

January 5th, 2016

Carl Weisbrod
Director, New York City Department of City Planning
Chairman, New York City Planning Commission
120 Broadway, 31st Floor
New York, New York 10271

Dear Chairman Weisbrod:

As builders, developers, architects, owners, and service providers of hundreds of thousands of affordable housing units in New York City, we commend Mayor de Blasio and the New York City Department of City Planning for the Zoning for Quality and Affordability (ZQA) and Mandatory Inclusionary Housing (MIH) proposals. ZQA and MIH reflect the bold vision of the de Blasio administration to tackle New York City's affordable housing crisis and will help us provide much needed affordable housing in communities throughout the City.

As was expressed by many speakers at the City Planning Commission hearing on December 16, 2015, the common sense zoning changes in ZQA will enable New York City's affordable housing development community to design affordable buildings and units that better serve the millions of New Yorkers who apply for and depend on New York City's subsidized housing programs. Both programs also provide means to ensure that new housing better fits the character of surrounding neighborhoods.

The zoning rules that dictate building envelopes have not kept pace with fire and building requirements, modern construction practices, or the City's priority to build affordable housing. As a result, we must often leave floor area ratio (FAR) unused, resulting in a loss of affordable units at a time when the City is experiencing a housing crisis. Modernizing building envelope requirements under ZQA will ensure that affordable housing developers can maximize the number of affordable units, as well as provide better designed units, buildings that better fit with neighborhood character, and more quality retail and community facility spaces.

Similarly, parking requirements present a major challenge for affordable housing, drawing subsidy and space away from the production of affordable units and detracting from uses that better serve the community such as ground floor retail, children's play areas, and green spaces. In some cases, parking requirements make affordable development infeasible altogether. A large number of parking spaces regularly go unused in affordable developments throughout the City, while we see huge waitlists for affordable units. Additionally, ZQA would help us serve the housing needs of New York City's seniors by providing the opportunity to take advantage of an

FAR bonus and eliminating parking requirements for senior developments, helping seniors stay in their communities.

In addition to ZQA, we support MIH as a tool to leverage market rate development for the production of affordable housing. In strong markets this enables affordable housing to be built without subsidies, allowing limited housing resources to be directed to neighborhoods where affordable housing would not be feasible without these subsidies. MIH will ensure that affordable housing requirements are included in all future rezonings in neighborhoods and sites throughout New York City. MIH will create housing that serves a range of incomes, providing much-needed affordable housing for New York City's residents and helping the City sustain economically diverse communities.

In summary, we strongly support the ZQA and MIH proposals, which will facilitate the creation of much needed affordable housing for New York City's residents.

Sincerely,

Abracadabra Painting Co., Inc
Alliant Capital
Alloy Development
Artimus Construction
Aufgang Architects
Avante Contracting Corp.
B&B Supportive
Best Development Group LLC
BFC Partners
Blue Sea Construction Co.
BOS Development
Breaking Ground
BRP Companies
Center Development Corporation
Community Access
Community Preservation Corporation
Cornell Pace, Inc.
Covington Realty Services, Inc.
Curtis + Ginsberg Architects PC
D&F Development Group
Dattner Architects
Diggs Construction, LLC
DP Group General Contractors/Developers
Dunn Development Corp.
Duvernay + Brooks LLC

ELH Management
Enterprise Community Partners
ERMarchitecture
Fordham Landing Associates
Forsyth Street
GF55 Partners
Gran Kriegel Associates Architects +
Planners
Habitat for Humanity NYC
Heritage Architecture & Planning
Housing Services, Inc.
IBEC Building Corporation
Innovative Property Management &
Development
KOW Building Consultants
L+M Development Partners
LandStar Title Agency
Loci Architecture
Mega Contracting Group
Monadnock Construction
Nations Roof LLC
Nelson Management Group. Ltd.
Nixon Peabody LLP
Omni New York LLC
Phipps Houses

POKO Partners LLC
Property Resources Corporation
RBC Capital Markets
Red Stone Equity Partners
RKTB Architects PC
Robert Sanborn Development
Rockabill Advisors
Samaritan Village
SEBCO Development INC
SelfHelp, Inc.
Shelter Rock Builders

SKA Marin
Slate Property Group
Smith & Henzy Advisory Group
SWBR Architects
The Arker Companies
The Briarwood Organization
The Hudson Companies Inc.
The Richman Group
West Side Federation for Senior and
Supportive Housing

CC: Alicia Glen, Deputy Mayor for Housing and Economic Development