



December 7, 2020

Hon. Bill de Blasio
Mayor of New York City

Hon. Gale Brewer
Manhattan Borough President

Hon. Carlina Rivera
NYC Council Member

Hon. Corey Johnson
NYC Council Speaker

Hon. Margaret Chin
NYC Council Member

Dear Mayor de Blasio, Borough President Brewer, and Council Members Chin and Rivera,

Enclosed please find a Resolution approved by Downtown Independent Democrats General Membership on December 7, 2020:

Resolution to Pause and Revise the City's Plan for SoHo/NoHo

The City's current plan creates significant value for current property owners, and incentivizes office development and big-box retail instead of adaptive reuse, new affordable housing and the preservation of the significant stock of affordable housing.

DID urges the City to complete promised studies and additional analysis after the pandemic state of emergency has lifted and to develop a plan that:

- Maintains the integrity of the impacted Historic Districts,
- Guarantees greater opportunities for affordable housing,
- Addresses displacement,
- Includes zoning that allows office to residential conversion and does not incentivize office and dormitory over residential use or big-box retail over small business,
- Defines clear "mechanisms" to legalize existing residential occupancies incorporating public review and input, and,
- Presents an economic analysis of the upzoning and how the Plan will impact transferable development rights.

Sincerely,

Richard Corman
President, Downtown Independent Democrats

Enclosure

cc: Hon. Chuck Schumer, U.S. Senator
Hon. Kirsten Gillibrand, U.S. Senator
Hon. Carolyn Maloney, U.S. Representative
Hon. Jerrold L. Nadler, U.S. Representative
Hon. Nydia Velázquez, U.S. Representative
Hon. Andrew Cuomo, NYS Governor
Hon. Andrea Stewart-Cousins, NYS Sen. Leader
Hon. Carl Heastie, NYS Assembly Speaker

Hon. Brad Hoylman, NY State Senator
Hon. Brian Kavanagh, NY State Senator
Hon. Harvey Epstein, NY State Assembly
Hon. Deborah J. Glick, NY State Assembly
Hon. Yuh-Line Niou, NY State Assembly
Hon. Scott M. Stringer, NYC Comptroller
Hon. Jumaane Williams, NYC Public Advocate
Carter Booth, Chair, Manhattan Community Board 2



Resolution to Pause and Revise the City's Plan for SoHo/NoHo

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Whereas:

1. Any rezoning plan for SoHo and NoHo must satisfy a number of key principles and objectives that the local community identified during the extensive 2019 SoHo NoHo Envision process, including to:¹
 - a. Protect and preserve SoHo and NoHo's historic districts;
 - b. Ensure and expand non-student, affordable housing;
 - c. Minimize displacement in SoHo and NoHo and surrounding neighborhoods;
 - d. Promote SoHo and NoHo mixed-use character, unique in the City for significant parts retail/commercial, office and residential; and,²
 - e. Legalize and maintain existing housing units, preserve Joint Live Work Quarters for Artists ("JLWQA") and expand to categories of non-artists.
2. The SoHo NoHo Neighborhood Plan, put forward by the NYC Department of City Planning on October 28, 2020 (CEQR No. 21DCP059M)³ in the midst of the unprecedented and ongoing Covid-19 health crisis, fails to meet the community recommendations cited above, the goals documented within the Plan itself, and the twelve "Next Steps" documented in the Envision SoHo/NoHo report;⁴
 - a. The Plan fails to protect and preserve historic districts:
 - i. **First Proposed Upzoning of Historic Districts:** This is the City's first proposed upzoning of an entire Historic District and, if approved, would have ramifications for every Historic District across the City.⁵ However, the proposed upzoning within the landmarked districts is unnecessary

¹ In 2019, the Department of City Planning, Borough President Gale Brewer and Councilmember Margaret Chin initiated a six-month engagement process that included an 18-member Advisory Group, 40+ meetings, six public meetings/workshops, 17 Advisory Group meetings, eight focus group meetings with various stakeholder groups, and numerous other individual meetings with key stakeholders, culminating in the City's 85 page report, [Envision SoHo/NoHo: A Summary of Findings and Recommendations](#) ("Envision SoHo/NoHo Report").

² Envision SoHo/NoHo Report, page 37.

³ [SoHo/NoHo Neighborhood Plan Draft Scope of Work for an Environmental Impact Statement](#), October 28, 2020 ("The Plan"). The Plan would replace M1-5A and M1-5B zoning with M1-5/R7X, M1-5/R9X and M1-6/R10 zoning, with several several modifications and identifies 27 Projected Development Sites that over the next 10 years are expected to produce 2 million gross square feet (gsf) of development, including 1,699 dwelling units and 330-498 affordable units, 413 units at the 25% affordable housing midpoint. See Appendix A for map and graphic overview.

⁴ Envision SoHo/NoHo Report, pages 84-85.

⁵ New York Landmarks Conservancy, Peg Breen: "SoHo/NoHo Upzoning Overkill," <https://nylandmarks.org/news/soho-noho-upzoning-overkill/>.



because the Plan could achieve 71% of the projected total GFA without upzoning any historic districts in SoHo and NoHo.⁶

- ii. **Underestimates the Impact of the Proposed Upzoning.** The Plan vastly underestimates the impact of the proposed upzoning of historic districts to R7X and R9X because it excludes from the Projected Development list any site, other than vacant lots, located within historic districts, solely because these sites are “subject to LPC review and approval”;⁷ even though, the Plan changes zoning for over 800 lots across 146 acres⁸, a 56-block area, 85% of which lies within protected Historic Districts.
- iii. **Fails to Adequately Consider the intent of the NYC Landmarks Law,** and the implications of the Plan in relation to that law, which mandates that providing such protections is “a public necessity and is required in the interests of the health, prosperity, safety and welfare of the people”⁹ and that historic preservation is an essential civic service for “the education, pleasure and welfare of the people of the City.”¹⁰ By limiting its scope, the Plan fails to address the full impact of proposed changes on the nearly 8,000 existing residents. Neither does it offer any financial analysis regarding the changes and the resultant impacts, both locally and more broadly.

b. The Plan fails to ensure and expand affordable housing:

- i. **No Affordable Housing Guaranteed:** The Plan, based on market forces, does not guarantee any housing will be built, since:
 - 1. “Inclusionary zoning is always voluntary, and no development occurs without the expectation of a threshold rate of return on investment,”¹¹
 - 2. There are strong incentives for office and dormitory use, and
 - 3. The pre-Covid luxury condo glut will temper any business decision to build new housing, both luxury and affordable;¹² and,
 - 4. Under Mandatory Inclusionary Housing (MIH), developers can apply for a special permit to reduce or modify MIH requirements

⁶ None of the 16 Projected Sites located in the proposed R10 districts are located entirely within a historic district. For sites partially located within and partially outside historic districts, the City assumes “that it is possible to concentrate future development on portions of the lot outside of historic districts where LPC review is not required, Plan, page 24.

⁷ The Plan, page 24.

⁸ The Plan, page 1.

⁹ NYC Admin. Code: Chapter 8-A Section 205.1.0(b) [1976]

¹⁰ NYC Admin. Code: Title 25 Chapter 3: Landmarks Preservation Preservation and Historic Districts; § 25-301 Purpose and declaration of public policy.

¹¹ Eric Kober, “De Blasio’s Mandatory Inclusionary Housing Program, What is Wrong, and How It Can Be Made Right,” *Manhattan Institute*, January 16, 2020, page 4, www.manhattan-institute.org/deblasios-mandatory-inclusionary-housing-program.

¹² Manhattan’s glut of luxury condos could take 6 years to sell, *Curbed New York*, January 7, 2020, <https://ny.curbed.com/2020/1/7/21052259/manhattan-luxury-condo-glut-years-to-sell>



“in cases of hardship” where “requirements would make development financially infeasible”¹³ or opt to pay into an Affordable Housing Fund for buildings from 10 to 25 units or 12,500 to 25,000 sq.ft.

ii. **Fails to Evaluate Higher-Percentage Affordable Housing Alternatives.** For example:

1. Redevelopment of the federally-owned underutilized parking garage at 2 Howard Street for both high-percentage affordable housing and government parking, now that there is a more favorable administration in Washington; and,
2. Purchase of distressed assets to be redeveloped as high-percentage affordable and/or supportive housing, in light of the near term office market glut and drop in tourism.

c. The Plan threatens to displace residents:

- i. **Failure to Evaluate Displacement of Existing Residents:** The Plan will increase vulnerabilities of approximately 1,500 rent stabilized units,¹⁴ including more than 500 in the R10 “housing opportunity” subdistricts, and more than 400 IMD Loft Law units that have not yet been converted to rent stabilized status under current law (see Appendix B at the end of this Resolution detailing 602 units at risk of displacement). This brings into question the City’s assumption that there will not be direct displacement of more than 500 residents, and its claim that the SoHo/NoHo rezoning “would not typically be expected to alter the socioeconomic characteristics of a neighborhood.”¹⁵ During the City’s October 26, 2020 zoom presentation, it admitted that it has not performed the necessary studies to investigate potential for displacement within the study area.
- ii. **Inadequate Protections for Current Renters, Including Many Seniors Aging in Place.**¹⁶ The Plan fails to “maintain, enforce and strengthen existing protections for residents including renters and those in rent-regulated units,” one of seven goals in the November 2019 *Envision SoHo/NoHo report*.¹⁷ Instead, the conversion from existing M zoning to new R or C zoning will remove protections directly related to work created and practiced within the unique JLVQA units that were established

¹³ The Plan, page 18.

¹⁴ Manhattan Rent Stabilized Building List, Rent Guidelines Board, City of New York, July 2020, retrieved November 24, 2020, <https://rentguidelinesboard.Cityofnewyork.us/wp-content/uploads/2020/07/2018-HCR-Manhattan.pdf>

¹⁵ The Plan, page 27

¹⁶ Envision SoHo NoHo Report, page 61. “SoHo/NoHo’s long-time residential community that rents and is aging in place faces particular challenges. The desire for rental assistance to assist low-income artists and non-artists alike who struggle with affordability of this area has been community as a concern throughout the community engagement process.”

¹⁷ The Plan, page 15.



specifically for the M1-5A and M1-5B districts. Further, real estate speculation, brought on by rezonings, is known to increase the instances of harassment aimed at rent regulated tenants. This is of particular concern for the numerous senior residents who were part of the pioneering movement that transformed these neighborhoods, have lived in SoHo and NoHo for decades, and are now aging in place. Yet, the City has now suddenly up-ended their security, imperiling their health and well being.

- d. The Plan compromises the mixed-use character of SoHo and NoHo:
- i. **The Plan's FAR Increases Give Millions of Dollars of New Value to Property Owners with No Discernable Public Benefit.**
 - 1. Yet, the City fails to offer any accompanying financial analysis that either explains or justifies the proposed changes that will fundamentally alter the neighborhoods; and,
 - 2. The Plan is silent on height caps and how the proposed special district would impact the transfer of development or air rights.¹⁸
 - ii. **R10 Zoning Incentivizes Office and Dormitory Use, not Housing.** The Plan claims that R10 zoning will produce 72% of the residential GFA, but this is unrealistic because:
 - 1. R10 zoning allows 10 FAR for commercial and dormitory uses without any subsidy for Mandatory Inclusionary Housing (MIH),
 - 2. Property owners have chosen to build office space instead of housing in nearby Hudson Square and 550 Washington, including new headquarters for Disney and Google: and,
 - 3. Developers are planning to build a new 100,000 sq. ft. office building at 358 Bowery, one of the DCP sites where the City projects residential development.¹⁹
 - iii. **Modifications Incentivize Office Use, not Adaptive Reuse:**
 - 1. The Plan's modification to retain existing non-residential floor area, despite the current glut of office space, disincentivizes adaptive reuse of existing office buildings for residential use,^{20,21}
 - 2. This modification also requires certification by the Department of City Planning which a) is not subject to public review, and b) adds a new city approval for *each* project, even though the Plan seeks

¹⁸ Michelle Sinclair Colman, “[Understanding the Power of Air Rights](#),” City Realty, December 18, 2017 and Michael Smith, “[Buying Air Rights in New York City: What You Need to Know About the NYC Development Rights Endorsement](#),” *New York Real Estate Journal*, March 16, 2018.

¹⁹ Brenzel, Kathryn. “These developers could benefit the most from Soho’s rezoning.” The Real Deal, November 24, 2020, available at therealdeal.com/2020/11/24/these-developers-could-benefit-the-most-from-sohos-rezoning/

²⁰ Greg David, "New York City's Growing Office Space Glut Heads to Post-9/11 Record," *TheCity.NYC*, October 15, 2020.

[www.theCity.nyc/2020/10/15/21518594/new-york-City-office-space-glut-lease-9-11-record.](http://www.theCity.nyc/2020/10/15/21518594/new-york-City-office-space-glut-lease-9-11-record)

²¹ The Plan, page 17.



to replace zoning that relies “on individual land use applications and ad hoc approvals” and is purportedly designed to reduce special permits, variances and regulatory burdens that “fall disproportionately on smaller businesses.”²²

- iv. **Modifications Prioritize Big Box Retail:** The Plan prioritizes big box retail over small businesses by permitting department stores over 10,000 sq. ft.²³ despite the November 2019 *Envision SoHo/NoHo* goal to “foster the small business community”²⁴ and makes erroneous claims²⁵ about local retail vacancies²⁶ to justify the expansion of both use group 10, department stores and destination retail and use group 6, that includes eating and drinking establishments, both of which are currently limited in size due to the known conflicts created by such large operations.^{27,28}
 - v. **Prioritizes Parking Over Housing:** The Plan would require parking for up to 40-50% of dwelling units, without considering modifications that take into account how SoHo and NoHo are located in one of the most transit-accessible and traffic-clogged neighborhoods in the City. The justifications for such off-street parking requirements are cited as “weak rationale” by the American Planning Association,²⁹ and any such requirement for SoHo / NoHo needs to be rethought.
- e. The Plan fails to legalize and maintain existing housing units, and provides no documented mechanism for Joint Live-Work Quarters, nor the timeline for its creation;
- i. **Fails to Address the Legalization of Existing Housing Units,** a key goal outlined in the *Envision SoHo / NoHo* report.³⁰ The City’s plan fails to include protections for Loft Law tenants and detail the mechanism for voluntary conversion of JLWQA units. The effort to ensure safe and affordable housing within SoHo and NoHo has been at the core of DID since its inception,³¹ led by neighborhood pioneers who joined together

²² The Plan, pages 14 and 18.

²³ The Plan would permit as-of-right both “Use Group 10 retail uses, such as department stores over 10,000 zsf, and “[physical culture establishments](#),” page 17.

²⁴ The Plan, page 6.

²⁵ The Plan, page 14.

²⁶ RETAIL ACTIVITY in NYC: Covid Recovery Across 24 Neighborhoods (September 2020; Page 24: Canal Street Survey Results);

<https://www1.nyc.gov/assets/planning/download/pdf/planning-level/housing-economy/retail-activity-nyc-covid-recovery.pdf>

²⁷ Matter of the SoHo Community Council v New York State Liquor Authority (January 16, 1997); <https://casetext.com/case/soho-community-v-liq-auth>

²⁸ NYC DOB Enforcement Action Bulletin, February 2019;

https://www1.nyc.gov/assets/buildings/pdf/0219_enforcement_action_bulletin.pdf

²⁹ The Pseudoscience of Parking Requirements; Donald Shoup, FAICP (APA; February 2020):

<https://www.planning.org/publications/document/9194519/>

³⁰ *Envision SoHo/NoHo*, page 64: Figure 3.2: Potential JLWQA Pathways

³¹ DID History; <https://www.didnyc.org/club-history>



and transformed the area³² from a fading warehouse district into a unique mixed use neighborhood where the arts thrived, a model of urban adaptive re-use that has been copied around the world. This led to the passage of the NYS Loft Law and the creation of hundreds of housing units, designated under the area's Manufacturing zoning as Joint Living-Work Quarters for Artists.³³

3. The City is facing an unprecedented fiscal, health and education crisis, where the current patterns of live-work, retail and transportation use reflect neither the state of the City prior to the pandemic, nor what the state of the City may be after the pandemic. Consequently, any scoping and study process at this time will be flawed, and any decisions made based on the pandemic state of affairs will fail to reflect the long-term state. The following tasks in the Plan cannot be adequately assessed during the current health emergency: energy, transportation, air quality, greenhouse gas emissions and climate change, noise, public health and neighborhood character.³⁴ It is irresponsible to move forward without providing adequate studies to mitigate the adverse impacts of these zoning changes.

Therefore be it resolved that Downtown Independent Democrats Urges the City to:

1. Pause and revise the DCP plan for SoHo and Noho, which despite the public rhetoric, creates significant value for current property owners, and incentivizes office development and big-box retail instead of adaptive reuse, new affordable housing, and the preservation of the significant stock of affordable housing;
2. Complete additional studies after the pandemic state of emergency has lifted, so that the City can measure a baseline normal state of live-work patterns in SoHo and NoHo, rather than making assumptions based either on the current pandemic state or on interpolations of data previously collected prior to the current health emergency; and,
3. Develop a revised plan that must:
 - a. Maintain the integrity of the impacted Historic Districts, to fulfill the City's duty as guardian for the education, pleasure and welfare of the people of the City;
 - b. Guarantee greater opportunities for affordable housing, including higher-percentage affordable housing alternatives such as the redevelopment of 2 Howard Street and the purchase and redevelopment of distressed properties;
 - c. Address the displacement of current residents;
 - d. Include zoning that allows office to residential conversion and does not incentivise office and dormitory over residential use or big-box retail over small business;

³² Jim Stratton, "Pioneering in the Urban Wilderness", (1977), jimstrattonscifi.com/pioneering-in-the-urban-wilderness/

³³ Envision SoHo/NoHo Summary of Findings & Recommendations, page 30

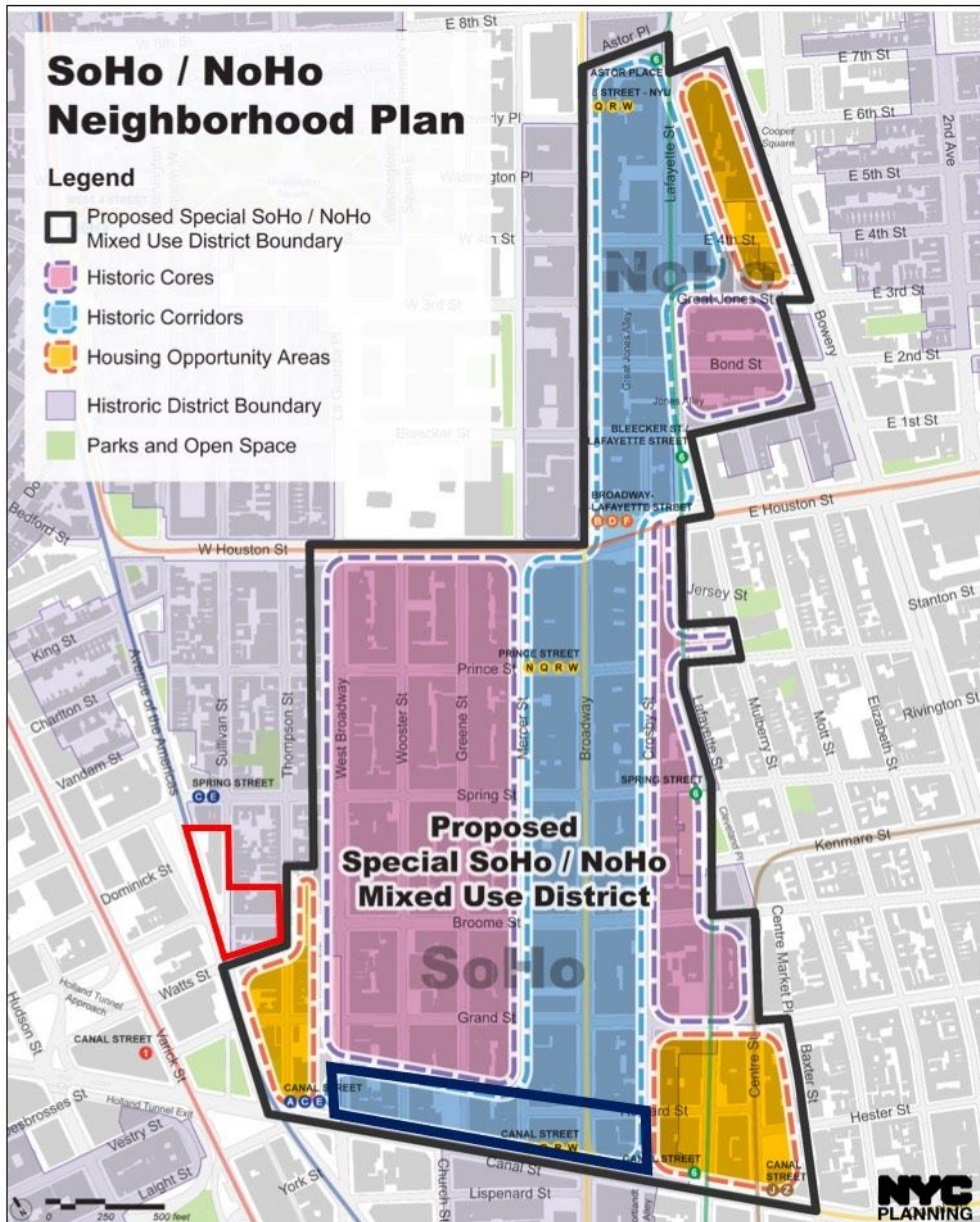
³⁴ The Plan, pages 39-49



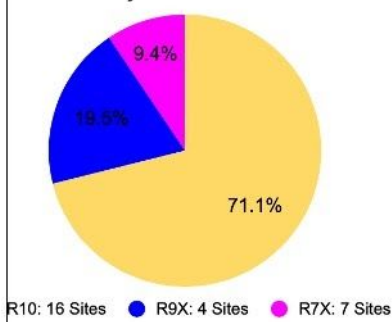
- e. Establish and clarify the City's proposals for the "mechanisms" needed to legalize existing residential occupancies, including the "options" that will be available, and present said proposals for review and input; and,
- f. Present a complete economic analysis related to the proposed increase of FAR, including the allotted price per sq. ft. for any FAR increases, applicable to each property lot within the zoning districts and how the Plan will impact transferable development rights.

Approved by Downtown Independent Democrats Membership: December 7, 2020

Appendix A. Overview of Proposed Zoning Changes



Percent of GFA by Zoning
71% of Projected Sites Zoned R10



	Broadway	Canal	Historic Cores	NoHo-Bowery, SoHo E & W
Proposed Use & FAR	M1-5/R9X * modifications	M1-5/9X	M1-5/R7X	M1-6/R10
Comm/Mfg	6	5	5	10
Res w/ MIH	9.7	9.7	6	12
Comm Fac	6.5	6.5	6.5	10

Source: ["SoHo/NoHo Neighborhood Plan Public Scoping Meeting Presentation,"](#) NYC Department of City Planning, December 3, 2020, page 24. *Red area removed from Study Area, originally included in October 7, 2020 map.*



Appendix B. List of Affordable Housing in SoHo/NoHo At Risk of Displacement

Rent-Stabilized Housing at Risk of Displacement in R10 / “Housing Opportunity Areas”

The following is a detailed list of buildings that include more than [600] dwelling units (“du”) that are at risk of displacement under the City’s Plan:

1) SE SoHo:	150 du
2) SW SoHo:	287 du
3) NE NoHo:	<u>165 du</u>
Total Units at Risk SoHo / NoHo	602 du

Sources

- HCR* (NYS): <https://rentguidelinesboard.Cityofnewyork.us/wp-content/uploads/2020/07/2018-HCR-Manhattan.pdf>
- HPD (NYC): https://hpdonline.hpdnyc.org/Hpdonline/provide_address.aspx

Dwelling Units by Subdistrict and Building

1) South East SoHo (6 Blocks: Baxter <-> Crosby / Canal <-> Grand)

Total Units: 150 du

[Total Block Lot Area: 237,333 SF]

- Block 207 (Baxter <-> Centre / Canal <-> Hester): 28 du [Block Lot Area: 38,467 SF]

200 Hester:	8 du	HCR:	HPD: Yes	8 du
202 Hester:	8 du	HCR: 2018	HPD: Yes	8 du Not Validly Registered
126 Baxter:	4 du	HCR: 2011; 2018	HPD: Yes	4 du
128 Baxter:	8 du	HCR: 2018	HPD: Yes	8 du
- Block 208 (Centre <-> Lafayette / Canal <-> Howard): 27 du [Block Lot Area: 36,157 SF]

129 Lafayette:	27 du	HPD: Yes	27 du
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- Block 209 (Partial, Lafayette <-> Crosby / Canal <-> Howard): 2 du [Block Lot Area: 40,726 SF]

261 Canal:	2 du	HPD: Yes	2 du
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- Block 233 (Lafayette <-> Crosby / Howard <-> Grand): 12 du [Block Lot Area: 42,135 SF]

133 Grand:	3 du	HCR: 2011; 2018	HPD: Yes	3 du
143 Grand:	3 du		HPD: Yes	3 du
145 Grand:	3 du			IMD in process
147 Grand:	6 du		HPD: Yes	7 du Not Validly Registered
- Block 234 (Centre <-> Lafayette / Howard <-> Grand): 18 du [Block Lot Area: 34,260 SF]

161 Grand:	18 du			
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- Block 235 (Baxter <-> Centre / Hester <-> Grand): 63 du [Block Lot Area: 45,588 SF]

208 Centre:	6 du	HCR: 2018	HPD: Yes	6 du
210 Centre:	5 du	HCR: 2011	HPD: Yes	5 du
216 Centre:	4 du			
218 Centre:	4 du	HCR: 2011; 2018		
220 Centre:	4 du			
165 Grand:	3 du		HPD: Yes	
136 Baxter:	12 du		HPD: Yes	12 du (Loft Law Completed)
148 Baxter:	5 du		HPD: Yes	4 du Not Validly Registered
150 Baxter:	20 du	HCR: 2011; 2018		



2) South West SoHo (7 Blocks: West Broadway <-> Sixth Avenue / Canal <-> Broome)

Total Units: 287 du

[Total Block Lot Area: 167,138 SF]

- Block 227 (2 blocks, West Broadway <-> Sixth Avenue / Canal <-> Grand) 29 du
[Block Lot Area: 69,986 SF]

381 Canal:	3 du	HPD: Yes	3 du	IMD in process
383 Canal:	3 du	HPD: Yes	3 du	
385 Canal:	4 du			
35 Grand:	10 du	HPD: Yes	10 du	
41 Grand:	2 du	HPD: Yes	2 du	
17 Thompson:	10 du	HPD: Yes	7 du	Loft Law
- Block 476 (2 blocks, West Broadway <-> Sixth Avenue / Grand <-> Watts) 258 du
[Block Lot Area: 97,152 SF]

110 Sixth:	30 du			
116 Sixth:	36 du	HPD: Yes	36 du	
519 Broome:	10 du	HPD: Yes	10 du	
521 Broome:	5 du	HPD: Yes	6 du	
525 Broome:	5 du	HPD: Yes	5 du	
23 Thompson:	28 du	HCR: 2018	HPD: Yes	28 du
26 Grand:	20 du	HCR: 2011	HPD: Yes	20 du
30 Grand:	20 du	HCR: 2011; 2018	HPD: Yes	20 du
36 Grand:	1 du		HPD: Yes	1 du
38 Grand:	16 du	HCR: 2011; 2018	HPD: Yes	20 du
42 Grand:		HCR: 2011	HPD: Yes	8 du
44 Grand:	16 du	HCR: 2011; 2018	HPD: Yes	8 du
46 Grand:	8 du	HCR: 2011; 2018	HPD: Yes	7 du
48 Grand:	5 du		HPD: Yes	4 du
50-52 Grand:		HCR: 2011	HPD: Yes	8 du
24 Thompson:	1 du		HPD: Yes	2 du
26 Thompson:	27 du	HCR: 2011; 2018	HPD: Yes	25 du
32 Thompson:	16 du	HCR: 2011	HPD: Yes	14 du
1 Watts:	4 du		HPD: Yes	2 du
350 W. B'way:	7 du			
362 W. B'way:	6 du		HPD: Yes	6 du

3) North East NoHo (Cooper Square <-> Lafayette / E. 4th <-> Astor Place)

Total Units: 165 du

[Total Block Lot Area: 37,110 SF]

- Block 544 (1 Block (partial); Cooper Square <-> Lafayette / E. 4th <-> Astor Place) 165 du
[Block Lot Area: 37,110 SF]

2 Cooper Sq:	133 du	HCR: 2011; 2018	HPD: Yes	133 du
32 Cooper Sq:	3 du	HCR: 2011; 2018	HPD: Yes	3 du
34 Cooper Sq:	3 du	HCR: 2011; 2018	HPD: Yes	5 du
56 Cooper Sq:	26 du		HPD: Yes	25 du

SoHo / NoHo TOTAL "Yellow Zone" UNITS AT RISK: 602 dwelling units AT RISK

* Comparison of NYS HCR Manhattan Rent Stabilized Building Lists for 2011 & 2018