

**Bowery Alliance of Neighbors - Broadway Residents Coalition - City Club of New York
Chinese Staff and Workers Association - Downtown Independent Democrats
East Village Community Coalition - Kathryn Freed, Former City Councilmember
Friends and Residents of Greater Gowanus - Gowanus Artists In Alliance
Historic Districts Council - Lower East Side Preservation Initiative
Met Council on Housing - Metro Area Governor's Island Coalition
National Mobilization Against Sweatshops - New York City Loft Tenants
NoHo Neighborhood Association- Preservation League of New York State
Sierra Club NYC - SoHo Alliance - Tenants Political Action Committee
Village Independent Democrats - Village Preservation - Voice of Gowanus**

December 14, 2021

Re: Opposition to Revised SoHo/NoHo/Chinatown Upzoning

Dear City Councilmember:

We are organizations from across the neighborhoods directly affected by this proposed rezoning, as well as from across New York City and State, and beyond. We represent thousands of individuals and a broad range of interests and concerns. But we share a common message as it relates to the revised SoHo/NoHo/Chinatown Rezoning proposal before the City Council. **We strongly urge you to reject the revised plan**, which falls far short of addressing the concerns we have long expressed about the likelihood of the plan failing to produce much if any affordable housing, while threatening historic buildings and existing affordable housing, displacing lower income residents, small businesses, and arts-related uses, and producing an excess of oversized office buildings, hotels, big box chain stores, and luxury condos and rentals.

We believe that the revised plan continues to be worse than maintaining the status quo, and urge the Council to reject the plan and restart the process, taking a fundamentally different approach.

Specifically, our reasons for urging you to oppose the plan include:

- Even as revised, the plan is unlikely to result in the creation of any significant amount of affordable housing, due to multiple loopholes and exemptions in the plan. The allowable commercial densities, combined with the exemption from providing affordable housing for developments with 25,000 sq. ft. of residential uses per zoning lot or less, means the plan continues to make it financially enticing and more profitable for developers to build without any affordable housing than with.

- Even with affordable housing included, the developments the plan will create will actually make these neighborhoods wealthier and less diverse, and their housing more expensive, than the current neighborhood, thus undermining the supposed affordability and equity purpose of the rezoning. The 75% of such new developments that will be super-luxury market-rate housing would house residents with income levels greater than all but the top 5-10% of current neighborhood residents due to the extraordinarily high prices for new market-rate development in the neighborhoods, while the 25% of new developments which are “affordable” would require incomes which are higher than the lowest 25% of income earners in the neighborhood, many of whom would be displaced for new developments.
- The revised plan continues to put a target on existing rent regulated affordable housing in the neighborhood, providing a strong economic incentive for its demolition and the displacement of its residents — predominantly low-to-moderate income, and disproportionately seniors, artists, and Asian Americans. With these losses, the plan is likely to result in a net loss of affordable housing in the rezoning area.
- The revised plan continues to disproportionately impact Chinatown and its predominantly Asian American residents, targeting that area and its residents for the largest upzoning, and creating the largest incentive for displacement.
- The revised plan will still force out independent and arts-related businesses, making it difficult for anything other than big box destination chain retail and mega-bars and restaurants to survive in these neighborhoods, with its allowance for retail and eating and drinking establishments of inappropriately large size.
- The revised plan continues to encourage and allow oversized development in the area — up to 12 FAR, the greatest legally allowable density in New York State for residential use, which is two and a half times the size current rules for this area allow, and two and a half times the size of average building size in the neighborhood currently.
- The revised plan continues to encourage the demolition of historic buildings recognized at the city, state, and federal level.
- The revised plan does nothing to discourage the construction of vertical enlargements of buildings with 100% super-luxury housing and no affordable housing so long as they don’t exceed 25,000 sq ft per zoning lot. Such additions, unaccounted for in the environmental analysis, will not only destroy the character of the neighborhood and bring even more super rich residents. Their construction is frequently used as a tool to harass or push out long term lower income tenants in rent regulated housing in such buildings.
- The revised plan continues to impose a punitive and excessively high tax on artists who wish to sell their homes.

- The revised plan does not protect the artists who have long been a foundation of these neighborhoods, but make their continued presence in the neighborhood more tenuous and difficult.
- The revised plan will still have an extremely negative impact upon the environment, by encouraging vastly increased density of development in an area with existing intractable pollution hot spots, and by encouraging demolition rather than adaptive reuse.
- The revised plan greatly increases incentives for, and the likelihood of, harassment of tenants, and offers no real mitigations for this vastly increased pressure – neither more funding for outreach, assistance, or education, nor the city’s anti-harassment program, are a match for the financial incentives the revised plan provides for landlords and developers to try to push out rent-regulated tenants and permanently destroy their rent-regulated housing.
- Various community stakeholders have offered alternative approaches and plans to address legitimate issues regarding outdated zoning, restrictions on reasonably-sized retail, legalization of non-artist residents, and creating new affordable housing. But these have been ignored and are not reflected in this plan. In fact, this plan as structured will likely do more harm than good in these regards.
- Even with the revisions, this rezoning plan will not accomplish its purported equity or affordability goals, and will likely do much more harm than good. The plan remains an outrageously generous gift to developers, with little true promise of public benefit, and a great likelihood of significant damage to the public good. **We strongly urge you to vote no.**

Sincerely,



Andrew Berman, Executive Director
Village Preservation



Martin Bisi
Gowanus Artists In Alliance



Richard J. Corman, President
Downtown Independent Democrats

Pete Davies

Pete Davies
Broadway Residents Coalition

Chuck DeLaney

Chuck DeLaney
New York City Loft Tenants

Jay DiLorenzo

Jay DiLorenzo, President
Preservation League of New York State

Mar Fitzgerald Cameron Krause

Mar Fitzgerald and Cameron Krause, Co-Presidents
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KATHRYN FREED

Kathryn Freed, Former City Councilmember
1st District (SoHo, NoHo) 1992-2000

Alan J. Gerson

Alan J. Gerson
Sierra Club NYC

Stephanie Kranes

Stephanie Kranes
National Mobilization Against Sweatshops

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Roger Manning

Roger Manning
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Margaret Maugenest
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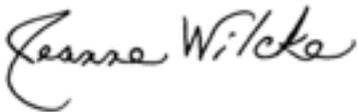
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