



June 23, 2021

**STATEMENT OF THE NEW YORK LANDMARKS CONSERVANCY ON THE SOHO/NOHO REZONING BEFORE THE SOHO/NOHO WORKING GROUP OF COMMUNITY BOARD 2, MANHATTAN**

The New York Landmarks Conservancy is a 48-year old preservation organization. We served on the SoHo/NoHo Advisory Group, attending several dozen meetings from 2019 to 2021. We concurred with the goal of that Group, that zoning should reflect the current residential and commercial realities of this area, but we cannot support this proposal, which threatens the unique qualities that define SoHo and NoHo.

All members of the Advisory Group agreed that the historic character of the SoHo and NoHo Historic Districts should be preserved. The Group understood that historic cast-iron buildings and the legacy of an artists' community are what draws people to this neighborhood, and fuels an economic engine of residents, workers and visitors.

Instead, this proposal threatens the historic districts by allowing FAR to nearly double and setting height limits that will dwarf adjacent structures in large sections of the historic district. The rezoning has been framed as a way to create affordable housing, but it is just an invitation to developers. New buildings in the historic districts will not create affordable housing in a meaningful way.

We agree with the Cooper Square Committee, a respected non-profit whose mission is to create and protect affordable housing. They have stated that more than 80 per cent of the "likely" affordable units that might be built over the next 10 years will take place in the areas outside of the historic districts. "In addition to the out-of-scale development it will promote, it has too many loopholes that will allow for developers to damage the historic districts through building enlargements with no affordable housing required," CSC said in May. It added that new luxury housing could be built with no affordable housing on site because the developer will pay into a fund to build it elsewhere.

The Department of City Planning has often said that Landmarks Commission review will protect the historic districts. However, many of the sites that DCP has designated as projected or potential for development contain historic buildings that contribute to those districts. Throughout the planning process, DCP brought in City agencies to discuss their role in the rezoning, but LPC has not been part of that public engagement. In fact, at the recent City Planning Commission hearing, one Commissioner commented that he hoped LPC would not be able to approve buildings lower than the proposed height limits.

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

SoHo and NoHo's historic character enabled them to become the thriving, mixed-use neighborhoods that attract people from around the City and around the world. This rezoning risks their viability. Thank you for the opportunity to express the Conservancy's views.