

## TESTIMONY BEFORE COMMUNITY BOARD 2, MANHATTAN

In Opposition to the Proposed SoHo/NoHo/Chinatown Upzoning

Presented by Alan J. Gerson

On Behalf of The Sierra Club, NYC Group

July 26, 2021

Good evening. As I think most of you know, my name is Alan Gerson, and I am a lifelong resident of Community Board 2 and your former Board Chair and Councilperson. I come to you tonight as a representative of the Sierra Club NYC group, and the Chair of its Urban Sustainability Committee and Member of its Executive Board. The Sierra Club is our nation's largest and oldest environmental organization, and we boast over 15,000 members here in New York City.

The Sierra Club strongly opposes the proposed SoHo/NoHo/Chinatown upzoning. We view this proposal as a segway to an environmental disaster for community residents and for our City's overall human and environmental ecology.

Any plan which incentivizes widespread demolition and reconstruction within such limited confines can only result in harmful, unhealthy levels and concentrations of noise, dust, and harmful emissions, including carcinogenic emissions. Coming off of a pandemic when evidence points to greater susceptibility to contagion from the toll such elements take on pulmonary and other bodily functions, the Sierra Club finds this plan particularly detrimental to environmental and human health. At the very least, plan proponents should have undertaken a full, scientific analysis of possible environmental and health impacts of potential demolition and reconstruction as well as reinforcing and building on top of existing structures. Their failure to do so provides sufficient reason for rejecting this plan.

But, even if we could wave a magic wand and jump to the likely end result of this plan without the construction period problems, the Sierra Club would still find this upzoning environmentally disastrous.

The Sierra Club has long recognized excessive population density as deleterious to human well being, and a reasonable density level as integral to a sound human ecology. Allowing the possibility of the equivalent of four Empire State Buildings with new residents or commercial enterprises within the boundaries of this upzoning plan flies against this cardinal environmental principle by any reckoning. My mother, your former Community Board Member, always spoke of the imperative to maintain a livable human scale, and of course she was right.

To make matters worse, the plan includes none or a woefully insufficient amount of environmental mitigation or accomodation which the Sierra Club holds as essential for any heightened urban development or population increase. This includes increase in green space, park space, open space, and tree planting in sufficient proportionate abundance to potential resident or worker population increases. This includes assurance that any new development achieves carbon neutrality and promotes the carbon neutrality of its neighborhood, including the use of alternative green energy for power. This includes a concomitant upgrade of infrastructure, from sewage to schools, to meet additional burdens. This includes provision for direct sunlight on the streets and open areas where people walk and recreate. This upzoning fails to meet these environmental standards, and for that reason also warrants rejection.

We all know that SoHo, NoHo, and Chinatown currently constitute traffic congestion disasters, with ongoing damage to air quality and danger to health and safety. It amounts to the height of governmental irresponsibility for the City to propose any plan for these areas which not only fails to solve the traffic problem but exacerbates traffic pollution and danger from the the inability of emergency vehicles to

make their way in a timely manner through gridlock, especially important in the ongoing aftermath of the loss of St. Vincent's hospital. The plan's allowance for big box stores becomes particularly egregious in this regard as those stores attract private and car service vehicles bringing customers from afar. These big box stores will also decimate many small businesses, taking character, opportunity and money out of the communities.

On a macro level, the Sierra Club NYC group does not automatically oppose all high rise development, but we fight for the proper urban ecology balance between high rise and low rise neighborhoods and areas. The current trend to making New York City, starting with Manhattan, a high rise monolith jeopardizes our City's attractiveness and livability. Any healthy ecology strikes a balance of diversity. A City which becomes a canyon of extended non-stop high rise development becomes a City of diminished humanity. SoHo's, NoHo's, and Chinatown's historic low rise character remain absolutely critical to preserving that balance. Upzoning these communities to a 12 FAR - greater than many high rise uptown residential areas - brings our City too far towards that unhealthy, undesirable high rise monolith.

I would like to conclude by making three personal points which comport with the Sierra Club's position.

When I served as your Councilmember, we significantly expanded the SoHo and NoHo historic districts. Working with this Community Board, I count that as one of my many major accomplishments. So I take this personally. But make no mistake, this proposed upzoning, along with that of the South Street Seaport Historic District, is a frontal attack on all historic districts. If we don't hold the line here, our City will lose everything we value in and the very reason for historic districts in the first place.

My office also introduced the concept of Arts Community Zoning for SoHo and NoHo. We put in place restrictions on new eating and

drinking establishments in special manufacturing districts in part to stem the loss of art galleries and to preserve an environment which allowed for artists' living and working in the same loft space. My office made it clear that we would not even consider any zoning adjustment or variance unless it incorporated space for art creation or display. SoHo and NoHo and yes, Chinatown still contain a significant concentration of working artists and art facilities. This upzoning plan, with no recognition of the place of the arts in these communities, will lead to the displacement of the artists and the arts to the great, long term detriment of our City's culture and economy. The Sierra Club views the arts as an important part of the diversity of our urban ecology. Its diminution devalues our City's vibrancy and spirit.

Finally, while in office I led the preservation or creation of thousands of affordable units in Council District 1. I can tell you with absolute certainty, as the Community's alternative plan demonstrates, that the notion that additional affordable housing requires this upzoning is an absolute falsehood. My office generated the definitive study at the time that if the City failed to preserve existing affordable housing we would lose far more affordability than we could ever create. This plan, as others also have pointed out, does precisely that - it will destroy a greater amount of existing truly affordable housing than it will ever create, displacing low income residents, especially in Chinatown. The Sierra Club nationally has recently clarified its mission to make clear the Club's commitment to social justice as part -and -parcel of its environmental commitment. We view any plan such as this which jeopardizes existing affordable housing as a travesty of social injustice.

For all of these reasons, which we will expound and detail in upcoming hearings as the ULURP process proceeds, we strongly urge Community Board 2 to reject this ill-conceived upzoning proposal.