal.

Sincerely,



Simeon Bankoff, Executive Director
Historic Districts Council



Andrew Berman, Executive Director
Village Preservation



Rachel Levy, Executive Director
Friends of the Upper East Side
Historic Districts



Sean Khorsandi, Executive Director
Landmark West!