

APPENDIX G: WRITTEN COMMENTS RECEIVED ON THE DEIS

A. Elected Officials



DEBORAH J. GLICK
Assemblymember 66th District
New York County

The Assembly State of New York

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Environmental Conservation
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Governmental Operations

Testimony of Assemblymember Deborah J. Glick Before the New York City Department of City Planning

Regarding City-Wide Zoning Text Amendments Zoning for Quality and Affordability and Mandatory Inclusionary Housing Calendar # 3 & 4 December 16, 2015

Thank you for the opportunity to testify before you today regarding the city-wide zoning text amendments known as Zoning for Quality and Affordability (ZQA) and Mandatory Inclusionary Housing (MIH). These two proposals stand to create city-wide sweeping changes that ignore the unique qualities found in individual communities. Rather, these proposals are a “one-size-fits-all” approach that would invalidate hard-won battles to protect historic neighborhoods and contextual districts. While the overall goal of creating more affordable housing, and senior affordable housing is laudable, the broad stroke of these amendments attempt to achieve these goals at the expense of existing communities. I do not support either the ZQA or MIH zoning text amendments in their current forms. I urge you to reject these proposals until changes outlined below, and by the individual community boards, are addressed.

Zoning for Quality and Affordability

According to presentations and written materials, it seems that the main goal of ZQA is to facilitate the development of more visually appealing buildings and create a uniform streetscape while allowing developers to maximize their available Floor Area Ratio (FAR). The proposal as it stands fails to protect existing specific neighborhood regulations that limit intrusive heights and bulk. These proposed changes affect neighborhoods regardless of Historic Districts and further increase heights across the board. While this would not change existing Landmark Preservation Law, it is known that the Landmark Preservation Commission has long indicated that it cannot evaluate a project based on height. As such, the increased height limits would directly impact any historic district and slowly erode the character of these, and future, districts. This not only undermines the unique nature of these areas, but erodes these neighborhoods as attractions for our growing film and tourist sectors.

While the population of New York City continues to grow, density will increase but should not be to the detriment of neighborhoods that have fought to preserve and protect the historic character of their neighborhoods. Furthermore, this increased density that would result from ZQA puts a further strain on public resources that are not addressed directly by this plan such as school seats, open green-space, and transportation. By definition, this text amendment would increase residential development, and density throughout the city. To encourage this increase without also updating the

City Environmental Quality Review formulas is negligent. The public infrastructure is already dilapidated, and most communities cannot withstand this increased density without significant reinforcement of public facilities.

Another provision of the ZQA proposal would increase height limits for new residential developments by 25 feet when developers opt into the 80/20 voluntary Inclusionary Housing Program. The argument for this height increase is that buildings are not able to use all available FAR in Contextual District Inclusionary Zones and therefore develop a building which is comprised of luxury housing, resulting in new construction that does not utilize the full FAR zoning allows. This is simply untrue, especially in neighborhoods like Greenwich Village, where long-fought battles to limit height and bulk in order to preserve historic neighborhoods, have occurred. Developers have been maxing out FAR by building large luxury developments without including affordable housing. Regardless of the changes in the ZQA proposal, the original problems in the Voluntary Inclusionary Housing program still persist, and until those issues are addressed buildings will continue to grow taller with scant affordable housing to justify them.

Additionally, ZQA would eliminate the Sliver Law, which protects mid-blocks in non-contextual zones from out of scale developments. Despite what other changes ZQA would make, such as protections to building envelope requirements, minimum first-floor height, setbacks, building articulation, and setting a maximum number of allowable floors, the potential for developers to use voluntary inclusionary housing with ZQA in order to construct larger buildings without regard to streetscape still persist. The Sliver law provides protections to blocks and should not be eliminated but rather strengthened.

Zoning districts were created to ensure that adequate light and air are provided in neighborhoods for residents, allowing for neighborhoods to be livable. Developers rarely need much encouragement to build taller and changing zoning to make it all that much easier seems unnecessary, unwise, and clearly runs counter to the public will. In the case of incentivizing the creation of senior affordable housing, the ZQA proposal, only 20 percent of allocated FAR can be devoted to senior housing in R-6 through R-10 districts with a substantial height increase. However, senior housing in ZQA is non-permanent and will become market rate again once the financial obligation used to create the senior housing expires. This results in permanently taller and bulkier buildings and also only temporary housing for seniors. Not only is this a bad for the individual seniors who might be priced out of a one-time affordable unit, it is bad policy to so significantly subsidize needed housing for such a short term gain.

ZQA would also reduce the legal minimum size for an apartment from 400 square feet to 300 square feet. Legalizing micro-unit apartments will encourage developers to build smaller spaces while still collecting astronomical rents. Just this month, the 250 square foot apartments touted by the previous Administration came onto the market for \$2,650-\$3,150. Furthermore, small spaces like this are bordering on tenement standards of livability. In fact, the minimums were put in place as an effort to prevent squalid living conditions so common in the past. Despite small interiors and close quarters it will be difficult to ensure only one individual occupies the space. Frequently, unscrupulous landlords or tenants using short-term rental outlets like Airbnb will use these spaces as if it was a hostel, hosting multiple individuals in a space that far exceeds their legal occupancy. This further jeopardizes our housing stock as units are lost to transient use. Furthermore, for older New Yorkers who must face a need for in home care, this micro size apartment could force them out of their home, even for a limited rehabilitation.

Existing tenants who occupy buildings are in jeopardy as well as vulnerable populations in microunit developments. My office frequently receives calls from residents calling about quality of life issues that are exacerbated by increased density and construction. If the goal of the text is to encourage construction of new residential units, then we must acknowledge some of the adverse impacts that typically accompany any new construction. Therefore, efforts to fight displacement and secure anti-harassment protections for existing and future rent regulated tenants are crucial.

Finally, an overarching critique of this plan echoed throughout New York City by Manhattan Community Boards and Manhattan Borough President Gale Brewer is that the uniformity of ZQA is inappropriate for our unique neighborhoods and communities. The Village, SoHo, and Tribeca have very different needs than Inwood or the Upper East Side. In neighborhoods where historic districts are frequently ignored in the face of new development or projects that seek to build higher despite the historical value of entire blocks, this aspect of the plan would cause certain neighborhoods to become vulnerable. Overall, changes to zoning through ZQA would largely hurt neighborhoods and existing protections in expensive, sought-after real estate markets. These are many of the same neighborhoods that have spent a generation strengthening community continuity and fighting to address overdevelopment.

Mandatory Inclusionary Housing

There is a serious affordable housing crisis throughout the City. I applaud the goals behind MIH in which all new construction would be required to include affordable units, allowing for income diversity across neighborhoods. In Manhattan, incomes vary drastically and change quickly. As a result, long-term residents are often priced out of their communities due to a volatile real estate market. However, due to the attempts to address this issue in one city-wide amendment, MIH limits affordability requirements too significantly. Lower and middle income individuals and families could still be priced out of certain neighborhoods based on geographic boundaries and Affordable Median Income (AMI) requirements.

Specifically, not including the mid-range AMI option in Manhattan south of West 110th Street and East 96th Street does not address the issue of affordability or creating long-term sustainable affordable housing. In areas like Greenwich Village, where incomes are already substantially higher than the city-wide median average, the proposed AMI bands do not reflect what is actually affordable, causing future developments using the MIH incentives to potentially offer rents that are more in line with market rate rents. Individual communities and neighborhoods should be able to decide what AMI bands make the most sense for their neighborhood.

Additionally, harassment and corruption problems already exist for tenants throughout the City. If MIH is enacted without adequate harassment protections to support tenants in their existing homes, residents are at risk of even greater illegal intrusions by their landlords. Enforcement from the City is frequently lacking and must be increased. Recently in Brooklyn, a firm redeveloped the Domino Sugar Factory into a multi-tower, 2,300 unit development under the voluntary inclusionary housing program and received a tax break and still managed to overcharge tenants. Investigations into these allegations show that the firm accepted tax breaks from the City and State, and then exceeded allowable rent increases on affordable tenants over a period of eight years. If this problem of

enforcement and policing the vast system of tax breaks and incentives occurred under the voluntary program, it is of great concern that this issue will be even more rampant if MIH is approved.

The MIH proposal contains a number of loopholes that fail to protect tenants and communities who stand to benefit from additional affordable housing in the long run. For example, MIH offers a *Payment-in-lieu Option and Housing Fund* (PIL) through which developers can make a contribution to a housing fund that can be used to fund affordable housing elsewhere if the proposed development is smaller than 12,500 square feet. MIH should lower the minimum threshold to be more in line with actual neighborhood square footages. Furthermore, if PIL funds are generated within one community, those funds for affordable housing should be required to be used within that community rather than going to another part of the City, or being used for some other purpose altogether. Additionally, I have concerns that MIH as written allows for the creation of a “poor building” which would replace the “poor door” that has long been opposed throughout communities. This provision needs to be reviewed and full integration of all levels of income need to be guaranteed within the developments, without any loopholes.

Finally, as it stands, the Board of Standards and Appeals (BSA) can grant developers exceptions under the guise of “hardships” or “unique conditions” that are not well defined under this plan. These definitions must be clarified and strengthened in order to improve community protections otherwise current problems will only be further exacerbated by the MIH plan further incentivizing unscrupulous developers to abuse the system. In fact, failing to strengthen these protections only add to the actual lack of affordable housing in New York City. Despite attempts to grow housing inventory in the City, problems under the existing zoning regulations persist and do not successfully address these concerns.

Conclusion

I thank the Department of City Planning for listening to the public, Community Boards, and many elected officials who are wary of major aspects of these two zoning text amendments. While the aims of increasing affordable housing and improving neighborhood quality in the city are laudable, these proposals do not address the problems effectively. Many communities stand ready to offer solutions within their districts to preserve and expand affordable housing. Neighborhoods and communities should be allowed to remain unique through strengthen locally defined standards. Thank you.



November 17, 2015

Carl Weisbrod, Chair
City Planning Commission
22 Reade Street
New York, NY 10007

OFFICE OF THE
CHAIRPERSON

DEC 2-2015
29033

**Re: Zoning for Quality and Affordability (ZQA) and Mandatory Inclusionary Housing (MIH)
Text Amendment**

Dear Chair Weisbrod:

We write in regard to the proposed citywide text amendments currently under public review known as Zoning for Quality and Affordability (ZQA) and Mandatory Inclusionary Housing (MIH). If approved, these text amendments have the ability to drastically reshape how housing, particularly affordable housing, is constructed in New York City. Therefore, while these text amendments mark an impressive amount of effort from the Department of City Planning (DCP) and the Department of Housing Preservation and Development (HPD) to address Mayor de Blasio's goal of creating or preserving 200,000 units of affordable housing in NYC, we need to ensure that they also make sense for our communities. These text amendments must include language, provisions and programs that address the needs and desires of all of our neighborhoods.

We previously wrote to you, in a letter dated March 25, 2015, to highlight our concerns with the ZQA text at scoping. At the time, the text reflected a desire to encourage housing construction of all kinds, without tying significant changes in the bulk rules to the true goal: construction of affordable housing. We raised our concerns regarding teardowns, across the board changes to our contextual districts and disregard for community or neighborhood character or uniqueness. Of significant concern at the time, in addition to the need to improve outreach and communication, was that the underlying zoning programs for creating affordable housing were flawed. Therefore, any additional incentives for development should be weighed against these concerns.

1) ZONING FOR QUALITY AND AFFORDABILITY

We are encouraged that two of the main points in our March letter were effectively addressed. We appreciate the administration's efforts in Manhattan to improve communication and transparency with the Community Boards on the intent and content of ZQA, including the advance availability of annotated zoning text to increase informal review opportunities. We were also encouraged to see improvements to the language of ZQA to reflect the principal goal of constructing affordable housing, a goal we adamantly support. The text also adopts many positive streetscape elements from the special enhanced commercial corridor district text, further addressing our concern regarding the quality of the new spaces we will see.

For the first time in the Zoning Resolution (other than the exceptions seen in a limited number of special districts today) the ZQA text will establish a cap on the number of floors in each zoning district to preserve “good” floor to ceiling heights. While we continue to have concerns regarding height increases, we acknowledge that by tying a five-foot height increase across all zoning districts to a defined minimum ground floor height along with a maximum number of stories for a district, the risk of teardowns as it relates to this piece of the text, would be minimal. We also appreciate that the scope of the text was constrained to its principal goal. The text clearly states that any significant increases in bulk and height will only be tied to the provision of affordable housing.

However, not all of our prior concerns were addressed, and now that the full text is available, specific new details or components raise additional concerns and questions.

- If the goal of the text is to encourage construction of new residential units, then we must acknowledge some of the adverse impacts that typically accompany any new construction in Manhattan. Therefore, stated plainly as a necessary element in achieving this goal must be efforts to **fight displacement and secure anti-harassment protections.**
- The provision of additional floor area for facilities that cater to our senior population and allow them to age in place is laudable. However, it is our understanding that the increase in floor area awarded to a developer is permanent and will add to the size of buildings. It is also our understanding that such increased building size will outlast the use-limiting financing that enables it to be used as senior housing. We need to hear more about how **additional permanent bulk that is created for non-purpose built residences such as independent living will be kept affordable in perpetuity.**
- The Sliver Law, which was established as a way to protect midblocks from out-of-scale development, will no longer apply under ZQA when affordable housing is part of a project. **We must protect the applicability of the Sliver Law as a tool to protect neighborhood context.**
- The new text re-organizes sections of the Zoning Resolution under which the Voluntary Inclusionary Housing program is detailed. However, it does not address any of our prior concerns with the program, detailed in a series of letters to DCP and HPD in 2014 and 2015. In addition, we now have similar concerns with the R10 program. If our communities are being asked to make concessions that affect context for affordable housing then the qualifying programs (Voluntary and R10), that may result in as much as 25% height increases must be improved so that they actually produce the affordable housing they should. **Changes in the Voluntary and R10 programs must be considered, and at a minimum a written commitment to do so with an expedited time frame is expected. Please see item 3 below for details on these changes.**
- Many of our communities are concerned about the impact new density may have on the local schools, public transportation and other infrastructure elements. We ask that your office and your respective sister agency reach out to individual community boards to investigate these concerns

and decide if capital improvements are needed to absorb any new residential capacity in these neighborhoods

2) MANDATORY INCLUSIONARY HOUSING PROGRAM

MIH appears to be a thoughtful program to drive the construction of affordable housing in Manhattan. The applicability to areas undergoing neighborhood studies that will result in an increase in residential density (upzoned areas) is clear and the need is justified in the context of our affordable housing crisis. We are pleased that in addition to applying to upzoned areas, MIH will apply to areas that are part of a special permit application where significant new housing will be built. This is a smart way to create additional affordable housing opportunities in Manhattan neighborhoods that see a disproportionate number of these land use actions. However, while the program goal is laudable, and we believe that all development in Manhattan should include affordable units, the text for this future use of MIH leaves a number of unanswered questions regarding:

- **Anti-harassment requirements:** We need protections for existing residents in areas targeted for construction with provisions similar to those in the Clinton Special District, to apply to all MIH areas.
- **On-Site, Separate Building:** We are concerned about language in MIH that allows for the housing of affordable units in a separate building on the same lot as it may replace the concept of “poor door” with “poor building.” The goal of affordable construction needs to be integrated buildings and diversity in our neighborhoods.
- **AMI options:** affordable housing produced under MIH must be affordable to those living in the community and surrounding communities. Currently, the affordability options that MIH makes available are too limited. They fall short of options that require tiers that address the need for apartments that are affordable to families representing the lowest and middle income tiers of families in our respective communities, and while based on averages, potentially will not result in the unit counts we need. Therefore, the options must be expanded to give Manhattan’s diverse communities a real choice in deciding what is affordable for their neighbors.
 - The workforce option should be available in all community districts regardless of whether a development will be eligible to qualify for 421-a benefits. If the goal is a universally applied program, it makes no sense to preclude an option for part of a borough.
 - In many neighborhoods where the current intent is to allow the workforce option, the units at 120% or 130% of AMI will be more expensive than market rents in the area.
 - The options with the deepest levels of affordability do not cover a range that is acceptable to neighborhoods with the greatest need for the deepest levels of

affordability. We proposed adding a fourth affordability option of 20% of units at 40% average AMI to cover the lowest AMI bands.

- **Applicability triggers:** the special permit option in MIH should be expanded, strengthening the threshold for the provision of affordable housing. The current qualifying condition (“substantial new residential density”) is not well defined and so is left open to interpretation by the City Planning Commission. The text should establish minimum thresholds for consideration, as is done elsewhere in the text.
- **Payment-in-lieu Option and Housing Fund:** The 12,500 square footage threshold required for the “payment in lieu of” (PIL) option that allows developers to pay into a local housing fund is too high and does not reflect accurate or realistic zoning calculations we have seen. The number should be lowered to 10,000 square feet and the text clarified to reflect, especially given the larger new construction unit sizes in our communities, that the threshold is the lesser of the square footage or unit count.
- The housing funds that are created by the PIL option are given a general framework in the text, and will need to be articulated by HPD. The zoning text should set a new standard for housing development monies by enshrining specific frameworks for governance, transparency, and strategy for use of the PIL funds, thus eliminating the possibility that future administrations may have different priorities and can unilaterally change the nature of such funds.
- Specifically, we believe that any money generated by a community should be spent in that community. Given that the funds could be used for preservation of units, there should be no sunset clause that allows those funds to be used elsewhere. Further, HPD should report on the strategy and usage of each fund to the relevant Community Board and elected officials. All funds generated through the PIL option must supplement, not replace, other city capital dollars for affordable housing.
- **Community process** - Referral of all MIH applications in the future should serve an important good government goal of ensuring transparency, compliance with the originally agreed upon AMI option, and an opportunity for communities to weigh in on current bedroom count needs as that may have changed since the adoption of an upzoning that applied the MIH program. However, the zoning text needs to reflect these explicit goals so that all parties have predictability and clarity regarding their roles. Part of that predictability includes how much time the Community Board has to review the documents, and an acknowledgement that those concerns will be taken under advisement and that HPD will not act before their review timeframe is completed. These are the concerns we raised with the Voluntary program referral requirement, and were told would be fixed here. **The text must be amended.**

Finally, the **Board of Standards and Appeals (BSA) loophole must be tightened** so that it will only be used in the presence of real hardship and not as the path of least resistance for developers who do not wish to build affordable housing. This could be achieved by adding specificity as to what might be considered “unique conditions” under which developers could seek BSA approval.

3) CHANGES TO CURRENT PROGRAMS

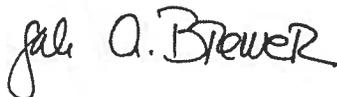
Neither ZQA nor MIH address the crucial fixes that must be made to affordable housing development programs that are already on the books. The **Voluntary Inclusionary Housing Program and the R10 Program** remain untouched. While MIH eliminates the **two-door loophole** for on-site housing that is included in the same building, two-door buildings or physically attached buildings with separate buildings systems may still be built under the old rules that still exist in neighborhoods across the borough.

Other fixes that were previously requested but not included in these text amendments concern:

- **Loose off-site provisions.**
- **Requiring that a greater percentage of square footage is set aside for affordable units** in strong markets where the extra bonus FAR value is lopsided in the developer's favor.
- **Double dipping** with 421-a. While this practice may continue, we should be getting additional units of affordable housing or a deeper level of affordability when this occurs.
- **Inconsistent community review requirements.** Community review is critical in ensuring transparency, affordability and adherence to agree upon AMI options. The text should establish these principles.

We thank you for your past consideration of our recommendations and we look forward to discussion of these concerns. We know that your commitment to improving the text will continue as we all strive to protect and increase affordable housing for all New Yorkers.

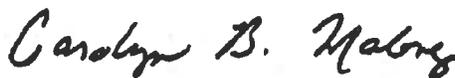
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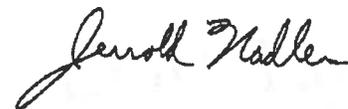
Gale A. Brewer



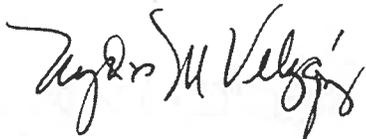
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13th Congressional District (NY)



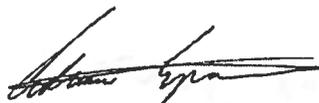
Congresswoman Carolyn Maloney
12th Congressional District (NY)



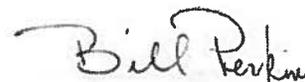
Congressman Jerrold Nadler
10th Congressional District (NY)



Congresswoman Nydia Velazquez
7th Congressional District (NY)



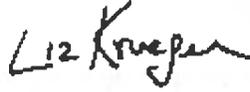
NYS Senator Adriano Espaillat
31st Senate District



NYS Senator Bill Perkins
30th Senate District



NYS Senator Jose Serrano
29th Senate District



NYS Senator Liz Krueger
28th Senate District



NYS Senator Brad Hoylman
27th Senate District



NYS Senator Daniel Squadron
26th Senate District



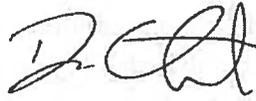
Assembly Member Rebecca Seawright
76th District



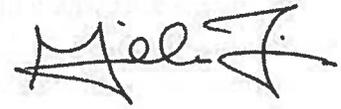
Assembly Member Dick Gottfried
75th District



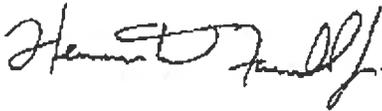
Assembly Member Brian Kavanagh
74th District



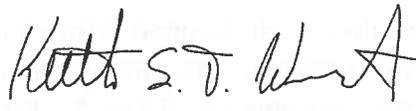
Assembly Member Dan Quart
73rd District



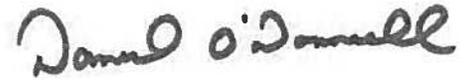
Assembly Member Guillermo Linares
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71st District



Assembly Member Keith Wright
70th District



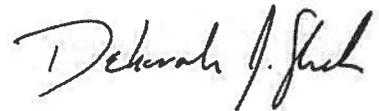
Assembly Member Daniel O'Donnell
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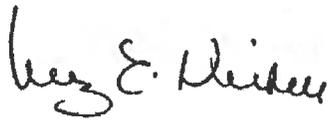
Assembly Member Robert Rodriguez
68th District



Assembly Member Linda Rosenthal
67th District



Assembly Member Deborah Glick
66th District



Council Member Inez Dickens
9th District



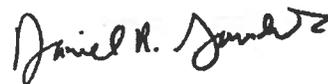
Council Member Mark Levine
7th District



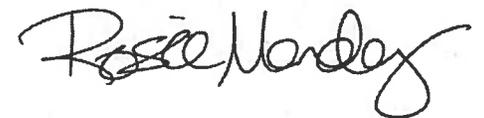
Council Member Helen Rosenthal
6th District



Council Member Ben Kallos
5th District



Council Member Daniel R. Garodnick
4th District



Council Member Rosie Mendez
2nd District



Council Member Corey Johnson
3rd District

- CC: Mayor Bill de Blasio
- Anthony Shorris, First Deputy Mayor
- Alicia Glen, Deputy Mayor for Housing and Economic Development
- Vicki Been, Commissioner, Department of Housing Preservation and Development
- Manhattan Community Board 1
- Manhattan Community Board 2
- Manhattan Community Board 3
- Manhattan Community Board 4
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- Manhattan Community Board 9
- Manhattan Community Board 10
- Manhattan Community Board 11
- Manhattan Community Board 12



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Gale A. Brewer, Borough President

**Testimony Before the City Planning Commission
Zoning for Quality and Affordability and Mandatory Inclusionary Housing
December 16, 2015**

Good morning, Chair Weisbrod and Commissioners. I am Gale A. Brewer, Manhattan Borough President, here to speak to the two citywide text amendments, ZQA and MIH. As you know, I issued a conditional “No” on ZQA and a conditional “Yes” on MIH. I will first share my concerns about ZQA and then address the work that needs to be done on MIH for my office to give full support.

Zoning for Quality and Affordability was discussed at three Manhattan Borough Board meetings, and I held a Borough-wide public hearing on November 16th. We also ran informational sessions for Community Board Chairs, Land Use and Housing Committee Chairs, affordable housing groups, and landmarks organizations. We worked hard to ensure that we heard the ideas and concerns of as many residents, experts, and organizations as possible.

At every step of the public review process, City Planning responded to concerns and made tweaks to the ZQA text proposal, and I believe a number of additional changes could also be made to address many of the issues raised during our lengthy outreach process. Still, however, concern would remain over the interplay between ZQA provisions and restrictions in recently enacted contextual districts. This concern may play out differently in each community board and is not so easily overcome.

Several other changes should be made:

- The text could be revised pretty easily to maintain the separation between wide and narrow streets so that the resulting heights of new construction are proportional to the width of the streets.
- The provision allowing residential use to encroach upon the historic doughnut of our rowhouse blocks should be removed.
- The additional provision to the Sliver Law—which weakens it by removing its applicability to the construction of certain residential and community facilities—should be eliminated.
- Provisions should be added to strengthen and clarify the language around the permanency of affordable senior housing, ensuring that permanent building size increases are accompanied by permanent use or affordability requirements.
- The CPC report can make clear that these changes will not unduly burden the LPC. In addition to alleviate another non-land use concern, the report should make clear that these changes do not elevate one construction method over another but rather to seek to put all on equal footing.

All of this I have communicated in discussions with the Department. I have also repeatedly communicated my concerns with the existing opt-in R10 and Voluntary Inclusionary Housing programs, which cover a good deal of Manhattan, and am gratified that a written commitment has finally been made to immediately begin studying and correcting current flaws within these programs.

These changes alone, however, are not enough to address the fundamental concern behind this text's framework: That there is a tension between the Department's decision to give developers greater incentive in the form of

additional height to opt into a voluntary affordable housing program, and neighborhood planning efforts over the past two decades, which have often sought to limit height. The text theoretically could be further refined to exclude wide streets that underwent recent rezonings from additional height increases; or it could carefully maintain existing underlying height rules in special districts that did not outline their own specific ones; it could even propose new districts with the new heights to be applied in the future as part of a carefully considered neighborhood plan. Without this degree of careful intervention, I am not convinced that the general changes will be enough to satisfy the concerns of individual community boards.

After much consideration, I have found that a significant number of proposed changes, especially those related to height, have the potential to negatively impact the built environment—and this is greatly troubling. I also remain concerned that, these changes will not bring us close enough to achieving the text amendment's goals—affordability and quality—and result in beneficial changes to Manhattan.

I believe some of these measures may undermine the work already undertaken by local residents to set their communities on the path to smart growth while protecting their unique neighborhood character. For example, one proposed change would adjust the maximum building envelopes in those Special Districts that do not already include any special FAR or building envelope rules to bring them in line with changes that ZQA would make to the Quality Housing option. There is one important fact that this change disregards, however: Just because a new height wasn't established does not mean height was not part of the original community discussion or consideration. For all these reasons, I cannot support ZQA at this time.

Then we have the **Mandatory Inclusionary Housing** Program, which, as a concept, I support. And this text, which the Department has already committed to me to improve on, could be the place to incorporate these future heights. Why? Because it will be applied on a neighborhood-by-neighborhood basis and at that time be given the full consideration and weight of the public process.

If the Mandatory Inclusionary Housing Program becomes law, there will be two types of inclusionary housing programs in New York City: Voluntary and Mandatory. The existing voluntary program offers developers a benefit—additional zoning density—if they provide affordable housing within a market-rate project (or within a certain distance of their project). They can get this in areas specifically zoned for the Voluntary Inclusionary Housing Program and in all R10 zones. These areas together make up about 20% of Manhattan.

Since becoming Borough President, I have been calling for two things:

1. Requiring affordable housing to be built whenever there is new residential development and especially when special permits allow the building of housing where it wouldn't otherwise be allowed.
2. Fixing the City's opt-in Voluntary Affordable Housing Programs where developers get bonuses for building affordable housing. This opt-in program covers significantly more territory in Manhattan than the contemplated neighborhood rezonings (such as East Harlem and Inwood) will cover.

Based on these two premises, I can support the MIH plan for the following reasons:

1. In addition to neighborhood rezonings, it would apply to all special-permit applications by private developers to add more than 10 residential units of housing to any area where this housing couldn't otherwise be built.
2. I have a commitment from the Chair of City Planning and the Commissioner of HPD to begin crafting changes to the Voluntary Affordable Housing programs that cover about 20% of Manhattan. These changes would result in developers being required to build more affordable housing when they take advantage of these programs and ensure that affordable housing is not stigmatizing by getting rid of what has been referred to as "poor doors."
3. I have received a commitment from the Chair of City Planning and the Commissioner of HPD to work with neighborhoods on strategies to apply the proposed MIH Program in a way to get more housing at the higher and lower ends of the AMI spectrum in neighborhoods that have a need for lower-income units and those that have a need for middle-income units, respectively. And I am confident that by working with the Commission and the Council we can translate this into more AMI options at both the lower and higher ends.

In addition, I have secured commitments that will go a long way to ensuring that the Affordable Housing Fund—which is funded by smaller projects—will be used in the community district where the money was generated, that the hardship waiver provisions for the program will be significantly tightened, and that we can work toward a higher percentage of affordable housing in all of our programs if an offsite option is used.

For these reasons, my recommendation is a conditional approval. However, there are significant conditions—much more than mere “tweaks”—that the program must adequately meet:

1. We need to ensure that we are not squandering any opportunities for additional affordable housing in Manhattan. If we are not going to require affordable housing with all new residential construction over a certain size, we need to be certain that the percentages of affordable housing in the mandatory inclusionary areas in Manhattan are as high as they can be under every option and that we capture as many special-permit applications as possible.
2. We need anti-displacement and harassment provisions or legal requirements to protect those in the neighborhood being rezoned.
3. As I stated, the Commission and Council need to broaden the AMI options at both the lower and higher ends; otherwise the program could fail to meet neighborhood needs at a significant cost to the stability of various communities.
4. The affordable housing must be as integrated as possible in terms of location and distribution within a building or development project, and any deviation from this goal should be discouraged by requirements of additional affordable housing.

The City Planning Commission should seriously consider the recommendations from the individual Community Boards, Borough Boards, and Borough Presidents. In the case of ZQA, you should decide whether specific, targeted changes will be sufficient to address enough of these issues to justify this text amendment moving forward in the public review process. If you decide these changes can't be

accomplished, it may be time to untangle and unburden MIH from ZQA, and time to narrow ZQA's focus and ensure that this narrowed focus is fine-tuned enough for the type of citywide impact it will have.

Queens Borough President Recommendation

APPLICATION: ULURP #160049 ZRY

COMMUNITY BOARD: CW

DOCKET DESCRIPTION

IN THE MATTER OF an application submitted by the Department of City Planning, pursuant to Section 200 of the NYC Charter, for a citywide zoning text amendment to promote affordable housing, including mandatory inclusionary housing, contextual height and set back changes, modifications to senior and supportive housing regulations and parking requirements.

PUBLIC HEARING

A Public Hearing was held in the Borough President's Conference Room at 120-55 Queens Boulevard on Thursday, November 12, 2015, at 10:30 A.M. pursuant to Section 82(5) of the New York City Charter and was duly advertised in the manner specified in Section 197-c (i) of the New York City Charter. The applicant made a presentation. There were two (2) speakers in favor and three (3) against.

CONSIDERATION

Subsequent to a review of the application and consideration of testimony received at the public meeting, the following issues and impacts have been identified:

- The Department of City Planning has filed this application known as Zoning for Quality and Affordable Housing (ZQA) to encourage better and more efficient buildings and to allow full utilization of zoning incentives to provide affordable housing;
- Adds or replaces definitions for types of senior housing and care facilities;
- Allows height increase to accommodate elevators in lower density districts not to exceed 4 or 6 stories for senior housing;
- Elimination of parking requirements for affordable or senior housing in transit zones;
- Increase ground floor heights to allow better residential or commercial spaces in medium and high density districts;
- Allows flexibility in design of buildings in relation to the sidewalk, garden areas, courtyards, windows, setbacks and lot coverage;
- The Department of City Planning has made presentations of the proposals at numerous meetings with all of the Queens Community Boards and the Queens Borough Board;
- Concerns have been raised at these meetings regarding several aspects of the ZQA proposal;
- Increased numbers of residents in denser taller buildings will place additional burdens on an already taxed infrastructure system. There are concerns that the schools, streets and transportation systems, sanitation and other services will not be able to handle them adequately
- Reduction or elimination of parking for affordable and senior housing within the newly defined "transit zone" (areas within one half of a mile from a subway station) on the basis that utilization rates are low for senior housing and that residents do not want to pay for the offstreet parking. The concerns raised are: Queens is not well served by mass transportation. The "transit zones" as identified already are the destination points for many who drive to those areas and park on the streets before getting on mass transit because there is nothing closer to their homes. Another concern is that the actual car ownership rates and patterns differ from the research based on registration data.;
- The application also includes proposals in medium and higher density districts that would affect how buildings relate to each other in regards to courtyards, setbacks from the sidewalk and location of garden areas. There are concerns that these design changes could impact the overall visual continuity of an area.;
- Community Board 1 approved this application with conditions by a vote of 29-4-0 at a public meeting held on November 10, 2015. The conditions were as follows: parking must be provided for any affordable housing built, exclusion of some affordable housing floor area from countable floor area and that incentives should be given to produce bigger units to promote a better quality of life, revise Quality Housing Program rules that restricts provision of parking;
- Community Board 2 disapproved this application with conditions by a vote of 28-2-3 at a public meeting held on November 5, 2015. The conditions were as follows: parking should be provided for affordable housing, except for ground floors increased building heights should not be allowed, irregularly shaped lots should not be developed, and there should not be a Board of Standards and Appeals hardship process;

- o Community Board 3 approved this application by a vote of 16-11-0 at a public meeting held on November 12, 2015;
- o Community Board 4 disapproved this application by a vote of 22-3-3 at a public meeting held on November 10, 2015;
- o Community Board 5 disapproved this application by a vote of 37-1-1 at a public meeting held on November 4, 2105;
- o Community Board 6 disapproved this application by a vote of 22-2-3 at a public meeting held on November 12, 2015;
- o Community Board 7 disapproved this application by a vote of 35-1-1 at a public meeting held on November 9, 2015;
- o Community Board 8 disapproved this application by a vote of 32-0-0 at a public meeting held on November 12, 2015;
- o Community Board 9 disapproved this application by a vote of 33-0-1 at a public meeting held on November 10, 2015;
- o Community Board 10 waived their hearing on this application;
- o Community Board 11 disapproved this application by a vote of 24-1-2 at a public meeting held on October 5, 2015;
- o Community Board 12 disapproved this application by a vote of 29-0-0 at a public meeting held on October 21, 2015;
- o Community Board 13 disapproved this application by a vote of 32-7-0 at a public meeting held on October 26, 2015;
- o Community Board 14 disapproved this application by a vote of 32-0-0 at a public meeting held on November 10, 2015
- o The Queens Borough Board approved a motion to disapprove this application by a vote of 12-2-6 at a public meeting held on November 16, 2015. The 6 abstentions cast were for cause.

RECOMMENDATION

Based on the above consideration, I hereby recommend disapproval of this application in its present form for the following reasons:

- Over forty neighborhoods in Queens were contextually rezoned over the last decade or so. Many of these neighborhoods were rezoned during my tenure as the Chair of the NYC Council Land Use Committee. Each of these rezonings were done with extensive neighborhood participation that was solicited by the Department of City Planning to assure that each proposal addressed the most pressing issues and were sensitive to the density and heights of those neighborhoods. Some of the ZQA proposals would undo the carefully sculpted rezonings that were the result of a collaborative effort to protect our neighborhoods from overdevelopment;
- Many of the neighborhoods were rezoned with new contextual tools that helped to encourage the best of how the buildings in each area related to each other in terms of the distances from the sidewalks, depth of yards and other attributes that give a neighborhood a built character. Some of the proposed text may alter some of the features that contribute to an areas appeal;
- There should be an option where incentives are provided to get more affordable housing built within the existing neighborhood context, particularly in the lower and medium density districts, without altering the built character of those areas;
- Parking should be provided in any new affordable or senior affordable housing. Queens residents rely on their cars for many aspects of their lives. Subways are only available in one third of the borough. Without reliable mass transit, cars are necessary to get to their jobs, doctor's appointments, shopping or bringing their children to school.;
- There is also concern that affordable independent senior housing not built as a Mandatory Inclusionary Housing development with termed financing would not be permanently affordable. This oversight would be contrary to the overall goal of generating permanent affordable housing particularly for seniors as a group who are severely affected;
- There should not be a new special permit that would allow the Board of Standards and Appeals to modify or reduce bulk requirements for a development with at least 50% of floor area for affordable housing or long term care on an irregular lot. There is already a Board of Standards and Appeals variance procedure to address this type of hardship for development.



 PRESIDENT, BOROUGH OF QUEENS



 DATE

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OF THE NEW YORK CITY COUNCIL

**Council Woman Rosie Mendez
On the City-Wide Application of Zoning for Quality and Affordability and Mandatory
Inclusionary Housing
City Planning Commission Testimony**

December 16, 2015

Thank you, Chair Weisbrod and Members of the Commission, for the opportunity to testify before you today. I applaud the goals of administration in attempting to create and preserve affordable housing for New Yorkers. While I look forward to seeing New Yorkers provided with the opportunity to remain in this city, I do have some concerns about the administration's proposal that I would like to make you aware of; I, as always, look forward to working with the Department of Housing Preservation and Development as well as the Department of City Planning as these proposals move forward.

Zoning for Quality and Affordability (ZQA)

In the early stages of the proposal it was clear that ZQA would negatively impact a large portion of my district. Only a few years ago, we passed the Lower East Side/East Village rezoning that created growth areas and put in place protections that would prevent out of context development. Those protections were threatened by ZQA by upzoning the R7-2, R7A and R8B areas. Since then, we have been able to successfully prevent the architectural context of the community from changing drastically and protecting a human scaled built environment. ZQA might very well have threatened the low-rise character of the East Village, but modifications made early on to ZQA have removed that threat. I am thankful for those changes.

Housing for senior citizens is desperately needed in my district and throughout the city. However, any units created must be **permanently affordable**. Many seniors live on fixed incomes which makes it difficult to make ends meet. Should this proposal move forward to adoption it **must** ensure that any new units created through this text amendment will be permanently affordable. We cannot provide permanent building height increases for buildings that will provide affordable housing for a designated number of years for either senior citizens and/or others. There are other aspects of this proposal that concern me and pose potential dangers to my district, and, indeed, to the rest of the City.

As mentioned in the Manhattan Borough Board Resolution regarding this proposal, the text will eliminate protections put in place by the Sliver Law. During the past 10 years that I've served as the Councilwoman for District 2, I and others have successfully used the Sliver Law to stop illegal rooftop additions and additional stories that would have created pencil shaped buildings. These proposed pencil shaped buildings would have been out of scale eyesores in our low rise community and would have been out of character with the existing walk up tenement buildings that comprises a large section of the Lower East Side and East Village. Therefore, I wholeheartedly agree with the Manhattan Borough President Gale Brewer when she states that you cannot eliminate rules in conflict unless there are tighter controls in place.

Of great concern to me is that we don't run afoul of the law in an attempt to pack as many apartments as possible into development or existing sites. These very small units will create cell-like conditions for Seniors Citizens and potentially result in the loss of livability of those units forcing them to remain vacant, only to later be combined by owners to make financial windfalls.

In addition, I am concerned to put in place a proposal that proscribes particular building practices. As technology changes, new materials are developed, and new building practices are adopted, the Zoning Resolution must remain flexible. We must mandate that the highest quality materials are used, that the latest and best practices are employed, and that we do not inadvertently disallow new ways of building. We should find ways to lower construction costs but raise quality so that we have the financing available to build new units that are permanently affordable.

Another concern I have regarding these proposals were raised by the Community Boards that overlap with my District. The 2nd Council District contains Community Board 2, 3, 5, and 6. These boards, indeed all of Manhattan's Community Boards, have voted to recommend denial of the administration's proposal. These denials are conditioned on the administration's ability to address and resolve concerns raised by the respective boards. While the concerns vary from board to board, I urge the administration to take a moment to consider that perhaps ZQA must depart from the one-size-fits all approach and to work with each and every community board to tailor this proposal to the needs of our different communities and their different building typologies. Below you will find an important issue raised by the community boards in my district that bears repeating:

- Community Board 2 fears that ZQA may spur development and result in new out of context development. We are beginning to see such a trend now. In fact, all the boards I represent believe that one-size-fits-all approach will not prove beneficial;
- Community Board 3 states that if these proposals are to spur development of affordable units the mandates for percentages of AMI in MIH should somehow be incorporated into ZQA. In addition, I urge the commission to modify ZQA so that all units created through the use of unused FAR be for permanently affordable units;
- Community Board 5 and I urge the commission to institute modifications that would protect the architectural character of buildings in historic districts; and
- Community Board 6 and I urge that any zoning lot mergers include a height limit.

My final concern is that sites that will not take advantage of any available air rights they might sell those air rights rather than build to the full potential building envelope and create new units. Property owner preference for profits right away versus potential profits down the road will not result in new, needed residential units for senior citizens.

Mandatory Inclusionary Housing (MIH)

The City's need for apartments affordable to extremely low-, low-, and moderate incomes families is greater than ever before. With the pace of luxury development grossly outpacing the development of affordable units in the City, I support the Mayor's goal of

mandating the creation of affordable housing in rezoned areas of the City. While I would prefer to mandate affordable housing in all residential development, I understand that in all cases that might not be economically feasible and that the City might run the risk of subjecting itself to the Takings Clause of the U.S. Constitution. However, I ask the Commission to consider including MIH provisions for all residential conversions, as well as any application for new multi-family development.

As the sole Council Member who did not abstain, but voted on the Manhattan Borough Board Resolution, I would like to reiterate some of the concerns within it:

1) I would strongly urge the Commission to include anti-harassment and anti-eviction certifications to the proposals as was instituted in the Clinton/Hell's Kitchen Special District. These protections have proved successful and, perhaps with minor changes, can help to protect New Yorkers in other communities and allow them to remain in the communities they helped to make great. As noted in Manhattan Borough President Brewer's recommendations, rezonings increase speculation which in turn leads to the creation of soft sites which might otherwise have not been considered a soft site. My elected colleagues and I have recently reached out to you about addressing this very issue in the University Place corridor. As noted in that letter, Manhattan's real estate market is so speculative and produces such incredible financial windfalls that greatly skew normal market realities. We must use such markets to create affordable units. I feel that this is a zero sum game we are facing and any unit we can achieve is one less unit of market rate housing which we already have an overabundance of in this City, and certainly this borough.

2) The BSA Special Permit should be eliminated completely. There is no financial hardship involved here and any procedure created to allow developers to wiggle out of their civic duty to this City will be used to deprive of us the housing we desperately need.

3) I urge consideration of eliminating the offsite provision. If public subsidies are used to make projects financially feasible then they must also include housing options and opportunities for people already living in the community in which they build. Further, I strongly recommend eliminating the separate but equal treatment of affordable housing with poor-door and poor-building projects. If such projects must be built then it must be

demonstrated to HPD, the Community Board, and the Council why these buildings must be separate. Additionally, CPC should modify this text amendment so that the “Workforce” option applies to more community boards. Community Board 1, 3, 4, 6, and 9-12 all have populations of families of limited means who could be eligible for the housing that would be created under this option.

4) Income qualifications should be tied to the AMI’s of the least economically stable in communities in which development happens. The way in which the federal government calculates AMI is skewed by other jurisdictions in the region. Also, flexibility must be built into the MIH process which allows for greater numbers of units and deeper ranges of affordability to be negotiated.

As with ZQA, the community boards in my districts, in their consideration of this application enumerated concerns with the proposal. I urge the Commission in its consideration of the comments they will hear today to consider some of the points from Community Board 2, 3, 5, and 6.

- In Community Board 2 there is a concern with the Voluntary Inclusionary Housing (VIH) program and the way it has been applied in their catchment area. Assurances that were given on the creation of new units of affordable housing have not resulted in the creation of new units. VIH should be amended and should be folded in MIH. In addition, Board 2 (as with all the boards in Manhattan) urges that the “Workforce” option include a broader range of AMI levels. I would like to echo this comment and urge the Commission to include different income options so that more Boards are able to take advantage of the program.
- Community Board 3 has seen numerous rezoning proposals in the last few years. Projects like Essex Crossing have shown that developers are able to achieve profitable projects while still including a significant amount of affordability. Half the units that will be built at this project will be affordable to a diverse range of incomes.
- Community Board 5, in its resolution about MIH notes that BAE’s financial feasibility analysis (Table 21 and 22) notes that “Very Strong” markets can support a 50% set aside for affordable housing. I have seen these rates achieved in

other projects, specifically Essex Crossing, as well as others. Another model, 50/30/20, is achievable as well. As the Commission considers the comments made at this hearing and any modifications it may institute, I would urge you to find ways to build in the flexibility for different communities to achieve as high a rate of affordability for different income ranges as possible.

- Community Board 6, in this board's consideration of MIH noted that should a developer choose to build the affordability component off-site, the units should remain in the district in which the generating site was built. They have also called on the Commission to match the Voluntary Inclusionary Housing provisions to the new Mandatory Inclusionary Housing Provisions. In addition, a portion of said housing—whether on-site or off-site—should be reserved for veterans, or those transitioning out of homelessness.

One suggestion for the Mandatory Inclusionary Housing proposal would be to include a provision in which developers who purchase air rights through either the transfer of air rights through the Voluntary Inclusionary Housing program or from a newly regulated building which sells those air rights that all parties must notify the local Community Board and Council Member. Another suggestion would be for projects that obtain 421a funding or other public subsidies that they be required to produce additional, deeper level of affordability either with units on-site, off-site, and at lower AMI levels.

I want to thank all of the Community Boards in my district for their diligence and thoughtful comments. As some of the groups who I work most closely with on projects, whose guidance creates the roadmaps for I and my colleagues their input will greatly improve the success of these two programs.

It is my understanding that several commitments have already been made to my Borough President. I look forward to seeing these commitments reflected in the proposals that come to the City Council in its consideration of MIH and ZQA. Thank you, Chairman Weisbrod and Commissioners, for the opportunity to make my comments.



Ruben Diaz Jr.
Bronx Borough President

John DeSio
Communications Director

FOR PLANNING PURPOSES ONLY

John DeSio (917) 209-4974

December 16, 2015

**TESTIMONY OF BRONX BOROUGH PRESIDENT RUBEN DIAZ JR.
BEFORE THE CITY PLANNING COMMISSION**

RE: Mandatory Inclusionary Housing & Zoning for Quality and Affordability

Good morning.

I am here today to testify in opposition to the pair of zoning text amendments that have been put forward by this administration and the Department of City Planning, known together as “Zoning for Quality and Affordability” (ZQA) and “Mandatory Inclusionary Housing” (MIH).

These text amendments pose an abundance of concerns and questions by my office, the community boards, advocacy groups, elected officials and others from all points on the spectrum of the development and public policy community. These concerns were underlined at the recent meeting of the Bronx Borough Board, where they were unanimously rejected for a wide variety of reasons.

The submission of over 500 pages of text amendments at the same time is an unreasonable burden on most community boards to adequately review and evaluate their local neighborhood impact. These text amendments will govern land use development for our city for decades to come and should not be adopted in such a short period of time. Something so profound as the future development of this city cannot be rushed.

Achieving our city’s affordable housing goals cannot be accomplished in a vacuum. Our goal as a city should not be just to achieve a goal of 200,000 units, but to meet the individual needs of each and every community in this city. Allowing just 60 days for our community boards to weigh in on these proposals is disrespectful to the boards, their members and the neighborhoods they serve, and goes against the spirit of progressive, inclusionary and transparent government.

Despite the impact these combined proposals will have on density, there has been no serious discussion of the social and physical infrastructure necessary to manage the development for which this zoning plan allows.

Are there enough school seats for the children accompanying their parents as they move into new affordable units? What will be the impact on transportation in these communities? Will additional services be provided for seniors? Will new green and public spaces be provided for new residents? What kind of jobs will be created? How can we totally eliminate parking requirements? Will neighborhood residents even be able to get these new apartments?

These questions, and many others, have gone asked and unanswered.

Additionally, the proposal as it stands would not fully realize the goal of truly mixed-income communities. For example, a mix of specific income levels covering a broad range from very low to moderate-incomes within market rate developments should be considered. This range, rather than income averages, would create the true mixed-income neighborhoods that this proposal hopes to achieve.

The “neighborhood-by-neighborhood” approach to planning has been very successful in The Bronx, and these text amendments undermine that success. The borough has adopted no less than 14 rezonings since 2009, yet these proposals will reshape the zoning of this city with one broad brush stroke.

One size does not fit all. Local planning efforts reinforce the principles of inclusion and transparency, and can also mitigate displacement and preserve neighborhoods. These principles have been successful in previous rezonings, and they must be respected moving forward.

This administration has said that MIH and ZQA are the only way to mitigate the problems of displacement that can come with gentrification in New York City. This is simply not the case. While affordable housing is key, these amendments as they stand are not the way to accomplish affordable housing for all New Yorkers. There are multiple issues with the proposed amendments. We need to find a way to ensure that Bronx residents’ needs and all New Yorkers’ needs are met by new zoning, and this proposal does not achieve those ends.

While it has been said that changes will be made to these text amendments in light of community concerns raised regarding their implementation, we have not seen those changes yet. As currently written, I cannot support these zoning text amendments—Mandatory Inclusionary Housing Program and Zoning for Quality and Affordability—and I strongly recommend that the City Planning Commission vote to defeat these proposals.

Thank you.

THE SENATE
STATE OF NEW YORK



TONY AVELLA
SENATOR, 11TH DISTRICT

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FOR POLICY & ADMINISTRATION OF THE
INDEPENDENT DEMOCRATIC CONFERENCE

CHAIR

CHILDREN & FAMILIES

TASK FORCE ON THE
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**OFFICE OF THE
CHAIRPERSON**

JAN 05 2010

29287

December 16, 2015

BY FAX AND MAIL

Hon. Carl Weisbrod
Chairman
City Planning Commission
22 Reade Street
New York, NY 10007

Re: City Planning Nos.: N 160051 ZRY and N 160049 ZRY
“Zoning for Quality and Affordability” and “Mandatory Inclusionary Zoning”
text amendments.

Dear Chairman Weisbrod:

Since the introduction of the Zoning for Quality and Affordability (ZQA) and Mandatory Inclusionary Housing (MIH) proposals this year, the Department of City Planning has promoted them as a response and solution to the crisis of housing affordability in New York City. I have responded to both items in my attached formal testimony for this hearing - I am opposed to both in their current form - and urge the City Planning Commission to withdraw these proposals from the ULURP process immediately. Both ZQA and MIH need to be completely rethought, as has been repeatedly stated from over 90% of the Community Boards citywide as well as 4 out of 5 Borough Presidents and all of the Borough Boards to date.

As the former Chair of the Subcommittee on Zoning and Franchises from January 1st, 2002 until December 31st, 2009, I am greatly troubled by the attempt to reverse many zoning reforms which communities fought extremely hard for. This is particularly true for ZQA, which will undermine the protections which were passed for numerous neighborhoods contextually zoned during my tenure, as well as specific rollbacks of reforms which I personally helped to author; many of those changes will contribute to more density and height as-of-right and have nothing to do with affordable housing whatsoever. As for MIH, it is clear that those in the most need of affordable housing - families making less than \$30,000 per year - will essentially be locked out of new so-called "affordable" units as their neighborhoods quickly gentrify from numerous market rate buildings being constructed.



Additionally, the process that has occurred to date surrounding the public hearings and information disseminated by the Department of City Planning has been troubling. At public hearings, representatives from the Department of City Planning have routinely given only partial presentations of these very complex proposals to the Community Board members as well as the public; at many hearings in more suburban parts of the city, those same representatives told the Community Board members that "they should vote in favor of ZQA and MIH because it didn't really affect them anyway," a statement not true in any way, shape or form. In more densely populated Community Boards, those members - and the public - were told that they had to expect more population, more units, more development, and at higher densities, without question. When Community Board members or members of the public disagreed or brought up questions or concerns to the representatives from City Planning and other agencies present, they were routinely disrespectful, sometimes egregiously so, often paternalistically talking over the public and, at times, were caught lying to the audience! This is disgraceful behavior from an administration attempting to sell major controversial changes to the zoning code to a public already wary of additional large-scale development.

Rather than helping to solve affordability through a novel approach of community-based planning, these proposals are a declaration of war against neighborhood character and the retention of existing affordable units in the city. Mayor DeBlasio stated in February that we "have a duty to protect and preserve the culture and character of our neighborhoods, and we will do so" when he was referring to new affordable housing proposals that would come from his administration. This citywide zoning proposal is clearly in absolute opposition to the Mayor's rhetoric. If it is adopted as is, it will quickly undo decades of careful progress in protecting neighborhoods around New York City from as-of-right overdevelopment.

Sincerely,



Tony Avella
State Senator
11th Senatorial District

THE SENATE
STATE OF NEW YORK



TONY AVELLA
SENATOR, 11TH DISTRICT

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Statement

New York State Senator Tony Avella

**New York City Planning Commission
Public Hearing on
Zoning for Quality and Affordability and
Mandatory Inclusionary Zoning Text Amendments**

December 16, 2015

I submit this testimony in response to the Department of City Planning's proposed "Zoning for Quality and Affordability" and "Mandatory Inclusionary Zoning" text amendments.

Zoning for Quality and Affordability

The Department of City Planning (DCP) has spent the past year working on a citywide zoning proposal which they purport will respond to the lack of affordable and senior housing in New York City. This proposal, released with little fanfare or publicity one month ago, will have a public scoping hearing on Wednesday, March 25th, 2016. After this hearing, the Department of City Planning is supposed to digest the responses from the public and rework the scope before the final submission triggers a ULURP action.

Throughout the document, several terms are used repeatedly: *modernize, optimize, enhance, best practices, flexibility* and *reduction/elimination of obstacles*. In planner-speak, all of these words mean to do away with or eviscerate the very things that civic organizations, community boards and other groups have fought for - sometimes for decades - to protect our neighborhoods from out-of-scale and inappropriate development.

This remarkable, Real Estate Board of New York (REBNY)-driven document is a total violation of the expectations of rational and reasonable development in contextual neighborhoods throughout New York City. Where the term "balance" has often been used to describe the give and take of development practices throughout New York City, the proposed changes to development practices in the Draft Scope of Work can only be described as a giveaway to developers under the guise of promoting increased affordable and senior housing. In fact, many of the proposed changes have nothing to do with either and are included to help developers realize more buildable floor area in their projects. In other words, *there is no "balance" in this proposal whatsoever.*

Throughout the document, the DCP has stated that the "With-Action" - or approved - scenario will have the same effect as a "No-Action" - or not approved - scenario, because "the increment would be small and spread throughout the city." This is a disingenuous statement; if the zoning regulations are changed throughout the city in multiple zones in order to facilitate increased development, then, without question, increased development will occur throughout New York City.

Across the board, if these proposed changes are adopted. They will create buildings that will be higher, bulkier and have more units as-of-right - and even more so for affordable and senior housing - across the city.

The key areas that are being discussed are *senior housing and elderly care facilities; changes to building heights, setbacks and other regulations; and affordable housing.* A brief summary and analysis is included on the following pages.

1. Senior Housing and Care Facilities

According to this document, the approach to increasing senior housing is two-fold; allow for bigger and bulkier buildings with an increased number of dwelling units and reduced or total elimination of parking requirements. Additionally, the Department of City Planning is proposing to eliminate special permits and other certificates which are needed to operate elderly care and nursing home facilities and, in a new twist, essentially allow the merging of housing and care facilities. Other changes include:

Increasing the base and overall height of buildings from 10' to 40' on top of the already proposed as-of-right increases for all R6-R10 contextual zone buildings of 5' to 15'.

Creating a new lower-density bulk envelope for senior housing and care facilities in R3-R5 zones. The buildings would be able to be 45' to 65' in height (rather than the 35' to 40' height limits which exist today) and would not be required to get additional CPC authorization (most of the time).

Increasing the FAR from 5.0 to 6.0 in future R7X and R7-3 Inclusionary Housing Designated Areas. This would also apply to senior housing and care facilities in both existing and future R7X and R7-3 zones.

Changes to Parking Requirements:

Under the proposed actions, off-street parking requirements would be severely changed in most residential districts:

Within the Transit Zone, all parking requirements for independent housing for seniors in all multifamily zoning districts would be eliminated.

Within the Transit Zone, all existing non-profit residences for the elderly (or simply housing units dedicated to seniors) would be able to eliminate all presently required parking.

Senior housing of any kind within R6-R10 zones would have no parking requirements, near or far from transit.

Senior housing of any kind within R3-2-R5D zones would lower parking requirements to 10% instead of 85%-100% of units as is currently required.

R6-R10 zones which presently have senior housing would retroactively be able to remove parking requirements through discretionary action by DCP/DOB. This would free up "surface parking lots" which are currently required for senior housing to be eligible for new development.

2. Changes to Building Height, Setbacks and other Regulations

Under the proposed actions, many contextual zoning controls created in the early 1990s will be reduced significantly or even eliminated entirely; in other cases, such as protective controls in the city-wide Yards Text Amendments which were passed in 2007, these will be eviscerated to the point of being meaningless. Some of the proposed as-of-right changes to non-inclusionary or senior housing (meaning, regular as-of-right development) include:

Increasing the maximum streetwall and maximum overall height of buildings within most contextual zoning districts anywhere from 5' to 15' as-of-right. While some of this height is only to be used for the ground floor to create 13' floor-to-ceiling heights, in other zones it will be at least one additional floor per building.

Reducing setback requirements in the front yard/streetwall and eliminating the rear yard setback requirements altogether.

Allowing between 90% and 100% lot coverage for corner buildings for Quality Housing developments and many Special Districts.

Allowing the 1983 "Sliver Law" to be rescinded, allowing towers up to 235' tall.

Increasing the maximum height of transition areas (the 25' adjacent to a lower density area, such as an R2, R4A or R6B zone for example) from the adjacent zone maximum base height (between 24' and 50' depending on the zone, but typically 35' to 40') to 65' to 75' thus increasing the height and floor area at the expense of light, air and scale for the adjacent lower-density property.

Allowing for intrusions into the streetwall setbacks for "better design flexibility" for between 30-50% of the front facade between 1 and 3 feet in depth.

Decreasing line-up provisions which, along with maximum streetwall and overall height limits, are one of the key controls in contextual zones. The line-up would decrease from 15' to 10', allowing for buildings to jut out into the streetscape. Additionally, buildings would only have to line up to the adjacent buildings on either side, not within 150'.

Significantly decreasing the width to depth ratio for court provisions, which would have the effect of creating smaller amounts of open space within a building.

Simplifying retail regulations for ground floor spaces by making the retail spaces significantly shallower than current rules permit.

Allowing community facility uses to be located on the same floor as residential uses, which are currently prohibited.

Changing the formulas of minimum square footage required for a legal apartment in order to create "micro-units" of 275 square feet.

Encouraging elevated ground floor residences with ramps in the residential lobby.

Rewriting the provisions for shallow lots, which currently require a 30' rear yard if the property is at least 70' deep, with a 1' to 1' ratio for each foot that it is shallower; the new provision would remove 6" needed for a rear yard for every foot less than 95', resulting in much more building and less open space on a shallow lot. This rule would affect all shallow lots, regardless of when they were created after 1961.

Significant reduction of required minimum distances between windows and buildings.

3. Affordable Housing

According to this document, the approach to increasing affordable housing is similar to senior housing; allow for bigger and bulkier buildings with an increased number of dwelling units and reduced or total elimination of parking requirements. This includes:

Increasing the base and overall height of buildings from 10' to 40' on top of the already proposed as-of-right increases for all R6-R10 contextual zone buildings of 5' to 15'.

Allowing accessory uses, such as laundry rooms, recreation space, trash rooms and mechanicals to be built in the rear yards of buildings up to 15' in height, which are normally required to left open for light, air and space between buildings.

Encouraging taller buildings on narrow lots in R7-R10 zones by removing the "sliver law" provisions which curtail these out-of-scale buildings, even at off-site affordable housing locations.

Creating a new, very tall non-contextual building envelope in R6-R10 zones - similar to a new "Special District" - to promote high-density affordable housing along rail lines and highways. Maximum heights would range from 115 to 355 feet.

Increasing the FAR from 5.0 to 6.0 in future R7X and R7-3 Inclusionary Housing Designated Areas.

Changes to Parking Requirements:

Under the proposed actions, off-street parking requirements would be severely reduced are eliminated in most residential districts:

Within the "Transit Zone," all qualifying affordable housing would be able to eliminate any parking requirements, regardless of the residential zone in question. Developments that have some affordable units would also be able to reduce and possibly eliminate parking requirements.

R6-R10 zones would have no parking requirements, near or far from transit.

R3-2-R5D zones would lower parking requirements to 10% instead of 85%-100% of units.

All future buildings with a mix of affordable and non-affordable units would be eligible to have reduced parking requirements on a case-by-case basis.

R6-R10 zones which currently have affordable housing within the "Transit Zone" would be eligible to retroactively remove parking requirements on a case-by-case basis through discretionary action by DCP/DOB. This would free up "surface parking lots" which are currently required for senior housing to be eligible for new development.

Mandatory Inclusionary Housing

Mandatory Inclusionary Housing (MIH) will not make the current system of voluntary affordable housing mandatory. Due to the fact that it will only be applied to areas that will be rezoned in the future, it will dramatically increase market-rate development density and height in the process.

Many of the most affluent areas of the city will never see MIH applied, as there will be no incentive in strong market areas for there to be a developer-driven zoning proposal. Most likely, this will happen in less desirable and currently more affordable areas of the city, with the result being an increased economic profile and loss of existing affordable units replaced by "luxury" or market-rate housing.

Additionally, the income thresholds - 60%, 80%, 100% or even 120% AMI - are too high for a large portion of those who are most in need of affordable housing. In places like East New York, where the average income for a family of 4 is \$31,000, most people are not eligible and cannot afford even the "affordable" units that are being created.

In sum, I am opposed to both of these zoning text amendments in their current form and I urge the City Planning Commission to withdraw these proposals from the ULURP process immediately



LINDA B. ROSENTHAL
Assemblymember 67th District

THE ASSEMBLY
STATE OF NEW YORK
ALBANY

CHAIR
Committee on Alcoholism & Drug Abuse

COMMITTEES
Agriculture
Education
Energy
Health
Housing

Tourism, Parks, Arts & Sports Development

Testimony of Assemblymember Linda B. Rosenthal Before the City Planning Commission on the Zoning for Quality and Affordability (ZQA) and Mandatory Inclusionary Housing (MIH) Text

December 16, 2015

I am Assemblymember Linda B. Rosenthal, and I represent the 67th Assembly district, which includes the Upper West Side and parts of Hell's Kitchen in Manhattan. I would like to thank the City Planning Commission (CPC) for the opportunity to comment on the Zoning for Quality and Affordability and Mandatory Inclusionary Housing plans. As a member of the New York State Assembly's Committee on Housing and a stalwart housing advocate who has long championed the need for more affordable housing throughout New York City, I am pleased that the City is taking steps to address the affordability crisis that is exacting a huge toll on beleaguered New Yorkers throughout the five boroughs. Unless the City acts, tenants will be priced out of the very neighborhoods they helped to build; however, the City must balance its quest to build and maintain affordability with the economic realities and historical significance of individual communities. Elected officials should not have to ask the City to include the community in this colossal proposal; this plan has been shrouded in mystery from the very beginning, preventing a truly transparent and open process that residents from every borough deserve. While I support the creation of desperately needed new units of affordable housing, this problem is too large and too personal to simply forge ahead with a unilateral policy that blatantly disregards the credible voices and concerns of my constituents and community members. Given that all community boards expressed consternation and downright opposition about the scope and impact it would be wise to go back to them with the changes that were promised by the Administration.

The Zoning and Affordability portion of the plan raises far too many questions without offering any concrete details about the plan's impact on the surrounding infrastructure and landmarked buildings. My district has observed an unprecedented level of luxury development and an increase in overall building heights over the past few years. My constituents along Amsterdam Avenue in the West 60's recently saw the addition of a 400-foot luxury apartment complex at 200 West 67th Street, a 185-foot building at 170 Amsterdam Avenue and a soon-to-be 55-story building at 200 Amsterdam Avenue, which will become one of the tallest developments on the Upper West Side. The overdevelopment of those blocks in the West 60's is a microcosm of what Upper West Siders, especially residents living along Riverside Drive and Broadway, will experience if the Administration does not limit the heights of buildings in both contextual and non-contextual districts. The Administration's proposal to eliminate the distinction between narrow and wide streets while simultaneously increasing building heights by 5 to 20 feet, will alter the unique character of the Upper West Side, and further increase the density in a neighborhood where the infrastructure is already under great stress.

While I understand the need for action, further encouraging mass development without providing the community with any additional resources to meet those needs is unacceptable. A school in my district has had a waitlist of over 100 children for the past two years. Will new buildings with a certain number of units be required to develop a school for the students they are adding to the district? Will the New York City Department of Education identify additional resources for this and other schools in my district to handle the increase in students? A popular bus route that is used by many elderly residents, the M104, was severely

affected by the 2010 MTA's budget cuts. Seniors frequently lament the M104's chronic tardiness and unreliability; if additional senior housing is added to the Upper West Side, will the M104 be able to handle an influx of hundreds of additional seniors who rely heavily on buses? The questions I pose are the very issues my community boards handle and discuss with residents every single day; yet, their concerns, and by extension, their hard work and on-the-ground knowledge of their communities have been brushed aside. The Administration's halfhearted attempts to involve the community are insulting to the men and women who volunteer their valuable time to improve this City.

Despite this plan's one-size-fits-all approach, Manhattan Community Boards 4 and 7 are unique and distinct in appearance as a result of decades of hard work by dedicated preservationists, residents and community groups, and as a result these districts reflect the values of the people who live in them. This zoning text would diminish the character of the Upper West Side's historical districts by permitting developers to build on top of landmarked buildings while also eliminating rear yard setback regulations. Creation of a historical district should ensure that a neighborhood's unique charm and character remain unchanged in the midst of continuous development. Although CPC claims that construction in historic districts would be subject to approval by New York City Landmarks Commission (LPC), I find this situation implausible at best. LPC faced immense criticism months ago for de-calendarizing its backlog of 95 properties in a wrong-headed attempt to deal with it. How will the LPC, with a budget of \$5.3 million, handle the hundreds, if not thousands of new requests from developers requesting rooftop additions and other modifications? I fear that many of the buildings communities worked so hard to preserve will fall through LPC's cracks, diminishing many areas' historical significance. Additionally, the Sliver Law, which would be altered if the zoning plan is approved, ensures that the construction of midblock buildings is limited in height to the width of the street. This revision would foster the construction of out-of-scale projects that both Community Boards 4 and 7 have resisted for years; it would alter the cohesive landscape of each neighborhood.

Although the zoning text would remove barriers to building nursing homes, assisted-living programs and larger senior complexes, I am deeply perplexed by decisions not to call for permanent affordable housing for senior citizens. By failing to ensure the permanence of affordable housing for seniors, we are simply kicking the can down the road. The increased bulk and height will remain long after the 30-year affordability promise ends. This Administration is demanding that communities absorb the impact of increased building heights while promising big giveaways to future owners once the 30-year deadline is reached. Chair Weisbrod wrote in a letter to the Manhattan delegation that, "the additional floor height could not be converted to market-rate housing at any time, including after the expiration of the initial regulatory agreement enacted at the time..." However, the letter fails to provide the details of how this Administration will prevent the loss of senior housing years from now. Without a specific mechanism to safeguard against the conversion of affordable housing market-rate apartments in the future, vague statements of intent does not make for a suitable solution.

With respect to the Mandatory Inclusionary Housing (MIH) portion of this plan, I have strong concerns over the proposed area median income (AMI) bands, the payment-in-lieu of taxes fund and the placement of offsite affordable sites.

Every month, my office sees dozens of evictions, many of them low-income residents, who are simply trying to stretch their already meager paychecks in order to keep up with their ever-increasing rents. Although my constituents are urgently seeking alternative housing solutions by applying for lotteries, many of them with annual incomes ranging from \$20,000 to \$35,000 a year, do not qualify for the available lotteries in my district or throughout the City. After reviewing this plan, I am afraid that my constituents who are in need of the most help will not be able to find the relief they desperately need. And it begs the question, for whom is this plan affordable?



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The CPC and the New York City Council will have the opportunity to apply one of three affordable options to a development: at least 25% affordability with an average AMI of 60% (\$36,300 for an individual), at least 30% affordability with an average AMI of 80% (\$48,400 for an individual) or at least 30% affordability with an average of 120% AMI (\$72,600 for an individual). Developers continually argue that building affordable housing is simply too costly; however, Community Board 4 has created 2,571 units of affordable housing with 93.7% of developments at 60% AMI or less. In fact, Board 4 has created 1,574 or 61.2% of affordable units at the 50% AMI level (\$30,250 for an individual). The community boards possess an expert understanding of the economic realities of the neighborhoods they represent. Using this expertise, community boards advocated for affordability by spearheading tough negotiations with developers; we expect no less from the City.

The three-tiered AMI system is inflexible and does nothing to create housing for some of the most vulnerable New Yorkers: those with incomes that fall below the 60% AMI band. A 2014 report issued on economic inequality in New York City by Comptroller Scott M. Stringer illustrates the need for AMI bands that are more representative of an economically diverse constituency: 23.8% of households earn less than \$20,000 and 18.8% of households earn between \$20,000 to \$40,000. To truly change the tale of two cities narrative, it is essential that an additional AMI requirement be included to supplement the middle-income bands, depending on the needs of individual neighborhoods.

A few summers ago, a building in my district, 40 Riverside Boulevard, was the subject of city-wide debate after providing two different entrances for market-rate and affordable tenants. Policy makers at all levels of government decried the ill-advised regulations that sanctioned and even required the separate and unequal treatment of tenants based on income. As offended as everyone was at the time, the current plan would allow developers to build two separate buildings on one lot, one for affordable homes and one for market-rate tenants, or in the alternative, create offsite affordable housing half a block from the development while reducing the distribution of affordable units from 65% of the floors to 50% of the floors in a building.

I have concerns regarding the affordable housing fund that would be operated by the New York City Housing Preservation and Development. Developers who intend to construct developments with between 10 and 25 units would be exempt from the requirement to construct affordable housing units, and would instead be permitted to make a contribution to an affordable housing fund. Though efforts have been made to clarify the details of the fund, it remains unclear as to why the Administration would impose a 10-year deadline for use of the funds collected in a specific community board. Neighborhoods should not have to sacrifice their funding, and community boards should not be forced to sacrifice control over funds they receive in lieu of affordable apartments in their community simply because of an arbitrary deadline. In addition, details about the fund should be finalized before this plan is approved. For example, how will HPD ensure that money collected is spent before the expiration of the 10-year deadline and not held in favor of a future off-site building? Will HPD receive additional funding to maximize the effectiveness of the fund? Will the developer's contribution be based upon the actual cost of building affordable housing in different housing markets across the City?

Building affordable housing should be a priority; however, a unilateral policy that treats diverse communities as monolithic does not reflect the reality of our communities or the affordability crisis plaguing our City. Over the years, our neighbors and our communities have fought and rallied for zoning changes that reflect their values and concerns. While no easy task, any affordable housing plan must encompass the concerns and questions of specific communities in order to be successful, both in perception and in reality. Before we increase the heights and densities of buildings, we need to ensure our communities can actually handle the new development and the increased demand on services. Before we build senior residences throughout the City, we must be sure that we are getting the best deal for our communities and the elderly. Before we create a fund to handle millions of dollars, we should all know how that fund will function. Before we allow developers to create poor floors, we should think of the failed discriminatory policies that preceded it. The key word is “before.” There is too much at stake, too many questions, too many vague answers for this plan to be pushed through the CPC and the City Council. I urge the City to put this process on pause and go back to the community boards to discuss the myriad issues that have been brought up since the plan was introduced. That way, the final plan should reflect the needs of the unique and diverse communities it is designed to benefit.



November 17, 2015

Carl Weisbrod, Chair
City Planning Commission
22 Reade Street
New York, NY 10007

OFFICE OF THE
CHAIRPERSON

DEC 2-2015
29033

**Re: Zoning for Quality and Affordability (ZQA) and Mandatory Inclusionary Housing (MIH)
Text Amendment**

Dear Chair Weisbrod:

We write in regard to the proposed citywide text amendments currently under public review known as Zoning for Quality and Affordability (ZQA) and Mandatory Inclusionary Housing (MIH). If approved, these text amendments have the ability to drastically reshape how housing, particularly affordable housing, is constructed in New York City. Therefore, while these text amendments mark an impressive amount of effort from the Department of City Planning (DCP) and the Department of Housing Preservation and Development (HPD) to address Mayor de Blasio's goal of creating or preserving 200,000 units of affordable housing in NYC, we need to ensure that they also make sense for our communities. These text amendments must include language, provisions and programs that address the needs and desires of all of our neighborhoods.

We previously wrote to you, in a letter dated March 25, 2015, to highlight our concerns with the ZQA text at scoping. At the time, the text reflected a desire to encourage housing construction of all kinds, without tying significant changes in the bulk rules to the true goal: construction of affordable housing. We raised our concerns regarding teardowns, across the board changes to our contextual districts and disregard for community or neighborhood character or uniqueness. Of significant concern at the time, in addition to the need to improve outreach and communication, was that the underlying zoning programs for creating affordable housing were flawed. Therefore, any additional incentives for development should be weighed against these concerns.

1) ZONING FOR QUALITY AND AFFORDABILITY

We are encouraged that two of the main points in our March letter were effectively addressed. We appreciate the administration's efforts in Manhattan to improve communication and transparency with the Community Boards on the intent and content of ZQA, including the advance availability of annotated zoning text to increase informal review opportunities. We were also encouraged to see improvements to the language of ZQA to reflect the principal goal of constructing affordable housing, a goal we adamantly support. The text also adopts many positive streetscape elements from the special enhanced commercial corridor district text, further addressing our concern regarding the quality of the new spaces we will see.

For the first time in the Zoning Resolution (other than the exceptions seen in a limited number of special districts today) the ZQA text will establish a cap on the number of floors in each zoning district to preserve “good” floor to ceiling heights. While we continue to have concerns regarding height increases, we acknowledge that by tying a five-foot height increase across all zoning districts to a defined minimum ground floor height along with a maximum number of stories for a district, the risk of teardowns as it relates to this piece of the text, would be minimal. We also appreciate that the scope of the text was constrained to its principal goal. The text clearly states that any significant increases in bulk and height will only be tied to the provision of affordable housing.

However, not all of our prior concerns were addressed, and now that the full text is available, specific new details or components raise additional concerns and questions.

- If the goal of the text is to encourage construction of new residential units, then we must acknowledge some of the adverse impacts that typically accompany any new construction in Manhattan. Therefore, stated plainly as a necessary element in achieving this goal must be efforts to **fight displacement and secure anti-harassment protections.**
- The provision of additional floor area for facilities that cater to our senior population and allow them to age in place is laudable. However, it is our understanding that the increase in floor area awarded to a developer is permanent and will add to the size of buildings. It is also our understanding that such increased building size will outlast the use-limiting financing that enables it to be used as senior housing. We need to hear more about how **additional permanent bulk that is created for non-purpose built residences such as independent living will be kept affordable in perpetuity.**
- The Sliver Law, which was established as a way to protect midblocks from out-of-scale development, will no longer apply under ZQA when affordable housing is part of a project. **We must protect the applicability of the Sliver Law as a tool to protect neighborhood context.**
- The new text re-organizes sections of the Zoning Resolution under which the Voluntary Inclusionary Housing program is detailed. However, it does not address any of our prior concerns with the program, detailed in a series of letters to DCP and HPD in 2014 and 2015. In addition, we now have similar concerns with the R10 program. If our communities are being asked to make concessions that affect context for affordable housing then the qualifying programs (Voluntary and R10), that may result in as much as 25% height increases must be improved so that they actually produce the affordable housing they should. **Changes in the Voluntary and R10 programs must be considered, and at a minimum a written commitment to do so with an expedited time frame is expected. Please see item 3 below for details on these changes.**
- Many of our communities are concerned about the impact new density may have on the local schools, public transportation and other infrastructure elements. We ask that your office and your respective sister agency reach out to individual community boards to investigate these concerns

and decide if capital improvements are needed to absorb any new residential capacity in these neighborhoods

2) MANDATORY INCLUSIONARY HOUSING PROGRAM

MIH appears to be a thoughtful program to drive the construction of affordable housing in Manhattan. The applicability to areas undergoing neighborhood studies that will result in an increase in residential density (upzoned areas) is clear and the need is justified in the context of our affordable housing crisis. We are pleased that in addition to applying to upzoned areas, MIH will apply to areas that are part of a special permit application where significant new housing will be built. This is a smart way to create additional affordable housing opportunities in Manhattan neighborhoods that see a disproportionate number of these land use actions. However, while the program goal is laudable, and we believe that all development in Manhattan should include affordable units, the text for this future use of MIH leaves a number of unanswered questions regarding:

- **Anti-harassment requirements:** We need protections for existing residents in areas targeted for construction with provisions similar to those in the Clinton Special District, to apply to all MIH areas.
- **On-Site, Separate Building:** We are concerned about language in MIH that allows for the housing of affordable units in a separate building on the same lot as it may replace the concept of “poor door” with “poor building.” The goal of affordable construction needs to be integrated buildings and diversity in our neighborhoods.
- **AMI options:** affordable housing produced under MIH must be affordable to those living in the community and surrounding communities. Currently, the affordability options that MIH makes available are too limited. They fall short of options that require tiers that address the need for apartments that are affordable to families representing the lowest and middle income tiers of families in our respective communities, and while based on averages, potentially will not result in the unit counts we need. Therefore, the options must be expanded to give Manhattan’s diverse communities a real choice in deciding what is affordable for their neighbors.
 - The workforce option should be available in all community districts regardless of whether a development will be eligible to qualify for 421-a benefits. If the goal is a universally applied program, it makes no sense to preclude an option for part of a borough.
 - In many neighborhoods where the current intent is to allow the workforce option, the units at 120% or 130% of AMI will be more expensive than market rents in the area.
 - The options with the deepest levels of affordability do not cover a range that is acceptable to neighborhoods with the greatest need for the deepest levels of

affordability. We proposed adding a fourth affordability option of 20% of units at 40% average AMI to cover the lowest AMI bands.

- **Applicability triggers:** the special permit option in MIH should be expanded, strengthening the threshold for the provision of affordable housing. The current qualifying condition (“substantial new residential density”) is not well defined and so is left open to interpretation by the City Planning Commission. The text should establish minimum thresholds for consideration, as is done elsewhere in the text.
- **Payment-in-lieu Option and Housing Fund:** The 12,500 square footage threshold required for the “payment in lieu of” (PIL) option that allows developers to pay into a local housing fund is too high and does not reflect accurate or realistic zoning calculations we have seen. The number should be lowered to 10,000 square feet and the text clarified to reflect, especially given the larger new construction unit sizes in our communities, that the threshold is the lesser of the square footage or unit count.
- The housing funds that are created by the PIL option are given a general framework in the text, and will need to be articulated by HPD. The zoning text should set a new standard for housing development monies by enshrining specific frameworks for governance, transparency, and strategy for use of the PIL funds, thus eliminating the possibility that future administrations may have different priorities and can unilaterally change the nature of such funds.
- Specifically, we believe that any money generated by a community should be spent in that community. Given that the funds could be used for preservation of units, there should be no sunset clause that allows those funds to be used elsewhere. Further, HPD should report on the strategy and usage of each fund to the relevant Community Board and elected officials. All funds generated through the PIL option must supplement, not replace, other city capital dollars for affordable housing.
- **Community process** - Referral of all MIH applications in the future should serve an important good government goal of ensuring transparency, compliance with the originally agreed upon AMI option, and an opportunity for communities to weigh in on current bedroom count needs as that may have changed since the adoption of an upzoning that applied the MIH program. However, the zoning text needs to reflect these explicit goals so that all parties have predictability and clarity regarding their roles. Part of that predictability includes how much time the Community Board has to review the documents, and an acknowledgement that those concerns will be taken under advisement and that HPD will not act before their review timeframe is completed. These are the concerns we raised with the Voluntary program referral requirement, and were told would be fixed here. **The text must be amended.**

Finally, the **Board of Standards and Appeals (BSA) loophole must be tightened** so that it will only be used in the presence of real hardship and not as the path of least resistance for developers who do not wish to build affordable housing. This could be achieved by adding specificity as to what might be considered “unique conditions” under which developers could seek BSA approval.

3) CHANGES TO CURRENT PROGRAMS

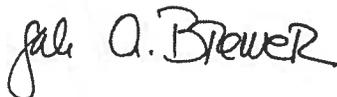
Neither ZQA nor MIH address the crucial fixes that must be made to affordable housing development programs that are already on the books. The **Voluntary Inclusionary Housing Program and the R10 Program** remain untouched. While MIH eliminates the **two-door loophole** for on-site housing that is included in the same building, two-door buildings or physically attached buildings with separate buildings systems may still be built under the old rules that still exist in neighborhoods across the borough.

Other fixes that were previously requested but not included in these text amendments concern:

- **Loose off-site provisions.**
- **Requiring that a greater percentage of square footage is set aside for affordable units** in strong markets where the extra bonus FAR value is lopsided in the developer's favor.
- **Double dipping** with 421-a. While this practice may continue, we should be getting additional units of affordable housing or a deeper level of affordability when this occurs.
- **Inconsistent community review requirements.** Community review is critical in ensuring transparency, affordability and adherence to agree upon AMI options. The text should establish these principles.

We thank you for your past consideration of our recommendations and we look forward to discussion of these concerns. We know that your commitment to improving the text will continue as we all strive to protect and increase affordable housing for all New Yorkers.

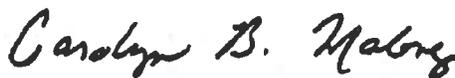
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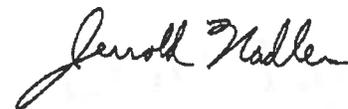
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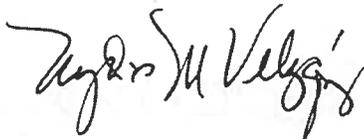
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13th Congressional District (NY)



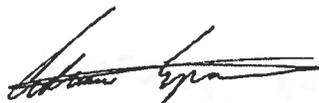
Congresswoman Carolyn Maloney
12th Congressional District (NY)



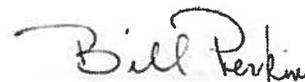
Congressman Jerrold Nadler
10th Congressional District (NY)



Congresswoman Nydia Velazquez
7th Congressional District (NY)



NYS Senator Adriano Espaillat
31st Senate District



NYS Senator Bill Perkins
30th Senate District



NYS Senator Jose Serrano
29th Senate District



NYS Senator Liz Krueger
28th Senate District



NYS Senator Brad Hoylman
27th Senate District



NYS Senator Daniel Squadron
26th Senate District



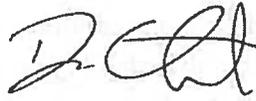
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76th District



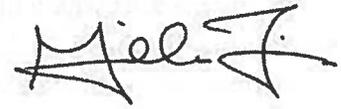
Assembly Member Dick Gottfried
75th District



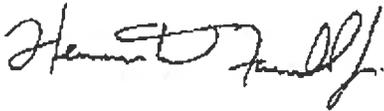
Assembly Member Brian Kavanagh
74th District



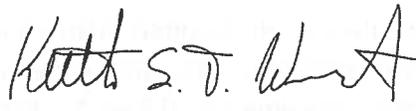
Assembly Member Dan Quart
73rd District



Assembly Member Guillermo Linares
72nd District



Assembly Member Herman D. Farrell
71st District



Assembly Member Keith Wright
70th District



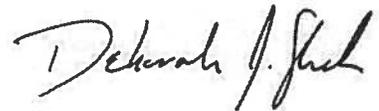
Assembly Member Daniel O'Donnell
69th District



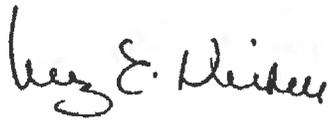
Assembly Member Robert Rodriguez
68th District



Assembly Member Linda Rosenthal
67th District



Assembly Member Deborah Glick
66th District



Council Member Inez Dickens
9th District



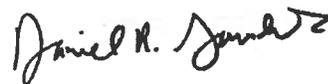
Council Member Mark Levine
7th District



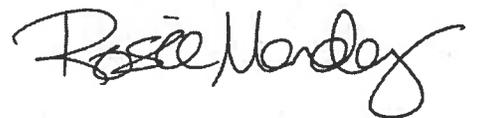
Council Member Helen Rosenthal
6th District



Council Member Ben Kallos
5th District



Council Member Daniel R. Garodnick
4th District



Council Member Rosie Mendez
2nd District



Council Member Corey Johnson
3rd District

- CC: Mayor Bill de Blasio
- Anthony Shorris, First Deputy Mayor
- Alicia Glen, Deputy Mayor for Housing and Economic Development
- Vicki Been, Commissioner, Department of Housing Preservation and Development
- Manhattan Community Board 1
- Manhattan Community Board 2
- Manhattan Community Board 3
- Manhattan Community Board 4
- Manhattan Community Board 5
- Manhattan Community Board 6
- Manhattan Community Board 7
- Manhattan Community Board 8
- Manhattan Community Board 9
- Manhattan Community Board 10
- Manhattan Community Board 11
- Manhattan Community Board 12

B. Borough Boards



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BOROUGH PRESIDENT

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November 30, 2015

Mr. Carl Weisbrod
Chairperson
New York City Planning Commission
22 Reade Street
New York, New York 10007

Dear Mr. Weisbrod:

Pursuant to Chapter 4, Section 85 of the New York City Charter, I convened a meeting of the Bronx Borough Board on Thursday, November 19, 2015. The meeting took place at 851 Grand Concourse. On the agenda as voting items were the text amendments for Zoning for Quality and Affordability (N 160051 ZRY) and Mandatory Inclusionary Housing (N 160049 ZRY). The vote of the Borough Board was as follows:

Zoning for Quality and Affordability (N 160051 ZRY)

The Borough Board vote was 0 in the affirmative; 19 in the negative; & 1 abstention

Mandatory Inclusionary Housing (N 160049 ZRY)

The Borough Board vote was 0 in the affirmative; 19 in the negative; & 1 abstention

Sincerely,


Ruben Diaz Jr.

Brooklyn Borough Board Resolution to Disapprove According to Modifications to the Quality and Affordable Housing Zoning Text Amendment

In regards to Affordable Independent Residence for Seniors Being Retained as a Resource

The Borough Board is concerned that, but for zoning bonus enable floor area, there would be no obligation mechanism to prevent the conversion of affordable independent residences for seniors to market rate housing occupancy beyond the terms of its regulatory agreement (minimum of 30 years according to zoning definition for affordable housing). This is despite generous additional floor area and height, and relaxed parking requirements when compared to market rate housing.

The Borough Board seeks for the zoning text to deter affordable independent residences for seniors from being converted to market-rate housing by amending both Use Group 2 to include a new Use Group 2.B "affordable independent residences for seniors" and that the definition of this use states that to be considered an affordable independent residence for seniors such use is required to have incorporated into its Certificate of Occupancy for the City to be provided the opportunity to provide operating subsidies to extend the regulatory period prior to changing from Use Group 2.B.

Therefore, modify the following sections of the Zoning Resolution:

- ZR 12-10 Affordable independent residences for seniors
- ZR 22-12 Use Group 2

In Regards to Affordable Independent Residence for Seniors and Long Term Care Facilities

- Appropriate Bulk When Developed on Detached, Semi-Detached Blocks and Attached Housing Blocks with no Front Yard Parking

The Borough Board supports the proposal to limit the height, bulk and floor area of independent residences for seniors and for long term care facilities in zoning districts designated for detached, semi-detached homes and low-density attached housing districts (R3A, R3X, R4A and R5A detached home, R3-1 and R4-1 semi-detached districts and R3-2 and R4B attached home districts). The Borough Board is concerned that the proposed as-of-right bulk provisions for affordable independent residences for seniors is too wide-spread for these zoning districts and could potentially result in out-of-context development of incompatible bulk on many blocks in Brooklyn that are characterized as predominantly detached and/or semi-detached where they remain in R3, R4 or R5 multi-family housing zoning designated districts. These conflicts become more apparent along narrow streets. The Borough Board believes that there should be additional consideration in the zoning text for R3, R4 and R5 districts where such residential block fronts predominantly developed consistent with detached and/or semi-detached development, and attached homes with no front yard parking, as a means to preclude

uncharacteristic proposed bulk of affordable independent residences for seniors and long-term care facilities on with housing characteristics.

The Borough Board seeks the establishment of provisions consistent with ZR 23-011 regarding the Quality Housing Program where according to ZR 23-011(c)(3), zoning lots occupied by a single, two or three-family detached, semi-detached residences or and row house districts without front yard parking, where 70 percent or more of the aggregate length of the block fronts in residential use on both sides of the street facing each other are occupied by such residences. The Borough Board believes that such provision would assure that perfectly-sound homes on such blocks are not demolished to develop such out-of-context facilities. In addition such affordable independent residences for seniors to be applicable to long-term care facilities floor area and bulk envelop should not be applicable to zonings lots exclusively fronting along narrow streets.

- Appropriate Height and Bulk for Both Affordable Independent Residences for Seniors and Long-Term Care Facilities When Developed in R3-2, R4 and R5 Multi-Family Districts

The Borough Board is concerned that the proposed one size fits all building height of up to 6 stories or 65 feet beyond 25 feet from the street line is intending to be applied equally without regard to the permitted floor area ratio being 0.95 FAR in R3-2 Districts, 1.29 FAR in R4 Districts and 1.95 FAR in R5 Districts, and without regards to the typical height of buildings in those districts.

The Borough Board seeks 3 stories or 35 feet in R3-2 Districts, 4 stories or 45 feet in R4 Districts and 5 stories or 55 feet in R5 Districts for zoning lots on blocks that do not meet that characteristics of defining detached or semi-detached homes, and attached houses with no parking in the front yard for the R4 district.

- Precluding As-of-Right Status for Long-Term Care Facilities on Detached Zoning Districts and Predominantly Detached Blocks

The Borough Board is concern that the proposed requirement for long-term care facilities to need to obtain discretionary approval (Community Board input) is limited to only R1 and R2 detached single-family home districts. For the remaining detached home districts (R3A, R3X, R4A and R5A) and blocks predominantly developed consistent with detached homes, the proposal would otherwise allow long-term care facilities homes to be permitted as-of-right. The Borough Board is concerned that the proposed as-of-right allowance for long-term care facilities is too wide-spread for these zoning districts and could potentially result in out-of-context development of incompatible intensity of use, especially when fronting along narrow streets because many forms of long-term care facilities are essentially businesses with a significant employment presence seeking placement in low-density residential areas.

The Borough Board believes that similar standards for Community Board input should be applied to R3A, R3X, R4A and R5A detached home districts as well as blocks predominantly developed consistent with

detached homes as a means to preclude as-of-right placement of long-term care facilities amongst detached developed blocks.

The Borough Board understands that the proposed lot sizes and distances from residents for locating a long-term care facility in R1 and R2 single-family home districts would be too stringent for R3A, R3X, R4A and R5A detached home districts as well as blocks predominantly developed consistent with detached homes, though there should be Commission findings regarding the use, its scale and placement of the building that assures a long-term care facility would not alter the essential character of the neighborhood; and, there be adequate buffering from adjacent residences when locating a long-term care facility use in detached home districts as well as blocks predominantly developed consistent with detached homes.

The Borough Board seeks to restrict incompatible use and bulk from detached home areas by making development pursuant to an authorization or special permit approved by the City Planning Commission, as a means to provide standards of findings and Community Board input.

- Appropriate Bulk for Affordable Independent Residence for Seniors (required a City Planning Follow-Up Action) and Long Term Care Facilities Floor Area for R7A Districts fronting Narrow Streets (now affects CDs 3, 4, 8, 12 and 14)

The Borough Board is notes that the maximum floor area for R8B, a zoning district for narrow street frontages, does not provide additional floor area for affordable independent residences for seniors and long-term care facilities (remains 4.0 FAR). The equivalent floor area for R7A mapped on wide or narrow streets has been 5.01 FAR for affordable independent residences for seniors, and, for long-term care facilities, the floor area is proposed to be increased from 4.0 FAR to 5.0.1. The Borough Board believes that the affected mid-blocks should not be treated any different from zoning district designations that might be more in character with block development.

The Borough Board seeks for narrow street frontages to be treated the same by either retaining 4.0 on both the R7A fronting narrow streets and R8B should be increased to match the R7A Inclusionary Zoning FAR standard of 4.6 FAR.

- Assisting Existing Affordable Independent Residences for Seniors Buildings Expand

The Board of Standards and Appeals would have latitude to modify zoning requirement to allow development of Quality Housing Buildings on irregular sites. The Borough Board is concerned that even with more standard lot configuration, existing Affordable Housing for the Elderly developments seeking to utilize remaining development rights find it challenging to complying with zoning rules given initial site planning decisions that might have included accommodation of parking requirements, other site planning building placement considerations and underbuilding of height as a cost savings measure.

In order to assist Affordable Independent Residences for Seniors to develop from the resulting underutilization of permitted floor area, the Borough Board believes that practical difficulties according

to finding (b) should permit the Board of Standards and Appeals more latitude when the ownership of Affordable Independent Residences for Seniors remains the same.

- Limiting Applicability of Community Facility Bulk for Long-Term Care Facilities or philanthropic or non-profit institutions with sleeping accommodations for Blocks Characterized by Detached and Semi-Detached Development in R3, R4 and R5 Districts

The proposed text does not permit Community Facility Bulk being applied to long-term care facilities or philanthropic or non-profit institutions with sleeping accommodations for R3A, R3X, R4A and R5A detached home and R3-1 and R4-1 semi-detached districts. A City Planning Commission special permit allowance community facility bulk would be applicable for R3, R4 and R5 Districts without regards to whether there is significantly consistent block fronts that are predominantly developed with detached homes and semi-detached homes and are along narrow streets. Approving special community facility floor area bulk permits could potentially result in out-of-context development of incompatible intensity of use. The Borough Board seeks to preclude uncharacteristic proposed bulk of long-term care facilities or philanthropic or non-profit institutions with sleeping accommodations on block fronts predominantly developed with detached homes and semi-detached homes and along narrow streets as such facilities are essentially businesses with a significant employment presence seeking placement in low-density residential areas.

The Borough Board seeks the establishment of provisions consistent with ZR 23-011 regarding the Quality Housing Program where according to ZR 23-011(c)(3), zoning lots occupied by a single, two or three-family detached or semi-detached residence where 70 percent or more of the aggregate length of the block fronts in residential use on both sides of the street facing each other are occupied by such residence be incorporated into sub-sections (2) and (3). The Borough Board believes that such provision would alleviate out-of-context facilities.

Therefore, modify the following sections of the Zoning Resolution:

- ZR 23-01 Applicability and General Purposes
- ZR 22-13 Use Group 3 Community Facilities
- ZR 22-22 Uses Permitted by Special Permit by the City Planning Commission
- ZR 22-42 City Planning Commission Special Permit for Long-Term Care Facilities
- ZR 23-155 Affordable independent residences for seniors Floor Area Ratio
- ZR 23-631 (i) General Provisions Height and Setback Requirements in R3-2-R5 Districts Except for R4A, R4B, R4-1, R5A, R5B, R5D and Special Ocean Parkway Districts
- ZR 24-013 (a)(2) Special provision for certain community facility uses for buildings containing long-term care facilities in R3 through R5 districts except in R3A, R3X, R3-1, R4A, R4B, R4-1, R5A, and R5D Districts
- ZR 73-623 Bulk modifications for Quality Housing Buildings Sites
- ZR 74-903 (a) (2) and (3) Special Permit for certain community facility uses in R3 to R5 Districts and certain Commercial Districts by the City Planning Commission to permit the community

facility floor area ration and bulk provisions containing long-term care facilities or philanthropic or non-profit institutions with sleeping accommodations

In Regards to Providing for Appropriate Building Height

- Transition Height of Taller Avenue Buildings (R6A-R10) to Lower-Rise Mid-Blocks (R1-R6B)

The Borough Board is concerned that the proposal intends to modify the height permitted within 25 feet when R6-R10 districts abut R1 through R6B Districts from 35 feet in R1 through R5 Districts and R6B requirements (50 feet) for R6B Districts to a height of 75 feet. The Borough Board believes that this modification goes totally against the intent of the many neighborhood-wide contextual preservation-based rezoning where the community supported increased density in appropriate locations.

The Borough Board seeks a rejection of this proposed text modification.

- Right Sizing Maximum Height of Buildings With Residential Occupancy for Quality Housing Buildings Providing Affordable Housing Pursuant to the Inclusionary Housing Program

The Borough Board supports providing additional height to provide assurance that developments would contain affordable housing. Though it is concerned that the maximum height and number of stories being proposed is too excessive of an increase to accommodate the intent for the Inclusionary Housing designated area permitted floor area ratio (FAR) to be utilized. The proposed heights would undermine community led efforts to impose contextual height limits in areas rezoned to promote housing development as part of neighborhood-wide contextual rezoning that included contextual preservation-minded rezoning.

The Borough Board seeks to reduce the Maximum Height of Building as follows:

**Maximum Height of Building with qualifying ground floor means second floor at least 13 feet above the sidewalk*

Zoning District	(proposed)non-qualify ground floor	Maximum Height of Building with qualifying ground floor	Maximum Number of Stories
R7A	(100)90	95	9
R7D	(120)110	115	11
R7D (CD 3)	(120)100	105	10
R7 outside Manhattan Core	(100)90	95	9

- Determining Maximum Height of Contextual Buildings (Not in City Planning’s proposal)

Height of contextual buildings are been measured from the level of the street line. It has become apparent that for zoning lots with sloped frontages determining maximum height by measuring from the level of street line is an ill-defined reference term as by itself it does not appear to preclude a developer from measuring height from the highest point of the street line.

The Borough Board seeks to establish the measurement from legal grade of the base plane or some equivalent standard that establishes a mean or average height for sloped frontages.

- Determining Height of the Second Story Above Grade (Qualifying Ground Floor Height Component)

Height of contextual buildings are been measured from the level of the adjoining sidewalk. In order to achieve the additional five feet of building height the height of at least 13 feet the level of the finished floor of the second story above grade. It has become apparent for zoning lots with sloped frontages determining where to measure the level of street line from is inadequately-defined. By itself, the street line reference does not appear to preclude a developer from measuring height from the highest point of the street line.

The Borough Board seeks to establish the measurement from legal grade of the base plane or some equivalent standard that establishes a mean or average height for sloped frontages.

- Zoning Floor Area Reduction for Lobby Ramps to Accommodate Persons with Mobility Disabilities as a Means to Encourage Elevating a First Floor Level

For Quality Housing buildings, a developer would be permitted to exclude up to 100 square feet for each foot above curb level up from the definition of zoning floor area. The Borough Board believes that 100 square feet is nearly 40 percent more than necessary to equate the floor space required to comply with an ADA compliant ramp and with landings, resulting up approximately up to 150 square feet of free development rights – enough to result in a master bedroom. The Borough Board seeks to limit compensation to the area needed to provide the ramp, with additional financial offset received by raising each floor up to five feet above a property where the ground floor remained a sidewalk level.

The Borough Board seeks to reduce the exemption to 70 feet per foot.

Therefore, modify the following sections of the Zoning Resolution:

- ZR23-693 Special Height Limitations Special provisions applying adjacent to R1 through R6B Districts for R6-R10 districts
- ZR 23-662 (b) Maximum height of buildings and setback regulations R6-R10 Districts for Quality Housing buildings, building heights and number of permitted stories and corresponding Table 1 Minimum Base Height, Maximum Base Height, Maximum Building Height and Maximum Number of Stories for Contextual Districts and for Non-Contextual Districts and corresponding Table 1 as it pertains to Maximum Height of Building with non-qualify ground floor/Maximum Height of Building with qualifying ground floor/Maximum Number of Stories
- ZR 23-664 (a) Modified height and setback regulations for certain buildings R6-R10 Districts for Quality Housing buildings providing affordable housing pursuant to the Inclusionary Housing Program and corresponding Table 1 Modified Maximum Base Height and Maximum Building Height for Certain Quality Housing Buildings

- ZR 23-641 Front setbacks in R6-R10 Districts without a letter suffix, corresponding table Maximum Height of Front wall and Required Front Setbacks, ZR 23-642 Alternate Front Setbacks and corresponding table Alternate Required Front Setbacks
- ZR 23-631 (f) General Provisions Height and Setback Requirements in R5D Districts and ZR 23-662 Maximum height of buildings and setback regulations R6-R10 Districts for Quality Housing buildings
- ZR 28-11 Elevated Ground Floor Units R6-R10 Districts

In Regards to Providing for Appropriate Yard Obstructions

- Relaxing Lot Coverage and Rear Yard Requirements for Shallow lots and Shallow Through Block Lots for R6-R10 Districts and Commercial Equivalents

The proposal would change the definition from 70 feet to 95 feet (*Note: Lower Density Districts would remain at 70 feet*) in depth to define a shallow lot and 190 feet to define a shallow through lot. The Borough Board believes such standard would be too permissive towards achieving City Planning's intent towards quality design and achieving permitted floor area without the need to obtain a Variance from bulk provisions. The Borough Board is concerned that adopting the proposal would result in overly permissive rear yard enlargements altering the character of the collective rear yards of a block. There are sections of Brooklyn blocks that are not characterize by the standard block width of 200 feet. For these blocks often there are a string of lots consistently at 80 or 90 feet in depth with yard character well-defined. The existing collective feel of rear yards might be compromised by more liberal lot coverage if the existing shallow lot standard were increased from 70 feet to 95 feet of depth.

The Borough Board seeks for shallow lot provisions to be increased from 70 feet to 80 feet and shallow through lots be defined by 180 feet as means to provide a degree of relief without the need for a Variance.

Permitted Obstructions in Required Yards or Rear Yard Equivalents in R6A and R7A Districts

- Restricting on Certain Narrow Street Frontages the Proposed Allowance of A One-Story Enlargement On Rear Yards That Contain Common Amenities Such as Laundry Rooms, Recreation Rooms, Etc. (now affects CDs 3, 4, 6, 8, 12, 14, 15)

Coverage of rear yards for a single story is permitted for certain zoning districts based on street right-of-way width and where parking is permitted to enclose a one level garage. The proposal would allow amenity spaces in such yards for contextual buildings for sites in certain zoning districts typically designated along wide street right-of-way properties.

The proposal would permit rear one-story building enlargements up to 15 feet in height might in R6A and R7A districts without regard to street right-of-way width. Equivalent height and density zoning districts meant to be designated along narrow street width (*R6B, R7B and R8B Districts*) would not be permitted to have rear yard placement of such amenities. If certain narrow street width blocks were

mapped R7B or R8B in lieu of R6A or R7A the rear of these properties would not permit the proposed one-story amenity space. Though, because of R6A and R7A zoning status, new enlargements could potential become an appropriate intrusion for the character of the collective rear yards for these blocks. The Borough Board believes that the collective rear yard experience for these blocks with narrow-street widths should remain protected as would be the case if initially zoned R7B or R8B.

The Borough Board seeks for zoning lots located in an R6A or R7A District that fronts along a narrow street to be regulated consistent with R6B, R7B and R8B districts, where such rear yard intrusion would not be applicable according to the proposed text.

- Appropriate Placement of Overlapping Buildings in NYCHA Campuses When Utilizing Excess Development Rights

The proposal seeks to use the more minimal standards of the New York State Multiple Dwelling Law for opposing wall condition for heights in excess of 50 feet to require not more than 40 feet between walls where legal windows are involved for building walls of undefined length of overlap for buildings up to 125 feet in height.

The Borough Board is concerned that the New York State Multiple Dwelling Law standard of 40 feet between building walls of undefined length of overlap does not adequately provide for light and air. Given the expectation of utilizing excess development rights of NYCHA campuses and existing affordable independent residences for seniors, there should be an expectation of quality light and air standards as opposed to provisions that allow less than desirable building placements.

The Borough Board seeks a maximum length where distance between building walls of connected buildings exceed 50 feet in height when at least one wall contains legal windows, with a maximum requirement of 60 feet between such building walls and a maximum length where distance between buildings up to 125 feet in height when at least one wall contains legal windows, should have a maximum length of overlap within the standard of 40 feet and then require up to a maximum requirement of 60 feet (standard for two abutting rear yards) between such building walls.

- Appropriate Corner Lot Coverage to Promote Wrap Around Building Walls

The proposal would modify the maximum residential lot building coverage for a corner lot to 100 percent, in lieu of the existing 80 percent provision, without regard to lot width. The Borough Board believes that the such design flexibility promoted by 100 percent lot coverage could promote substandard room layouts/proximity to windows, including so called offices and dens that would not meet light and air standards for living and sleeping rooms, with some merely having a lot line window that could be either blocked by the adjoining side street property or else introduces by overlooking the collective rear yard. Allowing 100 percent corner lots do promote the elimination of street wall gaps and allows maximum floor area to be achieved with less height. In order to promote these goals

without the risk of substandard floor plan layouts, the Borough Board believes there needs to be a maximum width to apply the corner lot 100 percent coverage standard.

The Board seeks to retain the 80 percent corner lot provision, except for sections of corner lots with lot width not exceeding 30 feet which may have 100 percent coverage.

Therefore, modify the following sections of the Zoning Resolution:

- ZR 23-156 Special lot coverage provisions for shallow lots in R6-R10 Districts, ZR 23-52 (b)(2) Special Provisions for Shallow Interior Lots, ZR 23-533 Required rear yard equivalent for Quality Housing buildings and ZR 23-534 Special Provisions for Shallow Through Lots R6-R10 Districts
- ZR 24-164 Special Provisions for Zoning Lots Containing Both Community Facility and Residential Uses Location of Open Space Residential Portion R1-R9
- ZR 23-711(b)(1) Standard Minimum Distance Between Two or More Buildings on a Single Zoning Lot R3-R10 Districts for separated portions of a building above roof of connecting abutting building portion
- ZR 23-711(b)(2) Standard Minimum Distance Between Two or More Buildings on a Single Zoning Lot R3-R10 Districts for Two or more buildings on a single zoning lot
- ZR23-153 Quality Housing Buildings Corner Lot Coverage

In Regards to Providing for Appropriate Parking

Appendix 1: Transit Zone

The Borough Board is concerned that the Transit Zoned as mapped is too extensive. The following should be given consideration in terms of refining Transit Zone boundaries:

- All of Community Districts (CD) 1, 2 and 3 are considered to be within the transit zone in areas where the half mile from the subway station was limited to G Line service, a route that often is dependent on infrequent service and typically requires transfers.
- Certain areas of CD1 have added obstacles of crossing the Brooklyn-Queens Expressway trench and elevated sections to reach subway stations.
- Certain areas of CD 2 require crossing under the elevated BQE across Park Avenue and sustained walking up hill.
- For CD 3, pending determination of partial removing from the Transit Zone.
- For CD5, the section south of Linden Boulevard and east of Malta Street should be removed from the Transit Zone.
- For CD6, the section west of the Brooklyn-Queens Expressway trench and south of the elevated sections of the Gowanus Expressway across Hamilton Avenue.
- For CD 8, should be removed from the Transit Zone
- For Community District 9, the section west of Utica Avenue to south of Empire Boulevard extending east of Brooklyn Avenue, should be removed from the Transit Zone.

- For CD 11 should be removed from the Transit Zone.
- For CD 13, the section west of West 22nd Street should be removed from the Transit Zone.
- For CD 14, pending determination of partial removing from the Transit Zone.
- For CD 15, the section to the south of Avenue P and north of Neptune Avenue between Coney Island Avenue and Ocean Parkway Avenue, and east of East 21st Street, should be removed from the Transit Zone.
- For CD 17, the section west of East 93rd Street to south of east New York Avenue to Utica Avenue and east of Brooklyn Avenue should be removed from the Transit Zone.
- For CD 18, the section south of Flatlands Avenue should be removed from the Transit Zone.
- Parking Requirement for Affordable Independent Residences for Seniors

The proposal attempts to better reflect the reality of parking lot usage for affordable independent residences for seniors. In doing so, it would facilitate the elimination of parking requirements to existing affordable independent residences for seniors within the transit zone. Though, permitting elimination does not appear to reflect the extent of observed utilization of such existing accessory group parking facilities. Displacing the on-site parked cars – whether they belong to residences, staff, or visiting medical technicians -- might result in a quality-of-life impact for the residents of surrounding blocks by displacing existing off-street parking with the resulting added competition for on-street parking on surrounding streets.

Outside the transit zone the proposed rate decrease from 35 percent in R3 and R4 Districts and 31.5 percent in R5 Districts to 10 percent appears to be too much of a decline given that these locations might induce automobile trips associated with building staffing or visiting medical technicians for such residences in combination with the number of senior households that might still own cars when relocating to such affordable independent residences for seniors and might have a degree of dependency on such automobiles for trips ranging from medical appointments, purchasing food and consumer goods and lifestyle in these less than assessable neighborhoods outside the transit zone.

The Borough Board seeks to modify by limiting the as-of-right reduction of the number of parking spaces in such existing group parking to fifty percent unless the resulting parking waiver would facilitate the elimination of such parking requirement, and for group parking facilities outside the transit zone, that in lieu of ten percent, to limit the reduction of parking requirement to 15 percent in R5 Districts and 20 percent in R3 and R4 Districts.

- Additional Consideration for the Board of Standards and Appeals to Find in Order to Reduce or Waiver Parking Requirements for: market rate developments in the transit zone providing income-restricted housing; Existing income-restricted housing and affordable independent residences for seniors (and City Planning Commission for Large Scale Plans)

The Borough Board is concerned that findings do not: adequately define a distance to what might be considered the surrounding area; mention finding parking as what might have an undue adverse effect;

give consideration to the availability of parking in the surrounding area and proximity to public transportation; and, contain similar factors as identified in ZR 73-434 Reduction of existing parking spaces for income restricted housing units for addition safeguard that might be imposed by the Board of Standards and Appeals.

The Borough Board seeks to define the surrounding area as up to 1,000 feet and that the Board of Standards and Appeals and the City Planning Commission must consider the availability of parking in the surrounding area and the proximity of public transportation as addition factors in determining the amount of parking spaces to reduce or waive.

Therefore, modify the following sections of the Zoning Resolution:

- ZR 25-252 Required Accessory Off-Street Parking Spaces for Residences – Modification of Requirements Where Group Parking Facilities Are Required R1-R10 Districts for Affordable Independent Residences for Seniors
- ZR 25-261 Waiver of Requirements for Small Number of Spaces for R7A Districts and ZR 25-33 Waiver of Requirements for Spaces below Minimum Number for Permitted Non-Residential Uses
- ZR 73-433 Reduction of (market-rate unit) parking spaces in the Transit Zone to facilitate affordable housing
- ZR 73-434 Reduction of existing parking spaces for income restricted housing units and ZR 73-435 Reduction of existing parking spaces for affordable independent residences for seniors
- ZR 74-532 Special Permit Reduction or waiver of parking requirements for accessory group parking facilities by the City Planning Commission in conjunction with large scale development in the transit zone

Additional Matters That Would Further the Proposals' Goals of Promoting Affordability but Are Beyond the Scope of the Current Proposal and Should be Considered as Part of Future Actions or Zoning Reviews

- Reducing Height of Buildings With Residential Occupancy When Not Including Affordable Housing (Not in City Planning's proposal)

When developed without affordable housing, Voluntary Inclusionary Housing designated areas with height limits have typically 11 to 16 percent less permitted floor area ratios than the same zoning district designation for non-Inclusionary Housing designated areas with the same height limit. The Borough Board does not see further need to accommodate less provided floor area in the same height as non-designated areas. The Borough Board is concerned that continuing to maintain the maximum height and number of stories for R6-R10 Districts where such districts are according to the provisions of Inclusionary Housing designated areas without the benefit of the providing affordable housing sends the message to developers that affordable housing is not enough of a priority. The City should be leveraging the financial value of upper floors as an additional incentive to participate in the Inclusionary Housing

Program. Holding back one to four stories (depending on district) of now permitted height unless the affordable housing bonus is used – as views have value -- turns added height into a financial incentive to participate in the incentive program.

The Borough Board seeks to reduce the Maximum Height of Building as follows:

**Maximum Height of Building with qualifying ground floor means second floor at least 13 feet above the sidewalk*

Zoning District	(existing) non-qualify ground floor	Maximum Height of Building with qualifying ground floor	Maximum Number of Stories
R6A	(70)65	70	6
R7B	(75)65	Not Applicable	7
R7A	(80)75	80	7
R7D	(100)90	95	9
R7D in CD3	(100)80	85	8
R7X	(125)110	115	11
R8A	(120)105	110	10
R8X	(150)130	135	13
R9A	(145)120	125	12
R9X	(160)150	155	15
R10A	(185)170	175	17

**and comparable provisions for equivalent non-contextual districts.*

- Allowing Community Facility Uses to Have A Higher Rear Yard Coverage Height (Not in City Planning’s proposal)

In certain situations, Community Facilities are permitted to cover the entire rear yard up to a height of 23 feet with the roof counting as meeting residential open space requirements.

By utilizing the proposed ground floor height incentive that allows building heights to be increased by five feet, it might not be possible to place two floors of community facility use in the rear yard while not exceeding 23 feet. This places community facilities with a choice between balancing the opportunity of achieving additional ground floor height that is otherwise offset by reducing the amount of overall community facility floor area because the second floor would not be able to extend into the rear yard because of the roof needing to be above 23 feet—which is not permitted. Without adjusting the qualifying rear yard height, which is now up to 23 feet above curb level for meeting the required residential open space requirement upon the roof of the community facility portion of such building, might preclude use of the ground floor incentive or the provision of a two stories of community facility use extending into the rear yard.

In order to promote community facility ground floor height without compromising community facility floor area placement, a nominal increase in permitted rear yard obstruction height would address this circumstance.

The Borough Board seeks to modify the qualifying community facility rooftop residential open space height to 25 feet.

- Decrease the Number of Market Rate Units and for Community Facility Use Where Parking Needs to Be Provided in Certain Community Districts (Not in City Planning's proposal)

As neighborhoods are being upzoned, often in proximity to rapid transit, not enough consideration has been given to auto-lifestyle consideration for households able to afford cars living further from Downtown Brooklyn. Where prior zoning might require parking for developments with more than ten units, these new districts merely require development of more than 30 units to provide parking. The same standard for community facility use jumped from at least requiring that 25 parking spaces to required parking to not exceeding 40 spaces. This parking waiver appears to be excessive for neighborhoods in the outermost sections of Brooklyn where car ownership rates tend to reflect lifestyles where quality-of-life depends on the ability to find parking.

The Borough Board seeks to modify in Community Districts 3, 4, 9, 10, 11, 12, 13, 14, 15, 17 and 18 (more districts might be added) the residential waiver in certain R7A Districts from 15 spaces to the R6, R7-1 and R7B standard of five spaces and the community facility use waiver from 40 spaces to the R6, R7-1 and R7B standard of 25 spaces.

- Encourage Income Restricted Housing Through Parking Reductions for Development in the Special Downtown Brooklyn District (Not in City Planning's proposal)

The Special Downtown Brooklyn District's market-rate housing parking requirement was recently reduced to a requirement of 20 percent of the housing units. The Borough Board believes that the cost-savings from providing less structured garage parking should be leveraged to provide for income-restricted housing. Therefore, the opportunity that reduced required parking to 20 percent, when not providing income-restricted housing, should be revisited.

The Borough Board seeks to condition the parking reduction on the utilization of the Inclusionary Housing program provisions.

Therefore, modify the following section of the Zoning Resolution:

- Regarding ZR 101-51 (a) Minimum Parking Requirements for Off-Street Parking Regulations

Furthermore, as many areas zoned R3-2, R4 and R5 are not receiving the same protection from the Zoning Resolution as districts that preclude attached housing or attached housing with parking in the front yard, from precluding bulk and height pertaining to affordable independent residences for seniors and to long-term care facilities, the Borough Board seeks preliminary analysis of all R3-2, R4 and R5 Districts to determine where Districts such as R3A, R3X, R3-1, R4A, R4-1, R4B and R5A are appropriate and then for the Department of City Planning to undertake such rezonings.

ZONING FOR QUALITY AND AFFORDABILITY (ZQA)

**MANHATTAN BOROUGH BOARD
RESOLUTION**

RECOMMENDING CONDITIONAL DISAPPROVAL OF AN APPLICATION BY THE DEPARTMENT OF CITY PLANNING PURSUANT TO SECTION 201 OF THE NEW YORK CITY CHARTER FOR AN AMENDMENT TO THE ZONING RESOLUTION OF THE CITY OF NEW YORK TO MODIFY ARTICLES AND RELATED PROVISIONS CONCERNING DEFINITIONS, USE, BULK, AND PARKING REQUIREMENTS FOR RESIDENTIAL, COMMUNITY FACILITY, AND MIXED-USED BUILDINGS IN MEDIUM AND HIGH DENSITY RESIDENTIAL OR EQUIVALENT DISTRICTS.

WHEREAS, The Department of City Planning (DCP) seeks a text amendment (N 160049 ZRY) in order to address the needs of affordable housing construction, aid in the efficient use of housing subsidies, and encourage higher-quality residential buildings in the city's medium and high density neighborhoods; and

WHEREAS, The City of New York is continuing to struggle with an ongoing affordable housing crisis due to a combination of rapidly disappearing rent-regulated and government-subsidized units, high percentage of rent-burdened residents and an insufficient amount of new quality affordable multifamily housing construction due to the technical obstacles of dense development in urban centers, contemporary design and construction methods conflicting with modern municipal restrictions, scarcity of sites, cost of land, and high costs of materials and labor; and

WHEREAS, A changing trend in housing preference has resulted in a migration of young families and seniors attracted to the city's vibrant culture and transit-oriented lifestyle over that of the suburbs; and

WHEREAS, As a result, the city grew to 8.4 million people by 2013 and the population is expected to continue to rise, surpassing 9 million residents by 2040. This population growth is a reflection of the city's success but it also brings with it a growing need for housing at all affordability levels; and

WHEREAS, A mechanism proposed by DCP to address the issues stated above is the citywide text amendment, N 160049 ZRY, known as Zoning For Quality and Affordability (ZQA) which consists of changes to various zoning provisions with citywide applicability. The Proposed Action can be summarized in the following three components:

1. Promote Affordable Senior Housing and Care Facilities

2. Modify Rules That Shape Buildings to allow for new construction methods and design flexibility
3. Reduce Parking Requirements for Affordable Housing; and

WHEREAS, The current proposed action reflects changes made after a draft scope of work was issued on February 20, 2015. At that time Manhattan Borough President Gale A. Brewer and 30 other Manhattan elected officials at the city, state, and federal levels, after reviewing the proposal, and in consultation with community groups, wrote a letter dated March 25, 2015 to Chair Weisbrod of the City Planning Commission outlining concerns about the proposed actions. In response to the letter, submitted technical comments, community board input, and other public testimony provided throughout the public comment period for the draft scope of work, DCP made several amendments to their proposed actions which included:

1. Extending the comment period for the environmental scope for almost an additional month to April 30, 2015
2. A set of refinements to the proposed height changes for R6B, R7A and R8B zoning districts
3. Creating individual profiles for each Community Board that explained those elements of the proposal that would or would not apply in each community
4. Providing presentations to all 59 Community Boards to discuss the proposal with them prior to the formal public review process; and

WHEREAS, The current proposed text and draft environmental impact statement (DEIS) was released by DCP in September 2015; and

WHEREAS DCP's analysis found no significant adverse impacts related to the chapters on land use, zoning, or public policy, socioeconomic impacts, community facilities and services, open space resources, natural resources, water and sewer infrastructure, transportation, solid waste and sanitation services, public health, neighborhood character, and construction. The DEIS also concluded that the proposed action would be consistent with the city's greenhouse gas (GHG) and climate change goals. DCP's analysis did find that the proposal would potentially result in adverse impacts related to incremental shadows, new sensitive receptors closer to existing train operations on elevated train tracks, additional in-ground disturbance that could occur on sites where hazardous materials exist and on sites where archaeological remains exist; and

WHEREAS, Borough Boards shall review and make recommendations with respect to applications and proposals of public agencies and private entities for the use, development or improvement of land located in more than one district; and

WHEREAS, the proposed text amendment has the potential to change or impact the built environment in all 12 of Manhattan's Community Boards; and

WHEREAS, Borough Boards shall otherwise consider the needs of the Borough; and

WHEREAS, On November 19, 2015 the full board of Community Board 1 approved a resolution recommending denial of the Zoning for Quality and Affordability zoning text amendment unless certain conditions are met; and

WHEREAS, On November 19, 2015 the full board of Community Board 2 approved a resolution recommending denial of the Zoning for Quality and Affordability zoning text amendment unless certain conditions are met; and

WHEREAS, On November 24, 2015 the full board of Community Board 3 approved a resolution recommending denial of the Zoning for Quality and Affordability zoning text amendment; and

WHEREAS, On November 4, 2015 the full board of Community Board 4 approved a resolution recommending denial of the Zoning for Quality and Affordability zoning text amendment unless certain conditions are met; and

WHEREAS, On November 12, 2015 the full board of Community Board 5 approved a resolution recommending denial of the Zoning for Quality and Affordability zoning text amendment unless certain conditions are met; and

WHEREAS, On November 18, 2015 the full board of Community Board 6 approved a resolution recommending denial of the Zoning for Quality and Affordability zoning text amendment; and

WHEREAS, On November 19, 2015 the full board of Community Board 7 approved a resolution recommending denial of the Zoning for Quality and Affordability zoning text amendment unless certain conditions are met; and

WHEREAS, On November 10, 2015 the Land Use Committee of Community Board 8 (which is constituted as a committee of the whole board) agreed to submit a letter voicing its concerns regarding the Zoning for Quality and Affordability zoning text amendment; and

WHEREAS, On November 19, 2015 the full board of Community Board 9 approved a resolution recommending denial of the Zoning for Quality and Affordability zoning text amendment unless certain conditions are met; and

WHEREAS, On November 6, 2015 the full board of Community Board 10 submitted a letter stating that the public review process was unduly rushed and that the Board could not take a position in support or opposition and outlining its concerns; and

WHEREAS, On November 23, 2015 the full board of Community Board 11 approved a resolution recommending denial of the Zoning for Quality and Affordability zoning text amendment unless certain conditions are met; and

WHEREAS, On November 24, 2015 the full board of Community Board 12 approved a resolution recommending denial of the Zoning for Quality and Affordability zoning text amendment unless certain conditions are met; and

WHEREAS, Manhattan Borough President Gale A. Brewer on November 16, 2015 held a public hearing on Zoning for Quality and Affordability, at which 55 speakers testified, of which 47 speakers testified in opposition to the proposal and 8 speakers testified in favor of the proposal; and

WHEREAS, Manhattan Borough President Gale A. Brewer and 27 other Manhattan elected officials at the city, state, and federal levels, after reviewing the proposal, and in consultation with community groups, wrote a letter dated November 17, 2015 to Chair Weisbrod of the City Planning Commission outlining the following concerns with the proposal known as ZQA:

1. The additional bulk allowed for senior housing is not required to be permanently affordable;
2. The proposal undermines the Sliver Law for projects that involve any affordable housing, paving the way for out-of-character, too-tall midblock construction;
3. The proposal fails to fix the flaws in the inefficient Voluntary Inclusionary Housing and R10 affordable housing programs, even though it may afford significant height increases for developments in these programs; and

WHEREAS, the Manhattan Borough Board has considered all of the aforementioned Manhattan Community Board resolutions in its deliberations and discussions, the testimony received and heard at the Manhattan Borough President's Public Hearing on this matter on November 16, 2015, the letters submitted by Manhattan elected officials on March 25, 2015 and November 17, 2015, and all relevant materials provided by the Department of City Planning pursuant to Section 201 of the New York City Charter as related to the text amendment N 160049 ZRY; and

WHEREAS, the Manhattan Borough Board believes, based on the aforementioned information, that the following proposed changes to the Zoning Resolution represent strengths with the text as written:

1. Changes to bulk envelopes are now explicitly tied to the provision of affordable housing;
2. Reduction of parking requirements are similarly tied to the provision of affordable housing;
3. The proposal contains language clarifying its intent, as well as clarifying language, and better organization of certain provisions in the Zoning Resolution designed to make it easier to read;
4. A cap on number of stories for all zoning districts would be established;
5. The proposal adopts many significant elements of the enhanced commercial district streetscape regulations including transparency and glazing requirements and would apply them universally;
6. Irregular lot size rules would be rationalized;
7. Certain barriers to good design would be removed; and

WHEREAS, the Manhattan Borough Board believes the following concerns are universal to the Borough of Manhattan:

1. The removal of the distinction between wide and narrow streets would impact “hills and valleys;”
2. The elimination of the Sliver Law would negatively impact streetscape;
3. Removal of rear yard encroachment rules at the ground floor would impact the “historic donut;”
4. The proposed height changes may not be the minimum necessary to achieve the goals of the text;
5. Tying bulk changes to a particular construction technique may not be appropriate and certain construction techniques could cause a loss of jobs in the construction sector;
6. The proposal’s potential impact on historic resources, and the work of the Landmarks Preservation Commission;
7. The proposal’s impact on construction safety;
8. Incentivized senior housing may not be permanent, but the height and FAR increases would be; and
9. R10/Voluntary Inclusionary Housing programs have significant problems not addressed by the current proposal but are being used as the qualifying programs for additional height under ZQA; now

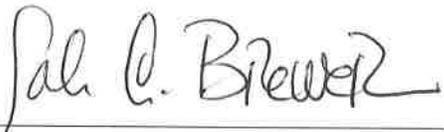
THEREFORE BE IT RESOLVED, the Manhattan Borough Board in its authority recommends disapproval of the citywide text amendment, N 160049 ZRY, known as Zoning For Quality and Affordability, unless the following conditions are satisfied:

1. The text amendment for the City of New York Zoning Resolution (ZR) is revised to maintain the distinction between wide and narrow streets in order to reduce impacts to the historic “hills and valleys” that characterize the development of Manhattan;
2. The applicability of the Sliver Law as it exists today in the ZR remains in place;
3. Applicability of rear yard encroachment rules at the ground floor will be retained in the ZR for residential and residential accessory uses;
4. The proposed height increases are reduced for contextual districts where the impact is greatest on narrow streets and/or in recently rezoned areas;
 - a. Existing A and B contextual zones will remain as currently written and ZQA text will be applied only after individual review and City Planning Commission determination that the change will not harm preservation resources or neighborhood character in the specific zone.
 - b. A and B contextual zoning text as currently written may be applied in the future to zones if there is a City Planning Commission determination that a preservation purpose will be served.
5. The Zoning Resolution will be neutral as to elevating a particular construction technique over another;

6. The administration will recognize and address that changes to the bulk envelopes will spur additional development in historic districts, and that resources be put in place to ensure that all of the work of the Landmarks Preservation Commission, including designation, is not adversely impacted by an increase in permits;
7. The Administration recognizes and responds to the need for construction safety and a plan that addresses current concerns and accounts for the potential for an increase in problems;
8. The text is revised to clarify the permanency of affordable senior housing and if permanency cannot be guaranteed than text should be provided that will ensure permanent affordability for the building regardless of age restrictions;
9. A commitment is made to immediately begin studying and correcting current flaws within the existing opt-in R10 and Voluntary Inclusionary Housing programs; and

THEREFORE BE IT FURTHER RESOLVED, that, as an additional condition of this resolution, the Department of City Planning and the administration should also respond to and address the individual concerns and conditions of the Manhattan Community Boards issued in response to the referral of the text amendment, as should the City Council in the case of any concerns and conditions that remain at the time of City Council action; and all agencies should provide information and seek feedback from community boards as the implementation of the text amendment progresses..

Adopted by the Manhattan Borough Board on the 30th day of November 2015.



Gale A. Brewer
Manhattan Borough President
Chair of the Manhattan Borough Board

Queens Borough Board Recommendation

APPLICATION: ULURP #160049 ZRY

COMMUNITY BOARD: CW

DOCKET DESCRIPTION

IN THE MATTER OF an application submitted by the Department of City Planning, pursuant to Section 200 of the NYC Charter, for a citywide zoning text amendment to promote affordable housing, including mandatory inclusionary housing, contextual height and set back changes, modifications to senior and supportive housing regulations and parking requirements.

PUBLIC HEARING

A Public Meeting was held in the Borough President's Conference Room at 120-55 Queens Boulevard on Monday, November 16, 2015, at 5:30 P.M. pursuant to Section 82(5) of the New York City Charter and was duly advertised in the manner specified in Section 197-c (i) of the New York City Charter. The applicant made a presentation at the October 19, 2015 meeting of the Borough Board. The applicant was present at the November 16, 2015 Borough Board to respond to questions.

CONSIDERATION

Subsequent to a review of the application and consideration of testimony received at the public meeting, the following issues and impacts have been identified:

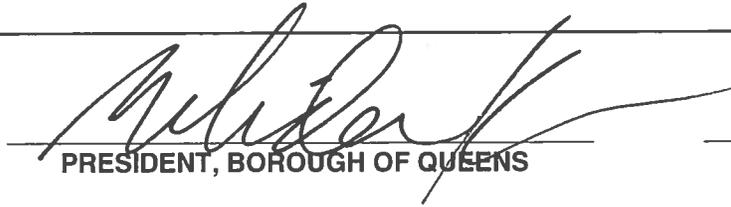
- The Department of City Planning has filed this application known as Zoning for Quality and Affordable Housing (ZQA) to encourage better and more efficient buildings and to allow full utilization of zoning incentives to provide affordable housing;
- Adds or replaces definitions for types of senior housing and care facilities;
- Allows height increase to accommodate elevators in lower density districts not to exceed 4 or 6 stories for senior housing;
- Elimination of parking requirements for affordable or senior housing in transit zones;
- Increase ground floor heights to allow better residential or commercial spaces in medium and high density districts;
- Allows flexibility in design of buildings in relation to the sidewalk, garden areas, courtyards, windows, setbacks and lot coverage;
- The Department of City Planning has made presentations of the proposals at numerous meetings with all of the Queens Community Boards and the Queens Borough Board;
- Concerns have been raised at these meetings regarding several aspects of the ZQA proposal;
- Increased numbers of residents in denser taller buildings will place additional burdens on an already taxed infrastructure system. There are concerns that the schools, streets and transportation systems, sanitation and other services will not be able to handle them adequately
- Reduction or elimination of parking for affordable and senior housing within the newly defined "transit zone" (areas within one half of a mile from a subway station) on the basis that utilization rates are low for senior housing and that residents do not want to pay for the offstreet parking. The concerns raised are: Queens is not well served by mass transportation. The "transit zones" as identified already are the destination points for many who drive to those areas and park on the streets before getting on mass transit because there is nothing closer to their homes. Another concern is that the actual car ownership rates and patterns differ from the research based on registration data.;
- The application also includes proposals in medium and higher density districts that would affect how buildings relate to each other in regards to courtyards, setbacks from the sidewalk and location of garden areas. There are concerns that these design changes could impact the overall visual continuity of an area.;
- Community Board 1 approved this application with conditions by a vote of 29-4-0 at a public meeting held on November 10, 2015. The conditions were as follows: parking must be provided for any affordable housing built, exclusion of some affordable housing floor area from countable floor area and that incentives should be given to produce bigger units to promote a better quality of life, revise Quality Housing Program rules that restricts provision of parking;

- o Community Board 2 disapproved this application with conditions by a vote of 28-2-3 at a public meeting held on November 5, 2015. The conditions were as follows: parking should be provided for affordable housing, except for ground floors increased building heights should not be allowed, irregularly shaped lots should not be developed, and there should not be a Board of Standards and Appeals hardship process;
- o Community Board 3 approved this application by a vote of 16-11-0 at a public meeting held on November 12, 2015;
- o Community Board 4 disapproved this application by a vote of 22-3-3 at a public meeting held on November 10, 2015;
- o Community Board 5 disapproved this application by a vote of 37-1-1 at a public meeting held on November 4, 2105;
- o Community Board 6 disapproved this application by a vote of 22-2-3 at a public meeting held on November 12, 2015;
- o Community Board 7 disapproved this application by a vote of 35-1-1 at a public meeting held on November 9, 2015;
- o Community Board 8 disapproved this application by a vote of 32-0-0 at a public meeting held on November 12, 2015;
- o Community Board 9 disapproved this application by a vote of 33-0-0 at a public meeting held on November 10, 2015;
- o Community Board 10 waived their hearing on this application;
- o Community Board 11 disapproved this application by a vote of 24-1-2 at a public meeting held on October 5, 2015;
- o Community Board 12 disapproved this application by a vote of 29-0-0 at a public meeting held on October 21, 2015;
- o Community Board 13 disapproved this application by a vote of 32-7-0 at a public meeting held on October 26, 2015;
- o Community Board 14 disapproved this application at a public meeting held on November 10, 2015
- o The Queens Borough Board approved a motion to disapprove this application by a vote of 12-2-6 at a public meeting held on November 16, 2015. The 6 abstentions cast were for cause.

RECOMMENDATION

Based on the above consideration, the Queens Borough Board recommends disapproval of this application in its present form for the following reasons:

- Parking should be provided in any new affordable or senior affordable housing because Queens residents own cars and rely on the cars for all aspects of their lives. Without reliable mass transit, cars are necessary to get to their jobs, doctor's appointments, shopping or bringing their children to school.;
- Over forty neighborhoods in Queens were rezoned over the last decade or so. Each of these rezonings were done with extensive neighborhood participation that was solicited by the Department of City Planning to assure that each proposal addressed the most pressing issues and were sensitive to the density and heights of those neighborhoods. Some of the ZQA proposals would undo the carefully sculpted rezonings that were the result of a collaborative effort to protect our neighborhoods from overdevelopment;
- Many of the neighborhoods were rezoned with new contextual tools that helped to encourage the best of how the buildings in each area related to each other in terms of the distances from the sidewalks, depth of yards and other attributes that give a neighborhood a built character. Some of the proposed text may alter some of the features that contribute to an areas appeal.;
- There should not be a new special permit that would allow the Board of Standards and Appeals to modify or reduce bulk requirements for a development with at least 50 % of floor area for affordable housing or long term care on an irregular lot. There is already a Board of Standards and Appeals variance procedure to address this type of hardship for development.



 PRESIDENT, BOROUGH OF QUEENS



 DATE



BOROUGH PRESIDENT RECOMMENDATION
Pursuant to the Uniform Land Use Review Procedure

Application #: **N160049ZRY**
CEQR #: **15DCP104 Y**

Project Name: **ZONING FOR QUALITY
AND AFFORDABILITY**
Borough: **STATEN ISLAND**
Community District(s): **1, 2 & 3**

Please use the above application number on all correspondence concerning this application

Docket Description:

IN THE MATTER OF an application submitted by the Department of City Planning pursuant to Section 201 of the New York City Charter, for an amendment of the Zoning Resolution of the City of New York to support the creation of new affordable housing and encourage better residential buildings. To incorporate these goals, various sections of the Zoning Resolution will be amended.

Recommendation:

- Approve Approve with Modifications / Conditions
 Disapprove Disapprove with Modifications / Conditions

Explanation of Recommendation, Conditions or Modification:

See explanation of Modifications and Conditions on Pages 2 & 3
See Borough Board Resolution Addendum on Page 4

Related Applications:

Contact:

Address questions about this recommendation to:

OFFICE of the STATEN ISLAND BOROUGH PRESIDENT

ATTN: LAND USE DIRECTOR

10 Richmond Terrace, Room G-12

Staten Island, NY 10301

Phone: 718-816-2112

Fax: 718-816-2060



James S. Oddo

President, Borough of Staten Island

12/15/15
Date

Explanation of Recommendations, Conditions or Modification (continued):

The Department of City Planning has proposed a citywide text amendment to facilitate Mayor de Blasio's five-borough, ten-year plan to build and preserve affordable housing throughout New York City known as "Zoning for Quality and Affordability" (ZQA).

- On November 24, 2015, Community Board 3 unanimously adopted a Resolution recommending the disapproval of Department of City Planning Application #N160049ZRY – Zoning for Quality and Affordability (ZQA)
- On December 8, 2015, Community Board 1 overwhelmingly adopted a Resolution recommending the disapproval of Department of City Planning Application #N160049ZRY – Zoning for Quality and Affordability (ZQA)
- On December 9, 2015, Community Board 2 unanimously adopted a Resolution recommending the disapproval of Department of City Planning Application #N160049ZRY – Zoning for Quality and Affordability (ZQA)
- On December 10, 2015, the Staten Island Borough Board overwhelmingly adopted a Resolution (appended hereto) recommending the disapproval of Department of City Planning Application #N160049ZRY – Zoning for Quality and Affordability (ZQA)

After extensive review of the proposed text, communication with Chair Weisbrod and his staff on numerous occasions, and after discussing specific neighborhood concerns with local communities, I communicated my opinion and specific concerns to the Chair in a letter dated November 30, 2015.

I have now considered explanations, responses and additional clarifications articulated by Chair Weisbrod as well as the conditions outlined in the various resolutions of the Staten Island Borough Board and affected Community Boards.

I agree and support all of the conditions cited in the aforementioned resolutions.

I therefore recommend the **DISAPPROVAL** of the proposed application with the following modifications:

1. Remove all proposed parking reductions, waivers and modifications for Lower Density Growth Management Areas (LDGMA) in the Borough of Staten Island with the exception of future Mandatory Inclusionary Housing Areas (MIH) pursuant to Appendix F:

- Section 25-251 ZR – Income-Restricted Housing Units
Retain current parking requirements per income-restricted housing unit pursuant to current §25-25 ZR. Coordinate §128-51 ZR as required.
- Section 25-252 ZR – Affordable Independent Residences for Seniors
Remove parking reductions for income-restricted housing units outside transit zones in R3-R7B zones
- Section 128-51 ZR – Required Off-Street Parking and Loading (Special St. George District)
Remove exception provision for income restricted housing units facilitated through Section 25-252 ZR - Affordable Independent Residences for Seniors
- 2. Clarify provisions for buildings used partially for community facility uses, buildings containing certain community facility uses in LDGMA, special provisions for long-term care facilities or philanthropic or non-profit institutions with sleeping accommodations and quality housing buildings:
 - Section 24-012 (a),(b),(c) and (d) - Exceptions to the Bulk Regulations for Community Facilities in Residence Districts
- 3. Remove increase in lot coverage from 80% to 100% for corner lots containing residential buildings in C4-2 Districts within the Special St. George District - Upland Subdistrict:
 - Section 128-22 ZR – Maximum Lot Coverage – request percentage remain as originally approved

Explanation of Recommendations, Conditions or Modification (continued):

4. Remove applicability of modifications of parking and bulk regulations for LDGM areas in the Borough of Staten Island pursuant to BSA approvals:

- Section 73-435 ZR – Reduction of Existing Parking Spaces For Affordable Independent Residences For Seniors
Remove LDGM areas in the Borough of Staten Island regarding modifications of use or parking waivers pursuant to §73-435 ZR for zoning lots outside the Transit Zone

- Section 73-623 ZR – Bulk Modifications for Quality Housing Buildings on Irregular Sites

5. Develop more contextual senior housing options to be included in the text for LDGMA in the Borough of Staten Island:

- The components of ZQA do not go far enough to address the types of independent senior housing and unique flexibility required to integrate low-density senior housing options into the vast majority of Staten Island communities

6. Remove all R1 and R2 districts in the Borough of Staten Island from provisions applicable to buildings containing long-term care facilities or philanthropic or non-profit institutions with sleeping accommodations:

- Section 24-013 ZR (a)(1) & (b)(1) – Special Provisions for Certain Community Facility Uses

I look forward to continued conversations with Chair Weisbrod and staff to further address modifications necessary to protect the quality of life in all Staten Island communities.

Staten Island Borough Board Resolution

At a meeting on December 10, 2015, the Staten Island Borough Board adopted the following Resolution:

Whereas, the Department of City Planning has proposed two Citywide text amendments to facilitate Mayor de Blasio's five-borough, ten-year plan to build and preserve affordable housing throughout New York City known as "Zoning for Quality and Affordability" (ZQA) and "Mandatory Inclusionary Housing" (MIH); and,

Whereas, the Department of City Planning, working with the Department of Housing Preservation and Development and others, has developed these strategies to address zoning barriers thought to constrain the creation of new housing and add unnecessary costs; and,

Whereas, these amendments seek to advance a vaguely-defined framework to provide citywide guidelines for affordability that do not sufficiently address how the plan might be implemented in existing healthy communities throughout the Borough; and,

Whereas, these amendments seek to unilaterally address senior housing development opportunities without regard for existing neighborhood context, Borough dependency on the automobile, or the character of the built-environment; and,

Whereas, the long-term strategies associated with future "City Neighborhood Planning," including much-needed infrastructure improvements, has not been addressed; and,

Whereas, the Department of City Planning has notified Community Boards 1, 2 and 3 regarding the ZQA-MIH text amendment applications, and as all affected Community Boards have overwhelmingly recommended to disapprove the proposed changes for their respective districts;

Therefore, be it resolved, that the Staten Island Borough Board hereby unanimously approves this Resolution in opposition of the aforementioned zoning text amendment proposals.

By:



James S. Oddo
Staten Island Borough President
Chairperson, Staten Island Borough Board

C. Community Boards



**The City of New York
Bronx Community Board Three**

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**RUBEN DIAZ, JR.
BRONX BOROUGH PRESIDENT**

**GLORIA ALSTON
CHAIRWOMAN**

**JOHN W. DUDLEY
DISTRICT MANAGER**

November 25, 2015

MR. CARL WEISBROD
CHAIRPERSON
CITY PLANNING COMMISSION
CALENDAR INFORMATION OFFICE
22 READE STREET, ROOM 2E
NEW YORK, NY 10007

MR. CARL WEISBROD
CHAIRPERSON
CITY PLANNING COMMISSION
120 BROADWAY, 31ST FLOOR
NEW YORK, NY 10271

**RE: N 160049 ZRY
ZONING FOR QUALITY AND AFFORDABILITY
TEXT AMENDMENT**

**N 160051 ZRY
MANDATORY INCLUSIONARY HOUSING
TEXT AMENDMENT**

Dear Mr. Weisbrod:

The following commentaries and recommendations of Bronx Community Board Three, related to the above text amendments **N 160049 ZRY** and **N 160051 ZRY**, were approved by the full board at its meeting held November 10, 2015, in which there was a quorum of members present and entitled to vote.

ZONING FOR QUALITY AND AFFORDABILITY TEXT AMENDMENT (N160049ZRY)

The citywide text amendment, according to DCP, is aimed at targeting changes to zoning regulations which would address the needs of affordable housing, aid in the efficient use of housing subsidies and encourage higher quality residential buildings in NYC medium to high density neighborhoods. Despite the coordinated efforts of the citywide administration to construct and preserve 200,000 units of affordable housing in 10 years under "Housing New York", this recommended text amendment was developed by DCP, absent of a comprehensive and deliberate approach to educate local community boards in understanding the existing zoning text, and the development implications of the proposed text amendment related to individual districts with varying neighborhood characteristics and zoning designations.

EXECUTIVE OFFICERS

Rev. Bruce Rivera 1 st Vice-Chairperson	Lind Kemp 2 nd Vice-Chairperson	Gail Gadsden Secretary	Leslie Phipps Treasurer	Rita Jones Sgt.-at-Arms/Parliamentarian
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Of particular concern with ZQA, related to the administration's goal of promoting housing affordability, is the notion that city capital resources would be "freed-up" to create more affordable housing, by eliminating parking requirements for affordable, senior housing and voluntary inclusionary housing developments in transit accessible zones, which are areas within a ½ mile radius of public transportation. According to DCP, these developments would become less costly and easier to construct; nevertheless, there is no commitment under this amendment, that the capital resources would be assigned to other development projects within the respective community board from which the savings are realized through the optional waiver.

Bronx Community District Three, in its virtual entirety, has been identified as a transit zone, to make allowances for implementation of optional parking requirements for developers seeking to develop affordable, senior housing and voluntary inclusionary housing developments. Existing parking requirements under current zoning, make allowances for reduced parking utilization for affordable and senior housing to nearly ½ of what would be required for market rate housing. The contention that DCP data collected and verified by affordable housing providers, showing lower parking utilization rates for seniors and low income residents, is already established and accounted for through the existing zoning text. ZQA would serve to impose further restrictions through an optional waiver, adding to the suggestion that the ZQA text amendment is punitive on this issue of parking needs for low income residents, now and into the future.

Additionally, if the ZQA were approved, parking requirements within Transit Zones for existing affordable senior housing developments could be removed as of right, while other existing affordable housing could apply for a new Board of Standards and Appeals (BSA) special permit (Section 73-434), to remove previously provided parking that is not needed.

Furthermore, through a separate BSA special permit, other new buildings being constructed as mixed income developments, could apply to reduce or eliminate their parking requirements under the existing zoning text, provided it would not have an adverse affect on the surrounding area. The ZQA opens the possibility for unlimited complications resulting in on street parking demands, which would otherwise not be exacerbated under the existing zoning resolution.

The ZQA, if approved, would place considerable hardships on residents with mobility impairments and those living in two fare zones. Residents residing within the area of the recently completed Melrose Commons Housing Development have seen the number of vehicles parked on street skyrocket, wherein it may routinely take an hour to find local area parking in the evening.

The ZQA does not take into consideration other options for use of unused parking spaces at affordable, senior housing and voluntary inclusionary housing developments. Owners should be afforded the ability to market unused parking spaces for monthly rental to other community residents, while certain other unused spaces could serve as a resource for caregivers and other professionals attending to the needs of the elderly.

RECOMMENDATION: The Zoning Quality Text Amendment is **not recommended** for support due to the complexities of issues stated.

MANDATORY INCLUSIONARY HOUSING TEXT AMENDMENT (N160051ZRY)

The citywide text amendment, according to DCP, is designed to use zoning to require permanently affordable housing when future City Planning Commission actions encourage substantial new housing. This text amendment would require that for all public and private applications to CPC for re-zoning to encourage substantial new housing, the developer is required to elect one of three options:

- Provide 25% of housing at an average of 60% AMI
- Provide 30% of housing at an average of 80% AMI or in limited emerging or mid-market areas, provide 30% of housing at an average of 120% AMI—no subsidies under this option. (option not available in Manhattan CDs 1-8)

EXECUTIVE OFFICERS

Rev. Bruce Rivera
1st Vice-Chairperson

Lind Kemp
2nd Vice-Chairperson

Gail Gadsden
Secretary

Leslie Phipps
Treasurer

Rita Jones
Sgt.-at-Arms/Parliamentarian

Locations of inclusionary housing units can be on site in same building as market rate units and spread on at least half the buildings stories, with a common street entrance and lobby; on site, separate building, completely independent from the ground to the sky and off-site on a different zoning lot located within the same community district or within a half mile radius.

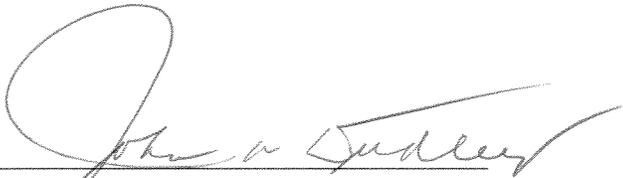
DCP has also provided other considerations including a payment in lieu option for buildings between 11-25 units, into a development fund. Requirements for affordable units could be reduced or waived through BSA, where they would make the development infeasible (legal requirement for hardship relief).

The concern with MIH relates to the consideration, under the text, that the affordable units could be created at a separate building or different zoning lot, which may or may not rest within the boundaries of the community district which is the subject of the re-zoning. These requirements undermine the spirit of the mixed income development options and foster isolation of market rate units from affordable units. Additionally, it is important to understand the means by which affordable developments that are constructed off site, will meet sufficient development timelines and be managed and maintained.

Most importantly as it relates to this proposed amendment, is the question as to how the payment in-lieu option funds will be allocated and spent and whether the payment in-lieu funds from the community board MIH sites, will be spent within the community board, on affordable housing projects.

Lastly, Bronx CB 3 has asked the NYC Department of HPD and HDC, to give consideration to re-evaluating affordable housing eligibility indexes, so that eligibility is based on income derived from census tracts within the county and proposed neighborhood where the project is to be located, as opposed to the NYC AMI which is greater. This approach will afford greater opportunities for admission by residents living in and around the proposed new affordable housing site.

RECOMMENDATION: The Mandatory Inclusionary Housing text amendment is **not recommended** for support due to the complexities of issues stated.



John W. Dudley
District Manager
Bronx Community Board Three

November 25, 2015

CC: Gloria Alston, Chairwoman
Hon. Ruben Diaz Jr., Bronx Borough President
Hon. Ritchie J. Torres, Councilman, 15th District
Hon. Vanessa L. Gibson, Councilwoman, 16th District
Hon. Maria Del Carmen Arroyo, Councilwoman, 17th District

EXECUTIVE OFFICERS

Rev. Bruce Rivera
1st Vice-Chairperson

Lind Kemp
2nd Vice-Chairperson

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Sgt.-at-Arms/Parliamentarian



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Honorable Ruben Diaz, Jr.
Bronx Borough President

Ms. KATHLEEN SAUNDERS
Board Chair

MR. JOSÉ RODRIGUEZ
District Manager

November 9, 2015

City Planning Commission
Calendar Information Office
22 Reade Street, Room 2E
New York, New York 10007

RE: N 160049 ZRY
Zoning for Quality and Affordability Text Amendment
N 160051 ZRY
Mandatory Inclusionary Housing Text Amendment

Dear Members of the Commission:

At a meeting of Bronx Community Board Four held on 27 October 2015, which I chaired, the Board voted not to support the Zoning for Quality and Affordability (ZQA) Text Amendment (N 160049 ZRY) and the Mandatory Inclusionary Housing (MIH) Text Amendment (N 160051 ZRY).

While not voted on, the following recommendations and or comments were discussed:

- Displacement and preservation of current housing stock.
- Lowering of the percentage of the AMI.
- Developing a forth option within the MIH that will allow for higher percentage of the AMI, viable within our Community District.
- Restructuring of transit radius.
- Limiting Board's involvement in community development planning.

Sincerely,


Kathleen Saunders
Board Chair.



THE CITY OF NEW YORK

BOROUGH OF THE BRONX

COMMUNITY BOARD 7



RUBEN DIAZ, JR., BOROUGH PRESIDENT

ADALINE WALKER-SANTIAGO, CHAIRPERSON

November 23, 2015

Hon. Carl Weisbrod
Chairman
New York City Planning Commission
120 Broadway 31st Floor
New York, NY 10271

Dear Chairman Weisbrod:

Community Board #7, Bronx, at its meeting of November 17, 2015, voted to oppose both ULURP application # N 160049 ZRY “Zoning for Quality and Affordability Text Amendment”, by a vote of 20 “ayes”, 0 “nays” and 7 “abstentions” and ULURP # N 1600051 ZRY, “Mandatory Inclusionary Housing” by a vote of, 19 “ayes” and 0 “nays” and 8 “abstentions”.

The Community Board members and members of the public who attended the various Housing and Land Use Committee meetings, as well as the public hearing on these two applications had the following concerns regarding the proposals.

The following concerns were raised regarding the “Zoning for Quality and Affordability Text Amendment,” N 160049 ZRY:

1. An increase in the height of new buildings does not conform to the characteristics of the board area, which is composed of primarily 5 and 6 story apartment buildings with some single-family homes.
2. The one size fits all philosophy of the proposal does not allow for any input from the community.
3. The reduction and elimination of parking at affordable and senior housing sites would be detrimental to our neighborhood which already suffers from a lack of available parking spots for current residents.
4. The proposal does not include any improvements to our infrastructure. Our schools, parks, transit facilities and shopping areas are already overcrowded and over utilized.

The following concerns were raised regarding the “Mandatory Inclusionary Housing Text Amendment N 1600051 ZRY:

1. The formula for calculating the Average Median Income (AMI) and the subsequent rent for these new buildings do not match the income levels in Community Board #7. One formula for the entire city does not fit every neighborhood.



THE CITY OF NEW YORK

BOROUGH OF THE BRONX

COMMUNITY BOARD 7



RUBEN DIAZ, JR., BOROUGH PRESIDENT

ADALINE WALKER-SANTIAGO, CHAIRPERSON

2. The community board is removed from the negotiating process with developers. Under MIH the developer has 3 options for affordability. The need for more middle or lower income developments for a given area is lost by the lack of community input.
3. Community Board #7 already has over 20 new projects in the pipeline. Some are in construction and many are in the process of being approved by the Department of Buildings. Many of these projects are supportive complexes with an affordability component.

We hope that these concerns are addressed as you move forward with these proposals.

Sincerely,

Adaline Walker-Santiago
Chairperson

cc: Hon Ruben Diaz Jr., Bronx Borough President
Hon. Fernando Cabrera, NYC Councilman, 14th C.D.
Hon. Andy Cohen, NYC Councilman, 11th C.D.
Hon. Ritchie Torres, NYC Councilman, 15th C.D.



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Honorable Ruben Diaz, Jr.
Bronx Borough President

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Vice Chairperson

Rosemary Ginty

Secretary

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Treasurer

Philip Friedman

DISTRICT MANAGER:

Patricia Manning

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Sylvia Alexander

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Charles G. Moerdler

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Martin Wolpoff

Libraries & Cultural Affairs

Marvin Goodman

Parks & Recreation

Bob Bender

Public Safety

Joseph O'Brien

Traffic & Transportation

Michael Heller

Youth

Lamont Parker

November 12, 2015

Carl Weisbrod, Chair
NYC Planning Commission
22 Reade Street
New York, NY 10007

Re: Zoning for Quality and Affordability Text Amendment DCP Land Use Review Application No. N160049ZRY

Dear Chair Weisbrod:

At its regular Board meeting held on November 10, 2015, Bronx Community Board No. 8 approved the following resolution by a vote of 35 in favor, 0 opposed and 2 abstentions to disapprove the above referenced application:

WHEREAS, the Mayor has proposed a ten-year plan for affordable housing that recommends the construction of 80,000 new units and the preservation of 120,000 units;

WHEREAS, among a range of initiatives, the Mayor has set forth two, city-wide zoning text changes, one of which is Zoning for Quality and Affordability ("ZQA");

WHEREAS, the proposed zoning text amendment known as ZQA was certified to Bronx Community Board 8 ("Bronx CB 8" or "CB 8") on September 21, 2015;

WHEREAS on October 28, 2015 and November 9, 2015, the Land Use Committee of CB 8 held hearings on and received both Department of City Planning ("DCP") and public comment on ZQA, following prior circulation to Board Members of a link to or a copy of the text thereof;

WHEREAS, Bronx CB 8 believes that each community board has a unique understanding of the special character of its neighborhoods and is in the best position to determine the impact of zoning text changes;

WHEREAS, in 1997 Bronx CB 8 undertook an extensive public outreach process with the goal of developing a community-wide comprehensive 197-a Plan entitled “CD8 2000: A River to Reservoir Preservation Strategy” with many stated goals, including the creation of affordable housing, the protection of the area’s unique character and natural assets and the enhancement of the economic, cultural and social opportunities for its residents;

WHEREAS, on October 22, 2003 the New York City Planning Commission adopted a Resolution confirming the 197-a Plan submitted by Bronx CB 8;

WHEREAS, on November 19, 2003 the New York City Council adopted a Resolution enacting into law the 197-a Plan submitted by Bronx CB 8;

WHEREAS, the ZQA was not a product of community based planning, nullifies many of the advances of the 197-a Plan created by Bronx CB 8 and does not take into account the special character of CB 8;

WHEREAS, the ZQA is a one-size-fits-all approach to planning, attempting to finance affordable housing through zoning to the detriment of and without regard to the character or changing character of communities for generations to come;

WHEREAS, the ZQA allows developers to construct affordable senior citizen apartments as small as 250 square feet for its residents across the City of New York;

WHEREAS, the ZQA increases the density, floor area, height and dwelling unit count of affordable senior housing across the City of New York, which will significantly diminish air, light, open space and living space;

WHEREAS, the ZQA reduces or entirely eliminates the required parking for these new developments across the City of New York ignoring the different and critical transportation needs of neighborhoods within the City of New York and the ability or willingness of government to provide sufficient and efficient public transportation to meet the needs of residents—present and prospective;

WHEREAS, ZQA identified “transit zones” with diminished parking that are located within one half-mile of subway stations but fails to note that only one subway station in CB8, at West 231st Street, is accessible to those with disabilities and senior citizens with impaired mobility,

WHEREAS, ZQA, in an unprecedented action, allows an otherwise impermissible use, which increases dwelling unit count and building height, by permitting multiple dwelling unit buildings called Continuing Care Retirement Community (“CCRC”), to be located in single family R1 and R2 Districts without any necessity for affordable units;

WHEREAS, ZQA, while claiming that the new CCRC use is not as-of-right, allows these multiple dwelling unit buildings in R1 and R2 Districts by only a City Planning Commission authorization, thereby avoiding ULURP, the community board and City Council review;

WHEREAS, the ZQA's draft environmental impact statement ("DEIS") was not certified by an independent third party but rather by the Department of City Planning, which has a vested interest in its approval, thereby creating the appearance of a conflict of interest, if not a conflict;

WHEREAS, City Planning was specifically asked to submit and has failed to establish how and in what particular respects the ZQA will significantly advance the creation of affordable housing, particularly in the context of current initiatives and accomplishments of the Department of Housing Preservation and Development ("HPD") and the NYC Housing Development Corporation ("HDC");

WHEREAS, the DEIS concludes that there are no issues in need of mitigation disregarding the real infrastructure needs of the affected communities and the environmental effects of the resulting new development on the public health, safety and welfare of our city;

WHEREAS, the DEIS is silent on the number of affordable housing units expected as a result of the zoning text changes and has failed to demonstrate how the ZQA will significantly advance the creation of affordable housing;

WHEREAS, the ZQA impairs the goals of contextual zoning which were embodied in Bronx CB 8's 197-a Plan by increasing height, eliminating yards, allowing construction in rear yards and reducing the distance between buildings;

WHEREAS, the changes to contextual zoning are proposed for aesthetic reasons only and do not produce any affordable housing units;

WHEREAS, many of the proposed zoning changes will increase pressure on acquisition and demolition of underdeveloped property for purposes of redevelopment resulting in the likely removal of already affordable housing, thus changing the character of our neighborhoods;

WHEREAS, Bronx CB 8 believes that resources that would be spent on the ZQA could be used more efficiently in other plans rooted in community planning to create and preserve affordable housing;

WHEREAS, Bronx CB 8 supports the underlying general principles of the Mayor's initiative to create 80,000 new units of affordable housing and preserving 120,000 units of affordable housing as outlined in his plan, Housing New York;

WHEREAS, Bronx CB 8 supports all housing programs including the Article 8A Loan Program which create low interest loans and other financial incentives for owners to preserve already existing affordable housing;

WHEREAS, Bronx CB 8 supports the increase of the bonding cap for NYCHDC which creates low interest loans for developers to create new affordable housing;

WHEREAS, Bronx CB 8 supports the funding of city and state programs that protect the rights of tenants of rent-stabilized and other affordable housing units to remain in their homes;

NOW, THEREFORE,

BE IT RESOLVED THAT, Bronx CB 8 is opposed to any zoning text amendment that does not set a minimum unit size at 400 square feet;

BE IT RESOLVED THAT, Bronx CB 8 is opposed to any zoning text amendment that permits multiple dwelling unit buildings to be created in single-family districts;

BE IT RESOLVED THAT, Bronx Community Board No. 8 is opposed to any zoning text amendment that increases the height for contextual buildings and eliminates yards, allows rear yard construction and lessens distance between buildings;

BE IT RESOLVED THAT, Bronx CB8 is opposed to any zoning text amendment that increases the floor area ratio of buildings as of right;

BE IT RESOLVED THAT, Bronx CB 8 is opposed to any zoning text amendment that reduces or eliminates parking;

BE IT RESOLVED THAT, Bronx CB 8 is opposed to the Zoning for Quality and Affordability text amendment.

Sincerely,



Daniel Padernacht
Chairman

Originals sent to:

Mayor Bill de Blasio
Carl Weisbrod, Chair, NYC Planning Commission
NYC Council Speaker Melissa Mark-Viverito
Bronx Borough President Ruben Diaz, Jr.

Carbon Copy sent to:

New York City Council
New York City Community Boards



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RUBEN DIAZ JR.
 BRONX BOROUGH PRESIDENT

WILLIAM RIVERA



DISTRICT MANAGER

November 23, 2015

CAROL J. SAMOL
 BRONX BOROUGH DIRECTOR
 NYC DEPARTMENT OF CITY PLANNING
 1 FORDHAM PLAZA, 5th FLOOR
 BRONX, NY 10458

SERVING

BRONX RIVER

**CASTLE HILL/
 ZEREGA**

CLASON POINT

HARDING PARK

PARKCHESTER

PARK STRATTON

**SOUNDVIEW/
 BRUCKNER**

UNIONPORT

Dear Ms. Samol:

I am writing to formally inform you of our Boards vote on Mandatory Inclusionary Housing & Zoning for Quality Affordability.

On November 18, 2015 the Board voted as follows:

1. Mandatory Inclusionary Housing
 DCP Land Use Review Application No. N160051ZRY

The Board voted unanimously against this application, zero opposed and zero abstentions, because of unsatisfactory information, facts, and lack of time to review concerns. In addition, the board will examine resolution with elected officials, city planning and other available resources, to fully understand the concerns and facts of this amendment to make an informed decision at a future board meeting.

2. Zoning for Quality & Affordability Text Amendment
 DCP Land Use Review Application No. N160049ZRY

The Board voted unanimously against this application, zero opposed and zero abstentions, because of unsatisfactory information, facts, and lack of time to review concerns. In addition, the board will examine resolution with elected officials, city planning and other available resources, to fully understand the concerns and facts of this amendment to make an informed decision at a future board meeting.

If you have any questions feel free to contact me.

Thank You

William Rivera
 District Manager

Cc: Bronx Borough President Ruben Diaz Jr.



Ruben Diaz, Jr.
Borough President

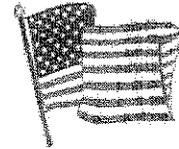
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Martin A. Prince
Chairperson

Kenneth Kearns
District Manager

November 4, 2015

Hon. Bill de Blasio, Mayor
Of the City of New York
City Hall
New York, NY 10007

Re: Zoning for Quality and Affordability and Mandatory Inclusionary Housing

Dear Mayor de Blasio:

Bronx Community Board # 10, at its Public Hearing of October 27, 2015, rejected the above proposals. The proposals were rejected for the following highlighted reasons:

1. The Zoning for Quality and Affordability Text Amendment, or ZQA, if adopted, will result in a serious threat to the downsizing efforts that this Board had put into place. The plan paves the way for the up-zoning of the Board.
2. The decisions regarding the construction of housing under the Mandatory Inclusionary Housing Text Amendment, or MIH, vest the authority in making decisions regarding housing squarely with the City Council and the City Planning Commission. The Community Boards are shut out of the process.
3. The ZQA envisions the construction of senior and affordable housing without parking. This aspect of the plan ignores the fact that seniors (who are defined as 55 years of age and above for eligibility for the Ft. Schuyler House assisted living facility in my Board area) own cars. In Bronx CB #10, we are dependent on the bus system to deliver commuters to the #6 Train. In many cases the communities of our Board are geographically isolated. This system is subject to the vagaries of MTA funding, which three years ago saw drastic cuts in service, necessitating a long and arduous battle to restore service. This experience further cemented in the minds of residents the need for car ownership, which bespeaks a need for parking.
4. The ZQA speaks of locating this housing along transit routes. The #6 train is the only subway line operating in the Board's service area. It only has two stations that are equipped with escalators and elevators. The other five stations along the line require commuters to climb four flights of stairs to reach train platforms. Seniors and those who are physically challenged will have to take buses to the train stations that are equipped with these amenities, exposing them to long commutes.

November 4, 2015

ZQA/MIH

Page two

5. The proposed MIH envisions housing developments that are linked to an economic formula that supposedly will ensure that the developments will have a healthy income mix. Quite frankly, we do not see this happening in our Board area. What we see are large buildings featuring desirable apartments with a 70/30 ratio and no one being able to move in; rent at the 70 percent level is too high for working people, who by the way, will also be ineligible for any subsidy because they make too much. This will leave the property being inhabited solely by those in the 30 percentile, thus defeating the purpose of an economic mix.
6. We are told at every opportunity that there are 68,000 homeless, mostly women and children in our City. Your administration, as well as past administrations has used any and every resource to house people, yet the policy is severely wanting, because it is too expensive, offering little more than basic accommodation in an often unsavory environment. The system is unfair because not every Community Board shares the burden of having shelters. Some have many, and others none.

Under a free market system, several buildings have been built as of right on the sites of former 1-3 family homes in our Board service area. Aside from the fact that they have altered the context of the community forever, they are economic failures, and in the case of one, originally marketed as a condominium, it was flipped overnight into a shelter. This was done without any warning to the Community Board or the electeds. The presence of advocacy groups that work with the real estate community to identify properties in distress and will work to fill the properties with either formerly homeless people or those transitioning out of other settings is a reality. Neither the ZQA nor the MIH discuss the issue of the necessity of providing quality social services to these residents.

7. The literature for both the ZQA and MIH allude to how experts were brought in to develop the Text Amendments. This is a top down plan and not organic in scope. The Community Boards were never consulted, and now the plan is being imposed on the City by power elite.

Attached to this letter you will find a Resolution that was passed by the full Board and a series of bullet points. Each of the points represents a sentiment that was articulated at our Public Hearing. As Chairman of Bronx Community Board #10, I respectfully ask that you read this letter with a critical eye, and not respond with a perfunctory response. The issue of housing is a thorny one and we commend your administration for taking it on.

All we ask is that you be more inclusive and actively solicit the inputs of the Community Boards. We, above all know the needs of our communities, and we stand ready to assist you. After all, our true name is Community PLANNING Board; let us help you to re-design this plan.

November 4, 2015
ZQA/MIH
Page 3

Thank you for your attention and assistance in this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "Martin Prince". The signature is fluid and cursive, with a long horizontal stroke at the end.

Martin Prince, Chairman
Bronx Community Board #10

Cc: L. James, NYC Public Advocate
S. Stringer, NYC Comptroller
Members of the NYC Council
Members of NYC Community Boards

C: #4



Ruben Diaz, Jr.
Borough President

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Martin A. Prince
Chairperson

Kenneth Kearns
District Manager

October 27, 2015

“Resolved...At the Recommendation of the Housing and Zoning Committee of Bronx Community Board #10, that the Committee’s no vote on the Zoning for Quality and Affordability Text Amendment and the Mandatory Inclusionary Text Amendment, be communicated by letter accompanied by a list of recommendations, to all of the elected officials in the City government and each Community Board.”



Ruben Diaz, Jr.
Borough President

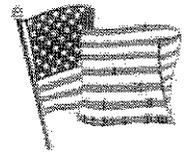
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Martin A. Prince
Chairperson

Kenneth Kearns
District Manager

JOINT MEETING WITH BRONX COMMUNITY BOARDS #10 and #11

October 22, 2015

Present: M. Prince; P. J. Sullivan; A. Chirico; R. Barbarelli - Board #10; J. McManus;
J. Rubino; J. Warneke -- Board #11;
M. Rivadeneyra- Council member Vacca

Staff: K. Kearns

The purpose of this session was for the leadership of both Boards to come together to discuss the upcoming Mayor's Housing Plan and its affect upon the communities served by both Boards. There was a thorough examination of the Zoning for Quality and Affordability Text Amendment and the Mandatory Inclusionary Housing Program. Also discussed was the Borough President's recent meeting with Community Boards, where each Board spoke about their position regarding the Plan. The Borough President suggested that in the event a community board voted no, that the no vote be accompanied with a series of suggestions. This suggestion was discussed among last night's meeting attendees, and it was determined that this was a viable strategy. Briefly the Plan is as follows:

1. There are two portions of the Mayor's Housing Plan, one is the Zoning for Quality and Affordability Text Amendment or ZQA and the other is the Mandatory Inclusionary Housing Text Amendments or MIH.
2. The ZQA reviews all of the City's existing zoning regulations and removes those regulations that are outdated and replaces them with new ones that foster housing growth and affordability.
3. The MIH allows developers to provide high quality housing that features mixed income tenancy. The MIH establishes targets for developments that will receive tax abatements for the construction of affordable housing. It creates an opportunity to build permanency for affordable housing into the development of each project if it is over 10 units and it establishes an affordable housing fund to foster development. The MIH creates two options that pair set aside percentages, with different affordability levels for apartments. When the MIH is applied, the City Planning Commission and the City Council would choose one or more of the two primary options, Option 1. That 25% of the residential floor area shall be deemed affordable to households in the 60% of Area Median Income Index (AMI) with no unit targeted to a level exceeding 130% of the AMI. Option 2, at least 30% of the residential floor area shall be provided as affordable housing to households at an average of 80% of the AMI, with no unit targeted to a level exceeding the AMI of 130%. In areas where housing subsidies to developers are not usually applicable and where the City wants to encourage economic diversity a Workforce Option exists that requires at least 30 % of the residential floor area be provided to households at an average of 120%

of the AMI, with no single household exceeding 130 % of the AMI. This option would apply mainly to Manhattan CB's 1-8. However, it could have applicability in Board #10 and #11.

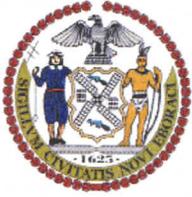
4. The MIH has no applicability to a zoning district, unless the City Planning Commission authorizes it and after it is subject to a public review.

This discussion gave impetus to a larger conversation, regarding the issues that are not addressed in the ZQA or MIH, which are inclusive of the following:

- The problem with the description of the AMI in the MIH, is that it is highly technical and it is not easy to read or understand, its applicability only allows for interaction with the Council member and the City Planning Commission, leaving out the community boards and civic groups, it does not describe the origin of, or the mechanism for the application of the proposed subsidies for developers or the administrative requirements that will be placed on tenants to ensure that they are eligible (i.e. income affidavits).
- The Plan essentially makes all of this housing “as of right”, severely limiting the ability of the community board structure to comment.
- The Plan is a direct reversal of the Board’s efforts to downzone its area, thus preserving its low-density quality.
- The Plan is discriminatory, in that it exempts certain neighborhoods and community boards. This is a citywide plan and all communities should be treated equally.
- The Plan rewards developers for increasing the affordability factor of a building, by allowing them to build higher or to put more apartments in the building. This will serve to increase the density of neighborhoods.
- There is a lack of parking in both the senior and affordable housing complexes; this will have an adverse affect upon the elderly and those with handicapping conditions. They will have to park and walk to their homes.
- The plan does not only affect traditional housing, but it also addresses nursing homes and assisted living facilities. The renovation of older housing for seniors can be conducted under the provisions of these plans. However, with respect to the renovation of older buildings housing seniors, renovations can be conducted in buildings without elevators or which are not compliant with the Americans with Disabilities Act. This will have a negative effect upon the elderly and those with handicapping conditions.
- The literature for the plans contains no discussion on whether the buildings envisioned will be compliant with the Americans with Disability Act. Again, the Plan is disrespectful to the elderly and the handicapped.
- The Program in its present form appears to be a gift to developers who will not only rake in the subsidies associated with the housing, but will also be allowed to develop anywhere and in any way they choose.
- The Plan does not appear to allow for any community benefit packages for a neighborhood to accept a development.

- The Program allows for the development of side or angled lots and increases the Floor Area Ratio or FAR for all buildings. Floor Area refers to the gross area of each floor of a building, excluding the space that holds the (mechanicals i.e elevator equipment), cellar space, floor space in open balconies, elevators or stairwells in most cases, except for projects built under the Mayor's Housing Plan, parking that is located less than 23 feet above curb level. The Floor Area Ratio (FAR) is the main bulk related regulation controlling the size of buildings. The FAR is the ratio of total building floor area to the area of its zoning lot. Each zoning district has a FAR assigned to it. The FAR when multiplied by the lot area of the specific zoning lot, produces the maximum amount of floor area allowed on that lot. Example – on a 10,000 square foot zoning lot in a zoning district with a maximum FAR 1.0, the floor area of the zoning lot cannot exceed 10,000 square feet. Some of these buildings will be built on side lots and both Boards are concerned about zero lot line issues, where a multiple dwelling will be built right up against an existing 1-3 family home, occupying the entire lot and obliterating light and air from one wall on the neighboring house.
- The program has no veterans' housing component.
- There is no definition of what a transit hub really is.
- If the buildings are built along transit hub, seniors and physically challenged residents who use public transportation will be forced to take buses (which are handicapped accessible), to the nearest subway stations that are equipped with handicapped accessible amenities. (In the case of Bronx Community Board #10, only two stations, the terminal stop for the #6 line at Pelham Bay have an elevator and escalator and Parkchester has an escalator. The Pelham Parkway Station on the #2 line in Board #11 has an elevator and escalator). This will prove to be difficult for those who are elderly or handicapped.
- In transit corridor starved districts like Board #10, there is a reliance on buses. There are very few bus shelters in this Board. These shelters are needed for the seniors and the challenged, to wait in, during inclement weather and the construction of such shelters should be part of the senior and affordable housing components.
- Boards like #10 and #11 have a significant amount 1-3 homes in areas that are zoned for low density districts. In the case of Board #10, the eastern half of the Board has been downzoned on several occasions. Additionally, Board #10 has benefitted from the Lower Density Growth Management Area (LDGMA) as well as a Special Zoning District on City Island. Neither Community Board #10 or #11 is interested in having these areas upzoned. The belief is that if the Mayor's Housing Plan goes through, the upzoning will arbitrarily take place. The upzoning of these areas to accommodate multiple dwellings will forever alter the character of these communities and it is not wanted.
- In some instances, senior housing will be constructed without access to elevators.
- The plan makes only vague reference to the upgrading of City services such as infrastructure improvements, new schools, sanitation, fire and police services.

- No reference is made to using local city labor contractors or suppliers to build any of the senior or affordable housing developments. Nor is any reference made to employing New York based minority or women owned firms, in furnishing the supplies or workers for the buildings' construction.
- It seems that the Mayor is not making the project a prevailing wage initiative.
- The plan makes no reference to support services offered to residents of any supportive or transitional housing that will be built under the program.
- The Plan makes no reference to the possibility of developers turning a property that has failed economically, over to social service agencies. This has happened in the past in our Board's area.
- There was a concern about the material used in the construction of so called "quality housing".
- There is no provision in either plan guaranteeing green space, or front or rear yards.
- The plans envision raised entrances off the sidewalks for multiple dwellings and the development of retail space at the sidewalk level. Given that the plans provide for no parking, how will deliveries be accomplished? Will the entrances to the buildings be handicapped accessible?
- The description of the plans makes no mention of EMMA, an initiative that benefits extremely low income tenants, even though we have spoken to City officials that stated EMMA would be part of this Plan.
- Due to the fact that neither the senior, nor the affordable housing programs provide parking for the buildings, no provision exists for vehicular turn arounds to drop tenants off at the front entrances of the buildings. Under the present scenario, tenants will be dropped on busy streets. This will prove to be difficult for senior and the handicapped.
- It was determined that each respective Board would attach suggestions (those presented above for Boards 10 and 11) to their decision. It should be noted that Bronx Community Boards 11 and 12 have subsequently turned down the plans. It was further felt that the Boards should send a letter to every elected official expressing their reservations.



THE CITY OF NEW YORK THE BOROUGH OF THE BRONX



Community Board #12 (The Bronx)

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Chairman

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District Manager

27 November 2015

The Honorable Bill de Blasio
Mayor of the City of New York
City Hall
New York City, New York 10007

RE: HOUSING NEW YORK

*Zoning for Quality and Affordability (Z.Q.A.) [Land Use Review Application #N160051ZRY]
Mandatory Inclusionary Housing (M.I.H.) [Land Use Review Application #N160049ZRY]*

Your Honor:

At its Stated Meeting for October 2015, convened on Thursday evening, 22 October 2015 at 7:30 P.M. in Town Hall -- *i.e.*, 4101 White Plains Road in the Borough of The Bronx -- the membership of Community Board #12 (The Bronx) unanimously voted against a motion endorsing your Zoning for Quality and Affordability (Z.Q.A.) Initiative as well as against a motion endorsing your Plan for Mandatory Inclusionary Housing (M.I.H.). All TWENTY-SIX (26) Members of Community Board #12 in attendance voted in the **NEGATIVE** on the aforementioned motions with **NO** ("0") Members voting in the **AFFIRMATIVE** or to **ABSTAIN** or to **RECUSE**. **FOUR** (4) Members were **ABSENT WITH AN EXCUSE** and **SIXTEEN** (16) Members were **ABSENT WITHOUT AN EXCUSE**.

The aforesaid votes were conducted subsequent to a well-attended Public Hearing convened by the Standing Committee on Land Use of Community Board #12 (The Bronx) on Thursday evening, 15 October 2015 at Town Hall. Messrs. Shawn Brede, Deputy Director of the Bronx Borough Office of the New York City Department of City Planning (N.Y.C.D.C.P.) and Dana Driskell, an Associate at said Office, delivered a presentation on your **HOUSING NEW YORK** Text Amendments to both Members of Community Board #12 along with neighborhood residents. At the conclusion of the Public Hearing, the Standing Committee on Land Use voted to recommend to the entire Community Board that it vote against these two (2) proposals.



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The ensuing list is an enumeration of the various reasons why Community Board #12 (The Bronx) is opposed to both Zoning for Quality and Affordability (Z.Q.A.) and Mandatory Inclusionary Housing (M.I.H.):

- **Community Board #12 seriously questions the need for the aforesaid Plans. The stated objective of your Administration is the availability of two hundred thousand (200,000) units of affordable housing -- eighty thousand (80,000) new units to be created and one hundred twenty thousand (120,000) to be rehabilitated -- within a period of ten (10) years. The Board is of the opinion that HOUSING NEW YORK is a matter of overreach as its method and manner of generating approximately eight thousand (8,000) new units of affordable housing *per annum* is neither reasonable nor warranted, specifically its requirements to amend THE ZONING ORDINANCE OF THE CITY OF NEW YORK, negate progress achieved in contextual zoning and in the downzoning of Districts, and the further diminishment of the role of local government -- *viz.*, Borough Presidents and Community Boards -- in the planning process. Furthermore, the Community Board notes that the annual construction of eight thousand (8,000) units of affordable housing was nearly realized in prior years during previous Municipal Administrations without the aforesaid secondary effects as it also does with great admiration your recent arrangement to preserve five thousand (5,000) units of affordable housing in the purchase of Stuyvesant Town and Peter Cooper Village by The Blackstone Group. The aforementioned were all accomplished without resorting to the rather sweeping undesirable consequences that *HOUSING NEW YORK* involves.**
- **Community Board #12 invested a goodly number of years and energy endeavoring with the New York City Department of City Planning (N.Y.C.D.C.P.) to zone contextually our entire Community District. The slapdash and anarchic development that permeated Bronx Community District #12 during the 1990's and the initial years of the twenty-first century left our District devoid of open spaces and robbed many of our locales of their unique flavor and character. In their stead, tasteless, unattractive housing that crammed several families into a space formerly occupied by one appeared. The concomitant increase in population was not matched by a corresponding expansion of municipal services. HOUSING NEW YORK effectively annuls the advantages attained by contextual zoning and re-imposes prior detriments -- *viz.*, bigger buildings, more people, inadequate infrastructure, over-crowded transportation and educational facilities, greater insufficiency of parking, and**

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overall denser neighborhoods. Peculiarly, neither of these Plans makes any precise mention of or allowance for the analogous provision of the municipal services necessitated by an augmented local population as they likewise fail to identify any actual material benefits that will accrue to a neighborhood as a consequence of participating in HOUSING NEW YORK.

- **The overall effect of your HOUSING NEW YORK Formulas will be a spike in the general population of our Community Districts. As just remarked, HOUSING NEW YORK makes no concurrent commitment to amplify proportionally available municipal services as it further fails to indicate any parallel upgrade in local infrastructure, such as roadways and sewers. Providing folks a *place* to live may resolve one (1) issue, but it creates any number problems absent the aforementioned in affording people the *capacity* to live with a satisfactory quality of life.**
- **While touting Mandatory Inclusionary Housing (M.I.H.) and Zoning for Quality and Affordability (Z.Q.A.) as advantageous to those in need of housing at reasonable rents, these Initiatives are much more to the benefit of developers than tenants. The “*as of right*” stipulations to be written into THE NEW YORK CITY ZONING ORDINANCE relieves developers of the requirement to seek endorsement from agencies of local government -- *viz.*, Community Boards, Borough Presidents, and Borough Boards. In addition to shrinking the planning prerogatives of these local governmental actors as previously posited, it further eliminates the time and the cost of seeking variances and/or special permits and of bringing appeals before the New York City Board of Standard and Appeals (N.Y.C.B.S.A.). Making development of whatever sort under whatever rationale quicker, cheaper, and without adequate local review is big bucks in the pockets of developers and an injurious blow to the quality of life of citizens in our localities.**
- **Your HOUSING NEW YORK Initiatives neglect to include any provisions for the engagement of local labor, the payment of a living wage to workers, the hiring of a diversified work force, or incentives to assist the Veterans of our Armed Forces in procuring housing. The aforesaid are all worthy purposes embraced by Your Honor’s Administration. These glaring deficiencies are further evidence that your HOUSING NEW YORK Plans promote the welfare of powerful developers and real estate interests at the expense of us “*little folk*” who look to Government and to our elected officials to even up the playing field a bit for us.**

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- **Along this same argument, HOUSING NEW YORK does nothing to rescue the “working poor” -- *i.e.*, those New Yorkers with low or working class incomes or those surviving on disability, Social Security, or modest pensions. Those of our fellow New Yorkers who must contend with an increasingly more expensive cost of living while subsisting on fixed or diminishing incomes are astonishingly disregarded in your signature housing initiatives. Indeed, the issue of whether affordable housing is truly affordable must be carefully scrutinized. Recent articles in local newspapers, such as THE NEW YORK DAILY NEWS, report that nearly one-half (½) of all families who now reside in affordable housing are “rent-burdened” -- *i.e.*, expending more than thirty percent (30%) of their disposable income on housing. Even more shockingly, roughly fifteen percent (15%) fall into the category of “severely rent-burdened” with more than one-half (½) of their consumable income eaten up by rent. Apparently, incremental rent increases in affordable developments, many of which are in the Borough of The Bronx, were permitted to increase while tenant income shrunk or remained flat. One-third of affordable renters witnessed their rent growing by greater than twenty percent (20%) and more than one (1) in ten (10) were afflicted with a greater than forty percent (40%) hike in their rental charges. The aforementioned hikes significantly exceed the average rent increase City-wide in the last decade or so.**
- **Considerable apprehension exists on the part of Community Board #12 (The Bronx) as to the issue of what occurs if and when the affordable housing created under the formulations of HOUSING NEW YORK fails to be marketed. In Bronx Community District #12, we have had the unfortunate experience of a developer who constructed a vast array of affordable units -- having received affordable housing tax abatements from the New York City Department of Housing Preservation and Development (N.Y.C.D.H.P.D.) -- not being able to rent them and subsequently turning initially to the New York City Department of Homeless Services (N.Y.C.D.H.S.) and subsequently to not-for-profit (N-F-P) organizations to acquire said units as housing for the homeless. What ironclad guarantees will be given that housing units created for affordable purposes will not similarly be dangled before and gorged by a City with an exploding homeless population as a solution for sheltering the homeless? Kindly note in this regard that, despite assurances by the ranking leadership of N.Y.C.D.H.S. that all scatter site housing for the homeless would be identified for affected Community Boards and that the scatter site policies of the prior Municipal Administration would be terminated, neither commitment**

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has been honored and recently N.Y.C.D.H.S. has announced, not only the perpetuation of the scatter site program, but its expansion in Community Board #12 (The Bronx).

- The most glaring deficiency in your HOUSING NEW YORK Proposals is that, while endeavoring to augment the availability of affordable housing in the City of New York, it utterly ignores the flaws in the City's affordable housing program as currently devised. The rooms in affordable units are too small for comfortable living, especially if one has children. Moreover, these apartments have a paucity of closet space. They are, far and away, nothing as comfortable and as spacious as units in public housing or in developments such as Co-op City in The Bronx. Interestingly, in areas such as Community Board #12 (The Bronx), in which we have been burdened as referenced above with affordable housing schemes, we have simultaneously witnessed the construction of warehouse storage facilities, ostensibly because families in affordable housing want for sufficient closet and storage space.**
- A final trepidation relative to HOUSING NEW YORK, which is of critical concern to Community Board #12 (The Bronx), is the provision that all details of this proposal are subject to alteration by application to the New York City Board of Standards and Appeal (N.Y.C.B.S.A.) and/or to the Council of the City of New York. The intervention of said actors in Municipal Government negates the argument that your HOUSING NEW YORK Proposals will be adhered to in a uniform, reliable, consistent, and apolitical fashion. This Community Board has long suffered under the imperious decisions of N.Y.C.B.S.A., which have been indifferent and injurious to local neighborhoods. Furthermore, since undoubtedly any number of individual projects will undergo review by these bodies, why not allow the longstanding present practice of assessing each affordable housing project on an individual, case-by-case basis to continue? To continue to incorporate roles for N.Y.C.B.S.A. and the City Council maintains the privileged position of the wealthy, the well-lawyered, and the politically astute to the detriment of average, ordinary New Yorkers.**

Particularly with reference to your Plan for Mandatory Inclusionary Housing (M.I.H.), Community Board #12 (The Bronx) raises the ensuing concerns:

- Presentations and materials relative to M.I.H. supplied by the New York City Department of City Planning (N.Y.C.D.C.P.) do not supply reasonable and adequate demonstration of the precise manner in which the sound integration**

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of neighborhoods, an objective of M.I.H. averred by N.Y.C.D.C.P., will be accomplished. The fear, in this instance, is that viable, healthy neighborhoods comprised of families with a diversity of income levels will neither be established nor sustained by this proposal.

- Your Mandatory Inclusionary Housing (M.I.H.) does not involve all neighborhoods and areas universally and equally throughout the City of New York. Notably, affluent Districts, specifically Community Boards #1 through #8 in the Borough of Manhattan, are exempt from compliance with its strictures.**
- The draft Environmental Assessment Statement (E.A.S.) for the Mandatory Inclusionary Housing (M.I.H.) Text Amendment was neither composed, studied, or appraised by an independent, third-party entity, but by the New York City Department of City Planning (N.Y.C.D.C.P.) *per se*. The E.A.S. Form, with any supporting documentation, describes the proposed action and provides an initial analysis of its potential effects upon the environment. Its function is to aid the lead agency, in this case N.Y.C.D.C.P., in a determination as to whether any identified adverse impact on the environment may be significant enough to warrant further analysis in an Environmental Impact Statement (E.I.S.). The fact that the Department itself wrote the E.A.S. for M.I.H., since N.Y.C.D.C.P. has a palpable interest in the realization of this project, is an apparent conflict of interest at best and, in all likelihood, an egregious one. The draft Statement does not furthermore include any reference to issues such as gentrification and the Department has heretofore not deemed fit to provide any information that said subject matter was even contemplated.**
- The New York City Department of City Planning (N.Y.C.D.C.P.) self-certified its own conclusion that any units of affordable housing generated by Mandatory Inclusionary Housing (M.I.H.) will not have any bearing or consequence upon the public safety, health, and welfare of the various neighborhoods of New York City. No justification or rationalization for N.Y.C.D.C.P.'s "negative declaration" in this regard has been provided by the Department, despite various requests for it.**
- The possibility that housing units of a mere two hundred fifty square feet (250 sq. ft.) can be constructed for senior citizens under the provisions of Mandatory Inclusionary Housing (M.I.H.) is objectionable and unacceptable to Community Board #12 (The Bronx). It is, practically speaking, relegating our "golden agers" to an S.R.O.-style -- *i.e.*, Single Room Occupancy -- tenancy.**
- Rather than the Mandatory Inclusionary Housing Text Amendment, Community Board #12 (The Bronx) would prefer that existing programs and those**

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ingrained in sound neighborhood planning that create and/or maintain affordable housing be utilized -- *e.g.*, the Article 8-A Loan Program that creates low-interest loans for owners to conserve affordable units; increasing the bonding cap of the New York City Housing Development Corporation (N.Y.C.H.D.C.) which will produce more low-interest loans to erect affordable housing; and the support of both Municipal and State Programs that enable tenants to remain in their homes, markedly those that assist and/or subsidize tenants in paying their rent.

Relative to Zoning for Quality and Affordability (Z.Q.A.), Community Board #12 (The Bronx) is in opposition to the subsequent stipulations provided in it:

- Its ploy to do away with contemporary parking requirements is so ridiculous as to be unworthy of serious proposal or debate. To postulate that seniors and/or those meeting affordable housing requirements can do without any, or, at the very least, less, parking defies sound reasoning and planning. In areas such as Bronx Community District #12, the need for automotive availability is more than a trifling convenience and its absence can deprive one of the convenience of access needed for shopping, health care, and worship. Seniors and those with lower incomes do and must drive in Community Board #12 (The Bronx). They do and truly need to own a motor vehicle. Moreover, these residents do have family members, friends, and other social acquaintances who, in all likelihood, come to be with them. These visitors require and should have adequate opportunities for parking as well. In the course of discussions relative to this point, it was divulged that the New York City Department of City Planning (N.Y.C.D.C.P.) had relied in part upon the registration records of the New York State Department of Motor Vehicles (N.Y.S.D.M.V.) in order to arrive at its conclusions in this instance. This decision is a serious shortcoming as it should be recognized at this point that far too many City residents register their motor vehicle out-of-state for insurance purposes. The number of vehicles bearing license plates from such States as Florida, Pennsylvania, Ohio, and Georgia -- just to list a few -- are legion.**
- Zoning for Quality and Affordability (Z.Q.A.) identifies so-called "transit zones" that conform to subway lines and extend in area to one-half (1/2) mile on both sides of these routes. Including the line of reasoning just previously mentioned, it should be additionally noted that those Community Districts with more subways lines will be impacted to a greater extent by Z.Q.A. than those**

with less or none. Similarly, no consideration is given to the reality that not all subway stations are compliant with the stipulations of the Federal Americans with Disabilities Act (A.D.A.) and that even those stations that do comply with the law quite frequently are plagued by recurrent equipment failure. The aggravation and the annoyance to be inflicted upon senior citizens of advanced age and/or physical limitations as well as to younger individuals with children, especially those in strollers, by this circumstance will not be insubstantial.

- The argument advanced in my prior comments relative to the Mandatory Inclusionary Housing (M.I.H.) Initiative concerning the construction of units as small as two hundred fifty square feet (250 sq. ft.) for seniors applies equally with regard to the Zoning for Quality and Affordability Text Amendment (Z.Q.A.) as well.**
- Zoning for Quality and Affordability (Z.Q.A.) promotes a greater density, floor area, height, and number of units for senior affordable housing projects throughout the City of New York. Such an allowance has adverse consequences for a proper enjoyment of air, light, and living space along with its reversal of the value of local contextual zoning efforts.**
- Zoning for Quality and Affordability (Z.Q.A.) encourages the first-time and unparalleled utilization of a heretofore proscribed use by sanctioning the erection of multiple dwelling units labeled “Continuing Care Retirement Communities” (C.C.R.C.) in R-1 and R-2 Single-Family Districts without any stipulation for affordable housing. The consequence of this feature, which is without precedent, will be structures of greater height and overall number of units. Adding to the objectionable nature of this proposal is that such C.C.R.C.’s, despite the affirmations of the New York City Department of City Planning (N.Y.C.D.C.P.) that they are not being developed “as-of-right,” need authorization solely from the New York City City Planning Commission (N.Y.C.C.P.C.), a proviso that bypasses the Uniform Land Use Review Process (U.L.U.R.P.) that provides for review by local Community Boards, Borough Presidents, Borough Boards, and the New York City Council.**
- The New York City Department of City Planning (N.Y.C.D.C.P.) itself certified the Draft Environmental Impact Statement (D.E.I.S.) for Zoning for Quality and Affordability (Z.Q.A.). This undertaking should have been the purview of an independent, third-party entity as N.Y.C.D.C.P. is not a disinterested party in the approval of the suggested Z.Q.A. Text Amendment. Hence, the statements made earlier relative to the Environmental Impact Statement (E.I.S.) connected with Mandatory Inclusionary Housing (M.I.H.) Initiative also**

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apply in this instance -- *viz.*, that the Department has ensnared itself in an ostensible conflict of interest, if not an actual one.

- Furthermore, also with regard to the Draft Environmental Impact Statement (D.E.I.S.), it gives no indication of how Zoning for Quality and Affordability (Z.Q.A.) will bear upon such issues as infrastructure in impacted neighborhoods. While silent on the topic of how Z.Q.A. will meaningfully advance the construction of affordable housing and how many actual affordable units will be generated as a product of this Initiative, the D.E.I.S. utters nary a comment, too, relative to the manner in which new development spawned by Z.Q.A. will environmentally impact the public health, the safety, and the quality of life of all New Yorkers.
- In addition to the above-stated beliefs pertaining to the unwelcome repercussions of your HOUSING NEW YORK Text Amendments upon contextual zoning successes realized in Bronx Community District #12, it must equally be noted that the changes in contextually zoned areas engendered by Zoning for Quality and Affordability (Z.Q.A.) are for aesthetic and enhanced visual purposes only and do not, in any consequential fashion, contribute to a growth in the quantity of affordable housing units.
- Community Board #12 (The Bronx) proposes that the goal of more affordable housing in the City of New York can be achieved by reliance upon already existing Municipal and State programs that (1) seek to preserve presently existing affordable housing units -- *i.e.*, the Article 8-A Loan Program; (2) create low-interest loans for the building of more affordable housing -- *i.e.*, New York City Housing Development Corporation (N.Y.C.H.D.C.) bonds; and strategies that underwrite rent support, stabilization, and subsidization.

Community Board #12 (The Bronx) avers that it wholehearted concurs with the Municipal Administration's worthy and necessary objective to increase the availability and to insure the excellence of affordable and senior housing. The means to this end are that with which the Community Board takes exception. Notwithstanding the lofty goals sought, the burdens imposed by the proposed methods to realize these aims and the detrimental repercussions engendered by the methods recommended cannot be abided. Community Board #12 will support any affordable housing initiative that takes into consideration and respects the ensuing principles:

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- **The employment of City-based and of minority and women-owned businesses must be specified and statistically verified as must the payment of a living wage to labor and of incentives to house our Veterans.**
- **Any affordable housing initiatives must uniformly and proportionately impact all Community Boards in all five (5) Boroughs of New York City.**
- **All reviews, such as the Environmental Assessment Statement (E.A.S.) and the draft or final Environmental Impact Statement (E.I.S.) must be compiled by independent, third-party outfits extrinsic to the New York City Department of City Planning (N.Y.C.D.C.P.) in order to preclude a conflict-of-interest or the appearance thereof.**
- **Affordable housing development must not diminish the number of currently mandated spaces for parking.**
- **The elimination of local planning input by Community Boards, Borough Presidents, and Borough Boards by the creation of new-fangled “as-of-right” uses or by authorizations to develop solely on the basis of approval from the New York City City Planning Commission (N.Y.C.C.P.C.) must not be enacted.**
- **Local planning participation by Community Boards, Borough Presidents, and Borough Boards must not be constrained and reduced by a “one-size-fits-all” approach to neighborhood planning that inhibits or prohibits the singular contributions to be made by Community Boards and Borough Presidents due to their comprehension and estimation of the particular characteristics and needs of localities and of how planning amendments will shape them.**
- **No multiple housing development must occur in R-1 and R-2 Single Family Zones.**
- **Where it has been enacted, contextually-zoned Districts must not be impaired by “as-of-right” uses that eliminate structural height limitations, side and/or back yards, or contemporary Floor Area Ratio (F.A.R.) requirements.**
- **The construction of affordable units of less than four hundred forty square feet (440 sq. ft.) is to be prohibited unless specifically promoted and sanctioned by the local Community Board and the appropriate Borough President.**

In conclusion, Your Honor, I express the disappointment of my colleagues in the family of New York City Community Boards relative to the mode in which your HOUSING NEW YORK Initiatives were forwarded to us by the New York City Department of City Planning (N.Y.C.D.C.P.). The mammoth magnitude of the papers and the documents to be absorbed merited way more than the sixty (60) days afforded to us and simultaneously to our five (5) Borough Presidents. Indeed, lumping review of the Text Amendments by the Community Boards and the Borough

**The Honorable Bill de Blasio
Mayor of the City of New York
27 November 2015
Page Eleven (11)**

Presidents into a single, sixty-day period, was ill-chosen, ill-timed, and insensitive to local constituencies. Borough Presidents should have been afforded a separate and further sixty-day evaluation period subsequent to that of Community Boards. Since HOUSING NEW YORK entails issues and aspirations so wide-reaching, novel, and essential to the people of a great City, there is no need to rush to judgment, hurtling headlong into a new zoning paradigm *via* “document dump” and absent prudent reflection and sober evaluation.

I thank you for your kindness in considering the extensive comments contained in this correspondence and trust that they will contribute to formulating a concluded and comprehensive program to build and to maintain affordable and senior housing in the City of New York that is satisfactory and agreeable to all.

With respect,


**FATHER RICHARD F. GORMAN, ESQ.
Chairman**

**pc The Honorable Letitia A. James, Public Advocate for the City of New York
The Honorable Scott M. Stringer, Comptroller of the City of New York
The Honorable Ruben Diaz, Jr., Borough President of The Bronx
The Honorable Eric L. Adams, Borough President of Brooklyn
The Honorable Gale A. Brewer, Borough President of Manhattan
The Honorable Melinda R. Katz, Borough President of Queens
The Honorable James S. Oddo, Borough President of Staten Island
All Members of the Council of the City of New York
All Members of the New York City Planning Commission (N.Y.C.C.P.C.)
All New York City Community Boards
Files: Mayor, City Planning, land Use, Correspondence**



COMMUNITY BOARD NO. 1

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**HON. ERIC L. ADAMS
BROOKLYN BOROUGH PRESIDENT**



**RABBI ABRAHAM PERLSTEIN
FIRST VICE-CHAIRMAN**

**DEL TEAGUE
SECOND VICE-CHAIRPERSON**

**STEPHEN J. WEIDBERG
THIRD VICE-CHAIRMAN**

**MARIA VIERA
FINANCIAL SECRETARY**

**ALMA SAVOIA
RECORDING SECRETARY**

**PHILIP A. CAPONEGRO
MEMBER-AT-LARGE**

**DEALICE FULLER
CHAIRPERSON**

**GERALD A. ESPOSITO
DISTRICT MANAGER**

**HON. STEPHEN T. LEVIN
COUNCILMEMBER, 33rd CD**

**HON. ANTONIO REYNOSO
COUNCILMEMBER, 34th CD**

December 2, 2015

Mr. Carl Weisbrod, Director
NYC Department of City Planning
22 Reade Street
New York, NY 10007-1216

**RE: Zoning for Quality & Affordability
Text Amendments.
ULURP No. N160049ZRY**

Dear Mr. Weisbrod:

This is to officially notify you that this recommendation supersedes any previous notices implied or otherwise concerning Brooklyn Community Board No. 1's recommendation for the proposed Zoning for Quality and Affordability Text Amendments (ULURP No. N160049ZRY).

At the regular meeting of Brooklyn Community Board No. 1 held on December 1, 2015, the board members reviewed the report from the Land Use, ULURP & Landmarks Committee (dated 11-10-15) and supported the committee's recommendations regarding the text amendments.

Kindly be advised that Brooklyn Community Board No. 1's membership voted to conditionally approve the Zoning for Quality & Affordability Text Amendments proposal with the following recommendations:

- (1) The city would be given adequate power to extend the time that the senior residences must remain affordable; and

(2) There would not be a decrease in the allowance of distance between buildings. The committee felt there should be 60' between buildings, especially where there is significant overlap; and

(3) The parking requirements for senior housing would be decreased at most by 50%. There would not be any decrease in the parking requirements for affordable units.

The vote was as follows: 26 "YES"; 1 "NO"; 0 "ABSTENTIONS".

Working for a Better Williamsburg-Greenpoint.

Sincerely,

A handwritten signature in cursive script that reads "Dealice Fuller".

Dealice Fuller
Chairperson

DF/mbw

cc: Brooklyn Borough President Eric L. Adams
Council Member Stephen Levin
Council Member Antonio Reynoso



CITY OF NEW YORK
Community Board No. 2

350 JAY STREET - 8TH FL.
BROOKLYN, N.Y. 11201

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DEPARTMENT OF
CITY PLANNING

NOV 25 2015

BROOKLYN OFFICE

ERIC ADAMS
Borough President

SHIRLEY A. M^CRAE
Chairperson

ROBERT PERRIS
District Manager

November 20, 2015

Carl Weisbrod, Chairman
New York City Planning Commission
22 Reade Street
New York, New York 10007

Dear Chairman Weisbrod:

Brooklyn Community Board 2 (CB2) has reviewed and made a determination on two zoning text amendments proposed by the Department of City Planning (DCP), Zoning for Quality and Affordability (N 160049 ZRY) and Mandatory Inclusionary Housing (N 160051 ZRY).

On November 10, 2015, Community Board 2 voted unanimously (37-0-0) to recommend approval of the Mandatory Inclusionary Housing text amendment.

On the same date, CB2 voted 32 in favor, six opposed, one abstention (32-6-1) to recommend disapproval of the Zoning for Quality and Affordability (ZQA) text amendment. The community board believes ZQA has many good attributes. However, the CB2 Land Use Committee and the board as a whole felt there are too many different facets to the text amendment.

More specifically, Community Board 2 was concerned that the language in ZQA was not deterministic enough, that it facilitated the possible construction of better designed and more affordable housing but did not require developers to do so.

At several times during the community board's review, members commented that they would like to see ZQA revised, repackaged and brought back in another form. I encourage the City Planning Commission to direct DCP to take that action. Thank you for the opportunity to comment.

Sincerely,

Shirley A. M^CRae

cc: see following page

DEPARTMENT OF CITY PLANNING
CITY OF NEW YORK
OFFICE OF THE CHAIRMAN
100 NASSAU ST., 12TH FLOOR
NEW YORK, NY 10038
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Carl Weisbrod, Chairman
New York City Planning Commission
November 20, 2015
Page 2

cc: Hon. Eric Adams
Brooklyn Borough President
Hon. Stephen Levin
Hon. Laurie Cumbo
New York City Council
Winston Von Engel, Brooklyn Borough Director
Alex Sommer, Planner
Department of City Planning

SAM^C:RP



The City of New York
Community Board No. 3
Bedford Stuyvesant Restoration Plaza
1360 Fulton Street, 2nd Floor ■ Brooklyn, New York 11216

718-622-6601 Phone ■ 718-857-5774 Fax ■ bk03@cb.nyc.gov E-Mail

ERIC ADAMS
BOROUGH PRESIDENT

TREMAINE S. WRIGHT
CHAIRPERSON

HENRY L. BUTLER
DISTRICT MANAGER

**Community Board #3BK. Meeting
November 2, 2015
ULURP, Housing Land Use Committee Report**

Zoning for Quality and Affordability Recommendation Summary

- Require/Amend/Modify Building Height Limitations
- Require/Amend/Modify Parking Requirements
- Amend/Modify to Maintain Character of Community

HEIGHT LIMITATIONS

Maximum Height Limitation for Quality Housing Buildings-

Lower the height in 7A (e.g. Bedford Ave) and 7D Districts (e.g. Fulton St) as follows:

7A Districts -75ft/7 stories and 7D Districts- 85ft/8 stories.

Modify Height and Setback Regulations for Quality Housing Buildings-Affordable Housing Bonus as follows:

7A Districts -85ft/8 stories and 7D Districts-105ft/10 stories.

PARKING

Required Accessory Off-Street Spaces for Senior Residences:

Modify elimination of group parking to reduction of 50%.

Waiver of Requirements of Small # of spaces in 7A districts:

Reduce Waiver from 15 to 5.

Reduction of (market rate unit) Parking Spaces in Transit Zone to Facilitate Affordable Housing and Senior Housing:

Define surrounding area for available parking as up to 1,000 ft. and must be considered by BSA as well as proximity to public transportation.



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BOROUGH PRESIDENT

TREMAINE S. WRIGHT
CHAIRPERSON

HENRY L. BUTLER
DISTRICT MANAGER

Transit Zone:

One half mile from the G train is considered within a transit zone, albeit infrequent service and typically requiring transfer. This may not be viable.

MAINTAINING CHARACTER

Affordable Independent Residences for seniors:

Require agreement to low income for 30 years.

Quality Housing Buildings Lot Coverage:

Retain 80% building lot coverage instead of 100% coverage.

Affordable Independent residences for Seniors FAR:

Adjust the FAR on narrow streets to 4.0, and 4.6 for inclusionary housing.

Special Provisions for Shallow Lots and Rear Yard Equivalent for quality Housing:

This way you provide a degree of relief without the need for a variance.

Permitted Obstructions in Rear Yards and Equivalents:

Regulate rear one-story building enlargements.

Standard Minimum Distance between Two Buildings on a Single Zoning Lot:

Adjust for greater maximum between buildings with certain considerations.

Community Board No. 4
1420 Bushwick Avenue, Suite 370
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Julie Dent - Chairperson
Nadine Whitted - District Manager

BUSHWICK

ELECTED OFFICIALS

HON. ERIC ADAMS
Borough President

HON. ANTONIO REYNOSO
34th Council District

HON. RAFAEL ESPINAL
37th Council District

OFFICERS

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1st Vice Chairperson

VICTORIA FERNANDEZ
2nd Vice Chairperson

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Correspondence Secretary

ROBERT CAMACHO
Parliamentarian

November 30, 2015

City Planning Commission
Calendar Information Office
22 Reade Street Room 2E
New York NY 10007

To Whom It May Concern:

At the Wednesday, November 18, 2015 meeting and Public Hearing of Brooklyn Community Board #4 the full board voted yes on the Department of City Planning zoning text amendments with the following provisions.

MANDATORY INCLUSINARY HOUSING TEXT AMENDMENT N 160051 ZRY

1. Expedite the process of strengthening enforcement provisions because permanent is a long time.
2. Widen income bands so that the 60% average AMI does include 40% within the same and even lower so that there is a true average and a wide range within that average not just people earning 80% of AMI.

ZONING FOR QUALITY & AFFORDABILITY TEXT AMENDMENT N160049 ZRY

Community Board #4 continues to seek a rezoning to better reflect existing building heights combined with height limited designated areas for growth to provide for permanent affordable housing opportunities. Community Board #4 gives consideration to some of the benefits and precautions that would be necessary to be in place with eventual successful rezoning.

Affordable Independent Residence for Seniors Being Retained as a Resource

Community Board 4 is concerned that, but for zoning bonus enables floor area, there would be no obligation mechanism to prevent the conversion of affordable independent residences for seniors to market rate housing occupancy beyond the terms of its regulatory agreement (minimum of 30 years according to zoning definition for affordable housing). This is despite generous additional floor area and height, and relaxed parking requirements when compared to market rate housing. *Community Board 4 seeks for the zoning text to deter affordable independent residences for seniors from being converted to market-rate housing by providing the City an opportunity to provide operating subsidies to extend the regulatory period*

Height of Affordable Independent Residences for Seniors in R4 and R5 Zoning Districts

As Community Board 4 is seeking a rezoning to better reflect existing building heights combined with height-limited designated areas for growth. There are some blocks in Bushwick that might be candidates for R4 and/or R5 zoning designations. Community Board 4 is concerned that City Planning is proposing for both affordable independent residences for seniors and for long term care facilities to be as tall as six-stories (up to 65 feet) in R4 and R5 districts at a distance of 25 feet from the street line, as such height would be permit uncharacteristic height on block with two- to three-story homes.

Community Board 4 seeks to have the height for affordable independent residences for seniors and long term care facilities be limited to 4 stories or 45 feet in R4 Districts (1.29 FAR) and 5 stories or 55 feet in R5 Districts (1.95 FAR) so that these buildings would be less uncharacteristic with the existing two-to three-stories homes.

Height of Avenue Buildings Next to Adjacent Side Street Buildings

As Community Board 4 is seeking a rezoning to better reflect existing building heights combined with height-limited designated areas for growth. There are many mid-blocks in Bushwick that might be candidates for row-house R4B, R5B and R6B zoning designations. When these districts are adjacent to R6A and R7A Districts, the height of the Avenue building is restricted for the 25 feet next to the row-house districts to 35 feet in R4 and R5 Districts and 50 feet in R6B. City Planning is proposing to increase these heights to 75 feet. Community Board 4 is concerned that this modification goes totally against the intent of the many neighborhood-wide contextual preservation-based rezoning where the community supported increased density in appropriate locations.

Community Board 4 seeks a rejection of this proposed text modification

Height for Quality Housing Buildings In Inclusionary Housing Districts Where No Affordable Housing is Being Provided

Community Board 4 has an Inclusionary Housing Designated Area where the Rheingold Brewery was once located where the developer is able to build to a height of 80 feet whether or not the development includes affordable housing. If the buildings were constructed without providing for affordable housing the buildings would have about 15 percent less permitted floor area than non-Inclusionary Housing designated areas which permit the same height of 80 feet. Community Board 4 believes there is no need for the Rheingold site to accommodate a building 80 feet in height without providing for affordable housing less since it would be providing less floor area than similarly zoned non-designated areas.

Community Board seeks to reduce the maximum height of the building to 65 feet (not more than six-stories) in the R6A District and to 70 feet (not more than seven-stories) in R7A Districts unless the second floor meets the proposed height standard of at least 13 feet above the ground. If the second floor is sufficiently elevated, the height could be 70 feet in R6A and 75 feet in R7A

Height for Quality Housing Buildings In Voluntary and Mandatory Inclusionary Housing Districts Where Affordable Housing is Provided and for Affordable Independent Residences for Seniors

City Planning is proposing for the R7A zoned areas of the Rheingold rezoning area to permit a height of 100 feet (ten stories) with an additional five feet if the second floor is elevated. These heights would also pertain to future mandatory R7A upzoning of Bushwick. Community Board 4 would like to accommodate the affordable housing floor area though is

concerned that the maximum height and number of stories being proposed is too excessive of an increase to ensure accommodation of the Inclusionary Housing designated area permitted floor area. Community Board 4 believes such height undermines what the contextual height limits of Rheingold and would result in less community acceptance of upzoning.

Community Board 4 seeks to reduce the increase of the maximum height of the building to 90 feet (not more than nine-stories) in R7A Districts unless the second floor meets the proposed height standard of at least 13 feet above the ground. If the second floor is sufficiently elevated, the height could be 95 feet.

Corner Lot Coverage for Quality Housing Buildings

City Planning is proposing to allow residential buildings at corners to coverage the entire lot, in lieu of the existing 80 percent maximum coverage rule. Community Board 4 is concerned that promoting 100 percent lot coverage provides too much flexible which might result in substandard room layouts without containing any windows or with lot line only windows that could be blocked one day or having lot line windows adjacent to neighboring back yard. These so called offices and dens would not meet light and air standards for living and sleeping rooms.

Community Board 4 seeks to retain the 80 percent corner lot provision, except for sections of corner lots with lot width not exceeding 30 feet which may have 100 percent coverage.

Shallow lots and Shallow through Lots

City Planning is proposing to change the definition of what is a shallow lot from 70 feet to 95 feet in depth and 190 feet to define a shallow with the intent towards quality design and achieving permitted floor area without the need to obtain a Variance from bulk provisions. Community Board 4 is concerned that such change would result in building extensions that would altering the character of the collective rear yards of the block.

Community Board 4 seeks enable more lots to qualify as shallow though less intrusive as proposed by recommending increasing the standard of 70 feet to a new standard of 80 feet and shallow street-to-street lots be defined by 180 feet as means to provide a degree of relief without the need for a Variance.

Required Accessory Off-Street Parking Spaces for Existing Affordable Independent Residences for Seniors

The proposal would allow existing affordable independent residences for seniors to remove now required group parking lots in Community District 4. Community Board 4 is concerned that applying the elimination of parking requirements to existing affordable independent residences for seniors does not reflect the utilization residents, employees, frail elderly traveling providers, etc.) of these accessory group parking facilities and might result in a quality-of-life impact for the residents of surrounding blocks by displacing the existing off-street parking as it would result in added competition for on-street parking on surrounding streets.

Community Board 4 seeks to modify by limiting the as-of-right reduction of the number of parking spaces in such existing group parking to fifty percent unless the resulting parking waiver would otherwise permit the elimination of such parking requirement.

ZR 25-261 Waiver of Requirements for Small Number of Spaces for R7A Districts and ZR 25-33 Waiver of Requirements for Spaces below Minimum Number for Permitted Non-Residential Uses

As Community Board 4 is seeking a rezoning to better reflect existing building heights combined with height-limited designated areas for growth. Though Community Board 4 is concerned that these higher density zoning districts contain a more permissive waiving of any parking requirements for development not exceeding 30 market-rate residences, as

compared to the current standard of no parking required for ten or less apartments. For community uses, the requirement to have parking would jump from 25 or more parking spaces to at least 40 spaces before parking would be required. Community Board 4 believes this would be too many units of market rate housing to not provide parking and would negatively affect quality-of-life when it comes to long-time residents retaining the ability to find street parking.

Community Board 4 seeks to retain for Community Districts 4 the R6 residential waiver of up to five spaces for market-rate residential development and less than 25 spaces for community facility developments for its R7A Districts.

Special Permits to Reduce the Number of Parking Spaces

- Market-rate for developments containing affordable housing (Board of Standards and Appeals)
- Existing parking spaces for income restricted housing units and for affordable independent residences for seniors (BSA)
- Large scale development (City Planning Commission)

Community Board 4 is concerned that findings do not adequately define a distance to what might be considered the surrounding area and do not take into account the availability of parking as an adverse effect

Community Board 4 seeks to define the surrounding area as up to 1,000 feet and for consideration for the availability of parking in the surrounding area and the proximity of public transportation as addition factors in determining the amount of parking spaces to reduce or waive.

After much consideration, the board felt that the aforementioned is a positive move toward the housing needs for our community in the future.

Respectfully,

Nadine Whitted

Nadine Whitted
District Manager



BROOKLYN COMMUNITY BOARD 5

THE CITY OF NEW YORK

ERIC ADAMS, BOROUGH PRESIDENT
 ANDRE T. MITCHELL, BOARD CHAIRMAN | WALTER CAMPBELL, DISTRICT MANAGER

"ONE COMMUNITY, ONE VOICE"

November 30, 2015

Application # C 160035 ZMK. The application was **disapproved** on November 18, 2015 at Community Board # 5 regular meeting with the following twelve (12) Modifications/Conditions:
 Vote: # In Favor: 0 # Against: 17 # Abstaining: 6

Application # N160036ZRK. Disapproved with Modifications/Conditions:
 Vote: # In Favor: 0 # Against: 17 # Abstaining: 6

Application # N160050ZRK. Disapproved with Modifications/Conditions:
 Vote: # In Favor: 0 # Against: 17 # Abstaining: 6

Application # N160037HUK. Disapproved with Modifications/Conditions:
 Vote: # In Favor: 0 # Against: 17 # Abstaining: 6

Application # N160042HDK. Disapproved with Modifications/Conditions:
 Vote: # In Favor: 0 # Against: 17 # Abstaining: 6

Modifications/Conditions:

1. The community does not want a storage facility on the corner of Pitkin and Pennsylvania Avenue also known as block 3721, lot 1.
2. The community would like to reclaim the Old Traffic Court building known as 127 Pennsylvania Avenue, corner of Liberty Avenue also known as block 3687, lot 1. The Community Board office is located in the building and the community would like to see this building restored to a recreation facility for community use. Approximately three million dollar is needed to repair the build. This would increase productivity and moral for community board members and staff to effectively address the economic development needs of the community. Additionally, community residents would benefit from this investment.
3. The community would like for the city to acquire the Long Island Railroad sub-station building located at Atlantic Avenue (service road) and Snediker Avenue. This building is location on block 3680. This building will be used as a Cultural Center for the residents of East New York and Brownsville.

4. We would like a CUNY campus in the rezone area. This would allow for long-term economic sustainability for all of East New York and neighboring communities.
5. We would like an Innovation Lab – a job-placement and training center run in conjunction with New York City College of Technology and local business organizations that would train young people to do basic computer coding; and helps locals start small cooperative businesses; and help find jobs for adults.
6. We would like approximately \$20 million dollars or more investment from NYC Economic Development Corporation (EDC) in East New York for Business Incubators in the IBZ and Innovation Labs throughout Community Board #5 (Note: 2014 EDC invested \$316,396 in East New York). This much needed investment would address the high unemployment in CB#5.
7. We need a 30 year Tax-Credit for long-term East New York homeowners and businesses to ease the property tax burden due to rezone changes.
8. The City should finance the creation of lower cost rental space for local small businesses.
9. We need multi-year, robust support for strengthening local business focusing training and business planning, including topics such as purchasing properties, meeting increased and differing demands for services and preparing your business for changes, etc.
10. We want to make sure that the merchants in the community request is in placed which is: assistance in the preservation/repair of mixed use properties and down-payment assistance made available to support local businesses in buying mixed-use buildings.
11. We need a City commitment to save East New York manufacturing and provide relocation fund for industrial businesses that need to relocate.
12. We need a City commitment to create good living wage jobs for East New York residents in construction and manufacturing and other growth sectors.

Mandatory Inclusionary Housing and Zoning for Quality and Affordability Disapproved.

Mandatory Inclusionary Housing: N160051ZRY

In Favor: 6 # Against: 16 # Abstaining: 1

Zoning for Quality and Affordability: N160049RFX

In Favor: 8 # Against: 15 # Abstaining: 1



THE CITY OF NEW YORK **COMMUNITY BOARD SIX**

Eric Adams
Borough President

Gary G. Reilly
Chairperson

Craig Hammerman
District Manager

November 27, 2015

Carl Weisbrod
Chairperson
City Planning Commission
120 Broadway, 31st floor
New York, New York

Dear Chairperson Weisbrod:

I am writing to advise you that at its November 10, 2015 general meeting Brooklyn Community Board 6 resolved by a vote of 21 in favor, 8 against with 2 abstentions to conditionally approve of the proposed Zoning for Quality and Affordability (ZQA) text amendment (ULURP No. N1600049ZRY).

In a separate action, we also resolved by a vote of 24 in favor, 5 against with 2 abstentions to conditionally approve of the proposed Mandatory Inclusionary Housing (MIH) zoning text (ULURP No. N160051ZRY).

Our primary basis for supporting these actions is rooted in an acknowledgement that we must do more to keep our City affordable for everyone. And while the debate continues on how best to do this, and by no means do we feel that these proposed zoning actions present a perfect solution, they at least begin to move us from discussion to action. They are a starting point, not an end unto themselves. By voicing our support we are also expressing a desire to remain engaged in the conversation moving forward.

We hope you will consider and incorporate our conditions to the greatest degree possible. We arrived at them through thoughtful and constructive deliberation which involved several presentations by the department, an extremely well-attended public hearing sponsored by our Land Use committee on October 22, 2015, and many opinions expressed to us by civic groups, special interest groups and members of the public.

Zoning for Quality and Affordability (ZQA) text amendment (ULURP No. N1600049ZRY)

We want to acknowledge that the revision of your original proposal did a lot to move this in what we believe was a positive direction. Limiting the allowable height bonus on the ground floors in

our district to five feet, from what was originally proposed as a range of five to fifteen feet, was more in keeping with the built form of our existing housing stock. The contextual zoning in place here, which we lobbied long and hard to get, was done to protect the built form. And it is not uncommon for brownstone buildings in our district to be constructed with taller floors at the parlor level. Allowing a five foot height bonus at the ground floor is generally in keeping with the spirit of our urban design features.

We still reserve some mild concern about how and whether the proposed text amendment could undermine elements of our contextual zoning, because the shape of our buildings is such an important signature characteristic in many of our neighborhoods, but we find that offering the ground floor height bonus—limited to five feet—gives developers more options to build closer to our actual built form. The current rezoning imposes restrictions that make it more difficult to achieve the building envelopes we actually want to see.

Our condition on the ZQA action relates to the proposed designation of our entire Community District as a “Transit Zone.” We generally have favored the City’s taking a more refined approach to parking requirements as we find that the existing regulations encourage the creation of a surplus of off-street parking spaces which, we believe, can ultimately do more to harm than good for a community. To put a finer point on the proposal to include us in the Transit Zone, however, we must dispute the underlying assumption that our entire district has equal and convenient access to good transit options. We suggest that our Red Hook neighborhood is in fact a transit-challenged community. The Department of City Planning has conducted its own studies on this basis; so we know we aren’t telling you something you don’t already know. To that end, as a condition for our support, we ask that the proposal be modified to exclude Red Hook from the Transit Zone designation for our district.

Mandatory Inclusionary Housing (MIH) zoning text (ULURP No. N160051ZRY)

On the MIH proposal we have several conditions because some of the proposal’s elements left us uneasy as currently written. Part of our uneasiness lies in the fact that there are still aspects of this proposal which have not as yet been solidified such as the “Payment in Lieu of Participation” option described more fully below. We believe some further refinements and adjustments are in order and suggest the following for further consideration.

First, we understand the concept behind offering developers a “Payment in Lieu of Participation” option and while some people believe that mandatory inclusionary housing should in fact be mandatory, on balance we believed that offering such an option does make sense but that there needed to be more accuracy and fairness in the value-basis on which such payments would be calculated. As currently conceived we understand that payment formulas are still being worked out but that developers would likely be assessed based on construction cost differentials. We assert that this would be letting the developers off on the cheap and, instead, that such values should be based on such factors as the construction costs, present value of projected profits, and even the value of any zoning changes which may be an essential part of a developer’s proposal. Considering these factors as a basis would, to us, be a much fairer way of assessing payment options for developers.

Second, the current proposal would allow for the construction of off-site housing to satisfy the mandatory inclusionary housing component. Allowing off-site affordable housing development, to us, means that developers would then have the option of building rich and poor buildings. They could building rich buildings in areas with good public transit options, good school districts and access to healthy and nutritious food markets. They could also build poor buildings in areas, perhaps even within a stone's throw of the rich building, that would have lesser transit options, lesser performing schools and starved for healthy food. We do not think that developers should have the option of constructing off-site affordable housing units. This proposal must seek to integrate not aggravate the segregation we are already challenged by in this City.

Lastly, we continue to experience a high degree of skepticism whenever the term affordable is used. Affordable, yes, but affordable for whom? Since we are all-too-familiar with how the use of the Federal definition of Area Median Income fails to adequately and accurately depict real-life living conditions in New York City, we are challenging you to come up with a better model, a better definition that includes integration and diverse income levels as an overarching goal. Lower income residents should not be hurt by this proposal. They must be protected.

Thank you for your attention and consideration in this matter. We stand ready to continue this conversation and welcome the opportunity for further dialogue.

Sincerely,

/ S /

Gary G. Reilly
Chairperson

cc: Hon. Bill de Blasio
Hon. Eric Adams
Hon. Steve Levin
Hon. Carlos Menchaca
Hon. Brad Lander
Winston Von Engel, Director, DCP/Brooklyn
Community Boards Citywide



THE CITY OF NEW YORK
BOROUGH OF BROOKLYN
COMMUNITY BOARD #7

Daniel A. Murphy
Chairperson

Jeremy Laufer
District Manager

Eric Adams
Borough President

November 24, 2015

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

Re: Zoning for Quality and Affordability - ULURP #N160049ZRY
Mandatory Inclusionary Housing – ULURP #N160051ZRY

Dear Chairman Weisbrod:

Community Board 7/Brooklyn voted on the Zoning for Quality and Affordability (ZQA) and Mandatory Inclusionary Housing (MIH) proposals at our Board Meeting on November 18. We had previously held a public hearing on November 9 and an information session on ZQA in the spring.

Our Board Members voted to oppose ZQA by a vote of 2 – in favor, 27 – opposed, with 5 – abstentions. Our Board Members were very skeptical of ZQA's benefits for our local community and its current residents. Many Board Members and residents spoke about our community's efforts to rezone almost all of our residential community in the 1980s, 2005 and 2009. The contextual districts that were created from these efforts had maximum heights limits, which were the main impetus for rezoning. However, our community recognized the need for trade-offs for limiting the height of most of the community and agreed to upzoning 4th and 7th Avenues. Non-mandatory inclusionary housing was included on these avenues, but to our knowledge, these resulted in zero new affordable units. We heard from many residents that these efforts would have been a wasted effort if just a few short years later we allow an additional five to twenty feet to our already limited building heights. It has been brought up that the R7A zone in Greenwood Heights was set so as to protect the view corridor from the Statue of Minerva in Green-Wood Cemetery to the Statue of Liberty. Additional height, even of just a few feet would breach the view corridor.

While much of the plan is focused on creating additional senior housing, certainly a laudable goal, our community has a younger population than NYC's average and, while we need additional senior housing, the need for family-sized units in our community is much more prevalent. Additionally, many questioned the need for bay windows, courtyards and façade articulation for affordable units as they would add to the cost of the units. It was believed that these enhancements would be limited strictly to attract renters who would pay a higher rate, not local residents.

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Much of the argument in opposition to ZQA focused on the lack of infrastructure enhancements within the plan. Our community already has severely overcrowded schools, overburdened traffic and transportation networks, water and sewer systems that have not been upgraded in decades and a significant deficit of public space, especially parks. This plan does not address these needs. If ZQA will result in new residents in our community, the population increase will further burden these systems without a plan or budget to alleviate these conditions. It would be insulting to current residents to suggest that money can be found for these problems if we agree to a change to the zoning resolution, busting limits we recently set. One should not depend on the other. This is a universal proposal that does not take the specific needs of communities into account.

Finally, many members of the public were very concerned about reducing the number of parking spaces required for new buildings and stated that the community already lacks adequate parking. It is feared additional residents without private parking options will make public parking much more difficult for all. We do not believe DCP has accurate statistics of car ownership in our community as we were informed that records were obtained from the State Department of Motor Vehicles. This does not take into account the high percentage of vehicles registered out of state. It is ludicrous to pretend these vehicles don't exist.

Our Board Members saw few tangible benefits of ZQA for the local community and even the potential for exacerbating current problems and voted overwhelmingly against the motion.

With regard to Mandatory Inclusionary Housing, our Board Members voted 15 – in favor, 11 – opposed, with 8 – abstentions. Although a plurality of members voted in favor of MIH, the proposal did not receive a majority of votes, as is required, in order to be approved by the Board. As no position received a majority vote, *we have not taken a position on this matter.*

While many of our Board Members found MIH to have laudable goals, there were again significant questions as to the benefit for the local community.

In addition to height, many were concerned that new units would not be available for local residents. Area Median Income, which includes counties outside of New York City, is more than twice CB 7's median income. Although rates may be set at 80%, 60% or even 40% of AMI, many believe these rental costs would still be too high for the local community. The idea that there would be little if any benefit for the local community was further entrenched by a lawsuit currently challenging set-asides for the local communities, which might rule such benefits unconstitutional.

The local community's median income of just under \$44,000 is less than 60% AMI proposed (for 25% of residential floor area). This would mean more than half of our population would be eligible for these units, but they would only occupy 25% of the floor area of the building. This would continue a significant deficit of affordable units locally and a suspicion that the vast majority of new units would not be built for local residents.

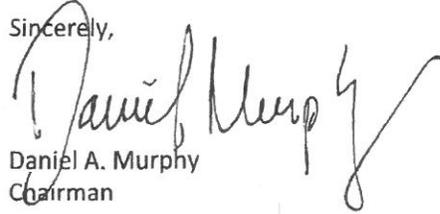
It was also discussed that affordable units could be built offsite and bunched, concentrating poverty.

Many of the arguments in opposition to both proposals can be attributed to the community's distrust of developers, a failure of the city to follow through on past promises to the community, the lack of availability to local residents, a continued overburdening of local infrastructure and distrust in the city's ability to crack down on illegal construction activities. The goals of ZQA and MIH are laudable, but the

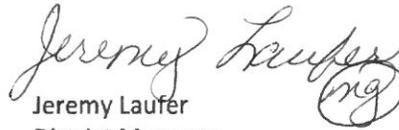
majority of our Board Members believe that they would not achieve these goals in our community. In fact, some argued that they would further the pace of gentrification.

We hope you take our community's concerns into account as these proposals are considered.

Sincerely,



Daniel A. Murphy
Chairman



Jeremy Laufer
District Manager

cc: Elected Officials



COMMUNITY BOARD NO. 8

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Eric Adams
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November 25, 2015

Nizjoni Granville
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Michelle T. George
District Manager

OFFICE OF THE
CHAIRPERSON

DEC 3-2015
29018

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New York, NY 10271

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Executive Director
NYC Department of City Planning
120 Broadway, 31st Floor
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Mr. Winston Von Engel
Director, Brooklyn Borough Office
NYC Department of City Planning
16 Court Street
Brooklyn, NY, 11241

Re: ULURP No. N160049 ZRY - DCP Mandatory Inclusionary Housing (MIH) [ZR §23-154, paragraph (d) Text Amendment; and Citywide Zoning for Quality and Affordability (ZQA) ULURP No. N160049ZRY, CEQR No. 15DCP104Y

Dear Chief City Planners,

This letter is to request your close attention to the conditions Community Board 8 (CB 8) has placed on its support for the two above cited projects.

Support for MIH

At its November 12, 2015 meeting, CB 8 voted 30 in favor, two against, and one abstention to support the MIH project. Board members are concerned that the MIH will be ineffective in achieving its purpose unless requirements for accountability are included. Accountability measures must insure that: offsite affordable units are built on a predetermined schedule and within Community District (CD) 8; that the number of apartments and the rents are monitored for compliance; and that penalties are imposed for non-compliance.

CB 8 recognizes the value of permanent affordability as compared to rent control and rent stabilization where the numbers of apartments in the programs are shrinking from vacancy decontrol, and poor compliance where new apartments not being registered with DHCR.

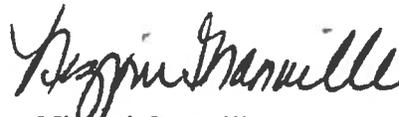
Conditions for Supporting ZQA

At its November 12, 2015 meeting, CB 8 voted 24 in favor, four against, and one abstention against supporting the ZQA project unless the conditions attached to this letter are included for CD 8. The conditions ask DCP to carefully construct its plan for CD 8 so that these hastily formulated amendments do not wreak havoc on the lives of current residents. For example, the plan needs adequate regulatory agreements governing senior residences, and the specifics of corner lot coverage are needed; as are adequate techniques for measuring height above grade. Long-term care facilities should not be allowed on row-house blocks. CD 8 should not be part of the Transit Zone that would permit developers to omit off-street parking from larger projects. The backyard spaces providing light and air should be protected. The conditions also ask for changes that are not included in the DCP project, including side yards for new buildings abutting residential properties.

Your assistance is requested in addressing the conditions identified by CB 8 as delineated in the attachment to this letter. Comments made at CB 8's 11/12/15 meeting are also included herewith. It is our hope that DCP will apply the attention to particular details needed for a proposal as complex and far-reaching as ZQA. Similarly, the success of MIH will depend on DCP and HPD conceptualizing and effectuating plans for monitoring and enforcement, including meaningful penalties, from the outset.

We look forward to working closely with DCP to refine these proposals so that they achieve their stated goals.

Sincerely,



Nizjoni Granville
Chairperson

Attachment: Brooklyn CB 8 Conditions for Supporting Citywide Proposal
ULURP No. N160049ZRY Zoning for Quality and Affordability, 11/12/2015

cc:

Hon. Robert Cornegy
Hon. Laurie Cumbo
Hon. Darlene Mealy
Hon. E. Adams

Vicki Been, Commissioner, HPD
R. Bearak, Dir. Land Use, BBP 's Office
E. Tyus, CB 8 Housing/ULURP

Comments on MIH and ZQA at CB 8 11/12/2015 General Meeting

Atim Oton asked what AHND's (the Association for Housing and Neighborhood Development say) conclusion to the MIH plan was. She was informed by Ms. Tyus that the paper is suggesting that most development would be eligible for as of right 421-A, which is 35 years of affordability, not permanent as the Mayor claims in his proposal.

Mr. Dupree asked why the plan skips around income brackets. He specifically asked about the people that fall in between brackets. Dan Moran of HPD responded by stating that one of the features of MIH is income averaging and not just targeting certain people in an effort to get to as many levels and incomes as possible. Ms. Tyus also stated that for many years, this CB has asked that we use the average median income for this community district. The AMI is set on the federal level for the entire metropolitan area so it's skewed on the high side.

Leroy Reid inquired about employment opportunities for minorities in the housing being built. Mr. Moran stated that HPD created a program where in all of the affordable housing developments, they have asked the developers to go to Workforce 1 to get participants that could become employees.

Gib Veconi asked DCP to clarify whether or not there is a dependency between MIH and ZQA. There does not appear to be, but if there is, it needs to be spelled out. A representative from DCP did not directly answer the question but stated that DCP did extensive outreach when all of the proposals were identified 6 months ago. All the problems identified have been known for many decades. Building construction technology has evolved since 1961 and 1987 when the codes were last updated with the exception of zoning changes. These two plans seek to add some new breath to zoning law. HPD's Mr. Moran stated that they were 2 independent proposals.

Adam Sachs stated that the income levels and brackets cut off certain people. He asked if the units could be offered to other incomes. He was informed that units are offered across the band to get the average of 60% or 80% depending on which of the 3 plans is chosen. Different family sizes are also targeted to add as many strata as possible.

Sanmati Naik from DCP stated that the problem is that housing options are small. We cannot sit back and not do anything at all. The Housing New York plan has many initiatives to address the housing crisis and all of the initiatives are serving the same goals. MIH ensures that a percentage of housing is set aside for affordable housing permanently.

Mr. Witherwax asked if the averaging is how things are done now or if the averaging will only be brought about by MIH. He gave examples, asking is there can be someone with 150% AMI balancing someone with 120%? Mr. Moran stated that the cap is 120% with 60% band or 130% with the 80% band.

Liz Grefrath stated that nothing requires the developer from averaging and asked if they could just do 60%. She was informed that a developer could just do 60%, but that DCP is encouraging averaging because from a marketing standpoint, it would look better to have units at a range of incomes.

Ms. Tyus suggested that DCP take into account information from ANHD, which did a very well, deep, rich study on financial feasibility in the draft that is saying, for the production of this

proposal, AMI's under 60% in the areas that need it greatest were not studied. DCP only studied the 60-90% bracket. She asked how the rents asked will be monitored. A sufficient answer was not given to her question.

Mr. Mensah asked how the AMI is recorded. He was informed that it is recorded by family size.

Curtis Harris expressed his dissatisfaction with the proposal, stating that a lot of people are not approving the proposal. He brought up the fact that DCP acknowledged that developers could pay a fine and not have to provide affordable housing. He asked if there was a concrete amount that would be asked for as the fine and was told that there was not at this time. Mr. Harris went on to state that Crown Heights is saturated with developers and minorities are being priced out of the community. The stats say that 78% of the community is minority. We need to represent the interest of the constituency. Mr. Moran stated that what he is describing is displacement and gentrification. Right now, there is no requirement for developments to provide affordable housing. MIH provides a level of protection against displacement.

Diana Foster pointed out that no study was done concerning feasibility of AMI under 60% and asked why one was not studied. She further asked if the people making under 60% of the AMI should not be eligible for housing. DCP stated that the target is 60% because it is the average. Developers can break 20 units down into 10 units available at 30% Ami and the other 10 units at 90% AMI, which would create the 60% AMI average that is being sought. This is the reason the income bands were created so that a wider range of incomes could be reached.

Mr. Atkins asked, if 60% is the base level being used, what commissions and regulations were used to establish this as the baseline? He continued by stating that the people being pushed out were the ones here first because no one else wanted to be here. He urged DCP to take a closer look at the baseline. Ms. Naik stated that the city retains experts to make sure 60% is not an arbitrary decision. She reminded everyone that we have to realize we are talking about private property, not city property, and that the program has to match certain standards. One of the questions asked during the creation of the proposal was what AMI would make the program work and it was found to be 60%.

A resident stated that she noticed some unintended consequences of the averaging. She asked, if you have someone at the higher end of the AMI and they leave their unit, does that make the unit set aside for the high end permanently? She was informed by Mr. Moran that the 120% or 130% would be offset by someone with a very low AMI. HUD sets AMI standards and the numbers do change over time.

Yahya Raji asked if the proposal was for property rental or homeownership, because at these AMI's it would be difficult to get a mortgage. He was informed that it would most likely be rental properties.

Mr. Veconi made a motion that the full board support the MIH proposal being put forward with guidance that the city work toward affordability levels for markets that are at deeper affordability levels than are currently proposed and to make more units affordable in any particular development in MIH sites. The proposal results in additional influence for CB to act more in its advisory capacity. 2nd by Ms. Tyus

Mr. Mensah asked what the consequences are if we do not support this. He was informed that we would have nothing in place requiring affordable units.

Gail Branch Muhammad stated that she is not trusting that MIH will happen even if we support it.

Audrey Taitt-Hall asked what does landmark preservation means in terms of MIH since much of the district is landmark preserved. Ms. Tyus informed her that much of the land along the edges along the historic districts will be the area that is focused on, not the landmarked areas.

Ms. Oton stated that at this point, we have nothing. This is a start for a beginning of dialogue with city council members.

30, 2, 1

ZQA:

Mr. Veconi stated that the 2 main components to this that would add additional height factor amongst most contextual zones of 5 feet or 10 feet as of right and, even more, 25 feet in the inclusionary zones along Franklin Avenue to add the 20% affordable housing in the existing envelope. From our perspective, we would be voting for an additional 25 feet in the R7A zone. It does not seem we have to give the extra 25 feet away in the zone. He is not confident that the additional 5 feet in all of our contextual zones will encourage better looking development. Ms. Naik stated that she appreciates the observations. There was a theme of architects, city planners, developers, and others, that found that floor to ceiling heights in commercial space of 8'8" was not high enough. We see all the time that there is no privacy for ground floor residents. The new buildings are like boxes. Zoning is in part responsible for the boxy appearance. Raising the floor by 3 feet gives more privacy to ground floor residents. ZQA gives for a few feet of horizontal flexibility that makes for a better streetscape.

Ms. Oton stated that the fact that this entire proposal was put together and brought to CBs in such short span of time basically says you have no interest in communities. This administration is an embarrassment because it has not really heard communities. You failed to ask communities what they would like first. As someone that came from the architectural industry, this is disrespectful. Ms. Naik stated that ZQA might not go as far as you would like, but it is an improvement over what is. Another DCP rep stated that this proposal was brought for public review in March 2015 for review. DCP extended the comment period from 30 days to 60 days. DCP and the City Council will hold public hearings on the items.

Mr. Witherwax thanked the Housing/ULURP Committee for coming up with 23 comments/criticisms in such a short time on ZQA. He stated that this proposal is not good enough and unlike with MIH where not good enough is better than nothing. He will not support the initiative as is.

Ms. Grefrath stated that a lot of buildings are going to be built and people are going to be living in them. After a while with 8'8" inches as your ceiling height, you start to feel closed in. She also stated that she can see into many living rooms and kitchens while walking down any given street with a new development and elevating ground levels is very important. Developers usually put

the lower incomes on the ground levels and these tenants require some consideration as well as market rate tenants.

Mr. Staton congratulated the committee for voting on this amendment. He stated that the proposal is not static; there will be public hearings for additional comments and concerns to be expressed.

Ms. Benn-James stated that the city recently had a house auction last month. She questioned why the city didn't they turn those buildings into affordable housing rather than auctioning them off to developers. Mr. Maron informed her that HPD has a host of properties that is all affordable rates.

Ms. Tanenbaum stated that one of the issues raised last week was the issue of seniors and parking. She informed DCP that they missed an opportunity when they looked at seniors and the parking issue, and that are not quite capturing the real experiences of seniors. She expressed concern that seniors will become isolated if you take away the parking spaces even though they don't themselves own the vehicle because they rely on people with vehicles to take care of them. There is a long gray area where seniors need people that have cars.

Phu Duong stated that as an architect, there are incentives for developers to take on some of the suggestions. The higher ceiling heights encourage opportunities to have more shops with better ventilation. He referenced sitting in a restaurant and exiting smelling like the restaurant. However, he cautioned that ZQA, in allowing for higher elevations, might impact commercial rentals and cause higher rents to be charged for commercial spaces. Yes, it will allow for a better street life and street experience, but those are two separate experiences that could be better presented.

Ms. Tyus added to the parking discussion that the reason DCP removed parking from the plan is the perceived wealth of public transportation in the district. If you're a senior living near Atlantic Avenue and need to go to the IRT subway on Eastern Parkway, it would be a long uphill trek. She stated that she would like DCP to remove CB 8 from the transit hub.

Mr. Atkins stated that we have focused too much on certain ages and are forgetting that we represent people from birth to death. All age ranges should be taken in consideration.

Mr. Sachs stated that parking is a very touchy subject. His understanding of the proposal is that it would remove parking on site but not off-street. There is a certain dollar figure that it costs developers to provide off-street parking in the development. By removing the parking requirement, it allows developers to create units at deeper affordability.

Ms. Oton added that when you add 25 feet of height on Franklin Avenue, it blocks out the sun. You will have great ground floor levels but no sun.

Mr. Witherwax made a motion not to support ZQA as proposed unless it incorporates the 23 conditions. 2nd Atkins.

25,4,1

**Brooklyn CB 8 Conditions for Supporting Citywide Proposal
ULURP No. N160049ZRY Zoning for Quality and Affordability
11/12/2015**

1. ZR 12-10 Affordable independent residences for seniors

BCB 8 seeks assurances that additional floor area and relaxed parking requirements for affordable independent residences for seniors only be approved pursuant to a permanent or at least long-term regulatory agreements greater than 30 years requiring occupancy by low income households. *BCB 8 seeks to prevent affordable independent residences for seniors from being converted to market-rate housing without first giving the City the opportunity to provide operating subsidies.*

2. ZR 23-153 Quality Housing Buildings Corner Lot Coverage

BCB 8 is concerned that the maximum residential lot building coverage for a corner lot would be 100 percent, in lieu of the existing 80 percent provision, without regard to lot width. BCB 8 believes that such design flexibility promoted by 100 percent lot coverage could promote substandard room layouts/proximity to windows, including so called offices and dens that would not meet light and air standards for living and sleeping rooms. Additionally, existing residents, who have lot line windows, will experience a diminution of their light, air and property value. *CB8 seeks to retain the 80 percent corner lot provision especially for sections of corner lots with lot width not exceeding 30 feet.*

3. ZR 23-155 Affordable independent residences for seniors Floor Area Ratio

BCB 8 is concerned that the residential floor area for R7A was increased to 5.01 without regard to whether the district is mapped on wide or narrow streets. *BCB 8 seeks for narrow street frontages, such as Lincoln Place to retain 4.0 FAR.*

4. ZR 23-156 Special lot coverage provisions for shallow lots in R6-R10 Districts, ZR 23-52 (b)(2) Special Provisions for Shallow Interior Lots, ZR 23-533 Required rear yard equivalent for Quality Housing buildings and ZR 23-534 Special Provisions for Shallow Through Lots R6-R10 Districts (NO)

BCB 8 is concerned that changing the shallow lot definition from 70 feet in depth to 95 feet and 190 feet to define a shallow through lot is overly permissive for City Planning's goal of encouraging quality design within permitted floor area without the need for a Variance from bulk provisions. This change will result in larger rear yard enlargements altering the character of the collective rear yards of a block, colloquially called "the doughnut hole." There are sections of blocks in CD 8 that are not characterized by the standard block width of 200 feet, where lots are consistently 80 or 90 feet in depth with yard character well-defined that will be compromised by more liberal lot coverage if the existing shallow lot standard is increased from 70 feet to 95 feet of depth. *BCB 8 seeks for shallow lot provisions to remain at 70 feet to 80 feet and shallow through lots be defined by 145 feet to 160 feet to as means to provide a degree of relief without the need for a Variance.*

5. ZR 23-44 (b)(9) Permitted Obstructions in Required Yards or Rear Yard Equivalents in R6A and R7A Districts

BCB 8 is concerned that permitting rear enlargements up to 15 feet in height for one-story buildings is an inappropriate intrusion for the character of the collective rear yards (doughnut holes) where R6A and R7A Districts are mapped along narrow street widths. *BCB 8 seeks for zoning lots located in an R6A or R7A District that front along narrow streets to be regulated consistent with R6B, R7B and R8B Districts, where such rear yard intrusions would not be applicable according to the proposed text.*

6. ZR 23-462 Side yards for all other buildings containing residences

R5 R6 R7 R8 R9 R10

Given the rapid development in BCB 8, in the districts indicated, the concern is for those homes abutting lots where new buildings are contemplated. Quality zoning should include provisions for sideyards for new buildings to preserve the light and air for current and new residents

7. ZR 23-631 (f) General Provisions Height and Setback Requirements in R5D Districts and ZR 23-662 Maximum height of buildings and setback regulations R6-R10 Districts for Quality Housing buildings

BCB 8 is concerned that as a point of reference for measuring building height, the level of the adjoining sidewalk in relationship to the base plane requires a spatially specific term for zoning lots with sloped frontages. The finished floor of the second story above grade as measured from the level of the adjoining sidewalk is proposed as a means to establish the maximum height of a building provided as a reference point in order to achieve the additional five feet of building height. *BCB 8 seeks to establish the measurement from legal grade of the base plane or some equivalent standard.*

8. ZR 23-641 Front setbacks in R6-R10 Districts without a letter suffix, corresponding table Maximum Height of Front wall and Required Front Setbacks, ZR 23-642 Alternate Front Setbacks and corresponding table Alternate Required Front Setbacks

BCB 8 is concerned that the level of street line is an ill-defined reference term for zoning lots with sloped frontages to identify where the determination of maximum height is measured from as a means to establish such height. *BCB 8 seeks to establish the measurement from legal grade of the base plane or some equivalent standard.*

9. ZR 23-662 (b) Maximum height of buildings and setback regulations R6-R10 Districts for Quality Housing buildings, building heights and number of permitted stories and corresponding Table 1 Minimum Base Height, Maximum Base Height, Maximum Building Height and Maximum Number of Stories for Contextual Districts and for Non-Contextual Districts

BCB 8 is concerned that the maximum height and number of stories is not reduced for R6-R10 Districts where such districts are in accordance with the provisions of Inclusionary Housing designated areas. Such designated areas have typically 11 to 16 percent less permitted floor area ratios than non-Inclusionary Housing designated areas, therefore there is no need to accommodate less provided floor area in the same height as non-designated areas. BCB 8 is in agreement with the Brooklyn Borough President that **the City should be leveraging the financial value of upper floors as an additional incentive to participate in the Inclusionary Housing Program. Holding back one to four stories**

(depending on district) of now permitted height unless the affordable housing bonus is used – as views have value -- turns added height into a financial incentive to participate in the incentive program. BCB 8 seeks to adjust corresponding Table 1 as it pertains to Maximum Height of Building with non-qualifying ground floor/Maximum Height of Building with qualifying ground floor/Maximum Number of Stories as follows: R6A 65/70/6; R7B 65/65/6; R7A 75/80/7; and R7D 90/95/9; and comparable provisions for equivalent non-contextual districts.

10. ZR 23-664 (a) Modified height and setback regulations for certain buildings R6-R10 Districts for Quality Housing buildings providing affordable housing pursuant to the Inclusionary Housing Program and Table 1 Modified Maximum Base Height and Maximum Building Height for Certain Quality Housing Buildings

BCB 8 is concerned that the maximum height and number of stories is proposed to be excessively increased in the intent to accommodate the Inclusionary Housing designated area permitted floor area ratio (FAR) and as a result undermines community led efforts to impose contextual height limits in areas rezoned to promote housing development as part of neighborhood-wide contextual rezoning that included contextual preservation-minded rezoning. BCB 8 seeks to adjust corresponding Table 1 as it pertains to Maximum Height of Building with non-qualifying ground floor/Maximum Height of Building with qualifying ground floor/Maximum Number of Stories, i.e.: R7A 90/95/9.

11. ZR 23-693 Special Height Limitations Special provisions applying adjacent to R1 through R6B Districts for R6-R10 districts

BCB 8 is concerned that the proposal intends to modify the height permitted within 25 feet when R6-R10 districts abut R1 through R6B Districts (such as Prospect Heights) from 35 feet in R1 through R5 Districts and R6B requirements (50 or 55 feet) for R6B Districts to a height of 75 feet. BCB 8 believes that this modification goes totally against the intent of the many neighborhood-wide contextual preservation-based rezonings where the community supported increased density in appropriate locations. BCB 8 seeks a rejection of this proposed text modification.

12. ZR 23-711(b)(1) Standard Minimum Distance Between Two or More Buildings on a Single Zoning Lot R3-R10 Districts for separated portions of a building above roof of connecting abutting building portion

BCB 8 is concerned that the more minimal standards of the NYS Multiple Dwelling Law are not appropriate for wall condition heights in excess of 50 feet to require not more than 40 feet between walls where legal windows are involved for building walls of undefined length of overlap. Given the expectation of utilizing excess development rights of NYCHA campuses and existing affordable independent residences for seniors, there should be an expectation of quality light and air standards as opposed to provisions that allow less than desirable building placements. BCB 8 seeks a maximum length where distance between building walls of connected buildings exceed 50 feet in height when at least one wall contains legal windows, with a maximum requirement of 60 feet between such building walls.

13. ZR 23-711(b)(2) Standard Minimum Distance Between Two or More Buildings on a Single Zoning Lot R3-R10 Districts for Two or more buildings on a single zoning lot

BCB 8 is concerned that the more minimal standards of the NYS Multiple Dwelling Law to require not more than 40 feet between building walls of undefined length of overlap up to 125 feet in height does not adequately provide for light and air. Given the expectation of utilizing excess development rights of NYCHA campuses and existing affordable independent residences for seniors, there should be an expectation of quality light and air standards as opposed to provisions that allow less than desirable building placements. *BCB 8 seeks a maximum length where distance between buildings up to 125 feet in height when at least one wall contains legal windows, should have a maximum length of overlap within the standard of 40 feet and then require up to a maximum requirement of 60 feet between such building walls.*

14. ZR 24-013 (a)(2) Special provision for certain community facility uses for buildings containing long-term care facilities in R3 through R5 districts except in R3A, R3X, R3-1, R4A, R4B, R4-1, R5A and R5D Districts

BCB 8 is concerned that the proposed as-of-right allowance of provisions for affordable independent residences for seniors could be applicable to long-term care facilities in R5A and R5D zoning districts and potentially result in out-of-context development with an incompatible intensity of use. This includes having provisions for R5A and R5D Districts that preclude uncharacteristic proposed bulk of long-term care facilities on block fronts predominantly developed with row houses without front yard parking featuring landscaped front yards and along narrow streets where such long-term care facilities, which are essentially businesses with a significant employment presence seeking placement in low-density residential areas. *BCB 8 seeks the establishment of provisions consistent with ZR 23-011 regarding the Quality Housing Program where according to ZR 23-011(c)(3), zoning lots occupied by a single, two or three-family row houses without front yard parking featuring landscaped front yards where 70 percent or more of the aggregate length of the block fronts in residential use on both sides of the street facing each other are occupied by such residences. BCB 8 believes that such provision would assure that perfectly-sound homes on such blocks are not demolished to develop such out-of-context facilities. In addition such affordable independent residences for seniors to be applicable to long-term care facilities floor area and bulk envelop should not be applicable to zonings lots exclusively fronting along narrow streets.*

15. ZR 24-164 Special Provisions for Zoning Lots Containing Both Community Facility and Residential Uses Location of Open Space Residential Portion R1-R9

BCB 8 is concerned that the ground floor incentive to allowing building heights to be increased by five feet without adjusting the qualifying rear yard height, which is now up to 23 feet above curb level for meeting the required residential open space requirement upon the roof of the community facility portion of such building, might preclude use of the ground floor incentive or the provision of a two-story of community facility use extending into the rear yard. *BCB 8 seeks to modify the qualifying community facility rooftop residential open space height to 25 feet.*

16. ZR 25-252 Required Accessory Off-Street Parking Spaces for Residences – Modification of Requirements Where Group Parking Facilities Are Required R1-R10 Districts for Affordable Independent Residences for Seniors

BCB 8 is concerned that applying the elimination of parking requirements to existing affordable independent residences for seniors within the transit zone does not reflect the utilization of such accessory group parking facilities and will result in a quality-of-life impact for the residents of surrounding blocks by displacing existing off-street parking with the resultant added competition for on-street parking on surrounding streets. *BCB 8 seeks to limit the as-of-right reduction of the number of parking spaces in such existing group parking to fifty percent or less.*

17. ZR 25-261 Waiver of Requirements for Small Number of Spaces for R7A Districts and ZR 25-33 Waiver of Requirements for Spaces below Minimum Number for Permitted Non-Residential Uses

Given that certain segments of BCD 8 have limited access to mass/rapid transit and are on significant geological inclines between Eastern Parkway and Atlantic Ave, BCB 8 is concerned that the waiving of any parking requirements for development not exceeding 30 residences or where more than 25 parking spaces but not exceeding 40 spaces for community uses is excessive for neighborhoods in sections of BCD 8 where car ownership rates tend to reflect lifestyles and where quality-of-life depends on the ability to find parking. *BCB 8 seeks to modify the residential waiver in certain R7A Districts from 15 spaces to the R6, R7-1 and R7B standard of five spaces and the community facility use waiver from 40 spaces to the R6, R7-1 and R7B standard of 25 spaces.*

18. ZR 28-11 Elevated Ground Floor Units R6-R10 Districts

BCB 8 is concerned that for Quality Housing buildings, excluding up to 100 square feet for each foot above curb level up from the definition of zoning floor area is nearly 40 percent more than necessary to equate the floor space required to comply with ADA ramp and standards, resulting up approximately up to 150 sf of free development rights. *BCB 8 seeks to reduce the exemption to 70 feet per foot.*

19. ZR 73-433 Reduction of (market-rate unit) parking spaces in the Transit Zone to facilitate affordable housing

Given that certain segments of BCD 8 have limited access to mass/rapid transit and are on significant geological inclines between Eastern Parkway and Atlantic Ave, BCB 8 is concerned that finding (c) does not adequately define a distance to what might be considered the surrounding area and does not address searching for parking as an aspect of daily life that would have an undue adverse effect and does not contain similar factors as identified in ZR 73-434 Reduction of existing parking spaces for income restricted housing units for additional safeguards that might be imposed by the Board of Standards and Appeals. *BCB 8 should be excluded from the Transit Zone. Further, BCB 8 seeks to define the surrounding area as up to 1,000 feet and BSA must consider the availability or lack thereof of parking in the surrounding area and the proximity of public transportation.*

20. ZR 73-434 Reduction of existing parking spaces for income restricted housing units and ZR 73-435 Reduction of existing parking spaces for affordable independent residences for seniors

BCB 8 is concerned that finding (c) does not mention finding parking as what might have an undue adverse effect and finding (c) and factors to be considered by the BSA does not adequately define a distance to what might be considered the surrounding area. *BCB 8 seeks to define the surrounding area as up to 1,000 feet.*

21. ZR 73-623 Bulk modifications for Quality Housing buildings on irregular sites

BCB 8 is concerned that existing site planning building placement, accommodation of parking requirements and underbuilding of height that resulted in much underutilization of permitted floor area and not listed as practical difficulties according to finding (b) in order to provide the BSA with more latitude when the ownership remains the same.

22. ZR 74-532 Special Permit Reduction or waiver of parking requirements for accessory group parking facilities by the City Planning Commission in conjunction with large scale development in the transit zone

BCB 8 is concerned that finding (3) does not adequately define a distance to what might be considered the surrounding area and does not mention finding parking as what might have an undue adverse effect and does not give consideration to the availability of parking in the surrounding area and proximity to public transportation. *BCB 8 seeks to define the surrounding area as up to 1,000 feet and the City Planning Commission must consider the availability of parking in the surrounding area and the proximity of public transportation as addition factors in determining the amount of parking spaces to reduce or waive.*

23. Appendix 1: Transit Zone

BCB 8 is concerned that while all of CD 8 is considered to be within the transit zone, access to either subway line can be 10 to 12 blocks away, and is uphill climb if you are walking South. For Community District 8, the rate of gentrification mitigates against removing the minimum parking requirements from any plans for affordable or market rate housing. Provisions for parking should be retained for the benefit of the current residents. *BCB 8 should not be included in the Transit Zone.*



Community/Borough Board Recommendation

Pursuant to the Uniform Land Use Review Procedure

Application #: **N160049ZRY**

Project Name: **Zoning for Quality and Affordability**

CEQR Number: 15DCP104Y

Borough(s): Citywide

Community District Number(s): Citywide

Please use the above application number on all correspondence concerning this application

SUBMISSION INSTRUCTIONS

- Complete this form and return to the Department of City Planning by one of the following options:
 - EMAIL (recommended):** Send email to CalendarOffice@planning.nyc.gov and include the following subject line: (CB or BP) Recommendation + (6-digit application number), e.g., "CB Recommendation #C10000ZSQ"
 - MAIL:** Calendar Information Office, City Planning Commission, Room 2E, 22 Reade Street, New York, NY 10007
 - FAX:** (212) 720-3356 and note "Attention of the Calendar Office"
- Send one copy of the completed form with any attachments to the applicant's representative at the address listed below, one copy to the Borough President, and one copy to the Borough Board, when applicable.

Docket Description:

IN THE MATTER OF an application submitted by The New York City Department of City Planning.
 The Zoning of Quality and Affordability Text Amendment would address the needs of affordable housing, aid efficient use of housing subsidies, and encourage higher-quality residential buildings in the city's medium- and high density neighborhoods.

Applicant(s):

New York City Department of City Planning
 22 Reade Street
 New York, NY 10003

Applicant's Representative:

Beth Lebowitz

Recommendation submitted by:

Brooklyn Community Board 9

Date of public hearing: November 17, 2015

Location: Middle School 61 - 400 Empire Blvd. Brooklyn, NY 11225

Was a quorum present? YES NO

A public hearing requires a quorum of 20% of the appointed members of the board, but in no event fewer than seven such members.

Date of Vote: November 24, 2015

Location: Middle School 61 - 400 Empire Blvd. Brooklyn, NY 11225

RECOMMENDATION

Approve

Approve With Modifications/Conditions

Disapprove

Disapprove With Modifications/Conditions

Please attach any further explanation of the recommendation on additional sheets, as necessary.

Voting

In Favor: 3

Against: 29

Abstaining: 0

Total members appointed to the board: **48**

Name of CB/BB officer completing this form

Demetrius Lawrence

Title

Chairperson

Date

12/8/2015



Community Board Ten

8119 5th Avenue • Brooklyn, NY 11209
(718) 745-6827 • Fax (718) 836-2447
BK10@cb.nyc.gov
www.bkcb10.org

DORIS N. CRUZ
Vice Chairperson
RONALD GROSS
Secretary
GREGORY AHL
Treasurer

BRIAN KIERAN
Chair

JOSEPHINE BECKMANN
District Manager

November 19, 2015

Mr. Carl Weisbrod
Director
New York City Planning Commission
22 Reade Street
New York, NY 10007

Dear Mr. Weisbrod:

At a duly publicized meeting of Community Board Ten held on Monday, November 16, 2015, members voted overwhelmingly to support the recommendation of the Zoning and Land Use Committee regarding the proposed Department of City Planning Text Amendments, Zoning for Quality and Affordability and Mandatory Inclusionary Housing. Community Board 10's adopted statement is attached.

Thank you for your consideration to the Board's concerns. Please do not hesitate to contact me if I can be of further assistance.

Sincerely

Josephine Beckmann
District Manager

JB:dg
-- Att.

cc: Council Member Gentile
R. Jacobs – DCP
CB 10 Zoning and Land Use Committee



Community Board Ten

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ZONING FOR QUALITY AND AFFORDABILITY Brooklyn Community Board 10 Statement ZQA 11/16/15

Few would deny the need for a fair and comprehensive plan that would address the pressing need for affordable and senior housing in New York City. Certainly Community Board 10 recognizes this need. Upon due consideration, within the review time allotted, the Members of Brooklyn Community Board 10 conclude that the Zoning for Quality and Affordability (ZQA) initiative, now before us, is not that plan.

At a duly publicized meeting of Community Board Ten held on November 16, 2015, members voted “no” on the initiative. There were 38 members present with 35 voting in the affirmative; 2 voting against and one recusal.

Community Board Ten holds the vision of maintaining neighborhood character with respect to density and scale. We ascribe to maintaining and enhancing the essential low-scale, sometimes varied, sometimes uniform, streetscape. Neighborhood character, although perhaps an overused and elusive term, is the very reason why existing residents stay and new residents come.

Community Board Ten has long recognized that, although made of bricks and mortar, the character of our neighborhood is nonetheless extremely delicate and can be easily eroded without vigilance.

Density in the built environment requires balance – balance within the capacities of mass transit, balance in the number school seats in safe and well-constructed schools, balance within the capacity of the vehicular streets and pedestrian sidewalk traffic, balance in the containment and removal of garbage, balance with the manpower of the city agencies charged with enforcement and compliance and balance with many other increasingly overburdened aspects of the neighborhood infrastructure, aspects which need to be in place prior to considering increased density.

Scale in the built environment requires control to ensure that buildings work in compatibility side by side with each other and that they contribute to an overall aesthetically and functionally pleasing presence along the streets and sidewalks. Scale can be tempered by architectural detailing and articulation but it is still largely determined by size, height and proximity to adjacent buildings and the street.

Community Board Ten recognizes that our city planning concerns cannot end at our district boundary lines. We are part of NYC as a whole, and share a common destiny with the entire borough and the city. CB10, because of the hard-won contextual zoning applicable in most of the district, would certainly be less impacted by the proposed ZQA than many other areas in the city although our large scale “soft-sites” may still not be adequately protected.

Community Board Ten

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Overall, we disagree with the direction of ZQA and the increased density and scale that will inevitably result, and thus, we disagree, in large part, with the content of the ZQA. We do not concur with the City Planning Commission (CPC) statements that ZQA will not produce dramatic changes in development and that it will not encourage tear-down of existing buildings.

The schedule for this review process was rushed, especially given the broadness and complexity of the amendments. These text amendments were first summarized in the spring, with the official plans not realized until the end of September, giving two months for review. The community boards and the public deserved more time to understand and evaluate these text amendments and given the breath of their hard work on these amendments, even the City Planning Commission itself, deserved that we have more time to consider their proposals.

Nevertheless, ZALUC was assigned a task within a condensed time-frame and found numerous issues that are concerning. Our negative vote is based on many concerns including the following:

Concern that lower density contextual zones would have insufficient control over placement of long term care facilities, yielding incompatible uses and bulk and also without adequate buffering between long-term care facilities and the adjacent residences.

Concern about the proposed height, setback and bulk increases in the non-contextual, low-density zones, altering the essential character of these neighborhoods, which have a predominance of detached and semi-detached existing homes.

Concern that the placement of long-term care facilities, as-of-right, in any detached or semi-detached district, will have a negative impact on existing built communities.

Concern about the increased building heights and setback changes in the higher density residential districts, as well as the elimination of existing provisions, which limit exceedingly tall sliver type of buildings on narrow lots.

Concern, in general, about uncharacteristic proposed bulk of senior housing and care facilities, in that these facilities are also essentially businesses, with a significant employment presence.

Concern about the 100% lot coverage for corner lot buildings in quality housing developments and about changes in the shallow lots regulations, reducing the depth of rear yards.

Concern about allowing rear extensions to fill the rear yard up to 15' in height in denser contextual zones, intruding on the collective rear yards.

Concern about the reduction of minimum distances between two or more buildings, applying a lower standard for light and air for dwelling units and to the increasing of building heights in the transitional areas between divergent zoning districts.

(With respect to PARKING)

Concern about elimination or reductions in parking requirements for new senior development, in all zones, both within and outside the transit zones. The reduction in parking requirements exacerbates overall parking shortages and ignores the parking needs of the facility residents, staff, and visitors.

Community Board Ten

Page – 3 –

Concern about retroactive elimination or reduction in parking requirements with respect to existing residential facilities for seniors, not only with respect to the parking, but more importantly, providing the opportunity for further development on these already densely populated sites.

Concern about elimination or reductions in the parking requirements for new affordable housing and about the retroactive removal of current parking requirements for existing affordable housing, in all zones, both within and outside the transit zones. Similarly for both existing and new senior and affordable housing, we are concerned about any decrease in the number of parking spaces, whether resulting from an increase the parking waiver limits or resulting from reduction in the number of parking spaces currently required.

Even in the transit zones, parking spaces are important to the quality of life, not only for the immediate residents in these zones but also for those living outside the zones who may drive to access public transportation.

Concern that even the architectural quality aspects of the ZQA, that could result in better designed buildings, (aspects such as higher ceiling heights at ground levels, more articulated street facades, more flexible regulations related to setbacks, bay windows and other features typical of the city's older buildings), are merely encouraged by ZQA. These design mechanisms are not set forth as mandatory zoning regulations.

For all of the above reasons, Brooklyn Community Board Ten recommends a NO Vote to the ZQA text amendment currently proposed by the City Planning Commission.

It is our hope that the CPC will revamp the ZQA to the extent necessary to attract widespread support from Community Boards across the city including Brooklyn CB10.



Community Board Ten

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District Manager

MANDATORY INCLUSIONARY HOUSING Brooklyn Community Board Ten Statement MIH 11/16/15

Few would deny the need for a fair and comprehensive plan that would address the pressing need for affordable and senior housing in New York City. Certainly Community Board 10 recognizes this need. Upon due consideration, within the review time allotted, the members of Brooklyn Community Board Ten conclude that Mandatory Inclusionary Housing (MIH) initiative, now before us, is not that plan.

At a duly publicized meeting of Community Board Ten held on Monday, November 16, 2015, members voted “no” on the MIH initiative. There were 38 members present with 36 voting in favor; 1 against and 1 recusal.

Community Board Ten holds the vision of maintaining neighborhood character with respect to density and scale. We ascribe to maintaining and enhancing the essential low-scale, sometimes varied sometimes uniform, streetscape. Neighborhood character, although a perhaps overused and elusive term, is the very reason why existing residents stay and new residents come.

Community Board Ten has long recognized that, although made of bricks and mortar, the character of our neighborhood is nonetheless extremely delicate and can be easily eroded without vigilance.

Community Board Ten recognizes that our city planning concerns cannot end at our district boundary lines. We are part of NYC as a whole, and share a common destiny with the entire borough and the city.

Community Board Ten understands that as of now, the City has no plans to initiate any MIH plans within our boundary; however we cannot predict the future and are mindful of many of our large scale “soft-sites” which do not, as yet, enjoy protections from potential overdevelopment.

Overall, Community Board Ten believes strongly that all new development should include mandatory affordable housing; however, we disagree with the direction of this particular MIH plan and the process leading up to our vote.

The schedule for this review process was rushed, given the broadness and complexity of the amendments. These text amendments were first summarized in the spring; the official plans were not realized until the end of September, giving two months for review. The community boards and the public deserved more time to understand and evaluate these text amendments and given the breath of their hard work on these amendments, even the City Planning Commission itself deserved that we have more time to consider their proposals.

Community Board Ten

Page - 2 -

Nevertheless, Community Board Ten was assigned a task within a condensed time-frame and found numerous issues that are concerning. Our negative vote is based on many concerns including the following:

Concern: MIH will not achieve the affordable housing that this city and its communities need. City Planning described its plan, which although it may very well be the most rigorous of any major U.S. City, may not be rigorous enough for New York City. The plan provides options for percentages of affordable units at either 60% or 80% AMI (average median income) and an additional workforce option for those averaging 120% AMI.

For many communities these options do not take into account a large number of households that make fewer than 60% AMI. For other communities such as Community Board 10, there are many of households that make 130% AMI but are still truly rent-burdened by the Market Rate housing made available to them. AMI is based on income before taxes and does not take into account other economic burdens that face young families such as growing student debt.

In order for MIH to work, developments must have a breakdown of available units that accurately reflect the needs of residents in each Community Board.

Concern: MIH includes provisions that may deter the development of quality affordable housing. The first such provision is the “second building” option. This option allows the affordable housing to be accommodated in a building separate from the market rate housing building. There is nothing within the plan that guarantees consistency in the quality standards between the market rate building and the affordable rate building.

The second provision is the “payment in lieu of” option, which allows developers who do not include affordable housing in a given project, to contribute to a fund which would be dedicated to increasing the number of affordable units elsewhere. The city’s plan on the collection and distribution of these funds is not defined. Although it was explained that HPD would have a role, no details have been provided, and thus no guarantee can be made that the funds can be collected and how the funds will be used. It is also unclear as to whether or not the Community Boards will have a say in how best the funds can serve the community.

The third provision is the opt-out “hardship appeal” which one can make to the BSA. There is no framework at present for an appeal and as in most BSA appeals, the advantage is with the developers and not the Community Board recommendations.

Concern: Any housing developments of 10 units or less would be exempt from mandatory inclusionary housing. This is a problem because since 2000, public records show that about 95,000 units were built citywide in buildings with less than 10 units, out of almost 300,000 units total. That means a third of all the apartments built in the last 15 years would be exempt from mandatory inclusionary zoning. This could greatly reduce the number of affordable housing units built.

Concern: Another concern is the administration of the program. There is no single agency that oversees the process. For example, the NYC Department of Finance dispenses the tax breaks while HPD can revoke them while Rent Stabilization is overseen by a NYS agency, etc.

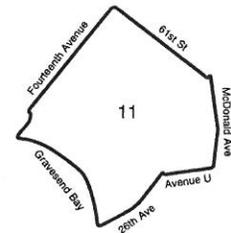
Community Board Ten

Page - 3 -

For all of the above reasons, Brooklyn Community Board Ten recommends a NO Vote to the MIH text amendment proposed by the City Planning Commission. It is our hope that the CPC will revamp the MIH to the extent necessary to attract widespread support from Community Boards across the city including Community Board 10.



THE CITY OF NEW YORK
COMMUNITY BOARD No. 11
2214 BATH AVENUE
BROOKLYN, NEW YORK 11214



WILLIAM R. GUARINELLO
Chairman

November 16, 2015

MARNEE ELIAS-PAVIA
District Manager

Carl Weisbrod, Director
Department of City Planning
22 Reade Street
New York, New York 10007-1216

Re: N 160049 ZRY
Zoning for Quality and Affordability
Text Amendment

Dear Mr. Weisbrod:

At the general meeting of Community Board 11, held on November 12, 2015, a resolution was unanimously adopted approving the Zoning for Quality and Affordability Text Amendment with the following modifications:

ZR 12-10 Affordable Independent Residence for Seniors should not be limited to a 30-year occupancy without the opportunity to review, extend the opportunity for City subsidies to maintain senior housing other than permitting conversion to market-rate housing.

ZR 22-22 – Uses Permitted by Special Permit by the City Planning Commission – Discretionary approval should be extended from R1 and R-2 to the contextual zoning districts for long term care facilities in R4A and R5A detached home districts as of right. In seeking such use be pursuant to a Special Permit or City Planning Commission authorization as a means to provide standards of findings and Community Board input.

ZR 22-42 City Planning Special Permit for Long Term Care Facilities – Opposes the blanket finding that use, scale and placement of long-term facilities would not alter the essential character of the neighborhood in the R4A and R5A detached home districts.

There needs to be adequate buffering from adjacent residences in detached home districts. Such facilities should only be granted by Special Permit of the City Planning Commission upon input from the Community Board.

ZR 23-44 (b)(9) Permitted obstructions in required Yard Equivalents in R6A and R7A Districts

Opposed to the height enlargement in R6A and R7A districts along narrow street widths where resulting loss of rear lots are probable.

ZR23-693 Special Height Limitations Special provisions applying adjacent to R1 through R6B Districts for R6-R10 districts

CB-11 opposes the proposal to modify the height permitted within 25 feet when R6-R10 districts abut R1 through R6B Districts from 35 feet in R1 through R5 Districts and R6B requirements (50 or 55 feet) for R6B Districts to a height of 75 feet. Such modification goes totally against the intent of the many neighborhood-wide contextual preservation-based rezoning where the community supported increased density in appropriate locations.

ZR 24-013 (a)(2) Special provision for certain community facility uses for buildings containing long-term care facilities in R3 through R5 districts except in R3A, R3X, R3-1, R4A, R4B, R4-1, R5A and R5D Districts

The proposed as-of-right allowance of provisions for affordable independent residences for seniors to be applicable to long-term care facilities is too wide-spread for these zoning districts and could potentially result in out-of-context development of incapable intensity of use. *The establishment of provisions consistent with ZR 23-011 regarding the Quality Housing Program where according to ZR 23-011(c)(3), zoning lots occupied by a single, two or three-family detached or semi-detached residence where 70 percent or more of the aggregate length of the block fronts in residential use on both sides of the street facing each other are occupied by such residences. Such provision would assure that perfectly sound homes on such blocks are not demolished to develop such out-of-context facilities. In addition, such affordable independent residences for seniors to be applicable to long-term care facilities floor area and bulk envelop should not be applicable to zonings lots exclusively fronting along narrow streets.*

ZR 25-252 Required Accessory Off-Street Parking Spaces for Residences – Modification of Requirements Where Group Parking Facilities Are Required R1-R10 Districts for Affordable Independent Residences for Seniors

Opposed to the elimination of the as of right reduction in its entirety.

ZR 25-261 Waiver of Requirements for Small Number of Spaces for R7A Districts and ZR 25-33 Waiver of Requirements for Spaces below Minimum Number for Permitted Non-Residential Uses

Opposed to any reduction in the parking space requirements or increase in any waivers.

Appendix 1: Transit Zone

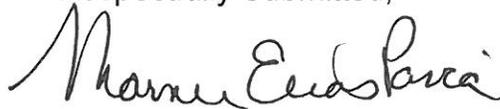
CB 11 opposes the inclusion of the district in a transit zone. The designation of transit zones does not adequately reflect the need for parking and the current parking situation due to development and illegal curb cuts/front yard parking.

Furthermore, City Planning should undertake a study to determine the scope and impact of illegal curb cuts and front yard parking.

Regarding ZR 101-51 (a) Minimum Parking Requirements for Off-Street Parking Regulations

Opposed to the parking reduction by maintaining minimum parking requirements for structures within its boundaries.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "Marnee Elias-Pavia". The signature is fluid and cursive, with the first name being the most prominent.

Marnee Elias-Pavia
District Manager

NYC PLANNING
 DEPARTMENT OF CITY PLANNING CITY OF NEW YORK

Community/Borough Board Recommendation
 Pursuant to the Uniform Land Use Review Procedure

Application # **160049 ZRY**

Project Name: **Zoning for Quality & Affordability**

Borough(s): **Brooklyn**

CEQR Number:

Community District Number(s): **12**

SUBMISSION INSTRUCTIONS

- Complete the form and return to the Department of City Planning by one of the following options:
 - EMAIL (recommended):** Send email to CommunityPlanningNYC.gov and include the following subjectline: (CB or BR) Recommendation # (5-digit application number), e.g., "CB Recommendation #C100002SQ"
 - MAIL:** Calendar Recommendation Office, City Planning Commission, Room 2E, 22 Rector Street, New York, NY 10007
 - FAX:** (212) 720-3356 and note "Attention of the Calendar Office"
- Send one copy of the completed form with any attachments to the applicant's representative at the address listed below, one copy to the Borough President, and one copy to the Borough Board, when applicable.

Docket Description:
IN THE MATTER OF an application on Zoning for Quality and Affordability. (See attachment)

Applicant(s): Department of City Planning

Applicant's Representative: Jonah Rogoff

Recommendation submitted by: Community Board 12

Date of public hearing: Location:

Was a quorum present? YES NO

A quorum is defined as a majority of the appointed members of the board. Not to exceed more than seven board members.

Date of vote: November 24, 2015

Location: **Albino Sandoz Center - 5201 - 30th Avenue, 3rd Floor**

RECOMMENDATION

Approve Disapprove

Approve With Modifications/Conditions Disapprove With Modifications/Conditions

These attach any further explanation of the recommendation or additional details, as necessary.

in Favor of Applicant & Rezoning: **3**

Total members reported to the board: **30**

Name of CEQR officer completing this form: **Barry Spitzer**

Title: **Chief Manager**

Date: **12/17/2015**

NYC PLANNING
 DEPARTMENT OF CITY PLANNING CITY OF NEW YORK

Community/Borough Board Recommendation
 Pursuant to the Uniform Land Use Review Procedure

Application #: **160051 ZRY**

CEQR Number: _____

Project Name: **Mandatory Inclusionary Housing**

Borough(s): **Brooklyn**

Community District Number(s): **12**

PLEASE USE THE ABOVE APPLICATION NUMBER ON ALL CORRESPONDENCE CONCERNING THIS APPLICATION

1. Complete this form and return to the Department of City Planning by one of the following options:

- EMAIL (recommended):** Send email to CalendarOffice@planning.nyc.gov and include the following subject line: (CB or BP) Recommendation + (6-digit application number), e.g., "CB Recommendation #C10000ZSO"
- MAIL:** Calendar Information Office, City Planning Commission, Room 2E, 22 Reade Street, New York, NY 10007
- FAX:** (212) 720-3358 and note "Attention of the Calendar Office"

2. Send one copy of the completed form with any attachments to the applicant's representative at the address listed below, one copy to the Borough President, and one copy to the Borough Board, when applicable.

Applicant(s): Department of City Planning

Applicant's Representative: Jonah Rogoff

Recommendation submitted by: _____
 Community Board 12

Date of Public Hearing: _____
 Location: _____

Was a quorum present? YES NO

A quorum consists of a majority of 25% of the appointed members of the board and in no event fewer than seven (7) members.

Date of Vote: November 26, 2015
 Location: Metro Center - 5901 - 13th Avenue, 5th Floor

RECOMMENDATION

Approve Disapprove

Approve With Modifications/Conditions Disapprove With Modifications/Conditions

These check any further explanation of the recommendation on additional sheets, as necessary.

Winning: In Favor: 26 Against: 2 Abstaining: 2

Total members appointed to the board: **50**

Name of CB or BP officer completing the form: _____
 Title: _____
 Date: 12/1/2015

Docket Description:
 IN THE MATTER OF an application on Mandatory Inclusionary Housing. (See attachment)



BROOKLYN COMMUNITY BOARD 13
1201 Surf Avenue – 3rd Fl., Brooklyn, NY 11224
(718) 266-3001 FAX (718) 266-3920
<http://www.nyc.gov/html/bkncb13/html/home/home.shtml>

ERIC ADAMS
Borough President

STEPHEN MORAN
Chairperson

EDDIE MARK
District Manager

Dec. 7, 2015

Kerensa Woods
Department of City Planning

Please be advised that at the November meeting of Brooklyn Community Board 13, held on November 18, 2015 the board voted as follows with quorum present:

Mandatory Affordable Inclusionary Housing:

Motion: Community Board 13 rejects the Mandatory Affordable Inclusionary Housing Text Amendment.

VOTE: In Favor: 26 Opposed: 0 Abstentions: 1

Zoning for Quality and Affordability Text Amendment:

Motion: Community Board 13 rejects the Zoning for Quality and Affordability Text Amendment.

VOTE: In favor: 25 Opposed: 0 Abstentions: 2

If you need any further information, please contact me at the number listed above.

Best Regards,

Eddie Mark
District Manager
Brooklyn Community Board 13



Community/Borough Board Recommendation

Pursuant to the Uniform Land Use Review Procedure

Application #:	Project Name:
CEQR Number:	Borough(s):
	Community District Number(s):

Please use the above application number on all correspondence concerning this application

SUBMISSION INSTRUCTIONS

- Complete this form and return to the Department of City Planning by one of the following options:
 - EMAIL (recommended):** Send email to CalendarOffice@planning.nyc.gov and include the following subject line: (CB or BP) Recommendation + (6-digit application number), e.g., "CB Recommendation #C100000ZSQ" ~~XXXXXXXXXX~~
 - MAIL:** Calendar Information Office, City Planning Commission, Room 2E, 22 Reade Street, New York, NY 10007
 - FAX:** (212) 720-3356 and note "Attention of the Calendar Office"
- Send one copy of the completed form with any attachments to the applicant's representative at the address listed below, one copy to the Borough President, and one copy to the Borough Board, when applicable.

Docket Description:

Applicant(s):		Applicant's Representative:	
Recommendation submitted by:			
Date of public hearing:		Location:	
Was a quorum present? YES <input type="checkbox"/> NO <input type="checkbox"/>		<i>A public hearing requires a quorum of 20% of the appointed members of the board, but in no event fewer than seven such members.</i>	
Date of Vote:		Location:	
RECOMMENDATION			
<input type="checkbox"/> Approve		<input type="checkbox"/> Approve With Modifications/Conditions	
<input type="checkbox"/> Disapprove		<input type="checkbox"/> Disapprove With Modifications/Conditions	
Please attach any further explanation of the recommendation on additional sheets, as necessary.			
Voting			
# In Favor:	# Against:	# Abstaining:	Total members appointed to the board:
Name of CB/BB officer completing this form		Title	Date



Community/Borough Board Recommendation

Pursuant to the Uniform Land Use Review Procedure

Application #:	Project Name:
CEQR Number:	Borough(s): Community District Number(s):

Please use the above application number on all correspondence concerning this application

SUBMISSION INSTRUCTIONS

- Complete this form and return to the Department of City Planning by one of the following options:
 - EMAIL (recommended):** Send email to CalendarOffice@planning.nyc.gov and include the following subject line: (CB or BP) Recommendation + (6-digit application number), e.g., "CB Recommendation #C100000ZSQ" ~~XXXXXXXXXX~~
 - MAIL:** Calendar Information Office, City Planning Commission, Room 2E, 22 Reade Street, New York, NY 10007
 - FAX:** (212) 720-3356 and note "Attention of the Calendar Office"
- Send one copy of the completed form with any attachments to the applicant's representative at the address listed below, one copy to the Borough President, and one copy to the Borough Board, when applicable.

Docket Description:

Applicant(s):	Applicant's Representative:
Recommendation submitted by:	
Date of public hearing:	Location:
Was a quorum present? YES <input type="checkbox"/> NO <input type="checkbox"/>	<i>A public hearing requires a quorum of 20% of the appointed members of the board, but in no event fewer than seven such members.</i>
Date of Vote:	Location:
RECOMMENDATION <input type="checkbox"/> Approve <input type="checkbox"/> Approve With Modifications/Conditions <input type="checkbox"/> Disapprove <input type="checkbox"/> Disapprove With Modifications/Conditions	
Please attach any further explanation of the recommendation on additional sheets, as necessary.	
Voting # In Favor: # Against: # Abstaining: Total members appointed to the board:	
Name of CB/BB officer completing this form	Title
Date	

ERIC ADAMS
Brooklyn Borough President

FR added

VIOLA D. GREENE-WALKER
District Manager



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BETTIE KOLLOCK-WALLACE
Chairperson

E-mail: bk16@cb.nyc.gov
Website: www.brooklyncb16.org

November 30, 2015

City Planning Commission
Calendar Information
22 Reade Street, Room 2E
New York, New York 10007

Re: N160049ZRY
Zoning for Quality and Affordability Text Amendment

Dear Commissioners:

At a public meeting held on November 24, 2015, Community Board #16 voted to disapprove with modifications/conditions the above subject application as follows 0-in favor, 24-against, and 4-abstentions with a total membership of 44.

I. ZR 22-22 and ZR 22-23 Maximum Size of Dwelling Units

Brooklyn Community Board #16 is concerned that the dwelling unit size minimum has been eliminated from affordable independent residences for seniors. While this revision is intended to create affordable residences specifically for seniors, eliminating this maximum can lead to small units that are unsuitable for living and substandard designs for a particularly vulnerable population. *The Community Board seeks to include some minimum guidelines for developing affordable independent residences for seniors.*

II. ZR 22-42a City Planning Commission Special Permit for Long-Term Care Facilities

Brooklyn Community Board #16 is concerned that the Commission can authorize long-term care facilities as long as the proposed facility "will not impair the essential character of the surrounding area" and that "an adequate buffer exists." These terms are subjective until able to be defined and do not make for guidelines that will be easily followed. *The Community Board seeks a definition of "essential character" or a process in which the CPC will define the*

essential character of a surrounding area, and a more elaborate explanation on the meaning of an "adequate buffer."

III. ZR 23-153 For Quality Housing Buildings & ZR 23-156b.2 Special lot coverage provisions for certain interior or through lots

Brooklyn Community Board #16 is concerned that corner lots in R6-10 districts will have 100%, up from the previous 80%. Using the entire corner lot for residential developments will result in building designs and room layouts that will decrease the quality of life for residents, especially concerning air and light. *The Community Board seeks to maintain the 80% lot coverage maximum of developments on corner lots.*

IV. ZR 23-632b Required side and rear setbacks

Brooklyn Community Board #16 is concerned with the elimination of rear yard setbacks for affordable independent residences for seniors. As opposed to other buildings or structures, affordable senior residences have been singled out to not need rear yard setbacks. This extra provision of light and space in rear yards are equally important for senior residences. *The Community Board seeks to maintain the rear yard setback of one half the height of the building that will be applied to other residential districts.*

V. ZR 23-641 Front setbacks in R6-R10 Districts without a letter suffix, corresponding table Maximum Height of Front wall and Required Setbacks ZR 23-642 Alternate Front Setbacks and corresponding table Alternate Required Front Setbacks

Brooklyn Community Board #16 is concerned that the reference for measure of a building's ground floor height is not an accurate measurement for all buildings. Using the adjoining sidewalk as a reference to measure up the minimum 13 feet does not reflect the differences in building designs, especially of ground floors that do not begin at grade with the sidewalk. *The Community Board seeks to establish the measurement from the ground floor's legal base plane or some equivalent standard.*

VI. ZR 23-664a Modified height and setback regulations for certain buildings R6-R10 districts for Quality Housing buildings providing affordable housing pursuant to the Inclusionary Housing Program and Table 1 Modified Maximum Base Height and Maximum Building height for Certain Quality Housing Buildings

Brooklyn Community Board #16 is concerned that the increase in maximum height and number of stories in order to accommodate more affordable housing is too significant an increase to be considered Quality Housing in context. Many buildings in Ocean Hill are within a contextual district; the maximum heights and number of stories allowed will be out of place, especially along Eastern Parkway, where buildings are mostly low-rise. Furthermore, allowing C4-5D density along Atlantic Avenue will create a tunnel effect on an already very dark area and create unsafe conditions. *The Community Board seeks to lower the maximum allowed height and number of stories within Contextual Districts.*

VII. ZR 23-693 Special Height Limitations provisions applying adjacent to R1 through R6B Districts for R6-R10 districts

Brooklyn Community Board #16 is concerned that the maximum allowed height of developments within 25 feet of R1-R6B Districts will be increased from 35 feet to 75 feet. This revision is contradictory to the efforts and intentions of contextual districts and is not an appropriate change for the context of Ocean Hill. *The Community Board seeks to eliminate this revision to the ZQA text amendment and revert back to a 35 feet height maximum for developments within proximity of R1-R6B Districts.*

VIII. ZR 23-665a Additional Regulations: R6-R10

Brooklyn Community Board #16 is concerned that any existing buildings in these districts may be enlarged by up to one story or 15 feet without regard to street wall location requirements. Developments on new or existing buildings should remain within context of the neighborhood. This provision will allow buildings to add another story without concern for the heights of existing buildings. *The Community Board seeks to require an approval or permit process before allowing for the additional one-story or 15foot enlargement of existing buildings.*

IX. ZR 23-671 Special provisions for zoning lots directly adjoining public parks

Brooklyn Community Board #16 is concerned that the special provisions for zoning lots directly adjoining public parks is only applicable to those parks that are less than 75% paved. Callahan-Kelly is Ocean Hill's only source of open space within the rezoning area and the density of development proposed around the park is not appropriate for the area. *The Community Board seeks to apply these special zoning provisions to public parks and vital open space resources regardless of percentage that is paved.*

X. ZR 23-692 Height Limitations for narrow buildings or enlargements

Brooklyn Community Board #16 is concerned that the text allows for increase in height simply based off the height of an existing adjacent building. This means that buildings may continue to grow to a certain height that could be completely out of context with the street, based on the highest existing building on the street. *The Community Board seeks to redefine the height limits set on narrow and wide streets, not based on the height of the existing tallest building.*

XI. ZR 23-711 Standard minimum distance between buildings

Brooklyn Community Board #16 is concerned that decreasing the minimum spacing between residential buildings from 60 feet to 40 feet will encourage developments that will decrease quality of life for existing and new residents. This change will encourage more housing with less spacing in between, resulting in less light and open air space for residents. *The Community Board seeks to maintain the minimum 80 feet between buildings, particularly for any "wall to window" and "window to window" conditions.*

XII. ZR 25-251 Required Accessory Off-Street Parking Spaces for Income-restricted housing

units ZR 25-252 Required Accessory Off-Street Parking Spaces for Affordable Independent Residences for Seniors

Brooklyn Community Board #16 is concerned with the elimination of required off-street parking spaces for these residences, and particularly for new affordable residences for seniors. Not all seniors are able to take public transit and some rely on personal vehicles for transportation. Elimination of parking spaces may increase competition for parking around the developments. The "Transit Zone" does not apply to all residents of the neighborhood. *The Community Board seeks to maintain a minimum of at least fifty percent of the original requirement for accessory off-street parking spaces for new income restricted housing units and affordable independent residences for seniors.*

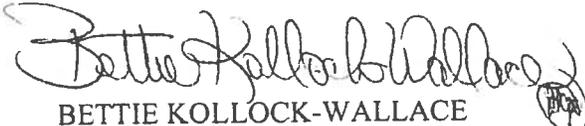
XIII. ZR 73-433 Reduction of parking spaces to facilitate affordable housing ZR 73-434 Reduction of existing parking spaces for income-restricted housing units ZR 73-435 Reduction of existing parking spaces for affordable residences for seniors

Brooklyn Community Board #16 is concerned with the elimination or reduction of required off-street parking spaces. The text is not specific in defining "undue adverse effects" on the surrounding area. The text should give particular consideration to residents who still own cars and need parking, especially for seniors and disabled persons. *The Community Board seeks to clarify the text for site-specific circumstances, similar to the "factors to be considered" in section 73-434. BSA should consider the needs of the surrounding residents and their options for public transportation before allowing reduction or elimination of parking.*

XIV. Appendix I: Transit Zone

Brooklyn Community Board #16 is concerned with the interpretation of CD16 as a transit zone. While many public transit lines (subways, buses, Access-A-Ride, etc.) run through the district, they are not accessible to everyone. Subway stations are not accessible to the disabled and buses and their operating lifts are not reliable. *The Community Board seeks to redefine the definition of a "Transit Zone" and add community-specific information regarding transit and transportation. The north of LIRR Bay Ridge Freight Line to west of Rockaway Avenue to south of Linden Boulevard should be removed from the transit zone.*

Very truly yours,



BETTIE KOLLOCK-WALLACE

Chairperson

cc: Hon. Eric Adams
Hon. Inez Barron
Hon. Rafael Espinal, Jr.
Hon. Darlene Mealy

COMMUNITY BOARD No. 18

1097 BERGEN AVENUE - BROOKLYN, NEW YORK 11234-4841

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Bill de Blasio
Mayor

Eric L. Adams
Borough President

Saul Needle
Chairperson

Dorothy Turano
District Manager

November 19, 2015

Honorable Bill de Blasio
Mayor of the City of New York
City Hall
New York, New York 10007

**RE: Zoning for Quality and Affordability Text Amendment Application # N160049ZRY
Mandatory Inclusionary Housing Application # N160051ZRY**

Dear Mr. Mayor:

Community Board No.18, at its regularly scheduled meeting on Wednesday, November 18, 2015, voted unanimously to oppose the adoption of the proposed Zoning for Quality and Affordability Text Amendment Application No. N160049ZRY, and the Mandatory Inclusionary Housing Application No. N160051ZRY.

This “one-size-fits-all” plan will undo decades of dedicated community planning for Community Boards, working with property owners, the Department of City Planning (DCP) and elected officials in an effort to preserve the physical and aesthetic character of our communities.

The proposed new rules would permit developers to build higher than currently allowed in “contextual zoning districts” – which protect low-rise neighborhoods from rampant development that is out of character with the existing housing stock – as long as they include below-market-rate units or senior housing with the virtual elimination of parking space requirements. These larger and taller developments will overshadow the low-scale buildings that characterize our neighborhoods.

Reduced parking requirements for senior housing will create an additional parking burden for our already overburdened available on-street parking. Senior citizens do own cars as do their visitors and the people employed at the facility. The plan would also expand the circumstances under which rear yards in residential neighborhoods can be built upon, though these provide a critically important resource of light, air and green space.

November 19, 2015

ZQA/MIH

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Community Board No.18 seeks to protect perfectly-sound single, two or three family detached or semi-detached homes on both sides of the street facing each other are not demolished to develop out-of-context facilities. The benefit should be extended to more than the existing R3X, R3-1, R4A and R4-1 sections of Canarsie and should be available to more of CB 18 neighborhoods of detached and semi-detached home areas.

Community Board No.18 seeks a maximum length where distance between building walls of connected buildings exceed 50 feet in height when at least one wall contains legal windows, with a maximum requirement of 60 feet between such building walls – which might have implication for adding new buildings to NYCHA sites, recognizing that there is a clear “vision,” and preventing the party wall from encroaching on the side yard requirements. Community Board No.18 opposes the “taking” of open space common areas in these developments.

Community Board No.18 is concerned that “Affordable Independent Residences for Seniors” would be pursuant to a regulatory agreement to occupancy by low income households for a minimum of 30 years in lieu of the City having the right to extend duration options. Community Board No.18 seeks to prevent generous additional floor area and relaxed parking requirements from being converted to market-rate housing.

Community Board No.18 seeks to restrict incompatible use and bulk from detached home areas in R3A, R5A and R6A Districts from being as-of-right.

Community Board No.18 seeks to have the section south of Flatlands Avenue removed from the Transit Zone.

Community Board No.18 seeks to define the surrounding area as up to 1,000 feet and BSA and DCP must consider the availability of parking in the surrounding area and the proximity of public transportation as factors in determining the amount of parking spaces to reduce or waive. (As proposed by DCP affects the area of east and north of East 93 Street and Avenue K.)

Community Board No.18 is concerned that the requirement to obtain discretionary approval for long-term care facilities is limited to R1 and R2 detached single-family home Districts, which allowing long-term care facilities in R3A, R3X, R4A and R5A detached home Districts as-of-right. CB 18 seeks that such use be pursuant to a Special Permit or DCP authorization as a means to provide standards of findings and CB input.

Community Board No.18 is concerned that the proposed DCP special permit allowance provisions for affordable independent residences for seniors to be applicable to long-term care facilities is too wide-spread for these R3 to R5 Zoning

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Districts, and could potentially result in out-of-context development of incapable intensity of use. This includes not having provisions for R3, R4, and R5 Districts.

This citywide proposed rezoning plan will permanently affect neighborhoods across the City. Once again, our communities find themselves faced with the need to oppose "policy over planning" - planning concepts long on text book theory, but short on the practicality of implementation. We urge the City Council to vote "NO" on both proposals until which time the uniqueness of each community can be incorporated in the planning process with the cooperation of the Community Boards and the elected officials.

Thank you.

Sincerely,



Saul Needle
Chairperson



Dorothy Turano
District Manager

cc: Hon. Carl Weisbrod, Chairperson, NYC Planning Commission
Hon. Melissa Mark-Viverito, Speaker, NYC Council
Hon. Eric A. Adams, Brooklyn Borough President
Members of the New York City Council
New York City Community Boards
Community Board No.18 Board Members

COMMUNITY BOARD #1 – MANHATTAN
RESOLUTION

DATE: NOVEMBER 19, 2015

COMMITTEE OF ORIGIN: PLANNING

BOARD VOTE: 38 In Favor 0 Opposed 0 Abstained 0 Recused

RE: Zoning for Quality and Affordability

WHEREAS: The New York City Department of City Planning (DCP) has proposed a zoning text amendment entitled Zoning for Quality and Affordability (ZQA); and

WHEREAS: ZQA would allow additional height and unit count, with streetscape and design improvements, with no increase in FAR, and would only be applicable in contextual zoning districts in eastern Tribeca and western Civic Center as well as certain portions of the Lower Manhattan Special District (C6-2A) and Tribeca Special Mixed Use District (Areas 1 and 3); and

WHEREAS: ZQA has three major goals: promote senior housing, reduce parking requirements for affordable housing and support the creation of Inclusionary Housing; and

WHEREAS: To promote senior housing, ZQA would update use regulations to allow a spectrum of affordable senior housing and care facilities, as well as flexibility for mixing of uses and allowing limited additional floor area ratio (FAR) and height (1-2 stories in an estimated 95% of cases); and

WHEREAS: In order to encourage participation in the Inclusionary Housing Program (IHP), ZQA would update height and setback regulations to allow limited additional height (1-2 stories in an estimated 95% of cases); and

WHEREAS: ZQA would also create a transit zone within a half-mile of a subway station that does not require parking for affordable housing; and

WHEREAS: DCP expressly represented that, under the ZQA proposal, there would be:

- No additional market-rate floor area;
- No provisions that encourage tear-downs;
- No elimination of any contextual zoning district, or re-mapping of any zoning district;
- No reduction or alteration of the Landmarks Preservation Commission's oversight and review in historic districts or landmarked buildings;
- No reduction in the amount of green or open spaces required for buildings; and
- No dramatic changes in development in any neighborhood.

WHEREAS: The changes proposed in ZQA would only be applicable in a very small portion of CD1 in Tribeca, the Civic Center and portions of the Lower Manhattan Special District (C6-2A) and Tribeca Special Mixed Use District (Areas 1 and 3); and

WHEREAS: All of the applicable C6-2A areas in the Lower Manhattan Special District are overlaid by the South Street Seaport Historic District, and most of the applicable areas in the Tribeca Special Mixed Use District are overlaid by the Tribeca Historic Districts; and

WHEREAS: CB1 is aware that other community boards and elected officials have expressed various questions and concerns regarding the text amendment, including those raised in a November 17, 2015 letter addressed to CPC Chair Carl Weisbrod from Borough President Gale Brewer and co-signed by several Members of Congress, New York State Senators, New York State Assembly Members and New York City Council Members; now

THEREFORE
BE IT
RESOLVED

THAT: CB1 supports the objective and goals of ZQA and strongly supports enabling the development of permanent city-wide affordable housing; and

BE IT
FURTHER
RESOLVED

THAT: CB1, however, opposes the ZQA text amendment as currently proposed; and

BE IT
FURTHER
RESOLVED

THAT: CB1 requests the Department of City Planning and City Planning Commission seek to resolve the following concerns of CB1, as well as those reported concerns of other community districts and various elected officials, regarding the current proposal for ZQA:

1. CB1 is disappointed by the minimal applicability for this proposal in CD1 and requests that DCP continually evaluate new ways to create affordable housing in CD1 and city-wide;
2. In the case that ZQA would be applied in CD1, adequate city services and infrastructure improvements must be matched in order to accommodate the increased residential population;
3. CB1 firmly believes that long-term protection of affordability is as important as new resident's affordability protections;
4. CB1 is concerned that there is no requirement for DCP to return to community districts to give an update on the progress of ZQA after the program would be implemented;
5. CB1 more generally does not believe a one-size-fits-all approach to zoning is necessarily a proper approach in a city as large and diverse as New York City;
6. CB1 is concerned this program takes away zoning input and decisions from each of the community districts including CB1;
7. There is concern this program may encourage out-of-context development and result in taller, bulkier and out-of-context buildings;
8. CB1 is concerned with the impact of eliminating the "Sliver Law" under ZQA when affordable housing is part of the project;

9. CB1 is also concerned with the impact ZQA could have if changes in the Voluntary Inclusionary Housing and R10 programs are not considered at the same time, including tightening loose off-site provisions, requiring that a greater percentage of square footage be set aside for affordable units, obtaining additional affordable housing where there is “double-dipping” by way of a 421-a benefit, and strengthening community review requirements;
10. The creation of senior housing under ZQA is not permanent, even though height and FAR increases are;
11. This program does not encourage creation of mixed-income neighborhoods;
12. CB1 is concerned with the process in which this proposal was crafted, having come to the community boards only after significant input from other interests including the real estate industry; and
13. This program does not fight displacement or secure adequate tenant anti-harassment protections in the event that ZQA has the effect of encouraging redevelopment of an existing residential building.

Tobi Bergman, *Chair*
Terri Cude, *First Vice Chair*
Susan Kent, *Second Vice Chair*
Bob Gormley, *District Manager*



Antony Wong, *Treasurer*
Keen Berger, *Secretary*
Susan Wittenberg, *Assistant Secretary*

COMMUNITY BOARD NO. 2, MANHATTAN

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Greenwich Village ♦ Little Italy ♦ SoHo ♦ NoHo ♦ Hudson Square ♦ Chinatown ♦ Gansevoort Market

November 20, 2015

Carl Weisbrod, Director
City Planning Commission
22 Reade Street
New York, NY 10007

Dear Mr. Weisbrod:

At its Full Board meeting on November 19, 2015, CB#2, Manhattan (CB#2-Man.), adopted the following resolution:

Zoning for Quality and Affordability (ZQA) Presentation by the staff of Department of City Planning to review the impact of the proposed citywide zoning text amendment: Zoning for Quality and Affordability (ZQA).

Whereas

1. Zoning for Quality and Affordability (ZQA) is a proposal for a citywide text amendment affecting the height and bulk of buildings in residential zones.
2. In an effort to increase development of inclusionary housing and to improve the design of buildings in contextual zones, ZQA generally allows for taller buildings and more utilization of floor area allowances.
3. ZQA seeks to encourage more affordable senior housing by encouraging unit types that correlate with available programs and by reducing costs to developers (for example, by reducing parking requirements).
4. ZQA will allow permanent height increases to senior housing developments that will not be permanently affordable.
5. Because it is a citywide zoning text change, in-depth analysis of environmental impacts is not required, even though the changes will allow larger developments in areas where current limits were established under ULURP and after detailed negotiations with community boards, borough presidents, and council members.

6. Because the Department of City Planning opted to alter existing zones rather than offer ZQA as an additional option, the “zoning toolbox” available to neighborhoods will be reduced and in many cases restrictions providing for appropriately-scaled development will no longer be available.
7. While CB2 strongly supports the goals of improving housing quality and increasing the acceptance rate by developers of bonuses for inclusionary housing, no evidence has been provided that the solutions offered will effectively address the problem.
8. DCP has offered only anecdotal evidence--essentially complaints from “practitioners”--to justify the proposed height increases of up to 31%for inclusionary developments.
9. Similarly, no study was performed to demonstrate that allowing housing- related uses in rear yard obstructions will increase uptake by developers of opportunities for inclusionary developments.
10. There is no way to know that the result of these changes will not be the same amount of affordable housing, but in taller buildings with no rear yards.
11. New rear yard obstructions are potentially very harmful in built-up areas with mixed building types, and also may increase run-off flow into the sewer system.
12. Zoning provisions preventing sliver infill buildings were put in place after recognition of the significant harm these buildings do to the built environment.
13. CB2 appreciates the attention to detail and clarity of responses provided by DCP during extensive presentations and sessions with the CB2 Land Use Committee and Board leadership.

Therefore it is resolved that CB2, Man.:

1. Supports the goal of increasing inclusionary housing, but strongly opposes the proposed text changes because they will result in taller buildings without any environmental review and without any evidence that more inclusionary housing will be developed.
2. Opposes height increases in existing zones until a study is completed that demonstrates that the increases will result in additional inclusionary housing.
3. Would only support the enactment of ZQA’s zoning rule changes if they were additions to the existing zoning text (i.e. text for new zoning districts that do not currently exist) as opposed to replacing the existing districts whole cloth. This would allow the new rules which DCP is putting forward to move forward through ULURP on a case-by-case, community by community basis.
4. Supports efforts to create opportunities for contextual buildings with improved presentation at the street level.
5. Opposes allowances for rear yard obstructions outside commercial zones;
6. Opposes any changes that will allow development of “sliver” buildings.

Vote: Unanimous, with 38 Board members in favor.

Please advise us of any decision or action taken in response to this resolution.

Sincerely,



Tobi Bergman, Chair
Community Board #2, Manhattan



Anita Brandt, Chair
Land Use & Business Development Committee
Community Board #2, Manhattan

TB/fa

- c: Hon. Jerrold L. Nadler, Congressman
Hon. Deborah Glick, Assembly Member
Hon. Daniel Squadron, NY State Senator
Hon. Brad Hoylman, NY State Senator
Hon. Gale A. Brewer, Manhattan Borough President
Hon. Margaret Chin, Council Member
Hon. Corey Johnson, Council Member
Hon. Rosie Mendez, Council Member
Sylvia Li, Dept. of City Planning



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Gigi Li, Board Chair

Susan Stetzer, District Manager

November 30, 2015

Carl Weisbrod
Director, Department of City Planning
22 Reade Street – 2N
New York, NY 10007

Dear Director Weisbrod,

At its November 2015 monthly meeting, Community Board 3 passed the following resolution:

VOTE: Community Board 3 Denies approval for the citywide text amendment, Zoning for Quality and Affordability N 160049 ZRY

WHEREAS Community Board 3 has considered the text amendment for Zoning for Quality and Affordability N 160049 ZRY which has a goal of addressing affordability in senior housing and care facilities, providing inclusionary housing buildings and changes rules regarding streetscape, courtyards and other elements and improving ground floor retail; and

WHEREAS CB3 passed a resolution in July 2015 opposing Zoning for Quality and Affordability (quoted below); and

WHEREAS there have been no substantive changes in the proposal since that July 2015 resolution; so

THEREFORE BE IT RESOLVED Community Board 3 denies the text amendment for Zoning for Quality and Affordability N 160049.

VOTE: Resolution regarding Quality and Affordable Housing Proposal, July 2015

WHEREAS CB 3 highly values the need for the creation of affordable housing in our community, quality design in new construction, and the preservation of neighborhood character in new development, and

WHEREAS the Department of City Planning has put forward the 'Zoning for Quality and Affordability' proposal, a complex plan which would change many aspects of the regulations governing development in our neighborhood, and which purports to improve quality in design and increase the production of affordable and senior housing, while maintaining neighborhood character, and

WHEREAS the proposal takes a "one-size-fits-all" approach of changing regulations, especially height limits, in contextual zones across the city, without regard to specific neighborhood conditions or character, and

WHEREAS the contextual zoning districts and their height limits in CB 3 were arrived at after years of work, careful examination of local conditions, and considerable compromise to balance the concerns of

all affected parties, limiting development potential and height for new development in some areas while raising it in others, and

WHEREAS the current contextual zoning height limits for our neighborhoods already allow Development which is generally of a greater height than what is typical of the neighborhood, and

WHEREAS the proposed changes would unnecessarily increase the allowable height of new development in our R7-A and R7-A-equivalent zones for purely market rate housing, and increase it considerably for inclusionary developments (80% market rate, 20% affordable), and

WHEREAS the proposed changes would also increase the allowable height of new development in our other contextual zoning districts by smaller but nevertheless significant amounts, and

WHEREAS the proposed changes would also increase the allowable height of new Quality Housing developments in non-contextual zones significantly, and

WHEREAS the rationale for the proposed changes in height limits for market rate housing is that it would make for better, higher quality new developments and allow market rate developers to always access the full allowable FAR, and

WHEREAS CB 3 does not see how such changes would result in better quality new developments, and does not agree that zoning should be changed to ensure that every developer is able to utilize the maximum possible FAR in every single development, and

WHEREAS the rationale for the proposed changes in height limits for inclusionary developments is that the current height limits discourage more developers from opting into the inclusionary program, and these changes would result in the creation of more affordable housing units, and

WHEREAS there is little evidence to indicate that height limits alone determine whether some developers chose to opt into the inclusionary program and produce affordable units, but rather financing, bureaucratic hurdles, and economies of scale, which this proposal does not address, are main determinants, and

WHEREAS the proposed changes do not make participation in the inclusionary program mandatory, and do not increase the required amount of affordable housing above the current 20%, and

WHEREAS CB 3 sees no benefit in increasing the allowable height of purely market rate developments, and

WHEREAS CB 3 sees no direct evidence that changing the height limits will result in an increase in the production of affordable housing in our neighborhoods, and believes that even if it did, the proposed increases in allowable height are extremely generous for developments which would only include 20% affordable housing, and

WHEREAS if increasing height limits does incentivize the creation of affordable housing, then it would seem that granting some of that height increase for purely market rate housing actually *decreases* that incentive, by making some of that benefit available without having to provide any affordable housing, and

WHEREAS the proposed changes in allowable height for senior affordable housing only requires that a (sometimes quite small) percentage of the developments in which they are located are actually senior

affordable housing, while the remainder can be general market rate housing, and still benefit from the full proposed height increase, and

WHEREAS CB 3 believes that maintaining the scale of new development in our neighborhood is a critical goal, and that the proposed changes would significantly damage those efforts while offering comparatively little or no public benefit in return, so

THEREFORE BE IT RESOLVED that CB 3 urges that all height increases for purely market rate housing in contextual zones and for Quality Housing in non-contextual zones be eliminated from the plan, and

THEREFORE BE IT FURTHER RESOLVED that CB 3 urges that the proposed height increases for affordable housing in contextual zones and for Quality Housing developments in non-contextual zones a) be contingent upon concrete statistical evidence which shows that such changes would actually increase the amount of affordable housing produced, b) should be the minimum amount necessary to produce such affordable housing, and c) should only be applicable for developments which include more than 20% affordable housing, which is a relatively minimal public benefit for such a dramatic proposed giveaway of additional height and for loss of sky, light and air, and

THEREFORE BE IT FURTHER RESOLVED that CB 3 urges that the proposed height increases for senior housing should also a) be contingent upon evidence which shows that such changes would actually increase the amount of affordable senior housing produced, b) should be the minimum amount necessary to produce such housing, and c) should only be made available to developments which are 100% senior affordable housing or senior affordable housing-related, not for developments which are as little as 10% senior affordable housing, as would currently be allowed under the proposal.

Please contact the community board office with any questions.

Sincerely,



Gigi Li, Chair
Community Board 3



MyPhuong Chung, Chair
Land Use, Zoning, Public and Private Housing Committee

Cc: Andrew Lombardi, Office of Manhattan Borough President Gale Brewer
Erica Baptiste, Office of Manhattan Borough President Gale Brewer
Sheila Rodriguez, Office of New York City Council Member Rosie Mendez
Vincent Fang, Office of New York City Council Member Margaret Chin
Joel Kolkmann, New York City Department of City Planning
Edith Hsu Chen, New York City Department of City Planning
Baaba Halm, New York City Department of Housing and Preservation



CITY OF NEW YORK

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Christine Berthet
Chair

Jesse R. Bodine.
District Manager

November 30, 2015

Carl Weisbrod, Chair
City Planning Commission
22 Reade Street
New York, New York 10007

Re: **Zoning for Quality and Affordability**
N160049ZRY (proposed zoning text amendment)

Dear Chair Weisbrod,

At its full board meeting on November 4th, 2015, Manhattan Community Board 4 (MCB4) reviewed the application by the New York City Department of City Planning (the "Applicant") for the proposed Citywide Zoning Text Amendment to create a Mandatory Inclusionary Housing Program (MIH).

The Board by a vote of 39 in favor, 0 opposed, 0 abstention and 0 present but not eligible **recommended to deny unless** the following modifications changes are made to the proposed Zoning for Quality and Affordability zoning text amendment (ZQA).

Background and Context

The Community Board has long understood the importance of affordable and senior housing in the communities of Chelsea, Hudson Yards and Clinton/Hell's Kitchen. Our concerns are based on 40 years of community planning and the creation of four Special Zoning Districts.

Special Clinton District

Adopted by the Board of Estimate¹ in 1973, the Special Clinton District ("SCD") was one of the first Special Purpose Districts created. The SCD allowed dense residential and commercial to proceed in the Perimeter Areas (along 8th Avenue and West 42nd Street) while establishing a Preservation Area, with specific height limits, in the neighborhood's core (west of 8th Avenue to west of 10th Avenue, from West 43rd to West 56th Streets) Notably, the SCD was the first district to feature a zoning bonus for the creation of affordable housing as well as the first to include protections against tenant harassment. The SCD's tenant anti-harassment provisions (requirements for Certificates of No Harassment (CONH)) prevented owners from altering or

¹ Until 1990, the Board of Estimate was the precursor body to the City Council for final approval of zoning actions.

demolishing building in which harassment had been documented. That provision has been an ongoing deterrent against wholesale tenant displacement.

The Chelsea Plan—rezoning of East Chelsea

Adopted as a rezoning by City Council in 1996, the Chelsea 197-a Plan the community was community initiative to craft compromises and trade-offs to balance the competing needs for development and preservation in East Chelsea, a 64-block area between 14th and 34th Streets west of Sixth Avenue. The Chelsea Plan was a set of recommendations for zoning changes intended to create housing opportunities and to balance new development with the preservation of neighborhood context. The Plan embraced contextual zoning, establishing requirements for streetwalls, height and setback and building heights. These provisions were carefully calibrated on 6th, 7th and 8th Avenues and the side streets dependent on upon the built context which ranged from lofts and 6 to 8 story apartment buildings to 5 to 3 story tenements and brownstones.

Special Hudson Yards District

Adopted by the City Council in 2005, the Special Hudson Yards District (SHYD) was created to foster commercial and residential development west of 8th Avenue from West 30th to West 41st Streets in a former manufacturing zone. The SHYD allows the highest density of commercial development of any district in the City of New York. It established a series of zoning mechanisms and bonuses to create revenue for the city's Hudson Yards Infrastructure Corporation service bonds used primarily for the construction of #7 line subway extension and its station on West 34th Street. After negotiations with the MCB4 and the City Council, the SHYD was amended to include provisions for affordable housing production and development, through Inclusionary Housing, demolition restrictions and anti-harassment provisions (requirements for Certificates of No Harassment (CONH) in the final zoning text. In 2009, The SHYD was amended to include the Western Railyards (WRY), the site of the failed football stadium plan. That amendment included further provisions for affordable housing both on and off site. During both zoning actions, height, set back and court and streetwall provisions were carefully calibrated among all subdistricts in the SHYD.

Special West Chelsea District

Adopted by the City Council in 2005, the Special West Chelsea District (SWCD) was created to facilitate the Highline Park and foster commercial and residential development in Chelsea west of 10th Avenue from West 23rd to West 15th Streets in a former manufacturing zone. The SWCD also established a series of zoning mechanisms for transfer of development rights for properties encumbered by the Highline. After negotiations with the MCB4 and the City Council, the SHYD was amended to include provisions for affordable housing production and development, through Inclusionary Housing, demolition restrictions and anti-harassment provisions (requirements for Certificates of No Harassment (CONH)) in the final zoning text. During both zoning actions, height, set back and court and streetwall provisions were carefully calibrated for all subdistricts in the SWCD

Application

The City proposes city-wide amendments to the Zoning Resolution that will:

- Increase available floor area for developments that include affordable senior housing

- Remove parking requirements for affordable housing developments
- Modify height and setback restrictions in contextual districts

Elements of the Application

Senior Housing

Affordable Senior Housing

- Change name of the zoning definition “non-profit residence for the elderly” to “affordable independent residence for seniors”
- Allow approximately 20% more floor area for “non-profit residences for the elderly” in R8 through R10 districts and numerous medium density contextual districts
- Increase permitted unit density in “affordable independent residence for seniors”

Long-Term Care Facilities

- Create a new definition for “long term care facilities” and add this designation to Use Group 3, Community Facilities
- Allow all “long-term care facilities” in R3 through R10 districts, including nursing homes, as-of-right
- Extend proposed FAR increase for “affordable independent residences for seniors” to “long term care facilities” in districts R3 through R10 as-of-right
- Require special permits for development of “long-term care facilities” in R1 and R2 districts

Mixing of Residence and Care Facilities

- Clarify calculations for requirements and floor area deductions under Quality Housing
- Allow use of residential FAR caps for mixed developments with residential units and Non-profit Institutions with Sleeping Accommodations and Long-Term Care Facilities, instead of typical reduced FAR for mixed use facilities in order to provide a ‘spectrum of care’ for senior residents
- Clarify calculation of dwelling unit factor in buildings with residential and community facility uses
- Remove restriction that community facilities cannot be on the same floor or above residential uses in special districts. Maintain restriction for commercial uses

Height and Setback Modifications

Affordable Senior Housing and Long-term Care Facility Building Envelopes

- Increase permitted FAR by approximately 20% in R6 through R10 districts for affordable senior housing and long term care facilities
- Permit greater height and number of stories for uses other than residential where higher FAR is permitted for buildings with 20% or greater affordable senior housing and long term care facility uses
- Increase base height to conceal increase in overall additional building height
- Permit shared accessory spaces for affordable senior housing in rear yards and ground

floors in districts other than “B” districts

- Remove the height restriction of the width of abutting street and change to maximum permitted by the contextual envelope for narrow buildings (less than 45 feet)
- In R6 through R10 non-contextual districts, permit a more flexible “alternative Quality Housing building envelope” for sites where infrastructure creates barrier

Inclusionary Housing Building Envelopes

- Permit greater maximum height for full use of FAR available through the IH program
- Increase base height to conceal increase in overall additional building height
- Permit shared accessory spaces in rear yards and ground floors in districts other than “B” districts
- Remove the Sliver Law height restriction of the width of abutting street and change to maximum permitted by the contextual envelope for narrow buildings (less than 45 feet)

Ground Floors

- Increase ground floor height to allow buildings with residential units on the ground floor to elevate unit windows above street level and to allow for the addition of retail spaces which require heights greater than the maximums currently in place.
- Increase maximum height of Quality Housing buildings by 5 feet if the second floor begins at 13 feet or higher in all contextual zoning districts except R7B and R8B
- Allow a floor area exemption of up to 100sf for ramps in a residential floor lobby

Street Walls

- For medium density contextual districts, require buildings to locate their streetwall only in relation to directly adjacent buildings
- Reduce maximum setback from 15 feet off of the property line to 10 feet
- Clarify line-up provisions for buildings with architectural features such as bay windows in “B” districts
- Add street wall requirements beyond 50 feet of a wide street in high density districts
- Permit window recesses and structural expression within one foot from the street wall
- Allow deeper projections for a limited percentage of the street wall’s overall width
- In R6 through R10 districts, modify required width to depth ratio to 1:1 for courts less than 30 feet and remove restrictions for courts wider than 30 feet
- Add streetwall requirements beyond 50 feet of a wide street in high density commercial districts
- Wholly residential buildings must comply with more stringent streetwall commercial regulations in commercial districts
- Remove special line-up provision whereby narrow buildings in a commercial district have to line up with adjacent buildings so that they may better conform to conditions in the area.

Corner Buildings

- Increase maximum permitted lot coverage to 80% to 100% for buildings within 100 feet of a corner in R6 through R10 districts
- Allow portions of buildings in a high density district that are also within 25 feet of a low

density district to build either a maximum height of 75 feet or the maximum base height of the zoning district, whichever is less

Setback Requirements

- Remove rear yard setback requirements from Quality Housing buildings
- Reduce required front setback above base height by 1 foot for every foot it is set back from the property line, but maintain a 5 foot minimum setback

Building Envelopes and Number of Stories

- Increase maximum base height in some districts by 5 feet, consistent with maximum overall height increase
- Establish a maximum number of stories that can be built in a zoning district in concert with maximum building height
- Increase maximum building height by 5 to 10 feet in R9 and R10 districts
- Align Quality Housing optional regulations on wide streets with comparable “A” districts and narrow street regulations in “B” districts
- Allow for Quality Housing option building envelope in former study areas in non-contextual areas
- Adjust building envelopes in Special Zoning Districts where special building envelope and maximum FAR rules are not explicitly stated so that the maximum building envelopes are in line with the changes proposed for Quality Housing.

Unit Size and Configuration

- Remove 400sf minimum apartment size to provide greater unit type flexibility and allow unit density factor to govern
- Reduce density factor in R8 through R10 districts to 680sf
- Remove various double-paned window requirements from Zoning Resolution as they restrict use of higher efficiency window and are already mandated by building code
- Allow the Office of Environmental Remediation to modify sound-attenuated window requirements based on site conditions

Irregular Site Conditions

- Adjust rear yard and lot coverage requirements to allow for shallower rear yards and higher lot coverage
- Provide greater flexibility for street walls on acutely angled lots
- Reduce lot slope requirement from 10% to 5% for use of sloping base plane
- Reduce separation of multiple buildings on a single lot from 60 feet to 40 feet
- Create a new BSA special permit for Quality Housing on an irregular lot with additional flexibility for sites with predominately affordable housing

MCB4 Proposed Actions and Recommendations

Senior Housing

The provision of a wide array of housing options for seniors is essential to fostering communities in which seniors can receive a spectrum of services as they age in place. These proposed changes will ensure that senior housing meets the diverse needs and capabilities of our seniors.

MCB4 supports:

Affordable senior housing

Updating the definition of Senior Housing brings current usage into the Zoning Resolution. Promoting affordable housing through increased density in bulk and unit density makes development more financially feasible. However, such incentives to meet the need for affordable housing for seniors must be tempered by neighborhood context. Such bulk and height increases are not appropriate to all districts in a neighborhood. Social needs should not be met at the expense of light and air, livable streets and neighborhood scale.

- *Changing name of the zoning definition “non-profit residence for the elderly” to “affordable independent residence for seniors”*
- *Increased unit density for non-profit residences for the elderly*

Long-Term Care Facilities

Allowing long-term care facilities to be developed, with fewer restrictions, will remove barriers to providing much needed care for seniors in our community. However, such incentives to meet the need for long term care facilities must be tempered by neighborhood context. Such bulk and height increases are not appropriate to all districts in a neighborhood. Social needs should not be met at the expense of light and air, livable streets and neighborhood scale.

- *The new definition in the Zoning Text of long-term care facilities*
- *Allowing all “long-term care facilities” in R3 through R10 districts, including nursing homes, as-of-right*

The mixing of residential and care facilities

This set of changes enables facilities; with mixed uses that address the changing care needs senior have over time, to be developed.

- *Clarification of calculations for requirements and floor area deductions under Quality Housing and calculation of dwelling unit factor in buildings with residential and community facility uses*
- *Allowing use of residential FAR caps for mixed developments with residential units and Non-profit Institutions with Sleeping Accommodations and Long-Term Care Facilities, instead of typical reduced FAR for mixed use facilities in order to provide a ‘spectrum of care’ for senior residents*
- *Removing restrictions prohibiting community facilities not to be on the same floor or above residential uses in special zoning districts. (this restriction will be maintained for commercial uses*

Height and Setback Modifications

MCB4 supports:

Affordable Senior Housing and Long-term Care Facility Building Envelopes

These zoning text changes will enable better use of rear yards and ground floors for senior housing and more flexible building envelopes.

- *Shared accessory spaces for affordable senior housing in rear yards and ground floors in districts other than “B” districts*
- *In R6 through R10 non-contextual districts, permit a more flexible “alternative Quality Housing building envelope” for sites where infrastructure creates barrier*

Inclusionary Housing--building envelopes.

These zoning text changes will enable better use of rear yards and ground floors for senior housing.

- *Shared accessory spaces for affordable senior housing in rear yards and ground floors in districts other than “B” districts*

Ground Floors

These zoning text changes will enable ground floors at lower than street level by exempting a limited FAR for accessible ramps.

- *A floor area exemption of up to 100sf for ramps in a residential floor lobby*

Street Walls

These zoning text changes will enable corner buildings to better fit into their neighborhood context on 7th and 9th Avenues in Chelsea, on 9th Avenue lower Hell’s Kitchen and on 11th Avenue from West 42nd to West 54th Streets.

- *For medium density contextual districts, requiring buildings to locate their streetwall only in relation to directly adjacent buildings*
- *Reducing maximum setback from 15 feet off of the property line to 10 feet*
- *Clarifying line-up provisions for buildings with architectural features such as bay windows in “B” districts*
- *Adding street wall requirements beyond 50 feet of a wide street in high density districts (R8 through R10).*
- *Permit window recesses and structural expression within one foot from the street wall*
- *Allow deeper projections for a limited percentage of the street wall’s overall width*
- *In R6 through R10 districts, modify required width to depth ratio to 1:1 for courts less than 30 feet and remove restrictions for courts wider than 30 feet*
- *Add streetwall requirements beyond 50 feet of a wide street in high density commercial districts*
- *Requiring wholly residential buildings to comply with more stringent streetwall commercial regulations in commercial districts*
- *Removing special line-up provision whereby narrow buildings in a commercial*

district have to line up with adjacent buildings so that they may better conform to conditions in the area.

Corner Buildings

These zoning text changes will enable corner buildings to better fit into their neighborhood context on 7th and 9th Avenues in Chelsea, on 9th Avenue lower Hell's Kitchen and on 11th Avenue from West 42nd to West 54th Streets.

- *Increasing maximum permitted lot coverage to 80% to 100% for buildings within 100 feet of a corner in R6 through R10 districts*
- *Allowing portions of buildings in a high density district that are also within 25 feet of a low density district to build either a maximum height of 75 feet or the maximum base height of the zoning district, whichever is less*

Setback Requirements

These allowances will grant flexibility in setback modifications while also preserving the quality of street life, which is the overarching goal of setback requirements.

- *Removing rear yard setback requirements from Quality Housing buildings*
- *Reducing required front setback above base height by 1 foot for every foot it is set back from the property line, but maintain a 5 foot minimum setback*

Building Envelopes and Number of Stories

Aligning the set of options and regulations that govern the various districts in MCB4 allows for simpler, more accessible guidelines.

- *Aligning Quality Housing optional regulations on wide streets with comparable "A" districts and narrow street regulations in "B" districts*
- *Allowing for Quality Housing building envelope option in former study areas in non-contextual areas*
- *Adjusting building envelopes in Special Zoning Districts where special building envelope and maximum FAR rules are not explicitly stated so that the maximum building envelopes are in line with the changes proposed for Quality Housing.*

Unit Size and Configuration

These zoning text changes will provide for greater flexibility in unit sizes, greater density and allow for a wider array of household sizes in buildings. The window requirements are now embodied Building Code and Office of Environmental Remediation requires flexibility in sound attenuation requirements.

- *Removing 400sf minimum apartment size to provide greater unit type flexibility and allow unit density factor to govern*
- *Reduce density factor in R8 through R10 districts to 680sf*
- *Remove various double-paned window requirements from Zoning Resolution as they restrict use of higher efficiency window and are already mandated by Building Code*
- *Allow the Office of Environmental Remediation to modify sound-attenuated window requirements based on site conditions*

Irregular Site Conditions

These zoning text changes will enable more flexibility to develop shallow and acutely angled lots.

- *Adjust rear yard and lot coverage requirements to allow for shallower rear yards and higher lot coverage*
- *Provide greater flexibility for street walls on acutely angled lots*

MCB4 cannot support the following provisions of the ZQA unless the modifications and conditions below are met:

Affordability Time Limits on Senior Housing

In the City’s current proposed ZQA zoning text, there is no permanent affordability restriction for non-profit residences for the elderly or long-term care facilities that are not also Inclusionary Housing.

- *MCB4 recommends that non-profit residences for the elderly or long-term care facilities which receive as of right 20% FAR increases should be permanently affordable. If the additional bulk is permanent, the affordability should be permanent as well.*

Affordable Senior Housing and Long-term Care Facility Building Envelopes

Absent zoning text guaranteeing permanent affordability, **MCB4 cannot support:**

- *Extending proposed FAR increases for “affordable independent residences for seniors” to “long term care facilities” in districts R3 through R10 as-of-right*
- *The proposed increases in floor area in R8 through R10 districts as a method of fostering the development of affordable senior housing.*

Inclusionary Housing Building Envelopes

These provisions curtail MCB4’s efforts to ensure that the character of our neighborhoods is preserved and opens the door for out-of-scale developments and sliver buildings. **MCB4 cannot support:**

- **Removing the Sliver Law height restrictions of the width of abutting street and change to maximum permitted by the contextual envelope for narrow buildings (less than 45 feet)**

Building Envelopes and Number of Stories

The changes below will threaten MCB4’s efforts to ensure that quality, contextual buildings of adequate scale continue to be built in our neighborhood. **MCB4 cannot support wholesale zoning text changes to:**

- *Increasing maximum base height in some districts by 5 feet, consistent with maximum overall height increase*
- *Establishing a maximum number of stories that can be built in a zoning district in concert with maximum building height*
- *Increasing maximum building height by 5 to 10 feet in R9 and R10 districts*

However, MCB4’s support is qualified as noted below.

For the Special Zoning Districts and areas noted below affected by the proposed Zoning Text Modifications in the ZQA, MCB4 requests the City Planning Commission modify the proposed Zoning Text to include to **establish hard Building and Streetwall Height Limits in the:**

- **Special Clinton District**—Subarea C2 in the SCD (11th Avenue, West 43rd and West 44th Streets, 10th 11th Avenues)
- **Special Hudson Yards District**—Subareas D4 & D5 (Hell’s Kitchen Subdistrict) of the SHYD
- **Special West Chelsea District**—West 23rd Street between 10th and 11th Avenues
- **East Chelsea**—an irregular geographic area in East Chelsea from West 14th to West 30th Streets, from the west side of 6th Avenue to the east side 10th Avenue rezoned under the 1996 Chelsea Plan (197-a and 197-c).

Special Clinton District (SCD) –in 2009, as part the rezoning of Western Railyards, the Mayor and the City Council agreed to study rezone West Clinton, a manufacturing area primarily west of 10th Avenue, including 11th Avenue from West 43rd to West 54th Streets and 43rd/44th Street corridor between 10th and 11th Avenues. The goals of such rezoning, which had long been requested by the community, were:

- promoting residential development, with accompanying provisions for affordable housing through Inclusionary Housing
- neighborhood preservation by extending of the Preservation Area in midblocks
- ensuring neighborhood context through heights limits and streetwall requirements

The agreement also called for the rezoning application to be jointly submitted by the Department of City Planning and MCB4.

After a 2 year study process, marked by careful and thoughtful negotiation by both parties, an application was certified and adopted in 2011. The midblocks were put in the Preservation Area with height limit of 66 feet, the east side of 11th Avenue was rezoned to R8A, with height limit of 120 feet and streetwalls between 60 and 80 feet to respect and tie into the adjacent Preservation Area, and the 43rd/44th corridor, provided a transition block between the high density C6-4 corridor on West 42nd and the Preservation Area to the north. The blocks west of 11th Avenue, requested by the community to be rezoned residential, remained manufacturing but with a height limits of 135 feet and use restrictions prohibiting hotel use.

Ever since that action, The Clinton/Hell’s Kitchen community has been vigilant in monitoring compliance to those zoning changes. The proposed ZQA proposes to undo that 2 year effort along with the community and political compromises it represents. MCB4 cannot support such an action.

Instead MCB4 requests that SCD 96-31 be modified to include Zoning Text to establish height and setback limits in Subarea C2 of the SCD consistent with the adopted 2011 West Clinton Rezoning.²

² Attached proposed SCD Zoning text amendment (**Appendix A**)

East Chelsea—MCB4 requests the establishment of Building and Streetwall Height Limits in a geographic area of East Chelsea in areas rezoned under the 1996 Chelsea Plan. The Chelsea Plan, adopted by the City Council in May 1996, was a set of recommendations for zoning changes intended to create housing opportunities and to balance new development with the preservation of neighborhood context within a 64-block area between 14th and 34th Streets west of Sixth Avenue. With the Chelsea Plan the community undertook the task of deciding what compromises and trade-offs best balanced the two competing needs.

East Chelsea was subjected to the same intensive review that West Chelsea received during the subsequent creation of the Special West Chelsea District (SWCD). The designated subareas in the SWCD, which have text-based height limits, are not affected by the proposed ZQA Zoning Text Amendment. However, the areas rezoned³ through Chelsea Plan (197-a and 197-c), would be fully subject to the proposed building height and setback increases.

MCB4 requests that a geographic area⁴, previously rezoned under the Chelsea 197-a Plan (as modified by DCP and adopted as a 197-c rezoning by the City Council on May 22, 1996), establish height and setback limits in the Zoning Text consistent with that 1996 plan.⁵

Special Hudson Yards District (SHYD)—In 2005, after working with MCB4 from 2001, the City Council adopted rezoning of 38 blocks of former manufacturing area on the Westside of Manhattan to create the SHYD. The 196 pages of zoning text are extremely detailed and specific regulations governing the transfer of development rights from the Eastern Railyards, establishing a District Improvement Bonus, providing for subway improvements and sidewalk widening, acquiring park land and new streets and establishing Inclusionary Housing zones. The text even specifically calls out requirements for percentage of glass in storefronts.

A main effort of the Clinton/Hell’s Kitchen community was the preservation of the neighborhood’s main street, 9th Avenue, and the residential tenement midblocks between 9th and 10th Avenues from West 35th to West 41st Streets.

All these efforts were codified in an agreement between the Mayor and City Council, the Hudson Yards Points of Agreement (HYPOA)⁶. In that agreement, the reduction of proposed height and establishment of streetwall requirements to respect the context of the existing 4 and 5 story tenements in those blocks was accomplished through mapping an R8A zone in the Hell’s Kitchen Subdistrict (areas D4 and D5 of the SHYD). The existing tenements were also protected from demolition under 93-91, and therefore will continue to be the built context. Whereas in Special West Chelsea District (SWCD) hard heights were embedded in the zoning text, in the SHYD, Hell’s Kitchen Subdistrict, heights are a function of the underlying zoning.

The R8A zone was a compromise since its height limit of 120 feet well exceeded the heights the 4 and 5 story tenements, at 50 and 60 feet respectively. But the R8A streetwall requirement, at 60 to 80 feet, made reinforced the built context. Two sites, (one on West 39th and 9th, the other

³ Attached affected rezoned areas with height and setback increases (**Appendix B**)

⁴ Attached East Chelsea affected zoning boundary map (**Appendix C**)

⁵ Attached 1996 Chelsea Plan (**Appendix D**)

⁶ HYPOA attached, dated January 10, 2005 (**Appendix E**)

midblock on West 37th) have been completed to date, with two other large sites on West 35th currently under construction. These 4 sites comprise 603 new apartments completed or currently under construction.

Increasing the height limit, even by 5 feet, in district which currently creates buildings twice the size of neighboring buildings, is simply not needed to ensure constructability. Even more damaging to neighborhood context would be the proposed increase in streetwall heights, currently 60 to 80 feet, to 100 feet. Such streetwalls would be double the height of adjacent 5 story tenements, dwarfing them in scale. Such a streetwall height is more appropriate to a loft district, not a medium density residential district, where infill will occur in protected built context.

MCB4 requests that SHYD, 93-542 be modified to include Zoning Text to establish height and setback limits consistent those established in the 2005 Hudson Yards Rezoning.⁷

Special West Chelsea District (SWCD)—Also in 2005, after working with MCB4 from 2003, the City Council adopted a rezoning of 17 blocks of former manufacturing area in West Chelsea Manhattan to create the SWCD. The 96 pages of zoning text are extremely detailed and specific regulations governing the transfer of development rights from the Highline, establishing subdistricts for bonuses or requirements for Highline access or improvements, acquiring park land and establishing Inclusionary Housing zones. The text even specifically calls out Highline adjacency volumes and permitted massings.

The main effort of the Chelsea community was balancing the proposed new development with establishing height limits and street wall requirements to respect the existing neighborhood context along 10th and 11th Avenues and the side streets from West 15th to West 30th Streets. The result was a SWCD with 10 subdistricts each setting forth specific and exacting requirements for massing, height and streetwalls.

All these efforts were codified in an agreement between the Mayor and City Council, the West Chelsea Points of Agreement (WCPOA)⁸. In that agreement, the western portion of West 23rd Street fronting 11th Avenue was rezoned and became part of Subdistrict C to include the height and streetwall requirements of the 11th Avenue corridor. However, the West 23rd Street corridor (from midblock West 22nd to West 24th Streets, 10th Avenue to 150 feet east of 11th Avenue) remained governed only by the underlying zoning. That zoning is a combination of C6-2A and C6-3A zones, R8A and R9A equivalents respectively⁹.

ZQA would increase in the C6-2A zone the streetwalls from the current 60 to 85 feet to 105 feet, an increase of 2 stories, but in the C6-3A only an increase of 3 feet. It would also increase the overall building height in of C6-2A from 120 feet to 125 feet and in the C6-3A from 145 feet to 155 feet, also an increase of 1 story. Again, as part of the overall negotiation on the SWCD, this corridor was left in the underlying zoning, without hard streetwall and height text limits, since the underlying zoning met community context. Changing the underlying zoning changes the

⁷ Attached proposed SHYD Zoning text (**Appendix F**)

⁸ Attached, dated June 20, 2005 (**Appendix G**)

⁹ Attached underlying zoning map, West 23rd Street Corridor (**Appendix H**)

context.

MCB4 requests that SWCD 98-423 and 98-50, be reverted to the original zoning text which includes height and setback limits in the West 23rd Street Corridor established and consistent with the agreements made in 2005 West Chelsea Rezoning.¹⁰

Ground Floors

MCB4 has seen extensive new construction throughout our entire district. A great deal of that construction has included ground floor commercial space, both on avenues and narrow side streets. These spaces have been occupied by all types of businesses (see appendix J), which are successful within the existing building envelopes and height controls. ***The ability to have successful commercial space is a function of the local retail market, not ceiling height.***

Creating higher ceiling heights for commercial spaces will create out of scale first floors to the context of surrounding existing buildings. Context creates one city of different style and periods, zoning should seek to harmonize, not emphasize their difference. MCB4 cannot support:

- ***Increase ground floor height to allow buildings with residential units on the ground floor to elevate unit windows above street level and to allow for the addition of retail spaces which require heights greater than the maximums currently in place.***
- ***Increase maximum height of Quality Housing buildings by 5 feet if the second floor begins at 13 feet or higher in all contextual zoning districts except R7B and R8B***

This proposed text should be deleted from the proposed ZQA.

Conclusion

The proposed ZQA zoning text is flawed at best. It is a one-size-fits-all approach for a complex city made up of diverse neighborhoods and districts, each with different and fine-grained needs. The approach is a blunt instrument for different communities whose real estate markets are simply not same. Encouraging residential development, for both market and affordable housing, requires different tools for Jerome Avenue in the Bronx, Atlantic Avenue in Brooklyn or 11th Avenue on the Westside of Manhattan.

The proposed ZQA zoning text ignores the context of decades of rezoning efforts on the Westside of Manhattan in the Chelsea, Hell's Kitchen and Clinton neighborhoods. All of these efforts balanced increased density and preservation of context in order to allow the city to grow while ensuring neighborhood survival and managing change. Since 1969, for nearly 50 years, our communities have worked in depth with rezoning and development proposals. Zoning and planning for the Westside of Manhattan in MCD4 must be developed within that context.

ZQA lumps together needed text changes to encourage the development of affordable senior housing with wholesale changes to contextual zones throughout the city. Its companion proposal, MIH, demands permanent affordability for a zoning bonus for bulk, yet grants the same bonus

¹⁰ Attached proposed SWCD Zoning text (**Appendix I**)

for senior housing with no such requirement. Such a basic contradiction of housing policy seeking permanent affordability makes no sense.

Proposed Changes in height, setback, and streetwall take into account only the current zoning district, not the built context within it. Running throughout the proposed text are the claims that such text changes are needed to allow for successful development. That may be the case in some areas of the city. However, residential development is galloping ahead under the current regulations in West Chelsea and Hudson Yards. It states ground floor commercial spaces cannot be properly developed within the current zoning envelope, when the reality is that on the Westside, recent developments include commercial spaces that are currently occupied by stores paying premium rents.

The proposal needs extensive revision to make it responsive to the diverse needs of the hundreds communities which make up the City of New York.

MCB4 looks forward to continuing discussions with the Department of City Planning, the Manhattan Borough President and the City Council on the proposed Zoning for Quality and Affordability zoning text. With revisions and modifications, taking the historical context of the past 10 years of city and private sector initiated zoning actions into account, MCB4 believes we can all work together to adequately address the needs and concerns of Chelsea, Hell’s Kitchen and Clinton communities of the Westside of Manhattan.

Sincerely,



Christine Berthet
Board Chair



Jean-Daniel Noland, Co-Chair
Clinton/Hell’s Kitchen Land Use Committee



Betty Mackintosh, Co-Chair
Chelsea Land Use Committee



Lee Compton, Co-Chair
Chelsea Land Use Committee



Joe Restuccia, Co-Chair
Housing, Health & Human Services Committee

[Signed 11/25/2015]
Barbara Davis, Co-Chair
Housing, Health and Human Services Committee

cc: J. Nadler, US Congress
B. Hoylman, State Senate
A. Espaillat, State Senate
D. Gottfried, State Assembly
L. Rosenthal, State Assembly
C. Johnson, City Council
H. Rosenthal, City Council
V. Been, HPD
L. Carroll, HPD
D. Hernandez, HPD
E. Hsu-Chen, DCP
F. Ruchala, DCP
K. Grebowiec-Hall, DCP

MANHATTAN COMMUNITY BOARD FIVE

Vikki Barbero, Chair

450 Seventh Avenue, Suite 2109
New York, NY 10123-2199
212.465.0907 f-212.465.1628

Wally Rubin, District Manager

November 13, 2015

Hon. Carl Weisbrod
Chair of the City Planning Commission
22 Reade Street
New York, NY 10007

Re: Resolution on the Zoning for Quality & Affordability Text Amendment.

Dear Chair Weisbrod:

At the monthly meeting of Community Board Five on Thursday, November 12, 2015, the Board passed the following resolution with a vote of 31 in favor, 0 opposed, 1 abstaining:

WHEREAS, The Department of City Planning proposes a text change to the Zoning Resolution that seeks to improve the quality and affordability of new buildings; and

WHEREAS, DCP seeks to make it easier to provide the range of affordable senior housing and care facilities needed to meet the varied needs of an aging population, and to help seniors remain in their communities; and

WHEREAS, DCP wants to enable Inclusionary Housing buildings, which provide mixed-income housing, to construct quality buildings that fit the full amount of housing they are allowed under zoning today; and

WHEREAS, DCP would like to reduce unnecessarily high costs of building transit-accessible affordable housing, and make taxpayer dollars go further toward meeting our affordable housing goals; and

WHEREAS, DCP wants to change rules that lead to flat, dull apartment buildings, to accommodate and encourage façade articulation, courtyards, and other elements that provide visual variety and make the pedestrian experience more interesting; and

WHEREAS, DCP believes these changes would encourage better ground-floor retail spaces and residential units with adequate ceiling heights; and

WHEREAS, CB5 believes that if DCP seeks a greater amount of ground floor retail, the department should consider requiring ground floor retail for properties on wide streets taking advantage of the increased height allowed under ZQA; and

WHEREAS, There are many positive policy changes within ZQA including elimination of a special permit for nursing homes, elimination of the 400 sq ft minimum unit size for residences and the modifications; and

WHEREAS, By designating all R10 Program areas as Inclusionary Housing Designated Areas (in Appendix F of the Zoning Resolution), there would be greater affordable housing production in Manhattan Community

District 5 and a greater share of the affordable units subsidized by the 421-a tax exemption would be permanently affordable (as opposed to the current situation where many publicly subsidized units will revert to market-rate after 35 years); and

WHEREAS, Though CB5 in its comments on the draft scope of work for the EIS and in subsequent discussions with DCP has expressed its position that all R10 program areas in Manhattan Community District 5 should become Inclusionary Housing Designated Areas, DCP has declined to modify the voluntary inclusionary housing program through ZQA which unfortunately will leave many permanently affordable units on the table; and

WHEREAS, The proposed Zoning Text Amendment would bring the maximum as-of-right height in the Ladies Miles Historic District from 185 feet to 225 feet, a drastic height increase that may encourage development proposals that are not historically contextual; and

WHEREAS, The current height, setback, rear yard rules were revised recently (2004) and allow a flexible enough building envelope to generate affordable housing especially in conjunction with the 74-711 special permit; and

WHEREAS, Changing the height limits could have a detrimental impact on the historic district and its scale; and

WHEREAS, Because inclusionary housing development in the Ladies Mile Historic District oftentimes now seeks a special permit which affords CB5 and the City Council the opportunity to negotiate such terms as affordable access for low-income tenants to such building spaces as a children's play room or roof common space, the proposed changes could make it more likely that new developments exclude low-income tenants from being full members of their building which would not further goal of integration; and

WHEREAS, The ZQA should leave the height regulations of the Ladies Mile Historic district unchanged; and

WHEREAS, While "Affordable Independent Residence for Seniors" would be entitled to build to 12 FAR, we are concerned that these residences for seniors may not be permanently affordable (and that the time line for affordability would only be subject to negotiations with the NYC Department of Housing Preservation & Development, the results of which community boards would have no opportunity to comment)

RESOLVED, Manhattan Community Board Five **recommends denial unless** the following conditions are met:

- 1) The R10 program areas in Manhattan Community District 5 are designated as Inclusionary Housing Designated Areas pursuant to Appendix F of the Zoning Resolution; and
- 2) The existing height maximums should remain in the Ladies Mile Historic District
- 3) For a developer to build "Affordable Independent Residence for Seniors," the zoning text must require that the site be permanently affordable for the life of the building

Thank you for the opportunity to comment on this matter.

Sincerely,



Vikki Barbero
Chair



Eric Stern
Chair, Land Use, Housing and Zoning Committee

RICHARD EGGERS
CHAIR

VICE-CHAIRS
CLAUDE L WINFIELD, 1ST
MOLLY HOLLISTER, 2ND



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DAN MINER
DISTRICT MANAGER

CHARLES BUCHWALD, TREASURER
BEATRICE DISMAN, ASST. TREASURER

KATHY THOMPSON
SECRETARY
AARON HUMPHREY
ASST. SECRETARY

VIA E-MAIL: cweisbrod@planning.nyc.gov

November 19, 2015

Mr. Carl Weisbrod
Chairman
Dept. of City Planning
22 Reade Street
New York, NY 10007

RE: DCP ULURP Applic. N160049ZRY Zoning for Quality and Affordability and Mandatory Inclusionary Housing Text Amendment

Dear Chairman Weisbrod:

At the November 18th Full Board meeting of Community Board 6 the Board adopted the following resolution:

Whereas, the Mayor has proposed a plan entitled Housing New York which is a ten-year plan for the construction of 80,000 new units of affordable housing and the preservation of 120,000 existing units of affordable housing; and

Whereas, the range of initiatives the Mayor has set forth includes two city-wide zoning text amendment proposals known as Zoning for Quality and Affordability (ZQA) and Mandatory Inclusionary Housing (MIH); and

Whereas, the ZQA text amendment will:

- Increase available floor area for developments that include affordable senior housing
- Remove parking requirements for affordable housing developments
- Modify height and setback restrictions in contextual districts;
- Make provisions of permanent affordable housing a requirement for any development involving new construction, enlargement or conversion that requires a rezoning; and

Whereas, the ZQA text amendment allows developers to construct affordable senior citizen apartments as small as 250 square feet for its residents across the City of New York; and

Whereas, the ZQA text amendment increases the density, floor area, height and dwelling unit count of affordable senior housing across the City of New York, which will significantly diminish air, light, open space and living space; and

Whereas, the MIH text amendment offers the following options by way of rezoning or special permits:

1. 25% affordable housing at 60% AMI
2. 30% affordable housing at 80% AMI
3. Option 1 or 2 and 30% affordable housing at average of 120% AMI in Manhattan CB 9-12 only (workforce option); and

Whereas, the MIH text amendment allows real estate developers to propose a building or building segment containing either residential affordable floor area or a supportive housing project, which generates floor area compensation generating sites which contain affordable housing units and allows real estate developers utilizing (“generating sites”) to seek public funding; and

Whereas, the MIH text amendment requires distribution of affordable housing units in new construction affordable housing or substantial rehabilitation affordable housing in a specific, equitable manner; and

Whereas, the MIH text amendment generally states that any affordable housing units other than supportive housing units or affordable independent residences for seniors shall be distributed in a specific, equitable manner; and

Whereas, in Mandatory Inclusionary Housing areas the “affordable housing fund” is a fund administered by HPD, all contributions to which shall be used for development, acquisition, rehabilitation, or preservation of affordable housing, or other affordable housing purposes as set forth in the guidelines; and

Whereas, a development, enlargement, or conversion from non-residential to residential use that increases the number of dwelling units by no more than 25, and increases residential floor area on the zoning lot by less than 25,000 square feet, may satisfy the requirements of this Section by making a contribution to the affordable housing fund. The amount of such contribution shall be related to the cost of constructing an equivalent amount of affordable floor area, as set forth in the guidelines; and

Whereas, the current administration has stated a goal of creating 200,000 units of affordable housing, but has, to date, offered no planning process to study the impacts of this increase in density; and,

Whereas, increasing the permissible height of a building by as much as 40 feet may have an undesirable impact on light and air on the street; and,

Whereas, without studying the impacts of the new bulk provision that would arise from the proposed zoning text amendments, we are dealing with an infinite number of potential issues;

Now, therefore, be it

Resolved, that Community Board Six does not support the text amendments as currently drafted, since they fail to address too many vital steps in planning and process, thus potentially undermining their desired results; and

Resolved, that Community Board Six requests that in all requirements for MIH sites proposed in the text amendment to also apply to “generating sites” to ensure that developers be required to create affordable housing within the community district where the development project is located; and be it further

Resolved, that Community Board Six requests that requirements for MIH sites also apply to “generating sites” to ensure that developments built on the same site or within the same building of the development project share a common lobby, entrances, amenities, and any other common facilities between market rate and affordable units, so that these units remain indistinguishable, one from the other; and be it further

Resolved, that Community Board Six requests that developers should not be eligible to apply for the 421-a program if they are participating in the generating site or MIH site program; and be it further

Resolved, that Community Board Six requests that affordable senior housing and care facilities benefits under Zoning for Quality and Affordability should be made permanent; and be it further

Resolved, that Community Board Six requests the workforce option under Mandatory Inclusionary Housing Sites be available to Community District Six as well as Community Districts 1 through 8; and be it further resolved

Resolved, that Community Board Six requests the workforce option be increased to an AMI average above 130%; and be it further

Resolved, that Community Board Six requests that the hardship relief application become more restrictive and that the agency overseeing the application review process be independent of HPD to ensure accountability and transparency; and be it further

Resolved, that Community Board Six requests that developers be required to relocate tenants currently living in buildings targeted for development into the new development project upon completion at affordable housing rates, without the requirement of adhering to the affordable housing income requirements; and be it further

Resolved, that Community Board Six requests that the text amendment includes specific considerations to set aside affordable housing units within generating sites or MIH sites for current and former members of the armed forces (“Veterans”) and such units should be no less than 2% of the total number of units in the development; and be it further

Resolved, that Community Board Six requests HPD to be transparent as to the allocation of funds from the ‘affordable housing fund’ by developers taking advantage of the less than 25 units/less than 25,000 feet residential floor area requirements; and, be it further

Resolved, that Community Board Six requests that zoning lot mergers include a height limit under ZQA; and, be it further

Resolved, that Community Board Six requests that the rear yard provisions be maintained and not permitted to be reduced under ZQA so that the public and occupants can continue to experience as much open space as possible; and, be it further

Resolved, that Community Board Six requests an additional 90 days to review the proposed changes to the zoning text amendment to fully study the impacts of the proposed revisions in our community district; and, be it further

Resolved, that Community Board Six requests that the City of New York implement a planning process to study the impact of the proposed city-wide goal of 200,000 units of affordable housing to determine how many market-rate units are projected to be produced; where these units are likely to be built; and what their impact will be on school seats, open space, public transit, traffic, and existing infrastructure.

VOTE: 33 in Favor 0 Opposed 3 Abstention 0 Not Entitled

Yours truly,



Dan Miner
District Manager

Cc: Hon. Bill de Blasio
Hon. Gale Brewer
Hon. Melissa Mark-Viverito
Hon. Dan Garodnick
Hon. Ben Kallos
Hon. Rosie Mendez
All 58 Community Boards
Rajesh Nayar
Terrence O'Neal



RESOLUTION

Date: November 4, 2015

Land Use Committee, Richard Asche and Page Cowley, Co-Chairpersons

Joint with Housing Committee, Nick Prigo, Chairperson

Re: Zoning for Quality and Affordability (ZQA) text amendment.

Disapproval unless the following changes are made.

Full Board Vote: 33 In Favor 0 Against 0 Abstentions 0 Present

The amendment to the Zoning Resolution proposed by the Department of City Planning and titled "Zoning for Quality and Affordability" (ZQA) has the twin goals of encouraging development of affordable housing, particularly for seniors, and improving building design. Community Board 7/Manhattan applauds the effort and shares DCP's goals. However, the proposed Amendment contains certain undesirable features, as detailed below, which prevent CB7 from endorsing the proposed amendment as it is currently drafted. Additionally, provisions in ZQA intended to improve building design do not allow sufficient flexibility to encourage truly superior architecture.

1. Affordable and Senior Housing:

The proposed amendment would permit an increase in floor area ratio (FAR) for buildings providing affordable senior housing and long-term care facilities. In R-10 and R-10A zones the increase would be 20% from 10FAR to 12 FAR; somewhat smaller increases would apply in zones permitting lower FAR. The proposed amendment recognizes that it is frequently difficult for a developer to utilize all of the increased FAR allowable for senior housing without increasing the permitted height of the affected buildings. Accordingly, DCP is proposing to increase the maximum height of buildings in various zoning categories by 20-40' feet in contextual districts, and by comparable amounts in non-contextual districts. The height increases would apply on both wide and narrow streets and in historic districts (subject to a Certificate of Appropriateness permit from the Landmarks Commission). The relaxation of height restrictions would also apply to narrow (45' or less), or "sliver," buildings. DCP is also proposing to increase the maximum base height to minimize the effects of an increase in total height; and to permit shared accessory space on the ground floor and in rear yard areas (other than in "B" districts). Maintenance of the building for senior affordable housing would be for a period of 30 years.

CB7 findings and recommendations For Affordable Senior Housing: CB7 supports the general goal of encouraging affordable Senior Housing and long-term care facilities, and recognizes that there is a growing need, particularly in the CB7 district for such facilities. Modest changes in maximum height, intended to encourage development of senior facilities only are acceptable. However, CB7 **opposes** the following proposed height increases:

- Maximum height increases on narrow streets-- narrow streets in the CB7 district have a distinctive appearance which would be threatened by new buildings of excessive height;
- Maximum height increases in historic districts- CB 7 believes that the Landmarks Commission is ill-equipped to balance the social goal of increased senior housing against the aesthetic goal of preservation of the historic districts;
- Maximum height increases for sliver buildings-- generally, sliver buildings are limited in height to the width of the facing street and CB 7 believes that this restriction should continue to apply to all developments.

Additionally, CB7 **opposes** the limitation of the requirement for affordable senior housing to 30 years, and urges that such housing be made a requirement in perpetuity.

If the foregoing proposed height increases were eliminated CB 7 would support the proposed zoning amendment with respect to Affordable Senior Housing.

2. Inclusionary housing areas:

The proposed amendment would provide for an increase in the maximum heights of buildings in providing inclusionary (affordable) housing. In CB7, these areas generally are the West End Avenue-and Broadway corridors, and portions of Central Park West and Riverside Drive including side streets. As with the proposal for Affordable Senior Housing, the proposed amendment does not differentiate between wide and narrow streets. Height increases on narrow streets would be either 30 or 40'.

CB7 findings and recommendations for inclusionary housing areas: CB 7 continues to supports the general goal of the inclusionary housing program, but opposes the proposed maximum height increases for narrow streets, historic districts or sliver buildings for the reasons itemized in item 1 above.

3. Basic residential changes in maximum building heights:

The proposed amendment provides for an increase in maximum allowable building heights for all new developments in contextual and non-contextual districts. In contextual districts the increases are from 5-10' on both wide and narrow streets; for non-contextual districts the proposed increases range from 5-20', including a proposed 20' increase on narrow streets in R-8 districts.

CB7 findings and recommendations for changes in maximum building heights: CB 7 agrees that minor relaxation of the maximum height requirements for wide streets is appropriate but opposes any increase in maximum building heights on narrow streets.

4. Changes to the building envelope:

In addition to proposed changes in building heights, DCP is proposing a variety of changes in the building envelope requirements of the zoning resolution. These will:

- permit alignment to adjacent structures providing discretion to incorporate building features such as bay windows, solar shading elements or other types of façade articulation to extend 12" beyond the street wall / property line;
- encourage better ground floor retail space and or residential units with adequate ceiling heights;
- allow for increased height of the ground floor by 5', if the second level of the building begins at a height of 13';
- provide greater flexibility in the placement of recesses in the street wall facades and create entrance courts; and
- address irregular site conditions and shallow or sloping lots.

For buildings with residential units on the ground floor, the proposal would permit raising the height of the lowest residential floor with the option of leaving the lobby area to be at street level and providing interior access via interior stairs or the elevator. For buildings zoned for ground floor commercial space, the increased ceiling heights would encourage commercial use. To compensate for the increase height of the ground floor maximum building heights would be increased by 5'. The maximum base height would also be increased by 5'. In order to encourage higher floor to ceiling heights of 10', DCP also proposes to set a limit on the number of stories a building can rise.

Additionally, the proposal would modify street-wall regulations to require that buildings "line up" with immediately adjacent buildings, rather than buildings within 150' as currently provided. The proposal would also relax rear yard requirements to accommodate a deeper building.

The DCP proposal would also change rules for corner buildings, by increasing the maximum lot coverage from 80% to 100%, and would amend the current requirement that corner buildings step down or transition from their maximum permitted height to the permitted height in an adjacent lower density district for a distance of 25'. The proposed amendment would permit the step down to be set at the lower of the permitted height on the zoning map or 75'. DCP proposes to eliminate the rear yard requirement for corner buildings.

CB7 findings and recommendations for changes to the building envelope: CB7 welcomes the efforts by DCP to improve grade level appearance and for commercially feasible lots, increased retail space, increase the building height for the ground floor, relax rules for articulation, however, the location of where the additional 5' is located should be left to the discretion of the Architect and Owner to diversify both the appearance of the building and provide user amenity where it is best suited to the project requirements. This can include an intermediate floor that contains a building wide community space, fitness center, playroom or other associated residential activity and for senior housing create a mid-level cafeteria, library, visiting area or other associated communal space or suite of rooms. If the additional floor height were moved to the top level, this could create a roof terrace, with associated residential activity, and encourage the use of green roofs and sustainable architecture. Other areas that we believe are beneficial to a better streetscape and neighborhood appearance are the relaxation of the alignment regulations to be located no closer than the adjacent building and the opportunity for setbacks at the street wall up to 10' in non-contextual buildings and thereby encourage planting at the street wall; , relax rules for a step-down in height from corner buildings, and compensate for additional height of the ground floor by a modest increase (no more than 5') in building height.

CB 7 **opposes** elimination of the rear yard setback for any buildings.

CB7 **opposes** the proposed increase in lot coverage for corner buildings from 80 to 100%. Full lot coverage creates the risk of diminishing light and air, particularly in residential buildings. Should a developer believe that limiting lot coverage to 80% would create a hardship, the developer may apply for a variance from the BSA.

Although the proposed Quality-related amendments represent a significant step toward improving new building quality, CB7 is concerned that the proposal is still too rigid to permit novel and creative architecture, and urges DCP, working with architects and the Community Board, to revisit the proposal with a view toward greater flexibility. Recognizing that relaxation of zoning envelope rules runs the risk of inferior housing design, CB7 nonetheless believes that some mechanism should exist to permit the design of buildings to fit unique needs or conditions or to encourage superior architecture. One possible solution would be the establishment of a Special Permit system by which developers wishing to modify the rules for a particular building would be able to seek permission from DCP, after review by the Community Board. The significance of this requirement would be to design buildings that respond to specific and intimate neighborhood character and architecture regardless of whether the building is in a zoned contextual district, or not, with the aim to eliminate the tendency to create repetitive, unvaried and uniformly similar building and streetscape.

5. General comments:

CB7 is disappointed that DCP has not taken advantage of the opportunity afforded by a major proposed zoning amendment to review rules for zoning lot mergers and to construct more meaningful limitations on the height of buildings resulting from such transfers in areas where height restrictions do not exist.

CB7 urges the Department of City Planning, the Buildings Department and the Department of Housing Preservation and Development to coordinate enforcement of provisions relating to housing for seniors and affordable housing.

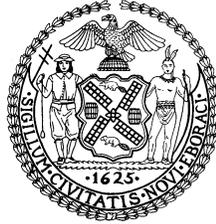
CB 7 urges that a comprehensive study of both ZQA and MIH be conducted periodically by the Department of City Planning in order to evaluate the results and effectiveness of the program in neighborhoods around the city and that such a study be available for public comment.

CONCLUSION

Community Board 7/Manhattan encourages DCP to make the changes suggested by this resolution. If all of these changes are made, CB7 could support the proposed amendment.

James G. Clynes
Chairman

Latha Thompson
District Manager



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November 25, 2015

Carl Weisbrod, Chair
City Planning Commission
22 Read Street
New York, NY 10007

Re: Zoning for Quality and Affordability (ZQA) N 160049 ZRY and Mandatory Inclusionary Housing (MIH) N 160051 ZRY Text Amendments

Dear Chair Weisbrod:

I write to you on behalf of Manhattan Community Board 8 in regards to the proposed citywide text amendments currently under public review known as Zoning for Quality and Affordability ("ZQA") and Mandatory Inclusionary Housing ("MIH"). I previously wrote to you, in a letter dated April 29, 2015, to highlight the concerns that Community Board 8 had with the text amendments. The following represents the continuing concerns of Community Board 8 as expressed at our Land Use Committee meeting held on November 10, 2015.

1) ZONING FOR QUALITY AND AFFORDABILITY

- Exemption from the "Sliver" Law

Allowing buildings with affordable housing or senior housing to be exempt from the Sliver Law - ZR 23-692 will lead to irreparable damage to the character and streetscape of the Upper East Side and other affected residential neighborhoods. It will also lead to the loss of affordable housing that these narrow buildings now contain.

The increases in the height limit for a building less than 45 feet wide under ZQA are as follows:

R10 and R10A districts, the increase in height is from 100 feet to 235 feet.

R9X districts (Lexington Avenue), the increase is from 75 feet to 205 feet.

R8B districts, the increase is from 60 feet to 75 feet.

Special Madison Avenue Preservation District, the increase is from 80 feet to 210 feet.

Special Park Improvement District, the increase is from 100 feet to 210 feet.

Under ZQA there is no incentive to build affordable or senior housing on sites more than 45 feet wide. Exempting sites from the Sliver Law creates an incentive to demolish the narrow buildings, most of which currently contain affordable housing. The gains in market-rate housing for a building less than 45 feet wide under ZQA illustrate this point:

R10 and R10A districts, the increase in market-rate housing is from 100 feet to 188 feet.

R9X districts (Lexington Avenue), the increase is from 75 feet to 164 feet.

R8B districts, there is no change from 60 feet.

Special Madison Avenue Preservation District, the increase is from 80 feet to 168 feet.
Special Park Improvement District, the increase is from 100 feet to 168 feet.

We must protect the applicability of the Sliver Law as a tool to protect neighborhood context.

- Contextual Zones

ZQA and bulk changes should not apply to Contextual Zones. The height limits in Contextual Zones are already generous and exceed the height of buildings whose configurations they are intended to replicate. Prewar apartment buildings upon which R10A is modeled average 160 to 180 feet in height. In R10A districts, the limit is 210 feet. ZQA proposes to add 5 to 25 feet, which will bring new buildings out of context with their neighborhoods. Encroachment in the rear yards should not be allowed, as it would negatively affect the enjoyment of the remaining open space amenity known as the “historic donut”.

- R9X (Lexington Avenue)

If Lexington Avenue were only one foot narrower, it would qualify as a “narrow street”. ZQA proposes to increase the building height by 15-45 feet. The current height limit is 160 feet, which is the maximum of what is appropriate on such a narrow avenue. The proposed 205 feet would seriously impact the character of Lexington Avenue.

The ZQA and bulk changes must maintain the building height difference and proportion between wide and narrow streets. Buildings on narrow streets that are the same height as or taller than buildings on the avenues negatively affect light and air to the side walk and surrounding buildings.

- Affordable Housing Net Loss and Net Increase

The current system of giving bonuses for building affordable housing can be self-defeating because the amount of affordable housing already existing on the development site is not taken into consideration. This leads to, and has led to in the past, a net loss of affordable housing. A bonus should be awarded for a net increase in affordable housing.

There is an affordable housing crisis in Community Board 8 that outpaces the rest of the city. Based on property tax bills, between 2007 and 2014, Community Board 8 experienced a net loss of 26% of affordable units; compared to 6% in New York City overall. 70% of those units were located east of Third Avenue, highlighting the particular threat to affordable housing in the neighborhoods of Lenox Hill and Yorkville. The area located east of Third Avenue is not protected by Historic Districts in the way that the area located west of Third Avenue is. Therefore, the incentive to leverage ZQA will be concentrated east of Third Avenue. Since ZQA does not require a net positive gain of affordable units it will lead to a net loss of units as buildings are torn down and replaced with buildings housing larger apartments, totaling fewer units resulting in the construction of fewer affordable units.

- Senior Housing and Inclusionary Housing

The Upper East Side needs a range of permanent affordable senior housing and continuum of care facilities to meet the growing aging population. Senior housing is not permanent, yet the height and FAR increases are permanent. There is a need to clarify the range of housing planned, number of units, issue of hardship regarding the Bureau of Standards and Appeals, affordability,

expansion of FAR in districts R3-R10, as of right development for nursing homes and senior facilities and mixed use housing with the general population. The R10 Voluntary Inclusionary Housing programs are not fixed but they are being used as the qualifying programs for additional height.

- Shadows

The DEIS for ZQA states that a shadow study shows a potential result in significant adverse shadow impacts to our most precious resources; historic architecture and open space. The zones that will be most sensitive to development based on ZQA maps are the avenues and major cross streets which is where our historic resources and parks are located.

- 197-a and c Plans

Development of 197-a and 197-c Plans should be accompanied by an urban design element to provide a 3-dimensional urban design context to any proposed zoning changes. Zoning changes should be based upon these plans.

2) MANDATORY INCLUSIONARY HOUSING

It appears that this proposal could lead to cases of unfortunate spot zoning at the request of a developer. There are possible sites within Community Board 8 that could be eligible for MIH. The City will have the discretion to apply one of three affordable housing options. None of these options would meet our AMI standards. All options mandate that no affordable unit exceed 130% AMI. If the program needs to be universal, then the AMI options are not broad enough or deep enough to fit all neighborhood needs.

We are concerned with the payment-in-lieu option and the fund regarding threshold criteria, time frame for use in the community, management, transparency, oversight and the funds being spent in areas outside of the district. And the preservation and rehabilitation of units should be included as an option for fund use.

On-site separate buildings provisions may be creating poor floors and or poor buildings. There should be a requirement for equal access, equal amenities and finishes.

3) Conclusion

Based on the board's discussion and analysis of both proposals conducted at three Zoning and Development Committee meetings and at our Land Use Committee Meeting, Manhattan Community Board 8 does not support either text amendment as currently drafted.

Sincerely,

James G. Clynes



Gale Brewer
President, Borough of Manhattan

Padmore John
Chair

Rev. Georgiette Morgan-Thomas
First Vice-Chair

Brad W. Taylor
Second Vice-Chair

Anthony Q. Fletcher, Esq.
Treasurer

Joel Mentor, Jr.
Assistant Treasurer

Feruze Zeko
Secretary

Theodore Kovaleff
Assistant Secretary

Eutha Prince
District Manager

CB9M

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COMMUNITY BOARD #9, MANHATTAN

Via Email: cweisbrod@planning.nyc.gov

November 24, 2015

Mr. Carl Weisbrod
Chairman
Department of City Planning
22 Reade Street
New York, New York 10007

**Re: DCP ULURP Application Nos...
N160049ZRY Zoning for Quality and Affordability Text Amendment
N160051ZRY Mandatory Inclusionary Housing Text Amendment**

Dear Chairman Weisbrod:

At its regularly scheduled General Board meeting held on Thursday, November 19, 2015, Community Board No. 9 (CB9) Manhattan approved the following **Resolution to Disapprove Text Amendments for Mandatory Inclusionary Housing (MIH) and Zoning for Quality and Affordability (ZQA)** by a vote of 28 in favor, 1 opposed, 3 abstentions and 2 Present not entitled to vote.

Whereas on September 21, 2015 the City Planning Commission (DCP) started the public review process for the above referenced text amendments by referring them to Community Boards giving them until November 30, 2015 to respond. CB9 views this as an unusually truncated timetable for such major changes.

Whereas, in order to receive feedback from our community, CB9 held public meetings of the Housing, Land Use and Zoning Committee (10/13/15 and 11/9/15), the Executive Committee (10/8/15) and General Board (10/15/15) at which these text amendments were presented by DCP, and HPD, and discussed and open to the public for comment. Even with these local efforts, we do not believe that such sweeping changes in zoning rules across the city should be undertaken without a more thorough investigation and further community outreach and input.

Whereas CB9 strongly agrees that there is a critical need for affordable housing, both owner-occupied and rental, in our community, as well as in the rest of the City. CB9 also recognizes that significant increases in the affordable housing stock in our community and others will not be achieved on a project-by-project basis or through one-off deal-making, but instead primarily by changing the mechanisms by which housing is financed and secondarily by zoning improvements. Critically, development of affordable housing in our community must be mandatory, integrated, and permanent, as we have too often seen developers opt out of current inclusionary housing initiatives, segregate residents of affordable units, build affordable units off site or leave affordable housing programs like Mitchell-Lama after an initial period of incentives expires.

Mr. Carl Weisbrod
November 24, 2015
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Whereas CB9 called for Mandatory Inclusionary Zoning in specific areas within our community district in our 197-a Plan (dated October 18, 2004. Revised June 17, 2005 and September 24, 2007).

Whereas CB9 understands that the DCP's MIH proposal includes "affordable" homeownership as an option in addition to affordable rental units. CB9 believes that homeownership should not be an option open only to those able to afford the often astronomical housing market prices in New York, and permanently affordable means-tested owner-occupied housing should be encouraged, either through limited-equity ownership or other mechanisms.

Whereas CB9 commends portions of the MIH proposal that require all applications for developments be submitted to the Community Board in which a development is proposed at the same time they are submitted to HPD. The continued involvement and voice of the community, through the Community Boards, must be included to ensure that the public interest is not harmed by new developments.

Whereas CB9 believes that our seniors are vital to our community, and that senior residents in the community ought to be able to continue to reside in this community as they age. CB9 supports making it easier for developers to construct permanently affordable senior housing.

Whereas additionally, CB9, while not endorsing taller building heights, supports many of the stated goals in the Zoning for Quality and Affordability (ZQA) proposal, including higher floor to floor heights and encouraging more interesting street wall articulation, which would be sympathetic to many of the early 20th century buildings in the District, as well as encouraging a livelier street life by making it easier for developers to include space suitable for retail uses on the ground floor of developments;

Whereas, despite our support of the above, CB9 has serious misgivings with the relatively short amount of time allotted for public review of what is one of the largest and most sweeping zoning text amendments ever proposed. Many of the provisions undercut restrictions found in contextual zoning and Quality Housing Regulations that help prevent out of control development that would destroy the character and livability of our communities. More time must be allowed for the public to study the over 500 pages of zoning text amendment that are included in the MIH and ZQA proposals. Additionally, there are many questions regarding the potential for these changes to incentivize the destruction of existing affordable housing, undercutting the very purpose of the proposed changes.

Therefore, be it resolved that, CB9 believes that many of the provisions contained in the proposals threaten to undo hard-won protections against out of context development or would result in construction of "affordable" units that remain out of reach for a majority of the community's residents.

Mr. Carl Weisbrod
November 24, 2015
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Per 2012 ACS data, 25.5% of households in Community District 9 (CD9) earn less than \$15,000 per year in both income and benefits, and 46.6% earn less than \$35,000 per year. However, the lowest Area Median Income (AMI) band included in the MIH proposal caps housing costs at those appropriate for households earning 60% of AMI (\$46,620 for a family of three). For truly affordable housing for CD9 residents, a band closer to 40% of AMI (\$31,080 for a family of three), would have to be included in an MIH proposal.

Be it further resolved that CB9 does not support provisions in the MIH text amendment that would allow developers to receive more than 20% Floor Area Ratio bonuses for less than 20% of the building being devoted to affordable units.

While CB9 is not opposed, in principle, for additional FAR to be awarded to developers building affordable senior housing, such housing should be permanently affordable and not allowed to return to market rates after an initial period of 30 years seeing as the additional FAR cannot be withdrawn after the same 30-year period.

Be it further resolved that CB9 also opposes provisions in the ZQA text amendment that remove the distinction between the development allowed on narrow streets vs. wide streets. While bulkier, denser development may be appropriate on 125th or 145th Streets, such developments would be wholly out of context on many of the less dense blocks of townhouses or apartment buildings found throughout CD9.

CB 9 also strongly opposes lifting restrictions on side-street lots of 45' or less ("sliver lots") limiting the height of buildings constructed on such lots to the width of the street or 100', as these restrictions prevent out-of-context and aesthetically inappropriate buildings on residential side streets.

Furthermore, the Board has reservations about removing requirements for backyard space for buildings. These requirements preserve access to light and fresh air for many residents, who under the current proposal could find multi-story walls of new developments directly abutting their rear yards. Rear yards also help divert storm water runoff away from the sewer system, which is a major concern for a community which regularly must deal with pollution and sewage releases during heavy rains.

Be it further resolved that both the ZQA/MIH proposals do not speak specifically to the role that there will be inter-agency assurance that the already threatened and dwindling affordable housing stock that exists will not be further threatened by these potential development pressures. And that there will be sufficient anti-harassment measures in place to counter those.

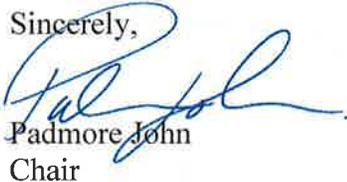
Be it further resolved that CB9 requests that the period for public comment be extended to allow for additional study, particularly of the possible impacts the proposals may have on existing affordable units and of the possibility that the proposals could encourage the tearing down of existing high-quality housing stock already in our community.

Mr. Carl Weisbrod
November 24, 2015
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In conclusion, be it resolved that CB9, while supporting and lauding many of the goals that the Mandatory Inclusionary Housing and Zoning for Quality and Affordability text amendments seek to achieve, cannot support the proposals in their current forms.

If you have any questions please feel free to contact me or District Manager, Eutha Prince at (212) 864-6200.

Sincerely,



Padmore John
Chair

cc: Hon. Bill DeBlasio, Mayor
Hon. Charles Rangel, Congressman
Hon. Gale Brewer, Manhattan Borough President
Hon. Bill Perkins, State Senator
Hon. Adriano Espaillat, State Senator
Hon. Keith Wright, Assemblymember
Hon. Daniel O'Donnell, Assemblymember
Hon. Herman D. Farrell, Jr., Assemblymember
Hon. Mark Levine, City Councilmember
Hon. Inez Dickens, City Councilmember
Community Boards Nos. 1-58
Beth Lebowitz, Director, Zoning Division-DCP
Edwin Marshall, Planning-DCP
James Caras, General Counsel/Director, Land Use, MBPO
Lucian Reynolds, Land Use, MBPO



CITY OF NEW YORK
MANHATTAN COMMUNITY BOARD 10
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HENRIETTA LYLE
Chairperson

ANDREW LASSALLE
District Manager

November 6, 2015

Mr. Carl Weisbrod
Commissioner
New York City Department of City Planning
22 Reade Street
New York, NY 10007

Re: Proposed zoning text amendments: “Mandatory Inclusionary Zoning” and “Zoning for Quality and Affordability”.

Dear Chair Weisbrod:

Harlem residents are deeply concerned about the lack of affordable housing in our neighborhood and across the city. Enabling more affordable housing is an urgent priority for Manhattan Community Board 10 and we are glad that this is the stated goal of the administration in proposing the MIH and ZQA zoning text amendments.

However we are concerned that the Department of City Planning has not reached out to this Board while crafting the MIH and ZQA proposals, and that the public review process is unduly rushed. We have not been given the necessary time, tools or resources to fully grasp all the nuances of these highly technical and complex proposals. We regret this and cannot in good conscience take a vote to support or oppose the MIH and ZQA zoning text amendments.

Our dissatisfaction with the process has not stopped us from hearing a number of concerns with the MIH and ZQA proposals, and we would do a disservice to the Community that we represent if we did not raise them. We urge to take note of these concerns and to amend the MIH and ZQA proposals in response.

Concerns with MIH

- Requiring 25% or 30% of the units to be affordable is a step in the right direction, but it is too small. At minimum developments benefitting from rezoning should be required to provide 50% of the units as affordable.
- Affordable units should be targeted to very low-income and low-income households. This is what Harlem needs most desperately.
- MIH should also include opportunities for homeownership.
- If the affordable units are built off-site, the construction schedules should be required to ensure that affordable units are completed before or at the same time as the market-rate units.

- Units built off-site should be in the Community District or within a half mile in the same borough. Currently the half mile allowance could place the affordable units in the Bronx, which would defeat the purpose of having a community board preference in the application process for affordable housing.
- Eliminate the payment in lieu option for small buildings and require 50% of the units to be affordable.
- Require 50% affordability in small buildings, regardless of the number of units.
- Ensure that permanent affordability requirements are properly recorded, monitored, and that there are adequate enforcement mechanisms.
- Require a plan for the continued investment into permanently affordable housing. As buildings age, their capital needs will increase. If there is no plan to shore up buildings, they will deteriorate the way that public housing has deteriorated. We are concerned about the effect this will have on residents and the potential for rescinding the affordability requirements in order to attract private investment.

Concerns with ZQA

- There should be additional incentives for senior affordable housing relative to “regular” affordable housing. If the incentive for the two is to waive the mandatory parking requirements, developers will never build senior housing.
- Parking waivers for senior and affordable developments are permanent, so the housing that this facilitates should also be required to be affordable and senior housing in perpetuity. Parking waivers are an invaluable incentive which, once awarded, cannot be taken away. We want to prevent scenarios where parking is waived to promote senior or affordable housing but after a few years the housing becomes market-rate.

We hope that these concerns will be taken into consideration in a meaningful way, and we look forward to working proactively with the Department of City Planning in the future to find solutions to the housing needs of Harlem and of our city.

Sincerely,

Henrietta Lyle
Chairperson
Manhattan Community Board 10

Brian Benjamin
Chair of Land Use
Manhattan Community Board 10

Barbara J. Nelson
Chair of Housing
Manhattan Community Board 10

Cc: Gale Brewer, Manhattan Borough President
Inez Dickens, Council Member



Diane Collier
Chair

Angel D. Mescain
District Manager

COMMUNITY BOARD ELEVEN

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RESOLUTION

Date: November 23, 2015

Committee of Origin: Executive

Full Board Vote: 29 In Favor, 2 Opposed, 1 Absentions, 0 Present/Not Voting

Resolution on the Proposed Zoning for Quality and Affordability Plan

WHEREAS, the development of new and preservation of existing affordable housing is one of the foremost concerns for East Harlem and New York City (“NYC”) at-large;

WHEREAS, the cost of living in NYC has been increasing, the demand for housing has outpaced the supply of housing and the growth and desire for luxury development has posed immense hardships for many NYC—and specifically East Harlem—residents who desperately wish to remain members of their community;

WHEREAS, affordable senior housing is a particularly grave concern as East Harlem’s and NYC’s senior population require both improved and increased affordable housing dedicated to their population;

WHEREAS, Community Board 11 of Manhattan (“CB11”), on behalf of the East Harlem community, has persistently advocated to local, state and federal officials that affordable housing must be both expanded and preserved;

WHEREAS, governmental and political leaders desire to address the lack of affordable housing by promoting increased development of affordable housing units through changes to the NYC Zoning Resolution as well as through other initiatives that comprise “Housing New York,” NYC Mayor Bill de Blasio’s housing plan;

WHEREAS, the NYC Department of City Planning has proposed the implementation of the Zoning for Quality and Affordability Plan (“ZQA”) to improve and modernize the Zoning Resolution, specifically to promote the development affordable senior housing and related care facilities as well as to improve the quality of residential and commercial development that reflect current development practices and improve the urban environment;

WHEREAS, CB11 has consulted with various stakeholders, including representatives of DCP and other NYC agencies, and has evaluated the proposal in consultation with members of the public, including residents, neighbors and friends of East Harlem;

WHEREAS, a public hearing on this matter was held on November 9, 2015, where CB11 heard from other members of the public and their views of ZQA;

WHEREAS, CB11 has recognized the benefits ZQA offers to the East Harlem community but has also identified a number of deficiencies in ZQA that, if addressed and corrected, would substantially improve the purpose of and anticipated result of ZQA and further benefit the East Harlem community;

THEREFORE BE IT

RESOLVED, that ZQA’s proposal to permit the removal of existing parking in a “transit zone” that meets the parking requirements for all housing units should be subject to review by the New York City Board of Standards and Appeals so as to ensure a standardized process for the removal of all types of existing parking requirements, as well as to require community board input on such decisions;

FURTHER RESOLVED, that affordable senior residences outside Mandatory Inclusionary Housing areas developed using ZQA’s floor area bonus should have permanent affordability as is provided to affordable housing that created under the Mandatory Inclusionary Housing program.

FURTHER RESOLVED, that ZQA’s reliance on transit zones should be reevaluated to further consider the appropriateness of including northern Manhattan, including East Harlem, within the same transit zone definition as the outer boroughs; northern Manhattan, including East Harlem, is generally higher density with better access to, and use of, transit and a finer grained approach to the goals of the transit zones is appropriate in East Harlem, especially as it relates to parking requirements for market-rate housing;

FURTHER RESOLVED, the minimum unit dwelling size of 400 square feet should be restored, and no smaller minimum unit dwelling size should be proposed under ZQA.

FURTHER RESOLVED, that ZQA’s proposed revision to the Zoning Resolution to reduce the required spacing between residential buildings –on the same zoning lot should not extend to zoning lots currently owned and/or operated by NYC agencies, including developments owned and/or operated by the New York City Housing Authority, and, instead, any such revisions to the Zoning Resolution should be addressed separately as part of a broader community-driven plan specific to such zoning lots; and

FURTHER RESOLVED, that CB11, on behalf of the East Harlem community and upon extensive consideration of ZQA’s potential effects on East Harlem, does not support or express approval of ZQA, unless the articulated concerns in the foregoing resolutions are met.



Community Board 12 - Manhattan Washington Heights & Inwood

530 West 166th St. 6th Floor, New York, NY 10032

Phone: (212) 568-8500, Fax: (212) 740-8197

Website: www.nyc.gov/mcb12

George Fernández Jr. - Chairman
Ebenezer Smith, District Manager

Amended

Dec 2, 2015

Hon. Carl Weisbrod, Director
NYC Department of City Planning
Equitable Life building
120 Broadway 31st Fl.
New York, NY 10271

Hon. David Quart
Deputy Commissioner of Strategy,
Research & Communications
NYC Dept. of Housing Preservation & Dev.
100 Gold Street Rm 5-P1
New York, NY 10038

Dear Director Weisbrod & Dep. Commissioner Quart:

Please be advised that on Tuesday, November 24, 2015 at the General Meeting of Manhattan Community Board 12 a resolution passed with a majority vote of (29) In Favor, (0), Opposed, and (0) Abstain of not supporting the Zoning Quality Affordability text Amendments for these reasons; The proposed ZQA and MIH zoning text amendments require further study and refinement before they are considered for implementation. In its review to-date of ZQA and MIH the Manhattan Borough President's office ("MBPO") has identified certain deficiencies in the proposed text amendments.

For ZQA the deficiencies include: the "two-door"/"poor door" option remains; loose provisions with respect to off-site affordable units; the FAR bonus does not take into account neighborhood character and is the same everywhere; double-dipping is allowed with the 421-A program and there are inconsistent provisions for community review. For MIH the deficiencies are: the absence of anti-harassment requirements; a loop-hole that allows BSA to waive affordable housing requirements; an undefined trigger for "substantial new residential density"; and lowering the unit threshold that applies to a special permit for the option of payment in lieu of providing affordable housing. The MBPO also notes that ZQA and MIH do not address New York City Housing Authority developments, which house over 115,000 residents in Manhattan alone; and

Whereas:

As part of the City of New York's coordinated efforts under Housing New York, Mayor de Blasio's five-borough housing plan, the Department of City Planning ("DCP") is proposing a set of targeted zoning regulations to support the creation of new affordable housing and encourage better residential buildings. The targeted zoning regulations include Zoning for Quality and Affordability ("ZQA") and Mandatory Inclusionary Housing ("MIH"). ZQA seeks to advance numerous goals of Housing New York, including making the city more affordable to a wide range of New Yorkers, and fostering diverse, livable communities with buildings that contribute to the character and quality of neighborhoods. It aims to address several ways in which current zoning, drafted a generation ago, has in practice discouraged the affordability and quality of recent buildings. MIH is a new proposal to use zoning to require permanent affordable housing when future DCP actions encourage substantial new housing. It would require, through zoning actions, a share of new housing to be permanently affordable. Affordable housing would be mandatory, not voluntary and would be a condition of residential development when developers build in an

area zoned for MIH, whether zoned as part of a City neighborhood plan or a private rezoning application; and

Whereas: The goals of ZQA include promoting senior housing, reducing parking requirements for affordable housing and modifying the contextual building envelope. The goals of MIH include: promoting vibrant, diverse neighborhoods; ensuring affordable housing in areas in which DCP is planning for growth; meeting the needs of a range of low- and moderate income New Yorkers; ensuring that the MIH program meets legal standards, is applied consistently and supports the financial feasibility of housing creation; and

Whereas: The goals of ZQA and MIH are commendable, but these proposed text amendments will have broad, city-wide impacts and do not consider how these impacts will affect individual neighborhoods. Further, DCP has afforded community boards insufficient time to carefully and thoroughly review the proposed text amendments and to coordinate with the offices of their respective borough presidents, who are required to undertake their review of ZQA and MIH as the same time as the community boards; and

Whereas: DCP introduced the ZQA and MIH text amendment proposals for public review on September 21, 2015. Comments from community boards and from borough presidents are due by November 30, 2015. DCP presented the ZQA and MIH proposals to the Land Use Committee ("Land Use" or the "Committee") of Community Board 12- Manhattan at its November 4, 2015 meeting and also briefed the Committee on ZQA at its June 3, 2015 meeting. At the June 2015 briefing the Committee identified various concerns including: how affordable housing is defined and why nursing homes are included with affordable housing as opposed to healthcare facilities; the extent of communication and coordination between offices of New York City and New York State concerning New York State's long term plans for reducing the number of nursing home beds and how this reconciles with zoning changes that incentivize development of nursing homes; the analysis undertaken to support the recommendation to eliminate the parking requirement for new affordable housing developments; the impact of eliminating the parking requirement for new affordable housing on on-street parking and traffic congestion; why the development of micro-units appears to be encouraged and incentivized; and the absence of consideration to specific neighborhood characteristics and planning needs. The Committee requested that these concerns be relayed to DCP senior management. The Committee did not receive any response from DCP prior to its November 2015 meeting and the presentation made by DCP in November 2015 did not reflect any modifications to the zoning text proposal that responded to the concerns raised by the Committee; and

Whereas At the November 2015 presentation the following additional comments and concerns were raised with respect to ZQA and MIH.

1. The uniform application of the text amendments will have a disparate impact on low-income communities and will gradually promote displacement, decreased affordability and change neighborhood character.
2. The zoning changes made under ZQA encourages, but does not require the design of buildings with more interesting, articulated facades which leaves open the possibility and likelihood that new buildings constructed will be larger, but not more architecturally attractive.
3. The area median income (AMI) levels that apply to affordable units should not be based on "an average" percentage of AMI but a "not to exceed" percentage of AMI, should be tied to the AMI of the community district in which a project is to be developed, and the rent/income levels of affordable units should be tiered and not allowed to be concentrated near the upper income/rent limit.
4. Community Boards should have a role in the MIH application review process and should be consulted on which AMI options best fits the needs of its community.
5. There should be a 50% community preference for units developed under the MIH and ZQA.
6. Affordable units developed under MIH and ZQA should be permanently included in the rent stabilization system so that tenants are guaranteed lease renewals and rent increases are determined by the Rent Guidelines Board.

7. The assumption that parking spaces contained within affordable housing developments are underused due to unaffordable monthly fees is not supported with any documentation presented to the Committee, appears to be based on a limited sample of development projects that may be skewed towards low-income senior housing, and must be subjected to further, more detailed, transparent and inclusive research.
8. MIH allows the Board of Standards and Appeals ("BSA") to waive the affordable housing requirements; this defeats the purpose of MIH and should be eliminated.

Whereas: In its review to-date of ZQA and MIH the Manhattan Borough President's office ("MBPO") has identified certain deficiencies in the proposed text amendments. For ZQA the deficiencies include: the "two-door"/"poor door" option remains; loose provisions with respect to off-site affordable units; the FAR bonus does not take into account neighborhood character and is the same everywhere; double-dipping is allowed with the 421-A program and there are inconsistent provisions for community review. For MIH the deficiencies are: the absence of anti-harassment requirements; a loop-hole that allows BSA to waive affordable housing requirements; an undefined trigger for "substantial new residential density"; and lowering the unit threshold that applies to a special permit for the option of payment in lieu of providing affordable housing. The MBPO also notes that ZQA and MIH do not address New York City Housing Authority developments, which house over 115,000 residents in Manhattan alone; and

Whereas: The proposed ZQA and MIH zoning text amendments require further study and refinement before they are considered for implementation. Now, therefore,

Be It Resolved: Community Board 12-Manhattan understands and appreciates the goals set-forth for the Zoning for Quality and Affordability and Mandatory Inclusionary Housing zoning text amendments. However, it does not support the text amendments as they are currently drafted, but could support them if they are modified to satisfactorily address the various comments and concerns contained in this resolution and urges the Department of City Planning to make these modifications.

Sincerely,


George Fernandez, Jr., Chair
Manhattan Community Board 12

cc: Hon. Bill de Blasio, Mayor
Hon. Gail Brewer, Manhattan Borough President
Hon. Letitia James, Public Advocate
Hon. Scott Stringer, Comptroller
Hon. Charles B. Rangel, Congressman
Hon. Bill Perkins, NY State Senator

Hon. Adriano Espaillat, NY State Senator
Hon. Herman D. Farrell, Jr., Assembly Member
Hon. Guillermo Linares, Assembly Member
Hon. Ydanis Rodriguez, Council Member
Hon. Mark Levine, Council Member



City of New York Community Board #1, Queens

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Melinda Katz
President, Queens
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Director, Community Boards
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Florence Koulouris,
District Manager

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Jose Batista
Zoning & Variance
John Carusone

November 13, 2015

Hon. Carl Weisbrod, Chair
City Planning Commission
22 Reade Street
New York, New York 10007

RE: N160049 ZRY Zoning for Quality and Affordability zoning text amendment

Dear Chair Weisbrod:

Community Board 1 Queens (CB1Q), after a duly advertised public hearing held during its full board meeting on November 10, 2015, voted 29 in favor, 4 opposed and 0 abstaining to **approve with stipulations** the proposed zoning text amendment N160049 ZRY Zoning for Quality and Affordability. **The stipulations supported by CB1Q include:**

A. PARKING

1. Affordable housing and affordable senior housing developments should **require mandatory parking for no less than 20% of the affordable units** in addition to meeting regular parking requirements for the market rate units in the development. **Parking waivers should not be permitted for new developments.**

The proposed zoning text would make required parking optional for new buildings with affordable housing and affordable senior housing units when located within designated Transit Zones. Since Transit Zones use a half-mile catchment area around each station and bus route, the entire District, with the exception of the northeast section of CD1Q (Astoria Heights and Woodside neighborhoods), is covered by Transit Zones making a parking requirement optional for any new developments with affordable units. Although the N/Q elevated line, the R line below-ground and one F train station serve parts of the District, only the 21st Street/Queensbridge station in the southern part of the District is ADA accessible. Surface transit in the district is inefficient at best with circuitous bus routes and long headways between buses.

BOARD MEMBERS (cont.)

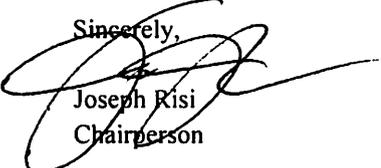
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Kevin Mullarkey
Stella Nicolaou
Gus Prentzas
Yawne Robinson
Rudolfo Sarchese
Nancy Silverman
Dominic Stiller
Danielle Tharrington
Marie Torniali

Eliminating a parking requirement for new development will significantly and negatively impact the quality of life for area residents who already deal with an extremely limited supply of on-street parking spaces in the District.

B. GENERAL INCENTIVES TO ENCOURAGE AFFORDABLE HOUSING IN NEW CONSTRUCTION

1. **In each new development exclude a percentage of affordable-unit floor area from countable floor area to provide an additional number of affordable housing units or to increase the size of those units in the new building. This would be in addition to the proposed reduction of the floor area factor that would increase maximum density per development.**
2. **Change or remove some of the zoning regulations that restrict provision of parking in districts where the Quality Housing Program applies, (i.e. curb cut prohibitions, location of on-site parking areas) to allow more flexibility to meet market demands for parking.**

Sincerely,



Joseph Risi
Chairperson

cc: Hon. Vicki Breen
Hon. Melinda Katz
Hon. Costa Constantinides
Hon. Aravella Simotas
Hon. Michael Giannaris
John Carusone, Chair, CB1Q Land Use and Zoning Committee
Elizabeth Erion, Assist. Chair, CB1Q Land Use and Zoning Committee



**City of New York
Community Board #1, Queens**

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Industrial/Commercial
Thomas Ryan
Parks & Recreation/Cultural Affairs
Richard Khuzami
Public Safety
Antonio Meloni
Street Festivals
Ann Bruno
Transportation
Robert Piazza
Youth
Jose Batista
Zoning & Variance
John Carusone

November 13, 2015

Hon. Carl Weisbrod, Chair
City Planning Commission
22 Reade Street
New York, New York 10007

RE: N160051 ZRY Mandatory Inclusionary Housing zoning text amendment

Dear Chair Weisbrod:

Community Board 1 Queens (CB1Q), after a duly advertised public hearing held during its full board meeting on November 10, 2015, voted 33 in favor, 0 opposed and 0 abstaining to **approve with stipulations** the proposed zoning text amendment N160051 ZRY for Mandatory Inclusionary Housing. **The stipulations supported by CB1Q include:**

A. GENERAL STIPULATIONS

1. **Infrastructure (sewers, utilities and mass transit) and social services must be upgraded in any rezoning area to accommodate the additional population and dwelling units.**
2. **Buildings with affordable units must distribute affordable units throughout the building and not cluster those units in less desirable sections of the structure.**
3. **All building amenities must be accessible to both market and affordable units.**

B. SETTING AFFORDABLE RENTS

The rental levels that are considered "affordable" do not correlate with the income levels of CD1Q residents. To bring affordable rents to a level more in line with area income:

1. **Index affordable housing rents to the Average Median Income (AMI) of the Community District where the project is developed rather than using a citywide AMI figure.**

BOARD MEMBERS (cont.)

Rose Anne Alafogiannis
George Alexiou
Gerald Caliendo
Joanna D'Elia
Dolores DeCrescenzo
Mary Demakos
Antonella Disaverio
Katie Ellman
Elizabeth Erion
Mackenzi Farquer
Dean O. Feratovic
Evie Hantzopoulos
Amy Hau
Pauline Jannelli
Vanessa Jones-Hall
Nancy Konipol
Jerry Kril
Melanie La Rocca
Vincent G. Marsanico
Frances Luhmann-McDonald
Prabir Mitra
Kevin Mullarkey
Stella Nicolaou
Gus Prentzas
Yawne Robinson
Rudolfo Sarchese
Nancy Silverman
Dominic Stiller
Danielle Tharrington
Marie Torniali

2. **Apply the phrase TERM OF THE TENANCY (instead of TERM OF THE LEASE) to any Affordable Housing unit agreement when referring to Preferential Rent.** This will eliminate future problems for seniors or the disabled who apply to freeze their rent through SCRIE/DRIE (Senior Citizen Rent Increase Exemption or Disabled Citizen Rent Increase Exemption). Since affordable senior housing will be subject to rent stabilization increases, a senior's rent could be frozen at a considerably higher "legal" rent if the above phrase is not substituted.

C. PAYMENT IN LIEU

Most of CDIQ is zoned for medium density development - buildings with 11 to 25 units - where the option to pay into a housing fund would apply instead of constructing actual affordable units. This approach does little to support the City's goal of preserving economically diverse neighborhoods when developments in newly rezoned areas can opt out of providing affordable housing. The option as presented instead encourages higher density market rate developments with affordable housing segregated into off-site locations.

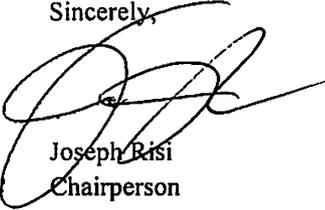
It is premature to offer this option for affordable housing since guidelines for its application and operation have not yet been defined. What are the criteria that determine whether a project can make such a payment in lieu of constructing the units? If a payment is made, who determines the site location of units that receive these payments? After a time, the amendment states that payments in lieu can ultimately be applied to housing outside the Community District where the payment was originally generated.

Recognizing that the City intends to provide this option for developers, **the following stipulations should be incorporated into any guidelines:**

1. **Payments in lieu of affordable units must be used to produce *new or additional* affordable housing units within the same Community District as the project that generates the payment.**
2. **Community Boards must be notified at the time of rezoning of intent by the developer to use the payment in lieu option.**
3. **Community Board must review the proposed locations for affordable units that are to be placed off site from the source project.**
4. **Reduce the ½ mile catchment area for sites that receive payments in lieu.** To foster economic diversity in newly rezoned areas, receiving sites must be in close proximity to the revenue-generating building.
5. **Once formulated, there must be Community Board review and comment on the rules and guidelines for payments in lieu.**
6. **There must be Community Board review and comment on any future changes to the rules and guidelines for payments in lieu.**

CBIQ expects that with fine-tuning the new Mandatory Inclusionary Housing text amendment can ultimately provide much needed affordable housing in our District. We look forward to working with your agency and with the Department of Housing Preservation and Development to ensure that the program is workable for both builders and residents, the economic diversity of our area is maintained and the needs of our residents.

Sincerely,



Joseph Risi
Chairperson

cc: Hon. Vicki Breen
Hon. Melinda Katz
Hon. Costa Constantinides
Hon. Aravella Simotas
Hon. Michael Giannaris
John Carusone, Chair, CB1Q Land Use and Zoning Committee
Elizabeth Erion, Assist. Chair, CB1Q Land Use and Zoning Committee

N 1600442KY
 Zoning for Quality @ Afford
 (ZQA)

COMMUNITY BOARD 1, QUEENS

Voting Roster
 Date 11/10/15

CPC _____
 BSA _____
 DCA _____

Community Board Member	Yes	No	Abs.	Community Board Member	Yes	No	Abs.
Rose Ann Alafogiannis	✓			Jerry Kril	✓		
George Alexiou	✓			Melanie La Rocca			
Daniel Aliberti	✓			Vincent G. Marsanico	✓		
Joan Asselin	✓			Frances Luhmann-McDonald	✓		
Edward Babor	✓			Antonio Meloni	✓		
Jose Batista				Prabir Mitra			
Ann Bruno	✓			Kevin Mullarkey			
Gerald Caliendo	✓			Stella Nicolaou	✓		
John Carusone				Norma Nieves-Bias	✓		
Jean Marie D'Alleva	✓			Mary O'Hara	✓		
Joanna D'Elia				Linda Perno	✓		
Dolores DeCrescenzo	✓			Robert Piazza			
Mary Demakos	✓			Rose Marie Poveromo			
Antonella Di Saverio		✓		Gus Prentzas			
Katie Ellman				Joseph Risi Jr.	✓		
Elizabeth Erion				Yawne Robinson			
Mackenzi Farquer	✓			Thomas Ryan	✓		
Dean Feratovic				Rudolfo Sarchese	✓		
Evie Hantzopoulos	✓			Nancy Silverman	✓		
Amy Hau	✓			George L. Stamatiades		✓	
Pauline Jannelli				Dominic Stiller		✓	
Vanessa Jones-Hall	✓			Danielle Tharrington			
John Katsanos	✓			Marie Torniali		✓	
Richard Khuzami	✓			Judy Trilivas			
Nancy Konipol	✓						
				Totals			

Number Of Board Present _____
 In Favor 29 Against ~~1~~ Abstain _____ Abstain For Cause _____

Comments _____



Melinda Katz
Queens Borough President

Community Board No. 2

43-22 50th Street, 2nd Floor
Woodside, New York 11377

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Patrick A. O'Brien
Chairman

Debra Markell Kleinert
District Manager

**RESOLUTION OF COMMUNITY BOARD NO. 2 IN THE BOROUGH OF QUEENS
REGARDING "ZONING FOR QUALITY AND AFFORDABILITY (ULURP Application No.
N160049ZRY) ("ZQA") and "MANDATORY INCLUSIONARY HOUSING (N160051ZRY) ("MIH")**

WHEREAS, in May 2014, Mayor de Blasio released a city-wide, ten-year plan to build and preserve 200,000 units of affordable housing throughout New York City known as Housing New York through the creation and implementation of a set of strategies to accomplish that goal; and

WHEREAS, after considerable effort and community outreach, the Department of City Planning ("DCP") and the Department of Housing Preservation and Development ("HPD") have identified several such strategies and amendments to the Zoning Resolution that they believe would effect changes that, among other things, encourage affordable, quality housing; and

WHEREAS, on September 21, 2015, DCP officially launched for public review two proposed changes to New York City's Zoning Resolution designed to promote more affordable housing in better quality buildings, and foster more inclusive and diverse neighborhoods, in furtherance of the goals of Housing New York, which proposals are known respectively as "ZONING FOR QUALITY AND AFFORDABILITY (ULURP Application No. N160049ZRY) ("ZQA") and "MANDATORY INCLUSIONARY HOUSING (N160051ZRY) ("MIH"); and

WHEREAS, Community Board No. 2 In The Borough Of Queens ("CB2") has thoroughly examined, reviewed, and considered each of the numerous aspects and provisions of both ZQA and MIH, both at meetings of its Land Use Committee and its full Board, and at a public community information meeting; and

WHEREAS, CB2 finds ZQA to be deficient in the following respects, among others, the exclusion of a mandatory parking requirement for the development of Senior Housing, the allowance of additional height (other than 5' at the ground floor), the permissible development of irregularly shaped lots, and the inclusion of hardship exceptions for development; and

WHEREAS, CB2 finds MIH to be deficient in the following respects, among others, the allowance of affordable units off site or in on-site but separate buildings, the allowance of a fund contribution for developments between 11-25 units with no corresponding details of how such monies would be used or administered within CB2, the distribution of affordable units on

every other floor (as opposed to evenly distributed throughout the entire building), no inclusion of lower AMI bands or AMI bands that are directly reflective of CBs actual AMIs, no inclusion of a preference for CB2 residents, and the inclusion of hardship exceptions for development; and

WHEREAS, CB2 recognizes the need for the provision of more and better affordable housing in New York City, and has been a strong and vocal advocate for same in the development of Hunters Point South and other areas within its district in the past, and will continue such advocacy in the future; and

WHEREAS, notwithstanding its strong and consistent record of advocacy for affordable housing, CB2 is constrained by the mandate of the City Charter to first consider the needs of its community district and its residents before considering city-wide or other broader initiatives, such as Housing New York; and

WHEREAS, CB2 has experienced a unprecedented growth in residential and other development, and population growth, in the immediate past, and will experience exponentially more such development in the immediate future; and

WHEREAS, the aforementioned development, and population growth, has not been accompanied by the simultaneous construction, or commitment to construct, infrastructure improvements necessary to provide the current, or future, residents of CB2 with an adequate level of the basic services to which they are entitled, including, among other things, effective and sufficient transportation, schools, medical facilities, parks and open space, sewer and sanitation, and other essential services; and

WHEREAS, neither ZQA nor MIH, nor Housing New York, addresses any of the aforementioned existing and anticipated infrastructure deficiencies within CB2 in any manner;

NOW, THEREFORE, IT IS HEREBY:

RESOLVED that Community Board No. 2 votes to oppose ZONING FOR QUALITY AND AFFORDABILITY (ULURP Application No. N160049ZRY), unless each of the above deficiencies can be fully addressed to its complete satisfaction; and

RESOLVED that Community Board No. 2 votes to oppose MANDATORY INCLUSIONARY HOUSING (N160051ZRY), unless each of the above deficiencies can be fully addressed to its complete satisfaction.

[This RESOLUTION was duly adopted, upon a motion made and seconded, at the regularly held monthly meeting of CB2 held on November 5, 2015, at which a quorum was present. The vote on the motion to oppose ZQA was 28 in favor of the motion, 2 opposed to the motion, and 3 abstaining. The vote on the motion to oppose MIH was 28 in favor of the motion, 1 opposed to the motion, and 4 abstaining]



COMMUNITY BOARD # 4Q

Serving: Corona, Corona Heights, Elmhurst, and Newtown

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Corona, New York

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Melinda Katz
Borough President

Louis Walker
Chairperson

Melva Miller
Deputy Borough President

Christian Cassagnol
District Manager

December 7, 2015

OFFICE OF THE
CHAIRPERSON

Hon. Carl Weisbrod, Commissioner
Department of City Planning
120 Broadway, 31st Floor
New York, NY 10271

DEC 9 - 2015

29006

RE: HOUSING NEW YORK

*Zoning for Quality and Affordability (Z.Q.A.)
(Mandatory Inclusionary Housing (M.I.H.))*

Dear Commissioner Weisbrod:

After a presentation by the Queens Department of City Planning on October 22, 2015, Community Board 4's ULURP/Zoning Committee reviewed the above-mentioned applications. Because a quorum was not present, a vote could not be taken. However, the committee members brought up the following concerns:

Affordability—What does it mean?

The bulk of the housing units will be market rate with a minority of those units affordable. It's not enough.

On the ZQA text amendment, parking was a major concern. Parking in our neighborhoods is difficult enough without adding more vehicles taking up spaces that do not exist.

The \$50,000 for off street parking per parking space was questioned. To sacrifice parking is problematic because many seniors still drive.

On November 10, 2015, a presentation was given to the full Board. Following the presentation, after a careful review and discussion, the Board voted to deny both proposals.

- For the MIH proposal the vote was: 17 to deny, 3 to approve, with 8 abstentions.
- For the ZQA proposal the vote was 22 to deny, 3 to approve, with 3 abstentions.

Some of the reasons for the denial were:

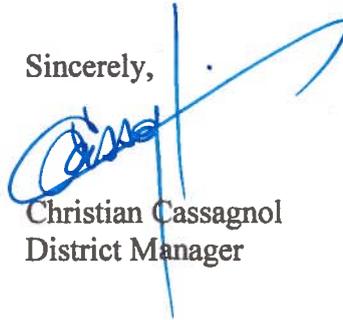
- The lack of parking for any new affordable housing
- Undoing various rezoned areas

- Developers can choose to pay a fee that would fund affordable housing elsewhere
- Who would manage the fund and how the fund would be invested

The Board also noted recommendations could not be made because they did not have the expertise to do so. If the Board would accommodate a change in zoning, it needs to be an incentive. Otherwise, developers will build as of right.

Although the Board recognized the very real need for affordable housing, more research needs to be done to build affordable housing that benefits all.

Sincerely,



Christian Cassagnol
District Manager

Cc: Kathi Ko
Department of City Planning-Queens



Community Board No. 5

Borough of Queens
Ridgewood, Maspeth, Middle Village and Glendale
61-23 Myrtle Avenue • Glendale, NY 11385
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E-mail: qnscb5@nyc.rr.com



Vincent Arcuri, Jr.
Chairperson

Gary Giordano
District Manager

November 30, 2015

Hon. Carl Weisbrod, Chairperson
and Commissioners
N.Y. City Planning Commission
120 Broadway (31st Floor)
New York, N.Y. 10271

Re: CB5Q Opposition to Proposed Zoning for Quality and Affordability
Text Amendment (Applic. #: N 160049 ZRY)

Dear Chairperson Weisbrod & Commissioners,

At their monthly meeting of Wednesday, November 4, 2015, the members of Community Board 5, Queens voted to accept the recommendation of their Zoning and Land Use Review Committee, in opposition to The Proposed Zoning for Quality and Affordability Text Amendment, for the following reasons:

- The increased height allowances in R4, R5, R6, R6B and R3-2 Zoning Districts could negatively affect neighborhood character significantly, in specific parts of Community District 5, Queens.
- Significantly reducing parking requirements for senior housing would limit the mobility of many senior residents, who are closer to age 65, and likely be a deterrent to many seniors otherwise seriously considering moving into a senior housing facility.

Sincerely,

Gary Giordano
District Manager

CC: Hon. Melinda Katz, Borough President of Queens
Hon. Elizabeth Crowley, Hon. Antonio Reynoso, Hon. Karen Koslowitz & Hon. James Van Bramer- City
Council Representatives
John Young, Director-Queens Office, NYC Dept. of City Planning
Vincent Arcuri, Chairperson & Walter Sanchez, Land Use Comm. Chairperson – CB5Q

Steve Goldberg, Chair, Planning & Zoning Committee, said that the committee was not in favor of the Zoning for Quality and Affordability portion of the amendment.

A Board Vote to support the Committee's position passed 22 in favor, 2 opposed, 3 abstained. ()

The Planning & Zoning Committee voted to support the Mandatory Inclusionary Housing.

The Board voted in opposition to the Committee's vote, and the motion failed. Vote was 16 opposed, 8 in favor, 3 abstained.

Notification of
Community/Borough Board
Public Hearing

FILE COPY

CITY PLANNING COMMISSION
22 Reade Street, New York, NY 10007
FAX # (212) 720-3356

INSTRUCTIONS

1. Return this completed form to the Calendar Information Office, City Planning Commission, Room 2E, at the above address at least fourteen (14) days before the scheduled hearing date.
2. Send one copy to the applicant's representative at the address listed below at least (10) days before the scheduled hearing date.

APPLICATION # ULURP# N160049 ZRY and ULURP # N160051 ZRY

DOCKET DESCRIPTION

ULURP # N160049 ZRY - Application submitted by Dept. of City Planning, pursuant to Section 200 of the NYC Charter, for a citywide zoning text amendment to promote affordable housing, including mandatory inclusionary housing, contextual height and set back changes, modifications to senior and supportive housing regulations and parking requirements.

ULURP # N160051 ZRY - Application submitted by the Dept. of City Planning, pursuant to Section 200 of the NYC Charter, for a zoning text amendment to establish a requirement for affordable housing as part of new development over 10 units within a "Mandatory Inclusionary Housing area".

THE VOTE TAKEN FOR ULURP #N160049 ZRY TO APPROVE THE APPLICATION WAS AS FOLLOWS:

(2) APPROVED (35) DISAPPROVED (1) ABSTENTION/CONFLICT

THE VOTE TAKEN FOR ULURP #N160051 ZRY TO DENY THE APPLICATION WAS AS FOLLOWS:

(35) DENIED (1) APPROVED (1) ABSTENTION/CONFLICT (1) LEFT ROOM

APPLICANT _____

APPLICANT'S REPRESENTATIVE _____

COMMUNITY BOARD NO. 7
BOROUGH BOARD OF _____

BOROUGH Queens

DETAILS OF PUBLIC HEARING

DATE NOVEMBER 9, 2015 TIME 7 P.M.
LOCATION QUEENS PLAZA CARE CENTER
33-23 UNION STREET, 9th FLOOR, FLUSHING, NY

EUGENT T. KELTY
COMMUNITY/BOROUGH BOARD OFFICER
NOVEMBER 10, 2015
DATE

CHAIRPERSON
TITLE



Chairman, Alvin Warshaviak

The City of New York
Borough of Queens

Community Board 8

197-15 Hillside Avenue
Hollis, NY 11423-2126
Telephone: (718) 264-7895
Fax: (718) 264-7910
Qn08@cb.nyc.gov
www.nyc.gov/queenscb8



District Manager, Marie Adam-Ovide

November 25, 2015

Carl Weisbrod, Director
City Planning Commission
22 Reade Street, Room 4E
New York, NY 10007

**RE: Mandatory Inclusionary Housing Text Amendment
Zoning for Quality and Affordability Text Amendment**

Dear Director Weisbrod:

This is in response to the above referenced zoning text amendments that were sent to our Community Board for review.

Members of Community Board 8, Queens cited issues with the removal of the parking requirement under the Mandatory Inclusionary Housing Text Amendment. The affordable housing in the context used in the Mandatory Inclusionary Housing Text Amendment is not affordable to the majority of New Yorkers. In addition, the Board received letters of opposition from civic groups.

In light of the above, the Board voted unanimously against the Zoning for Quality and Affordability Text Amendment and overwhelmingly against the Mandatory Inclusionary Housing Text Amendment at our meeting held on November 12, 2015.

Sincerely,

A handwritten signature in blue ink that reads "Alvin Warshaviak" with a circled initial "mao" to the right.

Alvin Warshaviak
Chairman

AW/mao

City of New York



COMMUNITY BOARD NO.9

Queens Borough Hall
120-55 Queens Boulevard, Room 310-A
Kew Gardens, NY 11424

(718) 286-2686
Fax (718) 286-2685
Meeting Hotline (718) 286-2689
Email: communitybd9@nyc.rr.com
Website: www.nyc.gov/queenscb9

Raj Rampershad, Chairperson * Lisa Gomes, District Manager * Melinda Katz, Borough President

November 18, 2015

Mayor Bill de Blasio
City Hall
New York, NY 10007

Carl Weisbrod, Chairman
New York City Planning Commission
22 Reade St.
New York, NY 10007-1216

Dear Mayor de Blasio and Mr. Weisbrod,

Queens Community Board 9 commends the initiative to address the crisis in affordable housing. Accordingly, we have carefully reviewed the City's proposals to achieve this: "Zoning for Quality and Affordability" (ZQA) and "Mandatory Inclusionary Housing (MIH). Unfortunately, the ZQA and MIH proposals are so seriously flawed that we must strongly oppose and reject them. Our reasons are detailed in the enclosed resolution, which was unanimously passed at our regular monthly meeting on November 10, 2015.

We have taken these proposals very seriously -- and rejected them. They claim to increase affordable housing. Yet, after learning of the recent Stuyvesant Town/Peter Cooper Village deal between the City and the Blackstone Group, we wonder whose interests are really being advanced. This deal, awarding the Blackstone Private Equity firm \$571 million of tax payer and other funds, makes one wonder how serious this Administration is about providing affordable housing to ordinary New Yorkers. An opportunity to maintain and quickly create well-placed affordable housing seems to have been missed. Even Crain's Business magazine (October 26, 2015) calls it a raw deal for ordinary New Yorkers, who are paying \$571 million to Blackstone, a private equity giant whose assets total \$81 billion. Why waive the City's \$77 million in mortgage recording taxes? Why call the \$144 million coming through the Housing Development Corporation a "loan" to Blackstone when they need never repay it? And why give them 700,000 square feet of air rights valued modestly at \$350 million? One can be reasonably certain those air rights will not be used to provide affordable housing. More than half a billion dollars is awarded to Blackstone in exchange for keeping 44% (some 5000 units) of Stuyvesant Town housing "affordable" and then only for 20 years -- a brief moment in the life of the city. And are these units truly affordable even in the short run? Moreover, as Crain's so aptly puts it: "Those enduring long commutes to Manhattan because they cannot afford to live there might well wonder why their tax dollars should help, for example, a family of three earning \$128,000 to rent in the most expensive borough for \$3,200 a month when lots of others would happily pay more." Why couldn't the City have worked with local and non-profit groups to plan permanent affordable housing, instead of the ZQA and MIH proposals which we believe will primarily benefit developers?

If enacted, the ZQH and MIH proposals would undo careful re-zonings in our community and many others. They would increase density with no provision for addressing the many concomitant increases in infrastructure. They would invite developers to purchase vulnerable properties to erect profitable housing, in return for a "blank check" to rezone these properties. These concerns, and many others, are detailed in the enclosed resolution. We know our concerns are shared by many other communities in Queens and throughout New York City. We urge you to take these concerns very seriously.

Sincerely,



Raj Rampershad
Chairman

Z:\Committees\Land Use Committee\CB9 ZQA-MIH-Resolution11815.docx

"SUPPORT A DRUG FREE COMMUNITY BOARD NO. 9"
Woodhaven, Ozone Park, Richmond Hill, & Kew Gardens

Cc:

BP Melinda Katz
Comptroller Scott Stringer
Nick Gulotta Queens Borough Director CAU
CM Eric Ulrich
CM Elizabeth Crowley
CM Karen Koslowitz
CM Rory Lancman
CM Ruben Wills
CM Melissa Mark-Viverito
Assemblyman Michael Miller
Assemblyman Michael Simanowitz
Assemblyman Andrew Hevesi
Senator Joseph Addabbo, Jr.
Senator Leroy Comrie
Senator James Sanders, Jr.
Queens Community Boards
Woodhaven Residents Block Association
Richmond Hill Block Association
Kew Gardens Civic Association
Queens Civic Congress
Queens Chronicle
Leader Observer
Forum



The City of New York

Queens Community Board 11

Serving the Communities of Auburndale, Bayside, Douglaston, Hollis Hills
Little Neck and Oakland Gardens

Christine L. Haider Chairperson / **Susan Seinfeld** District Manager

October 9, 2015

Carl Weisbrod, Chair
City Planning Commission
Calendar Information Office
22 Reade St., Room 2E
New York, NY 10007

OFFICE OF THE
CHAIRPERSON

OCT 21 2015

2 8882

Re: Mandatory Inclusionary Housing
N160051ZRY

Dear Mr. Weisbrod:

On October 5, 2015, Community Board 11 held a public hearing to discuss the above referenced zoning text amendment. The board voted to oppose the amendment.

Board members were concerned that DCP would rezone areas for higher density to accommodate inclusionary housing in areas they fought to preserve for low density housing, preserving the character of their neighborhoods.

Sincerely,

Christine L. Haider



Community Board 12
The City of New York
Borough of Queens

Jamaica, Hollis, St. Albans, South Ozone Park, and Springfield Gardens

OFFICE OF THE
CHAIRPERSON

OCT 23 2015

28874

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Fax (718) 739-6997

Melinda Katz
BOROUGH PRESIDENT

Adrienne Adams
CHAIRPERSON

Melva Miller
DEPUTY BOROUGH PRESIDENT

Yvonne Reddick
DISTRICT MANAGER

October 18, 2015

Mr. Stephen Everett
New York City Planning
120-55 Queens Blvd
Kew Gardens, NY 11415

Dear Mr. Everett:

Thank you for presenting the Proposed Zoning for Quality and Affordability and Mandatory Inclusionary Housing to the Land Use Committee of Community Board 12. The Members of Community Board 12 emphatically support the Mayor's initiative to create more affordable housing; however we believe that the overall plan represented remains Manhattan-centric and would cause a disruption in the quality of life that currently exists in the great Borough of Queens.

The following bullet points outline concerns of the Queens Community Board 12 Land Use Committee:

- **Basic Residential Height:** The proposal provides minor increases in height and minimal design flexibility. It is still unclear how the mixing of affordable housing and market rate housing will be impacted by this proposal.
- **The Mixing of Affordable Housing and Senior Housing, which ranges from Nursing Homes to Senior Assisted Living:** There is ambiguity and vagueness regarding managing and/or enforcing the responsibilities of developers.
- **Definitions still need to be updated for "Long-Term Care Facilities" and "Assisted Living":** The idea of creating additional capacity by increasing the building height requirements makes sense if the developers are inclined to utilize and abide by it. The façade changes and the set back reductions may help improve the building capacity and impact first floor commercial space.
- **Parking:** As with most Community Boards in the Borough of Queens, the proposed parking reductions will cause a severe hardship in Community Board 12. Because much of Queens is a

transit desert, the reality is that most families depend on driving their own vehicles for purposes of work, shopping, and recreation. With regard to seniors and affordable housing tenants, mass transit systems (subway, buses, Access-A-Ride) are not sufficient alternatives to driving their own vehicles. The reduction of parking requirements to 10% for ANY building construction in our area is completely UNACCEPTABLE. There are development projects that have come before Community Board 12 in the past that were severely opposed solely based on requests for reduced parking. As a whole community, we are constantly forced to cram more into less space, and we CANNOT support the reduction of parking in any instance going forward.

In summation, the Community Board 12 Land Use Committee cannot support either amendment nor recommend a favorable vote for acceptance to the full Board. Although we understand the overall intention, we do not feel that these amendments provide enough clarity or emphasis regarding: how developers can co-mingle market with affordable and senior housing in Queens (which we know they will), and we certainly cannot support the notion of reduced parking without reducing our fundamental quality of life in any instance.

Sincerely Yours,

Adrienne Adams, Chairperson, Queens Community Board 12

Glenn Greenidge, Queens Community Board 12 Land Use and Economic Development Chairperson

Cc: Mayor Bill deBlasio
Queens Borough President Melinda Katz
Carl Weisbrod, Department of City Planning
Senator Leroy Comrie
Senator James Sanders
State Assembly Member Vivian Cook
Council Member Rory Lancman
Council Member I. Daneek Miller
Council Member Ruben Wills



Community Board 12

The City of New York

Borough of Queens

Jamaica, Hollis, St. Albans, South Ozone Park, and Springfield Gardens

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Melinda Katz
BOROUGH PRESIDENT

Adrienne Adams
CHAIRPERSON

Melva Miller
DEPUTY BOROUGH PRESIDENT

Yvonne Reddick
DISTRICT MANAGER

Date: November 23, 2015

Mr. Stephen Everett
New York City Planning
120-55 Queens Blvd
Kew Gardens, NY 11415

Dear Mr. Everett:

Queens Community Board 12 thanks you for presenting the Mandatory Inclusionary Housing (MIH) and Zoning for Quality and Affordability (ZQA) Text Amendments to our General Board .

As you know, the Members of Queens Community Board 12 wholeheartedly support the Mayor's initiative to create more affordable housing in the City of New York. As previously stated however, we believe that the proposed text amendments remain ambiguous on several fronts. Specific concerns include developer liberties over the course of many years, and certainly the elimination of necessary parking in our well documented "transit desert" is of paramount concern to us and our constituents.

Queens Community Board 12 unanimously agreed with the recommendation of our Land Use Committee to disapprove the Mandatory Inclusionary Housing (MIH) and Zoning for Quality and Affordability (ZQA) Text Amendments proposed by New York City Planning, by a show of 29 approvals, 0 oppositions, and 0 abstentions.

Sincerely Yours,

Adrienne Adams
Chairperson
Queens Community Board 12

Cc: Glenn Greenidge
Chairperson, Land Use Committee
Queens Community Board 12



COMMUNITY
BOARD #14

COMMUNITY BOARD #14
City of New York
Borough of Queens

DOLORES ORR
Chairperson

JONATHAN GASKA
District Manager

1931 Mott Avenue, Room 311
Far Rockaway, NY 11691
Tel.: (718) 471-7300
Fax: (718) 868-2657
cbrock14@nyc.rr.com

November 12, 2015

Mayor Bill DeBlasio
The City of New York
Office of the Mayor
New York, NY 10007

Dear Mayor DeBlasio:

Community Board 14 at its November 10, 2015 board meeting voted unanimously 32-0 to oppose the proposed Zoning Text Amendment N160049 / N160051 ZRY / Mandatory Inclusionary Housing / Zoning for Quality and Affordability Text Amendments.

Within the boundaries of Community Board 14, we have almost 6,000 nursing and adult home beds, 5,000 units of Public Housing, the highest Section 8 voucher client placement in the Borough of Queens, over two dozen group homes, the St. Johns Boys Home, the recently opened homeless shelter, more than a handful of alcohol and drug rehabilitation centers, the highest unemployment rate in the Borough of Queens and according to the Department of City Planning over 28% of our population receives some type of Public Assistance. The largest employer in the district, Peninsula Hospital closed three years ago leaving no job prospects for any new resident.

Community Board 14 has done more than its fair share to help those in need. The burden of these unfortunate statistics has strangled our community economically, and is partially to blame for the closure of Peninsula Hospital. We continue to be poorly served by mass transportation and our limited roads and infrastructure cannot handle the already large increase in population that has occurred over the last decade. In 2008 in an effort to preserve quality of life and stop overcrowding in our district, we worked diligently with the Queens Borough office of the Department of City Planning to contextually down zone our community.

This proposed amendment allows for more Dense and Higher residential units to be built, reducing, or eliminating parking requirements and potentially further burdening our community economically and straining our already fragile and limited health care facilities. It also allows for more adult and nursing home and other health related beds to be built without a special permit.

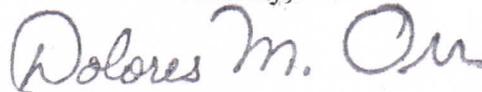


Our Land Use and Housing Committee made the following comments in their motion to the Board to object to the proposed text amendment:

1. The Board does not support any additional affordable housing units to be built or created in Community Board 14 that are not at 60% of AMI or greater and that the focus be on homeownership and that higher AMI's and Market rate housing are strongly preferred.
2. That special permits continue to be required for any proposed additional Adult, Nursing, Federal or State sponsored or licensed facilities / housing projects, as well as any other type of skilled or semi health care beds.
3. That NO reduction in parking requirements be allowed in any zoning district, under any circumstances including new senior housing units.
4. That height limits not be increased or any Zoning restriction be reduced nor waived for ANY type of housing or in any Zone without following ULURP process for each individual building and or project.

We thank you in advance for supporting our position on this important matter.

Sincerely,



Dolores Orr
Chairperson

JG/dls

Cc:
Hon. Melinda Katz
Hon. Donovan Richards
Hon Eric Ulrich
Carl Weisbrod, Chairperson CPC

City of New York

1 Edgewater Plaza, Suite 217 • Staten Island, New York 10305

Tel: 718-981-6900

Fax: 718-720-1342

Community Board No. 1

December 9, 2015

Mr. Carl Weisbrod, Director
City Planning Commission
22 Reade Street
New York, New York 10007

Dear Mr. Weisbrod:

On December 8, 2015 Community Board #1, Staten Island voted 28-1-0 to oppose Application No. N160051ZRY "Mandatory Inclusionary Housing" as follows:

Resolution on the Department of City Planning's Application No. N160051ZRY "Mandatory Inclusionary Housing"

Whereas, Department of City Planning presentation was given at a Community Board #1 Land Use Public Hearing on December 1, 2015, and;

Whereas, this is a voluminous proposal that warranted numerous public review sessions to properly vet, and;

Whereas, there is a lack of infrastructure on Staten Island especially on the north shore, and;

Whereas, Staten Island is transit poor, and;

Whereas, there is a potential for overcrowding, and;

Whereas, there are currently insufficient school seats, and;

Whereas, there exists a voluntary inclusionary housing program and programs such as 421-A and Housing and Preservation & Development subsidies, and;

Whereas, the amendment appears to benefit developers more than the population it proposed to help, and;

Whereas, the concept to finance affordable housing through zoning is problematic, and;

Whereas, an expenditure of \$8.2 Billion fulfilling MIH is substantial and could be used more efficiently,

Pg. 2 of 2
CB#1-MIH

BE IT HEREBY RESOLVED THAT: Community Board #1 opposes the Mandatory Inclusionary Housing zoning text amendment No. 160051 ZRY

If you need further information or have any questions, please do not hesitate to call or e-mail.

Sincerely,


Nicholas Siclari
Chairman


Vincent Accornero
Land Use Chairman

Cc: Hon. James Oddo
Hon. Debi Rose
Hon. Steve Matteo
Len Garcia-Duran

City of New York

1 Edgewater Plaza, Suite 217 • Staten Island, New York 10305

Tel: 718-981-6900

Fax: 718-720-1342

December 9, 2015

Mr. Carl Weisbrod, Director
City Planning Commission
22 Reade Street
New York, New York 10007

Dear Mr. Weisbrod:

On December 8, 2015 Community Board #1, Staten Island voted 27-2-00 to oppose Application No. N 160049ZAY "Zoning for Quality and Affordability Test Amendment" as follows:

Resolution on the Department of City Planning's Application No. N 160049ZAY, "Zoning for Quality and Affordability Text Amendment"

Whereas, Department of City Planning presentation was given at a Community Board #1 Land Use Public Hearing on December 1, 2015, and;

Whereas, this is a voluminous proposal that warranted numerous public review sessions to properly vet. and;

Whereas, Community Board #1 does acknowledge the advantages of the flexibility afforded by the increased height available and strengthened commercial environment, and;

Whereas, changes to as-of-right lower density affordable senior housing in lower density residential zones without community input and ULUP oversight is ill advised for Staten Island, and;

Whereas, Staten Island is a transit poor borough, and;

Whereas, the reduction or elimination of parking is not feasible for any potential development on Staten Island, and;

Whereas, the proposal allows units as small as 250 square feet to be constructed for senior citizens,

Pg. 2 of 2
CB#1-ZQA

Be it hereby resolved that: Community Board #1 is opposed to City Planning's Application No. N 160049ZRY zoning for quality and affordability

If you need further information or have any questions, please do not hesitate to call or e-mail.

Sincerely,


Nicholas Siclari
Chairman


Vincent Accornero
Land Use Chairman

Cc: Hon. James Oddo
Hon. Debi Rose
Hon. Steve Matteo
Len Garcia-Duran



DANA T. MAGEE
CHAIR

DEBRA A. DERRICO
DISTRICT MANAGER

THE CITY OF NEW YORK
Community Board 2
BOROUGH OF STATEN ISLAND

460 BRIELLE AVENUE
STATEN ISLAND, NEW YORK 10314
718-317-3235
FAX: 718-317-3251

December 10, 2015

Honorable Carl Weisbrod, Chair
City Planning Commission
120 Broadway, Floor 31
New York, New York 10007

Re: Zoning for Quality and Affordability
ULURP Number N160049ZRY

Dear Chair Weisbrod,

I am writing to inform you that at its December 9, 2015 monthly Full Board meeting, Community Board 2 unanimously resolved by a vote of **25 in favor of rejecting** the proposed Zoning for Quality and Affordability Text Amendment, ULURP Number N160049ZRY. There was no opposition to the rejection and no abstentions.

WHEREAS, the Zoning for Quality and Affordability Text Amendment one size fits all approach does not work for each community;

and, the ZQA's Text Amendment would increase project density, floor area, building height and unit count;

and the ZQA's Text Amendment would reduce light and air quality while overshadowing the lower scale buildings in our community;

and, the amendment would allow for developers to build out of character with our neighborhoods.

BE IT RESOLVED that, we, the members of Community Board 2 **reject** the Zoning for Quality and Affordability Text Amendment proposed by the Mayor and the New York City Department of City Planning.

Sincerely,

Dana T. Magee
Chair

Frank G. Marchiano
Chair, Land Use

Copy to: Honorable Bill de Blasio
Honorable James S. Oddo
Honorable Steven Matteo
Honorable Joseph Borelli
Len Garcia-Duran, Director of DCP/Staten Island
New York City Speaker Melissa Mark-Viverito

Application #: **N160049ZRY**

Project Name: **Zoning for Quality and Affordability**

CEQR Number: 15DCP104Y

Borough(s): **Staten Island**

Community District Number(s): **3**

Please use the above application number on all correspondence concerning this application

SUBMISSION INSTRUCTIONS

- Complete this form and return to the Department of City Planning by one of the following options:
 - EMAIL (recommended):** Send email to CalendarOffice@planning.nyc.gov and include the following subject line: (CB or BP) Recommendation + (6-digit application number), e.g., "CB Recommendation #C100000ZSQ"
 - MAIL:** Calendar Information Office, City Planning Commission, Room 2E, 22 Reade Street, New York, NY 10007
 - FAX:** (212) 720-3356 and note "Attention of the Calendar Office"
- Send one copy of the completed form with any attachments to the applicant's representative at the address listed below, one copy to the Borough President, and one copy to the Borough Board, when applicable.

Docket Description:

IN THE MATTER OF an application submitted by the Department of City Planning as part of the City's coordinated efforts under Housing New York - the Mayor's ten-year, five-borough housing plan - the Department of City Planning is proposing a set of targeted changes to zoning regulations to support the creation of new affordable housing and encourage residential buildings.

Applicant(s): NYC Department of City Planning		Applicant's Representative: Beth Lebowitz
Recommendation submitted by: Staten Island Community Board 3		
Date of public hearing: November 12, 2015		Location: 1243 Woodrow Road, 2nd Floor - Suite 8
Was a quorum present? YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>		<i>A public hearing requires a quorum of 20% of the appointed members of the board, but in no event fewer than seven such members.</i>
Date of Vote: November 24, 2015		Location: Woodrow Methodist Church Hall, 1075 Woodrow Road, SI
RECOMMENDATION <input type="checkbox"/> Approve <input type="checkbox"/> Approve With Modifications/Conditions <input checked="" type="checkbox"/> Disapprove <input type="checkbox"/> Disapprove With Modifications/Conditions <input type="checkbox"/> See Attached Resolution		
Please attach any further explanation of the recommendation on additional sheets, as necessary.		
Voting		
# In Favor: 42 # Against: 0 # Abstaining: 0		Total members appointed to the board: 50
Name of CB/BB officer completing this form Frank Morano	Title Chairman	Date



BOROUGH OF STATEN ISLAND
COMMUNITY BOARD 3

1243 Woodrow Road, 2nd Floor – Suite 8
Staten Island, New York 10309

Telephone: (718) 356-7900

Email: sicb3@cb.nyc.gov

Website: www.nyc.gov/sicb3

Resolution on the Department of City Planning's Application No.N160049ZRY, Zoning for Quality and Affordability Text Amendment "ZQA."

WHEREAS, Community Board 3, Staten Island received the Zoning for Quality and Affordability Text Amendment "ZQA" Department of City Planning "DCP" Application No. N160049ZRY on October 1, 2015;

WHEREAS, on October 14, 2015 the Community Board 3 Land Use Committee held a public hearing and representatives from DCP presented the Zoning for Quality and Affordability Text Amendment Application at that hearing;

WHEREAS, November 5, 2015 Community Board 3 convened a special meeting to review the Zoning for Quality and Affordability Text Amendment;

WHEREAS, Community Board 3 Staten Island is uniquely knowledgeable, possesses firsthand experience with the individual composition of our neighborhoods, and is in the best position to determine the impact of zoning text changes;

WHEREAS, Community Board 3 Staten Island supports and defends The Special South Richmond Development District "SRD" that was established in 1975 to control the development of the south shore of Staten Island to ensure that public infrastructure is tantamount to development, and to avoid obliteration of natural resources that define the community;

WHEREAS, Community Board 3 Staten Island absolutely supports the objective of the Staten Island Growth Management Task Force and their mission to examine and protect against density, and influence planned proposals that enhance Staten Island's quality of life;

WHEREAS, Community Board 3 Staten Island supported and approved Prince's Bay/Pleasant Plains/Richmond Valley DCP approved (2006) down-zoning text amendment that safeguards neighborhoods from overdevelopment and upholds character by mapping low-density districts;

WHEREAS, Community Board 3 Staten Island supported and approved Andrew J. Lanza's, the Civic Association of the Sandy Ground Area's, and the Pleasant Plans/Prince's Bay/Richmond Valley Civic Association's DCP approved application (2010) to down-zone a section of Rossville to preserve the established low-density character and ensure that future residential development will reinforce the existing patterns of semi-detached and detached homes;

WHEREAS, the ZQA was not a product of community based planning and nullifies many of the advances in Community Board 3 Staten Island and does not take into account the neighborhood character safeguards provided by the Special South Richmond Development District "SRD" and the Staten Island Growth Management Task Force;

WHEREAS, the ZQA is objectionable because its approach to planning by attempting to finance affordable housing through zoning is not suitable for a wide range of situations or individual borough centered problems;

WHEREAS, the ZQA allows developers to construct apartments as small as 250 square feet for senior citizens;

WHEREAS, the ZQA increases the density, floor area, height and dwelling unit count of affordable senior housing across the City, which will significantly diminish air, light, open space and living space;

WHEREAS, Community Board 3 Staten Island is opposed to any text amendment that increases the allowable density in existing zoning districts, as well as revising district boundaries inside existing zoning districts that allow for as of right increased density;

WHEREAS, the ZQA reduces or entirely eliminates the required parking for new developments ignoring the different and critical transportation needs of neighborhoods and the ability or willingness of government to provide sufficient and efficient public transportation to meet the needs of residents — present and prospective;

WHEREAS, the ZQA is an unprecedented action, allows an otherwise impermissible use, which increases dwelling unit count and building height, by permitting multiple dwelling unit buildings called Continuing Care Retirement Community "CCRC" to be located in single family R1 and R2 Districts without any necessity for affordable units:

WHEREAS, the ZQA while claiming that the new CCRC use is not as-of-right, allows these multiple dwelling unit buildings in R1 and R2 Districts by only a City Planning Commission authorization, thereby avoiding ULURP, the Community Board and City Council review;

WHEREAS, the ZQA's EAS dated September 18, 2015 was not written and reviewed by an independent third party, but rather by the Department of City Planning which has a vested interest in its approval, thereby creating the appearance of a conflict of interest, if not a conflict;

WHEREAS, the EAS concludes that there are no issues in need of mitigation disregarding the real infrastructure needs of the affected communities and the environments effects of the resulting new development on the public health, safety, and welfare of our citizenry.

WHEREAS, many of the proposed zoning changes will increase pressure on acquisition and demolition of underdeveloped property for purposed of redevelopment resulting in changing the character of our neighborhoods;

WHEREAS, the ZQA is not a good fit for the Community Board 3 Staten Island residents as the lack of transportation public alternatives (buses and trains) has compelled our citizens to be motor vehicle dependent community;

WHEREAS, Staten Island has one of the longest commuter times in the country, and our limited Express Bus Service is insufficient;

WHEREAS, Staten Island does not have a true mass transit system, the only train is the one-line Staten Island Railway, and we do not have subways like the other four boroughs;

WHEREAS, the south shore of Staten Island has a major deficiency in sanitary and storm sewers it does not make the south shore suitable for increased density;

WHEREAS, Staten Island is dependent on only two Sewer Treatment Plants which are currently overburdened;

WHEREAS, many of our schools are over-crowded, especially our high schools; and the fact that one was already forced into implementing a split session;

WHEREAS, our schools lack the resources to adequately offer children educational opportunities they need and deserve and increased density would further drain these resources;

WHEREAS, health care services within Community Board 3 Staten Island are limited (the only borough without a HHC hospital),with one private hospital the influx of the proposed inclusionary housing would be a burden;

WHEREAS, any mandated affordable housing proposal is subsidized housing whether it is funded by the government or the private sector;

WHEREAS, the ZQA does not decree that this affordable housing program is temporary assistance and encourage people to become independent as soon as possible;

WHEREAS, Community Board 3 Staten Island believes that the City's plan to spend over \$8.2 billion fulfilling MIH could be used more efficiently in other strategies rooted in community planning to create and preserve affordable housing;

WHEREAS, our Community Board would prefer to see our industrial zones developed in a manner that would contribute to creating jobs and to our economic development;

NOW, THERFORE,

BE IT RESOLVED THAT, Community Board 3 Staten Island is opposed to the Zoning for Quality and Affordability Text Amendment No.N160049ZRY in its entirety.

D. Public Agencies

DEC 23 2015

29244

Maria Torres-Springer
President & CEO

Tel: 212.312.3500
Fax: 212.312.3913
mtorres-springer@edc.nyc

December 21, 2015

Chairman Carl Weisbrod
City of New York - City Planning Commission
120 Broadway – 31st Fl.
New York, NY 10271

Dear Chairman Weisbrod and Members of the City Planning Commission:

On behalf of the New York City Economic Development Corporation, I write in support of the proposed Zoning for Quality and Affordability Text Amendment (“ZQA”), and I specifically commend the portion of the proposal that would encourage quality ground-floor retail in medium and high-density contextual districts by allowing up to five feet of additional height for buildings that include taller ground floors. This proposal would help support the retail sector, which employs nearly 350,000 New Yorkers, provides 35.8 percent of the City’s sales tax revenue, and is essential to our economy.

In addition to its citywide importance, the retail sector is also key to local economies and neighborhood life. At NYCEDC, we work closely with communities to incorporate local input into our planning and development projects. Access to quality retail stores is often a top priority identified by local stakeholders, because neighborhood retail provides needed goods and services, and because local retailers are often local residents who employ members of the surrounding community.

Retail uses can also be an important component in the financing of community benefits in mixed use development projects, including affordable housing. A mixed-use building with healthy ground-floor retail can support the financing of a greater number of community-serving uses, including more affordable residential units and deeper levels of affordability. Projects with revenue-generating retail uses are able to support larger first mortgages than projects without, thereby reducing the need for public and subordinate debt by millions of dollars for each multifamily, affordable project.

In spite of these benefits, a healthy, sustainable retail mix is not always easy to deliver, and zoning restrictions can exacerbate this challenge. Tight height limits in contextual districts lead to compressed ground-floor retail spaces that are less attractive to prospective tenants. This in turn can lead to vacancy, damaging the financial status of individual buildings and the economic health of the surrounding neighborhood.

Chairman Weisbrod and Members of the City Planning Commission
December 21, 2015
Page 2

The City has made efforts to address this problem in several recent development projects. One example is the Seward Park Mixed Use Development (now known as "Essex Crossing"), a project on the largest swath of undeveloped City-owned land south of 96th Street. Before the City issued an RFP; there was an extensive public engagement process with both community members and retail brokers to discuss the amount and types of retail space to include. Floor to ceiling height was an important component of those discussions, and in response, the RFP NYCEDC issued contained specific language to ensure that ground-floor retail spaces be at least fifteen feet in height. Unfortunately, such an approach is not allowed as-of-right in contextual buildings and can only be accomplished through the adoption of specific zoning provisions.

Adoption of the ZQA proposal will be a critical step in ensuring that new developments along commercial corridors provide the quality retail space our city needs. Allowing just five feet of additional height for buildings that provide taller ground floors will support the creation of well-sized and marketable ground-floor retail. It is a simple fix to a long-standing issue, and NYCEDC fully supports the proposal.

Sincerely,



Maria Torres-Springer

E. Organizations

Testimony by Tiana Leonard, chair of the Affordable Housing Committee of the NYC League of Women Voters, at the Department of City Planning Hearing on the zoning text amendments “Mandatory Inclusionary Zoning” and “Zoning for Quality and Affordability” December 16, 2015.

My name is Tiana Leonard. I am chair of the Affordable Housing Committee of the NYC League of Women Voters.

You may only think of the League at election time. The League is active all year round. We are nonpartisan and do not take positions on candidates and parties. However we take strong positions on issues. The League is firmly committed to equal rights in education, employment and housing. Eliminating housing segregation by class and income to produce truly integrated neighborhoods is a necessary prerequisite for equality of opportunity in education and employment.

Mandatory inclusionary zoning is a small step forward in this regard. We support several important modifications. We recommend that the affordable apartments be provided on 80%, not 65% of the floors. These apartments must be created equal, with the same exposures, kitchens, floors, and other finishes as the market rate apartments. Amenities such as playgrounds, laundry rooms, pools and gyms should be available to all residents. Stigmatizing residents on the basis of their income works counter to the economic integration the zoning changes are trying to accomplish.

To promote true integration, affordable apartments in each development must be targeted to a continuous range of incomes, rather than one narrow slice of the affordable spectrum as could happen if the income band is defined by average AMI. We also recommend that the number of options for percentage of affordable units and income range be increased to cover residents living in a greater range of economic conditions.

Condominiums and cooperatives should not be exempt. Our perpetual housing emergency has produced a desperate need for affordable units. We cannot afford to allow any residential buildings erected in rezoned areas to escape from this requirement.

Residents of communities that undergo rezoning become vulnerable to multiple forms of landlord abuse. Given this easily foreseeable danger, the zoning text amendment must include Anti Harassment provisions. Landlords who seek to take advantage of the rezoning should not be rewarded for making their tenants lives miserable. They must be required to present the Certificates of No Harassment that have been so successful in reducing abuse in special districts undergoing rapid development.

The zoning text proposes that developers of small buildings can fulfill the affordable housing requirement by making payments into a Local Affordable Housing Fund. The league recommends that the contribution be determined using a formula based on the actual costs of construction in that Community District, that procedures for

accountability be included in the zoning text, and that the use of the fund be reviewable by elected community and borough officials.

We now turn to Zoning Quality and Affordability. This proposal aims to facilitate the building of supportive senior housing, a segment of the population that desperately needs more housing. The sector of 60 plus year old seniors has grown by 25% in the last 15 years and twenty percent live in poverty. Many more have incomes that are inadequate to cover high NYC rents but are still too high to qualify for public benefits.

In order to maximize the amount of senior housing that could be built on available public sites, the amendment proposes to make the provision of accessory parking spaces optional rather than required. Currently, there is no parking waiver available for this housing type.

Since a typical senior residence contains 60-80 units, the current zoning code produces large accessory parking lots even though a DCP study of transit rich neighborhoods found only 5 of every 100 senior housing residents owned cars. Even in areas farther from public transit, only 10% own cars. The Council of Senior Centers and Services of New York City (the umbrella organization now called LiveOn NYC) looked at 50 parking lots and found that only six sites were fully utilized. Google Earth imagery indicates that the parking lots next to federally subsidized senior housing stand mostly empty.

LiveOn NYC identified 39 parking lots that could be used for new senior housing development, ¾ of which were in transit rich neighborhoods. Collectively, the selected sites represent almost a million square feet of underutilized land area that could support an estimated **2,000** new affordable senior housing units.

Clearly existing parking lots are not serving their designated purpose. We strongly support zoning code changes designed to provide desperately needed housing instead of underutilized parking spaces.

We applaud Mayor De Blasio, Deputy Mayor Glen, and Commissioners Weisbrod and Been for their efforts to construct and preserve affordable housing. We hope that these suggestions will help turn a good plan into a great one.

Thank you.



AIA
New York

December 16, 2015

Carl Weisbrod, Chair
City Planning Commission
22 Reade Street
New York, NY 10007

Dear Chair Weisbrod,

The American Institute of Architects New York Chapter represents over 5,000 architects and design professionals, and is committed to positively impacting the physical and social qualities of our city, while promoting policies beneficial to the welfare of our members. We have reviewed the Department of City Planning's Zoning for Quality and Affordability (ZQA) proposal and believe these revisions will help facilitate the construction of affordable and senior oriented housing, offer architects more flexibility to create better buildings more responsive to local contexts, spark the development of many surface parking lots and empty lots with irregular dimensions, and decouple the creation of housing from parking requirements, thereby encouraging the use of mass transit and enabling a more sustainable city. The proposed zoning text amendments can improve the city's built environment and streetscapes for many New Yorkers, advance projects that support a livable city, and increase economic activity within the architecture, engineering, and construction markets, bolstering the creation of jobs.

With the modest height adjustments, removal of rear yard setback requirements, the addition of more flexible outer court and street wall location rules, and the availability of greater lot coverage on corner lots, the proposal promotes the following beneficial outcomes:

- **More retail spaces in commercial districts.** A higher ceiling, at the ground floor allows for retail at the base without giving up rental units in buildings with sufficient floor area;
- **Better residential spaces with adequate ceiling heights.** An increase in building height allows for additional ceiling heights, encouraging more light and air in residential units;
- **Increased security and privacy for residents.** Raising the floor above the sidewalk for ground floor dwelling units separates them from the street;
- **Affordable housing in districts that receive inclusionary housing bonuses.** Sites that receive a floor area bonus can now build that area within a modestly increased zoning envelope. Flexibility in building envelopes will make it easier to utilize inclusionary housing, and flexibility at the base of buildings promotes better buildings, streetscapes, and communities;
- **Aging in place.** The senior population is increasing dramatically in NYC, and many seniors want to stay in their neighborhoods. By encouraging more dedicated senior buildings in low- and high-density districts, ZQA takes a progressive step forward to create a city that allows for aging with dignity. Further, the additional height opposite major infrastructure will enhance the quality of the housing;
- **Visual variety and resurgence of features common in traditional and historic apartment buildings.** The proposed text amendments allow for greater flexibility in design and construction without a radical increase in building height. For example, front courts not only improve the street-scape but improve natural ventilation. Neighborhoods throughout the city exemplify architectural diversity, which ZQA continues to encourage;
- **Reduction in unnecessary parking requirements to reduce housing costs and create more dwelling units.** Parking lots, especially at senior buildings, are largely underutilized and could instead provide additional apartments, community spaces, or outdoor amenities. If the City's public transportation expands as proposed, greater housing density could be realized without the traditional corresponding increase in parking provisions;

The American Institute of Architects

AIA New York
536 LaGuardia Place
New York, NY 10012

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www.aiany.org



- **Relaxed density caps and minimum apartment size.** The flexibility provided by the proposal will allow for the creation of more compact unit housing, as well as a variety of housing types, to accommodate the City's changing demographics;
- **Better site planning and architectural design.** The lowering of the minimum distance between buildings will substantially increase the site planning possibilities, including when there are multiple buildings on the same site. In addition, the change in courts will facilitate better apartment planning with greater possibilities through ventilation.

We believe these very positive outcomes justify the limited increase in building heights proposed in most districts.

As the review of the ZQA amendments continues, we hope you, the City Planning Commission, Community Boards, and individual Council Members will review the amendments to understand how they may impact individual districts and other City policies. Specifically, we believe more discourse should be given to the following:

The American Institute of Architects

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536 LaGuardia Place
New York, NY 10012

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www.aiany.org

- **Public education**
- **Street wall height increases in contextual zoning districts**
- **Budgeting for infrastructure**
- **Sustainability**
- **Current mapping of residential and mixed use districts**

Over the last eight months, we have participated in lively discussions about ZQA and its implications for NYC's neighborhoods. In addition, AIANY has taken a lead in educating the design community and the public on how the changes will lead to better buildings and communities. We have hosted public programs with DCP at the Center for Architecture to inform the design community about the upcoming changes; organized a charrette-style working session to analyze and illustrate the ways the amendments will alter the way we design buildings; solicited input from architects in all five boroughs; compiled case studies to show how the zoning changes will improve senior housing development, create more dynamic building envelopes, and improve streetscapes; met with Council Members representing a diverse range of districts to discuss the benefits of ZQA and how their neighborhoods will be affected; and spread the word through publications, articles in our e-newsletter, and mentions in social media outlets.

Zoning for Quality and Affordability facilitates improved housing design by allowing architects to achieve the floor area currently permitted but now limited by height and other envelope restrictions. ZQA eliminates these artificial barriers and increases flexibility to achieve the permitted zoning capacity while encouraging better and more contextual designs. We support the advancement of these amendments through the review process.

Sincerely,

Tomas Rossant, AIA
President, AIANY



AIA
Brooklyn



AIA
Queens



AIA
Staten Island

TESTIMONY SUBMITTED BY
AMERICAN INSTITUTE OF ARCHITECTS
BROOKLYN CHAPTER
QUEENS CHAPTER
STATEN ISLAND CHAPTER

RE: ZONING FOR QUALITY AND AFFORDABILITY
DRAFT ENVIRONMENTAL STATEMENT

CEQR No.: 15DCP104Y

The Brooklyn, Queens and Staten Island Chapters of the American Institute of Architects representing over 1000 members have studied and discussed this complex zoning amendment since it was proposed last spring by the Department of City Planning. We are very aware of the lack of affordable housing in New York City. Many of our own families and clients live this reality; and we also understand that the very poorest citizens pay 50-60% of their incomes for housing.

We are supportive of the various changes that seek to encourage design flexibility and streetscape improvements to new buildings and text that allows for increased ground floor height. Similarly the changes to ease development of irregular lots and shallow lots are mainly a positive modification. We also support the changes to definitions of senior housing, assisted living and long term care that better reflect the lives of the elderly today. We also feel that a reduction in minimum unit size for affordable senior housing is beneficial toward increasing the number of dwelling units.

However, we have serious concerns about aspects of the proposed zoning amendment that we find weak or inadequate in terms of the goals of quality and affordability.

SENIOR AFFORDABLE HOUSING

The thrust of the amendment was to create more affordable housing for seniors. The mechanism to accomplish this was to increase height and density (FAR) in many zoning districts throughout the city. However developers need only provide 20% of the floor area for senior affordable housing in order to take advantage of the height and extra floor area. We believe that a higher ratio (50%) of senior affordable housing is necessary to provide the housing that the Draft Environmental Impact Statement (DEIS) documents show to be necessary.

INCREASES IN DENSITY

Because the DEIS is only required to measure the incremental environmental impacts of the proposed zoning amendment, it does not need to mitigate any impacts that exist as a result of the significant development of many neighborhoods which were rezoned or up-zoned over the past 15 years. City services and needed infrastructure have not kept pace with development and population growth. The buildings we design and renovate in New York City do not exist in a vacuum - they provide living spaces, commercial and institutional structures for the citizens. These citizens need quality mass transit, safe, well-maintained, adequate street and highway capacity for drivers, bicyclists and pedestrians. Parents need sufficient school seats, at all levels for their children. We cannot rely on developers to build the needed capacity for the Department of Education; nor can we rely on promises of new school construction in order to build larger projects. Citizens also need ample open space and recreational facilities, nearby. Brooklyn is still woefully short of parks (in spite of Brooklyn Bridge Park). And of course, the garbage always has to be collected and the water and sewer infrastructure has to be maintained. Simply put – when there are more people, more services are needed. We believe that today the City is playing catch-up in terms of providing the services needed and is now fiscally sound enough to devote resources to supporting the development we see all around us. Any new zoning that increases density must be accompanied by an appropriate amount of investment and increase of services.

REAR YARD AND OPEN SPACE

We feel that the decrease in open space requirements in rear yards, lot coverage and shallow lots, while attractive to some owners and developers, will have negative impacts for light and air in residential construction. Contextual zoning districts that are adjacent to higher density districts will be especially vulnerable to the loss of light in rear yards (for example - R6B adjacent to the EC-1 on Fourth Avenue). A further added concern is that there is no way to predict or control the amount of development in a particular neighborhood or even on a street. In the case of senior affordable housing, open space is an important amenity for older residents. City Planning has suggested that a first floor roof could become common outdoor space but this is not mandated in the text.

AFFORDABILITY

To be more equitable, any zoning changes must ensure that the neediest citizens are not overlooked. While providing more affordable housing at all levels is necessary, safe affordable housing for the most fragile has far reaching benefits for the individual families and society in general. Half of all renters in NYC pay more than 30% of income for rent and half of those pay 54% or more for rent). We advocate that affordable senior housing be preferentially targeted toward the most burdened seniors.

PRESERVATION AND REGULATION OF SENIOR AFFORDABLE HOUSING

Affordable housing in New York City is a jumble of different programs regulated by different agencies. We are very concerned that senior housing units may not be preserved after the initial tenancy. The Department of City Planning is not a regulatory agency, but there needs to be accountability in order to preserve all affordable housing, senior or otherwise. NYS Attorney General Schneiderman's recent investigation of the 421-a affordable units provided by developers in exchange for tax reductions, revealed an alarming amount of non-compliance that have generated only modest fines.

LONG TERM CARE FACILITIES

The proposed 'long term care' definition would render blurred "uses" if enacted in R1 through R4 and R5A districts, which are meant for one and two family homes. The unintended result would create Multiple Dwelling use and high density throughout every residential zoning district in the entire city. The confusion of what is a health facility: nursing home, assisted living, hospital, clinics and community facilities with sleeping, only exacerbates the procedure for any DOB application. Long term care facilities, by definition, contain dwelling units and nursing beds. They are businesses and have an employment presence in neighborhoods. Low density neighborhoods with sparse public transit will be negatively impacted by this type of development.

FRESH FOOD STORES

The provision for fifteen foot high first floors as an inducement for "Fresh Food Stores" seems reasonable. However we have concerns about the enforcement of such a restriction once the initial fresh food store is no longer a tenant. Landlords may be tempted by tenants willing to pay higher rents than grocery stores. Obviously the increased height cannot be "given back" if there is no fresh food store operating. This goal, however laudable, does not belong in the Zoning Resolution. It might to make more sense to provide a tax reduction to the landlord who rents to a fresh food store.

PARKING REQUIREMENTS

Seniors have fewer cars and do less driving than the general population. However there needs to be further study to determine parking needs for senior housing and associated facilities. For example, do they require more visitors – medical care, social service and family visits? Long term care facilities have staff who commute to their jobs.

Anyone who drives or uses public transportation in the Brooklyn transit zone or Long Island City is aware of the serious congestion that has come with development. City Planning or City DOT has not addressed this in any meaningful way. It seems premature to reduce the parking requirements in the absence of data that supports it.

TRANSPARENCY

The amendment also reduces the amount of first floor transparency required from 70% where required to 50%. We are not opposed to the reduction, per se, but have a larger question about the effectiveness of first floor transparency requirements. Architects and city planners have long known that storefront activity contributes greatly to urban street life. The interesting store display, the inducement of merchandise "on sale" in a window, the glimpse of tables in a restaurant, the barber shop are part of the mercantile scene of a city that makes walking its streets so enjoyable. The glass storefronts we see today are too often covered with banal vinyl that contributes very little to the street scape. Rather than tinkering with the amount of transparency, we would suggest that some thought be put into making the transparency an effective part of the streetscape.

PLANNING

After a decade of zoning changes, we think it is time to do some comprehensive planning for New York City that involves communities in meaningful ways. Many Zoning Districts designations no longer have meaning when height and density allowances as well as BSA spot rezoning's can change an R-7, for all intents and purposes, into an R-8 or higher. A fine grained look at how districts have evolved over the past twenty years is overdue. This should not be a top down process. There are many instances where community involvement resulted in a better solutions – for example at Melrose Commons in the Bronx, Hoyt Schermerhorn in Brooklyn and the many 197a plans developed by Community Boards, even though many were ultimately not adopted by City Planning.

CONCLUSION

We have briefly outlined the problems we have with the Zoning Amendment and hope to be able to support it with the changes we have presented.

Thank you for the opportunity to present this testimony.

Glen Cutrona, AIA, President-Elect, Brooklyn Chapter

Ida Galea AIA, President, Brooklyn Chapter

Jeffrey Geary AIA, President, Staten Island Chapter

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Chairman Weisbrod and Commissioners:

Good morning. My name is Richard Bass, a Senior Planning & Development Consultant with Akerman, LLP. I am a licensed professional planner, with almost 40 years of practice in Israel, HPD, Jersey City, Manhattan Borough President, Coral Gables and two major NYC law firms. I have been an adjunct professor for 24 years, teaching urban planning to grad students.

I believe ZQA is a significant first step in fixing the sometimes clunky contextual and quality housing bulk regulations. The proposed treatment for corner sites, streetwall location and match-up, shallow lots, etc., should permit better urban design that better fits the existing built context.

The relief for streetwall height and maximum height, to accommodate qualifying ground floor retail and affordable housing makes both market and design sense. The small increase in streetwall height without qualifying ground floor retail or affordable housing corrects a 30 year old building form.

The relief from required parking regulations for affordable and senior housing also makes sense, and permits a commonsense approach to the provision of off-street parking.

I have a couple of suggestions. I work with many architects who offered to have working lunches with City Planning staff to discuss follow up actions that would further fix the bulk regulations. My firm offers to host those lunch discussions.

akerman.com

The parking regulations should be examined city-wide. For example, it makes little sense to require parking north of 96th Street or 110th Street, in Manhattan when there is no parking requirement south of 96th Street or 110th Street. Or for there to be a parking requirement for the 125th Street corridor, where there are 4 subway lines, Metro North and 10+ buses.

As to Mandatory Inclusionary Housing, the City continues to grow in population, with predictions of 9 million reported population. Housing production for all economic levels has not met this projected demand. This scenario reminds me of Econ 101, where demand exceeds supply, which will create an even greater affordable housing crisis in the future. Because affordable housing production is predicated on the success and production of private housing, it is important for the City to further facilitate the development process, be it for processing of DOB applications or for City Planning/BSA applications.

There is a direct connection between ZQA and MIH; they are mutually reliant. Without ZQA, the MIH bulk requirements do not fit easily, or at all, within the existing contextual envelope. ZQA is an incentive for a better building form that encourages affordable housing in the Voluntary Inclusionary areas.

My last suggestion is for a comprehensive City data base that clearly and correctly identifies the regulations governing a property. It is complicated for the land use professional; it may be overwhelming for a property owner or lay person to understand if a site is in a regular zoning district, a voluntary inclusionary district, a mandatory inclusionary district, an IBZ, a historic district, etc.

Thank you.



New York City

AARP New York

**Testimony of
James Arnold, Executive Council
AARP New York**

NYC Planning Commission Public Hearing

Affordable Housing Proposals – MIH and ZQA

December 16, 2015

**National Museum of the American Indian
New York, New York**

Contact: Chris Widelo (212) 407-3737 | cwidelo@aarp.org

INTRODUCTION

Good Morning, Chairman Weisbrod and Commissioners of the City Planning Commission. My name is James Arnold and I am a member of AARP's all volunteer executive council in New York. AARP is a social mission organization with over 38 million members nationwide. On behalf of our 750,000 members age 50 and older in New York City and the volunteers that are joining me here today, I want to thank you for the opportunity to testify on the MIH and ZQA housing proposals.

MIH and ZQA

AARP New York supports Mayor de Blasio's affordable housing plan. As we see the growing need for affordable housing and the rapid growth in the population of older residents, this plan will help the City to keep pace in supporting the affordable housing needs across the 5 boroughs.

Many older New Yorkers are living on fixed incomes and having trouble paying their rent. A 2014 AARP survey of New York City voters aged 50+ shows that affordable housing is a major concern for 54% of respondents, far surpassing other community concerns. In communities of color, this number is even higher – 67% of Hispanic voters identify housing as a major concern.

Earlier this year, AARP commissioned another survey of NYC voters, this time expanding the survey pool to include the Gen X and Boomer generations. Again, affordability was cited as a top concern, with 62% of Boomers and Gen X respondents expressing anxiety over their ability to afford housing in the future. This continues to be a concern for communities of color, with over 70% of African-Americans and Hispanics citing worry over their ability to pay their rent or mortgage in the coming years. These concerns have a potentially devastating effect for the City's population and economic growth, as 61% of Gen X and Boomer voters said they are considering leaving New York State to retire somewhere else because of the lack of affordability.

As the City's population continues to age, these concerns are likely to grow, and we need to act now to ensure we have safe, quality and, affordable housing for older New Yorkers now and in the future. AARP New York believes that the reforms proposed through Zoning, Quality and Affordability (ZQA) and Mandatory Inclusionary Housing (MIH) are an important step in the creation of more permanent affordable housing. These measures will help to ensure that New Yorkers 50 and older, can age in their neighborhoods and communities, where they want to be. This is a benefit to all NYC residents, as it will help us to keep the invaluable economic, cultural, and community contributions of the older population right here in New York.

As this plan moves forth, AARP New York believes it is crucial that each community have a voice and be invited to be engaged participants in the community zoning process. This will provide valuable insight into the needs of each neighborhood and the residents who live there.

Conclusion

Chairman Weisbrod and members of the City Planning Commission, I thank you for the opportunity to speak today on this important proposal. It is our hope that ZQA and MIH are approved, as they are an important step to providing quality, affordable housing for the City's older residents.



American Planning Association
New York Metro Chapter

Making Great Communities Happen

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December 16, 2015

Mr. Carl Weisbrod, Chairman
Department of City Planning
120 Broadway 31st Floor
New York, NY 10271

**RE: Proposed Text Amendments
Zoning for Quality & Affordability and Mandatory Inclusionary Housing**

Dear Mr. Weisbrod:

The NY Metro Chapter of the American Planning Association is a professional, educational, and advocacy organization representing over 1,300 practicing planners and policy makers in New York City and its surrounding suburbs. We are part of a national association with a membership of 41,000 professionals and students who are engaged in programs and projects related to the physical, social and economic environment. In our role as a professional advocacy organization, we offer insights and recommendations on policy matters affecting issues such as housing, transportation and the environment.

We have thoroughly reviewed the proposed text amendments entitled “Zoning for Quality and Affordability” (ZQA) and “Mandatory Inclusionary Housing” (MIH) and, while supportive of the policy goals, we have a number of questions and concerns which follow. We have categorized our comments into specific topic areas:

1. Public Information

We are aware that NYCDCP has conducted outreach to about 50 community boards, but there is still a general misunderstanding of how this policy would affect different neighborhoods. We very much appreciate the individual community profiles that were uploaded onto the ZQA website that enables residents to visualize local impacts, but we would like to see clearer engagement with community groups on who would be impacted and how. The process has been fast-tracked and has had limited input from community boards, neighborhood groups and elected officials. This has put the very people these initiatives are intended to help at a disadvantage to properly understand their ramifications.

How many new units can each neighborhood realistically expect to see and what would be the impacts of increased heights on shadows and sky exposure? Many residents and community boards have fought hard to establish limits on height and density and would not wish to see their efforts negated.

To improve the community profiles on the website, we suggest the number of stories under “Existing Max Height” should be provided in parentheses, as it is for the “Proposed Max Height” to confirm that the number of permitted floors is not increasing, just the height limits. Also, the term “mandatory” is not used under the Inclusionary Housing component, so it is not clear what is required and what is voluntary.

There is some confusion as to what would be allowed by the ZQA proposal as distinguished from the related, yet separate, MIH requirements. For example, the maps show the impact of the height increases allowable under ZQA that would never be achieved on corridors that are also covered by the MIH proposal. Those areas that are subject to inclusionary housing requirements should be clearly hatched or shaded.

What is also confusing is that the information on height increases under MIH show the heights allowed under ZQA as the baseline, so the cumulative impacts are hard to define and subject to misinterpretation. A column should be added to indicate the allowable heights under current regulations.

2. Impacts in all Boroughs

The Mayor has emphasized that he has a five-borough plan, but we ask what will be done to encourage development in areas outside of Manhattan where there is great housing need but relatively less attention. The height and density bonuses may be appropriate for Manhattan’s core, but could be a problem for smaller-scale neighborhoods in the other boroughs and even in other parts of Manhattan.

The cumulative height increases of the ZQA and MIH proposals could result in a greater change to community character in areas that do not already have 20+ story/160’ building heights. Under these guidelines, a building in the R7A zone, currently limited to 80’, could reach 105’ - over a 30% increase. These allowances seem to consider design quality only from the standpoint of an individual building, not in regards to a sense of place and identity, a basic premise of urban design. Throughout the city, these smaller-scale communities have taken on a special identity that should be considered more thoughtfully. The city is known for its diversity, not only in culture and ethnicity but also in its architecture and character of its communities.

Additionally, many softer market neighborhoods already see significant affordable housing production developed under current as-of-right regulations. The proposal as-is would simply reward developers additional FAR to build affordable housing that would be built anyway. This risks concentrating subsidies in particular neighborhoods. We need to be talking about diversifying and desegregating neighborhoods in order to achieve more equity, as opposed to creating incentives for more concentration.

3. Parking and Transportation

We question how the parking reductions of this policy will affect the current housing stock and development potential. As senior housing sites will no longer have to provide off-street parking, will the extra developable land be subject to mandatory Inclusionary Housing requirements due to the potential for increased density? Will additional affordable units be required or can the “extra” land be leased for market-rate housing?

The Zoning Resolution currently prohibits affordable housing developments from renting their surplus parking spaces to the surrounding community. Amending or eliminating this restriction would have dual benefits: increasing the availability of parking in a given neighborhood and providing additional revenue for building reserves.

The designation of transit zones is an issue of particular concern. The proposed definition of a half-mile from subway stations is too far to be considered a convenient walking distance. The topographic challenges in many neighborhoods, particularly those that feature step-streets, further exacerbate the difficulties of navigating access to rapid transit.

Has there been any coordination with the MTA regarding the capacity to accommodate transit-oriented development? Will any significant infrastructure improvements be necessary in certain neighborhoods to handle the potential increase in density?

4. Sustainable Development

The City has been a leader in incorporating sustainable practices into its zoning regulations. This has had the effects of reducing both construction costs for developers and utility bills for tenants of energy-efficient buildings. The City should continue this trend should incentivize sustainable practices by offering streamlined permitting, review prioritization and or reduced fees.

5. Senior Housing

An important objective of the proposals is to encourage affordable independent residences for seniors. This is needed in order to meet what demographic trends indicate will be an increasing demand. The increases in allowable height and FAR will enhance project feasibility in many cases. We are concerned, however, that the affordability requirements of MIH are only applicable for a limited time duration. We recommend that any additional units enabled by the height and FAR bonuses be required to remain affordable in perpetuity.

Chapter Position and Recommendations

With regard to *Zoning for Quality and Affordability*, the Chapter agrees with one of the basic underlying premises of the proposal: that current zoning regulations often result in outdated and non-contextual designs. Inflexible standards can sometimes impede the creation of affordable housing especially when encountering irregular blocks and parcels or unforeseen site conditions.

We agree that zoning laws must be periodically updated to reflect past experiences and to incorporate modern reflections on architectural design, community, livability, and the urban experience, while providing aesthetic flexibility. However, while well intentioned, we do have concerns that the proposal has a 'one size fits all' approach and does not adequately account for the diversity of neighborhoods and housing stock.

The regulations must be more transparent and easier to understand and implement if the City is to promote, rather than impede, quality design. Training of the Building Department staff and closer coordination between the departments of Building and Planning will be necessary to achieve the intended results.

With regard to *Mandatory Inclusionary Housing*, the Chapter supports the mandatory inclusion of affordable units in all areas of the City. The current lottery system is unduly competitive and has produced an inadequate number of units, but we are concerned that the current proposal fails to address over a third of the City's population with incomes at or below 40% of Area Median Income (AMI). We suggest certain specific recommendations to improve the proposal:

- Identify subsidies and incentives for units in the 100-120% AMI range, particularly for highly segregated neighborhoods outside of Manhattan.
- Require that all MIH options, regardless of average income level, set aside a band of 15% of units at the 30% AMI level.
- Increase the number of MIH options to serve the range of diverse neighborhood needs.
- Include options that provide a varied range of very low-incomes and moderate/middle-incomes in a single option.
- Require that off-site MIH developments set aside an additional 10% affordable units above the on-site requirement.

The Metro Chapter would like to thank the Department of City Planning for taking the time to provide us with a presentation of this proposal and thank you for the opportunity to comment.

Very Truly Yours,



James Rausse, AICP
Chapter President



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**TESTIMONY OF BENJAMIN DULCHIN, BEFORE
THE CITY PLANNING COMMISSION REGARDING THE PROPOSED
“ZONING FOR QUALITY AND AFFORDABILITY” TEXT AMENDMENT**

December 16, 2015

Good Morning. Thank you City Planning Commission for the opportunity to testify.

My name is Benjamin Dulchin and I am the Executive Director of the Association for Neighborhood and Housing Development (ANHD). ANHD is a membership organization of NYC- neighborhood based housing and economic development groups- CDCs, affordable housing developers, supportive housing providers, community organizers, and economic development service providers. Our mission is to ensure flourishing neighborhoods and decent, affordable housing for all New Yorkers. We have over 100 members throughout the five boroughs who have developed over 100,000 units of affordable housing in the past 25 years alone and directly operate over 30,000 units.

While we do have some suggestions for improvement, and we acknowledge that the proposed text does mean some real trade-offs for communities, we believe the Zoning for Quality and Affordability (ZQA) proposal is worthy of support. The ZQA proposal reflects thoughtful and modest changes to encourage affordable and senior developments, while preserving the types of livable, mixed-use communities New Yorkers value.

We all agree that we should plan for our future needs, and it is clear that housing will continue to be one of the City’s most pressing issues. We currently have a million senior citizens, who are disproportionately low-income. Just this November, the Citizen’s Budget Commission came out with a study which showed that almost a third of single seniors pay more than half their income in rent. This challenge is only poised to increase. The City is projected to add over 360,000 more senior citizens in just the next 15 years. Our low-income population is growing, but our supply of apartments with affordable rents continues to shrink. Going forward, we simply have to make it easier to build affordable and senior housing in New York so that we can address these future needs.

The Zoning for Quality and Affordability proposal takes some smart steps to address this need.

Contextual zoning districts – areas of the city which have strict height limits and design guidelines – were first developed in the 1980s. But the situation in the city has changed dramatically since then. Construction techniques are different. Affordable Housing programs are different. Car usage is different. And our city needs affordable and senior housing more desperately than ever, a need that is projected to continue well into the future. As such, we need to rethink the regulations in these districts in a thoughtful manner, to address the needs of today.

It’s important to be honest about the tradeoffs – these changes do mean height increases for new buildings in many areas. And since **contextual districts are almost always the result of community advocacy, we are concerned about the precedent it sets, and believe revisiting the regulations in these districts is something that should not be taken lightly.** ANHD deeply respects the community voices and feedback that have been expressed through the land use process and ZQA must be mindful of respecting these voices and agreements.

But we also believe that the modest height increases offered by ZQA in return for incentivizing affordable and senior housing are reasonably designed. **The new ZQA rules are specifically written to not encourage tear-downs of existing structures to make way for new developments, just to encourage better design and affordability options for new developments.**



Planning New York City is the art of balancing many concerns in a city with limited space. **With our affordable housing crisis continuing unabated, and our senior population projected to increase 36% by 2030, the ZQA proposal strikes the balance our city will need in the upcoming decades.**

Most importantly, this proposal fits with our belief that **zoning changes should, in all cases, specifically encourage affordable housing development or other community benefits.** Communities of all types from across the City, have made it clear that more luxury housing is not a community benefit – and we are heartened that the City has recognized this, and modified its original ZQA proposal to better encourage Inclusionary Housing, Affordable Housing, and Senior Housing instead of unrestricted market-rate housing.

There are certainly aspect of ZQA which could be strengthened. For instance, we believe all housing throughout an entire development under the new rules should be permanently affordable. With our Senior population looking to peak in 30 years, it makes no sense to allow affordable senior developments under the new rules whose regulatory agreements expires in 30 years, when the crisis will be at its peak.

Another aspect that should be considered is that ZQA must be more than a one-size-fits-all solution. Not all local neighborhoods parking needs, mass transit access, commercial space needs, current density and supportive housing providers are the same, and ZQA should take these types of differences into account. There are a variety of valid concerns that have been raised throughout this the land-use process and the Administration's final ZQA policy needs to factor in community feedback.

And it is also important to note that ZQA is only one piece of a larger puzzle in addressing our affordability crisis. The City must also put in place better support for community-based nonprofits developers, a much stronger Mandatory Inclusionary Housing proposal that creates deeper affordability units, and a citywide plan to prevent displacement and harassment.

More senior and affordable housing is something our city needs, our seniors and low-income families need, and **we are ultimately much better off addressing this issue now, before our affordable and senior housing crisis get worse.** The administration should be commended for its foresight and proactivity on this issue, and we support their effort.

Thank you again for the opportunity to testify.



TESTIMONY OF BARIKA X WILLIAMS, BEFORE THE CITY PLANNING COMMISSION REGARDING THE PROPOSED "MANDATORY INCLUSIONARY HOUSING" TEXT AMENDMENT

December 16, 2015

Good Morning. Thank you City Planning Commission for the opportunity to testify.

My name is Barika Williams and I am the Deputy Director for the Association for Neighborhood and Housing Development (ANHD). ANHD is a membership organization of NYC- neighborhood based housing and economic development groups- CDCs, affordable housing developers, supportive housing providers, community organizers, and economic development service providers. Our mission is to ensure flourishing neighborhoods and decent, affordable housing for all New Yorkers. We have over 100 members throughout the five boroughs who have developed over 100,000 units of affordable housing in the past 25 years alone and directly operate over 30,000 units.

The de Blasio Administration's current MIH proposal misses the opportunity to create the guaranteed, truly affordable housing that many neighborhoods are demanding. The MIH proposal does not reflect or adequately serve the diverse range of incomes, populations or local communities or ensure that we are building sustainable inclusionary communities for all New Yorkers. **Therefore, absent substantial changes that would guarantee truly affordable housing that neighborhoods and the city overall needs, ANHD cannot support the Mandatory Inclusionary Housing (MIH) proposal.**

Having a well-designed mandatory affordable housing requirement is critical progress for fighting NYC's affordability crisis. ANHD has been the leading organization calling for a Mandatory Inclusionary Housing policy because we believe that the City needs a new baseline for how affordable housing gets built in all communities. We believe this type of policy presents an opportunity to put in place a "new normal" where every neighborhood and site that is upzoned will include guaranteed affordable housing that is permanently affordable and truly meets the needs of the local community.

However this administration's MIH proposal misses a key opportunity to create a new and effective centerpiece housing program that aims to both help address the city's affordability crisis and to create inclusive communities. **The City's MIH proposal primarily targets the 60% Area Median Income (AMI) and above, these levels leave out nearly half on New Yorkers and are the levels already served by current housing programs.** Communities cannot be asked to accept the impact of major upzonings without being guaranteed the benefit of the truly affordable housing that meets the need.

ANHD has done extensive analysis of the City's previous voluntary Inclusionary Housing Program, voluntary R10 program, the City's own MIH Market and Financial Study, the City's MIH proposal, as well as the programmatic structure best practices, and lessons learned of inclusionary housing programs from across the nation. In addition, ANHD put-on a half-day Inclusionary Zoning policy convening that included local government officials and policy experts from Chicago, San Francisco, Oakland, and DC.

Based on our research and analysis, **ANHD is calling on the City to revise its Mandatory Inclusionary Housing proposal and add additional options with deeper affordability levels to meet the full range of incomes and neighborhoods across the City.**



- **Add a Deep Affordability option of 30% affordable housing at an average of 30% AMI.**
- **Require that all MIH options, regardless of average income level, set aside a band of 15% of units at the 30% AMI level.**
- **Eliminate the current 'Gentrification Option,' that sets aside 30% of units at 120% AMI.**
- **Increase the number of MIH options to 5, to serve the range of diverse neighborhood needs.**
- **Require that off-site MIH developments set aside an additional 10% affordable units above the on-site requirement.**

MIH can and should be a powerful affordable housing tool, and is one that ANHD and our groups have pushed for over a decade. But, the affordability levels set by the Administration's MIH proposal are too high to meet the needs of too many NYC residents and neighborhoods. The City's MIH proposal presents three options, with affordability level requirements ranging from 60% of Area Medium Income (AMI), or \$1,200 for a 2-bedroom, up to 120% of AMI, or \$2,500 for a 2-bedroom.

At these affordability levels, MIH misses the core of the housing crisis and even the core of NYC's population. **Nearly a third of New Yorkers fall below 40% AMI, and of the more than 1.1 million households that are rent burdened, 83% or 938,000 are below 60% AMI. In many communities, the income levels required in the City's MIH proposal would further gentrification, rather than help provide the affordable housing that local residents need.**

ANHD deeply respects the community voices and feedback that have been expressed through the land use process and MIH must be mindful of respecting these voices and take these concerns into account. MIH must be more than a one-size-fits-all solution. The City's current MIH proposal consists of only three options for affordable housing to serve the diversity of populations, incomes, and neighborhoods. There are a variety of valid concerns that have been raised throughout this the land-use process and the Administration's final MIH policy needs to take into account this community feedback.

MIH can and should be an important new piece in our City's affordable housing toolbox, but it is only one tool. MIH alone will not create, let alone preserve, all the affordable housing needed for any neighborhood in the City. This is why it is key to make clear that MIH is starting point for what neighborhoods can ask for from developments, and not a finish line. Community residents, housing groups, community boards, and local elected officials need to maintain the ability to ask for more affordable housing, using other housing policy tools outside of and in combination with MIH to meet the needs of local communities and the city as a whole.

In addition, the administration's MIH proposal and the Mayor's Housing plan does not does not have mechanisms in place to proactively prevent the displacement and harassment of tenants, or to proactively preserve communities' non-subsidized affordable units in the face of these rezonings. Building market-rate housing, even if there is some affordable housing as part of the deal (including future potential MIH units), is not a neutral act. We know from hard experience that bringing in more market-rate residents increases displacement pressure in existing private market low-rent housing throughout the neighborhood. The number of NYC apartments with monthly rents below \$1,000 fell by nearly 13 percent between 2011 and 2014. If rezonings ultimately lead to a net loss of affordable housing despite the construction of new affordable units, we will see the city's affordable housing crisis deepen further. **The City's increased housing production / rezoning strategy must be matched with an equally robust set of proactive and enforceable anti-displacement, anti-harassment, and preservation policies in order to ensure diverse and sustainable communities in our City.**

Specifically ANHD is calling for the MIH proposal to be revised as follows:

1. Add a Deep Affordability option of 30% affordable housing at 30% AMI.

One of the greatest concerns expressed by local residents, housing groups, and community boards is the level of affordability of potential affordable units. Communities are continually raising the question of whether units termed "affordable" will truly be affordable to local families or New York City residents more generally. **Yet, the City's MIH proposal fails to include any options targeting deep affordability.** More than 25% of New York City households make less than \$25,000 annually, or less than 30% AMI. Any MIH program in our City must include at least one option designed to serve this sizeable part of the City's population.

A recent ANHD white paper analyzing the City's own MIH Market and Financial Study found that there is significant room to require more and/or deeper affordability while maintaining financial feasibility. In some markets, a deeper affordability option is financially feasible without additional subsidy. Other markets would require additional subsidy, but in these areas the same is true for the options already proposed by the City. Furthermore, this option serves the policy goals of economically diversifying neighborhoods and providing a wider variety of housing opportunities for a wider variety of income levels.

2. Require that all MIH options set aside 15% of units at the 30% AMI level.

The options proposed by the City require that affordable units serve an average of 60%, 80% or 120% of AMI. As presented, developers could build for a range of income bands, or target all units to the same AMI level. In order to ensure that MIH developments serve a range of New Yorkers, and to further the goal of economic integration, the City should require that all MIH options set aside 15% of units at the 30% AMI level.

The City's own Market and Financial Study for MIH, which only studied 60%-90% AMI level scenarios, seemed to disregard how MIH might serve deeper affordability needs that make up the epicenter of our housing crisis. If we are to chip away at our housing crisis, it is critical that any MIH policy include a guaranteed commitment to provide housing for some of New York's highest need families by guaranteeing that 15% of any option be set aside for households at or below 30% AMI.

3. Eliminate the current 'Gentrification Option,' the 30% set aside at 120% AMI option.

One of the City's MIH options includes at 30% set aside at 120% AMI, for so-called 'Emerging Markets.' However, a 120% AMI option would give developers credit to "affordable housing" for households earning approximately \$103,000 a year, or paying approximately \$2,400 a month in rent for a 2-bedroom apartment. Let's be clear: that isn't affordable housing. Only the top 25 percent of city households can even afford 120% AMI rents. And less than 7% of households at these six figure levels are rent-burdened, in comparison to over 66% of households earning below \$100,000. This MIH option moves away from creating mixed income neighborhoods and away from serving those who need housing the most.

4. Increase the number of MIH options to 5, to address the range of diverse neighborhood needs.

The City's current MIH proposal consists of only three MIH affordable housing options that would apply to the all residential lots that will be upzoned in the future across the myriad of neighborhoods in New York City. To ensure that the citywide program includes options that are appropriate for our wide range of community needs, more options should be created.

The limited options provided leave communities with insufficient choices to apply to their local neighborhood context. Neighborhoods where the housing needs are at the lowest AMI levels are left without a viable option. Neighborhoods taking on sustainable 200%+ density increases and expecting that upzoning to be matched with an increased affordability are left without a viable option. **The current three**



MIH options fall short of providing options that serve the full range of city incomes, do not provide enough options that address local needs, and fail to leverage the most affordability from each upzoning.

5. Require that off-site MIH developments set aside an additional 10% affordable units.

The City's current MIH proposal has the same requirements for on-site as for off-site affordable housing. This is a mistake, and puts New York City out of step with every other city where MIH has been an effective policy. On-site affordability has a greater social value than off-site affordability, even when off-site is required in the same Community Board or within 1/2 mile, because it fosters the most income integration, and because of the likely placement of the off-site affordable building in a higher poverty area where land costs are lower.

For instance, in the recently proposed Brooklyn Heights Library development, the market-rate units are being built within a very short distance of several subway lines and zoned for P.S. 8, one of the City's most desirable public schools which received the highest "excellent" rating in four out of five categories on their latest quality review. The affordable component, while in the same Community Board, is two miles away, within walking distance of only one local subway line, and zoned for a public school which achieved solid but lower scores on its latest quality review. ANHD's white paper analyzing the City's Market and Financial Study for MIH found that in most cases under the current proposal, affordable housing will be built off-site. **ANHD's white paper and the City's own MIH Market and Financial Study confirm that the value in having an off-site option is its ability to generate more affordable units for the same cost.** Without requiring additional affordable units in order to build off-site, there is little value in having this option for the City, and it comes at a cost to the community.

Thank you again for the opportunity to testify.

OFFICE OF THE
CHAIRPERSON

OCT 27 2015

22881

Auburndale Improvement Association, Inc.
P.O. Box 580331, Station A
Flushing, NY 11358
October 19, 2015

Mayor deBlasio, via the Department of City Planning, announced in March of this year his new proposal to increase the number of affordable and senior housing units in our city. The proposal is called "Zoning for Quality and Affordability". It has stirred much controversy throughout the city in civic and preservation quarters.

Although the goal to increase affordable and senior housing units is admirable, the Mayor's 160 page proposal would decimate many of the accomplishments that community and civic people have achieved over the years through our contextual rezonings. Some of the disturbing features of the proposal include allowances for taller and bulkier buildings in certain zoning designations and the elimination or reduction of parking requirements for certain types of senior housing. There are many other objectionable features to the proposal, which seems to favor developers over the needs and desires of the communities. It seems that as the proposal is examined more closely, more disturbing components are uncovered.

What would be more logical and less damaging would be to require builders to set aside a larger percentage of units in new developments for senior and affordable housing. Although this type of unit is not as profitable as market rate and luxury housing, the impact on our communities would not be as severe as what the Mayor is currently proposing.

The Auburndale Improvement Association, Inc. sent out a petition to be signed in opposition to the Mayor's proposal to all of our nearly 600 members with our September, October 2015 newsletter. We have received back nearly 300 signatures against the Mayor's proposal. Enclosed, are copies of all of the petition signatures, along with the comments that many of the signees included.

The Auburndale Improvement Association, Inc. will not allow the Mayor to push through this proposal or the Mandatory Inclusionary Housing proposal without challenging many of the provisions in both proposals and looking for workable alternatives.



Henry Euler, First Vice President
Auburndale Improvement Association, Inc.

PETITION AGAINST NEW ZONING PROPOSAL

**To: Mayor Bill deBlasio,
Council Speaker Melissa Mark-Viverito,
The New York City Council,
The New York City Department of City Planning,
Queens Borough President Melinda Katz,
Local Elected Leaders,
Community Boards 7 and 11
Queens Civic Congress:**

The undersigned opposes the passing of Mayor deBlasio's proposal "Zoning for Quality and Affordability". Although I/we understand the need for affordable and senior housing in our city, I/we oppose a proposal that will sacrifice many of the gains that have been made through our rezonings over the years that help protect our communities from overdevelopment and inappropriate development. The plan calls for taller and bulkier building construction in certain zoning districts and the reduction or elimination of parking requirements for new senior housing in many areas across the city. Other changes are proposed as well that will negate the progress that we have made. This proposal is going in the opposite direction of what we have fought for in our communities. The public, including concerned individual citizens, community boards, civic associations and other community groups, must be listened to and given an opportunity to contribute input into any proposal that will affect our communities. The Mayor's current proposal should not be enacted.

Signature #1: Robert J. Williamson

Print Name: ROBERT J. WILLIAMSON

Signature #2: Lois M. Williamson

Print Name: LOIS M. WILLIAMSON

Address: 4237 203 Street

BAYSIDE, N.Y. 11361 Date: 9/10/15

Additional Comments (if any): More multiple and/or

high rise, less parking is a
formula for destruction of the
neighborhood!

PETITION AGAINST NEW ZONING PROPOSAL

**To: Mayor Bill deBlasio,
Council Speaker Melissa Mark-Viverito,
The New York City Council,
The New York City Department of City Planning,
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Signature #1: Paula Ventre

Print Name: Paula Ventre

Signature #2: Vito Ventre

Print Name: Vito Ventre

Address: 50 48 193 ST

Fresh Meadows 11365 Date: 9/12/15

Additional Comments (if any):

We've resided at our home for 30 years; watched as
over/poor development allowed; watched density,
and over ~~pop~~ crowding increase. No more!!

PETITION AGAINST NEW ZONING PROPOSAL

**To: Mayor Bill deBlasio,
Council Speaker Melissa Mark-Viverito,
The New York City Council,
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Signature #1:

Alicia Greenberg

Print Name:

ALICIA GREENBERG

Signature #2:

Print Name:

Address:

P.O. Box 580097

FLUSHING N.Y. 11358

Date:

Additional Comments (if any):

You will make it quantity of life not quality - no footprint - just Big & Bigger foot. There are no parking spots anywhere any more - 3 cars to a family. CHECK DMV senior citizens drive -

PETITION AGAINST NEW ZONING PROPOSAL

**To: Mayor Bill deBlasio,
Council Speaker Melissa Mark-Viverito,
The New York City Council,
The New York City Department of City Planning,
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Community Boards 7 and 11
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Signature #1: Eda Santorelli

Print Name: Eda Santorelli

Signature #2: _____

Print Name: _____

Address: 202-04 48 Avenue

Oakland Gardens, New York 11364 Date: 9/9/15

Additional Comments (if any): The bldg. dept's approval of
a cluster of buildings on 47th Ave. between 197^{St.}

& Francis Lewis has reduced the quality of life greatly
in that area; parking is bumper to bumper etc. etc.
The "back yard" buildings are totally
unacceptable. (those behind homes on 197 St)

PETITION AGAINST NEW ZONING PROPOSAL

**To: Mayor Bill deBlasio,
Council Speaker Melissa Mark-Viverito,
The New York City Council,
The New York City Department of City Planning,
Queens Borough President Melinda Katz,
Local Elected Leaders,
Community Boards 7 and 11
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Signature #1:

Mary Ann Zonsky

Print Name:

MARY ANN ZONSKY

Signature #2:

Print Name:

Address:

33-03 191ST ST.

FLUSHING, NY 11358 Date: 9/9/15

Additional Comments (if any):

*Parking and driving are already
a disaster in a city which was built for one
car per household not one car per person.*

PETITION AGAINST NEW ZONING PROPOSAL

**To: Mayor Bill deBlasio,
Council Speaker Melissa Mark-Viverito,
The New York City Council,
The New York City Department of City Planning,
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Signature #1: 

Print Name: CHRISTINA SCITERER

Signature #2: _____

Print Name: _____

Address: 42-50 205 STREET

BAYSIDE NY 11361 Date: 9-15-15

Additional Comments (if any): _____

We fought hard to get our neighborhood rezoned - we do not need more inappropriate development!

PETITION AGAINST NEW ZONING PROPOSAL

**To: Mayor Bill deBlasio,
Council Speaker Melissa Mark-Viverito,
The New York City Council,
The New York City Department of City Planning,
Queens Borough President Melinda Katz,
Local Elected Leaders,
Community Boards 7 and 11
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Signature #1: Edith Pouymari

Print Name: EDITH POUYMARI

Signature #2: John Pouymari

Print Name: John Pouymari

Address: 40-15 170 ST.

Flushing NY 11358 Date: 10/14/15

Additional Comments (if any):

PETITION AGAINST NEW ZONING PROPOSAL

**To: Mayor Bill deBlasio,
Council Speaker Melissa Mark-Viverito,
The New York City Council,
The New York City Department of City Planning,
Queens Borough President Melinda Katz,
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Community Boards 7 and 11
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Signature #1: Richard J. Placente

Print Name: RICHARD J. PLACENTE

Signature #2: Patricia Varnis

Print Name: PATRICIA VARNIS

Address: 50-40 193RD ST.

FRESH MEADOWS, N.Y 11365 Date: 10/6/15

Additional Comments (if any):

PETITION AGAINST NEW ZONING PROPOSAL

**To: Mayor Bill deBlasio,
Council Speaker Melissa Mark-Viverito,
The New York City Council,
The New York City Department of City Planning,
Queens Borough President Melinda Katz,
Local Elected Leaders,
Community Boards 7 and 11
Queens Civic Congress:**

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Signature #1: *Gussie Graffeo*

Print Name: G U S S I E G R A F F E O

Signature #2: _____

Print Name: _____

Address: 169-14 26 Ave

FLUSHING NY 11358 Date: 9/18/15

Additional Comments (if any): _____

PETITION AGAINST NEW ZONING PROPOSAL

**To: Mayor Bill deBlasio,
Council Speaker Melissa Mark-Viverito,
The New York City Council,
The New York City Department of City Planning,
Queens Borough President Melinda Katz,
Local Elected Leaders,
Community Boards 7 and 11
Queens Civic Congress:**

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Signature #1: Kathleen B. Shannon

Print Name: KATHLEEN B. SHANNON

Signature #2: _____

Print Name: _____

Address: 45-09 189 St. Flushing, NY 11358

Date: 10/1/2015

Additional Comments (if any): NO MORE HOUSING. THERE IS
NO PARKING ON THE STREETS. HOWEVER WE COULD
USE A DECENT SUPERMARKET - NO ASIAN MARKET.

PETITION AGAINST NEW ZONING PROPOSAL

**To: Mayor Bill deBlasio,
Council Speaker Melissa Mark-Viverito,
The New York City Council,
The New York City Department of City Planning,
Queens Borough President Melinda Katz,
Local Elected Leaders,
Community Boards 7 and 11
Queens Civic Congress:**

The undersigned opposes the passing of Mayor deBlasio's proposal "Zoning for Quality and Affordability". Although I/we understand the need for affordable and senior housing in our city, I/we oppose a proposal that will sacrifice many of the gains that have been made through our rezonings over the years that help protect our communities from overdevelopment and inappropriate development. The plan calls for taller and bulkier building construction in certain zoning districts and the reduction or elimination of parking requirements for new senior housing in many areas across the city. Other changes are proposed as well that will negate the progress that we have made. This proposal is going in the opposite direction of what we have fought for in our communities. The public, including concerned individual citizens, community boards, civic associations and other community groups, must be listened to and given an opportunity to contribute input into any proposal that will affect our communities. The Mayor's current proposal should not be enacted.

Signature #1:

Charles L. Capeau

Print Name:

Charles L. Capeau

Signature #2:

Rose Marie Capeau

Print Name:

Rose Marie Capeau

Address:

164-12 43 AVE

FLUSHING, NY 11358

Date:

9/9/15

Additional Comments (if any):

*TX payers are floating
the bill for people that are
over wearing the infrastructure of the town. C.B.*

PETITION AGAINST NEW ZONING PROPOSAL

**To: Mayor Bill deBlasio,
Council Speaker Melissa Mark-Viverito,
The New York City Council,
The New York City Department of City Planning,
Queens Borough President Melinda Katz,
Local Elected Leaders,
Community Boards 7 and 11
Queens Civic Congress:**

The undersigned opposes the passing of Mayor deBlasio's proposal "Zoning for Quality and Affordability". Although I/we understand the need for affordable and senior housing in our city, I/we oppose a proposal that will sacrifice many of the gains that have been made through our rezonings over the years that help protect our communities from overdevelopment and inappropriate development. The plan calls for taller and bulkier building construction in certain zoning districts and the reduction or elimination of parking requirements for new senior housing in many areas across the city. Other changes are proposed as well that will negate the progress that we have made. This proposal is going in the opposite direction of what we have fought for in our communities. The public, including concerned individual citizens, community boards, civic associations and other community groups, must be listened to and given an opportunity to contribute input into any proposal that will affect our communities. The Mayor's current proposal should not be enacted.

Signature #1: *Robert Dusek*

Print Name: Robert Dusek

Signature #2: *M Dusek*

Print Name: M DUSEK

Address: 48-14-19 3rd Street

Fresh Meadows NY 11365 Date: 9/10/15

Additional Comments (if any): We live next door to a house that was made much taller than when originally built. It took away the sunshine!

PETITION AGAINST NEW ZONING PROPOSAL

To: Mayor Bill deBlasio
Council Speaker Melissa Mark-Viverito
The New York City Council
The New York City Department of City Planning
Queens Borough President Melinda Katz
Local Elected Leaders
Community Boards 7 and 11
Queens Civic Congress

We oppose the passing of Mayor deBlasio's proposal entitled "Zoning for Quality and Affordability". While we understand the need for affordable and senior housing in our city as contained in the proposal, we oppose a proposal that will sacrifice many of the gains that have been painfully achieved over the years through our rezonings that help protect our communities from overdevelopment and inappropriate development. The proposal calls for taller and bulkier building construction in certain zoning districts and the reduction and/or elimination of parking requirements for new senior housing in many areas throughout the city. Additionally, the proposal contains other changes that will negate the progress achieved to date. This proposal is proceeding in a direction opposite to what we, the people who live and work in the communities, have fought so very hard to achieve. You have an obligation, both moral and ethical, to listen to concerned individual tax paying citizens, community boards, civic associations and other community groups and to provide us an opportunity to contribute input into any proposal that will affect our communities. The Mayor's proposal must NOT be enacted.

Thomas F. Costanzo



Beatrice R. Costanzo



4014 170th Street
Flushing, NY 11358

PETITION AGAINST NEW ZONING PROPOSAL

**To: Mayor Bill deBlasio,
Council Speaker Melissa Mark-Viverito,
The New York City Council,
The New York City Department of City Planning,
Queens Borough President Melinda Katz,
Local Elected Leaders,
Community Boards 7 and 11
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Signature #1:

Stephen W. Fox

Print Name:

Stephen W. Fox

Signature #2:

Anita M. Fox

Print Name:

ANITA M. FOX

Address:

53-07 197 Street

Flushing, NY 11365

Date:

Sept 8, 2015

Additional Comments (if any):

PETITION AGAINST NEW ZONING PROPOSAL

**To: Mayor Bill deBlasio,
Council Speaker Melissa Mark-Viverito,
The New York City Council,
The New York City Department of City Planning,
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Signature #1: Josephine Barcella

Print Name: Josephine Barcella

Signature #2: _____

Print Name: _____

Address: 46-46 194 St.

Flushing Ny 11358 Date: 9/13/15

Additional Comments (if any): _____

PETITION AGAINST NEW ZONING PROPOSAL

**To: Mayor Bill deBlasio,
Council Speaker Melissa Mark-Viverito,
The New York City Council,
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Signature #1: Carlo Perrone

Print Name: CARLO PERRONE

Signature #2: _____

Print Name: _____

Address: 27-09 172 ST.

Flushing NY 11358 Date: 9/12/15

Additional Comments (if any): _____

PETITION AGAINST NEW ZONING PROPOSAL

**To: Mayor Bill deBlasio,
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Signature #1:

Linda A. Diez

Print Name:

Linda A. Diez

Signature #2:

Print Name:

Address:

35-12 171 ST.

Flushing NY 11358

Date:

9/12/15

Additional Comments (if any):

PETITION AGAINST NEW ZONING PROPOSAL

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Council Speaker Melissa Mark-Viverito,
The New York City Council,
The New York City Department of City Planning,
Queens Borough President Melinda Katz,
Local Elected Leaders,
Community Boards 7 and 11
Queens Civic Congress:**

The undersigned opposes the passing of Mayor deBlasio's proposal "Zoning for Quality and Affordability". Although I/we understand the need for affordable and senior housing in our city, I/we oppose a proposal that will sacrifice many of the gains that have been made through our rezonings over the years that help protect our communities from overdevelopment and inappropriate development. The plan calls for taller and bulkier building construction in certain zoning districts and the reduction or elimination of parking requirements for new senior housing in many areas across the city. Other changes are proposed as well that will negate the progress that we have made. This proposal is going in the opposite direction of what we have fought for in our communities. The public, including concerned individual citizens, community boards, civic associations and other community groups, must be listened to and given an opportunity to contribute input into any proposal that will affect our communities. The Mayor's current proposal should not be enacted.

Signature #1: Nancy McLernon

Print Name: Nancy Mc Lennan

Signature #2: James McLernon

Print Name: James McLernon

Address: 169-12-24 Rd

Whitestone NY 11357 Date: _____

Additional Comments (if any): _____

PETITION AGAINST NEW ZONING PROPOSAL

**To: Mayor Bill deBlasio,
Council Speaker Melissa Mark-Viverito,
The New York City Council,
The New York City Department of City Planning,
Queens Borough President Melinda Katz,
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Signature #1:



Print Name:

ROBERT FIELDER

Signature #2:

Print Name:

Address:

24-43 167 ST

Whitestone NY

11357

Date:

9/10/15

Additional Comments (if any):

PETITION AGAINST NEW ZONING PROPOSAL

**To: Mayor Bill deBlasio,
Council Speaker Melissa Mark-Viverito,
The New York City Council,
The New York City Department of City Planning,
Queens Borough President Melinda Katz,
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Signature #1: Saverio Perillo

Print Name: SAVERIO PERILLO

Signature #2: Joanne Perillo

Print Name: JOANNE PERILLO

Address: 42-47 191 STREET

FLUSHING, N.Y 11358 Date: 9/9/15

Additional Comments (if any):

PETITION AGAINST NEW ZONING PROPOSAL

**To: Mayor Bill deBlasio,
Council Speaker Melissa Mark-Viverito,
The New York City Council,
The New York City Department of City Planning,
Queens Borough President Melinda Katz,
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Community Boards 7 and 11
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Signature #1: Irene Dresner

Print Name: Irene Dresner

Signature #2: Byron D

Print Name: BYRON DRESNER

Address: 45-57 189 Street

Flushing N.Y.

Date: 9/8/15

Additional Comments (if any):

PETITION AGAINST NEW ZONING PROPOSAL

**To: Mayor Bill deBlasio,
Council Speaker Melissa Mark-Viverito,
The New York City Council,
The New York City Department of City Planning,
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Signature #1: Barbara A. Saccardi

Print Name: BARBARA A. SACCARDI

Signature #2: _____

Print Name: _____

Address: 166-35 21 AVENUE

WHITESTONE, N.Y. Date: 9-8-2015

Additional Comments (if any): _____

I Hope The Petition is successful!

PETITION AGAINST NEW ZONING PROPOSAL

**To: Mayor Bill deBlasio,
Council Speaker Melissa Mark-Viverito,
The New York City Council,
The New York City Department of City Planning,
Queens Borough President Melinda Katz,
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Signature #1: Theresa Maranguello

Print Name: THERESA MARANGIELLO

Signature #2: _____

Print Name: _____

Address: 172-10 33 AVE

FLUSHING N.Y 11358 Date: 9-9-15

Additional Comments (if any): _____

PETITION AGAINST NEW ZONING PROPOSAL

**To: Mayor Bill deBlasio,
Council Speaker Melissa Mark-Viverito,
The New York City Council,
The New York City Department of City Planning,
Queens Borough President Melinda Katz,
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Signature #1: Karen Biehner

Print Name: KAREN BIEHNER

Signature #2: John W. Biehner

Print Name: JOHN W. BIEHNER

Address: 41-29 170th ST

FLUSHING NY 11358

Date: 9/8/2015

Additional Comments (if any):

PETITION AGAINST NEW ZONING PROPOSAL

**To: Mayor Bill deBlasio,
Council Speaker Melissa Mark-Viverito,
The New York City Council,
The New York City Department of City Planning,
Queens Borough President Melinda Katz,
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Signature #1:

Joseph L. Caruso

Print Name:

JOSEPH L CARUSO

Signature #2:

Elaine Caruso

Print Name:

ELAINE CARUSO

Address:

170-59 Pidgeon Meadow Rd

Fresh Meadows, NY 11365 Date: *9/8/15*

Additional Comments (if any):

PETITION AGAINST NEW ZONING PROPOSAL

**To: Mayor Bill deBlasio,
Council Speaker Melissa Mark-Viverito,
The New York City Council,
The New York City Department of City Planning,
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Signature #1:



Print Name:

YOLANDA STIVANELLO

Signature #2:

Print Name:

Address:

189-50 44th AVE

FLUSHING - N.Y. 11358

Date:

9-9-15

Additional Comments (if any):

PETITION AGAINST NEW ZONING PROPOSAL

**To: Mayor Bill deBlasio,
Council Speaker Melissa Mark-Viverito,
The New York City Council,
The New York City Department of City Planning,
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Signature #1: Margaret Cirincione

Print Name: MARGARET CIRINCIONE

Signature #2: _____

Print Name: _____

Address: 189-40 44th AVE

FLUSHING, NY 11358 Date: 9/9/15

Additional Comments (if any): _____

PETITION AGAINST NEW ZONING PROPOSAL

**To: Mayor Bill deBlasio,
Council Speaker Melissa Mark-Viverito,
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Signature #1:

Joan Menduni

Print Name:

JOAN MENDUNI

Signature #2:

Dominico Menduni

Print Name:

DOMINICO MENDUNI

Address:

45-41 172ND ST

FLUSHING, N.Y. 11358

Date:

9/10/15

Additional Comments (if any):

PETITION AGAINST NEW ZONING PROPOSAL

**To: Mayor Bill deBlasio,
Council Speaker Melissa Mark-Viverito,
The New York City Council,
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Signature #1:

Salvatore R. Santangelo

Print Name:

SALVATORE R. SANTANGELO

Signature #2:

Betty Santangelo

Print Name:

Betty Santangelo

Address:

#3-11 166 St. Flushing NY 11358

Date: _____

Additional Comments (if any):

To. MAYOR B. de BLASIO

Please STOP TRYING TO DESTROY

OUR COMMUNITIES ! - YOU WILL

HEAR FROM US ON ELECTION DAY!

S.R. Santangelo

PETITION AGAINST NEW ZONING PROPOSAL

**To: Mayor Bill deBlasio,
Council Speaker Melissa Mark-Viverito,
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Signature #1: Carolyn Vitale

Print Name: Carolyn Vitale

Signature #2: Joseph V. Vitale

Print Name: Joseph V. Vitale

Address: 173-20 47 Ave

Flushing NY 11358 Date: 9/10/15

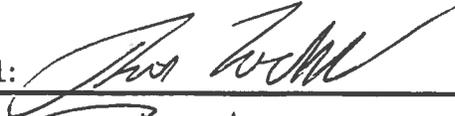
Additional Comments (if any):

PETITION AGAINST NEW ZONING PROPOSAL

**To: Mayor Bill deBlasio,
Council Speaker Melissa Mark-Viverito,
The New York City Council,
The New York City Department of City Planning,
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Signature #1:



Print Name:

Phil Lockwood

Signature #2:



Print Name:

Virginia Lockwood

Address:

3520 191 ST STREET FLUSHING NY 11358

Date:

9/9/15

Additional Comments (if any):

PETITION AGAINST NEW ZONING PROPOSAL

**To: Mayor Bill deBlasio,
Council Speaker Melissa Mark-Viverito,
The New York City Council,
The New York City Department of City Planning,
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Signature #1: Teresa A. Alvarez

Print Name: TERESA A. ALVAREZ

Signature #2: Mario Alvarez

Print Name: Mario Alvarez

Address: 40-03 196 Street
Flushing, NY 11358 Date: 9/8/15

Additional Comments (if any):

Parking is already tight on my
block. We don't need additional
housing. No to basement conversions.

PETITION AGAINST NEW ZONING PROPOSAL

**To: Mayor Bill deBlasio,
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The New York City Council,
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Signature #1: *Peter LeKarger*

Print Name: Peter LEKARGER

Signature #2: _____

Print Name: _____

Address: 47-08 169th

FLUSHING NY 11358 Date: 9/10/15

Additional Comments (if any): _____

PETITION AGAINST NEW ZONING PROPOSAL

**To: Mayor Bill deBlasio,
Council Speaker Melissa Mark-Viverito,
The New York City Council,
The New York City Department of City Planning,
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Signature #1: Norma Keller

Print Name: NORMA KELLER

Signature #2: Nancy Savino

Print Name: NANCY SAVINO

Address: 20-20-169 St.

Whitestone N.Y. 11357 Date: _____

Additional Comments (if any): _____

PETITION AGAINST NEW ZONING PROPOSAL

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Council Speaker Melissa Mark-Viverito,
The New York City Council,
The New York City Department of City Planning,
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Signature #1: Eileen Taylor

Print Name: Eileen Taylor

Signature #2: Arthur Taylor

Print Name: Arthur Taylor

Address: 171-47 Bagley Ave.

Flushing NY 11358 Date: 9-9-15

Additional Comments (if any):

PETITION AGAINST NEW ZONING PROPOSAL

**To: Mayor Bill deBlasio,
Council Speaker Melissa Mark-Viverito,
The New York City Council,
The New York City Department of City Planning,
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Signature #1:

Dario Grdovic

Print Name:

DARIO GRDOVIC

Signature #2:

Catherine Grdovic

Print Name:

CATHERINE GRDOVIC

Address:

189-44 46th AVENUE

FLUSHING NY 11358 Date: 9-9-15

Additional Comments (if any):

PETITION AGAINST NEW ZONING PROPOSAL

**To: Mayor Bill deBlasio,
Council Speaker Melissa Mark-Viverito,
The New York City Council,
The New York City Department of City Planning,
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Signature #1: Robert G. Hessler

Print Name: ROBERT G. HESSLER

Signature #2: Margaret Hessler

Print Name: MARGARET HESSLER

Address: 171-58 GLADWIN AVE

FLUSHING N.Y. 11365 Date: 9-10-15

Additional Comments (if any):

PETITION AGAINST NEW ZONING PROPOSAL

**To: Mayor Bill deBlasio,
Council Speaker Melissa Mark-Viverito,
The New York City Council,
The New York City Department of City Planning,
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Signature #1: Joseph J Swantek Jr

Print Name: JOSEPH J SWANTEK JR

Signature #2: Audrey Swantek

Print Name: AUDREY SWANTEK

Address: 4-8-21 1865

FRESHINS N.Y. 11365 Date: 9/11/15

Additional Comments (if any):

It's impossible to park now.

PETITION AGAINST NEW ZONING PROPOSAL

**To: Mayor Bill deBlasio,
Council Speaker Melissa Mark-Viverito,
The New York City Council,
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Signature #1: Henry Trou

Print Name: HENRY TROUB

Signature #2: _____

Print Name: _____

Address: 4736 198 ST

Date: 9-17-15

Additional Comments (if any): _____

PETITION AGAINST NEW ZONING PROPOSAL

**To: Mayor Bill deBlasio,
Council Speaker Melissa Mark-Viverito,
The New York City Council,
The New York City Department of City Planning,
Queens Borough President Melinda Katz,
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Community Boards 7 and 11
Queens Civic Congress:**

The undersigned opposes the passing of Mayor deBlasio's proposal "Zoning for Quality and Affordability". Although I/w understand the need for affordable and senior housing in our city, I/w oppose a proposal that will sacrifice many of the gains that have been made through our rezonings over the years that help protect our communities from overdevelopment and inappropriate development. The plan calls for taller and bulkier building construction in certain zoning districts and the reduction or elimination of parking requirements for new senior housing in many areas across the city. Other changes are proposed as well that will negate the progress that we have made. This proposal is going in the opposite direction of what we have fought for in our communities. The public, including concerned individual citizens, community boards, civic associations and other community groups, must be listened to and given an opportunity to contribute input into any proposal that will affect our communities. The Mayor's current proposal should not be enacted.

Signature #1: Vincent M. Maltese

Print Name: VINCENT M. MALITSE

Signature #2: _____

Print Name: _____

Address: 199-05 33 Ave

Flushing NY 11358 Date: 9/15/15

Additional Comments (if any): _____

PETITION AGAINST NEW ZONING PROPOSAL

**To: Mayor Bill deBlasio,
Council Speaker Melissa Mark-Viverito,
The New York City Council,
The New York City Department of City Planning,
Queens Borough President Melinda Katz,
Local Elected Leaders,
Community Boards 7 and 11
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Signature #1:



Print Name:

ALEXANDER DiPAOLO

Signature #2:

Print Name:

Address:

43-01 BELL BLVD

BAYSIDE NY 11361

Date:

9/8/15

Additional Comments (if any):

PETITION AGAINST NEW ZONING PROPOSAL

**To: Mayor Bill deBlasio,
Council Speaker Melissa Mark-Viverito,
The New York City Council,
The New York City Department of City Planning,
Queens Borough President Melinda Katz,
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Signature #1: Walter J. Franklin

Print Name: WALTER J. FRANKLIN

Signature #2: _____

Print Name: _____

Address: 169-17 LITHONIA AVE

FRESH MEADOWS, N.Y. 11365 Date: 9/9/15

Additional Comments (if any): LEAVE OUR COMMUNITY

ALONE!

PETITION AGAINST NEW ZONING PROPOSAL

**To: Mayor Bill deBlasio,
Council Speaker Melissa Mark-Viverito,
The New York City Council,
The New York City Department of City Planning,
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Signature #1:

Edward Sapanaro

Print Name:

EDWARD SAPANARO

Signature #2:

Marie Sapanaro

Print Name:

MARIE SAPANARO

Address:

42-12 193 ST.

Flushing ny 11358

Date:

9/15/15

Additional Comments (if any):

PETITION AGAINST NEW ZONING PROPOSAL

**To: Mayor Bill deBlasio,
Council Speaker Melissa Mark-Viverito,
The New York City Council,
The New York City Department of City Planning,
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Signature #1: Rose Genev

Print Name: ROSE GENEV

Signature #2: _____

Print Name: _____

Address: 196-55 45th Rd

Flushing NY 11358 Date: 9/16/15

Additional Comments (if any): _____

PETITION AGAINST NEW ZONING PROPOSAL

**To: Mayor Bill deBlasio,
Council Speaker Melissa Mark-Viverito,
The New York City Council,
The New York City Department of City Planning,
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Signature #1: Donna McLernon

Print Name: DONNA MCLERNON

Signature #2: William McLernon III

Print Name: BILL MCLERNON III

Address: 29-19 170th street

Flushing NY 11358 Date: 9/8/15

Additional Comments (if any):

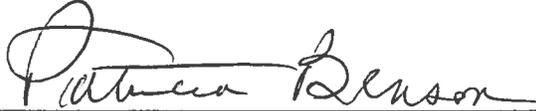
Please!

PETITION AGAINST NEW ZONING PROPOSAL

**To: Mayor Bill deBlasio,
Council Speaker Melissa Mark-Viverito,
The New York City Council,
The New York City Department of City Planning,
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Signature #1:



Print Name:

PATRICIA BENSON

Signature #2:

Print Name:

Address:

196-49 45 ROAD

FLUSHING, NEW YORK 11358 Date: 9-10-15

Additional Comments (if any):

PETITION AGAINST NEW ZONING PROPOSAL

**To: Mayor Bill deBlasio,
Council Speaker Melissa Mark-Viverito,
The New York City Council,
The New York City Department of City Planning,
Queens Borough President Melinda Katz,
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Community Boards 7 and 11
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Signature #1: Maria Le Gall

Print Name: MARIA LE GALL

Signature #2: Jean Le Gall

Print Name: JEAN LE GALL

Address: 171-03 33 AVENUE

Flushing NY 11358

Date: Sept 10 2015

Additional Comments (if any):

PETITION AGAINST NEW ZONING PROPOSAL

**To: Mayor Bill deBlasio,
Council Speaker Melissa Mark-Viverito,
The New York City Council,
The New York City Department of City Planning,
Queens Borough President Melinda Katz,
Local Elected Leaders,
Community Boards 7 and 11
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Signature #1:

Linda Leazer

Print Name:

Linda Leazer

Signature #2:

Karen Lieu

Print Name:

Karen Lieu

Address:

43-39 189 St.

Flushing, NY 11358

Date:

9/10/15

Additional Comments (if any):

PETITION AGAINST NEW ZONING PROPOSAL

**To: Mayor Bill deBlasio,
Council Speaker Melissa Mark-Viverito,
The New York City Council,
The New York City Department of City Planning,
Queens Borough President Melinda Katz,
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Community Boards 7 and 11
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Signature #1: Johanna Havreluk

Print Name: JOHANNA R HAVRELUK

Signature #2: John Havreluk

Print Name: JOHN HAVRELUK

Address: 53-07-192 Street

FRESH MEADOWS, N.Y. 11365-1232 Date: Sept. 9, 2015

Additional Comments (if any):

THANK YOU FOR FOLLOWING UP ON SUCH IMPORTANT ISSUES.

PETITION AGAINST NEW ZONING PROPOSAL

**To: Mayor Bill deBlasio,
Council Speaker Melissa Mark-Viverito,
The New York City Council,
The New York City Department of City Planning,
Queens Borough President Melinda Katz,
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Community Boards 7 and 11
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Signature #1: *Valent Asalone*

Print Name: VALENT ASALONE

Signature #2: *Antonette Asalone*

Print Name: ANTONETTE ASALONE

Address: 4378 195th ST

FLUSHING NY 11365 Date: 9/10/15

Additional Comments (if any):

PETITION AGAINST NEW ZONING PROPOSAL

**To: Mayor Bill deBlasio,
Council Speaker Melissa Mark-Viverito,
The New York City Council,
The New York City Department of City Planning,
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Local Elected Leaders,
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Signature #1: Joseph V Brigante

Print Name: JOSEPH V BRIGANTE

Signature #2: Catherine Brigante

Print Name: Catherine Brigante

Address: 56-03 196th PLACE

Fresh Meadow, NY, 11365 Date: 9-10-15

Additional Comments (if any): DON'T WANT TO SEE ALL

THE HARD WORK PEOPLE DID TO STOP

OVERDEVELOPMENT GO TO WASTE

PETITION AGAINST NEW ZONING PROPOSAL

**To: Mayor Bill deBlasio,
Council Speaker Melissa Mark-Viverito,
The New York City Council,
The New York City Department of City Planning,
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Signature #1:

Barbara Errico

Print Name:

BARBARA ERRICO

Signature #2:

Paul Errico

Print Name:

PAUL ERRICO

Address:

45-16 171st Street

Auburndale NY 11358

Date: 9/10/15

Additional Comments (if any):

*We think the proposal is preposterous!
We have worked hard to keep our neighborhood
from overcrowding*

PETITION AGAINST NEW ZONING PROPOSAL

**To: Mayor Bill deBlasio,
Council Speaker Melissa Mark-Viverito,
The New York City Council,
The New York City Department of City Planning,
Queens Borough President Melinda Katz,
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Signature #1:

I. J. Evans

Print Name:

IGNATIUS J. EVANS

Signature #2:

Patricia A. Evans

Print Name:

PATRICIA A. EVANS

Address:

43-24 170 St

FLUSHING, NY 11358

Date:

9/8/15

Additional Comments (if any):

*I AM VERY DISAPPOINTED IN THIS
ADMINISTRATION.*

PETITION AGAINST NEW ZONING PROPOSAL

**To: Mayor Bill deBlasio,
Council Speaker Melissa Mark-Viverito,
The New York City Council,
The New York City Department of City Planning,
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Signature #1:

John Schwemmer

Print Name:

JOHN SCHWEMMER

Signature #2:

Susan Schwemmer

Print Name:

SUSAN SCHWEMMER

Address:

175-52 Underhill Ave

F. Meadowz NY 11365

Date:

9/11/15

Additional Comments (if any):

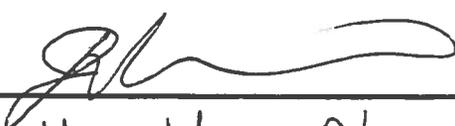
PETITION AGAINST NEW ZONING PROPOSAL

**To: Mayor Bill deBlasio,
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Signature #1: Munshik Park

Print Name: Munshik (Les) Park

Signature #2: 

Print Name: Hye Min Rho

Address: 32-29 190th St. Flushing, NY 11358

Date: 9/11/2015

Additional Comments (if any):

PETITION AGAINST NEW ZONING PROPOSAL

**To: Mayor Bill deBlasio,
Council Speaker Melissa Mark-Viverito,
The New York City Council,
The New York City Department of City Planning,
Queens Borough President Melinda Katz,
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Community Boards 7 and 11
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Signature #1:

John Mastando, Jr.

Print Name:

JOHN MASTANDO, JR.

Signature #2:

Phyllis Mastando

Print Name:

PHYLLIS MASTANDO

Address:

45-33 194th St. FLUSHING, N.Y. 11358

Date: 9/10/15

Additional Comments (if any):

How about making some of these narrow streets here in Flushing One Way. Especially near schools + churches.

PETITION AGAINST NEW ZONING PROPOSAL

**To: Mayor Bill deBlasio,
Council Speaker Melissa Mark-Viverito,
The New York City Council,
The New York City Department of City Planning,
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Signature #1: Patrick T. Schweiger

Print Name: PATRICK T. SCHWEIGER

Signature #2: Kathleen D. Schweiger

Print Name: KATHLEEN D. SCHWEIGER

Address: 29-26 166TH ST

FLUSHING, N.Y. 11358 Date: 9/11/2015

Additional Comments (if any):

If it's not broken don't fix it

PETITION AGAINST NEW ZONING PROPOSAL

**To: Mayor Bill deBlasio,
Council Speaker Melissa Mark-Viverito,
The New York City Council,
The New York City Department of City Planning,
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Signature #1: George Donahue

Print Name: GEORGE DONAHUE

Signature #2: Mary J Donahue

Print Name: MARY J. DONAHUE

Address: 45-67 194 St.

Flushing, N.Y 11358

Date: Sept. 10, 2015

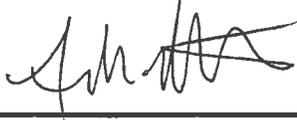
Additional Comments (if any): _____

PETITION AGAINST NEW ZONING PROPOSAL

**To: Mayor Bill deBlasio,
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Signature #1:



Print Name:

Frank Ventura

Signature #2:



Print Name:

Kim Ventura

Address:

45-28 192nd St

Flushing ny 11358

Date:

9/10/15

Additional Comments (if any):

PETITION AGAINST NEW ZONING PROPOSAL

**To: Mayor Bill deBlasio,
Council Speaker Melissa Mark-Viverito,
The New York City Council,
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Signature #1: John E. Heubish
Print Name: JOHN E. HEUBISH

Signature #2: Gayle R Heubish
Print Name: Gayle R Heubish

Address: 50-23 192St, Flushing NY 11368

Date: _____

Additional Comments (if any):

PETITION AGAINST NEW ZONING PROPOSAL

**To: Mayor Bill deBlasio,
Council Speaker Melissa Mark-Viverito,
The New York City Council,
The New York City Department of City Planning,
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Community Boards 7 and 11
Queens Civic Congress:**

The undersigned opposes the passing of Mayor deBlasio's proposal "Zoning for Quality and Affordability". Although I/we understand the need for affordable and senior housing in our city, I/we oppose a proposal that will sacrifice many of the gains that have been made through our rezonings over the years that help protect our communities from overdevelopment and inappropriate development. The plan calls for taller and bulkier building construction in certain zoning districts and the reduction or elimination of parking requirements for new senior housing in many areas across the city. Other changes are proposed as well that will negate the progress that we have made. This proposal is going in the opposite direction of what we have fought for in our communities. The public, including concerned individual citizens, community boards, civic associations and other community groups, must be listened to and given an opportunity to contribute input into any proposal that will affect our communities. The Mayor's current proposal should not be enacted.

Signature #1:

Olga Cartaino

Print Name:

OLGA CARTAINO

Signature #2:

Print Name:

Address:

44-07 196 ST.

Fresheng NY 11358

Date:

9/11/15

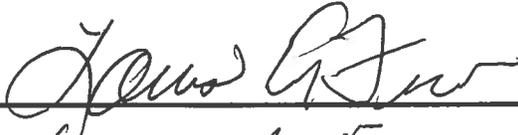
Additional Comments (if any):

PETITION AGAINST NEW ZONING PROPOSAL

**To: Mayor Bill deBlasio,
Council Speaker Melissa Mark-Viverito,
The New York City Council,
The New York City Department of City Planning,
Queens Borough President Melinda Katz,
Local Elected Leaders,
Community Boards 7 and 11
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Signature #1:



Print Name:

Louis A. Fico

Signature #2:

Print Name:

Address:

50-36 194th STREET

FRESH MEADOWS NY 11365

Date:

9-8-15

Additional Comments (if any):

PETITION AGAINST NEW ZONING PROPOSAL

**To: Mayor Bill deBlasio,
Council Speaker Melissa Mark-Viverito,
The New York City Council,
The New York City Department of City Planning,
Queens Borough President Melinda Katz,
Local Elected Leaders,
Community Boards 7 and 11
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Signature #1:

Jayne Capozzi

Print Name:

JAYNE CAPOZZI

Signature #2:

John Capozzi

Print Name:

John Capozzi

Address:

43-24 205th Street

BAYSIDE, NY 11361

Date:

9/9/15

Additional Comments (if any):

PETITION AGAINST NEW ZONING PROPOSAL

**To: Mayor Bill deBlasio,
Council Speaker Melissa Mark-Viverito,
The New York City Council,
The New York City Department of City Planning,
Queens Borough President Melinda Katz,
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Signature #1:

Susan Kababik

Print Name:

SUSAN KABABIK

Signature #2:

Print Name:

Address:

45-62 171ST STREET

FLUSHING, NY 11358-3340

Date: 9/9/15

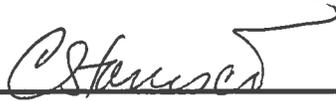
Additional Comments (if any):

PETITION AGAINST NEW ZONING PROPOSAL

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Council Speaker Melissa Mark-Viverito,
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The New York City Department of City Planning,
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Signature #1:



Print Name:

C. STANISCI

Signature #2:



Print Name:

A. STANISCI

Address:



Mrs. A. Stanisci
4727 198th St.
Flushing, NY 11358-3938

Date:

9-8-15

Additional Comments (if any):

PETITION AGAINST NEW ZONING PROPOSAL

**To: Mayor Bill deBlasio,
Council Speaker Melissa Mark-Viverito,
The New York City Council,
The New York City Department of City Planning,
Queens Borough President Melinda Katz,
Local Elected Leaders,
Community Boards 7 and 11
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Signature #1: Elaine J. Gelardi

Print Name: ELAINE J. GELARDI

Signature #2: Marian Rausa

Print Name: MARIAN RAUSA

Address: 171-04 PIGEON MEADOW Rd

FLUSHING NY 11365 Date: 9/8/15

Additional Comments (if any):

PETITION AGAINST NEW ZONING PROPOSAL

To: Mayor Bill deBlasio,
Council Speaker Melissa Mark-Viverito,
The New York City Council,
The New York City Department of City Planning,
Queens Borough President Melinda Katz,
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Community Boards 7 and 11
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Signature #1: Maria Costanzo

Print Name: MARIA COSTANZO

Signature #2: _____

Print Name: _____

Address: 47-09 192 ST.

AUBURNDALE, NY 11358 Date: 9-9-15

Additional Comments (if any): Please do not provide
yet another reason to consider
moving out of NY City / Queens

MAIL TO:
AUBURNDALE IMPROVEMENT ASSOC.
P.O. BOX 580331 - STATION A
FLUSHING, N.Y. 11358-0331

PETITION AGAINST NEW ZONING PROPOSAL

**To: Mayor Bill deBlasio,
Council Speaker Melissa Mark-Viverito,
The New York City Council,
The New York City Department of City Planning,
Queens Borough President Melinda Katz,
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Community Boards 7 and 11
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Signature #1: Jean Merolla

Print Name: JEAN MEROLLA

Signature #2: _____

Print Name: _____

Address: 194-08 53 Ave

FRESH MEADOWS, NY, 11365 Date: 9/8/15

Additional Comments (if any): _____

PETITION AGAINST NEW ZONING PROPOSAL

**To: Mayor Bill deBlasio,
Council Speaker Melissa Mark-Viverito,
The New York City Council,
The New York City Department of City Planning,
Queens Borough President Melinda Katz,
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Signature #1: _____

Mary Ellen Donovan

Print Name: _____

MARY ELLEN DONOVAN

Signature #2: _____

Print Name: _____

Address: _____

45-39 168 ST.

FLUSHING, NY 11358

Date: _____

9/10/11

Additional Comments (if any): _____

PETITION AGAINST NEW ZONING PROPOSAL

**To: Mayor Bill deBlasio,
Council Speaker Melissa Mark-Viverito,
The New York City Council,
The New York City Department of City Planning,
Queens Borough President Melinda Katz,
Local Elected Leaders,
Community Boards 7 and 11
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Signature #1: Richard Sowa

Print Name: Richard Sowa

Signature #2: Veronica Sowa

Print Name: Veronica Sowa

Address: 46-31 196 Plce Flushing NY 11358

Date: 9/9/15

Additional Comments (if any):

PETITION AGAINST NEW ZONING PROPOSAL

**To: Mayor Bill deBlasio,
Council Speaker Melissa Mark-Viverito,
The New York City Council,
The New York City Department of City Planning,
Queens Borough President Melinda Katz,
Local Elected Leaders,
Community Boards 7 and 11
Queens Civic Congress:**

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Signature #1:

Charles F. Taibi

Print Name:

Charles F. Taibi

Signature #2:

Elisa Taibi

Print Name:

Elisa Taibi

Address:

47-25 190th Street

Flushing, NY 11358

Date: Sept. 9, 2015

Additional Comments (if any):

This proposal will hurt hard working middle class New Yorkers by making their neighborhoods congested and reduce their quality of life.

PETITION AGAINST NEW ZONING PROPOSAL

**To: Mayor Bill deBlasio,
Council Speaker Melissa Mark-Viverito,
The New York City Council,
The New York City Department of City Planning,
Queens Borough President Melinda Katz,
Local Elected Leaders,
Community Boards 7 and 11
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Signature #1:  _____

Print Name: Richard Longueira

Signature #2:  _____

Print Name: Jeanne Longueira

Address: 45-44 169th Street

Flushing, ny. 11358 Date: 09/09/15

Additional Comments (if any):

PETITION AGAINST NEW ZONING PROPOSAL

**To: Mayor Bill deBlasio,
Council Speaker Melissa Mark-Viverito,
The New York City Council,
The New York City Department of City Planning,
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Signature #1: Gwendolyn Vulpio

Print Name: GWENDOLYN VULPIO

Signature #2: Nunzio J. Vulpio

Print Name: NUNZIO J. VULPIO

Address: 33-27 191 St.

FLUSHING NY 11358 Date: 9-9-15

Additional Comments (if any):

PETITION AGAINST NEW ZONING PROPOSAL

To: Mayor Bill deBlasio,
Council Speaker Melissa Mark-Viverito,
The New York City Council,
The New York City Department of City Planning,
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Community Boards 7 and 11
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Signature #1:

Yolanda Paolini

Print Name:

YOLANDA PAOLINI

Signature #2:

Sue Anne King

Print Name:

Sue Anne King

Address:

47-68 195 St.

Flushing NY 11358

Date: 9/10/15

Additional Comments (if any):

Your proposal will crush further a community that is already overwhelmed by daily violations in zoning. Two family homes are housing multiple families in their basements and parking in my community is teeming with cars. Some driveways have several cars with driveways blocked to accommodate these who live and work here. "Quality and Affordability" for a broken zoning. Fix the problem.

PETITION AGAINST NEW ZONING PROPOSAL

**To: Mayor Bill deBlasio,
Council Speaker Melissa Mark-Viverito,
The New York City Council,
The New York City Department of City Planning,
Queens Borough President Melinda Katz,
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Signature #1: Robert W. Moore

Print Name: ROBERT W. MOORE

Signature #2: Florence Moore

Print Name: FLORENCE MOORE

Address: 5114 199TH ST. FLUSHING, N.Y. 11365

Date: 9/9/15

Additional Comments (if any):

PETITION AGAINST NEW ZONING PROPOSAL

**To: Mayor Bill deBlasio,
Council Speaker Melissa Mark-Viverito,
The New York City Council,
The New York City Department of City Planning,
Queens Borough President Melinda Katz,
Local Elected Leaders,
Community Boards 7 and 11
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Signature #1: Anthony Koutsouradis

Print Name: Anthony Koutsouradis

Signature #2: Lisa Koutsouradis

Print Name: Lisa Koutsouradis

Address: 34-12 204th Street Bayside NY 11361

Date: 9/9/15

Additional Comments (if any):

PETITION AGAINST NEW ZONING PROPOSAL

**To: Mayor Bill deBlasio,
Council Speaker Melissa Mark-Viverito,
The New York City Council,
The New York City Department of City Planning,
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Signature #1: Gary A. Hartz

Print Name: Gary A. Hartz

Signature #2: Maryanne Hartz

Print Name: Maryanne Hartz

Address: 47-24 190 ST.

Flushing, N.Y. 11358 Date: 9-10-15

Additional Comments (if any):

PETITION AGAINST NEW ZONING PROPOSAL

**To: Mayor Bill deBlasio,
Council Speaker Melissa Mark-Viverito,
The New York City Council,
The New York City Department of City Planning,
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Signature #1: 

Print Name: Sergio Nicolich

Signature #2: 

Print Name: John Nicolich

Address: 32-14-170th Flushing NY 11358

Date: 9/2/15

Additional Comments (if any):

PETITION AGAINST NEW ZONING PROPOSAL

**To: Mayor Bill deBlasio,
Council Speaker Melissa Mark-Viverito,
The New York City Council,
The New York City Department of City Planning,
Queens Borough President Melinda Katz,
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Signature #1:

Laurel Thomas

Print Name:

LAUREL THOMAS

Signature #2:

Print Name:

Address:

163-27 20th Avenue

White Stone, NY 11357-4020

Date:

9/09/2015

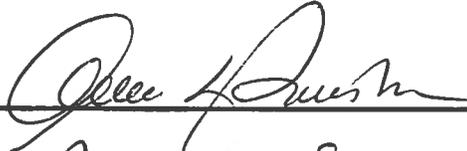
Additional Comments (if any):

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Council Speaker Melissa Mark-Viverito,
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The New York City Department of City Planning,
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Signature #1:



Print Name:

ANNE L. SANITATE

Signature #2:

Print Name:

Address:

35-54 171 ST.

Auburndale, NY 11358

Date:

9/10/15

Additional Comments (if any):

STOP RUINING OUR COMMUNITIES !

PETITION AGAINST NEW ZONING PROPOSAL

**To: Mayor Bill deBlasio,
Council Speaker Melissa Mark-Viverito,
The New York City Council,
The New York City Department of City Planning,
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Signature #1: Eileen Woods

Print Name: Eileen Woods

Signature #2: _____

Print Name: _____

Address: 43-52 169 Street

Flushing, N.Y., 11358 Date: 9.9.2015

Additional Comments (if any): _____

PETITION AGAINST NEW ZONING PROPOSAL

**To: Mayor Bill deBlasio,
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The New York City Department of City Planning,
Queens Borough President Melinda Katz,
Local Elected Leaders,
Community Boards 7 and 11
Queens Civic Congress:**

The undersigned opposes the passing of Mayor deBlasio's proposal "Zoning for Quality and Affordability". Although I/we understand the need for affordable and senior housing in our city, I/we oppose a proposal that will sacrifice many of the gains that have been made through our rezonings over the years that help protect our communities from overdevelopment and inappropriate development. The plan calls for taller and bulkier building construction in certain zoning districts and the reduction or elimination of parking requirements for new senior housing in many areas across the city. Other changes are proposed as well that will negate the progress that we have made. This proposal is going in the opposite direction of what we have fought for in our communities. The public, including concerned individual citizens, community boards, civic associations and other community groups, must be listened to and given an opportunity to contribute input into any proposal that will affect our communities. The Mayor's current proposal should not be enacted.

Signature #1: Connie Thorsen

Print Name: Connie Thorsen

Signature #2: _____

Print Name: _____

Address: 189-47 43rd Rd.

Flushing NY 11358

Date: Sept 9, 2015

Additional Comments (if any): _____

PETITION AGAINST NEW ZONING PROPOSAL

**To: Mayor Bill deBlasio,
Council Speaker Melissa Mark-Viverito,
The New York City Council,
The New York City Department of City Planning,
Queens Borough President Melinda Katz,
Local Elected Leaders,
Community Boards 7 and 11
Queens Civic Congress:**

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Signature #1:

Patricia Finley

Print Name:

PATRICIA FINLEY

Signature #2:

>

Print Name:

Address:

33-64 171 ST

FLUSHING NY 11358

Date:

9/8/15

Additional Comments (if any):

Please stop RUINING OUR

NEIGHBORHOODS WITH OVERCROWDING. WE

NEED QUALITY TO OUR LIVES.

PETITION AGAINST NEW ZONING PROPOSAL

**To: Mayor Bill deBlasio,
Council Speaker Melissa Mark-Viverito,
The New York City Council,
The New York City Department of City Planning,
Queens Borough President Melinda Katz,
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Signature #1: Andrew Ziegler

Print Name: ANDREW ZIEGLER

Signature #2 Kathleen Ziegler

Print Name: KATHLEEN ZIEGLER

Address: 19615 48 AV

Fresh Meadows, NY 11365 Date: 9/8/15

Additional Comments (if any):

PETITION AGAINST NEW ZONING PROPOSAL

**To: Mayor Bill deBlasio,
Council Speaker Melissa Mark-Viverito,
The New York City Council,
The New York City Department of City Planning,
Queens Borough President Melinda Katz,
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Community Boards 7 and 11
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Signature #1:

Barbara Nasewicz

Print Name:

Barbara Nasewicz

Signature #2:

Print Name:

Address:

29-20 163 Street

Flushing, NY 11358

Date:

9/8/15

Additional Comments (if any):

PETITION AGAINST NEW ZONING PROPOSAL

**To: Mayor Bill deBlasio,
Council Speaker Melissa Mark-Viverito,
The New York City Council,
The New York City Department of City Planning,
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Signature #1:

Ellen A. Schiavone

Print Name:

ELLEN A. SCHIAVONE

Signature #2:

Print Name:

Address:

78-18 188 ST.

Flushing NY 11365

Date:

9/15/15

Additional Comments (if any):

PETITION AGAINST NEW ZONING PROPOSAL

**To: Mayor Bill deBlasio,
Council Speaker Melissa Mark-Viverito,
The New York City Council,
The New York City Department of City Planning,
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Signature #1:

Nitza Carrasco

Print Name:

NITZA CARRASCO

Signature #2:

Victor Carrasco

Print Name:

VICTOR CARRASCO

Address:

173-23 47th Avenue, Flushing

New York

Date:

9/8/15

Additional Comments (if any):

Look at the disaster in
Main Street Flushing over develop. It is insane
too many buildings - no space, no parking space - dirty
noisy and ugly. On holidays you can even reach the
area by car, but too much traffic and you can even
walk to crowded. Ridiculous! Madness!

PETITION AGAINST NEW ZONING PROPOSAL

**To: Mayor Bill deBlasio,
Council Speaker Melissa Mark-Viverito,
The New York City Council,
The New York City Department of City Planning,
Queens Borough President Melinda Katz,
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Signature #1:

Gary Hsu

Print Name:

Gary Hsu

Signature #2:

Katie Hsu

Print Name:

Katie Hsu

Address:

29-28 169th St.

Flushing, NY 11358

Date: 9/10/15

Additional Comments (if any):

PETITION AGAINST NEW ZONING PROPOSAL

**To: Mayor Bill deBlasio,
Council Speaker Melissa Mark-Viverito,
The New York City Council,
The New York City Department of City Planning,
Queens Borough President Melinda Katz,
Local Elected Leaders,
Community Boards 7 and 11
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Signature #1: Elaine C. Reilly

Print Name: ELAINE C. REILLY

Signature #2: _____

Print Name: _____

Address: 53-16 194 ST

FRESH MEADOWS NY 11365 Date: 9/8/2015

Additional Comments (if any): _____

PETITION AGAINST NEW ZONING PROPOSAL

**To: Mayor Bill deBlasio,
Council Speaker Melissa Mark-Viverito,
The New York City Council,
The New York City Department of City Planning,
Queens Borough President Melinda Katz,
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Signature #1: Norma Balducci

Print Name: NORMA BALDUCCI

Signature #2: Joseph J. Balducci

Print Name: JOSEPH J. BALDUCCI

Address: 29-41 171 Street

FLUSHING, NY 11358 Date: 8 Sept. 2015

Additional Comments (if any): _____

PETITION AGAINST NEW ZONING PROPOSAL

**To: Mayor Bill deBlasio,
Council Speaker Melissa Mark-Viverito,
The New York City Council,
The New York City Department of City Planning,
Queens Borough President Melinda Katz,
Local Elected Leaders,
Community Boards 7 and 11
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Signature #1: Martin Munch

Print Name: MARTIN MUNCH

Signature #2: Patricia J Munch

Print Name: PATRICIA J MUNCH

Address: 46-09 196 PL Flushing NY 11358

Date: 9/10/15

Additional Comments (if any):

PETITION AGAINST NEW ZONING PROPOSAL

**To: Mayor Bill deBlasio,
Council Speaker Melissa Mark-Viverito,
The New York City Council,
The New York City Department of City Planning,
Queens Borough President Melinda Katz,
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Community Boards 7 and 11
Queens Civic Congress:**

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Signature #1: Rosalie H. Winslow

Print Name: ROSALIE H. WINSLOW

Signature #2: _____

Print Name: _____

Address: 189-19-39th AVE

AUBURNDALE NY 11358 Date: 9-14-2015

Additional Comments (if any):

PETITION AGAINST NEW ZONING PROPOSAL

**To: Mayor Bill deBlasio,
Council Speaker Melissa Mark-Viverito,
The New York City Council,
The New York City Department of City Planning,
Queens Borough President Melinda Katz,
Local Elected Leaders,
Community Boards 7 and 11
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Signature #1: Concetta Karosos

Print Name: CONCETTA KAROSOS

Signature #2: Eva M Karosos

Print Name: EVA M. KAROSOS

Address: 47-28 167 ST

FLUSHING, NY 11358 Date: 9/14/15

Additional Comments (if any):

PETITION AGAINST NEW ZONING PROPOSAL

**To: Mayor Bill deBlasio,
Council Speaker Melissa Mark-Viverito,
The New York City Council,
The New York City Department of City Planning,
Queens Borough President Melinda Katz,
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Community Boards 7 and 11
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Signature #1: Jeroma T. Carubia

Print Name: JEROMA T. CARUBIA

Signature #2: _____

Print Name: _____

Address: 199-03 58 Ave

Fleetsburg 11365 Date: 9/17/15

Additional Comments (if any): _____

PETITION AGAINST NEW ZONING PROPOSAL

**To: Mayor Bill deBlasio,
Council Speaker Melissa Mark-Viverito,
The New York City Council,
The New York City Department of City Planning,
Queens Borough President Melinda Katz,
Local Elected Leaders,
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Signature #1: Maria Santalesa

Print Name: MARIA SANTALESA

Signature #2: LOUIS SANTALESA

Print Name: Louis Santalesa

Address: 29-35 170 ST

FLUSHING, N.Y. 11358

Date: 9/10/2015

Additional Comments (if any):

WE DO NOT NEED CHANGE JUST

ENFORCE THE CURRENT LAWS

PETITION AGAINST NEW ZONING PROPOSAL

**To: Mayor Bill deBlasio,
Council Speaker Melissa Mark-Viverito,
The New York City Council,
The New York City Department of City Planning,
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Signature #1: Margaret Rappold

Print Name: MARGARET RAPPOLD

Signature #2: _____

Print Name: _____

Address: 171-50 Courtney Ave.

FLUSHING, NY 11358 Date: Sept. 16, 2015

Additional Comments (if any):

PETITION AGAINST NEW ZONING PROPOSAL

**To: Mayor Bill deBlasio,
Council Speaker Melissa Mark-Viverito,
The New York City Council,
The New York City Department of City Planning,
Queens Borough President Melinda Katz,
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Signature #1: Jo Ann Kelly

Print Name: JO ANN KELTY

Signature #2: Fred Kelly

Print Name: FRED KELTY

Address: 49-48 169 ST.

FLUSHING, N.Y. 11365

Date: 9-14-15

Additional Comments (if any):

PETITION AGAINST NEW ZONING PROPOSAL

**To: Mayor Bill deBlasio,
Council Speaker Melissa Mark-Viverito,
The New York City Council,
The New York City Department of City Planning,
Queens Borough President Melinda Katz,
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Signature #1: Christopher T. DeNico

Print Name: Christopher T. DeNico

Signature #2: Karen DeNico

Print Name: Karen DeNico

Address: - 174 -09 Pidgeon Meadow Rd

Fresh Meadows, NY 11365 Date: 9/14/15

Additional Comments (if any):

PETITION AGAINST NEW ZONING PROPOSAL

**To: Mayor Bill deBlasio,
Council Speaker Melissa Mark-Viverito,
The New York City Council,
The New York City Department of City Planning,
Queens Borough President Melinda Katz,
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Signature #1: Jeanine Cognard

Print Name: Jeanine Cognard

Signature #2: Joseph Cognard

Print Name: Joseph Cognard

Address: 47-02 169 St.

Flushing, N.Y. 11358 Date: 9/14/15

Additional Comments (if any):

PETITION AGAINST NEW ZONING PROPOSAL

**To: Mayor Bill deBlasio,
Council Speaker Melissa Mark-Viverito,
The New York City Council,
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Signature #1: Christine Patrizzo

Print Name: Christine Patrizzo

Signature #2: Michael Patrizzo

Print Name: Michael Patrizzo

Address: 49-44 169th Street

Fresh Meadows NY 11365 Date: 9-12-15

Additional Comments (if any):

PETITION AGAINST NEW ZONING PROPOSAL

**To: Mayor Bill deBlasio,
Council Speaker Melissa Mark-Viverito,
The New York City Council,
The New York City Department of City Planning,
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Signature #1: Joseph Brucato

Print Name: JOSEPH BRUCATO

Signature #2: Kathleen Brucato

Print Name: Kathleen Brucato

Address: 29-15 170 ST

FLUSHING NY 11358 Date: 10-14-15

Additional Comments (if any):

PETITION AGAINST NEW ZONING PROPOSAL

**To: Mayor Bill deBlasio,
Council Speaker Melissa Mark-Viverito,
The New York City Council,
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Signature #1: Jack Soulier

Print Name: JACK SOULIER

Signature #2: Jacquelyn Soulier

Print Name: Jacquelyn Soulier

Address: 40-31 172 St

Flushing NY 11358 Date: 9/15/15

Additional Comments (if any): If I wanted to live in

a neighborhood with apt. houses I

would not have moved to my neighborhood

PETITION AGAINST NEW ZONING PROPOSAL

**To: Mayor Bill deBlasio,
Council Speaker Melissa Mark-Viverito,
The New York City Council,
The New York City Department of City Planning,
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Signature #1: Coralie Hafkin

Print Name: Coralie Hafkin

Signature #2: Ira Hafkin

Print Name: Ira Hafkin

Address: 45-22 189th St.

Auburndale NY 11358 Date: 9/12/15

Additional Comments (if any):

PETITION AGAINST NEW ZONING PROPOSAL

**To: Mayor Bill deBlasio,
Council Speaker Melissa Mark-Viverito,
The New York City Council,
The New York City Department of City Planning,
Queens Borough President Melinda Katz,
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Community Boards 7 and 11
Queens Civic Congress:**

The undersigned opposes the passing of Mayor deBlasio's proposal "Zoning for Quality and Affordability". Although I/we understand the need for affordable and senior housing in our city, I/we oppose a proposal that will sacrifice many of the gains that have been made through our rezonings over the years that help protect our communities from overdevelopment and inappropriate development. The plan calls for taller and bulkier building construction in certain zoning districts and the reduction or elimination of parking requirements for new senior housing in many areas across the city. Other changes are proposed as well that will negate the progress that we have made. This proposal is going in the opposite direction of what we have fought for in our communities. The public, including concerned individual citizens, community boards, civic associations and other community groups, must be listened to and given an opportunity to contribute input into any proposal that will affect our communities. The Mayor's current proposal should not be enacted.

Signature #1:

John Ledwith

Print Name:

John Ledwith

Signature #2:

Philomena Ledwith

Print Name:

Philomena Ledwith

Address:

43 - 50 - 172 St

Flushing 11358

Date:

9-9-15

Additional Comments (if any):

PETITION AGAINST NEW ZONING PROPOSAL

**To: Mayor Bill deBlasio,
Council Speaker Melissa Mark-Viverito,
The New York City Council,
The New York City Department of City Planning,
Queens Borough President Melinda Katz,
Local Elected Leaders,
Community Boards 7 and 11
Queens Civic Congress:**

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Signature #1:

Mary Anne Santoramo

Print Name:

MARY ANNE SANTORAMO

Signature #2:

Louise Santoramo

Print Name:

LOUISE SANTORAMO

Address:

Ashtly Ave

Date:

9-15-15

Additional Comments (if any):

PETITION AGAINST NEW ZONING PROPOSAL

**To: Mayor Bill deBlasio,
Council Speaker Melissa Mark-Viverito,
The New York City Council,
The New York City Department of City Planning,
Queens Borough President Melinda Katz,
Local Elected Leaders,
Community Boards 7 and 11
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Signature #1: *Elliott Bentman*

Print Name: ELLIOTT BENTMAN

Signature #2: _____

Print Name: _____

Address: 47-04 188TH ST.

FLUSHING, NY 11358-3809 Date: 9/16/15

Additional Comments (if any): _____

PLEASE DO NOT ENACT THE MAYOR'S PROPOSAL.

I AM AN 81 YR. OLD SENIOR CITIZEN.

PETITION AGAINST NEW ZONING PROPOSAL

**To: Mayor Bill deBlasio,
Council Speaker Melissa Mark-Viverito,
The New York City Council,
The New York City Department of City Planning,
Queens Borough President Melinda Katz,
Local Elected Leaders,
Community Boards 7 and 11
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Signature #1: Theadora Kavanagh

Print Name: THEADORA KAVANAGH

Signature #2: Althea D Kelley

Print Name: ALTHEA D KELLEY

Address: 40 37 157th ST

FLUSHING NY 11354 Date: 9/15/2015

Additional Comments (if any):

PETITION AGAINST NEW ZONING PROPOSAL

**To: Mayor Bill deBlasio,
Council Speaker Melissa Mark-Viverito,
The New York City Council,
The New York City Department of City Planning,
Queens Borough President Melinda Katz,
Local Elected Leaders,
Community Boards 7 and 11
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Signature #1: Martin P. Carey

Print Name: MARTIN P. CAREY

Signature #2: Catherine Carey

Print Name: CATHERINE CAREY

Address: 47 18 1900T.

AUBURNDALE, N.Y. 11358-3831 Date: 9-16-15

Additional Comments (if any):

PETITION AGAINST NEW ZONING PROPOSAL

**To: Mayor Bill deBlasio,
Council Speaker Melissa Mark-Viverito,
The New York City Council,
The New York City Department of City Planning,
Queens Borough President Melinda Katz,
Local Elected Leaders,
Community Boards 7 and 11
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Signature #1:

Roxanne P. Wolf

Print Name:

Roxanne P. Wolf

Signature #2:

John F. Wolf

Print Name:

John F. Wolf

Address:

41-33 170th St.

Auburndale, N.Y 11358-2713

Date:

9/11/15

Additional Comments (if any):

PETITION AGAINST NEW ZONING PROPOSAL

**To: Mayor Bill deBlasio,
Council Speaker Melissa Mark-Viverito,
The New York City Council,
The New York City Department of City Planning,
Queens Borough President Melinda Katz,
Local Elected Leaders,
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Signature #1: Esther Cimitile

Print Name: Esther Cimitile

Signature #2: Anthony Cimitile

Print Name: Anthony Cimitile

Address: 166-17 43 Ave

Flushing, NY 11358 Date: 9/12/15

Additional Comments (if any):

PETITION AGAINST NEW ZONING PROPOSAL

**To: Mayor Bill deBlasio,
Council Speaker Melissa Mark-Viverito,
The New York City Council,
The New York City Department of City Planning,
Queens Borough President Melinda Katz,
Local Elected Leaders,
Community Boards 7 and 11
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Signature #1: Carol De Marco

Print Name: CAROL DEMARCO

Signature #2: Robert DeMarco

Print Name: Robert DeMarco

Address: 48-11 171 St.

Fresh Meadows, N.Y. 11365 Date: 9/10/15

Additional Comments (if any):

PETITION AGAINST NEW ZONING PROPOSAL

**To: Mayor Bill deBlasio,
Council Speaker Melissa Mark-Viverito,
The New York City Council,
The New York City Department of City Planning,
Queens Borough President Melinda Katz,
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Signature #1: Athanasios Pappas

Print Name: Athanasios Pappas

Signature #2: Frideriki Pappas

Print Name: Frideriki Pappas

Address: 49-15 Auburndale Lane

Flushing N.Y. 11358 Date: 9-19-15

Additional Comments (if any):

PETITION AGAINST NEW ZONING PROPOSAL

**To: Mayor Bill deBlasio,
Council Speaker Melissa Mark-Viverito,
The New York City Council,
The New York City Department of City Planning,
Queens Borough President Melinda Katz,
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Signature #1:

Alfred Ziegler

Print Name:

ALFRED ZIEGLER

Signature #2:

Isolde Ziegler

Print Name:

ISOLDE ZIEGLER

Address:

56-27 189 STREET

FRESH MEADOWS NY 11365

Date:

9/9/15

Additional Comments (if any):

PETITION AGAINST NEW ZONING PROPOSAL

**To: Mayor Bill deBlasio,
Council Speaker Melissa Mark-Viverito,
The New York City Council,
The New York City Department of City Planning,
Queens Borough President Melinda Katz,
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Community Boards 7 and 11
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Signature #1: *Alba Pezzina*

Print Name: ALBA PEZZINA

Signature #2: *[Signature]*

Print Name: MARIO PEZZINA

Address: 4622 197 STREET FLUSHING NY 11358

Date: 9/11/15

Additional Comments (if any):

PETITION AGAINST NEW ZONING PROPOSAL

**To: Mayor Bill deBlasio,
Council Speaker Melissa Mark-Viverito,
The New York City Council,
The New York City Department of City Planning,
Queens Borough President Melinda Katz,
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Signature #1: Elizabeth Viscovich

Print Name: ELIZABETH VISCOVICH

Signature #2: Jerry Viscovich

Print Name: JERRY VISCOVICH

Address: 33-17 UTOPIA PKWY

FLUSHING, NY 11358 Date: 09-11-2015

Additional Comments (if any):

PETITION AGAINST NEW ZONING PROPOSAL

**To: Mayor Bill deBlasio,
Council Speaker Melissa Mark-Viverito,
The New York City Council,
The New York City Department of City Planning,
Queens Borough President Melinda Katz,
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Signature #1: John Xidias

Print Name: JOHN XIDIAS

Signature #2: Sophia Xidias

Print Name: SOPHIA XIDIAS

Address: 43-17 189 St.

FLUSHING, NY. 11358 Date: 9/14/15

Additional Comments (if any):

PETITION AGAINST NEW ZONING PROPOSAL

**To: Mayor Bill deBlasio,
Council Speaker Melissa Mark-Viverito,
The New York City Council,
The New York City Department of City Planning,
Queens Borough President Melinda Katz,
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Signature #1:

Barbara DeVito

Print Name:

Barbara DeVito

Signature #2:

Charles Ortolani

Print Name:

CHARLES ORTOLANI

Address:

43-22 168th Street

Flushing NY 11358

Date:

9/14/15

Additional Comments (if any):

PETITION AGAINST NEW ZONING PROPOSAL

**To: Mayor Bill deBlasio,
Council Speaker Melissa Mark-Viverito,
The New York City Council,
The New York City Department of City Planning,
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Signature #1:



Print Name:

ROSANNE SMITH

Signature #2:

Print Name:

Address:

196-44 45 AVE

FLUSHING, NY 11358

Date:

9/11/15

Additional Comments (if any):

PETITION AGAINST NEW ZONING PROPOSAL

**To: Mayor Bill deBlasio,
Council Speaker Melissa Mark-Viverito,
The New York City Council,
The New York City Department of City Planning,
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Signature #1: *Peter J. Holzer*

Print Name: PETER J. HOLZER

Signature #2: *Mary Holzer*

Print Name: MARY HOLZER

Address: W 7-23 167 ST

FROSTING, NY 11355 Date: 9-18-05

Additional Comments (if any):

PETITION AGAINST NEW ZONING PROPOSAL

**To: Mayor Bill deBlasio,
Council Speaker Melissa Mark-Viverito,
The New York City Council,
The New York City Department of City Planning,
Queens Borough President Melinda Katz,
Local Elected Leaders,
Community Boards 7 and 11
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Signature #1: Michael McKiernan

Print Name: MICHAEL MCKIERNAN

Signature #2: _____

Print Name: _____

Address: 58-50 187th STREET

FRESH MEADOWS NY 11365 Date: 9/13/15

Additional Comments (if any):

PETITION AGAINST NEW ZONING PROPOSAL

**To: Mayor Bill deBlasio,
Council Speaker Melissa Mark-Viverito,
The New York City Council,
The New York City Department of City Planning,
Queens Borough President Melinda Katz,
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Signature #1: Susan Nicholas

Print Name: SUSAN NICHOLAS

Signature #2: Helen Nicholas

Print Name: HELEN NICHOLAS

Address: 171-37 COURTNEY AVE

FLUSHING, NY 11358

Date: 9/14/15

Additional Comments (if any):

PETITION AGAINST NEW ZONING PROPOSAL

**To: Mayor Bill deBlasio,
Council Speaker Melissa Mark-Viverito,
The New York City Council,
The New York City Department of City Planning,
Queens Borough President Melinda Katz,
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Signature #1:

Joan Alexander

Print Name:

JOAN ALEXANDER

Signature #2:

Lucy Girard

Print Name:

Lucy Girard

Address:

Joan 43-58 195 St. Flushing 11358

Date:

9/16/15

Additional Comments (if any):

PETITION AGAINST NEW ZONING PROPOSAL

**To: Mayor Bill deBlasio,
Council Speaker Melissa Mark-Viverito,
The New York City Council,
The New York City Department of City Planning,
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Signature #1: Mary T. Sands

Print Name: Mary T. Sands

Signature #2: _____

Print Name: _____

Address: 190-09 35 Ave

Flushing 11358

Date: 9/9/15

Additional Comments (if any): _____

This area has had too many so-called
'improvements' that have hurt our communities —

PETITION AGAINST NEW ZONING PROPOSAL

**To: Mayor Bill deBlasio,
Council Speaker Melissa Mark-Viverito,
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Signature #1: Lorraine Minelli

Print Name: LORRAINE MINELLI

Signature #2: Jesse Minelli

Print Name: Jesse Minelli

Address: 48-12 171 St. Flushing, N.Y. 11365

Date: 9-17-15

Additional Comments (if any):

PETITION AGAINST NEW ZONING PROPOSAL

**To: Mayor Bill deBlasio,
Council Speaker Melissa Mark-Viverito,
The New York City Council,
The New York City Department of City Planning,
Queens Borough President Melinda Katz,
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Signature #1: Henry Gralton

Print Name: HENRY GRALTON

Signature #2: _____

Print Name: _____

Address: 46-37-194 St

Flushing N.Y. 11358 Date: 9/15/15

Additional Comments (if any): _____

PETITION AGAINST NEW ZONING PROPOSAL

**To: Mayor Bill deBlasio,
Council Speaker Melissa Mark-Viverito,
The New York City Council,
The New York City Department of City Planning,
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Community Boards 7 and 11
Queens Civic Congress:**

The undersigned opposes the passing of Mayor deBlasio's proposal "Zoning for Quality and Affordability". Although I/we understand the need for affordable and senior housing in our city, I/we oppose a proposal that will sacrifice many of the gains that have been made through our rezonings over the years that help protect our communities from overdevelopment and inappropriate development. The plan calls for taller and bulkier building construction in certain zoning districts and the reduction or elimination of parking requirements for new senior housing in many areas across the city. Other changes are proposed as well that will negate the progress that we have made. This proposal is going in the opposite direction of what we have fought for in our communities. The public, including concerned individual citizens, community boards, civic associations and other community groups, must be listened to and given an opportunity to contribute input into any proposal that will affect our communities. The Mayor's current proposal should not be enacted.

Signature #1:

Peter H Regan

Print Name:

PETER H REGAN

Signature #2:

Maria Regan

Print Name:

MARIA REGAN

Address:

45-66 196th PLACE

FLUSHING, NY 11358

Date:

9/16/15

Additional Comments (if any):

PETITION AGAINST NEW ZONING PROPOSAL

**To: Mayor Bill deBlasio,
Council Speaker Melissa Mark-Viverito,
The New York City Council,
The New York City Department of City Planning,
Queens Borough President Melinda Katz,
Local Elected Leaders,
Community Boards 7 and 11
Queens Civic Congress:**

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Signature #1:

Judy Norrby

Print Name:

Judy Norrby

Signature #2:

Edward K Norrby

Print Name:

Edward Norrby

Address:

171-01 Courtney Ave

Flushing NY 11358 Date: 9-16-15

Additional Comments (if any):

PETITION AGAINST NEW ZONING PROPOSAL

**To: Mayor Bill deBlasio,
Council Speaker Melissa Mark-Viverito,
The New York City Council,
The New York City Department of City Planning,
Queens Borough President Melinda Katz,
Local Elected Leaders,
Community Boards 7 and 11
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Signature #1: Catherine M. Venis

Print Name: Catherine M. Venis

Signature #2: Stephen Aleksey

Print Name: STEPHEN ALEKSEY

Address: 45-44 167 Street

Flushing, NY 11358

Date: 9/8/15

Additional Comments (if any):

PETITION AGAINST NEW ZONING PROPOSAL

**To: Mayor Bill deBlasio,
Council Speaker Melissa Mark-Viverito,
The New York City Council,
The New York City Department of City Planning,
Queens Borough President Melinda Katz,
Local Elected Leaders,
Community Boards 7 and 11
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Signature #1: Marie Russo

Print Name: MARIE RUSSO

Signature #2: _____

Print Name: _____

Address: 196-12 42 ROAD

FLUSHING NY 11358 Date: 9-10-15

Additional Comments (if any):

PETITION AGAINST NEW ZONING PROPOSAL

**To: Mayor Bill deBlasio,
Council Speaker Melissa Mark-Viverito,
The New York City Council,
The New York City Department of City Planning,
Queens Borough President Melinda Katz,
Local Elected Leaders,
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Signature #1:

Michael Kozak

Print Name:

Michael KOZAK

Signature #2:

Harriet Kozak

Print Name:

HARRIET KOZAK

Address:

171-10 33RD Ave

FLUSHING, N.Y. 11358

Date:

9/11/2015

Additional Comments (if any):

PETITION AGAINST NEW ZONING PROPOSAL

**To: Mayor Bill deBlasio,
Council Speaker Melissa Mark-Viverito,
The New York City Council,
The New York City Department of City Planning,
Queens Borough President Melinda Katz,
Local Elected Leaders,
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Signature #1: Cliff Mosco

Print Name: CLIFF MOSCO

Signature #2: Mary C. Mosco

Print Name: MARY C. MOSCO

Address: 43-59 166 STREET

Flushing NY 11358 Date: 9/9/2015

Additional Comments (if any): _____

PETITION AGAINST NEW ZONING PROPOSAL

**To: Mayor Bill deBlasio,
Council Speaker Melissa Mark-Viverito,
The New York City Council,
The New York City Department of City Planning,
Queens Borough President Melinda Katz,
Local Elected Leaders,
Community Boards 7 and 11
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Signature #1: Theresa Knight

Print Name: Theresa Knight

Signature #2: Thomas E. Knight Jr.

Print Name: Thomas E. Knight Jr.

Address: 190-18 35th Avenue

Auburdale (Flushing) NY 11358 Date: 9-8-15

Additional Comments (if any):

We are concerned, 20+ year residents
& homeowners here in Auburdale.

PETITION AGAINST NEW ZONING PROPOSAL

**To: Mayor Bill deBlasio,
Council Speaker Melissa Mark-Viverito,
The New York City Council,
The New York City Department of City Planning,
Queens Borough President Melinda Katz,
Local Elected Leaders,
Community Boards 7 and 11
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Signature #1: *Doris A Casazza*

Print Name: DORIS A. CASAZZA

Signature #2: *Judith Casazza*

Print Name: JUDITH M CASAZZA

Address: 166-56 21 Ave.

Whitestone NY 11357 Date: 9/17/15

Additional Comments (if any):

PETITION AGAINST NEW ZONING PROPOSAL

**To: Mayor Bill deBlasio,
Council Speaker Melissa Mark-Viverito,
The New York City Council,
The New York City Department of City Planning,
Queens Borough President Melinda Katz,
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Community Boards 7 and 11
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Signature #1:

Patricia Musynske

Print Name:

Patricia Musynske

Signature #2:

Print Name:

Address:

40-11-170 St.

Flushing, N.Y. 11358

Date:

9/18/2015

Additional Comments (if any):

PETITION AGAINST NEW ZONING PROPOSAL

**To: Mayor Bill deBlasio,
Council Speaker Melissa Mark-Viverito,
The New York City Council,
The New York City Department of City Planning,
Queens Borough President Melinda Katz,
Local Elected Leaders,
Community Boards 7 and 11
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Signature #1: *Nancy Strickland*

Print Name: Nancy STRICKLAND

Signature #2: _____

Print Name: _____

Address: 59-46 172 St.

FLUSHING N.Y 11358 Date: 9/14/15

Additional Comments (if any):

PETITION AGAINST NEW ZONING PROPOSAL

**To: Mayor Bill deBlasio,
Council Speaker Melissa Mark-Viverito,
The New York City Council,
The New York City Department of City Planning,
Queens Borough President Melinda Katz,
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Community Boards 7 and 11
Queens Civic Congress:**

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Signature #1: Maria Devoti

Print Name: Maria Devoti

Signature #2: Dennis Devoti

Print Name: DENNIS DEVOTI

Address: 196-08 42nd Ave

Auburndale, N.Y 11358 Date: _____

Additional Comments (if any): All these proposals

are ruining our neighbors. Why don't

you look at the whole picture. No one

looks at the infrastructure. - Sewers,

water pressure, parking for residents. etc.

PETITION AGAINST NEW ZONING PROPOSAL

**To: Mayor Bill deBlasio,
Council Speaker Melissa Mark-Viverito,
The New York City Council,
The New York City Department of City Planning,
Queens Borough President Melinda Katz,
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Signature #1: _____

Shirley M. Farley

Print Name: _____

Shirley M. FARLEY

Signature #2: _____

Print Name: _____

Address: _____

49-22 Francis Lewis Blvd,
or BAY Side, NY 11364
Oakland Gardens, New York

11364

Date: _____

Sept 17, 2015

Additional Comments (if any): _____

PETITION AGAINST NEW ZONING PROPOSAL

**To: Mayor Bill deBlasio,
Council Speaker Melissa Mark-Viverito,
The New York City Council,
The New York City Department of City Planning,
Queens Borough President Melinda Katz,
Local Elected Leaders,
Community Boards 7 and 11
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Signature #1:

Stephen Gavora

Print Name:

STEPHEN GAVORA

Signature #2:

Ada Gavora

Print Name:

ADA GAVORA

Address:

189-11 46TH ROAD

FLUSHING, N.Y. 11358-3420

Date:

9-16-2015

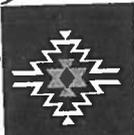
Additional Comments (if any):

PETITION AGAINST NEW ZONING PROPOSAL

**To: Mayor Bill deBlasio,
Council Speaker Melissa Mark-Viverito,
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The New York City Department of City Planning,
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Signature #1: John G. Vigliarolo

Print Name:  John Vigliarolo
19806 47th Ave
Flushing, NY 11358-3914

Signature #2: Donna Battaglia

Print Name: Donna Battaglia

Address: 150-27 84th Ave Whitestone NY 1135

Date: 9/19/15

Additional Comments (if any):

DON'T LET THIS HAPPEN
John

PETITION AGAINST NEW ZONING PROPOSAL

**To: Mayor Bill deBlasio,
Council Speaker Melissa Mark-Viverito,
The New York City Council,
The New York City Department of City Planning,
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Signature #1: Angela Soccoli

Print Name: ANGELA SOCCOLI

Signature #2: _____

Print Name: _____

Address: 40-30 190 St.

FLUSHING NY Date: 9-14-2015

Additional Comments (if any): _____

PETITION AGAINST NEW ZONING PROPOSAL

**To: Mayor Bill deBlasio,
Council Speaker Melissa Mark-Viverito,
The New York City Council,
The New York City Department of City Planning,
Queens Borough President Melinda Katz,
Local Elected Leaders,
Community Boards 7 and 11
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Signature #1:

Gerard J. Matheson

Print Name:

GERARD J. MATHESON

Signature #2:

Joyce H. Matheson

Print Name:

Joyce H. Matheson

Address:

46-65 188 STREET

FLUSHING. NY. 11358

Date:

9-19-15

Additional Comments (if any):

PETITION AGAINST NEW ZONING PROPOSAL

**To: Mayor Bill deBlasio,
Council Speaker Melissa Mark-Viverito,
The New York City Council,
The New York City Department of City Planning,
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Signature #1: Janet Rubiano

Print Name: JANET RUBIANO

Signature #2: Carlos Rubiano

Print Name: Carlos Rubiano

Address: 46-03 196th Place

Queens, N.Y. 11358 Date: Sept. 18, 2015

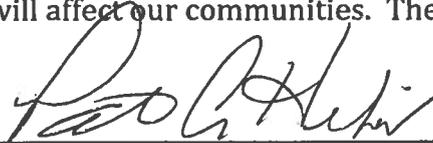
Additional Comments (if any): Increased Commerce in
our neighborhood has resulted in an increase of
tractor-trailer vehicles and noise on our streets.

PETITION AGAINST NEW ZONING PROPOSAL

**To: Mayor Bill deBlasio,
Council Speaker Melissa Mark-Viverito,
The New York City Council,
The New York City Department of City Planning,
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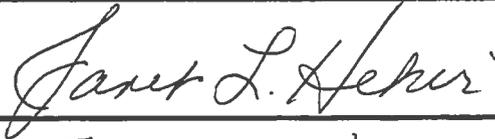
Signature #1:



Print Name:

PATRICK A. HEHIR

Signature #2:



Print Name:

JANET L. HEHIR

Address:

172-09 45TH AVE

FLUSHING NY 11358

Date:

9/19/15

Additional Comments (if any):

PETITION AGAINST NEW ZONING PROPOSAL

**To: Mayor Bill deBlasio,
Council Speaker Melissa Mark-Viverito,
The New York City Council,
The New York City Department of City Planning,
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Signature #1: Thomas Newby

Print Name: Thomas Newby

Signature #2: Margaret Newby

Print Name: MARGARET NEWBY

Address: 196-06 45 Ave

Freshkills Date: 9/18/15

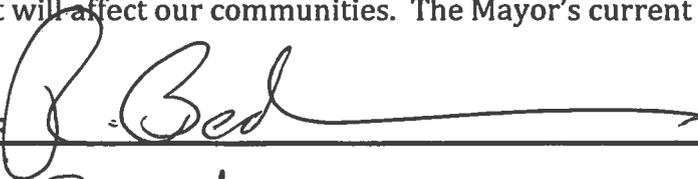
Additional Comments (if any):

PETITION AGAINST NEW ZONING PROPOSAL

**To: Mayor Bill deBlasio,
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The New York City Department of City Planning,
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Signature #1:



Print Name:

R. Bedrossian

46-39 189th St Flushing NY 11358

Signature #2:

Print Name:

Address:

46-39 189th St

Flushing NY

Date:

9/15/15

Additional Comments (if any):

PETITION AGAINST NEW ZONING PROPOSAL

**To: Mayor Bill deBlasio,
Council Speaker Melissa Mark-Viverito,
The New York City Council,
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Signature #1:

Henry Euler

Print Name:

Henry Euler

Signature #2:

Aline Euler

Print Name:

Aline Euler

Address:

204-05 43 Avenue

Bayside, NY 11361

Date: *9-28-15*

Additional Comments (if any):

We have worked too hard for our rezonings to have them tampered with under this proposal. Seniors require adequate parking too!

PETITION AGAINST NEW ZONING PROPOSAL

**To: Mayor Bill deBlasio,
Council Speaker Melissa Mark-Viverito,
The New York City Council,
The New York City Department of City Planning,
Queens Borough President Melinda Katz,
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Community Boards 7 and 11
Queens Civic Congress:**

The undersigned opposes the passing of Mayor deBlasio's proposal "Zoning for Quality and Affordability". Although I/we understand the need for affordable and senior housing in our city, I/we oppose a proposal that will sacrifice many of the gains that have been made through our rezonings over the years that help protect our communities from overdevelopment and inappropriate development. The plan calls for taller and bulkier building construction in certain zoning districts and the reduction or elimination of parking requirements for new senior housing in many areas across the city. Other changes are proposed as well that will negate the progress that we have made. This proposal is going in the opposite direction of what we have fought for in our communities. The public, including concerned individual citizens, community boards, civic associations and other community groups, must be listened to and given an opportunity to contribute input into any proposal that will affect our communities. The Mayor's current proposal should not be enacted.

Signature #1: Mary Keenan

Print Name: MARY KEENAN

Signature #2: Benedict Keenan

Print Name: BENEDICT KEENAN

Address: 42-32 205th STREET

BAYSIDE, NY 11361 Date: 9/25/15

Additional Comments (if any):

PETITION AGAINST NEW ZONING PROPOSAL

**To: Mayor Bill deBlasio,
Council Speaker Melissa Mark-Viverito,
The New York City Council,
The New York City Department of City Planning,
Queens Borough President Melinda Katz,
Local Elected Leaders,
Community Boards 7 and 11
Queens Civic Congress:**

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Signature #1: Lois Shenker

Print Name: Lois Shenker

Signature #2: _____

Print Name: _____

Address: _____ 170-17 29th Ave

_____ Flushing, NY 11358 Date: 9/28/15

Additional Comments (if any): _____

PETITION AGAINST NEW ZONING PROPOSAL

**To: Mayor Bill deBlasio,
Council Speaker Melissa Mark-Viverito,
The New York City Council,
The New York City Department of City Planning,
Queens Borough President Melinda Katz,
Local Elected Leaders,
Community Boards 7 and 11
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Signature #1:



Print Name:

Mrs. Marilyn Lang

Signature #2:

Print Name:

Address:

196-19 42nd Road

Flushing NY 11358

Date:

9/27/15

Additional Comments (if any):

NO MORE OVERBUILDING!

PETITION AGAINST NEW ZONING PROPOSAL

**To: Mayor Bill deBlasio,
Council Speaker Melissa Mark-Viverito,
The New York City Council,
The New York City Department of City Planning,
Queens Borough President Melinda Katz,
Local Elected Leaders,
Community Boards 7 and 11
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Signature #1: Arthur Kramer

Print Name: ARTHUR KRAMER

Signature #2: Linda Kramer

Print Name: Linda Kramer

Address: 35-30 190 St.

Flushing, N.Y. 11358

Date: 9/29/15

Additional Comments (if any):

PETITION AGAINST NEW ZONING PROPOSAL

**To: Mayor Bill deBlasio,
Council Speaker Melissa Mark-Viverito,
The New York City Council,
The New York City Department of City Planning,
Queens Borough President Melinda Katz,
Local Elected Leaders,
Community Boards 7 and 11
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Signature #1: Mary Caldarella

Print Name: MARY CALDARELLA

Signature #2: Orazio Caldarella

Print Name: ORAZIO CALDARELLA

Address: 41-26 171 Street

Flushing, New York Date: 9/27/15

Additional Comments (if any):

PETITION AGAINST NEW ZONING PROPOSAL

**To: Mayor Bill deBlasio,
Council Speaker Melissa Mark-Viverito,
The New York City Council,
The New York City Department of City Planning,
Queens Borough President Melinda Katz,
Local Elected Leaders,
Community Boards 7 and 11
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Signature #1: Charles Tenko

Print Name: CHARLES TENKO

Signature #2: Barbara Tenko

Print Name: Barbara Tenko

Address: 171-41 Courtsey Ave. Flushing

Date: 9/23/15

Additional Comments (if any): We already have more

cars than we can handle: 38 plus houses, 1 job,
gump, cars parked by people using local buses,
dentist doing business on block with two
steady employees plus consistent parking,
1 house has 7 cars, 2 house = 4 cars; 2 house - 3 cars;
Some cars don't use driveway

PETITION AGAINST NEW ZONING PROPOSAL

**To: Mayor Bill deBlasio,
Council Speaker Melissa Mark-Viverito,
The New York City Council,
The New York City Department of City Planning,
Queens Borough President Melinda Katz,
Local Elected Leaders,
Community Boards 7 and 11
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Signature #1:

George Glowacki

Print Name:

George Glowacki

Signature #2:

Print Name:

Address:

48-47 187 ST

Flushing NY 11365-1110 Date: 9-28-15

Additional Comments (if any):

PETITION AGAINST NEW ZONING PROPOSAL

**To: Mayor Bill deBlasio,
Council Speaker Melissa Mark-Viverito,
The New York City Council,
The New York City Department of City Planning,
Queens Borough President Melinda Katz,
Local Elected Leaders,
Community Boards 7 and 11
Queens Civic Congress:**

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Signature #1: Michele Attar

Print Name: Michele Attar

Signature #2: Jack Attar

Print Name: JACK Attar

Address: 42-39 195th ST.

Flushing, N.Y. 11358 Date: 9-29-15

Additional Comments (if any):

PETITION AGAINST NEW ZONING PROPOSAL

**To: Mayor Bill deBlasio,
Council Speaker Melissa Mark-Viverito,
The New York City Council,
The New York City Department of City Planning,
Queens Borough President Melinda Katz,
Local Elected Leaders,
Community Boards 7 and 11
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Signature #1:

Barbara A. Amberg

Print Name:

BARBARA A. AMBERG

Signature #2:

Print Name:

Address:

36-14 165th Street - Apt # 305

FLUSHING, NY 11358

Date:

9/22/2015

Additional Comments (if any):

PETITION AGAINST NEW ZONING PROPOSAL

**To: Mayor Bill deBlasio,
Council Speaker Melissa Mark-Viverito,
The New York City Council,
The New York City Department of City Planning,
Queens Borough President Melinda Katz,
Local Elected Leaders,
Community Boards 7 and 11
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Signature #1: Lenxy Favata

Print Name: LENXY FAVATA

Signature #2: Joan McCosker

Print Name: Joan McCosker

Address: 43-41 170 St. Flushing, NY 11358

Date: 9/23/15

Additional Comments (if any): _____

PETITION AGAINST NEW ZONING PROPOSAL

**To: Mayor Bill deBlasio,
Council Speaker Melissa Mark-Viverito,
The New York City Council,
The New York City Department of City Planning,
Queens Borough President Melinda Katz,
Local Elected Leaders,
Community Boards 7 and 11
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Signature #1: Debra Rossi

Print Name: Debra Rossi

Signature #2: Krystal Andaluz

Print Name: Krystal Andaluz

Address: 173-21 Effington Ave

Flushing NY 11358 Date: 9/25/15

Additional Comments (if any): _____

PETITION AGAINST NEW ZONING PROPOSAL

**To: Mayor Bill deBlasio,
Council Speaker Melissa Mark-Viverito,
The New York City Council,
The New York City Department of City Planning,
Queens Borough President Melinda Katz,
Local Elected Leaders,
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Signature #1:

Peter Milczynski

Print Name:

PETER MILCZYNSKI

Signature #2:

Debra Mlawstas

Print Name:

Debra Mlawstas

Address:

47-49 195 St

FLUSHING NY 11358

Date:

9/17/15

Additional Comments (if any):

PETITION AGAINST NEW ZONING PROPOSAL

**To: Mayor Bill deBlasio,
Council Speaker Melissa Mark-Viverito,
The New York City Council,
The New York City Department of City Planning,
Queens Borough President Melinda Katz,
Local Elected Leaders,
Community Boards 7 and 11
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Signature #1: Grace C. Cosentino

Print Name: Grace C. Cosentino

Signature #2: _____

Print Name: _____

Address: 203-12 27 Ave.

Bayside, NY 11360 Date: 9/18/15

Additional Comments (if any): _____

PETITION AGAINST NEW ZONING PROPOSAL

**To: Mayor Bill deBlasio,
Council Speaker Melissa Mark-Viverito,
The New York City Council,
The New York City Department of City Planning,
Queens Borough President Melinda Katz,
Local Elected Leaders,
Community Boards 7 and 11
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Signature #1:

James McCann

Print Name:

JAMES MCCANN

Signature #2:

Norah McCann

Print Name:

NORAH MCCANN

Address:

36-42 203 ST BAYSIDE

N.Y 11361

Date: 9-22-15

Additional Comments (if any):

ENCLOSED

Dues 2015 & 2016

IT'S A SHAME WHAT THE DEVELOPERS
& BUILDERS ARE DOING TO QUEENS
LOOK AT MAIN STREET. WE DID SHOPPING
THERE AT ONE TIME, NOT ANYMORE.

PETITION AGAINST NEW ZONING PROPOSAL

**To: Mayor Bill deBlasio,
Council Speaker Melissa Mark-Viverito,
The New York City Council,
The New York City Department of City Planning,
Queens Borough President Melinda Katz,
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Signature #1:

Diane Sadallah

Print Name:

Diane Sadallah

Signature #2:

Colette Sadallah

Print Name:

Colette Sadallah

Address:

191-05C 35th Ave

Flushing, NY 11358

Date:

9/20/15

Additional Comments (if any):

PETITION AGAINST NEW ZONING PROPOSAL

**To: Mayor Bill deBlasio,
Council Speaker Melissa Mark-Viverito,
The New York City Council,
The New York City Department of City Planning,
Queens Borough President Melinda Katz,
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Signature #1:

Susan King

Print Name:

Susan King

Signature #2:

Rob King

Print Name:

ROBERT KING

Address:

162-19 Sanford Ave

Flushing NY

Date:

9/15/15

Additional Comments (if any):

PETITION AGAINST NEW ZONING PROPOSAL

**To: Mayor Bill deBlasio,
Council Speaker Melissa Mark-Viverito,
The New York City Council,
The New York City Department of City Planning,
Queens Borough President Melinda Katz,
Local Elected Leaders,
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Signature #1: Stephen De Dalto

Print Name: STEPHEN DE DALTO

Signature #2: [Signature]

Print Name: [Blank]

Address: 42-18 195 ST

FLUSHING NY 11358 Date: 9/15/15

Additional Comments (if any):
[Blank]
[Blank]
[Blank]

PETITION AGAINST NEW ZONING PROPOSAL

**To: Mayor Bill deBlasio,
Council Speaker Melissa Mark-Viverito,
The New York City Council,
The New York City Department of City Planning,
Queens Borough President Melinda Katz,
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Signature #1: Fabiola L. Nadjar Fiore

Print Name: Fabiola L. Nadjar Fiore

Signature #2: _____

Print Name: _____

Address: 195-08 45th Avenue
Flushing, NY 11358 Date: 9/15/15

Additional Comments (if any):

PETITION AGAINST NEW ZONING PROPOSAL

**To: Mayor Bill deBlasio,
Council Speaker Melissa Mark-Viverito,
The New York City Council,
The New York City Department of City Planning,
Queens Borough President Melinda Katz,
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Signature #1:

Harry Lavin

Print Name:

HARRY LAVIN

Signature #2:

Winitred Lavin

Print Name:

WINITRED LAVIN

Address:

53-25 196th St

Flushing Meadows Date: 9-14-15

Additional Comments (if any):

PETITION AGAINST NEW ZONING PROPOSAL

**To: Mayor Bill deBlasio,
Council Speaker Melissa Mark-Viverito,
The New York City Council,
The New York City Department of City Planning,
Queens Borough President Melinda Katz,
Local Elected Leaders,
Community Boards 7 and 11
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Signature #1:

C

Print Name:

Catherine Angelopoulos

Signature #2:

Bessie Giordano

Print Name:

Bessie Giordano

Address:

17035 Pidgeon Mountain Rd

Fresh Meadows, NY 11315 Date: *7/1/15*

Additional Comments (if any):

PETITION AGAINST NEW ZONING PROPOSAL

**To: Mayor Bill deBlasio,
Council Speaker Melissa Mark-Viverito,
The New York City Council,
The New York City Department of City Planning,
Queens Borough President Melinda Katz,
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Signature #1: Laureen M. Eidt

Print Name: Laureen M. Eidt

Signature #2: _____

Print Name: _____

Address: 40-34 196th St.

Flushing, NY 11358 Date: Sept 15, 2015

Additional Comments (if any): _____

PETITION AGAINST NEW ZONING PROPOSAL

**To: Mayor Bill deBlasio,
Council Speaker Melissa Mark-Viverito,
The New York City Council,
The New York City Department of City Planning,
Queens Borough President Melinda Katz,
Local Elected Leaders,
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Signature #1: Edward P. De Nicola

Print Name: EDWARD P. DeNICOLA

Signature #2: Janet De Nicola

Print Name: Janet De Nicola

Address: 189-40 45th AVE

FLUSHING, N.Y. 11358 Date: _____

Additional Comments (if any): _____

PETITION AGAINST NEW ZONING PROPOSAL

**To: Mayor Bill deBlasio,
Council Speaker Melissa Mark-Viverito,
The New York City Council,
The New York City Department of City Planning,
Queens Borough President Melinda Katz,
Local Elected Leaders,
Community Boards 7 and 11
Queens Civic Congress:**

The undersigned opposes the passing of Mayor deBlasio's proposal "Zoning for Quality and Affordability". Although I/we understand the need for affordable and senior housing in our city, I/we oppose a proposal that will sacrifice many of the gains that have been made through our rezonings over the years that help protect our communities from overdevelopment and inappropriate development. The plan calls for taller and bulkier building construction in certain zoning districts and the reduction or elimination of parking requirements for new senior housing in many areas across the city. Other changes are proposed as well that will negate the progress that we have made. This proposal is going in the opposite direction of what we have fought for in our communities. The public, including concerned individual citizens, community boards, civic associations and other community groups, must be listened to and given an opportunity to contribute input into any proposal that will affect our communities. The Mayor's current proposal should not be enacted.

Signature #1:

Joan Jaworski

Print Name:

JOAN JAWORSKI

Signature #2:

Print Name:

Address:

189-10 42 AVE

FRESHING NY 11358

Date:

9/11/15

Additional Comments (if any):

PETITION AGAINST NEW ZONING PROPOSAL

**To: Mayor Bill deBlasio,
Council Speaker Melissa Mark-Viverito,
The New York City Council,
The New York City Department of City Planning,
Queens Borough President Melinda Katz,
Local Elected Leaders,
Community Boards 7 and 11
Queens Civic Congress:**

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Signature #1: Ma. Evelyn O. Degman

Print Name: EVELYN O. DEGMAN

Signature #2: _____

Print Name: _____

Address: 4011 205 STREET

BAYSIDE NY 11361 Date: 9-8-15

Additional Comments (if any): _____

PETITION AGAINST NEW ZONING PROPOSAL

**To: Mayor Bill deBlasio,
Council Speaker Melissa Mark-Viverito,
The New York City Council,
The New York City Department of City Planning,
Queens Borough President Melinda Katz,
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Signature #1: LOUIS J. DeMARTINO Louis J. DeMartino

Print Name: LOUIS J. DeMARTINO

Signature #2: Connie L. DeMartino

Print Name: CONNIE L. DeMARTINO

Address: 43-44 168TH STREET

FLUSHING, NY 11358

Date: 9/8/15

Additional Comments (if any):

PETITION AGAINST NEW ZONING PROPOSAL

**To: Mayor Bill deBlasio,
Council Speaker Melissa Mark-Viverito,
The New York City Council,
The New York City Department of City Planning,
Queens Borough President Melinda Katz,
Local Elected Leaders,
Community Boards 7 and 11
Queens Civic Congress:**

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Signature #1: *Lenore B. Harau*

Print Name: LENORE B. HARAU

Signature #2: _____

Print Name: _____

Address: 50-32-201 ST

DANLAND BRNS NY 11364 Date: 10-20-15

Additional Comments (if any): _____

PETITION AGAINST NEW ZONING PROPOSAL

**To: Mayor Bill deBlasio,
Council Speaker Melissa Mark-Viverito,
The New York City Council,
The New York City Department of City Planning,
Queens Borough President Melinda Katz,
Local Elected Leaders,
Community Boards 7 and 11
Queens Civic Congress:**

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Signature #1: Amy C. Burns

Print Name: Amy C. Burns

Signature #2: George J. Burns

Print Name: George J. Burns

Address: 45-49 Utopia Parkway

(Auburndale) Flushing NY 11358 Date: 9/20/15

Additional Comments (if any):

PETITION AGAINST NEW ZONING PROPOSAL

**To: Mayor Bill deBlasio,
Council Speaker Melissa Mark-Viverito,
The New York City Council,
The New York City Department of City Planning,
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Signature #1: Louis J. Troisi

Print Name: LOUIS J. TROISI

Signature #2: _____

Print Name: _____

Address: 47-41 166 ST.

Freshing 11.3.58 Date: _____

Additional Comments (if any):

AUBURNDALE IMPROVEMENT
ASSOCIATION, INC.
P.O. BOX 580331, STATION A
FLUSHING, NY 11358-0331

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Destination: 10007
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NEW YORK CITY DEPARTMENT
CITY PLANNING
COMM. CARL WEISBROD, CHY
22 READE STREET
NEW YORK, NY 10000

**New York City Planning Commission
Public Hearing on Mandatory Inclusionary Housing and
Zoning For Quality and Affordability
December 16, 2015**

Testimony of Colvin W. Grannum

Good morning Commissioners. My name is Colvin W. Grannum. I serve as President and Chief Executive Officer of Bedford Stuyvesant Restoration Corporation which is recognized as the nation's first community development corporation (CDC). Restoration is a comprehensive CDC providing a range of services including arts and culture, job training and placement, affordable housing, commercial real estate, and energy conservation. As a housing developer, Restoration has participated in the development of more than 2500 units of housing including low - income rental and moderate - income homeownership. Over the past decade we have deepened our focus on human capital and promoting upward mobility for low- and moderate-income households by adopting evidence-based program involving financial coaching, job training and placement and income supports for workers.

I commend Mayor DiBlasio and his administration for proposing a Mandatory Inclusionary Housing (MIH) initiative that seeks to promote social and economic equity for low- and moderate-income New Yorkers through economic integration. Achieving economic diversity in neighborhoods across the City is a key factor in whether all New Yorkers have a realistic opportunity for upward mobility.

I also commend the DiBlasio administration for the quality of the demographic and real estate finance data developed in connection with the MIH proposal. The data describes the state of the City's housing market including recent and projected trends related to migration and displacement, the degree of economic diversity within neighborhoods, and the financial feasibility of adding affordable housing units to market rate projects.

"Regret" is the theme underlying this testimony. It is unfortunate that MIH was not an element of the rezonings of Bedford Stuyvesant which occurred within the last eight years. Hundreds of units of housing have been developed since then virtually all market rate. MIH would most likely have generated significantly more units of housing for low and moderate income residents than the number that has been developed and is in the current and projected pipelines.

Housing and education integration, (both economic and racial integration) are among the most sensitive (and perhaps volatile) issues in the nation and city, but they also hold the key to unlocking equity and reversing discrimination. MIH is an effective tool for advancing both objectives. In this regard, two points should be emphasized:

1. We need to create a truly mixed income City. The City of New York has a responsibility to undo the public and private sector policies and practices that have led to high levels of economic and racial segregation in housing and public education.

2. Public sector intervention in the housing market needs to happen quickly because market forces are already ahead of policy and accelerating at a rapid pace. Urgent action is required.

In my personal and professional lives, I am familiar with the northern and central Brooklyn communities of Fort Greene, Clinton Hill, Bedford Stuyvesant and Crown Heights. It's where I was born, grew up, and have worked for the past 20 years. Massive amounts of private and global investment are flooding these communities as measured by the high volume of transactions and the rapid growth in real estate sales prices and market rents. Barely a week goes by without some mention in the New York Times and other publications of the extraordinary rise of the real estate market in these communities. The pace of change is alarmingly rapid.

Along with lower income families, households with incomes from \$40k-\$90k are being shut out of the housing market. Even at \$2300 per month, a two bedroom apartment is difficult to find. Studio apartments are renting for at least \$1300. MIH would likely make a difference for these households.

Restoration is customizing a significant portion of its work by census tract. What is increasingly apparent is that economic segregation and income polarization is growing in communities like Fort Greene, Clinton Hill, Bedford Stuyvesant and Crown Heights particularly when examined at the census tract level. This because low and moderate income residents are being displaced from the low density, brownstone housing stock and the vast majority of new units are aimed at upper

income residents. Low and moderate income residents continue to live in large numbers in the northern portions of these communities and other places where public housing and other publicly financed housing were concentrated decades ago. In fact, surveys we have conducted indicate that overcrowding is increasing in public housing.

The individual and societal costs of economic segregation are staggeringly high and difficult to reverse. The individual costs include human suffering as evidenced by high levels of frustration and anxiety among residents due to poor educational opportunities and outcomes, high poverty, high unemployment and low wages across generations. Societal costs are high as measured by public expenditures for:

- Mass incarceration, probation and parole;
- Policing;
- Public assistance to supplement unemployment and low wages;
- Homelessness;
- Mental health care for conditions such as anxiety, and drug and alcohol dependency; and
- Disproportionately high health care costs due to health disparities generated by environmental factors associated with high poverty census tracts.

In sum, going forward our city must transform high poverty census tracts into places where residents thrive. Simultaneously, we must create options for low and moderate income residents to live in low poverty census tracts where strong

schools, jobs opportunities and social capital support upward mobility. This is the basic formula for creating equity through upward mobility. The City should intervene as promptly as possible to shape the housing market. Failure to do, places the City in the position of not having sufficient say concerning the future composition of the City for decades to come – who will live here and where.

Lastly, I express support for the Administration's proposed Zoning for Quality and Affordability (ZQA) amendment and incorporate, by reference, the statements of the Association of Neighborhood and Housing Development, Inc. and my peer nonprofit community development practitioners who will testify at this hearing.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Colvin W. Grannum", written in a cursive style. The signature is positioned above a horizontal line.

Colvin W. Grannum

Zoning for Quality and Affordability/Mandatory Inclusionary Zoning - Opposition

My name is Jean Standish, and I represent the Bowery Alliance of Neighbors.

The 'Zoning for Quality and Affordability' and 'Mandatory Inclusionary Housing' initiatives would unnecessarily weaken neighborhood zoning protections and significantly increase height limits for new developments with little or no public benefit. What it will do is increase out-of-scale construction in residential neighborhoods, and eliminate hard-fought-for height limits which were often delicate compromises that took years to craft and achieve. Linking MIH to large-scale increases in the allowable amount of market-rate development would undermine the supposed goal of increasing affordability, to say nothing of maintaining neighborhood character and livable communities.

Inclusionary zoning does not deal with the critical lack of affordable housing in New York City. Thousands of affordable apartments are needed to mitigate this crisis. Inclusionary zoning will not be able to fulfill this demand since only a small percentage of affordable units (20 - 30 percent) will be included in the market rate apartment buildings being proposed in this plan. It would take thousands of these upzoned market-rate buildings to fulfill the enormous demand for affordable housing in this city

If all the issues regarding inclusionary zoning aren't thoroughly explored, it will have a negative effect on our communities--mainly that of secondary displacement. The majority of apartments in these buildings will be market rate, and this will certainly have an effect on the real estate values and demographics in our neighborhoods. A considerable influx of market-rate tenants and large buildings will most certainly affect the character of our communities, displacing middle- and low-income residents and small businesses. Low-rise buildings would become soft sites and would be vulnerable to tear downs.

To conclude, 'Zoning for Quality and Affordability' is a gift to the real estate developers, pure and simple.

DCP has promised that there would be protections in place from landlord harassment and evictions. Thus far, the city has done little to protect tenants from avaricious landlords in the wake of escalating rents in our city.

I urge you to reevaluate the 'Zoning for Quality and Affordability' and 'Mandatory Inclusionary Housing' Initiatives.

Jean Standish
308 East 6th Street
New York, NY 10003



Hearing on Amendments for Mandatory Inclusionary Housing (MIH) and Zoning for Quality and Affordability (ZQA)

**Testimony Of
Breaking Ground
For The City Planning Commission**

December 16, 2015

Hello, my name is Brenda Rosen. I am the President and CEO of Breaking Ground, New York City's largest supportive housing developer and provider to low income and chronically homeless New Yorkers. We currently operate 3,300 units of permanent and transitional housing – the majority of which are located in Manhattan, Brooklyn, the Bronx and Queens -- and we have a development pipeline of 1,000 more units over the next five years. We serve individuals and families who are homeless or at risk of becoming homeless. Over the last 25 years, we have helped 12,000 people escape homelessness, including veterans, seniors, artists, youth aging out of foster care, those living with addiction and chronic illnesses, and many more.

- For the chronically homeless, we create safe, secure housing, with essential on-site support services to help them address the psychosocial, mental, and physical health problems that are obstacles to independent living.
- For individuals who find themselves at the edge of homelessness, our affordable housing provides an all-important safety net. On average, the minimum qualifying income for these individuals is \$18,000 a year.
- 99% of our residents remain stably housed; less than 1% of our residents leave us each year because of some unresolvable behavior or financial issue.

We also manage the street outreach program, Street to Home, in Brooklyn, Queens and nearly one third Manhattan, which connects the most entrenched, long-term homeless individuals with housing and other critical supportive services.

As we are all aware, New York City is facing a housing affordability crisis. Last year, more than one-third of NYC renters paid more than half of their income towards rent. On any given night this year, nearly 65,000 people in NYC were sleeping in shelters.

It is critical that we significantly increase NYC's affordable housing stock.

The requirements set out in Mandatory Inclusionary Housing (MIH), combined with public subsidies, are our most viable option to expand the pool of affordable housing for everyone, and especially for New Yorkers most in need.

- MIH will require that all developers set aside 25 to 30% of the housing they build as affordable apartments. Those homes will be permanently affordable through continuing cross-subsidy from the market rate housing with which they are paired.
- Requiring private developers to build affordable units will free up public dollars to target housing to those who need the most help – very low-income and extremely low income New Yorkers. As a result, developers like Breaking Ground will be able to create and operate more housing throughout NYC.

Alongside MIH, Zoning for Quality and Affordability (ZQA) will provide more flexibility to accommodate the diverse housing needs of a growing senior population.

- Developers of senior- and affordable housing near transit would be able to assess whether providing costly parking facilities are necessary for projects.
- The increased density for senior housing that would be permitted by ZQA would help bring online much-needed more affordable homes for our growing senior population, many of whom cannot afford rents above 30% - 40% of AMI.
- We own and operate the Domenech, a HUD funded 72-unit affordable senior housing building in Brownsville, Brooklyn. As required, the building includes a very costly on-site parking lot that is significantly underutilized – the lot accommodates 15 spots, and only 3 residents have cars. With ZQA's allowance for no on-site parking and greater density for senior housing, we would have been able to create an additional 30 units of affordable housing at the Domenech for low-income seniors from the community.

ZQA would also encourage street level retail and accessory community facility uses in affordable housing, creating a more dynamic streetscape.

- Many of Breaking Ground's supportive housing buildings have storefronts with community-serving retail or accessory community facility uses. For example, our Schermerhorn building in downtown Brooklyn has 217 units of supportive housing and is home to the community's Brooklyn Ballet, which has a storefront space on the ground floor. Another one of our buildings located in Manhattan, The Prince George, contains 416 units of supportive housing and operates the historic Prince George Ballroom, an event venue used by private companies and community organizations alike. 100% of rental proceeds benefit Breaking Ground's housing and outreach programs for homeless and other vulnerable New Yorkers.
- Our experience is that communities want mixed-use buildings. ZQA would encourage and make it easier for developers to incorporate storefront space for retail or community facility use into affordable housing projects.

On behalf of Breaking Ground, thank you for this opportunity to testify. We greatly support these policies to create more affordable and supportive housing in New York City to serve our most vulnerable populations. Your interest and deep commitment to this timely and critical issue is greatly appreciated.

Respectfully submitted by:
 Brenda E. Rosen, President and CEO
 505 8th Avenue – 5th Floor
 New York, NY 10018
 (212) 389-9322 x9356
 brosen@breakingground.org

Comments of Suwen Cheong

I am a resident of Prospect Lefferts Gardens in Brooklyn, community District 9. I am a member of Concerned Citizens For Community Based Planning, a grassroots organization that was formed because a legacy of unfair zoning and poor planning has left our essentially low rise, historic neighborhood open to destructive real estate speculation, out of scale buildings that do violence to the character of our neighborhood, undue concentrations of population, congestion, and the demolition of perfectly sound, moderately priced housing in favor of luxury condos.

Our neighborhood is already one of the densest in Brooklyn with 60,536 residents per square mile (2010), and is set to become even more dense for decades to come. Unlike Park Slope, we do not expect a significant reduction in population through gentrification. Ninety percent of our housing units consist of rent stabilized apartments, rather than townhouses. At this point, greater density of either buildings or population is a burden, not a benefit, to the public.

In view of community goals to preserve neighborhood character and quality of life by limiting height and further density, and in view of the repeated failures of city planning to implement zoning to protect our neighborhood at the request of our community board since 2008, we cannot support legislation such as the Zoning for Quality and Affordability and Mandatory Inclusionary Housing Amendments that would move in the opposite direction of what we seek by approving broad increases in height and density.

My neighbors do not want violent change. What does that mean? Our streetscapes are sometimes uniform and sometimes varied between 3 and 6 stories tall. Allowing and incentivizing buildings double the height of nearby buildings is felt as a violent change, so is the quite literal violence of demolition and construction adjacent to one hundred year old buildings. Change used to mean a homeowner adding an extension to the back of their house to accommodate a growing family, or a landlord adding one floor to a commercial building when the business was successful enough to warrant expansion. We are furious about the changes we are seeing today – 20 story publicly subsidized mostly luxury towers next to 2 story houses, and block wide 8 story buildings that sit vacant for years while nearby rent stabilized buildings are emptied with alarming speed. We are also concerned by a trend of violent confrontations over parking spaces as our last remaining parking lots and garages are replaced by residential buildings that make no contribution to affordability, aesthetics, or property taxes. We believe we have the right to remain a stable neighborhood, with progress defined as each generation doing better than the last in access to good jobs and educational opportunities.

We believe a policy of increasing market rate density to subsidize a small number of income linked units is not appropriate in our neighborhood, given community goals to curb overdevelopment and speculation and preserve our large stock of existing rent stabilized housing. We are deeply concerned that given the existing need for rightzoning, a higher density mandatory inclusionary zone would contribute to the destruction of neighborhood character and existing affordable housing, and cause secondary displacement of lower income residents. Instead we seek to preserve our existing affordable housing and create new affordable housing on a site specific basis, where appropriate.

In Community District 9, in the last five years we have built several hundred units of housing that is affordable to our residents (whose median income is around \$40,000 per household). This was done without inclusionary zoning or out of scale construction. A local non-profit, CAMBA, is building approximately 500 units of housing on the site of an existing 7 story Kings County hospital building. We support our community board in seeking more similar opportunities.

Broadway Community Alliance

December 16, 2015

My name is Laura Spalter. I am speaking on behalf of the Broadway Community Alliance, a North Riverdale civic group opposed to the Mayor's Rezoning Plan. Mayor de Blasio's one-size-fits-all plan will undo years of deliberate and thoughtful community planning that resulted in Community Board 8's 197-a Plan, adopted by the City Planning Commission and City Council in 2003. That plan resulted in a series of zoning actions to "preserve the scale and character of area neighborhoods"

Under current zoning, developers of affordable and senior housing can already build taller, denser buildings with fewer required parking spaces, often to the frustration of their neighbors as they search for parking. Thousands of affordable units will continue to be built without this ill-conceived proposal that serves to benefit the real estate interests at the expense of our unique neighborhoods.

Buried in the proposal's 1,000 pages is the loophole that allows developers to apply to the Board of Standards and Appeals for "hardship" waivers to avoid **every** mandate in MIH, including the number and size of affordable units and affordability levels. Also, the current BSA requirement for developers to show why their projects will not alter the community character has been grievously eliminated. Another troubling text change undermines our ULRP process by granting to the City Planning Commission the power to authorize large scale apartment buildings known as CCRC's in R1 and R2 residential districts zoned for single family homes. The plan falsely touts that it will create **permanently** affordable units. But for the multitude of developers who participate in the state's 421a program, those affordable units will begin phasing out in twenty-five years.

The public has the right to transparency and a cost analysis of the Mayor's Rezoning Plan. How will the city pay for it? What are the costs for promised new infrastructure, schools, transportation, etc? There is no free lunch. Inevitably, the needed revenue will come from raising our property, sewer and water taxes, along with every other tax that we pay.

Ironically, Mayor de Blasio has succeeded in uniting this city—against him. Community Boards and Borough Boards have overwhelmingly voted to reject this plan. Clearly, they understand the deleterious impacts caused by Transit Zones, increased density, and unbridled growth of community facilities and luxury high-rise development—serious consequences for a questionable net gain of "affordable" units.

Laura Spalter

Co-chair, Broadway Community Alliance
5480 Mosholu Avenue
Bronx, NY 10471

www.BroadwayCommunityAlliance.com
bwayalliance@gmail.com



Testimony by Meredith Marshall, Managing Partner of BRP Companies
NYC City Planning Commission
Public Hearing on Zoning for Quality and Affordability
120 Broadway, New York, NY
December 16, 2015

My name is Meredith Marshall, and I am the managing partner of BRP Companies, a New York-based firm at the forefront of developing affordable, mixed-income and market-rate housing and commercial developments. Thank you for this opportunity to testify today in support of the proposed Zoning for Quality and Affordability and mandatory inclusionary housing text amendments.

Since our beginning in 1998, BRP has developed over 600,000 square feet of real estate projects, and we have over three million square feet currently in development. My firm is currently working on new construction projects in Central Harlem, Bedford Stuyvesant, East New York, Jamaica Queens and the South Bronx. We support the de Blasio administration's ongoing efforts to increase the production of affordable housing for low- and middle-income New Yorkers, and we hope to contribute to that effort in every way possible.

We are fully supportive of ZQA because we believe it will allow us to build more affordable and senior housing throughout New York City, as well as helping us to build better quality buildings that serve the needs of each community.

Our company has faced numerous cases in which current zoning rules proved to be outdated. These rules include restrictions that promote development on standard, rectangular lots, but obstruct development on irregularly shaped lots that are increasingly common throughout the city. The frequent result is unused floor area that could have otherwise been devoted to building new affordable units. Additionally, these outdated rules can make it impossible to include the spacious entryways, courtyards and quality ground-floor retail options that make both affordable and market-rate buildings more desirable to residents.

ZQA would solve those problems by providing much-needed updates to building envelope requirements. These updates will allow us to maximize the number of affordable units within the permitted floor area, as well as enabling us to design buildings that provide more desirable apartments and retail options that serve residents and improve the surrounding neighborhood.

Another problem we have faced is the requirement for new parking lots alongside many affordable and senior housing developments. New parking lots can cost as much as \$60,000 per space, taking away vital resources that could otherwise be used to build new affordable units, improve building design or provide new open space for residents. This requirement can even prevent a new development from ever being built.

ZQA acknowledges that so many of these parking lots are severely underutilized, and it would eliminate parking requirements in areas that are already served by public transit. This reduction of unnecessary requirements will make it easier and more financially feasible for us to build affordable and senior housing throughout New York City. It is also important to note that ZQA will allow developers to turn some existing underutilized parking lots into new affordable and senior housing. For example, in Bedford Stuyvesant we were required to construct 20 parking spaces in a new development (The Garvey on Fulton Street) which is 100% low income and located near great transportation. The parking lot is empty although it cost us over \$ 1 million dollars to build.

Simply put, ZQA will enable our firm to more quickly and easily develop affordable and senior housing for low- and middle-income New Yorkers, and it will enable us to design those buildings in ways that better serve the populations in need.

In addition to supporting ZQA, we also support efforts that harness market-rate development in order to increase the production of affordable housing. We believe these efforts will be accomplished through the de Blasio administration's Mandatory Inclusionary Housing proposal, which we support. We look forward to seeing more specific details about MIH as this process continues.

Thank you again for this opportunity to testify in support of ZQA and MIH and the creation of more affordable and senior housing and better buildings across New York City.

Capalino+Company

Government & Community Relations Strategists

TESTIMONY

CITY PLANNING COMMISSION

DECEMBER 16, 2015

Claire H. Altman

Director of Affordable and Supportive Housing Services Development

Capalino+Company

Good morning, Mr. Chair and members of the Commission. I am focusing my statement today on the text changes in the Zoning for Quality and Affordability proposal that affect the range of senior housing options. I serve as the Director of Affordable and Supportive Housing Development at Capalino+Company where our group assists not-for-profit and for-profit housing organizations in developing affordable housing... As a not-for-profit affordable housing developer and manager for 30+ years and before that a pioneer in the field of accessible transportation for the elderly and disabled, I have firsthand experience in how important it is to reduce regulatory barriers to creating affordable, accessible, high quality housing for NYC's large and growing senior population.

City Planning's proposals have some key features that, taken together, will greatly reduce the red tape and provide incentives for housing developers who want to build affordable senior housing. Some of the most important of these "reforms" are:

- Creating a zoning definition of "affordable independent residence for seniors" to allow a wider range of not for profit and for profit organizations to provide affordable senior housing
- Redefining "shared" facilities within senior housing complexes
- Creating a new term "long term care facility" to apply to assisted living residences and nursing homes and continuing care retirement communities
- Permitting long term care facilities in R3-R10 districts as of right
- Increasing the FAR (floor area ratio) for affordable independent and long term care residences for seniors by 20% over what is currently permitted for other residences

Capalino+Company

Government & Community Relations Strategists

Reducing restrictions on mixing affordable independent residences for seniors with other community facility uses on the same zoning lot

- Reducing minimum unit sizes to less than 400 square feet, and finally
- Reducing parking requirements for newly developed senior housing and for existing senior housing.

When taken in their entirety, these individual changes reduce barriers and add incentives for developing much needed senior housing and care facilities in New York City.

These proposed Zoning for Quality and Affordability represents a coordinated set of text amendments that would help developers, both for profit and not-for-profit, achieve the goal of creating a sufficient supply of safe, affordable, attractive senior housing and care facilities. For too long, NYC's housing and zoning regulations have inhibited the development of more creative solutions as we see in Scandinavia and Europe where shared housing models especially for seniors are becoming the norm. In addition, new models have emerged that foster inter-generational housing that supports both families with young children and seniors. We need for our zoning regulations to mirror the way people want to live, not to have artificial barriers to people living in communities that foster independence, but provide for supports when people need them.

The current set of regulations and zoning rules foster building settings in which we move seniors to different environments as their needs change – which is disruptive and isolating and as a result creates more dependence than is necessary. With these new proposals, we have an opportunity to replace some of the heavy reliance on facility based services with housing settings that foster human support networks which help people live as independently as possible.

ZQA and MIH represent landmark reforms in the zoning texts that will greatly reduce barriers to and increase incentives for developing senior housing and care facilities that fit the 21st century needs of seniors. Many seniors are living well longer and want to live in affordable urban settings because of the many services and amenities available... The proposed ZQA text changes are also important to younger New Yorkers as it is also critically important to the families of seniors who want their parents and grandparents to be close to them.

I urge support of these very common sense proposals that will go a considerable distance in

Capalino+Company

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facilitating the development of the full spectrum of senior housing across New York City – we owe it to New Yorkers to take these important steps to making NYC a more livable city for seniors and by extension to all New Yorkers.

CATHOLIC COMMUNITY RELATIONS COUNCIL

**Testimony Before the New York City Planning Commission
Zoning Resolution Amendment
to Support the Creation of New Affordable Housing (N160049ZRY)
Joseph Rosenberg, Executive Director of the Catholic Community Relations Council
December 16, 2015**

Good morning Chairman Weisbrod and Members of the New York City Planning Commission. I am Joseph Rosenberg, Director of the Catholic Community Relations Council (“CCRC”) representing the Archdiocese of New York and the Diocese of Brooklyn on legislative and policy matters in New York City. I am pleased to express our support of the Mayor’s Housing Plan and several of the specific zoning proposals that are before you today.

We can all agree that our City is in desperate need of affordable housing. This crisis is evident in the financial burdens that threaten the displacement of families from their apartments. It is vivid in the plight of the homeless in shelters and on our streets. The means to help confront and address many of these challenges are contained in the Mayor’s Housing Plan and the proposals that are the subject of today’s hearing.

Providing assistance to the poorest and most vulnerable New Yorkers has long been a priority of the Catholic Church in New York City. Consistent with that mission is the continuing focus on preserving and developing affordable housing. Over the last several decades the Archdiocese of New York and the Diocese of Brooklyn through Catholic Charities, parishes and community based affiliates have maintained and constructed thousands of housing units for the working poor, the elderly, the homeless and people with special needs. The Catholic Church in our City continues to focus on its long standing mission of administering to the poor and the needy. As a result, it is one of the largest providers of low income senior citizen housing in New York.

The need to produce and preserve low income housing for the elderly is understood by all. The senior population of our City is growing and this vulnerable population especially faces the stress and challenges of remaining home in their apartments or finding alternative affordable units. In the Diocese of Brooklyn and Queens 2,300 units of low income housing for the elderly are owned and operated by Progress of Peoples (“POP”), an affiliate of Catholic Charities. They have a waiting list that exceeds 16,000 individuals. The Institute of Human Development (“IHD”) of Catholic Charities of the Archdiocese of New York also owns and operates hundreds of low income senior citizen units throughout Manhattan, Staten Island and the Bronx.

Our City today bears little resemblance to the New York of years past where large swaths of vacant public and privately owned land was available for the development of affordable housing. Accordingly, new methods need to be created to meet the challenges facing us. The Zoning for Quality and Affordability (“ZQA”) proposal before you contains several of these that are especially geared to assist low income seniors.

Parking in many developments is expensive to construct and often not needed. Such is the case where the proposed building is located close to public transportation. Even more significantly, space and financing spent on parking facilities in neighborhoods and residential developments where car ownership is very low reduces the ability of the property owner to maximize existing space to provide additional affordable housing units. The ZQA would provide that no parking be required for the new construction of senior and affordable housing that is within ½ mile of a subway station. This would go far in spurring the construction of housing, especially for the elderly.

Another significant provision in the ZQA would also permit the owners of existing low income senior housing to eliminate parking as of right, and allows owners of existing affordable housing to do the same through the Board of Standards and Appeals (“BSA”) process. Freeing up unused vacant land adjacent to existing developments to help facilitate the production of affordable housing, especially for seniors, benefits us all.

Creating affordable apartments for families and the elderly, and not parking spaces for unneeded cars is the focus of important provisions of the ZQA. That is why these proposals are strongly endorsed by the Catholic Church.

The ZQA also provides design flexibility that would have an impact on the construction of affordable housing. It would allow the construction of community facilities on the ground floor to cover an entire lot without rear yard setbacks. Without this proposed modification, in many instances, the community facility would have to encompass two floors of the development thereby reducing the number of housing units that can be built on site. Although a subtle provision, it is one that will help to generate additional affordable housing.

The ZQA proposes corrective measures for housing development on sites that are irregular in shape and size. Current zoning often assumes a typical New York City lot with a depth of 100 feet. In cases of smaller, irregular lots, new housing can be stymied due to this requirement. New rules in the ZQA will encourage development on these types of lots by reducing the distances between new and existing buildings on a single lot. The overall effect would be to create new affordable housing on sites that would otherwise be difficult to develop.

These are just several creative examples contained in the amendments before you that would address the need to produce affordable housing. They all have our strong support.

Thank you



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**Testimony of Jonathan Bowles
Executive Director, Center for an Urban Future**

**Before the NYC Planning Commission
Mandatory Inclusionary Housing (MIH) + Zoning for Quality and Affordability (ZQA)
December 16, 2015**

Good afternoon. Chairman Weisbrod and members of the Commission, thank you for the opportunity to speak here today.

My name is Jonathan Bowles and I am the executive director of the Center for an Urban Future, an independent think tank that shines a light on the critical challenges and opportunities facing New York.

I don't consider myself a housing expert.

We focus on growing New York's economy and expanding economic opportunity.

But it's abundantly clear to me that the shortage of affordable housing is one of the biggest threats to the city's continued economic growth ... one of the biggest barriers to elevating low-income New Yorkers to the ranks of the middle class ... and one of the most serious challenges facing the city's rapidly growing population of older adults.

To begin with, so many of the fastest growing sectors of the city's economy – from the startup tech sector to creative fields like film and advertising – will find it exceedingly difficult to sustain their growth if the city fails to build more moderately-priced workforce housing.

Perhaps even importantly, without a lot more affordable housing, the hundreds of thousands of New Yorkers who are working in low wage jobs will find it impossible to achieve economic mobility.

As it is, around 400,000 New Yorkers—1 in 10 working adults—have jobs that pay too little to rise above the poverty line. Sadly, this is likely to continue. Indeed, last week, the U.S. Bureau of Labor Statistics published its updated projections of occupations that will add the most jobs over the next decade. According to their analysis, of the 15 occupations expected to add the most jobs in the next decade, 11 have median annual wages under \$32,000 a year. And eight of those occupations pay under \$26,000 a year.

Given that simply having a job is no longer enough to ensure a decent life in New York, we need to be taking steps to make the city more affordable. We need more housing that working poor New Yorkers can afford.

Finally, without more affordable senior housing, we're likely to see a lot more older adults slide into poverty. Already, 24 percent of the city's immigrant seniors and 15 percent of the city's native born seniors are living in poverty. But the number of older adults—and especially older immigrants, which account for 46 percent of all seniors in the city—is expected to grow significantly in the decades ahead. To plan for this growth, New York needs quite a bit more affordable senior housing.

The city's proposed zoning text amendments—Mandatory Inclusionary Housing, and Zoning for Quality and Affordability—aren't perfect. But they are worth supporting because they would make it significantly easier to develop the affordable housing that's so needed in New York today.

I urge you to support these two zoning text amendments.

Criterion Group is a real estate development company that has designed and constructed 4 market rate buildings within Community Board 1:

- 11-15 Broadway, Astoria, NY 11106
- 12-15 Broadway, Astoria, NY 11106
- 30-50 21st Street, Astoria, NY 11102
- 26-38 21st Street, Astoria, NY 11102

All of these projects were impacted by the existing, outdated zoning which ZQA seeks to change. For example, we could not utilize all of the available FAR and due to height and envelope limitations, we were forced to provide apartments at the street level with no offset from street wall and/or lot line.

The ZQA explains that there are problems created by not setting back the building and elevating the ground floor units above the sidewalk, producing substandard ground floors and flat dull buildings. We experienced these problems with the aforementioned buildings:

- Since the apartment were built along the lot lines at the ground level, any pedestrian passerby can see into or access the ground level apartment.
- To maintain privacy, tenants would install blinds and shades, causing a loss of natural lighting, which is a part of the window light and air requirements in the zoning codes.
- Fresh air and noise mitigation is limited at the ground level
- There is an increased risk for the ground level due to weather, particularly flooding, whether it be from a natural waterway or a broken water main and/or sewage line.
- With the increase use of P-TAC units to provide heating and cooling, the risk of a water from floods and snow melt will flow unrestricted through the P-TAC Unit into the apartment.

Naturally, these issues are a cause for concern. We are designing a new development at 30-77 Vernon Blvd, Astoria, NY 11102, which will also face these issues without the approval of ZQA. This development, an optional 80/20 affordable inclusionary housing project, has a total of (711) units within the development, with (142) of those units as Inclusionary-Housing. Under the current height and envelope limitations imposed on the project, we are unable to wholly fit the "As of Right" Market Rate Floor Area and ceiling height will be limited. Therefore, we cannot even consider providing the 20% inclusionary-Housing Units.

The QZA would provide many benefits, such as:

- Greater flexibility in design: interesting setbacks can be utilized in the design, since we would not be required to build the entire face of the building to the lot line in order to maximize the entirety of the available "As of Right" Market Rate Floor Area.
- Increased height will allow sensible ceiling heights:

- For example, when you consider a typical floor height of 8'-8" required to maximize the Market Rate Floor Area, it does not provide much head clearance when construction is completed.
 - A minimum slab thickness of 10" is required to comply with ADA requirements due to a required recess for the shower pit for a wheelchair to roll into the shower.
 - Once you add flooring (*approx. 1.5" to 2" depending on the product and underlayment*), HVAC ventilation (*approximately 8" with minimum clearance*), lighting, wiring, gypsum construction with sound/fire proofing on the ceiling. The total unrealized space used is approximately 22" – 24". This reduces the unit's finished ceiling height to 6'-8" to 6'-10.
 - All doors are required at a minimum by code to be 6'-8" in height. Which is the minimum available ceiling height mentioned above.
 - At all required setbacks from the lot line at the upper level transfer beams or thicker floor slabs will be needed to carry the weight of the required setback's exterior wall. This causes an even greater conflict with the minimum codes. This reduces the ceiling below the 6'-8" minimum heights.
 - At these cramped ceiling heights the average person can touch the ceiling while standing upright on the floor
- Under the proposed amendment, landlords can create higher ceilings in the Main Lobby without cutting a hole in the 2nd floor resulting in unused Market Rate Floor Area.
 - Finally, the ZQA will reduce unnecessary parking requirements for affordable housing, which actually hamper the production of housing.
 - In transit-accessible neighborhoods, households own many fewer cars, and frequently don't use the parking that has been provided and current requirements of 50% of dwelling units.
 - Parking requirements impose unrecoverable costs on affordable housing: it can cost as much as \$50,000 per space to build off-street parking and the price per parking spot is very expensive—for example, most new developments charge at least \$300/spot, which is over 1/3 of the affordable housing rent, not to mention at least \$200/month in lease payments and \$2,000/year in insurance payments.
 - Alternatives to owning/leasing a car; zipcar and other car sharing programs

16 December 2015

Chair Weisbrod and Commissioners thank you for this opportunity to present testimony.

My Name is Mark Ginsberg, FAIA, LEED^{AP}. I am speaking on the Zoning for Quality and Affordability (ZQA) as President of Citizens Housing and Planning Council (CHPC), a Board member of the New York State Association for Affordable Housing (NYSAFHA), as a past President of the AIA New York Chapter, and, most importantly, as an architect whose practice is largely the design of affordable housing. Thank you for this opportunity to speak in strong support of Zoning for Quality and Affordability (ZQA).

Others from CHPC had talked about the importance of this Proposal for affordable housing and why it is so necessary. I want to talk about it from a design and urban design perspective. The current contextual envelope creates a strait jacket. In trying to use all of the FAR with no excess envelope, we are shoe-horning in spaces and creating buildings that are the zoning envelope diagrams, restricting the design, apartment quality and our ability to develop an urban design that responds to the site's context. Below are a few examples of how ZQA will allow us to design higher quality buildings that better fit in the context of New York:

- Currently the rear yard setback pushes building to the front of a zoning lot. That, coupled with setbacks being measured from the street line, forces us to design flat buildings without significant articulation, typically at the property line. The proposed text, by modifying these provisions, will create up to a ten-foot play in a sixty-foot deep floor plate, allowing for greater variation of the façade. Diagrams showing this are attached in my written testimony.
- Outer-court dimensions again discourage variation in the street wall and rear yards. They also discourage the traditional building entrance of the 1920's to the 50's through a landscaped court, since under current regulations the courtyard has to be so wide as to be impracticable. Finally, older buildings often had articulation at the back of the building, a saw-tooth design, to create more window area and efficient plans for deep lots. These saw-tooth buildings are extremely limited under current regulations, requiring the court to be as wide as it is deep. Under the new regulations we will be able to do what was done in older apartment buildings, while maintaining the 30' distance between windows to provide light, air and fire safety.
- Under current height regulations and limited envelope, we are encouraged to make apartments with a minimum floor to floor height of 8'-9" to pack as many floors as possible in the envelope to use all of the floor area. This creates units that feel dark and cramped and are harder to run required sprinkler lines and energy-efficient mechanical systems. In addition, it encourages the creating of commercial space with low ceilings, which are not attractive to many commercial uses. The proposed regulations, with the addition of floor limits and in most cases small increases in height, will create more commodious units and better commercial space.

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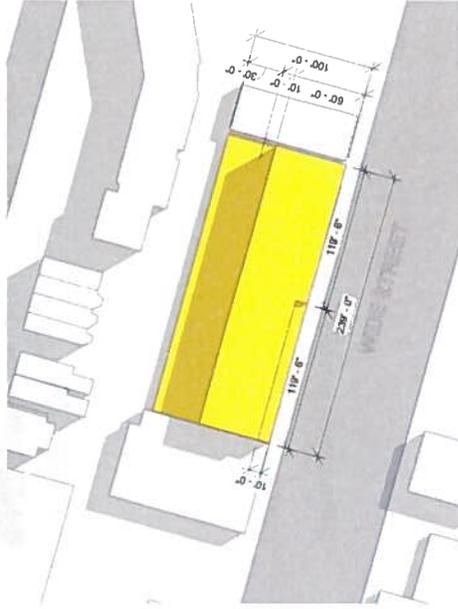
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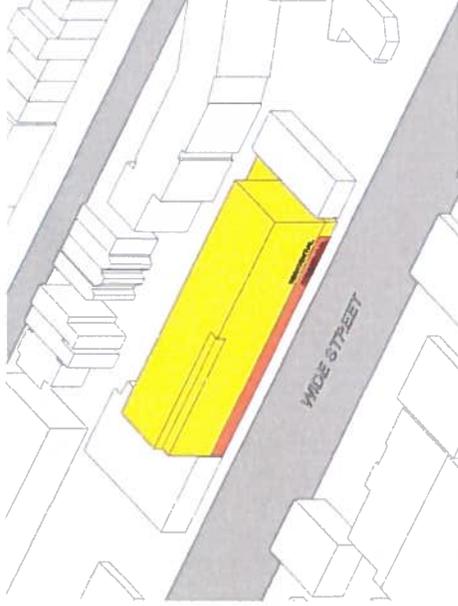
From our experience parking requirements for affordable housing are expensive, for all of us tax payers and make it harder for new developments to promote good urban design.

- Frequently parking is located on the ground floor for cost reasons. This prevents commercial and other uses, which contribute to lively activity, to be located at street level.
- Typically parking is underutilized in affordable housing, we have worked on two NYCHA developments where only 20% of the parking is used, largely by the NYCHA staff.
- Currently we are designing affordable housing with a school in its base, designed based on the ZQA proposal. If parking was required for the affordable housing we would lose ten to fifteen residential units, increase the cost of the school, and lose many of the school activities at street level, all in order to create parking that would largely go unused.

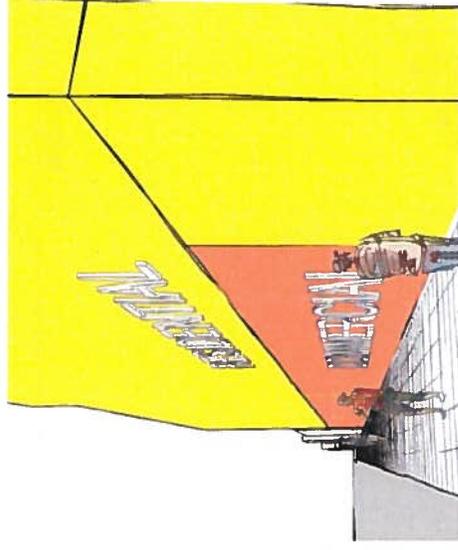
By loosening the envelope and reducing the parking requirements through ZQA, in a number of small ways architect and developers will be able to create better buildings, with greater variation in design that will be better able to fit in with their context and provide better urban design creating more active streetscapes. For these reasons and many more we strongly support the ZQA Proposal.



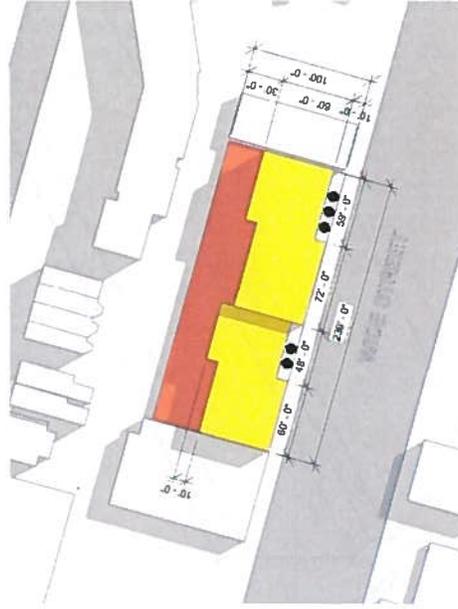
CURRENT ZONING PLAN



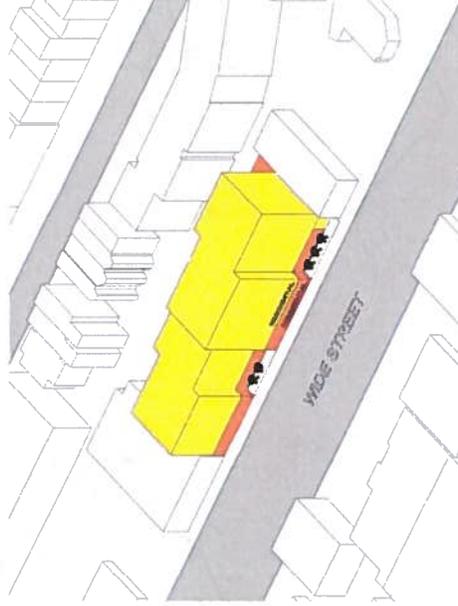
CURRENT ZONING MASSING



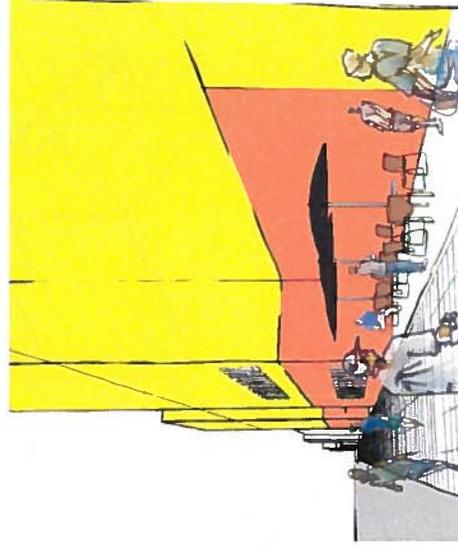
CURRENT ZONING PERSPECTIVE



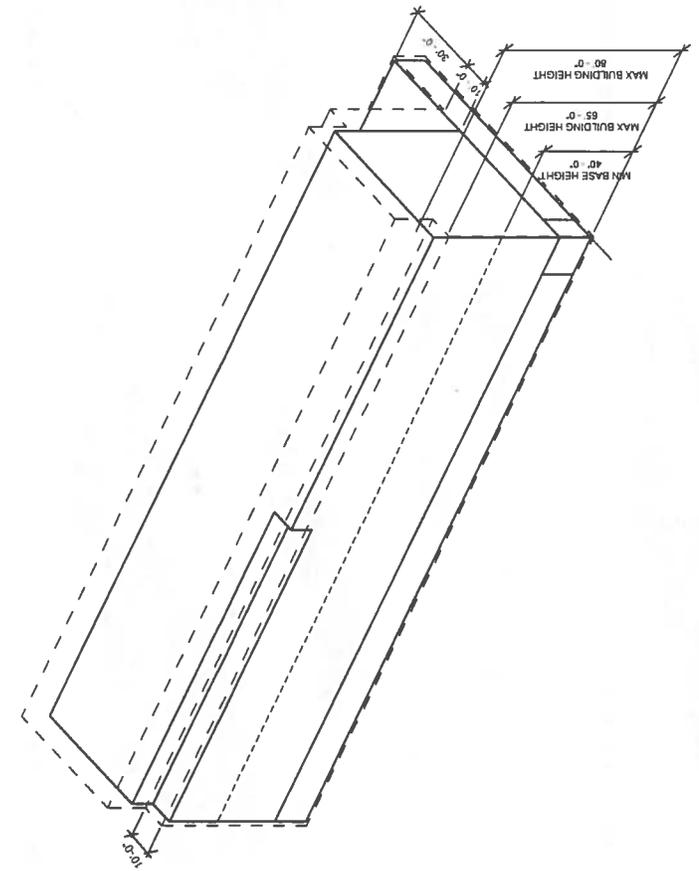
PROPOSED ZONING PLAN



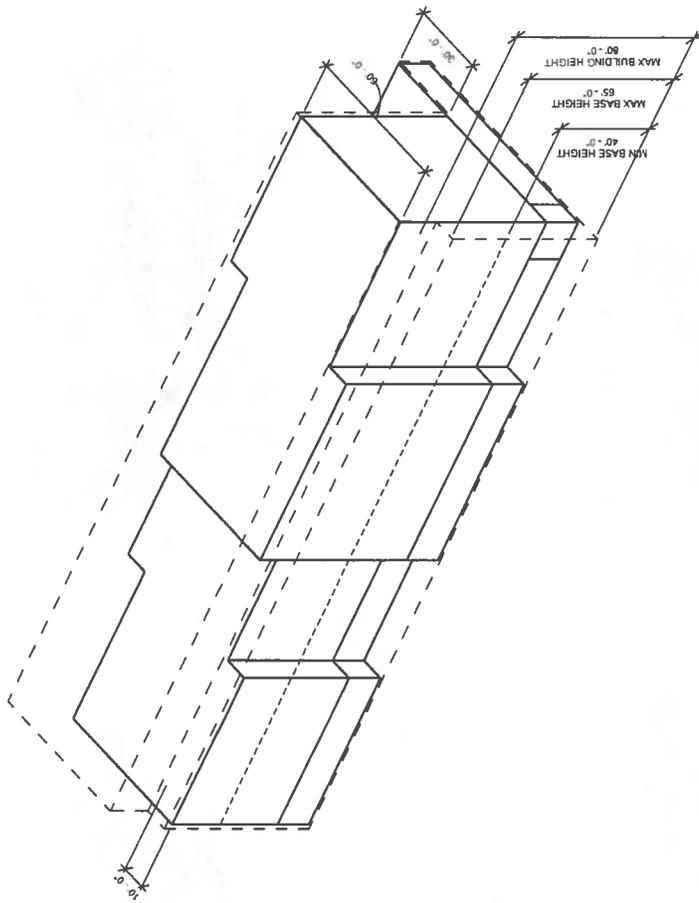
PROPOSED ZONING MASSING



PROPOSED ZONING PERSPECTIVE



CURRENT ZONING ENVELOPE DIAGRAM



PROPOSED ZONING ENVELOPE DIAGRAM



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www.classsizematters.org

Testimony before the City Planning Commission

December 16, 2015

Dear Chair Weisbrod and members of the Commission:

My name is Miho Watabe, and I am testifying on behalf of Class Size Matters, a citywide public interest organization that advocates for smaller classes in NYC and nationwide.

The proposals under consideration today, Mandatory Inclusionary Housing and Zoning for Quality and Affordability, would lead to increased rates of development and school enrollment growth at a time when our public schools are bursting at the seams. According to the city's own data, there are over 556,000 students in schools that are already overcrowded and our elementary schools are at an astonishing 104% capacity. Yet there is nothing in these proposals that would address the need to build new schools along with residential development, and that is simply unacceptable.

Currently the DOE's school capital plan only contains half of the seats necessary to alleviate overcrowding and address existing enrollment growth, no less the accelerated growth that these proposals are likely to create.

We need a far better planning process, including reforms to ensure that school capacity keeps up with development. The CEQR formula that City Planning uses to estimate the impact of new construction on school enrollment is fundamentally inadequate and imprecise. It is based upon data from 1990-2000, and relies on borough-wide data, with no differentiation for neighborhoods within boroughs, and doesn't take into account significant changes in birth rate data and family out-migration rates. Nor does the formula take into account differentiation in the size of the unit or number of bedrooms, as was previously the case.

The CEQR manual also sets unreasonable high thresholds for requiring mitigation. For example, in Brooklyn, no residential development would be projected to have a "significant" impact on elementary schools unless it includes 121 units, and over one thousand units in the case of high schools. It must also cause locally zoned schools to exceed 100 percent utilization, and even then no specific mitigation measures are required. As a result, New York Lawyers for Public Interest and many Community Boards have called for reform of the CEQR formula review process, to ensure that development does not worsen school overcrowding.

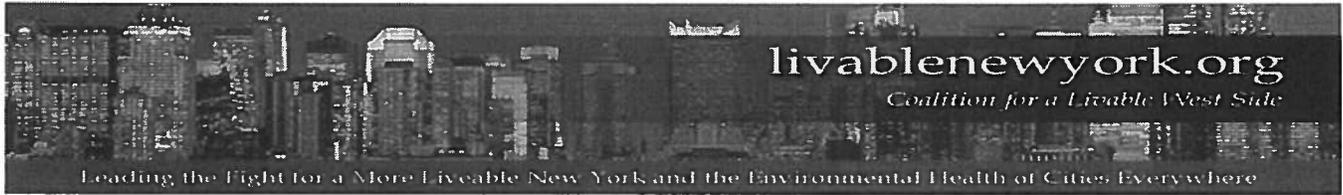
Last spring, the Public Advocate wrote a letter to the Chancellor and the Mayor, along with twenty two Councilmembers, many parent leaders and Community Education Council members, urging an

immediate expansion of the school capital plan and a Commission to fix the broken school planning process.¹ Fundamental reforms to the planning process are needed, including a revamping of the CEQR formula in light of more recent birth and census data, improvement in the DOE's enrollment projections and utilization formula, a more transparent needs assessment, and a more responsive public process that better takes account of the need to build schools along with housing.

Impact fees should also be considered as exist in more than 83 percent of cities and counties, so that developers are obligated to pay into a fund for schools and other infrastructure improvements. All these steps should occur before any zoning changes are instituted that would accelerate the rate of residential development, which has already far outpaced the capacity needs of our public schools.

City officials have often said that their goal is not merely to ensure more housing is built, but also to create better neighborhoods. There cannot be better neighborhoods without a concurrent strategy to build schools along with housing, so that future generations of NYC children are not subjected to even more detrimental conditions.

¹ <http://www.classsizematters.org/wp-content/uploads/2015/06/061515-PA-Ltr-to-Chancellor-Farina-re-Capital-Plan-final.pdf>



Coalition for A Livable West Side * PO Box 230078 * New York, New York 10023
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December 16, 2015

To: Honorable Commissioners CPC
Re: ZQA and MIH

The Coalition for a Livable West Side believes that these two proposals have NOTHING to do with affordable housing. It weakens zoning protections and allows height limits to be raised by 20%-30%. It is the Mayor's gift to developers. **We urge you to reject both proposals.** Mere tweaking will not, as shown in the 469 page document online that contain items lined out ~~document~~, result in a plan that preserves the integrity of neighborhoods. The Mayor's plans will undo the community's successful effort to rezone/downsize 51 blocks on the Upper West Side and impact negatively on our Historic Districts. How can the Mayor offer these proposals when no serious study has been done on how these changes will affect our neighborhood's human scale and unique sense of place? Where is the EIS?

We fully support the analysis and conclusions in Landmark West's commissioned BFJ Planning study of the impacts of ZQA & MIH on the Upper West Side. Here's what the experts say (excerpted from BFJ's November 2, 2015 memo):

"Both ZQA and MIH affect the whole city and raise the question as to why the administration is not pursuing a more deliberative process for a zoning initiative that purports to address the important issue of creating affordable housing.

"It would seem not only prudent but good government to engage in more careful analysis of these proposals rather than to discover once it is a "done deal" that many unintended consequences or collateral damage has resulted.

"The initiative itself is city-wide and raises the question of whether "one size fits all." ...the Upper West Side is a neighborhood that will be more greatly impacted by these proposals than others.

"The impact of these changes will affect more than the height or bulk of buildings. It will ultimately result in new development that could eliminate existing affordable housing and small businesses through rising rents.

"ZQA and MIH set proposed building density and height changes on a collision course with not only contextual zoning district protections, but also landmark and historic district protections.

"The proposed amendments would impact CB7 with height (up to 40 feet) and FAR [square footage] (averaging 20 percent) increases that are far above technical adjustments. Instead, they present much more substantial height and density increases.

"ZQA effectively erases differences in allowable heights between wide and narrow streets.

"ZQA would allow encroachment into the rear yard. Extensions of buildings are not desirable as a matter of public health, safety and quality of life.

"ZQA exempts affordable housing from the Sliver Rules that limit the heights of buildings on lots less than 45 feet wide. This may encourage the demolition of existing, relatively small, residential buildings that contain dwelling units that are currently affordable. In addition, it may result in new, narrow buildings that are significantly taller than their neighbors and out of character with their built context.

"[Special permit and variance processes] may lead to developments that enjoy increased bulk and density without providing the promised affordable housing."

Respectfully,
Batya Lewton, President

**Testimony of Rafael E. Cestero
President & Chief Executive Officer
The Community Preservation Corporation**

**Hearing before the New York City Planning Commission
Regarding the Mandatory Inclusionary Housing and Zoning for Quality and
Affordability Text Amendments
December 16, 2015**

Good morning. Thank you Chairman Weisbrod and other distinguished members of the New York City Planning Commission. My name is Rafael Cestero and I am the President and CEO of the Community Preservation Corporation (CPC), a nonprofit mortgage lender that was formed in the early 1970s to help New York City restore and rebuild communities that had been devastated by deterioration and abandonment. Today we help neighborhoods across the state meet their housing and revitalization challenges. In the last fiscal year alone, we have invested more than \$372 million in communities around the state to support more affordable and sustainable neighborhoods.

I appreciate the opportunity to be here today to testify in support of the proposed Mandatory Inclusionary Housing (MIH) and Zoning for Quality and Affordability (ZQA) text amendment changes, which seek to make this city more affordable to a wide range of New Yorkers, fostering diverse, livable communities with buildings that contribute to the character and quality of neighborhoods. Many people have, I believe, misunderstood these initiatives because they are viewing them in isolation and not in the context of both the city's history and also its present affordable housing efforts, including the Housing New York plan.

Since the 1990's, New York City has been on a steady and impressive trajectory of growth. Over the past 25 years, we have seen the population expand, the city has added new jobs, and incomes have increased – though not as fast as rents – and by all accounts public safety is light years beyond that of decades past. All of this points to an economy that is strong and robust and poised to continue its growth. But we must remember that this has not always been the case.

Throughout the 1970s and 80s swaths of our city fell victim to blight and abandonment that devastated our housing stock and the communities it served. From the South Bronx, to Harlem and East New York – buildings were abandoned, crime was rampant, and hundreds of thousands

of people fled the city for the surrounding suburbs. It was so bad that it took a courageous decision from Mayor Ed Koch to change the city. Instead of fencing off the South Bronx and other neighborhoods as part of a strategy called “planned shrinkage,” he launched a massive housing investment plan that rebuilt much of our city.

Today, New York City is booming in a way that has not happened in generations, and we have become an economic engine for the state, as well as the region and points beyond. This unprecedented growth can largely be attributed to this city’s legacy of investing in our neighborhoods, and in particular those neighborhoods that were scarred and stigmatized the most by disinvestment and flight.

This historical context is important. Over the past few decades the city has rebounded and we have seen an enormous pressure on the cost and demand for housing that is driving change in neighborhoods across the city. Our housing policies have been varied and expansive. Inclusionary Zoning has been a piece of that overall housing strategy, but was never intended to work alone.

In 1987, New York City issued the first Inclusionary Zoning Plan to incentivize the creation of affordable housing and foster economic opportunity in communities. The Bloomberg Administration took a critical next step in recognizing that the city was experiencing large-scale change, and revamped the Inclusionary Housing program to better harness the private market to create new permanently affordable apartments in exchange for greater density. Both policies were set forth in the larger context of the Koch and Bloomberg housing plans.

Today, the de Blasio Administration is proposing sweeping changes to our zoning policies. These changes are both innovative in their scope and within the context of our city’s proud history of investing in underserved neighborhoods in a way that seeks to address the upward pressures of rapid growth and gentrification. And the changes are proposed in the context of the Mayor's remarkable Housing New York plan.

The market pressures our communities face today are not due to the policies or politics of the Bloomberg or de Blasio Administrations. We have done such a great job of making this one of the world’s premier cities – a place where everybody wants to live and invest – that we have

become victims of our own success. The downside is that the city doesn't have unlimited land or unlimited resources, and the scarcity of both has driven up demand as well as costs.

In putting forth this plan the Administration recognizes these issues, but also that the dynamics of the New York City market are strong and can be harnessed to create affordable housing and help lock in affordability in growing communities.

Without seeing the totality of this plan, it is easy to pick apart a zoning strategy as something that would lead to further pressure on low-income communities. But when you look at the various policies and plans that work in concert with one another under the umbrella of the Housing New York plan, you recognize that this is very far from the truth.

Mandatory Inclusionary Housing (MIH) and Zoning for Quality and Affordability (ZQA) are two critical programs that will help to create affordable housing and mitigate gentrification, but they should not and were never meant to be viewed in a vacuum. They must instead be analyzed in the context of the Housing New York Plan and other complementary work of the de Blasio Administration.

Through the Housing New York Plan, the City's Department of Housing Preservation and Development and Department of City Planning—along with other city agencies—have put forth a series of new programs that encourage the creation of new affordable housing, aggressively pursue the preservation of existing affordable housing, seek to protect the quality of our housing stock, mitigate uncontrolled growth, reign in unscrupulous owners, ensure tenant protections are enforced, and direct resources to NYCHA public housing so that all of our residents have more opportunities to live in safe and affordable housing.

I am here as the head of CPC and as a former HPD Commissioner to express my full support for the objectives of MIH and ZQA as vital new components of the Housing New York plan.

Voting down these new proposals because they are complicated, viewed out of context or because there are details that need working out, is myopic and potentially damaging to our city. The details can and will be addressed. The Administration is not blind to the need for dialogue. But if we simply say no, then the results are obvious. Re-zonings will not happen, additional affordable housing will not be required in private construction projects, and the main forces for

change will continue to be those unaddressed market pressures of gentrification that are pushing our neighborhoods out of reach for working-class New Yorkers.

MIH and ZQA are integral components of this comprehensive strategy. Without them I have no doubt that the pressures facing our neighborhoods will get worse. There are some who are saying no because they don't want their neighborhoods to change. That is understandable, but the truth is that these neighborhoods are already changing, that change is moving quickly, and it is pushing affordable housing further and further to the fringes of our city and beyond.

MIH and ZQA will give neighborhoods an opportunity to maximize the resources of their existing housing stock and will require permanently affordable housing to be created when new buildings go up. With these strategies in place New York will be equipped to harness the forces that are shaping our city while continuing a legacy of investing in the affordability and revitalization of our neighborhoods.

Thank you.

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Testimony of the Continuing Care Leadership Coalition
Before the New York City Planning Commission
Regarding the Zoning for Quality Affordability Text Amendment Proposal by the New
York City Department of City Planning
December 16, 2015

Introduction

Good afternoon. My name is Diane Barrett and I am the Director of Government Relations with the Continuing Care Leadership Coalition (CCLC), representing not-for-profit long term care providers in the New York metropolitan area. We appreciate the opportunity to provide testimony today.

Our members are leaders in the development and delivery of innovative care models for seniors, children, and individuals with special chronic and post-acute care needs.

Presentation Outline

In my testimony today, I will discuss the following:

- The growing aged population in NYC
- The need for not-for-profit providers to accommodate NYC's aging population
- The need for regulatory flexibility for our providers to design facilities and programs that will meet the future needs of this population

A Growing Aged Population

In New York City the number of persons ages 65 and over is projected to rise to 1.35 million in 2030, a 44.2 percent increase over a thirty year period. By 2030, every member of the large baby-boom cohort will be at least 65 years old. As a result, the share of the population that is elderly will increase from 11.7 percent in 2000 to 14.8 percent in 2030. The need for senior housing and long term care services that are safe, accessible, and affordable for older New Yorkers is critical to the growing number of seniors in New York City. It will be vital to build greater flexibility into the City's regulatory environment in order to meet this demand.

Not-for-profit Long Term Care Services are Needed to Care for NYC's Aging Population

Building and sustaining a vibrant and robust not-for-profit long term care system is essential to ensuring the delivery of quality healthcare and addressing the increasing needs of senior citizens in New York City. In New York, not-for-profit providers are innovators in developing and offering service models in the community, and coordinating the care of patients with complex chronic care needs. CCLC supports the Planning Commission's efforts to update the zoning resolution to allow not-for-profit providers to develop the long term care services needed to care for New York's growing elderly population.

Developing Regulatory Flexibility to Meet the Needs of the Aging Population

To meet the needs of the growing number of senior citizens in New York City, regulatory changes to zoning laws will be required. The changes proposed to the New York City Zoning Resolution will give providers important new flexibility to meet the demands of New York City's growing aging population. CCLC supports the following changes.

Zoning Requirements for Nursing Homes - The New York City Planning Commission currently requires nursing homes to apply for special certification and permits to renovate an existing nursing home or to design a new facility. This requirement is only required of nursing homes - it does not apply to any other community facilities, including schools, universities, libraries, and houses of worship, among others. To meet the current requirements, nursing homes typically must hire consultants and prepare an environmental review process that can take a minimum of seven months to complete. These requirements are outdated and were developed prior to the New York State Department of Health's certificate of need process, which healthcare facilities must go through when undertaking major projects or renovations. The duplicative administrative requirements are arduous and financially burdensome to nursing homes. The outdated regulations hinder providers' abilities to maintain up-to-date facilities and fully offer person-centered care models needed to ensure high quality service.

To achieve a robust and healthy long term care system in New York City, unneeded administrative obstacles must be removed to allow long term care facilities to flourish and meet the growing demands in the city.

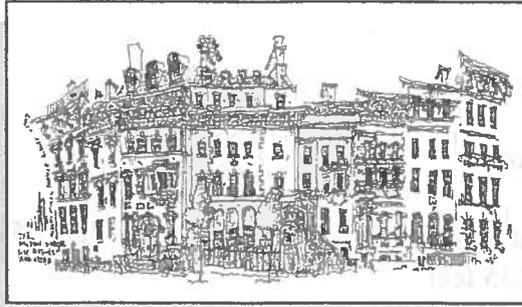
Continuing Care Retirement Communities (CCRCs) - For many thousands of people, Continuing Care Retirement Communities provide an active and supportive environment, with essential flexibility in both housing and care arrangements. CCRCs offer multiple levels of housing and support in one location, so that older residents can move from one to the other as their need for care increases. These communities allow seniors to remain among friends and family as they age, which is crucial to thousands of

seniors who want to maintain vital relationships and valued independence for as long as possible.

Due to ambiguity and a lack of guidance in the current regulations, long term care providers have been deterred from developing CCRCs in New York City. The proposed zoning regulation would create a new definition “long-term care facility” that would include CCRCs. This new definition would give the needed clarity to allow the potential development of CCRC models in New York City. To ensure there is oversight, CCRCs would still be required to secure licensure and certification requirements by New York State.

Lower Density Districts Need to Allow a Larger Building Envelope - The proposed zoning resolution would allow newly built nursing homes in lower density districts to build nursing homes that have increased floor to floor heights and building envelopes that can accommodate elevators. The current regulations require providers to apply for special permits and waivers when facilities are built in lower density districts which is costly and burdensome to the nursing homes. This would allow for a swifter, less expensive building process.

I appreciate the opportunity to provide these perspectives and recommendations today. CCLC looks forward to working in partnership with the New York City Planning Commission and the Department of Planning to ensure that essential long term care services remain strong and available to our City’s elderly and disabled.



DEFENDERS *of the* HISTORIC UPPER EAST SIDE

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City Planning Commission Hearing

December 16, 2015

Although Defenders of the Historic Upper East Side is very much in favor of creating affordable housing and housing for senior citizens, we find that the current proposals – Zoning for Quality and Affordability and Mandatory Inclusionary Housing – will be very damaging to the built environment and to the quality of life in our community, and in the rest of the city. We also fear that they will lead to the loss of affordable housing because the bonuses are awarded simply for the construction of affordable units, not for a net increase in such units. In some, if not most, areas, soft sites contain more affordable housing than will be provided in the new buildings.

Like the entire city, the Upper East Side has lost a great deal of affordable housing. The Administration's first priority should be to save the affordable housing that we already have; new construction will never catch up if we continue to lose this housing at the current rate.

We believe that the Mandatory Inclusionary Housing proposal might be salvageable if sufficiently amended, but that Zoning for Quality and Affordability is too flawed and must be withdrawn. Details of our specific concerns follow.

ZONING FOR QUALITY AND AFFORDABILITY

THE "SLIVER" LAW – ZR 23-692

The "Sliver Law" was enacted in 1983 in response to the universal outrage that greeted these eyesores in the early 1980's. It remains necessary to this day and the dramatic change proposed in Zoning for Quality and Affordability – making buildings with affordable or senior housing exempt - would lead to irreparable damage to the character of the Upper East Side and other affected residential neighborhoods. It would also lead to the loss of the affordable housing that these narrow buildings now contain.

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The changes in the height limits are:

- In R10 districts, the current height limit for a building less than 45 feet wide is 100 feet. Under ZQA, the height limit would be 235 feet.
- In R10A districts, the current height limit for a building less than 45 feet wide is 100 feet. Under ZQA, the height limit would be 235 feet.
- In R9X districts (Lexington Avenue), the current height limit for a building less than 45 feet wide is 75 feet. Under ZQA, the height limit would be 205 feet.
- In R8B districts, the current height limit for a building less than 45 feet wide is 60 feet. Under ZQA, the height limit would be 75 feet.
- In the Special Madison Avenue Preservation District, the current height limit for a building less than 45 feet wide is 80 feet. Under ZQA, the height limit would be 210 feet.
- In the Special Park Improvement District, the current height limit for a building less than 45 feet wide is 100 feet. Under ZQA, the height limit would be 210 feet.

There is little if any incentive to build affordable or senior housing on sites more than 45 feet wide. For example, the ZQA bonus on an R10 site allows the developer two additional FAR if the 20% of the building consists of affordable or senior housing. That is 2.4 FAR for affordable or senior housing and 9.6 FAR for market-rate housing; without the bonus, the developer can build 10 FAR of market-rate housing.

Exempting the sites from the “Sliver Law” creates an enormous incentive to demolish the narrow buildings, many, if not most, of which currently contain affordable housing. The gains in market-rate housing illustrate this point:

- In R10A districts, a building less than 45 feet wide can have 100 feet of market-rate housing. Under ZQA, it can have 188 feet.
- In R9X districts (Lexington Avenue), a building less than 45 feet wide can have 75 feet of market-rate housing. Under ZQA, it can have 164 feet.
- In R8B districts, a building less than 45 feet wide can have 60 feet of market-rate housing. Under ZQA, there is no change; it can also have 60 feet.
- In the Special Madison Avenue Preservation District, a building less than 45 feet wide can have 80 feet of market-rate housing. Under ZQA, it can have 168 feet.

- In the Special Park Improvement District, a building less than 45 feet wide can have 100 feet of market-rate housing. Under ZQA, it can have 168 feet.
- In R10 districts, a building less than 45 feet wide can have 100 feet of market-rate housing. Under ZQA, it can have 188 feet.

This pointless and destructive provision of ZQA should be deleted.

CONTEXTUAL ZONES

The height limits in Contextual zones are already generous and exceed the heights of buildings whose configurations they are intended to replicate. For example, the prewar apartment buildings upon which R10A is modeled average 160 to 180 feet in height; the R10A limit is 210 feet. ZQA proposes to add 5 to 25 (IH, etc.) feet, which will bring new buildings totally out of context with their neighborhoods.

The first 5 feet on R10A is intended to accommodate a taller ground floor. 210 feet can easily accommodate this increase; if there is a need for flexibility for the higher ground floor, it can be achieved by creating an option to increase the base height by 5 feet.

The effect on R9X is sufficiently damaging that it will be addressed separately.

LEXINGTON AVENUE – R9X

If Lexington Avenue were only one foot narrower, it would qualify as a “narrow street.” ZQA proposes to increase the building height by 15 and 45 (IH, etc.) feet. The current height limit is 160 feet, which is the maximum of what is appropriate on such a narrow avenue; the proposed 205 feet would seriously impair its character.

AFFORDABLE HOUSING LOSS AND INCREASE

The current systems of giving bonuses for building affordable housing is self-defeating because the existence of affordable housing on the development sites is not taken into consideration. This leads to, and has led to in the past, the net loss of affordable housing – and large giveaways to developers. Any bonus should be awarded for a net increase in affordable housing.

AFFORDABLE HOUSING INCENTIVES

ZQA states correctly that the changes will not lead to an increase in market-rate housing. In fact, there usually will be a small decrease in market rate housing. It seems unlikely that any developer would go to the expense of building a larger building if he gets nothing, or less than nothing, in return.

The only exception is if he builds a "Sliver" – a destructive and widely-reviled building form.

MANDATORY INCLUSIONARY HOUSING

SPOT ZONING

It appears that that this proposal could lead to cases of unfortunate spot zoning at the request of a developer.

DESIGN TRUST FOR PUBLIC SPACE TESTIMONY ON ZQA TEXT AMENDMENT

December 16, 2015

Thank you Chairman Weisbrod and members of the City Planning Commission for this opportunity to speak in support of key aspects of the Zoning for Quality and Affordability Text Amendment.

My name is Susan Chin, Executive Director of the Design Trust for Public Space, a nonprofit organization dedicated to the future of public space in New York City. Over the past 20 years, the Design Trust helped save the High Line with our feasibility study; jumpstarted New York's first custom-built Taxi with our design recommendations; and developed the sustainability guidelines, precursor to Local Law 86 and PlaNYC. With every project we act as a catalyst. Our latest project has evaluated ground-floor space in mixed-use affordable housing developments.

It is essential to the well-being of all New Yorkers as the City creates more affordable housing that we all recognize the diverse character of our communities. New developments that respect and strengthen these unique qualities through well-designed retail and community space are crucial. Good retail design is flexible to accommodate a variety of uses of differing size, such as restaurants, daycare facilities, and supermarkets that contribute to vibrant street life and healthy neighborhoods.

Under the existing Zoning Resolution, there is a mismatch between the permitted maximum building heights and what is needed to design both quality affordable housing units *and* quality ground-floor spaces. A limited height increase of five feet for a new building overall would have a minimal impact on the overall scale of a building, but could encourage significant investments in viable ground floor space—a well-defined retail presence, better security and services, improved accessibility—with adequate height clearances, greater flexibility of space and uses, and leasability.

Too frequently, these vital services are scarce or absent in New York City's low and moderate-income neighborhoods, forcing residents to travel further to

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DESIGN TRUST FOR PUBLIC SPACE

meet their basic needs. In part, this is due to the difficulties faced by architects and developers of mixed-use affordable housing, who encounter many design challenges and barriers to leasing ground floor space, often resulting in vacant storefronts and missed opportunities to meet the community's needs.

In 2014, the Design Trust's independent jury selected a proposal by the NYC Department of Housing Preservation and Development to evaluate and address these design challenges. Since that time, the Design Trust and our Fellows—private sector experts in retail design and mechanical engineering—have worked closely with NYC HPD to create a set of detailed design guidelines for 'leasable' ground-floor space in mixed-use affordable housing. Other City agencies, architects, developers, business improvement districts, and community development organizations provided valuable feedback and participated in an extensive Peer Review process. The Fellows identified nine "Critical Success Factors," fundamental to spacious, flexible storefronts, that can attract local businesses of a variety of sizes that meet the needs of local residents and employees, create more inviting streetscapes, increase leasability, and create new job opportunities.

The proposed zoning text amendment alone will not create quality design, just as our *Laying the Groundwork* guidelines in totality, will not create a great building. Our neighborhoods will reap the maximum benefits from new developments only when they emerge from a meaningful community engagement process and when our City holds itself, developers, and architects accountable to those aspirations. The Design Trust encourages the Commission to consider the proposed limited additional height as one element within a broader campaign to achieve not only 80,000 new units, but also the basic services and quality streetscapes that all New Yorkers deserve.

New York City Planning Commission
Public Hearing on Zoning for Quality and Affordability and
Mandatory Inclusionary Housing
1 Bowling Green, New York, NY
Testimony by Martin Dunn, President, Dunn Development Corp.
December 16, 2015

My name is Martin Dunn and I am the founder and president of Dunn Development Corp., a Brooklyn based developer of affordable and supportive housing. I have been developing affordable housing for 23 years – initially as the director of a non-profit community development corporation – and have been involved in the development of more than 3,500 apartments including some of the most highly regarded affordable housing projects in New York City. I almost exclusively develop affordable housing - 99% of the units I've worked on have been affordable and only 1% market rate housing.

Mandatory Inclusionary Housing

I first want to speak in favor of the Mandatory Inclusionary Housing proposal. I have been a long-time advocate of mandatory inclusionary housing, first testifying at a City Council hearing in 2003 in favor of it in anticipation of the Greenpoint/Williamsburg rezoning.

Mandatory Inclusionary Housing is critical so that in stronger markets, the market rate units can generate affordable housing without capital subsidies. This enables the limited capital subsidies to be used in neighborhoods like East New York and Brownsville, where development cannot occur without such subsidies and where subsidies can be used to drive deeper affordability. At the same time, MIH will create a hedge against future gentrification in lower income neighborhoods like East New York. Williamsburg would be a different neighborhood today if mandatory inclusionary housing had been implemented in 2005 as would 4th Avenue in Park Slope. This has been a long time coming and the City needs this critical tool.

Zoning for Quality and Affordability

I next want to speak in favor of the Zoning for Quality and Affordability.

Parking Requirements

Existing parking requirements are a significant impediment to affordable housing development, increasing costs, reducing affordability and often taking away from open space for children's play areas, tenant gardens and other open space. Parking can

require significant taxpayer subsidies to build and yet often goes underutilized by the tenants in our buildings. The vast majority of low income tenants cannot afford to own cars and of those that do, many do not want to pay even nominal charges for parking and choose instead to park on the street.

I want to give three quick examples to illustrate: our Liberty Apartments project (3 blocks from a subway stop) in East New York, developed in partnership with Cypress Hills Local Development Corporation, has 18 parking spaces to meet the zoning requirements. Only six of them are being used by residents – 1/3 of the spaces. The rent for a parking space is \$40 per month. That totals \$2,880 in revenue per year not accounting for bad debt or collection costs. In some years that does not even cover the cost of repairing the motorized gate and other parking related maintenance costs. And the occupancy of the parking is down from 2010 when the building opened and we had 9 residents using spaces. At that time, 13 residents owned cars, but 4 chose to park on the street to save the \$40 per month.

At our King Garden Seniors project in Brownsville (1 block from a subway stop), 3% of the residents own cars. Which means of the 15 parking spaces required by zoning, 2 are used by residents. The revenue - \$10 per month per car – totals \$240 per year. And we expect the parking utilization to go down over time as the seniors age in place – not that it can go down much further.

At our Highbridge Overlook project in the Highbridge section of the Bronx, we built on a steeply sloped site with rock outcroppings. The slope and the rock were not problems for the residential housing as we located the lobby and elevators at the base of the hill and stepped the building up the hill with parts of the building starting 3 floors up. The construction was economical as we put the footings directly on rock with minimal excavation - except for the parking. We had to partially cut the parking garage into the rock and then we had to build a retaining wall along the steep sloped driveway. Because of the rock excavation, the driveway retaining wall and some other structural costs related to the parking, parking which would normally cost \$50,000 a spot to build instead cost more than \$80,000 per space. The revenue generated from the parking - \$0. We can't charge rent for the parking because we would have to forgo low income housing tax credits on the cost of constructing the parking garage.

There are a number of vacant land sites we have passed on purchasing in the Bronx because the parking requirements make developing the sites as affordable housing completely unfeasible.

We have tens of thousands of people on waiting lists to get into our affordable apartments. We have no one on the parking waiting lists.

Housing is a human right. A parking space – not so much.

Building Envelope

Too often we are forced to choose between having quality retail or community facility spaces on ground floors and losing a floor of residential affordable housing. Or alternatively, we instead put apartments on the ground floor, even in commercial zones, because that's better than building marginal retail spaces that are hard to rent to quality tenants. Residential tenants are instead stuck with apartments right at street level where they get to choose between privacy and any natural light.

We have seen the positive impacts from when we've been allowed to change the zoning to allow for taller 1st floor heights, most recently on our Livonia Commons project in East New York where we have 15' to 16' floor to floor heights on the ground floor to create beautiful storefronts. This creates high quality spaces – we've already signed up a pharmacy, a supermarket, a community arts center and a Catholic Charities program and there is extremely strong interest in the spaces. If we had the normal 10'-12' ground floor heights we're often stuck with, we would have marginal spaces which would attract marginal commercial tenants.

And on voluntary inclusionary sites, unusually shaped sites, sloped sites, etc. we cannot always fit the allowable floor area within the zoning envelope restrictions.

Senior Housing

There is a desperate need for affordable senior housing throughout New York City. The higher floor area ratios for senior housing are an important tool, but we often cannot take advantage of them because of existing envelope restrictions. ZQA enables affordable housing developers, often non-profit organizations, to build more affordable housing that is permanently for seniors.

I appreciate the opportunity to testify and would be happy to answer any questions.



**Testimony of Enterprise Community Partners, Inc.
To the New York City Planning Commission
Public Hearing on
Mandatory Inclusionary Housing and
Zoning for Quality and Affordability**

December 16, 2015

Good morning. On behalf of Enterprise Community Partners, I'd like to thank the City Planning Commission for the opportunity to testify today in support of the Mandatory Inclusionary Housing and Zoning for Quality and Affordability proposals. My name is Elizabeth Strojan and I lead the policy work for Enterprise's New York office.

Enterprise has worked to create and preserve affordable housing in New York and nationwide for nearly 30 years. We have created nearly 50,000 affordable homes for 114,000 New Yorkers through capital investments, programmatic support, and policy advocacy. Despite the sizeable investment by our organization and our partners in government, the non-profit, and private sectors, New York is in the midst of a housing insecurity crisis with nearly one million low-income households either homeless or paying more than half of their income on housing costs.¹ Untold more are being forced out of the neighborhoods they've called home for years by rising prices.

While these numbers seem daunting, the problem is solvable and we know how to do it. Affordable housing is the solution and we need a lot more to correct the mismatch between supply and demand. To get more affordable housing in a high cost market like New York, we need to use every tool in our toolbox. We continue to advocate for additional public resources, but we must also use other approaches like these proposed zoning changes.

MIH and ZQA will increase the supply of affordable housing and are an important step to set a new baseline threshold for private sector contribution to affordable housing. To throw these proposals out because they don't go far enough would be extremely detrimental, and would also ignore the other programs and policies addressing the issue from other angles, some of which can be layered on these policies for deeper affordability. These changes are a part of the solution, not all of it. But we can't solve the problem without setting this baseline standard. In a time when we see federal cuts to housing programs year after year, we must harness the resources from the private market.

Development is driven by the market and will happen with or without a plan to include affordable housing. In fact, development must occur to accommodate our city's growing population. In neighborhoods where new development will happen, it is important to include developer-provided affordable housing to bolster the City's other initiatives to preserve housing opportunities for low- and moderate-income households.

¹ Enterprise Community Partners "2015 New York City Housing Security Profile and Affordable Housing Gap Analysis" <http://www.enterprisecommunity.com/servlet/servlet.FileDownload?file=00P1400000ihDrDEAU>

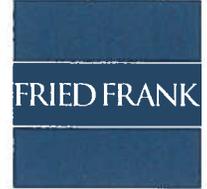
Inclusionary Housing would also further the goals of fair housing by providing opportunities for low-income families to move to or remain in affluent or gentrifying neighborhoods with access to good schools and other amenities. The ability to create more affordable housing in a variety of neighborhoods is key to making sure we keep our city one of opportunity for all.

I also want to speak to the benefits of ZQA, which will help reduce the onerous requirements that drive up cost of development and make affordable and senior housing development difficult. Specifically, reducing parking requirements for senior housing developments near public transit will allow more units to be built for a population hit hard by the affordable housing crisis, low-income seniors. A recent study by LiveOn NY found that many parking lots next to senior housing developments go unused. This is low-hanging fruit for getting more housing for seniors.

To be sure, every neighborhood in New York is unique, and specific community needs should be addressed within any neighborhood plan. Thus, it is crucial that the Administration listen to the needs and ideas in each community as individual rezonings roll out. Enterprise will be supporting our non-profit, community-based affordable housing partners on working with stakeholders to ensure that comprehensive neighborhood plans are able to use MIH and ZQA to meet the needs of individual communities. We appreciate the Administration's willingness to work with these groups to continue to refine their plans.

We need MIH and ZQA to help increase the supply of affordable housing, promote the goals of fair housing, and bring much needed resources to help us solve our city's affordability crisis.

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December 23, 2015

OFFICE OF THE
CHAIRPERSON

BY HAND

DEC 23 2015

Hon. Carl Weisbrod, Chair
& Commissioners
New York City Planning Commission
120 Broadway, 31st Floor
New York, New York 10007

29250

Re: Zoning for Quality and Affordability Text Amendment (ULURP No. N160049ZRY / CEQR No.15DCP104Y)
Support for Proposed Improvements to Senior Housing Regulations

Dear Chair Weisbrod and Commissioners:

This firm represents a variety of entities that are seeking to develop senior housing in New York City. The provisions of the Zoning Resolution that currently govern such facilities do not reflect contemporary service models and pose barriers to the development of cost-effective housing designed specifically to meet the needs of seniors, with small individual units, substantial common space, and a range of care levels often provided within a single building.

The proposed Zoning for Quality and Affordability text amendment (the "ZQA Amendment") includes a variety of provisions that would remove impediments to the creation of senior housing and facilitate the development of facilities that will allow City residents to age in place. We write to encourage the Commission to adopt these provisions of the ZQA Amendment in order to meet the current and growing need for senior housing in the City.

The Need for Senior Housing in New York City

The Department of City Planning's Notice of Completion for the ZQA Amendment's Draft Environmental Impact Statement provides a useful overview of the significant unmet need for senior housing in New York City. For example, the City currently has half as many assisted living facilities per capita as other counties throughout the state, and the New York State Department of Health estimates that there is an unmet need for 8,300 long-term care facility beds. As noted by the Department, the senior population of New York City is projected to increase by approximately 400,000 people, from 1 million to 1.4 million, over the next 25 years.

Hon. Carl Weisbrod

December 23, 2015

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Our clients are seeking to develop senior housing addressing this need across the spectrum of the City's senior population, including a variety of care levels and ranging from Medicaid-eligible populations to frail elderly in need of high levels of direct care provided on a private-pay basis.

The Benefits of ZQA

The ZQA Amendment would clarify and improve the treatment of senior housing facilities under the Zoning Resolution, making it practical for owners and operators to provide a wide range of senior housing and care facilities that will enable New York City's growing senior population to age in place. Among other things, the ZQA Amendment would eliminate zoning classifications that reflect outdated service models and unnecessary distinctions based on form of ownership that are unrelated to any zoning purpose. For example, the ZQA Amendment would:

- establish a new zoning classification for Use Group 2 affordable senior housing, as well as a new classification for Use Group 3 facilities, including both for-profit and non-profit facilities, that looks to State licensure as the key indicia of senior housing status;
- permit more types of senior housing as-of-right, rather than required certifications and/or special permits from the City Planning Commission; and
- provide for increased floor area and a more flexible zoning envelope to improve the functionality of senior housing facilities.

In addition to the above proposed changes, which have been amply highlighted in the public review process, we wanted to take special note of the way in which the ZQA Amendment would facilitate the unit counts and internal layouts needed for various forms of senior housing, including, for example, assisted living. Nationwide, senior housing typically features smaller individual units for residents and a greater amount of communal space, including lounge and dining areas, as compared with most residential apartment buildings. This approach to design – more compact units attached to generous amenity spaces – is widely considered to have the best outcomes for the residents who are encouraged to interact with their neighbors rather than spend long hours alone in their room.

However, under current zoning, the application of residential “dwelling unit factors” can inhibit the ability to achieve the numbers of small unit configurations increasingly typical of senior housing. Today, “non-profit residences for the elderly” in some low- and medium-density residential districts are subject to a reduced “dwelling unit factor,” as compared to residential uses, a result which allows for a higher unit count to be provided. However, the standard residential density requirements

Hon. Carl Weisbrod

December 23, 2015

Page 3

unnecessarily limit the number of units that may be provided in those senior housing facilities which are classified as residential uses. In addition, as Use Group 3 community facilities are not subject to density requirements, difficulties currently arise in calculating the permitted unit count in a building that includes both Use Group 2 and Use Group 3 senior housing, as would be typical in a senior housing facility providing a range of care levels.

The ZQA Amendment would eliminate this unnecessary impediment to senior housing by providing that density requirements would not apply to either “affordable independent residences for seniors” (“AIRS”), the new Use Group 2 classification that would replace the current “non-profit residences for the elderly” classification, or to any senior facilities licensed by the State, all of which would be classified as community facilities under the new “long-term care facility” (“LTCF”) category. This would eliminate any distinction in the applicability of the density requirement based on form of ownership, by permitting for-profit as well as non-profit senior housing facilities to optimize the numbers and configuration of units without applying density limitations. Further, in buildings that have both LTCF and non-AIRS residential uses, the text would clarify that only the residential floor area would be subject to density requirements, so that an optimal unit count may be provided in the LTCF portions of a building.

The proposed elimination of residential density requirements for senior housing, and the other amendments outlined above, would greatly improve the ability of owners and operators to provide state-of-the-art senior housing facilities for New York City’s seniors. The ZQA Amendment would facilitate the development of facilities providing a wide range of senior services at all income levels, to an extent not currently permitted. Accordingly, we strongly encourage the Commission to adopt these changes to the Zoning Resolution in order to meet the current and growing need for senior housing in New York City.

Sincerely,

A handwritten signature in black ink, appearing to read "David Karnovsky", with a long horizontal flourish extending to the right.

David Karnovsky

Scott Fraser Testimony/Friends of Bushwick Inlet Park
Cell(347)249-3875
scotfraser@gmail.com

The city should vote “no” to the deBlasio administration’s misguided efforts to rezone our city in the name of affordable housing. All you need to do is to follow the money in what is basically a giveaway to developers at the expense of everyday citizens starving for a liveable city. I am a member of Friends of Bushwick Inlet Park and we have been attending City Planning’s community board presentations, to warn residents in communities like East New York about what is coming if this Quality and Affordability/Mandatory Inclusionary Housing Plan is approved.

Greenpoint-Williamsburg in Brooklyn’s northwest corner has a storied industrial past that has left us mired in pollution. Our own rezoning is a cautionary tale - the largest rezoning in New York City history along 185 blocks of our cherished East River waterfront and yet we can’t even get the City to commit to purchasing our entire 28-acre Bushwick Inlet Park. We have one of the world’s largest oil spills, one of the world’s largest sewage treatment plants, and New York City’s only warehouse for radioactive waste. And yet we see little if no environmental remediation for our beleaguered community. We are one of New York City’s most open-space starved communities with a rock bottom 26 square feet of open space per person compared to the 158 square feet per person city average.

After our own rezoning why are we unable to obtain the necessary funds to purchase the last remaining 7.5 acres currently occupied by Citistorage which are needed to complete our park? A deal is imminent between property owner Norman Brodsky and Midtown Equities to build a mall or towers on this land because it is rumored there is no way the city can afford it. And yet dozens of high-rise luxury towers and hotels are beginning construction each month in our community. We are told that the mayor believes there is no need for a park in our community. Tell that to the children in our schools who benefit from one of the highest percentage of subsidized lunches in New York City. We have been and continue to be a working class community that is

now being walled off from the water because of rezoning and new construction.

Beware East New York, South Bronx, East Harlem, Staten Island! After ten years all we have of our promised 28-acre Bushwick Inlet Park is a 4-acre astroturf soccer field.

December 16, 2015

*by Kim Fraser, Friends of Bushwick Inlet Park
718-637-1461
kimfrase@gmail.com*

When Will DeBlasio See the Light on Parks? (New York magazine, July 16, 2015) asks an important question. I want to widen the question to New York City. *When Will New York City See the Light on Parks?* We need an urban plan that goes beyond administrations and politics. We need a development plan with a focus on the health and well being of people. We should not have to beg developers to do the right thing. We should not be conned by the city into believing that they want community input and participation only to come to realize they have already done deals and they never intended to listen to anything the community had been working on for years. We don't need a study to tell us that open, green space in a dense urban environment is vital to the health and survival of a city like New York. Second graders know this. We know this. And we know how we are feeling right now. We can't breathe. We can't relax. We feel disrespected. Sorry Mayor De Blasio, Bloomberg made this commitment to our neighborhood but now it is your job to fulfill that promise.

The park I am fighting for is Bushwick Inlet Park. It is on the East River waterfront and was promised to the Greenpoint/Williamsburg communities in 2005. In 2005 our entire waterfront was rezoned for residential development. Bushwick Inlet Park is a 28 acre park that was promised as remediation for the over development we are seeing now. This very important park was not mentioned in the New York magazine article. Why? Aside from about 4 acres that are mostly soccer field the rest of the park sits desolate and in despair. The middle 7.5 acres have yet to be acquired by NYC and are about to be sold to a mall developer. How on earth could a city like New York ever let a mall or luxury towers go up on land that could be the crown jewel of New York City parks? From this beautiful stretch of the East River one looks north to the Empire State Building, Chrysler Building, United Nations and the 59th Street Bridge. As you sit on the edge you feel as if you could reach out and touch these iconic buildings. This wide stretch of the New York City

skyline looks as if it is the backdrop of a fantastical set. It feels unreal. You can almost hear Frank Sinatra singing *New York, New York*. And actually, this view has been in the greatest movies, plays, songs and poems ever conceived about our city. The view to the south is the Williamsburg Bridge and beyond. You feel like Walt Whitman is whispering in your ear and whether you are a young kid from the streets of New York or an out-of-towner with a dream, as you sit on the edge looking out over the water you feel like the ghosts of other dreamers are reminding you that it is possible. Who would allow a mall on this?

Not many New York City parks can be built on a natural resource. The 185 blocks rezoned on the edge of Greenpoint and Williamsburg will be a wall of glass towers. Like the towers going up all over NYC there is nothing inspiring about them and certainly nothing down around the bottom of them that is remotely like the fabric of New York. Life under the towers feels like a ghost town. You even wonder if there are people in the towers.

Greenpoint and Williamsburg are not the only neighborhoods being over developed. Luxury towers are going up everywhere and the same skinny sidewalks and lack of parks remain below. In some cases toxic plumes float beneath the gleaming towers with the wonderful waterfront views. In our neighborhood all of the towers are being built on land that has been designated a flood zone since Hurricane Sandy.

And where are the views for the public left behind? Where is the inspiration for future generations of New Yorkers whose living room windows are not the NYC skyline? How can anyone believe that this lack of planning is a good idea for the future of one of the greatest cities in the world? Today on the streets of Greenpoint and Williamsburg you can hear languages from around the world. Some are tourists and some have come to live in our fair city to fulfill a dream. The population in our neighborhood increases every week. We have gone from a neighborhood housing oil tanks and toxic industry and the largest sewage treatment plant and underground oil spill in the world to Miami high-rises. We have always been a neighborhood with one of the lowest amounts of park space per citizen. Since the city "reclaimed" our waterfront in 2005 we continue to be one of the neighborhoods with the

lowest green space per capita. Thanks NYC for all the reclaiming. The small four story railroad flats housed the long-shore men from the waterfront and the men and women working in small toxic factories in the blocks upland. In many cases these were hard working immigrants from Poland, Puerto Rico and Ireland. These were people who helped build New York and to this day keep it running. We could never catch a breeze on the waterfront. Now if you catch a breeze it will be on a bench in the courtyard or on a walkway of a development where you don't live. Young families are everywhere carrying newborns in snugglies and holding toddlers hands. Pile driving cranes pound away each morning for hours and yet there are no new parks or other city services to support the massively increased density. Who wants to live like this? The East River has become the central river of NYC. Young people are streaming over to Brooklyn and Queens and any other outer borough where they can find a rent that they can afford. I don't see how New York City can be a sustainable choice for these young families if de Blasio and all administrations after his do not put our citizens before developers. Developers are now the arbiters of our future. The lifeblood of New York City is being squeezed out by people who have no skin in the game. They will build as high and with as little space between each building as they are allowed and then they will not look back. They do not care how the increased density affected the neighborhood. And least of all, is a concern for those people displaced because their income does not come up to the "affordable" housing level established by Mayor de Blasio's master planners. Their main concern is that the city will not have to pay for anything. They will make any deal that the developer demands because the city is afraid that the developers will leave town. Does that make any sense? Will developers desert New York City for greener pastures? I don't think so.

Greenpoint and Williamsburg are neighborhoods that are showing the strains of New York City's lack of vision. Gentrification has arrived and there is no remediation for the new density or the lack of affordability. The 2005 rezoning plan has failed in Greenpoint and Williamsburg's eyes and we want other poor neighborhoods to look at us and see what is coming.

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of the UPPER EAST SIDE
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December 16, 2015

City Planning Commission Public Hearing Testimony by Rachel Levy

Re: Zoning for Quality and Affordability Text Amendment N 160049 ZRY

Good morning. My name is Rachel Levy and I am the Executive Director at FRIENDS of the Upper East Side Historic Districts. Since our founding in 1982, FRIENDS has worked to preserve the livability and sense of place of the diverse neighborhoods that comprise the Upper East Side.

Our concern for neighborhood preservation led us to commission a study which found that approximately 38% of parcels on the Upper East Side contain some form of affordable units. Preservation of these units is critical if we want to maintain this area's affordability and livability for all. Between 2007 and 2014, CB8 saw a net loss of 26% of affordable units compared to a loss of 6% citywide. During that period, nearly 1,600 buildings lost rent-stabilized apartments. Of those, 70% were east of Third Avenue, illustrating the alarming loss of affordability in our area. This trend continues at an even greater pace.

We are grateful to the city for removing R8B from the Zoning for Quality and Affordability (ZQA) text amendment, and of course support the city's goals of quality and affordability. We agree that design variation is a good thing, but we ask the city to take a hard look at individual neighborhoods to see if there are blocks where one or two or three of these new structures could disrupt street fronts in a detrimental way—and still fall short of the goal to add additional affordable units.

We are concerned that the proposed ZQA text amendment will not, either by itself or in combination with Mandatory Inclusionary Housing (MIH), produce a net gain of affordable housing when balanced with the loss of affordable units to redevelopment. Any plan conceived to spur the construction of affordable housing should take into account the replacement of one existing unit for one new unit. Otherwise, our neighborhoods will suffer a further loss. We believe the text, as written, does not address this issue.

The MIH proposal has at its heart a wonderful goal. But FRIENDS asks why the City is looking only at rezonings to achieve this. We ask the City to work with the State, and all of its agencies to determine a better route to affordability. Today, there is a dollar cost to the 421-a program and others. Today's proposals have another cost: the loss of light and air and the strain on streets and sidewalks, public transit, schools and parks as a

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result of increased height and density. What kind of city will we have if our apartments are shrouded in darkness, if there are not enough schools or parks? We ask the City to think harder about creating a variety of programs to address affordability. For example, as an alternative to luxury decontrol, offer tax and/or other incentives to owners of existing affordable units to keep those units affordable, and the benefits will be enormous.

FRIENDS asks the administration to keep an open mind and work with even more stakeholders about ways to preserve community character across the entire city. The City needs to thoughtfully consider each neighborhood's unique qualities, and determine how new buildings could best be knitted into our varied communities. FRIENDS is happy to assist the City in any way we can.

Thank you.

GREENWICH VILLAGE COMMUNITY

TASK FORCE

119 Morton Street apt. GA
New York, NY 10014
ph. (212) 633-2040

December 16, 2015

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

Dear Chair Weisbrod,

I am writing on behalf of the Greenwich Village Community Task Force to express our strong concerns about the city's so-called 'Zoning for Quality and Affordability' plan. This plan would unnecessarily weaken neighborhood zoning protections and significantly increase height limits for new some developments with little or no public benefit.

This plan would increase by 5-10 feet the height limits for MARKET-RATE developments in the Far West Village. There is simply no justification for this.

It would grant much greater height increases for 80% market rate/20% 'affordable' developments under claiming that such lucrative bonuses are necessary to motivate developers to participate in the program. However, there is no evidence to support this claim and much to contradict it.

Equally troubling, the plan would eliminate "sliver law" restrictions on overly tall, skinny developments if they set aside just a fraction of their units for affordable or senior housing.

The plan would allow construction in rear yards in situations where it is currently prohibited.

Last, the plan would grant substantial bonuses in height and size for new luxury, market-rate developments that include just a small fraction of units set aside as "senior affordable housing."

The argument that the current height limits unfairly restrict developers is completely specious, at least in our community. We are not aware of a single new building in our area that was unable to utilize its full FAR under the

existing contextual zoning. We would also like to note that the buildings constructed under contextual zoning in our area have been aesthetically far superior to the buildings built under the previous, non-contextual zoning.

The Mandatory Inclusionary Housing (MIH) proposal would also potentially do more harm than good. Affordable housing will apparently only be mandatory if and when a developer creates a huge amount of new market rate housing. As has happened in West Chelsea and Williamsburgh, the flood of market rate housing will push up prices and made these neighborhoods overall exponentially less affordable, while destroying neighborhoods' scale and sense of place.

Sincerely,



Zack Winestine

Co-chair, Greenwich Village Community Task Force



**Greenwich
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Historic
Preservation**

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Anthony C. Wood

November 16, 2015

Hon. Gale Brewer
President, Borough of Manhattan
One Centre Street, 19th floor
New York, NY 10007

OFFICE OF THE
CHAIRPERSON

DEC 2-2015
29027

Re: 'Zoning for Quality and Affordability' proposal

Dear Borough President Brewer:

The Greenwich Village Society for Historic Preservation urges you to oppose provisions of the 'Zoning for Quality and Affordability' (ZQA) proposal, including those which would increase height limits for new residential construction throughout our neighborhoods, rolling back long and hard-fought-for protections. The arguments for the plan are based upon flawed, faulty, or misleading premises and information. ZQA's proposed changes to allowable building heights offers little or nothing in return in terms of quality of design and affordability. ZQA's "one-size-fits-all" approach, applying standards to areas throughout the city regardless of local conditions or needs, disempowers communities, eliminates zoning options, and sidesteps traditional procedures requiring local analysis of impacts and local consultation to take effect.

Rather than expanding the zoning tool box to create more varied options for addressing local planning goals and desires, ZQA limits them, by eliminating current rules and retroactively as well as prospectively replacing them with new ones. Because ZQA does not look at conditions on a neighborhood-by-neighborhood basis as an individual ULURP would, there is no detailed analysis of the effect of proposed changes on local areas. It takes away from local communities, their Councilmember, their Community Board, and their Borough President the leverage over the rezoning process which an individual, local rezoning offers.

The proposal could be amended so its provisions become new zoning rules or categories which are added to the existing text, rather than replacing the existing text. Thus these provisions which would only take effect if mapped in the future through individual ULURP actions requiring local analysis of impacts and allowing increased local leverage and input over the outcome. Barring such a change, we urge you to recommend denial of the following elements of ZQA:

Proposed 5-10 ft. Increases in Allowable Height for Market-Rate Developments in Contextual Zones GVSHP strongly urges rejection of this provision, for which there is no need, and which will not increase the quality of new developments.

DCP claims the proposed height increases are necessary to allow adequately-scaled ground floors and floor-to-ceiling heights above. However, in our neighborhoods we have seen many new developments in contextual zones with 13' 6" ground floors (the height DCP deems "ideal"), perfectly adequate floor-to-ceiling heights, with utilization of full allowable FAR. The notion that height increases are necessary to allow better design is simply false. Given that many developments in contextual districts already have 13' 6" ground floors, the 5-10 ft. increase in

allowable height will simply result in taller buildings, not improved quality. See attached images and information.

DCP also claims that height increases are necessary to allow greater variation in depth and setbacks in the front of buildings to allow for better design. While we would have no objection to allowing some greater degree of setbacks in the fronts of buildings, we do not agree that increasing the allowable height of such developments is necessary to achieve this. Nor would allowing such height increases necessarily result in greater depth or setbacks on building facades, as ZQA proposes granting such height increases without requiring the increased setbacks or depth. Thus ZQA buildings might get the allowed height increases while still coming flush to the streetwall.

Proposed 5-20 ft. Increases in Allowable Height for Market-Rate ‘Quality Housing’ Developments in Non-Contextual Zones GVSHP strongly urges rejection of this provision, for which there is no need, and which will not increase the quality of new developments.

DCP claims the proposed height increases are necessary to allow adequately-scaled ground floors and floor-to-ceiling heights above, and for new Quality Housing developments to be able to utilize full FAR. Much as with market-rate developments in contextual zones, there is little or no evidence that there is a need for greater ground floor or floor-to-ceiling heights, or that such changes will result in improved designs. There is also no evidence that height limits need to be increased to allow developers to utilize full FAR in Quality Housing developments, or that the current height limits is discouraging participation in this program.

The proposed 20 ft. height limit increases for Quality Housing developments on narrow streets in R8 and above districts is particularly troubling.

Proposed Increases of up to 25 ft or more of Allowable Height for 80/20 developments in Contextual District Inclusionary Zones GVSHP strongly urges rejection of this provision. There is little or no evidence that such increases will result in more developers opting into the affordable housing program, as DCP claims, and much evidence to indicate it will not. DCP’s claim that there is not enough room to comfortably fit affordable housing into the existing contextual envelope is simply contradicted by the facts; we have seen multiple developments in inclusionary zones in our neighborhood with 20% affordable housing utilizing the existing height limits and full FAR. While others have not included the affordable housing, this clearly indicates that the height limits are not the reason why some do not, and changing those height limits therefore would not change those outcomes.

As an example, at 138 East 12th Street (3rd Avenue), a developer opted not to include 20% affordable units in a development in an inclusionary zone in our neighborhood, even though at 91 feet there was more than sufficient room to include the affordable units and retain the generously-scaled ground floor and floor-to-ceiling heights in the development. This demonstrates that height limits are neither an impediment to the inclusion of affordable housing nor are they even an impediment to building generously-scaled 100% market rate developments.

Instead, as long as the program remains voluntary, clearly some developers will chose not to participate. The current disincentives appear to be bureaucracy and the complexity of including both types of units in smaller-scaled developments, which ZQA will not change or address. If ZQA passes, there is good reason to believe that it will result in no increase in the production of affordable housing over what we would have gotten without ZQA, but the 80/20 developments might simply be 31% taller. There is no reason to roll back neighborhood zoning protections and height limits for this reason.

Proposed Increase in Allowable Height and Bulk for Developments Which Include A Fraction of Non-Permanent “Senior Affordable Housing” GVSHP questions the appropriateness and generosity of this provision in light of the limited public benefit. ZQA calls for large increases in the allowable bulk and height of such developments in contextual zoning districts for reserving no more than 20% of units for “senior affordable housing” for a period of no more than 30 years.

Because they will be allowed to be larger and taller than other new buildings, such developments will have a significant impact upon the scale and character of neighborhoods. But the payoff of only a fraction of the units being actual senior affordable housing, and only for a limited period of time, seems modest in comparison to the large bonus being granted for what will be largely (and eventually possibly entirely) luxury, market-rate, residential developments. We urge reconsideration of this provision.

Proposed Elimination of Sliver Law Protections and Restrictions on Rear Yard Encroachments for Inclusionary and “Senior Affordable Housing” Developments GVSHP strongly urges rejection of these provisions. Protections against overly-tall and narrow sliver developments, and restrictions on rear-yard incursions, are essential to healthy, well-designed neighborhoods. There is little or no evidence that these changes would significantly assist with the production of either general population or senior affordable housing. But it would do damage to the scale, fabric, and livability of residential neighborhoods.

It should also be noted that ZQA is premised on several false or inaccurate suppositions and assertions. These include:

- **Zoning should allow all developments to access full potential allowable FAR in all cases.** This is simply untrue. Placing a limit on the maximum allowable FAR is only one way in which zoning is intended to regulate development. Zoning is also intended to ensure that adequate light and air reaches the ground, that uses are not in conflict, and that certain characteristics of sections of the city are reinforced and perpetuated. There is no reason why allowable FAR should always trump these other important goals, and the zoning variance process remains available for any developer who can demonstrate that they cannot make a reasonable return on their property under the existing zoning restrictions.

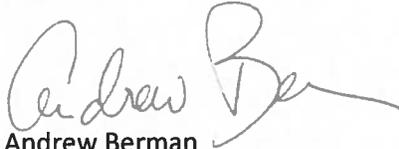
- **Existing contextual zoning height limits do not allow developments to reach their full FAR, especially if they are seeking to include 20% affordable housing -- at least not without inadequately-scaled ground floors and floor-to-ceiling heights.** The above bullet point notwithstanding, this is also untrue. As discussed earlier, we have seen numerous examples in our neighborhood which run counter to and give lie to this claim. Beyond that, this assertion is based upon two studies, one by the Citizen's Housing Planning Council (CHPC) and one by the Department of City Planning (DCP), both of which are based upon misleading or irrelevant data:
 - The DCP analysis of the ability to achieve full FAR in contextual and inclusionary zoning districts under "packing the bulk" and ideal conditions (see attached) is based entirely upon analysis of narrow street, interior lot sites which are the most restricted types of lots in terms of setback requirements and lot coverage restrictions. By contrast, wide street lots and corner lots have much less restrictive provisions and thus allow more massive developments with greater floor area. What is particularly misleading about using this methodology is that in Manhattan, and certainly in our neighborhoods, Inclusionary Zones almost never occur on narrow street interior lots, but almost exclusively cover wide street and corner lots, making this analysis is inapplicable. However, the DCP report in no way makes this clear.
 - The CHPC report purports to show how difficult it is to access full FAR in several different developments. However, what the report does not make clear is that the developments covered by the report are almost exclusively 100% affordable housing developments, not the 80/20 or 100% market-rate developments covered by ZQA. 100% affordable housing developments have very different needs, configurations, and layouts than 80/20 or 100% market-rate developments, and thus to use such developments to imply that changes are needed for the types of developments covered by ZQA is false. Additionally, there may well be accommodations which are appropriate to make for 100% affordable developments but which are not worthwhile tradeoffs for 80/20 or 100% market rate developments. Finally, 100% affordable developments can often be categorized under the zoning code as community facilities, rather than residential developments, and thus can be governed by an entirely different set of zoning rules than those which ZQA covers, so here as well the comparison is false and misleading.

Finally, it should be noted that the height limit changes called for in ZQA would have a striking effect on many communities. On avenues in the East Village, which now have R7-A zoning with 80 ft. height limits, ZQA would increase height limits by 31% to 105 feet. On many of those blocks the existing built form averages 40 to 50 feet, and thus

the new height limits would result in buildings twice the height of most of their neighbors or more – a dramatic difference.

ZQA would undo years of hard work by communities throughout the city, which in many cases fought hard for the height limits it would roll back. Often those height limits were not nearly as restrictive as communities sought, but they accepted them, and often had to accept upzonings or increases in allowable development at nearby locations to “balance” these restrictions. Now those careful compromises are being gutted with little or no payoff to the public in terms of improvements in either quality or affordability. We urge that these provisions be rejected, or at least amended to become additions to the zoning text, keeping the existing rules in place, so they would only take effect if and when approved by individual, local rezoning actions.

Sincerely,

A handwritten signature in black ink that reads "Andrew Berman". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

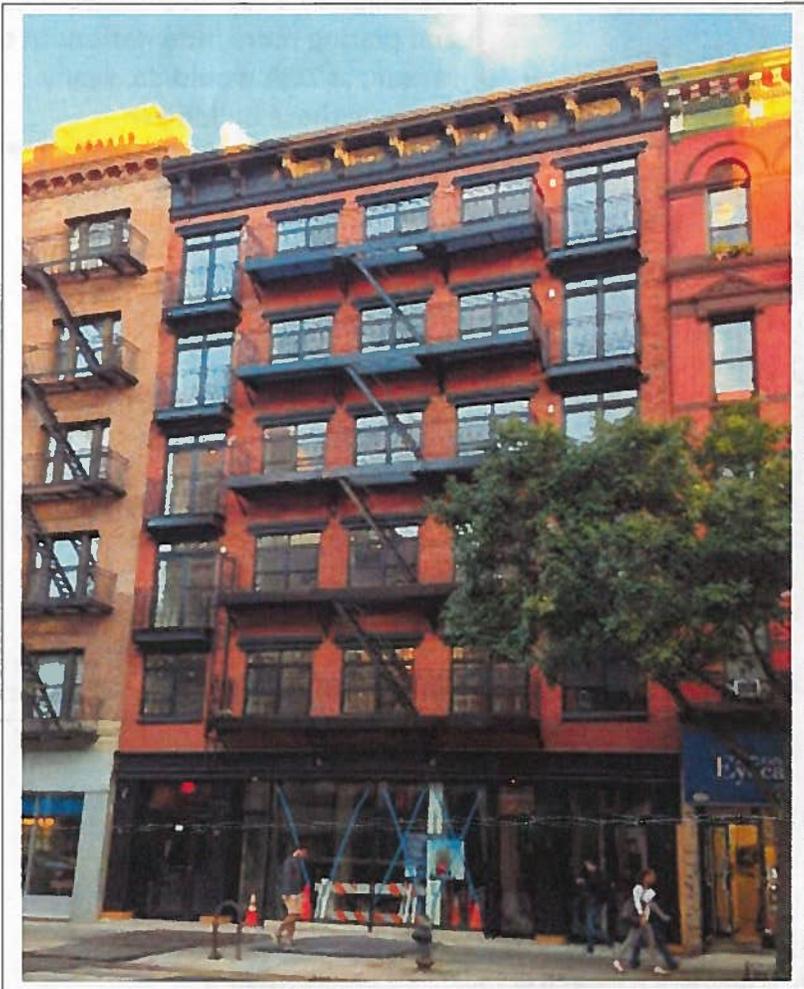
Andrew Berman
Executive Director

Cc: Members of the City Council
Members of the City Planning Commission
Community Boards 1-59

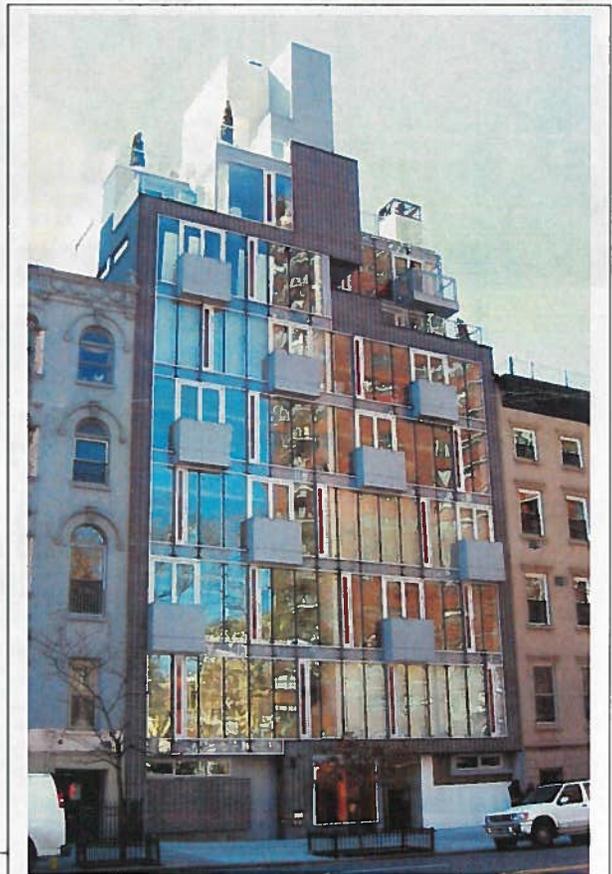
DCP claims that existing contextual zoning rules force flat, uninteresting designs with cramped ground floors.

The following are all developments in CB 2 or nearby in CB 3, 4, or 6, built under existing contextual zoning rules.

(note: under ZQA, the ground floors of these developments might be 5 ft. higher, and there might be more indentations in the façades)



152 Second Avenue (9th/10th Street)



Would increasing the height of these buildings by 5 feet in the ground floor and placing more indentations in the façade, as ZQA would do, really improve these buildings?

350 West 23rd Street

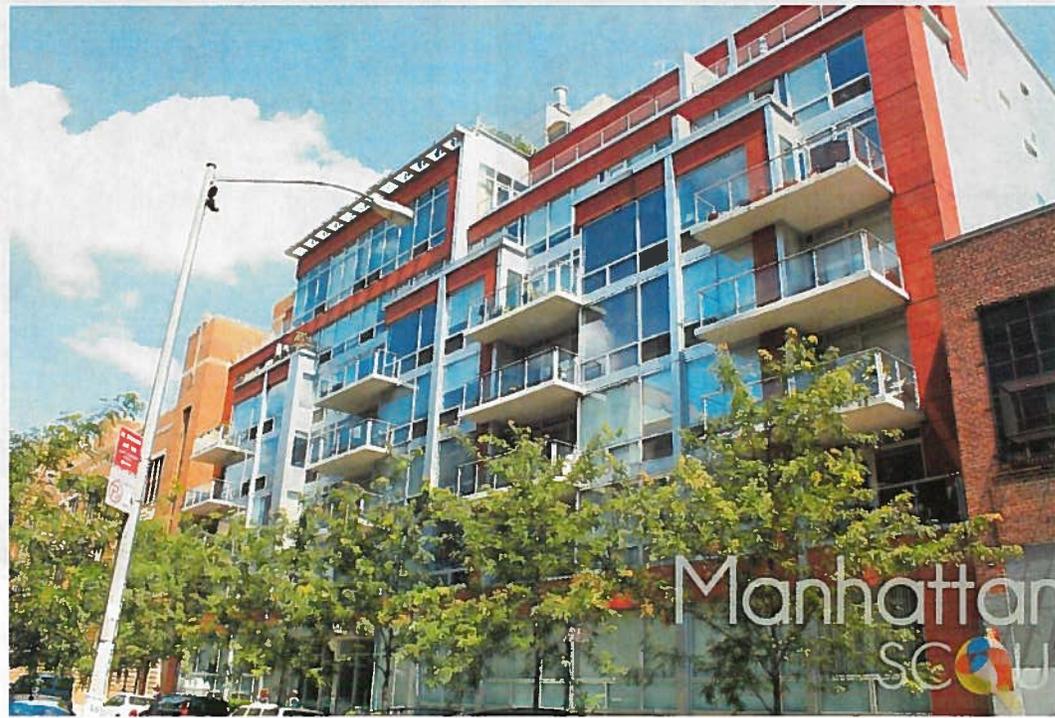
EMPORIS

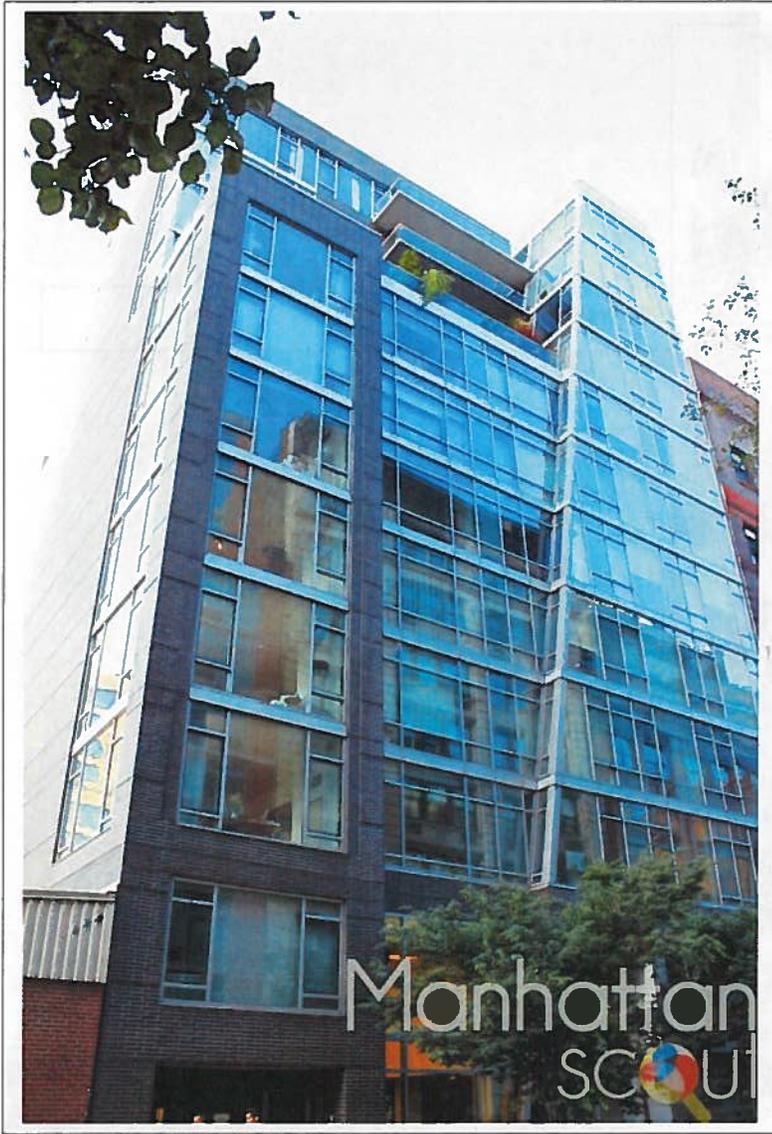
201 West 17th Street



Would increasing the height of these buildings by 5 feet in the ground floor and placing more indentations in the façade, as ZQA would do, really improve these buildings?

425 East 13th Street (1st Avenue/Avenue A)





163 West 18th Street

Would increasing the height of these buildings by 5 feet in the ground floor and placing more indentations in the façade, as ZQA would do, really improve these buildings?



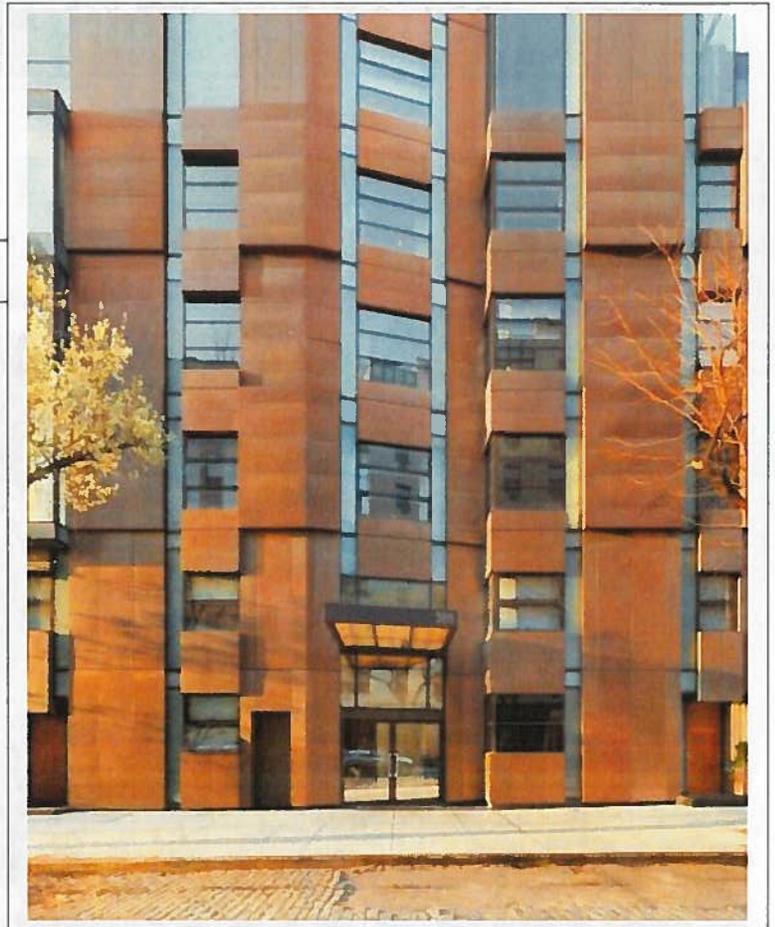
211 East 13th Street (2nd/3rd Avenue) with closeup of ground floor; note the plantings and recessed windows



57 Irving Place (17th/18th Street)

385 West 12th Street

Would increasing the height of these buildings by 5 feet in the ground floor and placing more indentations in the façade, as ZQA would do, really improve these buildings?



DCP claims that existing contextual zoning rules prevent market rate developments from using full FAR, do not allow the inclusion of extra FAR for affordable housing in inclusionary zones, and when they do, require “substandard” floor heights and cramped ground floors.



While not the most attractive design, 11 Second Avenue's design shortcomings are not a result of a lack of height or a lack of indentations in the façade, which is what ZQA would change.

11 Second Avenue @ 1st Street: R8-A equivalent zoning (such as CB 2 has in the Far West Village and on 14th Street; has Inclusionary Housing provisions, such as CB 2 is seeking in University Place/B'way corridors)

- 120 feet tall (limit for R8-A)
- Includes 20% affordable housing
- Utilized full FAR
- Generously scaled ground floor and lobby

In fact, several developments have been built in CB 3 in IZ zones with 20% affordable housing, and several more are under construction, UNDER THE EXISTING HEIGHT LIMITS.



138 East 12th Street @ 3rd Avenue -- R8-A equivalent zoning (such as CB 2 has in the Far West Village and on 14th Street; has Inclusionary Housing provisions, such as CB 2 is seeking in University Place/B'way corridors)

- Utilized full allowable FAR while only rising to 91 feet (max allowable 120 ft.)
- 100% market rate
- Generously-scaled and successful ground floor retail (West Side Market supermarket)
- Double-height lobby
- Had sufficient room within zoning envelope to allow additional FAR for affordable housing, but developer chose not to **SHOWING THAT HEIGHT LIMITS ARE NOT THE REASON DEVELOPERS IN SOME CASES CHOSE NOT TO OPT INTO THE INCLUSIONARY HOUSING PROGRAM** (20% affordable housing)

In fact, throughout CB 2 & 3, by far most new developments in contextual zones reach full or nearly full allowable FAR.

BUT it is important to remember that zoning was NEVER intended to guarantee developers FULL FAR.

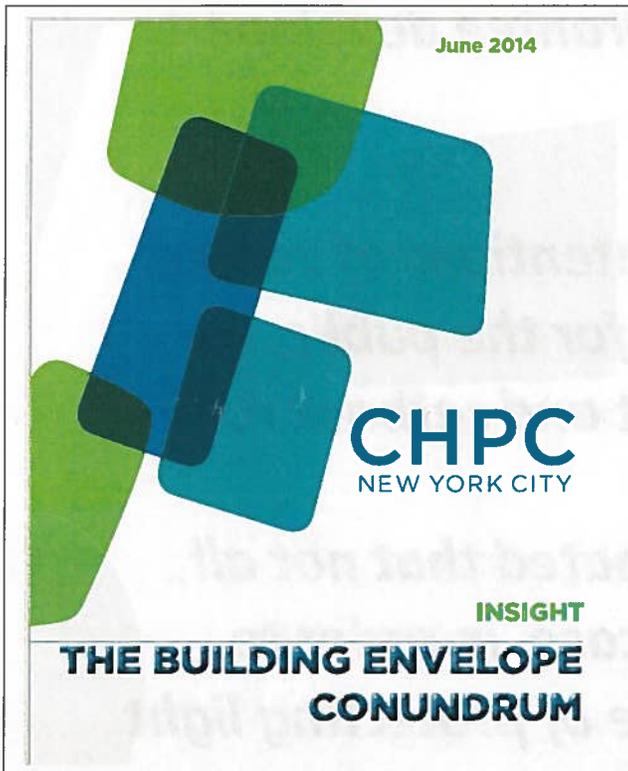
In fact, one of the original intentions of zoning was to protect light and air for the public, by establishing absolute height and setback rules.

The 1961 zoning also anticipated that not all FAR could be used in every case, in order to achieve the primary purpose of protecting light and air.

When contextual zoning was introduced in 1987, its primary purpose was to ensure that new development matched the scale of its surroundings, and that proscribed building envelopes and height limits were not exceeded.

ZQA would run contrary to this long-standing principle regarding the purpose of zoning.

The sources of DCP's claim that developers cannot utilize full FAR under existing contextual zoning rules is faulty. They frequently cite:



The report's conclusions:

For the seventeen projects examined we found that: Only one project was able to develop all of its allotted floor area. In eight projects, floor area was left unbuilt because of their building envelope rules. For these projects, it was the contextual building envelope rules that determined the development capacity of the buildings rather than their allotted floor area. The buildings that were limited by their envelope were underbuilt by an average of 11%. In total 56,543 square feet of buildable space was lost from these eight projects. In a further eight buildings, neither the allotted floor area nor the building envelope was maximized. This was typically because the number of housing units for the building was determined by the subsidy program it was constructed under, or the developer simply chose to limit the size of the building for other reasons. Because of this, we are unaware of whether the development capacity of these buildings would have been determined by the floor area or the building envelope rules.

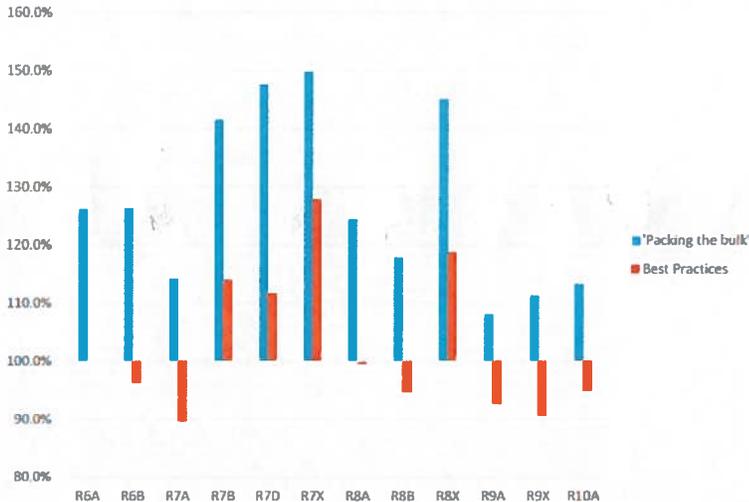
What this report fails to make clear is that almost all of the projects studied were 100% affordable housing developments, NOT the 80% market rate/20% affordable developments which ZQA would apply to.

100% affordable developments have very different requirements and programs than 80/20 predominantly market rate housing. There is no reason to conclude that changes which MIGHT be necessary for 100% affordable developments should apply across the board to luxury housing with a 20% set aside for affordable units.

Note: 100% affordable developments often qualify as 'Community facilities' and therefore can be and often are governed by very different rules than market rate/IZ developments.

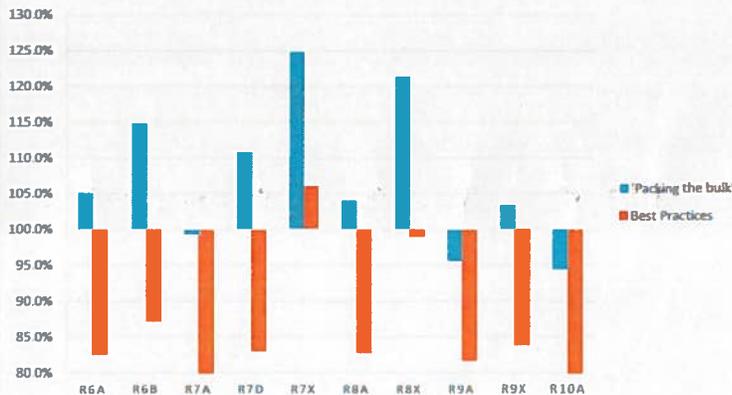
HOUSING NEW YORK: ZONING FOR QUALITY AND AFFORDABILITY FINAL SCOPE OF WORK FOR AN ENVIRONMENTAL IMPACT STATEMENT

Figure 8: Bulk envelope capacity as a percentage of permitted floor area



As the chart shows, this slight adjustment in floor to floor heights and building depth can easily be the determinant in whether a new development can accommodate all of its permitted floor area. Additional

% OF ALLOWABLE FAR THAT CAN FIT WITHIN THE EXISTING BUILDING ENVELOPE



As the chart shows, while most districts can accommodate the permitted FAR using a 'packing the bulk' strategy, the quality of this space would likely be undesirable, and may impact the marketability of market rate units (which could in turn undermine the necessary cross-subsidization of affordable units). In nearly every scenario, the existing contextual envelope is unable to accommodate the permitted Inclusionary Housing floor area when reasonable best practices are applied. This lack of flexibility not only results in the creation of inferior dwelling units, it results in inferior buildings, since the envelope cannot accommodate streetscape design measures such as façade articulation, and a nuanced relationship to the sidewalk depending on the district (such as a planted buffer in Residence Districts and a sizeable retail heights in Commercial Districts). Similar results are found using the additional floor area permitted under Section 23-147 for non-profit residences for the elderly.

DCP's ZQA Study concludes that in most cases, full FAR cannot be utilized within existing contextual zoning envelopes and height limits, using these charts (left) to illustrate the limitations under the existing system.

However, these figures are based ENTIRELY upon narrow street/interior lot rules, WHICH HAVE THE STRICTEST LIMITATIONS for the layout and lot coverage of new developments, as opposed to wide street and corner lot rules, which have much more relaxed rules, allow greater utilization of FAR, and are where inclusionary zones are more frequently found.

Under ZQA, the allowable height for new development on most avenues in the East Village (most of 2nd Avenue through Avenue C) will increase from 80 ft (currently) to 105 ft - a 31% increase.

80 ft. is already considerably greater than the existing scale, but more closely matches it.

105 ft. is in most cases anywhere from a 70% to a 200% increase over the existing scale of development.

On other avenues, such as Avenue D and Lower 2nd Avenue, the allowable height for new development will also increase by 25 ft., from 120 to 145 ft.

Location	Current	Proposed	Difference	% Increase
Second Ave btw 9th & 10th Sts.				
146 2 AVENUE	56.4	105 ft inclusionary	48.6 ft.	86.20%
146 2 AVENUE	58.12	105 ft inclusionary	46.88 ft.	80.70%
146 2 AVENUE	59.16	105 ft inclusionary	45.84 ft.	77.50%
146 2 AVENUE	57.56	105 ft inclusionary	47.44 ft.	82.40%
146 2 AVENUE	59.21	105 ft inclusionary	45.79 ft.	77.30%
152 2 AVENUE	36.91	105 ft inclusionary	68.09 ft.	184.50%
156 2 AVENUE	66.99	105 ft inclusionary	38.01 ft.	56.70%
Avenue B btw 10th & 11th Sts.				
159 AVENUE B	56.43	105 ft inclusionary	48.57 ft.	86.10%
159 AVENUE B	64.63	105 ft inclusionary	40.37 ft.	62.50%
165 AVENUE B	44.62	105 ft inclusionary	60.38 ft.	135.30%
167 AVENUE B	58.13	105 ft inclusionary	46.87 ft.	80.60%
169 AVENUE B	59.13	105 ft inclusionary	45.87 ft.	77.60%
171 AVENUE B	58.08	105 ft inclusionary	46.92 ft.	80.80%
173 AVENUE B	58.26	105 ft inclusionary	46.74 ft.	80.20%

Location	Current	Proposed	Difference	% Increase over existing bldg ht.
Avenue A btw 7th & 8th Sts.	building height	allowable height	(+ this much)	
125 AVENUE A	63.71	105 ft inclusionary	41.29 ft.	64.80%
123 AVENUE A	41.84	105 ft inclusionary	63.16 ft.	151%
121 AVENUE A	41.47	105 ft inclusionary	63.53 ft.	153.20%
119 AVENUE A	40.82	105 ft inclusionary	64.18 ft.	157.20%
117 AVENUE A	41.25	105 ft inclusionary	63.75 ft.	154.50%
115 AVENUE A	40.33	105 ft inclusionary	64.67 ft.	160.40%
113 AVENUE A	50.35	105 ft inclusionary	54.65 ft.	108.50%
111 AVENUE A	49.32	105 ft inclusionary	55.68 ft.	112.90%
111 AVENUE A	49.59	105 ft inclusionary	55.41 ft.	111.70%
Avenue B btw 3rd & 4th Sts.				
37 AVENUE B	48.46	105 ft inclusionary	56.54 ft.	116.70%
41 AVENUE B	69.85	105 ft inclusionary	35.15 ft.	50.30%
45 AVENUE B	32.64	105 ft inclusionary	72.36 ft.	221.70%
45 AVENUE B	32.81	105 ft inclusionary	72.19 ft.	220%
49 AVENUE B	34.64	105 ft inclusionary	70.36 ft.	203.10%
51 AVENUE B	33.99	105 ft inclusionary	71.01 ft.	208.90%
53 AVENUE B	66.59	105 ft inclusionary	38.41 ft.	57.70%
Avenue C btw 10th & 11th Sts.				
175 AVENUE C	47.87	105 ft inclusionary	57.13 ft.	119.30%
173 AVENUE C	57.7	105 ft inclusionary	47.3 ft.	82%
171 AVENUE C	58.7	105 ft inclusionary	46.3 ft.	78.90%
169 AVENUE C	53.86	105 ft inclusionary	51.14 ft.	94.90%
167 AVENUE C	53.86	105 ft inclusionary	51.14 ft.	94.90%
165 AVENUE C	53.84	105 ft inclusionary	51.16 ft.	95%
163 AVENUE C	54.84	105 ft inclusionary	50.16 ft.	91.50%
First Avenue btw 12th & 13th Sts.				
215 1 AVENUE	57.98	105 ft inclusionary	47.02 ft.	81.10%
215 1 AVENUE	54.95	105 ft inclusionary	50.05 ft.	91.10%
213 1 AVENUE	54.11	105 ft inclusionary	50.89 ft.	94%
209 1 AVENUE	41.39	105 ft inclusionary	63.61 ft.	153.70%
207 1 AVENUE	29.63	105 ft inclusionary	75.37 ft.	254.40%
205 1 AVENUE	39.97	105 ft inclusionary	65.03 ft.	162.70%
203 1 AVENUE	39.64	105 ft inclusionary	65.36 ft.	164.90%
201 1 AVENUE	39.68	105 ft inclusionary	65.32 ft.	164.60%
199 1 AVENUE	39.54	105 ft inclusionary	65.46 ft.	165.60%
197 1 AVENUE	38.22	105 ft inclusionary	66.78 ft.	174.70%



THE ADVOCATE FOR NEW YORK CITY'S HISTORIC NEIGHBORHOODS

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tel (212) 614-9107 fax (212) 614-9127 email hdc@hdc.org

December 16, 2015

Statement of the Historic Districts Council

City Planning Commission

Zoning for Quality & Affordability; Mandatory Inclusionary Housing Public Hearing

The Historic Districts Council is the citywide advocate for New York's historic neighborhoods. We represent over 500 neighborhood-based group dedicated to preserving the physical character of their communities. Many of our constituents have spent years working with property owners, Community Boards, City Planning and elected officials to enact appropriate zoning in order to better protect the character of their neighborhoods and encourage new development which enhances where they call home. It is on their behalf that we address our very strong concerns about these proposed citywide zoning text amendments.

HDC echoes the numerous civic organizations and community boards citywide in our opposition to Zoning for Quality and Affordability (ZQA). There is no panacea for New York's affordable housing crisis, and ZQA is not even a cure for its symptoms. Rather, it seems that ZQA is a concession to developers to sweeten Mandatory Inclusionary Housing (MIH). MIH is the only part of this proposal which will might actually provide "affordable" units. In exchange for this oversight on development, ZQA is being offered as an olive branch to the real estate industry. It loosens the entire city's existing zoning to allow greater density for market-rate development, under the guise of creating affordable units, which, as we all know, is optional. The provisions for seniors have an expiration date, which ultimately will be converted to more market rate housing. While MIH is self-explanatory in title, ZQA is a wholesale upzoning of the entire city, and will not guarantee either goal of affordability or quality.

The notion that the City can only house people by relying on private investment with a market component lacks vision, while providing ZQA as relief for MIH is apologetic. HDC and civic leaders are grappling with what public good ZQA will actually provide, as an all-borough rezoning raises red flags, and is extremely rare. Further, MIH's success is contingent on a massive upzoning on par with urban renewal, again as a plea to developers. This formula works under the assumption that affordable construction in New York will halt unless 200% bigger buildings with meager inclusionary units is the deal. In a housing crisis, why not demand 100% affordable within a human-scaled neighborhood?

This amendment as it is proposed, is a wholesale upzoning of all five boroughs. It arbitrarily raises height limits and diminishes yard requirements across the board according to a mathematical nicety, not based in the actual built fabric of our city's neighborhoods. Contextual zones came to fruition after years of effort by community-driven, carefully examined, neighborhood-specific studies. New York thrives because of the diversity of its neighborhoods, yet this proposal's approach will deal with each neighborhood as the same, with a one-size-fits-all approach. A calculation of potential growth based on a model is not the same as actual development, especially when one considers the diversity of New York's built environment.. This potential impact on these properties must be studied carefully before being executed.

The Mayor's administrative priority of our City's housing crisis has been stated as two-fold: the creation and the preservation of affordable units. Thus far, the only push has been for creation, calling for a text amendment which will re-write our neighborhoods. There is a piece missing from this affordable housing armature, which is the preservation of units. ZQA might incentivize demolition of existing housing in order to replace it with new development utilizing the proposed as-of-right height limits. The success of MIH, as proposed, is dependent on upzoning, which encourage the demolition of existing building stock. Nearly half (47%) of all housing in New York City is rent regulated, which translates to approximately 1,025,000 units. Where is the plan for the preservation of these units? Smaller buildings which are 100% rent regulated should be identified and spared from ZQA, which could replace them with taller buildings with a 20% affordable component. Bigger buildings do not equal lower rents, if that were the case, West 57th Street would be Manhattan's newest neighborhood for the middle class.

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**REZONED EAST HARLEM =
LOSS OF AFFORDABLE HOUSING**

A 10-point plan for the De Blasio Administration
to preserve rent stabilized housing.

REZONING IN EAST HARLEM

As part of his “Housing NY: A Five-Borough, Ten-Year Plan,” Mayor De Blasio is planning to rezone East Harlem. Throughout the spring, summer and early fall of 2015, Movement for Justice in El Barrio organized broad community consultations in East Harlem through a series of community-wide meetings and workshops to understand, analyze and discuss this planned rezoning of East Harlem.

A primary concern raised through this community consultation process has been the likely displacement of long-time low-income community residents as a result of rezoning. Community members came out clearly against a rezoning plan where 70-75% of all new units will be market-rate, luxury housing. This, community residents argue, would be more aptly named a Luxury Housing Plan, not an Affordable Housing Plan. The thousands of market-rate, luxury apartments created in our community if the proposed rezoning plan goes through will lead to displacement of long term low-income tenants. These new luxury units and their market rate rents and higher income residents will put pressure on long term low-income tenants and small local businesses that contribute to the fabric and culture of El Barrio. Low-income tenants and small businesses will be priced out of their homes and communities.

In addition, the units set aside as “affordable” are not within reach for the current residents of East Harlem. In the plan, for the 25-30% of units set aside as “affordable,” the average income eligibility level ranges from \$46,620 to \$62,150 for a family of three – well above \$33,600 the East Harlem AMI for a family of four. Residents argue that these units designated as

RECOMMENDATIONS

We call on Mayor De Blasio to take strong action in favor of preserving rent-regulated housing. While the Mayor's "Housing New York" plan claims that "rent-stabilized apartments are a critical component of the City's affordable housing stock," the City's low income residents need a community-driven plan that will indeed preserve rent-stabilized housing units. Here we have a ten point community-generated plan to preserve affordable housing in East Harlem and citywide: Based on surveys, one-on-one conversations with hundreds of residents, group discussions, and community meetings, we have developed these recommendations for real, lasting changes at Mayor De Blasio's agency tasked with preservation, the Department of Housing Preservation and Development, HPD. These are changes that the residents of New York City's low-income, people of color and immigrant communities need and deserve.

1. Provide true, independent citywide oversight of HPD's performance. It is of the highest importance that enforcement mechanisms are put into place to ensure HPD's execution of these recommendations and their regular duties.

- Create an Independent Citywide HPD Oversight Commission with the power to investigate HPD, in order to ensure that HPD carries out these recommendations as well as their responsibilities to enforce the maintenance code and improve the quality of affordable housing.
- Community based housing and tenants' rights organizations will have input on the selection of the Independent Citywide HPD Oversight Commission members.

- Have HPD make regular reports to the Independent Citywide HPD Oversight Commission regarding their execution of these recommendations, housing code enforcement and the improvement of the quality of affordable housing.
- Establish a citywide hotline where tenants can lodge complaints with the Independent Citywide HPD Oversight Commission about problems with HPD.

2. Mount a citywide public education initiative about HPD's responsibility to safeguard quality, affordable housing.

- Publicize the 311 hotline and HPD's role in addressing housing maintenance issues using public service advertisements across all five boroughs, including on subways, buses, bus shelters, inside subway stations, newspaper ads, TV commercials, commercials on taxi TVs, billboards, radio spots, in hospitals and other readily visible public locations.
- HPD should have community outreach workers distribute multi-lingual, easy-to-understand literature about their role in addressing housing maintenance issues in El Barrio and similar neighborhoods in all 5 boroughs. Materials should publicize the 311 hotline where tenants lodge complaints regarding housing code violations.
- Consolidate all information about HPD on one web location and publicize this webpage in HPD Public Education Initiative materials and advertisements.

3. Establish an administrative tribunal to assess and collect fines for code violations, and/or grant inspectors the power to write citations against owners which must be paid immediately upon finding violations left unrepaired during a reinspection.

4. Fulfill the responsibility of the Emergency Repair Program.

- HPD must make all emergency repairs not completed by the landlord in the designated amount of time and bill the landlord.
- Mount a special public education promotion during heat and hot water season advertising the ERP's role and budget for addressing heat and hot water violations, and publicizing the 311 hotline where tenants can lodge their heat and hot water complaints. Utilize public service advertisements across all five boroughs including print, television and radio commercials and posters in readily visible public locations.
- Hire community outreach workers to carry out this special public education promotion and publicize the ERP's role for addressing heat and hot water violations and the 311 hotline in low income neighborhoods in all 5 boroughs.

5. Improve the quality of language-access for tenants receiving inspections.

- Inspectors must carry violation notifications in all available languages with them at all times.
- Printed violation reports which are mailed to tenants must be provided in the tenant's primary language.

6. Improve response to emergency violations.

- Landlords must be required to make repairs within 24 hours for emergency violations (except lead-based paint and window guards). Inspectors must be dispatched immediately and must notify landlords immediately in person, by phone or by email.

- Dispatch inspectors in less than 24 hours in cases of lack of heat or hot water.
- Promptly fine owners when heat or hot water is not restored within 24 hours.
- Assign special emergency inspectors.

7. Establish an East Harlem-HPD Housing Justice Program that can serve as a Pilot Program to be replicated in other similar areas with sub-standard housing at risk of worsening housing conditions and displacement.

- Establish an East Harlem HPD Oversight Team composed of members of local tenants' associations to review HPD's performance in East Harlem. (See Recommendation 8).
- Establish an East Harlem HPD liaison who will take complaints lodged collectively by tenants' associations.
- Community outreach workers who carry out the HPD Public Education Initiative in East Harlem will report to the East Harlem HPD Oversight Team so the Team can measure the overall effectiveness of the program.

8. Establish community-based oversight of HPD's performance in East Harlem.

- Create the aforementioned East Harlem HPD Oversight Team composed of members of local tenants' associations to review HPD's performance in East Harlem.
- The East Harlem HPD Oversight Team will oversee HPD's performance in terms of: i) Housing code enforcement in East Harlem and ii) The implementation and effectiveness of the HPD Public Education Initiative.

- The East Harlem HPD Oversight Team will review for approval all materials that HPD provides to tenants as part of the HPD Public Education Initiative. • HPD will provide written reports to the East Harlem HPD Oversight Team on housing complaints, inspections and code enforcement in East Harlem every 6 months.

9. Improve the inspection process.

- Provide inspections 24 hours a day, 7 days a week.
- Increase the number of HPD inspectors.
- Give inspection appointments with date and time to everyone who lodges a maintenance complaint so that residents suffering in poor housing conditions can make arrangements so that their apartments can be inspected.
- Inspectors to provide all tenants with a written result of the inspection in the language that the tenant can understand signed as proof of inspection with the date and time of the inspection.
- For non-emergency complaints, send tenants written notification of inspections with exact time and date at least 24 hours prior to the inspection.

10. Improve HPD follow up on unresolved violations.

- Guarantee HPD call-backs to tenants to find out if violations have been repaired.

**STATEMENT OF MICHAEL T. SILLERMAN
TO THE NEW YORK CITY PLANNING COMMISSION
REGARDING ZONING FOR QUALITY AND AFFORDABILITY**

*** * * * ***

DECEMBER 16, 2015

MR. CHAIRMAN AND COMMISSIONERS, GOOD MORNING. MY NAME IS MICHAEL T. SILLERMAN. I AM CO-CHAIR OF KRAMER LEVIN'S LAND USE DEPARTMENT WITH OVER 30 YEARS OF EXPERIENCE IN WORKING WITH THE ZONING RESOLUTION.

I AM HERE TODAY TO SPEAK, FOR MYSELF AND MY COLLEAGUES, IN SUPPORT OF THE ZONING FOR QUALITY AND AFFORDABILITY TEXT CHANGES. MANY OF THESE AMENDMENTS ARE SALUTARY AND LONG OVERDUE UPDATES TO REGULATIONS THAT HAVE HAD THE UNINTENDED EFFECT OF FRUSTRATING SENSIBLE BUILDING DESIGN AND APARTMENT QUALITY. OTHERS WILL BE INVALUABLE IN FACILITATING THE CONSTRUCTION AND DELIVERY OF NEW HOUSING GENERALLY. STILL OTHERS ARE NEEDED TO CHANGE PROVISIONS OF THE ZONING RESOLUTION THAT TODAY ACTIVELY FRUSTRATE THE CREATION OF AFFORDABLE HOUSING. MORE SPECIFICALLY:

- THE CHANGES TO BULK REGULATIONS – COURTS, MINIMUM DISTANCES BETWEEN BUILDING, REAR SETBACKS AND CORNER LOT COVERAGE IN HIGHER DENSITY DISTRICTS – ALL ELIMINATE

UNNECESSARY RESTRICTIONS OR COMPLEXITY FROM THE DEVELOPMENT OF NEW HOUSING.

- NEW RULES FOR SHALLOW INTERIOR LOTS AND THE PROPOSED BOARD OF STANDARDS AND APPEALS SPECIAL PERMIT FOR IRREGULAR SITES OFFER MEASURED RELIEF THAT WILL MAKE NEW SITES AVAILABLE FOR DEVELOPMENT.
- THE NEW DEFINITIONS OF LONG TERM CARE FACILITIES WILL FACILITATE A WIDER RANGE OF HOUSING TYPES – SOMETHING ESPECIALLY HELPFUL TO THE CITY'S AGING POPULATION.

WE SEE NO REASON WHY ANY OF THESE CHANGES SHOULD BE CONTROVERSIAL.

THE BALANCE OF THE PROPOSED AMENDMENTS RECOGNIZE THE CHANGES IN NEW YORK CITY'S DEMOGRAPHICS AND THE PHYSICAL AND ECONOMIC IMPERATIVES OF BUILDING HOUSING THAT IS AFFORDABLE TO THE FULL RANGE OF THE CITY'S POPULATION. THE CHANGES TO DENSITY CONTROLS ACKNOWLEDGE THAT AN INCREASING SHARE OF THE CITY'S HOUSEHOLDS ARE MADE UP OF SINGLES. THE REDUCTION IN PARKING REQUIREMENTS AND THE HEIGHT INCREASES ARE BOTH CAREFULLY TARGETED TO AFFORDABLE UNITS AND WILL NOT BE AVAILABLE GENERALLY. THE PARKING CHANGES ARE NEEDED BECAUSE PARKING DEMAND FROM

AFFORDABLE UNITS IS LESS THAN MARKET RATE UNITS; BUILDING UNNECESSARY PARKING SPACES RAISES THE COST OF AFFORDABLE HOUSING WITHOUT ANY CORRESPONDING SOCIAL BENEFIT. THE HEIGHT INCREASES ARE NEEDED BECAUSE, QUITE SIMPLY, THE CONTEXTUAL ENVELOPES ARE TOO SMALL TO ACCOMMODATE THE ADDITIONAL FLOOR AREA WHICH PROVIDES BOTH THE ECONOMIC SUPPORT AND THE SPACE ITSELF FOR THE AFFORDABLE UNITS.

THE ZONING AMENDMENTS ARE AN IMPORTANT STEP TOWARD PROVIDING THE WHOLE CITY WITH DECENT AND AFFORDABLE HOUSING. WHILE WE IN THE INDUSTRY WISH THAT THESE AMENDMENTS HAD GONE FARTHER, WE RESPECT THE BALANCE BETWEEN INDUSTRY AND COMMUNITY CONCERNS THAT THE DEPARTMENT OF CITY PLANNING HAS STRUCK. WE URGE YOU TO APPROVE THIS TEXT.

THANK YOU.

LANDMARK WEST!

THE COMMITTEE TO PRESERVE THE UPPER WESTSIDE

December 10, 2015

Hon. Carl Weisbrod, Chair
New York City Planning Commission
120 Broadway, 31st Floor
New York, NY 10271

OFFICE OF THE
CHAIRPERSON

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Dear Chair Weisbrod:

Based on careful consideration of the proposed “Zoning for Quality & Affordability” and “Mandatory Inclusionary Housing” zoning text amendments, LANDMARK WEST! believes that they do not represent sound planning policy for our city and its neighborhoods. In short, these two plans, if approved, will undo zoning protections that make our neighborhoods livable; they will not deliver the much-needed affordable housing they claim; and in fact they will promote the demolition of existing buildings containing affordable housing.

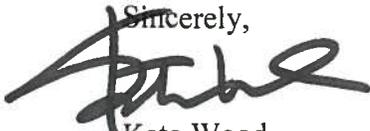
Therefore, together with the many community boards, civic organizations and citizens across New York who share our concerns, and on behalf of our Upper West Side constituents who would be disproportionately impacted, we urge you to withdraw these zoning text amendments.

Our position is grounded, in part, on a recent study of the two proposals performed at our request by BFJ Planning (BFJ), experts with long-standing expertise in these issues, both in New York City and other cities across the country. A copy of their full critique is enclosed.

The serious issues raised by BFJ have been reinforced in public discussions about ZQA and MIH in many communities throughout the city. The creation and preservation of affordable housing deserves thoughtful analysis, both at a policy level and case-by-case community level, through a deliberative planning process. It cannot be resolved or improved in a rushed citywide text amendment procedure. Attempting to do so will result in more harm than good.

We would be happy to arrange a meeting with BFJ Planning to discuss these concerns with you in detail. Thank you for your close attention to this issue.

Sincerely,



Kate Wood
President

cc. Kenneth J. Knuckles, Vice Chairman
Rayann Besser, Commissioner
Irwin C. Cantor, Commissioner
Alfred C. Cerullo, III, Commissioner
Cheryl Cohen Efron, Commissioner

Michelle de la Uz, Commissioner
Joseph Douek, Commissioner
Richard W. Eaddy, Commissioner
Anna Hayes Levin, Commissioner
Orlando Marin, Commissioner
Larisa Ortiz, Commissioner

29123



November 20, 2015

BFJ Planning

LANDMARK WEST!

INITIAL COMMENTS ON ZONING FOR QUALITY AND AFFORDABILITY (ZQA)

LANDMARK WEST!

INITIAL COMMENTS ON ZONING FOR
QUALITY AND AFFORDABILITY (ZQA)

LANDMARK WEST!

45 West 67th Street, New York, NY 10023

Kate Wood, President

**Prepared with the technical and graphic assistance
of:**

BFJ Planning

115 Fifth Avenue, New York, NY 10003

November 20, 2015

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LANDMARK WEST!

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November 20, 2015

LANDMARK WEST!

Initial Comments on Zoning for Quality and Affordability

1. Introduction

The Department of City Planning (DCP) recently proposed "Zoning for Quality and Affordability," with the stated goal to "modernize the Zoning Resolution to better promote housing affordability and higher quality buildings." In this initiative, DCP proposes to raise zoning height and FAR utilization regulations through a series of "updates and refinements," which will affect the built and historic character of the Upper West Side.

This report contains preliminary issues of concern to LANDMARK WEST! based upon initial discussions of the City's proposals. These issues arise from both the text from the ZQA and the text of the Mandatory Inclusionary Housing (MIH) proposal.

Both of these pieces of legislation are in a state of flux. How can the public be expected to offer cogent criticism or even engage in effective analysis of something that is a moving target?

Further, there is no legal or legislative requirement that the ZQA and the MIH be passed in their current forms as a total package. The proposed changes in the ZQA are not all tied specifically to the provision of affordable housing. This will be dependent on implementation of the MIH provisions. There are certain legal concerns about the package of exactions represented by the requirement of affordable housing, which may further complicate the passage of MIH. The ZQA could be enacted while the MIH languishes or undergoes a rewrite.

There is a concern that ZQA will incentivize the demolition of buildings that now provide affordable housing. There does not seem to be a requirement that existing affordable units be replaced in kind.

Additionally, this report points out the lack of any comprehensive planning on the City's part. Zoning seems to be the sum total of the "planning" that has been done. Based on discussions initiated by Planning staff most, if not all, of the changes were initiated by complaints raised by developers. Much is made of the "mapping" triggers in the legislation. Unfortunately for the public many of changes will be triggered by private applications or applications made by the City in response to private approaches by developers.

2. Approvals Process

The actual text of the Zoning for Quality Housing and Affordability and the text for the Mandatory Inclusionary Housing amendments only became available in September. On September 18th the Department of City Planning certified a generic environmental impact statement (GEIS) for ZQA and issued a negative declaration on the MIH. The zoning text amendments raise serious concerns with process:

- a. The abbreviated timeline for approval
- b. The initiative itself is city-wide and raises the question of whether "one size fits all"
- c. How will ZQA and MIH be linked?

These issues speak to the speed and nature of the City's effort to approve both ZQA and MIH as quickly as possible, and outside of a deliberative planning process that considers what the actual impacts might be on individual neighborhoods. Because the proposals include only text amendments to the Zoning Ordinance, which technically do not require a ULURP review, it falls to the City to define the length of the approvals process. Presently, the City has proposed a very short timeline of six months, which provides insufficient time for meaningful discussion and evaluation of the proposal and potential impacts.

Beyond the timeline, DCP has provided very little in-depth analysis on those impacts so that they might be fully understood. Both ZQA and MIH affect the whole city and raise the question as to whether a more deliberative process could be developed for such an important zoning initiative.

The second issue is related in that the proposals seem to treat various distinct neighborhoods of the city with the same approach as if "one size fits all." There are significant differences in the different boroughs of the city and within each borough. The City's one-size-fits-all approach for implementation of ZQA neglects the importance of community planning and relies primarily on expanding building capacity within the current zoning framework. Within this framework, the Upper West Side is a neighborhood that will be more greatly impacted by these proposals than others.

While ZQA provides the height and density increases, MIH will provide the details of how affordable housing will be carried out. The market and financial study for MIH was just published at the end of September. There are many unanswered questions on MIH in terms of its implementation and possible legal challenges. The details of MIH and the interrelationship of the two related efforts are undeveloped.

The impact of these changes will affect more than the height or bulk of buildings. It will ultimately result in new development that could eliminate existing affordable housing and small businesses through rising rents. This change in the commercial mix will have an impact on quality of life.

A single large project could be subjected to more far-ranging public review than what has been billed by the Administration as the most ambitious affordable housing plan in the nation. It would seem not only prudent but good government to engage in more careful analysis of these proposals rather than to discover that many unintended consequences have resulted.

3. Need for Community Plans

One method to ensure that ZQA is appropriately applied to site-specific conditions is for Manhattan Community Board 7 and the City to create a 197-a Plan. Such a plan should include an urban design element in order to provide a three dimensional context for the vision set forth by the community. This would also provide something on which proposed (and future) zoning changes could be based (and physically understood).

For CB7, a 197-a Plan would allow the Upper West Side communities to engage in a participatory planning process and reach consensus on a wide variety of issues related to planning and zoning. This would allow citizens to identify the conditions that differentiate it from other areas in the city, and set forth a vision of how ZQA and future zoning changes might best be implemented to encourage affordable housing while preserving community character. In fact, this is how planning and zoning are supposed to work: a plan sets forth a vision and the zoning helps implement that vision.

Presently, the City's one-size-fits-all approach for implementation of ZQA neglects the importance of community planning, and relies primarily on expanding building capacity within the current zoning framework. The City's goal to expand affordable housing opportunity requires more forethought and consideration for extant community conditions, or ZQA and MIH could result in negative impacts to other dimensions of the urban built environment and on the quality of life of residents. Without a deliberative planning process, creative solutions that might balance or creatively ameliorate these competing values, which vary by neighborhood, will not be found.

A 197-a Plan would, of course, take time; something the City has provided little of in its urgency to adopt ZQA and MIH. How and where best to consider additional development or how FAR should be viewed generally with regard to affordable housing, or how and where bonuses for community facilities should be offered, are examples of issues that could be more effectively addressed through a robust community planning process than an across-the-board, rapidly implemented zoning change.

4. FAR is not an "Entitlement"

It is important to remember that zoning is intended to control development so as to protect the public interest. Bulk controls establish envelopes that protect neighborhood character, ensure light and air in the public realm of streets and parks, and keep buildings from crowding one another. Density controls (i.e. FAR) limit zoning floor area, and thereby the population to what is supportable by available infrastructure and services. New York City's original zoning resolution in 1916 controlled bulk through height and setback envelope controls; the city's current zoning dating from 1961 added density controls through FAR. These density controls were large enough to accommodate the permitted FAR without seriously constraining architectural variety. However, bonus FAR earned for public amenities, such as plazas and inclusionary housing, and exemptions from zoning floor area to encourage amenities within buildings, such as deductions for laundry rooms or mechanical space, have increased the amount of building to be fit within the envelope. The ZQA proposes to loosen bulk controls to allow amounts of FAR to be fully exploited. As such, these changes will legitimize the view that FAR is an entitlement rather than a limit on zoning floor area.

The case has yet to be made that FAR is an entitlement and that envelope controls should be relaxed to allow all possible zoning floor area and floor area deductions to be used in development. These important issues, and their implicit and logical outcomes, deserve community input, and should be discussed in a deliberative planning process, not resolved in a rushed text amendment procedure.

While commonly used, the community facilities "bonus" is a bit of a misnomer: this regulation is not, in fact, bonus zoning floor area. It provides higher allowable FAR and less restrictive lot coverage than that allowed in some height factor (i.e. non-contextual) districts. The result can be buildings that are noticeably larger than their neighbors. When contextual zoning districts were introduced in the 1980s it was recognized that uniform street walls and building heights required that all buildings in a contextual district have the same FAR regardless of their use, including those with community facilities. ZQA and MIH seem to be reintroducing the community facility "bonus" in contextual districts and increasing it in height factor districts. This leads to the relaxation of envelope controls and the introduction of differential permitted heights. The likely result would be new buildings that are inconsistent in scale with each other and with the built fabric of their neighborhood.

5. Density and Height Increases versus "Technical Changes"

DCP's ZQA proposes increases to maximum allowable building height to a variety of zoning districts in Community District 7 as shown in Table 1. For basic residential height changes, the proposed increases are in the range of five or ten feet in all instances except in the R8 districts, where DCP proposes increases of 20 or 25 feet. In other areas of ZQA, including inclusionary housing areas and for projects that include affordable senior housing and nursing home facilities, DCP proposes significant increases in height up to 40 feet, including FAR increases for senior housing and nursing homes.

DCP proposes to raise zoning height and FAR utilization regulations through a series of "updates and refinements," which could result in buildings standing up to more than 15 feet taller along their frontage with no protection for the historic character of neighborhoods across the five boroughs. Specifically, the ZQA proposed amendments would impact CD 7 with height and FAR increases that are far above "technical changes".

The ZQA proposed amendments are classified into the following three categories affecting building height and density: 1) basic residential height changes, 2) inclusionary housing area residential height changes, and 3) affordable senior housing and nursing homes' height and floor area changes. Proposed increases in basic residential height and FAR for all applicable zoning districts in CD7 are presented in Table 1. These are explained in detail below.

- a. **Basic residential height changes:** Basic residential height changes would apply to all residential development (including market rate housing) in moderate and high density zoning districts and their commercial equivalents. For CD7, in contextual districts, this amounts to increases in height of 5 feet in districts R8A and R10A (wide streets), and increases of 10 feet in R9A (narrow and wide streets) and R10A (narrow streets). In non-contextual (height factor) districts, this amounts to increases of 5 feet in R8 (wide streets) and R10 (wide streets), 10 feet in R9 (narrow and wide streets) and R10 (narrow street), and 20 feet in R8 (narrow street). These changes do not apply in the R8B district except in the case of qualifying ground floors, where heights would be increased by 5 feet.
- b. **Inclusionary Housing Areas' residential height changes:** These changes would provide more significant height increases than those proposed in the basic residential height

TABLE 1: Summary of Proposed Height and Density Changes for CD 8 (DCP ZQA Proposal)

Date: August 2015

Community District 7

Zoning District	Existing Max. Height (ft)	Proposed Max. Height (ft)	Proposed Height Increase (ft)	Proposed FAR Increase
Basic Residential Height Changes				
R8 (narrow)	105	125	20	—
R8 (wide)	120	125	5	—
R9 (narrow)	135	145	10	—
R9 (wide)	145	155	10	—
R10 (narrow)	185	195	10	—
R10 (wide)	210	215	5	—
R10A (narrow)	185	195	10	—
R10A (wide)	210	215	5	—
Inclusionary Housing Areas Height Changes				
R9A (narrow)	145	175	30	—
R9A (wide)	155	175	20	—
R10A (narrow)	195	235	40	—
R10A (wide)	215	235	20	—
Affordable Senior Housing and Long-term Senior Care Facilities (Nursing Homes)				
R7	—	—	—	1.57
R8	—	—	—	1.2
R8A	125	145	20	1.2
R9	—	—	—	0.48
R9A	145	175	30	0.98
R10A (narrow)	195	235	40	2
R10A (wide)	215	235	20	2

changes discussed above, but apply only to projects building inclusionary affordable housing in Inclusionary Housing Designated Areas (IHDAs). These proposed height increases involve no increase in FAR. Studies from both Citizen's Housing and Planning Council¹ and DCP² claim that greater building envelope capacity is needed to make inclusionary affordable housing more economically feasible for developers (i.e. take advantage of the optional bonus offered under the inclusionary housing program). ZQA proposes to increase allowable building height – i.e. expand the permissible building envelope – to allow for greater bulk only for inclusionary housing developments in designated moderate and high density zoning districts and their commercial equivalents. For CD7, this amounts to increases of 20 feet in Districts R9A (wide street) and R10A (wide streets), 30 feet in R9A (narrow streets) and 40 feet in R10A (narrow streets).

- How these proposed height increases in existing IHDAs might affect CD7 can be considered in the contextual R9-A zoning district that encompasses Broadway from West 97th Street to West 110th Street. This area was upzoned to R9-A with inclusionary provisions in 2007 through a process of careful thought and deliberative planning. It was this process that determined the appropriateness of this zoning designation, with its attendant Quality Housing requirement and a maximum building height of 135 on narrow streets and 145 feet on wide streets. The ZQA and MIH would now allow increases to these recently established building heights, raising them to 175 feet on both wide and narrow streets. The impacts this may have on the built character of the area, light and air to the streets, and general quality of life for residents remains unknown and cannot be determined with the information DCP has thus far provided, and deserves further careful study.

c. Affordable Senior Housing and Nursing Homes height and floor area changes

DCP claims that proposed increases in height and FAR for affordable senior housing, including long-term senior care facilities (nursing homes) are intended to encourage greater housing production and a wider variety of options for seniors. These changes would apply only to projects that include Affordable Independent Residences for Seniors (AIRS) and Long-Term Care Facilities (nursing homes) (LTCF) in R3 - R10 zoning districts and their commercial equivalents. However, the mechanism for policing these developments or guaranteeing that they remain "affordable senior housing" is unclear.

In summary, for CD7, this amounts to the following proposed increases in FAR and building heights.

- Proposed increases in FAR that average approximately 20 percent across all applicable zoning districts, ranging from a 0.48 increase in FAR in R9 districts to a 2.0 increase in FAR in R10 districts.

¹ Citizen's Planning and Housing Council. *The Building Envelope Conundrum*, June 2014.

² DCP's own studies found that, as a general rule, it is possible to utilize allotted floor area, but the resulting buildings tend to replicate "zoning diagram" buildings (i.e. blocky, flat façade buildings that hardly anyone finds attractive to look at or to live in). [Personal telephone conference with Frank Ruchala, Deputy Director, Zoning Division, NYC Department of City Planning (July 27, 2015)]

- Proposed increases in height of 20 feet in R8A, R9A (wide streets) and R10A (wide streets) districts, 30 feet in the R9A (narrow streets) district, and 40 feet in R10A (narrow streets).

Whereas DCP claims that some of these changes are “technical” and driven by construction techniques, in reality they also involve a range of substantial height and density increases. Substantial changes that affect building height and envelope configuration in contextually zoned areas could negatively affect the built and historic character of the Upper West Side.

6. Elimination of Difference between Wide and Narrow Streets

There are two noticeable aspects to DCP’s proposed height and FAR increases: 1) the more significant increases apply to high density R10A districts; and 2) all increases seek to yield identical heights on both wide and narrow streets. For example, in CD7 in the R8 district where the existing maximum allowable heights are 105 feet on narrow streets and 120 feet on wide streets, DCP proposes to increase the height on narrow streets by 20 feet and by five feet on wide streets. This effectively erases differences in allowable heights between these two street types. DCP’s ZQA proposal seeks to allow identical building heights on wide and narrow streets in several zoning districts, including the higher density R10A districts in designated inclusionary zoning areas and when projects include senior affordable housing and nursing homes. For example, in R10A districts where the existing maximum allowable height for narrow streets is 195 feet, DCP proposes a 40 feet height increase producing 235 feet tall buildings on narrow streets. R10A districts on wide streets are also proposed to have a 235 feet height limit after a 20 feet increase under the proposed amendment.

In our opinion, this would undermine what has been two long held principles of NYC zoning: (i) the consideration of street width as one of the important determining factors for building height in order to provide sufficient light and air to the sidewalk and surrounding buildings and (ii) that building should be similar in bulk regardless of use, and, therefore, should be opposed.

7. Encroachment in the Rear Yards

DCP proposes allowing ground-floor accessory residential amenity spaces to be located in the rear yard, where parking garages or community facilities are allowed today. This would allow encroachment into the rear yard with uses other than parking, which is permitted in R1 through R10 residential districts. Extensions of the buildings are not desirable as a matter of public health, safety and quality of life. Issues of concern include access to light and air, fire protection and amenity of open space to residents of apartment buildings.

Under ZQA, amenity spaces would be permitted to encroach in rear yards at ground level (up to a height of 15’) for affordable senior and long term senior care facilities (nursing homes) where these uses are permitted, and for affordable units in inclusionary zoning areas. In order to facilitate this allowance, several other standards would be amended, including daylight standards for laundry and recreation space to facilitate sky-lit spaces, and minimum distance between legal windows and lot lines. This raises important issues regarding quality of life, including:

- i. Loss of open space and access to rear yards for residents,
- ii. Impacts on neighboring properties, including the property owner's enjoyment through restriction of light and air, and also potential noise impacts,
- iii. Fire safety issues, and
- iv. Quality of the amenity space created, as it would be windowless.

8. Historic Districts

ZQA and MIH set proposed density and height changes on a collision course with not only contextual zoning district protections, but also landmark and historic district protections. Approximately 63 percent of CD 7 is mapped with historic districts. The majority of this mapped area occurs along Central Park West in the Upper West Side/Central Park West Historic District. Five smaller districts are located along Riverside Drive (including the West 71st Street Historic District, the West End-Collegiate Historic District (and Extension), the Riverside Drive-West 80th-81st Street Historic District, the Riverside-West End Historic District (and Extensions I and II), and the Riverside-West 105th Street Historic District). These districts, which contain some of the strongest examples of historic architecture in the city and urban residential architecture in the country, greatly add to our overall quality of life.

Under ZQA and MIH, proposed building density and height changes would be applicable to properties located in historic districts. The DCP has argued that historic districts and Landmarks will be protected from the impact of these changes by Landmarks Preservation Commission (LPC) review. However, because ZQA would loosen bulk controls in order to maximize FAR, there is concern that this sense of entitlement to FAR will overshadow other factors relating to the aesthetic, historic character and neighborhood quality of life in these districts. There is also concern as to whether the LPC has the capacity to effectively review additional new development in these substantial districts. The LPC would be burdened with review of new development driven by access to FAR that ZQA promotes as an entitlement. The result would be new development that competes with or subverts the protection of the historic character of the Upper West Side.

9. Related MIH Questions

Sliver Rules

The proposed ZQA zoning text exempts affordable housing from the Sliver Rules that limit the height of buildings or enlargements on lots that are less than 45 feet wide. It would add a paragraph #7 to Section 23-692 saying,

"The provisions of this Section shall not apply to #Quality Housing buildings# on #zoning lots# providing either #affordable housing# pursuant to the Inclusionary Housing Program, as set forth in Section 23-90, inclusive, or #affordable independent residences for seniors#, where at least 20 percent of the #floor area# of such #zoning lot# is allocated to such #use#."

This has two potentially adverse consequences:

- It will incentivize the demolition of existing, relatively small, residential buildings that contain dwelling units that are currently affordable without any protection for those existing affordable units and/or the tenants who live there;
- It will allow new, narrow, buildings that are significantly taller than their neighbors and out of character with their built context.

This change appears unlikely to significantly advance the goal of affordable housing, but it is likely to harm the goal of maintaining neighborhood character.

Board of Standards and Appeals

The proposed MIH zoning text includes a new special permit by the Board of Standards and Appeals that would allow the reduction in the amount of affordable housing included in a development. In drafting this new special permit, the DCP has eliminated two prongs (neighborhood character and uniqueness) of the 5 pronged standard for a waiver of the zoning regulations (Section 72-21). The proposed Section 73-624 says,

The Board of Standards and Appeals may permit a reduction in the amount of #affordable floor area# required on an #MIH zoning lot# or modify the income levels specified for #qualifying households# pursuant to paragraphs (d)(3)(i) through (d)(3)(iii) of Section 23-154 (Inclusionary Housing), or reduce the amount of a payment into the #affordable housing fund# required pursuant to paragraph (d)(3)(iv) of Section 23-154, provided that:

- (a) such requirements for #affordable housing# create an unnecessary hardship, with no reasonable possibility that a #development#, #enlargement#, or #conversion# on the #zoning lot# in strict compliance with the provisions of Section 23-90 (Inclusionary Housing), inclusive, will bring a reasonable return, and that a reduction or modification of these requirements is therefore necessary to enable the owner to realize a reasonable return from such #zoning lot#;
- (b) the unnecessary hardship claimed as a basis for such reduction or modification has not been created by the owner or by a predecessor in title; and
- (c) within the intent and purposes of Section 23-90 (Inclusionary Housing), the reduction or modification is the minimum necessary to afford relief.

There is concern that this special permit may lead to developments that enjoy the increased bulk and density provided for affordable housing developments without providing the affordable housing. This concern springs from the current track record of the BSA that approves the majority of all applications that come before it. The decision to exclude two of the existing prongs of the standard raises the additional concern that approvals will be made easier to obtain.

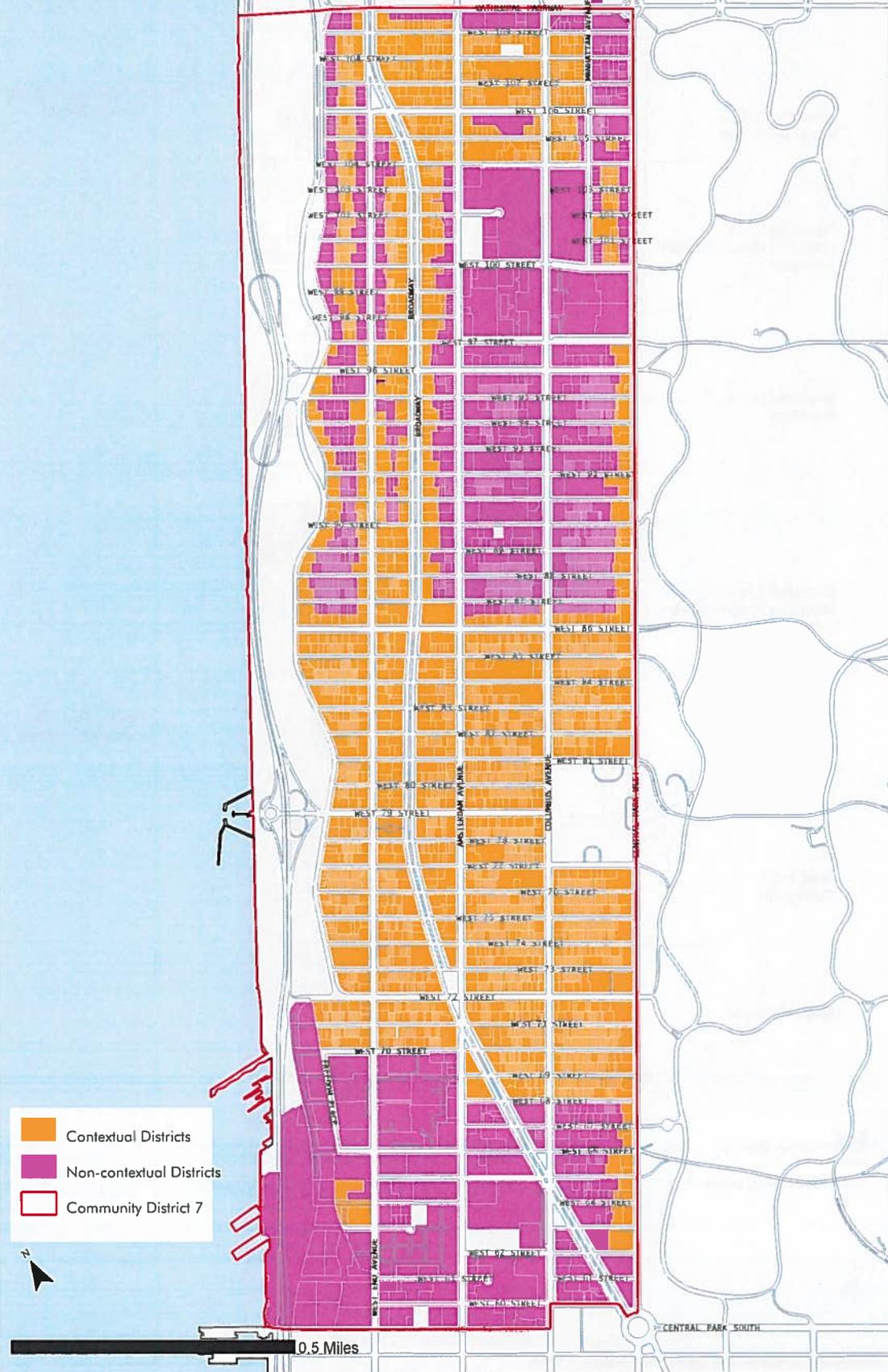
City Planning Commission

In section 72-32 the MIH text appears to give the Commission power to modify special permit applications that could allow increases in residential floor area. It allows the Commission to

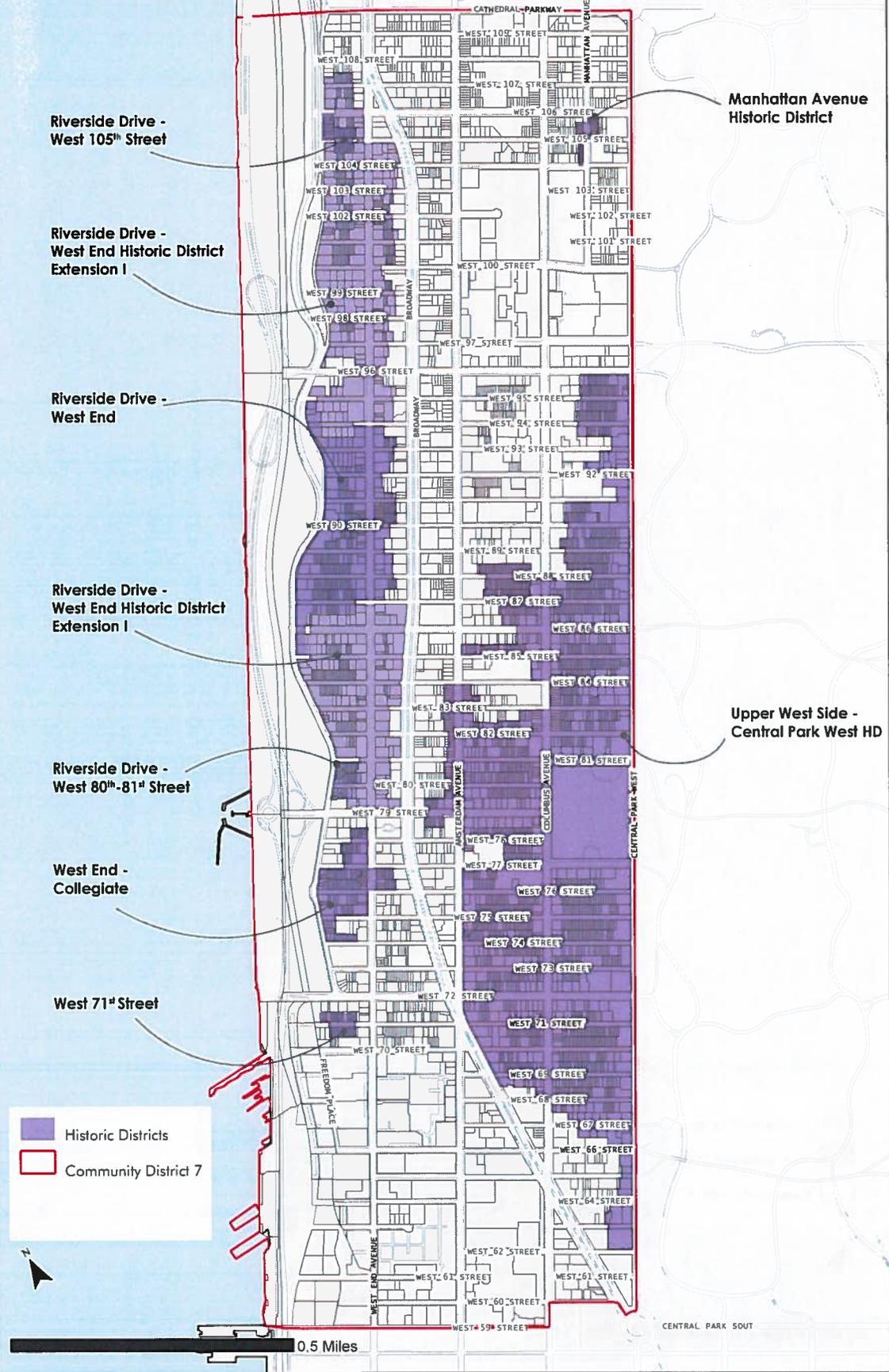
"establish appropriate terms and conditions for the granting of such special permit." This section 72-32 is not clear. It is another example of the moving target nature of this legislation.

These special permit provisions raise concerns about giving developers the opportunity to manipulate the system to gain height and FAR increases without delivering public benefit, particularly affordable housing.

CONTEXTUAL DISTRICTS



HISTORIC DISTRICTS



ACKNOWLEDGEMENTS

LANDMARK WEST!

INITIAL COMMENTS ON ZONING FOR
QUALITY AND AFFORDABILITY (ZQA)

LANDMARK WEST!

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November 20, 2015



THE COMMITTEE TO PRESERVE THE UPPER WEST SIDE

**Testimony of LANDMARK WEST!
Before the City Planning Commission
Re: Zoning for Quality and Affordability / Mandatory Inclusionary Housing
December 16, 2015**

LANDMARK WEST! is an award-winning non-profit working since 1985 to achieve landmark status for individual buildings and historic districts on the Upper West Side and to protect them from insensitive change and demolition. We are the proud curator of over 3,500 designated architectural and cultural landmarks from 59th to 110th Streets, Central Park to Riverside Park.

LW! is strongly opposed to the so-called “Zoning for Quality and Affordability” (ZQA) and “Mandatory Inclusionary Housing” (MIH). We base our position, in part, on a recent study of the two proposals performed at our request by BFJ Planning (BFJ), experts with long-standing expertise in these issues, both in New York City and other cities across the country.

We have submitted for the record a November 2, 2015, memo outlining preliminary areas of concern. Our starting focus was how these proposals related to Manhattan’s Upper West Side, a neighborhood that BFJ finds “will be more greatly impacted by these proposals than others.” ZQA in particular seems geared towards unlocking the development potential of neighborhoods, like ours, where residents have worked for decades to secure sound planning policies including contextual zoning and historic district designation to balance growth.

BFJ points out additional areas of concern with negative implications for communities across the city. Fundamental questions include:

- Why is the administration not pursuing a more deliberative process for a zoning initiative that purports to address the important issue of creating affordable housing? A single project would be subjected to more far-ranging public review than what has been billed by the Administration as the most ambitious plan in the nation.
- Both of these pieces of legislation are in a state of flux. How can the public be expected to offer cogent criticism or even engage in effective analysis of something that is a moving target?

Further, there is no legal or legislative requirement that the ZQA and the MIH be passed in their current forms as a total package. The proposed changes in the ZQA are not all tied specifically to the provision of affordable housing. This will be dependent on implementation of the MIH provisions. There are certain legal concerns about the package of extractions represented by the requirement of affordable housing, which may further complicate the passage of MIH. The ZQA could be enacted while the MIH languishes or undergoes a massive rewrite.

BFJ also expresses concern that ZQA will incentivize the demolition of buildings that now provide affordable housing. There does not seem to be a requirement that existing affordable units be replaced in kind.



Additionally, BFJ points out the lack of any comprehensive planning on the City's part. "One-size-fits-all" zoning text amendments seems to be the sum total of the "planning" that has been done.

Finally, it is important to remember that zoning is intended to control development so as to protect the public interest. ZQA proposes to loosen bulk controls to allegedly allow minor amounts of FAR to be fully exploited, legitimizing the view that FAR is an entitlement than a limit on zoning floor area. FAR is not an entitlement. Overemphasis on FAR sets up a destructive collision course between zoning and other land-use management tools such as landmarks preservation.

These are just some of the serious issues raised by BFJ and reinforced in public discussions about these proposals in many communities throughout the city. These important issues, and their implicit and logical outcomes, deserve community input, and should be discussed in a deliberative planning process, not resolved in a rushed text amendment procedure.

Our city is not for sale.

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December 16, 2015

Honorable Chair and Commissioners
New York City Planning Commission
120 Broadway, 31st Floor
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Re: Public Hearing December 16, 2015
Zoning for Quality and Affordability (N 160049 ZRY)

Dear Chair Weisbrod and Commissioners:

This testimony is offered on behalf of our client, Bedford Arms, LLC (“Bedford Arms”), in support of the parking provisions of the ZQA zoning text amendment. Bedford Arms, as the owner of a 78-unit Section 8 low-income apartment building at 1350 Bedford Avenue (Block 1205, Lot 28) in the Crown Heights neighborhood of Brooklyn, is working with the Department of City Planning in connection with a ULURP application for a zoning map amendment (to rezone from an R6A to an R7D district) and a zoning text amendment (to include the site in an inclusionary housing designated area). The actions are intended to facilitate, on the open area portion of the site (presently used for required parking), the development of a new 94-unit 100 percent affordable apartment building.

The parking provisions of ZQA, available to affordable housing developments in the Transit Zone, are essential to the viability of the Bedford Arms project.

- **Within an R7D district, without ZQA, Bedford Arms would be forced to create, within the new building, an excavated cellar level to accommodate a two-level 44-car parking garage (24 spaces for the new 94-unit building and 20 spaces for the existing 78-unit building).¹ The high cost of such excavation and construction will negatively affect the viability of the project and cannot be justified, given the low level of car ownership among low- and moderate-income tenants. None**

¹All 94 units in the new building, as well as the 78 units in the existing building, will be government assisted and therefore subject to the 25 percent parking required under ZR §25-25(e). The 20 spaces required for the existing 78 units represent a reduction from the existing 35 spaces required under the 1981 certificate of occupancy. Whether the zoning is changed to R7D or is kept R6A, parking for the existing 78-unit building may be reduced as-of-right to conform to current parking regulations.

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of the existing 35 parking spaces are used by the tenants of the existing building; and within the last several years no tenant has requested the use of a parking space. In addition, parking spaces are not needed since the site is well-served by mass transit and is within four-blocks walking distance of various shopping and services located on Fulton Street.

- **Under ZQA, no parking will be required for the income-restricted units in the new affordable building; and, as for accessory parking required for the remaining units and parking required for the existing building, special permits from Board of Standards and Appeals (“BSA”) would allow for a waiver or a reduction of any required parking, which would significantly reduce construction costs and, most important, reflect the low level of car ownership by existing and prospective tenants.**
 - For the 94-unit new affordable building, no parking will be required for the 47 units that are “income-restricted” (i.e., units for households earning less than 80% AMI).
 - The required 50 percent parking for the other 47 units in the new affordable building, which are moderate income (earning no higher than 125% AMI), may be waived or reduced pursuant to the proposed BSA special permit (ZR §73-433) available to a development or enlargement where at least 20 percent of the units are income-restricted. Under such special permit, the BSA may waive or reduce parking, based on findings relating to financial feasibility, traffic congestion and effects on the surrounding area.
 - The 20 accessory parking spaces required for the 78-unit existing building may be waived or reduced pursuant to the proposed BSA special permit (ZR §73-434) available to a building containing income-restricted housing units. Under such special permit, the existing parking spaces may be waived or reduced, provided findings are made that such waiver or reduction will facilitate an improved site plan; will not cause traffic congestion; and will not have undue adverse effects on the surrounding area.

We are confident that the required findings for the two BSA special permits can be made, given that:

- The existing accessory 35 parking spaces on the site, which are intended to serve the tenants of the Section 8 building, are not in fact utilized by the tenants.
- The site is within walking distance of three MTA subway lines, a Long Island Railroad station, and three MTA bus lines.

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- The site is within four-blocks walking distance of food stores and other essential services on Fulton Street.
- The required parking for both the new and existing buildings will need to be constructed in the lower level of the new building, significantly increasing overall construction costs and thereby challenging the economic viability of the project.

In conclusion, we respectfully request that the Commission approve the parking provisions of ZQA. As illustrated in this letter, the parking waivers and reductions available in ZQA are essential to the economic viability of new affordable housing developments.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Stuart Beckerman", written in a cursive style.

Stuart Beckerman

**TESTIMONY BEFORE THE NYC PLANNING COMMISSION ON
THE MANDATORY INCLUSIONARY HOUSING PROGRAM**

December 16, 2015

My name is Luis A. Henriquez Carrero, and I am a Deputy Director of the Housing Unit at Legal Services NYC (LSNYC), Brooklyn Program. LSNYC has a rich history of fighting poverty and seeking racial, social and economic justice for low-income New Yorkers. For over 45 years, we have challenged systemic injustice and helped clients meet basic needs for housing, access to high-quality education, health care, family stability, and income and economic security. Our neighborhood-based offices across the five boroughs service over 80,000 New Yorkers every year.

The current Administration has shown great concern for the creation and preservation of affordable housing and homelessness prevention. LSNYC applauds the Administration's efforts in this regard, particularly in the absence of support from the federal and state governments.

I am here to today to testify about one such initiative: the proposed Mandatory Inclusionary Housing program. This proposed zoning text amendment would mandate the creation of affordable housing wherever up-zoning development takes place. Under the proposal, the affordability requirement can be 25% at 60% of AMI or 30% at 80% of AMI. While we

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support the creation of permanently affordable housing units, the key question is whether said units are within the reach of low-income residents living in the rezoning neighborhoods. If they are not, the City's overall rezoning program (which includes MIH as well as various neighborhood-specific rezonings) has the potential of doing more harm than good, specifically as it pertains to speeding up the gentrification process.

We believe there are two main issues with the MIH program as currently proposed. First, the percentages for affordable housing mandated under the program are not sufficient to meet the demand in the communities that will likely see significant displacement resulting from the rezoning process itself. In East New York, for instance, the proposed rezoning has already resulted in the increase of property values, which primarily affects unregulated tenants but has an impact as well in the eventual deregulation of rent stabilized housing. Rents in the neighborhood are likely to continue increasing once the construction of thousands of new market rate units becomes a reality.

Second, as it stands the MIH program defines affordability based on citywide AMI levels. Median incomes in some of the City's poorer neighborhoods are significantly lower, however. Again taking East New York as an example, the citywide AMI for a family of three is \$46,620, whereas the same AMI in East New York is \$32,815. So, by design, many East New Yorkers do not stand to benefit from the current MIH program. This very month, the City Comptroller published a report that, in essence, concludes that in East New York the rezoning plan stands to produce far more market rate housing than affordable housing, and even the latter will remain out of reach of half of the area's low-income residents. Considering the size of the

unregulated housing stock in East New York, tenants forced out of these units will largely not be able to re-rent in the same neighborhood and will ultimately be displaced.

This is of great concern to our organization. In the past year, both LSNYC and the Legal Aid Society have received unprecedented City funding to increase our presence in the neighborhoods slated for rezoning through hiring new attorneys and partnering with community based organizations. We have already had an impact on thousands of low-income area residents, both through individual representation in housing court and through building-wide litigation and advocacy work. Unfortunately, our impact in these communities cannot extend to saving apartments for unregulated tenants who are lawfully taken to court once their leases expire. For this reason, we share the City Comptroller's view that the MIH program should result in the creation of affordable housing that is (1) sufficient in number to offset the displacement of low-income tenants from neighborhoods like East New York and Brownsville, and (2) within the economic reach of these families.

As an organization fighting day in and day out for low-income tenants living in the rezoning neighborhoods, we agree with the Administration's intention to promote and preserve affordable housing in these neighborhoods. We are deeply concerned, however, that this objective may not materialize based on the current MIH proposal. We are even more concerned that the unintended—yet foreseeable—result may be exacerbating gentrification pressures already at play. We see these pressures every day in our work.

Thank you.

CITY PLANNING COMMISSION HEARING – December 16, 2015

TESTIMONY

FROM: Lenox Road Block Association Alliance (LRBAA); Brooklyn NY

Re: Oppose the 'Zoning for Quality and Affordability' Plan

Communities and community boards across the city have rejected the 'Zoning for Quality & Affordability' proposal. This is a one-size-fits-all citywide zoning change that fails to take into account local conditions, goals, or desires, and eliminates the leverage that local communities, their Councilmember, and their Borough President would normally have over a local rezoning (as opposed to a citywide zoning text amendment such as this). It would also undo years of hard work by communities to achieve reasonable height limits that would help to preserve the character of their communities.

Perhaps worse, it purports to increase the quality and affordability of new developments with minimal impact upon neighborhood character. Unfortunately, none of this is true.

ZQA would not make our city's housing better or more affordable. It would only make it bigger and taller. ZQA would grant 5-20 foot height increases for market rate developments without any public benefit. It would grant much greater height increases (up to 25-50 feet and as much as 31%) for 80% market rate/20% 'affordable' developments. ZQA would also grant very generous bulk and height bonuses to developers for including just 20% 'senior affordable housing.

There is no evidence to support the claim that developers would be inclined to include 20% affordable developments because of ZQA provisions...On the contrary, there is evidence to contradict it. Also, many say that so-called affordable housing for seniors would be unaffordable to the seniors who need it most, and would only be required to remain senior affordable housing for 30 years.

WE URGE YOU TO OPPOSE THE 'ZONING FOR QUALITY AND AFFORDABILITY PLAN.

The Mandatory Inclusionary Housing (MIH) proposal would also, as proposed, potentially do more harm than good. The Mayor has said MIH would only be applied in cases where there is a significant increase in the amount of allowable market rate development. This means affordable housing will only be mandatory if and when a huge amount of new market rate housing will also be created. This is exactly what was done in areas of the city like West Chelsea/Hudson Yards and Williamsburg/Greenpoint. While some affordable housing was built, the flood of market rate housing pushed up prices and made these neighborhoods overall exponentially less affordable. And the scale and sense of place of these areas was totally destroyed.

Judy Spence, President (on behalf of the Executive Committee and Neighborhood Residents)

Lenox Road Block Association Alliance

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**City Planning Commission Public Hearing on MIH and ZQA
Carl Weisbrod, Chairman
Department of the NYC Planning Commission
Wednesday, December 16, 2015**

**Testimony by Bobbie Sackman, Director of Public Policy, LiveOn NY
in support of ZQA**

LiveOn NY is a non-profit organization that makes New York a better place to age by working on policy, advocacy and innovative programs. We have a membership base of 100 organizations that provide more than 800 community based programs, which range from individual community-based centers to large multi-service organizations. LiveOn NY's Affordable Senior Housing Coalition is comprised of 25 of the leading NYC non-profit senior housing providers. LiveOn NY's policy and advocacy work includes funding for community-based services, elder abuse, affordable housing, caregiver supports and other issues impacting older New Yorkers. We also run a robust outreach and enrollment program to assist older adults to access public benefits.

If there was available land to build affordable senior housing across the city, would you use it? There is. The key to using it is passing ZQA for independent senior buildings. LiveOn NY released, "[Paving the Way for New Senior Housing](#)", identifying feasible land that could house 2000 older New Yorkers. The city needs to a plan to move forward now. At a certain age, you can't wait.

Why are seniors constantly calling their Councilmembers and elected officials desperate for affordable housing? Older New Yorkers, the fastest growing demographic in NYC, will comprise an estimated 1.84 million New Yorkers by 2030. Senior households are smaller and poorer on average than the general population. About one in five older New Yorkers live in poverty (below \$11,170/year) with many surviving on Social Security alone.

How are seniors impacted by the housing affordability crisis? ***A shocking 65% of senior households living in rent regulated housing, including thousands on SCRIE, spend more than half their income on rent. For those in unregulated buildings the burden is greater.*** Insufficient affordable housing forces seniors to remain isolated in unsafe or inappropriate housing. This includes living on upper floors of walk ups or in spaces unable to accommodate a wheelchair.

Tens of thousands of seniors languish on waiting lists in Section 202 buildings for 5-10 years. There are waiting lists to get on the waiting list as the primary list is closed. There are no waiting lists for parking. The choice seems obvious.

Why is utilizing 202 parking lots one part of the solution to the affordable housing crisis? Land scarcity is the greatest challenge confronting senior housing providers. In the face of a dwindling stock of city-owned land and soaring acquisition costs, 202 parking lots are an untapped source of new land. The lots are owned by local non-profit housing providers mission driven to provide appropriately sized apartments ensuring senior independence.

Zoning changes would not require eliminating parking, but becomes a powerful option if it's in the best interest of the community's elders. Local non-profits have been an integral community partner for decades providing senior housing and services and are the organizations relied upon by local residents and elected officials.

What did the study, "[Paving the Way for New Senior Housing in NYC](#)" find? LiveOn NY's affordable senior housing coalition is comprised of leading NYC non-profit senior housing providers, operating 20,000 apartments. Their knowledge of the challenges in building affordable housing informed the study. **It is critical to understand that these parking lots can be used only by residents of the building.**

Based on carefully determined criteria, 39 lots were identified as potentially feasible sites located in all five boroughs. These sites could generate at least 2,000 new apartments. With tens of thousands on waiting lists, the potential to house 2,000 seniors cannot be ignored.

Will utilizing parking lot land for housing take away much needed parking spaces?

Simply put, no. A Department of City Planning analysis found extremely low car ownership rates among 202 building residents, at only 5 cars per 100 residents in areas near public transportation and 11 cars per 100 residents in areas further from transit.

Why is utilization so low? Many residents have incomes below \$15,000 and have aged in place and no longer drive. They are unable to maintain car ownership or have stopped driving. **There are waiting lists for apartments. There are no waiting lists for parking.** Non-profit managers provide vans to assist residents with their daily needs.

Why is ZQA necessary to move senior housing forward? **Without the enactment of ZQA, the parking lots will sit underutilized.** Non-profits will be unable to build housing. Outdated parking lot requirements no longer reflect the reality of demand. ZQA provides options for non-profits to build more housing. **It costs \$20,000-\$50,000 to develop one parking spot. That money could be used for additional apartments allowing the provider to go deeper into affordability.** Allowing for increased height of one or two floors provides more apartments and commercial space. It prevents apartments being on street level, a particularly unsafe practice after Hurricane Sandy.

Accessory amenities are a key component in the neighborhood development approach to keep seniors housed with services. **Seniors throughout the community could benefit from using smaller parking lots for medical facilities or senior centers. ZQA facilitates the co-location of services.**

How can the city "pave the way" for more senior housing? **By enacting ZQA, zoning regulations will be updated to meet the growing need in the coming years.** ZQA that allows for underutilized land – a scarcity in NYC – to house 2000 or more seniors is imperative.

If not, the final question is – what do you say to a senior desperate for affordable housing about why that lot is just sitting? Waiting is not an option.

Paving the Way for New Senior Housing



**Site Selection Survey of
HUD Parking Lots in New York City
May 2015**

LiveOn NY
Making New York a better place to age

Executive Summary

Older New Yorkers are the city's fastest growing demographic and will account for an estimated 20% of the population by 2030. Given this trend, the housing needs of an aging population should be among the most pressing concerns of New York City housing planners. In an era of increasing construction costs, declining stock of rent regulated housing and diminishing land resources, innovative strategies are needed now more than ever to meet the demands of the city's growing older adult population.

In 2014, Mayor de Blasio presented Housing New York, his administration's plan for 200,000 new and preserved affordable housing units over the next 10 years. The new plan expands financing programs and seeks to reduce barriers to senior housing production. A key component of the plan is the Zoning for Quality and Affordability initiative, released by the NYC Department of City Planning in February of this year. If adopted, the proposal would reduce parking requirements on new buildings and allow underutilized lots to be transformed into much needed affordable housing or other accessory uses such as congregate space and social services designed specifically for senior residents.

Paving the Way for Affordable Senior Housing in New York City the first comprehensive analysis and site selection survey portfolio of US Dept. of Housing & Urban Development (HUD) sponsored senior housing in New York City. The survey analyzes the 277 buildings and 191 accessory parking lots across the city with the ultimate aim of selecting feasible sites for new senior housing development.

Based on carefully determined criteria, 39 HUD accessory parking lots were selected and are profiled in the following pages. The selected sites can be found in all five boroughs with concentrations in the Bronx, Central and South Brooklyn and Eastern Queens. All of the lots are privately owned by non-profit housing providers with an inherent interest in expanding the stock of affordable senior housing with services.

Property profiles include relevant site data, a zoning map and photographs as well as notes on any special site conditions that could impact feasibility. The data sheets are designed as a guide for housing providers, advocates, city officials and developers as they consider the development potential of underutilized HUD accessory parking lots.

Together with the recommendations outlined in this report, and proposed changes under the Zoning for Quality and Affordability initiative, the sites selected here have the potential to generate at least **2,000** new units of much needed affordable housing, easing demand among our city's seniors and helping to reach the Mayor's goal of adding 200,000 new and preserved affordable housing units in New York City over the next 10 years.

Paving the Way for New Senior Housing

Opportunities to Build New Affordable Senior Housing and Add Community Resources in Your Neighborhood through Zoning for Quality and Affordability (ZQA)

In the case of Affordable Senior Housing, ZQA would allow Nonprofit Affordable Senior Housing Providers to...	Why it Matters to <u>Your</u> Community
<ul style="list-style-type: none">  Build <u>new senior housing</u> on existing underutilized parking lots to house the exponentially growing number of seniors citywide who desperately need housing, many who are sitting on a waitlist.  Build over 2000 new units of affordable senior housing. LiveOn NY's recent report <i>Paving the Way for New Senior Housing</i> identified 39 affordable senior housing lots that could support over 2000 new units of affordable senior housing. There are many other lots that could be developed for other uses to serve <u>the entire community</u>, including as social and health services, community gardens, and others.  Enrich their communities by more meaningfully using this existing land to build affordable senior housing.  Make use of feasible land they already own to build new affordable housing. 	<ul style="list-style-type: none">  There are waitlists for senior units in the tens of thousands, measured over years and even decades. City Council offices receive calls daily from seniors who need housing.  These underutilized lots are only for senior residents, so the community is not having a public lot "taken away."  Senior parking lots are underutilized. Car ownership at HUD 202 senior buildings is shockingly low at only 5 cars per 100 residents in areas well served by transit and only slightly higher at 11 cars per 100 residents in areas further from transit.¹  Off-street parking is expensive - an estimated \$20,000-\$50,000 per space to build.²  Policy should encourage our city's scarce housing subsidy land resources to be spent on <u>new</u> housing units for those who don't have a place to live, rather than unnecessary underutilized lots.
<ul style="list-style-type: none">  Build just a couple of stories taller in affordable senior housing buildings to meet the needs of older adults while still fitting in with the character of the neighborhood.  Allow common-sense flexibility in building senior housing to accommodate best practices for affordable construction and good design for affordable senior housing. 	<ul style="list-style-type: none">  This would allow nonprofit housing providers to build an elevator for seniors which is important because outdated zoning has isolated seniors in high level, unsafe walkups. As seniors age in place, it becomes unsafe for them to remain in their homes, risking isolation and other health issues, which could further strain city resources.  This added space would allow nonprofits build community-based services, such as a senior center, within the affordable housing building. These services are vital to allow seniors to age in place in their communities and keep them from entering the next, much more costly level of care (i.e. nursing home).  These new services would support the <u>entire community</u>, not just the residents.

¹ Department of City Planning (DCP).

² DCP Housing New York, *supra*.

Paving the Way for New Senior Housing

Opportunities to Build New Affordable Senior Housing and Add Community Resources in Your Neighborhood through Zoning for Quality and Affordability (ZQA)



Underutilized Parking Lot in Brooklyn
(one of the 39 feasible lots identified in Paving the Way)

VS.



New Affordable Senior Housing in Queens

Bottom Line:

**In the case of Affordable Senior Housing,
ZQA provides the opportunity for:**

-  More, and safer affordable senior housing;
-  Better use of city resources and land;
-  Development of community supports for seniors, their families and the entire community today and in the future.

*You hold the key to unlock the door to new affordable senior housing.
Your community cannot afford to miss this opportunity.
Please keep the door open.*



LOCAL INITIATIVES SUPPORT CORPORATION – NEW YORK CITY
501 Seventh Avenue 7th Floor, New York, NY 10018
Phone: 212-455-9584
eubiera@lisc.org
www.lisc.org/nyc

**Testimony on Zoning for Quality & Affordability
Hearing of the City Planning Commission**

Submitted December 16, 2015

Thank you Chairman Weisbrod and members of the Commission for the opportunity to speak here today on the City's proposed zoning proposals. My name is Edward Ubiera, Director of Policy for the Local Initiatives Support Corporation's New York City Program. I am submitting this written testimony on behalf of LISC New York City.

About LISC NYC

LISC NYC is dedicated to helping nonprofit, community development corporations (CDCs) and locally-based organizations transform distressed neighborhoods into sustainable communities of choice and opportunity with good places to work, to do business and raise children. Over the last 35 years, LISC NYC and its affiliates have invested over \$2 billion which has leveraged over \$5 billion for low- and moderate-income communities across New York City. This has resulted in over 36,000 units of affordable housing and 2 million square feet of retail and community space.

LISC's role in Affordable Housing

In partnership with local CDCs, the preservation and development of affordable housing has been and continues to be at the core of our work. Our platform of technical assistance and lending products and our role as a thought partner with local government stakeholders were key in providing CDCs the tools and capacity needed to transform neighborhoods during an era of disinvestment and abandonment. However, we are facing a different set of problems today stemming from a crisis in housing affordability and a crisis in supply. As this commission is aware, more than 50% of households in New York City are cost burdened. There is also insufficient housing supply for extremely low and very low-income households.

We Support ZQA

LISC NYC believes that the citywide “Zoning for Quality & Affordability” is a thoughtful and modest proposal that will make it possible for mission-oriented developers to design and build more attractive—and most importantly more affordable—housing. By our analysis, when approved and implemented, ZQA will not compromise the character of the livable, mixed use, and contextually zoned neighborhoods we have grown to love.

We agree with the core elements of the proposal that will modernize design guidelines and allow for increased density. For years, our partner CDCs have faced many challenges in applying the current zoning rules to their affordable housing projects. ZQA offers some common sense changes that will make it easier to design and build on irregular sites without having to get special approvals that require extra time and cost. Also, the addition of ceiling height to

ground floors will facilitate the development of more viable commercial spaces, especially for mom-and-pop stores that add street vitality.

We understand that much of the opposition to ZQA has come from advocates who are concerned about the changes to parking requirements. However, we urge you to weigh the feedback coming from affordable housing providers who know the issues very well. We support the ZQA provision that makes parking requirements optional for new affordable and senior housing. We also believe it makes sense to allow existing senior housing developments with underutilized parking spots to convert them to either additional housing, open space, or other community amenities. Parking spaces are expensive and especially difficult to justify given the low levels of auto ownership by many residents of senior housing and affordable housing. However, we urge the City to make sure that public transport in designated “Transit Zones” is sufficient when additional units are added to a neighborhood. CDCs who build housing understand the transportation needs of their neighborhoods, and we are confident that they will be able to weigh these needs as they make design choices with the additional flexibility provided by ZQA.

Mandatory Inclusionary Zoning

A key element of New York’s Housing Plan is the proposal to establish a Mandatory Inclusionary Housing policy—the first ever in NYC. In concept, we are supportive of policy efforts like MIH that seek to increase the supply of affordable housing, and harness market forces to deliver affordable units mostly without subsidy. Since MIH was proposed in September 2015, we have been in regular contact with our key CDC partners who are on the front lines of the housing crisis to better understand their concerns. As this Commission is aware, these

concerns revolve around the knotty issues of affordability, speculation, displacement and landlord harassment. Particularly, CDCs are concerned that unlocking land value in rezoned neighborhoods will unintentionally create displacement pressures. We strongly agree with the goal of providing incentives for building housing for a wide range of household incomes in the current proposal. However, we are concerned that the affordability options in MIH may not deliver sufficient benefit to households with the greatest need, namely extremely low and very low-income households.

We urge the Commission to listen carefully to nonprofit community development organizations in weighing feedback to MIH, particularly those with a track record of working in partnership with the City to develop and preserve affordable housing. Some welcome modifications to MIH that may address their concerns include:

1. Pegging the AMI requirements in MIH to the local neighborhood geography as opposed to citywide AMI levels;
2. Requiring that in each option available to developers that a certain percentage of units be affordable to very low-income earners; and
3. Implementing stronger mechanisms to ensure that low-income households in rezoned neighborhoods also benefit from new development and community amenities.

We understand that requiring deeper affordability and having stronger displacement protections may require programs and services outside the purview of zoning regulations. We welcome the opportunity to be a thought partner with the City in these efforts.

Thank you for the opportunity to testify.

December 16, 2015

Contact: Edward Ubiera, Director of Policy, LISC NYC 212-455-9584



Metropolitan Council on Housing

339 Lafayette Street, Suite 301 New York, NY 10012

Testimony to the City Planning Commission on MIH and ZQA
Ava Farkas, Executive Director, Met Council on Housing
December 16, 2015

- Met Council on Housing recommends a “No” vote on MIH
 - It is not really affordable to the New Yorkers who need it most
 - Almost half of New Yorkers are earning less than 60% AMI
 - Inwood and E. Harlem are at 48% AMI and 37% AMI
 - Option 3 at 120% AMI and rents of \$2400 – is market-rate housing – why is the city giving away density for market rate housing that would be built anyway?
 - It does not get deeper affordability than 421A
 - It is not going to create good, union jobs
 - It will create secondary displacement and gentrification
 - The speculation that MIH will generate will create additional gentrification pressures on rent regulated tenants in the area with the greatest concentration in Manhattan: Inwood & Washington Heights.
 - ZQA would be available to developments of purely market-rate housing not just affordable or senior housing, why is this the case?
 - Potential problems with Modular and pre-fab construction should be examined and the effect on unionized labor and jobs should be studied as part of the EIS.
- We would like the CPC to make the following recommendations:
 - There should be an option affordable to households earning 30% of AMI
 - There should be an option that includes 50% affordable housing
 - Option 3 should be removed from the plan
 - The city should study the Real Affordability for All Coalition’s plan for a density bonus which will create housing for people below 50% AMI in exchange for building higher.

Movement for Justice in El Barrio
232 East 11th Street
New York, NY 10003

Carl Weisbrod
Director, Department of City Planning
Chair, City Planning Commission
22 Reade Street
New York, NY 10007-1216

OFFICE OF THE
CHAIRPERSON

DEC 23 2015

29245

December 21, 2015

Dear Chair Weisbrod,

According to the notice of the DCP's public hearing to receive comments related to the Draft Environmental Impact Statement concerning zoning amendments on ZQA and MIH on 12/16/15, written comments on the DEIS are being received and considered until December 28, 2015. Thus we, Movement for Justice in El Barrio, are hereby submitting these attached comments for official review.

Subject: Draft Environmental Impact Statement concerning zoning amendments on ZQA and MIH, N 160051 ZRY and N 160049 ZRY.

Date of Hearing: 12/16/15

Borough: Manhattan

Position: Opposed

Comments: We, Movement for Justice in El Barrio, have organized community consultations where community members have come together since the beginning of the year to learn about the rezoning plan and to develop our own position and proposal. The result of these consultations is a clear position opposing the rezoning plan and specifically the rezoning amendments, Mandatory Inclusionary Housing and Zoning for Quality and Affordability because of the negative impacts they will have on our community, and the development of a plan of our own.

We are opposed to this rezoning plan where 70-75% of all new units will be market-rate, luxury housing. The thousands of market-rate, luxury apartments created in the community if the proposed rezoning plan goes through will lead to displacement of long term low-income tenants. These new luxury units and their market rate rents and higher income residents will put pressure on long term low-income tenants and small local businesses that contribute to the fabric and culture of El Barrio. Low-income tenants and small businesses will be priced out of their homes and communities. It has happened before in East Harlem and elsewhere in the City and it will happen again.

The units set aside as “affordable” are not within reach for current East Harlem residents. In the plan, for the 25-30% of units set aside as “affordable,” the average incomes range from \$46,620 to \$62,150 for a family of three – well above \$33,600, the East Harlem area median income (AMI) for a family of four. These units designated as “affordable” are not for current East Harlem residents, but will, like the luxury units cater to newer, wealthier residents.

We submit to the DCP as a response to these rezoning amendments our enclosed report, “Rezoned East Harlem = Loss of Affordable Housing: A 10-Point plan for the De Blasio Administration to preserve rent-stabilized housing.” As residents of East Harlem, we are concerned that the rezoning that the Mayor has planned for our neighborhood, as laid out in Housing New York: A 5-Borough, 10-Year Plan and Mandatory Inclusionary Housing, will cause displacement of long-term low-income residents from their rent-stabilized homes in our community, as described above. It is within this context that we believe it is of utmost importance that our 10-Points to preserve rent-stabilized housing be implemented. When enacted, the community-generated recommendations will help to reverse the trend toward displacement of low-income immigrant and people of color communities.

Please accept this community-generated letter and the 10-point Plan as our written response as regards the MIH and ZQA amendments discussed at the public hearing on December 16, 2015, comments which DCP is receiving until Monday, December 28, 2015.

Organization: Movement for Justice in El Barrio
Address: 232 East 11th Street, New York, NY 10003

Sincerely,
Movement for Justice in El Barrio

Enclosure: “Rezoned East Harlem = Loss of Affordable Housing: A 10-point plan for the De Blasio Administration to preserve rent stabilized housing”

Hearing Proposed Zoning Text Amendments
Dec.16, 2015 **Museum of the American Indian**

The proposed Zoning Text Amendments have nothing to do with creating affordable housing or anything they propose to do. The entire city voted against both of them in almost all of the Community Boards in all the boroughs in New York City. There was a huge turn out of members of the public who adamantly rejected both of these amendments.

Both Community Board members and other New Yorkers have totally rejected these amendments. It is said the they only benefit the developers, and seem to be written by REBNY (Real Estate Board of NY).

Any zoning amendment must benefit our great city, not bring harm to it. Hard fought for protections for our neighborhoods; for our city, are swept away by these amendments from old law tenement reforms to recent destructive overdevelopment etc.

New York City, the greatest city in the world, is a city of historic neighborhoods and must be a place of intelligent planning so that we can have the magnificent future that we must have.

There is an urgent need for City Planning to work with communities. The destructive 1961 zoning on the northwest shore waterfront on Staten Island has destroyed the economy, created public health and traffic hazards, destroyed peoples' homes, an American's greatest asset, waterfront access, and our heritage etc etc. This is what needs to be immediately addressed , and this is what will create a great future. Forcing dangerous industrial zones on once thriving communitis where people live and destroying them further by allowing this dangerous zoning to block our waterfront must never be allowed.

We want to to work with City Planning to create a great New York. Each community is different. It is impossible to have

one rejected destructive plan forced on our great city that doesn't want it.

We are a city of great historic neighborhoods where everyone wants to be a part of.

**We must work together to save the the identity of New York.
City Planning must work with New York.**

**North Shore Waterfront Greenway
Four Borough Neighborhood Preservation Alliance
West Brighton Restoration
Richmond Terrace Conservancy
Etc.**

NEW YORK HOUSING CONFERENCE

Testimony in Support of NYC Planning Proposals for Zoning for Quality and Affordability and Mandatory Inclusionary Housing

My name is Carol Lamberg and I am Co-chair of the New York Housing Conference (NYHC). Thank you for the opportunity to testify in support of both Zoning for Quality and Affordability (ZQA) and Mandatory Inclusionary Housing (MIH).

NYHC is a statewide affordable housing policy and advocacy organization. Our mission is to advance City, State and Federal policies and funding to support the development and preservation of decent and affordable housing for *all* New Yorkers through our broad-based coalition.

New York City is facing an affordable housing crisis. More than half of renters pay over 30% of their income on housing costs, qualifying as rent-burdened according to federal standards. Nearly 60,000 residents sleep in municipal homeless shelters on any given night, including 23,000+ children.

NYC housing vacancy rate of 3.45% is at an emergency level. Demand for affordable housing continues to grow as rents soar. Our aging population adds to the growing demand for affordable housing options. By 2040, we will see a 40% increase in elderly NYC households, rising to 1.4 million seniors. For many senior households on fixed incomes, keeping up with rising rents is difficult. A shocking 65% of single elderly households pay more than half of their income on rent, despite being in rent-stabilized apartments.

Escalating property costs and construction costs challenge the feasibility of affordable housing development. Land costs make it difficult for affordable housing developers to compete for sites in moderate- and even low-income neighborhoods. In NYC neighborhoods, rising land values also drive tenant displacement without enough resources for preservation of existing affordable housing which, can help combat this trend. In view of federal cutbacks, we need every tool in the tool bag

Moreover, strategic affordable housing investments can act as a catalyst for the economic development of low-income areas. Innovative policy solutions paired with critical housing resources are necessary to continue revitalizing distressed communities. It is also important that City policy fosters the preservation of existing affordable housing and encourages the creation of housing options for low-income families in high opportunity areas. As part of the Mayor's housing plan, the Department of City Planning has proposed changes to zoning regulations to make it easier to build and preserve affordable housing citywide through Zoning for Quality and Affordability. While the City's Mandatory Inclusionary Housing (MIH) proposal leverages the private market to build more affordable housing in up-zoned neighborhoods and in private zoning applications, I would like to elaborate on my reasons for supporting each of these proposals and will start with ZQA.

NYHC supports the ZQA proposal and would like to highlight the following features beneficial to affordable housing production and preservation:

- Zoning envelope changes to setback and coverage requirements will make it easier to build housing, especially affordable and senior housing.

- Including more efficient use of sites by making it easier to use modern construction techniques like block and plank.
- Better ground floor retail will be achieved by raising height only 5 feet.
 - This is better for communities in terms of the quality and variety of retail a developer may be able to attract.
- Elimination of parking requirements for affordable and senior housing in transit zones, most of which are within a half-mile of subways, will reduce development costs.
 - Proposal will save \$1 million in every new 100-unit building, which is the cost to build the 25 parking spots currently required by local law as underground parking (based on \$40k per structured parking space). It is true that parking is popular in many neighborhoods, but in this time of housing crisis, it is not a priority. Developers have had to take extra complex steps to eliminate parking on difficult sites and in projects for the elderly where the spaces are not used. The new proposal does not make it impossible to include parking. It just removes the requirement and allows flexibility.
 - Residents of affordable housing in transit zones own far fewer cars than other households so it makes sense to stop requiring parking.
 - Only 5 percent of seniors living in affordable housing in transit zones own cars.
 - LiveOn NY, an advocacy organization for older adults, recently surveyed existing parking lots owned by nonprofits and found 39 underutilized and buildable parking lots across New York City. If the new zoning proposal is adopted, these concrete lots can be easily converted to affordable housing for 2,000 seniors.

In summation, Common-sense zoning improvements can unlock sites for affordable housing and save public subsidy. As a city, we need better zoning regulations to foster the production of more affordable housing.

Turning to MIH, this creative solution takes advantage of the booming real estate market and has the potential to provide needed affordable housing for low and moderate-income New Yorkers. We like that MIH will apply to any future rezoning that the City, a community, or even that which a private developer proposes. This will create significant additional residential capacity in a medium- or high-density district. It is important that the City reviews the potential for high-opportunity area re-zonings as MIH can be a tool to achieve better economically integrated communities in our city. Other features of MIH that we support are as follows:

- MIH provides affordability options to match local housing needs.
- The incomes served by the affordable housing must average to the specified Area Median Income, with some lower and some higher. This flexibility can be tailored to better meet community needs.
- The affordable housing will be required to remain permanently affordable.

NYHC hopes the Administration will work in collaboration with communities to assure full support and make local accommodations to the current proposals where appropriate in response to community feedback. NYHC urges the City Council to support both of these proposals to help address New York City's affordable housing crisis.

**THE NEW YORK
LANDMARKS
CONSERVANCY**

December 16, 2015

**STATEMENT OF THE NEW YORK LANDMARKS CONSERVANCY AT THE CITY PLANNING
COMMISSION PUBLIC HEARING REGARDING THE ZONING FOR QUALITY AND AFFORDABILITY
AND MANDATORY INCLUSIONARY HOUSING PROPOSALS**

Good day Chair Weisbrod and Commissioners. I am Andrea Goldwyn speaking on behalf of the New York Landmarks Conservancy. The Conservancy is a private, independent, not-for-profit organization founded in 1973. Our mission is to preserve and protect historic resources throughout New York.

We cannot support ZQA and MIH, massive upzonings of the entire city, which impose a one-size-fits-all approach and ignore New York's unique communities.

Preservation contributes to affordable housing by maintaining units in older buildings, often in low-scale historic and contextual districts. ZQA encourages new construction with no guarantee of increased affordable housing. There needs to be an analysis of expected new market-rate and affordable units versus stabilized and affordable units that will be lost in ZQA.

We agree with our friends in the affordable housing community that the enormous amounts of market-rate development which MIH requires to produce a small number of affordable units will tip the balance of many neighborhoods far from affordability, and that the provisions allowing the Board of Standards and Appeals to waive even these requirements will further reduce the number of new affordable units.

Regarding historic resources, the DEIS is clearly flawed. It finds no impacts since ZQA is not expected to induce development, despite the goal of increased building. ZQA will affect City-designated historic districts, National Register districts, and districts eligible for National Register listing. It will put undue pressure on the Landmarks Commission to approve out of scale additions and new construction in historic districts with contextual zoning. This would negate landmark designation protections and add pressure to slow future designations.

This upzoning overturns basic planning principles. The review process is speeding along faster than that of any contextual district ZQA will replace. Communities with contextual zoning labored over years to ensure that plans tailored to their neighborhoods garnered consensus, often through compromise. Homeowners thought they had certainty regarding their blocks. ZQA threatens that work, and abandons agreements forged with the City. Light and air were once valued. Rear yards provided open space with grass coverage that alleviated stormwater runoff, but now they can be filled in to maximize FAR. ZQA reverses the Sliver Law and erases the distinction between narrow and wide streets. The system of FAR limits has always been a cap; under ZQA it will be an entitlement.

There is no strong rationale for alterations to Quality Housing regulations. It's not clear why significant sets of changes that will be realized very differently are forced together in one proposal. We are concerned that that the changes to Quality Housing regulations will not increase quality as much as just allow for taller buildings. Construction methods evolve, so it's impractical to alter zoning for decades based on one technique (block-and-plank) likely to be replaced in coming years. And the focus on higher ground floor heights seems disproportionate to all of the other factors that contribute to a building's success.

The Administration and the Council are already talking about changes. We think it's time to withdraw, go back to the drawing board, and craft a proposal that addresses issues that we and communities across the City have raised.

Thank you for the opportunity to express the Landmarks Conservancy's views.

Panero Zelnik Architects

architects - interior designers - planners

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New York, New York 10001

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"Sometimes it is the people no one imagines anything
of who do the things that no one can imagine."

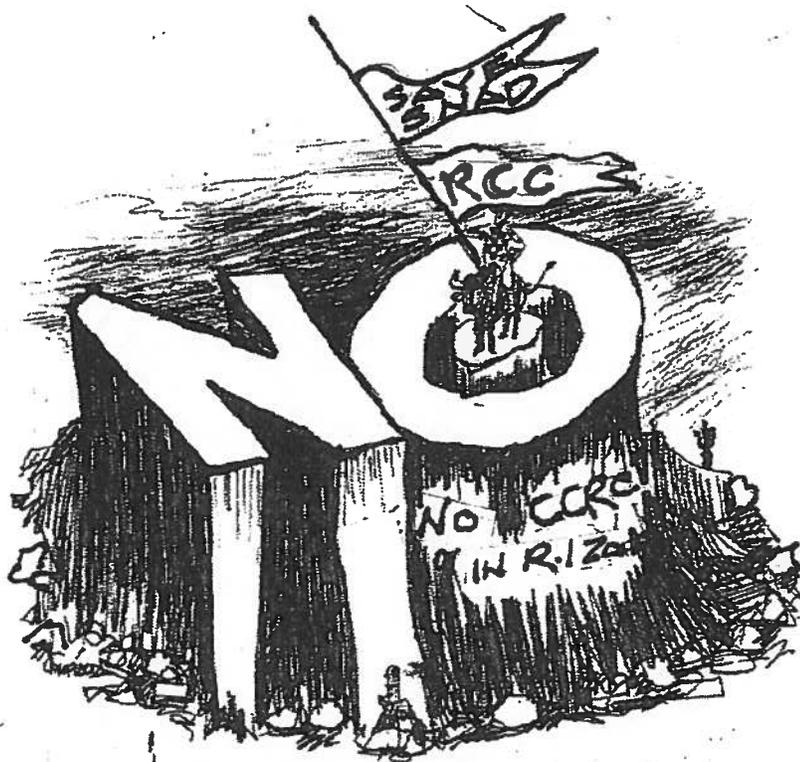
The Imitation Game

14 December 2015

To: Members of the City Planning Commission

Fr: Martin Zelnik RA/AIA Member Riverdale Community Coalition and Head of
Sigma Place Home Owners Association

Re: In Opposition to the 10 Acre Exemption and ZQA Amendments Permitting
CCRC Apartment Houses in SNAD Protected R1 and R2 Zoning Districts



IN OPPOSITION TO
LUXURY CCRC APARTMENTS
IN R1+R2 ZONING DISTRICTS

As a former member of the NYC Rent Guidelines Board, I support the efforts by the CPC and Mayor de Blasio to encourage the development of low income throughout the City of New York. Clearly, others representing community boards from throughout the five boroughs will express that opinion, while also pointing out many of the proposed changes that are inconsistent with their respective geographic and neighborhood locations. It is my attempt to focus on The proposed 10 Acre Exemption that has been neatly and arbitrarily carved out for the explicit purpose of providing a vehicle to construct high rise multi-story CCRC apartment houses in an R1-1 zoning district in the Riverdale section of The Bronx. This begs the question, at the outset, as to why under the umbrella of zoning changes to encourage developers to construct low and moderate income home does an exclusive private development become arbitrarily inserted into this text? Why?

It is evident from the text, that the *10 Acre Exemption and ZQA Amendments* have been constructed and defined in such a way so as to enable but one institution, The Hebrew Home, to construct apartment houses that absolutely do not comply with present R1-1 zoning. And not only would these apartment houses not comply with the present zoning, but they would by no means fall under the umbrella of "affordable" let alone low income housing.

The Commissioners must first ask themselves, why is this CCRC exemption made part of this text in the first place when it truly has nothing to do with the rest of the 1000 page text? Of course, CCRCs are important. Of course they are needed in NYC?

But....

Are the Commissioners aware that the Hebrew Home is proposing apartment houses that will contain a minimum of 340 apartments?

Are the Commissioners aware that all of these apartments will be allocated on site parking spots for the residents?

Are the Commissioners aware that these "low and moderate income apartments" will be selling for a minimum of \$775,000 and up?

Are the Commissioners aware that the residents will be paying over \$4500/month and up for monthly rental and expenses?

Are the Commissioners aware that these *10 Acre Exemption and ZQA Amendments* will permit future developments of this kind in all R1-1 and R-2 zoning districts throughout the City?

Are the Commissioners aware that present R1 and R2 Zoning does not permit high rise multiple dwellings?

Are the Commissioners aware of the special text amendments passed under Art 197a some 12 years ago decried such incompatible development in this particular SNAD protected area of Riverdale?

Are the Commissioners aware that by passing these *10 Acre Exemption and ZQA Amendments*, it will allow the Hebrew Home to bypass mandated SEQRA and CEQR requirements?

Are the Commissioners aware that by permitting these *10 Acre Exemption and ZQA Amendments*, it will open the door to other developers to start to acquire single family home *10 Acre Exemption and ZQA Amendments* sites in ALL R1 and R2 zoning districts throughout the City thus destroying whatever remaining fabric there is of one family homes?

Are the Commissioners aware that these *10 Acre Exemption and ZQA Amendments* have probably been formulated, influenced by, if not written by lobbyists and legal counsel for the Hebrew Home in order to by-pass the existing zoning constraints, yet done so without any transparency or public discourse?

Are the Commissioners aware that these *10 Acre Exemption and ZQA Amendments* have been vehemently opposed by a coalition of community groups over a three year plus period?

Are the Commissioners aware that these *10 Acre Exemption and ZQA Amendments* should have been publically discussed with concerned local community groups consistent with fundamental principles of inclusion, transparency, and democratic principles...but were not?

Accordingly, after the Commissioners have answered the questions that I have posed above, it is proposed that the Commissioners reject and withdraw the *10 Acre Exemption and ZQA Amendments*.

Yours sincerely,



Martin Zelnik RA/AIA

**NYU
Furman
Center**

Advancing research and debate
on housing, neighborhoods,
and urban policy

School of Law
Wagner School of Public Service

**Overview of NYU Furman Center Research
Relevant to Mandatory Inclusionary Housing and Zoning
for Quality and Affordability Text Amendment Proposals**

Mark A. Willis
Executive Director

New York University's Furman Center for Real Estate and Urban Policy

Testimony before the New York City Planning Commission
Wednesday, December 16th, 2015

Good morning, Chair Weisbrod and Commissioners. Thank you for the opportunity to testify today. My name is Mark Willis, and I am the Executive Director of the Furman Center for Real Estate and Urban Policy at New York University. The Furman Center is a joint research center of the NYU School of Law and the University's Robert F. Wagner School of Public Service. Our work at the NYU Furman Center is devoted to examining the public policy aspects of land use, real estate development, and housing.

Today I would like to share research findings relevant to the two zoning proposals now under consideration: the Mandatory Inclusionary Housing program (MIH) and Zoning for Quality and Affordability (ZQA). I have attached to my testimony two policy briefs that contain the relevant findings: *Creating Affordable Housing Out of Thin Air: the Economics of Mandatory Inclusionary Zoning in New York City*, which was released earlier this year; and *Minimum Parking Requirements and Housing Affordability in New York City*, which was released in 2011.

These policy briefs consider how mandatory inclusionary zoning and parking requirements might affect the production of housing—and affordable housing more specifically—in New York City. The demand to live in the City has never been stronger from households at all income levels, but the supply of new housing is not keeping up. The resulting shortage is contributing to the upward pressure on rents and home prices. In 2013, for example, 54 percent of renter households in New York City paid 30 percent or more of their income on rent, and a full 30 percent of renters in the City paid more than 50 percent of their income towards rent.¹

Mandatory Inclusionary Zoning

Let me first share our learning regarding inclusionary zoning. We hope that our analysis provides a financial context to understand how mandatory inclusionary can create affordable units by harnessing market-rate development without dampening the rate of investment in new residential buildings. We appreciate that the Commission must also consider legal parameters, planning principles, and community input.

The goal of inclusionary zoning is to have market-rate units “cross-subsidize” the development of affordable units.² With such a program, affordable units are automatically created—as long as market-rate development continues—without the need for any direct expenditure of City subsidy dollars.

With its proposal, the City seeks to create a template for implementing mandatory inclusionary zoning where rezonings create substantial additional residential zoning capacity. Because the City contains a range of market types, designing such a program that can work city-wide is

¹ NYU Furman Center, U.S. Census Bureau 2013 American Community Survey.

² NYU Furman Center (March 2015). *Creating Affordable Housing Out of Thin Air: the Economics of Mandatory Inclusionary Zoning in New York City*. New York, NY. Retrieved from http://furmancenter.org/files/NYUFurmanCenter_CreatingAffHousing_March2015.pdf.

admittedly complex. If the City wants to encourage continued development of both market-rate and affordable units, it must consider how its policy may influence the choices that developers and landowners make. For our analysis, we looked to see how increased density could be used to subsidize affordable units without dampening supply. Based on assumptions of construction and operating costs and the existence of property tax exemption under 421-a, we found that:

- In neighborhoods where rents are high enough to support new mid- or high-rise development, additional density alone can create a cross-subsidy that both supports the creation of some affordable units while still allowing developers to earn what we understand to be a commonly expected return. The higher the rents, the higher the percentage of the added units that can be required to be affordable without diminishing the developer's overall return.
- In much of the City, however, rents are not high enough to spur mid- or high-rise development in the first place even if land were free. Adding additional density alone will not spur development in these neighborhoods and so development in these areas will need to be subsidized.

In summary, combining increased density with mandatory inclusionary zoning can work to support the building of both market-rate development and affordable housing without the need for any additional government subsidy. The challenge is to do it so as not to suppress development.

Parking Requirements and Housing Affordability

The second area of research I want to share is our work on the effects of parking requirements on the affordable housing that the City can develop. As I am sure you understand, providing parking facilities increases overall construction costs and so, in effect, increases the cost of each unit built. Our research found that the City's parking requirements can cause developers to build more parking spaces than if they were simply meeting demand.⁴ Reducing parking requirements for affordable units near transit, as ZQA proposes, could better align the number of spaces provided with the need for parking. The resulting reduction in the cost of building affordable units would allow the City to stretch its subsidy dollars further and support the production of more affordable housing or target lower income households.

Thank you for the opportunity to testify.

⁴ New York University, Furman Center for Real Estate and Urban Policy (2011). *Minimum Parking Requirements and Housing Affordability in New York City* (p. 11). New York, NY. Retrieved from http://furmancenter.org/files/publications/furman_parking_requirements_policy_brief_3_21_12_final_2.pdf.



TESTIMONY BEFORE THE CITY PLANNING COMMISSION

On the Mandatory Inclusionary Housing (MIH) and Zoning for Quality and Affordability (ZQA) Text Amendments

**Kathryn Wylde
President & CEO**

Wednesday, December 16, 2015

The Partnership for New York City is an organization of business leaders and major employers. For the past 35 years, the Partnership has worked with government, labor and the nonprofit sector to address major challenges facing the city, including the recurring challenge of a shortage of affordable housing.

During the 1980s, the Partnership co-sponsored a program with the city and state that was the largest producer of new affordable housing on vacant land across the five boroughs. During that period, the affordable housing shortage was a result of the loss of hundreds of thousands of units to fire and abandonment. It reflected a weak market that could not support private investment. Today, we have a thriving residential market but with similar consequences - the vast majority of New Yorkers cannot afford to purchase or rent a home or apartment here.

The city tax base is not broad or deep enough to subsidize housing for the 21% of the population that lives in poverty or the 47% of the population that is forced to pay more than a third of their income in housing costs. The city no longer has the inventory of tax-foreclosed properties to contribute to reducing the cost of affordable housing nor access to sufficient federal housing funds to support a pipeline of low income housing production. Zoning actions to increase density and reduce costs are among the only significant tools the city has to induce the development of housing that responds to the needs of our growing population of low, moderate and middle income New Yorkers.

The Partnership does not agree with all the details of the zoning proposals before you. Municipal mandates are not popular with the business community. Nor do we agree with social engineering that requires affordable units be located within developments or

districts that command the highest market rates and, consequently, deprive lower income communities of the subsidies needed to accommodate the weakest markets.

Despite these differences, the Partnership supports the zoning proposals before you and urges the Commission and City Council to move forward with their approval and to avoid amendments that reduce the city's flexibility and discretion in administering these new tools. The only solution to the affordability crisis in a city that is growing and prospering is MORE housing, which means greater height and density, reduced parking and set back requirements, and wide latitude to design and develop properties toward a single goal: maximum utilization of sites for housing to reach the lowest income households with minimum commitment of city-funded subsidies, which will always be inadequate to the needs. The zoning amendments are generally structured to achieve these goals and should be adopted quickly.

December 16, 2015

OFFICE OF THE
CHAIRPERSON

DEC 22 2015

20233

Carl Weisbrod, Chair
City Planning Commission
120 Broadway 31st Floor
New York, New York 10271

Re: "Zoning for Quality and Affordability" and the "Mandatory Inclusionary Housing"

Dear Chairman Weisbrod:

As past Civic President of the Queens Colony Civic Association, I oppose Mayor de Blasio's two proposals to increase the number of affordable housing units and senior housing units to be constructed in our city. Our Civic Association has fought long and hard for zoning regulations to protect the low-rise character of our neighborhood. We do not want to become a high density neighborhood, full of people and crowds. Long time and new homeowners purchased their homes here specifically because they wanted the quality of life one finds in one family neighborhoods with the ability to park in front of our homes, have a private backyard and basically to get away from high density living.

This plan would wipe out low density neighborhoods and damage the character and texture of unique neighborhoods. One size does not fit all! Only one third of Queens has subway service meaning many residents rely on cars and parking. The typical homeowner in our neighborhood has at least two or 3 cars with only one spot in front of our home to park. To eliminate parking requirements for senior housing is ridiculous as seniors age they continue to drive past their '80's. Queens schools are already overcrowded and adding density living would put our schools in even greater crisis as well as our sewer system and sanitation services.

No Mayor or City council should have the power to reshape how we choose to live in this city with a stroke of the pen. Maybe in Russia this type of action is forced upon its populace but not here in America. The Mayor's Zoning Plan should be withdrawn and reevaluated.

Sincerely,

Virginia Salow

Virginia Salow
88-27 247th St.
Bellerose, New York 11426
718-347-0389

c: Mayor de Blasio
Speaker Melissa Mark Viverito
Councilman Barry Grodenchek

Angela Augugliaro, Pres., Queens Colony Civic Assoc.



December 16, 2015

Re: City Planning Commission Hearing - MIH and ZQA

Chairman Weisbrod and Commissioners:

My name is Alan Washington and I am the Director of Real Estate and Planning at the Downtown Brooklyn Partnership (DBP), a not-for-profit economic development organization. On behalf of DBP, I would like to thank the de Blasio Administration for its work on these two very critical issues and the City Planning Commission for hosting this public hearing.

As the neighborhood development organization for Downtown Brooklyn, DBP works to foster the growth of the business, retail, cultural, educational, and residential components of our district. We are particularly keen on making sure the new residential growth occurring in Downtown Brooklyn is available to as many Community Board 2 residents as possible and as such we support programs that aim to preserve and create affordable housing. In fact, we recently co-lead an affordable housing seminar series in partnership with other not-for-profit and for-profit organizations to help educate our neighbors and spread the word about affordable housing opportunities in Downtown Brooklyn. We set out to reach 650 local residents and ended up connecting with 3,500. While this is great news in terms of the success of the seminar series, the frank reality is that the most recent housing lottery in Downtown Brooklyn, which had 200 affordable homes, received over 89,000 applications. Clearly there is an immediate need for more affordable housing, not just in Downtown Brooklyn, but across the entire City.

Therefore, we believe the Mayor's proposed Mandatory Inclusionary Housing program will take an important step towards creating more opportunities for New York City residents. While there is some disagreement about what the final AMI bands should be, and further discussion with the development community may be necessary to ensure the market fundamentals are in place to achieve the desired goal, we strongly support the program and believe it will make our city a better place. The program is forward thinking and aggressive, specifically as it relates to permanent affordability while at the same time recognizing the importance of partnering with the private real estate community to achieve ultimate success.



Downtown Brooklyn Partnership
1 MetroTech Center North, Suite 1003
Brooklyn, NY 11201
www.downtownbrooklyn.com

We also support the proposed Zoning for Quality and Affordability text amendment (ZQA) which will provide a more efficient pathway to create affordable senior housing facilities and inclusionary housing projects and in the process create more inviting streets for pedestrians which, in our experience, is a critical component of any successful neighborhood.

We look forward to seeing these two proposals implemented and offer our support in the process.

Thank you again for the opportunity to speak today.

Sincerely,

A handwritten signature in blue ink, appearing to read "Alan Washington".

Alan Washington
Director, Real Estate & Planning
Downtown Brooklyn Partnership



**Regional Plan Association testimony before the New York City Planning Commission
on December 16, 2015, in support of the Zoning for Quality and Affordability and
Mandatory Inclusionary Housing zoning text amendments**

**Christopher Jones, Vice President for Research &
Pierina Ana Sanchez, Associate Planner for New York**

Good morning, my name is Christopher Jones and I am Vice President for Research at Regional Plan Association, which aims to improve the New York metropolitan region's economic health, environmental sustainability and quality of life through research, planning and advocacy.

Both zoning text amendments under consideration are critical to the goal of expanding New York City's supply of affordable housing while improving quality of life in neighborhoods throughout the five boroughs. The Zoning for Quality and Affordability and Mandatory Inclusionary Housing proposals strive to strike a balance between these two imperatives. However, the input from residents, community boards, civic organizations and elected officials throughout the review process has highlighted a number of ways in which these actions could be improved and that the commission should address prior to approving the amendments.

The reasons for these zoning changes are sound and compelling. We can't address the city's large and growing need for affordable housing without revising outdated zoning guidelines or insuring that new construction includes housing for a wide range of incomes.

We also have a growing city that needs to find ways to welcome new residents—the children of existing residents, a rapidly expanding senior population, immigrants who renew the city's vitality, and young adults who are increasingly drawn to dynamic cities like New York. For the New York metropolitan region as a whole including the counties surrounding the five boroughs, we could see demand for nearly four million additional people who want to live here by 2040. Because New York City will get a significant portion of this growth, housing pressures for families and individuals at different income levels will only continue to increase if we don't increase housing production to meet demand. These proposals could also help the city by providing a template for equitable development in areas throughout the region, helping relieve housing pressures in the city while reviving stagnating suburban economies.

But building enough housing is only the start. Creating mixed-income neighborhoods with a high quality of life will require a range of actions, from preserving existing affordable housing and preventing harassment and displacement of existing residents to providing the necessary transit, schools, parks and other infrastructure. In fact, as these zoning changes are implemented, it will be essential to simultaneously implement the neighborhood and infrastructure improvements needed to improve quality of life for both existing and new residents.

The two amendments are important parts of this larger set of actions, and with further changes could be even stronger.

Zoning for Quality and Affordability (ZQA) includes incremental, practical changes to outdated code that would help the city create new affordable housing and mixed-use development through more

flexible design, modest height increases in limited situations, and lower parking requirements in areas well-served by transit. Among its most positive features are policies that will make it easier to provide more affordable housing and affordable senior housing and care facilities, encourage more vibrant streets and quality retail space, and reduce parking requirements in areas with low car ownership levels. The amendments would not prevent developers from putting in additional parking if the market demands it, but would lessen restrictions that overestimate need and substantially raise the cost of development.

While the changes included in ZQA are modest, the provision as a whole is complex. The comments from community board and public officials indicate a legitimate need for City Planning to more fully explain how the changes would affect individual communities, and particularly how ZQA will work in tandem with Mandatory Inclusionary Zoning, proposed neighborhood rezonings and related city initiatives. Among the changes that have been recommended, two warrant particular consideration:

- The text should make clear that the additional bulk allowed for senior housing would be made permanently affordable. This is consistent with the intent of the Mandatory Inclusionary Housing proposal and a basic tenet of the administration's housing policies.
- The lower parking requirements could be refined with a further analysis of origin-destination patterns and actual transit use. It may be possible to go even further in some communities, while others may be found to be inadequately served.

Mandatory Inclusionary Housing (MIH) presents an ambitious approach to private market participation in the supply of permanent affordable housing. If adopted, MIH would be the most rigorous inclusionary housing requirement in any major U.S. city. The challenge is how to shape a program that works in vastly different market contexts and that supports the larger policy goal of creating mixed-income neighborhoods. It's important to recognize that MIH is only one tool to address the city's affordable housing needs, and can only work where there is a private market to support new development. The text could be improved to address the needs of the more than 40% of New York households earn less than 60% of the region's average median income:

- The City should clarify how it proposes to combine MIH requirements with existing affordable housing incentives such as 421a and LIHTC to achieve deeper levels of affordability.
- Additional options should be added to the three MIH options in the amendment to permit deeper levels of affordability and address a wider range of market conditions. This will also help achieve an equitable city with a wide variety of mixed-income, livable neighborhoods, including currently middle- and upper-income neighborhoods.
- The amendments should do more to encourage onsite rather than offsite affordable housing. While offsite housing may in many cases be more economical to build, it comes at a cost. It is less likely to be close to transit, good schools and economic opportunities, and often is less well-maintained than units that are physically part of the market rate developments.

We urge the Planning Commission to amend and approve both zoning text amendments, which are vital to the city's larger goal of providing livable, affordable neighborhoods for its growing population.

ALBERT K. BUTZEL LAW OFFICES
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October 27, 2015

Hon. Carl Weisbrod, Chair
City Planning Commission
22 Reade St,
New York, NY 10007

OFFICE OF THE
CHAIRPERSON
OCT 30 2015

28891

Re: Proposed ZQA and the Hebrew Home

Dear Chair Weisbrod:

I write on behalf of the Riverdale Community Coalition and the Riverdale Nature Preservancy to protest that proposed changes in the City Zoning Resolution that would allow Continuing Care Retirement Communities to be located in R1 and R2 districts, and even more specifically, to protest the amendment that would allow the CCRC proposed by the Hebrew Home for the Passionist property in Riverdale to be acted on by way of a City Planning Commission Authorization, thereby avoiding compliance with ULURP and review by the City Council. In the latter case at least, the manipulation of the zoning resolution is so obviously in the sole private interest of the Hebrew Home as to raise the specter of a backroom deal intended to cut the public and the Council out of the review and approval process.

I remind you that I wrote you in 2014 explaining why the Hebrew Home proposal for a 300-plus unit CCRC on the Passionist property did not constitute or qualify as a permitted use in an R1 district under the definition of a "health related facility" or in any other category. I also submitted with that letter a memorandum prepared by Michael Kwartler and me explaining why that was the case. (Copies of my letter and the memorandum are enclosed.) Despite this, DCP collaborated with the Hebrew Home in an effort to persuade the Department of Buildings to allow the project to go forward as a "health related facility." DOB rejected the argument and thus foreclosed building the CCRC under the current zoning resolution.

This rejection clearly led to your including a special provision in the proposed Zoning Quality Amendments to allow CCRCs, including large apartment buildings, in low-density, low-rise R1 and R2 neighborhoods. In late July of this year, representatives of my clients and I met with your staff to present our reasons why CCRCs should not be allowed in R1 and R2 districts. We were met with the representation that if the ZQA text, which had not yet been released, allowed this, any approval would be a discretionary act subject to ULURP, and that should ease our fears. We pointed out that we were not familiar with any instances where a discretionary approval for a major project had not been granted and emphasized our view that apartment buildings, however styled, did not belong in low density residential districts. After the meeting, I sent a thank-you letter to Carol Samol in which I spelled out the reasons in support of our position that we made in the meeting. A copy of that letter is also enclosed.

I hardly need say we were shocked when the Zoning Quality Amendments, as issued, not only permitted CCRCs in R1 and R2 districts, but in the case of the Hebrew Home allowed that project to proceed with the approval of the City Planning Commission only, bypassing the ULURP process and excluding the City Council from any role in the review and voice in the ultimate decision. This is accomplished by slipping in a provision that CCRCs proposed for properties of more than 10 acres only require a City Planning *Authorization*. By this sleight of hand, clearly intended to facilitate, accelerate and ultimately ensure approval of the Hebrew Home CCRC, DCP is seeking to squeeze the project through a loophole that applies only to that project. But by this sleight of hand, DCP has, I submit, also overstepped itself. As noted before, this misuse of the zoning resolution clearly reflects an arrangement made for the sole private benefit of the Hebrew Home and raises a significant issue regarding the integrity of the process.

The Riverdale Community Coalition and Riverdale Nature Preservancy believe that as a fundamental matter, apartment buildings are incompatible with and do not belong in low-density residential districts, of which there are all too few in the City, and they intend to do all they can in the ULURP process to defeat DCP's proposal to allow them. They will also do everything they can, both within and beyond the ULURP process, to defeat the Hebrew Home's proposed CCRC in its current form.

On behalf of my clients, I urge you to withdraw those sections of the Zoning Quality Amendments that would allow CCRCs in R1 and R2 districts.

Sincerely,



Albert K. Butzel

cc.: w/o enclosures
Hon. Bill de Blasio
Anita Laremont, Esq.
Ms. Carol Samol

ALBERT K. BUTZEL LAW OFFICES
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August 21, 2014

Hon. Carl Weisbrod, Chair
City Planning Commission
22 Reade St,
New York, NY 10007

Re: Continuing Care Retirement Communities
Section 90-74 of the Zoning Resolution
Hebrew Home of Riverdale

Dear Chair Weisbrod:

I represent the Riverdale Community Coalition, a neighborhood organization with more than 800 supporters who oppose the proposed Hebrew Home expansion in its current form.

Yesterday afternoon, Sherida Paulsen, Barry Willner, Martin Zelnik, Dick Baldwin and I met with Carol Samol and Juton Horstman of the Bronx Office and Anita Laremont to discuss the Hebrew Home's application and, in particular, its recently-stated intention to seek approval of its development as a "health related facility" under Section 74-90 of the Zoning Resolution. In advance of the meeting, Michael Kwartler and I had submitted a memorandum explaining why, in our view, the proposed development of more than 300 units of independent living apartments did not constitute a "health related facility" within the meaning of the *City Zoning Resolution* and why, as a matter of policy, we believe it would be inappropriate to try to squeeze the development into that category. I enclose a copy of that memorandum for your consideration.

To our surprise and consternation, our take-away from; yesterday's meeting was that you and the Department are seriously considering accepting and processing the Hebrew Home's application under Section 74-90. If that is the case, I respectfully ask that you meet with me and the others identified above before you make any final decision.

In this regard, I want to focus on one point in particular. We do not oppose Continuing Care Retirement Communities. To the contrary, a number of us, myself included, have had parents who lived out their last years in CCRCs, and we recognize that there should be a place for such developments in the City. The critical question for the Coalition is where they should be permitted. As to that issue, we do not believe that a decision should be made via a strained interpretation of Section 74-90 in a single case in Riverdale. Instead, the issue should be studied in depth and then be the subject of full ULURP review with the final decision resting with the City Council. If, instead, Section 74-90 is "interpreted" by the Department to allow a CCRC in the Hebrew Home case, that interpretation will apply across the City, without any opportunity having been given for public input or, equally important, for the political process to work its will.

It is, I think, important to emphasize that the development proposed by the Hebrew Home does not constitute a "community facility" as that term is generally understood. What is involved is 306 independent multi-family apartments, each with its own kitchen facilities, living rooms, bedrooms, dining areas and bath-rooms – a development no different in terms of impacts than other multi-family projects which are not permitted in R1 and R2 districts. Moreover, the units will be individually-owned and sell for \$500,000 or more apiece – hardly the type of housing that can be said to confer a community, rather than a private, benefit. To classify the project as a community facility could also have significant financial consequences for the City, because the development might well be taken off the property tax rolls. In short, rather than the Commission jumping headlong into uncharted waters and concluding that apartment buildings should be called non-profit "community facilities," the land use, tax and revenue implications for the City cry out for the careful evaluation of the City Council.

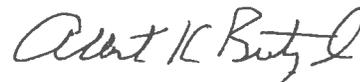
I also note that many, if not most, CCRCs in urban areas are located in high-rise buildings in commercial or dense residential areas. My mother, for example, lived out her life in a high-rise CCRC in downtown Seattle and my mother-in-law did the same in downtown Houston. CCRCs do not need to be sited in low-density residential areas, nor, in our view, does it make sense that they should be.

Finally, I emphasize that the Riverdale community struggled for years to achieve the R1-1 zoning and the protections of the Special Natural Area regulations, as reflected in the 197a plan for the area approved by the Planning Commission and the Council in 2003. Today, Riverdale remains one of only a few neighborhoods in the City where residents have had reason to rely on the low-rise character and limited density of their community. The prospect of the much denser Hebrew Home development with buildings rising to six stories or more is very disconcerting, to that point that many homes opposite the Passionist property are up for sale. The threat to the stability one of New York's valued neighborhoods is very real.

Again, I urge you not to shortcut the process for reviewing the place of CCRCs in the City. And on behalf of the Coalition, I respectfully ask for the opportunity to meet with you before the Department makes any decision on the applicability of Section 90-74 to the Hebrew Home project.

Thank you for your consideration.

Sincerely,



Albert K. Butzel

cc.: Anita Laremont, Esq.
Carol Samol
Juton Horstman

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To: Department of City Planning
From: Albert Butzel, Michael Kwartler
Date: August 14, 2014
Re: Hebrew Home Expansion

The Hebrew Home is proposing to develop 306 units of independent living apartments on its existing campus and the adjoining Passionist Property which the Hebrew Home now owns. The zoning on the Passionist Property is R1-1, which limits as-of-right development to single-family residential, with certain community facilities allowed by special permit,

The Hebrew Home initially sought approval for the development via an amendment of the existing zoning on the Passionist Property to R4. Deterred from that approach, the Home apparently considered a text amendment as a possible solution, but has not pursued that scenario.

Instead, its April 2014 submission to the Department, the Hebrew Home, though its attorney, has indicated that it intends to seek City land use approvals pursuant to Section 74-90 of the Zoning Resolution as a “health related facility” permitted in residential districts (including R1-1 districts) by special permit. In support of its position, the Hebrew Home has submitted a letter from the New York State Department of Health, the relevant part of which reads:

I have been advised that the term health related facilities as defined in Section 10NYCRR 700.2 of the NYS Hospital Code is an outdated term that does not apply to anything that exists today. I can confirm for you that a CCRC [Continuing Care Retirement Community] is a health related facility based on the fact that it is regulated under Article 46 of the Public Health Law and under NYS Insurance law as a health care product.

It is on the basis of this slim reed that the Hebrew Home apparently hopes to persuade the Department that the development of the 306 new apartments for independent living, taken together with the existing nursing home and related structures on the Hebrew Home campus, qualify as a “health related facility” and as such can be approved pursuant to Section 90-74 of the Zoning Resolution.

We think it is clear that the position of the Hebrew Home cannot be sustained on the basis of the DOH letter or any other grounds. *The critical issue is what the City Zoning Resolution intends by the term "health related facility," not what is basically a lay statement by an official of the Department of Health.* In this regard, it is important to note that the only citation in the DOH letter to the term "health related facility" is to say that under State law, the term is meaning-less. The further sentence that a CCRC is a "health related facility" is not based on any statutory provision or language but is used in an everyday sense that could be applied to any institution that provides health care. Nor is there anything in the DOH letter (or any other source) to suggest that the development of 306 apartments for private living are comprehended by the term "health-related facility" or are or should be exempt from the restrictions of the City Zoning Resolution applicable to multi-family housing.

Turning to the language of Section 74-90 of the Zoning Resolution, neither "nursing home" nor "health related facility" is a defined term under the Zoning Resolution. However, they are commonly understood to be something other than independent living apartments. Moreover, these terms were introduced into the Zoning Resolution in or before 1973, when independent living apartments hardly existed. So what legislative history there is does not support categorizing the proposed apartment development as "nursing home or health related facilities." On this basis alone, the Hebrew Home's proposal to apply for approvals under Section 74-90 should be rejected.

What is actually involved here is the development of multi-family housing, primarily on the Passionist Property, in an expansion of the Hebrew Home's existing facilities and service. What will result according to the Hebrew Home is a Continuing Care Retirement Community. This may be so, but that does not, by conjunction or otherwise, transform the multi-family development into a "health related facility" or, indeed, anything else than what it is.¹

There is no reference to a CCRC in the Zoning Resolution, and for good reason. CCRCs simply did not exist when Section 74-90 and other provisions for

¹ In the Legislative Findings that accompanied the adoption of Public Health Law Article 46, a CCRC is described as an attractive and innovative *residential* alternative for older New Yorkers . . ." (emphasis added). A reading of the materials prepared by the Hebrew Home also underscores the residential apartment nature of its proposed CCFC, clearly evidencing its intent to market the property as higher end residential housing for seniors.

elderly housing and nursing homes were added to the Resolution. As a result, the appropriateness of their siting in low-density residential areas has never been addressed by City Planning or the City Council. Moreover, the multi-family components of the Hebrew Home's CCRC involve the same kind and magnitude of impacts as any multi-family development – impacts that have been found to be incompatible with, and are therefore prohibited in, R1-1 and other low-density residential areas. This finding, reflected in the most fundamental fabric of the City's zoning, should not – and in our view, legally cannot – be overborne by an interpretation that would allow multi-family uses to sneak in under the guise of being “health related facilities.”

The broader implications of such an interpretation in this case underscore the urgency of rejecting it. For if the Department and City Planning concluded that the 306 apartments proposed by the Hebrew Home qualified as “health related facilities” under Section 74-90, the consequence would be to open every residential zone in the City to the influx of multiple family uses, subject only to the grant of special permits. This would constitute a rejection of the protections residents have long relied on zoning to provide and would, in a very real sense, represent a breach of trust on the part of the City.

If CCRCs are to be permitted as self-contained units (rather than being reviewed on a component-by-component basis), that is a decision that should only be made after the issue has been studied, proposals have been developed and debated and the matter has been fully reviewed under ULURP, including by the City Planning Commission and City Council. We believe the Council is unlikely to allow CCRC multi-family development in low-density residential areas, but whatever the outcome, it is the Council that should have the final word. It would, we submit, be both legal error and a mistake of policy to effectively rewrite an important section of the Zoning Resolution by allowing the Hebrew Home to proceed under Section 74-90 in seeking approval for the 306 multi-family independent living apartments it has proposed.

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August 11, 2015

Ms. Carol Semol
Director, Bronx Office
NYC Department of City Planning
1 Fordham Plaza # 502
Bronx, NY 10458

Re: CCRC and Hebrew Home Meeting

Dear Carol:

I write on behalf of the Riverdale Community Coalition and the Riverdale Nature Preservancy to thank you, Juton, Anita, Laura Smith and Shawn Brede for meeting with Jennifer Klein, Sherida Paulson and me on July 29. We appreciated the time that you spent with us, and we felt that the discussions were frank and helpful.

We continue to believe that the amendments under consideration, which would allow CCRCs in the City, should exclude them from R1 and R2 districts. We take this position because CCRCs are fundamentally incompatible with the character and fabric of low density residential districts. The Hebrew Home proposal, which would add 340 apartment units in multi-family buildings up to eight stories high, is our case in point. But that is only the example we are familiar with; no doubt there are other similar proposals in the wings.

We recognize that CCRCs would not be as-of-right in R1 and R2 districts. But even if they are identified as subject to discretionary approvals, they will come. Indeed, as Sherida Paulson pointed out, once the *possibility* exists to create dense and highly profitable multi-family housing in areas previously barred to them, developers will line up to seek approvals for CCRC projects. By opening R1 and R2 districts to these developments, the rezoning will constitute an *incentive* to change fundamentally the limited number of low density residential communities in the City.

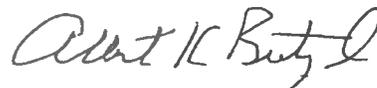
And that is the nub of the problem. Allowing CCRCs in R1 and R2 districts will change market dynamics, ensuring that low density neighborhoods, of which there are all too few, will disappear over time. Zoning that excludes multi-unit housing is the only reason such neighborhoods continue to exist; otherwise, given the economics of the market place, those parts of Riverdale and other low rise residential communities that have been protected would look like the high rise walls of buildings that have grown up elsewhere. We believe very strongly that if multiple family housing in the guise of CCRCs or any other categorization is permitted in R1 and R2 districts, those communities and the values they represent to New York will be lost. The action that the City is considering involves, then, a fundamental policy decision that cannot be glossed over on the grounds that future approvals will be discretionary.

We also believe that there is no need to accommodate CCRCs in low density residential neighborhoods, given the many other locations within the City where they can be sited consistent with the existing community character.

Even if that were not the case and there were somehow a compelling need to allow CCRCs in R1 and R2 districts, the fabric of the neighborhoods could be maintained if the residential bulk regulations applicable in the districts also governed the CCRC facilities. Up to now, however, there has been no indication that such an approach is under consideration.

Once again, thank you for taking the time to meet with us. Needless to say, we would be pleased if the points we have identified made a difference in the Department's thinking and proposals. Whether or not they do, we expect to participate in the ongoing legal and political process.

Sincerely,

A handwritten signature in black ink that reads "Albert K. Butzel". The signature is written in a cursive style with a large, looped initial "A".

Albert K. Butzel

cc.: Anita Laremont, Esq.
Ms. Laura Smith
Mr. Juton Horstman
Mr. Shawn Brede

RIVERDALE COMMUNITY COALITION

riverdalecommunitycoalition@gmail.com

STATEMENT REGARDING - ZQA – 12-16-15

I am speaking on behalf of the Riverdale Community Coalition.

We endorse the objective of increasing affordable housing opportunities for senior citizens and families, wherever appropriate. However, ZQA is severely flawed and raises a significant issue as to the integrity of the process.

We object to the proposed changes in the City Zoning Resolution that would allow 6 story buildings known as Continuing Care Retirement Communities to be located in R1 and R2 districts.

More specifically we protest an amendment within the Mayors rezoning plan (ZQA), which would allow the high rise CCRC proposed by the Hebrew Home of Riverdale on a site of more than 10 acres to be accomplished by way of a City Planning Commission Authorization process, thereby avoiding compliance with ULURP and review by the City Council. This manipulation of the zoning resolution is shocking.

By Slipping in this provision, City Planning and the De Blasio administration clearly intend to facilitate, accelerate and ultimately ensure approval of the Hebrew Home CCRC,

The Hebrew Home's luxury apartment styled development, which FOIL results show apartments starting at \$725,000 plus a hefty maintenance charge starting at around \$4500 per month, is hardly what we might expect to find under the zoning for quality and "AFFORDABILITY".

DCP is seeking to squeeze the project through a loophole that applies only to that project, but will have citywide ramifications. The stakes are high for R1 and R2 districts. Unless the Mayors ZQA proposal is severely modified, we can expect other similar institutions to take advantage of the loophole and similar projects to follow.

We believe that the proposed amendments and the consequences of this particular "10 acre clause" will be the antithesis of what Northwest Bronx communities have fought to achieve in our 197 a plan. This would provide an incentive for developers to assemble land in R1 and R2 districts, in and out of SNAD districts throughout the city and to build, opening the door to the vastly over-scaled CCRC project being planned and those waiting in the wings. The Riverdale Community Coalition believes that as a fundamental matter, apartment buildings are incompatible with and do not belong in low-density residential districts, of which there are all too few in the City.

We urge the City Planning Commission and City Council to reject the ZQA proposal and to protect the character and scale of our community and other low density areas throughout NYC. PLEASE VOTE NO.

*The paragraph below is for reference only-ZQA**

R1 and R2 districts – In these low-density, single-family zoning districts, long-term care facilities would only be permitted through discretionary actions intended to ensure the facility is compatible with the area's character. For large campus-like sites over 10 acres, a City Planning Commission authorization would be required (Section 22-42). For smaller sites, a Commission special permit (Section 74-901) would be necessary.

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Submission of Albert K. Butzel, Counsel for the Riverdale
Community Coalition, to the City Planning Commission
on the Zoning for Quality and Affordability Proposal

Public Hearing, December 16, 2015

My name is Albert Butzel. I make this submission on behalf of the Riverdale Community Coalition ("RCC") in opposition to the zoning amendments under the ZQA proposal that, if enacted, would:

- (1) permit multi-unit, multi-story apartment buildings for well-to-do seniors (styled as CCRCs) to be located in low density (R1 and R2) residential districts, and
- (2) allow one such project – the 340-unit development proposed by the Hebrew Home in Riverdale – to be constructed in an R1-1 district without complying with ULURP so as to insulate it from community board review and the ultimate approval of the City Council.

RCC also submits that insofar as the amendments described above are involved, the proposed action does not comply with the State Environmental Quality Review Act because of the failure of the EIS to include an in-depth analysis of the Hebrew Home project, which, as the Department well knows, has a fully-developed proposal for the Riverdale site and is waiting only on the passage of the amendments to file for City Planning authorization.

RCC is a community organization that has come together in an effort to protect the character of the Riverdale neighborhood in which its members live and, more specifically, to oppose the Hebrew Home project in its current form and to seek a resolution that will ensure the compatibility of the project with the fabric of the community and its Special Natural Areas District classification. Because the amendments identified above would facilitate the development of the project in its current form, RCC has a special interest in the ZQA process.

The Fundamental Issue of Compatibility

There are a relatively few R1 and R2 districts in the City, but that does not undercut their importance. To the contrary, these districts provide New York and its residents with both diversity and options in their choice of living environments. They are areas of low-rise single-family homes, with enough open space for trees and gardens and lawns. They represent a kind of oasis in our urban landscape and as

such attract and hold within the City limits citizens who might otherwise depart to the suburbs. They are also fragile and depend on the continued low-rise, low-density character of the neighborhood. A few out-of-scale buildings can be fatal, because they become the precedent and economic driver for the next one. A collection of out-of-scale structures is all the more insidious.

Until now, City zoning has recognized this reality. Multi-unit, multi-storied apartment buildings have been excluded from R1 and R2 districts. They can be built in all other residential districts – from R3 through R10. But they are not allowed in low-rise, low-density neighborhoods, because they are basically incompatible with the character and fabric of those neighborhoods. The Hebrew Home CCRC project, which would add 340 apartment units in multi-family buildings up to six stories high, is our case in point. But that is only the example we are familiar with; no doubt there are other similar proposals in the wings.

RCC believes that if multi-unit multi-story buildings are permitted in R1 and R2 districts under the guise of “affordable” senior housing, it will be the camel’s nose under the tent. Once the *possibility* exists to create dense and highly profitable multi-family housing in areas previously barred to them, developers will line up to seek approvals for CCRC projects. By opening R1 and R2 districts to these developments, the rezoning will constitute an *incentive* to change fundamentally the limited number of low density residential communities in the City.

And that is the nub of the problem. Allowing CCRCs in R1 and R2 districts will change market dynamics, ensuring that low density neighborhoods, of which there are all too few in the City, will disappear over time. Zoning that excludes multi-unit housing is the only reason such neighborhoods continue to exist; otherwise, given the economics of the market place, those parts of Riverdale and other low rise residential communities that have been protected would look like the high rise walls of buildings that have grown up elsewhere. RCC believes strongly that if multi-unit housing in the guise of CCRCs or any other categorization is permitted in R1 and R2 districts, those communities and the values they represent to New York will be lost.

RCC also believes that there is no need to accommodate CCRCs in low density residential neighborhoods, given the many other locations within the City where they can be sited consistent with the existing community character. Indeed, our group experience is that as contrasted to senior developments in the suburbs or the countryside, most urban CCRCs are multi-story buildings usually located in dense neighborhoods with easily accessible services and entertainment to minimize the need for driving. The R1 and R2 districts that the proposed ZQA amendments would open to CCRCs are the opposite of that.

I want to emphasize that RCC believes that CCRCs are an important form of senior housing that should be permitted and encouraged in New York City. But they should not be permitted and encouraged at the expense of low density residential neighborhoods. As just noted, there are many other areas where they can be

developed consistent with the fabric of those neighborhoods. Nor can they be justified under the general rubric of “affordable housing” which seems to be driving the ZQA amendments. In some cases, CCRCs may be affordable to middle income seniors. But in most instances, they will be affordable only to the well-to-do. That is certainly the case with the Hebrew Home project, where the cost of buying in to the least expensive unit will be \$750,000, with monthly maintenance charges of \$4,500 and many standard “extras” adding to that. It may be convenient to label CCRCs as a form of “affordable housing” – it may be politically expedient to do so – but the realities are the opposite of that.

In summary, because multi-unit, multi-story housing is incompatible with low-rise low-density residential communities, it has until now been excluded from R1 and R2 residential districts. The prohibition should not be lifted in the name of affordable housing (the more so because most CCRCs are not “affordable”). There are many other locations in the City where CCRC housing and care can be provided without wreaking havoc with a neighborhood’s character and fabric. This is not the case with R1 and R2 districts. The City should protect them by removing from the ZQA the sections that would open such districts to CCRCs.

The Hebrew Home Special Amendment

If, against all reason, CCRCs are to be permitted in R1 and R2 districts, most of them will have to obtain special permits under ZR 74-901. This will require them to go through the ULURP process, including review by the community board and the borough president and, most importantly, the absolute right of the City Council to reject or modify the project in response to public sentiment.

However, this would not be the case with the CCRC proposal that the Hebrew Home is standing by to file. As now constituted, the development would include 340 independent living units for seniors – that is, fully equipped separate apartments with the same facilities and amenities found in a typical City apartment. Some of these units would be located in buildings on the Hebrew Home’s existing campus, which is zoned to allow this kind of development. But up to 200 new apartments would be located on an adjacent 14-acre parcel, which the Hebrew Home acquired four years ago and which was at time, and is now, zoned R1-1 residential, limiting development to single-family homes 30 feet or less in height on lots of at least 9,500 square feet. The apartments on this parcel would be contained in three buildings rising as high as six stories and laid out in a way that would create a wall of stone and glass across the northern part of the site. The parcel is directly across from two groups of single-family homes that are typical of this section of Riverdale and within hailing distance of many others. Given the size of the development and the height and expansiveness of the new buildings, the change in the character of the area would be substantial. In addition, the only vehicle access for the project – and 300 new parking spaces are proposed – would be via Palisade Avenue, a narrow, twisting roadway without sidewalks, adding to the potential adverse impacts.

RCC submits that the Hebrew Home proposal is the archetypical kind of project that should be subject to full ULURP review. It would involve the introduction of a new use never before permitted. That use would be of a wholly different kind and scale. The proposed development would be outsized with its 340 apartment units. The project is opposed by a significant part of the Riverdale community and is, at the least, highly controversial throughout it. The community board has expressed its concern, as has the local Council Member. In light of all this, the Commission would be blinding itself if it treated the matter as simply one of good planning which it alone could decide. There is a clash in values in play here, and it would be wrong to exempt the project from legislative review, which can best represent, recognize and resolve the conflicting values.

Yet this is what the ZQA amendment of ZR 22-42 would do. Under that newly-proposed section, the Hebrew Home project would not be subject to ULURP (and thus not subject to community board and City Council review) because it would be located on a lot of more than 10 acres. Instead, all that would be required is an "Authorization" by the City Planning Commission. This would take the ultimate decision out of the hands of the City Council, where it should rest.

Moreover, the proposed ZR 22-42 exemption makes no sense *even from a planning perspective*, since, as in this case, the larger the lot size, the larger the development that is likely to be proposed. If smaller CCRCs are subject to special permit requirements (and thus to ULURP), then certainly a huge project like that proposed by the Hebrew Home should require such a permit. Compatibility does not depend on the size of the lot, but on the size of the development. Furthermore, the larger the size of the parcel, the more likely it is to be located in an area with large amounts of open space and natural features -- exactly the situation that exists on and surrounding the Hebrew Home lot. All of this underscores the irrationality of the exemption that the proposed amendment of ZR 22-42 would offer. This Commission should reject the exemption and modify the amendment accordingly.

There is also a suspect history of the proposed exemption that should lead the Commission to reject it, not because there has been any wrongdoing but due to the appearance of favoritism. The Hebrew Home proposed its project three years ago after first consulting with the City Planning Department and securing its guidance. The initial proposal was to amend the zoning on the 14-acre parcel to change it from R1-1 to R4. This was greeted with screams of dismay from the Riverdale community, which had struggled for years to maintain and strengthen the low-density residential zoning, succeeding through the adoption of a 197-a plan and a subsequent upzoning to require larger lot sizes and less density. The initial proposal ended up DOA and the Hebrew Home was required to go back to the drawing board. After further discussions with DCP, it came up with the idea of amending the Special Natural Areas District zoning to allow an override of both the R1-1 zoning and certain provisions of the SNAD. This resulted in an even louder outcry from the community and its elected officials, and that approach was also dropped.

As its next attempt, the Hebrew Home, backed by the City Planning, tried to fit its project in under existing use categories in the Zoning Resolution, contending that the proposed 300 plus units of independent living apartments qualified as a "health related facility." This led to a complex and drawn-out series of interactions with DCP and the State Department of Health that culminated in the Hebrew Home being transformed into a CCRC on paper (its official new name is "River Spring Health") and securing a Health Department letter that the CCRC was a health related facility of some sort. With this letter in hand, the Hebrew Home, accompanied and supported by DCP staff, asked the Department of Buildings to agree that the proposed project qualified as a "health related facility" under the City Zoning Resolution and could be developed as proposed on the R1-1 parcel.

DOB demurred, rejecting the position urged on it by the Hebrew Home and DCP and finding that the proposed development was one for multi-family housing in a residential district that excluded it. As a consequence, the Hebrew Home, which had its plans in place and was ready to file them formally with City Planning, had apparently reached a dead-end. The result was that in its proposed ZQA amendments, DCP included provisions that categorize CCRCs as a permitted use and allow them to be developed in residential districts, including in low-density R1 and R2 districts, even though multiple-family, multiple-story housing had never before been permitted.

RCC, together with the Riverdale Nature Preservancy, had two meetings with DCP staff to discuss the Hebrew Home project, in the second of which they tried to persuade the agency that CCRCs should not be allowed in R1 and R2 districts due to their fundamental incompatibility. The staff generally defended the idea of allowing these developments in the low-density districts, subject to certain protections. At the second meeting, which took place two weeks before the Department issued the text of the proposed ZQA amendments, the staff emphasized that the principal protection would be to subject all CCRCs to special permit procedures, requiring full ULURP review. The staff identified no exceptions and never mentioned a 10-acre exemption, even though the focus of the meeting was the Hebrew Home project. Those of us present at the meeting were discouraged by the staff's seeming intransigence on the issue of permitted use, but at least reassured that the Hebrew Home development have to go through the ULURP process.

Two weeks later, the text off the ZQA amendments was released, and upon a close reading, RCC and RNP discovered the ZR 22-42 exemption for CCRC located on parcels of 10 acres or more.

I hardly need say how upset we were. We believed (and still believe) that this exemption was devised at the urging and for the benefit of the Hebrew Home. Given the mounting political opposition to the project, there was every reason for the Hebrew Home to try to keep the proposal from coming before the community board and being subject to the City Council's approval. It no doubt understood that this could be avoided if all that was required was an Authorization by the City Planning

Commission. And for whatever reasons, DCP went along with that approach via the 10-acre exemption. As I have already emphasized, that exemption is unsupportable from both the political and planning perspectives. It is also highly suspect. Whatever the Commission concludes regarding the appropriateness of allowing CCRCs in R1 and R2 districts, it should reject the ZR 22-44 exemption.

I include with this submission copies of some of the correspondence between DCP staff and me regarding the Hebrew Home proposal and the ZQA amendments. I also include copies of (1) the letter from the NYS Department of Health in which it responded to the Hebrew Home's request to be categorized as a health related facility and (2) the letter I received from the Department of Building notifying me that it had rejected allowing CCRCs in R1 and R2 districts as health related facilities under current zoning. The documents are arranged in chronological order.

The DEIS

The DEIS does not evaluate the environmental impacts of the Hebrew Home proposal. It justifies this failure as follows:

Because it is not possible to predict whether a CPC special permit would be pursued on any specific site in the future, the RWCDs does not include specific development sites that might receive the Special Permit for Long-Term Care Facilities in [R1 and R2] districts. Instead, a conceptual analysis is provided to generically assess the potential environmental impacts that could result from such development. (DEIS, Chapter 1, p. 89)

In the case of the Hebrew Home project, this justification is erroneous in two respects.

First, under the ZR 22-44 exemption, the project would not be required to go through the Special Permit/ULURP process. It would instead proceed by City Planning Commission Authorization; and as the DEIS itself points out, no health care facility subject to an Authorization has ever required an EIS; they have *all* been approved on the basis of CEQR negative declarations. (DEIS, Chapter 1, p. 37). Thus, it is not merely likely, but inevitable, that if the ZQA amendments are adopted without focusing on the environmental impacts of the Hebrew Home project, those impacts will never be evaluated in depth but will be passed off as insignificant.

Second, as DCP knows from its collaborative work with the Hebrew Home, the proposed CCRC development is completely predictable. The specifics of the project have been shared for many months with the DCP staff, the Hebrew Home has time and again reaffirmed its intention to proceed with the development of 340 units of multiple unit multi-family housing on the site to the south of its existing facilities, and the formal application awaits only the adoption of the zoning amendments meant to allow it. Given these realities, City Planning has ample information to undertake a site

specific analysis of the environmental impacts of the proposal. To fail to do carry out such an evaluation in the EIS for the ZQA amendments not only constitutes a violation of the SEQRA/CEQR mandate to identify and address the potential impact on the environment, it also represents an impermissible segmentation of the Hebrew Home project from the governmental action (i.e., the zoning amendments) that will make it possible. It is RCC's position that City Planning Commission cannot act on the ZQA amendments without issuing a supplemental draft EIS that addresses the potential environmental impacts of the Hebrew Home project.

Conclusion

For the reasons set forth above, the Commission should reject the ZQA amendments that would open low-density residential districts to multi-unit, multiple-story apartments, whether in the form of CCRCs or in any other form. If, contrary to RCC's position, the Commission decides to allow CCRCs in R1 and R2 districts, *all* such developments should be required to obtain special permits, regardless of the size of the parcel on which they are proposed to be locating. The 10-acre exemption proposed as part of the amendment of ZR 22-44 should be rejected. Finally, before the Commission takes any action on the ZQA amendments, it must issue a draft supplemental EIS that addresses the impacts of the Hebrew Home project and allow the opportunity for public and agency comment as required by SEQRA/CEQR.

Respectfully submitted,



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August 21, 2014

Hon. Carl Weisbrod, Chair
City Planning Commission
22 Reade St,
New York, NY 10007

Re: Continuing Care Retirement Communities
Section 90-74 of the Zoning Resolution
Hebrew Home of Riverdale

Dear Chair Weisbrod:

I represent the Riverdale Community Coalition, a neighborhood organization with more than 800 supporters who oppose the proposed Hebrew Home expansion in its current form.

Yesterday afternoon, Sherida Paulsen, Barry Willner, Martin Zelnik, Dick Baldwin and I met with Carol Samol and Juton Horstman of the Bronx Office and Anita Laremont to discuss the Hebrew Home's application and, in particular, its recently-stated intention to seek approval of its development as a "health related facility" under Section 74-90 of the Zoning Resolution. In advance of the meeting, Michael Kwartler and I had submitted a memorandum explaining why, in our view, the proposed development of more than 300 units of independent living apartments did not constitute a "health related facility" within the meaning of the *City Zoning Resolution* and why, as a matter of policy, we believe it would be inappropriate to try to squeeze the development into that category. I enclose a copy of that memorandum for your consideration.

To our surprise and consternation, our take-away from yesterday's meeting was that you and the Department are seriously considering accepting and processing the Hebrew Home's application under Section 74-90. If that is the case, I respectfully ask that you meet with me and the others identified above before you make any final decision.

In this regard, I want to focus on one point in particular. We do not oppose Continuing Care Retirement Communities. To the contrary, a number of us, myself included, have had parents who lived out their last years in CCRCs, and we recognize that there should be a place for such developments in the City. The critical question for the Coalition is where they should be permitted. As to that issue, we do not believe that a decision should be made via a strained interpretation of Section 74-90 in a single case in Riverdale. Instead, the issue should be studied in depth and then be the subject of full ULURP review with the final decision resting with the City Council. If, instead, Section 74-90 is "interpreted" by the Department to allow a CCRC in the Hebrew Home case, that interpretation will apply across the City, without any opportunity having been given for public input or, equally important, for the political process to work its will.

It is, I think, important to emphasize that the development proposed by the Hebrew Home does not constitute a "community facility" as that term is generally understood. What is involved is 306 independent multi-family apartments, each with its own kitchen facilities, living rooms, bedrooms, dining areas and bath-rooms – a development no different in terms of impacts than other multi-family projects which are not permitted in R1 and R2 districts. Moreover, the units will be individually-owned and sell for \$500,000 or more apiece – hardly the type of housing that can be said to confer a community, rather than a private, benefit. To classify the project as a community facility could also have significant financial consequences for the City, because the development might well be taken off the property tax rolls. In short, rather than the Commission jumping headlong into uncharted waters and concluding that apartment buildings should be called non-profit "community facilities," the land use, tax and revenue implications for the City cry out for the careful evaluation of the City Council.

I also note that many, if not most, CCRCs in urban areas are located in high-rise buildings in commercial or dense residential areas. My mother, for example, lived out her life in a high-rise CCRC in downtown Seattle and my mother-in-law did the same in downtown Houston. CCRCs do not need to be sited in low-density residential areas, nor, in our view, does it make sense that they should be.

Finally, I emphasize that the Riverdale community struggled for years to achieve the R1-1 zoning and the protections of the Special Natural Area regulations, as reflected in the 197a plan for the area approved by the Planning Commission and the Council in 2003. Today, Riverdale remains one of only a few neighborhoods in the City where residents have had reason to rely on the low-rise character and limited density of their community. The prospect of the much denser Hebrew Home development with buildings rising to six stories or more is very disconcerting, to that point that many homes opposite the Passionist property are up for sale. The threat to the stability one of New York's valued neighborhoods is very real.

Again, I urge you not to shortcut the process for reviewing the place of CCRCs in the City. And on behalf of the Coalition, I respectfully ask for the opportunity to meet with you before the Department makes any decision on the applicability of Section 90-74 to the Hebrew Home project.

Thank you for your consideration.

Sincerely,



Albert K. Butzel

cc.: Anita Laremont, Esq.
Carol Samol
Juton Horstman

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To: Department of City Planning
From: Albert Butzel, Michael Kwartler *AKB, MK*
Date: August 13, 2014
Re: Hebrew Home Expansion

The Hebrew Home is proposing to develop 306 units of independent living apartments on its existing campus and the adjoining Passionist Property which the Hebrew Home now owns. The zoning on the Passionist Property is R1-1, which limits as-of-right development to single-family residential, with certain community facilities allowed by special permit,

The Hebrew Home initially sought approval for the development via an amendment of the existing zoning on the Passionist Property to R4. Deterred from that approach, the Home apparently considered a text amendment as a possible solution, but has not pursued that scenario.

Instead, its April 2014 submission to the Department, the Hebrew Home, though its attorney, has indicated that it intends to seek City land use approvals pursuant to Section 74-90 of the Zoning Resolution as a "health related facility" permitted in residential districts (including R1-1 districts) by special permit. In support of its position, the Hebrew Home has submitted a letter from the New York State Department of Health, the relevant part of which reads:

I have been advised that the term health related facilities as defined in Section 10NYCRR 700.2 of the NYS Hospital Code is an outdated term that does not apply to anything that exists today. I can confirm for you that a CCRC [Continuing Care Retirement Community] is a health related facility based on the fact that it is regulated under Article 46 of the Public Health Law and under NYS Insurance law as a health care product.

It is on the basis of this slim reed that the Hebrew Home apparently hopes to persuade the Department that the development of the 306 new apartment for independent living, taken together with the existing nursing home and related structures on the Hebrew Home campus, qualify as a "health related facility" and as such can be approved pursuant to Section 74-90 of the Zoning Resolution.

We think it is clear that the position of the Hebrew Home cannot be sustained on the basis of the DOH letter or any other grounds. *The critical issue is what the City Zoning Resolution intends by the term "health related facility," not what is basically a lay statement by an official of the Department of Health.* In this regard, it is important to note that the only citation in the DOH letter to the term "health related facility" is to say that under State law, the term is meaning-less. The further sentence that a CCRC is a "health related facility" is not based on any statutory provision or language but is used in an everyday sense that could be applied to any institution that provides health care. Nor is there anything in the DOH letter (or any other source) to suggest that the development of 306 apartments for private living are comprehended by the term "health-related facility" or are or should be exempt from the restrictions of the City Zoning Resolution applicable to multi-family housing.

Turning to the language of Section 74-90 of the Zoning Resolution, neither "nursing home" nor "health related facility" is a defined term under the Zoning Resolution. However, they are commonly understood to be something other than independent living apartments. Moreover, these terms were introduced into the Zoning Resolution in or before 1973, when independent living apartments hardly existed. So what legislative history there is does not support categorizing the proposed apartment development as "nursing home or health related facilities." On this basis alone, the Hebrew Home's proposal to apply for approvals under Section 74-90 should be rejected.

What is actually involved here is the development of multi-family housing, primarily on the Passionist Property, in an expansion of the Hebrew Home's existing facilities and service. What will result according to the Hebrew Home is a Continuing Care Retirement Community. This may be so, but that does not, by conjunction or otherwise, transform the multi-family development into a "health related facility" or, indeed, anything else than what it is.¹

There is no reference to a CCRC in the Zoning Resolution, and for good reason. CCRCs simply did not exist when Section 74-90 and other provisions for

¹ In the Legislative Findings that accompanied the adoption of Public Health Law Article 46, a CCRC is described as an attractive and innovative *residential* alternative for older New Yorkers . . ." (emphasis added). A reading of the materials prepared by the Hebrew Home also underscores the residential apartment nature of its proposed CCFC, clearly evidencing its intent to market the property as higher end residential housing for seniors.

elderly housing and nursing homes were added to the Resolution. As a result, the appropriateness of their siting in low-density residential areas has never been addressed by City Planning or the City Council. Moreover, the multi-family components of the Hebrew Home's CCRC involve the same kind and magnitude of impacts as any multi-family development – impacts that have been found to be incompatible with, and are therefore prohibited in, R1-1 and other low-density residential areas. This finding, reflected in the most fundamental fabric of the City's zoning, should not – and in our view, legally cannot – be overcome by an interpretation that would allow multi-family uses to sneak in under the guise of being “health related facilities.”

The broader implications of such an interpretation in this case underscore the urgency of rejecting it. For if the Department and City Planning concluded that the 306 apartments proposed by the Hebrew Home qualified as “health related facilities” under Section 74-90, the consequence would be to open every residential zone in the City to the influx of multiple family uses, subject only to the grant of special permits. This would constitute a rejection of the protections residents have long relied on zoning to provide and would, in a very real sense, represent a breach of trust on the part of the City.

If CCRCs are to be permitted as self-contained units (rather than being reviewed on a component-by-component basis), that is a decision that should only be made after the issue has been studied, proposals have been developed and debated and the matter has been fully reviewed under ULURP, including by the City Planning Commission and City Council. We believe the Council is unlikely to allow CCRC multi-family development in low-density residential areas, but whatever the outcome, it is the Council that should have the final word. It would, we submit, be both legal error and a mistake of policy to effectively rewrite an important section of the Zoning Resolution by allowing the Hebrew Home to proceed under Section 74-90 in seeking approval for the 306 multi-family independent living apartments it has proposed.



DEPARTMENT OF CITY PLANNING
CITY OF NEW YORK

OFFICE OF THE DIRECTOR

September 23, 2014

Albert K. Butzel, Esq.
Albert K. Butzel Law Offices
249 W. 34th Street Suite 400
New York, NY 10001

Dear Al:

Thank you for your letter regarding the Hebrew Home proposal to develop a Continuing Care Retirement Community ("CCRC") on its Riverdale campus. I'm very glad that you agree with me that CCRCs are an important resource for serving aging populations. I firmly believe there is a place for these facilities in New York City. I appreciate your interest in the Hebrew Home CCRC proposal, and understand that you've met with DCP staff regarding your concerns. As you know, we are actively considering how best to proceed with this proposed action. In light of the many legal issues raised by the proposal, and because you have already had discussions concerning this matter with our General Counsel, Anita Laremont, I believe it would be most fruitful for you to continue to discuss your concerns with her.

I welcome your continued engagement on this matter.

Kind Regards,

A handwritten signature in black ink, appearing to read "Carl Weisbrod", written over a circular stamp.

Carl Weisbrod

C. Anita Laremont, Esq.
Carol Samol
Juton Horstman
(File #27513/#27515)



PO Box 1315 Old Chelsea Station New York, NY 10113-1315
website: www.savechelseany.org email: savechelseanyc@gmail.com

December 15, 2015

To: Carl Weisbrod, Chair, NY City Planning Commission
From: Save Chelsea
Re: The 'Zoning for Quality & Affordability' Proposal

Save Chelsea continues to VEHEMENTLY oppose The 'Zoning for Quality & Affordability' proposal now going through the public review process. If approved, it would greatly weaken neighborhood-zoning protections and significantly increase height limits for some new developments with little or no public benefit.

There is no reason for the city to encourage taller developments in residential neighborhoods that were specifically zoned to maintain certain contextual height limits. There is NO justification for the proposed across-the-board height increases of 5-20 feet for new developments, as they offer no public benefit, would undo hard-fought-for height limits that in many cases were compromises from those which communities sought, and would only serve to further erode neighborhood character. In Chelsea, as with other neighborhoods, **existing affordable housing** is currently and constantly under attack from what has been appropriately dubbed, "the violence of overdevelopment."

In fact, Save Chelsea is one of 87 groups that have joined a coalition called "New Yorkers for a Human-Scale City", calling for "an end to the violence that real estate developers have inflicted on our skyline, parks, public areas, and cityscape with the proliferation of over-scaled buildings." Significantly, the coalition includes groups from all over the five boroughs, who have taken a strong and united stand against the Mayor's ZQA for the reasons above, and because this proposed citywide zoning change is far too sweeping, is being rushed far too quickly, and would have harmful effects to existing affordable housing. It, therefore, threatens not only the historic fabric of our city, but the cultural fabric as well. As our District 3 Councilman, Corey Johnson, has said, "I do not think that there is a one-size-fits-all solution, which is (what's) currently before us..." And, as Greenwich Village Society for Historic Preservation further clarifies, "This is a one-size-fits-all citywide zoning change that fails to take into account local conditions, goals, or desires, limits the tools in our zoning tool box, and eliminates the leverage that local communities, their Councilmember, and their Borough President would normally have over a local rezoning (as opposed to a citywide zoning text amendment such as this)."

In the recent New York Times article "In Chelsea, A Great Wealth Divide," reporter Mia Navarro explores the rapid growth and gentrification of Manhattan's Chelsea neighborhood. She writes that the area has "undergone a dizzying economic transformation in the past two to three decades, with an influx of wealth affecting the residents of less means in both obvious and insidious ways. And that change shows no signs of slowing." Adding that, even now, "Today's Chelsea, the swath west of Avenue of the Americas between 14th and 34th Streets, could be the poster neighborhood for what Mayor Bill de Blasio calls the tale of two cities." ZQA would only serve to accelerate the attack on what is left of truly affordable housing, while giving developers even more latitude.

For all these and reasons, Save Chelsea implores you to oppose the misguided and misnamed 'Zoning for Quality and Affordability' proposal. In other words, Just say NO!

Lesley Doyel
Co-President, Save Chelsea



Selfhelp Community Services, Inc.
Selfhelp Innovative Senior Center
(Benjamin Rosenthal-Prince Street Senior Center)
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www.selfhelp.net

Testimony by Indira Prasad, a member of Selfhelp Innovative Senior Center

Good Morning. My name is Indira Prasad. I am a member and a volunteer Yoga teacher at Selfhelp Innovative Senior Center, located in Flushing, Queens. I am here today to testify from my personal experiences on how difficult it is to obtain an affordable senior housing apartment. I live on a fixed income of \$776. I pay \$508 a month to live in a basement, which is dark and often cold. I am afraid to complain to my landlord because if she throws me out, where else will I go?

I initially placed an application with NYCHA in April of 2012. I did not hear anything from them. I went to the NYCHA office in Queens in April of 2015. I was told that I had to re-apply and then call or write every 6 months to say that I am still interested. I am told that NYCHA has no available housing right now and the waiting list is very long.

My Selfhelp social worker is planning to help me apply for Selfhelp's Section 8 housing when applications open up again in January 2016. At that point, if I am lucky, my name can be picked in the lottery. But there are many people waiting, so most of us will have to continue waiting.

I feel like my hopes and dreams have been shuttered over and over again due to the rejections and endless waiting. I was told by some elderly friends who are in a similar situation to mine, that they have waited for 10 years or longer for an opening with NYCHA. Other seniors have told me that it is a waste of time to apply and re-apply because by the time NYCHA has an apartment for you, you are either in a nursing home or have died. I am not in the worst case scenario. Some of my friends live in even worse conditions than I do. It looks like a hopeless situation for seniors like me who have no stable place to live or any support. However I still have to try since there isn't any other choice. Otherwise I will be homeless if the landlord decides to sell the house or evict me. I often question why I have to go through such a struggle and hardship after I have worked hard all my life.

I have proudly called America my country for the past 36 years, even though I cannot even live comfortably in my old age. We, senior citizens, deserve and demand better living conditions with affordable housing. Here, I am asking the City Council members and the Mayor to understand where and how we live, so that you can realize the current housing crisis we are facing. Please help us by building more affordable senior housing.





Testimony by Pawn Pongsangthong

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*A not-for-profit, tax-exempt
social service organization
founded in 1936*

a beneficiary of
UJA Federation
of New York



Good morning, my name is Pawn Pongsangthong. I am 77 years old and live in Selfhelp's Scheuer House of Flushing with my 99 year old mother for the past 7 years. I am here today to tell you my story about living in an affordable senior apartment.

Before living at Scheuer House of Flushing, I lived with my mother in Elmhurst in a private apartment complex. The reason I wanted to move is because the rent kept increasing. Also the place where I lived, I did not feel safe especially for my aging mother. One day I heard a gunshot, which I thought was the TV but later the police came to my apartment and asked if I heard anything. This is when I decided it was time to move.

I tried to find another place to live with private apartments but my income was not enough and two places rejected me. A friend of mine told me about Selfhelp housing because her mother lived there and said it was very nice. I applied and waited for 3 years before I was accepted. Since living in Scheuer House of Flushing, I found it very beneficial for my mother and myself. I feel very safe living in senior housing. There is a security guard at night, there are emergency pull chords in the apartments in case we fall, and in the hallways there are railings. When the weather is bad I walk in the hallways to keep my knees from going stiff.

I am able to be the caregiver to my mother living in senior housing. I am able to participate in activities within the building and not have to worry if I will be able to get home in time to care for my mother. If anything should happen to her, her homecare aide will give me a call and I will be home in less than 5 mins. I am very active on the tenant council; I enjoy the social, mental, and physical activities that are provided within senior housing. I am young and feel that living in a safe Housing with all the different services will help me stay healthy and in the community.

I feel it is very important for this city to have affordable housing for all seniors. My mother and I are very lucky to live in Scheuer House of Flushing.



Testimony by Rosa Mae Borrow

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Good morning, my name is Rosa Mae Borrow. I am 87 years old living in Scheuer House of Flushing. I am here to tell you my story and why I feel that affordable senior housing is very important.

I first lived in Martin Lande House, Selfhelp's senior housing, back in 1993 with my husband. We moved there because my husband was aging and we used to live in a townhouse that had 3 flights of stairs in Corona. It was becoming very difficult for him to move about. Martin Lande had elevators and security. That was very important to us. We had a great time living in Martin Lande House. We enjoyed the community and the activities that were provided for us. I was very active as a tenant council and volunteer. My husband and I truly enjoyed our friends and neighbors because all of them were so nice. With the passing of my husband in 1998, I felt comforted by my neighbors and because of the activities and committees I was on in Martin Lande, I was able to grieve for my husband in more positive way. After 19 years of living there, I moved to Maryland because of my mother. She needed help so I moved there to be with her since I was alone at this time.

Maryland was a different place. It was too quiet and I missed my friends. I was also aging so after a few years living in Maryland, I decided to move back to NYC. I applied back to Selfhelp housing and waited for an apartment. I was very lucky that an apartment was available after 2 years of waiting but it wasn't back at Martin Lande, it was at Scheuer Housing of Flushing. It didn't matter because it was still the community I was going back to. I still see my old friends and I truly believe that we seniors need to have a place where we feel safe and that there are services that are provided to us. It helps us in our daily lives to be active whether it is mentally or physically, living in Scheuer House of Flushing has given that to me.

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I tried to find another place to live with private apartments but my income was not enough and two places rejected me. A friend of mine told me about Selfhelp housing because her mother lived there and said it was very nice. I applied and waited for 3 years before I was accepted. Since living in Scheuer House of Flushing, I found it very beneficial for my mother and myself. I feel very safe living in senior housing. There is a security guard at night, there are emergency pull chords in the apartments in case we fall, and in the hallways there are railings. When the weather is bad I walk in the hallways to keep my knees from going stiff.

I am able to be the caregiver to my mother living in senior housing. I am able to participate in activities within the building and not have to worry if I will be able to get home in time to care for my mother. If anything should happen to her, her homecare aide will give me a call and I will be home in less than 5 mins. I am very active on the tenant council; I enjoy the social, mental, and physical activities that are provided within senior housing. I am young and feel that living in a safe Housing with all the different services will help me stay healthy and in the community.

I feel it is very important for this city to have affordable housing for all seniors. My mother and I are very lucky to live in Scheuer House of Flushing.

SKA Marin

Testimony in Support of NYC Planning Proposals for Zoning for Quality and Affordability for Senior Housing

Good morning. My name is Sydelle Knepper and I am Founder and CEO of SKA Marin, an affordable housing firm that develops, owns and manages affordable housing with a specialty in the creation of quality senior housing communities. I am also Co-Chair of the New York Housing Conference (NYHC) and I am pleased to confirm through the testimony of my Co-Chair, Carol Lamberg, support of the City's proposals for Zoning for Quality and Affordability and Mandatory Inclusionary Housing.

I would like to focus my testimony today on senior housing and the critical shortage that the City of New York faces in coming to terms with its growing elderly population. While SKA Marin has been involved in the creation of several thousand units of senior housing, there is still growing need in every community. Today, seniors are living longer. They are unlikely to move to other localities when they retire. Their children and families may not live near them. And, for many, social security and pensions do not cover the increase in living expense.

Aging in place is what many seniors would like to do. They would like to stay in their communities where their friends, social networks, houses of worship and familiar landmarks exist. Yet, the affordable housing that should be there for them when they need a more secure environment, a handicapped accessible apartment or easy access to services is not readily available. High land and construction pricing and a shortage of project based Section 8 vouchers are problems that are not easily solved. However, when we identify potential sites, current zoning requirements mandating a certain amount of parking means that we cannot build more apartments, or more open space or more community facility space that house needed services. Parking spaces are expensive and in SKA's projects are not widely used by residents. In the case of a building having only a limited number of parking spaces, this still impacts cost, open space and other amenities.

I would like to present an example of the impact of current zoning. SKA completed Riverway Apartments, 114 + 1 one bedroom apartments for seniors in

Brownsville, Brooklyn. The building has some wonderful amenities including a 10,000 square foot senior center run by Catholic Charities that converts into a daily after school and homework program run by our partners, the Calvary Church of God. Riverway Apartments is shaped like a U and includes a beautiful secure courtyard garden with a fountain. Due to the 17 parking spaces that the building was required to have, and which is used only by staff and senior center employees, SKA had to cut the size of the outdoor space. To disguise the parking yet still allow it to be used, part of the garden has pavers with grass infill that can still be parked on. This portion of our garden space cost more and is not like a natural lawn. Other restrictions included a zoning height requirement that mandated the development of only 6.5 floors though there is a high rise complex just a block away from Riverway Apartments. To place this restriction in its context: Riverway Apartments received over three thousand applications for only 114 apartments.

I understand that the idea of building senior housing without parking seems, at first glance, to compromise those seniors who still own cars and drive or have family members who visit and need parking. However, most senior buildings do offer, through community facility spaces that house service providers and programs, access to transportation for shopping and other needs. Supportive services, for example, such as meals, recreation, referral for benefits, and health care counseling is available on-site. At SKA's senior housing, our security system offers immediate referral to EMS so residents do not have to worry about using their own transportation to get to emergency health care.

We have never had a complaint from any family member of a resident that they could not park on premises. What we always do hear are requests for applications for our housing. We are building 203 units of senior housing in East Harlem now and though the project is not expected to rent-up until the latter part of 2017, every day we receive inquiries. To benefit our seniors, the City of New York needs to make its zoning regulations more responsive to the development of best practice of senior housing and the ZQA is a good step in this direction.



**Testimony of the
Supportive Housing Network of New York
For the New York City Council Hearing on
Zoning for Quality & Affordability and Mandatory Inclusionary Zoning
December 16, 2015**

Good afternoon. My name is Robin Pagliuco, and I am here on behalf of Laura Mascuch, Executive Director for the Supportive Housing Network of New York. I am here today to testify in support of the Zoning for Quality and Affordability (ZQA) and Mandatory Inclusionary Zoning (MIZ) proposals put forth by the Department of City Planning to facilitate the Mayor's Housing New York plan.

The Supportive Housing Network of New York is a statewide membership organization, representing more than 200 nonprofit agencies that build, operate and provide services in housing for homeless, disabled and at-risk New Yorkers. Our members provide permanent, affordable housing with on-site services, including case management, mental health services, substance abuse counseling and employment programs to over 50,000 households statewide, 32,000 here in New York City. New York continues to lead the nation in the production and innovation of supportive housing, the only proven solution to ending homelessness.

The Network is pleased to join our colleagues from NYSFAFH, the New York Housing Conference, Citizens Housing Planning Council, Association for Neighborhood and Housing Development, AARP, and many other affordable housing advocates in supporting Zoning for Quality and Affordability and Mandatory Inclusionary Zoning. New York City is in a housing emergency; with a city-wide vacancy rate of 3.5% and a vacancy rate of 1.8% for Extremely Low Income (ELI) households, NYC needs more affordable housing now. These proposals will facilitate the creation of more affordable units for a wider range of New Yorkers, enable a spectrum of affordable senior housing and care facilities to better serve New York City's seniors, and reduce unnecessary parking requirements.

Zoning for Quality and Affordability

This proposal offers several benefits to neighborhoods of New York. It updates zoning rules which have not kept pace with fire and building codes, new construction practices, or the City's commitment to build more affordable housing. It modernizes building envelope requirements enacted a generation ago, allowing for all available floor area ratio (FAR) to be used and will create better designed units. In addition, it allows for buildings that complement and enhance the neighborhood by promoting ground floors that are more inviting to retail along with courtyards and green space.

New York City's senior population is growing faster than available housing. In a tight rental market, seniors with fixed incomes have very limited options for housing. To serve our growing senior population, this proposal will enable more senior housing to be built across the city. This housing will be both affordable and accessible for seniors, allowing for innovative design to address their changing needs. To reflect the real needs of our seniors, parking requirements would be eliminated, allowing for the creation of more desperately needed units. This

proposal does not eliminate parking requirements in areas not served by public transportation, but it allows affordable and senior housing developers to only develop the parking that will actually be used.

This proposal does not take away any existing protections for landmarked or historic buildings, nor does it treat every neighborhood the same. It allows neighborhoods to retain their unique character while giving communities options to choose what is best for them. It will add more affordable units for a wider range of New Yorkers, create buildings that enhance the pedestrian experience and offer the opportunity for hundreds of seniors to live in safe and affordable housing.

Mandatory Inclusionary Zoning

As rents continue to rise, the typical renter's income is not keeping pace. Particularly for those with the lowest incomes, the tight rental market, real estate speculation and the deregulation of hundreds of thousands of rent-stabilized apartments are contributing to the housing emergency faced by many New Yorkers. Mandatory Inclusionary Zoning is a flexible tool the City Council can use to add permanent affordable units to any rezoning. By allowing averaging within the affordability requirements, the proposal allows for mixed-income buildings, which help to strengthen neighborhoods. Additional City subsidy can be leveraged to reach individual earning as little as \$18,150 per year. These units will be affordable in perpetuity, creating a valuable resource for many generations of New Yorkers.

In closing, The Network supports both Zoning for Quality and Affordability and Mandatory Inclusionary Zoning. Both proposals offer flexibility, opportunity and possibility for neighborhoods across New York. Thank you for the opportunity to testify.

Respectfully Submitted By:

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AIA
Brooklyn



AIA
Queens



AIA
Staten Island

TESTIMONY SUBMITTED BY
AMERICAN INSTITUTE OF ARCHITECTS
BROOKLYN CHAPTER
QUEENS CHAPTER
STATEN ISLAND CHAPTER

RE: ZONING FOR QUALITY AND AFFORDABILITY
DRAFT ENVIRONMENTAL STATEMENT

CEQR No.: 15DCP104Y

The Brooklyn, Queens and Staten Island Chapters of the American Institute of Architects representing over 1000 members have studied and discussed this complex zoning amendment since it was proposed last spring by the Department of City Planning. We are very aware of the lack of affordable housing in New York City. Many of our own families and clients live this reality; and we also understand that the very poorest citizens pay 50-60% of their incomes for housing.

We are supportive of the various changes that seek to encourage design flexibility and streetscape improvements to new buildings and text that allows for increased ground floor height. Similarly the changes to ease development of irregular lots and shallow lots are mainly a positive modification. We also support the changes to definitions of senior housing, assisted living and long term care that better reflect the lives of the elderly today. We also feel that a reduction in minimum unit size for affordable senior housing is beneficial toward increasing the number of dwelling units.

However, we have serious concerns about aspects of the proposed zoning amendment that we find weak or inadequate in terms of the goals of quality and affordability.

SENIOR AFFORDABLE HOUSING

The thrust of the amendment was to create more affordable housing for seniors. The mechanism to accomplish this was to increase height and density (FAR) in many zoning districts throughout the city. However developers need only provide 20% of the floor area for senior affordable housing in order to take advantage of the height and extra floor area. We believe that a higher ratio (50%) of senior affordable housing is necessary to provide the housing that the Draft Environmental Impact Statement (DEIS) documents show to be necessary.

INCREASES IN DENSITY

Because the DEIS is only required to measure the incremental environmental impacts of the proposed zoning amendment, it does not need to mitigate any impacts that exist as a result of the significant development of many neighborhoods which were rezoned or up-zoned over the past 15 years. City services and needed infrastructure have not kept pace with development and population growth. The buildings we design and renovate in New York City do not exist in a vacuum - they provide living spaces, commercial and institutional structures for the citizens. These citizens need quality mass transit, safe, well-maintained, adequate street and highway capacity for drivers, bicyclists and pedestrians. Parents need sufficient school seats, at all levels for their children. We cannot rely on developers to build the needed capacity for the Department of Education; nor can we rely on promises of new school construction in order to build larger projects. Citizens also need ample open space and recreational facilities, nearby. Brooklyn is still woefully short of parks (in spite of Brooklyn Bridge Park). And of course, the garbage always has to be collected and the water and sewer infrastructure has to be maintained. Simply put – when there are more people, more services are needed. We believe that today the City is playing catch-up in terms of providing the services needed and is now fiscally sound enough to devote resources to supporting the development we see all around us. Any new zoning that increases density must be accompanied an appropriate amount of investment and increase of services.

REAR YARD AND OPEN SPACE

We feel that the decrease in open space requirements in rear yards, lot coverage and shallow lots, while attractive to some owners and developers, will have negative impacts for light and air in residential construction. Contextual zoning districts that are adjacent to higher density districts will be especially vulnerable to the loss of light in rear yards (for example - R6B adjacent to the EC-1 on Fourth Avenue). A further added concern is that there is no way to predict or control the amount of development in a particular neighborhood or even on a street. In the case of senior affordable housing, open space is an important amenity for older residents. City Planning has suggested that a first floor roof could become common outdoor space but this is not mandated in the text.

AFFORDABILITY

To be more equitable, any zoning changes must ensure that the neediest citizens are not overlooked. While providing more affordable housing at all levels is necessary, safe affordable housing for the most fragile has far reaching benefits for the individual families and society in general. Half of all renters in NYC pay more than 30% of income for rent and half of those pay 54% or more for rent). We advocate that affordable senior housing be preferentially targeted toward the most burdened seniors.

PRESERVATION AND REGULATION OF SENIOR AFFORDABLE HOUSING

Affordable housing in New York City is a jumble of different programs regulated by different agencies. We are very concerned that senior housing units may not be preserved after the initial tenancy. The Department of City Planning is not a regulatory agency, but there needs to be accountability in order to preserve all affordable housing, senior or otherwise. NYS Attorney General Schneiderman's recent investigation of the 421-a affordable units provided by developers in exchange for tax reductions, revealed an alarming amount of non-compliance that have generated only modest fines.

LONG TERM CARE FACILITIES

The proposed 'long term care' definition would render blurred "uses" if enacted in R1 through R4 and R5A districts, which are meant for one and two family homes. The unintended result would create Multiple Dwelling use and high density throughout every residential zoning district in the entire city. The confusion of what is a health facility: nursing home, assisted living, hospital, clinics and community facilities with sleeping, only exacerbates the procedure for any DOB application. Long term care facilities, by definition, contain dwelling units and nursing beds. They are businesses and have an employment presence in neighborhoods. Low density neighborhoods with sparse public transit will be negatively impacted by this type of development.

FRESH FOOD STORES

The provision for fifteen foot high first floors as an inducement for "Fresh Food Stores" seems reasonable. However we have concerns about the enforcement of such a restriction once the initial fresh food store is no longer a tenant. Landlords may be tempted by tenants willing to pay higher rents than grocery stores. Obviously the increased height cannot be "given back" if there is no fresh food store operating. This goal, however laudable, does not belong in the Zoning Resolution. It might to make more sense to provide a tax reduction to the landlord who rents to a fresh food store.

PARKING REQUIREMENTS

Seniors have fewer cars and do less driving than the general population. However there needs to be further study to determine parking needs for senior housing and associated facilities. For example, do they require more visitors – medical care, social service and family visits? Long term care facilities have staff who commute to their jobs.

Anyone who drives or uses public transportation in the Brooklyn transit zone or Long Island City is aware of the serious congestion that has come with development. City Planning or City DOT has not addressed this in any meaningful way. It seems premature to reduce the parking requirements in the absence of data that supports it.

TRANSPARENCY

The amendment also reduces the amount of first floor transparency required from 70% where required to 50%. We are not opposed to the reduction, per se, but have a larger question about the effectiveness of first floor transparency requirements. Architects and city planners have long known that storefront activity contributes greatly to urban street life. The interesting store display, the inducement of merchandise "on sale" in a window, the glimpse of tables in a restaurant, the barber shop are part of the mercantile scene of a city that makes walking its streets so enjoyable. The glass storefronts we see today are too often covered with banal vinyl that contributes very little to the street scape. Rather than tinkering with the amount of transparency, we would suggest that some thought be put into making the transparency an effective part of the streetscape.

PLANNING

After a decade of zoning changes, we think it is time to do some comprehensive planning for New York City that involves communities in meaningful ways. Many Zoning Districts designations no longer have meaning when height and density allowances as well as BSA spot rezoning's can change an R-7, for all intents and purposes, into an R-8 or higher. A fine grained look at how districts have evolved over the past twenty years is overdue. This should not be a top down process. There are many instances where community involvement resulted in a better solutions – for example at Melrose Commons in the Bronx, Hoyt Schermerhorn in Brooklyn and the many 197a plans developed by Community Boards, even though many were ultimately not adopted by City Planning.

CONCLUSION

We have briefly outlined the problems we have with the Zoning Amendment and hope to be able to support it with the changes we have presented.

Thank you for the opportunity to present this testimony.

Glen Cutrona, AIA, President-Elect, Brooklyn Chapter

Ida Galea AIA, President, Brooklyn Chapter

Jeffrey Geary AIA, President, Staten Island Chapter

Jane McGroarty AIA, Urban Design Committee Chair, Brooklyn Chapter

James Oliva AIA, President Elect, Staten Island Chapter

Willy Zambrano AIA, President, Queens Chapter

TESTIMONY
JOHN P. KAITERIS, CEO, HANAC, Inc.
ZONING FOR QUALITY AND AFFORDABILITY
CITY PLANNING COMMISSION, NEW YORK, NY
DECEMBER 16, 2015

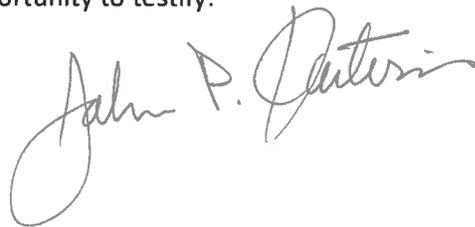
I am John Kaiteris the Executive Director of HANAC, Inc. a non-profit social service provider and affordable senior housing developer. HANAC has been providing senior services since 1973. In delivering services to the elderly we came to realize that we could not stabilize their lives and end the persistent stress they lived with living in housing that did not meet their needs with the constant threat of rising rents and loss of the roof over their heads. With the development of our first senior housing in 1993 we experienced directly the overwhelming pent up need for affordable senior housing. Thousands applied for the 100 units of housing and now after developing 350 units of senior housing our wait list has grown to over 12,000 with a wait time of 7 to 10 months for an apartment. The demographics speak for themselves. The aging tsunami is upon us with the elderly in New York City expected to grow by 47% by 2030. One out of 5 older New Yorkers live in poverty with incomes below \$11,000 and thousands more struggle financially to cover essentials making daily choices between paying rents, utilities, food and medical expenses. The rent one can pay on such a low income is at best several hundred dollars a month and New York City no longer has such low rent housing. This is a rapidly growing population that is now beginning to show up in greater numbers in the ranks of the City's homeless shelters and now exceeds 2,000.

When we started developing housing in 1989, City owned land was plentiful and available for development of senior housing. Now there is little City land available and the competition from market rate development for non-City sites have driven up land prices to astronomical levels. There is an absolute need to rethink how development will be accomplished in the City and how the need for affordable housing will be addressed. The old approaches no longer work.

Over the past 2 years HANAC has worked on the development of an affordable senior housing project on a City owned site in Corona, Queens. To create a feasible project of 68 units, the ULURP application required 3 mayoral overrides (1. For accessory parking; 2. For Dwelling Unit Factor; 3. Open Space Ratio). These procedural steps require an inordinate amount of staff time and expense while delaying in the development of urgently needed housing.

It is with this experience that we welcome and fully support the proposed zoning amendments, in particular the Zoning for Quality and Affordability that will allow for creative ways to facilitate the development of affordable senior housing. The amendments face head on the zoning constraints that prevent maximizing development without doing harm to the contextual nature of the community. The reduction of parking requirements and the relaxation of minimum unit size where appropriate and needed and the easing of other zoning constraints that impede development will make the development process easier, more rational and in the end more productive all with a sensitivity and receptivity to local needs, preferences and concerns. It should be noted that LiveOn NY's study, "Paving the Way for new Senior Housing" identified Section 202 senior housing sites with under-utilized parking lots that could realize as many as 2,000 units of additional senior housing under ZQA amendments. The ZQA amendments reflect an openness to increasing amenity spaces and for open dialogue in the development process. HANAC supports the amendments and will work with the City to see that they are implemented for the benefit of New York's seniors.

Thank for the opportunity to testify.

A handwritten signature in black ink, reading "John P. Denton". The signature is written in a cursive style with a large, looping initial "J".

TESTIMONY
JOHN P. KAITERIS, CEO, HANAC, Inc.
ZONING FOR QUALITY AND AFFORDABILITY
CITY PLANNING COMMISSION, NEW YORK, NY
DECEMBER 16, 2015

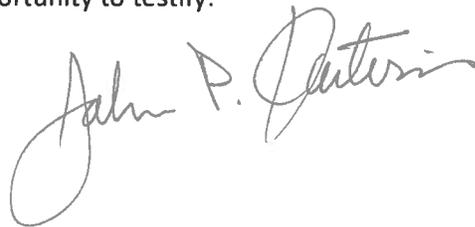
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It is with this experience that we welcome and fully support the proposed zoning amendments, in particular the Zoning for Quality and Affordability that will allow for creative ways to facilitate the development of affordable senior housing. The amendments face head on the zoning constraints that prevent maximizing development without doing harm to the contextual nature of the community. The reduction of parking requirements and the relaxation of minimum unit size where appropriate and needed and the easing of other zoning constraints that impede development will make the development process easier, more rational and in the end more productive all with a sensitivity and receptivity to local needs, preferences and concerns. It should be noted that LiveOn NY's study, "Paving the Way for new Senior Housing" identified Section 202 senior housing sites with under-utilized parking lots that could realize as many as 2,000 units of additional senior housing under ZQA amendments. The ZQA amendments reflect an openness to increasing amenity spaces and for open dialogue in the development process. HANAC supports the amendments and will work with the City to see that they are implemented for the benefit of New York's seniors.

Thank for the opportunity to testify.

A handwritten signature in black ink, reading "John P. Denton". The signature is written in a cursive style with a large, looping initial "J".

TESTIMONY
JOHN C. NAPOLITANO, DIRECTOR OF COMMUNITY DEVELOPMENT, HANAC, Inc.
ZONING FOR QUALITY AND AFFORDABILITY
CITY PLANNING COMMISSION, NEW YORK, NY
DECEMBER 16, 2015

Affordable Housing saves lives! Affordable Housing is also a stepping stone for a better life!

My name is John Napolitano, the Director of Community Development of HANAC, Inc. a non-profit social service provider and affordable senior housing developer. HANAC has been providing senior services since 1973. In delivering services to the elderly we came to realize that we could not stabilize their lives if we did not take action to meet their housing needs given the constant threat of rising rents and loss of the roof over their heads. Just last week we took the step to house a 65-year old army veteran, by the name of Thomas, who had been street homeless for the last 21-years and retreated to the mausoleums of St Michael's Cemetery in Queens to protect himself from the elements during harsh winter months. Had we not intervened with this housing opportunity, Thomas was convinced that he would have died on the streets.

With the development of our most recent housing project in 2012, the HANAC-PCA Senior Residence, we experienced firsthand the overwhelming pent up need for affordable senior housing in our community. Over 2,600 paper applications were received for 66 available units. In covering the building's grand opening, The New York Daily News reported in their story that a person had a better chance of getting into Harvard University than they did getting an apartment in this new building. For the 350 units of senior housing that make up the HANAC housing portfolio, our wait list has grown to over 12,000 with a wait time of 5 to 7 years for an apartment.

Over the past 2 years HANAC has worked on the pre-development of a new affordable senior housing project on a city owned site. To create a feasible project of 68 units, the ULURP application required 3 mayoral overrides. (1. For Accessory Parking; 2. For Dwelling Unit Factor; 3. Open Space Ratio). These procedural hoops require an inordinate amount of staff time and expense while delaying the development of urgently needed housing.

On behalf of HANAC, I applaud the city's efforts related to its proposed zoning amendment. Through our 20-years of experience sponsoring the creation and preservation of new affordable housing for

seniors, we fully support the Zoning for Quality and Affordability amendment to facilitate the development of new senior housing. Under the proposed zoning amendment, developers/sponsors similar to HANAC would be better able to include new amenity spaces such as senior social care centers on the ground floor of its new projects due to changes in maximum height limits. It would also preclude the necessity to finance and maintain expensive parking facilities within these new housing developments that cost on average \$50,000 a parking space. It should be noted that LiveOn NY's study, *"Paving the Way for new Senior Housing"* identified Section 202 senior housing sites with under-utilized parking lots that could realize as many as 2,000 units of additional senior housing if the ZQA amendment were adopted in its current form. The plan before us, I believe will not diminish the livability of our communities. On the contrary, it will increase both amenity and neighborhood equity through added affordability in an effort to make our city a more livable place to thrive for all New Yorkers.

Thank for the opportunity to testify.

A handwritten signature in black ink, appearing to read "Jan Napoli". The signature is fluid and cursive, with a large loop at the beginning and a long horizontal stroke at the end.



**TESTIMONY OF ADRIEN A. WEIBGEN BEFORE THE
CITY PLANNING COMMISSION REGARDING MANDATORY INCLUSIONARY HOUSING**

Thank you, Members of the Commission, for the opportunity to testify today. My name is Adrien Weibgen, and I am a Staff Attorney at the Community Development Project of the Urban Justice Center, or "CDP." CDP's mission is to strengthen the impact of grassroots organizations in New York City's low-income and other excluded communities. We partner with community organizations to win legal cases, publish community-driven research reports, assist with the formation of new organizations and cooperatives, and provide technical and transactional assistance in support of their work towards social justice. As part of its work around neighborhood change, CDP works with its partners to advance policies that promote responsible, equitable development throughout the city.

CDP supports the City's efforts to adopt a new Mandatory Inclusionary Housing policy to require developers to build permanently affordable housing as part of new construction in rezoned communities and on sites where a developer seeks added density. CDP has long advocated for a Mandatory Inclusionary Housing policy in New York City, and we feel strongly that developers who receive additional building rights must be required to set aside permanently affordable housing in exchange.

However, CDP has three significant concerns about the current draft of the policy and the way it interacts with the City's rezoning plans. First, the City's plan to adopt MIH while upzoning only low-income communities of color creates a huge risk of displacement. Though the City may view these issues as separate, they are deeply intertwined, and the City must adopt new strategies to combat the displacement that new development is likely to trigger. Second, for MIH to create more opportunities for low-income people, the City must commit to upzoning wealthy, high-opportunity neighborhoods, not only poor and working-class communities. Third, the City should create additional MIH options that will guarantee that a significant share of new affordable housing is accessible to New Yorkers with incomes below 30% AMI. The income levels of the current MIH options skew far too high, and far beyond the income levels of the communities currently slated for rezonings.

Prevent Displacement

MIH can produce affordable housing only if developers build, and to produce significant amounts of affordable housing with MIH, the City plans to upzone up to 15 neighborhoods. But dramatically upzoning low-income communities creates a huge risk of displacement, because allowing far more building and bringing new resources to communities is likely to make these areas more attractive to wealthier residents, changing the housing market in a way that places low-income tenants at risk. Residents of communities like the South Bronx and East New York are not opposed to development per se, but they are rightly concerned that they will not be around to benefit from the changes that are coming. As rents in the community rise, landlords of rent-regulated buildings will have a huge incentive to harass and displace long-time, low-income tenants in an effort to move these apartments out of stabilization. Tenants of unregulated units can disappear even more easily if landlords double or triple their rents overnight.

TESTIMONY
CITY PLANNING COMMISSION HEARING
DECEMBER 16, 2015
ZONING FOR QUALITY AND AFFORDABILITY (ZQA)
MANDATORY INCLUSIONARY HOUSING (MIH)

The Real Estate Board of New York (REBNY) is a trade association with 17,000 owners, brokers, managers, lenders and other real estate professionals active in New York.

REBNY strongly supports the Mayor's Five Borough, Ten Year Housing Plan to preserve and create more than 200,000 units of affordable housing. More specifically we support the two zoning actions which are important components of that plan: Zoning for Quality and Affordability (ZQA) and Mandatory Inclusionary Housing (MIH).

ZQA provides a number of changes that would improve the quality of housing and modestly increase the quantity of affordable housing.

Our Zoning Committee—comprised of architects, planners, land use attorneys, and builders—welcomed the changes that encouraged better ground floor retail, residential units with adequate ceiling heights, façade articulation, courtyards and reductions in parking.

They acknowledge that these changes would provide more architecturally interesting buildings, would improve the pedestrian experience on the street, would devote more scarce resources to housing and not parking which can add significantly to project costs, would improve street level retail and overwhelmingly agree with the Department's that these changes would not produce dramatic changes in development or character of the neighborhood.

Our committee welcomed the additional limited height proposed for medium and high density zoning districts as a prudent way to encourage the creation of on-site affordable housing. The additional height—one or two stories—would provide

flexibility to use on-site the additional floor area generated by inclusionary housing without compromising on the quality of the apartments within the building.

However, the inability to build the inclusionary housing off-site and utilize the floor area bonus generated and the additional height proposed in ZQA on a contextual site in the same community board has limited the opportunity to create more affordable housing.

Our housing and affordable housing problem is in part a result of too restrictive land use regulations, including absolute height limits and use and bulk and parking regulations which are outdated.

We commend the administration's effort in ZQA to have the city's land use policy address our most urgent housing needs.

MIH zoning text amendment is a paradigm shift in city land use policy. As such we should proceed cautiously, recognizing it is easier to make the rules more restrictive than less, as the height limit issue in ZQA demonstrates.

The scope and depth of the market and financial analysis that was done to support MIH is comprehensive and detailed and concludes that such a program can support housing production and promote neighborhood economic diversity for a range of building types and in a range of conditions without having a chilling effect on new production. Our preliminary review concurs with this general conclusion.

The foundational aspects of the market and financial analysis are land use actions to promote increased housing and the availability of public subsidies, particularly 421a and the Low Income Housing Tax Credit.

The threshold question for us with MIH is whether the program makes economic sense as applied both to City initiated rezonings and private applications.

Mapping MIH in City initiated rezonings, such as East New York, are generally in areas that has seen very little, if any, new private sector residential development and the bulk increases are quite substantial compared to the existing base FARs.

Nevertheless, in some areas, despite the increased bulk and the availability of tax exemption benefits, new residential development is not generally feasible without public subsidy.

In short, the program with increased bulk, tax exemption benefits and subsidy appears to be structured in a way that makes economic sense and could actually encourage, not thwart, new housing production.

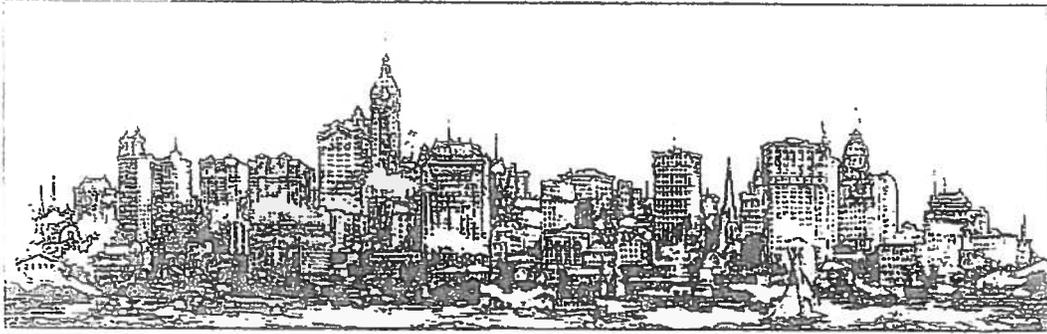
However, there is concern with how the program would be applied to and impact private applications which are in potentially more marketable locations and which would lead to more new housing construction. Here are some of our concerns:

- Mandating a single option. As with the new 421a program, Mandatory Inclusionary Housing should permit builders choices that work best for the location and current market conditions. These choices can be developed in conjunction with the Commission and the Council, but having choices is critical in these situations.
- Compared to City rezonings, these private applications would not have the bulk increases contained in the City action and may not be sufficient to offset the economic cost of a single mandatory inclusionary housing option as determined through the public review process.
- There is concern that in some neighborhoods market conditions would support a private rezoning application, even if it does not have any increase in bulk comparable to a City rezoning. However in analyzing the two primary choices, the slight increase in rent for 30 percent of the affordable units cannot be offset by the lost revenue from the lower percentage (70 percent) of market rate units. Mandating this as the only option in this situation would thwart the rezoning.
- More generally, there is concern that the 30 percent mandatory inclusionary housing option, at an average of 80 percent AMI, so significantly diminishes the value of the 30 percent tax exemption benefit that it makes this option problematic.
- Likewise, there is concern that the public subsidy available to address a financial gap in new housing production in City rezoned areas would not be

forth coming for areas rezoned through private applications because of their perceived marketability.

- Similarly, in addition to the availability of public subsidy to make projects economically feasible, the program proposes hardship relief at the BSA as another way to mitigate the impact of the mandatory requirement. This could be a more likely approach in these more marketable areas. However, owners are concerned that as the applicant of a rezoning they may not be approved for such relief since the hardship would be seen as self-imposed by the rezoning they initiated. A related BSA concern is what is needed to demonstrate hardship.
- There is concern about the fixed mandatory affordable housing requirement when a private application advances other planning objectives, such as landmark preservation, theater and other cultural uses, and transportation improvements.
- Another practical concern is that there are times when DCP asks a private applicant to include adjacent properties under other ownership as part of their action. How would this additional cost and responsibility be factored in to the affordable requirement?
- There is concern that the threshold for projects to satisfy their mandatory inclusionary requirement is too low and should be raised to 50 units or 50,000 square feet.

We welcome this opportunity to support the Administration's bold and ambitious housing plan; we encourage the Commission to hold firm on the limited height increases in ZQA as a modest and meaningful way to encourage more housing production, and we urge the Commission to ensure that in this mapping action and all private applications subject to MIH allow the builder to retain the ability to select from a menu of options to satisfy the mandatory inclusionary housing requirement.



THE SOCIETY FOR THE ARCHITECTURE OF THE CITY
ZQA and MIH text amendments and their environmental review
Before the City Planning Commission, December 16, 2015

As we understand it, this hearing serves both as part of the ULURP review of ZQA and MIH, and as an opportunity to comment on the ZQA DEIS. Although ZQA and MIH are before us in tandem for ULURP, only ZQA is in process of receiving environmental review, because the CPC, author of the amendments, is also the lead agency for their environmental review. The CPC has issued a negative declaration for MIH, exempting it from further environmental scrutiny on the grounds that MIH will have no effect on the environment until it is mapped or implemented by subsequent discretionary decisions of the City Planning Commission. We do not understand how this responds to the decision in *Fisher v. Giuliani* where the court found that

The DCP was of the view that no environmental review of these amendments was required because when an owner applied for a special permit, an assessment would be made at that time. Hence, the DCP believed that it could defer its analysis. This was an error. It is well settled that "SEQRA's goal [is] to incorporate environmental considerations into the decision making process at the earliest opportunity". (280 A.D.2d 13 (2001), 720 N.Y.S.2d 50)

Although theoretically the purpose of environmental review is to provide information to decision makers, a peculiarity of New York's rules (cited in *CEQR Manual*, Section 280) allows the ULURP to be initiated before environmental review on a zoning text amendment is complete, so that decisions issued during the ULURP process are made without the benefit of a completed EIS. However, the draft EIS found that ZQA would cause significant negative impacts on historic resources that could not be mitigated. That is correct. The changes to height, bulk and massing requirements encourage alteration and demolition of existing buildings whether or not they are historic, and historic buildings that are listed on the State and National Registers will have no protection against such alterations, while city landmarked districts will experience significant pressures to conform.

We find that these amendments are also deficient in terms of their stated purpose. At least, this initiative has finally brought home to thousands of New Yorkers that the federal Area Median Income (AMI) is a very deficient measuring tool for this city, as it averages in some of the wealthiest zip codes in the United States as well as many of Westchester's most opulent suburbs when determining what is "affordable" to the low income workforce here. If there had been environmental review, alternatives would have been considered, but as it is, incentivizing real estate investment is wrongly presented as the only solution to the housing problem.

Christabel Gough

Submitted by Christabel Gough, Secretary (christabelgough@gmail.com 646-509-4944)



**TRANSPORTATION
ALTERNATIVES**

**OFFICE OF THE
CHAIRPERSON**

December 11, 2015

DEC 15 2015

29129

To: City Council Speaker Melissa Mark-Viverito
Carl Weisbrod, Chairman of the City Planning Commission
Members of the City Planning Commission

We support the removal of mandatory parking requirements for new affordable housing near transit in the Zoning for Quality and Affordability proposal. These requirements, which are completely arbitrary and not in any way mandated by actual need or scientific analysis, needlessly inflate the cost of housing. This makes it more difficult to build much-needed housing units and interferes with the goal of helping lower- and middle-income New Yorkers stay in the city.

Parking requirements are not helping the cause of affordable housing - in fact, evidence shows they work against it. In New York City, parking in above-ground garages costs more than \$21,000 per space to build. Below-ground parking can run up to \$50,000 per spot. Requiring off-street parking in new developments thus pushes up the cost of creating housing, which makes affordable housing a less appealing prospect for builders and stands in the way of actually constructing it. A city-commissioned study by the NYU Furman Center concluded, "The largest and most difficult zoning constraint affecting the development of new housing has been the requirement of building on-site parking spaces." A 2012 study, also by Furman, looked at 317 recently-built housing developments subject to parking requirements, and found that 77% had either the exact minimum or close to the minimum number of required parking spaces. While lower-income households are less likely to own cars, parking minimums will require them to pick up the cost.

Furthermore, the parking spaces mandated by these requirements do not correspond to New Yorkers' existing mobility habits. According to the Census, New York City is the only locality in the country where more than half of households do not own a car, and we have the highest use of public transportation. In this context, to have housing developments held hostage to parking requirements that residents may not need or want does not make sense. Zoning for Quality and Affordability's reduction of mandated parking is focused on affordable housing in the most transit-accessible areas. These areas, located within one half mile of a subway, already have low car ownership rates and a mix of public transit options, and access to neighborhoods shops and services. We should be encouraging transit-oriented development in order to build a more sustainable city.

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Off-street parking space requirements result in unnecessary costs that would be passed along to users who don't need them, don't really want them, might not even use them, and who may not be able to afford to pay for them. And New York City can't afford them at a time when simply having a roof over one's head is increasingly out of reach for thousands of people.

Paul Steely White

Executive Director

TRANSPORTATION ALTERNATIVES

Gene Russianoff

Senior Attorney

NYPIRG STRAPHANGERS CAMPAIGN

Thomas K. Wright

President

REGIONAL PLAN ASSOCIATION

Veronica Vanterpool

Executive Director

TRI-STATE TRANSPORTATION CAMPAIGN

Elena Conte

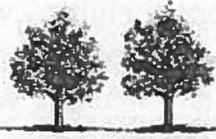
Director of Policy

PRATT CENTER FOR COMMUNITY DEVELOPMENT

Eric McClure

Executive Director

STREETSPAC



TWO TREES
Management Co. LLC

TESTIMONY
CITY PLANNING COMMISSION HEARING
DECEMBER 16, 2015
ZONING FOR QUALITY AND AFFORDABILITY (ZQA)
MANDATORY INCLUSIONARY HOUSING (MIH)

As one of the biggest developers of mixed income housing in Brooklyn and a supporter of keeping the City affordable to low and moderate income families, Two Trees Management strongly supports the Mayor's Ten Year Housing Plan to preserve and create more than 200,000 units of affordable housing. In addition, we strongly support the two zoning actions which are important components of that plan: Zoning for Quality and Affordability (ZQA) and Mandatory Inclusionary Housing (MIH).

Simply put, one of the easiest ways to create additional affordable housing is to make it cheaper and easier to build. Two Trees often evaluates potential sites for future mixed income development and are intimately familiar with the costs that often inhibit projects from being financeable and moving forward. The administration, the Department of City Planning and the Department of Housing and Preservation should be applauded for its ambitious undertaking to lower the costs of affordable housing construction and thus maximize the potential of the private sector to build rental and affordable housing.

Specifically, we welcome the changes that encourage better ground floor retail, residential units with adequate ceiling heights, and better design in the form of façade articulation and courtyards. On several projects that Two Trees has developed, we have faced challenges accommodating the additional density generated by the voluntary inclusionary housing program. We support the additional limited height proposed for medium and high density zoning districts as a smart way to encourage the creation of on-site

affordable housing. This additional height— while modest and virtually invisible to pedestrians — provides flexibility to use on-site the additional floor area generated by inclusionary housing without compromising on the quality of the apartments within the building.

With regard to onsite parking requirements, Two Trees has repeatedly found that the requirements far outstrip actual demand for these spaces. Usage patterns are changing and more of our residential (and commercial) tenants now rely on mass transit or bicycle than ever before. Creating underutilized parking at the ground floor and above grade is bad planning that results in desolate street conditions and squeezes out retailers. Requiring developers to build parking below grade, and perform expensive and highly regulated dewatering projects, astronomically increases construction costs and prevents some projects from being undertaken altogether.

With respect to MIH, Two Trees has repeatedly elected to voluntarily build affordable housing as part of our projects because the various programs and incentives have made it economical to do so. Nevertheless, we believe that a mandatory program can support housing production and promote neighborhood economic diversity for a range of building types and in a range of conditions without having a chilling effect on new production. The success of MIH, however, will be closely linked to the continued existence of the 421-a program. We encourage the City and the appropriate agencies to undergo contingency planning in the event that 421-a is not adopted in early 2016 and is discontinued.

Dave Lombino



**TESTIMONY OF ADRIEN A. WEIBGEN BEFORE THE
CITY PLANNING COMMISSION REGARDING MANDATORY INCLUSIONARY HOUSING**

Thank you, Members of the Commission, for the opportunity to testify today. My name is Adrien Weibgen, and I am a Staff Attorney at the Community Development Project of the Urban Justice Center, or "CDP." CDP's mission is to strengthen the impact of grassroots organizations in New York City's low-income and other excluded communities. We partner with community organizations to win legal cases, publish community-driven research reports, assist with the formation of new organizations and cooperatives, and provide technical and transactional assistance in support of their work towards social justice. As part of its work around neighborhood change, CDP works with its partners to advance policies that promote responsible, equitable development throughout the city.

CDP supports the City's efforts to adopt a new Mandatory Inclusionary Housing policy to require developers to build permanently affordable housing as part of new construction in rezoned communities and on sites where a developer seeks added density. CDP has long advocated for a Mandatory Inclusionary Housing policy in New York City, and we feel strongly that developers who receive additional building rights must be required to set aside permanently affordable housing in exchange.

However, CDP has three significant concerns about the current draft of the policy and the way it interacts with the City's rezoning plans. First, the City's plan to adopt MIH while upzoning only low-income communities of color creates a huge risk of displacement. Though the City may view these issues as separate, they are deeply intertwined, and the City must adopt new strategies to combat the displacement that new development is likely to trigger. Second, for MIH to create more opportunities for low-income people, the City must commit to upzoning wealthy, high-opportunity neighborhoods, not only poor and working-class communities. Third, the City should create additional MIH options that will guarantee that a significant share of new affordable housing is accessible to New Yorkers with incomes below 30% AMI. The income levels of the current MIH options skew far too high, and far beyond the income levels of the communities currently slated for rezonings.

Prevent Displacement

MIH can produce affordable housing only if developers build, and to produce significant amounts of affordable housing with MIH, the City plans to upzone up to 15 neighborhoods. But dramatically upzoning low-income communities creates a huge risk of displacement, because allowing far more building and bringing new resources to communities is likely to make these areas more attractive to wealthier residents, changing the housing market in a way that places low-income tenants at risk. Residents of communities like the South Bronx and East New York are not opposed to development per se, but they are rightly concerned that they will not be around to benefit from the changes that are coming. As rents in the community rise, landlords of rent-regulated buildings will have a huge incentive to harass and displace long-time, low-income tenants in an effort to move these apartments out of stabilization. Tenants of unregulated units can disappear even more easily if landlords double or triple their rents overnight.

MIH is only part of this puzzle, but the City should not act as though MIH and upzonings exist in a vacuum when MIH fundamentally depends on creating added density – density that will increase the risk of displacement in many communities. The City must adopt strategies to combat the displacement of both rent-regulated and unregulated tenants, including citywide zoning text or legislation that mirrors the protections in place in the Special Clinton District. Landlords who harass their rent-regulated tenants should not be able to access the permits they need to renovate or expand their buildings *unless* they agree to set aside part of their buildings as permanently affordable housing. Although the City’s investment in anti-displacement legal services is meaningful and important, these services will never be enough if the payout for harassing out tenants remains so high. The City should adopt an anti-harassment policy to break the cycle of harassment and displacement and assure longtime tenants that neighborhood change will not come at their expense. The City must also think creatively about strategies to combat displacement of tenants in unregulated units, who are incredibly vulnerable to displacement from communities like East New York. Though it is more difficult to protect the rights of tenants whose rents can escalate at any time, tax breaks for private landlords who agree to keep their rents low and higher taxes for investor-purchased properties could help stem the tide of displacement. Whatever the solutions, the City cannot simply ignore this problem and hope that the public forgets about it.

MIH will only succeed at increasing housing opportunities for low-income people if the City develops meaningful strategies to prevent displacement. We urge the Commission to make anti-displacement strategies part of the conversation around MIH – not an afterthought.

Upzone Wealthy Communities

CDP also urges the City to commit to rezoning wealthy communities as part of its overall rollout of MIH and the rezonings. The City’s MIH policy study provides significant evidence of the benefits of programs that permit low-income people to access housing in wealthier, better-resourced areas. According to the City’s research, programs like these can increase adult employment rates, improve high school graduation rates, improve mental and physical health, and increase academic performance.¹ These findings are important and valuable, and they underscore the importance of creating affordable housing for low-income families in high-opportunity neighborhoods in the City. But so far, the City has named only low-income communities as target areas for rezonings – areas where the risk of displacement is greatest, opportunities are fewest, and the amount of subsidy required to make *any* development feasible is at its peak.

We urge the City to follow through on its own findings and commit to rezoning wealthier neighborhoods, including many of those in Manhattan and the inner-ring neighborhoods of Brooklyn and Queens, to ensure that MIH creates more opportunities for low-income families in well-

¹ The programs cited by the City include “the nation’s first mobility experiment ... the court-ordered relocation of Chicago Public Housing Authority residents from racially segregated, high poverty neighborhoods to communities with a higher degree of racial and economic integration,” a program found to increase adult employment rates and improve high school graduation rates; the HUD-sponsored Moving to Opportunity program, which “found that among households that moved to neighborhoods with lower poverty rates, adults had both physical and mental health improvements” and young girls had significant improvements in health and other outcomes, even years later; and a 2010 study of “the academic performance of students living in publicly-owned inclusionary housing units in Montgomery County, Maryland - one of the wealthiest counties in the nation and home to the country’s largest and oldest inclusionary housing program,” which found that students who attended the most advantaged schools far outperformed those who attended the least advantaged schools. *New York City Mandatory Inclusionary Housing: Promoting Economically Diverse Neighborhoods*, Dep’t of City Planning, City of New York (Sept. 2015), p.48-49.

resourced areas. The City's current choice to rezone only poor and working-class communities is indefensible, especially since the City's own economic studies show that developments in strong markets – unlike those in cooler markets – can sustain significant amounts of deeply affordable housing and remain financially viable without government subsidies. Because developers in wealthy areas can collect so much income from market-rate apartments, they can sustain more affordable units under MIH – and they should be pushed to do so. To get more bang for its buck, create a greater number of affordable units, and reap the full benefits of MIH, the City must rezone rich areas as well.

Create Deeply Affordable Options

Finally, we urge the City to create a deep affordability option within MIH, and to ensure that every MIH option requires a significant share of units accessible at very low income levels. Currently, none of the MIH options require housing at affordability levels below 60% AMI, even though 85% of New Yorkers making under 50% of AMI are rent-burdened, and there are “14 times more rent-burdened households at 50% AMI and under, than at 100% AMI and up.”² New York City's housing crisis is greatest for those below 50% AMI, but the City failed to even study MIH options with affordability levels below 60% AMI.

The income levels of affordable housing should meet the needs of the people in greatest need, and this must be written into the MIH policy. Even though HPD subsidies will be needed to spur construction in some neighborhoods and will help to make rents more affordable than the MIH text requires, these subsidies will not last forever and will not provide permanent affordability. Subsidies are also voluntary, and landlords are less likely to take them as neighborhoods change and market rents increase. Having lower income levels written into the zoning text is the only way to guarantee that these apartments *always* remain deeply affordable. Specifically, CDP joins the Association for Neighborhood & Housing Development in calling for an MIH option that requires 30% of units to be affordable at 30% AMI, and a set aside of 15% of units at the 30% AMI level for all MIH options.

We also urge the City to study the viability of creating an additional MIH option that would require a higher share of units at this 30% AMI level, as research suggests that “strong” and “very strong” markets may be able to support developments where almost half of all units are affordable at these levels.³ Creating this strong market option would maximize the benefits of MIH, dramatically increasing the share of apartments accessible to the New Yorkers who need them most.

² “ANHD Analysis of NYC Inclusionary Zoning Proposal,” ASS'N FOR NEIGHBORHOOD & HOUSING DEVELOPERS (July 31, 2015), <http://www.anhd.org/?p=7038>.

³ “Mandatory Inclusionary Housing: Financial Feasibility and the Current City Proposal,” ASS'N FOR NEIGHBORHOOD & HOUSING DEVELOPERS (Nov. 2015), http://www.anhd.org/wp-content/uploads/2015/11/MIH-White-Paper-11-12-2015.pdf?utm_source=Blog-MIH+position-12-8-15&utm_campaign=Blog-MIH+position-12-8-15&utm_medium=email.

TESTIMONY PREPARED FOR THE DECEMBER 16, 2015 PUBLIC HEARING OF THE CITY PLANNING COMMISSION REGARDING ZONING FOR QUALITY AND AFFORDABILITY (N 160049 ZRY) AND MANDATORY INCLUSIONARY HOUSING (N 160051 ZRY)

By Barry Weinberg, Member, Manhattan Community Board 9 Housing, Zoning, and Land Use Committee; barry.j.weinberg@gmail.com

Good morning Chairman Weisbrod and members of the City Planning Commission.

My name is Barry Weinberg, and I am a resident of Hamilton Heights and a member of Manhattan Community Board 9's Housing, Zoning, and Land Use Committee.

I speak only for myself today, but many of my points are taken from Community Board 9's resolution to disapprove the ZQA and MIH proposals. I helped draft that resolution, and I would urge to Commission to read that resolution and the resolutions from community boards across the city that contain reasonable and important suggestions and feedback on how to improve these two proposals. These recommended changes should be made to the zoning text proposal before it is submitted to the City Council.

It is safe to say that almost all of us living in this city, including those serving on community boards, support the goals of permanent affordable housing; affordable, flexible, and functional senior living facilities; and varied, nuanced, and appropriate zoning guidelines to provide for buildings that enliven pedestrian experiences while meeting the commercial and residential needs of our city. Why, then, has there been so much opposition from the public and the community boards on the MIH and ZQA proposals?

The problem lies not in the proposals' aims, but in their details. Generally speaking, the MIH proposal does not do enough to ensure that housing is created for New Yorkers earning 50% or less of federal area median income, an income that includes Westchester and Rockland Counties in its calculations. The ZQA proposal, on the other hand, while including many positive changes to the zoning code, unacceptably pares back hard-won and important regulations on out of context development on regarding things like narrow lots, rear yard setbacks, and height limitations in contextual districts.

I will speak from my experience representing my own community of West Harlem. According to data from the 2012 American Community Survey, 25.5% of households in Community District 9 in Manhattan have combined income and benefits received of \$15,000 per year, and 46.6% have combined income and benefits of \$35,000 per year. In order for housing to be truly affordable for the majority of households in Community District 9, a band closer to 40% of Area Median Income (approximately \$31,080 for a family of three) would have to be included for units to be truly affordable. Developers, if given the choice to develop units over a range of incomes averaging to 60% AMI or instead a uniform set of units for incomes at 60% of AMI, they will likely choose the latter. Similarly, they will likely choose to develop at 80% of AMI over 60%, given the option. The MIH proposal must be modified to include provisions requiring more units be created for low-income working New Yorkers.

Additionally, while I support provisions to encourage development of affordable senior housing, any permanent FAR bonuses or additional height should only be available for senior housing that is *permanently* affordable, not for housing that is only affordable for an initial period. Any additional FAR and height allowed will be permanent, so why should affordability be temporary? It does not make sense for these units to have a provision that allow them to return to market rates after an initial period of 30 years.

Regarding ZQA, many troublesome provisions should be excised. One example is the provision eliminating rear yard setbacks in R6, R7, R8, R9, and R10 zoned in Section 23-663, formerly required in paragraph (a). These setbacks are important for properties on abutting lots which have rear yards. These yards would face the possibility of suddenly having multi-story building walls built at the lot line, blocking light and air. As a Community Board member, I know that the moment a wall abutting someone's rear yard is built at the lot line, we will be faced with irate residents, to whom we will be unable to offer any recourse, as the development will be as of right. It makes no sense to remove this regulation, when the negative consequences of doing so are so very clear, simply so that it is easier for buildings to be set back further from the street line.

Worryingly, a provision exempting R8 areas above 125th street in my own Manhattan Community District 9 from Quality Housing requirements if the development is pursuant to the Inclusionary Housing Program or contains affordable senior housing in Section 23-674 was not brought to our attention when the Department of City Planning presented its proposal to the Community Board. This covert "rezoning," or at least a rewriting of the rules that CB9 attempted to put in place when it undertook its long and thoughtful West Harlem rezoning process, unacceptably undoes all of the hard work that went into planning for the future and sustainability of development in our community. 23-674 should be removed before the text is submitted to the City Council

Perhaps most troublingly in ZQA is the totally unnecessary provision exempting Quality Housing buildings built pursuant to the Inclusionary Housing Program or affordable senior housing buildings from the so-called "sliver rules" in Section 23-692 paragraph (d), sub-section 7. These rules are vital to ensuring that mid-block development on narrow side-streets is contextual, and that tall, slender mini-towers are not built in the midst of otherwise lower blocks. I urge that this addition be removed before the text is submitted to the City Council.

These are but a few of the troubling changes I, as a layperson with minimal to no training in reading and understanding zoning codes, found in the ZQA proposal, which, as I stated in the beginning, also contains many desirable changes to allow for building envelop articulation and desirable architectural features like courtyard entrances and bay windows. I believe that many of the flaws in both the ZQA and MIH proposals have come as a result of a rushed process, and I urge that what little time that is provided for public input be taken seriously by the City, and that the input be reflected in the final submission to the City Council.

Thank you.



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vicsocny.org

Testimony at City Planning Commission Hearing On “Zoning for Quality and Affordability” Proposal

The Victorian Society in America was founded in 1966 upon the advice of Sir Nicholas Pevsner to several New Yorkers attending England’s Addingham Summer School. He cautioned that the U.S. was in danger of losing its remnants of 19th-century architecture. Victorian Society New York, the founding chapter of the national organization, works to preserve the architecture of the 19th and early 20th centuries in the entire city.

The proposed Zoning for Quality and Affordability would endanger many of the structures we strive to protect. It would encourage destruction of older structures that show residents and tourists the aesthetic evolution of our streetscapes and neighborhoods. Perhaps more importantly, such destruction would wipe away established affordable housing units. The effect, therefore, would be counterproductive.

New York City has developed and evolved over four centuries. Zoning legislation was first enacted in 1916 in large measure to protect light and air. Contextual zoning came into being about 1990 to assure that new construction was sympathetic to earlier buildings. The proposed rezoning would permit an important element of contextual zoning to be eliminated by permitting higher structures. Additionally, compromising rear yard requirements could result in slum conditions like those of more than a century ago that led to adoption of the current standards.

The proposal would impact our quality of life by allowing light and air to be blocked and by changing density, making our sidewalks even more crowded. Taller buildings bring added problems. Typically, they require deeper foundations than adjacent smaller buildings, and needed underpinning is risky. Shadows cast by tall buildings affect neighboring buildings, people and trees.

Commissioners, please do not be swayed by arguments that a fix here and a patch there will make this a workable plan. Too much is at stake. The best solution is a no vote.

**Hilda Regier, President
Victorian Society New York**



**WSFSSH
CENTRAL OFFICE**

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www.wsfssh.org

December 16, 2015

Testimony supporting the proposed Zoning for Quality and Affordability which promotes the production of high quality, affordable senior housing

My name is Paul Freitag and I am the Executive Director of The West Side Federation for Senior and Supportive Housing (WSFSSH.) WSFSSH strongly supports the provisions in the Zoning For Quality and Affordability that will help seniors remain in their communities by making it easier to provide affordable senior housing and care facilities. Older New Yorkers are the city's fastest growing demographic and will account for 20% of the population by 2030. Sadly, an estimated one in five older New Yorkers is living in poverty

WSFSSH develops, manages and owns over 1700 units of affordable senior housing in the Bronx and Manhattan that range from independent living apartments to facilities that provide extensive services to allow seniors to age in place. From our position on the front lines, we recognize that the need for affordable senior housing has reached a crisis level. The number of seniors on our waitlists is counted in the thousands, and the wait time for an apartment is counted in years. It is sobering to tell a senior citizen that the wait time for an apartment may be longer than a reasonable estimate for the balance of his or her lifetime.

WSFSSH has firsthand experience with the zoning envelope issues that the Zoning for Quality and Affordability is attempting to address. We believe that the proposed modifications regarding ground floor units, setbacks, unit sizes and especially parking will promote the development of high quality, cost effective affordable senior housing. We particularly appreciate the provision to allow for additional height in order to be able to fit in the allowable floor area. This will directly translate into more affordable senior apartments.

WSFSSH strongly supports the provisions in the Zoning for Quality and Affordability that will create the opportunities for more and higher quality affordable senior apartments. We hope that these provisions can act in combination with regulations that protect the affordability of the units for the long term and incentive production by non-profit developers who are committed to building permanently affordable senior housing.

Paul R. Freitag

Executive Director

WSFSSH

West Side Federation for Senior and Supportive Housing

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Waterbury LaSalle Community & Homeowners Association

**1145 Hobart Avenue
Bronx New York 10461**

**OFFICE OF THE
CHAIRPERSON**

**City Planning Commission
22 Reade Street
New York, New York 10007-1216
Carl Weisbrow**

SEP 29 2015
2 8781

Dear Director Weisbrow

September 25, 2015

The Waterbury LaSalle Community and Homeowners association would like to address the **Mayor's Housing Proposal for zoning for quality and affordability.**

The Mayor's proposal does not offer any **city planning** it just adds housing to the city and changes in place zoning to accomplish this. Housing without proper planning and consideration for the needs of each community is irresponsible and will destroy this city.

Before any new housing is built in any neighborhood infrastructure must first be considered, addressed and improved. Electric, Gas, Water and Sewer service must be up graded to accommodate additional housing. Schools, Library's, Police, and Fire departments must be built or expanded to accommodate additional people. Also, Parks and street traffic must be considered before any new housing is built. Zero lot line building must be addressed and corrected so that a new building could not encroach and or damage an existing older home. Simply put just building housing is a formula for disaster unless the infrastructure is in place to handle additional people first.

The Mayor wants to eliminate what he calls unnecessary parking. There is no such thing as unnecessary parking. We have been fighting for a long time to increase the parking requirements especially in zoning where large multiple family apartment buildings are allowed. The parking requirement must be increased from 50 % to at least 100% or more per apartment building for all housing types and there must be no loophole that would allow a builder to decrease parking. Whether it is for senior housing or affordable housing or any other type of housing, we are constantly fighting for more parking spaces in every neighborhood. A city that ignores the parking problem is a city that does not care about its citizens. The future will only make conditions worse. While it may be true that in some areas car ownership may be less than others, the fact is these people all have visitors who will travel by car and they need a place to park. Additionally, every shopping district in every borough needs more parking today and they will continue to need more parking in the future. Also every train station, school, police and fire station also needs more parking for employees and visitors. Cars are not going away.

We agree this city does need more senior housing and assisted living housing. We also need to allow the senior's to stay in their own neighborhood where they have access to stores they know, people that they are familiar with, doctors that know them and in general a community that they chose to live in. The New York City Housing Authority today will assign a senior applying for an apartment to any apartment in the borough without regard for the applicant's needs or wants and if they refuse two apartments in an unacceptable neighborhood they are taken off the list they have waited on for more than 5 years. This policy must be change. The needs and requirements of our seniors must come first.

Sincerely,

**Andrew Chirico
Waterbury LaSalle Community & Homeowner Association**

Coalition Against the Mayor's Rezoning Plan

October 15, 2015

Carl Weisbrod, Chairman
New York City, City Planning Commission
22 Read Street
New York, New York 10007 (Via email)

OFFICE OF THE
CHAIRPERSON

OCT 20 2015
2 88 56

Re: Zoning for Quality and Affordability (ZQA)

Dear Chairman Weisbrod:

We represent a growing number of concerned civic leaders of the Bronx united in opposition to Mayor de Blasio's proposed Zoning for Quality and Affordability text amendments. While we heartily endorse the objective of increasing affordable housing opportunities in our community and throughout New York City, we believe that the City can achieve its affordable housing goals under the current zoning. Utilizing 421a and other tax incentives, developers can already build taller, denser buildings with fewer required parking spots.

Our concern with the Mayor's plan is that the outer boroughs will bear the brunt of the inevitable onslaught of high-density development and its unintended consequences:

- Loss of open and green space, air, light, views, and neighborhood character
- Increased circling to find fewer parking spaces due to the elimination of onsite parking requirements for new subsidized development in "transit zones," and reduced parking requirements elsewhere.
- Flooding and sewerage backups as aging infrastructure fails to accommodate the building boom
- Overcrowded schools
- Increased bulldozing of private homes and businesses appropriately scaled to their communities, and replacing them with behemoths.
- High density building in parking lots of existing nursing homes (by special permit)

The Mayor's upzoning plan contradicts the goals of communities throughout New York City. ZQA would negate years of careful planning that produced *Community District 8 2000: A River to Reservoir Preservation Strategy*, a 197-a plan adopted by the City Planning Commission and the City Council in 2003. Indeed, pursuant to this official City policy a series of zoning actions to "preserve the scale and character of area neighborhoods" was enacted for North Riverdale, Central Riverdale, Spuyten Duyvil, Van Cortlandt Village and others, plus text amendments for the Special Natural Areas District and expansion of SNAD boundaries.

Furthermore, city-wide zoning amendments under consideration will allow multi-family apartment buildings to be constructed in low density R-1 and R-2 single family residential areas. These multi-family apartment buildings, referred to as CCRCs (Continuing Care Retirement Communities), are, in reality, high-rise apartment houses. If permitted in R-1 and R-2 Residential Zoning districts, they will destroy the character of these low-density districts.

Coalition Against the Mayor's Rezoning Plan

Another issue is the reduced size of affordable units in order to increase profitability. Families and seniors who qualify for affordable housing deserve livable space. Current zoning allows units to be as small as 400 square feet, whereas the proposed text has eliminated that minimum to allow developers to build even smaller micro-units.

We urge you to support the preservation and rehabilitation of the existing housing stock. A good affordable housing plan would increase real code enforcement, finance capital improvement loans for private housing, and infuse major capital funding to restore and repair NYCHA buildings. This proposal, on the contrary, incentivizes the allocation of taxpayer funds to developers under the guise of building affordable housing. Actually, many developers would be building largely expensive market rate units. This will only create a relatively small number of affordable units (20% or 30%) at various income level qualifications. It is a well-established fact that "affordable" housing built in the Bronx is often more expensive than the existing (and better) housing stock it replaces.

The proposed action is an ineffective and expensive policy change that will burden taxpayers with needed infrastructure costs to support the increased housing density.

These are some of the reasons we have urged Community Board 8, Councilmember Andrew Cohen, and Borough President Reuben Diaz to oppose the proposed Zoning for Quality and Affordability plan and take a leadership role to protect the Northwest Bronx, its green and open space, infrastructure, parking, and neighborhood scale.

Please feel free to contact Jennifer Klein at 917- 690-6008 or email riverdalecommunitycoalition@gmail.com.

Sincerely,

Sura Jeselsohn
Along the Hudson Homeowner's Association

Laura Spalter, Damian McShane
Broadway Community Alliance

Stuart Gartner
CPR

Patrick Burke
Fieldstondale Cooperative

Jodie Colón, Tony Thoman
Friends of Spuyten Duyvil

Richard Baldwin, Jennifer Klein, Marty Zelnik
Riverdale Community Coalition

Peter Kohlmann, Robert Lynch, Sherida Paulsen
Riverdale Nature Preservancy

Avi Henoch
Riverdale Safe Streets

Frank Analante, Gary Klingsberg
Riverdale-Spuyten Duyvil Coalition

Josephine Perella
Robin Hill Association

Marty Zelnik
Sigma Place Homeowner's Association

Thomas Owens
Skyview on the Hudson

Deirdre Burke
Vinmont Homeowners Association

CARNEGIE HILL NEIGHBORS

December 28, 2015

Hon. Carl Weisbrod, Chair
New York City Planning Commission
120 Broadway, 31st Floor
New York, NY 10271

Re: Proposed Text Amendments for Zoning for Quality and Affordability

Dear Chair Weisbrod,

Carnegie Hill Neighbors welcomes the opportunity to address the issues raised by the ZQA text amendments.

Our organization's history: We are a volunteer membership organization with a catchment area of about 40 city blocks the Upper East Side between Fifth and Third avenues from 86th to 98th streets. We were formed in 1970 with the dual purpose of opposing the tall buildings being built and planned on and near Madison Avenue at 89th and to pursue the formation of the Carnegie Hill Historic District (first created in 1974, with a major expansion in 1993; two other districts were added later) to encompass the many individual landmarks that the Landmarks Preservation Commission had designated soon after the enactment of the landmarks law in 1965. We also pursued quality of life issue and pioneered the annual planting and maintenance of the Park Avenue malls from 86th to 96th Streets funded by the surrounding apartment buildings, a model soon emulated for the 40 or so blocks to the south. We have also maintained an active interest in zoning – participating in the creation of R8B zoning in the 1980s, the subsequent downzoning of Madison Avenue, and the creation of the Sliver Law among other issues.

Our Opposition to ZQA: Carnegie Hill Neighbors wishes to register its strong opposition to ZQA. We feel its overall thrust is a wholesale upzoning of much of the City, and its approach can largely be characterized as one-size-fits all. At the same time we wish to state that seeking better solutions to increasing affordable housing in general and for seniors in particular are very worthwhile and should be pressing goals. Ideally our wish is that these goals could be pursued in a different manner. Barring that, we would favor a slower more in depth approach to the areas covered. We also feel that the payoff in terms of benefits accruing to affordable housing should be more favorable in terms of the benefits accruing to developers under the proposed provisions. Also, we note that certain provisions of the proposed amendments that do not impact our area are both appropriate and welcome – such as replacing the outdated parking provisions.

In enumerating our opposition more specifically, we agree with a number of arguments that the Historic District Council makes in its opposition to ZQA. In particular, we cite the following objections to ZQA that could have applicability to our area:

- ZQA is a wholesale upzoning of the entire city, without consideration to borough or neighborhood;
- The current height limits are not proven to impede developers' decisions to participate in inclusionary housing, therefore it is not clear that they need to be raised;

- There is no study or proposed solution to preserving existing affordable units, while up-zoning could incentivize demolition of these units;
- Senior housing will be a fraction of larger market rate residential housing created; and it will not be permanent (a 30 year limit has been cited), but the new heights it will allow will be permanent;
- There is no guarantee that current affordable housing will be replaced in-kind by new development.

Some Further Comments on Specific Topics

ZQA treatment of R8B contextual zoning: R8B zoning was created in the 1980s after a great deal of research and analysis by the City Planning Commission, community boards, and civic organizations (including our own). It was not an ideal solution for everyone, but rather a compromise both within community districts and across boroughs. Following are some considerations regarding the current ZQA proposal that apply to R8B:

- Overall height limit maintained: We note and are grateful that the original R8B maximum height proposal for ZQA of 85 feet was abandoned in favor of a revised proposal that maintains the current 75-foot limit.
- Overall FAR maintained: We also note that that the current floor area limitation at an FAR of 4.0 were maintained from the start.
- Perfect matching of two constraints was never a goal: When R8B was formulated, it was recognized that in many cases the zoning envelope (height limits and setback requirements) and the allowed FAR at 4.0 for a specific building proposal would not result as a perfect match of the two, so that no allowed area (FAR) would go unused or the entire zoning envelope would be filled. Yet because both constraints were determined as part of a compromise, no one harbored the expectation that both measures could be realized at their maximum for the same project.
- Allowable front base height increase to 65 feet: While the arguments for a higher first floor to justify the maximum streetwall height (before setback) at 65 feet rather than 60 feet – namely, to allow higher (and hence affording more privacy) first floor windows for residences – seem compelling, these are not the only considerations that should apply. If the building is set back from the streetwall – perhaps in deference to the context of a predominantly existing rowhouse block – this solution to the privacy issue is less pressing, and a 60-foot maximum street wall may be workable.
- Allowable rear base height increase to the full 75 feet: The elimination of a required rearwall setback at the height of 60 feet will lead to a higher buildup of the “doughnut” wall surrounding the open rearyard space and will allow less light to reach these enclosed rear yards.
- Potential increases in floor area creates pressures for building height increases in historic districts: One result of raising the maximum allowed front streetwall to 65 feet is that it will more readily allow an R8B building to have an additional floor (from 6 to 7 floors). Yet this will create pressure on the Landmarks Preservation Commission (LPC) to allow larger additions for houses in historic districts than would be the case with no height increase in the permitted front wall. The same logic applies to the proposed elimination of the rear wall setback above 60 feet. These pressures could result in the LPC permitting taller and less historically contextual additions. Granted, some may view the magnitudes involved as minimal, yet since so many historic districts with R8B zoning are underbuilt, the added potential for increases would not be minimal and the increase in potential height could reach a tipping point that could create incentives for very significant increases in upper floor bulk and building heights in historic districts.

- Uniform depth of front street walls: It is not clear that the existing provisions to encourage to the extent possible a uniform front streetwall (in terms of setbacks from the front property line) will be maintained under the new provisions.
- Community Facilities: These are allowed an FAR of 5.1 instead of 4.0 in the Upper East Side (Community District 8), and this is the only such exception for all five Boroughs. At the time of the creation of the R8B districts there were various pending school expansion applications; with the limitations in floor area imposed by an FAR of 4.0, it was felt that 5.1 would better meet this perceived hardship for institutions with such plans. At the same time it was viewed that this exception would be phased out. This never happened. We suggest that the current zoning revision could provide an opportunity to revisit that issue.

The troublesome dormer provision for R8B: Some will view the proposed additional 5 feet in the front street wall base height to 65 feet instead of 60 feet as not unreasonable. Still we wonder if such a concession were to be approved (and we repeat that this would not be out choice) could this concession not be balanced against a give-back of the dormer provision approved with a zoning amendment in the late 1990s or early 2000s that allows very large dormers – effectively, a “set-forward” – at the top floor for a large portion (typically about one third) of the width of the street wall for buildings wider than 45 feet. An example of this is 180 East 93rd Street, a seven story apartment building, which was built in around 2008 and displaced three rowhouses (see photo at right). The developer was able to fit 7 floors into the building, even under the old zoning (although the slope of the hill may have made that possible). The major point we wish to highlight is that the dormer provision for R8B made the building top heavy and very much out of context in scale to the rowhouses on either side.



ZQA zoning proposed for Lexington Avenue (in the East 80s and 90s): Lexington Avenue, at only 75 feet in width, is considered a wide street (allowing for greater height allowances). Had it been a few inches narrower, it would have been considered a narrow street, with greater limits placed on base heights and overall heights. Instead under C1-8X the current height limit is 160 feet, and under ZQA the C1-8X on Lexington Avenue would get an additional 5 feet for base height and 15 feet for total height (to 175 feet). If the affordable senior housing option is chosen, a building would receive an additional 0.7 FAR (to 9.7) and an additional increase in height of 30 feet to 205 feet, or 45 feet taller than what it is currently allowed. However, most of the increase (and all of the upper floors created) will be used for market rate; senior housing will most typically account for only a small portion of the added height and the senior housing benefits will be limited to 30 years.

Not Covered by ZQA – Height limits for Third Avenue: Third Avenue is rightly considered a wide street. Unfortunately, it has no height limits whatever. Due to a combination of building technology advances and market forces combined with the long

existing mechanism of transferring development rights, we are now confronted with the not earlier anticipated result of as-of-right buildings with heights reaching over 600 feet and having floors that are 14 feet or more in height. While Third Avenue is beyond the scope of the ZQA proposals, we hope that the City Planning Commission can address this pressing situation and work to impose some type of height restrictions. We do note that Third Avenue is in close proximity to zoning districts covered in ZQA (e.g., it is immediately adjacent to many blocks zoned R8B), and thus it impacts a high percentage of the area of zoning districts covered by ZQA.

The contemplated ZQA elimination of sliver law provisions: We understand that the text amendment contemplates the virtual elimination of the sliver law provisions. These were originally enacted in the 1990s after in-depth deliberations. They offer protection against unsightly skylines in the districts where they apply. We feel the sliver law provisions should be kept and not eliminated.

Conclusion

We feel that ZQA in its overall scope is much too broad to allow for meaningful in-depth discussion of the individual aspects in the time allotted for this. This may not apply as fully for experts, but we feel it does apply for most interested non-experts and for most members of community boards. Just one example may illustrate this: it is our impression (though admittedly hard to establish factually) that at the community board level (in our case, Community Board 8) more time was spent to create R8B zoning in the 1980s than has been spent to consider the entire current ZQA proposal. Thus, even at the community board level meaningful discussions were essentially limited to overall generalizations or to pin-pricks of specific aspects, without allowing comprehensive and in depth review.

Thank you for your consideration of this matter.

Respectfully yours,



Lo van der Valk
President

cc

Manhattan Borough President, Gale Brewer
City Councilmember Daniel Garodnick
Simeon Bankoff, Executive Director, Historic Districts Council
James Clynes, Chair, Community Board 8



December 16, 2015

**TESTIMONY - PROPOSED TEXT AMENDMENT:
ZONING FOR QUALITY and AFFORDABILITY (ZQA)**

Mr. Carl Weisbrod
Chairman
New York City Planning Commission
22 Reade Street
New York, NY 10007

Dear Chair Weisbrod and Commissioners,

On behalf of the Fulton Area Business Alliance (FAB) I wish to testify on aspects of the proposed text amendment known as Zoning for Quality and Affordability (or ZQA). While FAB supports part of the proposal, it does not support the proposal in its entirety.

FAB is a business improvement district that runs along Fulton Street in Brooklyn's neighborhoods of Fort Greene and Clinton Hill (Community Board 2). In 2007, as a result of efforts of a broad coalition of community groups, residents, civic organizations, institutions, elected officials, the Community Board and the Department of City Planning, this stretch of Fulton Street was rezoned as a "Contextual Zoning District". This effort established height restrictions where previously there were none. Since the 1978 Landmarking of Fort Greene and Clinton Hill, the rezoning of 2007 was probably the single most successful effort by the community to strike a balance in how their neighborhoods were to be developed.

**FAB Supports the Proposed 5-Foot Increase
in Height Limits for R7A Zoning Districts**

The ZQA proposal to allow a 5-foot increase in the maximum allowable heights in an R7A district (from 80 to 85-feet), with a minimum of 3-feet required to be applied to ground floor commercial spaces is a positive change.

This change would help create higher ceilings in ground floor commercial spaces, something that would benefit retail business of the commercial corridor.

The 5-foot change to the maximum allowable height is negligible and would not be so noticeable as to alter the intention of the Contextual Zoning effort. Plus, requiring at least 3-feet of that increase to be dedicated to the ground floor commercial spaces protects the district from having the benefits accrued solely to upper-floor market-rate apartments. FAB has heard from developers, property-owners and potential retail prospects that they prefer higher ceilings and we support this change.

**Height Limit Increase from 80- to 105-Feet:
FAB Does Not Support this Part of the ZQA Proposal**

The ZQA proposal for the maximum allowable height to increase from the current 80-feet to 105-feet (an increase of 31%) **is not appropriate**. This is a substantial change that violates the very basis of the community-led effort to secure Contextual Zoning. Such a dramatic change in height limits should be rejected.

While we can appreciate the theory that this change may result in creating more affordable housing, there are a number of new developments currently under construction or in the planning stages within the FAB Alliance district that already include affordable housing. And these projects are happening under the current zoning and height limits. No additional incentives have been necessary.

Thank you for this opportunity to provide input on the ZQA Proposal.



Phillip Kellogg
Executive Director

Alloy

December 16, 2015

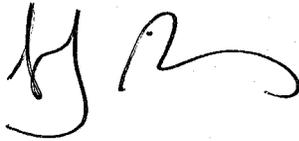
City Planning Commission
120 Broadway, 31st Floor
New York, NY 10271

Re: Testimony in Support of Zoning for Quality and Affordability

Dear Commissioners:

I am a licensed architect and a partner at Alloy, a real estate development company that's been developing residential projects in Manhattan and Brooklyn for the past 10 years. One project (459 West 18th Street) actually serves as the poster image for R8 districts in the Zoning Handbook. Given our expanded professional roles, our office reads the NYC zoning resolution through the lens of an owner, looking to efficiently allocate density to determine a program, and as an architect, looking to implement thoughtful and compliant solutions for that program. The proposed Zoning for Quality and Affordability should be seen as nothing more than an ambitious attempt to improve the quality of housing in the City and encourage housing development residents will be proud of. Based on the material available, I see no 'backdoors' or 'loopholes' that would allow any of the perverse results: There is no possibility of adding floors given the more flexible building height language, nor any ability to increase density (units) given the zoning envelope flexibility. The proposed relief on parking requirements is an obvious evolution the development community has been noting for years. I support the proposed ZQA text amendment and encourage the same from the council members.

Sincerely,



AJ Pires
Partner, Alloy Development



October 21, 2015

Carl Weisbrod, Chairman
NYC City Planning Commission
22 Reade Street
New York, NY 10007

RE: Zoning for Quality and Affordability (ZQA) Proposal

Dear Chairman Weisbrod:

The Myrtle Avenue Brooklyn Partnership wishes to submit comments regarding the proposed Zoning for Quality Affordability (ZQA) text amendment. After reviewing the materials online at DCP’s website and attending two presentations to the public from DCP staff, we would like to outline our concerns as follows.

Our concern relates to the proposed increase in height of 20 feet within contextual Inclusionary Housing districts for developments that include the required number of affordable units and minimum ground floor height of 13 feet. We are concerned that this increase of 20 feet – or two stories – from 85 feet to 105 feet could create non-contextual buildings along Myrtle Avenue (a large portion of which is currently within an Inclusionary Housing district and zoned R7A) without bringing more affordable housing than is provided for in the current Inclusionary Housing district.

We support incentives that might facilitate the creation of more affordable housing, which is why we advocated and supported the addition of the Inclusionary Housing district to Myrtle Avenue. While the creation of an Inclusionary Housing district allowed for new buildings to rise higher than existing buildings on Myrtle Avenue, we supported the introduction of taller buildings in hopes this would create affordable housing opportunities. It is our understanding that it not the size of the building envelope under the current Inclusionary Housing guidelines that is preventing the development of affordable housing. Developers mention the administrative burden (extensive filing requirements) and other ‘red tape’ that prevents projects from progressing at the speed at which the market moves, so they choose to *not* take advantage of bonuses in exchange for moving a project forward more quickly.

The provisions within ZQA do no address this, and we don’t think they will be effective in incentivizing the development of more affordable housing. Since ZQA doesn’t provide additional FAR, we may end up with buildings that are 20 feet taller within contextual Inclusionary Housing districts (read: grossly out-of-context), without generating any more additional affordable units than are currently allowed.

The majority of soft sites along Myrtle Avenue that could potentially take advantage of the proposed height are adjacent to the predominant building typology along the commercial corridor, which includes late 19th century, three-story masonry row buildings. To allow 10-story buildings to rise within the existing built environment

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would greatly, not subtly, alter the character of Myrtle Avenue, again without the benefit of more affordable housing than is currently provided for under the current zoning.

We strongly encourage the Commission to reevaluate the proposal to increase building heights by 20 feet, or two stories, within all Inclusionary Housing districts mapped within contextual zones R7 or above. We believe the additional allowable height will produce taller, and further out-of-context buildings, possibly without creating any additional benefits – either affordable housing or better quality designed buildings – for the community.

Lastly, we feel it necessary to comment on the additional five foot height increase proposed for market-rate developments within several of the contextual districts in our neighborhood. We also feel that the additional height here will not create more contextual developments, as the use of the additional height is optional and not mandatory. With that said, we do feel compelled to voice concern about raising height limits within districts that were rezoned in 2006. This zoning change, born about after an intense community engagement process, created height limits that local residents shaped and agreed were best for our neighborhood. We are concerned that this proposal ignores the outcomes of the community-driven rezoning. Again, while we do not foresee the height increase as either benefiting or harming quality development with our neighborhood, we feel that overriding the community-driven rezoning is the most harmful aspect of this proposal.

We thank you for your time and for you endeavoring to promote the creation of higher quality and more affordable housing for New Yorkers.

Sincerely,

A handwritten signature in black ink, appearing to read 'M. Almeida', with a long horizontal line extending to the right.

Meredith Phillips Almeida
Executive Director

CC: Council Member Laurie Cumbo, 35th Council District
Letitia James, Public Advocate
Assembly Member Walter Mosley, 57th District
Shirley McRae, Chairperson, Brooklyn Community Board 2
Rob Perris, District Manager, Brooklyn Community Board 2
Alex Sommer, DCP Brooklyn Borough Office
Dr. Thomas Schutte, Myrtle Avenue Brooklyn Partnership Board Chair



Testimony before the New York City Planning Commission

On the Proposed Environmental Impact Statement (EIS) Related to
the proposed Zoning for Quality and Affordability Initiative

LeadingAge New York

December 16, 2015

Long term care in New York is being transformed. Today's elders want to live independently as long as possible and remain active participants in their communities. At the same time, policy-makers are advancing new models of care that incentivize better health outcomes and higher quality at a lower overall cost. Nursing homes, assisted living facilities, retirement communities and independent senior housing are being reinvented to meet the needs and preferences of a rising number of aging New Yorkers, and to reflect new ways of delivering and paying for health care and supportive services.

LeadingAge New York members are at the forefront of these changes. Nonprofit providers of homes and services for elders, as well as managed long term care plans, are rethinking the way that we provide and pay for elder housing and the services that people need as they age. The proposed changes to the New York City Zoning Resolution that are part of the Zoning for Quality and Affordability (ZQA) initiative are critical to the future of the elder care continuum that serves the growing contingent of aging New Yorkers. We urge you to support the proposed changes.

The current zoning regulations place unnecessary barriers to developing independent senior housing and aging services in ways that meet current needs. The ZQA proposal would change the current square footage ratio, making it easier for senior housing owners to develop appropriately sized units, with the common space necessary to include supportive services that are essential to keeping seniors healthy in their homes.

The ZQA proposes allowing slightly taller buildings, when the ground floor height is increased. This provision will make it easier to include commercial space with attractive storefronts which improve neighborhoods. It also makes it easier to co-locate health related services such as primary care physicians' offices, adult day health care programs, and Federally Qualified Health Centers (FQHC) that are so critical, especially in low income communities.

The ZQA proposals change outdated definitions of senior living communities, which will remove barriers to locating similar types of communities on the same property, or campus. This is critical as providers must make the most efficient use possible of valuable land for new construction of housing.

Perhaps most importantly, the proposed amendments change requirements for parking in senior living communities. A recent study by one of our partner organizations identifies 39 underutilized parking lots adjacent to existing senior housing buildings. If fully developed, these empty spaces could accommodate more than 2,000 new units of senior housing. With waiting lists for senior apartments reaching the thousands in many neighborhoods, this change is essential to meet existing and growing need for affordable senior housing.

The elder care continuum is adapting to changes in the way that long term care is provided and paid for in New York State. The proposed changes that are part of the ZQA will help these nonprofit providers to better fulfill their shared mission of helping New York's elders to age in good health, while maximizing their independence and engagement with their communities. We urge your support of the changes.

www.LeadingAgeNY.org

Coalition Against the Mayor's Rezoning Plan

October 15, 2015

Carl Weisbrod, Chairman
New York City, City Planning Commission
22 Read Street
New York, New York 10007 (Via email)

OFFICE OF THE
CHAIRPERSON

OCT 20 2015
2 88 56

Re: Zoning for Quality and Affordability (ZQA)

Dear Chairman Weisbrod:

We represent a growing number of concerned civic leaders of the Bronx united in opposition to Mayor de Blasio's proposed Zoning for Quality and Affordability text amendments. While we heartily endorse the objective of increasing affordable housing opportunities in our community and throughout New York City, we believe that the City can achieve its affordable housing goals under the current zoning. Utilizing 421a and other tax incentives, developers can already build taller, denser buildings with fewer required parking spots.

Our concern with the Mayor's plan is that the outer boroughs will bear the brunt of the inevitable onslaught of high-density development and its unintended consequences:

- Loss of open and green space, air, light, views, and neighborhood character
- Increased circling to find fewer parking spaces due to the elimination of onsite parking requirements for new subsidized development in "transit zones," and reduced parking requirements elsewhere.
- Flooding and sewerage backups as aging infrastructure fails to accommodate the building boom
- Overcrowded schools
- Increased bulldozing of private homes and businesses appropriately scaled to their communities, and replacing them with behemoths.
- High density building in parking lots of existing nursing homes (by special permit)

The Mayor's upzoning plan contradicts the goals of communities throughout New York City. ZQA would negate years of careful planning that produced *Community District 8 2000: A River to Reservoir Preservation Strategy*, a 197-a plan adopted by the City Planning Commission and the City Council in 2003. Indeed, pursuant to this official City policy a series of zoning actions to "preserve the scale and character of area neighborhoods" was enacted for North Riverdale, Central Riverdale, Spuyten Duyvil, Van Cortlandt Village and others, plus text amendments for the Special Natural Areas District and expansion of SNAD boundaries.

Furthermore, city-wide zoning amendments under consideration will allow multi-family apartment buildings to be constructed in low density R-1 and R-2 single family residential areas. These multi-family apartment buildings, referred to as CCRCs (Continuing Care Retirement Communities), are, in reality, high-rise apartment houses. If permitted in R-1 and R-2 Residential Zoning districts, they will destroy the character of these low-density districts.

Coalition Against the Mayor's Rezoning Plan

Another issue is the reduced size of affordable units in order to increase profitability. Families and seniors who qualify for affordable housing deserve livable space. Current zoning allows units to be as small as 400 square feet, whereas the proposed text has eliminated that minimum to allow developers to build even smaller micro-units.

We urge you to support the preservation and rehabilitation of the existing housing stock. A good affordable housing plan would increase real code enforcement, finance capital improvement loans for private housing, and infuse major capital funding to restore and repair NYCHA buildings. This proposal, on the contrary, incentivizes the allocation of taxpayer funds to developers under the guise of building affordable housing. Actually, many developers would be building largely expensive market rate units. This will only create a relatively small number of affordable units (20% or 30%) at various income level qualifications. It is a well-established fact that "affordable" housing built in the Bronx is often more expensive than the existing (and better) housing stock it replaces.

The proposed action is an ineffective and expensive policy change that will burden taxpayers with needed infrastructure costs to support the increased housing density.

These are some of the reasons we have urged Community Board 8, Councilmember Andrew Cohen, and Borough President Reuben Diaz to oppose the proposed Zoning for Quality and Affordability plan and take a leadership role to protect the Northwest Bronx, its green and open space, infrastructure, parking, and neighborhood scale.

Please feel free to contact Jennifer Klein at 917- 690-6008 or email riverdalecommunitycoalition@gmail.com.

Sincerely,

Sura Jeselsohn
Along the Hudson Homeowner's Association

Laura Spalter, Damian McShane
Broadway Community Alliance

Stuart Gartner
CPR

Patrick Burke
Fieldstondale Cooperative

Jodie Colón, Tony Thoman
Friends of Spuyten Duyvil

Richard Baldwin, Jennifer Klein, Marty Zelnik
Riverdale Community Coalition

Peter Kohlmann, Robert Lynch, Sherida Paulsen
Riverdale Nature Preservancy

Avi Henoch
Riverdale Safe Streets

Frank Analante, Gary Klingsberg
Riverdale-Spuyten Duyvil Coalition

Josephine Perella
Robin Hill Association

Marty Zelnik
Sigma Place Homeowner's Association

Thomas Owens
Skyview on the Hudson

Deirdre Burke
Vinmont Homeowners Association

To: Carl Weisbrod, Director
NYC Department of City Planning
22 Reade Street, New York, NY 10007-1216
Email: AHOUSING@planning.nyc.gov
and
Shirley A. McRae, Chairperson
Robert Perris, District Manager
Community Board Two, Brooklyn
360 Jay Street #8, Brooklyn, NY 11201
Email: cb2k@nyc.rr.com

From: **Society for Clinton Hill**, Anne Bush, President
300 Dekalb Ave., Brooklyn, NY 11205
Email: amb9018@gmail.com and
Fort Greene Association, Richard Norton, Acting Chair
Box 170563, Brooklyn, NY 11217-0563
Email: denorville1066@msn.com

To Whom it May Concern:

Members of our respective organizations have been following the recent rezoning proposal designated "Zoning for Quality and Affordability" with respect to its potential effects on communities across New York City. Our members have read the material published by the NYC Department of City Planning; attended the NYC Department of City Planning presentation at Pratt Institute on September 28; and held a joint meeting addressing the issue on October 14, at which we hosted both Benjamin Dulchin of the Association of Neighborhood Housing Development and Simeon Bankoff of the Historic Districts Council.

We oppose this rezoning proposal on the following grounds:

- 1) if approved, it will grant benefits to developers City-wide without any mandatory requirement for affordable housing to be included in the larger buildings it permits, and without regard to neighborhood-specific restrictions implemented over many years at the request of, and subsequent to much labor contributed by, local groups like our own. This proposed legislation reads simply as a giveaway to developers; it may also incentivize them to acquire and raze smaller buildings currently occupied by tenants paying affordable rents, displacing them in favor of larger buildings catering to market rate tenants.
- 2) In the words of HDC's position paper on the subject, "it takes the context out of contextual zoning. It arbitrarily raises height limits and diminishes yard requirements across the city...not based in the actual built fabric of our city's neighborhoods. New York thrives because of the diversity of its neighborhoods, yet this proposal's approach will deal with each neighborhood as the same, with a one-size-fits-all approach....It should be prescribed that only units constructed for affordable or senior housing receive height bonuses, which would incentivize construction of the housing stock that is the

genesis of this proposal and that the City so desperately needs. At this moment, the proposal incentivizes all development, without any guarantee that it will actually house New Yorkers who are rent-burdened...Bigger buildings do not equal lower rents; if that were the case, West 57th Street would be Manhattan's newest neighborhood for the middle class. There is also no explanation of how building higher will mandate construction of quality buildings."

3) With affordable housing non-mandatory in this proposed rezoning initiative, and no mechanism for insuring that it would produce "Quality" of any kind, the City is asking us to believe that height limits alone determine a developer's decision to opt to produce affordable housing. But developers are much more likely to take advantage of the increased height and density offered in this proposal by constructing market rate housing at a far greater profit.

This proposed zoning resolution, as drafted, guarantees neither quality nor affordability; it is simply guaranteed to enable developers to make more money. We therefore urge our elected representatives to resist the pressure from the real estate industry that produced this proposal. We further urge that all height increases for solely market rate housing in contextual zones, as well as for so-called "Quality" housing in non-contextual zones, be removed from this initiative in favor of a per-project evaluation showing that such changes would actually, in each specific case, provide substantially more affordable housing - whether for seniors or others - in perpetuity.

Sincerely,

Anne Bush
President, Society For Clinton Hill

Richard Norton
Acting Chair, Fort Greene Association

cc: Public Advocate Letitia James – ljames@pubadvocate.nyc.gov
Brooklyn Borough President Eric L. Adams – askeric@brooklynbp.nyc.gov
Representative Hakeem Jeffries -
Assemblyman Walter T. Mosley -mosleyw@assembly.state.ny.us
State Senator Velmanette Montgomery – montgome@nysenate.gov
City Council Member Laurie A. Cumbo – lcumbo@council.nyc.gov
District Leader, 57th AD, Olanike Alabi – olanike.alabi@gmail.com

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

Criterion Group is a real estate development company that has designed and constructed 4 market rate buildings within Community Board 1:

- 11-15 Broadway, Astoria, NY 11106
- 12-15 Broadway, Astoria, NY 11106
- 30-50 21st Street, Astoria, NY 11102
- 26-38 21st Street, Astoria, NY 11102

All of these projects were impacted by the existing, outdated zoning which ZQA seeks to change. For example, we could not utilize all of the available FAR and due to height and envelope limitations, we were forced to provide apartments at the street level with no offset from street wall and/or lot line.

The ZQA explains that there are problems created by not setting back the building and elevating the ground floor units above the sidewalk, producing substandard ground floors and flat dull buildings. We experienced these problems with the aforementioned buildings:

- Since the apartment were built along the lot lines at the ground level, any pedestrian passerby can see into or access the ground level apartment.
- To maintain privacy, tenants would install blinds and shades, causing a loss of natural lighting, which is a part of the window light and air requirements in the zoning codes.
- Fresh air and noise mitigation is limited at the ground level
- There is an increased risk for the ground level due to weather, particularly flooding, whether it be from a natural waterway or a broken water main and/or sewage line.
- With the increase use of P-TAC units to provide heating and cooling, the risk of a water from floods and snow melt will flow unrestricted through the P-TAC Unit into the apartment.

Naturally, these issues are a cause for concern. We are designing a new development at 30-77 Vernon Blvd, Astoria, NY 11102, which will also face these issues without the approval of ZQA. This development, an optional 80/20 affordable inclusionary housing project, has a total of (711) units within the development, with (142) of those units as Inclusionary-Housing. Under the current height and envelope limitations imposed on the project, we are unable to wholly fit the "As of Right" Market Rate Floor Area and ceiling height will be limited. Therefore, we cannot even consider providing the 20% inclusionary-Housing Units.

The QZA would provide many benefits, such as:

- Greater flexibility in design: interesting setbacks can be utilized in the design, since we would not be required to build the entire face of the building to the lot line in order to maximize the entirety of the available "As of Right" Market Rate Floor Area.
- Increased height will allow sensible ceiling heights:

- For example, when you consider a typical floor height of 8'-8" required to maximize the Market Rate Floor Area, it does not provide much head clearance when construction is completed.
 - A minimum slab thickness of 10" is required to comply with ADA requirements due to a required recess for the shower pit for a wheelchair to roll into the shower.
 - Once you add flooring (*approx. 1.5" to 2" depending on the product and underlayment*), HVAC ventilation (*approximately 8" with minimum clearance*), lighting, wiring, gypsum construction with sound/fire proofing on the ceiling. The total unrealized space used is approximately 22" – 24". This reduces the unit's finished ceiling height to 6'-8" to 6'-10.
 - All doors are required at a minimum by code to be 6'-8" in height. Which is the minimum available ceiling height mentioned above.
 - At all required setbacks from the lot line at the upper level transfer beams or thicker floor slabs will be needed to carry the weight of the required setback's exterior wall. This causes an even greater conflict with the minimum codes. This reduces the ceiling below the 6'-8" minimum heights.
 - At these cramped ceiling heights the average person can touch the ceiling while standing upright on the floor
- Under the proposed amendment, landlords can create higher ceilings in the Main Lobby without cutting a hole in the 2nd floor resulting in unused Market Rate Floor Area.
 - Finally, the ZQA will reduce unnecessary parking requirements for affordable housing, which actually hamper the production of housing.
 - In transit-accessible neighborhoods, households own many fewer cars, and frequently don't use the parking that has been provided and current requirements of 50% of dwelling units.
 - Parking requirements impose unrecoverable costs on affordable housing: it can cost as much as \$50,000 per space to build off-street parking and the price per parking spot is very expensive—for example, most new developments charge at least \$300/spot, which is over 1/3 of the affordable housing rent, not to mention at least \$200/month in lease payments and \$2,000/year in insurance payments.
 - Alternatives to owning/leasing a car; zipcar and other car sharing programs

From: [Hal Bromm](#)
To: [Affordable Housing Text \(DCP\)](#)
Subject: Re: MIH/ZQA Dec 16 CPC Public Hearing
Date: Tuesday, December 22, 2015 11:21:33 AM

Dear Chair Weisbrod,

Last week your agency, the City Planning Commission, turned away hundreds of citizens at the “public” hearing on ZQA/MIH. The failure of your agency to anticipate a large public turnout for one of the most hotly debated and criticized rezoning proposals of our City’s history was short-sighted and seemingly intentional. To not accommodate the profound public interest in this issue is a terrible lapse for your agency.

That individuals and civic groups were kept out of this hearing is an affront to our city and its democratic process of public participation. Public hearings are critical tools to provide citizens who are able to take time from their jobs and lives a voice in decisions affecting their communities and neighborhoods. Denying access to those who made the effort to attend your hearing is an alarming failure of public policy and violates the spirit and intention of the Uniform Land Use Review Process.

Your agency failed to plan adequately to provide a public forum to allow all New York's citizens to be heard last week. A second public hearing should immediately be scheduled to allow those who were left out in the cold to testify. To deny the public a second opportunity by failing to hold another hearing would represent an even greater planning failure.

Yours sincerely,

Hal Bromm

Hal Bromm Art & Design

Est. Tribeca 1975

212.732.6196

90 West Broadway
New York 10007

On Mon, Dec 21, 2015 at 3:02 PM, Affordable Housing Text (DCP)
<AHOUSING@planning.nyc.gov> wrote:

Thank you for your message regarding the December 16th public hearing on the MIH/ZQA text amendment proposals.

We had an incredible turnout, in which more than 110 people testified and hundreds more attended the 13+ hour hearing, lasting until the final speaker testified shortly after 10 PM. We were advised by museum security that the auditorium was temporarily at capacity for a short while in the morning. DCP staff went outside to offer to sign up those waiting in line and provided them with assigned numbers and instructions to follow the progress throughout the day on social and mainstream media. A number of people signed up and returned later in the day, which is typical of public hearings where many people wish to speak. We, and other

media partners, continued to post speaker numbers and that the hearing was ongoing on Twitter and the DCP website, and that it would remain ongoing until everyone who was present was able to speak. Every speaker who signed up to speak and was present was given an opportunity to testify.

For those who did not testify at the hearing and would like to submit written testimony at any time prior to the vote, written comments on the DEIS will be considered until Monday, December 28 and written comments on the application may be sent up to the date of the Commission vote. Written testimony is read, synthesized and addressed in the City Planning Commission report, reviewed in advance of the vote.

You can submit written comments by email to AHOUSING@planning.nyc.gov or mail to:

CITY PLANNING COMMISSION

Calendar Information Office - 31st Floor

120 Broadway, New York NY 10271

From: [Zeidman, Dorothy](#)
To: [Affordable Housing Text \(DCP\)](#)
Subject: ZQA/MIH
Date: Tuesday, December 22, 2015 3:36:10 PM

Dear Chair Weisbrod,

Last week your agency, the City Planning Commission, turned away hundreds of citizens at the “public” hearing on ZQA/MIH. The failure of your agency to anticipate a large public turnout for one of the most hotly debated and criticized rezoning proposals of our City’s history was short-sighted and seemingly intentional. To not accommodate the profound public interest in this issue is a terrible lapse for your agency.

That individuals and civic groups were kept out of this hearing is an affront to our city and its democratic process of public participation. Public hearings are critical tools to provide citizens who are able to take time from their jobs and lives a voice in decisions affecting their communities and neighborhoods. Denying access to those who made the effort to attend your hearing is an alarming failure of public policy and violates the spirit and intention of the Uniform Land Use Review Process.

Your agency failed to plan adequately to provide a public forum to allow all New York’s citizens to be heard last week. A second public hearing should immediately be scheduled to allow those who were left out in the cold to testify. To deny the public a second opportunity by failing to hold another hearing would represent an even greater planning failure.

Yours sincerely,

Dorothy

Dorothy Zeidman

Licensed Associate Real Estate Broker
The Corcoran Group
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o: 212.941.2603
m: 917.912.8006
DZ@corcoran.com
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*2014 Multi-Million Dollar Club Member
NYRS Certified New York Residential Specialist*

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The Corcoran Group is a licensed real estate broker.

December 15th, 2015

Dear Mayor de Blasio,

As City Commissioners and City Councilmembers consider your Mandatory Inclusionary Housing plan, as faith leaders we find it essential to share our deep concerns with a plan that does not truly address the crisis of affordable housing in our city.

In our congregations, in our communities, and in our service every day we come across New Yorkers who are facing the pressure of rising rents. We are facing the rising tide of homelessness from families that have been pushed from their home. Increasingly, our own congregants - and sometimes our houses of worship themselves - are forced to move because of this crisis.

This administration is taking new approaches towards solving this crisis through applying the Mandatory Inclusionary Housing policy to new development in rezoned areas - a step which is to be applauded. However, these efforts fall far short of the needs in our communities.

The current proposed Mandatory Inclusionary Housing Plan creates just 3 options for neighborhoods to choose from, with affordability levels defined by the Average Median Income (AMI) of the city as a whole plus Westchester County - not our own communities.

These options - one with 25% of units priced with rents at 60% of AMI, or rents affordable for a family of 3 earning roughly \$46,620 per year; one with 30% of units at 80% of AMI, or roughly \$62,160 for family of 3; and one with 30% of units at 120% of AMI, or incomes of \$93,240 for family of 3 - leave the majority of units far beyond the average income of our congregants and community residents. In any given neighborhood or rezoned lot, this policy sets the floor for development to include 70-75% of all new housing as market rate housing - hastening the wave of gentrification we are witnessing.

According to a detailed analysis soon to be released from the Community Service Society of New York, in neighborhoods slated for rezoning like East New York, West Flushing, East Harlem, Inwood, & Jerome Ave in the Bronx, the majority of households earn less than 50% AMI - or \$38,850 for a family of 3. This means that the "cheapest" housing built under MIH would be unaffordable for the majority of our communities. Even in a neighborhood like Long Island City that has already changed significantly because of previous rezoning, more than 39% of the residents make less than 50% AMI, meaning this policy leaves them behind completely.

And in all options, the issues of local hiring, wage standards, benefits and apprenticeship utilization are completely left out. We are concerned about poor labor standards, and are dismayed that we will forgo an opportunity to create pathways for employment in our communities.

When the administration's solution, MIH, does not meet the needs of most residents, we are leaving behind far too many. We are leaving behind the most vulnerable in our city. We are leaving behind the majority of workers in our city who cannot make enough to afford rising rents. We are leaving behind the parents of the children in our schools. We are leaving behind our congregations and our communities. As faith leaders, we cannot stand for such a policy.

As a diverse group of faith leaders, today we stand with the Real Affordability for All Coalition, the Community Boards, and Borough Presidents who are all calling for truly affordable housing in any Mandatory Inclusionary Housing plan. We are calling for an affordable housing policy that assures that workers are hired from our local communities and are paid just wages and benefits. We are calling for a better plan, or no plan at all. We stand

united in our conviction that we must use all of our creative powers to find ways to assure that development benefits all New Yorkers, but especially those most in need.

For those of us from Abrahamic faith traditions, we look to Amos 5:11 as we make our decision: You trample the poor, stealing their grain through taxes and unfair rent. / Therefore, though you build beautiful stone houses, you will never live in them.

Our blessings and prayers are with you and your administration to find a path forward that includes truly affordable housing for our communities and our city.

Onleilove Alston, Executive Director, Faith in NY
Rev. Clifton McDowell, The Church of God of East New York, Brooklyn
Bishop Joseph N. Williams, Senior Pastor, Christ Church International, Jamaica, New York
Rev. Patrick Young, Pastor, First Baptist Church, Queens
Reverend John Grable, First Church of God, Far Rockaway, NY
Rev. Dr. Ernest H. Jones, Pastor, Greenwood Baptist Church, Brooklyn
Rev. Dr. Scott M. Kenefake, Interim Senior Minister, Fort Washington Collegiate Church
Bishop M. Philip Crichlow, East Mt Olive Baptist Church, Harlem NY
Rev. Dr. Arthur W. Davenport, Senior Pastor, First Church of God, Far Rockaway
Mackenzie Reynolds, Rabbinic Intern, Jews for Racial and Economic Justice, Manhattan
Nigel Loncke, Chaplin, Arverne Pilgrim Church, Queens
Pastor Brian C. Ellis-Gibbs, Queens Baptist Church, Queens
Pastor Darrell Thomas, Christ Church Int'l, Jamaica NY
Cassandra Rose, Brooklyn Tabernacle Church, Brooklyn, NY
Alex Weissman, Cooperberg-Rittmaster Rabbinical Intern, Congregation Beit Simchat Torah, Manhattan
Marc Greenberg, Executive Director, Interfaith Assembly on Homelessness and Housing, NYC
Father John P. Duffell, Pastor, The Church of the Blessed Sacrament, Manhattan
Rev. Francis Shannon, pastor Blessed Sacrament Church, Cypress Hills, Brooklyn
Msgr. Fernando Ferrarese, Pastor of Immaculate Conception R.C. Church, Astoria, Queens
Pastoral Associate, Sr. Patricia Reills, Our Lady of Fatima Church, Queens
Rev. Julie Hoplamazian, Grace Church Brooklyn Heights
Imam Alfred Mohammed, Religion Means Alive Ministry
Father Stephen Mimnaugh, OFM, Church of St. Francis of Assisi
Valerie A. Ross, Community Minister for Social Justice, Judson Memorial Church, NYC
Rev. Patricia Haggler, Ph.D., Assistant Pastor, Antioch Baptist Church of Corona, Queens
Pastor Anna Rieke, Two or Three Project, Manhattan
Fr. Julian S. Jagudilla, OFM, Executive Director, Migrant Center at the Church of St. Francis of Assisi
Rev. José Humphreys, Metro Hope Covenant Church, East Harlem, NYC
Pastor Arthur R. Barnes, Abundant Life Transformation Seventh Day Sanctified Church, NY, NY
Reverend John L. Scott, St. John's Baptist, Harlem
Imam Souleimane Konate, Masjid Aqsa-Salam, General Secretary of the Council of African Imams in America, 23 East 115th Street, New York NY 10029
Rev. Mark L. Williams, Bethel Gospel Assembly, Manhattan
Guthrie Graves-Fitzsimmons, Fellow for Social Justice Ministry, Fort Washington Collegiate Church
Bridget Kelso Anthony, Minister, Fort Washington Collegiate Church
Rev. Dr. Donna Schaper, Senior Minister, Judson Memorial Church

F. Interested Public

New York's Mandatory Inclusionary Zoning Plan in National Perspective

Alex Schwartz
Professor of Urban Policy
The New School

Author of *Housing Policy in the United States* (Third Edition), Routledge, 2014
Managing Editor for North America, *Housing Studies*

Submitted to New York City Planning Commission
Dec. 16, 2015

New York City is one of more than 500 local governments in the United States that have adopted some form of inclusionary zoning to help meet their need for affordable housing. Most of these jurisdictions are suburban. Most are also located in the states of California, New Jersey, and Massachusetts, where municipalities are required by law to provide affordable housing. However, several major cities have instituted inclusionary zoning independently of state legislation. In this testimony I will situate New York's proposed inclusionary zoning plan with other inclusionary programs, especially those of other major cities.

Background

Inclusionary zoning (sometimes also called inclusionary housing) refers to local policies that incentivize and/or require private developers to provide affordable housing. Inclusionary zoning programs vary widely in many respects, including:

- the ways by which developers may provide this housing (as part of market-rate developments, construction of separate affordable developments, through in-lieu fees, land donations or other means);
- the required "setaside" for affordable housing;
- the minimum size of a development subject to the program;
- the definition of affordability;
- the extent to which programs focus on rental or owner-occupied housing;
- the use of density bonuses and other incentives;
- the geographic scale of the program;
- the duration of affordability restrictions;
- and whether the program is voluntary or mandatory.

The Community Land Trust Network and the Center for Housing Policy recently identified 512 inclusionary zoning programs in 487 jurisdictions in 27 states, plus

the District of Columbia.¹ Nearly two-thirds of all programs are located in California and New Jersey, where local governments have often employed inclusionary zoning to comply with state requirements to provide a portion of statewide or regional need for affordable housing.² Data on the amount of affordable housing created through inclusionary zoning is fragmented and incomplete. Calavita and Mallach estimate that inclusionary programs have produced 129,000 to 150,000 units of affordable housing as of 2010, with California accounting for about half of the total.³ Most likely, inclusionary zoning programs have now produced about 200,000 units of affordable housing, although a portion of this housing has reverted to market-rate occupancy.

Although most inclusionary zoning was originally a suburban phenomenon, and most jurisdictions with inclusionary zoning are still suburban, a growing number of cities have also established inclusionary zoning. Besides New York, these cities include Boston, Chicago, Denver, San Francisco, Seattle, and Washington, DC.

Overview of Other Urban Inclusionary Zoning programs

Table 1 summarizes key elements of the inclusionary zoning programs of Boston, Chicago, Denver, San Francisco, and Washington, DC. Several points stand out in relation to New York's proposed program:

First, New York is the only city to require that all inclusionary units be rental. Of the five cities, four allow for owner and rental units; Denver restricts its inclusionary program to owner occupied units only⁴.

¹ The Community Land Trust Network and the Center for Housing Policy, National Directory of Inclusionary Housing Programs (July 2014). Washington, DC: author. <http://cltnetwork.org/wp-content/uploads/2014/08/National-Directory-of-Inclusionary-Housing-Programs-8-26-14.pdf>. See also Robert Hickey, Lisa Sturtevant, and Emily Thaden, "Achieving Lasting Affordability through Inclusionary Housing." Cambridge, MA: Lincoln Land Institute, 2014. https://www.lincolnst.edu/pubs/dl/2428_1771_Achieving%20Lasting%20Affordability%20through%20Inclusionary%20Housing%20-%20Final%20-%2006-9-14-NS07-14.pdf

² Rick Jacobus. *Inclusionary Housing: Creating and Maintaining Equitable Communities*. Cambridge, Lincoln Land Institute, 2015. https://www.lincolnst.edu/pubs/dl/3583_2928_Inclusionary_Housing_web.pdf. Nico Calavita, and Alan Mallach, eds., *Inclusionary Housing in international perspective: Affordable housing, social inclusion, and land value recapture*. Cambridge, MA: Lincoln Institute of Land Policy, 2010.

³ Calavita & Mallach, p. 26.

⁴ Denver limits its mandatory inclusionary zoning to condominiums out of concern that restrictions on rents would violate prohibitions against rent regulation (Hickey et al., 2014).

Second, New York targets a higher percentage of units for affordability. Table 1 shows that the five cities target 10 to 15% of all units for lower income occupants. The New York City program would target 25 or 30% of all units.

Third, New York City's income requirements are roughly similar to those of the other cities. Under the current plan, Option 1 would require units to be affordable to households earning 60% of Area Median Family Income (AMI), and Option 2 would lift the affordability definition to 80% of AMI. Option 3, which would apply in certain neighborhoods outside Manhattan, would put affordability at 120% of AMI. In comparison, the maximum eligible income for affordable rental units in the five cities shown in Table 1 varies from 50 to 70% of AMI. It is important to note that unlike New York, these cities also allow developers to provide affordable units for owner-occupancy. Here, the maximum incomes vary from 50 to 100% of AMI.

Fourth, New York is similar to Boston and Chicago in connecting inclusionary requirement to development that involves a change in zoning. In contrast, Inclusionary zoning in Denver, San Francisco, and Washington applies across the city, although in some cases, such as San Francisco, the setback is higher in neighborhoods that have recently been upzoned.

Fifth, all of the cities except for Denver allow alternatives to on-site provision of affordable housing, including payment of in-lieu fees and construction of affordable housing at a separate location. In some instances, such as San Francisco, developers are required to provide a higher percentage of affordable units when they do not provide the units in the same development as the market-rate housing.

Finally, the cities vary in the duration of their affordability requirements. While San Francisco and Washington D.C., like New York's proposed program, mandate perpetual affordability, the affordability period in the other cities varies from 15 years in Denver to 50 in Boston.

Concluding Comments

New York City's proposed mandatory inclusionary zoning is consistent with other inclusionary zoning programs, especially those of other large cities in the U.S. The main difference is that New York's program requires developers to provide a larger percentage of affordable units (25 to 30%), and the program requires all developers to provide affordable rental housing. New York differs from some cities in applying inclusionary requirements only in areas that have been upzoned or for developments that require a zoning variance for increased density. New York, like most jurisdictions, would give developers the option of building affordable units at other locations or paying an in-lieu fee.

It is important to emphasize that inclusionary zoning is based on a trade-off between the percentage of units that developers must provide for lower-income

occupants, and the targeted income of these occupants. The lower the income, the lower the percentage of affordable units. New York's program, as noted above, involves a higher percentage of affordable units than is the case in most if not all inclusionary zoning programs. Under Option 1 25% of all units would be allocated to households earning no more than 60% of AMI, and under Options 2 and 3, 30% of the units would be allocated to households earning up to 80% and 120% of AMI, respectively. The income targeting of Option 1 is consistent with the income targeting of other cities' inclusionary zoning programs for rental housing; lower for those in owner-occupied housing. The income eligibility standards for options 2 and 3 are higher than those for rental housing in other inclusionary zoning programs but involve a much higher set-aside for affordability.

In some of the most expensive neighborhoods, it may be possible to target households with incomes lower than 60% of AMI with a 25% set-aside, but this would be feasible without additional subsidy in only the most robust local housing markets; otherwise, deeper income targeting will require a reduction in the number of units that are allocated for affordability; or a system in which income targeting is divided between extremely low income households and households with moderate incomes (e.g., 30% of AMI and 80% of AMI, but no households with incomes between 30 and 80% of AMI).

Many people have expressed concern about the risk of inclusionary zoning stimulating broader rent increases within the existing housing stock, putting residents at risk of displacement. Unfortunately, there have been no studies of the impact of inclusionary zoning on rents in broader neighborhood housing markets. However, it should be pointed out that absent inclusionary zoning, this housing could still be at risk of inflationary pressures due to the continued growth in housing demand. That said, the city's investment in expanded legal assistance for tenants in neighborhoods slated for inclusionary zoning seems very sensible.

Finally, it is important to emphasize that inclusionary zoning is only one means of addressing the need for affordable housing. Indeed, nationally, it has produced less than 250,000 units over the past two decades—far less than half of what the Low Income Housing Tax Credit finances in a single year. Clearly, inclusionary zoning cannot by itself reach the New York City's current goal of producing 80,000 new affordable housing units over 10 years. But it will enable the city to leverage the private sector to produce a portion of the city's affordable housing goals. Moreover, by producing units affordable to low- and moderate-income households, inclusionary zoning enables the city to concentrate its direct subsidies on lower income households.

Table 1--Overview of Inclusionary Zoning Programs in Selected US Cities

City	Year Instituted	Mandatory/Voluntary	Minimum Units	Affordability Duration	In-lieu fees/other alternatives to on-site affordability	Percent Affordable		Income Target (% of AMI)
						Rental	Owner	
Boston	2000	Mandatory, with Zoning Change	10	50 years	Yes	15%	15%	50% <=80%; 50% 80 to 100% AMI
	2003	Voluntary	10	30 years	Yes	10%	10%	<60%
Denver	2002	Mandatory	30	15 years	No	NA	10%	NA
San Francisco	2002	Mandatory	5	Perpetual	Yes--with 20% setaside	12%	12%	<=55%
Washington, DC	2007	Mandatory	11	Perpetual	Yes	Varies	Varies	<-50% & <=80%

Source: Program websites and Hickey, Sturtevant et al. 2014.

December 16, 2015

A Statement to NYC City Planning Commission:

I oppose the Mayor's city-wide rezoning proposal. Beyond the lack of evidence to suggest that the zoning will lead to more affordable housing (which has and will be argued many times this morning), I do not think we are ready for the implications this proposal will have for every day life.

I've lived in the Upper East Side, Morningside Heights, Hell's Kitchen, Park Slope, Greenwich Village and now Bed Stuy. Each community/neighborhood is different from the next, and that's what I love about this city. Each neighborhood has its own flavor rooted in and enabled by the mom & pop shops that have been there forever, the small business owners that know locals by name, operating despite pressure from chains, and the architecture around and within which these micro-cultures exist. There is no mistaking Park Slope for Greenwich Village - or at least there used to be no mistaking it.

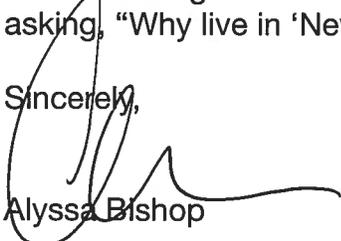
But recent trips back to my old neighborhoods have been disheartening. Entire blocks are gone, replaced with "luxury towers". Favorite restaurants, bars and stores closed and forced to move out due to rent hikes, while their spaces are left empty and waiting for a tenant who can afford the higher price. Once vibrant intersections now lifeless as small businesses are replaced with ATM vestibules. Chain stores across the street from chain stores. And everywhere, on nearly every block...scaffolding and green plywood signals of new development.

My biggest fear is that on top of the change that is already taking place, a city-wide rezoning will increase the rate at which these decisions are made. Site by site, block by block until we are left with a city that is bursting at the seams, but anything from vibrant. And far from a place I want or even could afford to call home.

I am here today because I could not allow myself to stay quiet. This proposal threatens me as a New Yorker and as an individual. It threatens my commute to work, my local shops' ability to stay in business, my neighbors who may be forced out of their homes, my friends who can't afford their rent, my ability to afford my rent and it threatens to turn everything that made my neighborhoods distinct and culturally rich into a sea of high rise gloss and chain stores.

And that brings me to one simple question that I, and a lot of New Yorkers will be asking, "Why live in 'New York' at all?"

Sincerely,


Alyssa Bishop

From: [Elizabeth Capelle](#)
To: [Affordable Housing Text \(DCP\)](#)
Subject: Re: MIH/ZQA Dec 16 CPC Public Hearing
Date: Wednesday, December 23, 2015 8:55:05 PM

This does not correspond to my experience, which was that shortly after 10 am (when I had been waiting in the cold for over an hour), an official-looking man in a suit with some kind of ID around his neck came along and informed me and the other people at my point in the line that the room was full and there was no telling when we might be admitted. He said nothing about signing us up to testify later, and I had no idea that this was routine at public hearings (it has not been the case at City Council hearings I have attended), and I wonder how many other people did. Perhaps your arcane procedures should be announced before the hearings, though I do wonder why, given the amount of interest the rezonings have aroused, you didn't hold the hearing at a larger venue that could accommodate the crowd (or schedule a second hearing for another day). To let people wait in line for a long time and then ask them to come back later shows a disrespect for the interested public. It is also not acceptable that the security procedures at the door were so inadequate to the number of people who wanted to attend that the line moved at a snail's pace.

You need to rethink how you manage these hearings.

From: Affordable Housing Text (DCP) <AHOUSING@planning.nyc.gov>
To: Affordable Housing Text (DCP) <AHOUSING@planning.nyc.gov>
Sent: Wednesday, December 23, 2015 5:55 PM
Subject: MIH/ZQA Dec 16 CPC Public Hearing

Thank you for your message regarding the December 16th public hearing on the MIH/ZQA text amendment proposals.

We had an incredible turnout, in which more than 110 people testified and hundreds more attended the 13+ hour hearing, lasting until the final speaker testified shortly after 10 PM. We were advised by museum security that the auditorium was temporarily at its 325-person capacity for a short while in the morning, mainly with those opposed to the text amendment proposal. DCP staff went outside to offer to sign up those waiting in line and provided them with assigned numbers and instructions to follow the progress throughout the day on social and mainstream media. A number of people signed up and returned later in the day, which is typical of public hearings where many people wish to speak. We, and other media partners, continued to post speaker numbers and that the hearing was ongoing on Twitter and the DCP website, and that it would remain ongoing until everyone who was present was able to speak. Every speaker who signed up to speak and was present was given an opportunity to testify.

For those who did not testify at the hearing and would like to submit written testimony at any time prior to the vote, written comments on the DEIS will be considered until Monday, December 28 and written comments on the application may be sent up to the date of the Commission vote. Written testimony is read, synthesized and addressed in the City Planning Commission report, reviewed in advance of the vote.

You can submit written comments by email to AHOUSING@planning.nyc.gov or mail to:

CITY PLANNING COMMISSION
Calendar Information Office - 31st Floor
120 Broadway, New York NY 10271

Elizabeth Ely
40 Fifth Avenue
New York, New York
10011

December 16, 2016

Dear Sir or Madam,

It has been years of negotiations to obtain landmark status in Greenwich Village and many other areas throughout the city. In these neighborhoods we have both small scale housing and apartment buildings. Many of us in this room live in neighborhoods with both high rise and small scale housing. The viability of these neighborhoods depend upon landmarking which has kept the balance between new and old construction and maintain the ambience which most New Yorkers value. After all, we choose to live here.

The towers that this administration proposes will not substantially change the amount of affordable housing available. After all, any developer can already choose to add affordable housing and get benefits from the city.

I agree with GVSHP "We want to change the zoning to impose reasonable height limits for new development, eliminate incentives for dorms and hotels, and add incentives (or requirements, if the City agreed) for including affordable housing."

The result of this administrations plan to allow for higher, out-of-scale buildings will be to destroy neighborhoods for questionable gains.

Thank you.

Elizabeth Ely

Testimony to the City Planning Commission in opposition to the “Zoning for Quality and Affordability Plan”.

My name is Ellen Osuna, I’ve lived in New York City all my life, except for a few misplaced years on the west coast. Although I lived in San Francisco, I feel like I never had a clue what San Francisco was before the tech boom and massive development that evicted so much of what had made it special.

But New York, I love this city.

I don’t claim to be an expert in this housing plan. I saw the online presentation. And I read some of the Community District Profiles. But, it all seems so sanitized ...it didn’t seem to say anything at all ... There has to be more than these dry simple lukewarm words, like “affordable”, “livable”, “encourage better”, “affordable senior”, “care”, “rationalize floor”, “increase flexibility”, “options”, “inclusionary housing”. I do agree that affordable is good – if it’s actually affordable. I also agree that we can do better than ugly, flat, boxy buildings. And in the beginning is something that sounds nice about collaborative neighborhood planning.

But, wait - Why do so many New Yorkers dislike this plan? Why do so many New Yorkers who know a great deal about housing, politics, and economic justice severely dislike this plan? Did the real estate industry have more collaboration in it than the people? Is affordable based on the median income of New York City and not the median income of the vastly different areas within this city? That alone is so backwards, that alone taints any mention of the overused word “affordable”.

I want to pause and acknowledge that figuring out the housing for over nine million human beings is a massive task. To any of you who may truly be trying to do the right thing, thank you. This can’t be easy. Sometimes, infusions of money are necessary. Sometimes, change is necessary. Sometimes, I believe, careful, mindful, strategic compromise is necessary. But sometimes, further compromise with a deck so stacked toward industry’s wishes, leaving a few crumbs for the people who struggle most, is just wrong. That’s what this feels like. This feels wrong.

Is all this opposition really just misinterpretations of something that truly has the best interests of regular people in mind? Does everyone need another read through of how “affordable”, “livable”, and “inclusionary” this plan would make our city, and should we just believe it as described? Or are there real questions here, as to who really benefits, as to what is being sacrificed? Could donations from the real estate industry have anything to do with this ultimately being about more options and increased flexibility for big developers? Could there be other ways to really generate affordable housing that are in honest collaboration with the people and community groups most affected?

There is massive hypocrisy here to be claiming to be protecting affordability, and to not listen to the voices of the movements for truly affordable housing as they say a resounding NO to this plan.

Since returning home last year from the west coast, I understood more deeply how important the soul of a place is. That doesn't have to mean never changing anything. People can move into neighborhoods with some care and respect for where they're entering into. Businesses can open that respect the area they're in and show that with their design, attitude, ethics, prices ... but all too often, development means prices grow by leaps and bounds. All too often, things that look soft on paper with relaxed regulations and rationalized floors end up becoming obnoxious retail storefronts or high end restaurants that drive up prices, and make everything look like Midtown or Times Square. Or the west side of Manhattan, near the Highline. Or what's become of Williamsburg. There's an ostentatiousness to what developers do when they get their way. An ostentatiousness that is not only ugly in view and feel, but it's more than ugly, it's tragic – because the disconnect, and disrespect, and loss, is so obvious. The way real estate deals are thought of, as if there's nothing at work, or at play as they say, here besides numbers. The higher numbers the better. Yet these are people's lives, people being evicted, harassed, working two and three jobs and still having to move. People who have children, who have roots in communities, tossed aside like last year's inventory in a store.

Ramming this plan through despite this opposition and many valid objections is not in integrity with the campaign promises of Mayor de Blasio. It is, however, in keeping with the spirit of colonization that decimated the American Indians. Another name for this place where this hearing is held today could be Museum of Cultures Violated By Greedy Development.

Thank you for listening, and please, oppose the misnamed "Zoning for Quality and Affordability Plan".

Sincerely,
Ellen Osuna
73-63 260th St
Glen Oaks, NY 11004

Good morning,

My name is Emily Kurtz. I am the Deputy Housing Director for the Ridgewood Bushwick Senior Citizens Council, Inc. I have worked with Angela Battaglia for 11.5 years. She has asked me to send you her warmest regards and her regrets that she could not be here personally to express her wholehearted support for these zoning text amendments.

I am very pleased to have the opportunity to testify before you today on behalf of the ZQA text amendment. While there are so many favorable components of this amendment, I will primarily focus my comments on site coverage and underutilized parking for senior buildings.

Our agency has developed or sponsored over 3000 units of affordable housing in Brooklyn, over 550 of which are dedicated to low income seniors. The seniors living in our buildings live in secure, well managed, and supportive environments. Each building has onsite service coordinators available to provide assistance with appointment scheduling, entitlement access and coordination, and many other challenges faced by our residents. Our residents enjoy a range of onsite social activities, such as oil painting, tai chi, and Zumba, and are also offered transportation to nearby senior centers. Best of all, each of our senior residents pays only 30% of their income towards rent thanks to project-based Section 8 contracts.

Every effort made to realize these projects (and it is quite an effort) is validated by the fact that they provide essential units of housing to a vulnerable population that is predicted to grow to unprecedented levels in the next two decades. ZQA can make the process easier by removing impediments to building to the highest and best use of any lot. For example, we have determined that under the ZQA amendment, a development in our pipeline would improve by a 20% increase in the number of housing units, in addition to creating a more inviting and flexible ground floor community facility space to accommodate a large Federally Qualified Health Center. This is achieved through a reduction in the required parking and adjustments to rear yard requirements on irregular lots. As the market for development sites continues to escalate citywide, the proposed amendments under ZQA are necessary to level the playing field so that affordable senior housing developers are able to continue to build critical apartments for our city's aging population

The parking lots at our senior buildings are severely underutilized, as they are restricted to residents and staff, and very few of our residents own cars. Should ZQA pass, we have identified 4 existing projects that could potentially support development of additional units of affordable senior housing. To think that the precious resource of buildable land is dedicated to underutilized parking lots in the neighborhoods that we serve and across the city is frustrating, especially to those of us who are routinely contacted by low income seniors or by their families desperate to find affordable housing. This is a daily occurrence, and it is heartbreaking.

Finally, I also endorse the Mandatory Inclusionary Housing text amendment, because too often in our neighborhoods we have seen vast private wealth conferred on landowners and developers through rezonings with little public benefit received in return.

I am thankful to the Mayor's office and the Department of City Planning for proposing both the Zoning for Quality and Affordability and the Mandatory Inclusionary Housing text amendments, and I fully support their implementation.

Thank you.

Fatima

Hello, my name is Fatima Fernandez. I am a single mom with three children, and I am a hotel worker.

As New York residents, housing is one of the biggest struggles for me and my family. I work very, ~~very~~ hard to make sure that my family has food on the table and clothes to wear. But other than basic needs, I need to make sure that we have a safe place to come home to every day. But for me and for so many other hospitality workers in New York, no matter how hard we work, finding good, safe housing can be very hard or impossible.

I have applied to get into more than 20 different affordable housing buildings. No matter how many times I tried, I never got accepted into those buildings. The big problem is that there just isn't enough affordable housing. And now with AirBnB taking away apartment units and all the changes happening to our city, this issue is more important than ever.

The mayor's plan for affordable housing gives me hope. There has been a lot of talk about this issue, but it's very good to see the city with a real plan that requires companies to build new affordable housing.

For me and my family, this means that we are going to see more and more new affordable housing apartments get built in our city. I want to thank Mayor DeBlasio and the city for bringing forward a real plan to increase the number of apartments available and affordable to hard-working New Yorkers and their families.



Selfhelp Community Services, Inc.
Selfhelp Innovative Senior Center
(Benjamin Rosenthal-Prince Street Senior Center)
45-25 Kissena Boulevard
Flushing, NY 11355
718.886.5777; 718.886.0423 –fax
www.selfhelp.net

Testimony by Indira Prasad, a member of Selfhelp Innovative Senior Center

Good Morning. My name is Indira Prasad. I am a member and a volunteer Yoga teacher at Selfhelp Innovative Senior Center, located in Flushing, Queens. I am here today to testify from my personal experiences on how difficult it is to obtain an affordable senior housing apartment. I live on a fixed income of \$776. I pay \$508 a month to live in a basement, which is dark and often cold. I am afraid to complain to my landlord because if she throws me out, where else will I go?

I initially placed an application with NYCHA in April of 2012. I did not hear anything from them. I went to the NYCHA office in Queens in April of 2015. I was told that I had to re-apply and then call or write every 6 months to say that I am still interested. I am told that NYCHA has no available housing right now and the waiting list is very long.

My Selfhelp social worker is planning to help me apply for Selfhelp's Section 8 housing when applications open up again in January 2016. At that point, if I am lucky, my name can be picked in the lottery. But there are many people waiting, so most of us will have to continue waiting.

I feel like my hopes and dreams have been shuttered over and over again due to the rejections and endless waiting. I was told by some elderly friends who are in a similar situation to mine, that they have waited for 10 years or longer for an opening with NYCHA. Other seniors have told me that it is a waste of time to apply and re-apply because by the time NYCHA has an apartment for you, you are either in a nursing home or have died. I am not in the worst case scenario. Some of my friends live in even worse conditions than I do. It looks like a hopeless situation for seniors like me who have no stable place to live or any support. However I still have to try since there isn't any other choice. Otherwise I will be homeless if the landlord decides to sell the house or evict me. I often question why I have to go through such a struggle and hardship after I have worked hard all my life.

I have proudly called America my country for the past 36 years, even though I cannot even live comfortably in my old age. We, senior citizens, deserve and demand better living conditions with affordable housing. Here, I am asking the City Council members and the Mayor to understand where and how we live, so that you can realize the current housing crisis we are facing. Please help us by building more affordable senior housing.



TESTIMONY OF KATHERINE SCHOONOVER BEFORE THE
CITY PLANNING COMMISSION ON DECEMBER 16, 2015

Good morning. My name is Katherine Schoonover, and I live on Washington Street in the Far West Village of Manhattan. I am speaking in opposition to the proposal known as Zoning for Quality and Affordability.

In my neighborhood, which has some parts within the Greenwich Village Historic District and some outside of it, development pressure is extreme. If it were not for the Landmarks law and contextual zoning, the area would have long since lost every shred of the charm and cohesive architectural character that have caused it to become vital to the City's tourist industry and a desirable place to live.

In 2005 and 2010, local residents fought very hard to get contextual rezonings in the Far West Village, which for the first time put in place height limits for new construction in the area. The height limits, which are at the heart of contextual zoning, have already been instrumental in requiring several ill-conceived, inappropriate projects to scale back their plans. But if ZQA is enacted, those height limits would be lifted, weakening the protections we fought so hard to secure. The height limits that were enacted via contextual zoning were already not quite as strong as those that were originally proposed by neighborhood advocates. They were compromises at best, though significantly better than the prior zoning for the area, which had no height limits whatsoever for new development. We need stronger, not weaker, zoning protections to help ensure that new development in our neighborhood is not out-of-scale and out-of-character, as too much of it already is.

Further, as the Greenwich Village Society for Historic Preservation has amply demonstrated, ZQA is not designed to actually achieve the development of more affordable housing. It is a giveaway to big real estate developers and reflects very badly on the Mayor and the City Planning Commission. And the fact that it will increase height limits across the board for every existing zoning district, including contextual zones, rather than simply creating new zoning designations that could be applied on a case-by-case basis as rezonings in appropriate situations, is truly pulling the rug out from under every part of the City.

If ZQA is enacted, it will stand as a testament not to the Mayor's determination to ensure an ample supply of affordable housing for middle class and poorer New Yorkers, but as a testament to his self-out to the powers that be, the powers that fund election campaigns, or just as bad, as a testament to how he allowed the values he believes in to be perverted to allow the wealthiest among us to make even greater profits from in New York City real estate at the expense of every other New Yorker.

Respectfully submitted,

Katherine Schoonover
749 Washington St.
New York, NY 10014-2042

Dara Goldberg (DCP)

From: martica sawin <m.sawin@mail178-15.suw51.mandrillapp.com> on behalf of martica sawin <m.sawin@verizon.net>
Sent: Thursday, December 17, 2015 11:15 AM
To: Carl Weisbrod (DCP)
Subject: Requesting 2nd Public Hearing on ZQA/MIH--Public Was Turned Away

Dear Carl Weisbrod,

I am one of hundreds that your agency, the City Planning Commission, turned away this morning at the only public hearing for ZQA/MIH. It is critical that the public have a voice in this process. Blocking access to a public hearing is alarming public policy and issues of this magnitude need to engage the broadest band of the public, not just people who arrived early.

The failure of your agency to anticipate a large turnout for the most crucial rezoning proposals of our City (ZQA & MIH) was short-sighted, and not accommodating the profound public interest in this issue is opaque, undemocratic, and violates the spirit and intention of the Uniform Land Use Review Process.

I respectfully request that a second public hearing be held for everyone who was left in the cold today. Allow us to speak, the same way certain groups were able to speak to your Commissioners this morning. Submitting written statements is not equivalent to face time with your Commission on this enormous citywide proposal.

Sincerely,
martica sawin
61 Jane St Apt 4P
New York, NY 10014-5150

**68 Lispenard Street/411 Broadway
City Planning Commission Public Hearing Testimony
December 16, 2015**

Good morning. I am Meredith Katz and am here today on behalf of 411-413 Broadway, LLC, a family-owned parking business and the owner of the property located at 411 Broadway in Manhattan. We wish to express our support for the proposed Zoning for Quality and Affordability text amendment, and in particular the proposed modification that would increase the maximum lot coverage on corner lots to 100% in certain zoning districts.

Our late father took a second mortgage on our family's home to be able to buy this vacant property in the early 1970s because he had a vision and a dream. His vision was that ^{Tribeca, which} ~~this area of Manhattan~~ ^a that was then dark and desolate manufacturing zone, would one day be a vibrant residential neighborhood. His dream was to take this vacant parcel and build a residential rental building on it so that ^{New Yorkers} young people could live and contribute to that neighborhood. ^{*} My brother, sister and I ^{are finally in} want to ^{a positive} realize our late father's dream of building a rental building, but ironically if the proposed amendment is not adopted, the existing zoning, which does not impose a lot coverage restriction on commercial buildings, such as hotels, will force us to do something neither we nor the local community wants: build yet another boutique

hotel and make Tribeca welcome to tourists even as it says no to real New Yorkers who want to rent and live here.

X Our property is located at the corner of Broadway and Lispenard Street, in a C6-2A zoning district and in the Special Tribeca Mixed-Use District. It is also located in the Tribeca East Historic District. Since the early 1970s we have operated this vacant land as a public parking lot, but more than 45 years after we purchased it and almost 30 years since our late father's passing, we are finally in a position to build a rental apartment building here. The zoning regulations applicable to our site allow over 40,000 square feet of new residential floor area.

So what's the ^{zoning} problem? Over the years we have met with various architects well known for their work in Tribeca and SoHo, to design a residential rental building for the site. Throughout this process we have run into the same obstacle over and over: Our property is irregular in shape and has narrow dimensions, making it virtually impossible to design a residential building that complies with the maximum lot coverage of 80%, while providing reasonable residential floor plates and fitting in with the historic context. We have gone to the drawing board multiple times and have yet to find a feasible, as-of-right residential rental building development that the Landmarks Preservation Commission would approve. Over and over again we have been advised that instead of a residential rental building

styled to fit in with the loft context of the neighborhood, we should instead build a boutique hotel, which the current zoning favors by NOT limiting the lot coverage to 80%.

The proposal to increase the maximum lot coverage on corner lots to 100% would remedy this perverse incentive. Its adoption would ensure that we can continue with our plans to develop an as-of-right residential rental building, while its rejection will send a clear message to us that the City favors hotel development over residential rental, which while lucrative, is not what we or the community around us wants.

I hope that our experience serves as an example of the types of properties for which the current residential bulk regulations are poorly suited, and the positive impact that the proposed ZQA amendment can have on residential development in this City.

Norman Frazier

New York Communities for Change

My name is Norman Frazier. I am a member of New York Communities for Change and the Real Affordability for All Coalition. As a resident and Community Board member of Brownsville, I voted against MIH because it does nothing to create housing that is affordable for me and my neighbors. Brownsville and East NY make an average of \$33,000 a year, far below MIH's \$53,000 a year for a family of 4. It is a giveaway to developers to kick us out of our community. With high unemployment, we need to attack local hire and job standards. I ask the commission to vote no on MIH unless they adopt ~~the~~ RAFA's Real Affordable Communities Plan.



Testimony by Pawn Pongsangthong

Selfhelp Housing Social Services Program

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*A not-for-profit, tax-exempt
social service organization
founded in 1936*

a beneficiary of
UJA Federation
of New York



Good morning, my name is Pawn Pongsangthong. I am 77 years old and live in Selfhelp's Scheuer House of Flushing with my 99 year old mother for the past 7 years. I am here today to tell you my story about living in an affordable senior apartment.

Before living at Scheuer House of Flushing, I lived with my mother in Elmhurst in a private apartment complex. The reason I wanted to move is because the rent kept increasing. Also the place where I lived, I did not feel safe especially for my aging mother. One day I heard a gunshot, which I thought was the TV but later the police came to my apartment and asked if I heard anything. This is when I decided it was time to move.

I tried to find another place to live with private apartments but my income was not enough and two places rejected me. A friend of mine told me about Selfhelp housing because her mother lived there and said it was very nice. I applied and waited for 3 years before I was accepted. Since living in Scheuer House of Flushing, I found it very beneficial for my mother and myself. I feel very safe living in senior housing. There is a security guard at night, there are emergency pull chords in the apartments in case we fall, and in the hallways there are railings. When the weather is bad I walk in the hallways to keep my knees from going stiff.

I am able to be the caregiver to my mother living in senior housing. I am able to participate in activities within the building and not have to worry if I will be able to get home in time to care for my mother. If anything should happen to her, her homecare aide will give me a call and I will be home in less than 5 mins. I am very active on the tenant council; I enjoy the social, mental, and physical activities that are provided within senior housing. I am young and feel that living in a safe Housing with all the different services will help me stay healthy and in the community.

I feel it is very important for this city to have affordable housing for all seniors. My mother and I are very lucky to live in Scheuer House of Flushing.



Testimony by Rosa Mae Borrow

Selfhelp Housing Social Services Program

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Fax 718.353.6250

*A not-for-profit, tax-exempt
social service organization
founded in 1936*

Good morning, my name is Rosa Mae Borrow. I am 87 years old living in Scheuer House of Flushing. I am here to tell you my story and why I feel that affordable senior housing is very important.

I first lived in Martin Lande House, Selfhelp's senior housing, back in 1993 with my husband. We moved there because my husband was aging and we used to live in a townhouse that had 3 flights of stairs in Corona. It was becoming very difficult for him to move about. Martin Lande had elevators and security. That was very important to us. We had a great time living in Martin Lande House. We enjoyed the community and the activities that were provided for us. I was very active as a tenant council and volunteer. My husband and I truly enjoyed our friends and neighbors because all of them were so nice. With the passing of my husband in 1998, I felt comforted by my neighbors and because of the activities and committees I was on in Martin Lande, I was able to grieve for my husband in more positive way. After 19 years of living there, I moved to Maryland because of my mother. She needed help so I moved there to be with her since I was alone at this time.

Maryland was a different place. It was too quiet and I missed my friends. I was also aging so after a few years living in Maryland, I decided to move back to NYC. I applied back to Selfhelp housing and waited for an apartment. I was very lucky that an apartment was available after 2 years of waiting but it wasn't back at Martin Lande, it was at Scheuer Housing of Flushing. It didn't matter because it was still the community I was going back to. I still see my old friends and I truly believe that we seniors need to have a place where we feel safe and that there are services that are provided to us. It helps us in our daily lives to be active whether it is mentally or physically, living in Scheuer House of Flushing has given that to me.

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UJA Federation
of New York



Stanley Marte

Hello, my name is Stanley Marte and I am a proud member of the Hotel Trades Council. I have worked in hospitality here in New York City for [X YEARS]. This city is my home, and home to my [~~SPOUSE, CHILDREN, ETC.~~].

↳ spouse & children.

I grew up in Williamsburg, Brooklyn. When I grew up, my neighborhood was not safe. As a kid, I remember my mother being worried when I would go to play in the park. And now that the neighborhood is safe, the friends and family that I grew up with can't afford to stay there.

I, along with my union brothers and sisters, am a big fan of Mayor DeBlasio's affordable housing plan. Not only does this plan require developers to build affordable housing, but it also provides subsidies to bring down the cost of housing. That means more middle-class families, like mine, are going to be able to keep calling New York home for a long time.

Hotel workers are the ones who make New York hospitable to tourists, which brings a lot of money into our city. The mayor's plan makes sure that workers like us can afford to live here, which is good for the whole city. Thank you.

Comments of Suwen Cheong

I am a resident of Prospect Lefferts Gardens in Brooklyn, community District 9. I am a member of Concerned Citizens For Community Based Planning, a grassroots organization that was formed because a legacy of unfair zoning and poor planning has left our essentially low rise, historic neighborhood open to destructive real estate speculation, out of scale buildings that do violence to the character of our neighborhood, undue concentrations of population, congestion, and the demolition of perfectly sound, moderately priced housing in favor of luxury condos.

Our neighborhood is already one of the densest in Brooklyn with 60,536 residents per square mile (2010), and is set to become even more dense for decades to come. Unlike Park Slope, we do not expect a significant reduction in population through gentrification. Ninety percent of our housing units consist of rent stabilized apartments, rather than townhouses. At this point, greater density of either buildings or population is a burden, not a benefit, to the public.

In view of community goals to preserve neighborhood character and quality of life by limiting height and further density, and in view of the repeated failures of city planning to implement zoning to protect our neighborhood at the request of our community board since 2008, we cannot support legislation such as the Zoning for Quality and Affordability and Mandatory Inclusionary Housing Amendments that would move in the opposite direction of what we seek by approving broad increases in height and density.

My neighbors do not want violent change. What does that mean? Our streetscapes are sometimes uniform and sometimes varied between 3 and 6 stories tall. Allowing and incentivizing buildings double the height of nearby buildings is felt as a violent change, so is the quite literal violence of demolition and construction adjacent to one hundred year old buildings. Change used to mean a homeowner adding an extension to the back of their house to accommodate a growing family, or a landlord adding one floor to a commercial building when the business was successful enough to warrant expansion. We are furious about the changes we are seeing today – 20 story publicly subsidized mostly luxury towers next to 2 story houses, and block wide 8 story buildings that sit vacant for years while nearby rent stabilized buildings are emptied with alarming speed. We are also concerned by a trend of violent confrontations over parking spaces as our last remaining parking lots and garages are replaced by residential buildings that make no contribution to affordability, aesthetics, or property taxes. We believe we have the right to remain a stable neighborhood, with progress defined as each generation doing better than the last in access to good jobs and educational opportunities.

We believe a policy of increasing market rate density to subsidize a small number of income linked units is not appropriate in our neighborhood, given community goals to curb overdevelopment and speculation and preserve our large stock of existing rent stabilized housing. We are deeply concerned that given the existing need for rightzoning, a higher density mandatory inclusionary zone would contribute to the destruction of neighborhood character and existing affordable housing, and cause secondary displacement of lower income residents. Instead we seek to preserve our existing affordable housing and create new affordable housing on a site specific basis, where appropriate.

In Community District 9, in the last five years we have built several hundred units of housing that is affordable to our residents (whose median income is around \$40,000 per household). This was done without inclusionary zoning or out of scale construction. A local non-profit, CAMBA, is building approximately 500 units of housing on the site of an existing 7 story Kings County hospital building. We support our community board in seeking more similar opportunities.

Ursula Hernandez

Hello, my name is Ursula Hernandez , and I work as a PBX Operator at the Grand Hyatt. I want to thank Mayor DeBlasio and the City Planning Commission for bringing forward this plan to make New York affordable for New Yorkers.

I live in Bed Stuy, Brooklyn. It seems like every day, there are new buildings going up all around us. My neighbors and I have inquired on how to apply to these new apartments and no one has gotten back to us, so what that says to me is that these new apartments are not for me or my neighbors.

What's really great about the mayor's plan is that it includes Mandatory Inclusionary Housing. That means these big developers have to include affordable housing as part of their projects, which is a really great way to make sure that we don't get left behind as more apartments get built.

As a hospitality worker, I'm proud to take care of guests who visit our city, but I need to know that my future in New York is secure. This is the first time I have seen the city present a plan to take care of that. Thank you.

December 16, 2016

For More Affordable Housing:

I'm very concerned about the Black Economy, It seems to be non-existent within New York anymore. There are very little Affordable New Housing IN Harlem. The 125th Street area IS non Harlem orientated, where there IS more Hispanic areas that still exist. They seem to control most of the Affordable Housing Areas.

Where Harlem was mostly black, the Co Op's are consuming the areas IN Harlem. Now we know there IS not enough funds IN Black people to afford such.

As well I know some buildings have rooms for only Disability. What happen to Just Affordable.

Thanks

Vickie Carter
784 Fox Street 5G
Bronx NY 10455



DUVAL & STACHENFELD LLP

OFFICE OF THE
CHAIRPERSON

DEC 21 2015

29162

ROBIN KRAMER
DIRECT DIAL: 212-692-5554
rkramer@dslip.com

December 17, 2015

City Planning Commission Calendar Office
120 Broadway, 31st floor
New York, NY 10271

Re: Zoning for Quality and Affordability, N 160049 ZRY,
Calendar No. 23, December 16, 2015.

Dear Chairman Weisbrod and Members of the Planning Commission:

I'm sorry that I was unable to stay and present my testimony at the hearing on Wednesday (I was number 174), but attached please find a copy of my statement in support of Zoning for Quality and Affordability.

Thank you for this opportunity to share my thoughts with you and for your clearly careful consideration of the subject.

Sincerely yours,

Robin A. Kramer

Good afternoon Chairman Weisbrod and Commissioners.

My name is Robin Kramer. I am a land use attorney and partner at Duval & Stachenfeld. I am here to express my support for the proposed Zoning for Quality and Affordability.

I started practicing land use law many years ago, during the Koch administration, as an Assistant Counsel at the Department of City Planning. In the Counsel's office, my responsibilities included drafting amendments to the Zoning Resolution, including the original Article I, Chapter 5. As a lawyer in the private sector, I have drafted other provisions of the Zoning Resolution in connection with particular projects that my clients have developed. In all of these cases, zoning text is drafted only after review by many lawyers and planners and an analysis and consideration of what that text will do. But no matter how many people read a proposed text or the detailed architectural studies that are prepared to show what a building will look like, the text often cannot account for the variety of sites that it may be applied to or for changes over time.

Zoning must adapt and adjust to reflect the changing needs of a city, new and different planning goals, and other advances and diversification in development techniques and technology. When the loft zoning text was drafted, it was intended to address a situation that existed in Manhattan in the early 1980s and imposed numerous restrictions on the conversion of non-residential use. As manufacturing use in Manhattan has declined, many of these provisions became unnecessary or too restrictive and have been eliminated. Before we had quality housing we had Housing Quality. Similarly, as many of the members of the Commission have seen, follow up corrective actions texts following a significant text change are often necessary to address the unexpected or unconsidered.

In 1987, when Quality Housing was adopted, the City Planning Commission noted that one of the reasons for the decline in residential development was the 1961 height factor zoning, and said:

Medium and high density zoning districts in the 1961 zoning regulations were designed to complement government sponsored land assemblage programs which produced the large sites needed to build efficient apartment houses. The use of government assisted assemblage and clearance has declined in the past 15 years because it has been both expensive and often disruptive to neighborhoods. Consequently, few appropriately zoned sites are available to make efficient use of the 1961 bulk regulations . . . (Cal. Nos. N 870197(A) ZRY and N 870385(A) ZRY)

Just as Quality Housing and contextual zoning were drafted to respond to concerns in 1987, Zoning for Quality and Affordability is in an attempt to respond to concerns in 2015 and to better reflect and adjust for modern development. I have read the entire draft text, and

while I can't say that I agree with every single change, on the whole, I think that it is a very good and necessary amendment of the Zoning Resolution to reflect real problems and real needs.

When contextual zoning was first adopted in the 1980s – and as it has continued – it assumed certain construction techniques and development patterns, such as ceiling heights of 8 feet, and other conditions that are no longer prevalent. Modern buildings use construction techniques that were not anticipated. Moreover, the past 30 years have allowed us to see how contextual zoning works in practice and there have been many unforeseen issues. The street wall regulations enforce a street wall without variety and texture; full utilization of space in a building in an R district without a commercial overlay means that apartments are constructed at street level; the regulations are designed for standard lots and do not allow full development of the permitted FAR on many narrow or irregular lots. I had a client in Brooklyn in an inclusionary housing designated district who built at the base FAR, in large part because it could not easily accommodate the extra FAR in the building envelope.

Charles Darwin said: “It is not the strongest of the species that survive, not the most intelligent, but the one most responsive to change.” As we approach the 100th anniversary of zoning in New York City, we must remember that as a city grows and changes and as technology changes, the zoning provisions must respond to these changes. Zoning for Quality and Affordability is a very important tool to modernize and more effectively accommodate and support appropriate development.

December 16, 2015

OFFICE OF THE
CHAIRPERSON

DEC 22 2015

20233

Carl Weisbrod, Chair
City Planning Commission
120 Broadway 31st Floor
New York, New York 10271

Re: "Zoning for Quality and Affordability" and the "Mandatory Inclusionary Housing"

Dear Chairman Weisbrod:

As past Civic President of the Queens Colony Civic Association, I oppose Mayor de Blasio's two proposals to increase the number of affordable housing units and senior housing units to be constructed in our city. Our Civic Association has fought long and hard for zoning regulations to protect the low-rise character of our neighborhood. We do not want to become a high density neighborhood, full of people and crowds. Long time and new homeowners purchased their homes here specifically because they wanted the quality of life one finds in one family neighborhoods with the ability to park in front of our homes, have a private backyard and basically to get away from high density living.

This plan would wipe out low density neighborhoods and damage the character and texture of unique neighborhoods. One size does not fit all! Only one third of Queens has subway service meaning many residents rely on cars and parking. The typical homeowner in our neighborhood has at least two or 3 cars with only one spot in front of our home to park. To eliminate parking requirements for senior housing is ridiculous as seniors age they continue to drive past their '80's. Queens schools are already overcrowded and adding density living would put our schools in even greater crisis as well as our sewer system and sanitation services.

No Mayor or City council should have the power to reshape how we choose to live in this city with a stroke of the pen. Maybe in Russia this type of action is forced upon its populace but not here in America. The Mayor's Zoning Plan should be withdrawn and reevaluated.

Sincerely,

Virginia Salow

Virginia Salow
88-27 247th St.
Bellerose, New York 11426
718-347-0389

c: Mayor de Blasio
Speaker Melissa Mark Viverito
Councilman Barry Grodenchek

Angela Augugliaro, Pres., Queens Colony Civic Assoc.

From: Barak.Wrobel@hklaw.com
To: [Affordable Housing Text \(DCP\)](#)
Subject: ZQA text
Date: Thursday, October 15, 2015 12:32:14 PM
Attachments: [ZQA_extended_project_description.pdf](#)

Hi,

In reviewing the ZQA text a slight ambiguity has arisen with respect to streetwall line up requirements that I wanted to bring to your attention, in case it seems fit to be addressed in the final version of the text.

I read newly proposed 23-661(a) [replacing 23-633(a)] to mean that street wall line up will only be required under the new text (if adopted) with respect to existing buildings that are directly adjacent (although the text omits the word “directly”). This reading of the text appears to be supported by the Expanded Project Description (attached) discussion of street walls line-up provisions (page 11, second paragraph), which does use the word “directly”.

That said, I have spoken to others that believe (and their interpretation seems valid) that newly proposed 23-661(a) does not limit street wall line up solely to adjoining/connected buildings for the following reason:

The ZR contains a definition for the term “abut” or “abutting”, which refers to abutting buildings as “building that are in contact with one another”, however, does not provide a definition for the term “adjacent”. This seems to imply the word “adjacent”, as set forth in the “B” district regulations and the proposed text, is not solely limited to adjoining/connected buildings (and would otherwise also apply to the nearest adjacent building anywhere on the street frontage), for if the intent was to limit streetwall line up requirements to directly/adjoining building the word “abutting” would have been chosen instead of the word “adjacent”.

Accordingly, can you confirm that the intent of proposed 23-661(a) is to only require streetwall line up where the existing adjacent building is actually connected and/or adjoining? If so, perhaps the text can be further revised before final adoption to eliminate this ambiguity by adding the word “directly” or replacing “adjacent” with “abutting”?

Regards,
Barak

Barak Wrobel | Holland & Knight

Associate

Holland & Knight LLP

31 West 52nd Street | New York, NY 10019

Phone 212.513.3348 | Fax 212.385.9010

barak.wrobel@hklaw.com | www.hklaw.com

[Add to address book](#) | [View professional biography](#)

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From: [John Sore](#)
To: [Affordable Housing Text \(DCP\)](#)
Subject: Status of - Zoning Changes for Quality and Affordability
Date: Thursday, December 24, 2015 11:28:44 AM

DCP:

After the hearings that were held on 12/16, please let me know the status of the proposal and when you anticipate the City Council vote.

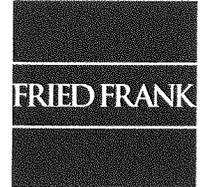
My firm has several sites that would be affected.

Thank you and Happy Holidays.

John

John R Sore - Project Manager - Shalimar Management - 422 East 89th St; New York, NY 10128 - 212-534-3939 Ext 23 - 917-805-1798

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Melanie.meyers@friedfrank.com

December 16, 2015

By Hand and Email

Honorable Carl Weisbrod, Chair
Members, New York City Planning Commission
120 Broadway, 31st Floor
New York, New York 10271

Re: Zoning for Quality and Affordability and Mandatory Inclusionary Housing
Items N 160049ZRY and N 160051ZRY

Dear Chair Weisbrod and Commissioners:

Thank you for holding the hearing on the Administration's proposals for improving the quality of New York City's housing stock and promoting housing for all New Yorkers including affordable housing. Together, the zoning texts will be the centerpiece of the Mayor's housing agenda and will be difficult to change in the future; as such it is critical that the texts are adopted in a form that ensures the promotion of quality housing at all levels of affordability and does not act as yet another bar to the development of the type of affordable housing that the City hopes to achieve.

With the City's goals - and the absolute importance of adopting the right program the first time - in mind, two of the components of the proposed Zoning for Quality and Affordability text are essential to encouraging quality affordable housing and are necessary precursors to the companion Mandatory Inclusionary Housing text; namely (i) the elimination of parking for low income units and the (ii) proposed adjustments in building heights.

Modification of Heights. The need for the modification to heights is simple: the minor adjustments being proposed allow the affordable floor area to be built and fit within the zoning envelope without producing substandard units or unwelcoming streetscapes. It is a given that any developer will look to maximize the amount of floor area within its building to maximize return, and will adjust floor to ceiling heights in residences and ground floor retail in order to maximize the amount of floor area that can be sold or rented. By allowing for a small addition of height that will be virtually imperceptible from the street and at the same time limiting the number of floors in a building and promoting superior ground floor treatments for buildings, the height adjustment proposal trades off a *de minimis* change to the

skyline of a building for a vibrant streetscape at grade and a more gracious living space for the residents – including the affordable residents - within the building. This is a benefit to all.

Parking. Proposed amendments to Sections 25-25 and 36-35 of the Zoning Resolution proposed as part of the ZQA text would eliminate the parking requirement for “Income-Restricted Housing Units” (as such term is defined in the ZQA) in areas well served by mass transit. The proposed change is necessary to promote affordable housing in absence of extensive City subsidies. In the best of circumstances *each* parking space costs on the lines of \$40,000 to \$50,000 to build, and can cost twice that amount based on site conditions. This cost can often be the margin between a viable affordable project and an uneconomic one, and needs to be eliminated to achieve the Administration’s affordable housing goals. Because of this reality, many City-sponsored affordable projects on City land have already been developed without accessory parking without adverse results. Similarly, zoning controls for Downtown Brooklyn have eliminated parking requirements for affordable units and have not caused parking shortfalls in the area even in the face of extensive residential growth. The proposed changes Sections 25-25 and 36-35 would extend this established, successful, practice to other areas with good access to mass transit and are essential modifications.

I recommend that one clarification to proposed ZR Section 25-251, and the comparable commercial section, be considered. The second paragraph states that parking is not required for income restricted housing units “developed after (date of enactment),” but it is not clear what “development” means in this context and in particular whether the text would apply to buildings that are under construction, but which have not yet received certificates of occupancy for the affordable units. In order to avoid uncertainty at the Building Department, I would recommend that the text be revised to make it clear that that new text would be apply to any “Income Restricted Housing Unit receiving a certificate of occupancy after the (date of enactment)”.

Open Space Controls. In addition to the core items noted above, I would recommend two changes be added to the ZQA text to facilitate outdoor space in light of recent Department of Building interpretations that have retreated from more flexible interpretations granted in the past. The provisions discussed below should be amended to facilitate the efficient creation of housing with common outdoor space for the use and enjoyment of residents.

a. ZR Section 15-12 – Open Space Equivalent for Residential Conversions. As the Commission knows, Article 15-12 of the Zoning Resolution requires that a percentage of the “gross roof area” of a pre-1961 commercial building be preserved as common open space in connection with its conversion to residential use. The term “gross roof area” is not defined in the Zoning Resolution and the Department of Buildings has taken various approaches in the past in calculating gross roof area, including discounting sloped roof areas and areas occupied by mechanical bulkheads and the like. More recently, DOB has adopted a stricter interpretation and requires all roof areas, including non-accessible roof areas and sloped roofs, to be included in the calculations. This more recent approach acts as a severe restraint on residential development and requires City Planning to spend valuable time processing meaningless applications for rooftop waivers. This restraint on residential development could be easily addressed by adding clarifying language to Zoning Resolution Section 15-12 to make it clear that “gross roof area” means the flat, occupiable roof areas of a building. This would align the text with earlier Department of Buildings interpretations, would continue to produce rooftop common space, would facilitate residential housing, and would save Department of City Planning staff valuable time.

b. Rooftop Terraces. In addition, I recommend that further revisions to the treatment of terraces in the definition of “floor area.” The Department of Buildings has recently concluded that the roof within a court area qualifies as a “terrace” if improved as a common tenant amenity, and the space within it would count as floor area because it is surrounded by walls. If however the space is closed off to

tenants, it would not be considered a terrace and would not count as floor area. These conclusions have the effect of forcing developers to choose between providing a tenant amenity and losing floor area, and I expect in almost all cases the decision will be to eliminate the amenity. This is a patently bad result, and one that can be remedied by adding a few additional words to the amendments to the treatment of terraces in the floor area definition in Section 12-10 already being proposed as part of the ZAQ text, as follows:

(n) floor space in exterior balconies or in open or roofed terraces, other than terraces used as a common open space or amenity for the occupants of a development, if more than 67 percent of the perimeter of such balcony or terrace is enclosed and provided that a parapet not higher than 3 feet, 8 inches, or a railing not less than 50 percent open and not higher than 4 feet, 6 inches, shall not constitute an enclosure. . . .

(10) floor space in exterior balconies or in open or roofed terraces provided that not more than 67 percent of the perimeter of such balcony or terrace is enclosed, provided that a terrace used as a common open space or amenity for the occupants of a development may be fully enclosed by walls and provided further that a parapet not higher than 3 feet, 8 inches, or a railing not less than 50 percent open and not higher than 4 feet, 6 inches, shall not constitute an enclosure.

Vesting. Finally, the Commission must consider adding a zoning provision allowing for projects that have received either zoning approval in the form of a posted ZD1 or foundation permits from the Department of Buildings the option of proceeding under the controls in effect prior to the adoption of the ZQA text. The text contains a host of detailed provisions that revise the underlying zoning text in a variety of ways which, while they may provide for additional flexibility in one way can impose requirements in another way that are inconsistent with current controls. An example of this is the proposed changes to street wall continuity controls, which, while allowing for more articulation within a street wall also impose street wall requirements in more areas than under existing controls.

There are host of projects working their way through the Department of Buildings that will not meet the vesting requirements under Zoning Resolution Section 11-30 and will be caught between the requirements of the existing controls and those proposed under ZQA. The Commission should anticipate this significant issue and incorporate text that will give these projects the option to proceed under the prior text or an additional period of time to vest under Section 11-30.

Thank you for your consideration of this testimony. I'd be pleased to answer any questions you might have on these comments and recommendations.

Sincerely,



Melanie Meyers

Cc: Anita Laremont, Esq.
Frank Ruchala
Howard Slatkin

Laura Smith (DCP)

From: carol karasek <ckarasek@googlemail.com>
Sent: Monday, December 21, 2015 7:17 PM
To: Affordable Housing Text (DCP); lowensohn@mitchellgiurgola.com
Subject: Revisions to NYC Zoning Resolution

As a working professional with 41 years of working in New York City, for both affordable housing projects, and not-for-profit service institutions, I have seen the New York City Zoning Resolution (which I opened the first time, while a graduate student at Columbia University, 'in the City of New York' in 1975) revised for the better---- creating both Special Districts, and Landmarks overlays, which have had the effect of slowing the cycle of development in established neighborhoods, and permitting new development in changing neighborhoods.

Having reviewed the current potential revision, which I DO NOT SUPPORT, it appears to me that this revision will roll back much (or all) of this good work, to stabilize successful residential zones, and will not address the potential for residential development in under-developed districts.

The Planning Commission should direct its efforts and expertise to expanding public transportation, to accelerate the building of affordable housing. This expansion may in fact be an analysis of the switching and traffic loading on certain lines, as well as laying new track, and creating new stations, in MANY places in Brooklyn and Queens.

Honestly, I was appalled by the content of this potential revision to the Zoning Resolution; it makes profit-taking easy for existing developers, and does not bring new, smaller development teams into the market. And, it makes existing, stable neighborhoods vulnerable to this profit-taking.

Carol Karasek AIA

Laura Smith (DCP)

From: jaysorid@aol.com
Sent: Monday, December 28, 2015 11:59 PM
To: Affordable Housing Text (DCP); jaysorid@aol.com
Subject: ZQA - N160049 - Notice of Objections and Request for Certification to Deny Application
Attachments: DCP.pdf

To the Members of the City Planning Commission:

I object to the current application, Zoning for Quality and Affordability a/k/a "ZQA", Land Use # N160049, based upon the following :

- 1) CEQRA 232.1 - Notice of the Public Scoping Meeting - Community Board 9 in Brooklyn did not receive a notice of public scoping for the instant application and the public was denied an opportunity for scoping. Citizen participation was denied. As this is an Environmental Impact Area, environmental justice requirements were not followed. I personally reviewed the ZQA file and there was no public scoping notice. I was with a witness at the time.
- 2) CEQRA 232.1 - Notice of Public Scoping Meeting - A motion was made by the CB 9 ULURP committee for further study recently and has been prejudiced to be properly noticed of said scoping meeting.
- 3) CEQRA 130 - SEGMENTATION - ZQA (N160049) was segmented from two other actions, Mandatory Inclusionary Housing (N160051) a/k/a "MIH", as well as Vision Zero actions.

Before going through the eight questions recommended by the CEQRA Technical Manual, I wish to focus on the correct standard of scrutiny and public disclosure and information.\

I am sure the members of the commission are familiar with the "hard look" that must be taken. I wish to focus that in addition to Citizen Participation, ENVIRONMENTAL JUSTICE requires more studies, information and disclosure in minority or low income neighborhoods.

I submit that level of scrutiny regarding segmentation is higher from the possible environmental impacts from two or more separate projects.

I answer the following in the sequence of the segmentation questions which I attach as Exhibit A for your convenience.

1. Both land use actions, ZQA and MIH have a common purpose and goal of increased density and increased affordable housing.
2. Increased density and affordable housing are the common reasons each action is being completed at the same time.
3. There is a common geographic region for both ZQA and MIH; citywide applicability.
4. The activities of both actions contribute toward significant cumulative or synergistic impacts. As is stated in # 7 below, ZQA can effect MIH and produce synergetic impacts.
ZQA's loosened parking requirements in the transit zone help MIH achieve the increased density which can occur through MIH's various provisions. (See MIH 23-96 reducing minimum size for senior units, and for affordable units by HPD waiver. Also see MIH 23-952 through Section 23-664 for increased height.) But you will never get the height unless you have ZQA's loosened parking and other zoning regs.
5. Both actions, ZQA & MIH, are under the control and direction of City Planning Commission, through the Department of City Planning as lead agency.
6. Both actions are part of an identifiable plan, which is to provide an additional 200,000 affordable units in the next ten years.
7. The interrelated phases of various projects appear to be independent, but are not functionally independent.
Without ZQA's changes in its many zoning regulation changes (for example reduced parking requirements in transit zones), MIH will never be able to produce buildings up to

130 feet tall as MIH 23-952 aspires. MIH provisions aspires for increased density, as in MIH 23-96 (d), where minimum unit size can be waived by HPD for affordable units, or where affordable senior citizen units have no minimum size. However, MIH functionally needs ZQA's loosened transit zone parking requirements to functionally achieve its purpose in increasing density.

8 The approval of ZQA does not require MIH, but MIH functionally needs ZQA to be effective. The first page of the Proposed Mandatory Housing Zoning Text references ZQA in cross references and overlap. I have circled those overlapping provisions in the land use publications on LUCATS.

In addition to ZQA and MIH being segmented, the new transportation initiative VISION ZERO, is related and increases pedestrian walkways and decreased roadway which has a negative impact on traffic. Further traffic study is necessary and should be mandated by CEQRA, SEQRA, NEPA and ULURP. City Planning's own drafts indicate that when you change the City Map's roadway and pedestrian space, you must initiate a Map Change as per charter.

4) LACK OF FEDERAL ENVIRONMENTALS & FONSI - ZQA & MIH have failed according to NEPA to provide federal environmental and federal community block grants are involved in these applications for affordable housing and supportive housing (federal funds to NYS to HCR and OMH for local projects). LIHTC (Low Income Housing Tax Credits Are also involved).

5) NYS Objectives -Reducing unit size in senior housing units is contrary to NYS objectives as per NYS Housing Manual which says that senior housing units should be one bedroom at least since seniors stay at home more. <http://www.nyshcr.org/Publications/DesignHandbook/DesignHandbookSeptember2014.pdf> - (See 1.02.03 F Dwelling Unit Space for Seniors p. 6)

6) Civil rights law - Civil rights law does not allow the disabled to be segregated in low income and minority neighborhoods. Yet ZQA's changing ZQ 22-42 makes R3-R10 as of right for nursing homes and health related facilities. The City Planning Commission has stated that supportive housing for the mentally ill can fall under health related facilities in Oceanview Manor Home. <http://archive.citylaw.org/wp-content/uploads/sites/31/cpc/2013/04.15.13/130107-ZSK.pdf> ZQA has reduced the special permit Section 74-90 to rubble. Previous supportive housing guidelines as well as City Planning Guidelines required a FAIR SHARE residential beds analysis which has been removed and insults community character in low income minority neighborhoods. City Planning Datasets reference Supportive housing as a mental health care facility. MIH seeks to reinforce the loophole of supportive housing being classified as a non-profit with sleeping accommodations by making this law. (See page 20 of MIH definitions for Supportive Housing). Previously it was just a DOB Bulletin which gave direction. http://www.nyc.gov/html/dob/downloads/bldgs_bulletins/bb_2011-003.pdf . What the Commissioners should realize is that supportive housing, is not licensed and takes on off premises clients in residential neighborhoods. There was a FAIR SHARE test which is being removed. See - p 101 http://www.nyc.gov/html/dcp/pdf/pub/fair_share_guide.pdf . The City's Fair share does not work today because most supportive housing is private and the city's fair share law refers to city owned facilities. Changing ZR 22-42 will have a negative effect on the residential character of low income neighborhoods and will segregate the disabled.

There is a known case which has been ignored. 918 East New York Ave, Brooklyn NY 11203 is an 8 story building proposed to go up in the middle of a 2 story block of row houses. If ZQA is passed it can be 10 stories. If its a MIH zones...it can be a 13 story building. (See MIH 23-952)

The community district beds analysis is being removed as a gift to supportive housing but will commercialize the city's low income minority neighborhoods in violation of federal law.

I recommend a SUPPLEMENTAL EIS to deal with this immediately.

DCP, in their Housing Presentation, in the quote by Catholic Charities stated low income seniors do not have a waiting list for parking spots. Unfortunately sources have indicated a mistake in that Catholic Charities mostly has very low income at 30% AMI which refers to about 8% of the very low income population, NOT LOW INCOME population. This needs to be addressed.

Also , seniors outside of 1/2 mile from transit zone are discriminated against.

I request the application be denied and for an explanation of why the PUBLIC ADVOCATE was not noticed on the Public Scoping Notice.

Her website has not one TWEET or comment on either of these groundbreaking proposals.

The public has been denied the advocacy that the CITY CHARTER was supposed to provide.

(See Attachments)

Jay Sorid,
Brooklyn CB 9 ULURP

Laura Smith (DCP)

From: Karen Argenti <kabx101@gmail.com>
Sent: Monday, December 28, 2015 9:02 PM
To: Affordable Housing Text (DCP)
Subject: Comments to the NYC CPC on ZQA and MIH

12.28.2015

Dear City Planning Commission:

Thank you for this opportunity to comment on the New York City Planning Commission's zoning text proposals called Zoning for Quality and Affordability, Mandatory Inclusionary Housing, and assorted environmental reviews. The paucity of concern for the quality of life in our neighborhoods and the inability of this agency to recognize that government's task is to meet today's needs first – tomorrow's second.

For instance, the largest discharge to a sewer treatment plant is in CB 7 and 8. CSO WI056 discharges combined sewage of 1.346 billion gallons each day, from NYC's third largest sub-catchment – an area of the northwest Bronx of about 150,000 people - equivalent to the State's fifth largest city, right after Yonkers. Moreover, WI-056 is clogged in many places (as evidence by the street flooding), and discharges into the Harlem River during dry weather. Why is this happening? Over the past ten years, this sub-catchment area which includes parts of CB7 and 8) have experienced a tremendous amount of development. Lots of residential and commercial development but no infrastructure! Yet, the next ten years of affordable housing as planned in the ZQA and MIH includes no infrastructure! Let alone that there is no mention of the Croton Water Treatment Plant in VCP. Just ask yourselves, when was the last time there was a sewer project expansion? You can't answer it!

To add insult to injury, the only impacts mentioned in the ZQA DEIS are Shadows, Historic and Cultural Resources, Noise and a little bit of Hazardous Material (chapter 23). These are what the DEIS reviews for each

CEQR topic -- not the real environmental impact to our lives. The MIH EAS does even less; it finds no impact at all, except for two minor check marks at industry (2b.v), and child care centers for children under 6 (3b.i). The environmental studies for these proposals are fatally flawed, filled with mistakes, and lack the identification and mitigation of many large impacts. The following is a draft of missing or wrong:

Socioeconomic Conditions: There is no mention of the fiscal impact on taxpayers for real estate taxes forgiven is significant, and has been so for several decades. The result is real estate taxes will increase or services will be cut to meet the cost. Capital Projects to meet the other needs below will be significant and are not identified.

Community Facilities: There are no plans for new schools, parks or libraries to accommodate the increased need. Schools are already overcrowded. More children mean more seats for schools, day care, UPK, Libraries and Parks, etc.

Water and Sewer Infrastructure & Solid Waste and Sanitation

Services: As mentioned above, there is no plan for expansion. There is no mention of replacing old and clogged sanitary sewers, funding maintenance for existing sanitary and stormwater facilities, or removing Tibbetts Brook – clean water, from the sewer. Tibbetts Brook in Van Cortlandt Park discharges into the “largest outfall” at an estimated 1.45 million gallons of water per day (536 million gallons per year) or 40% of the total discharge. The cost to treat this is around \$1 million per year. However, treating sewage that was clean seems wasteful and raises our water bill.

Transportation: Congestion will increase especially if parking is discouraged in the transit zone. There is no plan to add subways, buses or increase the MTA capital budget. It is easier to get to Manhattan than the east side of the Bronx, which is why cars are needed to get around.

Neighborhood Character: What was once a mixed area of homes and buildings will forever be gone. This may have been the history of our

neighborhoods, but clearly the areas have reached the peak. Looking at it as an “amalgam of the various elements that give neighborhoods their distinct personality,” is not enough. When developers create fear in the minds of homeowners they accelerate movement which interfere with the “distinct personality.” While MIH has too many loopholes for developers, both proposals are give-aways to developers. Every area in the city where they will be in effect will end up with as many people crammed into the smallest apartments with the highest rents that can be squeezed out. Developers in the programs should have to pay impact fees to be used to upgrade infrastructure (sewers, water, etc.). Forget open spaces - there won't be any.

Public Health: A 2006 chart of annual CSO events indicates WI-056 outfall as having 51 rain events per year. However, there were only 46 inches of rain in 2005 with 20 events over ½ inch, and 50 inches of rain in 2014 with 30 events over ½ inch. Too many dry weather events indicate the pipe is full to capacity or blocked up. Then when there is too much rain, the discharge pollutes the Harlem River and the air.

Irreversible and Irretrievable Actions: Both proposals expand the power of the Board of Standards and Appeals (BSA). Whenever the BSA is allowed to grant an exception based on "financial relief" you have given developers a free pass, as we have seen again and again. Especially in 73-624, whenever the term "reasonable return"(sec a) is used you will give the BSA power to determine "reasonableness," which means anything will do, as proof will not be required, as we have seen with 3333 Giles Place. In the neighborhood, we call it the Builders Support Administration. Justify the need for these changes. Also put them IN the description for the ULURP and Environmental Reviews.

Please vote no. I look forward to your response to my comments to the ZQA DEIS and the MIH EAS.

Karen Argenti
3400 Paul Avenue, 12G
Bronx NY 10468

Karen Argenti



Think before you print.

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"If the soil is destroyed then our liberty of action and choice are gone..." - W.C. Lowdermilk, 1953

Laura Smith (DCP)

From: SANDY REIBURN <sandyr11217@yahoo.com>
Sent: Wednesday, September 30, 2015 11:30 AM
To: Affordable Housing Text (DCP)
Subject: Protest of Zoning for Affordability & Quality in Ft Greene-Outrageous Usurpation

Mr Bankoff, as Executive Director of the Historic Districts Council, says it exactly as many of us who live in Ft Greene feel about the impending roll back of the contextual zoning in our historic blocks and the proliferating imposition of towers in the so-called BAM Cultural Distict. The developers, under the guise of "affordable housing" are encroaching on appropriate "human" and historical scales in the free-for-all accommodation to REBNY and the quid pro quo payback from those electeds who are doing their bidding...Council Member Cumbo...and yes...our Mayor...among too many others to list! Mr Blankoff has diplomatically asserted the problem below...I'm not, as a South Elliott Place block representative, nearly as circumspect. The sham 'outreach' with its minimal notification and last minute announcements insult the intelligence. This disregard of community buy-in ...stinks.

Sandy Reiburn 26 year resident and property owner

"In March 2015, the City Planning Commission announced a proposal called Zoning for Affordability and Quality, which broadly calls for three principal changes in the current citywide zoning resolution. The plan proposes to change and enlarge definitions of senior housing to include more types of housing providers than currently permitted. It also proposes to increase buildable space for senior housing in some instances. The proposal also seeks to lessen or some instances no longer mandate parking requirements for designated affordable housing units or senior housing based on their proximity to mass transit. Finally, the proposal recommends raising the streetwall and building height limits from 10 – 20% within medium- and high-density contextual residential zones. The agency rationale for the proposal is to provide better development opportunities within the city which more fully utilize sites full allowable bulk. The agency further explains that by loosening building envelope and parking regulations especially for senior and quality housing developments, more housing inventory will be created to help address the city's need for these kinds of housing. The City Planning Commission is accepting comments on the draft scope of the environmental review for the proposal until April 30 2015 and, according to the agency's projected timelines, hopes to bring the final proposal forward for public review and discussion in the early Fall.

Since their introduction almost 25 years ago, many communities across New York City have looked to contextual zoning to help protect the character of their neighborhoods and encourage appropriate new development which enhances where they call home. These are not fly-by-night efforts; frequently volunteers spend years in meetings with community stakeholders and decision-makers, carefully crafting zoning regulations which correspond with the existing built neighborhood. More often than not, professional planners and consultants are hired to guide the process, facilitate collaboration with all stakeholders and work with the Department of City Planning to determine if local plans can align with the agency's citywide mandate. Usually there is a great deal of compromise in all these negotiations and many community-driven proposals never came to fruition because of irreconcilable differences between the stakeholders and the city. It is actually uncommon for a community-driven plan to be adopted by City Planning. To rearrange the ground rules on a citywide basis as this proposal does, ignores the long effort, careful study and strong investment of community members and planning professionals.

Frankly put, this plan as it is proposed, takes the context out of contextual zoning. It arbitrarily raises height limits and diminishes yard requirements across the city according to a mathematical nicety, not based in the actual built fabric of our city's neighborhoods. New York thrives because of the diversity

of its neighborhoods, yet this proposal's approach will deal with each neighborhood as the same, with a one-size-fits-all approach. A calculation of potential growth based on a model is not the same as actual development, especially when one considers the diversity of New York's built environment. The department has not released any information to show that studies of the median street wall, set-back height or yard coverage of all the potential areas affected will be done. This amendment will affect a lot of properties – approximately 10.4% of New York City, according to our calculations. The potential impact must be studied carefully before being executed.

This is a plan without prescription. It should be prescribed that only units constructed for affordable or senior housing receive height bonuses, which would incentivize construction of the housing stock that is the genesis of this proposal and that the City so desperately needs. At this moment, the proposal incentivizes all development, without any guarantee that it will actually house New Yorkers who are rent-burdened. In fact, a point could be made that this might incentivize demolition of existing housing in order to replace it with new development utilizing the proposed as-of-right height limits. This could increase displacement while only adding more market-rate housing to the pool. Bigger buildings do not equal lower rents, if that were the case, West 57th Street would be Manhattan's newest neighborhood for the middle class.

There is also no explanation of how building higher will mandate construction of quality buildings like the examples in the proposal. Interestingly, the new construction that City Planning aspires to create is found in historic districts in all five boroughs, as these buildings are designed from a human perspective and new development is carefully scrutinized to meet its context. It is outside of the city's historic and contextual districts where true banality dwells and quality design is an elusive sight. Finally, the Historic Districts Council is concerned that this proposal has not taken into consideration the undue burden on contextually-zoned properties that are regulated by the Landmarks Preservation Commission (LPC). LPC is already hard-pressed regulating property for "appropriate" development in instances when the as-of-right base zoning allows substantially more potential building mass than what is actually built – relief of this pressure is one reason why contextual rezonings are often paired with historic district designations. By raising the height limits and lessening the yard requirements to landmark properties, the development expectations are increased and the LPC is given the unenviable task of having to resist policy enacted by a sister city agency. This could result in hardship claims, legal challenges and undue pressures on the LPC to act outside of its own mission. Truly, this is a plan which was not formulated with New York's neighborhoods or the people who love them in mind."

Laura Smith (DCP)

From: Valerie Landriscina <vlandriscina@gmail.com>
Sent: Wednesday, October 14, 2015 5:47 PM
To: Affordable Housing Text (DCP)
Subject: October 13, 2015 Community Board 15 presentation

Hello,

Thank you for your presentation to CB15. I wish more residents understood the needs of the city on a more global scale and asked provocative questions rather than shoot ideas down.

Some comments:

- I support the proposed added height for 1st floor commercial spaces and also the concept of greater floor heights for the upper stories by setting the cap on number of stories. My concern is developers will still find a way around it.
- I grew up in Manhattan Beach, where my parents still live but moved to Boro Park/Sunset Park where there are many prewar/Finnish co-ops with courtyards. Im excited to hear the support for courtyard design in new construction and dedication of open/landscaping spaces. For areas where parking will be required, I think there should be an emphasis on hiding parking behind/under buildings so the street experience is more pleasant.
- Somehow I think the city needs to be more forceful with requiring new construction to match the scale and materials of the neighborhood. This is one of the downsides of CB15. They accept ugly construction so long as there's parking but dont realize the loss in property value. As an aside, it's unfortunate city planning ignores the architectural styles of Manhattan Beach and doesnt consider contextural zoning a requirement for the neighborhood. A lot of the architecture is being lost, but this is a battle for another day..
- Regarding the transit hub zones where parking won't be required, why can't zoning require alternative means of transportation as part of a developer's project? i.e. Bike spaces, and motorized wheelchair spaces, in conjunction with a promise from the city to increase buses along these routes, add comfortable sidewalk furniture, like benches to serve as rest stops for elderly pedestrians? This may win some of the disgruntled people. This would be similiar to a new street tree requirement and could be offsite.
- My parents' concern is struggling to find parking while shopping locally. It's a valid concern; we all want residents to engage in their local commercial district rather than drive further away to a suburban type strip mall set up like the Erskine/Belt Parkway shopping district. Doesn't this mean there should be an emphasis on creating new commercial nodes (or reviving depressed ones) to deal with the influx of additional people --and, not as a separate city plan, but part of the housing campaign? Additionally, this commercial space needs to visually fit into the landscape.
- This is too far reaching an idea I'm sure but are there any brownfield sites (i.e. southeast corner of Ocean Avenue and Avenue V) that can be acquired, remediated by the city, serve for an underground munimeter parking lot/ as well as a ground level park/storm water management site?
- Several months ago Vicki Been spoke at NYU about the endeavor and difficulties with coordinating all the city agencies when new development occurs. If communities were told that by bringing in new affordable housing, green infrastructure or better general infrastructure will be part of the zoning changes, the presentation may be more amenable to the public. Emphasis should be that infrastructure will handle the additional load of people + improve the lives of the existing community. Of course, if this work cannot be coordinated, don't mention it..

Thank you.

Valerie Landriscina
917-518-5243

My name is Barnabas Wolf, I am a resident of Prospect Lefferts Gardens in Brooklyn, New York. I am a member of Concerned Citizens For Community Based Planning. We believe it is important to maintain neighborhood character with respect to density and scale. We seek to preserve the essentially low rise early 20th century streetscape of Prospect Lefferts Gardens, which is sometimes uniform and sometimes varied with diverse housing types. Both the houses and the pre-war apartment buildings in our community were built as an expression of middle class aspirations to escape the crowded tenements of 19th century Manhattan. Light and air, high quality building materials, and a “country in the city” feel were a planned part of that neighborhood character. Over the years, our neighborhood has welcomed successive generations of immigrants while maintaining this low rise built character and wonderful historic housing stock.

Our neighborhood is already the densest in Brooklyn with 60,536 residents per square mile (2010), and is set to become even more dense for decades to come. Unlike Park Slope, we do not expect a significant reduction in population through gentrification. Ninety percent of our housing units consist of rent stabilized apartments, rather than townhouses. Our population has in fact remained relatively stable since the 1970's, and we choose to remain a stable family neighborhood. At this point additional density is a burden, not a benefit to our community even if you promise to spruce up our infrastructure.

We are concerned about an overemphasis on growth through residential development as opposed to economic development. We would like to pursue a comprehensive community based planning process that considers industrial, commercial, and non profit community uses as viable alternatives (not simply add-ons) to residential uses. Even as the city's economy transitions away from heavy industry, newer types of businesses and organizations still seek affordable space, and are still needed to generate the jobs that are the foundation of the stability and middle class aspirations of our neighborhood.

We support “rightzoning” in Community District 9 that would eliminate unnecessary additional building envelope capacity and keep new buildings at or below the heights of the majority of existing buildings (95% of buildings are less than 50 feet tall). Given the need for measures to stabilize our community and protect our residents, who are currently being endangered by speculative construction and overdevelopment, we cannot support legislation that moves in the opposite direction by giving broad approval to height and density increases for new development.

Much of Community Board 9 is covered by broadly applied R6 and R7 districts, imposed at a time when the city sought sweeping urban removal and disfavored diverse, semi-urban neighborhoods such as Prospect Lefferts Gardens. As a result, many of the protections in the zoning code afforded to suburban neighborhoods zoned for one and two family houses are unavailable in our district in spite of the fact that many blocks have stable communities consisting of a mixture of such houses as well as three to six story pre-war apartment buildings.

Commercial streets in Prospect Lefferts Gardens, some of the oldest in Flatbush, were not laid out with high traffic volumes and tall apartment buildings in mind. The typical building on our commercial avenues is 3-4 stories in height. Hence, our section of Flatbush Avenue for example is a relatively narrow three lane road, compared with “major” thoroughfares built in the post war era, and has minimal sidewalks. Where six story apartment buildings were built before zoning codes were promulgated or enforced, many have very small yards and required windows along side lot lines adjacent to low scale commercial buildings or small houses. The original builders actually counted on these smaller neighboring houses to function as their required open space. Therefore, zoning which encourages “infill” development has a serious negative impact on the health and welfare of adjacent rent stabilized tenants. Relying on such development to produce new affordable housing is simply

robbing Peter to pay Paul (and the developer).

Specific Comments on Zoning For Quality and Affordability

These are our recommendations to address some of the general issues and some conditions specific to our district and our neighborhood:

- We oppose the increased building height and setback changes in the higher density residential districts, as well as the elimination of existing provisions which limit exceedingly tall sliver type of buildings on narrow lots.
- We propose (at least in CD9) that where the DOT has designated a corridor as congested within the last five years, that street should only be considered a “wide street” for purposes of ZR 23-154 and ZR 23-145 if the average width of the street is greater than or equal to 100 feet and the average sidewalk width is greater than or equal to 20 feet. Street width is meant to be a proxy for whether the street and sidewalks can handle increased density in terms of pedestrian and car traffic; whether or not the street is already congested or the sidewalks already narrow must be taken into account.
- We are concerned, in general, about the uncharacteristic proposed bulk of senior housing and care facilities. We oppose changes eliminating protections against the oversaturation of nursing homes and other types of supportive housing and long term care facilities, and oppose changes incentivizing the proliferation of for profit senior housing, including text changes allowing for profit “independent senior affordable residences” with only 20% affordable housing to be eligible for density bonuses which are currently permitted only for “non profit elder care facilities”. The protections against oversaturation and limitations on the types of senior housing eligible for bonuses are NOT outdated; many Brooklyn neighborhoods already contend with unscrupulous for profit nursing home and supportive housing operators.
- We oppose 100% lot coverage for corner lot buildings in quality housing developments and changes in the shallow lots regulations, reducing the depth of rear yards. Lot coverage should be no higher than 80%, regardless of lot width. (See the next item)
- We oppose allowing rear extensions to fill the rear yard up to 15' in height in denser contextual zones, intruding on the collective rear yards. Rear yards are a much beloved characteristic of Brooklyn neighborhoods such as ours. They are a particularly important source of open space for residential buildings on mixed use/commercial avenues where there are traditionally no front yards and no courtyards.
- We oppose the reduction of minimum distances between two or more buildings, applying a lower standard for light and air for dwelling units and to the increasing of building heights in the transitional areas between divergent zoning districts.
- We are concerned about elimination or reductions in parking requirements for new senior

development, in all zones, both within and outside the transit zones. The reduction in parking requirements exacerbates overall parking shortages and ignores the parking needs of the facility residents, staff, and visitors. While we recognize that some programs used to finance low income senior housing do not allow parking spaces to be rented to non-residents and that residents do not fully utilize existing parking spaces, it would seem that the solution is to lobby for changes that would allow excess parking spaces to be rented to the community, not zoning changes to eliminate parking requirements.

- Finally, we think it is nice for the zoning code to allow bay windows and front courtyards, but we prefer that our historic neighborhood should simply be landmarked to protect existing wonderfully articulated, high quality buildings, and require design review for new buildings to ensure they are in keeping with the historic character of the rest of the neighborhood.

Specific Comments on Mandatory Inclusionary Housing

Concerned Citizens believes a policy of increasing height and market rate density to subsidize a small number of income linked units is not appropriate for Community District 9, given community goals to keep our neighborhood affordable by curbing overdevelopment and speculation, and preserving our large stock of existing rent stabilized housing. We are deeply concerned that given the existing need for rightzoning, higher density mandatory inclusionary zones would contribute to the destruction of existing affordable housing as well as neighborhood character, and cause secondary displacement of lower income residents. **We therefore oppose all height and density increases proposed for MIH zones as well as similar arrangements for voluntary inclusionary zones.**

Subsidizing affordable housing through density increases places the burden of paying for such housing on those who happen to live near a development site, including both tenants and homeowners. In an affordable, medium to high density neighborhood such as ours, this burden is already falling on low income seniors in rent stabilized buildings who are losing windows, may be evicted by landlords claiming structural instability due to adjacent construction, are being threatened by unsafe construction on top of occupied buildings, dust and noise etc. The environmental costs of losing light, air, public space, and neighborhood character can be enormous because the impacts are permanent and widespread. We need downzoning everywhere, yet these two amendments offer us only upzoning.

If we truly have a citywide housing crisis and seek to reduce inequality, then the burden of subsidizing affordable housing should be shared citywide, according to ability to pay, i.e. via income taxes. For that matter, the NYC comptroller has announced a budget surplus of \$1.83 billion – it is likely that we do not even need to raise taxes, but to decide that subsidizing lower income New Yorkers to live in a high cost city is a priority. Rents of existing lower income residents should be subsidized directly as the need arises; “trickle down” policies that subsidize additional market rate or middle income development only serve to further distort the efficient functioning of the real estate market and cost us far more per affordable apartment than a direct subsidy. Density and height should be determined by local desires, accurate data, and otherwise good planning practices to produce livable, beautiful and sustainable neighborhoods. Land use should likewise be determined by balanced and holistic economic planning, rather than an environmentally unsustainable drive to increase population.

Con preocupación vemos las propuestas del alcalde acerca de vivienda inclusiva obligatoria (MIH) para una comunidad definitivamente pobre, cuando vemos el ingreso promedio de estas comunidades, Washington Heights, Inwood, Marble Hill y una propuesta tan baja de vivienda, donde existe una sobre población, lo que defina una alta demanda de vivienda.

Los organismos que inciden en sector habitacional deberían garantizar un porcentaje mayor de apartamentos para los residentes del área, de lo contrario ocurrirá lo que en otras comunidades, que sus residentes tiene que emigrar a otras comunidades, provocando inconvenientes, en los servicios públicos que reciben.

El Alcalde y los políticos del área deben ser mas consecuentes con sus comunidades y tener un mayor acercamiento para conocer de sus impresiones y preocupaciones sobre el tema sobre todo donde se garantice la permanencia de los residentes, quienes han estado allí por mas de cuarenta y cincuenta años.

-Roberto Francis, Residente de Inwood, Manhattan

Testimony by Betty Mackintosh, Manhattan CB4,
Co-Chair of Chelsea Land Use Committee
at CPC public hearing about MIH and ZQA proposals,
December 16, 2015

Good morning Chair Weisbrod and Commissioners. I am Betty Mackintosh, member of MCB4 and Co-Chair of the Chelsea Land Use Committee.

MCB4 voted to recommend denial of the ZQA proposal unless a number of modifications are made. We urge that the ZQA proposal for two areas in Chelsea be modified and that the increased ground floor height text be removed.

East Chelsea

The East Chelsea area (a 64-block area east of Sixth Avenue between West 14th and West 34th Streets) is increasingly faced with development pressures as building sites in West Chelsea are getting scarcer. A 1996 rezoning for this East Chelsea area, based on an adopted 197-a plan, created housing opportunities on the avenues, and balanced new development with the preservation of neighborhood context on side streets. The ZQA proposal, if approved, would override the zoning regulations for the building height and street wall limits on the side streets, measures that were carefully crafted with DCP's support to preserve the neighborhood context.

Therefore MCB4 requests that the ZQA proposal include zoning text consistent with the height and setback limits established by the 1996 East Chelsea rezoning.

Special West Chelsea District

The Special West Chelsea District (SWCD) was adopted in 2005 for a 17-block area, governing the transfer of development rights from the Highline. The western portion of West 23rd Street fronting 11th Avenue was included. However the eastern portion of the West 23rd Corridor (mid-block West 22nd to West 24th Streets) remained governed by the underlying zoning (C6-2A and C6-3A) because this zoning reflected the community context. The

For the following commentators, due to inclusion of personal information on the documents they submitted, please see Stack Letter #7.

- **Alicia Greenberg, 10/19/15 written statement,**
- **Mary Ann Zonsky, 9/9/15 written statement,**
- **Kathleen Shannon, 10/1/15 written statement**
- **Teresa and Mario Alvarez 10/19/15 written statement**
- **Maria and Dennis DeVoti 10//15 written statement**
- **Henry Euler and Aline Euler 10/19/15 written statement**

ZQA proposal would increase streetwall and building heights by varying amounts in this Corridor and would not respect the community context.

Therefore MCB4 requests that the ZQA proposal be modified so that the original zoning regulations (98-423 and 98-50) with the height and setback limits on the eastern West 23rd Street Corridor -- as agreed on in 2005 -- replace the currently proposed measures in ZQA.

Ground Floor Heights

The ZQA proposal recommends an increase of the permitted ground floor height in buildings with residential units on the ground floor to elevate unit windows above street level and to allow for the addition of retail spaces which require heights greater than the current permitted maximums. MCB4 believes that this proposal, if adopted, would create out of scale first floors that would not be in context with the surrounding existing buildings.

Many new buildings in MCD4 have been constructed with ground floor commercial spaces on both avenues and narrow streets. A wide variety of businesses, constructed within the current zoning regulations, are thriving. Appendix J, attached to our 11/30/15 letter, contains 13 photos showing such businesses.

Therefore MCB4 requests that the text proposing changes to permitted ground floor heights be deleted from the ZQA proposal.

CITY PLANNING COMMISSION
Calendar Information Office - 31st Floor
120 Broadway, New York NY 10271

12/19/15

To Whom It May Concern:

I am writing to say I support the testimony and position of the Landmarks Conservancy and oppose upzoning large sections of the City in a one-size-fits-all plan without local community input.

The “ZQA” and “MIH” plans would negatively affect the quality of life in New York City by raising height limits in districts across the City with contextual zoning, affecting long established Historic Districts and upsetting the balance desired by the communities that fought to establish these Districts, and unduly favoring developer projects without ultimately assuring gains in affordable units, as weighed against exploring existing options for affordable housing in some of these same neighborhoods.

These plans are being moved through the review process in an accelerated, untimely, and undemocratic manner during the holiday season – bear witness the extreme circumstances of the recent sole hearing for public testimony, causing the need for letters such as this to express an opinion instead of allowing time for proper review and debate.

PLEASE IMMEDIATELY PROVIDE TIME FOR THE FULL CONSIDERATION OF THESE POTENTIALLY DAMAGING PLANS, WHICH NEED TO BE MORE CAREFULLY STUDIED AND AMENDED AS NECESSARY TO GAIN THE DESIRED RESULTS AS PERTAIN TO THE GOAL OF PROVIDING AFFORDABLE HOUSING.

Thank you for your consideration,

Majda Kallab
235 West 102 Street – 15C
New York, NY 10025

Majda Kallab 12/19/15

EMAIL: mjkbw@comcasat.net

G: Form (Stack) Letters

Stack Letter #1

From: [REDACTED]
To: [REDACTED]
Subject: Oppose the 'Zoning for Quality and Affordability' Plan
Date: Thursday, January 07, 2016 8:53:45 AM

Dear Mr. Weisbrod:

Communities and community boards across the city have rejected the 'Zoning for Quality & Affordability' proposal. I urge you to as well. This is a one-size-fits-all citywide zoning change that fails to take into account local conditions, goals, or desires, limits the tools in our zoning tool box, and eliminates the leverage that local communities, their Councilmember, and their Borough President would normally have over a local rezoning (as opposed to a citywide zoning text amendment such as this). It would also undo years of hard work and compromise by communities to achieve the height limits they current have, the price for which was often accepting upzonings along with them.

Perhaps worse, it purports to increase the quality and affordability of new developments with minimal impact upon neighborhood character. Unfortunately, none of this is true.

ZQA would grant 5-20 foot height increases for market rate developments without any public benefit. It would grant much greater height increases (up to 25-50 feet and as much as 31%) for 80% market rate/20% 'affordable' developments under the pretense that such height increases would encourage more developers to include the 20% affordable housing. But there is no evidence to support this claim and much evidence to contradict it.

ZQA would also allow previously prohibited 'sliver' buildings and rear yard incursions under circumstances where they are not currently allowed. It would also grant very generous bulk and height bonuses to developers for including just 20% 'senior affordable housing' which many say would be unaffordable to the seniors who need it most and would only be required to remain senior affordable housing for 30 years.

ZQA would not make our city's housing better or more affordable. It would only make it bigger and taller. I urge you to oppose the 'Zoning for Quality and Affordability' plan.

The Mandatory Inclusionary Housing (MIH) proposal would also, as proposed, potentially do more harm than good. The Mayor has said MIH would only be applied in cases where there is a significant increase in the amount of allowable market rate development. This means affordable housing will only be mandatory if and when a huge amount of new market rate housing will also be created. This is exactly what was done in areas of the city like West Chelsea/Hudson Yards and Williamsburg/Greenpoint. While some affordable housing was built, the flood of market rate housing pushed up prices and made these neighborhoods overall exponentially less affordable. And the scale and sense of place of these areas was totally destroyed.

James Wesolowski
[REDACTED]

Stack 1: I oppose the 'Zoning for Quality and Affordability' Plan

A. S. Evans, 12/04/2015 (written statement)
Aaron Sosnick, 11/24/2015 (written statement)
Adrienne Cooper, 11/29/2015 (written statement)
Ajit Laroia, 12/14/2015 (written statement)
Alan Schwartz ,11/23/2015 (written statement)
Alex Story, 12/15/2015 (written statement)
Alexander Dupuy, 12/18/2015 (written statement)
Alexandra Baltarzuk, 12/04/2015 (written statement)
Alice Baldwin, 11/23/2015 (written statement)
Alice Brody, 11/26/2015 (written statement)
Alicia Galitzin, 12/14/2015 (written statement)
Alison Beal , 12/15/2015 (written statement)
Allan Horst, 11/28/2015 (written statement)
Allen Prusis, 12/15/2015 (written statement)
Allison Tupper, 11/23/2015 (written statement)
Alyssa Bishop, 12/09/2015 (written statement)
Amy Brenna, 12/14/2015 (written statement)
Amy Gilfenbaum, 11/25/2015 (written statement)
Amy Harlib, 11/23/2015 (written statement)
Amy Newman, 11/28/2015 (written statement)
Andrea Barrett, 12/15/2015 (written statement)
Andrew Brana, 11/28/2015 (written statement)
Anita Wortman , 12/15/2015 (written statement)
Ann & Donald Becker, 11/24/2015 (written statement)
Ann McDermott, 11/30/2015 (written statement)
Ann Yanovsky, 12/16/2015 (written statement)
Anna Antoniak, 12/01/2015 (written statement)
Anna Buonanno, 12/15/2015 (written statement)
Anne Marie Paolucci, 11/23/2015 (written statement)
Anne Mitcheltree, 11/23/2015 (written statement)
Anne Renda, 01/11/2016 (written statement)
Anne Taylor Davis, 11/23/2015 (written statement)
Annie Edwards, 01/17/2016 (written statement)
Anthony Ceretti , 11/28/2015 (written statement)
Anthony Gramm, 12/03/2015 (written statement)
Anthony William & Mary Greve Foundation
Antoia Rossello, 01/17/2016 (written statement)
Antonia Batalias, 12/15/2015 (written statement)
Arisel Garcia, 12/16/2015 (written statement)
Arlene Mehlman, 12/04/2015 (written statement)
Barbara Blumberg, 11/27/2015 (written statement)
Barbara Bononno, 11/29/2015 (written statement)
Barbara Goren, 12/15/2015 (written statement)
Barbara Jaffe, 12/04/2015 (written statement)
Barbara Lampas, 11/26/2015 (written statement)
Barbara Loeb, 12/15/2015 (written statement)

Barbara Miller, 12/09/2015 (written statement)
Barbara Neuhaus, 12/16/2015 (written statement)
Barbara Okishoff, 11/27/2015 (written statement)
Barbara Silverstein, 01/11/2016 (written statement)
Barbra Music, 01/16/2016 (written statement)
Barry Bloch, 11/26/2015 (written statement)
Becky Porath, 11/25/2015 (written statement)
Benjamin Darche, 12/04/2015 (written statement)
Benjamin Marcus, 12/15/2015 (written statement)
Bernette & George Ford, 12/05/2015 (written statement)
Beth Haskell, 01/11/2016 (written statement)
Beth Sopko, 12/15/2015 (written statement)
Betsy Arvidson Hartigan, 12/14/2015 (written statement)
Betty Lynd, 11/27/2015 (written statement)
Bill Rose, 11/24/2015 (written statement)
Bill Rosser , 11/24/2015 (written statement)
Blaine Birchby, 12/14/2015 (written statement)
Bonnie Rosenstock, 12/14/2015 (written statement)
Boyd Babbitt, 12/15/2015 (written statement)
Brian Stemmer, 11/24/2015 (written statement)
Brian Weber, 11/23/2015 (written statement)
Bruce Ebnother, 01/18/2016 (written statement)
Bruce Silberblatt, 12/06/2015 (written statement)
C. M. P, 11/24/2015 (written statement)
C.S., 12/14/2015 (written statement)
Camille Cooper, 11/28/2015 (written statement)
Carlo Lamagna, 12/9/2015 (written statement)
Carmen Ristorucci, 12/04/2015 (written statement)
Carol Flamm Reingold, 12/15/2015 (written statement)
Carol Ruthberg, 11/25/2015 (written statement)
Carole Mavity, 11/23/2015 (written statement)
Carole Shoenthal, 12/18/2015 (written statement)
Caroline King, 11/28/2015 (written statement)
Caroline Oyama, 11/23/2015 (written statement)
Carolyn Goldhush, 11/23/2015 (written statement)
Carolyn Wells, 11/23/2015 (written statement)
Catherine Brandli, 12/15/2015 (written statement)
Charlene Lichtenstein, 11/28/2015 (written statement)
Charles Edwards, 12/14/2015 (written statement)
chin yuien, 11/30/2015 (written statement)
Christian Zimmermann, 12/18/2015 (written statement)
Christine McVay, 12/16/2015 (written statement)
Christopher Pedersen, 12/15/2015 (written statement)
Claire Gaines, 11/28/2015 (written statement)
Claire Moed, 12/14/2015 (written statement)
Cleo Dana, 12/15/2015 (written statement)
Clora Kelly, 12/15/2015 (written statement)

Colin J. & Maureen M. Gibson, 12/14/2015 (written statement)
Constance Christopher , 11/23/2015 (written statement)
Constance Dondore, 12/14/2015 (written statement)
Constance Gill, 11/24/2015 (written statement)
Cora Rosevear, 12/07/2015 (written statement)
Cori Mann, 11/28/2015 (written statement)
Craig Heard, 11/27/2015 (written statement)
Crista Grauer, 12/14/2015 (written statement)
Cynthia Garnant, 12/15/2015 (written statement)
Cynthia Pyle, 11/23/2015 (written statement)
Cynthia Sayer, 01/16/2016 (written statement)
Dale Van Dyke, 11/23/2015 (written statement)
Daniel Thompson, 12/15/2015 (written statement)
Darryl Nipps, 11/28/2015 (written statement)
David Achelis, 11/29/2015 (written statement)
David Cohn, 12/04/2015 (written statement)
David Heerwagen, 12/16/2015 (written statement)
David Hottenroth, 11/24/2015 (written statement)
David Marcus, 12/18/2015 (written statement)
David Rosenberg, 12/14/2015 (written statement)
David Sandman, 12/14/2015 (written statement)
David Schoenkin, 12/18/2015 (written statement)
Debbie Honig, 12/15/2015 (written statement)
Debra Barros, 11/28/2015 (written statement)
Deborah Friedman , 12/18/2015 (written statement)
Deborah Lyons, 12/18/2015 (written statement)
Deborah Pierce, 12/01/2015 (written statement)
Deirdre Barry, 12/21/2015 (written statement)
Deley Gazinelli, 12/14/2015 (written statement)
Devon Clayton, 11/27/2015 (written statement)
Diane Fraher , 12/4/2015 (written statement)
Diane Reinhardt, 12/04/2015 (written statement)
Diane Specioso, 12/16/2015 (written statement)
Diane Whelton, 11/24/2015 (written statement)
Dianna Maeurer, 12/15/2015 (written statement)
Dianne Mendez, 12/03/2015 (written statement)
Dina Elkan, 12/17/2015 (written statement)
Dinah Bazer, 12/04/2015 (written statement)
Dixie Martin, 01/16/2016 (written statement)
Don Huber, 12/15/2015 (written statement)
Donna Gould, 12/23/2015 (written statement)
Donna Mastrandrea, 11/23/2015 (written statement)
Dorothy Gingeras , 12/16/2015 (written statement)
Dorria Ameen, 12/14/2015 (written statement)
Doug Beube , 12/4/2015 (written statement)
Douglas Collura, 12/14/2015 (written statement)
Douglas Irwin, 12/18/2015 (written statement)

Dr. Susan Draper, 12/1/2015 (written statement)
Ed Jaworski, 12/02/2015 (written statement)
Ed Tomney, 12/05/2015 (written statement)
Edgar Jackson, Jr., 12/01/2015 (written statement)
Edith Lewis, 12/03/2015 (written statement)
Edward Shoenthal, 12/18/2015 (written statement)
Eileen Bermingham, 11/24/2015 (written statement)
Elaine King, 11/28/2015 (written statement)
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Elisabeth Purcell, 12/14/2015 (written statement)
Elizabeth Bonapfel, 12/14/2015 (written statement)
Elizabeth Cox, 12/15/2015 (written statement)
Elizabeth Cuccaro, 11/30/2015 (written statement)
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Ellen Berliner, 11/28/2015 (written statement)
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Ellen Kenigsberg, 12/14/2015 (written statement)
Ellen Robbins, 1/1/2016 (written statement)
Ellis Avery, 12/14/2015 (written statement)
Els Phillips , 12/20/2015 (written statement)
Emily Blitzer, 11/24/2015 (written statement)
Eric Joost, 12/14/2015 (written statement)
Eric Rayman, 12/14/2015 (written statement)
Eric Zinn, 12/20/2015 (written statement)
ericka hamburg, 11/28/2015 (written statement)
Estelle Needleman, 11/27/2015 (written statement)
Ethan Addes, 11/30/2015 (written statement)
F F, 11/29/2015 (written statement)
Farah Apfel, 11/24/2015 (written statement)
Ferne Goldberg & Allan Sperling, 11/24/2015 (written statement)
Flora Resnick, 11/23/2015 (written statement)
Frances Edwards, 12/106/2015 (written statement)
Francis Hartigan, 12/15/2015 (written statement)
Francisca Benitez, 12/12/2015 (written statement)
Franklin Vagnone, 11/28/2015 (written statement)
Gabrielle Everett , 12/15/2015 (written statement)
Gail Goldsmith, 01/11/2016 (written statement)
Gail Gregg, 01/15/2016 (written statement)
Gary McCraw & Siri Kuptamethee, 11/23/2015 (written statement)
Gary Tomei, 12/14/2015 (written statement)
Gene & Shirley Secunda, 12/14/2015 (written statement)
George Calderaro, 12/15/2015 (written statement)
George Dorris, 12/14/2015 (written statement)

Gerald eMail, 12/14/2015 (written statement)
Gerald Kline, 01/15/2016 (written statement)
Gilda Pervin, 12/14/2015 (written statement)
Giorgio Bovenzi, 12/14/2015 (written statement)
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Glenn Kelly, 11/24/2015 (written statement)
Grace Polk, 11/28/2015 (written statement)
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Harold Appel, 01/04/2016 (written statement)
Harriet Reed, 12/04/2015 (written statement)
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Harry Bubbins , 12/14/2015 (written statement)
Heather campbell, 12/14/2015 (written statement)
Hedy Hauptman, 11/20/2015 (written statement)
Heide Kahme, 12/19/2015 (written statement)
Heidi Klaimitz, 12/01/2015 (written statement)
Helen Chirivas, 01/15/2016 (written statement)
Helen MANGIONE, 11/28/2015 (written statement)
Holly eMail , 12/01/2015 (written statement)
Holly Kowitt, 12/19/2015 (written statement)
Howard Charles Yourow, 12/14/2015 (written statement)
Hunter Lane, 12/06/2015 (written statement)
Irving Mintz , 12/18/2015 (written statement)
Isabel Sanchez Sachs, 11/29/2015 (written statement)
Jack Barth, 12/15/2015 (written statement)
Jack Kravitz, 11/29/2015 (written statement)
Jack La Torre , 12/4/2015 (written statement)
Jacqueline Duran, 11/24/2015 (written statement)
Jacqueline Helt, 12/03/2015 (written statement)
James Gormley, 12/15/2015 (written statement)
James Wesolowski , 1/7/2016 (written statement)
James Winton, 12/16/2015 (written statement)
Jamie Johnson, 12/03/2015 (written statement)
Jan Thompson, 01/10/2016 (written statement)
Jane Cytryn, 12/14/2015 (written statement)
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Jason Weiss, 12/01/2015 (written statement)
Jaya Saxena, 12/14/2015 (written statement)
Jean Arrington, 11/28/2015 (written statement)
Jean Standish , 12/14/2015 (written statement)

Jeanne Epstein, 11/29/2015 (written statement)
Jeff Wells, 12/18/2015 (written statement)
Jeffrey & Linda Franklin , 12/18/2015 (written statement)
Jeffrey Poole, 12/14/2015 (written statement)
Jeffrey Rabkin , 12/18/2015 (written statement)
Jenna Duffy, 11/26/2015 (written statement)
Jennifer Marshall , 12/14/2015 (written statement)
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Jenny Dubnau, 12/18/2015 (written statement)
Jeremy Matshall , 12/14/2015 (written statement)
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Jill Godmilow, 01/11/2016 (written statement)
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Joan Hall, 12/03/2015 (written statement)
Joan Klyhn , 12/14/2015 (written statement)
Joan Kreiss, 11/28/2015 (written statement)
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Joanna Kapner, 12/05/2015 (written statement)
Joanne Bagan, 12/14/2015 (written statement)
joel rutten, 11/29/2015 (written statement)
Jogn H Wilson, 12/18/2015 (written statement)
Jogn Mauk Hilliard, 12/22/2015 (written statement)
John C. Waddell, 12/14/2015 (written statement)
John Doyle, 12/18/2015 (written statement)
John H Wilson, 11/29/2015 (written statement)
John Hunter , 12/18/2015 (written statement)
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John Huttlin, 12/18/2015 (written statement)
John Kapner, 12/06/2015 (written statement)
John Mauk Hilliard, 11/23/2015 (written statement)
John Richards, 11/28/2015 (written statement)
Jon Verbalis , 12/18/2015 (written statement)
Jonathan Stern, 12/14/2015 (written statement)
Josefa Certo, 12/18/2015 (written statement)
Joseph Kelly, 11/24/2015 (written statement)
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Joy Cytryn, 12/18/2015 (written statement)
Juana Gonzalez, 12/15/2015 (written statement)
Judith Bronfman, 01/12/2016 (written statement)
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Judith Pucci , 12/14/2015 (written statement)
Judith Smorto, 11/28/2015 (written statement)

Judith Wilkinson, 11/23/2015 (written statement)
Judy Cuttler, 11/29/2015 (written statement)
Judy Washington Square Hotel, 12/18/2015 (written statement)
Julie Rupprecht, 12/19/2015 (written statement)
Julie Zellat, 11/29/2015 (written statement)
Julio Munoz, 01/16/2016 (written statement)
June Fait, 12/19/2015 (written statement)
Justin Ferate, 11/28/2015 (written statement)
Justine and John Leguizamo, 12/18/2015 (written statement)
K L Hufnagel, 12/16/2015 (written statement)
Karen Brown, 11/29/2015 (written statement)
Kari Thorstensen, 12/21/2015 (written statement)
Karin Cudd , 12/18/2015 (written statement)
Kate Puls, 12/26/2015 (written statement)
Kate Robin, 12/15/2015 (written statement)
Katharine Baum, 12/14/2015 (written statement)
Katherine Schoonover, 12/14/2015 (written statement)
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Kathy Bierman, 12/19/2015 (written statement)
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Kathy von Hartz, 11/28/2015 (written statement)
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Keltha McAulay, 11/28/2015 (written statement)
Kenneth Furie, 11/29/2015 (written statement)
Kenneth Hittel, 12/09/2015 (written statement)
Kevin McEvoy, 12/15/2015 (written statement)
Kevin West, 12/14/2015 (written statement)
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Kristin Howe, 11/28/2015 (written statement)
kriti Siderakis, 11/29/2015 (written statement)
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Laura Burdick, 12/15/2015 (written statement)
Laura Caparrotti, 12/15/2015 (written statement)
Laura Castro, 12/06/2015 (written statement)
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Lauren Pinkus, 11/23/2015 (written statement)
Laurie Goldberger & Leslie Kogod, 12/18/2015 (written statement)
Laurie Sagalyn, 12/14/2015 (written statement)
Lawrence Grant, 12/04/2015 (written statement)
Leah Rose Jacobs, 12/18/2015 (written statement)
Leig Golterman, 12/04/2015 (written statement)

Leonard Quart, 12/18/2015 (written statement)
Lesley Slater, 12/14/2015 (written statement)
Leslie Hanson, 11/29/2015 (written statement)
Leslie Kriesel, 12/14/2015 (written statement)
Leslie Rupert, 11/27/2015 (written statement)
Lia De Feo, 11/28/2015 (written statement)
Linda Day, 12/06/2015 (written statement)
Linda Jones, 12/19/2015 (written statement)
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Lionel J-M Delevingne, 12/16/2015 (written statement)
Lisa Davis, 12/15/2015 (written statement)
Lisa Yee, 11/28/2015 (written statement)
Lise Brenner, 01/17/2016 (written statement)
liz Tuccillo, 12/14/2015 (written statement)
Liza Whiting, 11/29/2015 (written statement)
Lois Bodnick, 12/18/2015 (written statement)
Lori Malloy, 11/27/2015 (written statement)
Lou Strenger, 11/23/2015 (written statement)
Lucia Minervini, 12/17/2015 (written statement)
Lucy Koteen, 11/29/2015 (written statement)
Lucy Oakley, 12/14/2015 (written statement)
Lynne Luxton, 12/15/2015 (written statement)
M Clayton, 12/03/2015 (written statement)
Madge Rosenberg, 11/28/2015 (written statement)
Maegan Hayward, 11/23/2015 (written statement)
Mahlon Stewart, 12/18/2015 (written statement)
Malka Percal, 12/14/2015 (written statement)
Marc Levy, 12/15/2015 (written statement)
Marc Ribot, 01/12/2016 (written statement)
Marc Wallace, 12/03/2015 (written statement)
Margaret Azzoni, 12/18/2015 (written statement)
Margaret O'Connor, 12/14/2015 (written statement)
Margaretta Colt, 12/15/2015 (written statement)
Margot Niederland, 01/17/2016 (written statement)
Marguerite Filson, 12/16/2015 (written statement)
Marian Camery, 12/15/2015 (written statement)
Marianne Casey, 12/15/2015 (written statement)
Marie Sansone Taylor, 12/19/2015 (written statement)
Marilyn Bai, 12/15/2015 (written statement)
Marilyn McCarthy, 12/14/2015 (written statement)
Marilyn Sachar, 12/04/2015 (written statement)
Marina Adams, 01/12/2016 (written statement)
Marise Hausner, 01/12/2016 (written statement)
Marjorie Fuchs, 12/18/2015 (written statement)

Mark Weinbaum, 11/27/2015 (written statement)
Martha Cataldo, 12/04/2015 (written statement)
Martha Fiahkin, 12/03/2015 (written statement)
Martin Hutner, 12/14/2015 (written statement)
Mary Ann Fastook, 12/18/2015 (written statement)
Mary Ann Giorgio, 11/29/2015 (written statement)
Mary Anne Toman, 12/14/2015 (written statement)
Mary Clarke, 12/18/2015 (written statement)
Mary Cole, 01/13/2016 (written statement)
Mary Erra, 11/28/2015 (written statement)
Mary Horlick, 12/16/2015 (written statement)
Mary Myers, 12/14/2015 (written statement)
Mary R. Smith, 11/28/2015 (written statement)
Mary Vanderwoude, 12/14/2015 (written statement)
Mary Woods, 12/14/2015 (written statement)
Maureen Liquori, 12/15/2015 (written statement)
Max Yeston, 11/27/2015 (written statement)
Mel Mackler, 11/29/2015 (written statement)
Melissa Elstein, 11/23/2015 (written statement)
Michael Ashworth, 12/15/2015 (written statement)
Michael Certo, 12/14/2015 (written statement)
Michael Fisher, 11/23/2015 (written statement)
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Michael Susi, 12/10/2015 (written statement)
Michael Thrower, 12/16/2015 (written statement)
Michele Campo, 12/03/2015 (written statement)
Michele Matteini, 12/18/2015 (written statement)
Michelle Spinner, 12/18/2015 (written statement)
Millicent Roth, 12/18/2015 (written statement)
Mimi Miller, 12/14/2015 (written statement)
Mimi Smith, 12/17/2015 (written statement)
Mindy Aloff, 12/14/2015 (written statement)
Mitchell Grubler, 12/04/2015 (written statement)
Monica Beyer, 12/04/2015 (written statement)
Monica Panzani, 11/26/2015 (written statement)
Morris Gindi, 12/04/2015 (written statement)
Morris Kornbluth, 12/01/2015 (written statement)
Mosette Broderick, 12/04/2015 (written statement)
Ms F Seidenbaum, 11/22/2015 (written statement)
Ms Teriananda, 1/1/2016 (written statement)
Nancy Allerston & Erich Winkler
Nancy Chen, 12/19/2015 (written statement)
Nancy Funke, 12/09/2015 (written statement)
Nancy Giampietro, 12/15/2015 (written statement)
Nancy Hager, 12/14/2015 (written statement)
Nancy Kremisdorf, 12/22/2015 (written statement)

Nancy Lindow, 11/29/2015 (written statement)
Nancy McGraw, 11/29/2015 (written statement)
Naomi Schoenkin, 12/16/2015 (written statement)
Nenad Lovric, 12/18/2015 (written statement)
Nicholas Christopher, 12/14/2015 (written statement)
Nick & Nancy Giampietro, 12/14/2015 (written statement)
Nicole Mezydlo, 12/030/2015 (written statement)
Nikki Scheuer, 11/28/2015 (written statement)
Nina Chertoff, 12/14/2015 (written statement)
Nina Mojica, 12/19/2015 (written statement)
Pam Lessero, 11/24/2015 (written statement)
Paolo Alippi, 12/18/2015 (written statement)
Pat & Russ Bartels, 12/14/2015 (written statement)
Patricia Bellucci, 12/14/2015 (written statement)
Patricia Bernstein, 11/29/2015 (written statement)
Patricia Farrell, 12/14/2015 (written statement)
Patricia McCobb, 12/03/2015 (written statement)
Patricia Moynihan, 11/30/2015 (written statement)
Patricia Papalia, 12/17/2015 (written statement)
Paul Binnerts, 12/15/2015 (written statement)
Paul Groncki, 11/24/2015 (written statement)
Paul Handelman, 12/14/2015 (written statement)
Paul Piccone, 12/18/2015 (written statement),
Paul Weidner, 12/04/2015 (written statement)
Pauline Leveque, 11/24/2015 (written statement)
Pearl Russo, 12/04/2015 (written statement)
Penny Luedtke, 12/14/2015 (written statement)
Peter Brown, 11/24/2015 (written statement)
Peter Reuther, 12/13/2015 (written statement)
Peter Velez, 12/15/2015 (written statement)
Phyllis Cohl, 12/18/2015 (written statement)
Phyllis Eckhaus, 12/15/2015 (written statement)
R Kurshan, 12/14/2015 (written statement)
Rachel Brown, 11/27/2015 (written statement)
Rachel Gellman, 12/14/2015 (written statement)
Ralph Fri, 12/01/2015 (written statement)
Rebecca Lipski, 12/15/2015 (written statement)
Regina Cherry, 12/04/2015 (written statement)
Regina Joseph, 12/18/2015 (written statement)
Rena Uviller, 12/14/2015 (written statement)
Renee Lewis, 12/18/2015 (written statement)
Rhetta Barron, 11/30/2015 (written statement)
Rhoda Levine, 12/18/2015 (written statement)
Rhonda Mitron, 12/10/2015 (written statement)
Richard Broad, 12/18/2015 (written statement)
Richard Kayne, 11/24/2015 (written statement)
Richard Silverman, 12/04/2015 (written statement)

Richard Widmann, 11/27/2015 (written statement)
Richita Anderson, 12/18/2015 (written statement)
Ritu Chattree, 12/15/2015 (written statement)
Robert Bischoff, 12/14/2015 (written statement)
Robert Bononno, 11/29/2015 (written statement)
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Roger Erra, 11/28/2015 (written statement)
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Ron Ben Israel, 12/18/2015 (written statement)
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Ronnie Munder, 12/031/2015 (written statement)
Rosemary Aizer, 12/09/2015 (written statement)
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Ruby Packard, 12/16/2015 (written statement)
Russell Blount, 12/14/2015 (written statement)
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Sarah Apfel, 11/23/2015 (written statement)
Sarah Gallagher, 12/18/2015 (written statement)
Sarah Pope, 12/19/2015 (written statement)
Sarah Rosenblatt, 12/18/2015 (written statement)
Sarah Woodside Gallagher, 12/14/2015 (written statement)
Selim Saribeyoglu, 12/14/2015 (written statement)
Selwyn Garraway, 01/16/2016 (written statement)
Sharon Lukach, 11/27/2015 (written statement)
Sharry Lukach, 12/15/2015 (written statement)

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Sheila Strong, 12/15/2015 (written statement)
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Silvia Beam, 12/15/2015 (written statement)
Simon Thoresen, 12/14/2015 (written statement)
Stephanie Forman, 12/14/2015 (written statement)
Stephen Koch, 11/28/2015 (written statement)
Stephen Lyle, 12/03/2015 (written statement)
Stephen Mango, 12/18/2015 (written statement)
Steve Fried, 01/05/2016 (written statement)
Steven Barrison, 12/14/2015 (written statement)
Steven Clay & Julie Harrison, 12/03/2015 (written statement)
Steven Fox, 12/18/2015 (written statement)
Steven Godeke, 12/03/2015 (written statement)
Steven Terry, 11/27/2015 (written statement)
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Teresa Harris, 12/18/2015 (written statement)
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Terri Cook, 12/18/2015 (written statement)
Terri Howell, 11/23/2015 (written statement)
Terry Brennan, 11/28/2015 (written statement)
Thad Meyerriecks & Leslie Mason, 12/14/2015 (written statement)
Thomas A. Whitford, 12/02/2015 (written statement)
Tim Birchby, 12/14/2015 (written statement)
Tina Martino, 12/01/2015 (written statement)
Tom Binet, 01/14/2016 (written statement),

Tom Birchard, 12/14/2015 (written statement)
Tom Jennings, 12/18/2015 (written statement),
Tommy Shi, 12/18/2015 (written statement),
Tony Allicino, 11/24/2015 (written statement)
Valerie Heinonen, 12/13/2015 (written statement)
Valerie Sherman, 12/14/2015 (written statement)
Vanessa Maruskin, 11/29/2015 (written statement)
Venus Flores, 12/14/2015 (written statement)
Veronica Marino, 12/15/2015 (written statement)
Vicki & Robert Margolis, 12/14/2015 (written statement)
Victoria McMahon, 12/18/2015 (written statement),
Virginia Chang, 12/15/2015 (written statement)
Virginia Wallace, 12/03/2015 (written statement)
Vivian Weisner, 12/14/2015 (written statement)
Wen-chung & Yi-an Chou, 12/16/2015 (written statement)
William Breedlove, 11/29/2015 (written statement)
William Harrington, 12/18/2015 (written statement)
William McNally, 12/18/2015 (written statement),
William Sharfman, 01/16/2016 (written statement)
Zoe Mackler, 12/06/2015 (written statement)
Zoe Morsette, 1/16/2015 (written statement)

Stack Letter #2

From: [REDACTED]
To: [REDACTED]
Subject: I am writing to you today regarding my opposition to the ZOA proposal
Date: Tuesday, December 08, 2015 3:38:41 PM

Dear Carl Weisbrod,

This amendment as proposed, is a wholesale upzoning of all five boroughs. New York thrives because of the diversity of its neighborhoods, yet this proposal's approach will deal with each neighborhood as the same, with a one-size-fits-all approach. It arbitrarily raises height limits and diminishes yard requirements across the board according to a mathematical nicety, not based in the actual built fabric of our city's neighborhoods. This potential impact on these properties must be studied carefully before being executed. Contextual zones came to fruition after years of effort by community-driven, carefully examined, neighborhood-specific studies. A calculation of potential growth based on a model is not the same as actual development, especially when one considers the diversity of New York's built environment.

At this moment, the proposal incentivizes all development, without any guarantee that it will actually house New Yorkers who are rent-burdened. In fact, a point could be made that this might incentivize demolition of existing housing in order to replace it with new development utilizing the proposed as-of-right height limits. This could increase displacement while only adding more market-rate housing to the pool. Bigger buildings do not equal lower rents, if that were the case, West 57th Street would be Manhattan's newest neighborhood for the middle class.

There is also no explanation of how building higher will mandate construction of quality buildings like the examples in the proposal, as there are no guidelines guaranteeing better design, nor provisions for ensuring that new construction with IH have equal amenities, resulting in the proliferation of "poor doors" and "poor floors".

Finally, I ask that special attention be paid in the environmental review to the effects the proposed changes might have to designated landmark properties, as well as properties determined eligible for or included on the New York State or National Register of Historic Places (as is required by municipal and state law regardless). By raising the height limits and lessening the yard requirements to landmark properties, the development expectations are increased and the LPC is given the unenviable task of having to resist policy enacted by a sister city agency. This could result in hardship claims, legal challenges and undue pressures on the LPC to act outside of its own mission. With these concerns in mind, we feel that this proposal is myopic, hasty, and created without New Yorkers or their neighborhoods in mind and urge you to disapprove these text amendments.

Sincerely,
Aron Eisenpress

[REDACTED]

Stack 2: I Am Writing To You Today

Aaron Sosnick, 12/08/2015 (written statement)
Adele Islar, 12/08/2015 (written statement)
Alan Lebow, 12/16/2015 (written statement)
Alexis Ravitch, 12/09/2015 (written statement)
Alyssa Bishop, 12/15/2015 (written statement)
Amy Greer, 12/15/2015 (written statement)
Amy Stoller, 12/22/2015 (written statement)
Andi Burnett, 12/16/2015 (written statement)
Andrea Coyle, 12/15/2015 (written statement)
Anne Namm, 12/10/2015 (written statement)
Anton Marchuk, 12/09/2015 (written statement)
Aron Eisenpress, 12/08/2015 (written statement)
Barbara Johnson, 12/08/2015 (written statement)
Barbara Neuhaus, 12/15/2015 (written statement)
Barbara Offenbacher, 12/09/2015 (written statement)
Bob Diamond, 12/15/2015 (written statement)
Bob Gelber, 12/15/2015 (written statement)
C London, 12/16/2015 (written statement)
Carl Teitelbaum, 12/08/2015 (written statement)
Carlo Lamagna, 12/15/2015 (written statement)
Carolyn Waring, 12/10/2015 (written statement)
Charles Wittman, 12/08/2015 (written statement)
Cleo Goldfischer, 12/15/2015 (written statement)
Clyde Henriques, 12/16/2015 (written statement)
David Goodrich, 12/15/2015 (written statement)
David Levine, 12/08/2015 (written statement)
E.S, 12/09/2015 (written statement)
Edward Becker, 12/09/2015 (written statement)
Elizabeth Kissam, 12/08/2015 (written statement)
Emil Blank, 12/13/2015 (written statement)
Ethel Tyus, 12/15/2015 (written statement)
Gina Pollara, 12/16/2015 (written statement)
Gina Ross, 12/15/2015 (written statement)
Hal Bromm, 12/16/2015 (written statement)
Harry Bubbins, 12/08/2015 (written statement)
Henry Euler, 12/08/2015 (written statement)
Howard Charles Yourow, S.J.D., 12/14/2015 (written statement)
Jack Kamins, 12/10/2015 (written statement)
Jack La Torre, 12/08/2015 (written statement)
Jamie Jensen, 12/16/2015 (written statement)
Janie Williams, 12/17/2015 (written statement)
Jason Pollock, 12/15/2015 (written statement)
Jean Standish, 12/10/2015 (written statement)
joan kreiss, 12/08/2015 (written statement)
Joan Scholvin, 12/16/2015 (written statement)
Joy Rich, 12/09/2015 (written statement)

Juan Blanco, 12/08/2015 (written statement)
Julie M. Finch, 12/16/2015 (written statement)
Katherine Schoonover, 12/08/2015 (written statement)
Klaus Kirschbaum, 12/09/2015 (written statement)
Linda Mariano, 12/08/2015 (written statement)
Linda Scher, 12/09/2015 (written statement)
Linda Yowell, 12/16/2015 (written statement)
Lo Van Der Valk, 12/16/2015 (written statement)
Luberta Hansley, 12/13/2015 (written statement)
Lynn Ellsworth, 12/08/2015 (written statement)
Marilyn Appleberg, 12/08/2015 (written statement)
Mark Goldberg, 12/16/2015 (written statement)
Mary Ann Fastook, 12/15/2015 (written statement)
Mary Brown, 12/15/2015 (written statement)
Michele Campo, 12/15/2015 (written statement)
Mitchell Grubler, 12/15/2015 (written statement)
Nancy Koenigsberg, 12/22/2015 (written statement)
Naomi Drucker, 12/08/2015 (written statement)
Natalie Ferd, 12/10/2015 (written statement)
Newman Amy, 12/09/2015 (written statement)
Nina Chin, 12/09/2015 (written statement)
Nina Kandel, 12/08/2015 (written statement)
Nizjoni Granville, 12/16/2015 (written statement)
Penelope Bateau, 12/08/2015 (written statement)
Peter Hirsch, 12/08/2015 (written statement)
Raymond Vinciguerra, 12/08/2015 (written statement)
Rena Samin, 12/10/2015 (written statement)
Robert LaValva, 12/15/2015 (written statement)
Roberta Hershenson, 12/08/2015 (written statement)
Ruth Siekevitz, 12/09/2015 (written statement)
Saranne Durkacs, 12/15/2015 (written statement)
Shirley Zafirau, 12/15/2015 (written statement)
Sibyl Groff, 12/15/2015 (written statement)
Simeon Bankoff, 12/07/2015 (written statement)
Stephen Varone, 12/08/2015 (written statement)
Susan S Binger, 12/16/2015 (written statement)
Susan Hopper, 12/15/2015 (written statement)
Susan Paston, 12/15/2015 (written statement)
Suzanne Spellin, 12/15/2015 (written statement)
Suzanne Wray, 12/15/2015 (written statement)
Sylvia R. Hoisington, 12/08/2015 (written statement)
Terry Grace, 12/08/2015 (written statement)
Zack Winestine, 12/16/2015 (written statement)
Zella Jones, 12/15/2015 (written statement)

Stack Letter #3

From: [REDACTED]
To: [REDACTED]
Subject: Fw: Oppose the 'Zoning for Quality and Affordability' Plan
Date: Thursday, November 12, 2015 9:09:17 PM

----- Original Message -----

From: Hank Davies [REDACTED]
Sent: Thursday, November 12, 2015 05:13 PM
To: Carl Weisbrod (DCP)
Subject: Oppose the 'Zoning for Quality and Affordability' Plan

Dear Mr. Weisbrod:

The 'Zoning for Quality & Affordability' proposal now going through the public review process would unnecessarily weaken neighborhood zoning protections and significantly increase height limits for new some developments with little or no public benefit.

There is no reason for the city to encourage taller developments in residential neighborhoods that were specifically zoned to maintain certain contextual height limits. There is no justification for the proposed across-the-board height increases of 5-20 feet for new developments, as they offer no public benefit, would undo hard-fought-for height limits that in many cases were a compromise from those which communities sought, and would only serve to erode neighborhood character.

The proposed increased height limits for 'inclusionary' developments (80% market-rate, 20% 'affordable') are still up to 25 feet or 31% in R7-A and R7-A-equivalent zones and R8A and R8-A –equivalent zones-- a very significant jump. The city claims this will result in more developers opting into the inclusionary program, and including 20% affordable units in their developments rather than building strictly market-rate. But they have provided no data to prove this questionable argument. Some developers are currently opting into the program with the existing height limits. Those who do not typically cite factors other than height limits such as bureaucracy, economies of scale, the cost of the program, etc. as the reason for not opting in – factors which this plan would not change. Thus the plan will certainly result in taller developments, but it is unclear if it will result in a single additional unit of affordable housing being built as compared to what would be built with the existing height limits.

The plan still also allows developments which are largely market-rate to get the full height bonus for "senior affordable housing" with just a fraction of the development dedicated to that purpose. There is no reason to grant bonuses for "senior affordable housing" to developments which are anything but entirely senior affordable housing. And the plan would still eliminate current restrictions on building upon precious rear yard green space – space needed to maintain light, air, and help protect the environment – and gut sliver law protections.

I urge you to oppose the 'Zoning for Quality and Affordability' plan.

Hank Davies
[REDACTED]

**Stack 3: Oppose the 'Zoning for Quality and Affordability' Plan
Version 2**

Alex Roe, 11/16/2015 (written statement)
Alex Story, 11/16/2015 (written statement)
Alice Skiba, 11/02/2015 (written statement)
Andrew Safady, 11/02/2015 (written statement)
Christine Dugas, 11/02/2015 (written statement)
Constance Dondore, 11/02/2015 (written statement)
Craig Rosenberg, 11/02/2015 (written statement)
Cynthia Menkes, 11/02/2015 (written statement)
David hottenroth, 11/02/2015 (written statement)
David Marcus, 11/02/2015 (written statement)
Diane, 11/02/2015 (written statement)
Donna Raftery, 11/02/2015 (written statement)
Ed Grazda, 11/02/2015 (written statement)
Ellen Datlow, 11/10/2015 (written statement)
Els Phillips, 11/03/2015 (written statement)
Emil L Barbanel, 11/10/2015 (written statement)
Erich Winkler, 11/09/2015 (written statement)
Gayle Lennon, 11/02/2015 (written statement)
Giorgio Bovenzi, 11/02/2015 (written statement)
Greg Juedes , 11/02/2015 (written statement)
Hank Davies, 11/12/2015 (written statement)
Harriet Pitcoff, 11/04/2015 (written statement)
Isabelle Duchesne, 11/02/2015 (written statement)
Jana Adler, 11/02/2015 (written statement)
Jeff Goldstone, 11/04/2015 (written statement)
Jim McGuane, 11/02/2015 (written statement)
Joan Kalb, 11/17/2015 (written statement)
Joel Ruttem , 11/10/2015 (written statement)
John Doyle , 11/02/2015 (written statement)
John eMail, 11/02/2015 (written statement)
Jules Harris, 11/02/2015 (written statement)
Julia Herzberg, 11/02/2015 (written statement)
karen Dodds, 11/12/2015 (written statement)
Kate Puls , 11/08/2015 (written statement)
Katherine Schoonover, 11/16/2015 (written statement)
Kathleen Garrick, 11/17/2015 (written statement)
Kenneth Anderson, 11/16/2015 (written statement)
Kriti Siderakis, 11/08/2015 (written statement)
Laura Burdick, 11/04/2015 (written statement)
Laura Michael, 11/02/2015 (written statement)
Laurel Burr, 11/02/2015 (written statement)
Leonard Quart, 11/02/2015 (written statement)
Lilah Wise, 11/02/2015 (written statement)
Linda Day, 11/02/2015 (written statement)

Linda Franklin, 11/11/2015 (written statement)
Maggie Wells, 11/02/2015 (written statement)
Marc Levy, 11/02/2015 (written statement)
Margaret "Julie" Finch, 11/13/2015 (written statement)
Martha Fiahkin, 11/16/2015 (written statement)
Mary Elaine Monti, 11/02/2015 (written statement)
Michelle Reyes Landers, 11/02/2015 (written statement)
Monica Rittersporn, 11/16/2015 (written statement)
Nancy Kolbert, 11/02/2015 (written statement)
Nora Killoran, 11/11/2015 (written statement)
Patricia Papalia, 11/02/2015 (written statement)
Paul Rackow , 11/02/2015 (written statement)
Peter Petas, 11/02/2015 (written statement)
Regina Cherry, 11/16/2015 (written statement)
Renee Lewis, 11/02/2015 (written statement)
Rochelle Didier, 11/02/2015 (written statement)
Rosemary Goldford, 11/04/2015 (written statement)
Sarah Rosenblatt, 11/02/2015 (written statement)
Sheila Rothgart, 11/02/2015 (written statement)
Sid & Eve Cholmar, 11/02/2015 (written statement)
Stephen Mango, 11/04/2015 (written statement)
Steve Farrugia, 11/02/2015 (written statement)
Steven Yee, 11/17/2015 (written statement)

Stack Letter #4

From: [REDACTED]
To: [REDACTED]
Subject: FW: Save Our Neighborhood Zoning Protections
Date: Saturday, October 10, 2015 3:34:25 PM

-----Original Message-----

From: Joseph Dolice [REDACTED]
Sent: Friday, October 09, 2015 5:52 PM
To: Carl Weisbrod (DCP)
Subject: Save Our Neighborhood Zoning Protections

Dear Mr. Weisbrod:

While the recent revisions to the city's 'Zoning for Quality and Affordability' plan are a step in the right direction, the revised plan would still unnecessarily weaken neighborhood zoning protections and significantly increase height limits for new some developments with little or no public benefit.

While it is good that some of the proposed increases in height limits for market-rate developments have been eliminated or reduced in the revised plan, many still remain in place. There is no reason for the city to encourage taller developments in residential neighborhoods that were specifically zoned to maintain certain contextual height limits.

The proposed increased height limits for 'inclusionary' developments (80% market-rate, 20% 'affordable') are still up to 31% in R7-A and R7-A-equivalent zones -- a very significant jump. The city claims this will result in more developers opting into the inclusionary program, and including 20% affordable units in their developments rather than building strictly market-rate. But they have provided no data to prove this questionable argument. Some developers are currently opting into the program with the existing height limits. Those who do not typically cite factors other than height limits such as bureaucracy, economies of scale, the cost of the program, etc. as the reason for not opting in -- factors which this plan would not change. Thus the plan will certainly result in taller developments, but it is unclear if it will result in a single additional unit of affordable housing being built as compared to what would be built with the existing height limits.

Finally, the plan still allows developments which are largely market-rate to get the full height bonus for "senior affordable housing" with just a fraction of the development dedicated to that purpose. There is no reason to grant bonuses for "senior affordable housing" to developments which are anything but entirely senior affordable housing. And the plan would still eliminate current restrictions on building upon precious rear yard green space -- space needed to maintain light, air, and help protect the environment.

Joseph Dolice

[REDACTED]

Stack 4: Save Our Neighborhood Zoning Protections

Ana Sani, 10/13/2015 (written statement)
Andrea Stempel, 10/09/2015 (written statement)
Ann & Donald Becker, 10/09/2015 (written statement)
Ann Lee, 10/11/2015 (written statement)
Anne Mitcheltree, 10/11/2015 (written statement)
Carole Mavity, 11/11/2015 (written statement)
Cynthia Penney, 10/12/2015 (written statement)
Dale Van Dyke, 10/09/2015 (written statement)
Donna Wingate, 10/11/2015 (written statement)
Douglas Collura, 10/09/2015 (written statement)
Edmund Dunn, 10/10/2015 (written statement)
Edward Butler, 10/09/2015 (written statement)
Gayle Lennon, 10/09/2015 (written statement)
Greg Juedes, 10/09/2015 (written statement)
Ian Wise & Susan Paston, 10/09/2015 (written statement)
Irving Mintz, 10/10/2015 (written statement)
J Ash, 10/10/2015 (written statement)
James Power, 10/10/2015 (written statement)
Jason Hammonds, 10/10/2015 (written statement)
Jean Standish, 10/11/2015 (written statement)
Jill Rapaport, 10/10/2015 (written statement)
John Doyle, 10/09/2015 (written statement)
Joseph Dolice, 10/09/2015 (written statement)
Josh Rabinowitz, 10/11/2015 (written statement)
Judy Washington Square Hotel, 10/09/2015 (written statement)
Kevin Rose, 10/10/2015 (written statement)
Leah Milstein, 10/11/2015 (written statement)
Mary Petretti, 10/16/2015 (written statement)
Nick Marden, 10/11/2015 (written statement)
Paolo Alippi, 10/09/2015 (written statement)
Penny Rand, 10/11/2015 (written statement)
Rhoda Levine, 10/09/2015 (written statement)
Robert Giusti, 10/13/2015 (written statement)
Rochelle Didier, M.D., 10/11/2015 (written statement)
Rosemary Bella, 10/16/2015 (written statement)
S Rak, 10/11/2015 (written statement)
Samantha Kleinfield, 10/10/2015 (written statement)
Sarah Gallagher, 10/15/2015 (written statement)
Shawn Chittle, 10/10/2015 (written statement)
Tena Watt, 10/09/2015 (written statement)

Stack Letter #5

OFFICE OF THE
CHAIRPERSON

Nov 02 2015

28886

City Planning Commission
22 Reade Street
New York, New York 10007-1216
Carl Weisbrod - Director

Dear Director Weisbrod

October 2015

The Mayor's *Housing Proposal for zoning for quality and affordability* does not provide any planning it just adds housing and changes some zoning to accomplish this. Each neighborhood is different and has its own needs, new housing is not always the answer. Before any housing is built, infrastructure must first be considered, addressed and improved. Electric, Gas, Water and Sewer Service must be up graded to accommodate additional housing. New Schools and Library's must be built. Existing Police and Fire Departments must be expanded to accommodate additional people. Zero lot building must be addressed and corrected so that any new building could not encroach and or damage an existing older home.

The Mayor wants to eliminate what he calls "*unnecessary parking*." There is no such thing as unnecessary parking in New York City. We have been fighting for a long time to increase parking requirements especially in zoning where large multiple family apartment buildings are allowed. Parking requirements must be increased from 50% to at least 100% or more per apartment building for all housing types and there must be no loopholes that would allow a builder to decrease parking availability, whether it is for senior housing or any other type of housing. Additionally, every shopping district in every borough needs more parking both today and in the future. Also, every train station, school, police and fire station needs parking for employees and visitors. The quantity of cars will only increase in the future.

We do agree that we need senior housing and assisted living housing. We also need to allow the senior's to stay in their own neighborhood, where their families live, have access to stores, people that they are familiar with, doctors that know them and in general a community that they chose to live in. *The New York City Housing Authority* will assign a senior applying for an apartment to any apartment in the borough without regard for the applicant's needs and preferences. Further, if they refuse two apartments in any unacceptable neighborhood they are taken off the list they have waited on for more than 5 years. This policy must change. The needs of our seniors must come first.

We are asking for the help of your office to stop widespread changes and to fix the problems of our neighborhoods first before adding more housing.

Sincerely,



Stack 5: Additional Form Letter

Raffaele Esposito 10/2015 (written statement)

Richard Guarnieri , 10/2015 (written statement)

VJ Parapugna, 10/2015 (written statement)

Saverio Parapugna, 10/2015 (written statement)

Patricia Zippo, 10/8/2015 (written statement)

Stack Letter #6

From: [REDACTED]
To: [REDACTED]
Subject: Save Our Neighborhoods Now!
Date: Friday, January 08, 2016 12:00:21 PM

Dear Mr. Weisbrod:

I am deeply concerned about plans by the city to strip neighborhood zoning protections and encourage overdevelopment while refusing to move ahead with needed protections for our neighborhood.

I strongly oppose provisions in the proposed 'Zoning for Quality and Affordability' text amendment which would lift existing height limits for new development in residential neighborhoods. Such changes would not improve quality or affordability, but would simply result in larger, more out-of-scale development.

I strongly oppose making affordable housing requirements solely dependent upon large-scale upzonings that would not only make neighborhoods less affordable by vastly increasing the amount of allowable market-rate development but would also destroy neighborhood scale and character, as currently proposed.

I strongly oppose allowing "air rights" transfers from the Hudson River Park to allow massively increased size and scale of allowable development in our neighborhood, when alternatives exist for funding the Hudson River Park, no accounting has yet been provided for the total number of "air rights" within the Park which could still be transferred, and much-needed neighborhood rezonings for the South Village and University Place/Broadway corridors continue to languish. These rezoning proposals by the Greenwich Village Society for Historic Preservation have strong support from the affected communities, local elected officials, and the respective Community Board. Only the City is refusing to act upon them, though they would put in place reasonable limits on new development and incentivize the creation or retention of affordable housing – a supposed priority of this administration.

I urge you not to support provisions which would undo hard-fought-for zoning protections and contribute to overdevelopment, and to support long-overdue protections for our neighborhood where 300 ft. tall towers are currently allowed and being built.

Steven Taras

[REDACTED]

Stack 6: Save Our Neighborhoods Now!

A. May, 1/16/2016, (written statement)
A. S. Evans, 1/15/2016, (written statement)
Abraham Bloch, 1/15/2016, (written statement)
Alexandra Elson, 1/16/2016, (written statement)
Alexis Tirado, 1/3/2016, (written statement)
Alfred Durante, 1/15/2016, (written statement)
Alice Brody, 1/15/2016, (written statement)
Amy Brenna, 1/15/2016, (written statement)
Amy Gilfenbaum, 1/15/2016, (written statement)
Ana Meier, 1/15/2016, (written statement)
Andrew Willow, 12/31/2015, written statement
Angela Manno, 1/20/2016 (written statement)
Ann Burgunder, 1/6/2016, (written statement)
Ann Weintraub, 1/15/2016, (written statement)
Ann Weintraub, 1/5/2016, (written statement)
Annabel Beatty, 1/17/2016 (written statement)
Anne Marie Paolucci, 1/15/2016, (written statement)
Anne Martin, 1/15/2016, (written statement)
Anne Taylor Davis Millstein, 1/15/2016, (written statement)
Anne Wagley, 1/15/2016, (written statement)
Annette Fesi, 1/1/2016, (written statement)
Annette Vermandel, 1/10/2016, (written statement)
Annette Zaner, 1/17/2016 (written statement)
Aria Sloss, 1/15/2016, (written statement)
Arlene mehlman, 1/15/2016, (written statement)
Art Bailey, 1/10/2016, (written statement)
Audrey Bernstein, 1/15/2016, (written statement)
Barbara Baluta, 1/21/2016 (written statement)
Barbara Miller, 1/15/2016, (written statement)
Barney Freeman, 1/4/2016, (written statement)
Barney Freeman, 1/4/2016, (written statement)
Becki Danchik, 1/15/2016, (written statement)
Bernice Tsai 1/19/2016 (written statement)
Bonnie Rosenstock, 1/15/2016, (written statement)
Bradford Roaman, 1/18/2016 (written statement)
Bree Rubin, 1/15/2016, (written statement)
Bruce Ebnother, 1/18/2016 (written statement)
Bruce Kayton, 1/15/2016, (written statement)
Carlo Lamagna, 1/15/2016, (written statement)
Carlos Anllo, 1/17/2016 (writtent statement)
Carmen Hendershott, 1/15/2016, (written statement)
Carol Belsky, 1/18/2016 (written statement)
Carol Wilson, 1/16/2016, (written statement)
carole teller, 1/15/2016, (written statement)

Caroline Oyama, 1/15/2016, (written statement)
Charles Bell, 1/18/2016 (written statement)
Christine Dugas, 1/15/2016, (written statement)
Christine Hadlow, 1/15/2016, (written statement)
Christopher McLallen, 1/4/2016, (written statement)
Clharies Brainard 1/3/2016, (written statement)
Clover Vail, 1/16/2016 (written statement)
Constance Ellis, 1/5/2016, (written statement)
Craig Kuehl, 1/15/2016, (written statement)
Cynthia Garnant, 1/15/2016, (written statement)
Cynthia Penney, 1/15/2016, (written statement)
Daivd Glover, 1/21/2016 (written statement)
Dale & Norman Kahn, 1/15/2016, (written statement)
Dale Van Dyke, 1/17/2016 (written statement)
Dan Bloom, 1/20/2016 (written statement)
Danny Voloch, 12/29/2016, (written statement)
david glover, 1/21/2016, (written statement)
David Marcus, 1/17/2016 (writtent statement)
David Rosenberg, 1/9/2016, (written statement)
David Stenn, 1/1/2016, (written statement)
deborah friedman, 1/15/2016, (written statement)
deborah lyons, 1/16/2016, (written statement)
Deley Gazinelli, 1/15/2016, (written statement)
Denis Forster, 1/15/2016, (written statement)
Denise Roberts, 1/15/2016, (written statement)
Dennis Rosenstein, 1/15/2016, (written statement)
Devorah Carduner, 12/31/2016, (written statement)
Diana Boernstein, 12/31/2016, (written statement)
Don Bigioni, 1/16/2016, (written statement)
Donald Becker, 1/15/2016, (written statement)
Donna Mastrandrea 1/19/2016 (written statement)
Doug Kaden, 1/20/2016 (written statement)
DR KENNETH L. CACCAVALE, MD, 1/14/2016, (written statement)
Dr Michael Garfinkle, 1/15/2016, (written statement)
Dr. Ann Bleefeld, 1/15/2016, (written statement)
Drake Tempest, 1/15/2016, (written statement)
Ed Grazda, 1/15/2016, (written statement)
Edmond Hamilton, 1/15/2016, (written statement)
Elaine Niedoroda, 1/3/2016, (written statement)
Eleanor Swezey, 1/14/2016, (written statement)
Elide Manente, 1/18/2016 (written statement)
Elisa Monte, 1/17/2016 (written statement)
Elisabeth Karetzky, 1/15/2016, (written statement)
Elise A Tollner, 1/16/2016 (written statement)
Elizabeth Bonapfel, 1/15/2016, (written statement)
Elizabeth Capelle, 1/15/2016, (written statement)
Elizabeth Dworkin, 1/15/2016, (written statement)

Ellen Datlow, 1/15/2016, (written statement)
ellen kenigsberg, 1/15/2016, (written statement)
Ellen Wachtel, 1/15/2016, (written statement)
els phillips, 1/15/2016, (written statement)
Emilie Dishongh 12/31/2015, (written statement)
er levy, 1/15/2016, (written statement)
Eric Myers, 1/9/2016, (written statement)
Eric Rayman, 1/16/2016, (written statement)
Eric Zinn, 1/15/2016, (written statement)
erich winkler, 1/16/2016, (written statement)
Eron Roland, 1/15/2016, (written statement)
Eve Sicular, 1/10/2016, (written statement)
Farley Pennington, 1/5/2016, (written statement)
frances siegel, 1/16/2016, (written statement)
Francis Xavier, 1/15/2016, (written statement)
Gabriel Veridze, 1/15/2016, (written statement)
Gary Tomei, 1/15/2016, (written statement)
Gayle Lennon, 1/15/2016, (written statement)
Genata Carol, 1/15/2016, (written statement)
Genata Carol, 1/15/2016, (written statement)
Genata Carol, 1/9/2016, (written statement)
Gene Shirey, 1/10/2016, (written statement)
Geoffrey Hendricks, 1/15/2016, (written statement)
George Calderaro, 1/15/2016, (written statement)
Georgia Deoudes, 1/5/2016, (written statement)
Gina D"Angelo 1/18/2016 (written statement)
Greg Juedes, 1/15/2016, (written statement)
Greg Juedes, 1/15/2016, (written statement)
Gregory Spock, 1/15/2016, (written statement)
Harold Appel, 1/15/2016, (written statement)
Harry Bubbins, 1/15/2016, (written statement)
heide kahme, 1/16/2016, (written statement)
HOWARD BARASH, 1/9/2016, (written statement)
Hubert Steed, 1/2/2016, (written statement)
Ilene Budin, 1/15/2016, (written statement)
Ira Kantor, 1/15/2016, (written statement)
IRVING MINTZ, 1/15/2016, (written statement)
Jack Barth, 1/15/2016, (written statement)
Jack Intrator, 1/20/2016 (written statement)
Jacommo Greco, 1/16/2016, (written statement)
James Brown, 1/20/2016 (written statement)
James Walker, 1/15/2016, (written statement)
James Wesolowski, 1/15/2016, (written statement)
Jamie Jensen, 1/15/2016, (written statement)
Janet Duran, 1/15/2016, (written statement)
Jared Brenner, 1/15/2016, (written statement)
Jean Standish, 1/15/2016, (written statement)

Jeanne Krier, 1/15/2016, (written statement)
Jeanne Nicolosi, 1/15/2016, (written statement)
Jeff Caltabiano, 1/18/2016 (written statement)
Jennifer Marshall, 1/15/2016, (written statement)
Jenny Goldsmith, 1/15/2016, (written statement)
Jessica Hosey, 1/20/2016 (written statement)
Jill Rapaport, 1/15/2016, (written statement)
Jim McGuane, 1/16/2016, (written statement)
Joan Klyhn, 1/15/2016, (written statement)
Joan Piekny, 1/15/2016, (written statement)
Joan Reilly, 1/15/2016, (written statement)
Joanne Mantell, 1/16/2016, (written statement)
Joe Dolice, 1/15/2016, (written statement)
joel rutten, 1/15/2016, (written statement)
John Doyle, 1/15/2016, (written statement)
John H Wilson, 1/15/2016, (written statement)
John Saffron, 1/15/2016, (written statement)
Jon Verbalis, 1/17/2016 (written statement)
Joseph Mastrandrea, 1/15/2016, (written statement)
Joseph Moskal, 1/4/2016, (written statement)
Joy Cytryn, 1/15/2016, (written statement)
Joyce Mendelsohn, 1/15/2016, (written statement)
Judith Laughren, 1/17/2016 (written statement)
Judith Patrusky, 1/6/2016, (written statement)
Judith Patrusky, 1/6/2016, (written statement)
Judy Eeling, 1/15/2016, (written statement)
Judy Lupman Shechter, 1/15/2016, (written statement)
Judy Washington Square Hotel, 1/15/2016, (written statement)
Jules La Rosa, 1/15/2016, (written statement)
Julianne Bond, 1/20/2016 (written statement)
Julie Kennedy, 1/15/2016, (written statement)
Karen Jaroneski, 1/15/2016, (written statement)
Karen Schifano, 1/16/2016, (written statement)
Karin Cudd, 1/18/2016 (written statement)
Karin Wolfe, 1/15/2016, (written statement)
Katherine Lopez, 1/12/2016, (written statement)
Kathie Lou Moser, 1/9/2016, (written statement)
Kathleen Adams, 1/15/2016, (written statement)
Kathleen Brown, 1/15/2016, (written statement)
Kathleen Matthews 1/20/2016 (written statement)
Kathy Bierman, 1/16/2016, (written statement)
Kelly Martindale, 1/9/2016, (written statement)
Ken Wehr, 1/15/2016, (written statement)
Kendall Cornell, 1/3/2016, (written statement)
Kenneth Anderson, 1/15/2016, (written statement)
Kim Carson, 1/15/2016, (written statement)
Kim Carson, 1/4/2016, (written statement)

Kwoklai Fan, 1/9/2016, (written statement)
Laraine Bengis, 1/12/2016, (written statement)
Laraine Kravitz, 1/15/2016, (written statement)
Laura Castro, 1/15/2016, (written statement)
Laurie Goldberger & Leslie Kogod, 1/17/2016 (written statement)
Lawrence Grant, 1/15/2016, (written statement)
Leah Rose Jacobs, 1/15/2016, (written statement)
Leila Mustachi, 1/15/2016, (written statement)
Leonard Quart, 1/15/2016, (written statement)
Leslie Kriesel, 1/15/2016, (written statement)
Lester Mantell, 1/16/2016, (written statement)
Linda Day, 1/16/2016, (written statement)
LINDA LAGRECA, 1/2/2016, (written statement)
Linda Zecchino, 1/15/2016, (written statement)
Linda Zecchino, 1/5/2016, (written statement)
Lionel J-M Delevingne, 1/18/2016 (written statement)
Lisa Bateman, 1/16/2016, (written statement)
Lise Brenner, 1/15/2016, (written statement)
Lucy Oakley, 1/15/2016, (written statement)
Lynn Rakos, 1/14/2016, (written statement)
Lynne Kanter, 1/15/2016, (written statement)
Lynne Luxton, 1/21/2016 (written statement)
M Clayton, 1/16/2016, (written statement)
M Marin, 1/16/2016, (written statement)
Marc Levy, 1/16/2016, (written statement)
Margaret Azzoni, 1/16/2016, (written statement)
Margaret O'Connor, 1/15/2016, (written statement)
MARIA DASILCA, 1/16/2016, (written statement)
marialena giampino, 1/15/2016, (written statement)
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Marie Sansone Taylor, 1/15/2016, (written statement)
Marilyn Bai, 1/19/2016 (written statement)
Marilyn Sachar, 1/17/2016 (writtent statement)
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mark koppel, 1/16/2016, (written statement)
Mark Koppel, 1/17/2016 (written statement)
Martha Armas 1/18/2016 (written statement)
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Martha Danziger, 1/16/2016, (written statement)
Martin Hutner, 1/15/2016, (written statement)
Mary Anne Toman, 1/15/2016, (written statement)
Mary Elaine Monti, 1/16/2016, (written statement)
Mary Juedes, 1/15/2016, (written statement)
Mary Vanderwoude, 1/16/2016, (written statement)
Marya Zimmet, 1/4/2016, (written statement)
Marydene Davis, 1/15/2016, (written statement)
Matt Allison, 1/15/2016, (written statement)

Max Yeston, 1/15/2016, (written statement)
Meredith Rose, 1/14/2016, (written statement)
Mia Ting, 1/15/2016, (written statement)
Michael Blake, 1/3/2016, (written statement)
Miguel Banuelos, 12/31/2015 (written statement)
Miles Groth, 1/15/2016, (written statement)
Mitchell Grubler, 1/15/2016, (written statement)
Mitsi I, 1/11/2016, (written statement)
Ms F Seidenbaum, 1/13/2016, (written statement)
Ms Teriananda, 1/16/2016, (written statement)
Myra Malkin, 1/15/2016, (written statement)
Nancy Chen, 1/16/2016, (written statement)
Nenad Lovric, 1/15/2016, (written statement)
Nick & Nancy Giampietro, 1/15/2016, (written statement)
Nina Reznick, 1/15/2016, (written statement)
Norman Laurila, 1/15/2016, (written statement)
Pablo O Garcia, 1/16/2016, (written statement)
Paolo Alippi, 1/18/2016 (written statement)
Patricia Bellucci 1/19/2016 (written statement)
Patricia Farrell, 1/15/2016, (written statement)
patricia papalia, 1/15/2016, (written statement)
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Patricia Storace, 1/15/2016, (written statement)
Patrick Pachod, 1/16/2016, (written statement)
Penny Barbera, 1/9/2016, (written statement)
Peter Shapiro, 1/15/2016, (written statement)
Phyllis Cohl, 1/15/2016, (written statement)
Prinny Alavi, 1/15/2016, (written statement)
R Kurshan, 1/15/2016, (written statement)
R. Scott Golden, 1/15/2016, (written statement)
rachel gellman, 1/15/2016, (written statement)
RAchel Weiss, 1/11/2016, (written statement)
Ralph Gurkin, 1/15/2016, (written statement)
Rebecca & Bruce Bent II, 1/15/2016, (written statement)
Rebecca Lipski, 1/16/2016, (written statement)
Regina Joseph, 1/15/2016, (written statement)
Renee Barkan, 1/15/2016, (written statement)
Renee Lewis, 1/15/2016, (written statement)
Rhoda Levine, 1/15/2016, (written statement)
Risa Mickenberg, 1/15/2016, (written statement)
Rita Fischer, 1/16/2016, (written statement)
Robert Gelber, 1/15/2016, (written statement)
Robert Giusti, 1/15/2016, (written statement)
Robert Schatz, 1/4/2016, (written statement)
Rochelle Didier, M.D., 1/15/2016, (written statement)
Rochelle Gurstein, 1/15/2016, (written statement)
Ruth Osborne 1/19/2016 (written statement)

S kaufman, 1/10/2016, (written statement)
sally young, 1/15/2016, (written statement)
Sally Young, 1/17/2016 (writtent statement)
Sarah Craft, 1/16/2016 (written statement)
Sarah Gallagher, 1/15/2016, (written statement)
Sarah Hoover, 1/15/2016, (written statement)
Sarah Rosenblatt, 1/15/2016, (written statement)
Shabot Jacqueline, 1/15/2016, (written statement)
Sharry Lukach, 1/18/2016 (written statement)
Sheila Browning, 1/15/2016, (written statement)
Simon Thoresen, 1/15/2016, (written statement)
Stanley Sklar, 1/15/2016, (written statement)
Stephen Lyle, 1/3/2016, (written statement)
Stephen Mango, 1/15/2016, (written statement)
Stephen Mango, 1/15/2016, (written statement)
steve fried, 1/15/2016, (written statement)
Steve Swell, 1/19/2016 (written statement)
Steven Taras, 1/15/2016, (written statement)
Steven Taras, 1/8/16 (written statement)
Steven Taras, 1/9/2016, (written statement)
Suresh Dianand,1/16/2016, (written statement)
SUSAN BENEDETTO, 1/9/2016, (written statement)
Susan Bloom, 1/5/2016, (written statement)
Susan Rosengarten, 1/15/2016, (written statement)
Susan Schindler, 12/31/2016, (written statement)
Suzanne Dickerson, 1/15/2016, (written statement)
Suzanne Goodelman, 1/15/2016, (written statement)
Sylvia Rackow, 1/16/2016, (written statement)
Tena Watt, 1/16/2016, (written statement)
TERESA O'CONNOR, 1/15/2016, (written statement)
Terese Svoboda, 1/2/2016, (written statement)
Terese Svoboda, 1/2/2016, (written statement)
Terri Howell, 1/15/2016, (written statement)
THOM FOGARTY, 1/15/2016, (written statement)
Thomas McCormack, 1/5/2016, (written statement)
Thomas Trengove, 1/20/2016 (written statement)
Timothy Leonard, 1/6/2016, (written statement)
Tom Burckhardt, 1/15/2016, (written statement)
Tom Fontana, 1/7/2016, (written statement)
Tom Jennings, 1/15/2016, (written statement)
Tommy Shi, 1/15/2016, (written statement)
Tony Allicino, 1/15/2016, (written statement)
Vincent Cotugno, 1/2/2016, (written statement)
Vivian Weisner, 1/15/2016, (written statement)
Zack Winestine, 1/16/2016, (written statement)
Zoe Stark, 1/11/2016, (written statement)

PETITION AGAINST NEW ZONING PROPOSAL

**To: Mayor Bill deBlasio,
Council Speaker Melissa Mark-Viverito,
The New York City Council,
The New York City Department of City Planning,
Queens Borough President Melinda Katz,
Local Elected Leaders,
Community Boards 7 and 11
Queens Civic Congress:**

The undersigned opposes the passing of Mayor deBlasio's proposal "Zoning for Quality and Affordability". Although I/we understand the need for affordable and senior housing in our city, I/we oppose a proposal that will sacrifice many of the gains that have been made through our rezonings over the years that help protect our communities from overdevelopment and inappropriate development. The plan calls for taller and bulkier building construction in certain zoning districts and the reduction or elimination of parking requirements for new senior housing in many areas across the city. Other changes are proposed as well that will negate the progress that we have made. This proposal is going in the opposite direction of what we have fought for in our communities. The public, including concerned individual citizens, community boards, civic associations and other community groups, must be listened to and given an opportunity to contribute input into any proposal that will affect our communities. The Mayor's current proposal should not be enacted.

Signature #1: _____

Print Name: _____

Louis J. Troisi

Signature #2: _____

Print Name: _____

Address: _____

Date: _____

Additional Comments (if any): _____

Stack 7: Petition Against New Zoning Proposal

Alba and Mario Pezzina, 9/11/15, written statement
Alexander DiPaulo, 9/8/15, written statement
Alfred and Isocde Ziegler, 9/9/15, written statement
Amy and George Burns, 9/20/15, written statement
Angela Soccoli, 9/14/15, written statement
Anne L. Sanitate, 9/10/15, written statement
Anthony and Lisa Koutsouradis, 9/9/15, written statement
Arthur and Linda Kramer, 9/29/15, written statement
Athanasios and Frideriki Pappas, 9/19/15, written statement
Audren and Kathleen Ziegler, 9/8/15, written statement
Barbara A Saccardi, 9/8/15, written statement
Barbara A. Amberg, 9/22/15, written statement
Barbara and Paul Errico, 9/10/15, written statement
Barbara Devito and Charles Ortolani, 9/11/15, written statement
Barbara Nasewicz, 9/8/15, written statement
C. Stanisci and A. Stanisci, 9/8/15, written statement
Cahterine Angelopoulos and Bessre Giordano, 9/1/15, written statement
Caralie and Ira Hafkin, 9/12/15, written statement
Carlo Perrone, 9/12/15, written statement
Carol and Rober DeMarco, 9/10/15, written statement
Carolyn and Joseph Vitale, 9/10/15, written statement
Catherine Venis and Stephen Aleksey, 9/8/15, written statement
Charles and Barbara Penko, 9/13/15, written statement
Charles and Elisa Taibi, 9/9/15, written statement
Charles and Rose Marie Capeau, 9/9/15, written statement
Christina Scherer, 9/15/15, written statement
Christine and Michael Patrizzo, 9/12/15, written statement
Christopher and Karnen DeMeo, 9/14/15, written statement
Cliff and Mary Mosco, 9/9/15, written statement
Concetta and Eva Karosos, 9/14/15, written statement
Connie Thorsen, 9/9/15, written statement
Dario and Catherine Grdovic, 9/9/15, written statement
Debra Rossi and Krystals Andalvz, 9/25/15, written statement
Diane and Colette Sadallah, 9/20/15, written statement
Donna and Bill McCernon ,9/8/15, written statement
Doris and Judith Casazza, 9/17/15, written statement
Eda Santorelli, 9/9/15, written statement
Edith and John Pauymari, 10/14/15, written statement
Edqard and Janet DeNicola, No date, written statement
Edward and Marie Sapanaro, 9/15/15, written statement
Eileen and Arthur taylor, 9/9/15, written statement
Eileen Woods, 9/9/15, written statement
Elaine Gelardi and Marian Maysa, 9/8/15 , written statement
Elaine Reilly, 9/8/15, written statement

Elizabeth and Jerry Viscovich, 9/11/15, written statement
Ellen A. Schiavone, 9/15/15, written statement
Elliott Bentman, 9/16/15, written statement
Esther and Anthony Cimitile, 9/12/15, written statement
Evelyn Degmayr, 9/8/15, written statement
Fabiola Nadjar Fione, 9/15/15, written statement
Frank and Kim Ventura, 9/10/15, written statement
Gary and Katie Hsu, 9/10/15, written statement
Gary Hartz and Mayanne Hartz, 9/10/15, written statement
George Donahue and Mary J. Donahue, 9/10/15, written statement
George Glowacky, 9/28/15, written statement
Gerard and Joyce Matheson, 9/19/15, written statement
Grace Cosentino, 9/18/15, written statement
Gusso Graffeo, 9/18/15, written statement
Gwendolyn and Nunzio Vulpio, 9/9/15, written statement
Harry and Winifred Lavin, 9/14/15, written statement
Henrey Trdue, 9/10/15, written statement
Henry Gralton, 9/15/15, written statement
Ignatius and Patricia Evans, 9/8/15, written statement
Irene and Bryon Dresuer, 9/8/15, written statement
Jack and Jacquelyn Soulier, 9/15/15, written statement
James and Norah McCann, 9/22/15, written statement
Janet and Carlos Rubiano, 9/18/15, written statement
Jayne and John Capozzi, 9/9/15, written statement
Jean Merolla, 9/8/15, written statement
Jeanine and Joseph Cognurd, 9/14/15, written statement
Jeroma Carubia, 9/17/15, written statement
Joan Alexander and Lucy Girard, 9/16/15, written statement
Joan and Dominico Menduni, 9/10/15 , written statement
Joan and Gayle Heubish, no date , written statement
Joan Jaworski, 9/11/15, written statement
Joann and Fred Kelty, 9/14/15, written statement
Johannar and John Havreluk, 9/9/15, written statement
John and Philomena Leadwith, 9/9/15, written statement
John and Sophia Xidias, 9/14/15, written statement
John and Susan Schwemmer, 9/11/15, written statement
John Mastando, Jr. and Phyllis Mastando, 9/10/15, written statement
John Vigliarolo and Donna Barraglia, 9/19/15, written statement
Joseph and Audrey Swantek, 9/11/15, written statement
Joseph and Catherine Brigante, 9/10/15 , written statement
Joseph and Elaine Caruso, 9/8/15, written statement
Joseph and Kathleen Bracatu, 10/14/15, written statement
Josephine Barcella, 9/13/15, written statement
Judy and Edward Norrby, 9/16/15, written statement
Karen and John Biehner, 9/8/15, written statement
Laureen Eidt, 9/15/15, written statement
Laurel Thomas, 9/9/15, written statement

Lenny Favata and Joan McCosker, 9/23/15, written statement
Lewbre Hanan, 10/20/15, written statement
Linda and Karen Lieu ,9/10/15, written statement
Linda Diez, 9/12/15, written statement
Lorraine and Jesse Minelli, 9/17/15, written statement
Louis A. Fico, 9/8/15, written statement
Louis and Connie DeMartino, 9/8/15, written statement
Louis Shenker, 9/28/15, written statement
Louis Troisi, no date, written statement
Margaret Cirinionce, 9/9/15, written statement
Margaret Rappold, 9/16/15, written statement
Maria and Jean Le Gall ,9/10/15, written statement
Maria and Louis Santacesa, 9/10/15, written statement
Maria Costanzo, 9/9/15, written statement
Marie Russo, 9/10/15, written statement
Martin and Patricia Munch, 9/10/15, written statement
Martin Carey and Catherine Carey, 9/16/15, written statement
Mary and Benedict Keenan, 9/25/15, written statement
Mary and Orazio Caldarella, 9/27/15, written statement
Mary Sauds, 9/9/15, written statement
MaryAnne and Louise Santeramo, 9/15/15, written statement
Maryellen Donovan, 9/10/15, written statement
Michael and Harriet Kozak, 9/11/15, written statement
Michael McKinernan, 9/13/15, written statement
Michele Attar and Jack Attar, 9/29/15, written statement
Munshik Cleos Park and Hye Min Rho, 9/11/15, written statement
Nancy and James McLernon , no date, written statement
Nancy Strickland, 9/14/15, written statement
Nitza and Victor Carrasc,o 9/8/15, written statement
Norma and Joseph Balducci,i 9/8/15, written statement
Norma Keller and Nancy Savino, no date, written statement
Olga Cartaino, 9/11/15, written statement
Patrica Finlay, 9/8/15, written statement
Patricia Benson, 9/10/15, written statement
Patricia Musynske, 9/18/15, written statement
Patrick and Janet Hehir, 9/19/15, written statement
Patrick and Kathleen Schweiger, 9/11/15, written statement
Paula and Vito Ventre, 9/12/15, written statement
Peter and Debra Milanski, 9/17/15, written statement
Peter and Mary Holzer, 9/18/15, written statement
Peter Lekarbergern, 9/10/15, written statement
Phil and Virginia Lockwood, 9/9/15, written statement
R. Bedvossian, 9/15/15 , written statement
Richard and Jeanne Longueira, 9/9/15, written statement
Richard and Veronica Sowa, 9/9/15, written statement
Richard Placente and Patricia Varnis, 10/6/15, written statement
Robert and Florence Moore, 9/9/15, written statement

Robert and Louis Williamson, 9/10/15, written statement
Robert and M Dusel, 9/19/15, written statement
Robert and Margaret Hessler, 9/10/15, written statement
Robert Fieldre, 9/10/15, written statement
Rosalie Winslow, 9/14/2015, written statement
Rosanne Smith, 9/11/15, written statement
Rose Genery, 9/16/15, written statement
Roxanne and John Wolf, 9/11/15, written statement
Salvatore and Betty Santeangelo, no date, written statement
Saverio and JoAnne Perillo, 9/9/15, written statement
Sergio and John Nicolich, 9/3/15, written statement
Shirley Farley, 9/17/15, written statement
Stephen and Ada Gavora, 9/16/15, written statement
Stephen DeDalto, 9/15/15, written statement
Stephen Fox, Anita Fox, 9/8/15, written statement
Susan and Helen Nicholas, 9/14/15, written statement
Susan and Robert King, 9/15/15, written statement
Susan Kababik, 9/9/15 , written statement
Theadora Kavanagh and Althea Kelley, 9/15/15, written statement
Theresa and Thomas Knight, 9/8/15, written statement
Theresa Marangiello, 9/9/15, written statement
Thomas and Beatrice Costanzo, no date, written statement
Thomas and Margaret Newby, 9/18/15, written statement
Vincent and Antionette Assalone, 9/01/15, written statement
Vincent Maliese, 9/15/15, written statement
Water Franklin, 9/9/15, written statement
Yolanda Paolini and Sue Anne King, 9/10/15, written statement
Yolanda Stivanello, 9/9/15, written statement

H: Public Hearing Testimony

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TRANSCRIPT OF THE
DEPARTMENT OF CITY PLANNING COMMISSION
PUBLIC HEARING

WEDNESDAY, DECEMBER 16, 2015

ONE BOWLING GREEN
BOROUGH OF MANHATTAN

VOLUME I

9:04 a.m. - 3:00 p.m.

Reported by:

Jennifer Cassella

Garry J. Torres

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HEARING CONVENED AT 9:04 A.M.

PRESENT:

- CARL WEISBROD, CHAIRPERSON
- KENNETH J. KNUCKLES, VICE CHAIRPERSON
- RAYANN BESSER, COMMISSIONER
- IRWIN G. CANTOR, COMMISSIONER
- ALFRED C. CERULLO, III, COMMISSIONER
- MICHELLE DE LA UZ, COMMISSIONER
- JOSEPH I. DOUEK, COMMISSIONER
- RICHARD W. EADDY, COMMISSIONER
- CHERYL COHEN EFFRON, COMMISSIONER
- ANNA LEVIN, COMMISSIONER
- ORLANDO MARIN, COMMISSIONER
- LARISA ORTIZ, COMMISSIONER
- YVETTE V. GRUEL, CALENDAR OFFICER

Also Present:

- Staff
- The Public
- The Press

Proceedings

1
2 THE CHAIRPERSON: Ladies and
3 gentlemen if you will please -- I know
4 that there's going to be a number of
5 people that will come in throughout the
6 day, but good morning and welcome to the
7 City Planning Commission Public Meeting.

8 Before we begin, I know that
9 probably most of you, if not virtually all
10 of you, are here to discuss two important
11 proposals, Mandatory Inclusionary Housing
12 and Zoning Quality and Affordability, but
13 before we do that, we do have a few other
14 matters to address, which shouldn't take
15 too long and I'll have more to say about
16 our procedures for our hearing when we get
17 to that point in our proceedings, which
18 should be fairly shortly, but with that,
19 Madame Secretary, please begin.

20 MS. GRUEL: Good morning. This is
21 a City Planning Commission Public Meeting
22 held in the National Museum of the American
23 Indian, One Bowling Green. Today is
24 Wednesday, December 16th, 2015. As a
25 courtesy during the proceedings, we ask

Proceedings

1
2 that you please turn off all cell phones
3 and beepers. All speakers should fill out
4 a speakers card at the desk outside of the
5 auditorium. In addition, we ask that those
6 providing testimony please identify
7 yourself, limit your remarks to four
8 minutes, and speak clearly into the
9 microphone.

10 I will now call the roll.

11 MS. GRUEL: Chairman Weisbrod.

12 THE CHAIRPERSON: Here.

13 MS. GRUEL: Vice Chairman
14 Knuckles.

15 (No response.)

16 MS. GRUEL: Commissioner Besser.

17 COMMR. BESSER: Here.

18 MS. GRUEL: Commissioner Cantor.

19 (No response.)

20 MS. GRUEL: Commissioner Cerullo.

21 COMMR. CERULLO: Here.

22 MS. GRUEL: Commissioner de la Uz.

23 COMMR. DE LA UZ: Here.

24 MS. GRUEL: Commissioner Douek.

25 COMMR. DOUEK: Here.

Proceedings

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MS. GRUEL: Commissioner Eaddy.

COMMR. EADDY: Here.

MS. GRUEL: Commissioner Efron.

COMMR. COHEN EFFRON: Here.

MS. GRUEL: Commissioner Levin.

COMMR. LEVIN: Here.

MS. GRUEL: Commissioner Marin.

COMMR. MARIN: Here.

MS. GRUEL: Commissioner Ortiz.

COMMR. ORTIZ: Here.

MS. GRUEL: A quorum is present.

The first item is the approval of
the minutes of the regular meeting of
Wednesday, November 18th, 2015.

THE CHAIRPERSON: On the minutes,
may I have a motion to approve?

COMMR. EADDY: So moved.

COMMR. MARIN: Second.

THE CHAIRPERSON: All in favor?

(Chorus of Ayes.)

THE CHAIRPERSON: Any opposed?

(No response.)

THE CHAIRPERSON: Any abstentions?

(No response.)

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Proceedings

THE CHAIRPERSON: Madame
Secretary, the minutes are approved.

MS. GRUEL: Scheduling: On
Calendars No. 1 and 2, we have resolutions
for adoption scheduled Monday January 4th,
2016 for a public hearing to be held in
Spector Hall, 22 Reade Street, and
scheduled on Calendar No. 3 through 7, we,
have resolutions for adoption scheduled on
Wednesday, January 6th, 2016 for a public
hearing to be held at the Brooklyn Borough
Hall Courtroom Auditorium, 209 Joralemon
Street, Second Floor.

THE CHAIRPERSON: Madame
Secretary, before I ask for a motion to
approve the resolutions, I do want to note
that Commission Vice Chairman Knuckles and
Commissioner Cantor have arrived.

MS. GRUEL: Thank you.

THE CHAIRPERSON: So on the
resolutions, may I have a motion to
approve?

COMMR. DOUEK: So moved.

COMMR. LEVIN: Second.

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Proceedings

THE CHAIRPERSON: All in favor?

(Chorus of Ayes.)

THE CHAIRPERSON: Any opposed?

(No response.)

THE CHAIRPERSON: Any abstentions?

(No response.)

THE CHAIRPERSON: The resolutions,
Madame Secretary, are approved.

MS. GRUEL: The next part of the
calendar is the report section on page 101.

Borough of Brooklyn, Calendar
Nos. 8 and 9. Calendar No. 8, CD 5 - C
160002 ZMK. Calendar No. 9, C 160003 HAK.
In the matter of applications for an
amendment of the Zoning Map, for a UDAAP
designation, project approval and
disposition of property concerning Van
Sinderen Plaza.

For Favorable Reports on Calendar
Nos. 8 and 9:

Chairman Weisbrod.

THE CHAIRPERSON: Yes.

MS. GRUEL: Vice Chairman
Knuckles.

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Proceedings

THE VICE CHAIRPERSON: Yes.

MS. GRUEL: Commissioner Besser.

COMMR. BESSER: Yes.

MS. GRUEL: Commissioner Cantor.

COMMR. CANTOR: Yes.

MS. GRUEL: Commissioner Cerullo.

COMMR. CERULLO: Yes.

MS. GRUEL: Commissioner De La Uz.

COMMR. DE LA UZ: Yes.

MS. GRUEL: Commissioner Douek.

COMMR. DOUEK: Yes.

MS. GRUEL: Commissioner Eaddy.

COMMR. EADDY: Yes.

MS. GRUEL: Commissioner Efron.

COMMR. COHEN EFFRON: Yes.

MS. GRUEL: Commissioner Levin.

COMMR. LEVIN: Yes.

MS. GRUEL: Commissioner Marin.

COMMR. MARIN: Yes.

MS. GRUEL: Commissioner Ortiz.

COMMR. ORTIZ: Yes.

MS. GRUEL: Calendar Nos. --

Favorable Reports have been adopted on

Calendar Nos. 8 and 9.

1 Proceedings

2 Borough of Staten Island, Calendar
3 Nos. 10 and 11. Calendar No. 10, CD 3, N
4 150340 ZRR. Calendar No. 11, N 140172 RCR.
5 In the matter of applications, for an
6 amendment of the Zoning Resolution and for
7 the grant of a Certification concerning,
8 521-529 Durant Avenue.

9 For a Favorable Report on Calendar
10 No. 10, and for adoption on Calendar No.
11 11:

12 Chairman Weisbrod.

13 THE CHAIRPERSON: Yes.

14 MS. GRUEL: Vice Chairman
15 Knuckles.

16 THE VICE CHAIRPERSON: Yes.

17 MS. GRUEL: Commissioner Besser.

18 COMMR. BESSER: Yes.

19 MS. GRUEL: Commissioner Cantor.

20 COMMR. CANTOR: Yes.

21 MS. GRUEL: Commissioner Cerullo.

22 COMMR. CERULLO: Yes.

23 MS. GRUEL: Commissioner De La Uz.

24 COMMR. DE LA UZ: Yes.

25 MS. GRUEL: Commissioner Douek.

1 Proceedings

2 COMMR. DOUEK: Yes.

3 MS. GRUEL: Commissioner Eaddy.

4 COMMR. EADDY: Yes.

5 MS. GRUEL: Commissioner Efron.

6 COMMR. COHEN EFFRON: Yes.

7 MS. GRUEL: Commissioner Levin.

8 COMMR. LEVIN: Yes.

9 MS. GRUEL: Commissioner Marin.

10 COMMR. MARIN: Yes.

11 MS. GRUEL: Commissioner Ortiz.

12 COMMR. ORTIZ: Yes.

13 MS. GRUEL: A Favorable Report has
14 been adopted on Calendar No. 10, and
15 Calendar No. 11 has been adopted.

16 Borough of Staten Island, Calendar
17 Nos. 12 through 19. Calendar No. 12, CD 1,
18 N 150421 ZRR; Calendar No. 13, C 150422
19 ZMR; Calendar No. 14, N 150423 ZAR;
20 Calendar No. 15, N 150424 ZAR; Calendar
21 No. 16, N 150425 ZAR; Calendar No. 17, N
22 150426 ZAR; Calendar No. 18, N 150427 ZCR;
23 Calendar No. 19, C 150428 PPR. In the
24 matter of applications for amendments of
25 the Zoning Resolution, and for the Zoning

Proceedings

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2 Map, for the grant of authorizations and a
3 Certification and for the disposition of
4 one city-owned property concerning The
5 Landmark Colony.

6 For Favorable Reports on Calendar
7 Nos. 12, 13 and 19 and for adoption on
8 Calendar Nos. 14 through 18:

9 Chairman Weisbrod.

10 THE CHAIRPERSON: Madame
11 Secretary, I just want to note that having
12 visited this beautiful and enticing site
13 that has really laid dormant for so many
14 decades now, it is really a pleasure to see
15 the site finally being put to such
16 productive use and I enthusiastically vote
17 aye on this matter.

18 MS. GRUEL: Vice Chairman
19 Knuckles.

20 THE VICE CHAIRPERSON: Yes.

21 MS. GRUEL: Commissioner Besser.

22 COMMR. BESSER: Landmark Colony
23 will provide much needed senior housing for
24 Staten Island while adaptively inducing
25 several buildings on the Farm Colony

Proceedings

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2 Campus, which also was a condition of
3 Borough President James Oddo's support.

4 This project will expand public
5 access to open space within the Greenbelt
6 network and will be comprised of 344
7 residential units, 10 percent of which will
8 be affordable. I would like to thank the
9 developer in this resolution for his
10 interest in this unique and challenging
11 site that was vacant for over 30 years.

12 Thank you, Chair Weisbrod, for
13 your support. I would like to acknowledge
14 the hard work of the Department of City
15 Planning staff, EDC, and especially the
16 leadership, vision and determination of
17 Borough President James Oddo. I vote yes.

18 MS. GRUEL: Commissioner Cantor.

19 COMMR. CANTOR: Yes.

20 MS. GRUEL: Commissioner Cerullo.

21 COMMR. CERULLO: Time is a strange
22 thing. For over 30 years, the site that is
23 the subject of this action has been on the
24 radar screen of most elected officials,
25 preservationists, developers and policy

Proceedings

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2 makers.

3 Normally I would say what a shame
4 it is that it has taken so long to get to
5 today's action, but to do that, would be to
6 ignore the fact that the time that has
7 passed, however unfortunate that it may be
8 too many, it has only resulted in a
9 development of a project plan that is far
10 superior to anything that could have ever
11 been proposed in the past. This project
12 site is part of New York City Farm Colony,
13 Seaview Hospital Historic District,
14 designated by the Landmarks Preservation
15 Commission over three decades ago.
16 Originally designated as the Richmond
17 County Poor Farm and renamed at the
18 beginning of the 20th Century New York City
19 Farm Colony, it served those in need in
20 returned for the work they did on the farm,
21 and it grew to housing 1,700 residents in
22 the 1940's.

23 But, as times change, the
24 population was relocated and the site
25 declined and was left by the mid 70s with

Proceedings

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2 really no hope, until now. I want to
3 acknowledge the work of the applicant in
4 proposing such a respectful and forward
5 thinking plan for this unique site, and for
6 the Island's political leadership, and our
7 City Administration, including this
8 Department's staff for all the work they
9 have done to make this a reality.

10 Landmark Colony is truly an
11 opportunity for local seniors and seniors
12 from beyond our shores to find a special
13 new home to call Staten Island during a
14 very new chapter in their lives. I happily
15 vote yes.

16 MS. GRUEL: Commissioner De La Uz.

17 COMMR. DE LA UZ: This is an
18 incredible project. It's long overdue. I
19 only wish that you could have achieved a
20 greater depth and affordability for the
21 portion of the project that is affordable.
22 I do understand, though, that the
23 development team is in place to making a
24 significant development in this project and
25 that there will be a number of other public

Proceedings

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2 benefits accessible to the community. I
3 vote yes.

4 MS. GRUEL: Commissioner Douek.

5 COMMR. DOUEK: Yes.

6 MS. GRUEL: Commissioner Eaddy.

7 COMMR. EADDY: Yes.

8 MS. GRUEL: Commissioner Efron.

9 COMMR. COHEN EFFRON: Yes.

10 MS. GRUEL: Commissioner Levin.

11 COMMR. LEVIN: I echo the comments
12 of Commissioner De La Uz. I vote yes.

13 MS. GRUEL: Commissioner Marin.

14 COMMR. MARIN: Yes.

15 MS. GRUEL: Commissioner Ortiz.

16 COMMR. ORTIZ: Yes.

17 MS. GRUEL: Favorable Reports have
18 been adopted on Calendar Nos. 12, 13 and
19 19, and Calendar Nos. 14 through 18 have
20 been adopted.

21 Borough of Staten Island, Calendar
22 No. 20, CD 2, N 160017 ZAR. In the matter
23 of an application for the grant of an
24 Authorization concerning 147 Benedict Road.

25 For adoption on Calendar No. 20:

Proceedings

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Chairman Weisbrod.

THE CHAIRPERSON: Yes.

MS. GRUEL: Vice Chairman
Knuckles.

THE VICE CHAIRPERSON: Yes.

MS. GRUEL: Commissioner Besser.

COMMR. BESSER: Yes.

MS. GRUEL: Commissioner Cantor.

COMMR. CANTOR: Yes.

MS. GRUEL: Commissioner Cerullo.

COMMR. CERULLO: Yes.

MS. GRUEL: Commissioner De La Uz.

COMMR. DE LA UZ: Yes.

MS. GRUEL: Commissioner Douek.

COMMR. DOUEK: Yes.

MS. GRUEL: Commissioner Eaddy.

COMMR. EADDY: Yes.

MS. GRUEL: Commissioner Efron.

COMMR. COHEN EFFRON: Yes.

MS. GRUEL: Commissioner Levin.

COMMR. LEVIN: Yes.

MS. GRUEL: Commissioner Marin.

COMMR. MARIN: Yes.

MS. GRUEL: Commissioner Ortiz.

1 Proceedings

2 COMMR. ORTIZ: Yes.

3 MS. GRUEL: Calendar No. 20 has
4 been adopted.

5 Borough of Staten Island, Calendar
6 No. 21, CD 2, N 160018 ZAR. In the matter
7 of an application for the grant of an
8 Authorization concerning 163 Benedict Road.

9 For adoption on Calendar No. 21:
10 Chairman Weisbrod.

11 THE CHAIRPERSON: Yes.

12 MS. GRUEL: Vice Chairman
13 Knuckles.

14 THE VICE CHAIRPERSON: Yes.

15 MS. GRUEL: Commissioner Besser.

16 COMMR. BESSER: Yes.

17 MS. GRUEL: Commissioner Cantor.

18 COMMR. CANTOR: Yes.

19 MS. GRUEL: Commissioner Cerullo.

20 COMMR. CERULLO: Yes.

21 MS. GRUEL: Commissioner De La Uz.

22 COMMR. DE LA UZ: Yes.

23 MS. GRUEL: Commissioner Douek.

24 COMMR. DOUEK: Yes.

25 MS. GRUEL: Commissioner Eaddy.

1 Proceedings

2 COMMR. EADDY: Yes.

3 MS. GRUEL: Commissioner Efron.

4 COMMR. COHEN EFFRON: Yes.

5 MS. GRUEL: Commissioner Levin.

6 COMMR. LEVIN: Yes.

7 MS. GRUEL: Commissioner Marin.

8 COMMR. MARIN: Yes.

9 MS. GRUEL: Commissioner Ortiz.

10 COMMR. ORTIZ: Yes.

11 MS. GRUEL: Calendar No. 21 has
12 been adopted.

13 The next part of the Calendar is
14 the Public Hearing section on page 18.

15 THE CHAIRPERSON: Madame Secretary
16 and everyone, this is -- this is a
17 continuation, these two proposals that
18 we'll be hearing today, Mandatory
19 Inclusionary Housing and Zoning for Quality
20 and Affordability, is a continuation of a
21 discussion that began early this year in
22 February. It is, as is true of all of our
23 actions that go through a public review
24 process, this is a process that has
25 informed everyone on this Commission to

Proceedings

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2 date and a process that today will further
3 inform our discussions, and as the process
4 goes forward, as true in the vibrant
5 democracy we live in, I'm sure that we'll
6 all listen carefully and changes and
7 modifications are made as we hear the views
8 of people who are in favor, and people who
9 are opposed, and people who are partially
10 in favor, people who are partially opposed.
11 We know that this has generated a lot of
12 interest in the City and we very much look
13 forward to today's hearing.

14 But as such, we want all speakers
15 with all points of view to have an
16 opportunity to be clearly heard today. So
17 I ask all of you to be respectful, listen,
18 no applause, no booing, no ruckus behavior.
19 We expect everyone will maintain
20 appropriate decorum as we proceed through
21 the day.

22 I'd like to go over a few
23 procedural items, and I hope all of you
24 have picked up the public meeting protocol
25 that is outside of this auditorium. With

Proceedings

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2 the exception of public officials, speakers
3 are going to be called in numerical order.
4 We will begin with the first five speakers
5 in favor, followed by five speakers in
6 opposition. The hearing will proceed in
7 this manner until everybody present has had
8 an opportunity to be heard.

9 Since we have two items before us,
10 all people who speak will have a total of
11 four minutes to speak on one or both items
12 as they choose. I'll also announce when we
13 have a limited English speaker who will be
14 given six minutes to speak when using an
15 interpreter to deliver their testimony. If
16 no interpreter is available, testimony may
17 still be delivered in their native
18 language, which will be recorded, and a
19 translation will be provided to the
20 Commission at a future date.

21 We are also interested and try to
22 be, to give you all a better sense of
23 timing, speaker numbers will be posted on
24 the white board in front of the auditorium,
25 adjacent to the podium over there, to help

Proceedings

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2 keep track of where we are. And also as a
3 courtesy, the Department of City Planning
4 will periodically post the speaker number
5 in realtime on Twitter and on the
6 Department's website. To ensure that each
7 speaker can be heard and transcribed
8 accurately, I ask that you do provide the
9 same courtesy to each speaker as you would
10 expect for yourself.

11 I will call the first five
12 speakers and then we will, I think, have
13 some elected officials, and then we will
14 call the next five in opposition.

15 So the first five speakers,
16 numbers one through --

17 MS. GRUEL: Excuse me. Let me
18 read the items.

19 THE CHAIRPERSON: I'm sorry.

20 MS. GRUEL: I have to read the
21 items.

22 THE CHAIRPERSON: You have to read
23 the items. Excuse me. Fair enough. Thank
24 you, Madame Secretary.

25 MS. GRUEL: Citywide Calendar

Proceedings

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2 No. 22, N 160051 ZRY. A public hearing in
3 the matter of an application, for an
4 amendment of the Zoning Resolution
5 concerning Mandatory Inclusionary Housing.

6 And Citywide Calendar No. 23,
7 N 160049 ZRY. A public hearing in the
8 matter of an application, for an amendment
9 of the Zoning Resolution concerning Zoning
10 for Quality and Affordability.

11 Notice: A public hearing is also
12 being held by the City Planning Commission
13 in conjunction with the above ULURP
14 hearings to receive comments related to a
15 Draft Environmental Impact Statement.

16 This hearing is being held
17 pursuant to the State Environmental Quality
18 Review Act and the City Environmental
19 Quality Review.

20 THE CHAIRPERSON: Thank you,
21 Madame Secretary.

22 MS. GRUEL: You're welcome.

23 THE CHAIRPERSON: Now can I call
24 the first five speakers?

25 MS. GRUEL: Yes. Yes, you may.

Proceedings

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2 THE CHAIRPERSON: Thank you very
3 much.

4 The first five speakers are,
5 first, Deputy Mayor Alicia Glen, then HPD
6 Commissioner Vicky Been, followed by James
7 Arnold from AARP, Sharon Cromwell from
8 Local 32BJ, and Colvin Grannum from the
9 Bedford Stuyvesant Restoration Corporation.

10 So we will start with Deputy Mayor
11 Glen.

12 Welcome, Deputy Mayor.

13 DEPUTY MAYOR GLEN: Good morning,
14 Chair Weisbrod, and the other members of
15 the City Planning Commission, and all of
16 the New York City residents who have come
17 here today to participate in building a
18 truly affordable city. I'm Alicia Glen.
19 I'm Deputy Mayor for Housing and Economic
20 Development, and I thank all of you for
21 offering and listening to testimony on such
22 an important issue for our City's future.
23 I know it's going to be a long day so we
24 really appreciate your service.

25 While today's hearing focuses on

Proceedings

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2 two critical initiatives, the Mandatory
3 Inclusionary Housing Program and Zoning for
4 Quality and Affordability, it's important
5 that these two initiatives are understood
6 within a larger context of the Mayor's
7 critical Housing New York Plan, which is to
8 design to create and preserve 200,000 units
9 of affordable housing.

10 As you all know, housing is a top
11 expense for most New Yorkers, and that's
12 whether you're a waiter, or a healthcare
13 attendant, a firefighter. For you, housing
14 is fundamental to your life. Housing
15 affects your health, your physical and
16 economic security, your education, your job
17 trajectory, and ultimately your sense of
18 possibility and optimism for the future.

19 A healthy supply of affordable
20 housing allows the diversity within and
21 between our neighborhoods that has long
22 been what makes New York City great, and
23 that diversity also fuels our long term
24 economic growth and competitiveness. We
25 want to remain a city that long time New

Proceedings

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2 Yorkers can stay in, from the coptious
3 behavior of our life and neighborhood that
4 angers the community, to an artist like, I
5 hope by namesake Alicia Keyes who was born
6 and raised here and went on to sing our
7 City's modern anthem. To do that, we need
8 to do this important work and there is no
9 more important work than securing housing
10 that is affordable for New Yorkers.

11 But we are now in a crisis, a
12 crisis where this fundamental building
13 block for people is under real threat for
14 millions of New Yorkers. We are literally,
15 literally in a housing emergency, the
16 Census Bureau has found, with an official
17 citywide vacancy rate of under
18 three-and-a-half percent, which is
19 essentially functional zero.

20 Simply to keep up with our
21 population group, we expect that the City
22 will need to add at least 160,000 units of
23 market-rate housing in addition to the
24 200,000 units of affordable housing that we
25 are building and preserving under the

Proceedings

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2 Housing New York Plan over the next decade.
3 And that demand is a direct result of a
4 drastically shrinking supply of affordable
5 housing. New York City has lost 250,000
6 rent regulated units since D control began
7 in 1994, and this has obviously been
8 especially tough on the families whose
9 rents and utility costs have continued to
10 rise and real wages continue to decline.

11 Our latest data shows that
12 56 percent of rental households are rent
13 burden in New York. What does rent burden
14 mean? It means that you're spending more
15 than 30 percent of your income on housing,
16 and, in fact, of those people who are rent
17 burden, now 33 percent of those are
18 severely rent burden, which means you're
19 spending more than half of your income on
20 housing. And this affordability gap is
21 tough not only for low-income households,
22 but to our critical workforce; our nurses,
23 our teachers, our first responders, and all
24 of this continues to be made worse by the
25 growing income inequality that we see in

Proceedings

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2 both our highest income and our lowest
3 income neighborhoods.

4 With Housing New York, we've
5 already made great progress to date with
6 our multi-pronged strategy. We've doubled
7 the capital budget for housing with
8 \$8.2 billion of City commitment that's
9 going to leverage over \$32 billion more in
10 private and public investment. We've added
11 more human capital to the agencies so that
12 we can actually implement all of our
13 programs. We've broadened the
14 affordability requirements when developers
15 receive 420 rate tax benefits, and we are
16 serving a wider range of New Yorkers than
17 ever before. Again, from households at our
18 lowest income to middle class families
19 whose housing needs are also not being met
20 by private market-rate development.

21 And we're also focusing on our
22 other global populations; our homeless, our
23 seniors, and our individuals with
24 disabilities. And as we work to create and
25 preserve more affordable housing, we are

Proceedings

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2 also partnering with our law enforcement
3 agencies at a level never seen before
4 because we will proactively prevent tenant
5 harassment and we will go after landlords
6 who practice harassment.

7 And to accomplish our development
8 goals, we're making sure that we get the
9 best possible value for the public. We are
10 scrutinizing deals and negotiating
11 aggressively with developers to make sure
12 that we're getting every affordable unit we
13 can, and that's both in preservation as in
14 the Stuyvesant Town deals, and in new
15 projects as in this growing economy.

16 But alongside these efforts, we
17 must add new tools to our toolbox in order
18 to build new affordable housing, and these
19 two initiatives for consideration before
20 the Commission today, Mandatory
21 Inclusionary Housing and the Zoning for
22 Quality and Affordability will help us do
23 this; not just help us do it, it is
24 necessary for us to do this.

25 Mandatory Inclusionary Housing

Proceedings

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2 guarantees permanently affordable housing
3 when zoning changes encourage for more
4 housing. And Zoning for Quality and
5 Affordability updates our regulations so
6 that our money we're spending on housing
7 will go further to create more affordable
8 housing and make better design buildings.
9 All affordable housing also deserves high
10 quality design. Look, these are Citywide
11 frameworks but they have been crafted with
12 the flexibility to meet the needs of our
13 diverse communities, each of which is
14 unique.

15 You will hear more details about
16 all of these initiatives throughout the
17 day. What I really want to stress: We are
18 in a true housing crisis and we can't just
19 sit by and do nothing as market pressures
20 change the city that many of us grew up in
21 and love. We are doing everything we can,
22 but we need the ability to do even more; to
23 harness the strength of the market and the
24 popularity of this amazing city, and we
25 have an historic opportunity to take the

Proceedings

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2 bold action necessary and enact the
3 strongest inclusionary housing requirements
4 in this nation.

5 I urge the City Planning
6 Commission to adopt Mandatory Inclusionary
7 Zoning and Zoning for Quality and
8 Affordability so that we can keep our great
9 city affordable.

10 Thank you very much.

11 THE CHAIRPERSON: Thank you,
12 Madame Deputy Mayor.

13 Questions for the Deputy Mayor?

14 Ms. De La Cruz.

15 COMMR. DE LA UZ: Hi, Deputy Mayor
16 Glen. Thank you for being here.

17 You know, given the affordable
18 housing crisis that exists and that you
19 just laid out, I think in terms of the
20 actions that need to be taken in order to
21 address it effectively and obviously this
22 Administration is very full plan to do so.
23 Where do you think the biggest
24 misunderstanding is between what the
25 Administration is trying to do and what

Proceedings

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2 people seem to be perceiving that the
3 administration is doing?

4 DEPUTY MAYOR GLEN: Well, I think
5 it's hard for me to explain what
6 everybody's perceptions are because I think
7 one of the good things this about this
8 process is that it allows all of the
9 different neighborhoods and all the
10 different communities to have an
11 opportunity to discuss what they think is
12 positive or not positive about the program.
13 So for me to try to summarize what is it of
14 the thoughts of New Yorkers with respect to
15 this I think would be for volley for me.
16 I do think that there is a sense of -- what
17 we are trying to do is extremely inflexible
18 and that we have an approach that is
19 one-size-fits-all. And I can tell you that
20 over the course of the past two years, I
21 think we have really worked quite hard to
22 fashion this program. We have been very,
23 very cognizant of the fact that
24 neighborhoods are incredibly different,
25 that the actual, whether it's the size of

Proceedings

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2 the plot, whether the developer is a
3 for-profit or nonprofit developer, what is
4 going on in the neighborhood, all of these
5 things have been factored into the way we
6 structured these two initiatives because we
7 do know that neighborhoods are different.

8 But we also know that in order to
9 do something that will fundamentally change
10 the supply of affordable housing, we need
11 to do something that gives us the tool to
12 say to developers, in areas where we are
13 now going to allow you to build more
14 housing than you otherwise would be able to
15 do, it's no longer the choice to say I will
16 do X amount of affordable housing so that I
17 can get Y. Communities need to understand
18 that this is a fundamental game changer.
19 In order to build that building, in order
20 to pull a permit, you have to build
21 affordable housing, and that's a
22 fundamental paradigm shift in the way in
23 which we're going to see neighborhoods grow
24 overtime.

25 And this has to be done with

Proceedings

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2 context with a very complex set of green
3 issues, and so the team at HPD and City
4 Planning have done an extraordinary job of
5 balancing all of these different concerns
6 but saying from now on, this is a city
7 that's going to grow and it's going to grow
8 in an equitable way so that when developers
9 build housing in areas where we are
10 allowing them to build more than they
11 otherwise could, communities will get
12 affordable housing. It's not will I get
13 it, it's I will get it the minute the
14 shovel goes in the ground. And to me, that
15 is again, a fundamental game changer in the
16 way in which housing is going to be
17 developed in New York City.

18 THE CHAIRPERSON: Thank you.

19 Any other questions of Deputy
20 Mayor?

21 Ms. Levin.

22 COMMR. LEVIN: Thank you for being
23 here. Thank you for advancing these
24 important initiatives. They're
25 certainly -- we can quarrel with the

Proceedings

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2 details but I think even reading the
3 Community Board reports and the Borough
4 President reports, it's clear that despite
5 all the nos, there is very broad support
6 for initiatives concerning affordable
7 housing.

8 These two proposals are going to
9 involve a degree of coordination across
10 City agencies that we don't typically see
11 in the zoning world, particularly the
12 Department of Housing Preservation and
13 Development and the Board of Standards and
14 Appeals. Could you tell us a little bit,
15 and perhaps this is a question for
16 Commissioner Been as well, but tell us a
17 little about about the processes that
18 you're putting in place, the programs are
19 putting in place to ensure that this is an
20 integrated process and that we don't have
21 all those different agencies heading off in
22 different directions.

23 DEPUTY MAYOR GLEN: Well, I thank
24 you for your question because I think one
25 of the things we are most proud about in

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2 the de Blasio Administration is that from
3 day one we were very clear that in order to
4 accomplish our affordable housing goals
5 consistent with our broader community
6 development objectives, that we needed to
7 get out of the traditional side lives of
8 HPD being here, and City Planning being
9 here, and oh, my God, what would the
10 Landmarks Commission say about this, and in
11 fact, I think one of the things that we've
12 done very well is have all of these
13 agencies reporting up to me so that we meet
14 on a regular basis to make sure that in
15 fact, not only are we not only coordinating
16 but that we're flagging issues where there
17 could be inconsistencies or where there
18 could to be challenges that maybe we
19 weren't even aware of.

20 And so I think we have an
21 unprecedented level of internal
22 coordination, and we also have been able, I
23 think, if you look at the work that we've
24 done to get to the proposals today, all of
25 those agencies have already opined and put

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2 their input in. So I think we spent a good
3 amount of time already flagging where there
4 could be both opportunity to coordinate
5 better, particularly with respect to
6 community infrastructure improvements,
7 neighborhood development initiatives, along
8 with rezonings, but also against simple
9 things like oh, there's six landmark --
10 potential landmarks.

11 And again, I think one of the
12 things we've done quite effectively, is
13 have a level of coordination that I
14 certainly haven't seen being in and out the
15 government for many years. So I think it's
16 not -- when the program gets implemented,
17 we already have the infrastructure in place
18 for the agencies to work together to make
19 sure we can make it even stronger than it
20 already is. But I think it's fair to say
21 that we are tighter, more integrated than
22 any other administration with the respect
23 of other agencies.

24 THE CHAIRPERSON: Ms. Efron.

25 COMMR. COHEN EFFRON: Deputy Mayor

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2 Glen, very wisely, the Administration has
3 worked and we have set aside money for
4 areas that are apart of rezoning in
5 contemplation in MIH and ZQA. Could you
6 tell us a little bit about the
7 implementation of that and what the
8 priorities are for that fund?

9 DEPUTY MAYOR GLEN: Sure. Thank
10 you. I just eluded to it briefly in my
11 prior response. One of the things we felt
12 very strongly was that if we are looking to
13 rezone neighborhoods to allow increased
14 density, we have to have a process where, I
15 get it's not just about the housing, it's
16 about how do they overhaul. The
17 neighborhood could be approved both to
18 accommodate an increased number of families
19 who might live in that neighborhood, but
20 also deal with some of the challenges on
21 the ground in realtime today.

22 So in the capital budget last
23 year, we were able to secure a billion
24 dollars in order to directly make
25 investments that go along with the

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2 neighborhood planning efforts that are
3 being engaged right now. There's several
4 rezonings that are currently being studied.
5 And so what we're doing is saying we don't
6 know what the needs of every specific
7 community is. It may be that you need a
8 new playground, it may be that we need to
9 widen the streets, it may be that we need
10 some light, maybe we need a senior center.
11 Again, as I said, the great thing about New
12 York is every neighborhood is different,
13 and so it's through that integrated process
14 where all of the agencies are meeting with
15 the stakeholders in the communities that we
16 get a general sense then what are the
17 capital needs in those communities. And
18 unlike the old days where you can have a
19 list with no dedicated budget to it, we now
20 have a dedicated budget.

21 So through the process of
22 community engagement, through the process
23 of all the Commissioners meeting with the
24 stakeholders, a series of priority projects
25 will get emerged and then get funded. This

Proceedings

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2 work has already begun in our first major
3 neighborhood while rezoning East New York,
4 or again, between the conversation of the
5 local elected officials and the
6 stakeholders, we've already identified a
7 series of capital projects that will begin
8 in realtime.

9 So to me, again, this is saying
10 we're doing this in a completely new
11 framework. We understand that folks can
12 feel nervous about more people moving into
13 the neighborhood and so we're going to
14 address those needs head on and make sure
15 that our capital investments, again, both
16 accommodate new families but also deal with
17 some of the challenges a community may be
18 facing today in realtime. This has never
19 been done. Actually, lining our capital
20 budget with our own process, what a way to
21 do it, right. This is exactly how smart
22 growth planning should work.

23 THE CHAIRPERSON: Ms. Ortiz.

24 COMMR. ORTIZ: Good morning,
25 Deputy Mayor. You mentioned in your

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2 testimony anti-tenant harassment and I
3 think that's an important piece of this
4 because one of the concerns that's been
5 raised is the concern about indirect
6 displacement, you know, as a neighborhood
7 improves, the ability of the people who
8 live there to benefit from those
9 improvements. Could you speak to that
10 piece of the -- and I understand it's the
11 non-regulatory piece but I think it's an
12 important part of the puzzle. Could you
13 speak to the Administration's efforts to
14 address that issue?

15 DEPUTY MAYOR GLEN: Certainly.
16 Again, I think it's very important that we
17 have change in neighborhoods and try to do
18 responsible new development. We don't want
19 to have anything happen to the families who
20 are already there. And as a former legal
21 services lawyer myself, I feel quite
22 strongly about this, that the single best
23 tool folks will have against any
24 intimidation or harassment by any bad
25 actors -- and, again, not all landlords are

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2 bad actors, but there are bad actors -- the
3 single best thing that could ever be done
4 for a tenant who feels like they are being
5 treated unjustly, is to have a lawyer. And
6 so we made an unprecedented commitment
7 again in realtime, in our operating budget
8 to put \$36 million into the budget to make
9 sure that any tenant through his subject to
10 harassment would get a lawyer.

11 Again, this is again, an attempt
12 to say we understand there are lots of
13 different pieces of this equation, but
14 under no circumstances will our
15 Administration tolerate any existing tenant
16 being harassed out of their building. So I
17 think again, we see this as a multi-pronged
18 approach and have made an unprecedented,
19 put your money where your mouth is
20 commitment.

21 COMMR. ORTIZ: Thank you.

22 THE CHAIRPERSON: Any other
23 questions for the Deputy Mayor?

24 Ms. De La Uz.

25 COMMR. DE LA UZ: Deputy Mayor

Proceedings

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2 Glen, I certainly appreciate the piece
3 about the legal services on anti-harassment
4 and it's certainly much needed. We've seen
5 a lot of that and it's something that I'm
6 very familiar with.

7 One thing that I think, obviously
8 for this piece here, for ZQA and for MIH,
9 you know, that's really not what we're
10 talking about here, but certainly as we
11 look to East New York and the other
12 rezonings, I think they go beyond just the
13 harassment piece and to talk about
14 displacement pressures beyond harassment
15 because you can illegally displace from
16 your community. I think that's one of the
17 missing pieces, and I know that's -- part
18 of these provisions are trying to address
19 some of that and I think as we come back
20 and look at the follow-up actions at the --
21 neighborhood level would be helpful for the
22 Administration to kind of unpack even
23 further the anti-displacement provisions
24 that are being -- the full range of
25 anti-displacement provisions that are being

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considered.

So I don't know if you can speak to that now or if you want to just hold that for a future --

DEPUTY MAYOR GLEN: Commissioner De La Uz, I absolutely understand the issue and challenges and I'll obviously let my colleague, Commissioner Been, address more of the initiatives. But again, this is why I wanted to put what's happening today into our context of the plan. This is not standalone. There are a whole series of new tools that the agencies have been given, both on the direct harassment and on our borough preservation strategies to ensure that in fact all of this does not result in neighborhoods changing to a way that are no longer recognizable to those who grew up there.

So that is absolutely part of our overall strategy and Commissioner Been will be able to discuss that, and I think again, the notion here is that this is a piece of a broader puzzle. We need every tool at

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2 our disposal. Neighborhoods, there are
3 buildings going up in neighborhoods right
4 now as we speak; vast, vast parts of New
5 York City. You can build a building right
6 now and not have to do any affordable
7 housing. So that is the status quo. This
8 may not be the most perfect solution in the
9 world, but the status quo is certainly not
10 going to address the concerns that are
11 legitimately being raised by communities.
12 We need every tool in our toolbox, we need
13 aggressive endorsement, we need a
14 fantastically directed preservation efforts
15 so that they can maintain our affordable
16 being housing stock, and we need to make
17 sure that every single time a building is
18 built in a neighborhood where we're adding
19 housing, that at least a quarter of those
20 units are available for affordable housing.
21 And that is the fundamental bottom line
22 that we're talking about today.

23 THE CHAIRPERSON: Any other
24 questions for the Deputy Mayor?

25 (No response.)

1 Proceedings

2 THE CHAIRPERSON: Thank you,
3 Madame Deputy Mayor.

4 The next speaker is Commissioner
5 Vicki Been.

6 MS. BEEN: Good morning,
7 Chair Weisbrod, and members of the City
8 Planning Commission. We echo the thanks in
9 your service today and always. I'm Vicki
10 Been, Commissioner of the Department of
11 Housing Preservation and Development, and
12 I'm here to support the proposals to create
13 a Citywide Mandatory Inclusionary Housing
14 Program and to update the zoning resolution
15 to allow more affordable and senior housing
16 that is better designed and more efficient.

17 Let me start with Zoning for
18 Quality and Affordability, which I'm going
19 to call ZQA. For years, affordable housing
20 developers, community organizations and
21 urban policy experts have documented how
22 outdated requirements in the zoning
23 resolution hinder our efforts to develop
24 high quality affordable housing in safe
25 liveable neighborhoods. ZQA is a

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2 thoughtful, comprehensive approach to
3 modernizing the zoning resolution. It
4 creates no new development rights for
5 market-rate housing. Instead, it allows
6 more efficient affordable and senior
7 housing by reforming the envelope
8 constraints that have not kept up with
9 modern design or building technology.

10 The proposed changes will allow
11 better ground floor retail in community
12 facilities, and that will result in higher
13 quality mixed used buildings and safer
14 streets. In addition, ZQA will allow more
15 affordable senior units to be built by
16 giving affordable senior housing the same
17 development rights the Voluntary
18 Inclusionary Program gives to affordable
19 housing.

20 ZQA also avoids wasting space and
21 money on underused parking lots in
22 affordable and senior housing near public
23 transit. Research shows that seniors and
24 low-income families living near mass
25 transit have fewer cars and need less

Proceedings

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2 parking than other households, or in
3 households living further from transit.
4 ZQA accordingly makes parking requirements
5 for affordable and senior housing in
6 transit-served neighborhoods voluntary,
7 allowing developers to provide only that
8 number of parking spaces that will actually
9 serve their tenants needs.

10 The proposed Mandatory
11 Inclusionary Housing Program, which I'm
12 going to call MIH, will require developers
13 in areas rezoned for new growth to provide
14 affordable housing for New Yorkers at a
15 range of low and moderate incomes. Like
16 ZQA, it will allow us to stretch our public
17 dollars so that we can devote more of our
18 public funds to the most critical needs and
19 will enhance neighborhood economic
20 diversity and allow mobility among our
21 neighborhoods, thereby producing
22 inequality.

23 The proposal would require, not
24 give an option, but require affordable
25 housing when future City Planning

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2 Commission actions, either community-wide
3 rezonings or private applications for
4 single lots, encourage substantial new
5 housing. That affordable housing will be
6 permanently affordable. Too much time and
7 money, not to mention worry by tenants,
8 goes into repositioning buildings with
9 expiring affordability programs. The mixed
10 income structure of the MIH program ensures
11 that permanent affordability is achieved
12 through cross subsidy from the market-rate
13 units.

14 In determining how many affordable
15 units should be required and the income
16 level for those units, we assessed the
17 financial feasibility of developments in
18 different markets across the city,
19 requirements that were too onerous will
20 result in no housing at all and thus will
21 only exacerbate our housing prices and
22 could run foul with the constitution and
23 other legal constraints.

24 We also designed the program to be
25 flexible enough to address different market

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2 and different neighborhood commissions,
3 different parts of the market cycle,
4 different cost constraints, and to work
5 with a wide variety of our existing
6 financing models and tax incentives. So
7 with all of that in mind, the proposal
8 allows the City Council and the City
9 Planning Commission to determine which of
10 two basic options would apply; 25 percent
11 of the units limited to households at an
12 average of 60 percent AMI, which is a
13 little less than 47,000 for a family of
14 three, or 30 percent of the units limited
15 at an average of 80 percent AMI, which is
16 about 62,000 for a family of three.

17 In addition, in areas where the
18 market is now renting at levels affordable
19 to families at about 120 percent AMI or
20 about 93,000 for a family of three, but
21 that neighborhood is changing rapidly and
22 is expected to see high rent increases and
23 an additional Workforce option of
24 30 percent set aside at 120 percent AMI
25 could be added to that basic option. The

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2 Workforce option is intended to permanently
3 lock in moderate income units in the
4 neighborhoods that are moving quickly to
5 higher income rents without halting the
6 development that is just emerging without a
7 subsidy.

8 Which of the two basic options
9 would be appropriate for the neighborhood
10 would be identified through the rezoning
11 process, including the Land Use Review
12 process. The basic option and whether the
13 Workforce option would also be available
14 would be subject to the approval of the
15 City Council for every neighborhood
16 rezoning or private application.

17 We've heard from some people that
18 the proposed MIH program does not do enough
19 because it doesn't require even more
20 affordable units or require housing for
21 even lower incomes. We understand those
22 concerns and we share the goal of
23 maximizing both the amount of affordable
24 housing in New York City and the range of
25 families served by that affordable housing

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2 community. That's why it's important to
3 realize that MIH is just one aspect of the
4 City's entire Housing Plan. It is meant to
5 compliment our existing subsidy programs
6 and other tools so that between the private
7 market and our public dollars, we can
8 provide affordable housing in the numbers
9 and at the incomes the City's households
10 need.

11 MIH allows up to shape growth and
12 new development to ensure the continued
13 diversity of our city and our
14 neighborhoods, which is a critical part of
15 what makes New York City so special. By
16 securing permanently affordable housing,
17 costs subsidized by market-rate units, we
18 will be able to devote more of our public
19 dollars to serving extremely low and very
20 low-income households, seniors, and those
21 with special needs. Our proposal, which
22 would create the most rigorous inclusionary
23 housing program in the nation, will help
24 people in every neighborhood across the
25 city be able to stay in this great city.

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2 So MIH and ZQA will be strong
3 tools to add to our toolkit to allow us to
4 create the high quality affordable housing
5 in diverse, stable and vibrant
6 neighborhoods that our residents need to
7 thrive.

8 I'm happy to answer any questions
9 and look forward to hearing from everybody
10 and to hearing the ideas on how to make our
11 proposals even better. So thank you for
12 the opportunity to testify and I'm happy to
13 elaborate on the anti-displacement or if
14 you have -- any of the other questions that
15 you have.

16 THE CHAIRPERSON: Thank you,
17 Commissioner.

18 Ms. De La Uz.

19 COMMR. DE LA UZ: First, I just
20 want to say that I know you and your team
21 have been working very hard to try to
22 unpack all of the complexities of both of
23 these proposals and obviously the current
24 proposal in East New York, and have done
25 far above what has been customary in that

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2 regard and I just want to say thank you for
3 that because I know that's very important.

4 I'll start with MIH, and you
5 obviously already acknowledged that I think
6 the biggest concern that folks have is that
7 there's really -- the greatest gap and
8 certainly the City's Housing Plan
9 recognizes, is the biggest gap between the
10 current supply of affordable housing and
11 the current need is really -- AMI is lower
12 than 60 percent of AMI.

13 MS. BEEN: Absolutely.

14 COMMR. DE LA UZ: And the
15 Administration was really upfront about its
16 commitment about -- in the affordable
17 Housing Plan, about ten percent of the
18 units going to extremely low-income
19 families. I'm just wondering, in light of
20 the concerns that I'm hearing through this
21 process from communities and in light,
22 honestly, of the fact that the City's own
23 study points that there seems to be some
24 flexibility in terms of the feasibility to
25 reach greater depths of affordability.

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2 Would the Administration revisit
3 the percent of units that it would commit
4 to preserving your building below 60
5 percent of AMI as a result of the concerns
6 that are being heard?

7 MS. BEEN: So I think we are
8 revisiting and we have revisited. As you
9 may know, we've introduced several new
10 programs to get to even lower incomes, our
11 Extremely Low and Low Income program, which
12 we call ELLA -- and as you can see we have
13 a propensity to acronyms -- and our Senior
14 Affordable Rental Program called SARA,
15 reached those very low incomes. We have --
16 I think if you -- one that's critically
17 important to remember is that MIH will be
18 applied to an individual rezoning. That
19 rezoning will unpack the needs of the
20 community, the aspirations of the
21 community, there will be a full dialogue
22 with the community and engagement with the
23 community about what its needs are, and
24 then on that basis, we will be looking to
25 exactly what kind of a housing program do

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2 we need to provide in that community, which
3 will include both preservation and new
4 construction.

5 So for example, in East New York,
6 we've worked very closely with the
7 community to try to figure out, okay, how
8 do we address these very, extremely
9 low-income, very low-income households, and
10 we promised that in the first 1,200 units,
11 for example, that are being built on
12 city-owned land, we will be providing
13 15 percent of the housing at that
14 40 percent level, more than we committed to
15 in the Housing Plan. So we are trying to
16 use our -- to stretch our public dollars to
17 get down to those very low incomes and we
18 will continue to do so.

19 COMMR. DE LA UZ: If I may, I
20 mean, I think those efforts are greatly
21 appreciated. You know, going back to the
22 point that MIH is permanently affordable.
23 You know, right now, the difference between
24 MIH and ELLA and SARA is the length of
25 affordability, and so I think that's also

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2 part of the concern. I think that
3 everybody recognizes that we need deeply
4 affordable housing in perpetuity, and if we
5 can't reach that -- right now, the current
6 financing tools that HPD, besides the
7 inclusionary, don't allow us to reach
8 permanent affordability. So I think
9 that's -- that's one thing, I think, to
10 think about.

11 And if I may, Chair, I just want
12 to go over to ZQA for a moment. As you've
13 rightly outlined, the actual utilization in
14 affordable housing, in particular
15 affordable senior housing, and parking is
16 minuscule when you compare it, obviously,
17 to market-rate housing. In the proposal,
18 that's, I think generated a lot of concern
19 from Community Boards and Borough
20 Presidents about the voluntary nature of
21 that.

22 Given the propensity of developers
23 to want to opt out of something of that
24 cost, which often goes unutilized or
25 underutilized, what would HPD's role be in

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2 working out when it would be appropriate
3 for some level of parking to be provided in
4 an affordable project or affordable senior
5 project?

6 MS. BEEN: So we will work with,
7 as you well know, when developers bring us
8 projects or when we solicit developers on
9 projects, for example, where we have public
10 land and we're putting out an RFP, we do an
11 extensive analysis of what the community
12 demographics are including things like car
13 ownership rates. And so we will be
14 building that into the dialogue that we
15 have with the developers and we will, you
16 know, be pushing them and pushing in our
17 RFPs to make sure that there's a thoughtful
18 analysis of what the clients needs are,
19 what the eventual tenants needs are going
20 to be, and to make sure that that's
21 provided. It's not our goal nor our intent
22 to, you know, have people end up in
23 buildings that don't serve their needs and
24 we work very hard with developers to make
25 sure that that doesn't happen.

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2 COMMR. DE LA UZ: So it wouldn't
3 be the default position to say all projects
4 wouldn't have -- all affordable projects or
5 senior projects would not have parking?

6 MS. BEEN: No. I mean, as you
7 know, the -- our studies of the vehicle
8 registration rates in low-income senior
9 housing shows that less than five percent
10 of them have cars. So, you know, I think
11 we would start there, but if they are
12 higher income, if they're in neighborhoods
13 that -- where the car usage is higher, then
14 it would be a different story.

15 THE CHAIRPERSON: Other questions
16 for Commissioner Been?

17 Ms. Efron.

18 COMMR. COHEN EFFRON: Thank you.

19 There was a recent report about
20 the number of units not in rent
21 stabilization that were eligible to be in
22 there and it's not a criticism of this
23 Administration nor the amazing work you've
24 been doing, and I'm not going to compare
25 apples to oranges, but with 200,000 new

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2 units of affordable, if not more, housing
3 going forward, could us talk to us about
4 the mechanisms for enforcement and
5 specifically the role of the non-profits as
6 intermediaries with developers on the
7 affordable housing?

8 MS. BEEN: Absolutely. Thank you
9 for that question.

10 I that that enforcement is
11 absolutely critical and we've been taking a
12 very hard look back at HPD about all of our
13 enforcement efforts. We have put enormous,
14 tens of millions of dollars in the last two
15 years to building up our technological
16 infrastructure so that we have a much
17 better tracking of every single unit, what
18 kinds of restrictions it's under, how we're
19 enforcing those, who's in charge of
20 enforcing them, and, you know, all of that,
21 and we're going to continue to build on
22 that.

23 We're doing some restructuring to
24 better -- to improve our enforcement and
25 our tracking mechanisms. We're looking at

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2 using more of the third-party sort of
3 monitors for that and so, you know, we will
4 be -- we're deeply committed to ensuring
5 the enforcement of every regulatory
6 restriction that goes into every unit, but
7 we certainly understand that that has to be
8 ramped up and we are making steps to do
9 that ramping.

10 THE CHAIRPERSON: Ms. Levin.

11 COMMR. LEVIN: Commissioner Been,
12 I'd like to take you up on your offer to
13 talk further about tenant displacement and
14 harassment, whatever. It strikes me that
15 you have been an observer for a very long
16 time of the forces involved in the
17 production of housing across this city,
18 well before you got to HPD, and I think one
19 of the underlying fears we hear in the
20 public conversation about this is that this
21 is going to, by creating additional
22 opportunities for development, additional
23 prospects for development, that even before
24 you get to the individual rezoning level,
25 this is going to put pressure on sites to

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2 encourage property owners and developers to
3 think about development when they might not
4 otherwise have been thinking about
5 development, so that well before you get to
6 the ULURP process, there are forces at work
7 to put pressure on the affordable housing
8 that we currently have.

9 So in that context, what can you
10 say to us about A, whether these proposals
11 by themselves will increase displacement
12 pressures and B, what you are doing about
13 protecting -- keeping tenants in their
14 homes, because that's really how we
15 maintain neighborhood diversity?

16 MS. BEEN: Absolutely. Thank you
17 for your attention to that really vital
18 question which is certainly a concern in
19 many of our neighborhoods. So let me --
20 it's two pieces, and let me start with the
21 first piece.

22 I guess, maybe you know different
23 developers than I do, but I've never met a
24 developer who isn't thinking all the time
25 about where they can develop and looking at

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2 every piece of land with that in mind. It
3 doesn't require a future rezoning or even a
4 mention of rezoning to make developers
5 think about where they can develop, right,
6 and I think that's the critical thing. As
7 long as there are -- as long as there is
8 demand, people will build. They will find
9 ways to build, right. And right now, they
10 can build with no affordability whatsoever.

11 What this proposal does is to say
12 when you build, in the areas that we are,
13 you know, comprehensively rezoning or where
14 you are asking for an up-zone, you must
15 provide that affordable housing, and that
16 affordable housing will help to one,
17 relieve the pressures because there will
18 just be more of the affordable housing, and
19 second, it will help to relieve any
20 displacement pressures because it will be
21 available to the people in the
22 neighborhood, right?

23 So I think if we do nothing, the
24 pressures will continue to grow, stocking,
25 you know, not passing mandatory, will not

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2 stop those forces. It will just mean that
3 they go forward without providing the
4 affordable housing that this would require.

5 So as to your second question
6 though, so our anti-displacement efforts
7 take a variety of different forms. The
8 first and most important is that we have to
9 preserve every unit of affordable housing
10 that is there now, and we are very
11 proactively going out, working with the
12 owners, long before the regulatory
13 restriction is set to expire, to be sure
14 that we can keep every one of those units
15 in an affordability program unit.

16 For the first time, we are also
17 very proactively trying to find tools to
18 bring more people into the programs that
19 aren't there now. So, for example, half of
20 the City's low-income, very low-income
21 renters live in buildings, one to five
22 family buildings. That isn't an area that
23 we've traditionally focused. We've tried,
24 but it's a hard stock to work with because
25 you can close a loan for five units or you

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2 can close a loan for 150 units and it
3 basically takes the same amount of work.

4 So we've been trying very hard to
5 find ways to work with those owners to
6 bring them into an affordability program,
7 to make them -- to allow them to continue
8 to rent at affordable rates. So, for
9 example, we've introduced a Green
10 Preservation Program where we give loans so
11 that they can make the uprates they need to
12 bring down their energy costs, to bring
13 down their waster costs, and thereby keep
14 the unit affordable.

15 So we're doing great new things to
16 try to bring more of the units that are not
17 now regulated into an affordability
18 program. The Deputy Mayor mentioned the
19 legal services. In addition, the City
20 Council has passed anti-harassment
21 legislation to prevent harassment buyout
22 offers. We have formed with the Attorney
23 General and with the Tenant Protection
24 Unit, we have formed an anti-harassment
25 task force that is proactively using our

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2 analytic capabilities, our histories of
3 owners, to target where we think there
4 might be a problem, to do proactive
5 inspections and to really enforce every law
6 that we can throw at a landlord who is
7 misbehaving. We've already gotten
8 indictments and we will continue to see
9 more of that in the months to come because
10 we've got a number of investigations
11 underway.

12 So all of those, you know, things
13 come together. This is a very multi-pronged
14 approach. It really requires every tool
15 that you can possibly throw at it. We've
16 surveyed other cities around the country
17 trying to find out what tools they're
18 using. We're exploring everything we can
19 and we'll continue to add to that toolbox.

20 THE CHAIRPERSON: Ms. Ortiz.

21 COMMR. ORTIZ: Good morning,
22 Commissioner.

23 MS. BEEN: Good morning.

24 COMMR. ORTIZ: To shift gears a
25 little bit, this is with respect to ZQA.

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2 You know, you mentioned, and it's something
3 that we've talked about very quickly in
4 passing, but the higher ground floor
5 retail, the floor-to-floor on the ground
6 floor would add, you know, additional five
7 feet to buildings. You know, why did that
8 come about? I mean, what challenge did HPD
9 find they were having with ground floor
10 spaces that this is solving, you know, what
11 issue are we resolving here?

12 MS. BEERS: What problem are we
13 solving for? That's always a great
14 question. So the problem that we're
15 solving for is that we usually require the
16 first floor to either be retail or
17 community facilities so that the street is
18 livelier, it's safer, etc., than just
19 having, you know, sort of a blank wall on
20 that first floor. But what we find is that
21 our developers have trouble attracting high
22 quality retail and the reason, you know,
23 here I'm going refer back to my earlier
24 life, when I was at the Furman Center and
25 we actually pulled together a roundtable

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2 with brokers, retail brokers, with a wide
3 variety of developers who developed the
4 space, and tried to understand why is it
5 that retail won't come into these
6 buildings, and the most common reason that
7 we heard is you build like nine-foot
8 ceilings, nobody wants to have retail in a
9 nine-foot ceiling. And so this is meant to
10 solve for that problem.

11 Having better retail both serves
12 the neighborhood better, it ensures that
13 there's the cross subsidy from the retail
14 into the affordable so it allows us to
15 stretch our dollars more, and it's what the
16 neighborhoods need to be lively, and
17 diverse, and vibrant and safe.

18 COMMR. ORTIZ: Thank you.

19 I think that's an important point
20 that there's a potential cross subsidy, and
21 that, you know, the vacancies aren't really
22 helping the overall building finances.

23 MS. BEEN: Definitely not.

24 COMMR. ORTIZ: Thank you.

25 THE CHAIRPERSON: Mr. Cantor.

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COMMR. CANTOR: Good morning.

Thank you for your very well-prepared
speech. My question goes to the parking.
You have indicated that your studies show
that around five percent of the seniors
would have cars and be a parking
requirement.

MS. BEEN: Low-income seniors.

COMMR. CANTOR: Low-income. Thank
you.

My question would be right now in
some of the boroughs like Queens, there are
fights on the street with out of Queens
people coming in, parking and using it as a
parking area. To eliminate completely the
requirement for parking, over time it's
going to make it worse, in my judgement,
and I don't know whether the city has yet
undertaken any studies in terms of how many
cars are parking in the city streets from
outer boroughs but it will be, I think to
eliminate, for us to learn the crush that's
being put on us by the outer city people.
When you eliminate parking requirements

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2 entirely making them voluntary, the
3 developers that are building it their way
4 and won't care anymore but the citizen
5 would care and I wonder how that's being
6 addressed.

7 MS. BEEN: So that's a great
8 question. One thing that's important to
9 realize is that in most of our buildings
10 when they are providing parking, it is only
11 for the residents so no, you know, nobody
12 can come in off the street and park in the
13 building, in many of the buildings.
14 Sometimes they charge, but often they don't
15 allow anyone other than staff or occupants
16 to use the parking, so that's one thing.

17 The second thing is remember, it's
18 only in transit-rich neighborhoods,
19 transit-oriented neighborhoods so in many
20 areas of Queens that you're talking about,
21 that may not -- this may not even apply,
22 but you've seen the map as to where exactly
23 it would apply. But the third point is
24 really the issue about folks from outside
25 the neighborhood or even outside of the

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2 city using on the street parking is a, as
3 you know, a much broader and much thornier
4 question. I think that the -- you know,
5 and it's beyond the scope of ZQA but it is
6 certainly a critical issue and of course
7 raises all of the concerns about -- all of
8 the issues about pricing, etc., that I
9 think the city is thinking about but it's
10 not part of these proposals.

11 COMMR. CANTOR: Well, I would
12 argue that while it might be beyond the
13 scope, why is it not in the scope?

14 MS. BEEN: Well, because this is
15 in the development itself, it's not on the
16 street parking, right. This is parking in
17 the development itself, so an underground
18 garage or a lot devoted to that residence.

19 COMMR. CANTOR: I think history
20 has shown that if parking spaces are
21 available that are reserved for tenants and
22 the tenants don't use them, history will
23 show that those spaces magically fill up.

24 MS. BEEN: Well, unfortunately, we
25 have many, many, many low income senior

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2 buildings where the parking spaces sit
3 vacant or even more unfortunately, perhaps
4 even in some cases tragically, they are
5 filled with, for example, a lawn chair
6 because instead of having green space or an
7 open space or a garden for the seniors who
8 live in that facility, we have an underused
9 parking space.

10 So I understand your point.
11 Parking is, you know, a critical issue for
12 everyone in the city. We do not think that
13 this proposal limited to low-income seniors
14 in the affordable buildings, you know, will
15 raise those -- that level of problem of the
16 kind that you're talking about. But I
17 understand -- I understand the concern and
18 we're working very hard to try to address
19 that concern more generally --

20 COMMR. CANTOR: Thank you.

21 MS. BEEN: Thank you.

22 THE CHAIRPERSON: Ms. De La Uz.

23 COMMR. DE LA UZ: Commissioner
24 Been, I just wanted to follow-up on
25 something that came up during our review

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2 session that I think you probably have more
3 information today than maybe it was
4 discussed at the Community Board perhaps,
5 and that is going to MIH and going to a
6 situation where folks -- where a developer
7 would have the option to do the in-lieu fee
8 for buildings that are between 10 and 25
9 units. Can you talk about a little about
10 about how the Administration would ensure
11 that that pool of money is invested for
12 affordable housing locally?

13 MS. BEEN: So the in-lieu fees,
14 which will be available for buildings that
15 are between 11 and 25 units, they don't
16 have to use the in-lieu fee, they can build
17 on site but they can use the in-lieu fee.
18 That in-lieu fee will go into a segregated
19 fund that will be designated for that
20 Community Board. It will stay in that fund
21 for ten years. It can be used in that
22 Community Board for either new construction
23 of affordable, preservation of affordable,
24 or rehab of affordable, that's it, the only
25 three focuses. If it's not -- if, for some

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2 reason, it can't be used in that Community
3 Board after ten years, then it will go to
4 be used in the borough.

5 Again, for only those three
6 purposes and, you know, my legal team and
7 the City Law Department are working on all
8 of the restrictions that would make sure
9 that that money does stay segregated, but
10 we're confident that we could segregate it
11 out and allow it only to be used for those
12 purposes.

13 COMMR. DE LA UZ: But in an
14 unlikely situation where it wouldn't be
15 used in the borough right away, is there a
16 contemplation of a time period for if it
17 shifted from the Community Board to the
18 borough or --

19 MS. BEEN: We know that that's so
20 unlikely that we are -- we're not
21 providing, but I mean, that would really be
22 a tragedy if that happened and we just
23 don't think that's realistic.

24 THE CHAIRPERSON: Any other
25 questions for Commissioner Been?

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(No response.)

THE CHAIRPERSON: Thank you,
Commissioner Been.

MS. BEEN: Thank you, all.

THE CHAIRPERSON: The next speaker
is James Arnold.

Good morning, Mr. Arnold.

MR. ARNOLD: Good morning. Thank
you very much for this opportunity,
Chair Weisbrod and Commissioners. My name
is James Arnold. I'm a member of the
Volunteer Executive Council of AARP for the
State of New York.

AARP is a social change
organization with 38 million members
nationwide. We have 2.6 million members
here in the State of New York. With me
here today is Chris Rodelo (phonetic), who
is an Associate State Director in charge of
advocacy. He has responsibility for our
programs, membership and operations in the
five boroughs of New York City, where we
have almost 800,000 members who live in
these boroughs. Chris has been the lead on

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2 developing the position for AARP with
3 respect to affordable senior housing, which
4 brings us to this position today, to take
5 this opportunity to tell you what we think
6 and why we think it. I'll be as brief as I
7 can without going into a lot of technical
8 details, but needless to say, we've thought
9 about it a lot before deciding to settle on
10 this.

11 AARP supports Mayor de Blasio's
12 Affordable Housing Plan. We've seen the
13 growing need for affordable housing and the
14 rapid growth and the population of older
15 residents. This plan will help the city to
16 keep pace in supporting the affordable
17 housing need across the five boroughs.
18 Many older New Yorkers are living on fixed
19 incomes and having trouble paying their
20 rent. We know this for a fact. We've done
21 original research over the last three years
22 just in the City of New York leading up
23 particularly to last Mayoral race.

24 2014 survey of New York City
25 voters age 50 and over shows that

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2 affordable housing is a major concern for
3 54 percent of the respondents, far
4 surpassing any other community concern. In
5 communities of color, this number is even
6 higher. Sixty-seven percent Hispanic
7 voters identify as having housing as a
8 major concern.

9 Earlier this year, AARP
10 commissioned another survey of New York
11 City voters age 50 and over, this time
12 expanding the survey pool to include
13 Generation X as well as boomers. Again,
14 affordability was cited as a top concern
15 with 62 percent of boomers and Gen X
16 respondents expressing anxiety over their
17 ability to afford housing in the future,
18 which led to a rather, I guess simplistic
19 expression around the offices which it
20 could be Gen-exit for New York City if
21 we're not careful.

22 This continues to be a concern for
23 communities of color with over 70 percent
24 of African Americans and Hispanics citing
25 worry over their ability to pay their rent

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2 or mortgage in the coming years. These
3 concerns have a potentially devastating
4 effect for the City's population and
5 economic growth and diversity. As
6 61 percent of Gen X and boomer voters said
7 they are actually considering leaving New
8 York City to retire somewhere else because
9 of the lack of affordability.

10 As the City's population continues
11 to age, these are concerns that are likely
12 to grow and we need to act now to ensure
13 that we have safe, quality and affordable
14 housing other older New Yorkers, not only
15 now but into the future. AARP New York
16 believes that the reforms proposed, both
17 ZQA and MIH, are important steps in the
18 creation of more permanent affordable
19 housing for seniors. These measures will
20 help to ensure that New Yorkers 50 and over
21 will be able to remain and live in place in
22 their neighborhoods and communities where
23 they want to be. This a benefit to all New
24 York City residents because they have
25 families. In many cases they have families

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2 older and younger than they are, and will
3 help us to keep the invaluable economic,
4 cultural and community contributions of the
5 older population right here in New York.

6 As this plan moves forward, AARP
7 New York believes it is crucial that each
8 community does have a voice and be invited
9 to be engaged as participants in the
10 community zoning process. This will
11 provide valuable insight into the specific
12 needs of each neighborhood and the
13 residents who live there.

14 Thanks very much for this
15 opportunity to appear, and thank you for
16 the consideration of our position.

17 THE CHAIRPERSON: Thank you,
18 Mr. Arnold.

19 Questions for Mr. Arnold?

20 Ms. De La Uz.

21 COMMR. DE LA UZ: Mr. Arnold,
22 thank you for being here, and I appreciate
23 you sharing your original studies with us.
24 By any chance, did your study also ask what
25 folks incomes were and whether or not they

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had cars registered in the five boroughs?

MR. ARNOLD: I don't know the answer to that but let me ask Chris.

MR. RODELO: So to answer that question, it did -- we are able to tell what the incomes are and I could get the Commission a copy of this research. It did not ask specifically about a car in the neighborhood. This was a broader survey, but housing was certainly part of it.

THE CHAIRPERSON: Any other questions for Mr. Arnold?

Ms. Besser.

COMMR. BESSER: Thank you, Mr. Arnold. In this study, did you happen to receive a breakdown by borough or is it just a statistic for New York as a whole?

MR. ARNOLD: I believe it is broken down by borough.

MR. RODELO: The research that we released in 2014 is broken down by borough and I can send you that excerpt as well. The research that we released this year, I do not believe has the borough-by-borough

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2 analysis, but I will certainly check and
3 send anything that we can along. We do
4 have it broken down by ethnicity and
5 gender, so I will send those individual
6 pieces as well.

7 COMMR. BESSER: Thank you.

8 THE CHAIRPERSON: Any other
9 questions for Mr. Arnold?

10 (No response.)

11 THE CHAIRPERSON: Thank you very
12 much.

13 The next speaker is Sharon
14 Cromwell.

15 MS. CROMWELL: Good morning, the
16 members of the City Planning Commission.
17 Thank you for the opportunity to testify
18 today. My name is Sharon Cromwell, and I'm
19 the new Development Lead at SEIU 32BJ, here
20 to represent 70,000 working people here in
21 New York City. They are maintenance
22 workers, doormen, security guards and
23 building service staff. They serve in the
24 buildings that hundreds of thousands of New
25 Yorkers call home. Like all working people

Proceedings

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2 in this City, they're finding it harder and
3 harder to afford to continue living in
4 their homes.

5 Right now, as 30,000 32BJ
6 commercial workers are bargaining for a new
7 collective bargaining agreement, we are
8 asking ourselves how we can make sure the
9 contract our members fight hard for allows
10 them to afford decent housing in the City.
11 That's why we're standing behind Mayor de
12 Blasio's plan to build and protect 200,000
13 affordability apartments, and it's why
14 we're here today to support two key parts
15 of the plan that are now up for debate.

16 The first change will make it
17 mandatory to build permanently affordable
18 housing in any new rezoning. For years we
19 have stood beside communities during the
20 rezoning process, demanding developers
21 include affordable housing in a proposed
22 fully market or luxury development. Under
23 Mandatory Inclusionary Housing, that
24 expectation is built in. Developers can't
25 put a shovel in the ground without allowing

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2 affordable housing for working class
3 families in return. No more promises that
4 developers can break or walk away from.

5 The other change we support will
6 update long outdated rules that make it
7 unnecessarily costly and difficult to build
8 new affordable housing. The Mayor's
9 reforms will maximize the affordable
10 housing we can build in our neighborhoods
11 and pave the way for new larger and well
12 designed senior housing and assisted living
13 developments, which we need as our members
14 age and retire.

15 We support these proposals knowing
16 that they are components of a larger
17 comprehensive affordable housing strategy.
18 This is a strategy that includes subsidies
19 to build deeper levels and higher
20 percentages of affordable housing, which
21 include housing for people making as little
22 as \$18,000 a year, as well as aggressive
23 tenant protection and Affordable Housing
24 Preservation Program.

25 Our members feel the same worry

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2 and anxiety that all New Yorkers do. Our
3 members live in East New York, they live in
4 Jamaica, the live in the Bronx and in
5 Harlem. Like most working New Yorkers,
6 they worry about whether they'll be able to
7 afford their homes a year from now, or
8 whether their neighbors and communities
9 will be priced out. So we can solve this
10 problem if we build a new generation of
11 affordable housing, and for these reasons
12 we support the two proposals. Thank you.

13 THE CHAIRPERSON: Thank you very
14 much, Ms. Cromwell.

15 Questions for Ms. Cromwell?

16 (No response.)

17 THE CHAIRPERSON: Thank you.

18 The next speaker is Colvin Grannum
19 from Bedford Stuyvesant Restoration.

20 MR. GRANNUM: Good morning,
21 Commissioners. How are you? It's a
22 pleasure to be here.

23 As you know, or you may know,
24 Bedford Stuyvesant Restoration is
25 recognized as the nation's first community

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2 development corporation. We are a
3 comprehensive community development
4 corporation, meaning that we do everything
5 from owning and managing commercial real
6 estate to owning affordable housing,
7 including senior housing, job training, job
8 placement. We have an integrated model
9 that includes financial coaching and
10 counseling. We're very focused on energy
11 conservation and on upward mobility for the
12 residents of Central Brooklyn.

13 For more than two decades we were
14 substantially a housing developer. We
15 developed over 2,000 units of housing,
16 mostly low income and home ownership. Over
17 the last decade and a half, we've been
18 focused on the human capital aspects of
19 upward mobility. I'm here to commend the
20 de Blasio Administration for proposing
21 Mandatory Inclusionary Zoning. It's a
22 vision of a city that promotes equity
23 through upward mobility and the economic
24 composition of neighborhoods as a key
25 factor in whether residents have a

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2 realistic opportunity for upward mobility.

3 I also want to commend the
4 Administration for the quality of the data
5 developed on the state of the City's
6 housing market, including recent and
7 projected trends related to migration
8 patterns, displacement and economic --
9 diversity on the neighborhood level. If
10 there's a theme to my remarks, it's regret.
11 In 2007 or '08, Bedford Stuyvesant
12 underwent rezonings and included every --
13 Mandatory Inclusionary Zoning was not an
14 element of those, nor was the Zoning
15 Quality. And we have seen and we're living
16 the consequences of that.

17 In our view, housing and education
18 integration both economic and racial
19 integration are among the most sensitive
20 and perhaps volatile issues in the nation
21 and the city. But they also hold the key
22 to unlocking equity and reversing
23 discrimination --

24 Two main points that I want to
25 leave with you: The City of New York has a

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2 responsibility to undo the public and
3 private sector policies and practices that
4 have led to the highest levels of economic
5 and racial -- that have lead to high levels
6 of economic and racial segregation of
7 housing in the city and in public
8 education. We need to create a truly mixed
9 income city.

10 The second point is that public
11 sector intervention in the housing market
12 needs to happen quickly because market
13 forces are ahead and I would dare say way
14 ahead of policy and accelerating at a rapid
15 pace. Urgent action is required. In other
16 words, again, I regret that Mandatory
17 Inclusionary Zoning was not an element of
18 the Bedford Stuyvesant rezoning.

19 I'm most familiar with the
20 northern and central Brooklyn communities
21 of Fort Greene, Clinton Hill, Bedford
22 Stuyvesant and Crown Heights. I was born
23 in Bedford Stuyvesant and raised in Clinton
24 Hill and owned a home in Crown Heights.
25 Private -- today, I'm witnessing private

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2 and global investment flooding these areas
3 as measured by the volume of transactions
4 and the growth in sales prices. These
5 things are reported almost weekly in the
6 New York Times and other real estate
7 publications.

8 What I see on a daily basis is not
9 just that low-income and very low-income
10 people are going without housing or feeling
11 the pressures of a city that's growing at a
12 rapid rate, but people who have incomes
13 between 40 and 90,000 are being shut out
14 for the housing market.

15 Wow. That was quick.

16 Even at \$2,300 per month, a
17 two-bedroom apartment is difficult to find.
18 Studios are renting for at least 1,300. So
19 I guess if I was an elected official maybe
20 I would get some more time, but I think you
21 get my point.

22 THE CHAIRPERSON: Or a high level
23 appointed official.

24 MR. GRANNUM: I got a couple of
25 more pages, but what I would say is you got

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2 the substance of our remarks. I'm here to
3 support the MIH and I'm also here to
4 endorse my colleagues who are supporting
5 ZQA as articulated by HPD.

6 THE CHAIRPERSON: Thank you very
7 much, Mr. Grannum.

8 Are there questions for Mr.
9 Grannum?

10 Ms. Ortiz.

11 COMMR. ORTIZ: Hi. Good morning.

12 MR. GRANNUM: Good morning.

13 COMMR. ORTIZ: You know, I think
14 you have a unique vantage point because you
15 are in a community and you've seen up close
16 in Bed-Stuy and central Brooklyn the
17 changes that have occurred absent a policy
18 on affordable housing. So you're almost
19 looking at the no action scenario.

20 MR. GRANNUM: Correct.

21 COMMR. ORTIZ: Could you speak a
22 little bit to, you know, the changes you've
23 seen as a result of no action and perhaps,
24 you know, how MIH, if applied, would have
25 made a difference in your -- from your

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perspective?

MR. GRANNUM: Yeah. So there are a couple of things. You know, we look at the community now at the census tract level and if you look at Fort Greene, Clinton Hill, Bedford Stuyvesant, and to some extent Crown Heights, you will see growing affluence in some census tracts, especially the low density census tracts, and then other census tracts, many of which contain housing and a lot of publicly supported low income housing. Those census tracts you see an increase in poverty and an increase in overcrowdedness.

We focused, back in 2008, on Fulton Street, which is a -- transit-oriented corridor. We saw an opportunity to increase densities while most of the community was arguing for low density, and mind you, most of the community is progressive and is concerned about affordability but they wanted low density. We were able to get some high density increases on Fulton Street

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2 commercial corridor.

3 There was a voluntary or bonus,
4 inclusionary bonus, and so we were able to
5 utilize that on a few projects, but as the
6 housing prices -- as the prices of real
7 estate accelerated over the following
8 years, all of the developers and owners
9 opted to build market-rate housing without
10 incorporating the bonus. And so what
11 we're -- it's transit-oriented so everybody
12 who wants to live along the subway line, on
13 the bus line, and so what we're seeing now
14 is the growth of market-rate projects where
15 we really had an opportunity to generate
16 some diversity.

17 THE CHAIRPERSON: Ms. Levin and
18 then Ms. De La Uz.

19 COMMR. LEVIN: Mr. Grannum, it's
20 really wonderful to have the perspective of
21 someone who has worked in a neighborhood
22 level, particularly in the neighborhoods
23 you're working in that have seen such
24 change of the kind that we're talking about
25 that have brought us to be considering

Proceedings

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2 these proposals.

3 You know, reading the breadth of
4 criticism of these two programs, it seems
5 to me, as I said before, that there is
6 broad support for Mandatory Inclusionary
7 Housing as a policy matter, and there is
8 genuinely broad support for improving the
9 way our zoning resolution works to
10 facilitate the production of affordable
11 housing, but the criticism is that there
12 are so many problems with the details that
13 we shouldn't move forward, that the ideas
14 may be good ones, but these particular
15 proposals have so many problems that we
16 should say no at this point.

17 What would you -- you've obviously
18 looked at that. I suspect there are some
19 of the details that you're not so
20 enthusiastic about either. What would you
21 say -- how did you get to a yes on this?

22 MR. GRANNUM: Well, I really have
23 considered the criticisms and the way I get
24 to a yes, and I'm not being dismissive of
25 the criticisms because we can always use

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2 deeper affordability, but I would say doing
3 nothing decides things and it decides
4 things probably for the next 20 or
5 30 years.

6 I have people who work for me --
7 not that work for me, they work for Bedford
8 Stuyvesant Restoration -- they make 40, 50,
9 60,000 dollars. They live in New Jersey.
10 They cannot find a place to live in Bedford
11 Stuyvesant. And I would think that that's
12 true of a lot of the local businesses and
13 institutions in Bedford Stuyvesant. They
14 are paying a decent wage. I really dislike
15 the either/or context that this is
16 sometimes placed in because people who are
17 making 30 -- who make 40 or 50,000 dollars,
18 pick a number that's not low-income, they
19 feel the pressure in the same way, they
20 feel the same anxiety, and I think we need
21 them to balance out the communities. They
22 play a helpful role in the community.

23 So my point of view is that we
24 have to do something because the market
25 will shape these things in a way that

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nobody likes.

(Whereupon, Garry Torres replaces
Jennifer Cassella as the hearing reporter.)

THE CHAIRPERSON: Ms. De La Uz.

COMMR. DE LA UZ: Thanks for
being here, and thanks for all of the work
that Bed-Stuy Restoration does on behalf
of residents of Brooklyn and beyond. I
appreciate the broad picture and I
absolutely understand the imperative to
act, especially considering what has been
going on in your neck of woods in
Brooklyn.

I'm just wondering if we could
turn for a second, and I don't know if
you're prepared to share this information
or not, but I believe Bed-Stuy has 202.

MR. GRANNUM: Yes, we do.

COMMR. DE LA UZ: What's the
parking like at your 202?

MR. GRANNUM: I don't know if
you want to hear this. I think we have
probably 15 spaces and maybe three or four
cars. But that was also true of a

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2 non-202, just, you know, that we had along
3 Fulton Street, where we had maybe
4 20-some-odd spaces, and maybe six to seven
5 cars. So I think that -- look, I could
6 just tell you what my experience is, and I
7 would say that there does seem to be some
8 mismatch, especially along the transit
9 corridors and especially for low-income
10 folks with the provision for parking
11 spaces and the actual utilization.

12 COMMR. DE LA UZ: Great. Thank
13 you.

14 THE CHAIRPERSON: Any other
15 questions?

16 Ms. Efron.

17 COMMR. EFFRON: Thanks again.

18 Capitalizing on your grassroots
19 neighborhood experience, it was
20 interesting to hear the gentleman from
21 AARP talk about the sort of older sandwich
22 generation of those with younger and older
23 residents. Knowing a little bit about the
24 neighborhoods you represent, there seem to
25 be quite a large amount of that, and

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2 knowing that you also mentioned census
3 tracks that you're looking at very
4 carefully.

5 Are you seeing a large exit of
6 the elderly from your neighborhood or --
7 and do you assume it's because of
8 affordability? Is this something that's a
9 concern?

10 MR. GRANNUM: Absolutely. And
11 what's interesting to me is that almost at
12 all income levels, because the expense is
13 so high.

14 So I'll give you an example that
15 might not make intuitive sense to many
16 people: A person will sell their
17 brownstone for a million-five. They're
18 are heading out of town because they can't
19 afford anything comparable at a
20 million-five in New York City any more.
21 That doesn't really -- you would think
22 that they would have an opportunity to
23 stay, but they can get a lot more money --
24 a lot more bang for their buck in
25 Charlotte or some other place. And then

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2 we just have who are -- I mean, across age
3 ranges, but particularly the elderly who
4 are returning South. And this is -- you
5 know, we haven't done aggregate data, but
6 we hear about these things every single
7 day.

8 THE CHAIRPERSON: Any other
9 questions for Mr. Brown?

10 Mr. Brown, thank you so much,
11 and please submit the remainder of your
12 testimony that we --

13 MR. GRANNUM: I'll have it typed
14 first, thank you.

15 THE CHAIRPERSON: Okay. Fair
16 enough.

17 The next three speakers are
18 elected officials: First, Borough
19 President Ruben Diaz, followed by Assembly
20 Member Deborah Glick, followed by Council
21 Member Rosie Mendez.

22 And then the five following
23 speakers will all be in opposition. I'll
24 just read their names so they'll be
25 prepared: Maritza Silva-Farrell, from

Proceedings

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2 Real Affordability For All, John Medina,
3 from Community Voices Heard and also from
4 Real Affordability for All; pearl Barkley,
5 from Community Voices; Carl Johnson and
6 Carrol Turner, from New York City
7 Community Alliance for Workers Justice.
8 And that would be speakers 6 to 10 after
9 the three elected officials.

10 So first welcome Mr. Borough
11 President.

12 MR. DIAZ: Good morning,
13 Mr. Chairman, Chairman Weisbrod, to all
14 the Commissioners, and to all in
15 attendance here today. I just want to
16 start off by wishing everyone a happy
17 holidays.

18 THE CHAIRPERSON: And to you as
19 well.

20 BOROUGH PRESIDENT DIAZ: Thank
21 you.

22 I'm here today to testify in
23 opposition to the pair of zoning text
24 amendments that have been put forward by
25 this Administration and the Department of

Proceedings

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2 City Planning known together as, Zoning
3 for Quality and Affordability, or the ZQA,
4 and the Mandatory Inclusionary Housing,
5 MIH. These text amendments pose an
6 abundance of concerns and questions by my
7 office, the Community Boards, advocacy
8 groups, elected officials and others from
9 all points on the spectrum of the
10 development and public policy community.
11 These concerns were underlying at the
12 recent meeting of the Bronx Borough Board,
13 where they were unanimously rejected for a
14 wide variety of reasons.

15 The submission of over 500 pages
16 of text amendments at the same time is an
17 unreasonable burden on most Community
18 Boards to adequately review and evaluate
19 their local neighborhood impact. These
20 text amendments will govern land use
21 development for our city for decades to
22 come, and should not be adopted in such a
23 short period of time. Something so
24 profound as the future development of the
25 City cannot be rushed. Achieving our

Proceedings

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2 city's affordable housing goals cannot be
3 accomplished in a vacuum.

4 Our goal as a city should not be
5 just to achieve a goal of 200,000 units of
6 housing. I support that goal, but it
7 should not be just to do that but to meet
8 the individual needs of each and every
9 community in the City.

10 AUDIENCE SPEAKER: Yes.

11 BOROUGH PRESIDENT DIAZ: Allow-
12 ing just 60 days for our Community Boards
13 to weigh in on these proposals, in our
14 opinion, is disrespectful to the Community
15 Boards, their members and the
16 neighborhoods they serve, and goes against
17 the spirit of progressive, inclusionary
18 and transparent government.

19 Despite the impact that these
20 combined proposals will have on density,
21 there has been no serious discussion of
22 the social and physical infrastructure
23 necessary to manage the development for
24 which these zoning plans allow. Are there
25 enough school seats for the children

Proceedings

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2 accompanying their parents as they move
3 into new affordable units? What will be
4 the impact on transportation in these
5 communities? Will additional services be
6 provided for our seniors? Will new green
7 and public spaces be provided for new
8 residents? What kind of jobs will be
9 created with this development?

10 AUDIENCE SPEAKER: Yeah.

11 BOROUGH PRESIDENT DIAZ: How can
12 we totally eliminate parking requirements?
13 Will neighborhood residents even be able
14 to get these new apartments, the people
15 that live in the neighborhoods? These
16 questions and many others have gone asked
17 and unanswered.

18 Additionally, the proposal as it
19 stands will not fully realize the goal of
20 truly mixed-income communities. For
21 example, a mix of specific income levels
22 covering a broad range from very low to
23 moderate incomes within market rate
24 developments should be considered. This
25 range, rather than income averages, would

Proceedings

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2 create the true mixed-income neighborhood
3 that this proposal hopes to achieve.

4 The neighborhood-by-neighborhood
5 approach to planning has been very
6 successful in The Bronx, and these text
7 amendments will undermine that success.
8 Commissioner Been has been a part of the
9 success that we've accomplished over the
10 last six years, at least, in the
11 neighborhood-by-neighborhood approach.

12 The borough has adopted no less
13 than 14 rezonings since 2009, yet these
14 proposals will reshape the zoning of the
15 City with one broad stroke. One size does
16 not fit all. One size does not fit all
17 for the whole city. One size does not fit
18 all for The Bronx.

19 AUDIENCE SPEAKER: That's right.

20 AUDIENCE SPEAKER: That's right.

21 BOROUGH PRESIDENT DIAZ: Local
22 planning efforts reinforce the principles
23 of inclusion and transparency, and can
24 also mitigate displacement and preserve
25 neighborhoods. These principles have been

Proceedings

1
2 successful previous rezoning, and they
3 must be respected moving forward.

4 This Administration has said
5 that MIH and ZQA are the only way to
6 mitigate the problems of displacement that
7 can come with gentrification in New York
8 City. This is simply not the case. While
9 affordable housing is key, these
10 amendments as they stand are not the way
11 to accomplish affordable housing for all
12 New Yorkers. There are multiple issues
13 with the proposed amendments. We need to
14 find a way to assure that Bronx residents'
15 needs and all New Yorkers' needs are met
16 by new zoning, and this proposal -- these
17 proposals do not achieve those ends.

18 Now, while it has been said that
19 changes will be made to these text
20 amendments in light of community concerns
21 raised regarding their implementation, we
22 have not seen those changes yet; and
23 therefore, as currently written, I cannot
24 support these zoning text amendments, MIH
25 and ZQA, and I strongly recommend that the

Proceedings

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2 Planning Commission vote to defeat these
3 proposals.

4 Thank you.

5 (Applause.)

6 THE CHAIRPERSON: Thank you.
7 Thank you, Mr. Borough President.

8 Questions for the borough
9 president?

10 Mr. Marin.

11 COMMR. MARIN: Not a question.
12 Moreover, I just want to thank you for
13 your time, I know you have a very busy
14 schedule, and for your thoughtful
15 testimony this morning.

16 BOROUGH PRESIDENT DIAZ: Thank
17 you.

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19 THE CHAIRPERSON: Yes, and thank
20 for your patience.

21 BOROUGH PRESIDENT DIAZ: Thank
22 you.

23 THE CHAIRPERSON: I know you
24 were here at the very beginning.

25 Other questions for the borough

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president?

Ms. De La Uz.

COMMR. DE LA UZ: Borough

President, thanks for being here. I know we have the information specific -- the recommendations that you have, but I just wonder if you wanted to highlight the key recommendations that you have for MIH and ZQA changes?

BOROUGH PRESIDENT DIAZ: So

first of all, a lot of it, when you listen to people in The Bronx and throughout the City of New York, obviously, when you speak of MIH and inclusionary housing -- and by the way, we've done a lot of that but what we are concerned of, is when we say one size does not fit all is, in The Bronx alone, we have been able to do low-income housing in some areas lower than the 60 percent MI -- of AMI. We've been able to do it lower. And just a few weeks ago we did a building where it was 30 percent of AMI. Those people will be -- those people who can -- who need to

Proceedings

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2 go into those units would be locked out of
3 this.

4 At the same time, there are
5 parts The Bronx and throughout the City of
6 New York where we want to see, as was
7 testified here earlier, we want to see
8 more of our professionals be able to stay.
9 See, in my borough, at least, what we've
10 been experiencing for so many decades is
11 that people get educated, they have
12 careers, and they cut and run. I want to
13 be able to retain those professionals.

14 But, when you speak of
15 120 percent of AMI, the higher of AMIs,
16 two things here: With this proposal, I'm
17 not sure that a developer is going to want
18 to be incent- -- or is going to feel
19 incentivized to come into The Bronx,
20 especially when we don't have or the City
21 does not have the amount of subsidies for
22 the higher of AMI.

23 See, the higher of AMI may work
24 in another borough, but in the City of New
25 York, as we saw on 138th Street with a

Proceedings

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2 particular development, it was like
3 pulling teeth to get the City to be able
4 to accept a higher of AMI, and we all know
5 that that part of The Bronx is really
6 flourishing.

7 We feel that on ZQA, when you
8 speak of parking; a lot has been said of
9 parking this morning, all been surrounded
10 around seniors. All right, let's talk
11 about the senior developments and where
12 seniors live. First of all, maybe the
13 senior themselves don't have vehicles, but
14 what about the family members that visit
15 them? What about the people who are
16 employed in those facilities and they have
17 to go around for hours searching for
18 parking?

19 And for somebody to suggest that
20 if you have less parking space, that it
21 somehow is going warm the developer's
22 heart to do some green space, no they're
23 not; they're going to do more and more
24 units.

25 And when you speak of parking,

Proceedings

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2 remember that it's not just seniors, but
3 we're talking about low-income housing
4 units here today, and the reality is that
5 those developments also need parking
6 spaces, because if they don't have it,
7 it's going continue to burden the
8 surrounding community who are already
9 finding it a tough time to find parking
10 around.

11 And then, last but not least,
12 let me just say this, just about what's
13 in the details here. It's also about
14 process. What we all, and whether we
15 stand on the same of the issue or not, we
16 all want the best for our city. We are
17 all here together to try to plan for 30,
18 40, 50 years from now. For them, for the
19 Community Boards and for the communities
20 to be told to digest 500 pages, a thousand
21 pages in 60 days for -- in order to make a
22 as to what the City and the neighborhood
23 is going to look like for decades to come,
24 we take umbrage to that.

25 (Applause.)

Proceedings

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THE CHAIRPERSON: Thank you.

Any?

Ms. Ortiz.

COMMR. ORTIZ: Hi. Good morning, Borough President.

BOROUGH PRESIDENT DIAZ: Good morning.

COMMR. ORTIZ: I have a question. Something I've been, you know, thinking about, obviously, you said sort of the one size fits, all that's come up a lot.

BOROUGH PRESIDENT DIAZ: Right.

COMMR. ORTIZ: You know, the concern about how this proposal, you know, in one fell swoop is going, you know, change things. And I wondered, because one of the things that's come up is that this is attached to any individual rezoning. So in those rezonings as, you know, Commissioner Been mentioned, you have another opportunity to serve unpacked issues and address community concerns through another public review process.

Proceedings

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2 And do you see those as additional
3 opportunities to sort of weigh in on this
4 and customize it a little?

5 BOROUGH PRESIDENT DIAZ: What
6 I'm saying, Commissioner Ortiz, is that,
7 right now when you look at what we've
8 done, at least in my borough, over the
9 last six years -- we've done over
10 seven- -- close to 17,000 new units of
11 housing and we've done it by a
12 neighborhood-by-neighborhood approach and
13 it works the way that we've been doing it,
14 where we don't want a developer to
15 automatically assume that all they have to
16 do with the options that are given to them
17 by what these proposals or these text
18 amendments are offering. What they need
19 to do is, what we've been doing is, having
20 them community-by-community, neighborhood-
21 by-neighborhood adopt what we feel is the
22 right fit.

23 So whether in some areas -- so
24 for instance, if we do new zonings moving
25 forward, how do I hold a developer -- or

Proceedings

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2 how does a community hold a developer's
3 feet to the fire to do lower of AMI? Or
4 what about if we want higher of AMI, how
5 do we hold them to their feet if they are
6 just going to follow the letter of the
7 law, so to speak, with these text
8 amendments?

9 We believe that also moving
10 forward, a lot of times what we see in The
11 Bronx is that we've been able to plan with
12 what I call, planning with purpose. And
13 in order for you to have a certain level
14 density, a certain level of housing units,
15 we also try to take care of the peripheral
16 issues that I mentioned in my comments.
17 What is it going to mean for the local
18 police precinct, the local police
19 department? What is it going to be for
20 the schools in the area?

21 Now, I know there's been
22 mentioned here that this money, this
23 billion dollars. But the fact is that a
24 lot of that money is going to go to the
25 infrastructure, like we are doing on the

Proceedings

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2 149th Street and 138th Street corridor of
3 the Harlem River. That's going to take up
4 a lot of the billion dollars. It's not --
5 it doesn't really speak to some of the
6 other services that the community is going
7 to need once they live in there.

8 And so, what we're saying is,
9 moving forward, as we are doing rezonings,
10 let's not just have this approach where
11 your just giving developers this template,
12 and then they can feel like they can
13 totally disregard the specific needs based
14 on that neighborhood and community moving
15 forward.

16 THE VICE CHAIRMAN: Question?

17 THE CHAIRPERSON: THE VICE
18 CHAIRMAN.

19 THE VICE CHAIRMAN: Borough
20 President, good to see you this morning.

21 BOROUGH PRESIDENT DIAZ: Good to
22 see you.

23 THE VICE CHAIRMAN: And thank
24 you for your testimony.

25 BOROUGH PRESIDENT DIAZ: I

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appreciate it.

THE VICE CHAIRMAN: And I hear very clearly your concerns about the density in terms of text. But I'm sure you are aware, I'm certain you are aware of the patterns that are emerging into The Bronx; developers who heretofore would not have looked at the borough, and now coming in, particularly in Port Morris, those areas, and are buying large parcels where we can anticipate there will be market-rate housing.

Are you concerned at all that further deliberation, which certainly is appropriate, but in not adopting of some modifications of the current zoning would allow housing to be developed in the borough that is market rate and to then skew or accelerate the gentrification and further intensify the kind of unaffordability that I know you are concerned about, as we all are.

BOROUGH PRESIDENT DIAZ: So two points there. The parcels of property

Proceedings

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2 that have been purchased and that we read
3 about that are going to be developed,
4 they're not going to go through the NA
5 ULURP process. They're going to build
6 as-of-right, number one.

7 THE VICE CHAIRMAN: Right.

8 BOROUGH PRESIDENT DIAZ: So I
9 don't believe that these text amendments
10 would apply.

11 Number two, when we speak of
12 gentrification, I don't subscribe to the
13 notion that gentrification is where you
14 have to force people out. People in my
15 borough, as you well know, Commissioner,
16 are professionals. People in The Bronx
17 have combined incomes where they're making
18 too much money for very low income or
19 affordable housing units, and they don't
20 make enough to, say, buy a house in either
21 Riverdale or Pelham or Throgs Neck, and
22 they are looking for some type of housing,
23 in this case, where there is market rate
24 or higher AMI, that they deserve, that
25 they will feel proud of living in.

Proceedings

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2 As it pertains to a
3 gentrification. It's a very, you know,
4 we -- I disagree with gentrification. I
5 don't want gentrification. I want to be
6 able to build in my borough and have the
7 people in The Bronx stay there and that's
8 complicated. That means a lot of
9 different things.

10 (Applause.)

11 BOROUGH PRESIDENT DIAZ: And it
12 should not be done in 60 days or with one
13 size fits all. Some things work in some
14 neighborhoods and will work in some
15 neighborhoods, but they will not work in
16 others.

17 So, as for The Bronx, if you
18 look at where we have been examining to
19 rezone, the Jerome corridor. I don't want
20 market rate in Jerome corridor. I believe
21 that it has to be lower income there. And
22 the people in the community don't want
23 market rate there. But we do want a mix
24 of higher AMI.

25 How do I get a developer to go

Proceedings

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2 30 percent of AMI and then some developer
3 also do some mix so they can even go a
4 little bit higher? I don't know if this
5 -- if these text amendments would give us
6 leverage as a community, working with the
7 elected officials, working with the
8 Community Boards, with the advocates the
9 way that we have been doing in order to
10 obtain those goals.

11 THE CHAIRPERSON: Ms. De La Uz.

12 COMMR. DE LA UZ: I appreciate
13 that the belief is that -- I'm going to
14 speak specifically to MIH -- that by
15 establishing a floor of 25 or 30 percent
16 affordability in the project after a
17 neighborhood rezoning, that somehow you
18 feel that might constrain the discussion
19 that happen with a particular developer.

20 I'm just wondering, in the
21 discussions that we've had thus far with
22 absent MIH, have you been able to achieve
23 more than 30 percent affordability?

24 BOROUGH PRESIDENT DIAZ: More?

25 Yes, we have. But we've been doing that,

Proceedings

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2 again, depending on, you know, the
3 different communities.

4 COMMR. DE LA UZ: Obviously, I
5 assume in some cases there's pretty
6 significant public subsidy dollars in
7 those projects to achieve a higher
8 percentage of affordable.

9 BOROUGH PRESIDENT DIAZ: And I
10 wish there were even more subsidies. So
11 in some cases, we haven't been able to
12 achieve that, and like I said earlier, in
13 a project 138th Street, it was like
14 pulling teeth to get the City to be able
15 to except a little bit higher, just to get
16 to 80 or 100 percent of AMI.

17 So again, what this will do here
18 is it would enable, say, a developer in
19 Manhattan to easily choose to do
20 120 percent or 100 percent of AMI, how do
21 we hold a developers feet to fire in The
22 Bronx in certain neighborhoods to be able
23 to do that?

24 So the subsidy is not there, and
25 unless you allow us with the community

Proceedings

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2 pressures and the elected officials and
3 the advocacy that we can have, the
4 developer may say, you know what? I don't
5 want to do that. That doesn't work here.

6 COMMR. DE LA UZ: So I think the
7 big point, I think, is the -- some level
8 of commitment from the Administration to
9 reach a broader range of affordability, in
10 particular, at the deeper ends of
11 neighborhood rezoning when it comes up, so
12 that you have the diversity that you're
13 seeking.

14 BOROUGH PRESIDENT DIAZ:
15 Commissioner, I think that this has to
16 have -- you have to have more
17 conversations about a myriad of different
18 areas, and I think that that's the
19 problem.

20 So again, whether it's folks
21 that want to concentrate on AMI, MIH or
22 the ZQA, there are so many different
23 conversations that are happening. When
24 you get people from the low-income
25 advocacy groups who are against these text

Proceedings

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2 amendments, side with those -- you know,
3 the remedies of the world, it tells you
4 something. It means that we have to have
5 more conversation here. And I'm willing
6 and prepared to do that.

7 And The Bronx, and I'm sure that
8 so many people here today to voice their
9 opinion, their opposition in these text
10 amendments, we are all prepared. So we
11 just need to slow down a little bit. And
12 we need to, you know -- I mean, for
13 instance, there was a lot said today by
14 the Deputy Mayor on moving forward, but
15 those are things that we just just don't
16 see in the proposals as they are. And
17 until that time comes, until we see that
18 they've been amended, until we see that
19 we've been heard as a New York community,
20 as New Yorkers, then I would suggest and I
21 would urge that you vote no. And if we
22 need to start over, then we need to start
23 over.

24 But, that's to say that, even
25 though someone may make the argument that

Proceedings

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2 we start over, you know, we -- people are
3 going to be left out, we're doing
4 development. Where making -- we're doing
5 units, almost every week now, we're
6 cutting a ribbon in The Bronx. So it
7 won't stop the process of putting roofs
8 over people's heads. But there's a lot of
9 conversation, whether it's having more of
10 subsidies for higher of AMI, whether it's
11 making sure that we have lower of AMI in
12 some neighborhoods, parking for low income
13 or for seniors, you know, these are all
14 conversations that need to be had. And I
15 hope that by the time it gets to City
16 Council, at least, that, you know -- we
17 have been able to check at least most of
18 those boxes.

19 THE CHAIRPERSON: Any other
20 questions for President Diaz?

21 Thank you very much, and,
22 Borough President, I --

23 BOROUGH PRESIDENT DIAZ: Thank
24 you very much.

25 THE CHAIRPERSON: Mr. Borough

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President --

The next speaker, who's actually another elected official, Borough President Melinda Katz is here, and so Borough President Katz is going to go next, and then Assembly Member Glick, and then Council Member Rosie Mendez.

(Applause.)

BOROUGH PRESIDENT KATZ: Good morning, Commissioners. Hi, everyone.

My name is Melinda Katz. I am not only the Borough President, I'm the former Chair of the New York City Council's Land Use Committee. I want to acknowledge, of course, Irwin Cantor, our Queens representative, as well as Carl Weisbrod, our Chair. And I appreciate all the time that it's going to take to make this right. And I have no doubt that at the end of the day, everybody wants to make this right.

And I commend the Mayor and Department of City Planning, and HPD for all the work that they have done, and I do

Proceedings

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2 think that it's an amazing thing what has
3 happened with this discussion. For the
4 first time, and I've been doing this
5 20 years -- I started when I was 10 --
6 I've been doing this 20 years. And
7 literally, I don't remember a time in
8 government when the entire city was
9 talking about affordable housing, when the
10 entire city said, you know what? Enough's
11 enough; we need to build the housing, we
12 need to get it done. And I think that
13 it's not a bad thing that everyone has a
14 different opinion on the right way to get
15 there.

16 We need affordable housing for
17 our families. We need affordable housing
18 for our seniors. I do think the
19 Commission has attempted to get there. I
20 hope, because I know the process very well
21 as the Chair of the committee, that
22 between now, and the time that the City
23 votes on this, there are great
24 opportunities to amend this legislation.
25 And I do suggest that the Commission takes

Proceedings

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2 the testimony today very seriously.

3 Based upon feedback and comments
4 that I received and via letters and
5 e-mails to my office, the responses of the
6 majority of Queens Community Boards, the
7 Queens Borough Board discussion and vote,
8 their major concerns about the bulk, and
9 how it affects the built character and
10 quality of life in many of our
11 neighborhoods.

12 Just so you know, we have
13 invested decades of time, and effort to
14 preserve our communities; literally
15 decades over 40 neighborhoods in Queens
16 were contextually rezoned in the last
17 decade alone. Each of those neighborhoods
18 were extensively engaged to determine the
19 best zoning to map on an almost a
20 block-by-block basis. Every community was
21 engaged in this process. Some of the ZQA
22 proposals will undue the that work. For
23 instance, allowing taller, bulkier
24 buildings in our low density neighborhoods
25 would negatively impact those areas.

Proceedings

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2 Many of the rezonings occurred
3 while I was a member of the City Council
4 and Chair of the Land Use Committee. In
5 other major rezonings we were able to
6 negotiate and generate affordable housing
7 in Williamsburg, Hudson Yards and Willets
8 Point, and those are just a few of the
9 examples. While I was Chair, we went
10 through dozens of neighborhoods to rezone
11 them, and what we would do is we would try
12 to rezone in an upzone the avenues, and on
13 the streets, we would side -- we would
14 downzone the community as well. So you
15 ended up really with a balanced
16 neighborhood. And I guess most
17 importantly, though, it was done
18 neighborhood-by-neighborhood and still we
19 got affordable housing.

20 And I'm doing this by memory,
21 but in Greenpoint I think it was
22 33 percent; in Hudson Yard Yards it was
23 28 percent; in Willets Point it was 33 1/2
24 percent; and so, in Astoria Cove, we just
25 did without the mandatory, and I think it

Proceedings

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2 ended up being 28 percent. So there are
3 ways to do this without a blanket rezoning
4 across the board.

5 Another issue that has been
6 raised is the Termed Financing Programs
7 for Affordable Independent Senior Housing,
8 not built a mandatory inclusionary, might
9 not remain affordable permanently once the
10 term of the financing as expired. Seniors
11 are coming by the thousands to Queens to
12 settle. They need a place to live and it
13 needs to be a permanent senior, affordable
14 housing provision. And so that's of great
15 concern that it gets timed out.

16 But one of the most common
17 concerns, bar none, that I have heard, is
18 the reduction of parking requirements
19 within the transit zones that would
20 negatively impacts those areas. Because
21 in Queens, the transit system does not
22 cover the entire borough. Only one-third
23 of our borough is covered by subways. As
24 a result, our residents rely heavily on
25 their cars, much to the dismay of many New

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York City folks in government, and we know that, but it's part of our daily routines. Availability of parking in the many of the proposed transit zones is already an issue. While waiving the parking requirements for a single building may be inconsequential, the cumulative effect is going to be drastic on the borough of Queens.

We also need, as we go through this process, discussion of how to make sure that as we create these hundreds of thousands of affordable housing units, we also make sure that they are done by qualified professional programs and builders and workers. We want to make sure that we have apprenticeship programs.

(Applause.)

BOROUGH PRESIDENT KATZ: We do want to make sure that as all of these houses are being built, in however we end up at the end of the process, that those buildings are professional and well done. And I do find that the training programs

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2 and apprenticeship programs have been key.

3 The majority of 14 Queens
4 community boards have overwhelmingly
5 disapproved MIH and ZQA. At this time
6 I'm opposed to the proposals in their
7 present form; however, the hearing today
8 is another phase of the review process for
9 these proposals.

10 And I will end with this: I do
11 think that the City Planning Commission
12 has done an amazing job to reach out to
13 the community. And I do thank you for
14 that and I do think that it's a role model
15 for others.

16 I do, however, believe that
17 during this process between now and
18 between the City Council vote, there is so
19 much opportunity to amend these provisions
20 and amend this process and this
21 legislation in order to make it better for
22 the individual communities, because New
23 York City at its core is a city of
24 neighborhoods.

25 Thank you very much.

1 Proceedings

2 THE CHAIRMAN: Thank you.

3 BOROUGH PRESIDENT KATZ: I'm
4 happy to answer questions. If I can't,
5 this guy over here will.

6 THE CHAIRPERSON: Thank you.

7 You're pretty knowledgeable,
8 Madam Borough President.

9 BOROUGH PRESIDENT KATZ: I try.

10 THE CHAIRPERSON: Question for
11 the Borough President?

12 Vice Chairman Knuckles.

13 THE VICE CHAIRMAN: Borough
14 President, thank you for your input this
15 morning.

16 BOROUGH PRESIDENT KATZ: My
17 pleasure.

18 THE VICE CHAIRMAN: Based on
19 your comments, could we infer that your
20 concerns start with ZQA to a greater
21 extent than the mandatory inclusionary?

22 BOROUGH PRESIDENT KATZ: I think
23 that that's probably correct. I think
24 that to couple them together has been an
25 issue for the City and for the

Proceedings

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2 Administration and for the Planning
3 Commission.

4 The parking requirements, the
5 fact that all these neighborhoods were
6 rezoned and now bulk and the envelopes are
7 going to be changed is a real problem.
8 But, remember, we negotiated a lot of
9 affordable housing over the last decade as
10 well, and I did it my committee and we did
11 it with the community.

12 Communities are individual,
13 right? And sometimes one size doesn't fit
14 all. And in the same neighborhood where
15 you may need 20 percent of the units to be
16 30 percent or below an AMI, you may need
17 other means in other neighborhoods or in
18 the same neighborhood of a median AMI as
19 well. And that's really dependant upon
20 the neighborhood needs and the community
21 needs. And so I do have some issues with
22 making it a blanket MIH.

23 You also have to remember that
24 over the last few decades we've rezoned.
25 Affordable housing is not a new concept.

Proceedings

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2 It is new that the entire city is talking
3 about it, and I do allow the
4 Administration for that, I think it's a
5 great accomplishment, but it's not a new
6 process, and it's not a new issue. We had
7 been trying to get affordable housing in
8 so many of the developments throughout the
9 City of New York, and we accomplished it.
10 So to have a citywide discussion is a
11 smart thing and an important thing. I do
12 hope that by the time it get's to the
13 Council, there's an ability to try and
14 gear it more towards communities as well.

15 THE CHAIRPERSON: Ms. De La Uz
16 then Ms. Ortiz.

17 COMMR. DE LA UZ: Again, thank
18 you, Borough President. Thank you for
19 being here. And I'm just wondering -- I
20 just want to pick up, specifically, on the
21 40 neighborhoods that were contextually
22 rezoned, because I think that's obviously
23 a big place where folks are coming from.
24 The communities were highly engaged in
25 that process and I'm sure feel a lot of

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2 ownership around what has come out of that
3 process.

4 So I'm just wondering, and
5 perhaps you're not ready to say just yet,
6 I mean, do you believe it would be
7 reasonable to make any changes in
8 contextual zones in order to accomplish
9 the goals that have been outlined? Which
10 seem -- people seem to agree with the
11 goals of trying to have higher quality
12 affordable housing and make it have -- you
13 know, I think that's a bigger piece, the
14 biggest piece of this.

15 BOROUGH PRESIDENT KATZ: I think
16 the preposition there, though, is that
17 these are better quality, right? And
18 that -- I don't believe that that's a
19 universal thought.

20 So what you're really doing is
21 changing the envelopes, changing the types
22 of buildings that can be on some
23 properties. So you have an R1, R2
24 district, for -- let's just say for
25 example, the entire community, most

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2 likely, have been involved in the
3 discussion of making an R1 and R2, which
4 is single- and two-family homes, and now
5 all of a sudden, there's a possibility
6 that that's not only going to be single-
7 or two-family homes. There's just an
8 issue -- you know, starting on the 5th
9 floor, so that we give space on the bottom
10 of some buildings.

11 The point is that, whether they
12 are good or bad, the communities have been
13 involved with every single neighborhood
14 rezoning, and in this particular case,
15 that's not going to be the case. And I think
16 that is really my philosophical issue
17 here, is that, in a city like New York,
18 the idea of community involvement is what
19 we're based on, right? It's who we are.
20 And so to have a blanket change of all of
21 these zonings that all of our
22 neighborhoods have been involved with is
23 troublesome to me.

24 And the parking, by the way, for
25 Queens just is unacceptable. We are a

Proceedings

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2 borough that relies on our cars, and I
3 have the same fight when I was Chair of
4 the Land Use Committee, which is, that if
5 you stop building building parking spots,
6 that doesn't mean we are going to stop
7 using our cars. It's just not the case.

8 (Applause.)

9 BOROUGH PRESIDENT KATZ: And so
10 it's one of those things where I believe
11 people should use public transportation.
12 I believe that we need to make sure that
13 we have access to good public
14 transportation. But, in Queens, it's a
15 third of our borough that's under
16 subways -- that have subways.

17 Thank you.

18 THE CHAIRPERSON: Ms. Ortiz.

19 (Applause.)

20 THE CHAIRPERSON: Please.

21 Ms. Ortiz.

22 COMMR. ORTIZ: Hi. Good
23 morning --

24 BOROUGH PRESIDENT KATZ: Good
25 morning.

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COMMR. ORTIZ: -- Borough
President, I'm one of your constituents.
I live in Jackson Heights, Queens. So
thank you for your leadership.

BOROUGH PRESIDENT KATZ: Thank
you.

COMMR. ORTIZ: I have a question
about the parking as well. You know, it's
certainLY an issue. I drive around
looking for spots myself. But, you know,
what -- you mentioned the cumulative
effect of waiving parking. I think, you
know, that's probably the case, because
we're also looking at more units instead
of more parking. So 5 percent of a larger
building is going to be -- you know, still
we're going to have more need.

Do you have, you know, as we
look to what kind of amendments you'd
might like to see, any suggestions on how
we might address that particular issue?

BOROUGH PRESIDENT KATZ: I think
that as -- if we want to address the
parking issue, it probably needs to be

Proceedings

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2 done more community by community. But as
3 it stands, to have a building with, let's
4 just say, 70/30, seventy percent market
5 and 30 percent affordable, my
6 understanding of how it stands with this
7 amendment is that 30 percent of those
8 units will not have the requirement of
9 building the parking. And so what happens
10 then is that 70 percent of the units that
11 had the parking requirement, now when
12 they're giving out the parking space,
13 everybody in that building has to go for
14 the exact same lottery for the same spots.

15 So it's not like we're saying
16 some folks can get parking spaces and some
17 folks can't. What we're saying is that
18 we're just going to build less of them.
19 And in the Borough of Queens, where in
20 Jackson Heights, you have public
21 transportation, you don't have that all
22 over the Borough of Queens.

23 And I guess I also disagree with
24 the philosophy, right? Seniors spend
25 their whole life relying on a vehicle and

Proceedings

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2 now they're told that if they need senior
3 housing, most of them will not get a
4 parking spot. And so now they have to
5 rely on Access-A-Ride and all these other
6 services that are just not good enough for
7 our seniors. And so I do think it's part
8 of what we need to do with the
9 communities.

10 COMMR. ORTIZ: Thank you.

11 THE CHAIRPERSON: Any other
12 questions for the borough president?

13 Thank you, Madam Borough
14 President.

15 BOROUGH PRESIDENT KATZ: Thank
16 you very much, ladies and gentlemen. Good
17 luck.

18 (Applause.)

19 THE CHAIRPERSON: Thank you.

20 The next speaker is Council
21 Member Rosie Mendez.

22 MS. MENDEZ: Good morning.

23 THE CHAIRPERSON: Welcome,
24 Council Member.

25 MS. MENDEZ: Thank you,

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Mr. Chair.

First, I want to thank my assembly woman for letting me go ahead. I have to rush back to the City Council. It's a Stated Day and it's also the last day of my colleague, Maria Del Carmen Arroyo. And thank you, members of the Commission.

I want to say that a lot's been said in the media about community boards and the fact that they are advisory. They are part of the ULURP process. And while they are advisory, they know our communities. They serve on these boards as volunteer, and they everyday balance the issues of affordable housing with light and air and what is best for our districts and keeping the character of our communities. And so I pay particular attention to what my community boards have to say, and I hope you do too.

So I may not have time for questions. You can defer that to my community boards or my assembly woman, who

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2 is more than apt, And I will read some of
3 my testimony.

4 So I applaud the goals of the
5 administration in attempting to create and
6 preserve affordable housing for New
7 Yorkers. While I look forward to seeing
8 New Yorkers provided with the opportunity
9 to remain in the City, I do have concerns
10 about the Administration's proposal that I
11 would like to make you aware of. I, as
12 always, look forward to working with HPD,
13 and the Department of City Planning as
14 these proposals move forward.

15 In the early stages of the
16 proposal, it was clear that ZQA would
17 negatively impact a large portion of my
18 district. Only a few years ago we passed
19 the Lower East Side/East Village zoning
20 that created growth areas and put in place
21 protections that would prevent
22 out-of-scale context development. Those
23 protections were threatened by ZQA as
24 written then by upzoning the R72, the R7A,
25 and the R8B areas. And there were

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2 specific reasons we put those protections
3 in place.

4 Since then, we have been able to
5 successfully prevent the architectural
6 context of the community from changing
7 drastically and protecting a
8 human-scale-built environment. ZQA might
9 very well have threatened the low-rise
10 character of the East Village, but
11 modifications made early on to ZQA have
12 removed that threat, and I'm thankful for
13 those changes.

14 Housing for senior citizens is
15 desperately needed in my district and
16 throughout the City. However, any units
17 created must be permanently affordable.
18 Many seniors live on fixed incomes, which
19 makes it difficult to make ends meet.
20 Should this Proposal move forward to
21 adoption, it must assure that any new
22 units created through this text amendment
23 will be permanently affordable. We cannot
24 provide permanent building height
25 increases for buildings that will provide

Proceedings

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2 affordable housing for a designated number
3 of years.

4 There are other aspects of this
5 proposal that concern me and pose
6 potential dangers to my district and,
7 indeed, to the rest of the City. As
8 mentioned in the Manhattan Borough Board
9 Resolution regarding the proposal, the
10 text will eliminate protections put in
11 place by the Sliver Law. During the past
12 ten years that I served as council woman
13 for District 2, I and others have
14 successfully used the Sliver Law to stop
15 illegal rooftop additions and additional
16 stories that would have created
17 pencil-shaped buildings. These proposed
18 pencil-shaped buildings would have been
19 out-of-scale eyesores in our low-rise
20 community and would have been out of
21 character with existing walk-up tenement
22 buildings that comprise a large section of
23 the Lower East Side, and East Village.
24 Therefore, I wholeheartedly agree with the
25 Manhattan Borough President Gale Brewer,

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2 when she states that you cannot eliminate
3 rules and conflict unless there are
4 tighter controls in place.

5 Another concern I have as
6 regarding these proposals were raised by
7 the Community Boards that overlap with my
8 district. The Second Council District
9 contains Community Boards 2, 3, 5, and 6.
10 These boards, indeed all of Manhattan's
11 community boards, have vote today
12 recommend denial of the Administration's
13 proposal with conditions. The
14 Administration's ability to address and
15 resolve concerns raised by -- these
16 denials were conditioned on the
17 Administration's ability to address and
18 resolve concerns raised by the respective
19 boards. While the concerns vary from
20 board to board, I urge the Administration
21 to take a moment to consider that perhaps
22 ZQA must depart from the one-size-fits-all
23 approach and to work with each and every
24 community board to tailor this proposal to
25 the needs of our different communities and

Proceedings

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2 their different building topologies.

3 Below, I raise some important issues
4 raised by my board that bears repeating:

5 Community Board 2 fears that ZQA
6 may spur development and result in new,
7 out-of-context development. We are
8 beginning to see such a trend now.

9 Community Board 3 states that if
10 these proposals are to spur development of
11 affordable units, the mandates for
12 percentages of AMI in MIH should somehow
13 be incorporated into ZQA. In addition, I
14 urged the Commission to modify ZQA so that
15 all units created through the unused FAR
16 be for permanently affordable units.

17 Community Board 5 and I urged
18 the Commission to modify modifications
19 that would protect the architectural
20 character of buildings and historical
21 districts.

22 And Community Board 6 and I
23 urged that any zoning lot mergers include
24 a height limit.

25 My final concern is that these

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2 sites -- is that sites that will not take
3 advantage of any available air rights;
4 they might sell those rights rather than
5 build to the full potential building
6 envelope and create new units. Property
7 owner preference for profits right away
8 versus potential profits down the road
9 will not result in new, needed residential
10 units for senior citizens.

11 The City's needs for apartments,
12 affordable to extremely low, lower and
13 moderate income family is greater than
14 ever before, with the pace of luxury
15 development grossly out-pacing the
16 development of affordable units in the
17 City. I support the Mayor's goal of
18 mandating the creation of affordable
19 housing in rezoned areas of the City.
20 While I will prefer to mandate affordable
21 housing in all residential development, I
22 understand that in all cases that might
23 not be economically feasible and that the
24 City might run afoul, of the Takings Clause
25 of the U.S. Constitution.

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2 As the sole council member who
3 did not abstain but voted with the borough
4 president and my community boards yes, to
5 disapprove with conditions, I want to
6 reiterate some of the concerns in that
7 board resolution. I would strongly urge
8 the Commission to include anti-harassment
9 and anti-eviction certifications to the
10 proposals, as was instituted in the
11 Clinton Hells Kitchen Special District.
12 These protections have proved successful,
13 and perhaps with minor changes can help to
14 protect New Yorkers in other communities
15 and allow them to remain in the
16 communities they helped to make great.

17 The BSA special permit should be
18 eliminated completely and/or have -- be
19 more fine-tuned. There is no financial
20 hardship involved here and any
21 procedural -- any procedure created to
22 allow developers to wiggle out of their
23 civic duty to this city will be used to
24 deprive us of the housing we desperately
25 need.

Proceedings

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2 I urge consideration of
3 eliminating the off-site provision. If
4 public subsidies are used to make projects
5 financial feasible, then they must also
6 include housing options and opportunities
7 for people living in the community in
8 which they build.

9 I want to point out that prior
10 to the 2006 420 -- 421-a amendment, what
11 we got in my district was all luxury
12 units, and all the affordable housing was
13 built elsewhere. Income qualifications
14 should be tied to the AMI of the least
15 economically stable communities in which
16 the development happens.

17 I'm going to end it here,
18 because I know my colleagues are waiting
19 and the public is waiting. I want to
20 thank you for the opportunity, for giving
21 me this time to testify in front of
22 everyone in the front of the Commission.
23 Thank you very much, Commissioners. Thank
24 you, Mr. Chair. Thank you, the public and
25 my community boards.

1 Proceedings

2 THE CHAIRPERSON: Thank you,
3 Ms. --

4 (Applause.)

5 THE CHAIRPERSON: Thank you,
6 Council Member.

7 Next speaker is Assemblywoman
8 Deborah Glick.

9 MS. GLICK: Good morning. It's
10 good to see you.

11 In the future, I'd be happy to
12 help you find a larger space so the people
13 around the corner and around the block
14 would have an opportunity to be here.

15 (Applause.)

16 THE CHAIRPERSON: Thank you.

17 MS. GLICK: But I do appreciate
18 very much this opportunity to present this
19 testimony to you today.

20 THE CHAIRPERSON: And thank you
21 for your patience. I know you've been
22 here for a while.

23 MS. GLICK: There's a lot of
24 people here who are going to be here a lot
25 longer than me. So it's a...

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(Laughter.)

MS. GLICK: I'm very to have an opportunity to testify on the citywide zoning text amendment, ZQA and MIH. These two proposals stand to create citywide sweeping changes that ignore the unique qualities found in individual communities. These proposals are a one-size-fits-all approach that would invalidate hard won battles to protect historic neighborhoods and contextual districts. While the overall goal of creating more affordable housing and senior affordable housing is laudable, the broad stroke of these amendments attempt to achieve these goals at the expense of existing communities.

I do not support either ZQA or MIH zoning texts in their current form. I would urge you reject these proposals until changes outlined below and by individual community boards are addressed. Those are volunteer citizens who spend time reviewing things, and while they may be legally advisory, I think the City

Proceedings

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2 Administration would be well to, you know,
3 listen to their advice.

4 According to the presentations
5 and the written materials, it seems that
6 the main goal of ZQA is to facilitate the
7 development of more visually appealing
8 buildings and create a uniform
9 streetscape, while allowing developers to
10 maximize their available FAR, Floor Area
11 Ratio. The proposal as it stands fails to
12 protect existing specific neighborhood
13 regulations that limit intrusive heights
14 and bulk. These proposed changes affect
15 neighborhoods, regardless of whether they
16 are historic districts, and further
17 increase heights across the board. While
18 this would not change existing landmark
19 preservation law, it's known that the
20 commission has long indicated that it
21 cannot evaluate a project based on height.
22 As such, the increased height limits would
23 directly impact any historic district and
24 slowly erode the character of these and
25 future districts. It not only undermines

Proceedings

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2 the unique nature of the areas but it
3 erodes these neighborhoods as attractions
4 for our film and tourist sectors.

5 While the population of the City
6 continues to grow, density will increase,
7 but it should not be to the detriment of
8 neighborhoods that have worked hard and
9 long to protect the historic character of
10 their neighborhoods. Furthermore, the
11 increased density that would result from
12 ZQA puts further strain on public
13 resources that are not addressed directly
14 in this plan, such as, school seats, open
15 space, and transportation needs. By
16 definition, the text amendment would
17 increase residential development and
18 density throughout the City. To encourage
19 the increase without updating the City
20 environmental quality review formula is
21 absolutely negligent. Though the public
22 infrastructure is already stressed, most
23 communities cannot withstand increased
24 density without significant reenforcement
25 of public facilities.

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2 We've already had a crisis in
3 overcrowding schools. This will only add
4 to it if we do not address the formula
5 used to determine how many school seats
6 are needed.

7 Another provision of ZQA would
8 increase the height limits for new
9 residential development by 25 feet, where
10 developers opt into 80/20 voluntary
11 inclusionary housing. The argument for
12 this height increase, is that the
13 buildings are not able to use all
14 available FAR in contextual districts,
15 inclusionary zones, and therefore, develop
16 a building which is primarily or
17 exclusively luxury housing, and that the
18 full FAR is not utilized that the
19 currently zoning allows. It's absolutely
20 untrue, especially in neighborhoods like
21 the Village where long-fought battles to
22 limit height and bulk in order to preserve
23 historic neighborhoods have occurred.

24 Developers have been maxing out
25 FAR by any means possible by building

Proceedings

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2 large luxury developments without
3 including any affordable housing, and
4 regardless of the changes in ZQA, the
5 original problems in the voluntary
6 inclusionary housing program will persist
7 and until those issues are addressed,
8 buildings will continue to grow taller
9 with scant affordable housing to justify
10 them.

11 Additionally, ZQA would
12 eliminate the Sliver Law, which protects
13 mid-block and non-contextual zones from
14 out-of-scale developments. Despite what
15 other changes ZQA would make, such as
16 protections to the building envelope
17 requirements and minimal first-floor
18 heights and setbacks and building
19 articulation and setting a maximum number
20 of allowable floors, which is actually a
21 good thing, the potential for developers
22 to use voluntary inclusionary housing with
23 ZQA in order to construct larger buildings
24 without regard to the streetscape will
25 still persist. The Sliver Law provides

Proceedings

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2 protections to blocks and should not be
3 eliminated but, rather, we need stronger
4 protections.

5 Zoning districts were created to
6 ensure the adequate light and air are
7 provided in neighborhoods for residents,
8 allowing for neighborhoods to be liveable.
9 Developers rarely need encouragement to
10 build taller, and changing the zoning to
11 make it easier seems unnecessary, unwise,
12 and clearly runs counter to the public
13 will, evidenced by the rejection by
14 borough boards.

15 In the case of incentivizing the
16 creation of senior affordable housing in
17 ZQA, which is desperately needed, only
18 20 percent of the allocated FAR can be
19 devoted to senior housing in R6 through
20 R10 districts with substantial height
21 increases; however, the senior housing is
22 not permanent and will become market rate
23 once the financial obligation used to
24 create the senior housing expires. This
25 results in permanently taller and bulkier

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2 building, but only temporary housing for
3 seniors. It's not only bad for the
4 individual seniors who might be priced out
5 of one-time affordable units, but it is a
6 bad policy to so significantly subsidize
7 needed housing for such a short-term gain.

8 ZQA would also reduce the legal
9 minimum size for apartments from 400
10 square feet to 300 hundred square feet.
11 Legalizing microunits will encourage
12 developers to build smaller spaces while
13 still collecting astronomical rents. Just
14 this month, the 250-square-foot apartments
15 touted by the previous administration came
16 on the market for \$2,650 to \$3,150 -- 250
17 square feet. Furthermore, small spaces
18 like this are bordering on tenement
19 standards of liveability. In fact, the
20 minimums were put in place to prevent that
21 kind of condition from developing.

22 Despite small interiors and
23 close quarters, it will be difficult to
24 ensure that only one individual occupies
25 the space, and frequently, there will be

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2 landlords or tenants using the short-term
3 rental outlets, like Airbnb, to use these
4 spaces as if it were a hostel, hosting
5 multiple individuals in a space that far
6 exceeds the legal occupancy. It further
7 jeopardizes our housing stock as units are
8 lost to transient youth.

9 Furthermore, older New Yorkers
10 who just might face the need for home care
11 or might need rehabilitation will be
12 forced out of their home, because in that
13 size space, a wheelchair may not even
14 be -- the space may not be available for a
15 wheelchair.

16 Existing tenants who occupy
17 buildings are in jeopardy as well as
18 vulnerable populations in
19 micro-developments; my office receives
20 calls from residents all the time about
21 the quality of life issues that are
22 exacerbated by increased density.

23 If the goal is to encourage
24 construction of new residential units, we
25 must acknowledge that some adverse impacts

Proceedings

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2 that typically encourage -- that accompany
3 new construction, and therefore, efforts
4 must be made to fight displacement and
5 secure very strong anti-harassment
6 protections for existing and future rent
7 regulated tenants.

8 Finally, an over-arching
9 critique by the community boards in
10 Manhattan and our Borough President, Gale
11 Brewer, is that uniformity of ZQA is
12 inappropriate for unique neighborhoods.
13 The Village, Soho, and Tribeca have very
14 different needs between themselves, let
15 alone between Inwood and the Upper East
16 Side.

17 Neighborhoods that face new
18 development, that seek to build higher
19 despite the historical value of an entire
20 block would cause more neighborhoods to
21 face displacement. Overall changes to ZQA
22 would largely hurt neighborhoods and
23 existing protections in an expensive,
24 sought after real estate market.

25 Mandatory inclusionary housing,

Proceedings

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2 while there is a serious affordable
3 housing crisis that we all recognize, and
4 I applaud the goals of MIH in which all
5 new construction would be required to
6 include affordable housing, allowing for
7 income diversity is crucial. And the
8 incomes vary drastically, so the long-term
9 residents are often priced out due to a
10 volatile real estate market, but in an
11 attempt to address the issue in one
12 citywide amendment, the MIH limits its
13 affordability requirements to
14 significantly low and middle income
15 individuals, and families could still be
16 priced out of certain neighborhoods based
17 on the geographic boundaries and the MI --
18 AMI requirements. Specifically, not
19 including midrange AMI in Manhattan, south
20 of West 110th and East 96th Street does
21 not address the affordability or create
22 long-term sustainable affordable housings.
23 In lower Manhattan, where incomes are
24 already substantially higher than the
25 citywide median average, the proposed AMI

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2 bands do not reflect what is actually
3 affordable, just look in the newspaper,
4 causing future developments and using MIH
5 incentives to offer rents that are more in
6 line with market-rate rents.

7 Individual communities and
8 neighborhoods should be able to decide the
9 appropriate AMI bands that most make sense
10 for their neighborhoods. In addition,
11 harassment and problems already exist for
12 tenants throughout the City.

13 If MIH is enacted without
14 appropriate harassment protections to
15 support tenants in their existing homes,
16 residents are at risk of even greater
17 illegal intrusions by their landlords.
18 Enforcement by the City is frequently
19 'lacking and must be increased. The
20 Dominoes Sugar factory was an example
21 where under voluntary inclusionary housing
22 it received a tax break, and it still
23 managed to overcharge tenants for what
24 was, apparently, a period of many, many
25 years.

Proceedings

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2 So if this problem of
3 enforcement and policing in this vast
4 system of tax breaks occurs under the
5 voluntary program, it's very concerning
6 that it may be even more rampant if MIA is
7 approved without protections.

8 Finally, the MIH offers a
9 payment-in-lieu option and housing fund,
10 appropriately, the acronym is PIL, through
11 which developers can make a contribution
12 to a housing fund that can be used to fund
13 affordable elsewhere. If the proposed
14 development is smaller than 12,500 square
15 feet, the MIH should lower that minimum
16 threshold to be more in line with the
17 actual neighborhood square footage. And
18 if PIL funds are generated in one
19 community for affordable housing, it
20 should be required to be used within that
21 community, rather than going to another
22 part of the City or possibly being used
23 for some other purpose altogether at some
24 point.

25 Additionally, I have concerns

Proceedings

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2 that the poor -- that the MIH, as written,
3 allows for the creation of a poor
4 building, which would replace the poor
5 door that has long been offensive. This
6 provision needs to be reviewed and full
7 integration of all levels of income need
8 to be guaranteed within developments
9 without any loopholes. The Board of
10 Standards and Appeals can grant developers
11 exceptions under the guise of hardship or
12 unique conditions, and those are not well
13 defined under this plan. So they need to
14 be clarified and strengthened in order to
15 ensure that community protections will not
16 be undermined further by MIH. And it is
17 my hope that much will be altered; it
18 would be appropriate. The way that this
19 city has grown and has been successful and
20 has attracted more and more people is
21 through mixed-income, mixed-use
22 neighborhoods. My fear is that under the
23 guise of creating some affordable housing,
24 we will actually increase the segregation
25 that currently exists in this city.

1 Proceedings

2 (Applause.)

3 THE CHAIRPERSON: Thank you.

4 Questions for Assembly Member

5 Glick?

6 Thank you very much.

7 MS. GLICK: Thank you.

8 THE CHAIRPERSON: Okay. The
9 next speaker is Maritza Silva-Farrell.10 MS. SILVA-FARRELL: Good
11 morning. Thank you to the City Planning
12 Commission for giving me the opportunity
13 to comment on the proposed MIH plan,
14 specifically. My name is Maritza
15 Silva-Farrell, and I am a Director of the
16 Real Affordability for All Coalition. We
17 are a community and faith and labor
18 organization that is very concerned around
19 the deep affordability of building that
20 we're building in our city as well as what
21 kind of jobs we are creating as we are
22 rezoning our city.23 We do share the goal with the
24 Mayor of creating and preserving
25 affordable housing throughout New York

Proceedings

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2 City and using upzoning to do so.

3 Unfortunately, the Mayor's plan will leave
4 behind many of the same lower income and
5 moderate income New Yorkers whose housing
6 and jobs needs were ignored by the
7 previous Administration. The Mayor's plan
8 includes no standards or criteria for job
9 quality and it doesn't achieve the real
10 affordability levels that many low-income
11 and moderate-income New Yorkers need to
12 continue to live in the neighborhoods
13 where they currently reside. Good union
14 construction jobs and affordable housing
15 are two sides of the same coin.

16 (Applause.)

17 The CHAIRPERSON: Wait. Please
18 hold your applause. You're just cutting
19 into her time.

20 MS. SILVA-FARRELL: That's why
21 we need a better plan that gets as deeper
22 levels of affordability while creating
23 good jobs for local residents impacted by
24 the rezonings. Increasing the density of
25 neighborhoods is a primary tool that the

Proceedings

1
2 City has to use to get deeper
3 affordability, and good jobs. Density is
4 a big bargaining chip we can use with
5 developers. We shouldn't give away for --
6 we shouldn't give this away for free.

7 Every community should be able
8 to require developers to meet high
9 standards for real affordability and job
10 quality in exchange for greater density.
11 That's a fair and reasonable deal.

12 Our plan, known as a Real
13 Affordable Communities Plan, requires that
14 only those developers that agree to meet
15 our standards for real affordability and
16 career-oriented jobs will be able to
17 receive a density bonus. This bonus would
18 not create increased density in a
19 neighborhood but would allow a developer
20 to access the full zoning potential
21 proposed in the upzoning.

22 Under our plan, 50 percent of
23 the new apartments created through the
24 rezoning will be affordable at or below
25 the median income of our neighborhood,

Proceedings

1
2 defined by community boards or zip codes,
3 whichever is more accurate. Because
4 density bonus programs are voluntary, they
5 are not subject to the many of the same
6 restrictions as typically land-use
7 programs. This makes it possible for the
8 City to use such a program to establish
9 the standards for local hiring and career
10 track jobs.

11 We are saying vote no to this
12 plan unless our proposal that will allow
13 more -- in cooperation from what the
14 community is saying today is incorporated.
15 We -- it's very simple: Either build it
16 right or don't build it all. We can't
17 continue to give into the wealthy real
18 estate interests in a City who only cares
19 about their bottom line. We must use our
20 zoning power to prevent gentrification and
21 to create good jobs for local residents.
22 The Mayor's plan fails on all those
23 counts.

24 Thank you very much.

25 (Applause.)

Proceedings

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THE CHAIRPERSON: Thank you.

Questions? Questions for
Ms. Silva-Farrell?

Thank you very much.

MS. SILVA-FARRELL: Thank you.

THE CHAIRMAN: Oh, a question.
I'm sorry. Excuse me.

Ms. Ortiz.

COMMR. ORTIZ: Hi. Good
morning. Thank you for your testimony.

I have a question, because the
issue of deeper affordability has gone up
quite a bit and, you know, as we've gone
through the zoning text, my understanding
is that MIH provides just a base, a floor
of affordability but that additional
subsidy could be provided and would be
provided in many of these communities in
the same way we do now through the, you
know, negotiation of community boards and
such to deepen the affordability.

Do you see that as an
opportunity here? I mean, because right
now what we have is a lot of, you know,

Proceedings

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2 neighborhoods in change, buildings being
3 built without any affordability, and I
4 think that's the challenge.

5 MS. SILVA-FARRELL: Well, I do
6 think that we're giving tax payer's money
7 to developers. As we know there's
8 \$1 billion given for this kind of
9 rezonings to happen. It's really
10 important to have requirements connected
11 to it, right? So when we talk about
12 affordability, it's really important that
13 we are going to be serving people who are
14 going to be needing the housing. So we
15 just recently passed the 5 for 15
16 campaign, right? So fast food workers
17 will be able to access for \$15 an hour,
18 which that means is \$25,000 a year.

19 The current plan does not cover
20 those folks, right? So if we are going to
21 be giving subsidies, then we need to make
22 sure that the folks -- when we talk about
23 affordable housing, we talk about
24 affordable housing that we will be serving
25 those communities.

Proceedings

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People who are making less than \$25,000 a year, folks who are making less than \$30,000 a year, our plan, the proposed plan today, Real Affordability for All Coalition is actually calling for at least 20 percent of the units to be included at 30 percent of the AMI and below, which is really important to take into consideration. The plan as it stands right now doesn't have that.

COMMR. ORTIZ: The question is that, you know, or our understanding of the MIH is that additional subsidies could potentially get to that lower AMI, which is what we'd very much like, and I wasn't sure if that was part of the consideration in your position.

MS. SILVA-FARRELL: Well -- I mean, if we're gonna be giving -- again, if we're giving money to developers, it's great they're going to build some levels of affordability, let's just make sure that affordability is there, right? As it stands, the plan doesn't show, number one.

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Number two, you know, developers do want to make money. If we can actually provide that, if they're given the floor, if we can provide a higher density, neighborhoods that are appropriate for density, then just do that and that's how we can create more affordable housing, because the crisis is clear, right? Like, we know that we live in an affordable crisis -- a housing crisis now, and we just have to step up. We cannot just continuing doing the same old, same old.

COMMR. ORTIZ: Thank you.

MS. SILVA-FARRELL: Thank you.

THE CHAIRPERSON: Okay. Any other additional questions?

Thank you very much.

Next speaker is John Medina.

(Applause.)

THE CHAIRPERSON: Please. John Medina?

MR. MEDINA: Good morning Commissioners, thank you for your time. All the union brothers and sisters here,

Proceedings

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2 LIMA, RAFA, Community Voices Heard, I'm a
3 board member. The affordability crisis in
4 New York City is a real one. Let's not
5 play games with this. Lower-income and
6 moderate-income New Yorkers are being
7 priced out of their neighborhoods.

8 Incomes are not increasing in most
9 neighborhoods but the rents keep going
10 high. This gap between stagnant incomes
11 and higher rents is making housing more
12 and more unaffordable, especially as
13 developers focus on building new
14 apartments for the wealthy.

15 To tackle this growing
16 affordability crisis, Mayor de Blasio's
17 rezoning of neighborhoods, although a good
18 attempt at trying to deal with the 200,000
19 units lost in New York City and growing
20 must create real affordable communities
21 for lower-income and moderate-income New
22 Yorkers.

23 We live here. We're born here.
24 We built this city. We have a right to
25 retire in this damn city.

Proceedings

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(Applause.)

MR. MEDINA: Real affordability means housing must match the incomes of the vast majority of the people living in the neighborhoods, not districts and counties that have nothing to do with the five boroughs, like Westchester and other counties in New York State. This new housing must be built for the hundreds of thousands of New Yorkers who were left behind under the Bloomberg's development agenda. Creating real economic opportunity and real affordable housing in our communities can help limit gentrification and ensure that new development happens without displacement. We are coming together to demand that de Blasio's rezoning prioritizes us, not wealthier clients or outside investors. Build it right. I am sick and tired of seeing construction sites using non-union workers.

(Applause.)

MR. MEDINA: Accidents, deaths,

Proceedings

1
2 it's a liability.

3 (Applause.)

4 THE CHAIRPERSON: Please.

5 MR. MEDINA: We need unions to
6 build it right. Let's go by the building
7 codes. Let's enforce these laws that we
8 already have on the books. We don't have
9 to create the wheel all over again.

10 Rezone for new residential
11 construction. If developers want to build
12 it taller, denser apartment buildings to
13 earn bigger profits, density is a big
14 bargaining chip. Make no mistake about
15 it. You have that power. Make density a
16 bargaining chip. Use developers. Don't
17 give it away for free. They get tax
18 credits, make them earn it.

19 Every community should be able
20 to require developers to meet high
21 standards for real affordability, job
22 quality for grants of density, fair and
23 reasonable deals. Stop making these back
24 door deals, okay? Our real affordable
25 communities' plan will help us achieve

Proceedings

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2 much better deals with developers with
3 more real affordable good paying career
4 jobs for the people who are in the
5 communities. Get these jobs. Give them
6 to the union guys. Let these guys work,
7 so they can afford to live where they
8 build the damn houses.

9 Last, but not least, I really
10 applaud your efforts. I -- you got a lot
11 of more work to do, so don't think you're
12 going on vacation, because we going to be
13 here right with you, okay? This is not,
14 like Ruben Diaz said, it's being rushed to
15 fast, because you asking all these
16 people -- help me help you, okay? We in
17 here for the next 50 years. Let's not
18 rush this thing.

19 Let's go through the process,
20 fix what's wrong. Make it right for every
21 New Yorker to -- housing is a right in
22 this city. I don't know what happened to
23 America, but housing's a right in this
24 city. Let's be a beacon of New York
25 immigrants and for everybody that lives

Proceedings

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here once again.

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Thank you.

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(Applause.)

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THE CHAIRPERSON: Thank you.

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(Applause.)

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THE CHAIRPERSON: Please.

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The next --

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(Applause.)

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THE CHAIRPERSON: Please.

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The next speaker -- the next

12

speaker is -- is Pearl Barkley.

13

MS. BARKLEY: Good morning,

14

everyone. Thank you for giving us New

15

Yorkers the opportunity to speak.

16

Oh boy. You know, it's a lot

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that I could say as far as facts and

18

figures go, but I think that it's time for

19

us to really think about what is it we're

20

talking about?

21

I'm very disturbed, number one,

22

that I haven't heard one mention about

23

homelessness. Not one.

24

(Applause.)

25

MS. BARKLEY: I mean, what are

Proceedings

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2 we doing here? Either we -- people have a
3 right to a home or they don't. It's that
4 simple. You could go on with AMIs,
5 30 percent, 20 percent, 10 percent,
6 90 percent, 80 Percent, but at the end of
7 the day, what is this saying about us as
8 people, as human beings who say that we
9 are civilized? I think that's what we
10 have to ask ourselves, are we civilized or
11 are we not, because I personally, over the
12 past, I would say, 15 years have had to
13 assist people who were homeless by letting
14 them come in my home to take a break from
15 the shelter, to take a break from not able
16 to find a house, and I'm getting tired of
17 that.

18 There should be -- a lot of
19 these people are working people, you know;
20 maybe some of them work, maybe some of
21 them don't. They might be in between a
22 job. But I should not have to do that. I
23 should not have to do that. Either you
24 that people deserve a home or they don't.
25 It's just that simple. You can go on and

Proceedings

1
2 on with discussions of money, no money,
3 whatever, and that's basically all I have
4 to say.

5 I think we have to look, at this
6 time of year, which is supposed to be a
7 time of renewal, Christmas spirit,
8 whatever, what are we saying about
9 ourselves as human beings if we can't come
10 up with a way to provide housing for
11 everybody that needs it regardless to what
12 they earn or don't earn?

13 I think it's a shame that
14 housing is now in a lottery form. Now
15 you're telling me parking lots, there's a
16 lottery? I mean, what is this? And we
17 say that we're civilized people. So
18 that's all I would just like people to
19 focus on. That's all.

20 (Applause.)

21 THE CHAIRPERSON: Thank you
22 Ms. Barkley.

23 Questions?

24 The next speaker is Carl
25 Johnson.

Proceedings

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(Applause.)

THE CHAIRPERSON: Please.

Please. Give your speakers an opportunity to be heard.

Mr. Johnson.

Mr. JOHNSON: Good morning, Commissioners. It is still morning, I hope.

My name is Carl Johnson. I am the organizer for Plumbers Local Union Number 1 here in New York, the plumbers of New York City. I stand before you today to speak on behalf of the Building and Construction Trades Council of New York City.

This morning, we stand here working together with our allies in the RAFA coalition. The mass plan does not include standards or criteria for job quality, and it doesn't achieve the real affordability levels that many low- and moderate-income New Yorkers need to continue to live in these neighborhoods that we call our city, where they

Proceedings

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2 currently reside. We here at the Building
3 Trades feel it's critically important to
4 support a plan that will address the
5 issues of affordability with the creation
6 of good union jobs that lead to rewarding
7 union careers.

8 Thank you, ladies and gentlemen.

9 (Applause.)

10 THE CHAIRPERSON: Thank you
11 Mr. Johnson.

12 Questions for Mr. Johnson? No.

13 Thank you Mr. Johnson.

14 Next speaker is Carl Turner. Am
15 I pronouncing that correctly?

16 MR. JOHNSON: Good morning.

17 THE CHAIRPERSON: I'm sorry.
18 Good morning.

19 MR. JOHNSON: Distinguished
20 guests, fellow co-workers, good morning.

21 THE AUDIENCE: Good morning.

22 MR. JOHNSON: I'm here today
23 just to express myself. I want to ask
24 this question to everybody: Is this a
25 sell-out for all hard working New Yorkers,

Proceedings

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2 constructions workers, hotel workers or
3 what?

4 It's been long enough that
5 elected officials of this great state and
6 city, behind our backs, selling out us
7 hard working workers to greedy developers
8 and greedy general contractors.

9 What I would like to say,
10 briefly, is that let's get this affordable
11 thing in order. Let's get it the right
12 way. Let's use the right workers, workers
13 with skills and the proper training, not
14 just workers who walk off the street, go
15 on a jobsite, ask for a day's work and get
16 it, and don't align somebody, neither the
17 police or somebody of that worker crew,
18 has to go or make a phone call to his
19 family, he won't be coming home back for
20 no more because he got killed on that
21 jobsite. You know the reason? Because he
22 did not got the proper training. He did
23 not get that skill training that he need,
24 as a union worker would do. I have seen
25 many accidents. I have a co-worker friend

Proceedings

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2 that died on non-union jobsite because of
3 what? The foreman or the owner of that
4 construction company rushing us, get this
5 job done, for the bottom line, the green
6 paper, which is the dollar.

7 So we all need to send a message
8 to the Mayor, to the elected official, and
9 to some of them, stop selling us out.
10 Stop being greedy. Stop taking the back
11 door with our lives.

12 (Applause.)

13 THE CHAIRMAN: Please.

14 MR. JOHNSON: Does our lives
15 worth a million dollars? Does our
16 lives -- does hard working New Yorkers,
17 immigrants or whatever you may call us,
18 does our lives worth a million dollars?
19 Does our lives worth a back door deal? I
20 don't think so.

21 So give the jobs, all the
22 affordable housing you are talking about,
23 give it to the skilled, trained, proper
24 working people. Let us get this
25 apprenticeship in order.

Proceedings

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2 Don't tell me about above ten
3 story and how you going to use trained
4 people. Workers died on the first floor.
5 Workers died on the second floor. Let's
6 get trained people, trained the proper
7 way, to get this job done, and get it done
8 right way.

9 And affordable for who? \$1,600
10 for a basement apartment for a one-room
11 while some of us is just taking home 3-400
12 dollars a week. \$1,600, that for the
13 month, that's only for the rent. So what
14 are we going to eat? How we going to send
15 our kids to school?

16 Let's get it real and let's get
17 this thing in order. Please, I'm asking
18 you, vote no, and it's just no.

19 Thank you very much.

20 (Applause.)

21 THE CHAIRPERSON: Thank you.

22 Thank you.

23 (Applause.)

24 THE CHAIRPERSON: Please.

25 (Applause.)

Proceedings

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THE CHAIRPERSON: Please.

Okay, we are now going back to those in favor. The next five speakers are Rafael Cestero, Jeffrey Lubell, Dawanna Williams, Elizabeth Strojan, and Alexa Sewell, and numbers 11 through 15. And then we will go back to those in opposition.

Mr. Cestero.

MR. JOHNSON: Good morning.

Good morning to the members of the Commission. Thank you, Chairman Weisbrod, and all the distinguished members of the Commission.

My name is Rafael Cestero and I am the President and CEO of the Community Preservation Corporation.

THE CHAIRPERSON: Why don't we wait one second since number of people seem to be leaving.

In fact, Mr. Cestero, why don't we take a one minute...

MR. CESTERO: One-minute break?

THE CHAIRPERSON: One-minute

Proceedings

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recess.

(Whereupon, Jennifer Cassella replaces Garry J. Torres as the hearing reporter.)

THE CHAIRPERSON: Ladies and gentlemen, we're going to get started again please. Please, everyone, take your seat. We had a very short but important break.

The next speaker is the distinguished Borough President from Manhattan, whose timing could not have been more perfect, Gale Brewer, and so Madame Borough President, whenever you're ready, we're ready for you.

THE VICE CHAIRMAN: Thank you very much.

Good morning, almost afternoon, Chair Weisbrod and Commissioners. I am Gale Brewer, Manhattan Borough President, and I'm here to speak on the two citywide text amendments, as you know only too well, ZQA and MIH; they are apart of our DNA at this point.

Proceedings

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2 As you know, I issued a
3 conditional no on ZQA and a conditional
4 yes on MIH. I will first share my
5 concerns about ZQA and then address the
6 work that -- needs to be done on MIH for
7 my office to give full, full support
8 Zoning for Quality and Affordability was
9 discussed at three Manhattan Borough board
10 meetings and I know the borough-wide
11 public hearing on November 16th. We also
12 ran informational sessions for community
13 board chairs, Land Use and Housing
14 Committee chairs, affordable housing
15 groups and landmark organizations. And I
16 want to say to your staff and HPD staff
17 were at every one, and I very much
18 appreciate that.

19 We worked hard to ensure that we
20 heard the ideas and concerns of as many
21 residents, experts and organizations as
22 possible. At every step of the public
23 review process, as I said, City Planning
24 responded to concerns and made tweaks to
25 the ZQA text proposal, and I believe a

Proceedings

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2 number of additional changes could also be
3 made to address many of the issues raised
4 during our lengthy outreach process.

5 Still, however, concern remains
6 over the interplay between ZQA provisions
7 and restrictions in recently enacted
8 contextual districts. This concern may
9 play out differently in each community
10 board and is not so easily overcome, as I
11 think you know.

12 Several other changes should be
13 made:

14 One, the text could be revised
15 pretty easily to maintain the separation
16 between wide and narrow streets so that
17 the resulting height of new construction
18 are proportional to the width of the
19 streets.

20 Two, the provision allowing
21 residential use to encroach upon the
22 historic donut of our rowhouse blocks
23 should be removed.

24 Three, the additional provision
25 to the Sliver Law, I think that was

Proceedings

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2 originally Sally Goodgold's Sliver Law,
3 whick weakens --

4 THE CHAIRPERSON: Even I
5 remember that, Madame Borough President.

6 BOROUGH PRESIDENT BREWER: Yes,
7 I know. Just you and me in the room.

8 -- which weakens it by removing
9 its applicability to the construction of
10 certain residential and community
11 facilities should be eliminated. We want
12 to keep the Sliver Law is what I'm saying,
13 otherwise Sally Goodgold would get upset
14 with us from above.

15 Four, I think, provision should
16 be added to strengthen and clarify the
17 language around the permanency of
18 affordable senior housing, ensuring that
19 permanent building size increases are
20 accompanied by permanent use or
21 affordability requirements. And I know
22 that one could say that a balloon mortgage
23 would handle that but I'm not sure.

24 And finally, the CPC report can
25 make clear that these changes will not

Proceedings

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2 unduly burden the Landmarks Preservation
3 Commission. In addition to alleviate
4 another non-land use concern, the report
5 should make clear that these changes do
6 not elevate one construction method over
7 another but, rather, seek to put all on
8 equal footing.

9 As you know, I have communicated
10 all of this with our amazing Land Use
11 staff and your amazing Land Use staff. I
12 have also repeatedly communicated my
13 concerns with the existing Opt-In R10 and
14 voluntary inclusionary housing programs,
15 which cover a good deal of Manhattan,
16 20 percent. I have a map here. I can't
17 share it with you, but it's here.

18 And I am gratified that a
19 written communication has -- commitment
20 has finally been made to immediately begin
21 studying and correcting current flaws
22 within these programs.

23 These changes alone, however,
24 are not enough to address the fundamental
25 concern behind this text framework, that

Proceedings

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2 there is a tension between the
3 Department's decision to give developers
4 greater incentive in the form of
5 additional hype to Opt-Into a voluntary
6 affordable housing program and
7 neighborhood planning efforts over the
8 past two decades which have often,
9 particularly in Manhattan, sought to limit
10 height.

11 The text theoretically could be
12 further refined to exclude wide streets
13 that underwent recent rezonings from
14 additional height increases or it could
15 carefully maintain existing underlying
16 height rules in special districts that did
17 not outline their own specific ones. It
18 could even propose new districts with the
19 new heights to be applied in the future as
20 part of a carefully considered
21 neighborhood plan.

22 Without this degree of careful
23 intervention, I am not convinced that the
24 general changes will be enough to satisfy
25 the concerns of individual community

Proceedings

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2 boards.

3 After much consideration on ZQA,
4 I have found that a significant number of
5 proposed changes, especially those related
6 to height, have the potential to
7 negatively impact the built environment,
8 and that's troubling. I also remain
9 concerned that these changes will not
10 bring us close enough to achieving the
11 text amendment's goals, which we all
12 share, of affordability and quality and
13 result in beneficial changes to Manhattan.

14 I believe some of these measures
15 may undermine the work already undertaken
16 by local residents to set their
17 communities on the path to smart growth
18 while protecting their unique neighborhood
19 character. For example, one proposed
20 change would adjust the maximum building
21 envelopes in those special districts that
22 do not already include any special FAR or
23 building envelope rules to bring them in
24 line with changes that ZQA would make to
25 the quality housing option. There is one

Proceedings

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2 important factor that this change
3 disregards, however. Just because a new
4 height wasn't established does not mean
5 height was not part of the original
6 community discussion or consideration.
7 For all of these reasons, I cannot support
8 ZQA at this time.

9 Then we have the Mandatory
10 Inclusionary Housing Program, which as a
11 concept, I support, and this text, which
12 the Department has already committed to me
13 to improve on, could be the place to
14 incorporate these future heights. Why?
15 Because it will be applied on a
16 neighborhood-by-neighborhood basis, and at
17 that time will be given full consideration
18 and weight of the public process.

19 If the Mandatory Inclusionary
20 Housing Program becomes a law, there will
21 be two types of inclusionary housing
22 programs in New York City, voluntary and
23 mandatory. The existing voluntary program
24 offers developers a benefit, additional
25 zoning density, and I've certainly

Proceedings

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2 participated in this program as a Council
3 Member and as a Community Board Member, if
4 they provide affordable housing within a
5 market-rate project or within a certain
6 distance of their project. They can get
7 this in areas specifically zoned for the
8 Voluntary Inclusionary Housing Program in
9 an all R10 zones, as I showed you on the
10 map just quickly, but I know it's about
11 20 percent of Manhattan that falls into
12 R10 or equivalent.

13 Since becoming Borough
14 President, I have been calling for two
15 things: One, requiring affordable housing
16 to be built whenever there is new
17 residential development and especially
18 when special permits -- I love special
19 permits -- particularly in the future, if
20 they would allow the building of housing,
21 affordable, where it wouldn't otherwise be
22 allowed.

23 Two, fixing the City's Opt-In
24 voluntary affordable housing programs
25 where developers get bonuses for building

Proceedings

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2 affordable housing. This Opt-In program
3 covers significantly more territory in
4 Manhattan than the contemplated
5 neighborhood rezonings in Manhattan, East
6 Harlem and inward would cover. Based on
7 these two premises, I can support the MIH
8 plan for the following reasons:

9 One, in addition to neighborhood
10 rezonings, it would apply to all special
11 permit applications -- the best part of
12 it -- by private developers to add more
13 than ten residential units of housing to
14 any area where this housing couldn't
15 otherwise be built.

16 Two, I have a commitment from
17 the Chair of the City Planning Commission
18 and the Commissioner of HPD to begin
19 crafting changes to the voluntary
20 affordable housing programs that, as I
21 said, cover about 20 percent of Manhattan.
22 These changes would result in developers
23 being required to build more affordable
24 housing when they take advantage of these
25 programs and ensure that affordable

Proceedings

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2 housing is not stigmatizing by getting rid
3 of what has been referred to as poor
4 doors.

5 Three, I have received a
6 commitment from the Chair of City Planning
7 and the Commissioner of HPD to work with
8 neighborhoods on strategies to apply the
9 proposed MIH program in a way, and I know
10 people care about this, to get more
11 housing at the higher and lower ends of
12 the AMI spectrum in neighborhoods that
13 have a need for lower income units and
14 those that have a need for middle income
15 units, respectively, and they have to go
16 way down and work on the middle income.
17 And I think middle income needs to be
18 lower, perhaps, even than what some
19 people want. And I am confident that by
20 working with the Commission and the
21 Council, City Council, we can translate
22 this into more AMI options at both the
23 lower and the higher ends.

24 In addition, I have secure
25 commitments that will go a long way to

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ensure that the Affordable Housing Fund, which is funded by the smaller development projects, will be used in the community district where the money was generated, that the hardship waiver provisions for the program will be significantly tightened at the BSA, and that we can work toward a higher percentage of affordable housing in all of our programs if an offsite option is used.

For this reason, my recommendation is a conditional approval. However -- there are always however -- there are significant conditions much more than tweaks that the program must meet:

Number one, we need to ensure that we are not squandering any opportunities for additional affordable housing in Manhattan. If we are not going to require affordable housing with all new residential construction over a certain size, we need to be certain that the percentages of affordable housing in the mandatory inclusionary areas of Manhattan

Proceedings

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2 are as high as they can be under every
3 option and that we capture as many special
4 permit applications as possible.

5 Two, I think this is obvious, we
6 need anti-displacement and harassment
7 provisions or legal requirements to
8 protect those in the neighborhood being
9 rezoned, and sometimes that's easier said
10 than done, even with funding going to
11 legal services.

12 Three, as I stated, the
13 Commission and Council, City Council need
14 to broaden the AMI options at both the
15 lower and higher ends; otherwise, the
16 program could fail to meet neighborhood
17 needs at a significant cost to the
18 stability of various communities.

19 Number four, the affordable
20 housing must be as integrated as possible
21 in terms of location and distribution
22 within a building or development project,
23 no poor floors, no poor doors, and no poor
24 buildings, and any deviation from this
25 goal should be discouraged by requirements

Proceedings

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2 of additional affordable housing.

3 In summary, the City Planning
4 Commission should seriously consider the
5 recommendations from the individual
6 community boards, borough boards and
7 borough presidents. In the case of ZQA,
8 you should decide whether specific
9 targeted changes will be sufficient to
10 address enough of these issues to justify
11 this text amendment moving forward in the
12 public review process.

13 If you decide these changes
14 can't be accomplished, it may be time to
15 untangle and unburden MIH from ZQA and
16 time to narrow ZQA's focus and ensure that
17 this narrowed focus is fine-tuned enough
18 for the type of citywide impact it will
19 have.

20 And I want to thank particularly
21 your staff and my staff. There's only one
22 Basha Gerhards and one Jim Caras.

23 Thank you very much.

24 (Applause.)

25 THE CHAIRPERSON: Thank you very

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2 much, Madame Borough President. On behalf
3 of the City Planning staff, we also really
4 want to thank you and your staff for your
5 ongoing engagement with us and in a highly
6 constructive way. So -- and we look
7 forward to continuing to work with you and
8 your staff on this.

9 BOROUGH PRESIDENT BREWER: Thank
10 you very much.

11 THE CHAIRPERSON: Questions for
12 the Borough President?

13 Yes, Vice Chairman Knuckles.

14 THE VICE CHAIRMAN: Good
15 afternoon, Borough President.

16 BOROUGH PRESIDENT BREWER: Good
17 afternoon.

18 THE VICE CHAIRMAN: Could you
19 just repeat, you mentioned in your
20 comments regarding ZFA [sic] --

21 BOROUGH PRESIDENT BREWER: ZQA?

22 THE VICE CHAIRMAN: ZQA.

23 BOROUGH PRESIDENT BREWER: Yep.
24 Like I said, they're in our DNA.

25 THE VICE CHAIRMAN: Right. You

Proceedings

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2 mentioned the donut round rowhouses. Could
3 you just elaborate on that? I didn't
4 understand it.

5 BOROUGH PRESIDENT BREWER: Sure.
6 I think the issue there is, you know, it's
7 obviously -- you are trying to accomplish,
8 and if Basha has something to add, she
9 should add, but my understanding is we're
10 all trying to accomplish quality and
11 affordability and there is a concern that
12 if there is a building that is going to be
13 built that the hills and valleys continue.

14 That's what I call it. We want
15 to have the kind of height issues that are
16 currently in existence and that the
17 midblock supports, and there is a concern,
18 maybe unfounded, that the issue of
19 rowhouses could be torn down. I know this
20 is something that people -- others think
21 could not possibly take place. Well, that
22 is a concern that people have.

23 THE VICE CHAIRMAN: Thank you.

24 BOROUGH PRESIDENT BREWER: Thank
25 you very much.

Proceedings

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2 THE CHAIRPERSON: I just want to
3 see if there are any other questions for
4 you.

5 Ms. Efron.

6 COMMR. COHEN EFFRON: Thank you,
7 and thanks to your staff and the Community
8 Boards for the hard work everyone has
9 done.

10 I just wanted further
11 clarification on your question about poor
12 buildings. I assume you're referring to
13 when there's a condo or a co-op and then a
14 rental in the other section, which I don't
15 imagine is for ease of management.

16 BOROUGH PRESIDENT BREWER: I
17 think to the credit of the City, we've had
18 one challenge and problem with the poor
19 door and that's been addressed.

20 I know that, having spent some
21 time on these issues, that developers do
22 understandably like to have, and we've got
23 one proposal before us potentially, where
24 you have a certain floor for the
25 affordable and other floors for the market

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rental even. That is -- we prefer not to do that. I have to give Donald Trump, you know that guy, credit, because the Riverside Boulevard, his rental buildings, you don't know who's affordable and you don't know who is market. You have no idea because I've been in those buildings. So that's what we want in terms of the rental buildings.

We have a situation, which is as-of-right now on the Lower East Side with Extell Building, an affordable building, and a condo building right next to it and that's not preferable. So we have to -- if we're going to go forward, those would be the challenges that we'd like to address. Right now, some of them are legal.

THE CHAIRPERSON: Any other questions for the borough president?

(No response.)

BOROUGH PRESIDENT BREWER: Thank you very much.

THE CHAIRPERSON: Just be

Proceedings

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2 careful, you might find yourself in a
3 Donald Trump campaign one of these days.

4 BOROUGH PRESIDENT BREWER: I'll
5 say it like it is.

6 I'll talk about his other
7 things at another time.

8 THE CHAIRPERSON: Thank you very
9 much, Madame Borough President.

10 The next speaker is Rafael
11 Cestero.

12 MR. CESTERO: Good afternoon,
13 members of the Planning Commission.

14 THE CHAIRPERSON: Good
15 afternoon, and thank you for your
16 patience, and thank everyone here for
17 their patience.

18 MR. CESTERO: Thank you,
19 Chairman Weisbrod, and Vice Chair
20 Knuckles, and all of the members of the
21 Commission. My name is Rafael Cestero and
22 I am the President and CEO of the
23 Community Preservation Corporation, a
24 40-plus-year-old non-profit affordable
25 housing finance in community development

Proceedings

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2 and organization. And I'm here today to
3 express my enthusiastic support for the
4 Administration's Mandatory Inclusionary
5 Housing and Zoning for Quality and
6 Affordability text amendment changes.

7 Let me take a brief moment and
8 explain to you why. I believe that all of
9 these proposals need to be taken in the
10 context of our City's history and of our
11 City's history of affordable housing
12 initiatives and in the context of today's
13 massive affordable housing effort being
14 undertaken by the City.

15 Since the 1990's, New York City
16 has been on a steady and impressive growth
17 trajectory. Over the past 25 years, we
18 have seen populations expand, the City has
19 added new jobs, and by all accounts,
20 public safety is lightyears ahead of where
21 it was in past decades. All of this
22 points to a strong economy that is poised
23 for continued growth, but we must remember
24 that this has not always been the case.

25 Throughout the 1970s and 80s,

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2 large swaths of our City fell victim to
3 blight and abandonment that devastated our
4 housing stock in the communities that it
5 served. From the South Bronx to Harlem to
6 East New York buildings were abandoned,
7 crime was rampant, and hundreds of
8 thousands of peoples fled our city for
9 surrounding communities. It was so
10 bad that it took a courageous decision for
11 Mayor Ed Koch to change our city. Instead
12 of fencing off the South Bronx and other
13 neighborhoods as part of the strategy
14 called Planned Shrinkage, he launched a
15 massive housing investment plan that
16 rebuilt much of our city. Today, New York
17 City is booming in a way that has not
18 happened in generations, and we have
19 become an economic engine for the state as
20 well as the region and points beyond.

21 This unprecedented growth can
22 largely be attributed to our City's legacy
23 of investing in neighborhoods, and in
24 particular, those neighborhoods that were
25 scarred and stigmatized by the most -- the

Proceedings

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2 most by disinvestment and flight. This
3 historical context is important. .

4 Over the last few decades the
5 City has rebounded and gave some enormous
6 pressure on the cost and demand for
7 housing that is driving change across the
8 city. Our housing policies have been
9 varied and expansive, and inclusionary
10 zoning has been a piece of our overall
11 housing strategy but was never intended to
12 work alone. In 1987, New York City issued
13 the first inclusionary zoning plan to
14 incentivize the creation of affordable
15 housing and foster economic opportunity in
16 communities.

17 The Bloomberg Administration
18 took a critical step in recognizing that
19 the city was experiencing large scale
20 change and revamped the Inclusionary
21 Housing Program to better harness the
22 private market to create new permanently
23 affordable apartments. Both policies were
24 set forth in a larger context of Mayor
25 Koch and Mayor Bloomberg's housing plans.

Proceedings

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2 Today, the de Blasio
3 Administration is proposing sweeping
4 changes to our zoning policies. These
5 changes are both innovative in scope and
6 within the context of our City's proud
7 history of investing in underserved
8 neighborhoods in a way that seeks to
9 address the upward pressure of rapid
10 growth and gentrification, and the changes
11 proposed are in the context with the
12 Mayor's remarkable Housing New York Plan.

13 The market pressures our
14 communities face today are not due to
15 policies or politics of either
16 administration. We have done a great job
17 of making this one of the world's premier
18 cities, a place where everybody wants to
19 live and invest, and we have become
20 victims of our own success.

21 The downside is that the City
22 doesn't have unlimited land or unlimited
23 resources, and the scarcity of both has
24 driven up the demand for housing as well
25 as its cost. In putting forth this plan,

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2 the Administration recognizes these issues
3 but also that the dynamics of the New York
4 City market are strong and can be
5 harnessed to create affordable housing and
6 help lock in affordable housing in growing
7 communities.

8 Without seeing the totality of
9 this plan, it is easy to pick apart a
10 zoning strategy as something that would
11 lead to further pressure on low-income
12 communities. When you look at the various
13 policies and the plans that work in
14 concert with one another under the
15 umbrella of the Housing New York Plan, you
16 recognize that this is very far from the
17 truth. MIH and ZQA are two critical
18 programs that will help create affordable
19 housing and mitigate gentrification. They
20 should not and were never meant to be
21 viewed in a vacuum. They must instead be
22 analyzed in the context of the Housing New
23 York Plan and the other complimentary work
24 of the de Blasio Administration.

25 Through the Housing New York

Proceedings

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2 Plan, the City's Department of Housing
3 Preservation and Development, Department
4 of City Planning, along with a myriad of
5 other City agencies, have put forth a
6 series of new programs that will encourage
7 the creation of affordable housing,
8 aggressively pursue preservation of
9 existing affordable housing, mitigate
10 uncontrolled growth, reign in unscrupulous
11 owners, ensure tenant protections are
12 enforced, and direct resources to our
13 City's vital public housing stock so that
14 all of our residents have the opportunity
15 to live in safe and affordable
16 neighborhoods.

17 Without them, I have no doubt
18 that the pressures facing our
19 neighborhoods will get worse. There are
20 some saying no because they don't want
21 neighborhoods to change. That's
22 understandable. But, in truth, these
23 neighborhoods are already changing and
24 that change is moving quickly and it is
25 pushing affordable housing further and

Proceedings

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2 further to the edges of our City and
3 beyond.

4 Mih and ZQA will give
5 neighborhoods an opportunity to maximize
6 resources of their existing housing stock,
7 and will require permanently affordable
8 housing be created when new buildings go
9 up.

10 Thank you.

11 THE CHAIRPERSON: Thank you,
12 Mr. Cestero.

13 I have a question. We heard a
14 number of speakers testify, and just
15 recognizing your former distinguished role
16 as a Housing Commissioner, HPD
17 Commissioner, a number of speakers,
18 actually Borough President Diaz and
19 Borough President Katz spoke about
20 affordable housing programs and affordable
21 housing on a case-by-case basis, many of
22 which were undertaken, I think, when you
23 were Commissioner of HPD and, indeed,
24 those who were very impressive.

25 And I'm wondering if you could,

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2 perhaps given your experience, talk a
3 little bit about what you see as the
4 potential advantage of a mandatory program
5 as opposed to what I think the borough
6 presidents were talking about, of why
7 shouldn't we just do it on a case-by-case
8 basis as been done in the past?

9 MR. CESTERO: Sure. I'd be
10 happy to.

11 I think the important part of
12 this proposal is that it changes the
13 negotiation. It changes the floor, if you
14 will. No longer are we negotiating over a
15 housing project in a particular
16 neighborhood and starting with, I have the
17 ability to build and I have the ability to
18 build without affordable housing. We
19 would be starting with a conversation that
20 says you have to build with affordable
21 housing. And then there would be a
22 negotiation that would happen through the
23 public review process, through the full
24 ULURP process, for each individual project
25 in each individual neighborhood that is

Proceedings

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2 being rezoned.

3 So from my perspective, what
4 that does is it changes the course of the
5 discussion. It allows us to begin with a
6 baseline of affordability built into these
7 projects and it allows us just to have
8 conversation that then says what else does
9 the neighborhood need to support the
10 development that is happening. That's one
11 of the major reasons why I applaud these
12 efforts, because I think while the details
13 will get worked out through the public
14 approval process, this City has a long
15 history of going through these processes
16 and working out details in a way that
17 allows people to feel comfortable with a
18 given proposal. That will happen if we
19 allow this process to go forward, but we
20 will change the conversation in a really
21 dramatic way.

22 THE CHAIRPERSON: Thank you.

23 Any questions, other questions
24 for Mr. Cestero?

25 Ms. Levin.

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COMMR. LEVIN: Mr. Cestero,
thank you for coming.

MR. CESTERO: My pleasure.

COMMR. LEVIN: It's wonderful to
hear you as such a champion of mandatory
inclusionary housing. I think there were
days when I spent a lot of time in your
office telling you it should be mandatory
and you said, nope, it can't be.

MR. CESTERO: That's true.

COMMR. LEVIN: So what a
difference a few years makes.

MR. CESTERO: Times change,
Commissioner.

COMMR. LEVIN: Times change, you
take a different chair.

But that actually leads to the
question I have for you. We've heard a
lot of testimony and it's reflected in the
community boards' recommendations about
the levels of affordability here. A whole
lot of people feel that the households
that are being targeted by the mandatory
program don't reach deep enough into the

Proceedings

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2 low income community, and there's also
3 strong advocacy for including more
4 moderate- and middle- income options.

5 As you look at the work the City
6 did to craft this proposal and to the
7 options that are in front of us today,
8 what are your thoughts about the
9 desirability of adding some additional
10 income bands to the level of options? Is
11 that going to make it work better? Is it
12 feasible for the development community?

13 MR. CESTERO: So, I mean, I
14 would answer that question a couple of
15 ways.

16 First, I think, as I said in my
17 statement, we are slowly but surely
18 advancing on inclusionary zoning and
19 inclusionary housing policies in the City
20 in a way that allows us to evolve. Public
21 policy is an evolution, it always has
22 been, and so I think this is a great
23 evolution, which is why I'm willing to
24 stand up here today and be supportive of
25 it as opposed to in 2004, when I didn't

Proceedings

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2 think the City was right for that
3 evolution component.

4 To get to your question about
5 the income bands, I think we have to be
6 careful not to make the proposals too
7 complicated. As you know, and as we have
8 worked together on over the years, every
9 neighborhood has a different need as it
10 relates to income bands and income
11 targeting, and so I think what the
12 Administration has tried to do is create a
13 floor for the conversation that will then
14 happen when each rezoning comes forward.

15 And so, do I think that in
16 certain neighborhoods tweaking the bands a
17 little bit may make the individual
18 application of the Mandatory Inclusionary
19 Program work better for that neighborhood?

20 I think certainly that that is
21 probably the case. My assumption in all
22 of this is that that will happen when that
23 neighborhood is going through its rezoning
24 and the mandatory application is being put
25 through the public approval process for

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that specific neighborhood.

The question of income targeting is a very neighborhood-by-neighborhood question, it always has been, and it is a very difficult conversation to get exactly right.

THE CHAIRPERSON: Ms. Efron.

COMMR. COHEN EFFRON: You've heard about the billion dollar fund available for the rezonings. Are there any guidelines or anything you wish you had had or suggested that money could be spent on to sort of nudge the market in past rezonings that should be considered in these?

MR. CESTERO: That's a really good question. Thank you.

You know, I think what I would -- my reflection on past rezonings would be that the outcomes that we achieved were -- you know, worked in certain cases and didn't work in other cases. So that, if I had to reflect back on my time working on this issue in City

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2 government, I would say that things that
3 we accomplished on the waterfront, where
4 you had significant density, I think have
5 been the ones that have been most
6 successful. Ones that are interspersed
7 into existing neighborhoods are more
8 challenging. I think ZQA helps with that.

9 I think that the targeting of
10 affordability, what, to me, putting a fund
11 in place does is allow you to get specific
12 with what a neighborhood needs and to try
13 to be very specific about how you're
14 dealing with particular neighborhoods and
15 their particular needs.

16 THE CHAIRPERSON: Ms. Ortiz.

17 COMMR. ORTIZ: Hi, good
18 afternoon. Thank you for your testimony.

19 MR. CESTERO: Sure.

20 COMMR. ORTIZ: You know, you
21 mentioned something that I think
22 undergirds this whole discussion, which
23 is, you know, how just -- right now we're
24 in a housing crisis, in part, because
25 we're not producing enough housing for

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2 folks, regardless of their income level,
3 and that's really putting a lot of
4 pressure on the real estate market and as
5 a result, people who can no longer afford
6 to live in higher rent areas are moving
7 out to lower end areas and rents are going
8 up.

9 How, in your mind, how does this
10 proposal mitigate against that through the
11 creation of, you know, the production of
12 housing? How important is just getting
13 housing units out there to helping keep
14 rents down, you know, with or without
15 affordability?

16 MR. CESTERO: Well, I think you
17 raise a very good point. I think it's
18 enormously important. One of the great
19 things about the Housing New York Plan is
20 the sheer scale of it. The amount of
21 housing production that is going to happen
22 is going to help at many, many levels and
23 so the middle income units that are being
24 created are certainly going to help that
25 targeted population, but it also is going

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2 to expand the supply of housing. There is
3 no doubt that in our City with a less than
4 three percent vacancy rate, the expansion
5 of our housing stock is one of the
6 critical things that we need to do. It's
7 challenging, it's difficult, it's
8 complicated, but people are moving -- this
9 is part of what I was saying in my
10 testimony -- people are moving to this
11 city regardless of whether we implement
12 these kind of programs that will
13 incentivize the creation of the kind of
14 housing that we need. So the market
15 pressures that we're experiencing aren't
16 going to change whether we do this or not.

17 And so, we need to put ourselves
18 in a position to be able to be the most
19 responsive and be able to be the most
20 effective in creating the housing that our
21 City needs, and I think that that's what
22 these proposals do.

23 But clearly, we need housing at
24 all ends and I know it's not popular, but
25 market-rate housing being created, we need

Proceedings

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2 it; we need more affordable housing but we
3 need housing at all levels.

4 COMMR. ORTIZ: Thank you.

5 THE CHAIRPERSON: Any other
6 questions for Mr. Cestero?

7 (No response.)

8 THE CHAIRPERSON: Thank you so
9 much.

10 MR. CESTERO: Thank you very
11 much.

12 THE CHAIRPERSON: The next
13 speaker is Jeffrey Lubell.

14 MR. LUBELL: Good afternoon,
15 Mr. Commissioner and Mr. -- Mr. Chairman,
16 Mr. Vice Chairman, and the members of the
17 City Planning Commission. My name is
18 Jeffrey Lubell. I am the Director of
19 Housing and Community Initiatives at Abt
20 Associates, a research consulting firm
21 focuses on social programs and policy.

22 From 2007 to 2013, I was the
23 Executive Director of the Center for
24 Housing Policy in Washington, D.C, a
25 research and policy organization focused

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2 on housing policy, where I led a series of
3 projects focused on compiling information
4 on promising practices in local housing
5 policies.

6 In my brief testimony, I'd like
7 to take a step back from the details of
8 the specific proposal before the
9 Commission to provide national context for
10 your deliberations. And I've been
11 listening to the very sophisticated
12 conversation you've had this morning and I
13 want to apologize in advance if these seem
14 a little simplistic, but what I am trying
15 to do is just get some national context
16 and urge us not to get mired in the
17 details and not to throw the baby out of
18 the bathwater as we're thinking about kind
19 of what it is we're trying to do here.

20 And my main message is that a
21 Mandatory Inclusionary Housing Policy is
22 an essential part of an effective local
23 housing strategy that has been
24 successfully employed by hundreds of
25 communities around the country to generate

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affordable housing.

Now, housing policy can be very complicated, as you know. There are dozens of different policies to consider and an infinite number of different -- of specific permutations, but overall, there are really four essential components of a housing strategy for a high cost city like New York:

First, it is important to ensure that an adequate number of housing units are being produced by the market to keep pace with demand. Without an adequate supply of housing to meet demand, rents and home prices will rise as we have seen in high cost cities across the U.S.

Second, cities need to ensure that a share of newly produced housing units are rented or sold at below market levels. A Mandatory Inclusionary Housing Policy is one of the most reliable and effective ways to achieve this goal.

Third, cities need to use subsidy to make these inclusionary units

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2 and other units affordable to lower income
3 families that might be impossible
4 otherwise.

5 And finally, it's important to
6 preserve both the affordability and
7 quality of existing affordable housing
8 developments.

9 So a Mandatory Inclusionary
10 Housing Policy plays a critical role as
11 part of a broader comprehensive housing
12 strategy. It's not a panacea, it's not
13 designed by itself to solve every problem,
14 but it is an essential part of a larger
15 housing strategy, and it achieves three
16 key goals.

17 First, it requires developers to
18 produce housing that rents or sells at
19 below market levels.

20 Second, it provides rent
21 restricted units whose affordable the city
22 can deepen by adding additional subsidy.
23 And in light of the conversation this
24 morning, I really want to emphasize that,
25 that there is the ability to take subsidy

Proceedings

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2 and add it to reach deeper income levels.
3 This -- an inclusionary policy can only do
4 so much in light of the market realities,
5 but you do have subsidy that you can
6 combine with it in important ways.

7 And third, it ensures that
8 affordable housing is produced in areas
9 where there is a strong market demand for
10 housing, helping low- and moderate-income
11 households access high demand
12 neighborhoods that offer key amenities,
13 such as high performing schools.

14 A national scan of inclusionary
15 housing policies recently identified 570
16 inclusionary housing programs in 482 local
17 jurisdictions. More than 80 percent of
18 these programs were mandatory. Because
19 these are local policies, there is no
20 definitive national database that provides
21 a running total of the number of
22 affordable units produced, but we do know
23 that a survey of 50 inclusionary housing
24 programs by the Innovate Housing Institute
25 in 2010 reported that they had produced

Proceedings

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2 more than 80,000 units since their
3 adoption.

4 It is difficult to compare the
5 ordinances of one community with that of
6 another for a whole variety of reasons,
7 but I can just say this, that on its face,
8 New York City -- the proposal that's
9 before you is the strictest policy that
10 I'm aware of in a major City in the U.S.

11 THE CHAIRPERSON: That's an
12 excellent sentence to end on, Mr. Lubell.

13 (Laughter.)

14 MR. LUBELL: I can go on if you
15 would like. No, I'm just kidding.

16 THE CHAIRPERSON: Would you
17 please submit the rest of your testimony,
18 but also, if there are questions for
19 Mr. Lubell.

20 Ms. De La Uz.

21 COMMR. DE LA UZ: Mr. Lubell,
22 thanks for being here. I really
23 appreciate the national context. I think
24 a number of housing advocates have been
25 saying that New York City was behind the

Proceedings

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2 eight ball a bit when compared to other
3 cities nationally, especially in high cost
4 cities in proposing mandatory inclusionary
5 housing. I'm glad we're here today to
6 talk about it.

7 I'm just wondering if you have,
8 given your background and your knowledge,
9 I'm wondering if you've had a chance to
10 review the BAE research that underpins the
11 MIH proposal for New York City and if you
12 care to share any thoughts about the
13 possibility of reaching deeper levels of
14 affordability outside of additional
15 subsidy but through MIH given what that
16 study points to.

17 And I'm wondering if, although
18 you've stated that here in New York what
19 is being proposed would be the most
20 aggressive mandatory inclusionary housing
21 in the country, I'm wondering if you could
22 speak to whether other municipalities have
23 more than three choices as it relates to
24 AMI levels; and if you could comment on
25 the success of that compared to fewer

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choices.

MR. LUBELL: A lot of good questions. I'm not sure I have great answers.

I will say this, that, you know, I have a lot of respect Bay Area Economics, they are fine firm. They produced a very thick and complicated report with lots of different scenarios, and you're right that it's important to really look at it carefully and figure out are you asking for enough.

You also need to think about, though, that you're developing a policy that needs to apply citywide and that's challenging, right?

So I don't -- I can't say that I -- I'm going to second guess kind of their conclusions about that, but I think you're asking the right question. I will say that there are a lot of different policies out there around the country that utilize different income targeting levels. It is very common to see targeting at

Proceedings

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2 80 percent or 100 percent or even higher
3 of AMI. And the reason is, you know, most
4 inclusionary policies really focus on what
5 can we ask of developers without subsidy,
6 right? And so, as a result, you're kind
7 of limited by the market dynamics because
8 it's really essential that an inclusionary
9 policy not completely deter new
10 development because you need new
11 development overall. So you're doing this
12 balancing game, right? You want to get
13 the deepest affordability you can without
14 deterring new development.

15 New York City's policy does
16 provide, as I understand it, for the
17 inclusion of subsidy in places where it's
18 needed, so it's a little bit harder in
19 that case to sort of comment on the exact
20 income levels. I will say that it's not
21 common to see targeting down at the
22 60 percent of AMI level in an inclusionary
23 policy by itself. You typically see
24 somewhat higher, higher income levels
25 being targeted just because it's being

Proceedings

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2 applied without subsidy.

3 So on the other hand, it's
4 possible that New York City, given the
5 ability of greater density and given the
6 ability and interest of the market to
7 produce this kind of housing, can do more
8 than other cities. So I, you know, I do
9 think it's -- you want to be careful in
10 comparing this to other cities and really
11 focus on what policy makes the most sense
12 for you given the market dynamics.

13 COMMR. DE LA UZ: Thank you.

14 THE CHAIRPERSON: Ms. Ortiz.

15 COMMR. ORTIZ: Hi. Good
16 afternoon, and thank you for your
17 testimony and giving us some context.

18 I want to take the opportunity
19 to ask a question. One of the issues
20 that's come up is the concern, you know,
21 related to displacement and indirect
22 displacement, you know, the fact that
23 these new buildings and these higher rent
24 apartments will result in a, you know,
25 increased appeal of a neighborhood which

Proceedings

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2 might result in increased rents, right?

3 What -- and given what you've
4 seen across the country when these
5 policies have been applied, under what
6 conditions and what policies are necessary
7 to sort of layer on to MIH, because it's
8 just a regulatory tool at the end of the
9 day? We know we need other things to
10 ensure or prevent displacement, but what
11 do we need to make sure that displacement
12 doesn't occur and can we make sure we have
13 it here?

14 MR. LUBELL: Sure. How many
15 hours do I have to testify?

16 (Laughter.)

17 MR. LUBELL: I just made a list
18 the other day of 52 separate housing
19 policies that communities might want to
20 think about it. It's a lot.

21 COMMR. ORTIZ: Well, I guess in
22 relation to our proposal.

23 MR. LUBELL: No. I understand.
24 I understand. I will say, though, a lot
25 of our work has really been modeled on

Proceedings

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2 what New York City has been doing. New
3 York City more so than other places has
4 been really comprehensive and thoughtful
5 across the full array of spectrum of
6 different policies, but I will cite just a
7 few things.

8 So first of all, you know, it's
9 important ask what will happen without
10 your policy, and the reality is that if
11 you don't, you know, if you don't build
12 new housing, rents are going to go up,
13 right? So it's not inclusionary policies
14 by themselves that tend to lead rents to
15 go up; it's just the limited supply,
16 right? So you need to produce supply
17 just to keep pace with demand otherwise
18 things are going to go up. Inclusionary
19 just gives you the ability to ensure that
20 a share of those units are affordable.

21 So I think the issue of
22 displacement is real. I don't think it's
23 caused by the inclusionary ordinance,
24 except to the extent that you're really
25 using subsidy to create incentives for

Proceedings

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2 development to happen in places where it
3 wouldn't happen otherwise, and there, I
4 think you just need to at least ask the
5 question, is that what you want to do, and
6 the answer may be yes, right? Because we
7 want more units. But it's a separate
8 conversation from can we ensure that a
9 share of new development is affordable in
10 places where it would take place in any
11 event.

12 In terms of the protections, a
13 number of things come to mind. You know,
14 rent stabilization policies, for example,
15 that limit rent increases after someone
16 comes in is very helpful, because what you
17 want to do really is ensure that families
18 have choice. You want to ensure that they
19 have the ability to plan their moves and
20 aren't forced out sort of unduly.

21 A number of communities have
22 looked at condo conversion protections
23 that give people rights of first refusal,
24 they try to provide a notice in advanced
25 planning issues. There are a number of

Proceedings

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2 communities that have looked at ensuring
3 that the legal standards for eviction
4 ensure that a landlord must have good
5 cause before evicting residents, to
6 ensure that there's not just widespread
7 eviction. So those are a handful of
8 policies. I would say there are lots of
9 other ones and I'm happy to talk further
10 at another time.

11 THE CHAIRPERSON: Thank you.

12 Any other questions for
13 Mr. Lubell?

14 (No response.)

15 THE CHAIRPERSON: Thank you,
16 Mr. Lubell.

17 MR. LUBELL: Thank you.

18 THE CHAIRPERSON: And please do
19 submit the rest of your testimony.

20 MR. LUBELL: There's only two
21 sentences but okay.

22 THE CHAIRPERSON: The next
23 speaker is Dawanna Williams.

24 Thank you for your patience,
25 Ms. Williams.

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MS. WILLIAMS: Good morning.

THE CHAIRPERSON: Good
afternoon.

MS. WILLIAMS: Or, good
afternoon now. It's been a long morning.

Good afternoon, Chairman and
Commissioners. It's an honor to be here.
My name is Dawanna Williams. I am the
Founder and Managing Principal of Dabar
Development Partners. We are a developer.
We're a development firm. I am not just a
developer. I am also a stakeholder. I
have lived in many of the communities
which I have developed in Brooklyn and in
Upper Manhattan.

We've developed in specific
neighborhoods such as East New York,
Brownsville, Bed-Stuy, Fort Greene,
Clinton Hill, East Harlem, Central Harlem
and Upper Manhattan. We've been in
business for nearly two decades.

I am here to support Mayor
de Blasio's affordability goals of 200,000
affordable units, and I'm here

Proceedings

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2 specifically to advocate for the proposals
3 of ZQA and MIH, Zoning for Quality and
4 Affordable Housing and Mandatory
5 Inclusionary Housing. I believe that
6 these proposals usher in a new era of
7 affordability, with a goal of not just
8 affordability but also more quality and
9 better buildings. No longer do people who
10 pay the least have to receive the least.

11 There are tangible rules with
12 respect to ZQA that I believe will help
13 to -- help developers with dealing with
14 the excessive limits on size and shape
15 that prohibit the fit-out of well designed
16 buildings. For example, by allowing five
17 additional feet to be used on floors, to
18 allocate for better retail space, for more
19 privacy on first floor units, to provide
20 better ceiling heights for retail spaces
21 that currently go empty or underutilized,
22 and for courtyards that provide more light
23 and air.

24 I am currently pursuing -- I am
25 currently working on a project in Harlem

Proceedings

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2 which was recently rejected for a
3 courtyard that, due to technical
4 requirements under our current zoning.
5 With this proposal, that would not be the
6 case. This building will have lower
7 ceilings at approximately eight feet. It
8 will also offer no amenities.

9 I support the ZQA because
10 tenants, particularly our children,
11 deserve as much light and air as possible.
12 Many of us know, yet we've not talked
13 about, our homes which are a refuge for
14 all of us, particularly for our children.
15 They deserve to have homes that are not
16 just affordable, but that are also high
17 quality and that also are better buildings
18 and equal buildings to those that are
19 market rate.

20 I also support the Mandatory
21 Inclusionary Housing proposal. One
22 hallmark of that program is permanent
23 affordability. As many of us know,
24 affordable homes have slipped out of
25 affordability due to expiration of

Proceedings

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2 regulatory agreements at various levels
3 from the state, federal and local levels.
4 Also, many affordable units have slipped
5 out of affordability due to the
6 maximization of rent stabilization rents,
7 which would then allow certain units to no
8 longer be affordable. With MIH, we ensure
9 that permanent units -- that units are
10 permanently affordable.

11 While not perfect, as pointed
12 out by Borough President Gale Brewer,
13 these provisions are an important vehicle
14 for developers and will incentivize us to
15 seek future rezoning to create additional
16 affordable units.

17 Another example from my firm is
18 that we are pursuing a project, which is a
19 market-rate project, currently in East
20 Harlem. It is in a medium density zone.
21 However, the block, which is nearly fully
22 dilapidated and the project is nearly a
23 full block, provides for only a low
24 density. We are approved, currently, to
25 provide market-rate housing, however, if

Proceedings

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2 given the opportunity under MIH we would
3 provide lower income units as prescribed
4 by MIH to protect tenants from
5 displacement and to add more affordable
6 units to a community that sorely needs
7 them.

8 In conclusion --

9 THE CHAIRPERSON: Boy, your
10 timing is perfect.

11 MS. WILLIAM: -- I advocate fo
12 the proposals of ZQA and MIH in this new
13 era of housing in which we need
14 affordability as well as quality and
15 better buildings while communities and
16 developers can be stakeholders in that
17 change.

18 THE CHAIRPERSON: Thank you very
19 much, Ms. Williams.

20 Questions for Ms. Williams?

21 (No response.)

22 THE CHAIRPERSON: Thank you very
23 much.

24 The next speaker is Elizabeth
25 Strojan from Enterprise.

Proceedings

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2 MS. STROJAN: Hi, good
3 afternoon. On behalf of Enterprise
4 Community Partners, I'd like to thank the
5 City Planning Commission for the
6 opportunity to testify today and for all
7 of your patience for what is sure to be a
8 very long meeting.

9 THE CHAIRPERSON: And for yours.

10 MS. STROJAN: In support of MIH
11 and ZQA. My name is Elizabeth Strojan and
12 I lead the policy work for the New York
13 Office at Enterprise. Enterprise has
14 worked to create and preserve affordable
15 housing in New York and nationwide for
16 nearly 30 years, creating nearly 50,000
17 affordable homes for 114,000 New Yorkers
18 through capital investments, programatic
19 support, and policy advocacy.

20 Despite the sizable investments
21 by our organization as well as our
22 partners in government, the non-profit and
23 private sector, many of whom are here
24 today, we are in the midst of an
25 affordable housing crisis with nearly one

Proceedings

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2 million low-income New Yorkers either
3 homeless or paying more than 50 percent of
4 their income on rent. Countless others
5 are being priced out of their
6 neighborhoods. We all know this.

7 And while these number seem
8 daunting, the problem is solvable and we
9 know exactly how to do it. Affordable
10 housing is the solution and we need a lot
11 more to correct the mismatch between
12 supply and demand. To get more affordable
13 housing in a high cost market like New
14 York, we need to use every tool in our
15 toolbox.

16 While we continue to advocate
17 for additional public resources, we must
18 also use other approaches like the
19 proposed zoning changes. MIH and ZQA
20 will increase the supply of affordable
21 housing and are an important step to
22 setting a new baseline threshold for
23 private sector contribution to affordable
24 housing.

25 To throw these proposals out

Proceedings

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2 because they don't go far enough would be
3 extremely detrimental and would also
4 ignore the other programs and policies
5 addressing the issue from other angles,
6 some of which can be layered on to the
7 proposed changes for deeper
8 affordability. These changes are apart of
9 the solution, not all of it, but we can't
10 solve the problem without these changes.

11 In a time when we see federal
12 cuts to housing programs year after year,
13 we must harness the resources from the
14 private market. Development is driven by
15 the market and will happen with or without
16 a plan to include affordable housing. In
17 fact, development must occur, as we've
18 heard, to accommodate the City's growing
19 population. In neighborhoods where new
20 development will happen, it's important to
21 include developer-provided affordable
22 housing to bolster the City's other
23 initiatives to preserve housing for low-
24 and moderate-income residents.

25 Inclusionary housing would also

Proceedings

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2 further the goals of fair housing by
3 providing opportunities for low-income
4 families to move to or remain in an
5 affluent or gentrifying neighborhoods with
6 access to good schools and other
7 amenities. The ability to create
8 affordable housing in a variety of
9 neighborhoods is key to making sure we
10 keep our City one of opportunity for all.

11 I also want to speak briefly for
12 the benefits of ZQA, which will help
13 reduce the onerous requirements that drive
14 up the cost of development and make
15 affordable and senior housing development
16 difficult. Specifically, reducing parking
17 requirements for senior housing
18 developments near public transit will
19 allow more units to be built for a
20 population hit hard by the affordable
21 housing prices, low-income seniors. A
22 recent study by LiveOn New York, who
23 you'll hear from later, found that many
24 parking lots next to senior housing
25 developments go unused. This is

Proceedings

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2 low-hanging fruit to get more housing for
3 seniors.

4 To be sure, every neighborhood
5 in New York is unique and specific
6 community needs should be addressed within
7 any neighborhood plan. Thus, it is
8 crucial that the Administration listen to
9 the needs and ideas in each community as
10 individual rezonings roll out, as we've
11 heard that they will.

12 Enterprise will be supporting
13 our non-profit community-based affordable
14 housing partners on working with
15 stakeholders to ensure that comprehensive
16 neighborhood plans are able to use MIH and
17 ZQA to meet the needs of individual
18 communities. We appreciate the
19 Administration's willingness to work with
20 these groups to continue to refine their
21 plans.

22 In summary, we need MIH and ZQA
23 to help increase the supply of affordable
24 housing, promote the goals of fair
25 housing, and bring much needed resources

Proceedings

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2 to help us solve our City's affordability
3 crisis.

4 Thank you.

5 THE CHAIRPERSON: Well done.
6 Thank you, Ms. Strojan.

7 Questions?

8 (No response.)

9 THE CHAIRPERSON: Thank you very
10 much.

11 MS. STROJAN: Thank you.

12 THE CHAIRPERSON: The next
13 speaker is Alexa Sewell from the
14 Settlement Housing Fund.

15 MS. SEWELL: Good afternoon.
16 Thank you very much, members of the
17 Commission, for the opportunity to testify
18 and to listen to so many of us today on
19 this important topic. My name is Alexa
20 Sewell. I'm President of Settlement
21 Housing Fund.

22 Settlement Housing Fund, since
23 our founding in 1969, has developed 57
24 projects with over 8,700 apartments,
25 rentals, co-ops, and two-family houses

Proceedings

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2 that are home to more than 25,000 low- and
3 middle-income residents, including a
4 substantial number of formally homeless
5 people. Through affiliates, Settlement
6 currently owns 29 buildings, containing
7 close to 1,700 units, with our largest
8 concentrations of housing and programs in
9 the Mount Eden section of the Southwest
10 Bronx, in Crown Heights, Brooklyn, and in
11 the Two Bridges redevelopment area on the
12 Lower East Side.

13 I'm going to skip some portions
14 of my testimony and just get right the
15 meat of it, which is to say that it's our
16 strong opinion that the proposed Mandatory
17 Inclusionary Housing Program is an
18 important tool to creating and sustaining
19 affordable housing in New York City. MIH,
20 as it's commonly known, is the only
21 surefire way to lock in affordability as
22 part of rezonings and private
23 redevelopment proposals, and importantly,
24 it does this without using very scarce
25 government subsidies.

Proceedings

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2 In particular, we like MIH for
3 four reasons, which I'll try to get
4 through:

5 First of all, it allows for
6 flexibility in income mix. This is not
7 the case with a lot of other programs that
8 we use to develop affordable housing,
9 which will allow us to help work with
10 communities to meet and match local
11 housing needs. The income served by
12 affordable housing must average to the
13 specified AMI, with some lower and some
14 higher. So this is really important
15 flexibility and I think a benefit to
16 neighborhoods.

17 Secondly, and this is important
18 because this is a huge issue in affordable
19 housing development, I really hope it will
20 instill some rationality into land prices.
21 It is increasingly difficult for
22 affordable housing developers to compete
23 with market-rate developers who are
24 willing to pay speculative prices for
25 land, assuming that they will be able to

Proceedings

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2 get higher and higher rents over time.

3 Number three, and you've heard
4 this a lot but it's worth me saying again,
5 it's permanent; this is permanently
6 affordable housing. As a not-for-profit
7 mission-driven organization, Settlement
8 Housing Fund is committed to keeping our
9 housing affordable over the long term, but
10 we're the exception, not the rule. We
11 with 421-a, for example, as the
12 affordability period burns off,
13 market-rate developers have an incentive
14 to convert units to market-rate, so we
15 think that's an incredibly important part
16 of this proposal.

17 And, number four, it's not the
18 only tool. MIH is one of many ways for
19 the City and its development partners to
20 achieve affordability. Settlement Housing
21 Fund is committed to setting aside
22 30 percent of units in all of our
23 developments for extremely low-income
24 tenants which are households earning
25 30 percent of the area median income or

Proceedings

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2 below. Mandatory Inclusionary Housing
3 will help us toward that end by allowing
4 for income mixing but also by creating an
5 environment in which the private market is
6 creating more units affordable to 60 and
7 80 percent of AMI, and as a result, it
8 will allow for scarce city resources in
9 state and city subsidies to be used to
10 create more housing affordable to lower
11 income New Yorkers.

12 I want to say, and this is
13 speaking off the page, that I and I'm sure
14 a lot of other people who are speaking in
15 favor of MIH today, agree wholeheartedly
16 with a lot of the sentiments expressed by
17 people speaking in opposition;
18 specifically, that we really need more
19 housing for people below 60 percent AMI,
20 that the real need for affordable housing
21 in New York City is at lower-income
22 levels, which is 30 percent below AMI.
23 But I strongly believe that this proposal
24 is going to help lay the groundwork for
25 creating those units.

Proceedings

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2 I am also in favor of the ZQA
3 amendments and will submit my testimony
4 for the record.

5 Thank you.

6 THE CHAIRPERSON: Thank you very
7 much, Ms. Sewell.

8 Any questions?

9 Ms. De La Uz.

10 COMMR. DE LA UZ: Alexa, thanks
11 for being here. I appreciate the
12 perspective, especially given the history
13 that the Settlement Housing Fund has.

14 I'm just wondering, you didn't
15 raise this in your testimony but you
16 probably know about it, especially since I
17 believe Settlement has been involved in
18 some of the voluntary programs, in
19 particular perhaps new marketing and
20 lease-up, I'm just wondering -- there's a
21 piece in MIH that speaks to the role of
22 non-profits moving forward. I'm just
23 wondering if you have thoughts about the
24 role of non-profits related to MIH as
25 marketing and lease-up agent that you care

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to share?

MS. SEWELL: Sure. The -- I think, you know, the inclusionary housing to date that Settlement Housing Fund has been involved in, and we have done some really wonderful things with the inclusionary units that have been created, you know, I think first of all, this proposal because it's out there and everybody understands that this is the way it's going to be, the way that people are going to be out there looking for properties and buying properties is going to result in a much stronger negotiating hand for the City and for not-for-profits because people are going to have to be creating these units. They can't come into the City and say, Oh, but we spent a bazillion dollars so you can't ask us to do that because we're not going to be able to do it. Well, you knew it and you have to do it.

We also, you know, like the fact that this proposal really encourages that

Proceedings

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2 the units be onsite or close to onsite and
3 not being sort of shifted all over the
4 City.

5 COMMR. DE LA UZ: Thank you.

6 THE CHAIRPERSON: Any other
7 questions for Ms. Sewell.

8 (No response.)

9 THE CHAIRPERSON: Thank you so
10 much.

11 We're now going to switch to
12 those in opposition. The next five
13 speakers, this is numbers 16 through 20,
14 Edward Melendez, Peter Myette, Batya
15 Lewton, I think, Jennifer Gray-Brumskine,
16 and Reverend Janet Jones.

17 So, Mr. Melendez.

18 MR. OSORIO: Actually my name is
19 Dennis --

20 THE CHAIRPERSON: Good afternoon.

21 MR. OSORIO: Good afternoon. My
22 name is Dennis Osorio. Eddie Melendez was
23 not able to stay as long as this so he
24 asked me to speak instead.

25 I'm here to urge you to vote no

Proceedings

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2 on Mandatory Inclusionary Housing in its
3 current form. The reason why is that poor
4 excess is low. I'm here from East Harlem,
5 representing many residents there, and the
6 majority of residents in East Harlem
7 actually make, and this is families, make
8 less than \$33,000 a year. So in its
9 current form, Mandatory Inclusionary
10 Housing just will not stop the
11 displacement and homelessness of those at
12 the lowest income bands.

13 Yes. I've seen, in my building,
14 I've seen long-term residents actually be
15 forced to move out, move in with family
16 members because of the development that's
17 currently happening in our community.

18 Yeah, that's all I really have
19 to say. Thank you very much.

20 THE CHAIRPERSON: Thank you very
21 much.

22 The next speaker is Peter
23 Myette.

24 MR. MYETTE: Good afternoon and
25 thank you, Chairman, Vice Chairman and

Proceedings

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2 fellow Commissioners for this opportunity.

3 I'm here representing Community
4 Voices Heard and Real Affordability For
5 All to speak in opposition to MIH. I'm
6 also here representing a stakeholder, my
7 wife, Sandra Rivera, who was born and
8 raised in East Harlem, has taught there
9 and as a performing artist, a dancer, has
10 been inspired by and has performed in many
11 venues throughout East Harlem could not
12 come today because she's teaching.

13 We feel that MIH undersells the
14 City as a resource, as a resource of
15 valuable real estate and sells out low-
16 and moderate- income New Yorkers.
17 Developers, per se, do not need the
18 incentives that the plan offers from the
19 standpoint of offering a baseline because
20 we see this as an incentive. If you have
21 the cost up front and the options up
22 front, including the three options about
23 25 percent to 30 percent based on an AMI
24 which is -- AMI which is an unadjusted
25 AMI, say, for instance, for East Harlem,

Proceedings

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2 it's a broad net widely cast AMI, a
3 developer could opt for the 120 percent,
4 and 120 percent crunch numbers do its
5 projections of how many units it's going
6 to build, what style, what amenities,
7 figure out what the NOI is and go forward
8 with their other operating issues, such as
9 approaching current owners of property to
10 obtain such properties for development.

11 We feel that on a case-by-case
12 basis, the same developer goes looking for
13 a project -- or goes looking for
14 opportunities to build in East Harlem with
15 the approaching -- they'll go through
16 ULURP and other processes to determine
17 what might be done, what could be done and
18 what they would have to do by way of
19 providing affordable housing to get things
20 done. We feel that the density bonus,
21 which is the true value of Manhattan real
22 estate certainly, is being sold short by
23 the MIH program because on a case-by-case
24 basis, you would sit down and talk about
25 what are they prepared to give, developer,

Proceedings

1
2 versus the community's needs. .

3 The developers, in addition to
4 what they would get, city subsidies, they
5 are in a position to utilize investment
6 tax credits, possible access of Brownfield
7 credits and possible access of U.S.
8 Treasury new market tax credits. These
9 are all things that they could fit into
10 their mix.

11 The property owner, as tenants,
12 perhaps, maybe goes a contract for sale of
13 the property with a deposit to close on
14 the sale in a couple of years with the
15 incentive to depopulate the building, to
16 vacate the building. With the deposit in
17 hand, maybe the landlord does things to
18 vacate a building. The tenants who are in
19 that building, maybe encouraged to leave
20 for a fee or non-renewal of leases or
21 stipulations of high priced leases and so
22 they move on. This doesn't just effect
23 their situation as to housing; it effects
24 their job situation. Yes, there might be
25 an MOH provision for legal funds, legal

Proceedings

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2 service funds, but that same person with
3 legal representation is still stuck with
4 having to go to hearings and fight for
5 the right to say in their apartment or to
6 keep the rental level that they can
7 afford, meanwhile their job suffers, maybe
8 it effects their performance, and it
9 effects their continuance of employment.
10 Maybe they feel they have to leave the
11 neighborhood. Again, longer commute,
12 perhaps, because they have a job that
13 they've had in their neighborhood or a
14 nearby neighborhood to East Harlem, again,
15 speaking to East Harlem specifically they
16 leave.

17 They've also left A network of
18 contacts in their community; church
19 members, groups that they belong to, other
20 friends and unions, other teaching
21 associates or medical practitioners that
22 they've worked with. Now they've moved
23 somewhere else. They don't have those
24 contacts necessarily that can lead them to
25 a new position, should they lose a

Proceedings

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2 position. We feel these are all not just
3 potential but there's a history of shown
4 gentrification which, cause and effect,
5 would lead to loss of jobs for the
6 residents of East Harlem, many of whom, as
7 was pointed out, fall into that category
8 that, acknowledged by others, that those
9 making 30 percent of the acknowledged high
10 AMI are the ones that most need affordable
11 housing, and they cannot afford the
12 affordable under this MIH.

13 Thank you.

14 THE CHAIRPERSON: Thank you,
15 Mr. Myette.

16 Questions for Mr. Myette?

17 (No response.)

18 THE CHAIRPERSON: Thank you.

19 The next speaker is Batya
20 Lewton.

21 (Applause.)

22 MS. LEWTON: Sorry I have to
23 lower it because I'm vertically
24 challenged.

25 I'm here from the Coalition for

Proceedings

1
2 a Livable West Side. I'm going to not
3 read my testimony because I think Borough
4 President Diaz said it all. We urge you
5 to reject both proposals, but I also have
6 to correct my beloved Borough President,
7 Gale Brewer: Donald Trump did not build
8 those buildings. Hudson Waterfront
9 Associates did. They bought his defaulted
10 mortgage of \$315 million for a little
11 under \$89 million in June of 1984, and I
12 know because I have the SEC Schedule D
13 filing. That would not have been in his
14 character.

15 There are 50,000 units that were
16 supposed to have been registered with DHCR
17 as rent stabilized by developers who got
18 city subsidies. ProPublica did this
19 expose and I want to know what the City is
20 trying to do to recover those 50,000
21 affordable rent-stabilized units, that's
22 number one.

23 And my last statement has to
24 be, I think it's appalling that in a city
25 that was built by unions, that the city is

Proceedings

1
2 not mandating that union labor be used on
3 all of these buildings.

4 (Applause.)

5 MS. LEWTON: At 555 West End
6 Avenue, it's undergoing a conversion,
7 Yesterday was the second accident where
8 somebody was seriously hurt. They are not
9 union workers.

10 (Applause.)

11 THE CHAIRPERSON: Thank you,
12 Ms. Lewton.

13 Questions for Ms. Lewton?

14 (No response.)

15 THE CHAIRPERSON: Am I
16 pronouncing your name right, by the way?

17 MS. LEWTON: Yes.

18 THE CHAIRPERSON: Thank you.

19 The next speaker is Jennifer
20 Gray-Brumskine.

21 MS. GRAY-BRUNSKINE: Good
22 afternoon, ladies and gentlemen. I hope
23 the Commission will allow me extra time
24 because I'm an immigrant, an African
25 immigrant with an accent.

Proceedings

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I'm from Staten Island. I am a member of the Real Affordable Housing Dignity Coalition of Staten Island. I'm a member of the Staten Island African Leadership Council, the Public Relation Officer. I'm also Chairman of the Board of Directors of the Staten Island Liberian Community Association, the larger community outside of Liberia.

There's a huge African immigrant population on the North Shore on Staten Island. We have over 50-60,000 youth between the age of 18 and 24 documented, and we have over a hundred thousand youth between the age of 18 and 24 undocumented. So we have a total of over 150,000 youth on Staten Island and 60 percent of those youth are African immigrants. I know the census data say something different.

My concern here is -- our concern, as the African immigrants and as a member of Make the Road New York, our concern is about the proposal of Mandatory Inclusion Housing, MIH. Madame

Proceedings

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2 Commissioner, Commissioner, one size does
3 not fit all. The last time I checked,
4 size 14 and size 6 is not the same size.
5 Staten Island is not the same size as
6 Manhattan, Staten Island is not the same
7 size as Queens, Staten Island is not the
8 same size as Brooklyn. One size does not
9 fit all. One size does not fit the North
10 Shore on Staten Island.

11 I'm going to be speaking on
12 affordable housing and jobs for the
13 African professional immigrants and the
14 young Africans that are graduating from
15 college.

16 We have one who do not have any
17 public hospitals on Staten Island. So one
18 size does not fit all. MIH will be
19 one-size-fits-all for all solutions for
20 New York City neighborhoods, but we know
21 the North Shore of Staten Island has
22 different needs than the rest of the City.
23 MIH take leverage and power out of the
24 hands of communities and give away density
25 without requiring enough in return.

Proceedings

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Instead, we need vacancy bonus system. Density bonus system work if developeres will want to build higher than as-of-right zoning, they would need to Opt-In to our program. With a density bonus, we can require more affordable housing, good local jobs, and crucial infrastructure improvement. If developers are getting more density, which make their land and buildings more affordable in our community needs, then our communities need more benefits. Our public action is creating a private benefit more valuable and buildings for developers.

I'm going to go over -- I also want to thank the Department of Urban Planning because they have not had a community engagement and their presentation, I wouldn't be here today, because I look at the number, that's what caused me to be here. I said no, it doesn't add up.

According to the Urban Planning design, a family of four for Staten Island

Proceedings

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2 on the North Shore, option number one is
3 25 percent at \$51,000. As an immigrant,
4 professional immigrant, when you come to
5 this country, no matter where you're at,
6 we start at sometimes 20,000 and most of
7 the people on Staten Island on the North
8 Shore, the African immigrants, we are
9 health service provider. Our income, we
10 make the minimum, \$10 per hour. We have
11 to work 70 hours a week to pay our rent,
12 send our kids to school, buy groceries.
13 We cannot afford \$51,000 for the minimum
14 income for the buildings being put up in
15 the North Shore. Please consider that.

16 Option number two, at
17 30 percent, \$69,000, I'd have to work ten
18 years. I'm almost reaching retirement. I
19 would never make \$69,000 working as a home
20 health aide. So that is so unrealistic.

21 And option number three,
22 30 percent at \$102,000, I think I would
23 have to retire and come back and go to
24 Africa and get another job before I can
25 reach that amount.

1 Proceedings

2 In terms of good jobs --

3 THE CHAIRPERSON: Thank you.

4 MS. GRAY-BRUMSKINE: -- another
5 thing is the jobs, the rezoning plan,
6 there's no jobs allocation for the
7 rezoning on the North Shore.

8 I will give you my proposal so
9 you can look at it, but the two things
10 that I would like for you to consider are
11 jobs and the rezoning. You cannot
12 allocate land use for our jobs these days.
13 There's no jobs in the allocation for
14 rezoning on the North Shore.

15 THE CHAIRPERSON: Thank you.
16 Thank you very much.

17 (Applause.)

18 THE CHAIRPERSON: Any questions
19 for Ms. Gray-Brumskine?

20 (No response.)

21 THE CHAIRPERSON: Reverend Janet
22 Jones.

23 MS. JONES: Thank you for this
24 time.

25 THE CHAIRPERSON: Thank you for

Proceedings

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your patience.

REVEREND JONES: I am here as --
I represent -- I'm President of the Staten
Island Council of Churches, a member of
Make the Road New York Housing Dignity
Coalition, and Real Affordability For All
Coalition. And I've heard a lot of
testimony today and I must say that
Mandatory Inclusion Housing is a great
name. I love it. I'd love it even more
if it said Mandatory Inclusion Housing for
all because I'm here to -- because someone
has to be the voice of those who are not
included in this plan. And I know that
you said there were options.

(Applause.)

THE CHAIRPERSON: Please.

REVEREND JONES: That this plan
allowed for housing that would include
people that are below the levels that are
in this plan, but that's interpretation
because it doesn't say that in the plan,
and someone has to stand up and speak for
those who are not written about in the

Proceedings

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2 plan.

3 And so I'm here because in
4 Staten Island, we have more than a third
5 of the people pay more than half their
6 incomes for rent and half the renters on
7 Staten Island pay rents they can't afford.
8 They work just to have a roof over their
9 heads. And the community in Staten Island
10 has been scheduled for rezoning, the AMI
11 for that community is below the 25 percent
12 that are included at the \$50,000 --
13 \$50,000 income level. So if we do not
14 stand up and speak for those people and
15 urge you to consider how this plan can be
16 modified so that it will be written in the
17 plan how these communities will be
18 included. They will just get left out.

19 And of the 57 churches and
20 Christian organizations that make up the
21 Staten Island Council of Churches, we
22 stand to speak up for those people so that
23 their voices will be heard, their needs
24 will be considered, and that you will take
25 seriously the input that you've gotten

Proceedings

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2 from this gathering and will get, because
3 a lot of what I had on here to say has
4 already been said.

5 So I thank you for your time.

6 (Applause.)

7 THE CHAIRPERSON: Thank you.

8 Thank you, Reverend Jones.

9 Any questions?

10 (No response.)

11 THE CHAIRPERSON: Thank you,

12 Reverend.

13 The next speaker is Council
14 Member Benjamin Kallos.

15 He will be followed by the
16 following, switching over to those in
17 favor, the following five speakers after
18 Council Member Kallos will be Bobbie
19 Sackman, Joe Rosenberg, Tomas Rossant,
20 Lisa Sturtevant, and Carol Lamberg, and
21 that is numbers 21 through 25.

22 Council Member, welcome.

23 MR. KALLOS: Chairman Weisbrod
24 and members of the City Planning
25 Commission, thank you for engaging in this

Proceedings

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2 public process and for undertaking this
3 ambitious goal of improving the quality
4 and affordability of our City's
5 development with an ambitious goal of
6 requiring mandatory affordability as part
7 of any new neighborhood rezoning. I'm
8 Council Member Ben Kallos, representing
9 the Upper East Side, East Midtown, East
10 Harlem and Roosevelt Island, and in full
11 disclosure, I do have the privilege to
12 work with the Chairman and therefore he's
13 my constituent and I work for him.

14 THE CHAIRPERSON: You better be
15 careful, Council Member. I'm a voter.

16 MR. KALLOS: I got it.

17 I also represent 168,000 other
18 people and I thank the folks who are here
19 today for coming out today, and I will be
20 going to City Council for our stated
21 session which is my I'm speaking now.

22 The City Planning Commission has
23 an opportunity to protect our
24 neighborhoods, our midblocks, make floor
25 area ratio a three-dimensional measure,

Proceedings

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2 protect our public parks from shadows,
3 build a city that is affordable for all
4 New Yorkers with a strong middle class,
5 with necessary school seats to educate the
6 next generation, and with a plan that
7 reflects the voices and expertise of our
8 City's communities.

9 I am going to bridge my
10 testimony. It's available at
11 benkallos.com, shortly. I'll start by
12 saying thank you for protecting the R8B,
13 our midblocks on the Upper East Side and
14 removing that from the plan.

15 I do have remaining concerns
16 around the R10A, which would see a 20-foot
17 increase on avenues, on wide streets, and
18 a 40-foot increase, that's four stories,
19 on midblocks. I'd like to see a
20 preservation of our hills and valleys.
21 Similarly, large increases happen in R8
22 and R9X of 20 feet and 30 feet.

23 ZQA does improve floor heights
24 for quality housing but it also needs to
25 do so for other residential constructions

Proceedings

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2 where developers are exploiting the fact
3 that floor area ratio is a two-dimensional
4 measure for a three-dimensional building.

5 I've got a 31-story building
6 that will rise 521 feet at 16-foot
7 ceilings in a residential part of my
8 district. A floor story should be 8 to 12
9 feet with any height greater than that
10 divided by 8. In this way, we can upgrade
11 the zoning code from a two-dimensional
12 fiction to a three-dimensional reality.

13 Though not a part of New York
14 City's original Commissioner's plan of
15 1811, central Park is now a part of our
16 city. Municipal Art Society reported in
17 the Accidental Skyline, and as we see in
18 the Billionaires' Row developments across
19 57th Street, we have an opportunity to
20 stop these superscrapers that are casting
21 shadows in our parks forever.

22 ZQA is already amending
23 Section 23-65(c)(1), which prevents the
24 building of superscraper towers, piercing
25 the sky exposure plane within 100 feet or

Proceedings

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2 across the street from a public park. I
3 beg the City Planning Commission to simply
4 add a zero to the zoning text, already
5 subject to amendment, to expand this
6 protection from 100 feet to 1,000 feet
7 from a public park. Additionally, this
8 prohibition could also apply to any
9 building that would be tall enough to cast
10 shadows on our public parks.

11 ZQA has another chance to amend
12 the zoning code to stop developers from
13 taking density that's been spread all over
14 the city, a borough or a community
15 district, and using air rights and zoning
16 lot mergers to pile it all in one place
17 for a density that could never have been
18 constructed let alone thought of when the
19 zoning code was originally drafted.

20 I share the Mayor's goal for the
21 construction of affordable housing, but we
22 need to create a mixed-income housing,
23 rather than looking only at the number of
24 low-income units created. I'm concerned
25 that the income inequality we are trying

Proceedings

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2 to fight will only be exacerbated as we
3 incentivize the construction of housing
4 for low-income and luxury units. They
5 will only continue to force middle class
6 from our City.

7 The Workforce option should
8 be -- Mandatory Inclusionary Housing
9 currently includes a Workforce option with
10 the affordable housing for middle class
11 New Yorkers, which would not be available
12 in neighborhoods with strong markets, such
13 as the district I represent. However, the
14 Upper East Side is seeing middle class New
15 Yorkers displaced and forced out in favor
16 of much wealthier, which is unsustainable.

17 The Workforce option should be
18 required in addition to low income
19 affordable housing, specifically because
20 neighborhoods with a strong market can
21 support this additional housing. Existing
22 affordable housing financing, available
23 from HDC or HPD, for mixed-income
24 development provides a model for
25 affordable housing that will create a

Proceedings

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2 diverse city with room for people of all
3 classes.

4 Our city already incentivizes
5 for construction of affordable housing,
6 allowing developers to quintuple dip with
7 increased density, tax relief, unit
8 subsidies, low interest loans, floating
9 air rights. If we are giving additional
10 height, we should be getting additional
11 permanent affordable housing onsite
12 without a poor door, without a rich
13 building/poor building. We should not let
14 developers buy out of affordable housing
15 by writing a check through payment in lieu
16 of -- through payment in lieu of, as cash
17 disappears and property is gone forever.

18 Just as we are planning for more
19 senior housing, we must also address
20 another critical issue facing the City:
21 Overcrowding in schools. New buildings
22 continue to rise at a pace that will only
23 increase following your proposed zoning
24 changes. As our City's population
25 increases with this influx of residential

Proceedings

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2 units, the demand for school seats will
3 only rise, even as the availability of
4 land on which to build new schools
5 existing consequently vanishes. Right
6 now, many students are being forced to
7 attend schools far away or squeezed into
8 overcrowded classrooms. According to the
9 School Construction Authority's Five-Year
10 Capital Plan released in May of this year,
11 the City will need 49,245 school seats by
12 2019 in order to alleviate overcrowding,
13 yet we are only planning to fund the
14 creation of 31,823. I propose that the
15 City Planning Commission include
16 incentivizes in the ZQA for developers to
17 build new schools.

18 Recommendations and reports have
19 been set forth by the Friends of the Upper
20 East Side Historic Districts and CIVITAS,
21 funded, in part, by discretionary funds
22 from my office. These two organizations
23 have lent their considerable talent and
24 expertise, which I support, and hope to
25 see integrated into the plan brought

Proceedings

1
2 before the City Council.

3 I stand with our community
4 boards. I share the concerns raised in the
5 November 30th resolutions of the Manhattan
6 Borough Board and request that the City
7 Planning Commission amend its zoning
8 proposals in accordance with these
9 resolutions prior to coming before the
10 City Council. The voices of our
11 communities and the people of New York
12 matter.

13 Thank you for your time.

14 (Applause.)

15 THE CHAIRPERSON: Thank you,
16 Council Member.

17 Questions for Council Member
18 Kallos?

19 (No response.)

20 THE CHAIRPERSON: No. I will
21 just say thank you for your advocacy for
22 my island.

23 MR. KALLOS: Thank you.

24 THE CHAIRPERSON: Okay. The
25 next speaker is Bobbie Sackman.

Proceedings

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MS. SACKMAN: Good afternoon.

THE CHAIRPERSON: Good
afternoon.

MS. SACKMAN: LiveOn New York is
a non-profit organization whose mission is
to make New York City a better place to
age.

Our Affordable Senior Housing
Coalition is comprised of 25 of the
leading non-profits who have been
providing senior housing for decades;
altogether they provide 20,000 units of
housing. And we're in support of ZQA.

We did a parking lot study that
was released in May, so our question was,
if there was available land to build
affordable senior housing across the city,
would you use it.

And I want to expand on
something. We've heard a lot recently
about independence of seniors, are we
taking their cars away. I want to talk
about independence, well, from somebody
who's about to be 67 in a week and I

Proceedings

1
2 represent people in their 60s, 70s, and
3 80s who don't have money; their incomes
4 are below \$15,000 a year, even \$12,000 a
5 year. They can't afford a car. Usually
6 these buildings run vans to help them get
7 around.

8 Our study was done based on a
9 minimum of 50 units of housing. We've
10 identified 39 lots. You can build 2,000
11 affordable senior units on those lots.
12 There are tens of thousands of seniors
13 waiting five to ten years. If you're 75,
14 80, you don't have five to ten years, so
15 when we're looking at decades of the
16 somehow a perfect plan, these people don't
17 have the time for a perfect plan.

18 When you're living in an
19 apartment that's a walk-up, that you're
20 homebound, that maybe you can't use your
21 wheelchair, it's unsafe, you're paying not
22 only over 50 percent of your income on
23 rent, you're paying over 80 percent of
24 your income on rent and you're already on
25 SCRIE. That is not independence.

Proceedings

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2 Independence is living in
3 affordable housing. Independence is
4 having a community and social workers
5 around you, knowing you're safe, knowing
6 you can afford your medicine, your food
7 and everything else. So I really want to
8 be clear in this one piece of this big pie
9 what independence looks like, and I know
10 this well. Your relationship with time
11 changes as you get older. They don't have
12 time. These people don't have time to
13 wait, and we think ZQA will allow these
14 parking lots to be developed because right
15 now we have predevelopment could take
16 eight years, two more years to build. You
17 just lost ten years. You just lost a
18 generation of seniors in a community.
19 This will allow for the parking lots to be
20 used for development. If the parking lots
21 are too small, they could be senior
22 centers.

23 And by the way, when we talk
24 about community amenities, we should take
25 into account schools, but the fastest

Proceedings

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2 growing demographic in this city is old
3 people. So let's make sure that the
4 amenities that any neighborhood
5 approach -- you know, we support a
6 neighborhood approach, and it includes
7 what seniors need. And yes, there's
8 medical facilities, of course, but it's
9 more than just -- growing old is not just
10 about medicine.

11 So I -- please, we have these
12 2,000 units and please keep in mind that
13 if ZQA doesn't go through, they will sit,
14 they will just sit. And then how do you
15 turn to the senior that calls your office
16 as elected officials desperate for
17 housing, why that parking lot is not being
18 used?

19 Thank you.

20 (Applause.)

21 THE CHAIRPERSON: Thank you,
22 Ms. Sackman.

23 Any questions for Ms. Sackman?

24 Ms. De La Uz.

25 COMMR. DE LA UZ: Ms. Sackman, I

Proceedings

1
2 just want to say first, thank you for
3 undertaking the study that you did. I
4 think it was very, very helpful.

5 And I think part of the
6 confusion that's going on in the
7 conversation is about parking in general
8 in the City of New York versus parking at
9 low-income affordable and senior
10 developments, and those are two very, very
11 different things.

12 And I also appreciate your point
13 about the sense of urgency about that.

14 MS. SACKMAN: Thank you, and
15 thank you for pointing that out. It does
16 get mixed together.

17 The only people that are
18 supposed to be using these parking lots
19 are residents of the buildings. The DMV
20 study, done by the Department of City
21 Planning, showed five to eleven percent,
22 and that's like two or three cars. So
23 please understand that these are people
24 that usually can't even even afford to own
25 a car and there's no waiting lists for

Proceedings

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2 parking; there are waiting lists for
3 housing.

4 THE CHAIRPERSON: Thank you very
5 much.

6 And you've submitted your study
7 to us?

8 MS. SACKMAN: Yes, and it's also
9 on my website.

10 THE CHAIRPERSON: Good. Thank
11 you.

12 (Whereupon, Garry Torres
13 replaces Jennifer Cassella as the hearing
14 reporter.)

15 THE CHAIRPERSON: The next
16 speaker is Joe Rosenberg from the New York
17 Archdiocese and Catholic charities.

18 MR. ROSENBERG: Good afternoon,
19 Chairman Weisbrod, and members of the New
20 York City Planning Commission. I'm Joseph
21 Rosenberg, Director for Catholic Community
22 Relations Council, representing the
23 Archdiocese of New York and the Diocese of
24 Brooklyn on legislative and policy matters
25 of New York City. I'm pleased to express

Proceedings

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2 our continuing support of the Mayor's
3 housing plan and several of the specific
4 zoning proposals that are before you
5 today.

6 We can all agree that our city
7 is in desperate need of affordable
8 housing. This crisis is evident in the
9 financial burdens that has threatened the
10 displacement of families from their
11 apartments. It is vivid in the plight of
12 the homeless in shelters and on our
13 streets. The means to help confront and
14 address many of these challenges are
15 contained in the Mayor's housing plan, and
16 the proposal that are the subject of
17 today's hearing.

18 Providing assistance to the
19 poorest and most vulnerable New Yorkers
20 has long been a priority of the Catholic
21 Church in New York City. Consistent with
22 that mission is the continuing focus on
23 preserving affordable housing.

24 Over the last several decades,
25 the Archdiocese of New York and the

Proceedings

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2 Diocese of Brooklyn, through Catholic
3 charities, parishes and community-based
4 affiliates have maintained thousands of
5 housing units for the working poor, the
6 elderly, the homeless, and people with
7 special needs. The Catholic Church in our
8 city continues to focus on its
9 long-standing mission of administering to
10 the poor and the needy. As a result, it
11 is one of the largest providers of
12 low-income senior citizen housing in New
13 York.

14 In the Diocese of Brooklyn and
15 Queens, 2,300 units of low-income housing
16 for the elderly are owned and operated by
17 Progress of Peoples, an affiliate of the
18 Catholic Charities. Their waiting list
19 exceeds 16,000 individuals.

20 The Institute of Human
21 Development, Catholic Charities of the
22 Archdiocese of New York also owns and
23 operates hundreds of low-income units for
24 seniors throughout Manhattan, Staten
25 Island, and The Bronx. Our city today

Proceedings

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2 bears little resemblance to the New York
3 of decades past, where large swaths of
4 vacant, public and privately owned land
5 were available for the development of
6 affordable housing.

7 Accordingly, new methods need to
8 be created to meet the challenges facing
9 all of us. The ZQA proposal before you
10 contains several of these that are
11 specially geared to assist low-income
12 seniors.

13 Parking in many developments is
14 expensive to construct and often not
15 needed. Such is the case where the
16 proposed buildings located close to public
17 transportation. Even more significantly,
18 space and financing spent on parking
19 facilities in neighborhoods and
20 residential developments where car
21 ownership is very low reduces the ability
22 of the property owner to maximize the
23 existing space to provide additional
24 affordable housing. The ZQA would provide
25 that no parking be required for new

Proceedings

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2 construction of senior and affordable
3 housing that is within half a mile of a
4 subway station. This would go far in
5 spurring construction of housing,
6 especially for the elderly.

7 Another significant provision,
8 would also permit the owners of existing
9 low-income senior housing to eliminate
10 parking as-a-right, and allows owners of
11 existing affordable housing to do the same
12 through BSA, when they are located near
13 subways. Freeing up unused vacant land
14 adjacent to existing developments to help
15 developers facilitate production of
16 affordable housing, especially for
17 seniors, benefits all of us. It is
18 important to create affordable housing
19 units and not parking spaces for unneeded
20 and unwanted cars.

21 The ZQA also provides design
22 flexibility that would have an impact on
23 the construction of affordable housing by
24 allowing the construction of community
25 facilities on the ground floor to cover an

Proceedings

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2 entire lot without rear yard setbacks.
3 Without this proposed modification, in
4 many instances, the community facility
5 would have to encompass two floors of the
6 development, thereby reducing the number
7 of housing units that can be built on
8 site. Although a subtle provision, it is
9 one that can help to the generate
10 additional affordable housing.

11 These are just several examples
12 contained in the amendments before you
13 that would spur the production of
14 affordable housing, and they all have our
15 strong support.

16 Thank you.

17 THE CHAIRPERSON: Thank you,
18 Mr. Rosenberg.

19 Questions for Mr. Rosenberg?

20 (No response.)

21 THE CHAIRPERSON: Thank you very
22 much.

23 Next speaker is Tomas Rassant.

24 Am I pronouncing that correctly?

25 MR. RASSANT: Yes.

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THE CHAIRPERSON: Good. Good
afternoon.

MR. RASSANT: Good afternoon,
Chair Weisbrod, Commissioners, thank you
for hearing my testimony. I am Tomas
Rassant and the current President of the
American Institute of Architects, New York
Chapter, and I'm kind of excited and
delighted to be, I think, the first
architect to the podium, because
architecture does matter in this
discussion.

AIA New York is the largest
organization of allied architectural
professionals in the City, and with over
2,000 -- 5,200 members, we are the largest
chapter of AIA in the country.

Today I represent our Policy
Boards' opinion on the ZQA amendments, and
MIH. Having taken the council of our
Housing Committee, our Planning and Urban
Design Committee, our Building and Zoning
Codes Committee, and our Preservation
Committee, because all of those

Proceedings

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2 committees' opinions and all of what they
3 are charged with watching in the physical
4 City are affected by these two proposals.

5 AIA New York supports the ZQA
6 and MIH amendments for their foundational
7 and aspirational goals to improve the
8 social fabric and the physical fabric of
9 our great city.

10 We've written a letter of
11 testimony, and we are submitting that.
12 And I would like to just read two
13 sentences from the first paragraph: "AIA,
14 New York, supports ZQA and MIH revisions,
15 because they will help facilitate the
16 construction of affordable and
17 senior-orientated housing, offer
18 architects more flexibility to create
19 better buildings more responsive to local
20 context, spark the development of many
21 surface parking lots and empty lots with
22 irregular dimensions, and decouple the
23 creation of housing from parking
24 requirements; thereby, encouraging the use
25 of mass transit and enabling a more

Proceedings

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2 sustainable city.

3 "The proposed zoning text
4 amendments can improve the City's built
5 environment, and streetscapes for many New
6 Yorkers, advanced projects that support a
7 liveable city, and increase economic
8 activity within the architecture,
9 engineering and construction markets,
10 bolstering the creation of jobs." That
11 letter is submitted.

12 Just very briefly, ZQA and two
13 components, quality and affordability. On
14 the affordability front, I met with
15 developers and looked at irregular lots
16 that are now fallow and used as dumps,
17 asked them if ZQA passed, would you
18 develop housing in those types of lots in
19 Queens, Brooklyn and The Bronx? Yes.

20 I've sat across Catholic
21 Charities and other not-for-profit housing
22 groups who own surface parking lots that
23 are empty and unused and asked, if ZQA
24 passed, would you immediately prepare
25 plans to build? Yes was the answer, if we

Proceedings

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2 were relieved from the onerous condition
3 of -- the financial condition of building
4 parking related to housing.

5 But here, perhaps, I am best
6 qualified to talk about quality. There is
7 a simple and maybe simplistic
8 understanding in the layman community that
9 height equals quality, and height is what
10 governs contextualism. Architects take a
11 nuanced approach. Certainly height is an
12 issue, but we are delighted that ZQA
13 finally trusts us to act with more nuance
14 in terms of shaping our streetwall.

15 We do work for developers, and
16 developers drive the housing market, but
17 developers will always be driven by the
18 profit motive and the current zoning
19 forces us to make terrible buildings. The
20 ZQA, if passed, will allow developers to
21 still spark new housing construction, and
22 we believe the trade-off in a moderate
23 increase in height with the new freedoms
24 to modulate the streetwall -- usually,
25 actually many historic features will make

Proceedings

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2 for a much more contextual and successful
3 physical city.

4 MIH and ZQA, some have talked
5 about decoupling. They cannot be
6 decoupled. Legislatively, they probably
7 could be decoupled, but they would be
8 hollow if they are decoupled. Looking at
9 that picture (indicating), last two
10 building booms, there has been a tidal
11 wave of market rate and luxury housing.

12 The current process of
13 delivering affordable housing does not
14 work piecemeal. When people say one size
15 does not fit all doesn't work, well, it
16 hasn't worked, because we have not kept
17 pace. We need now, a tidal wave of
18 affordable housing. And I applaud this
19 Commission, I applaud this Administration
20 for finally pulling the all the levers
21 available to them though an as-of-right
22 process to at least attempt,
23 optimistically, to generate this tidal
24 wave going forward.

25 The process is working. The

Proceedings

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2 census is being built. There is optimism.
3 We have specific ideas of how things have
4 to change in terms of the amendments, but
5 for time consideration, it certainly
6 parallels the proposals that Gale Brewer,
7 Manhattan Borough President, has put
8 forward.

9 THE CHAIRPERSON: Thank you.

10 MR. RASSANT: Lastly, your staff
11 has been fantastic, transparent,
12 accessible, engaging, and highly
13 educational.

14 Thank you.

15 THE CHAIRPERSON: I'll always
16 allow that last sentence to come in.

17 Thank you, Mr. Rassant.

18 Any questions for Mr. Rassant?

19 COMMR. CANTOR: Yes.

20 THE CHAIRPERSON: Mr. Cantor.

21 COMMR. CANTOR: Thank you.

22 First of all, congratulations on
23 your new position. I say that with some
24 trepidation, because I know what you're
25 going through.

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Mr. RASSANT: Thank you.

COMMR. CANTOR: You referenced the parking issue, and the parking issue in Manhattan is very different than the parking issue in parts of Queens and the other outer boroughs, particularly, when you get to the end of the train line. Because, in Queens, certainly, I think 2/3 of Long Island parks about a block-and-a-half from the subway, which is creating a constant fight for space from people who live in the area.

I'm curious as to what your response would be with respect to that issue and why you still think it's a good idea to limit eliminate parking requirements completely from the senior citizen housing?

I recognize if you took the senior citizen housing unto itself, then the argument for minimal parking makes sense, but put it in the context of a neighborhood which is being flooded by out-of-town cars and you're building new

Proceedings

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2 housing; you're not accommodating existing
3 housing and existing automobiles. Could
4 you share your thoughts with us on that?

5 MR. RASSANT: Yes. First of
6 all, one of the suggestions we have is to
7 take a finer look at where housing is in
8 all the boroughs and its relationship to
9 mass transit and maybe have the Commission
10 make some adjustments to those things. We
11 talked to people in the Rockaways. We
12 talked to people in Queens. Certainly,
13 some people contest that they are in
14 transit rich neighborhoods. And I think
15 that that has to be looked at.

16 It is imperative for this city
17 to move away from car culture. Other
18 levers in city government, other
19 commissions have to be employed about how
20 we deal, the DOT traffic, Port Authority
21 deals with tolls with these out-of-town
22 cars coming in. But ultimately, we do
23 think it needs to be moderately adjusted,
24 but it's to the benefit to spark more
25 housing.

Proceedings

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2 Again, the tidal wave has
3 happened, Commissioner; so much market
4 rate and luxury has happened, and not
5 enough affordable, that we have to take
6 some risks on these things.

7 One of the last things I didn't
8 get to say is, as someone who lives
9 between to two blue books of the zoning
10 resolution every day, is zoning changes
11 have consequences. We need to go forward
12 optimistically, pass these things with
13 changes, and then measure and observe the
14 unintended consequences and come back here
15 to this Commission and say, well, that
16 parking thing didn't work or that didn't
17 work, and tweak it again.

18 But we should not be scared to
19 jump in this direction, because our City
20 needs more affordable housing, a tidal
21 wave of it.

22 COMMR. CANTOR: There's no issue
23 on that, at least for me.

24 THE CHAIRPERSON: Thank you,
25 Mr. Rassant.

Proceedings

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2 Any other questions for
3 Mr. Rassant?

4 (No response.)

5 THE CHAIRPERSON: Thank you very
6 much.

7 Our next speaker is Lisa
8 Sturtevant from the National Housing
9 Conference.

10 MS. STURTEVANT: Good afternoon,
11 and thank you for the opportunity to
12 testify today. My name is, Lisa
13 Sturtevant. I'm Vice President for
14 Research at the National Housing
15 Conference, Director of the same Housing
16 Policy. You heard from my predecessor
17 earlier. We are a D.C.-based nationally
18 affordable housing organization that
19 provides resources and research around
20 state and local housing policies as well
21 as federal housing issues.

22 For nearly a decade, we've
23 looked at inclusionary housing issues.
24 We've worked with NYU's Furman Center to
25 study the effectiveness of different

Proceedings

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2 designs of inclusionary zoning policies,
3 and last year we developed the data base
4 of a nationwide scan of local inclusionary
5 housing policies adopted by cities across
6 the country. So I'm here to represent NHC
7 to provide support on the proposed MIH,
8 providing a little bit of research to back
9 up that support.

10 The ability to maintain a
11 vibrant and sustainable community and to
12 ensure that a city's local economy is
13 strong is really strongly tied to ensuring
14 that there's housing that's affordable to
15 individuals and families all along the
16 income spectrum. And inclusionary housing
17 has been particularly effective in high
18 land costs and with a strong market
19 demand.

20 Indeed, a well designed
21 inclusionary housing program is one of the
22 best ways to create affordable housing
23 options in neighborhoods that have good
24 opportunity, good schools, good transit
25 access, and other amenities. And as we've

Proceedings

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2 heard from researchers, Raj Chetty and
3 others, place matters. And so the ability
4 to live in these low poverty, high
5 opportunity neighborhoods is associated
6 with better education and economic
7 outcomes and better health outcomes for
8 children and adults. An inclusionary
9 housing policy can be instrumental, then,
10 in creating housing opportunities in these
11 neighborhoods that would not otherwise be
12 made available.

13 The ability of an inclusionary
14 housing program to meet the demand for
15 affordable housing is really tied to it's
16 design, and I think that's what we're
17 hearing a lot about, is the specifics.
18 And in our view of local IZ programs
19 across the country we found that there are
20 several program elements that are
21 associated with more successful programs,
22 and your program adopts many of those
23 elements that have shown to be successful.

24 We've touched on the issue of
25 mandatory versus voluntary. About

Proceedings

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2 80 percent of the 500 plus programs across
3 the country are mandatory, including
4 programs in San Francisco, Los Angeles and
5 D.C. When programs are mandatory, they
6 produce more units, affordable units.
7 They also have provided research that's
8 shown predictability for the development
9 community and for community members, which
10 is sometimes harder to measure but almost
11 equally important.

12 Within this framework of a
13 mandatory policy, linking requirements to
14 rezoning and allowing some flexibility
15 with compliance mechanisms have also been
16 shown to be essential components of
17 successful programs. We found many
18 communities tying IZ programs to
19 rezonings, particularly when there's been
20 a legal challenge associated with
21 mandatory requirements, and this has
22 allowed cities to adopt mandatory programs
23 and have so far withstood legal
24 challenges. Allowing some flexibility,
25 even while there are clear direction, has

Proceedings

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2 also been beneficial. As you know,
3 development and demand varies from
4 neighborhood to neighborhood, but having
5 options has always been trading -- needed
6 to be traded off about having clear
7 guidance for compliance.

8 When offsite options are
9 offered, which we talked about here,
10 requiring developers to build within the
11 same neighborhood or within a certain
12 distance from their proposed project is
13 important for creating housing options in
14 high opportunity areas. Even if not in
15 the same building, the benefits of
16 creating those opportunities in the same
17 neighborhoods have been shown in the
18 research that that neighborhood access is
19 what truly has the most significant
20 benefits.

21 The most successful inclusionary
22 programs require permanent affordability,
23 as yours does. In fact, permanent
24 affordability is sort of the standard now.
25 And as you look at expiration of other

Proceedings

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2 government subsidies, the ability to
3 create permanently affordable housing
4 really falls to inclusionary zoning
5 programs. And so focusing on that has
6 been important.

7 There's been concerns that
8 mandatory inclusionary housing programs
9 can depress overall supply. The research
10 says that's not the case, that in strong
11 markets, housing construction continues,
12 so, you know, the needs are great.
13 Government working with the private sector
14 is essential, and as you all know,
15 inclusionary housing is but one tool in a
16 sort of, you know, set of tools that the
17 City needs to reach the housing needs of
18 all of the residents.

19 So thank you for the
20 opportunity.

21 THE CHAIRPERSON: Thank you.
22 Thank you very much, Ms. Sturtevant.

23 Any questions?

24 Aha. We'll start with
25 Ms. Levin, then Ms. Efron, then

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Ms. Ortiz.

COMMR. LEVIN: Now,

Ms. Sturtevant, one of your colleagues in the affordable housing world, Ms. Sewell from the Settlement Housing Fund, said that she hopes that the mandatory program would inject some rationality into the land market, and you cited the link between successful inclusionary programs and areas of high land cost.

Does your data tell you anything about the effect that a mandatory housing program has on the land market in general? Can we expect some moderating of land costs, which of course, would have benefits not only for the affordable housing but for market rate housing in general.

MS. STURTEVANT: Right. So what the research has shown -- well, first of all, I'll cite -- sometimes it's best to look at places that have long-standing mandatory programs, and Montgomery County, Maryland is the one that comes to mind

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2 probably for you all, and for most people.

3 When you talk to developers
4 working in Montgomery, Maryland, it is the
5 cost of doing business there. It is
6 entrenched in their development decisions
7 and it has worked its way out so that it
8 is -- it's not something that increases
9 cost but it's just, rather, sort of how
10 business gets done.

11 In the short term, the research
12 has shown that when mandatory inclusionary
13 programs were put in, the affect on prices
14 and rents on the market-rate side are
15 minimal and disappear over time. And so I
16 think there's reason to suggest that as
17 the mandatory requirements become the, you
18 know, the way business is done, that
19 the sort of effects on land prices and the
20 home prices and rents starts to I
21 ameliorate.

22 I don't think there's any
23 research that suggests that land prices
24 fall as a result; however, the fact that
25 the development process is more certain,

Proceedings

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2 which reduces the cost overall of
3 development in terms of wait time and
4 meeting time and the other times requiring
5 negotiation, it's hard to measure that,
6 but you see how there might be some
7 savings on that end that might result over
8 time.

9 THE CHAIRPERSON: Ms. Efron.

10 COMMR. EFFRON: You may have
11 answered it inadvertently by talking about
12 predictability and its value in the market
13 place, but is there any -- we've been
14 hearing from many of these supporter and a
15 few of the opponents about the importance
16 of senior, affordable senior housing, and
17 that subsection of the affordability
18 market.

19 Is there anything that perhaps
20 you want to point to in our affordability
21 for senior housing that would be
22 particularly useful perhaps to counteract
23 some arguments that we've been hearing
24 about concerns, including the size, rear
25 yard and other aspects?

Proceedings

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2 MS. STURTEVANT: So I don't know
3 as much about the non-MIH proposal that's
4 under review.

5 On the senior housing front,
6 though, I will suggest that there are
7 communities across the country that are
8 dealing with the same aging population and
9 the fact that senior units can often be
10 smaller; and so, the same building
11 envelope can accommodate more housing with
12 the sort of same outward appearance, I
13 think it's things that people are
14 struggling with across cities.

15 I think there is a suggestion
16 that with the aging of the senior -- of
17 the population, there is an opportunity to
18 do some innovative stuff, maybe stuff we
19 haven't done before. Stuff where people
20 may live in one home, and they may have
21 violated certain zoning codes about who
22 can live together, but you can then bring
23 care to that one home. And so, they can
24 age in place, remain in their home.

25 And so I think the idea is to be

Proceedings

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2 sort of flexible, to be innovative when
3 you think about how to serve the needs of
4 this growing population.

5 THE CHAIRPERSON: Ms. Ortiz.

6 COMMR. ORTIZ: Hi. Thank you
7 for your testimony. I'm really glad you
8 brought up the issue of onsite, you know
9 versus offsite, and that's come up a
10 number of times today. And you pointed to
11 research, and I like to think we make
12 decisions based on what we know works, and
13 what doesn't. And you mentioned you know,
14 there's nothing -- that the neighborhood,
15 remaining in the neighborhood is more
16 important sometimes than being onsite and
17 that that's something we should
18 potentially take into consideration.

19 Could you speak a little more to
20 that issue and why, perhaps onsite isn't
21 as valuable as maybe some are suggesting?

22 MS. STURTEVANT: And I think
23 onsite is valuable, don't get me wrong.

24 I think when you look at the
25 research, the theory of having units in

Proceedings

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2 the same building, say, the theory is
3 that, when you have a mix of incomes
4 living in the same building, you have the
5 potential of getting to know your
6 neighbors, to understanding that your
7 children may have a chance to play with
8 children they may not otherwise have a
9 chance to meet or you have a chance to see
10 people operating their day-to-day lives
11 differently, that's the theory. The
12 research doesn't bear it out quite the
13 same way the research bears out the
14 benefits of being in a neighborhood that
15 has access to amenities.

16 So I'm not saying it's not true
17 it's just that when we look at what we
18 know about what matters for where housing
19 is being in a place that's safe, being in
20 a place that has access to transit, to
21 good schools, to things like community
22 centers, and parks and health services,
23 those are the things that have been shown
24 to make a difference in people's lives
25 when you look at the research that's been

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done to date.

COMMR. ORTIZ: And when you look at sort of the trade-offs of offsite versus onsite, do you often find in your research, you tend to get more units offsite than onsite? Is that -- can we assume that or no?

MS. STURTEVANT: I think it depends, right? So you imagine where's offsite, right? You can imagine that land costs may be very similar if your offsite is very close by, which I think is, again, from the research, is sort of the ideal, right? To remain in the neighborhood.

That said, in a place like -- I'm thinking of a place like Tysons Corner, Virginia, I'm not sure if you're familiar, but the allow an offsite option in adjacent neighborhood -- adjacent areas within the same neighborhood where the construction is lower density. It's four or five stories, instead of 15 or 20 stories, and when you do that, the cost of construction is less. And so they are

Proceedings

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2 able, under their offsite option, to
3 generate a greater number of units than
4 had they requested onsite.

5 COMMR. ORTIZ: Thank you.

6 THE CHAIRPERSON: Any other
7 questions for Ms. Sturtevant?

8 Ms. De La Uz.

9 COMMR. DE LA UZ: Thank you.
10 It's really helpful to have the
11 perspective of someone who is familiar
12 with the programs nationally.

13 I'm just wondering, are any of
14 the mandatory programs across the country
15 tied to affordable senior housing?
16 Because we've heard, obviously, and I
17 think, you know, everybody in the room
18 agrees that it would be great to have
19 permanently affordable senior housing but
20 right now that's only available through
21 our voluntary or the proposed mandatory
22 program.

23 MS. STURTEVANT: That's a good
24 question, and I don't know. I don't
25 know -- I can't think off the top of my

Proceedings

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2 head of programs that have gone beyond
3 targeting incomes to targeting household
4 types beyond requiring units of certain
5 sizes which would be towards families. So
6 I'm happy to look into it, but I don't
7 know the answer.

8 THE CHAIRPERSON: Any other
9 questions?

10 (No response.)

11 THE CHAIRPERSON: Thank you,
12 Ms. Sturtevant.

13 MS. STURTEVANT: Thank you.

14 THE CHAIRPERSON: The next
15 speaker is Carol Lamberg, and then we're
16 going to switch to those opposed.

17 The next five speakers after
18 Ms. Lamberg are Humberto Martinez, Rachel
19 Cantizano, Josette Amato, Nancy Torres,
20 and Kaylar Rivera.

21 MS. LAMBERG: Hi. I'm Carol
22 Lamberg, and thanks for the opportunity.
23 And I hope the people who are opposed
24 after hearing all of this great testimony
25 might change their minds.

Proceedings

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2 I'm here to support Zoning for
3 Quality and Affordability and Mandatory
4 Inclusionary, and I'm going to skip the
5 very good part that will be in the record
6 from the New York Housing Conference
7 outlining the crisis that we all face
8 today in affordable housing with hundreds
9 of thousands of applications for each
10 20 units of affordable housing and
11 escalating costs. Construction costs,
12 too, it's not just land costs.
13 Construction costs are higher than ever.
14 I tell people that it takes maybe six
15 months to 30 years to get any housing
16 built, and I think that these proposals
17 would minimize a lot of these steps.

18 The New York Housing Conference
19 is a broad coalition, if anyone was at the
20 luncheon last week with about 1400 people
21 who support affordable housing, including
22 non-profit, for profit professionals and
23 advocates.

24 For zoning quality, the envelope
25 changes and setback coverage requirements

Proceedings

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2 make it easier to build housing,
3 especially affordable and senior housing.
4 A lot of the sites that we can get are
5 just very challenging to figure the
6 housing on and if we had had some of those
7 abilities as-of-right, it could have saved
8 excruciating steps to make changes to
9 allow housing to be built on a site.

10 It also helps the efficient use
11 of sites, making it easier to use modern
12 construction techniques like block and
13 plank and better ground floor for retail
14 will be achieved by raising the height
15 only five feet, and the pictures I've
16 shown are very dramatic and they improve
17 the quality. This is better for
18 communities in terms of quality and
19 variety of retail.

20 Eliminating parking requirements
21 for affordable and senior housing in
22 transit zones will reduce development
23 costs. We have a very nice handout, which
24 demonstrates some of the numbers. I know
25 parking is very popular in all the

Proceedings

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2 neighborhoods and people love their cars
3 and want to keep them, but in this time of
4 housing crisis, it just should not be a
5 priority. Developers have had to take,
6 and I've done it for senior housing, to
7 try to take lots of steps to reduce
8 parking where, say, a sponsor wanted to
9 have a greenhouse or something more useful
10 to them, and it added months and months
11 and months to the process and has not
12 always been successful.

13 The new proposal does not make
14 it impossible to add parking, it just
15 removes the requirement, and allows
16 flexibility. Residents of affordable
17 housing and transit zones own fewer cars,
18 as Bobbie Sackman pointed out so
19 eloquently.

20 In summation, common sense
21 zoning improvements can unlock sites for
22 affordable housing and save public
23 subsidy, and I just read on my iPhone that
24 the new budget doesn't include any
25 increased Section 8 vouchers other than

Proceedings

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2 for veterans. And people who oppose these
3 improvements, and the rest of us should
4 just send bus loads of people to
5 Washington because having Section 8 for
6 everybody would certainly allow us much
7 more flexibility in reaching the very
8 lowest income groups.

9 Turning to mandatory improved
10 inclusionary housing, it's a creative
11 solution that takes advantage of the
12 booming real estate market and puts it to
13 use to provide needed affordable housing
14 for low- and moderate-income New Yorkers,
15 all of whom are very much in need of
16 affordable housing.

17 THE CHAIRPERSON: Thank you.

18 MS. LAMBERG: It improves
19 options, it does all kinds of things, I'm
20 all for it.

21 THE CHAIRPERSON: Thank you,
22 Ms. Lamberg.

23 Any questions for Ms. Lamberg?

24 Thank you very much.

25 Okay, now switching to those

Proceedings

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2 opposed, Humberto Martinez?

3 Welcome Mr. Martinez.

4 MR. MARTINEZ: Good afternoon,
5 Commissioners. My name is Humberto
6 Martinez, and I am a project manager at
7 the Cypress Hills Local Development
8 Corporation. We're a non-profit
9 organization located in the Cypress Hills
10 section of East New York, Brooklyn. We
11 offer many services to the community,
12 including development of affordable
13 housing.

14 Cypress Hills, LDC are proud
15 members of the Coalition for Community
16 Advancement, Progress for East New York
17 and Cypress Hills, where our coalition is
18 comprised of East New York, Cypress small
19 business owners, community-based
20 organizations, clergy members and
21 residents.

22 In addition to the two citywide
23 proposals being discussed today, East New
24 York is undergoing the public review
25 process for a third neighborhood specific

Proceedings

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2 land-use action known as the East New York
3 Rezoning.

4 The Department of City Planning
5 is proposing density increases of a
6 188 percent on Fulton Street and between
7 260 and 620 percent along Atlantic Avenue,
8 including use changes for manufacturing to
9 commercial and residential. Under
10 mandatory inclusionary housing, MIH,
11 Option 1 of 25 percent of residential
12 floor area targeted at an average of
13 60 percent AMI or \$50,000 for a family of
14 four would take effect in East New York.
15 We feel that 60 percent AMI or 50,000 for
16 a family of four is too high for the
17 community, given that the current incomes
18 in East New York, Cypress Hills area are
19 at about 40 percent AMI or about 34,000
20 for a family of four. Furthermore,
21 40 percent of our families within the
22 rezoned area earn less than \$25,000 a
23 year, and 26 percent of the families in
24 the rezoned area earn less than 15,000.

25 According to the East New York

Proceedings

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2 Draft Environmental Impact Statement, MIH
3 Option 1 would require developers to set
4 aside 15 percent of the MIH units at or
5 below the current income -- neighborhood
6 income level of 40 percent AMI or \$34,000
7 a year, but given that the community's
8 great need of affordable housing, the
9 proposal wouldn't produce enough units at
10 where the need is the greatest. For
11 example, under the MIH proposal, a
12 hundred-unit building in East New York
13 would only produce three units at the AMI
14 that is reflective of the community -- of
15 the incomes in the community.

16 As the first neighborhood in
17 which MIH would take into effect, we're
18 asking DCP and the City to establish the
19 precise amount of housing that will be
20 available at the local AMI of \$34 000, and
21 demand that the City develop on
22 alternative lower option that specifies a
23 precise income breakdown that is
24 reflective of the income in the community,
25 and not just an average.

Proceedings

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2 In closing, a lower alternative
3 MIH option would create a firmer
4 foundation for the East New York rezoning
5 by guaranteeing a larger share of
6 apartments that would be permanently
7 affordable at income levels reflective of
8 the current community, unlike
9 HPD-subsidized units, which may result in
10 fewer units than the City currently
11 expects and the affordability of which
12 will expire in time.

13 Thank you.

14 THE CHAIRPERSON: Thank you very
15 much.

16 Any questions?

17 (No response.)

18 THE CHAIRPERSON: Thank you.

19 The next speaker is Rachel
20 Contizano. Ms. Caontizano?

21 PASTOR JAMES: She's not here.
22 She left.

23 THE CHAIRPERSON: You can speak
24 once but you can't speak twice, you
25 understand that?

1 Proceedings

2 PASTOR JAMES: Yes.

3 THE CHAIRPERSON: Who are you?

4 Your name?

5 PASTOR JAMES: My name is Pastor
6 James Osacafeah (phonetic).

7 THE CHAIRPERSON: I'm sorry?

8 PASTOR JAMES: Pastor James
9 Osacafeah (phonetic) or Reverend James
10 Osacafeah, yeah. I come from Ghana. So
11 if you can't pronounce my last name, just
12 call me Pastor James.

13 THE CHAIRPERSON: You got it.

14 PASTOR JAMES: I stand here
15 representing Greater New York and RAFA for
16 Real Affordable For All Coalition.
17 Whatever I wanted to say has been said, a
18 lot of pros and cons have been said, and I
19 don't need to belabor the point that we
20 need to revisit this whole thing about
21 affordability.

22 But before I take my seat, I
23 want to read two paragraphs of the letter
24 that we have sent to de Blasio, the Mayor,
25 "As a diverse group of faith leaders,

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2 today we stand with the Real Affordable --
3 Affordability For All Coalition, the
4 community boards and borough presidents
5 who have all called for true or - truly
6 affordable housing in the Mandatory
7 Inclusionary Housing Plan. We are calling
8 for an affordable housing policy that
9 shows that workers are hired from our
10 local communities and are paid just wages
11 and benefits. We are calling for a better
12 plan or no plan at all.

13 "We stand united in our
14 conviction that we must use all our
15 creative powers to find ways to assure
16 that development benefits all New Yorkers,
17 but especially those most in need."

18 Now hear this, for those of us
19 from Abrahamic faith traditions, we look
20 to the Prophet Amos, Chapter 5, verse
21 number 11, and we make the decision, "You
22 trampled the poor, stealing their grain
23 through taxes and unfair rent; therefore,
24 though you build beautiful stone houses,
25 you will never live in them."

Proceedings

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2 Our blessings and prayers are
3 with you and your Administration as you
4 find a path forward that includes truly
5 affordable housing for our communities,
6 and our city.

7 On this note, I want to plead
8 the indulgence of the Commissioners and
9 all those of you who are sat here, stood
10 here, your patience, your due diligence in
11 making sure that all of us are talking
12 about one thing, though we are coming from
13 different perspectives. And as a
14 Ghanaian, there's a symbol that we talk
15 about. There are two crocodiles or
16 alligators. They have two heads, eight
17 legs, two tails, but one stomach. In
18 other words, they don't have to fight
19 trying to eat food, because at the end of
20 the day, the food goes to one stomach.

21 On this note, make sure that the
22 people that we are serving get their due
23 share. God bless you.

24 THE CHAIRPERSON: Thank you.
25 Thank you very much. And thank you for

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your patience.

PASTOR JAMES: We have a letter here signed by 66 pastors and clergy members and I'm going to leave it with --

THE CHAIRPERSON: Hand it in to the secretary. Thank you very much.

The next speaker is Josette Amato.

MS. AMATO: Good afternoon Commissioner. My name is Josette Amato, and I'm the Executive Director of the West End Preservation Society. WEPS believes that growth and affordable housing is necessary for New York City to remain viable in the 21st Century. The goals of both MIH and ZQA are admirable. Who could be opposed to affordable housing or senior housing?

This may be well-intentioned, but the approach is applied too broadly for our diverse neighborhoods with different needs. It gives away much to developers with the promise of affordable housing units that might turn out to be

Proceedings

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2 not so affordable. We believe this will
3 negatively impact existing contextual
4 districts and our existing affordable
5 housing stock, and therefore, we cannot
6 support these proposals as written.

7 ZQA states these changes would
8 provide flexibility to existing
9 regulations to facilitate development and
10 improve quality, yet there is no proven
11 correlation between the two. Increasing a
12 building envelope only guarantees a bigger
13 building, not necessarily a better one.

14 Changes to height restrictions
15 is not a throw-away for us. It is a
16 tremendous concern. For smaller lots it
17 opens the door to the destruction of
18 smaller buildings which could result in
19 the loss of affordable units. Couple that
20 with the elimination of height
21 restrictions for narrow streets, and
22 you've facilitated sliver buildings across
23 the City. Should these building be
24 comprised of 11 to 25 units, there will be
25 no gain of affordable units within these

Proceedings

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2 sites.

3 We are especially concerned with
4 the consequences in historic districts.
5 By increasing carefully agreed upon
6 limits, streetscapes will be forever
7 changed, eliminating years of dedicated
8 work within those communities.

9 Rooftop and rear-yard additions
10 will become standard at the exact time
11 rear-yard setbacks regulations will be
12 eliminated. While this commission
13 acknowledges all changes in historic
14 districts will remain under the watchful
15 eye of the Landmarks Preservation
16 Commission, there is no acknowledgement of
17 the reality the proposal will unduly
18 burden the smallest of agencies.

19 In our neighborhoods on the
20 Upper West Side, rent-regulated units
21 still have a good presence in housing
22 stock. Elimination of those units in
23 order to create anew, would be devastating
24 to our residents. It is unlikely our
25 neighborhoods would see any substantial

Proceedings

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2 affordable housing created under this
3 proposal.

4 MIH allows for units to be
5 created offsite, which would still be
6 unrealistic in our area, or payment in
7 lieu. This places the burden of managing
8 the fund and creating newly affordable
9 housing back on the City at a time when
10 New York City continues to have difficulty
11 maintaining the housing it already owns
12 and operates.

13 We urge you to make no changes
14 to the fabric of historic and contextual
15 districts across the City and that more
16 changes are needed, many have been heard
17 here today, to guarantee the results the
18 proposals seek to enact. We do hope that
19 you will listen to the changes,
20 incorporate the changes, and we thank you
21 very much for your time in considering our
22 comments.

23 THE VICE CHAIRMAN: Thank you
24 Ms. Amato.

25 Question? Let's see if there's

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any questions. Questions?

(No response.)

THE VICE CHAIRMAN: Thank you.

Nancy Torres, who will be followed by Kaylar Rivera.

MS. TORRES: Hello. Hi, my name is Nancy Torres. I'm a tenant organizer at the Urban Home Study Assistance Board, a housing organization, as well as a member of the RAFA Coalition, Real Affordability For All, working directly with the East Harlem community.

Sadly, or perhaps fittingly, we are here today at this Museum of the American Indian to speak against a plan that would cost once again, the mass displacement of people of color across the City. The Mayor's plan is planned gentrification. It will not create affordable housing, it will not create good jobs, but it will ensure residents to lose their communities and their homes.

De Blasio's plans include a mandatory inclusionary housing where

Proceedings

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2 income levels are too high. Like, as
3 everyone has stated, the numbers; based on
4 60 percent of citywide AMI, that's just
5 over 43,000, only 25 percent of the
6 housing will be at this level and the rest
7 will be far above it.

8 Like many of the residents of El
9 Barrio earn 23,000 or less a year, income
10 levels that will exclude them from
11 de Blasio's affordable housing. Too many
12 times low-income residents are displaced
13 and unheard, but today we are presenting.
14 We are -- we call on Mayor de Blasio,
15 listen to the people and revise your
16 housing plan with the jobs and
17 affordability mechanism of our coalition
18 and so neighborhoods can actually have
19 real affordability for all.

20 Thank you for your time.

21 (Applause.)

22 THE CHAIRPERSON: Thank you very
23 much.

24 Any questions for Ms. Torres?

25 (No response.)

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THE CHAIRPERSON: Thank you.

Next speaker is Kaylar Rivera.

MS. RIVERA: Good afternoon,
City Planning Commissioners and my fellow
advocates. My name is Kaylar Rivera, and
I am a community organizer here on behalf
of the Coalition for Community Advancement
out of East New York and Cypress Hills,
Brooklyn. You have all heard my partner,
Humberto Martinez, speak about the East
New York rezoning in comparison to the
Mayor's plan for mandatory inclusionary
housing. I'm here to talk to you about
how the Mayor's plan is lacking
tremendously.

Throughout the years, we have
seen gentrification in Williamsburg,
Bushwick, Bed-Stuy, and my home, Harlem
covered up by urban renewal projects.
These same neighborhoods have seen
tremendous loss in its affordable housing
market and a rapid change in neighborhood
character. Like I said, as it stands,
Mayor DE Blasio's plan to spur affordable

Proceedings

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2 housing development in the City of New
3 York is lacking tremendously.

4 The DEIS for the
5 Administration's MIH projects 3,447
6 affordable housing units will be created
7 in conjunction with other subsidies. As
8 outlined in Comptroller Stringer's
9 response to the MIH, in actuality, only
10 half of these units have community
11 preference. Therefore, that's really
12 1,724 affordable housing units available
13 for current residents. Most low-income
14 and working-class New Yorkers cannot
15 afford to live in the City. Trust me, I
16 know.

17 As the cost of living has risen,
18 the income index has not. Nearly a third
19 of New Yorkers fall below 40 percent AMI,
20 and more than 1.1 million households that
21 are rent burdened, roughly 83 percent or
22 938,000 are below 60 percent of AMI. In
23 many communities, the income levels
24 required in the City's MIH proposal would
25 further gentrify rather than to help

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2 provide affordable housing that our
3 residents need. The City's MIH proposal
4 primarily targets the 60 percent area,
5 meeting an income that are already served
6 by our current housing programs, leaving
7 out the more than 40 percent of new
8 Yorkers whose incomes are below these
9 levels.

10 Commissioner Vicki Been did not
11 speak to that this morning. There will --
12 this will not spur development of housing
13 for middle- and low-income New Yorkers.
14 MIH will in fact cause a bigger financial
15 rift between our communities, displacing
16 thousands of New Yorkers from their homes.
17 What we're calling for is for the City to
18 revise its mandatory inclusionary housing
19 proposal, add additional options with
20 deeper affordability levels that truly
21 meet the full range of incomes in
22 neighborhoods across this great city. We
23 want to add deeper affordability options,
24 30 percent affordable housing at an
25 average 30 percent AMI.

Proceedings

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2 We want to eliminate the current
3 gentrification option, which will set
4 aside 30 percent of units at a 120 percent
5 AMI. Furthermore, we'd like to require
6 that all mandatory inclusionary housing
7 options, regardless of average income
8 level, set aside a band of 15 percent of
9 its units at 30 percent AMI levels.

10 This plan is supposed to spur
11 development for our lowest and middle New
12 Yorkers, not moderate to high income.

13 We also urge the City of New
14 York to increase the number of MIH options
15 to five, to serve the range of diverse
16 neighborhood needs.

17 New Yorkers need the City's MIH
18 proposal to be a true catalyst for
19 affordable housing. I'll say that again
20 just in case the Commissioners did not
21 hear me: New Yorkers need the City's MIH
22 proposal to be a true catalyst for
23 affordable housing. We cannot continue to
24 implement policies that further subjugate
25 our communities, especially our

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communities of color.

It is our mission as community members and advocates to stem the tide of gentrification. We urge the City of New York to implement strong and sustainable policies to assist in the growth of affordable housing.

Thank you.

(Applause.)

THE CHAIRPERSON: Thank you very much, Ms. Rivera.

Questions for Ms. Rivera?

(No response.)

THE CHAIRPERSON: Thank you.

Okay, now we're going to switch back to those in favor. The next five speakers are Sydelle Knepper, Alex Schwartz, Rachel Meltzer, Adam Weinstein, and Lisa Gomez.

And speaking for Sydelle Knepper, I believe, is her daughter.

Welcome.

MS. S. KNEPPER: Good afternoon.
Thank you so much to the Chairman, the

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2 Vice Chairman, the Commissioners.

3 My name is Stephanie Knepper,
4 I'm counsel and Senior Vice President at
5 SKA Marin, and I am speaking on behalf of
6 Sydelle Knepper who, unfortunately, is on
7 another panel this morning.

8 (Reading) "My name is Sydelle
9 Knepper, and I am founder and CEO of SKA
10 Marin, an affordable housing firm since
11 1982, that develops, owns and manages
12 affordable housing, with a specialty in
13 the creation of quality senior housing
14 communities. I am also co-chair of the
15 New York Housing Conference, and pleased
16 to confirm through the testimony of my
17 co-chair, Carol Lamberg, support of the
18 City's proposals for ZQA, and mandatory
19 inclusionary housing.

20 "I would like to focus my
21 testimony today on senior housing, and the
22 critical shortage that the City of New
23 York faces in coming to terms with its
24 growing elderly population. While SKA
25 Marin has been involved in the creation of

Proceedings

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2 several thousand units of senior housing,
3 there is still a growing need in every
4 community.

5 "Today, seniors are living
6 longer. They are unlikely to move to
7 other localities when they retire. Their
8 children and families may not live near
9 them, and for many, Social security and
10 pensions do not cover the Increase in
11 living expense. Aging in place is what
12 many seniors would like to do; they would
13 like to stay in their community where
14 their friends, social networks, houses of
15 worship and familiar landmarks exist.
16 Yet, the affordable housing that should be
17 there for them when they need a more
18 secure environment, a handicapped
19 accessible apartment or easy access to
20 services is not readily available.

21 "High land and construction
22 pricing, and a shortage of project-based
23 Section 8 vouchers are problems that are
24 not easily solved. However, when we
25 identify potential sites, current zoning

Proceedings

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2 requirements mandating a certain amount of
3 parking means that we cannot build more
4 apartments or more open space or more
5 community facility space that house needed
6 services.

7 "Parking spaces are expensive,
8 and in our projects, in SKA's projects,
9 are not widely used by residents. In the
10 case of a building having a limited number
11 of parking spaces, this still impacts
12 cost, open space and other amenities.

13 "I would like to present an
14 example of the impact of current zoning.
15 SKA completed Riverway Apartments, 114
16 plus 1, one-bedroom apartments for seniors
17 in Brownsville, Brooklyn. The building
18 has some wonderful amenities, including a
19 10,000 square foot senior center run by
20 Catholic Charities that converts to a
21 daily after-school and homework run by our
22 partner, The Calvery Church of God.
23 Riverway Apartments is shaped liked a U,
24 and includes a beautiful secure courtyard
25 garden with a fountain. Due to the 17

Proceedings

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2 parking spaces that the building was
3 required to have and which is only used by
4 by staff and senior center employees, SKA
5 had to cut the size of the outdoor space.

6 "To disguise the parking and yet
7 still allow it to be used, part of the
8 garden has pavers with grass in-fill that
9 can still be parked on. This portion of
10 our garden space cost more and is not a
11 natural lawn. Other restrictions included
12 a zoning height requirement that mandated
13 the development of only six-and-a-half
14 floors, though there is a high-rise
15 complex just a block away from Riverway
16 Apartments.

17 "To place this restriction in
18 its context, Riverway Apartments received
19 over 3,000 applications for 114
20 apartments.

21 "I understand that the idea of
22 building senior housing without parking
23 seems at first glance to compromise those
24 seniors who still own cars and drive or
25 have family members who visit and need

Proceedings

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2 parking. However, most senior buildings
3 do offer through community facility spaces
4 that house service providers and programs
5 access to transportation for shopping and
6 other needs.

7 "Supportive services, for
8 example, such as meals, recreation,
9 referral for benefits and healthcare
10 counseling is available on sight. At
11 SKA's senior housing, our security system
12 offers immediate referral to EMS, so
13 residents do not have to worry about using
14 their own transportation to get to
15 emergency health care.

16 "We have never had a complaint
17 from any family member of a resident that
18 they cannot park on premises. What we
19 always do hear are requests for
20 applications for our housing. We are
21 building 203 units of senior housing in
22 East Harlem right now, and though the
23 project is not expected to rent up until
24 2017, we receive inquiries daily."

25 We support --

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THE CHAIRPERSON: One more sentence.

MS. S. KNEPPER: -- ZQA.

THE CHAIRPERSON: Thank you. That's a a good sentence.

Questions for Ms. Knepper?

(No response.)

THE CHAIRPERSON: Thank you very much.

Next speaker is Alex Schwartz.

MR. SCHWARTZ: Thank you very much for this opportunity to testify the mandatory inclusionary zoning. I'm Alex Schwartz. I am a professor of Urban Policy at the New School, and I'm the author of a text book, Urban Policy -- Housing Policy in the United States, in the third edition.

I'm just going to speak briefly, following up on some of the comments that Ms. Sturtevant made a few minutes ago, I'm actually drawing from some of her work. I want to say first that the Mandatory Inclusionary Zoning Plan is consistent

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2 with best practices in the United States.
3 There are about almost 500 inclusionary
4 zoning plans currently in effect in this
5 country, across the nation. Most are
6 suburban but there are a number of major
7 cities besides New York that have adopted
8 inclusionary zoning and inclusionary
9 housing.

10 Before I talk about some of the
11 key characteristics, I think it's
12 important to emphasize that it's not a
13 panacea. It's not by any means the only
14 or necessarily the most important means of
15 providing affordable housing. It's also
16 important to provide direct subsidies. In
17 particular, inclusionary zoning is a
18 mechanism to leverage the private sector
19 to produce some portion of a City's or a
20 town's affordable housing needs. And
21 there is a trade-off between the number of
22 inclusionary units, affordable units that
23 can be produced versus the affordability
24 of those units. And it's rare -- rare at
25 all if -- to see units that are truly

Proceedings

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2 affordable for the lowest income
3 households. It just doesn't generate that
4 level of subsidy.

5 But, I would add that by
6 allowing for the production of affordable
7 units for people earning -- you know, 40,
8 50, 60 percent or higher median income, it
9 enables the City to concentrate its
10 subsidies for people earning less. And I
11 would point out that the de Blasio plan
12 involves a very large increase in direct
13 subsidy and capital expenditures on
14 affordable housing that we did not see
15 before.

16 So I think it's important to
17 point out that this is not the only
18 element of the Mayor's affordable housing
19 plan, but it is an important one.

20 A couple other points while the
21 City's Mandatory Inclusionary Zoning Plan
22 is consistent with other urban
23 inclusionary zoning plans, it differs in a
24 couple of key respects. One is that the
25 percentage of units or designated for

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2 affordability is significantly larger and
3 considerably higher than what we see in
4 other cities. In most places it's 10 to
5 20 percent of the units that are
6 affordable. In New York City, it's 25 to
7 30 percent. That's a very large
8 difference. Also, New York City, as far
9 as I know, is the only city where all the
10 inclusionary units or affordable units,
11 are rental and not owner occupied, and the
12 affordability standards for owner
13 occupancy in other cities is considerably
14 higher.

15 So by focusing on rental
16 housing, you are making the housing
17 overall more affordable, and the income
18 standards in New York are broadly
19 consistent with other cities, especially
20 when you average out the owner occupied
21 and the rental units. I think that's an
22 important point.

23 Finally, the concern about
24 gentrification and inflation. There are
25 no studies that I know of that link

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2 inclusionary zoning to displacement to
3 inflationary price pressures. I think the
4 point is well taken, however, and it is a
5 concern. I applaud the Mayor's decision
6 to increase the amount of legal services
7 that we provided residents in the
8 neighborhoods throughout the City,
9 especially those targeted for inclusionary
10 zoning, but I would add that many
11 neighborhoods that are not targeted for
12 inclusionary zoning that currently are
13 seeing lots price pressures on rental
14 housing, that currently are experiencing
15 harassment on the part of landlords are
16 not subject to inclusionary zoning. It's
17 simply market pressures, because we have
18 population growth and increased demands
19 for housing, and for that reason, I don't
20 think it's reasonable to think that
21 inclusionary zoning alone is responsible
22 for that.

23 Thank you very much.

24 THE CHAIRPERSON: Thank
25 you, Mr. Schwartz.

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Questions?

Ms. De La Uz.

COMMR. DE LA UZ: Mr. Schwartz,

thank you very much for being here. I appreciate it. Since you raised the point of displacement and the fact that you don't believe -- that there's no research that supports that mandatory inclusionary programs actually contribute towards displacement. I'm wondering, considering it is a legitimate concern that exists in many, many communities throughout the City because of the market pressures that exist and because of your perspective and research and knowledge in this, are there displacement tools that the City of New York should be considering using that we are not currently using?

Anti-displacement tools, obviously.

MR. SCHWARTZ: A lot of it will have to do with the rental -- renter's rights under rental stabilization and education outreach legal services.

I'm not sure about how to help

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2 people who are living in unregulated
3 housing. That is a serious concern,
4 although, again, I'm not sure, especially
5 in East New York to what extent that will
6 take place, but I think that that is a
7 concern, but certainly, for people in
8 rent-regulated housing and rent-stabilized
9 housing, there are various tools in
10 education outreach and legal services.

11 COMMR. DE LA UZ: Thank you.

12 THE CHAIRPERSON: Any other
13 questions for Mr. Schwartz?

14 (No response.)

15 THE CHAIRPERSON: Thank you.

16 MR. SCHWARTZ: Thank you.

17 THE CHAIRPERSON: The next
18 speaker is Rachel Meltzer, also from the
19 New School.

20 MS. MELTZER: Good afternoon.
21 Thank you for the opportunity to speak
22 today. My name is Rachel Meltzer, and I
23 am also a Professor of Urban Policy at the
24 New School, right down the hall from Alex,
25 and I conducted research on inclusionary

Proceedings

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2 housing programs across the U.S., and it's
3 off this research and experience that I'm
4 going to base my comments today.

5 Today I'm going to focus on one
6 particular aspect of inclusionary housing,
7 its flexibility. If done well, it should
8 adjust to the market conditions across
9 space and over time. And I think the
10 proposal put forth by City Planning really
11 achieves this in many ways. The flexible
12 design acknowledges that each site and
13 development project is unique, but at the
14 same time, it provides guidelines on how
15 to ensure affordable housing production is
16 sensitive to the community's need. This
17 is particularly important for a city as
18 diverse and dynamic as New York.

19 My own research provides
20 empirical evidence to support this claim.
21 Inclusionary housing programs are more
22 effective when they allow for variation
23 based on neighborhood conditions, and/or
24 site characteristics, like smaller
25 buildings, when there are buy-out options

Proceedings

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2 and offsite development options for
3 example, Boston, which de facto operates
4 like and mandatory program, provides few
5 standard cost offsets, and very high in
6 lieu payment schedules. San Francisco on
7 the other hand -- well, San Francisco also
8 has IH program that actually has been
9 around for about the same time as Boston
10 which makes it comparable along those
11 dimensions but incorporates a wide range
12 of cost offsets, including density
13 bonuses. And not surprisingly, San
14 Francisco has produced almost twice the
15 number of annualized affordable housing
16 units compared to Boston.

17 Inclusionary housing programs
18 can be tailored to both lower market
19 conditions and policy goals. For example,
20 if in one neighborhood the goal is to
21 provide affordable housing to poorer
22 households that otherwise might not be
23 able to access housing in that area, the
24 affordability income thresholds can be set
25 lower in that neighborhood. If in another

Proceedings

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2 neighborhood in the same city, the goal is
3 to maximize the number of units perhaps
4 without as much regard to the depth of
5 affordability, then affordability income
6 thresholds can be set higher there.
7 Perhaps with larger set-aside shares.

8 There is an obvious tradeoff
9 between affordability depth or breadth and
10 financial feasibility. More extensive
11 affordability means, holding all else
12 constant, lower project income and either
13 less profit for the builder/the developer
14 or higher market-rate prices or rents to
15 cross-subsidize those affordable units.

16 In this case, I would say that
17 New York City's tight housing market is
18 actually an opportunity. Tighter housing
19 markets can be central to the success of
20 an inclusionary housing program. Indeed,
21 the affordable units are being subsidized
22 by the market-rate ones, and the more one
23 can charge for the market-rate ones, which
24 tends to happen in tighter markets, the
25 more room there is to subsidize the

Proceedings

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2 below-market ones either in terms of the
3 number of units or the depth of
4 affordability.

5 No other municipality that I
6 have studied requires the same breadth and
7 depth of affordability that's been
8 proposed by New York City. However, this
9 calibration of imposing affordability
10 requirements while still leaving the
11 project financial feasible is a very
12 difficult one. A successful Mandatory
13 Inclusionary Housing Program finds a
14 balance between imposing strong enough
15 requirements that stand a chance of
16 actually producing meaningful amounts of
17 affordable housing while still allowing
18 the project to pencil out the developer.

19 The reality is is that in this
20 day and age the affordable housing cannot
21 get built without the developers buy-in.

22 In closing, I have the utmost
23 faith in inclusionary housing programs. I
24 think they are a very important
25 compliment, as Alex discussed, to other

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2 affordable housing subsidies and efforts.
3 I think New York City is very well
4 situated to implement a mandatory program
5 and will benefit from such a policy. The
6 market is strong enough to financially
7 support and inclusionary housing
8 infrastructure and the housing and
9 land-use agencies, I think, are
10 sophisticated enough to handle the
11 complexities of such a policies. I think
12 a lot of places overlook that part of
13 inclusionary housing.

14 It is crucial that the
15 regulation incorporates flexible
16 applications and opportunities for both
17 deal-specific and cycle-specific
18 adjustments and finds an effective balance
19 between meaningful affordable housing
20 production, and financial feasibility.

21 Thank you.

22 THE CHAIRPERSON: Perfectly
23 timed. Thank you, professor. Thank you,
24 professor.

25 Ms. De La Uz.

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COMMR. DE LA UZ: Hi, Rachel.

How are you? I'm glad that you're here and sharing your research.

I'm just wondering, since you touched on the issue of hardship, and how obviously in this text right now there is language about a review process that involves the BSA. I'm wondering if you have any thoughts about that specific piece of it, and how your research across -- I know I'm throwing something at you that maybe you didn't expect -- and in particular, any information that you may have about other municipalities and how they handle weighing that issue, because I think a lot of communities are concerned that that could potentially be a very significant loophole that would undermine MIH.

MS. MELTZER: Yeah. And I don't have a answer to tell you this is a clear way do it that's not going to bring up questions, and I do think that that's the challenge.

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All I can say is there needs to be a process to do that. I don't know if I can tell you what the best one looks like, but I think the places that I've seen that have trouble actually producing the housing, where it gets log-jammed, and you just don't see units are ones that don't have processes to recognize that every deal is different and every circumstance is different.

Now, that doesn't mean that you go the BSA for every -- for every circumstance and that's why you have to find this balance between having guidelines that are kind of standardized enough, but yet have these tierings, which I think your policy rightly starts to do. And I think -- so finding finding that balance. I agree. I think that's a place where it could get slippery.

I think at least having -- I think having information transparent and out there and making it known, kind of from the get-go what the processes are to

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2 present those hardships and making
3 transparent those that, kind of -- you
4 know, can move through versus -- again, in
5 talking to places, it's when things get
6 murky and it's not clear why one project
7 kind of was subject and others weren't.
8 So trying to keep those standards as like
9 regimented as possible is helpful.

10 But I will say, confidently,
11 that you need some process where builders,
12 where developers can come to the City and
13 say, Look, I want to figure out a way to
14 do this but I can't do it under these
15 constraints right now. And I think -- I
16 would say I think inclusionary zoning is
17 very powerful because I think it gives the
18 City really a point of leverage that --
19 you know, through zoning and through the
20 permitting process that gives them a way
21 to -- you know, not strong-arm, but, you
22 know, forcefully negotiate with the
23 private sector, and get these affordable
24 units, you know, from them. So I would
25 view these appeals processes and

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2 negotiating process, again, as another way
3 to do that, perhaps more on a case by
4 case, but I agree that's a tough one. But
5 I do think you need to figure out a way to
6 have a process.

7 THE CHAIRPERSON: Ms. Ortiz and
8 then Ms. Levin.

9 COMMR. ORTIZ: Hi. Thank you
10 for your testimony. You brought up
11 something that got me thinking a little
12 bit. So, you know, the payment-in-lieu
13 option that -- well, there are two things.
14 You know, the payment-in-lieu option the
15 way it's structured right now would
16 require that the payment be used locally
17 within a certain time frame, and I believe
18 the -- right now, what's on the table is
19 ten years. But then you also mentioned
20 that we have to think about financial
21 feasibility, and in some neighborhoods
22 rents are too low to support development
23 without subsidy, even if we gave them all
24 the FAR in the world.

25 So I guess it's just your best

Proceedings

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2 thinking: Why wouldn't we try to apply
3 revenue generated in these high-rent
4 districts to lower-rent districts to spur
5 the development of housing that otherwise
6 wouldn't be developed in the current
7 market conditions?

8 I guess, you know, my -- the
9 concern that I have for myself as I look
10 at that is, you know, we end up with
11 payment-in-lieu being, you know, generated
12 in high rent districts and be used i
13 high-rent districts; no payment-in-lieu
14 being generated in low-rent districts and,
15 therefore, not being used in lower-rent
16 districts. And, you know, do you have any
17 thoughts how do we make this all work and
18 have an equity across the City?

19 MS. MELTZER: Just so I know
20 what you're asking, are you specifically
21 asking whether it makes sense to take
22 those in-lieu payments and have them be
23 applied more broadly? Is that --

24 COMMR. ORTIZ: Yeah. Or, you
25 know, should we be looking at a shorter

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2 time frame within which they should be
3 used locally, but recognizing we have a
4 crisis now; we've got to build housing
5 now, maybe that time frame should be less?

6 I don't know. I wanted to get
7 your thoughts as someone who thinks about
8 this issue.

9 MS. MELTZER: No. I think
10 that's a good point. I think in cases
11 where they have these in-lieu payments
12 that go into some affordable housing trust
13 or fund, right? I think you have seen
14 cases where maybe the money sits there
15 longer or a lot of places will have it
16 there, and they'll say, okay, if a
17 developer -- if someone needs it, they can
18 apply for it and access it, right? So
19 that could delay the process of accessing
20 it. I think -- I mean, I think the point
21 about having the revenue from these
22 projects be more broadly applied, that
23 makes sense to me. I can't -- off the top
24 of my head, I don't know if I could give
25 you like a parallel scenario where that's

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happening.

I think -- I mean, the in-lieu payment gets tricky too. I think you have to figure out right number is as well right? I mean, you kind of don't necessarily want it low enough that people are using that -- you know, kind of paying in instead of actually building the units where that might make more sense, but you don't want it so high that it is not a.. Possibility in certain circumstances, but -- so I think for right -- kind of reasons of equity, reasons of perhaps even efficiency, right? You could argue, let's take the funds and use them in places where maybe they would be more productive, productively spent. I think that would make sense.

The time frame, theoretically, is a good idea. Realistically, I don't know if I have the answer; I'd be interested to know how to make that happen, just procedurally to say, okay, we have this money; it needs to be spent in

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2 this amount of time, because usually there
3 has to be some vetting process to get that
4 money, I would imagine, to spend it.

5 COMMR. ORTIZ: Thank you.

6 THE CHAIRPERSON: Ms. Levin.

7 COMMR. LEVIN: Yes. Professor
8 Meltzer, I wanted to go back to, you spoke
9 about the importance of flexibility in
10 successful programs and having a range of
11 elements that can be pulled on by
12 individual communities and individual
13 developers. And I guess my question is
14 whether there is such a thing as too much
15 flexibility?

16 I think I put a similar question
17 to Rafael Cestero and answer was, Oh,
18 don't make it too complicated, but we're
19 hearing from constituencies across the
20 City about a variety of ways in which we
21 could provide even more flexibility.

22 Should we be cautious about
23 that?

24 MS. MELTZER: I would say, yes.
25 And, you know, it's easy for me to get up

Proceedings

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2 here and say find that balance between,
3 right, flexible and standardizes, but --
4 and I think that's -- you know, I think
5 places -- as more and more places that
6 adopt IZ, this is what's happening; like,
7 we're just getting a better understanding
8 of works and doesn't work.

9 Yeah. I don't think you want to
10 get too, too flexible, just because it
11 becomes unwieldy in a cert- -- you know,
12 as a program to administrator, it could
13 become unfair, right? Then it start
14 raising questions of just, you know, how
15 equitably it's being applied.

16 COMMR. LEVIN: I see.

17 MS. MELTZER: So that's my
18 comment at the end, about just the
19 administration of an inclusionary program
20 is -- is very challenging and complicated
21 in and of itself, and I think a lot of
22 places overlook that. And I think it can
23 underman- -- undermine, actually, the
24 success of the program itself.

25 Even if on paper, you know,

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2 right? You've covered all your bases, you
3 have to have, you know, kind of the
4 infrastructure in terms of people,
5 guidelines and -- you know, in place to
6 make it run effectively from the City's
7 end, but also so that the developers,
8 right, whether their non-profit, for,
9 actually want to participate in the
10 program.

11 COMM. LEVIN: Right.

12 MS. MELTZER: I mean, I pulled
13 out -- in my work -- I mean, I'm
14 actually -- I'm a big fan of San
15 Francisco's program, I think they do a lot
16 of things, and I think one of the things
17 they actually have done, and I've talked
18 to them about, how over time, is that they
19 really try to work with the development
20 community, is my understanding and they
21 made changes just to the administration of
22 the programs so that it works better in
23 that way, and that's something that stood
24 out to me that I thought was good kind of
25 lessoned learned.

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COMMR. LEVIN: Good. Yeah,
that's something we're going to have to
look into in the follow-up discussions
here.

MS. MELTZER: Right.

COMMR. LEVIN: Because it's
clear that HPD is going to be embarking on
a whole new package of responsibilities
for implementing this if it gets approved,
and we need to be sure that that's all in
good order.

MS. MELTZER: Yeah.

COMMR. LEVIN: Thank you.

THE CHAIRPERSON: Mr. Marin.

COMMR. MARIN: Professor, thank
you for your testimony. Thinking about
payment-in-lieu, in -- you know, our
proposals here indicate that our
payment-in-lieu would be for any buildings
that are between 11 and 25 units. And in
your research what have you seen as
payment-in-lieu for the number of units,
and what have you seen in terms of
payment-in-lieu of subsidy versus that

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payment?

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Because it seems that if you have a payment-in-lieu that is low enough to discourage a developer from building that low-income unit, he will do so. So I'm just trying to figure out if you have come across in your research, again, payment-in-lieu number of units, and what the payment-in-lieu amount is verses the subsidy?

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MS. MELTZER: Let me just make sure I know what you mean by versus subsidy, payment-in-lieu verses the subsidy.

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COMMR. MARIN: So for instance, a two-bedroom unit, let's say, gets 60,000 dollars' worth of subsidy. What would --

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MS. MELTZER: Oh, I see what you're saying.

21

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COMMR. MARIN: There you go, you got it.

23

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MS. MELTZER: Okay. So, I mean, in terms of the number, it's different in ever- -- it's going to be linked to the

Proceedings

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2 market, right? Because it's, you know --
3 I mean, as is the subsidy. So the number
4 is hard for me to say; this is, you know,
5 one number that, you know, has worked per
6 unit?

7 The one thing I'll say about the
8 in-lieu, the payment-in-lieu that I've
9 come across more often than not is that
10 usually municipalities, their strategy
11 actually is to not -- to have that be not
12 the first choice, right? So, I guess
13 that's right, the most diplomatic way to
14 say it. So they're not out there
15 intimidating people to keep them away from
16 the in-lieu payment, but it's like really
17 they use the number. So they -- and they
18 change it all the time.

19 So I was talking to people in
20 like Montgomery County, they, I think,
21 gradually increased that number over time,
22 really with the intent of making it a less
23 appealing option, I think. So I think
24 that's like the more general thing I could
25 say about the in-lieu payment as kind of a

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component of the program.

I don't know in that answers
your question.

COMMR. MARIN: Absolutely.
Thank you.

THE CHAIRPERSON: Any other
questions for Professor Meltzer?

(No response.)

THE CHAIRPERSON: Thank you very
much.

Next speaker is Adam Weinstein
from Phipps Houses.

Welcome, Mr. Weinstein.

MR. WEINSTEIN: Good to see you
all. Thank you, Chairman, Deputy
Chairman -- Vice chairman and
Commissioners. I think my time, as
Professor Meltzer said, it depends on if
things pencil out. I think my role here
is to be the pencil.

(Laughter.)

MR. WEINSTEIN: Phipps Houses is
a not-for-profit, it's important to note
this, a not-for-profit affordable housing

Proceedings

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2 developer, has been so for 110 years. We
3 have developed voluntary inclusionary
4 housing, have used -- have been a frequent
5 user of many of the City's affordable
6 housing programs, many of the federal
7 affordable housing programs. In fact, I
8 think there isn't a program that Phipps
9 Houses hasn't developed under and we are
10 still active developers along with the
11 City's agencies today, with a pipeline of
12 a lot of apartments we hope to build under
13 the Mayor's extremely ambitious and
14 extremely worthwhile Housing New York
15 Program.

16 So this said, I think
17 Commissioner Levin, Efron, De La UZ, and
18 Cantor asked questions earlier that I
19 think I'd like to dig into a little bit
20 deeper here in my testimony.

21 It is important in MIH to
22 remember this is a pro-cyclical market
23 program, and it is impossible for us
24 sitting here today to remember a city in
25 2003 or '4 that was recovering or a city

Proceedings

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2 in down cycles when no inclusionary
3 housing units will be produced. So it is
4 definitionally a break on the system.

5 And that being said, it is also
6 important that it not conflict with the
7 programs of HPD, which are very likely to
8 supply most of the very low, extremely low
9 and low-income housing units the City will
10 produce. I'll say it again, the City's
11 housing department has provided --
12 provides subsidies to such a degree that
13 it exceeds that of the next 50 states, the
14 next 50 municipalities combined to produce
15 affordable housing for households of
16 extremely low, very low and low income.

17 That said for those who are
18 concerned for the MIH levels being
19 improper, I remind everyone these are
20 averages. There is no restrict on
21 doing -- providing units below the
22 average; and furthermore, for those of us
23 who produce affordable housing, there is a
24 donut hole or a reverse donut hole; there
25 is a Dunkin nugget and the Dunkin nugget

Proceedings

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2 is the households between 50 and
3 60 percent of AMI. Why? Because the
4 sources of funds to produce that housing
5 derives from federal sources. It is, in
6 effect, a reverse subsidy from maybe 38 or
7 35 of the other 50 states to New York and
8 other high-cost cities -- high-cost states
9 with -- or states with high-cost cities in
10 the form of low-income housing tax credit.
11 This is a very, very valuable tool, but it
12 disappears at 60 percent of AMI.

13 So to those who would say go
14 lower, I say sure it can -- you can go
15 lower, but the real hard units to produce
16 are a dollar more than 60 percent of AMI
17 up to, probably 90 percent of the area
18 median income. For households at those
19 levels, there is nothing, essentially
20 nothing, and having produced voluntary
21 inclusionary housing for households at 80,
22 I can tell you, there is nothing. There
23 is no subsidy programs. So it all comes
24 out of the taxpayers hands -- out of the
25 taxpayers wallets.

Proceedings

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2 The -- and I would encourage us
3 to not lose sight of the fact, and
4 particularly in places like East New York,
5 where Phipps owns a very large site and
6 would like to do a 100 percent affordable
7 housing project using HPD's programs for
8 60s, 50s, 40s, and 30s. But let's not
9 also forget a household at 30 percent of
10 AMI, forget about debt, forget about
11 borrowing to build that building, that
12 household can't even pay the operating
13 costs to the building. They can't pay for
14 labor to keep it clean and well-tended,
15 which we'd like to do, heat it, and insure
16 it, and then we'd like to do minor repairs
17 after 10 or 15 years when the things are
18 wearing and put aside reserves for the
19 future

20 So -- that's all I'm going to
21 say.

22 THE CHAIRPERSON: You can
23 conclude the sentence. "So"?

24 MR. WEINSTEIN: I didn't even
25 get to zQA.

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THE CHAIRPERSON: That's okay.
Your four minutes are up.

Questions for Mr. Weinstein?

MR. WEINSTEIN: I was just
rushing to the get to the questions.
That's all.

THE CHAIRPERSON: Ms. De La Uz
and then Ms. Efron.

COMMR. DE LA UZ: Would you
please give us your thoughts on ZQA?

MR. WEINSTEIN: Sure.

My thoughts -- I mean, ZQA
really is a zoning program, and it would
help fill -- it would help organizations
like Phipps, because it's -- the
production of affordable housing is likely
going to come from organizations like
Fifth Avenue Committee and Phipps and some
for-profit developers to produce this
enormous volume of units that we need.
And ZQA helps those units be of higher
quality and more affordable.

And I would -- I would turn to
Commissioner Cantor's point, even though

Proceedings

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2 it's affordable housing doesn't mean it's
3 not market responsive. I'll give you
4 some -- so we've built parking lots. I
5 can give you -- buildings we built in the
6 70s with 375 -- a parking garage of
7 375 cars. Seventy-five households park
8 there of the development. One we did in
9 2001 with 85 units and 25 parking spaces,
10 three households parked there.

11 Our very celebrated Via Verde
12 development waived parking through a
13 community engagement process. However,
14 this isn't to say that when we build
15 buildings on Barnett Avenue in Queens, I
16 hope, in Far Rockaway, I hope, and in
17 Forest Hills, of course we'll build
18 parking. Why? Because it's, market
19 responsive, and it is hard to recruit
20 tenants even at below-market rate rents.

21 So the availability of the
22 option to waive parking is something to
23 consider, but no developer, for-profit or
24 not-for-profit is going to build something
25 that wont rent up.

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THE CHAIRPERSON: Thank you.

Ms. --

MR. WEINSTEIN: One other ZQA
comment.

I would tweak some of the
setback requirements.

Oh, I would also say the
sites -- in a city that is constrained for
sites, the sites that we are building
today are irregular. So all of the lot
coverage, easing and rear yard and
setbacks are really terrific. They make
such a difference to build a building
that, by the way, we go to a community
board in The Bronx, and say we'd like to
build this building, and they say great,
and we say, We can't, the lot coverage
won't permit it or the yard requirement or
setback requirement.

Now, with regard to setbacks, I
would encourage the Department, if the ZQA
goes forward to engage little bit with
builders and architects, I know we have
already, because affordable housing

Proceedings

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2 buildings are built with block and plank,
3 and there are practical considerations
4 about the use of plank that make a 10-foot
5 setback, for instance, versus an 8-foot
6 setback, a meaningful two feet.

7 THE CHAIRPERSON: Mr. Efron
8 then Ms. Ortiz.

9 COMMR. EFFRON: Thank you. And
10 thank you for 110 or 120 -- 110 years of
11 experience, so I'm not you sure you can
12 actually answer my question, but perhaps.

13 We hear a lot about
14 predictability, and I wonder if you can
15 quantify the value of that
16 predictability --

17 MR. WEINSTEIN: Sure.

18 COMMR. EFFRON: -- for your
19 typical development.

20 MR. WEINSTEIN: That's
21 worthwhile. That's something I've thought
22 a lot about, the predictability,
23 presumably, of mandatory. The reality is
24 for most of the housing that we're
25 using -- that we're developing using HPD's

Proceedings

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2 programs, mandatory is not relevant. It's
3 relevant in that it gives us the ability
4 in certain cases, depending on the size of
5 the lot to do -- to build a little bit
6 more FAR but not a lot.

7 So we're often constrained by
8 construction methods first, not height.
9 Twelve stories is going to be a
10 limitation. If we have to move to a
11 different construction method, it can't be
12 affordable housing. By construction
13 method, I mean, for the audience's sake,
14 this is just the superstructure of the
15 building built out of -- it's invisible to
16 everyone, but if you start building out of
17 poured-in-place concrete, as they do for
18 skyscrapers, it simply can't be borne by
19 affordable housing programs.

20 That said, having the
21 predictability is worthwhile. I recently
22 wrote to my Board of Directors that when I
23 joined Phipps in 1989, a hundred percent
24 of the projects we were doing -- or the
25 cost -- a hundred percent of the costs of

Proceedings

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2 projects we were doing that year were
3 borne entirely by the taxpayers of New
4 York City.

5 In 2001, when I became Phipps's
6 President and CEO, 67 percent of the
7 projects we were doing then was borne by
8 the taxpayers of New York. Today,
9 something between 30 to 35 percent are
10 borne by the taxpayer. This -- so this
11 infusion of private market capital demands
12 predictability.

13 THE CHAIRPERSON: Ms. Ortiz.

14 COMMR. ORTIZ: Hi. I thank you
15 for that. You really got me thinking, and
16 one thing you said in particular I wanted
17 some clarification on. You said that, you
18 know, there's really a hole; you said a
19 chicken nugget or something --

20 (Laughter.)

21 COMMR. ORTIZ: -- and that, you
22 know, we don't have subsidy for households
23 that are 50 or 60 percent of AMI.

24 MR. WEINSTEIN: No, the
25 opposite. Affordable is the opposite.

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COMMR. ORTIZ: Yes. Go on.

We're not able to subsidize the middle income range through existing programs.

MR. WEINSTEIN: Of greater than -- between 60 and 90.

COMMR. ORTIZ: Okay. Between 60 and 90, okay.

MR. WEINSTEIN: Or -- and, for that matter, for households lower than -- and I should point out for the households, lower than 50, you're really dipping into 40 to extremely and very low and extremely low households. HPD's programs have been modified to account for those units, and we're happy to produce them, but they don't -- they are a -- when putting together your model to build the housing even for a not-for-profit, those households -- to insist that all the households average 30 percent of AMI, that's a building where even the operating costs will need to be subsidized, putting aside the cost of building the building.

COMMR. ORTIZ: Okay.

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MR. WEINSTEIN: Does that makes sense to you?

COMMR. ORTIZ: Okay. So, but there are there are, there are subsidies that allow us to get at some deeper level of affordability below that 60 percent.

MR. WEINSTEIN: Yes. Rental subsidies.

COMMR. ORTIZ: Okay. And so is what we're doing converting land value that's really defined as FAR here into a subsidy for that whole that you're identifying? Is that sort of another way to look at this MR. WEINSTEIN: Let me, I think, answer your question, but in an angle shot (indicating).

There are still lots of property that will be developed in the City of New York for affordable housing purposes, and I would say the vast bulk of the 80,000 new construction units in the Mayor's plan will be produced this way.

Where the principles of the market place, meaning market place

Proceedings

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2 capital, will not apply. Free land will
3 still not build you a building. I will
4 maintain East New York is one of these
5 places. It is very, very, very difficult
6 to build a market-rate apartment building,
7 except the smallest, most poorly
8 constructed--the kind of housing we don't
9 want to encourage, to be perfectly
10 honest--just with conventional financial
11 sources; they will need subsidy.

12 And HPD is available and this
13 administration and the prior
14 administration and the priors
15 administration have realized this,
16 miraculously, in a way that no other city
17 has, to commit the kind of capital to
18 ensure that work force housing is
19 available here. Work force, meaning --
20 and I mean it in the broadest sense;
21 people who are -- push gurneys, drive
22 cabs, you know, provide living wage jobs.

23 Does that make sense? Does that
24 answer your question?

25 COMMR. ORTIZ: Well, to some

Proceedings

1
2 extent. I guess I'm trying to say, we're
3 using FAR in a way as currency here to
4 fill a hole.

5 MR. WEINSTEIN: But I'm
6 suggesting to you that no amount FAR -- I
7 will leave FAR on the table.

8 COMMR.. ORTIZ: In the weakest
9 markets, absolutely, I agree with you.

10 MR. WEINSTEIN: Yeah.

11 COMMR. ORTIZ: Yeah.

12 MR. WEINSTEIN: Those are the
13 markets I'm speaking to.

14 COMMR. ORTIZ: Okay.

15 MR. WEINSTEIN: In -- and New
16 York has the embarrassment of riches in
17 terms of FAR in strong markets, and MIH
18 program, as provided can be tweaked, can
19 be tweaked at income levels and still
20 produce the kind of cross-subsidy,
21 internal cross-subsidy that you're looking
22 for.

23 COMMR. ORTIZ: Well, that also
24 then gets back to the previous question I
25 asked, which is, you know, this issue of

Proceedings

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2 payment-in-lieu; you know, that we're able
3 to generate it in the strongest
4 neighborhoods but not in the weakest, but
5 where maybe we need it is in the weakest
6 neighborhoods. I don't know what you
7 think about that.

8 MR. WEINSTEIN: Well, I mean
9 it's a complicated question, obviously,
10 and it's one that gets to issues of nexus
11 potentially. Look, as someone who spends
12 his entire working day and weekend
13 thinking how do I create investment in
14 communities that lack it? How do I build
15 affordable housing in communities where
16 people are legitimately poor, where
17 schools aren't as good, and where jobs
18 are -- the unemployment rate is higher,
19 that's a welcome thing, provided you know,
20 have a decent transit system and you can
21 get to work, and provided that schools are
22 mostly the same throughout New York City.
23 That's a fair question.

24 COMMR. ORTIZ: Thank you.

25 THE CHAIRPERSON: Mr. Eaddy.

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COMMR. EADDY: Adam, hi.

Will you be providing in your written testimony your comments and observations regarding ZQA or will you be providing written testimony?

MR. WEINSTEIN: Should I me to copy my notes?

THE CHAIRPERSON: Be careful what you ask for, Mr. Eaddy.

MR. WEINSTEIN: I think you should pay attention to the Chairman.

I'll try to, Richard.

THE CHAIRPERSON: Any other questions for Mr. Weinstein?

(No response.)

THE CHAIRPERSON: Thank you.
Thanks a lot.

(Continued in Volume II.)

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CERTIFICATE

STATE OF NEW YORK) ss.:

We, JENNIFER CASSELLA and
GARRY J. TORRES, Shorthand Reporters and
Notaries Public within and for the State
of New York, do hereby certify:

We reported the foregoing
hearing, and that the within transcript is
a true record of such proceedings, to the
best of our abilities.

We further certify that I we not
related, by blood or marriage, to any of
the parties in this matter and that we are
in no way interested in the outcome of
this matter.

IN WITNESS WHEREOF, we have
hereunto set my hand this 23rd day of
December 2015.

JENNIFER CASSELLA

GARRY J. TORRES

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TRANSCRIPT OF THE
DEPARTMENT OF CITY PLANNING COMMISSION
PUBLIC HEARING

WEDNESDAY, DECEMBER 16, 2015

ONE BOWLING GREEN
BOROUGH OF MANHATTAN

VOLUME II

3:02 p.m. - 10:00 p.m.

Reported by:

Nicole Ellis

Kari L. Reed, RPR

1

2 HEARING CONVENED AT 9:04 A.M.

3

4 PRESENT:

5 CARL WEISBROD, CHAIRPERSON

6 KENNETH J. KNUCKLES, VICE CHAIRPERSON

7 RAYANN BESSER, COMMISSIONER

8 IRWIN G. CANTOR, COMMISSIONER

9 ALFRED C. CERULLO, III, COMMISSIONER

10 MICHELLE DE LA UZ, COMMISSIONER

11 JOSEPH I. DOUEK, COMMISSIONER

12 RICHARD W. EADDY, COMMISSIONER

13 CHERYL COHEN EFFRON, COMMISSIONER

14 ANNA LEVIN, COMMISSIONER

15 ORLANDO MARIN, COMMISSIONER

16 LARISA ORTIZ, COMMISSIONER

17 YVETTE V. GRUEL, CALENDAR OFFICER

18

19 Also Present:

20 Staff

21 The Public

22 The Press

23

24

25

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1
2 THE CHAIRPERSON: Our next
3 speaker is Lisa Gomez. Welcome,
4 Ms. Gomez, as a former member of this
5 Commission.

6 MS. GOMEZ: Thank you,
7 Mr. Weisbrod.

8 Hi, my name is Lisa Gomez. I'm
9 the Chief Operating Officer of the L&M
10 Development & Partners. We're a New
11 York-based company that's committed to
12 building affordable housing and
13 mixed-income projects to strengthen our
14 city. We've built more than 15,000
15 apartments, most of those affordable or
16 mixed-income and most of those in New York
17 City. I'm also the Chair of the Board at
18 NYSFAFH, an industry organization that
19 represents hundreds of organizations
20 statewide who build most of the affordable
21 housing in New York. And, as Carl
22 properly noted, I'm an alumna of this
23 guest body, so I will be sustained.

24 (Laughter.)

25 MS. GOMEZ: We strongly support

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1
2 ZQA. It's a smart, forward thinking piece
3 of zoning texts that helps counter the
4 ever-increasing cost of construction by
5 streamlining it's zoning regulations. The
6 city's current zoning regulations are
7 really filled with unnecessary obstacles
8 that hinder affordable housing
9 development. Some examples of this, all
10 deference to Commissioner Cantor, really
11 are the parking requirements that result
12 in half empty parking lots from
13 Williamsburg to Brownsville, and building
14 envelopes -- building envelope
15 restrictions that really result in
16 cramped, unappealing ground floor
17 commercial spaces, which can actually be
18 real blight into -- for urbanism.

19 New York City needs updated
20 zoning regulations that will create better
21 buildings and more affordable units. We
22 strongly believe that ZQA will go a long
23 way toward achieving these important
24 objectives. The new regulations will also
25 provide a greater range of options to

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1
2 design buildings and reinforce the
3 character of their neighborhoods. And ZQA
4 will ensure resources are directed where
5 they're needed most, to address the City's
6 housing crisis.

7 We also support Mandatory
8 inclusionary Housing. Mandatory
9 inclusionary is an important tool that
10 leverages market-rate development for the
11 creation of more affordable housing. MIH
12 will improve communities across New York
13 City by promoting housing production
14 across a variety of income levels. And I
15 want to pick upon a theme that Adam
16 mentioned, that I've heard a lot of today
17 and that is deeper AMI, more flexibility
18 and I do want to highlight that, as did
19 Adam, that these are meant to be averages,
20 and I think it's also important to note
21 that these initiatives will be applied
22 within a broader ULURP construct, there
23 will be a conversation with City Planning
24 the City Council, Community Board, Borough
25 president, and developers. And I have yet

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1
2 to see someone ever, ever, ever submit
3 something and everybody go, Oh, yeah that
4 sounds great.

5 (Laughter.)

6 MS. GOMEZ: So we know these
7 initiatives will help mitigate the housing
8 crisis facing our city. We hope that both
9 tax amendments will pass so we can further
10 our commitment to building more affordable
11 housing throughout the five boroughs. And
12 I just want to compliment the staff who do
13 the real work here and who are smart,
14 thoughtful, creative, and who provide us
15 with a great basis for this dialogue

16 Thank you.

17 THE CHAIRPERSON: Thank you,
18 Ms. Gomez.

19 That is Mr. Cantor. It's
20 Mr. Cantor, and then Vice Chairman
21 Knuckles.

22 COMMR. CANTOR: Pick a number.
23 My question, I don't want to give the
24 impression that I'm totally against
25 removing parking, but the issue gets back

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1
2 to parts of the area, the perimeters of
3 the City of New York, the perimeter of
4 Queens, the dead ends of the subways,
5 those areas, and other areas like them in
6 the City, are the ones that I'm speaking
7 to, where you'll get drivers galore, Hey,
8 I used to go to Willits Point religiously
9 when I was riding the subway because it's
10 an area to go to, but many, many people
11 are going to the periphery areas where
12 there are homes, not parking garages, and
13 that's the areas I'm speaking to.

14 Now my question to you would be,
15 when you comment about the unutilized or
16 underutilized spaces, how many of them are
17 the way I'm describing it, in the
18 perimeter and how many are deeper in where
19 I don't have the same feeling?

20 MS. GOMEZ: I would say it's a
21 mix I mean would say that the particular
22 development I'm thinking of in Ocean Hill,
23 Brownsville is not very proximate to the
24 subway, but we have a surface parking lot
25 which, maybe four, five cars occupy

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1
2 probably a 30-unit parking lot. But I
3 also want to highlight that this is an
4 ability to waive in transit-rich areas.

5 If you're in the Rockaways, yes,
6 there is an A train there, but I'd be --
7 I'd be surprised if parking waivers were
8 granted in places where there really isn't
9 reliable mass transit. I mean, I know
10 that that is a concern, I've seen it, but
11 I've also seen -- we've built in
12 Williamsburg, which is fairly
13 transit-rich, although this is not a
14 particularly subway-accessible area, we've
15 built hundreds of parking spaces. Those
16 could have been apartments or community
17 facilities or even a gym for the residents
18 of the building, but they're, you know,
19 they're required by zoning. It's required
20 to be attended, because that's how the
21 footprint of the building stacked, and
22 it's really -- it's inefficient. I think
23 there are ways to waive that parking.

24 I think that obviously car
25 ownership and proximity to transportation

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1
2 have to be first and foremost in those
3 considerations.

4 COMMR. CANTOR: Thank you.

5 THE CHAIRPERSON: Any other
6 questions for Ms. Gomez?

7 Yes, Mr. Knuckles.

8 COMMR. KNUCKLES: Lisa, good to
9 see you.

10 MS. GOMEZ: You too, Ken.

11 COMMR. KNUCKLES: This morning
12 we heard testimony, I think from elected
13 officials, about the need or at least the
14 suggestion that amongst the affordable
15 options, i.e., 60 percent AMI, 80 percent
16 AMI, that there needs to be more diversity
17 within those particular strains.

18 I guess my question is, as a
19 mainstream developer in New York City,
20 what do you think are the lower reaches of
21 AMI? You know, how deep can you go
22 before, you know, blowing up your business
23 model essentially?

24 MS. GOMEZ: Well, I think Adam
25 sort of said it. I think that at a

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1
2 30 percent AMI, you're not covering --
3 your rent is not covering the cost of
4 operations and there really has to be
5 operating subsidies, which in the world
6 today is the very limited Section 8.

7 I would submit, though, that
8 it's easier to get from 60 to 50 to 40
9 than it is to get to 70 and 80 for the
10 exact reasons Adam mentioned, which
11 were -- which is really the provision of
12 the Federal Low-Income housing Tax Credit,
13 which really goes a long way to
14 subsidizing.

15 I believe within the framework
16 that you have for an average, you
17 certainly have an ability to negotiate
18 then. There is a lower limit, but if you
19 did more 30s, you could do higher income.
20 I think there's always a balance, and
21 we've probably done as much of that kind
22 of mix and matching as anyone in town, and
23 it's doable. It's not doable in every
24 market and you can't -- it really isn't a
25 one size fits all, but I don't think what

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1
2 you have before you is a one-size-fits-
3 all proposal.

4 COMM. KNUCKLES: Thank you.

5 THE CHAIRPERSON: Any other
6 questions for Ms. Gomez?

7 (No response.)

8 THE CHAIRPERSON: Thank you.
9 Good to see you again.

10 MS. GOMEZ: Thank you. Good to
11 see you all.

12 THE CHAIRPERSON: The next five
13 speakers in opposition now are Sandy
14 Reiburn, John Daniels, Jean Standish,
15 Rodolfo Cumberbatch, and Jassir Escobar.

16 And just to give you a sense,
17 we're on -- that's numbers 36 to 40.

18 Sandy Reiburn?

19 MS. REIBURN: Yes, Sandy
20 Reiburn.

21 THE CHAIRPERSON: Thank you.

22 MS. REIBURN: Thank you so much
23 for allowing me to bring some what I hope
24 will seem like new information.

25 I'm the daughter of one of 123

Proceedings

1
2 evicted senior residents at the Prospect
3 Park Residence in Brooklyn, in Park Slope,
4 and the story that I want to tell you is
5 about how a real estate developer
6 masquerading as an assisted living
7 facility, not unlike the concept of the
8 ZQA, talking about promulgating more
9 senior living, long-term care facilities,
10 bought the building in 2006, purported it
11 to be an assisted living residence. At
12 that point, of course, the assisted living
13 residence concept was a relatively new
14 entity in the halls of Albany, where the
15 Department of Health legislates --
16 regulates, that entity, that concept.

17 So as the J-51 Abatement was
18 coming to the fore at the Prospect Park
19 Residence, all of the sudden this
20 unlicensed owner, who is a real estate
21 developer, whose father-in-law is a
22 notorious real estate developer, went
23 ahead. Can you imagine, he got himself
24 licensed with the Department of Health in
25 2013, and everyone had to give up their

Proceedings

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2 tenancy rights, their New York City
3 tenancy rights, to sign an agreement under
4 the imprimatur of the Department of
5 Health. Well, hey, my mother was one of
6 them, and wouldn't you know it, six months
7 later the building owner said, Gee, we're
8 having business reversals, we need to put
9 in for closure. So here's this guy who's
10 owned this building for 2006, applies for
11 licensure in 2013, and six months later
12 figures out, well, he just can't sustain
13 the building.

14 Well, part of the reason was
15 that this building that he had bought for
16 \$40 million he had sold to a developer for
17 \$76-and-a-half million. This case -- and
18 there are five remaining there, too
19 fragile, too vulnerable to be moved, one
20 of whom, actually, one of the six as of
21 last week died, he was a Holocaust
22 survivor.

23 The point that I want to make is
24 that it is fine to say that we are going
25 to protect our seniors in what is very,

Proceedings

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2 very sorely needed, long-term care
3 facilities, senior housing, all of that,
4 but this becomes a bait-and-switch for a
5 consortium of nursing home a/k/a long-term
6 care a/k/a real estate developers, who
7 basically leverage that concept and
8 relinquish the City's rights to the State.

9 It's under litigation now, the
10 Department of Health is being sued, the
11 developer's being sued. It is in Brooklyn
12 Supreme Court under Judge Wayne Saitta.
13 So what's the ask? What's the ask?

14 The ask is very simple. There
15 is a bill that is in the State
16 legislature, in limbo, that originally
17 Assemblywoman Millman wrote to require
18 that long-term care facilities maintain
19 closure over a period of at least one year
20 to give people who have downsized,
21 vulnerable elders, we're talking about the
22 old, old here; we're not talking about
23 someone who might or might not give up
24 their parking ability in a parking lot
25 next door; these people basically were

Proceedings

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2 told that they had to move in three
3 months, in 90 days, and the Department of
4 Health sanctions that.

5 So can I ask what my ask is or
6 am I -- or have I put everybody to sleep?

7 THE CHAIRPERSON: If you can do
8 it in one sentence.

9 MS. REIBURN: My ask is that the
10 City require developers of so-called
11 long-term care facilities, assisted living
12 residences, to give a one-year notice,
13 unlike the bill that is lingering in
14 Albany that has not done so.

15 Thank you so much for your time.

16 THE CHAIRPERSON: Thank you.
17 Maybe a question from --

18 MS. REIBURN: Okay.

19 THE CHAIRPERSON: Let me just
20 say that under ZQA, a developer of -- or
21 anyone getting additional space for senior
22 affordable housing under the proposal
23 before you today or before us today could
24 never convert that space back to
25 market-rate housing.

Proceedings

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MS. REIBURN: Yes, they can.

THE CHAIRPERSON: No, not under the proposal we have today.

MS. REIBURN: But if they apply for licensure --

THE CHAIRPERSON: Under City zoning, they could never convert it to market-rate housing.

MS. REIBURN: Can they apply for licensure?

THE CHAIRPERSON: This is a proposal that's before us today, I can't speak to the State legislature.

MS. REIBURN: But that's what I'm speaking to because I think it's important for you to connect the dots.

THE CHAIRPERSON: No. I would just to say to you, I would just say to you we often say here we wish we could control State legislation, and we certainly try to do so, but we don't control State legislation. However, under this zoning proposal this -- whatever additional affordable senior housing is

Proceedings

1
2 created could never, irrespective of State
3 legislation, be converted back to
4 market-rate housing.

5 MS. REIBURN: Were you going to
6 ask me something?

7 THE CHAIRPERSON: Yes,
8 Ms. De La Uz.

9 COMMR. DE LA UZ: Well, first, I
10 really appreciate you being here.

11 The -- what has been going on at
12 the residence is reprehensible and
13 absolutely not something that should be
14 tolerated and, you know, I certainly hope
15 that the State legislature takes a very
16 close look at the role that they played,
17 or that the Department of Health played in
18 New York State in what happened at the
19 residence. And I wish you the best, and
20 all the residents there, the best of luck
21 in trying to bring some justice and some
22 clarity to the situation.

23 I would just say, again, I think
24 there's -- oftentimes governments --
25 government is often painted with the same

Proceedings

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2 broad brush, and I would want to say that
3 as it relates specifically to the proposal
4 here, as it relates to Zoning For Quality
5 and Affordability, what happened at that
6 facility under State licensure would not
7 be able to happen.

8 But I think your ask is a good
9 one to bring forward more broadly in the
10 City. So thank you for being here.

11 MS. REIBURN: May I comment to
12 that --

13 THE CHAIRPERSON: Sure you can.

14 MS. REIBURN: -- if I may, if I
15 may.

16 And thank you because I really
17 want to put a human face on this. And
18 what I want to say is that this was a
19 building that was tenanted by people who
20 were protected by the City, and once that
21 owner in a constructive fraud scheme went
22 ahead and did that -- you know, we've got
23 the same thing going on with Oxford
24 basically and their conversion -- their
25 sale of their nursing home to move that

Proceedings

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2 facility to Red Hook, where, in
3 contravention of zoning protection, they
4 are going to go ahead, these very same
5 people who went ahead and over-sedated
6 their Fort Greene South Oxford residents.

7 We need to have some ownership
8 of a very unsexy topic, our loved ones,
9 ourselves. We really need to connect the
10 dots. With that, I appreciate the extra
11 time. Thank you.

12 THE CHAIRPERSON: And thank you
13 very much.

14 MS. REIBURN: Thank you.

15 THE CHAIRPERSON: Does anyone
16 else have any questions for Ms. Reiburn?

17 (No response.)

18 THE CHAIRPERSON: Thank you.

19 John Daniels? John Daniels?

20 (No response.)

21 THE CHAIRPERSON: Jean Standish?

22 (No response.)

23 THE CHAIRPERSON: Rodolfo
24 Cumberbatch?

25 (No response.)

Proceedings

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THE CHAIRPERSON: Jassir

Escobar?

(No response.)

THE CHAIRPERSON: Okay,

switching back to those in favor. The next five speakers, these are numbers 41 through 45, David Karnovsky, Caaminee Pandit, I think, Paul Freitag, Shai Lauros, and James Rausse.

Starting with Mr. Karnovsky.

Welcome back, Mr. Karnovsky.

(Laughter.)

MR. KARNOVSKY: Thank you. Good afternoon.

THE CHAIRPERSON: I think the Commission looks forward to hearing from you.

COMMR. CANTOR: You want a job?

MR. KARNOVSKY: Good afternoon, .

Mr. Chairman and members of the Commission. My name is David Karnovsky, I'm a member of the law firm of Fried, Frank, Harris, Shriver & Jacobson, practicing land-use law, but I wanted to

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2 say that I'm here today in my individual
3 capacity in order to make a few remarks
4 and observations about the MIH proposal
5 that's pending before you today.

6 First, I wanted to address
7 arguments that if you haven't heard
8 already you may well hear, that the MIH
9 proposal is legally vulnerable and
10 possibly unconstitutional on the basis
11 that its requirements for the provision of
12 affordable housing impose conditions that
13 bring into play what's called the
14 Unconstitutional Doctrine --
15 Unconstitutional Conditions Or Exactions
16 Doctrine under the Takings Clause. And
17 the argument is essentially that this
18 proposal, like Mandatory Housing
19 regulations elsewhere in the country, are
20 only valid if the City can produce
21 evidence demonstrating that the
22 affordability requirements are related to
23 and proportional to an adverse impact on
24 the City's housing supply that is caused
25 by the very developments that are the

Proceedings

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2 subject of the affordability requirement.

3 Now this argument has been made
4 in a number of cases and, as far as I am
5 aware, has never been accepted, and most
6 recently, the California Supreme Court
7 specifically rejected it. And while the
8 decisions of that court are not binding in
9 New York, it's highly instructive
10 nonetheless. Highly instructive because
11 there the Court considered a Mandatory
12 Inclusionary Housing ordinance from the
13 City of San Jose, which, like the one
14 before you today, has as its principal
15 purpose that of assuring new affordable
16 housing units are constructed and
17 distributed throughout the City to create
18 mixed-income and economically diverse
19 communities, and the Court found that this
20 is was a legislative land-use purpose and
21 that rather than being an exaction the
22 ordinance fell with the municipality's
23 broad discretion to regulate the use of
24 real property to serve the legitimate
25 concerns of the public and the community

Proceedings

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2 at large. And the MIH proposal before you
3 is grounded on the same land-use rationale
4 and is, in my view at least, likely to be
5 viewed the same way by the courts, both
6 state and federal.

7 Now because MIH is a general
8 land-use regulation intended to apply
9 throughout the City, it's been designed to
10 operate under a range of market
11 conditions, as you know. It is not based,
12 and should not be based, on the idea that
13 in any given neighborhood or any given
14 site the City should wring out as much
15 affordable housing as it can from owners
16 and developers. That isn't land-use
17 regulation focused on creating vibrant,
18 mixed-income neighborhoods but instead
19 it's a form of extraction, which would be,
20 in my judgement, legally vulnerable.

21 The fact that a development on a
22 site in a particular neighborhood might be
23 financially viable with an unsubsidized
24 50 percent affordability requirement isn't
25 a land-use justification for going down

Proceedings

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2 that particular path.

3 Now another feature of MIH I
4 wanted to comment on is the need for some
5 kind of safety valve, to address the
6 situation where application of the
7 requirements to a particular site is
8 unworkable. The courts have recognized
9 that provisions like the one found in your
10 Section 73-624 of the text, which allows
11 for a reduction or modification of the
12 requirements, are important to the
13 legality of the requirements. The concern
14 that this safety valve not become a leaky
15 faucet is legitimate, but that isn't a
16 reason for it's elimination. My own view
17 is that the BSA is the right body to make
18 determinations whether MIH requirements
19 should be waived or modified in a given
20 instance, because it's a neutral and
21 quasi-independent body that can make fair
22 and dispassionate determinations. But, at
23 the same time HPD should have a role in
24 these proceedings, and I would suggest
25 that HPD be made a kind of statutory party

Proceedings

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2 to these proceedings under 73-624, allowed
3 to participate and present it's position
4 before the Board on whether a waiver or
5 modification is warranted under the
6 circumstances. And this would be similar
7 to the way the City Planning functions and
8 can appear and make it's position known to
9 the Board in variance cases.

10 I wanted to finally comment on
11 provisions of the proposal that would
12 allow the Commission to apply MIH to
13 applications with special permits, quote,
14 "where consistent with the objectives of
15 the MIH program provided further that the
16 commission could modify these requirements
17 where it finds that the permit application
18 would facilitate significant public
19 infrastructure of public facility." As
20 drafted, these provisions give the
21 Commission very significant leeway to
22 determine whether MIH should apply to a
23 special permit and under what conditions,
24 and by allowing the Commission to do so,
25 they introduce into MIH the kind of ad hoc

Proceedings

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2 case-by-case decision-making which is a
3 chief characteristic of the exactions that
4 tend to be disfavored by the court.

5 So I think these provisions
6 require substantial clarification, first,
7 by being clear about what kind of special
8 permits this may apply to. Secondly, by
9 being clear about whether the provisions
10 apply to special permits through incentive
11 bonuses, because as currently drafted and
12 it appears that it might, and the
13 possibility that in connection with a
14 bonus incentive provision, like a subway
15 improvement, that the applicant might have
16 to provide not just the bonus improvement
17 but affordable housing needs to be
18 addressed --

19 FEMALE SPEAKER: The bell rang.

20 MR. KARNOVSKY: -- and I think
21 this is an area that deserves further
22 scrutiny.

23 THE CHAIRPERSON: Thank you.

24 Questions for Mr. Karnovsky?

25 Ms. De La Uz.

Proceedings

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2 COMMR. DE LA UZ: Thank you very
3 much for being here. As always it's
4 helpful to hear your thoughts and your
5 detailed suggestions. I particularly
6 appreciate the comments about HPD's
7 recommended role related to the BSA piece.

8 I'm just wondering going back to
9 your piece about the delicate balance --
10 about maintaining the justification on MIH
11 as a land-use justification, and not
12 wringing out as much value as possible, I
13 mean, this is maybe -- I don't know if
14 this is really the right question for you
15 given the perspective from a legal
16 perspective, but in your review of
17 mandatory text elsewhere, how close are we
18 to that compared to other municipalities?

19 I guess I would want to get as
20 close as possible without being viewed as
21 being at-risk.

22 MR. KARNOVSKY: I think your
23 staff has actually done a pretty thorough
24 review of the ordinances and other
25 jurisdictions and has come to the

Proceedings

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2 conclusion, and you should review it with
3 them I think, that this is a very
4 wholesome and aggressive proposal, but at
5 the same time, it's designed to apply
6 citywide in a range of contexts and market
7 conditions and that's different from
8 trying to fixate on a particular location
9 or a particular site or particular
10 neighborhood where the possibility may
11 exist of doing more structuring the
12 proposal on that basis, and that's a very
13 different approach.

14 THE CHAIRPERSON: Any other
15 questions for Mr. Karnovsky?

16 (No response.)

17 THE CHAIRPERSON: Are you going
18 to submit your testimony?

19 MR. KARNOVSKY: I will retype it
20 and submit it, yes.

21 THE CHAIRPERSON: Thank you,
22 you're going to be like Adam Weinstein.

23 The next speaker is, is it
24 Caaminee Pandit -- I may not be
25 pronouncing that correctly -- from the

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Criterion Group?

(No response.)

THE CHAIRPERSON: Okay. The next speaker is Paul Freitag, West Side Federation for Senior Supportive Housing.

MR. FREITAG: Good afternoon. I'm the Executive Director of the West Side Federation for Seniors and Supportive Housing, affectionately known as WSFSSH, and I'm here to strongly support the provisions of ZQA that will help seniors remain in their communities by making it easier to provide affordable senior housing and care facilities.

Older New Yorkers are the City's fastest growing demographic and will account for 20 percent of the population by 2030. Sadly, an estimated one in five older New Yorkers are living in poverty. WSFSSH develops, manages, and owns over 1,700 units of affordable senior housing in the Bronx and Manhattan that range from independent living apartments to facilities that provide extensive services

Proceedings

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2 to allow seniors to age in place.

3 From our position on the front
4 lines we recognize that the need for
5 affordable senior housing has reached a
6 crisis level. The number of seniors on
7 our waiting list is counted in the
8 thousands and the wait time for an
9 apartment is counted in years. It is
10 sobering to tell a senior citizen that the
11 wait time for an apartment may be longer
12 than the reasonable estimate for the
13 balance of his or her lifetime.

14 WSFSSH has firsthand experience
15 with the zoning envelope issues that the
16 ZQA is attempting to address. We believe
17 that the proposed modifications regarding
18 ground floor units, setbacks, unit sizes
19 and especially parking will promote the
20 development of high-quality,
21 cost-effective, affordable senior housing.

22 We particularly appreciate the
23 provision that allows for additional
24 height in order to be able to fit in the
25 allowable floor area. This will directly

Proceedings

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2 translate into more affordable senior
3 apartments.

4 WSFSSH strongly supports the
5 provisions in ZQA that will create the
6 opportunities for more and higher quality
7 affordable senior apartments. We hope
8 that these provisions can act in
9 combination with regulations that protect
10 the affordability of the units for the
11 long-term and incentivize production by
12 non-profit developers who are committed to
13 building permanently affordable senior
14 housing.

15 Thank you.

16 THE CHAIRPERSON: Thank you very
17 much, Mr. Freitag.

18 Any questions?

19 Mr. Knuckles.

20 COMMR. KNUCKLES: Paul, how are
21 you?

22 MR. FREITAG: Good, thank you.

23 COMMR. KNUCKLES: And
24 congratulations again.

25 MR. FREITAG: Thank you.

Proceedings

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2 COMMR. KNUCKLES: Just your
3 thoughts on the parking in the Zoning for
4 Quality.

5 MR. FREITAG: WSFSSH
6 particularly operates in areas that are
7 very transit-rich. All of our buildings
8 are on the West Side of Manhattan, up in
9 western northern Manhattan, Harlem, and
10 the Bronx.

11 COMMR. KNUCKLES: Right.

12 MR. FREITAG: So most of our
13 buildings have immediate access to the
14 subway system, very good bus transit, and
15 as such, our residents don't use the
16 parking lots at all. Very few of them
17 actually own cars.

18 COMMR. KNUCKLES: Thank you.

19 THE CHAIRPERSON: Ms. Efron.

20 COMMR. EFFRON: Would you care
21 to comment on some issues that came up
22 around the permanent affordability verses
23 the 30 years for affordable senior
24 housing.

25 MR. FREITAG: Well, I think this

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2 is the issue that we're most concerned
3 with. We'd like to see whether provisions
4 could be included to strengthen the length
5 of time of the affordability for the
6 senior housing that's being incentivized
7 under ZQA.

8 Now I understand there's concern
9 about takings issues and whether or not it
10 would have legal standing, but I think
11 whatever could be done in order to secure
12 the affordable senior housing for
13 absolutely as long as possible should be
14 included.

15 THE CHAIRPERSON: Any other
16 questions?

17 (No response.)

18 THE CHAIRPERSON: Thank you, Mr.
19 Freitag.

20 Next speaker is Shai Lauros.

21 Shai? There she is. Welcome.

22 MS. LAUROS: Thank you, Chair
23 and Commissioners. My name is Shai Lauros
24 and I'm here on behalf of Cypress Hills
25 Local Development Corporation, a CDC and a

Proceedings

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2 non-profit affordable housing developer
3 for approximately 30 years.

4 Cypress Hills LDC has recently
5 started construction on the senior housing
6 development that required a zoning
7 authorization and a Mayor zoning override
8 in order to build an affordable senior
9 housing project. I can go into details
10 after my testimony if you like.

11 As a result of these experiences
12 and the desperate need for affordable
13 senior housing, I want to note our support
14 to address the zoning challenges to these
15 types of developments as is outlined in
16 the Zoning for Quality and Affordability.
17 However, I also want to note a few
18 particular areas of concern for our
19 community.

20 First, parking is a concern in
21 Cypress Hills and East New York, as it is
22 in many other neighborhoods across the
23 five boroughs, in areas where public
24 transportation is insufficient. As the
25 City proposes in the Zoning for Quality

Proceedings

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2 and Affordability to effectively reduce
3 the future availability of parking in
4 developments, the City must support and
5 invest -- sorry -- in addressing the
6 current public transportation
7 deficiencies.

8 Second, the efforts and energies
9 that communities invest in participating
10 in the design of their neighborhoods via
11 the zoning process is extremely valuable.
12 It is democracy at work. There have been
13 negotiations and decisions to limit
14 heights in neighborhoods with historic
15 character and those with a lower density,
16 particularly important to that community
17 and geography. This community work needs
18 to be appropriately respected. A citywide
19 resolution needs to address those
20 particularities with a finer brush than is
21 currently being applied.

22 An additional point to include
23 today is that the articulated facades as
24 opposed to the more homogenous flat
25 facades that the Zoning for Quality and

Proceedings

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2 Affordability resolution outlines
3 translates into increased construction
4 costs for the construction of affordable
5 housing. The City, and in particular HPD
6 and HPC, will need to acknowledge this
7 reality and adjust their underwriting
8 assessment and subsidies and funding and
9 provide it accordingly.

10 In addition, given the text
11 amendment's facilitation of retail and
12 potentially better retail, it would behove
13 the City, in particular SBS, to provide
14 supporting guidelines for developers and
15 their retail tenants to be able to fully
16 utilize their space design to be outward
17 facing to the community, and thus fully
18 implement the offerings of the resolution
19 being presented. It would be a shame to
20 make these changes and witness missed
21 opportunities in future developments due
22 to insufficient funding and support.

23 Ultimately the benefits of the
24 Zoning for Quality and Affordable housing
25 are significant, and when matched with

Proceedings

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2 addressing the issues noted and raised by
3 others, it could improve and help to
4 address a real senior housing crisis
5 that's yet to fully reveal itself.

6 Cypress Hills Local Development
7 Corporation is a member, as was noted
8 earlier, of the Coalition For Community
9 Advancement, Progress for East New York
10 and Cypress Hills, which is supporting
11 ANHD, the Associations For Neighborhood
12 and Housing Development's proposal to add
13 more options to the Mandatory Inclusionary
14 Housing Proposal. The combination of the
15 Mandatory Inclusionary Housing and Zoning
16 for Quality and Affordability is quite
17 significant, and in that combination
18 there's no doubt or lack of data to
19 indicate that Cypress Hills and East New
20 York needs more deeply affordable units.

21 Specifically, we believe that
22 the ANHD option of 30 percent of units at
23 30 percent of AMI would be extremely
24 helpful in addressing the dire housing
25 crisis in our neighborhood.

Proceedings

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2 Thank you for your time and
3 consideration.

4 THE CHAIRPERSON: Thank you,
5 Ms. Lauros.

6 Questions?

7 Ms. De La Uz.

8 COMMR. DE LA UZ: Shai, thank
9 you for being here.

10 I'm going pick up on the point
11 you made about facade articulation and
12 subsidy. Have you already taken a look at
13 what that potential difference in cost
14 might be?

15 MS. LAUROS: Well, we've had to
16 cross this bridge in the development of
17 the underwriting for other proposals, and
18 if you look at the construction costs
19 that, for example, our revised senior
20 housing building had to include verses
21 original designs and what their prices
22 were, we were restricted by the funding
23 and subsidy afforded to us for that
24 development such that we had to decrease
25 construction costs and we ended up having

Proceedings

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2 to cut out some of the specifications that
3 we really would have liked to include.

4 So yes, the higher quality
5 design that we had initially attempted for
6 senior housing building did have to be
7 pared down.

8 COMMR. DE LA UZ: Thank you.

9 THE CHAIRPERSON: Any other
10 questions to Ms. Lauros?

11 (No response.)

12 THE CHAIRPERSON: Thank you.

13 Next speaker is James Rausse
14 from APA.

15 MR. BURNS: Hi, good afternoon.
16 I'm Donald Burns, I'm pinch-hitting for
17 James Rausse. He couldn't make it today.
18 Well, he was here, he had to leave.

19 I'm the Past-President of the
20 Chapter.

21 While APA supports zoning
22 changes and inclusionary housing, we feel
23 that these amendments are inherently
24 flawed. With regard to the Zoning For
25 Quality and Affordability, the Chapter

Proceedings

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2 agrees with one of the basic underlying
3 premises of the proposal. The current
4 zoning regulations are often in outdated
5 and non-contextual designs. Inflexible
6 standards can sometimes impede the
7 creation of affordable housing, especially
8 when encountering regular blocks and
9 parcels or unforeseen site conditions.

10 We agree that zoning laws must
11 be periodically updated to reflect past
12 experiences and to incorporate modern
13 reflections on architectural design,
14 community, livability, and the urban
15 experience while providing aesthetic
16 flexibility. However, while intentions --
17 however well-intentioned, we do have
18 concerns that the proposal has a
19 one-size-fits-all approach and does not
20 adequately account for the diversity of
21 neighborhoods and housing stock.

22 The regulations must be more
23 transparent and easier to understand and
24 implemented if the City is to promote
25 rather than impede quality design.

Proceedings

Training of the Building

Department's staff in closer coordination with the Departments of Building and Planning would be necessary to achieve the intentioned results.

With regard to Mandatory Inclusionary Housing, the Chapter supports the mandatory inclusion of affordable units in all areas of the City. The current lottery system is unduly competitive and has produced a inadequate number of units, but we are concerned that the current proposal fails to address over a third of the City's population with incomes at or below 40 percent of area median income. We suggest certain specific recommendations to include in the proposal:

Identify subsidies and incentives for units in the 100-to-120 percent AMI range, particularly for highly segregated neighborhoods outside of Manhattan;

Require that all MIH options,

Proceedings

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2 regardless of average income level, set --
3 aside a band of 15 percent of units at
4 30 percent AMI level; .

5 Increase the number MIH units to
6 serve the range of diverse neighborhood
7 needs;

8 Include options that provide a
9 varied range of very low income and very
10 moderate, middle income in a single
11 option;

12 Require that off-site MIH
13 developments set aside an additional 10
14 percent of affordable units above the
15 on-site requirement.

16 Thank you very much for your
17 time.

18 THE CHAIRPERSON: Thank you very
19 much, Mr. Burns. Are you going to submit
20 that testimony to us?

21 MR. BURNS: Yes.

22 THE CHAIRPERSON: Thank you very
23 much.

24 Are there questions?

25 Ms. Ortiz.

1 Proceedings

2 COMMR. ORTIZ: Hi, how are you?

3 MR. BURNS: Hello.

4 COMMR. ORTIZ: As a member of
5 the New York Chapter of APA and an Urban
6 Planner, thank you for your testimony.

7 MR. BURNS: Thank you.

8 COMMR. ORTIZ: You know, you
9 mentioned, and this is something we've
10 heard before this, the concern about a
11 one-size-fits-all approach. We have also
12 heard that, you know, there's a risk with
13 not taking action, in that, you know, the
14 time, with respect to seniors in
15 particular, but the time it would take to
16 be able to apply something on a
17 case-by-case basis would leave a whole lot
18 of units on the table.

19 And so I wondered if you had any
20 sort of perspective and if APA had
21 considered sort of what the alternative
22 was other than a one-size-fits-all?
23 Because we have heard today examples, AIA
24 came up to speak and we heard examples of
25 other cities that have applied the

Proceedings

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2 Mandatory Inclusionary, you know,
3 successfully. And if that -- you know, if
4 you could speak to how that played a role
5 in your thinking.

6 MR. BURNS: Well, actually, in
7 truth, I am pinch-hitting so I didn't
8 participate in that, so I don't want to
9 venture a guess.

10 COMMR. ORTIZ: Sorry about that.

11 MR. BURNS: No, no, not a problem.

12 It's actually a great question,
13 it's a great point, good point, and we'd
14 be very happy to come in and talk to City
15 Planning as other groups and continue the
16 discussion, because we believe that
17 something needs to be done.

18 But our concern -- we have a
19 number of concerns. One of them is that,
20 you know, of course the process, we like
21 to see more public process, more
22 involvement with the Community Boards, and
23 I think that's another way to sort of get
24 over the one-size-fits-all because this is
25 a large city. And the zoning resolution

Proceedings

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2 is 54 years old now; it started off, I
3 don't know, I think, less than 500 pages
4 and now it's 1,500 pages. So if putting a
5 one-size-fits-all approach in something
6 that large, you're going get differences,
7 you know.

8 So I don't think there's an easy
9 solution, but I'm commending you for
10 trying and starting the discussion because
11 it's not an easy thing to do.

12 COMMR. ORTIZ: Thank you.

13 THE CHAIRPERSON: Thank you very
14 much.

15 We're now switching to those
16 opposed. The next five speakers are Brian
17 Pressley, Paul Rubenfarb, Steve Perez, Jim
18 Francis, and Norman Frazier.

19 So first, Brian Pressley. Is he
20 here?

21 (No response.)

22 THE CHAIRPERSON: Paul
23 Rubenfarb?

24 Paul Rubenfarb?

25 (No response.)

Proceedings

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THE CHAIRPERSON: Steve Perez?

(No response.)

THE CHAIRPERSON: Jim Francis?

Jim Francis?

(No response.)

THE CHAIRPERSON: Is there --

no.

Norman Frazier?

(No response.)

THE CHAIRPERSON: Okay, going

back to those in favor, Indira Prasad -- I

should say the next five, Indira Prasad,

Simon Bacchus, Mark Willis, Alan

Washington, Robin Pagliuco, I think, and

those that's numbers 51 through 55.

MS. PRASAD: Good afternoon. My

name is Indira Prasad. I'm a member and a

volunteer yoga teacher at the Self-Help

Innovative Senior Center located in

Flushing, Queens. I'm here today to

testify from my personal experiences of

how difficult it is to obtain an

affordable senior housing apartment.

I live on a fixed income of

Proceedings

1
2 \$776. I pay \$508 a month to live in a
3 basement, which is dark and often cold.
4 I'm afraid to complain to my landlord
5 because if she throws me out, where else
6 will I go?

7 I initially placed an
8 application with NYCHA in April 2012. I
9 did not hear anything from them. I went
10 to the NYCHA office in Queens in April of
11 2015. I was told I had to reapply and
12 then call or write every six months to say
13 that I am still interested. I am also
14 told that NYCHA has no available housing
15 right now and the waiting list is very
16 long.

17 My self-help social worker is
18 planning to help me apply for Self-Help
19 Section 8 Housing when applications open
20 in January 2016. At that point, if I'm
21 lucky, my name can be picked in the
22 lottery. But there are still many people
23 waiting, so most of us will have to
24 continue waiting.

25 I feel my hopes and dreams have

Proceedings

1
2 been shattered over and over due to the
3 rejection of endless waiting. I was told
4 by some elderly friends, who are in a
5 similar situation to mine, that they've
6 waited ten years or longer for an opening
7 with NYCHA. Other seniors have told me
8 that it's a waste of time to apply and
9 reapply because by the time NYCHA has an
10 apartment for you, you're either in a
11 nursing home or have died.

12 I am not the worst-case
13 scenario, some of my friends live in even
14 worse conditions than I do. It looks like
15 a hopeless situation for seniors like me
16 who have no stable place to live or
17 support. However, I still have to try
18 since there isn't any other choice;
19 otherwise, I will be homeless if the
20 landlady decide to sell the house and
21 evict me. I often question, why do I have
22 to go through such a struggle and hardship
23 after I have worked hard all my life?

24 I've proudly called America my
25 country for the past 36 years, even though

Proceedings

1
2 I cannot live comfortably in my old age.
3 We senior citizens deserve and demand
4 better living conditions with affordable
5 housing. Here, I'm asking the City
6 Council members and the Mayor to
7 understand where and how we live, so that
8 you can realize the current housing crisis
9 we are facing. Please help us by building
10 more affordable senior housing. Thank
11 you.

12 COMMR. KNUCKLES: Thank you,
13 Ms. Prasad.

14 Questions?

15 COMMR. DE LA UZ: Thank you for
16 being here.

17 THE CHAIRPERSON: The next
18 speaker is Simon Bacchus from The Arker
19 Companies.

20 MR. BACCHUS: Good afternoon.
21 My name is Simon Bacchus and I'm the
22 Director of Development at The Arker
23 Companies. Thank you for this opportunity
24 to testify today in support of the
25 proposed Zoning for Quality and

Proceedings

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2 Affordability and Mandatory Inclusionary
3 Housing text amendments.

4 The Arker Companies has
5 developed over 6,000 units of affordable
6 housing across the city. From Staten
7 Island to the Bronx, we are proud of our
8 reputation as the leading affordable
9 housing developer in New York City, and
10 we're committed to manning our leadership
11 in building safe, quality, affordable
12 housing for all New Yorkers in the face of
13 an ongoing housing crisis.

14 As more New Yorkers struggle to
15 pay rent and the senior housing population
16 continues to rise, developers need more
17 flexible and accessible tools to build
18 more affordable housing. ZQA is an
19 effective way to create modern, affordable
20 units across the City. We support ZQA and
21 believe that modernizing the City's zoning
22 regulations will enable us to further
23 contribute to the Administration's
24 affordable housing goals. By updating
25 these regulations, Arker and other

Proceedings

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2 developers will be able to construct
3 buildings that are both better designed
4 and a better fit for each unique
5 neighborhood in which we build.

6 The ZQA will modernize the
7 permitted shape of buildings, allow
8 developers to build better and more
9 efficiently designed units, and ultimately
10 maximize the number of affordable units
11 built. ZQA will allow for modest
12 additional height limits, while limiting
13 numbers of stories. This means that
14 buildings will receive more generous
15 floor-to-floor heights, providing more
16 comfortable living spaces for residents of
17 all income levels.

18 An important aspect of ZQA is
19 the reduction of parking requirements. We
20 have buildings in numerous communities,
21 some in traditionally transit-challenged
22 areas. Unfortunately, we find our parking
23 lots are almost universally underutilized.
24 For example, we recently developed an
25 affordable senior housing project in

Proceedings

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2 Richmond Hill, Queens, where parking
3 requirements under current zoning
4 requirements actually required us to
5 construct underground -- an underground
6 parking space, which was tough and
7 significantly expensive for the project.
8 Today we've never leased more than
9 25 percent of those spaces.

10 Currently we are under
11 construction in another senior affordable
12 housing project, 100 percent affordable
13 for seniors, in Far Rockaway. The parking
14 requirements for residents will actually
15 require us to incorporate stackable
16 parking, which is another significant
17 expense to the project and, which based on
18 previous experience, we, you know, expect
19 the stackables to be completely
20 unutilized. By reducing these
21 requirements, ZQA will open up a wider
22 array of new sites for senior housing
23 development and direct affordable housing
24 resources where they need it most; the
25 creation of affordable units rather than

Proceedings

1
2 in parking spaces.

3 Mandatory Inclusionary Housing
4 will be another important step forward in
5 accomplishing the City's affordable
6 housing goals. We support MIH because it
7 will provide an effective new way to
8 leverage the creation of affordable units
9 alongside new market-rate housing. It
10 will also help New Yorkers by providing
11 housing across a wide spectrum of income
12 levels.

13 I would like to just echo what
14 Adam was saying earlier, that 60-to-90 AMI
15 range is a really, really difficult income
16 range to serve given the current financial
17 structures.

18 We are confident that both ZQA
19 and MIH will help combat the housing
20 crisis and make New York City a more
21 affordable place to live. We're hopeful
22 that both of these text amendments will
23 pass in order to utilize the new
24 regulations to provide much needed senior
25 and affordable housing and better

Proceedings

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2 buildings across the City.

3 Thank you.

4 THE CHAIRPERSON: Thank you,
5 Mr. Bacchus.

6 Questions?

7 (No response.)

8 THE CHAIRPERSON: Thank you.

9 Next speaker is Mark Willis.

10 MR. WILLIS: I had "good
11 morning" but I guess it's good afternoon.

12 (Laughter.)

13 THE CHAIRPERSON: It's almost
14 good evening.

15 MR. WILLIS. Right.

16 Chair Weisbrod and
17 Commissioners, thank you for the
18 opportunity to testify today. My name is
19 Mark Willis, and I'm the Executive
20 Director of the Furman Center for Real
21 Estate and Urban Policy at New York
22 University. As you know, the Furman
23 Center is a joint-research center of the
24 law school and the Robert Wagner School of
25 Public Service, and our work at the Furman

Proceedings

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2 Center is devoted to examining the public
3 aspect -- public policy aspects of
4 land-use, real estate, development, and
5 housing.

6 We are not here to take a
7 position, but really just share our
8 research findings relevant to the two
9 zoning proposals now under consideration.
10 I've attached to my testimony two policy
11 briefs to consider how Mandatory
12 Inclusionary Zoning and parking
13 requirements might affect the production
14 of housing, and affordable housing, most
15 specifically, in the City.

16 The demand to live in the City
17 has never been stronger, you've heard that
18 from many people before, but we obviously
19 can document that in many ways from
20 households, I would add, at all income
21 levels but, as we know, the supply of
22 housing is not keeping up.

23 So let me share our learnings
24 regarding inclusionary zoning in this
25 context. We hope that our analysis

Proceedings

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2 provides a financial context to understand
3 how Mandatory Inclusionary can create
4 affordable units by harnessing market-rate
5 development without dampening the rate of
6 investments in new residential buildings.
7 We appreciate the Commission must also
8 consider legal parameters, planning
9 principles, and the community input.

10 The goal of inclusionary zoning
11 is to have market-rate units
12 cross-subsidize the development of
13 affordable units. With such a program,
14 affordable units are automatically created
15 as long as market-rate development
16 continues without the need for any direct
17 expenditures of City-subsidy dollars.
18 With this proposal, the City seeks to
19 create a template for implementing
20 Mandatory Inclusionary Zoning where
21 rezonings create substantial additional
22 residential zoning capacity. Because the
23 City contains a wide range of market
24 types, designing such a program that can
25 work citywide is admittedly complex. If

Proceedings

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2 the City wants to encourage continued
3 development of both market-rate and
4 affordable units, it must consider how
5 it's policy may influence the choices the
6 developers and landowners make.

7 For our analysis, we looked to
8 see how increased density could be used to
9 subsidize affordable units without
10 dampening supply. Based on assumptions of
11 construction and operating costs in
12 existence with property tax exemption
13 under 421-a, we found that in
14 neighborhoods where rents are high enough
15 to support new mid- or high-rise
16 development, additional density alone can
17 create a cross-subsidy that both supports
18 the creation of some affordable units,
19 while still allowing developers to earn
20 what we understand to be a commonly
21 expected return.

22 In much of the City, however,
23 rents are not high enough to spur a mid-
24 or high-rise development in the first
25 place, even if land price were zero.

Proceedings

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2 Adding additional density alone will not
3 spur development in these neighborhoods,
4 and so, development in these areas will
5 need to be subsidized.

6 In summary, combining increased
7 density with Mandatory Inclusionary Zoning
8 can work to support the building of both
9 market-rate development and affordable
10 housing without the need for any
11 additional government subsidy. The
12 challenge for you all is to do it so as
13 though not suppress development.

14 The second area of research I
15 want to share is our work on the effects
16 of parking requirements on the affordable
17 housing that the City can develop. As I'm
18 sure you understand, providing parking
19 facilities increases overall construction
20 costs and so, in effect, increases the
21 cost of each unit built. Our research
22 found that the City's parking requirements
23 can cause developers to build more parking
24 spaces than if they were simply meeting
25 demand. Reducing parking requirements for

Proceedings

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2 affordable units near transit, as ZQA
3 proposes, could better align the number of
4 spaces provided with a need for parking.

5 The resulting reduction in the
6 cost of building affordable units would
7 allow the City to stretch it's subsidy
8 dollars further and support the production
9 of more affordable housing or target lower
10 income households.

11 Thank you for the opportunity to
12 testify.

13 THE CHAIRPERSON: Thank you,
14 Mr. Willis.

15 Questions for Mr. Willis?

16 Ms. Ortiz.

17 COMMR. ORTIZ: Hi. Thank you
18 for your testimony.

19 MR. WILLIS: Thank you.

20 COMMR. ORTIZ: You know, you
21 mentioned that in a number of markets,
22 rents simply are not high enough to
23 support, you know, set-aside, and in your
24 report you mention that a number of the
25 areas that are under consideration right

Proceedings

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2 now for rezoning that the rents are fairly
3 low. I think two -- what is it, at least
4 two of the neighborhoods -- or only two of
5 the neighborhoods. Of the six
6 neighborhoods subject to Mandatory
7 Inclusionary at least two have rents high
8 enough, which means the other four don't
9 and they require subsidy.

10 So I guess that leads me to the
11 question, one of the concerns we've heard
12 is that this proj- -- you know, this
13 rezoning and MIH is going to result in,
14 you know, lots of housing built that
15 includes affordable units that are not
16 affordable to people in those
17 neighborhoods. But what you're actually
18 saying is that we're not going to get any
19 housing built in these neighborhoods under
20 current market conditions absent subsidies
21 that, right now, actually support deeper
22 levels of affordability.

23 Is that like the right
24 take-away?

25 MR. WILLIS: I'm not sure where

Proceedings

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2 the six neighborhoods came from. We
3 looked at four, but whatever, there are
4 lots of neighborhoods, the principal is
5 absolutely right, where rents are not high
6 enough for you to have any construction.
7 You're not seeing market-rate, mid-rise or
8 high-rise development in those
9 neighborhoods. So whatever you do to add
10 density, obviously, isn't going to change
11 the economics that don't work there.

12 So then the question is, you're
13 going to have to subsidize the difference
14 between that rent that you need to make
15 the market work, so to speak, and the
16 actual market rent. Whether you want to
17 subsidize down even lower than that,
18 that's the City's option, and I've heard
19 discussions that those ideas are being
20 explored.

21 But my recollection is around
22 \$2,600 a month rent is probably what you
23 need to spur development. So you could
24 have all the units at that or you could
25 subsidize. You know, if a market is a

Proceedings

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2 \$2,300 then you could, you know -- let's
3 be more realistic, \$1,500 or something
4 like that, then you could have all the
5 units at \$1,500 and then you have to
6 subsidize the difference up to the \$2,600.
7 If you wanted some to be at \$1,000, then
8 you have to put in more subsidy or some
9 units that are above.

10 You have to have subsidy, but
11 it's still the decision as to what level
12 you want to subsidize it down to.

13 COMMR. ORTIZ: Okay, thank you.

14 MR. WILLIS: Right.

15 THE CHAIRPERSON: Ms. De La Uz
16 and then Ms. Efron.

17 COMMR. DE LA UZ: Mark, first
18 thank you for being here and thank you for
19 sharing the research that you're handing
20 in with your testimony and for all the
21 work the Furman Center does.

22 Given what you just said, you
23 know, and I think we know about the cost
24 of providing affordable housing in New
25 York City, I think it really raises the

Proceedings

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2 question about the balance of the
3 neighborhoods that the Administration is
4 going to be looking at to -- for the
5 rezonings as part of moving forward with
6 MIH. And I'm just wondering if you have
7 any thoughts you want to share on that?

8 And I think it also raises
9 questions about, you know, obviously under
10 the previous administration there were
11 many, many, many neighborhoods that were
12 rezoned, many of which probably could have
13 produced the kind of value and
14 cross-subsidy that we're talking about
15 here, and I'm wondering if you could -- I
16 know Furman has done some research
17 specific to the voluntary program.

18 MR. WILLIS: Right.

19 COMMR. De La Uz: If you want to
20 share any of that, that would be helpful.

21 MR. WILLIS: So you've raised a
22 number of issues here. I think the
23 previous zoning did not add very much FAR
24 to the -- for residential development and
25 that may have been a missed opportunity,

Proceedings

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2 as well as some of that was in areas where
3 included, at least today, the rents are
4 high enough to cross-subsidize.

5 What the right level of
6 affordability, I don't think we're in
7 position to say. I think that's the
8 decision for you all to make. Obviously
9 we publish a lot of data that tells you
10 what the average incomes are in a
11 community at the current time and what the
12 average rents are.

13 But weighing all these factors
14 that you have to weigh here -- and also,
15 you know, I might add that for better or
16 worse these rents are going to change over
17 time and so locking in rents may in and of
18 itself, for the part that's affordable,
19 making them permanently affordable may
20 have some value as we go forward.

21 THE CHAIRPERSON: Ms. Ortiz.

22 Ms. Efron's question has been
23 answered.

24 COMMR. ORTIZ: Oh, okay.

25 Another follow-up question. I'm

Proceedings

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2 wondering what the research that you've
3 done suggests with respect to the
4 likelihood that in these low-market
5 neighborhoods we'll see a lot of clearing
6 out of existing buildings and
7 redevelopment. It seems that if you have
8 a building that's constructed and
9 cash-flowing right now and if, you know,
10 it's going to be -- you know, the rents
11 weren't quite high enough to support new
12 construction anyway, that we're likely to
13 see a lot of direct displacement as a
14 result of this, is that -- what are your
15 thoughts on that?

16 MR. WILLIS: I did mention that
17 we've attached to our testimony the two
18 briefs if I could --

19 COMMR. ORTIZ: And I appreciate
20 that that's where some of the questions
21 are coming from.

22 MR. WILLIS: Thank you to
23 referring to them so I wanted to come back
24 to that --

25 So you use the word

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"displacement" and that's --

COMMR. ORTIZ: Direct

displacement.

MR. WILLIS: Right. So we have rent regulation, right, and direct displacement in terms of harassment, I think has been discussed earlier today.

If you're asking me whether the pressure on rents is likely to increase, you know, I've been around a long time. I worked at HPD when Koch started the ten-year housing plan, and we were worried about whether neighborhoods would disappear.

This is not our problem today. I give that contrast because the demand here; everybody wants to come here, whether it's immigrants or the very wealthy, and the pressure on our housing stock is going to continue to be very high, particularly with the projections of increase in population.

So if you're asking whether the market is going to keep pushing up rents

Proceedings

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2 across the City, that seems to be the
3 clear trend, you know, and for that to
4 stop, something pretty dramatic, at least
5 in the short-run, would have to happen at
6 the national level or here in the City.

7 So I think that's a reality, and
8 as I implied here, increasing supply is
9 something that we need to keep a focus on.
10 To stop housing production at this point
11 in any way probably means that rents are
12 going to go up even higher than they would
13 otherwise go up.

14 Is that responsive?

15 COMMR. ORTIZ: Yes, thank you.

16 THE CHAIRPERSON: Any other
17 questions for Mr. Willis?

18 (No response.)

19 THE CHAIRPERSON: Thank you very
20 much, Mr. Willis.

21 MR. WILLIS: Thank you.

22 THE CHAIRPERSON: Next speaker
23 is Alan Washington, Downtown Brooklyn
24 Partnership.

25 MR. WASHINGTON: Good afternoon,

Proceedings

1 Chairman, Vice Chairman, Commissioners.

2 My name is Alan Washington. I'm the

3 Director of Real Estate and Planning at

4 the Downtown Brooklyn Partnership, a

5 not-for-profit economic development

6 organization. And on behalf of DBP, I

7 would like to thank the de Blasio

8 Administration for its work on these two

9 very critical issues and the City Planning

10 Commission for hosting this public hearing

11 today.

12
13 As the Neighborhood Development

14 Organization for Downtown Brooklyn, DBP

15 works to foster the growth of the

16 business, retail, cultural, educational,

17 and residential components of our

18 District. We are particularly keen on

19 making sure the new residential growth

20 occurring in Downtown Brooklyn is

21 available to as many Community Board 2

22 residents as possible. And as such, we

23 support programs that aim to preserve and

24 create affordable housing. In fact, we

25 recently co-led an affordable housing

Proceedings

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2 seminar series in partnership with other
3 not-for-profit and for-profit
4 organizations to help educate our
5 neighbors and spread the word about
6 affordable housing opportunities in
7 Downtown Brooklyn.

8 We set out to reach 650 local
9 residents and ended up connecting with
10 3,500. While this is great news, in terms
11 of the success of the seminar series, the
12 frank reality is that the most recent
13 housing lottery in Downtown Brooklyn,
14 which had 200 affordable homes, received
15 over 89,000 applications. Clearly there
16 is an immediate need for more affordable
17 housing, not just in Downtown Brooklyn but
18 across the entire city. Therefore, we
19 believe the Mayor's proposed Mandatory
20 Inclusionary Housing program will take an
21 important step towards creating more
22 opportunities for New York City residents.

23 While there's some disagreement
24 about what the final AMI band should be,
25 and further discussions with the

Proceedings

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2 development community may be necessary to
3 ensure the market fundamentals are in
4 place to achieve the desired goal, we
5 strongly support the program and believe
6 it will make our city a much better place.
7 The program is forward thinking and
8 aggressive, specifically as it relates to
9 permanent affordability while at the same
10 time recognizing the importance of
11 partnering with the private real estate
12 community to achieve ultimate success.

13 We also support the proposed
14 Zoning for Quality and Affordability text
15 amendment, which will provide a more
16 efficient pathway to create affordable
17 senior housing facilities and inclusionary
18 housing projects, and in the process
19 create more inviting streets for
20 pedestrians, which in our experience is a
21 critical component of any successful
22 neighborhood.

23 We look forward to seeing these
24 two proposals implemented and we offer our
25 support in the ongoing process.

Proceedings

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2 Thank you again for the
3 opportunity to speak today and Happy
4 Holidays.

5 THE CHAIRPERSON: Thank you,
6 Mr. Washington, same to you.

7 Any questions?

8 (No response.)

9 THE CHAIRPERSON: Thank you.

10 Next speaker is Robin Pagliuco.
11 Am I pronouncing that correctly? Where is
12 Robin Pagliuco?

13 (No response.)

14 THE CHAIRPERSON: Not here,
15 okay.

16 We're going to go five in
17 opposition, Amelia Barnes, Brian
18 Ellis-Gibbs, Pastor James Osei-Kofi,
19 Maxine Zeifman and Sharon Hayes.

20 So first Amelia Barnes. Here?

21 MS. BARNES: Yes.

22 THE CHAIRPERSON: Okay.

23 MS. BARNES: First, I'd like to
24 say good afternoon to all.

25 THE CHAIRPERSON: Good afternoon

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to you and thanks for your patience.

MS. BARNES: Yeah.

(Laughter.)

MS. BARNES: For everybody.

(Laughter.)

MS. BARNES: My name is Amelia Barnes, and I am a member of Christ Temple. I'm also involved with Faith in New York and Community Voices Heard. My concern -- and I'm also a part of the Real Affordability For All Coalition.

My concern is about the affordability and why I'm concerned about the MIH, because the current level for the MIH group of incomes is above the average for most of us in Manhat- -- in New York. I understand that they've included Westchester and Long Island, which does not encompass the area for New York City. So with the proposals for the housings for the A- -- under the AMI, it doesn't include anybody that's under \$40,000 or it doesn't give you enough placement for those under the \$40,000, and I think

Proceedings

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2 that's going to -- this rezoning is
3 dezoning most of New Yorkers.

4 I don't understand you wanting
5 to make space for those to come in and not
6 make continued space for those who've
7 lived here all their lives. I am one of
8 those who was born and raised here and I
9 am having difficulty living in New York
10 City. And I'm a Registered Nurse, but
11 right now I'm on disability. But other
12 people who have lived here all their
13 lives, have had minimal jobs or, you know
14 minimal incomes, and they are struggling
15 to make ends meet. I've listened to other
16 people talk about New York City Housing,
17 that's a wasted effort because the length
18 of time you're waiting for housing in that
19 criteria.

20 The buildings that I grew up
21 around, and when it was spoken on about it
22 being sacred -- I mean, scared and -- what
23 was the word that was used? It was scared
24 and -- the other word I'm trying to find.
25 I apologize.

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But the territory was difficult in that it was a lot of abandoned buildings and it was used for drug dens, and then they fixed it up and now it's -- I mean, I've lived on the East Side, I've lived on the west side, and I've been able to walk around between both areas daily, and I've seen how things have changed. Unfortunately it's changed where it's not affordable for most people here in New York City.

There are a lot of other areas that are also abandoned and I'm afraid that when they fix them up, they will also not be available for lower- or middle-income people. So what it looks like is like most of the people who have lived here will not be able to continue to live here, and that's a concern for those who have been here all their lives, including myself.

I'm also concerned because I'm hearing a lot of development and I'm wondering about the congestion that you're

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2 going have here in the City, about
3 electricity, because we have problems
4 with, you know, losing power, and with all
5 the rezoning and all the building up that
6 you're all talking about doing, how are
7 you going to be able to manage that with
8 larger volumes of people in the area?

9 Also the schooling, because you
10 have a lot of crowded schools, and I've
11 seen a lot of schools that have already
12 closed. So how are you encompassing all
13 these other areas that have not been
14 addressed?

15 I've heard from people who have
16 talked about how they've been encouraged
17 to leave New York City because it's
18 cheaper to live elsewhere. That works if
19 you have your own means of transportation.
20 Because New York City is the "City that
21 never sleeps," so you can find
22 transportation 24 hours a day, 7 days a
23 week. But if you're not in New York City
24 alone, you cannot get around after nine,
25 ten o'clock at night if you don't have

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your own mode of transportation. Okay.

THE CHAIRPERSON: Thank you,
Ms. Barnes.

MS. BARNES: I just want
everybody to consider these aspects about
living in New York City and asking people
to leave because they can't afford to live
here.

THE CHAIRPERSON: Thank you.

MS. BARNES: Okay.

(Applause.)

THE CHAIRPERSON: The next
speaker is Brian Ellis-Gibbs. Brian
Ellis-Gibbs?

(No response.)

THE CHAIRPERSON: Next speaker
is Pastor James Osei-Kofi.

AUDIENCE SPEAKER: We've heard
from him.

THE CHAIRPERSON: We heard from
him? Okay.

Maxine Zeifman?

(No response.)

THE CHAIRPERSON: Sharon Hayes?

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(No response.)

THE CHAIRPERSON: Going back to those in favor, the next five speakers are Edward Ubiera, Angela Pinsley, Mike Slattery, Kathy Wylde, and Fatima Fernandez.

Edward Ubiera?

MR. UBIERA: Thank you, Chairman Weisbrod and members of the Commission for the opportunity to speak here today. My name is Edward Ubiera. I'm the Director of Policy for the Local Initiative Support Corporation's New York City program.

Over the last 35 years, LISC New York City and its affiliates has invested over \$2 billion leveraging \$5 billion in New York City neighborhoods. This has resulted in 36,000 units of affordable housing and over 2 million square feet of retail and community space.

In partnership with local CDCs, the preservation and development of affordable housing has been and continues to be at the core of our work. Our

Proceedings

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2 platform of technical assistance and
3 lending products and our role as a thought
4 partner with local government stakeholders
5 were key in providing CDCs the tools and
6 capacity needed to transform neighborhoods
7 during an era of disinvestment and
8 abandonment. However, as we all know,
9 we're facing a different set of problems
10 today stemming from a crisis in
11 affordability and supply.

12 LISC believes that the citywide
13 Zoning for Quality and Affordability
14 proposal is a thoughtful and modest
15 framework that will make it possible for
16 mission-oriented developers to design and
17 build more attractive, and most
18 importantly, more affordable housing. By
19 our analysis, when approved and
20 implemented, ZQA will not comprise the
21 character of the liveable mixed-use and
22 contextually zoned neighborhoods that
23 we've grown to love. We agree with the
24 core elements of the proposal that will
25 modernize design guidelines and allow for

Proceedings

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2 increased density, density for affordable
3 and senior housing.

4 For years our partner CDCs have
5 faced many challenges in applying the
6 current zoning rules to their affordable
7 housing projects. ZQA offers commonsense
8 changes that will make it easier to design
9 and build on regular sites without having
10 to get special approvals associated with
11 the extra time and cost. Also, the
12 addition to the height on the ground
13 floors will facilitate the development of
14 more viable commercial spaces, especially
15 for the mom-and-pop stores that add street
16 vitality.

17 We understand that much of the
18 opposition to ZQA has come from advocates
19 which are concerned about the changes to
20 parking requirements. However, we urge
21 you to weigh the feedback coming from the
22 affordable housing practitioners, who know
23 the issues very well. We support ZQA
24 provision that makes parking requirements
25 optional for new and affordable senior

Proceedings

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2 housing, and we also believe it makes
3 sense to allow existing senior housing
4 developments with underutilized parking
5 spots to convert them to either additional
6 housing, open space, or other community
7 amenities. Parking spaces are expensive
8 and especially difficult to justify given
9 the low levels of auto ownership by many
10 residents of senior housing and affordable
11 housing.

12 We urge the City to make sure
13 that public transport in the designated
14 transit zones is sufficient when
15 additional units are added to a
16 neighborhood. CDCs who build housing
17 understand the transportation needs of
18 their neighborhoods, and we're confident
19 that they'll be able to weigh these needs
20 as they make decision choices with the
21 additional flexibility of ZQA.

22 A few words on MIH. A key
23 element of the housing plan is the
24 proposal to establish a Mandatory
25 Inclusionary Housing policy, the first

Proceedings

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2 ever in New York City. In concept, we're
3 supportive of policy efforts like MIH that
4 seek to increase the supply of affordable
5 housing and harness market forces. Since
6 MIH was proposed in September 2015, we
7 have been in regular contact with our key
8 CDC partners who are on the front lines of
9 the housing crisis.

10 As this Commission is aware,
11 their concerns revolve around the knotty
12 issues of affordability, speculation,
13 displacement, and harassment.
14 Particularly CDCs are concerned that
15 unlocking land value in rezoned
16 neighborhoods will unintentionally create
17 displacement pressures.

18 We strongly agree with the goal
19 of providing incentives for building
20 housing for a wide range of household
21 incomes in the current proposal. However,
22 we are concerned that the affordability
23 options in MIH may not deliver sufficient
24 benefit to households with the greatest
25 need, namely extremely low and very

Proceedings

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2 low-income households.

3 We urge the Commission to listen
4 carefully to the non-profit community
5 development sector giving feedback to the
6 MIH, particularly those CDCs with a track
7 record in working with the City and
8 partnership to develop and preserve
9 affordable housing.

10 THE CHAIRPERSON: Thank you very
11 much, Mr. Ubiera.

12 Questions?

13 (No response.)

14 THE CHAIRPERSON: Thank you.
15 The next speaker is Angela
16 Pinsley. Angela Pinsley?

17 (No response.)

18 THE CHAIRPERSON: Nope.

19 Next speaker, Mike Slattery.

20 MR. SLATTERY: Good afternoon.
21 I'm Mike Slattery, Real Estate Board of
22 New York, and we're here to support the
23 two zoning proposals, Zoning for Quality
24 and Affordability and Mandatory
25 Inclusionary Housing.

Proceedings

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2 ZQA provides a number of changes
3 that would improve the quality of housing
4 and modestly increase the quantity of
5 affordable housing. Our Zoning Committee
6 comprised of architects, planners,
7 land-use attorneys, and builders,
8 acknowledge that these changes would
9 provide more architecturally interesting
10 buildings, would improve the pedestrian
11 experience on the street, would devote
12 more scarce resources to housing and not
13 parking, which can add significantly to
14 project cost, would improve street-level
15 retail, and agree that these changes would
16 not produce dramatic changes in the
17 development or character of the
18 neighborhood.

19 However, the inability to build
20 the inclusionary housing off-site and
21 utilize the floor area bonus generated and
22 the additional height proposed in ZQA on a
23 contextual site in the same Community
24 Board has limited the opportunity to
25 create more affordable housing.

Proceedings

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2 The MIH Zoning text is a
3 paradigm shift in City land-use policy,
4 and as such we should proceed cautiously.
5 The scope and depth of the market and
6 financial analysis that was done to
7 support the MIH program is comprehensive
8 and detailed. We concur with this general
9 conclusion that the program can support
10 housing production and promote
11 neighborhood economic diversity without
12 having a chilling effect on new
13 production.

14 The threshold question for us
15 with MIH is whether the program makes
16 economic sense as applied to both
17 city-initiated rezonings and private
18 applications. Here are some of our
19 concerns which we think would have an
20 impact, specifically on private
21 applications:

22 Mandating a single option. As
23 with the new 421-a program, Mandatory
24 Inclusionary Housing should permit
25 builders' choices that work best for the

Proceedings

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2 location and current market conditions.
3 These choices can be developed in
4 conjunction with the Commission and the
5 Council, but having choices is critical in
6 these situations.

7 Private applications would not
8 have the bulk increases contained in the
9 City mapping action, and the bulk
10 increases may not be sufficient to offset
11 the economic cost of a single Mandatory
12 Inclusionary Housing option, as determined
13 through the public review process.

14 There is also concern that in
15 some neighborhoods market conditions would
16 support a private rezoning application
17 even if it does not have increase in bulk
18 comparable to a City rezoning. However,
19 in analyzing two primary choices, the
20 slight increase in rent that 30 percent of
21 affordable units cannot be offset by the
22 lost revenue from the lower percentage of
23 market-rate units. Mandating this is the
24 only option for potential required
25 rezonings.

Proceedings

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2 More generally, there's concern
3 that the 30 percent Mandatory Inclusionary
4 Housing option, at an average of
5 80 percent AMI, so significantly
6 diminishes the value of the 30 percent tax
7 exemption benefit that makes that it makes
8 this option problematic.

9 Likewise, there's concern that
10 the public subsidy available to address
11 the financial gap in new housing
12 production in City-owned rezoning areas
13 would not be forthcoming in areas rezoned
14 through private applications because they
15 would be perceived as too marketable.

16 Similarly, in addition to the
17 availability of public subsidy to make
18 projects economically feasible, the
19 program proposes hardship relief at the
20 BSA as another way to mitigate the impact
21 of the mandatory requirement. This could
22 be a more likely approach in these more
23 marketable areas. However, owners are
24 concerned that as the applicant of a
25 rezoning, they may not be approved for

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2 such relief since the hardship could be
3 seen as self-imposed by the rezoning they
4 initiated.

5 A related BSA concerns what is
6 needed to demonstrate hardship.

7 There is also concern about the
8 fixed mandatory affordable housing
9 requirement when a private application
10 advances other planning objectives, such
11 as landmark preservation, theater , and
12 other cultural uses, and transportation
13 improvements.

14 Another practical concern is
15 that there are times when DCP may ask a
16 private applicant to include adjacent
17 properties under the ownership as part of
18 their action. How would this additional
19 cost and responsibility be factored into
20 the affordable requirement?

21 There is also concern that the
22 threshold for projects to satisfy a
23 Mandatory Inclusionary requirement through
24 a payment in fund is too low and should be
25 raised to 50 units or 50,000 square feet.

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We welcome this opportunity to support the Administration's bold and ambitious housing plan. We encourage the Commission to hold firm on the limited height increases in ZQA as a modest and meaningful way to encourage more housing production, and we urge the Commission to ensure that in this mapping action and all private applications subject to MIH, allow to builder to retain the ability to select from a menu of options --

THE CHAIRPERSON: Thank you --

MR. SLATTERY: -- to satisfy the Mandatory Inclusionary requirement.

THE CHAIRPERSON: Thank you, Mr. Slattery.

MR. SLATTERY: I didn't hear the beep, Carl.

THE CHAIRPERSON: Believe me, there was a beep.

(Laughter.)

THE CHAIRPERSON: Questions for Mr. Slattery?

Ms. De La Uz.

Proceedings

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2 COMMR. DE LA UZ: Mr. Slattery,
3 first, thank you for being here. I would
4 just say that you've just put a lot of
5 information in a very short period of
6 time, so I hope that you submit your
7 testimony so that we --

8 MR. SLATTERY: Thank you.

9 COMMR. DE LA UZ: I would like
10 though to unpack one particular piece that
11 you mentioned, if you wouldn't mind.

12 You talked about the 30
13 percent -- in speaking of MIH and talking
14 about the 30 percent option with 80
15 percent AMI, you mentioned, I think, about
16 the interaction with 421-a and that would
17 be problematic.

18 Could you unpack that a little
19 bit for us? That would be very helpful.

20 MR. SLATTERY: Sure. I think
21 the essence of MIH to work is both a large
22 increase in floor area in an area as well
23 as 421-a tax exemption benefit.

24 The 25 percent option in MIH has
25 a 60 percent AMI requirement. The 421-a

Proceedings

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2 option is -- I'm trying to remember -- 10
3 at 40, 10 at 60, and 5 at 130. And I
4 think the average there is around
5 66 percent AMI. On the 421-a Option B,
6 which is the 30 percent, it's 10 at 70 and
7 20 at 130 I believe. The MIH option is
8 80 percent AMI. The average for 421-a
9 would be like 110 percent with the MIH at
10 80 percent. So the gap there is much
11 larger it is on the other option. And at
12 least, as it's been explained to us by
13 some of our members, that gap makes a real
14 difference. And so that some projects
15 could actually work under the 25 percent
16 option; they may not be able to work under
17 the 30 because the 25 percent option will
18 come with tax exempt financing, perhaps
19 low-income tax credits and the like so...

20 THE CHAIRPERSON: Ms. Ortiz.

21 COMMR. ORTIZ: Hi, good
22 afternoon.

23 MR. SLATTERY: Hi.

24 COMMR. ORTIZ: We heard earlier
25 today that perhaps MIH might help

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2 rationalize land values a little bit, and
3 in that, you know, I'm taking this from
4 the Furman report, where they say,
5 "developers will continue to build if
6 they're able to absorb the cost elsewhere
7 by accepting lower financial returns,
8 bidding less for land or construction
9 services." So the idea that potentially
10 MIH might result in some sort of reduction
11 of the value of land because have you to
12 make it up somewhere else, you know, I'm
13 curious what your take on that is, and I'd
14 like to understand how you might connect
15 that back to the BSA variance. Because
16 when land values are really high and
17 someone purchases a piece of land and then
18 all of the sudden including MIH becomes a
19 hardship.

20 MR. SLATTERY: Right.

21 COMMR. ORTIZ: You know, and
22 these things are related, and I wondered
23 what your perspective was on this.

24 MR. SLATTERY: Well, they are
25 related but they're not related as in such

Proceedings

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2 a cause-and-effect way in the real world
3 as they are in theory.

4 For example, yes, in principal
5 if there's greater obligations on the use
6 of that land as a result of rezoning
7 through the MIH requirement, the land
8 value should go down. That's true except
9 that maybe that site that was once in
10 place as a housing site, may not be no
11 longer available. The seller may decide
12 that he's not going to sell at that lower
13 price.

14 So there is a sense in which
15 that requirement may just take the land
16 off the table. And so I think one of the
17 things that in the equation is that we
18 don't have a fixed pool of land that's
19 going for a certain amount and if we
20 change the requirements, that fixed pool
21 stays the same but price goes down. So I
22 think that that analysis may be correct in
23 theory, but I think in practice it's a
24 different situation.

25 COMMR. ORTIZ: And then how does

Proceedings

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2 this play out with the BSA variance? I
3 presume you're in favor of the variance,
4 but, you know, isn't it cyclical?

5 MR. SLATTERY: That's our
6 question, how does it play out with the
7 BSA variance?

8 I think the question would be
9 that you would, I guess, need to
10 demonstrate, one, that you did not create
11 that problem by perhaps paying more for
12 the land than what it originally costs,
13 but that the requirements for MIH are the
14 reason why that site can't be developed in
15 a profitable manner.

16 And I think that's really our
17 concern is how can you demonstrate that?
18 What kind of evidence would be needed to
19 show that the hardship was not one that
20 you created, but rather, was one that was
21 created by the zoning that has been put in
22 place with MIH?

23 COMMR. ORTIZ: Okay, thank you.

24 THE CHAIRPERSON: Any other
25 questions to Mr. Slattery?

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(No response.)

THE CHAIRPERSON: Thank you,
Mr. Slattery.

Next speaker is Kathy Wylde from
Partnership for New York City.

MS. WYLDE: Thank you and good
afternoon. The Partnership for New York
City is an organization of business
leaders and major employers that works
with government, labor, and the non-profit
sector to deal with major challenges
facing the City, including the recurring
challenge of affordable housing.

During the 1980s, the
Partnership sponsored a program with the
City and State that many of you know well
that was the City's largest producer of
affordable housing. At that time the
housing crisis was the result of the loss
of hundreds of thousands of units due to
fire and abandonment, and disinvestment.
It reflected a weak market that could not
support private investment.

Today we have a thriving

Proceedings

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2 residential market but with similar
3 consequences. The vast majority of New
4 Yorkers cannot afford to purchase a home
5 or rent an apartment at market rates. The
6 City tax base is not broad or deep enough
7 to subsidize housing for the 21 percent of
8 the population that lives in poverty or
9 the 47 percent of population that's forced
10 to pay more than a third of their income
11 in housing costs. The City no longer has
12 the inventory of tax-foreclosed properties
13 to contribute to reducing the cost of
14 affordable housing, nor access to
15 sufficient federal funds to support a
16 pipeline of low-income housing production.

17 Zoning actions to increase
18 density and reduce costs are among the
19 only significant tools the City has to
20 induce the development of housing that
21 responds to the needs of our growing
22 population of low, moderate, and
23 middle-income New Yorkers.

24 The Partnership does not agree
25 with all the details of the zoning

Proceedings

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2 proposals before you. Municipal mandates
3 are not popular with the business
4 community, nor do we agree with the social
5 engineering that requires affordable units
6 be located in luxury developments or
7 districts that command the highest market
8 rents, and consequently, we think deprive
9 lower-income communities of some of the
10 subsidies needed to accommodate the
11 weakest markets.

12 Despite these differences, the
13 Partnership strongly supports the zoning
14 proposals before you and urges the
15 Commission and Council to move forward
16 with their approval and to avoid
17 amendments that reduce the City's
18 flexibility and discretion in
19 administering these new tools. Markets
20 change dramatically over the years, as we
21 all know, and the City desperately needs
22 that discretion.

23 The only solution to the
24 affordability crisis in a city that is
25 growing and prospering is more housing,

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2 which means greater height and density,
3 reduced parking and setback requirements,
4 and wide latitude to design and develop
5 properties toward a single goal: The
6 maximum utilization of sites for housing
7 to reach the lowest income households with
8 a minimum commitment of City-funded
9 subsidies, which will always be inadequate
10 to the growing housing needs.

11 The zoning amendments are
12 generally structured to achieve these
13 goals and should be adopted quickly.

14 Thank you.

15 THE CHAIRPERSON: Thank you,
16 Ms. Wylde.

17 Questions?

18 Ms. Efron.

19 COMMR. EFFRON: Thank you. It
20 seems to me there's an economic
21 development argument for more affordable
22 housing, and there are at least rumors
23 that that large businesses haven't
24 relocated to New York because of the lack
25 of a wide range of affordable housing.

Proceedings

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2 Can you give us your experience
3 about opportunities lost by the City with
4 businesses because we haven't had a wide
5 range of affordable housing?

6 MS. WYLDE: Yes. As a matter of
7 fact, I'm not going to mention them, but
8 right now there are a couple of companies
9 negotiating, under discussion with
10 negotiating with locating a large number
11 of jobs here, and retention of jobs, that
12 are directly complaining about the lack of
13 affordable housing. You've got the safety
14 valve of Jersey City building 36,000
15 units, but that's not a very attractive
16 selling point for New York City,
17 especially with the tunnel going under in
18 ten years.

19 So there's a lot of concern in
20 the business community. Also, in the tech
21 community and people talk about the rise
22 of Air B&B. Well Air B&B's rise has been
23 accommodating the young Internet
24 workers that have been attracted or are
25 necessary here to support our fastest

Proceedings

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2 growing industry, and they basically share
3 or let out their apartments as a way to
4 afford to live here. And none of these
5 are the outcomes that we would like to
6 see. We ought to have a city that has
7 some kind of market dynamic, and I think
8 the changes in the zoning code would do
9 that.

10 All of them are really
11 incredibly important to the continued
12 economic growth and job creation in the
13 City.

14 THE CHAIRPERSON: Any other
15 questions for Ms. Wylde?

16 (No response.)

17 THE CHAIRPERSON: I actually do
18 have a question for you that's a little
19 broader with respect to just follow-up on
20 the question Ms. Efron asked, which
21 is the availability of affordable housing
22 in the region and how that, or lack of
23 availability of affordable housing, not
24 only in the City but in the region, and
25 how is that affecting employer decisions

Proceedings

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2 on where their companies locate, either
3 staying here or leaving here?

4 MS. WYLDE: Well, as I say,
5 Jersey has been our safety valve for the
6 last decade in terms of providing a more
7 affordable alternative, particularly for
8 middle-class people, not lower-income
9 people but for middle-class people. But
10 basically our region, especially their
11 real estate taxes, their commuter costs,
12 et cetera is not any more affordable than
13 the City. And so if you're looking for
14 affordable housing on Long Island or in
15 Westchester, good luck.

16 So I think it is a regional
17 problem and I don't think that there is a
18 reasonably priced housing market,
19 certainly for moderate and lower-income
20 households anywhere.

21 And of course the terrible
22 threat of the deterioration of our public
23 housing, which has been our most reliable
24 resource of very low income, is a huge
25 crisis that the federal government has

Proceedings

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2 complete disinterest in. So that's going
3 to be another burden on New York City. So
4 I think it's -- the City is flush right
5 now because we've had a great economy for
6 a few years and the tax rolls are strong,
7 but I think as we look at the choices
8 we're going to have to make over the next
9 few years, that's where this zoning tool
10 really rises as the most important thing
11 we can do to tackle these issues.

12 THE CHAIRPERSON: Thank you very
13 much.

14 Any other questions?

15 (No response.)

16 THE CHAIRPERSON: Thank you very much.

17 MS. WYLDE: Happy Holidays.

18 THE CHAIRPERSON: Same to you.

19 Next speaker is Fatima Fernandez.

20 (No response.)

21 THE CHAIRPERSON: Okay.

22 Switching now to those opposed, the next
23 five speakers are Bernice Swinton, Tiffany
24 Lee, Maya Bhardway, Hilda Regier, and
25 Anita Isola.

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First, Bernice Swinton.

(No response.)

THE CHAIRPERSON: Is she here?

No.

Tiffany Lee? Okay, thank you.

Good afternoon, and again thank you for your patience.

MS. LEE: Oh, thank you, and thank you for your endurance. My name is Tiffany Lee, and I'm a resident of Inwood, and Director of Social Justice Ministry for a Catholic non-profit organization called Centro Altogracia de Fe y Justicia, Altogracia Center for Faith and Justice, that serves and works with the communities of Washington Heights and Inwood, and we're also a member of Faith in New York, and the Real Affordability For All Coalition.

I recognize that this Mandatory Inclusionary Housing intends to address the housing crisis of New York City, while ensuring some measures of protection for -- in terms of quality and

Proceedings

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2 affordability of this new housing, which I
3 appreciate. But the plan worries me as it
4 currently stands in that the two options
5 are based on area median incomes,
6 including New York City Metropolitan area
7 and not northern Manhattan specifically,
8 namely, that the 25 percent of units set
9 aside for those earning 60 percent AMI at
10 \$46,000 or 30 percent of units set aside
11 for those earning up to 80 percent of AMI
12 or \$62,000, are both well above the median
13 household income of our community
14 district, which is \$37,000 a year. And
15 these two options are also exorbitantly
16 higher than the median household income of
17 the parts of Inwood specifically being
18 considered for rezoning, specifically east
19 of Tenth Avenue, which has a median income
20 \$21,000.

21 When the Mayor's plan for
22 affordability relies on these levels of
23 income as high as 46 or 62,000 dollars,
24 and our reality of affordability is based
25 on 37 and 21,000 dollars, there's a major

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2 disconnect and a need to go back to the
3 drawing board and redefine what
4 affordability in this plan actually is.

5 Affordable housing remains the
6 resounding top concern for residents of
7 Inwood and Washington Heights and the
8 community leaders who work hand-in-hand
9 with them. There's an ever-growing
10 demand for housing attorneys and advocates
11 to attend to cases of tenants being abused
12 and pushed out of their homes. Many
13 long-time northern Manhattan residents
14 have already had to relocate due to lack
15 of affordability. There ought to be
16 serious consideration given to preserving
17 the existing units and further protecting
18 these tenants, particularly in the areas
19 being rezoned, from predatory and abusive
20 landlords eager to push them out and make
21 room for the new changes the rezoning will
22 bring. We need these protections before
23 the cases get to eviction proceedings.

24 Envisioning our neighborhoods
25 beyond affordable housing, a high priority

Proceedings

1
2 on our list would also include quality
3 local jobs with decent labor standards,
4 fair wages, apprenticeship, and local
5 employment opportunities.

6 And just regarding the ZQA
7 parking issue, I hadn't intended to
8 address it, but for our uptown
9 neighborhoods the transit system is not
10 ADA accessible in many stations and the
11 bus routes are infrequent and oftentimes
12 too crowded to get on when the bus
13 actually does show up. So I think that
14 that also needs to be included in the
15 conversation.

16 Given this reality of the
17 housing crisis and the disconnect between
18 the proposed plan and reality, it is all
19 the more important to get the details of
20 this plan right to ensure that
21 well-intentioned protections are not only
22 well-intentioned, but also well informed
23 by local data and lived experiences of the
24 rezoned communities.

25 I appreciate the dialogue

Proceedings

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2 involved in this development process and I
3 appreciate the opportunity to express our
4 concerns, but I would urge further
5 consideration into alternative proposals,
6 like the RAFA model, and protections that
7 take the local data into account and
8 better reflect the lived reality of those
9 that the measures aim to protect.

10 I would also encourage broader,
11 more extensive dialogue with those in the
12 community and consideration of the
13 Community Boards input that will effect --
14 of those that this will effect and the
15 slowing down and planning in the decision
16 making process, which seems to be moving
17 too quickly to ensure that all voices are
18 heard.

19 Thank you.

20 THE CHAIRPERSON: Thank you,
21 Ms. Lee.

22 Questions for Ms. Lee?

23 (No response.)

24 THE CHAIRPERSON: Thank you very
25 much.

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Next speaker is Maya Bhardway.

I think she's listed as not going to speak, but just here.

Hilda Reiger? Am I pronouncing that correctly, Reiger?

MS. REIGER: No, it's okay.

MALE VOICE: Cut your losses.

MS. REIGER: Good afternoon, Chairman Weisbrod and Commissioners. I'm Hilda Reiger --

THE CHAIRPERSON: Oh, Reiger, sorry about that.

MS. REIGER: -- President of the Victorian Society - New York.

The Victorian Society in America was founded in 1966 upon the advice of Sir Nikolaus Pevsner to several New Yorkers attending England's Attingham Summer School. He cautioned that the U.S. was in danger of losing it's reminisce of 19th Century architecture. Victorian Society - New York, the founding Chapter of the national organization, works to preserve the architecture of the 19th and early

Proceedings

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2 20th Centuries in the entire city.

3 The proposed Zoning for Quality
4 and Affordability would endanger many of
5 the structures we strive to protect. It
6 would encourage destruction of older
7 structures that show residents and
8 tourists the aesthetic evolution of our
9 streetscapes and neighborhoods. Perhaps
10 more importantly, such destruction would
11 wipe away established affordable housing
12 units. The effect, therefore, would be
13 counterproductive.

14 New York City has developed and
15 evolved over four centuries. Zoning
16 legislation was first enacted in 1916, in
17 large measure to protect light and air.
18 Contextual zoning came into being about
19 1990 to assure that new construction was
20 sympathetic to earlier buildings.

21 The proposed rezoning would
22 permit an important element of contextual
23 zoning to be eliminated by permitting
24 higher structures. Additionally,
25 compromising rear yard requirements would

Proceedings

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2 result in slum con- -- could result in
3 slum conditions like those of more than an
4 century ago that led to the adoption of
5 current standards.

6 The proposal would impact our
7 quality of life by allowing light and air
8 to be blocked and by changing density,
9 making our sidewalks even more crowded.
10 Taller buildings bring added problems.
11 Typically, they require deeper foundations
12 than adjacent smaller buildings and needed
13 underpinning is risky. Shadows cast by
14 tall buildings affect neighboring
15 buildings, people, and trees.

16 Commissioners, please do not be
17 swayed by arguments that a fix here and a
18 patch there will make this a workable
19 plan. Too much is at stake. The best
20 solution is a no vote.

21 And just from what I've been
22 hearing, a personal note, I know it's a
23 zoning issue but it's a city issue, we're
24 losing housing units because buildings
25 that are now four, eight apartments, are

Proceedings

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2 being redeveloped as single-family
3 buildings, and also we have an awful lot
4 of new construction that -- where units
5 have been purchased by people outside of
6 the City and they're not lived in.
7 Something needs to be done about that kind
8 of loss of housing.

9 THE CHAIRPERSON: Thank you.

10 Questions?

11 (Applause.)

12 THE CHAIRPERSON: Thank you very
13 much.

14 Next speaker is Anita Isola.

15 MS. ISOLA: Good afternoon
16 Commissioners. My name is Anita Isola. I
17 serve on the Board of the Greenwich
18 Village Society for Historic Preservation.
19 However, we have our Executive Director
20 and a number of other people from the
21 organization speaking as well, so I'm just
22 speaking on my behalf. I'm sure they'll
23 be more eloquent anyhow.

24 I would not be so callous as to
25 suggest that there isn't a remarkable need

Proceedings

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2 for affordable housing, and I'm very much
3 in favor of that. However, the ZQA plan
4 as it is right now, is not acceptable to
5 me because of what so many other people
6 have said, this one-size-fits-all format.

7 The reason that's problematic,
8 to some extent, is because we all know New
9 York City is comprised of many, many,
10 neighborhoods that are very diverse. They
11 have grown and evolved over many, many
12 years, and they have been preserved as the
13 result of painstaking work of many people
14 that came before me in preservation and in
15 contextual zoning.

16 Specifically, I am thinking of
17 the height limits, the height increases.
18 Now you might say this woman is out of her
19 mind, 25 feet, 50 feet more, what could
20 that do?

21 Well, in certain areas of New
22 York, like Greenwich Village and East
23 Village, the effect of that could be quite
24 devastating to the landscape of a block,
25 and I think you should seriously take that

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into account when you review this plan.

Thank you very much.

(Applause.)

THE CHAIRPERSON: Please. Thank you very much, Ms. Isola.

Questions for Ms. Isola? Don't go so fast.

(No response.)

THE CHAIRPERSON: But no questions. So now you can go, thank you.

Now the next -- we're switching once again to those in favor. The next five speakers, Stanley Morte, Ursula Hernandez, Ian Riley, Jonathan Marvel, and Ajay Pires.

First speaker is Stanley Morte.

(No response.)

THE CHAIRPERSON: No.

Second speaker is Ursula Hernandez. Ms. Hernandez?

(No response.)

THE CHAIRPERSON: Nope.

Next speaker is Ian Riley, New York Building Congress.

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MR. RILEY: Right here.

Hi. My name is Ian Riley. I'm the consultant for the New York Building Congress. This testimony was submitted on behalf of Richard Anderson, the President of the New York Building Congress.

The Building Congress is a diverse industry-wide organization committed to promoting smart development that encourages economic growth and strengthens New York City and the surrounding region.

We support the City's two proposals to amend the zoning text to increase production of affordable housing. In a recent addition of our construction outlook, the Building Congress found that while more money is being spent on residential construction than at any point in decades. This has translated into fewer actual housing units being built. The necessary conclusion is that more money is being spent building higher-end housing and less on affordable housing.

Proceedings

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2 Given the clear need for
3 government intervention in a market that
4 is not producing sufficient affordable
5 housing, the City's Mandatory Inclusionary
6 Housing and the Zoning for Quality and
7 Affordability proposals are necessary
8 responses. These thoughtful proposals
9 drive the building industry toward more
10 affordable housing construction, while at
11 the same time improving the character of
12 the streetscape and interior layouts. In
13 general most as-of-right development can
14 continue unabated. It is only when the
15 City takes further actions to rezone
16 specific parts of the City to increase
17 density that the Mandatory Inclusionary
18 Housing provision is triggered.

19 However, the Building Congress
20 urges careful monitoring of these text
21 amendments and a quick response to any
22 unforeseen consequences that do arise.
23 Overall, the City is taking decisive
24 action to moderate spiraling housing
25 costs, we hope this proposal begins to

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turn the tide.

Thank you for this opportunity
to testify.

THE CHAIRPERSON: Thank you,
Mr. Riley.

Questions?

(No response.)

THE CHAIRPERSON: Thank you.

Next speaker is Jonathan Marvel.

A visual aid, Mr. Marvel.

(Laughter.)

MR. MARVEL: So good afternoon
and thank you for your patience, and for
this ability to have the public testify.

I'm Jonathan Marvel from Marvel
Architects, and I'm here this afternoon
with Ann Kederer, also from Marvel
Architects. And a little background, Ann
is going to read a statement that was
prepared when we held a workshop in my
office about a month-and-a-half ago with a
peer group of other design professionals
and architects here in New York City. We
wanted to analyze and study some of the

Proceedings

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2 benefits from this change, zoning change,
3 and so Ann will be able to give you some
4 of that information.

5 Then I will walk you through a
6 very specific project that we actually
7 have on the boards right now, that I want
8 to just illustrate that point.

9 Thank you.

10 MS. KEDERER: Good afternoon.
11 As an architect who designs affordable
12 housing, I'm here to say that I'm in favor
13 of the ZQA. I'd like to start by
14 addressing the misconception about the
15 proposed height increases in the new text,
16 I'd like to clarify a major point. The
17 increase is not to give more floor area to
18 the developer; rather, the height
19 increases serve to improve the quality of
20 the street life for the passerby, and the
21 interior atmosphere for the tenant.

22 Furthermore, there are actually
23 only two conditions in which a site is
24 given extra height. First, the building
25 has a ground level minimum floor-to-floor

Proceedings

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2 height of 13 feet, which is to encourage
3 better retail at the street and also allow
4 the architect to elevate the apartments at
5 the first floor five feet above the
6 sidewalk level, which would create more
7 security and privacy for the resident.

8 Secondly, the extra height is
9 only given to sites within the
10 Inclusionary Housing zone. Sites in an
11 Inclusionary Housing zone that are
12 building affordable housing are by the
13 current zoning text given a small floor
14 area increase to do so. However, with the
15 height restrictions, as they're currently
16 written, it is often unachievable to use
17 all the floor area without seriously
18 reducing the floor-to-floor height,
19 thereby reducing the quality of the
20 building.

21 With clear floor-to-floor
22 heights of eight feet, there's limited
23 room for lighting, ductwork, and piping
24 that's necessarily for a building and
25 housed within a soffit. Furthermore,

Proceedings

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2 windows are shorter, giving less light and
3 air to the unit.

4 Also quality housing buildings
5 are given floor area deductions for things
6 like laundry rooms with windows in them
7 elevators and corridors with a window,
8 legal window in it, tenant recreation
9 spaces that are indoors, again, with legal
10 windows. Many of these deductions are not
11 achievable without the extra height.

12 So, in conclusion, by increasing
13 the building height, the allowable floor
14 area potential can be reached; thereby,
15 creating more affordable housing
16 throughout the City, but also much nicer
17 buildings.

18 MR. MARVEL: Thank you, Ann.

19 So the illustration here is
20 actually two buildings two blocks away
21 from each other, 909 Atlantic Avenue and
22 1043 Fulton Street, in the -- and this
23 is -- they're both 100 percent affordable
24 housing projects with height limits of
25 80 feet, totaling 135 units within the two

Proceedings

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2 buildings. The 909 Atlantic is --
3 consists of 78 dwellings. We're leaving
4 some FAR on the table because of height
5 limit. So by increasing the height of the
6 building we're able to do a couple of
7 things.

8 One is we're going from an
9 eight-foot clear, ground-floor ceiling
10 height to a nine-foot-four clear
11 ground-floor ceiling height -- sorry, to a
12 twelve-foot-four-inch clear floor height
13 at the ground floor. The units themselves
14 go from eight-feet clear to nine-foot-four
15 clear on the upper floors, and what we're
16 doing here specifically is we're able to
17 put the lounge of the -- for the
18 residents, which is now in the cellar, on
19 the ground floor, plus we're able to add
20 that retail floor -- that retail space
21 onto the ground floor and that's a
22 remarkable difference for the community.
23 And we can do that in both the Atlantic
24 site and the Fulton Street site, and I
25 think that the -- without any real extra

Proceedings

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2 cost for the developer, and I think that's
3 an important point to be made, so that we
4 can really increase the street activity
5 with both the lounge and the retail floor,
6 and not having those darkened apartments,
7 which will have grills on them, they'll
8 have their shades drawn down. So we can
9 have some true participation at the street
10 level by doing this.

11 Thank you very much.

12 THE CHAIRPERSON: Thank you,
13 Mr. Marvel.

14 Questions for Mr. Marvel?

15 (No response.)

16 THE CHAIRPERSON: Thank you very
17 much.

18 MR. MARVEL: Thank you.

19 THE CHAIRPERSON: Next speaker is
20 Ajay Pires, am I pronouncing that
21 correctly? Alloy Development.

22 (No response.)

23 THE CHAIRPERSON: No. Okay.

24 Switching over to those opposed,
25 the next five speakers are Mary Crosby,

Proceedings

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2 Ava Farkas, Andrew Berman, Lauren
3 Snetiker, I think, and Sam Moskowitz.

4 First, Mary Crosby. Mary
5 Crosby?

6 (No response.)

7 THE CHAIRPERSON: Nope.

8 Second, Ava Farkas. Ms. Farkas?
9 Is that Ms. Farkas coming down?

10 MS. FARKAS: Yes.

11 THE CHAIRPERSON: Okay.

12 MS. FARKAS: Don't start the
13 clock yet, hold on.

14 (Laughter.)

15 MS. FARKAS: Hello. Good
16 afternoon-evening, everybody. So my name
17 is Ava Farkas. I'm the Executive Director
18 of the Met Council on Housing. We are a
19 tenant-rights organization, we are a
20 membership organization of tenants. We
21 fight for rent regulation. We fight for
22 rent control. We fight to strengthen
23 those systems on the state level, and we
24 fight for policy on the citywide level
25 that's going to strengthen protections for

Proceedings

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2 tenants to keep New York City
3 neighborhoods affordable, to keep working
4 class New Yorkers here, and to create
5 housing for the people who live here now
6 and who have lived here their whole lives,
7 and who have invested in their
8 communities.

9 Met Council on Housing opposes
10 the City's MIH plans because we do not
11 think it's going to create real affordable
12 housing for the New Yorkers who need it
13 most, we don't think it's going to create
14 good jobs, and we fear that it will lead
15 to displacement of rent-regulated and
16 long-term tenants.

17 The lowest level of
18 affordability in this plan is for
19 households at 60 percent of AMI. This
20 completely ignores half of renter
21 households in New York City that are under
22 50 percent of AMI. The Mayor's own plan
23 lays this out in beautiful graphs and
24 beautiful charts: Half of New York renter
25 households are under 50 percent of AMI,

Proceedings

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2 and they are the most rent-burdened and
3 they are at most in need of affordable
4 housing. So when we talk about affordable
5 housing we have to talk about who is it
6 for, who needs affordable housing in the
7 City; it's people under 50 percent of AMI,
8 which are considered low-income and
9 extremely low-income.

10 So if the lowest level of
11 affordability in this plan starts at 60
12 and goes up to 120, which I would argue is
13 market-rate housing, a rent of \$2,400 a
14 month seems to me to be market-rate
15 housing, it seems absurd that that would
16 be subsidized through additional height
17 and density through this plan. It will
18 create secondary displacement and
19 gentrification.

20 The speculation is that MIH will
21 generate, will create additional
22 gentrification pressures on rent-regulated
23 tenants in the area with the greatest
24 concentration in Manhattan, which is
25 Inwood and Washington Heights. I'm a

Proceedings

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2 resident of Inwood. I'm paying a lot of
3 attention to the Inwood rezoning that's
4 slated. And in Inwood, the average of
5 renter households are at 48 percent of
6 AMI; in East Harlem they're at 37 percent
7 of AMI. So there's no way that the
8 housing created through the MIH options
9 and through the rezonings is going to be
10 available to the people who currently live
11 in the neighborhood.

12 I think that this is
13 unacceptable public policy. Essentially,
14 we're saying that the -- you know, I also
15 wanted to point out another thing in the
16 affordable housing plan. It -- just
17 setting aside what's going to be
18 constructed, when the Mayor also talks
19 about what's going to be preserved, the
20 200,000 units, only 20 percent of those
21 200,000 units are slated for people that
22 are low-income or extremely low-income.
23 So, you know, I think in many ways the
24 plan really is not creating the affordable
25 housing that the people who need

Proceedings

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2 affordable housing can access, and I think
3 that this is unacceptable public policy.

4 So there's a couple of
5 recommendations that we have, and we think
6 that without changing MIH, that it's not a
7 policy worth adopting. We're part of the
8 RAFA Coalition, so we support the concept
9 that there could be greater affordability,
10 deeper levels of affordability, and a
11 greater ratio of affordability in exchange
12 for a higher density bonus, and that the
13 City is giving away some density through
14 the MIH options that could be leveraged
15 for greater affordability.

16 We also think there needs to be
17 job standards in the construction, and we
18 think that Option 3 should be entirely
19 removed as an option in this plan and the
20 MIH plan. It's market-rate housing. It's
21 not affordable housing by any estimation.

22 THE CHAIRPERSON: Thank you,
23 Ms. Farkas.

24 Questions to Ms. Farkas?

25 (No response.)

Proceedings

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2 THE CHAIRPERSON: Thank you very
3 much.

4 Next speaker is Andrew Berman.

5 MR. BERMAN: Good afternoon,
6 Commissioners. I'm Andrew Berman,
7 Executive Director of Greenwich Village
8 Society for Historic Preservation. The
9 largest membership organization in
10 Greenwich Village, the East Village, and
11 NoHo, and several speakers will follow me
12 speaking from the packet distributed.

13 On behalf of our several
14 thousand members, we strongly urge you to
15 vote no on Zoning for Quality and
16 Affordability, which will improve neither
17 quality nor affordability in new
18 construction. What it will do is gut
19 neighborhood zoning protections which
20 often took years to achieve and were the
21 result of considerable consensus building,
22 negotiations, and comprise.

23 The premise of many of ZQA's
24 most basic arguments are flawed or simply
25 false. ZQA claims that New York City

Proceedings

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2 faces a terrible problem of new
3 developments with ground floors of
4 insufficient height, thus requiring an
5 increase in allowable height for
6 market-rate developments of 5 to 20 feet.
7 In fact, a survey we conducted found that
8 by far most new quality housing and
9 contextual zoning buildings in our area
10 already have the ground floor heights ZQA
11 says our existing rules do now allow or
12 could have had them under the existing
13 rules but chose not to.

14 ZQA claims we need to allow
15 market-rate developments to have grand
16 11- or 12-foot floor-to-floor heights and
17 to do so we should lift height limits.
18 But we found most new developments in
19 these districts in our neighborhood either
20 already had those heights or chose
21 slightly shorter ones, even though the
22 existing height limits would have allowed
23 them to go higher. ZQA claims that large
24 height increases are necessary to
25 accommodate new market-rate developments

Proceedings

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2 that will include a fraction of senior
3 affordable housing, which can be phased
4 out after 30 years, but there is no reason
5 why such developments cannot be built
6 within the existing height limits for
7 contextual zones and quality housing.

8 ZQA claims that sliver-law
9 protections and limits on rear yard
10 incursions must be eliminated in order to
11 allow new market-rate developments with 20
12 percent affordable housing to be built,
13 but there's no reason why such
14 developments cannot be built while
15 maintaining these essential protections.

16 ZQA claims existing height
17 limits prevent the voluntary inclusion of
18 20 percent of affordable units in new
19 developments in inclusionary zones, but we
20 found that well more than half of such
21 developments in our neighborhood do
22 include the affordable units with those
23 height limits. And in almost all cases
24 where they don't, the existing height
25 limits left more than enough room for them

Proceedings

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2 to do so.

3 Studies and interviews with
4 developers have shown that bureaucracy,
5 tax incentives for market-rate housing,
6 and the complexity of including affordable
7 units in smaller developments are why
8 developers don't opt into the current
9 voluntary program, none of which would be
10 changed by ZQA.

11 ZQA will do nothing to increase
12 affordability of housing in our city.
13 Making the current voluntary program
14 mandatory might, but not the way MIH
15 works. Making mandatory inclusion of
16 affordable housing contingent upon
17 large-scale upzonings that would vastly
18 increase the production of market-rate
19 housing beyond what is currently allowed
20 would have the overall effect of making
21 neighborhoods and our city less
22 affordable, not more, and it would destroy
23 the scaling character of those
24 neighborhoods in which it is done.

25 These rezoning proposals are a

Proceedings

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2 one-size-fits-all approach that fails to
3 take into account or to analyze local
4 impacts and needs. A much more targeted
5 approach could be taken to address the few
6 legitimate weaknesses in the existing
7 zoning without destroying necessary
8 neighborhood zoning protections and years
9 of hard work. Thus, we urge you to send
10 these proposals back to the drawing board.

11 THE CHAIRPERSON: Thank you,
12 Mr. Berman.

13 (Applause.)

14 THE CHAIRPERSON: Please.
15 Questions for Mr. Berman?

16 (No response.)

17 (Whereupon, Kari L. Reed
18 replaces Nicole Ellis as hearing
19 reporter.)

20 THE CHAIRPERSON: The next
21 speaker is Lauren Snetiker. Is that
22 right?

23 MS. SNETIKER: Yes.

24 I'm speaking on behalf of GVSHP
25 also.

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THE CHAIRPERSON: I'm sorry?

MS. SNETIKER: GVSHP, Greenwich Village Society for Historic Preservation.

THE CHAIRPERSON: Got it.

MS. SNETIKER: ZQA proposes to increase height limits under a variety of circumstances for purely market rate housing five to ten feet in contextual zones, and up to 20 feet for quality housing. We believe this is absolutely wrong and should not be approved.

Department of City Planning originally stated that such changes were necessary to allow market rate developments to utilize their full allowable FAR. However, ensuring that every development achieves the maximum theoretically allowable FAR is not the job of zoning, which is also intended to protect light and air, and establish appropriate scale for new development.

That aside, we found no cases of new market rate developments in our neighborhood in contextual zones which

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were unable to utilize their full FAR as a result of contextual height limits, even though DCP claims that the R7A and R8A districts we have are particularly onerous in this regard. Quite to the contrary, we found several examples of market rate developments in existing contextual zones which utilize full allowable FAR, and even left allowable height on the table, thus showing the existing height limits in no way impede maximum allowable development.

Now DCP says height increases for market rate developments are necessary to ensure that we don't have inadequately scaled ground floors in new contextual developments which it defines as less than 13.5 feet. Here again, DCP's logic and data are faulty. We found that many of the new developments in our contextual zones already have 13.5 foot ground floors, and existing height limits rarely, if ever, prevent new developments from having them. Under ZQA they would simply be allowed to grow an additional five feet

Proceedings

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2 or more in height with no additional
3 public benefit. In many other cases we
4 found developers chose to have 10-, 11- or
5 12-foot tall ground floors even though
6 existing height limits would have allowed
7 them to go higher, thus making ZQA's
8 argument for the pressing need to gut our
9 height limits to encourage taller ground
10 floors particularly spurious.

11 Why undo years of hard work and
12 thoughtful deliberation to ensure that
13 every building has a 13.5 foot ground
14 floor? Not only do many of our older and
15 newer buildings have slightly shorter
16 ground floor heights, but in many cases
17 that is actually more desirable or
18 appropriate. Retail should have a
19 neighborhood scale and feel, such as 11-
20 or 12-foot ground floors. Regardless, we
21 are justifying single developments in a
22 contextual zone with an 8.5 foot ground
23 floor. So even if one accepts DPC's
24 premise that 13.5 foot ground floors must
25 be incentivized by the zoning, raising

Proceedings

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2 height limits by five feet or more to try
3 to ensure this outcome is totally
4 unnecessary and makes absolutely no sense.

5 ZQA also proposes to allow
6 greater flexibility in the setback
7 requirements for buildings in contextual
8 districts. We question whether such
9 changes are necessary. But one thing is
10 clear: Increasing the allowable height of
11 new buildings to accommodate such
12 increased flexibility is neither worth the
13 trade off nor necessary.

14 In recent conversations, DCP has
15 admitted that the proposed height
16 increases for market rate developments are
17 not needed to allow greater flexibility in
18 facade depths or setbacks, since ZQA also
19 allows lesser setbacks at the upper levels
20 of new developments to compensate for the
21 greater setbacks it would allow at the
22 base.

23 For all these reasons, we
24 strongly urge you to disapprove of any of
25 the proposed height increases for market

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rate developments.

THE CHAIRPERSON: Thank you,
Ms. Snetiker.

Questions?

(No response.)

THE CHAIRPERSON: Thank you.
Are you going to submit that testimony?

MS. SNETIKER: It's part of your
packet.

THE CHAIRPERSON: Okay, great.
Thank you.

(Applause.)

THE CHAIRPERSON: The next
speaker is Sam Moskowitz.

MR. MOSKOWITZ: Thank you. My
name is Sam Moskowitz, and I'm continuing
the testimony of the Greenwich Village
Society for Historic Preservation.

ZQA proposes to increase height
limits for inclusionary developments which
contain 20 percent affordable housing by
up to 25 feet or more, up to 31 percent, a
very significant increase. The premise is
current contextual height limits prevent

Proceedings

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2 the inclusion of additional affordable
3 housing, and lifting the height limits
4 will result in more affordable housing
5 units being built. But all evidence
6 indicates the height limits are not an
7 impediment, and lifting them will not
8 result in A single additional unit of
9 affordable housing being built. It would
10 simply allow some developments, which
11 would have been built anyway, to increase
12 their height significantly.

13 According to a 2013 City Council
14 study, about 13 percent of all new units
15 built in inclusionary zones were
16 affordable, out of a possible -- maximum
17 possible 20 percent, meaning an
18 approximately 65 percent opt-in rate. In
19 the East Village, which has R7A and R8A
20 inclusionary zones, we found the opt-in
21 rate is similar. This tells you that the
22 existing height limits do not prevent the
23 inclusion of affordable units, since in
24 nearly two-thirds of the cases developers
25 are opting to do so under these current

Proceedings

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2 conditions.

3 We decided to more closely
4 examine all new developments in our East
5 Village inclusionary contextual zones,
6 those that included the affordable housing
7 and those that did not. What we found is
8 that in, by far, the majority of the cases
9 where developers chose not to include the
10 20 percent affordable units the existing
11 height limits allowed them more than ample
12 room to do so with the same floor-to-floor
13 heights they were already using. In other
14 words, they could have included the
15 affordable housing without being forced to
16 squeeze the floor area into a packed
17 envelope. This confirms what we already
18 knew; height limits are not the reason
19 some developers chose not to include the
20 affordable housing units and raising the
21 height limits for this voluntary program
22 won't change that.

23 According to the 2013 City
24 Council study, every development which
25 chose to include affordable units was

Proceedings

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2 50 units or more. Why? Because
3 participation in those programs -- in this
4 program involves navigating significant
5 bureaucracies, greater uncertainty in
6 terms of time frames, and a certain savvy
7 in terms of negotiating a complicated
8 regulatory system. This is consistent
9 with our conversations with developers as
10 well. Smaller developers and smaller
11 developments seem disinclined to go
12 this route.

13 The 2013 study also noted that
14 developments outside the 421-a exclusion
15 zone rarely include the affordable units
16 because the incentive provided by this tax
17 abatement for doing so is gone. They get
18 the same tax abatement simply for building
19 market rate units.

20 ZQA and its height limit lifting
21 formula will do nothing to change these
22 factors, which are the true reasons why
23 some developers are not voluntarily
24 including the affordable units in
25 inclusionary zones. Lifting the height

Proceedings

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2 limits is nothing more than a red herring
3 which will not increase affordability but
4 which will contribute to out-of-scale
5 development that violates hard-fought-for
6 and reasonable parameters for new
7 development in residential neighborhoods.

8 We strongly urge you to vote no
9 on these proposed changes.

10 Thank you.

11 THE CHAIRPERSON: Thank you,
12 Mr. Moskowitz.

13 Questions for Mr. Moskowitz?

14 (No response.)

15 THE CHAIRPERSON: Thank you very
16 much.

17 We will now switch to --

18 (Applause.)

19 THE CHAIRPERSON: We will now
20 switch to those in favor, the next five
21 speakers, and this is numbers 81 through
22 85. Gregg Pasquarelli, David Levine, Bill
23 Stein, Jacob Dugopolski, and Gifford
24 Miller.

25 Greg Pasquarelli, is he here?

Proceedings

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(No response.)

THE CHAIRPERSON: No.

Is that -- is that someone coming?

David Levine.

MR. LEVINE: Hello, Commissioner Weisbrod and fellow members.

As a practicing architect at Dattner Architects, I work with developers of affordable housing, and I work with the zoning resolution on a daily basis and in favor -- and am in favor of the changes in the Zoning for Quality and Affordability proposal, which can increase the number of affordable units, improve the design of residential buildings, enliven the streetscape, while addressing the growing demand for affordable senior housing.

To comply with current limitations on maximum building height, architects in many cases are forced to squeeze ceiling heights to minimums under ZQA. Modest increases in allowable building height in medium and high density

Proceedings

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2 districts are proposed where voluntary
3 inclusionary incentives exist. These
4 increases will allow for necessary
5 floor-to-floor heights of nine-foot eight
6 inches, or ten foot floor-to-floor, which
7 is not unreasonable, to fit in building
8 systems such as ventilation and sprinklers
9 in block and plank construction, which is
10 the predominant construction type for new
11 mid-rise affordable housing. The modest
12 height increase will allow the first floor
13 to provide more viable retail and
14 commercial spaces and permit the first
15 residential level to be slightly elevated
16 to improve privacy of the dwelling units
17 and be in consistency with many existing
18 buildings.

19 ZQA changes will improve the
20 design of the streetwall through modifying
21 certain provisions of the 1987 Quality
22 Housing Program, such as streetwall
23 alignment. Under ZQA, permitted front
24 wall setbacks would increase opportunities
25 for landscaping and allow for greater

Proceedings

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facade articulation. For instance, modifications in court regulations will provide opportunities to break down the visual mass of large building -- large building through street-facing outer courts, and then, once outer courts are created, architects have the opportunity to locate non-required windows in courts for rooms such as kitchens and baths which will improve cross-ventilation and enhance occupant comfort.

Additionally, the need for additional affordable senior housing is growing, and modest increases in building height, typically one to two stories in medium and higher density districts, will create additional dwelling units.

As we know, many low income seniors don't own cars, and reducing off-street parking requirements for developments within that half mile transit free -- transit zone frees up site area for more dwelling units and allows limited development budgets to provide additional

Proceedings

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2 dwelling units instead of constructing
3 under-utilized parking

4 After attending the Manhattan
5 borough President's hearing and hearing
6 many of the concerns about the ZQA, I
7 believe it's important for the City
8 Planning Commission to understand the
9 proposed changes under ZQA will not allow
10 for additional floor area of market-rate
11 housing, and will not change floor area
12 ratios as they are currently prescribed in
13 the zoning resolution, will not alter or
14 eliminate contextual zoning districts, and
15 will not alter the Landmark Preservation
16 Commission's review process for projects
17 in historic districts or landmarked
18 buildings.

19 In closing, development teams
20 who build new affordable and affordable
21 senior housing struggle finding viable
22 building sites and managing with limited
23 funding while construction costs continue
24 to rise. As the mayor's Housing NYPlan
25 clearly states, the need to provide more

Proceedings

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2 affordable and affordable senior housing
3 is critical, and it's our collective
4 responsibility to address the shortage.
5 Enacting the modest provisions in zoning
6 resolutions based on ZQA is one solution
7 to help meet the demand of additional
8 affordable dwelling units.

9 Thank you.

10 THE CHAIRPERSON: Thank you very
11 much, Mr. Levine.

12 Any questions for Mr. Levine?

13 Yes, Mr. Cantor.

14 COMMR. CANTOR: Mr. Levine,
15 question, please. If the City were to
16 make available additional FAR, the
17 applicant could then build higher as well,
18 could he not?

19 MR. LEVINE: If height increases
20 accompanied that. But my understanding of
21 the present ZQA is that there's no
22 proposed changes to the FAR.

23 COMMR. DE LA UZ: Right.

24 COMMR. CANTOR: But they will be
25 able to go higher --

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MR. LEVINE: In some cases --

COMMR. CANTOR: -- which gets
back --

MR. LEVINE: -- depending on the
district.

COMMR. CANTOR: Which gets back
to the -- to the position that a number of
speakers before this have said, one size
does not fit all. There are going to be
instances where the added height is of
little value. There are going to be
instances where the added height will be
of significant value in terms of their --
in terms of visibility. The taller the
building, the more the developer gets on
the upper floors. And assuming that --
assuming that he has a legitimate site,
he's going to take advantage of the
taller building option. If otherwise, he
won't take advantage of the taller
building option. Is that a fair
observation?

MR. LEVINE: Probably. But I
can only speak on behalf of our affordable

Proceedings

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2 housing developments where we're
3 frequently struggling with fitting in the
4 program, which is frequently a mixed-use
5 building with retail or commercial spaces
6 on the ground floor, and in many cases a
7 hundred percent affordable units above.
8 So when we design to the maximum building
9 heights, our conversations with our
10 clients result in dwelling units that we
11 can't fit in the building, and this
12 provision would allow for additional
13 affordable dwelling units which would
14 provide increasing -- you know, a
15 portion added of affordable housing.

16 COMMR. CANTOR: Thank you.

17 THE CHAIRPERSON: Any other
18 questions for Mr. Levine?

19 (No response.)

20 THE CHAIRPERSON: Thank you.

21 Thank you very much.

22 Bill Stein.

23 MR. LEVINE: Bill -- actually
24 Bill is a principal at Dattner Architects,
25 and he was tied up in a meeting, but he

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was going to submit written testimony.

THE CHAIRPERSON: Okay.

Jacob Dugopolski. Am I
pronouncing that correctly?

MR. DUGOPOLSKI: Yeah. Jacob
Dugopolski (Reading:) Commissioner
Weisbrod and the Commission, my name is
Jacob Dugopolski, and I am an associate
with WXY Architecture and Urban Design.
On behalf of myself and Claire Weisz,
FAIA, founding principal of WXY, I'm here
to testify in support of the Zoning for
Quality and Affordability text amendment
after reviewing the briefing, full text
and testing on a number of sites in
various boroughs, in particular, complex
and irregular lots, we believe this text
amendment will, first and foremost,
enhance the streetscape quality. This
will be improved by refining the line-up
provisions, including a coherent street
law, which can be circumvented currently,
along with variations and recesses above
which will contribute immensely to the

Proceedings

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2 light and shadow along the streetwall.

3 This flexibility for design is
4 what made our -- has made our historic New
5 York buildings so well loved, and needs to
6 be allowed and encouraged. This will
7 increase the ability of architects to
8 design for the character and street, in
9 line with contextual buildings. Many of
10 these existing buildings that we see are
11 not allowed under the current streetwall
12 guidelines, and would be embraced with
13 this amendment.

14 The ZQA text amendment will
15 allow for increased ground floor activity.
16 Many blank walls and ill-proportioned
17 ground floors in the buildings are the
18 result of fitting residential units above
19 and compromising retail opportunities on
20 the street. A minor amount of additional
21 height will specify a maximum number of
22 floors, will allow the necessary
23 flexibility of construction, and new
24 opportunities on the street level. The
25 minor height increases will allow for more

Proceedings

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2 flexibility in the dormer portions of the
3 building without compromising light and
4 air, additionally, allowing for necessary
5 design expression and enrich the
6 streetscape experience.

7 Parking is also a major
8 constraint that we come along quite
9 frequently, producing -- and this would --
10 reducing them would produce more quality
11 buildings and greater flexibility within
12 the transit accessible zone and will allow
13 for improved street life and greater
14 affordable units. Many people have
15 testified to this extent, so this parking
16 is not necessary in many cases and
17 hinders design.

18 As architects and urban
19 designers at WXY, we believe that ZQA will
20 be a positive change in the City's zoning
21 code, updating to contemporary needs, and
22 produce buildings with greater compliment
23 and quality in New York City.

24 Thank you.

25 THE CHAIRPERSON: Thank you very

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much.

Questions for Mr. Dugopolski?

(No response.)

THE CHAIRPERSON: Thank you very
much.

The next speaker is Gifford
Miller. Welcome, Mr. Miller.

MR. MILLER: Good evening,
Mr. Chairperson, members of the
Commission.

Let me start --

THE CHAIRPERSON: It's not quite
evening yet. It depends on when you
started.

MR. MILLER: You haven't been
outside yet. Believe me, it's evening out
there.

THE CHAIRPERSON: It's dark
outside.

MR. MILLER: Let me first of all
thank you all for your patience and time
that you're taking to listen to all of us.
It's -- I have had to sit through many
hearings in my day but not many that were

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this long. So thank you for that.

And let me also wish Charlotte a happy 11th birthday. I'm sure she'll be missing her mother for the moment but hopefully she'll get home before bedtime.

Let me also -- let me just state I approach this issue from the point of view of having three principles that I think are at hand here. The first principle is one that I hope we can all agree on, which is that housing, particularly affordable housing, in the City is a crisis. We do not have enough housing. We certainly do not have enough affordable housing. Literally millions of New Yorkers struggle with this challenge, and it is a serious, serious challenge which requires measures that can be difficult. If it were easy, it wouldn't be a problem.

So I think it's important to just keep that in mind, that, you know, it's easy to come up and come up with reasons why not to do something about a

Proceedings

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2 problem that is that serious, but it's a
3 serious problem and sometimes we have to
4 just move past the concerns and the issues
5 that are -- many of those are legitimate,
6 in search of a greater good. And in this
7 case the greater good is that we have to
8 continue to make progress on the issue of
9 affordable housing in the City, or we will
10 not be the city that we can be and that we
11 must be for our residents and for people
12 wanting to come here from across the
13 globe.

14 The second principle, and this
15 is one that I think I can speak to fairly
16 uniquely because I've sat on both sides of
17 this table, is that when the City does
18 rezonings, it creates enormous value for
19 people, for some people. And it is
20 appropriate for the City to seek to
21 capture some of that value for the public
22 purposes that the City is here for. And I
23 was a part of the first discussions when
24 we started talking about inclusionary
25 zoning and were told by then

Proceedings

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2 administration members that you could
3 never do it, that it was impossible, and
4 you couldn't figure it out, that it could
5 never work. And yet we did it. And we
6 made real progress. And now we get to the
7 point of mandatory Inclusionary Zoning,
8 and we can't do it, it's too complicated,
9 it won't fit, it won't work. But we can
10 do it and we must do it because when we as
11 a city rezone, we are providing tremendous
12 value to some people and it is appropriate
13 to want to recoup some of that for
14 appropriate goals that are connected to
15 that. And so I think the Mandatory
16 inclusionary Zoning proposal is important,
17 it's critical, it's appropriate, it is
18 going to happen, it's going to happen all
19 over the world. It's happening all over
20 the country, it's going to keep happening.
21 And New York should be at the forefront of
22 it.

23 Finally, on the subject of the
24 ZQA, I think it's appropriate as the
25 principle -- so the previous principle was

Proceedings

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2 that when the City gives value, it should
3 get some value back. And the final
4 principle that is appropriate is what --
5 on behalf of taxpayers when the City
6 invests, it should get value for its
7 dollar. And when it comes to affordable
8 housing, because of some of the zoning
9 restrictions, the City is not getting
10 value for its dollar. Parking is a
11 particularly egregious example. As an
12 affordable housing developer, I have spent
13 tens -- hundreds of thousands -- actually,
14 probably millions of dollars building
15 parking places that won't get used. Those
16 are dollars that could have gone for many
17 other purposes. But unused parking spaces
18 seems to me to be a terrifically horrific
19 point of use for our taxpayer dollars.

20 And that -- and I can also say
21 that I was literally at a meeting
22 yesterday in which we were considering in
23 a building that we were designing, we were
24 considering putting a clinic in it. And
25 the height of the ground floor and the

Proceedings

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2 second floor for the clinic is a real
3 issue for us because those clinics require
4 additional ventilation and additional
5 mechanical systems, they need more height.
6 But we're pushing up right against the
7 height limit for our building. And we
8 have to make decisions, and we probably
9 will be unable to make the sort of
10 decision that we want to make, which is to
11 provide a clinic space, which is a real
12 community facility, important issue for
13 our -- the area that we are building in,
14 and also to provide as many affordable
15 housing units as possible. And I would --

16 (Bell rung.)

17 MR. MILLER: Perhaps somebody
18 has a question about setbacks.

19 (Laughter.)

20 THE CHAIRPERSON: There's going
21 to be a couple of questions.

22 Mr. Douek.

23 COMMR. DOUEK: Do you have
24 anything to add about the setbacks?

25 (Laughter.)

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MR. MILLER: Let me just say, I think this is -- so I think the setbacks, when you're trying to, again, for efficiency for the tax dollars, we're trying -- as an affordable housing developer we want to be able to build as efficiently as possible and to do it frankly, for not very many dollars. And with the setbacks, the way that they are right now, it's very hard to end up, if you get past the setback, with efficient floor plates. And without efficient floor plates, what that means is that we end up designing units that are either too large in some area or too small in another area. And so -- and therefore what happens is that instead of being able to efficiently create let's say a hundred units of affordable housing, we will only end up being able to create 93 because some of our two-bedrooms are too large and some of our studios are too small, for example. Why does that matter?

Well, it doesn't mean -- it's

Proceedings

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2 not actually -- I don't say that as a
3 concern for me, but I think -- what I
4 believe will happen if we pass ZQA and we
5 are more efficient about this, what will
6 happen is that HPD won't be required to
7 provide as much subsidy for creating the
8 same number of units. Because what's
9 happening in the world right now is the
10 construction costs are hugely up. In
11 fact, we will be seeing subsidies having
12 to go way, way up if it weren't for the
13 fact that tax credits would be priced at
14 historic -- it's amazing, amazing, amazing
15 levels. So we are being bailed out
16 essentially by the tax credit market at
17 the moment. But I can tell you that in
18 the two years since we closed on the
19 building that we are about to deliver, and
20 we just closed on a new building, we're
21 financing a new building in June, our
22 pricing has gone up 25 to 30 percent for
23 hard costs. And so eventually at some
24 point HPD and the City is going to have to
25 increase the subsidies in order to cover

Proceedings

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2 the cost of construction. And what
3 happens when we don't have these kinds of
4 efficiencies is it just means that HPD has
5 to spend more money.

6 And so it gets back to my point,
7 my principle. Look, choices have to be
8 made. That's what government is about, on
9 behalf of taxpayers, on behalf of
10 citizens. But to my mind, the practical
11 proposals that are in the ZQA allow the
12 government to make the choice to fulfill
13 the principle of greater affordable
14 housing, to get more value back when
15 they're creating value in terms of
16 rezonings, and to get more value for the
17 taxpayer dollar in creating as many
18 affordable housing units as possible with
19 the limited resources that we have.

20 Thank you.

21 THE CHAIRPERSON: Thank you.

22 Any questions?

23 Vice Chairman knuckles.

24 THE VICE CHAIRMAN: Gifford,
25 thank you for your perspective. It's good

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to see you.

My recollection is that maybe a decade or so ago when I was on the Planning Commission, and I think you were still in the Council, and we were passing contextual zoning modifications or checks, which the Council adopted, and you've heard perhaps some of the concerns around the Zoning for Quality, that it would disrupt or impact negatively contextual zoning.

Do you have a view on that given your history with this?

MR. MILLER: I do. I mean, it's like I said before. I think you have to make some tough choices here. And listen, I'm not -- I wouldn't suggest to you and I haven't given the time -- sort of time and energy, nor do I have the expertise that I think all of you have and your staff and that you've had the opportunity to listen to many, many people. I'm sure that there are ways to improve that compromise from where we stand today. But in the end of

Proceedings

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2 the day, I don't think five feet is the
3 end of the world for anybody. It's just
4 never the end of the world, five feet, I
5 don't think, you know. And I think
6 there's contextual and there's contextual.
7 So what some people mean by contextual
8 other people would say is, you know, not
9 contextual. So ten feet, is that
10 contextual or, you know, I mean it depends
11 on what zoning you're in.

12 And my view is if you take a --
13 I've always say if you take a 300 foot
14 building and make it 320 feet no, no
15 one -- people will freak out at hearings
16 like this, but when you actually go to
17 build it, no one will know. And so I do
18 think that there's certainly -- I'm not
19 suggesting that the concerns about
20 contextual zoning aren't real.

21 We need contextual zoning, we
22 need to have the ability to craft zoning
23 that controls the kind of building that
24 can be done there because it protects
25 property values, because it protects

Proceedings

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2 social values. It's important. But I
3 also think that we can get overly attached
4 to numbers that aren't actually going to
5 seriously undermine the context and that
6 are important for other social goals. So
7 it is a matter of trade off.

8 THE CHAIRPERSON: Any other
9 questions for Mr. Miller?

10 MR. MILLER: Oh, actually
11 somebody might have a question about the
12 Center for an Urban Future, which I chair.

13 THE CHAIRPERSON: I'll ask, all
14 right, I'll bite.

15 (Laughter.)

16 MR. MILLER: So I just want to
17 note that Jonathan Bowles, who was signed
18 up to testify on behalf of the Center for
19 an Urban Future, which I am chairman of,
20 wanted to be here to testify. I will hand
21 in written testimony on his behalf. But
22 the Center for an Urban Future feels that
23 it's important that we expand affordable
24 housing and that we expand, particularly,
25 senior housing in order to make this city

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livable and --

THE CHAIRPERSON: Thank you.

And actually, because of that you've managed to generate a question from Ms. Efron.

COMMR. EFFRON: It's actually not about Center for an Urban Future, and Charlotte does thank you for the birthday shout out.

MR. MILLER: Thank you. I know she's glued to the TV.

COMMR. EFFRON: I just have a question about the BSA process, the hardship process, since you have been involved in so many aspects of this and now are a developer.

Any thoughts for us on how to make that really efficient and a positive aspect of ZQA?

MR. MILLER: The BSA hardship process?

COMMR. EFFRON: Yes.

MR. MILLER: Gosh, you've stumped me, Cheryl.

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COMMR. EFFRON: Sorry, you can
say --

MR. MILLER: I mean, actually I
would just say, you know, I think that
it's a -- I've never taken advantage of
the BSA hardship, I haven't had that
opportunity or necessity. But I think
that the goal is really to try to minimize
the use of the BSA by having greater
flexibility in the zoning so that we don't
reach the point of hardship. And it seems
to me that's sort of the purpose of what
the ZQA is trying to address is that you
don't end up with these problems. And it
also sort of eliminates the notion of that
hardship because if the hardship -- you
know, we could go, for example, we could
go to the BSA. But is it really a
hardship that we can't get in a community
facility? And what that then has to be a
say to overexpand what it means as
hardship in its own core.

So by building in greater
flexibility and -- we just shouldn't have

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to get to the BSA in the first place.

THE CHAIRPERSON: Thank you very much.

MR. MILLER: Thank you.

THE CHAIRPERSON: I just want to take personally this opportunity to thank you for your role in creating the High Line, which is really one of New York's great assets.

MR. MILLER: Thank you.

THE CHAIRPERSON: And you really were essential to its creation. So thank you.

MR. MILLER: That's very kind of you to compliment me on.

THE CHAIRPERSON: The next five speakers, now, in opposition, Sarah Bean Apmann, Matthew Morowitz, Ted Minean, I think, Justine Leguizamo, and Katherine Schoonover.

Starting with Sarah Bean Apmann.

Another visual aid.

MS. APMANN: These are in your packet.

Proceedings

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2 THE CHAIRPERSON: Okay, thank
3 you. Go ahead, Ms. Apmann.

4 MS. APMANN: Okay. Continuing
5 with GVS -- GVSHP testimony. Looking at
6 actual developments in our area built
7 under the existing height limits
8 consistently refutes the arguments for ZQA
9 and its lifting of height limits. For
10 example, we found that every one of the
11 new developments with affordable housing
12 in the inclusionary zones in the East
13 Village were not only able to be built
14 under the existing height limits, but
15 actually did not even fill out the entire
16 zoning envelope. 79-89 Avenue D, which is
17 under construction, 21 East First Street,
18 and 101 Avenue D, all left height on the
19 table thus illustrating that ZQA's
20 proposed height increases are absolutely
21 unnecessary. The two avenue D
22 developments are even both on interior
23 lots, which have more restrictive lot
24 coverage rules.

25 All have more than adequately

Proceedings

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2 scaled ground floors; while we were only
3 able to definitively determine the ground
4 floor height for 79 Avenue D, 13 feet, 21
5 East First Street has a large enough --
6 has a large space for a bank on the ground
7 floor, and 101 Avenue D's ground floor
8 perfectly matches the height of two early
9 20th century neighbors, exactly the types
10 of buildings and proportions DCP claims
11 new construction in contextual zones
12 cannot replicate due to current height
13 limits.

14 79 Avenue D's other
15 floor-to-floor heights also perfectly
16 match those of its neighbors, further
17 refuting DCP's claim that it's impossible
18 to build affordable developments in
19 inclusionary contextual zones without
20 substandard "packing the bulk"
21 configurations. In the case of all three
22 developments, the existing height limits
23 would have actually allowed even more
24 generous floor-to-floor heights, which DCP
25 claims developers would provide if only

Proceedings

1
2 they were not prevented from doing so by
3 existing height limits.

4 Had ZQA been enacted, none of
5 these developments would have provided a
6 single additional square foot of
7 affordable housing; the only difference
8 would have been that these developments
9 could have been 25 feet taller.

10 Looking at those developments in
11 inclusionary zones which did not include
12 affordable housing is equally instructive.
13 Both 138 East 12th Street and 152 Second
14 Avenue chose to include -- only include
15 market-rate units, but had more than ample
16 room to include affordable units. Thus,
17 their decision had nothing to do with the
18 height limits.

19 138 East 12th Street reaches
20 91 feet, but could have gone to 120, while
21 152 second Avenue rises to 60 feet when it
22 could have reached 80. 138 East 12th
23 Street chose a ground floor height of
24 13 feet eight inches, even greater than
25 the height DCP says developments in

Proceedings

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2 contextual zones are presently prevented
3 from reaching by current height limits.
4 It should be noted that this developer
5 could have actually made their ground
6 floor over 40 feet tall under the existing
7 height limits, while still keeping the
8 upper floors the same height they are now
9 and still maxing out the allowable floor
10 area, pointing to the ludicrous lack of
11 need for these height limit increases.

12 The developer of 152 Second
13 Avenue chose a slightly more modest
14 twelve-and-a-half foot ground floor, which
15 lines up perfectly with its older
16 neighbors. The 1920s building which
17 previously stood on this site also had a
18 twelve-and-a-half foot ground floor. The
19 building is only 60 feet tall, which not
20 only does not even meet the maximum
21 allowable height of 80 feet, it does not
22 even meet -- I'm sorry it does not even
23 meet the allowable maximum height of 65
24 feet. I'm sorry, it does not, yeah. The
25 building utilized the full allowable FAR

Proceedings

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2 for a market rate building, but could have
3 gone 20 feet higher undercutting --
4 undercutting the DCP's claim about
5 restrictions and impediments imposed by
6 the existing zoning height limits. It
7 should be noted that 152 Second Avenue is
8 also on an interior lot, which has greater
9 lot coverage restrictions.

10 Under ZQA, 138 East 12th Street
11 could have been 34 feet taller, and 152
12 Second Avenue could have been 25 feet
13 taller, without providing a single unit of
14 affordable housing and arguably without
15 any improvement in its aesthetics or
16 retail space.

17 Looking at these real life
18 examples, it's impossible to come to any
19 conclusion other than that the DCP's
20 analysis and conclusions are flawed, and
21 the entire rationale for ZQA is faulty.

22 THE CHAIRPERSON: That was very
23 well done.

24 (Laughter.)

25 MS. APMANN: I was worried about

Proceedings

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the time.

THE CHAIRPERSON: Well, you came in under the bell so you did pretty well.

Any questions for Ms. Apmann?

(No response.)

THE CHAIRPERSON: Thank you very much.

MS. APMANN: Thank you.

THE CHAIRPERSON: Matthew Morowitz.

MR. STEWART: Chair Weisbrod commissioners, my name is Trevor Stewart. I'm a trustee of GVSHP. And I'm continuing the testimony of GVSHP and reading the testimony that Matthew Morowitz would have presented had he hadn't had to leave.

We have found much life -- real-life, empirical evidence illustrating that existing height limits do not prevent affordable units from being built in inclusionary contextual zones, nor do they force inadequately scaled ground floors or floor-to-floor -- or floor-to-floor

Proceedings

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2 heights by contrast, DCP has based their
3 case largely on the Citizen's Housing
4 Planning Council report, "The Building
5 Envelope Conundrum," and on their own
6 analysis in their environmental review.
7 But both are deeply flawed and do not
8 reflect the types of buildings or
9 conditions that ZQA would affect.

10 The CHPC report purports to show
11 how difficult it is to access full FAR in
12 new developments in contextual zones.
13 What it actually shows is 17 specifically
14 chosen developments, less than half of
15 which are unable to use full FAR as a
16 result of the building envelope. However,
17 it should be noted that in all but two
18 cases, the difference between the building
19 development and the maximum allowable
20 floor area is minute, typically a one or
21 two percent difference. In one case, the
22 development is actually a mere two square
23 feet less than the maximum allowable.

24 It should also be noted that
25 according to the report, many of the

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developments cited are located on irregularly shaped lots or split between multiple zoning districts, conditions which always make fitting standard zoning criteria difficult. Some are not even in contextual zones, thus making them irrelevant to the argument for ZQA and for raising height limits in contextual zones altogether.

Further, it should be noted that the developments covered by the report are almost exclusively a hundred percent affordable housing developments, not the 80/20 or 100 percent market rate developments covered by ZQA. One hundred percent affordable housing developments often have different needs and configurations than 80/20 or 100 percent market-rate developments. Thus, to use such developments to argue that changes are needed for the types of developments covered by ZQA is false. And while there may well be accommodations which are reasonable and appropriate to make for a

Proceedings

1
2 hundred percent affordable developments,
3 such accommodations are not necessarily
4 reasonable or appropriate or even
5 necessary for 80/20 or one hundred percent
6 market-rate developments, which is what
7 ZQA covers.

8 Similarly, DCP's analysis in its
9 environmental review of the ability to
10 achieve full FAR in contextual and
11 inclusionary zoning districts says it is
12 impossible to do in many cases without
13 "packing the bulk" configurations.

14 However, this analysis is based entirely
15 upon narrow street, interior lot sites,
16 which are the most restrictive types of
17 zoning lots. To use this basis for a
18 supposedly comprehensive analysis of
19 current conditions and to further use it
20 as a basis for making recommendations for
21 across-the-board changes on all types of
22 zoning lots is disingenuous, at best,
23 willfully misleading at worst.

24 But this is not just putting a
25 thumb on the scales of a supposedly

Proceedings

1
2 objective analysis. The narrow street
3 interior lots which DCP uses as the basis
4 for its environmental review actually
5 almost never have inclusionary zoning,
6 making its analysis and recommendations
7 all the more preposterous. Inclusionary
8 districts are mapped almost exclusively on
9 major avenues, and thus, DCP's supposed
10 analysis almost never actually applies to
11 them.

12 For example, in Community
13 Board 3 less than one percent of the lots
14 covered by inclusionary contextual zoning
15 districts are narrow street interior lots.
16 And yet, based upon an analysis of these
17 types of lots, DCP is recommending lifting
18 the height limits for the other 99 percent
19 of the lots covered by inclusionary
20 contextual zoning.

21 Given this deeply flawed
22 analysis, we urge you to reject these
23 proposed changes and to preserve the
24 existing height limits

25 Thank you very much.

Proceedings

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THE CHAIRPERSON: Thank you very

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much.

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Questions?

5

(No response.)

6

THE CHAIRPERSON: Thank you.

7

The next speaker is Ted, is it

8

Minian?

9

MS. LEGUIZAMO: Mineau.

10

THE CHAIRPERSON: I'm sorry.

11

Mineau?

12

MS. LEGUIZAMO: Yeah. I'm not

13

Ted.

14

Hi everyone. I am Justine

15

leguizamo. I'm speaking for Ted. I am a

16

Trustee of the Greenwich Village Society

17

for historic Preservation.

18

So it's clear that ZQA will do

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little or nothing to increase the

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affordability of our city or the

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production of affordable housing.

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Arguably, creating a mandatory

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inclusionary housing policy would require

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new residential developments to include a

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substantial portion of affordable housing.

Proceedings

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2 But this MIH proposal won't do that,
3 because it will only be applied if an area
4 is being significantly upzoned to allow a
5 large increase in the allowable amount of
6 market-rate housing. Therefore, MIH won't
7 be applied to any of the existing
8 inclusionary zoning districts. And to get
9 the affordable housing, you have to accept
10 a lot more market-rate housing than is
11 currently allowed.

12 This unnecessarily puts the
13 creation of affordable housing
14 fundamentally at odds with maintaining a
15 reasonable scale of development. But,
16 perhaps more perniciously, it means that
17 to get affordable housing, a virtual flood
18 of market-rate housing will have to come
19 along with it, in great excess of the
20 amount currently allowed. This inevitably
21 means that when MIH is applied, it will
22 not only result in the destruction of the
23 scale and character of the affected
24 neighborhoods, but make such neighborhoods
25 on the whole less affordable as well.

Proceedings

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2 This is essentially applying the
3 williamsburg/Greenpoint and West
4 Chelsea/Hudson yards model to the entire
5 City. Those neighborhoods were rezoned in
6 2005 to allow significantly increased
7 market-rate development, and in exchange
8 for some affordable housing creation. In
9 the past ten years,
10 Williamsburg/Greenpoint and West
11 chelsea/Hudson Yards have produced far and
12 away the greatest number of new affordable
13 housing units in the City through the
14 inclusionary zoning program. But the
15 tsunami of market-rate housing, which was
16 the price to pay for it, has made these
17 two neighborhoods unrecognizable either
18 physically or socioeconomically. They
19 look more like Hong Kong or Miami than New
20 York City. And they are among the least
21 affordable most rapidly gentrifying parts
22 of the City.

23 Thank you.

24 THE CHAIRPERSON: Thank you.

25 Any questions?

1 Proceedings

2 (No response.)

3 THE CHAIRPERSON: The next
4 speaker is Justine Leguizamo.

5 MS. LEGUIZAMO: That was me.

6 THE CHAIRPERSON: Oh, that was
7 Justine. Never mind.

8 The next speaker is Katherine
9 Schoonover.

10 MS. LEGUIZAMO: She left.

11 THE CHAIRPERSON: She left,
12 okay.

13 Okay, going back to those in..
14 Favor. The next five speakers are, and
15 these are numbers 91 through 95, Alexandra
16 Hanson, Martin Dunn, Pornipisal
17 Pendanathy; I don't know, we'll see when
18 they come up. Michael Kwartler and
19 Christine Hunter.

20 Alexandra Hanson.

21 MS. HANSON: Good afternoon. My
22 name is Alexandra Hanson, Policy Director
23 for the New York State Association for
24 Affordable Housing or NYSFAFH. NYSFAFH is
25 the statewide trade association for New

Proceedings

1
2 York's affordable housing industry. Our
3 375 members are responsible for most of
4 the housing built in New York State with
5 federal, state or local subsidies.

6 Thank you for the opportunity to
7 testify today on the Zoning for Quality
8 and Affordability and Mandatory
9 Inclusionary housing proposals.

10 I am here today to express
11 NYSFAH'S strong support for both
12 proposals, which will help NYSFAH members
13 provide much needed affordable housing in
14 communities throughout New York City.

15 The zoning rules that dictate
16 building envelopes have not kept pace with
17 prior building requirements, modern
18 construction practices, or the City's
19 priority to build affordable housing. As
20 a result, NYSFAH members must often leave
21 floor area ratio unused, resulting in a
22 loss of affordable units at a time when
23 the City is experiencing a housing crisis.
24 Modernizing building envelope requirements
25 under ZQA will ensure that affordable

Proceedings

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2 housing developers can maximize the number
3 of affordable units, as well as provide
4 better designed units, buildings that
5 better fit with neighborhood character,
6 and more quality retail and community
7 facility spaces.

8 ZQA would also allow options for
9 more appropriate design on irregularly
10 shaped lots, sloped sites -- and sloped
11 sites, which currently pose significant
12 challenges for affordable development.

13 Another major challenge for
14 affordable housing is the requirement to
15 provide parking, which can cost upwards of
16 \$60,000 per space. Parking requirements
17 draw subsidy and space away from the
18 production of affordable units, and
19 detracts from uses such as ground floor
20 retail, children's play areas and green
21 spaces. And a large number of spaces
22 regularly go unused in affordable
23 developments throughout the City, while we
24 see huge wait lists for affordable units,
25 as you heard from previous speakers. The

Proceedings

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2 elimination of parking requirements for
3 affordable units in transit zones would
4 enable NYSFAH's members to focus scarce
5 land and financial resources on building
6 more affordable housing.

7 One of the populations that has
8 been hit particularly hard by the housing
9 crisis is New York City's seniors, many of
10 whom must contend with fixed incomes and
11 housing market pressures in the face of
12 declining federal funding for new senior
13 housing. ZQA would help NYSFAH staff
14 members serve the housing needs of New
15 York City's seniors by providing the
16 opportunity to take advantage of an FAR
17 bonus and eliminating parking requirements
18 for senior developments, helping the
19 City's seniors stay in their communities.

20 In addition to ZQA, NYSFAH
21 supports MIH as a tool to leverage market
22 rate development for the production of
23 affordable housing. In strong markets
24 this enables affordable housing to be
25 built without subsidies, allowing limited

Proceedings

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2 resources to be directed to neighborhoods
3 where affordable housing would not be
4 feasible without these subsidies. MIH
5 will ensure that affordable housing
6 requirements are included in all future
7 rezonings in neighborhoods and sites
8 throughout New York City. MIH will create
9 housing that serves a range of incomes,
10 providing much needed affordable housing
11 to New York City's residents and helping
12 the City sustain economically diverse
13 communities.

14 In closing, NYSAFAH supports ZQA
15 and MIH, which will facilitate the
16 creation of much needed affordable housing
17 for New York City's residents.

18 Thank you for your consideration
19 of NYSAFAH's comments.

20 THE CHAIRPERSON: Thank you,
21 Ms. Hanson.

22 Questions for Ms. Hanson?

23 (No response.)

24 THE CHAIRPERSON: Thank you very
25 much.

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The next speaker is Martin Dunn.
Welcome, Mr. Dunn.

MR. DUNN: Thank you. I'm
Martin Dunn, from Dunn Development Corp.
I'm a Brooklyn-based developer of
affordable and supportive housing, and I
spent the last 23 years building high
quality homes for low- and moderate-income
New Yorkers, including the homeless and
people with special needs.

So I first want to speak in
favor of Mandatory Inclusionary Housing.
I've been a long-time advocate for
mandatory inclusionary, first testifying
in 2003 at a City Council hearing when it
was being considered for
greenpoint/Williamsburg.

Mandatory Inclusionary Housing
is a critical -- is a critical tool so
that in stronger markets the market-rate
units can generate affordable housing
without capital subsidies. This enables
the limited capital subsidies the City has
to be used in neighborhoods like East New

Proceedings

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2 York and Brownsville, where you can't have
3 development without those subsidies, and
4 also enables the subsidies to be used to
5 provide deeper affordability. At the same
6 time, mandatory inclusionary will create a
7 hedge against future gentrification in
8 lower income neighborhoods like East New
9 York. Williamsburg would be a different
10 neighborhood today if mandatory
11 inclusionary housing had happened in 2005,
12 as would 4th Avenue in Park Slope and
13 other neighborhoods around the City. This
14 has been a long time coming, and the City
15 needs this critical tool.

16 I next want to speak in favor of
17 the Zoning for Quality and Affordability,
18 and by the way, I only do affordable
19 housing, so that's my only -- whole
20 business, no market-rate housing.

21 You've already heard all the
22 arguments about parking requirements, so
23 here are a few actual examples from our
24 projects our Liberty Apartments project in
25 East New York, that we developed in

Proceedings

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2 partnership with Cypress Hills Local
3 Development Corporation has 18 parking
4 spaces to meet the requirements. Only six
5 of them are being used by residents.
6 That's one-third.

7 At our King Garden Seniors
8 project in Brownsville, three percent of
9 the residents own cars, which means of the
10 15 parking spaces required by zoning, two
11 are used by residents. The revenue, ten
12 dollars per month, \$240 per year for the
13 parking lot.

14 At our Highbridge Overlook
15 project in the Highbridge section of the
16 Bronx, we built on a steeply sloped site
17 with rock outcroppings. I can explain the
18 details, but because of the site
19 conditions, parking, which would normally
20 cost \$50,000 a space, instead, cost more
21 than \$80,000 per space. The revenue
22 generated from the parking, zero dollars.
23 We can't charge for the parking or we
24 wouldn't be able to take the low income
25 housing tax credits on the cost to build

Proceedings

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the parking.

We have tens of thousands of people on waiting lists. We have one waiting list that currently has 70,000 -- more than 70,000 people on it. We have no one on our parking waiting list.

In terms of building envelope restrictions, too often we are forced to choose between having quality first floor retail and community facility spaces on the ground floors or losing a whole floor of the building. The comments you heard are disingenuous, and I'm happy to answer questions about that. Or, alternatively, we instead put apartments on the ground floor and then residents have the option of choosing between any privacy or any natural light.

We've seen the positive impacts when we've been allowed to change the zoning to allow for taller first floor heights when we have done rezonings, most recently on our Livonia Commons Project in East New York, where we have 15- to

Proceedings

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2 16-foot first floor-to-floor heights
3 across the four buildings. This creates
4 high quality spaces. We've signed up
5 pharmacy, a supermarket, a community arts
6 center, and a Catholic Charities program
7 space huge wins for the neighborhood,
8 strong interest in those spaces. And on
9 voluntary inclusionary sites, which we
10 have done a number of them unusually
11 shaped sites, sloped sites, and
12 particularly with senior housing, senior
13 housing bonuses, we cannot always fit the
14 allowable floor area within the zoning
15 envelope restrictions. Those higher floor
16 area ratios for senior housing is a very
17 important tool, but it doesn't help us if
18 we can't use it. And the senior housing
19 we've done has not used all the FAR that
20 was allowed. And so, ZQA enables more
21 affordable senior housing that's
22 permanently senior housing, most often
23 developed by non-profits.

24 So I appreciate the opportunity
25 to testify, and I'll be happy to answer

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any questions.

THE CHAIRPERSON: Questions for
Mr. Dunn.

Mr. Cantor and then Ms. De La Uz.

COMMR. CANTOR: Mr. Dunn, thank
you. You mentioned one site where your
parking was running like \$80,000 a unit?

MR. DUNN: Yes.

COMMR. CANTOR: How did you make
the job work, how did it pencil out?

MR. DUNN: Government paid for
it.

COMMR. CANTOR: The government
paid for it?

MR. DUNN: The government paid
for it. The reason -- you know, the
housing itself wasn't expensive. It's a
very steep, sloped site. But at the
bottom of the slope, we put our
residential lobby and elevators and some
space, and then we stepped the building up
the hill. So we sat on rock. Part of the
building starts on the cellar level, part
starts at the third floor. So the fourth

Proceedings

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2 floor is different from where the building
3 starts. That's fine.

4 We bored right on rock. It was
5 actually cheaper than our other housing,
6 except for the parking, because we had to
7 cut into the cliff and then we had to
8 build a steep driveway up and build a
9 retaining wall for the driveway.

10 COMMR. CANTOR: But the job --

11 MR. DUNN: So it was
12 \$1.4 million -- 1.4 --

13 COMMR. CANTOR: -- the job
14 excuse me -- the job penciled out because
15 of additional subsidy?

16 MR. DUNN: Yes. And you also --
17 within the affordable sphere you raise
18 rents so, you know, if we're doing tax
19 credit housing below 60 percent of area
20 median income, as you've heard from
21 people, people want units below 50, below
22 40, below 30. So the same subsidy that
23 could lower that rent from 60 down to 50,
24 40 or 30 could also be used to build
25 parking.

Proceedings

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2 In our Livonia Commons project
3 50 percent of the units, there's
4 100 percent affordable, but 50 percent of
5 the affordable units were below 50 and 40,
6 using City subsidies. There's no parking
7 on that in those four buildings because of
8 the rezoning we did. If we had parking,
9 that same money that would have built
10 underground parking, because we weren't
11 going to build it at the ground level and
12 give up the supermarket, the pharmacy, the
13 art center and the other things the
14 neighborhood desperately needs. If we
15 built underground parking, that money
16 would have meant, instead of a rent at
17 40 percent we'd have more units at 60
18 percent.

19 One in eight households, one in
20 eight renter households in East New York
21 applied for the lottery for Livonia
22 Commons. One in eight, evenly spread
23 among the 40, 50 and 60 percent of area
24 median income. If we had to build
25 parking, that would not have been the

Proceedings

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2 case. We could not have served people at
3 those income ranges. It's the same pot of
4 money, as some other speakers talked
5 about. If we spend the money to build
6 parking, we're not spending the money on
7 deeper affordability.

8 We built a parking garage on an
9 affordable project in east Williamsburg,
10 spent \$5 million to build 94 spaces
11 because of political demands for parking.
12 None of it was supported by debt. The
13 parking barely breaks even. \$5 million in
14 City subsidy to build a parking garage
15 instead of building affordable housing.

16 I'll tell you, we get the -- you
17 go out to East New York, the demand for
18 affordable housing is so high, we don't
19 hear people mentioning cars at all. Our
20 parking lots in East New York are
21 two-thirds empty. And people say, Why did
22 you build so much parking? We could have
23 had a basketball court, we could have had
24 this, we could have had that.

25 COMMR. CANTOR: Thank you.

Proceedings

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THE CHAIRPERSON: Ms. De La Uz.

COMMR. DE LA UZ: Thank you, Martin. As always, you have the real life examples to help illuminate why these things are so critical.

I'm just wondering, I mean obviously we just heard a lot of testimony, and we have, and I think you might have heard it, too, from the Greenwich Village Society for Historic Preservation. You know, it seems like your experience of why ZQA is needed and their concerns that they have are -- seem to be lightyears away.

Could you help unpack about why that might be?

MR. DUNN: Sure. I think a lot of it has to do with they kept talking about not reaching the maximum building height. That's -- it's the streetwall height that always restricts us. We may be four feet under the maximum building height, but we can't raise our first floor up, right? And so it's the streetwall

Proceedings

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2 height that's the killer for us. And the
3 idea is, look, if we could end up with a
4 store at 12 feet, 11 or 12 feet, we're
5 thrilled. But to get to a store with a
6 ceiling height of 11 feet, you need to
7 start at 16.

8 At our Livonia Commons project
9 we wanted lots of glazing right along the
10 street, so we went 15 to 16-foot
11 storefront bays. The steel beams, they
12 are 30 inches, okay. So we have an
13 eight-foot floor plank, then we have a
14 30-inch beam, then we have sprinkler
15 pipes, then we have ductwork. And it all
16 stacks. So we start at 16 feet and we end
17 up -- we end up with 11 feet.

18 And when we have sloped sites.
19 By the way, we have sites that slope four
20 or five feet across the building site, and
21 we can't enter at the low part because
22 then the space is going to be half
23 underground. We enter at the higher part
24 but your street -- your height's
25 calculated from the median point on the

Proceedings

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2 site. So there's lots of -- it's just --
3 look, I'll be honest, we have the -- we
4 make the -- we struggle in these decisions
5 to have crappy ground floor apartments
6 and -- look, we won't build crappy ground
7 floor retail space, so we put the
8 apartments on the ground floor. We did a
9 project in East New York on a commercial
10 zone, the full block frontage, 200 feet,
11 we put only residential and parking
12 because we would have had such low
13 heights. When you have low -- if you have
14 low ceiling heights in retail spaces, you
15 get lousy tenants, and there's -- or they
16 sit vacant. It does nothing for the
17 neighborhood.

18 Look, I thought when you guys
19 came out with ZQA it was the biggest
20 no-brainer in the world because you're
21 fixing all these little things that have
22 made us do lesser quality projects. So
23 I've been shocked by the opposition. But
24 after hearing the testimony today, I found
25 so much of it disingenuous and inaccurate.

Proceedings

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2 We have many examples of where
3 we could not utilize all of the floor area
4 on sites.

5 THE CHAIRPERSON: Mr. Dunn, let
6 me, if parking was made for affordable
7 housing, senior affordable housing, was
8 made optional, as is proposed under ZQA,
9 would there be instances where you as an
10 affordable housing developer would provide
11 some, or would you never provide it?

12 MR. DUNN: We -- look, if you're
13 close to subways, we probably wouldn't
14 provide it. And look, we have -- we have
15 two residents that have cars, and they're
16 going to age in place. And so we expect
17 that, you know, we start with three
18 percent over time, that it's going to go
19 down. It doesn't have far to go down.
20 But we may have a point where we don't
21 have a single senior with a car. The
22 site's a block from the subway.

23 By the way, our other one that's
24 a third empty, when we opened in 2011,
25 there was more people parking. Car

Proceedings

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2 ownership has gone down since we opened it
3 in 2011 to now.

4 And then we also find, and you
5 probably heard people say this, even if
6 we're charging \$25 or \$30 for parking,
7 people don't use it because they'll save
8 that money and park on the street. If you
9 are low income, you're scraping to get by.
10 If you have to own a car, if you have to
11 because of work or otherwise, you're
12 really struggling because of how expensive
13 it is.

14 But on senior housing we
15 probably wouldn't. We have a very active
16 gardening program in our Brownsville
17 senior housing project, and if you pass
18 this, we're going to rip up asphalt and we
19 are going to expand the garden.

20 (Laughter.)

21 THE CHAIRPERSON: Thank you,
22 Mr. Dunn.

23 Any other questions for
24 Mr. Dunn?

25 (No response.)

1 Proceedings

2 THE CHAIRPERSON: Thank you very
3 much.

4 MR. DUNN: You're welcome.

5 THE CHAIRPERSON: The next
6 speaker is, if I'm pronouncing this right,
7 is Pornpiwan.

8 MS. PENGSAWTHONG: Pawn, yeah.

9 THE CHAIRPERSON: You'll have to
10 come and --

11 MS. PENGSAWTHONG: It's Pawn.

12 THE CHAIRPERSON: You'll have to
13 come and say it yourself.

14 MS. PENGSAWTHONG: Good
15 evening. My name is Pawn Pensawthong. I
16 live in Selfhelp Scheuer House of Flushing
17 with my 99 years old mother for the past
18 seven years. I'm here today to -- I'm
19 here today is about living in affordable
20 senior housing, senior apartment.

21 Before I move in the Scheuer
22 House of Flushing, I live -- my mother and
23 I live in Elmhurst in a private apartment
24 complex. The reason I wanted to move is
25 because the rent keep increasing. And the

Proceedings

1
2 place where I live, I did not feel safe,
3 especially for my aging mother.

4 One day when we were watching
5 television and then I heard the noise pop
6 behind us, I don't know what the sound is,
7 and then we continue watching television.
8 And later the policeman come and ask about
9 the commotion, too, with the noise.
10 That's why we know it's a gunshot. This
11 is when I decided it was time to move.

12 I fill out many application for
13 public and private housing, but never
14 happen, but only to reply they reject me
15 because of my income.

16 One day my friend -- a friend of
17 mine told me about Selfhelp housing,
18 because her parents lived there and said
19 it was very nice. I applied and wait for
20 about three month before I was accepted.

21 Since living in Scheuer House of
22 flushing, I found it very beneficial for
23 my mother and myself. There are
24 emergency -- there is a security guard at
25 night. There are emergency pull cords in

Proceedings

1
2 the apartment in case of we fall. And
3 there's a railing in the hallway. When
4 the weather is bad, I walk in the hallway
5 to keep my knees from going stiff.

6 I feel more comfortable to live
7 in the senior housing and for my mother to
8 live -- to live with the -- I leave her
9 with the caretaker, and then I'll be able
10 to participate in activity in the
11 building. Whenever she need me, the
12 caretaker will give me a call and then I
13 will be there in less than five minutes

14 I'm very active in the tenant
15 council. And I feel living in the safe
16 housing, with all the different services,
17 will help our senior -- senior stay
18 healthy, both mentally and physically. I
19 feel it is very important for this city,
20 the New York City, to have more affordable
21 housing for all seniors. I think we
22 deserve to have a better life -- better
23 living environment in our life.

24 Thank you.

25 THE CHAIRPERSON: Thank you.

Proceedings

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(Applause.)

THE CHAIRPERSON: Thank you very much.

The next speaker is Michael Kwartler. Is Michael here? Where's Michael? Okay.

MR. KWARTLER: Mr. Chairman and members of the Commission, my name is Michael Kwartler. I'm the principal of Michael Kwartler & Associates, a planning architecture and design firm, and I'm president of the Urban Design -- of the Urban Design Council of the Environmental Simulation Center. I'm here to speak in favor of Zoning for Quality and Affordability.

A long time ago in a parallel universe I authored "Housing Quality Zoning", I think it was in the late 70s, which was adopted by the City as the City's first contextual zoning. It since had -- it was performance based, and particularly the height and setback regulations, which seem to be at

Proceedings

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2 everybody's ire, were based on an
3 analysis, an urban design analysis of the
4 existing context. And they were flexible
5 and they reflected and they complemented
6 the context. Ultimately it evolved to
7 quality housing, which is a form of
8 preregulation, very tired envelope, and to
9 some degree shrink-wrapped, one size fits
10 all.

11 I think the Zoning for Quality
12 and Affordability regulations are much
13 needed changes and much -- and really long
14 overdue. We're a mature city, as many of
15 the other speakers have said. We are
16 virtually built out. Sites are irregular.
17 There are any number of sites in the Bronx
18 and other places where rock is a real
19 issue and very steep slopes. And the
20 quality housing regulations as currently
21 configured don't fit. I spend a lot of
22 time with the Board of Standards and
23 Appeals, apropos an earlier question.

24 I think there's a real need, and
25 I think Zoning for Quality and

Proceedings

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2 Affordability supports the need to create
3 real affordable housing for the City. And
4 also the ability to be more responsive to
5 context, the existing context. Many of
6 the places I work are actually set back
7 from the street. Quality housing requires
8 you build a continuous streetwall and a
9 bunch of other things like that.

10 Zoning for quality housing also
11 responds to issues that, in a slide show
12 that I did years ago for the AIA, which is
13 called "Housing We Like But Cannot Be
14 Built Under current Zoning." Examples
15 include some of the best housing that are
16 veteran Jackson Heights on the East Side,
17 Knickerbocker Houses in Manhattan; it's a
18 huge list. And a lot of it really is
19 addressed in Zoning for Quality and
20 affordability. Changes in the court
21 regulations, streetwall locations,
22 building heights, setbacks and distance
23 between buildings will make it very much
24 more reasonable to be able to build some
25 of the best housing in the city that the

Proceedings

1
2 current regulations actually prevent you
3 from doing.

4 In terms of assisted living,
5 I've been doing a number of projects,
6 consulting on them, and also long-term
7 care. It's about time that this is all
8 clarified and really brought up-to-date.
9 The regulations, some of them actually,
10 the government programs don't exist
11 anymore. And clients come and go, what
12 applies, which is always an issue.

13 TOD, this is another one where
14 it's finally happened. New York City has
15 the best transit system in the country.
16 We have ridiculous parking requirements in
17 the boroughs when you're adjacent to mass
18 transit. And I think the exemptions for
19 affordable housing and affordable senior
20 housing really makes enormous sense.
21 Mr. Dunn, I think, really said it all in
22 do you want to put your dollars in parking
23 or do you want to put it in the units.

24 And the other part of it is that
25 most of the parking, if you can do it in

Proceedings

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2 affordable developments, is on grade. So
3 it's paved. So you lose some of the
4 permeability of the soil, it's not really
5 very sustainable, and you have no
6 backyard, there is no place to go, and I
7 think that's critical for seniors and
8 affordability.

9 Finally, I'd like to deal with
10 the height and setback regulations. I
11 agree the CHPC study was idiosyncratic. I
12 belong to CHPC, and there are real issues
13 with it. But I think what it points out,
14 in a kind of idiosyncratic way, is that
15 it's true, in many cases, depending on the
16 site conditions, the site configuration,
17 it's very difficult, if not impossible, to
18 actually use all of the floor
19 area.

20 (Bell rung.)

21 MR. KWARTLER: And most of the
22 work --

23 THE CHAIRPERSON: Finish your
24 thought.

25 MR. KWARTLER: -- I work on is

Proceedings

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2 affordable housing or combinations of
3 affordable and market rate housing. And
4 that would make a real difference.

5 I think the greater flexibility
6 that ZQA affords us will be responsive to
7 site context in the development program.

8 THE CHAIRPERSON: Thank you,
9 Mr. Kwartler.

10 Questions for Mr. Kwartler?

11 (No response.)

12 MR. KWARTLER: Thanks.

13 THE CHAIRPERSON: Thank you very
14 much.

15 The next speaker is Christine
16 Hunter.

17 MS. HUNTER: Good afternoon.

18 I'm Christine Hunter, a principal at
19 Magnusson Architecture and Planning in New
20 York City and also current Co-Chair of the
21 Design for Aging Committee at the AIA New
22 York Chapter.

23 While in general I support the
24 intentions of both the ZQA and the MIH
25 amendments, I want to speak today, on

Proceedings

1
2 behalf of the Design for Aging Committee,
3 specifically about the text amendments
4 that affect the design of affordable
5 senior housing.

6 As you know, the number of New
7 Yorkers over age 65 is projected to
8 increase substantially over the next
9 20 years, and seniors are especially
10 vulnerable to the effects of rising
11 housing costs throughout the City because
12 of low fixed incomes and increasing
13 frailty as they age. And there's a
14 dire need -- I don't need to actually read
15 this part of the testimony.

16 Our committee supports zoning
17 changes that will encourage the design and
18 construction of high quality developments
19 either for seniors alone or within
20 inter-generational buildings. Over the
21 last five years, we've engaged with
22 residents, housing providers and City
23 agency staff around the current challenges
24 to meeting this enormous demand for homes.
25 We particularly support the following

Proceedings

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2 elements of the ZQA text amendments.

3 First, the elimination of
4 required parking for new affordable senior
5 housing units within transit zones.

6 The provision to allow
7 construction of new housing or other uses
8 on existing underutilized parking lots
9 that are part of existing affordable
10 developments for seniors.

11 The provision to allow waiver of
12 parking for development -- for small
13 developments or small lots, similar to the
14 waiver provisions for affordable
15 housing -- family housing. That is a
16 small omission in the zoning ordinance
17 currently. But I have a project where,
18 you know, because we had to show that we
19 were as-of-right, we didn't take advantage
20 of the senior housing bonus, simply
21 because it was a corner lot, we couldn't
22 do parking. And so, you know, we chose
23 to, you know, to do the zoning analysis in
24 the design as family -- as regular
25 housing.

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Another one which I haven't heard mentioned here but which is actually quite critical, is the elimination of the dwelling unit factor or unit density control for affordable senior developments. Right now under the new HPD SARA program, which is, you know, sort of the City's version of the HUD 202 program, or replacing it, many developments, in fact I think most, with a combination of studios and one-bedrooms, will not be able to -- to include the number of units that the FAR would permit because of this density factor of, you know, depending on zoning. So, you know, even if you compromise on a lot of other things, ultimately, I hope that that will go through.

And finally, the provisions to revise the allowable FAR for affordable senior housing in certain districts where it's currently a little illogical, I think, the particular FAR provisions.

These text amendments will

Proceedings

1
2 contribute to the fullest and best use of
3 the available sites within existing
4 neighborhoods so that as many seniors as
5 possible can age in place and remain
6 engaged and active in their communities.
7 We feel that inter-generational
8 neighborhoods as well as mixed-income
9 neighborhoods benefit residences -- sorry
10 residents of all ages, and ultimately the
11 entire City.

12 Thank you.

13 THE CHAIRPERSON: Thank you very
14 much.

15 Questions for Ms. Hunter?

16 (No response.)

17 MS. HUNTER: Okay, thank you.

18 THE CHAIRPERSON: Thank you.

19 Now I'll go to people in
20 Opposition. The next five speakers are
21 Henry Euler, Jean-Daniel Noland, Betty
22 MacKintosh, Laura Spalter and Jennifer
23 Klein.

24 Henry Euler.

25 THE VICE CHAIRMAN: Jean-Daniel

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THE CHAIRPERSON: Jean-Daniel.

MR. EULER: Hello. My name is
henry Euler. I'm the First Vice President
of the Auburndale Improvement Association.
My civic covers the Auburndale section of
Flushing and western Bayside. My civic
association covers two Queens Community
Boards, 7 and 11, and we've also recently
celebrated our hundredth anniversary of
incorporation. I am also a member of the
Queens Preservation Council.

Although the goal to increase
affordable and senior housing units is
admirable and necessary, the Mayor's
proposal would decimate many of the
accomplishments that community and civic
people have achieved over the years
through our contextual rezonings. Some of
the disturbing features of the proposal
include allowances for taller and bulkier
buildings in certain zoning designations,
and the elimination or reduction of
parking requirements for certain types of
senior housing.

Proceedings

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2 There are many other
3 objectionable features to the proposal,
4 which seems to favor development --
5 developers over the needs and desires of
6 the communities.

7 It seems that, as the proposal
8 is examined more closely, more disturbing
9 components are uncovered. My civic
10 association sent out a petition with our
11 newsletter, and we received back nearly
12 300 signatures from our almost 600 members
13 in opposition to both proposals. We have
14 submitted those petitions to the City
15 Planning Commission Chair as well as to
16 the Mayor and to our local elected
17 officials. And this is a set of them.
18 And they also have whole bunches of
19 comments written on them as well, because
20 a lot of people were not able to come
21 today, and they wanted to express their
22 opinions to you.

23 We also oppose the MIH proposal.
24 Its main objective would require that
25 developers set aside a larger percentage

Proceedings

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2 of new housing units as affordable units,
3 which is good, but this would only be
4 required, from what is my understanding,
5 if the site of the development had been
6 upzoned to allow for more dense
7 development. This would encourage spot
8 zoning, which is harmful to contextual
9 rezoning.

10 We therefore oppose both
11 proposals. My Community Board 11 in
12 Queens voted unanimously against both
13 proposals, Community Board 7 in Queens
14 almost voted unanimously against both
15 proposals, and my Borough President,
16 Melinda Katz, voted against
17 the proposals as well.

18 My civic believes that these
19 proposals must be extensively revised so
20 that our rezoning efforts are not put in
21 jeopardy. As they stand now, they are
22 unacceptable

23 And in closing, I just would
24 like to say the theme today is one size
25 does not fit all. And this is very true

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of these two proposals.

With the parking issue, most people in my area, our seniors still continue to drive. They have their cars and they want to use their cars. If you build affordable senior housing near a transportation hub like Flushing Main Street, those people are going to want parking spaces. They will need them and they will want them. I know it's been said that some of the areas people don't use their parking spaces, but again, that shows that different areas have different needs.

And when we did our contextual rezonings, it took a long time to do that. It took years to do that, and we went neighborhood-by-neighborhood and addressed every community's needs and wants in order to get the proper zoning.

This proposal was introduced in March. It's going very fast, it's very overwhelming, and there's a lot of upzoning involved, and I think it needs to

Proceedings

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2 be revised and looked at more carefully
3 before it goes ahead.

4

Thank you.

5

THE CHAIRPERSON: Thank you,
6 Mr. Euler.

7

Questions?

8

(No response.)

9

THE CHAIRPERSON: Thank you very
10 much.

11

(Applause.)

12

THE CHAIRPERSON: Jean-Daniel
13 Noland. Is he here?

14

COMMR. DOUEK: He's not here.

15

THE CHAIRPERSON: Betty
16 MacKintosh. Betty MacKintosh?

17

(No response.)

18

THE CHAIRPERSON: No.

19

Laura Spalter.

20

MS. SPALTER: Good evening. I
21 Could say that now.

22

THE CHAIRPERSON: Yes, you can.

23

MS. SPALTER: My name is Laura
24 Spalter. I am speaking on behalf of the
25 Broadway Community Alliance, a North

Proceedings

1
2 Riverdale civic group opposed to the
3 Mayor's rezoning plan.

4 Mayor de Blasio's plan will gut
5 years of deliberate and thoughtful
6 community planning that resulted in
7 Community Board 8's 197-a plan, which was
8 adopted by the City Planning Commission
9 and City Council in 2003. That plan
10 resulted in a series of zoning actions to,
11 quote, "preserve the scale and character
12 of area neighborhoods," end quote.

13 Under the current zoning
14 developers of affordable and senior
15 housing can already build taller, denser
16 buildings, with fewer required parking
17 spaces, often to the frustration of their
18 neighbors. I heard this morning that
19 Borough President Diaz said that he has
20 built 17,000 units of affordable housing
21 in the past six years. Thousands of
22 affordable units will continue to be built
23 without this rezoning proposal, that
24 serves to benefit the real estate
25 interests at the expense of our unique

Proceedings

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2 neighborhoods.

3 Buried in the proposal's 1,000
4 pages is the loophole that allows
5 developers to apply to BSA for hardship
6 waivers to avoid every mandate in MIH.
7 Every mandate, including the number and
8 size of affordable units and affordability
9 levels. Also, the current BSA requirement
10 for developers to show why their projects
11 will not alter community character has
12 been grievously eliminated.

13 Another troubling text change
14 undermines our ULURP process by granting
15 the City Planning Commission the power to
16 authorize large-scale apartment buildings,
17 known as CCRC'S, in R1 and R2 residential
18 districts, zoned for single family homes.
19 The plan falsely touts that it will create
20 permanently affordable units. But for the
21 multitude of developers who participate in
22 the state's 421-a program, those
23 affordable units will begin phasing out in
24 25 years.

25 The public has the right to

Proceedings

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2 transparency and a real cost analysis of
3 the Mayor's rezoning plan. How will the
4 City pay for it? What are the costs for
5 promised new infrastructure, schools,
6 transportation, et cetera, all the deals
7 that are being made?

8 There is no free lunch.

9 Inevitably, the needed revenue will come
10 from raising our property sewer and water
11 taxes, along with every other tax that we
12 pay, because believe me, a billion dollars
13 couldn't pay for the combined sewer
14 overflow issues in my community board in
15 the Bronx.

16 Ironically, Mayor de Blasio has
17 succeeded in uniting this City against
18 him. Community boards and borough boards
19 have overwhelmingly voted to reject this
20 plan. Clearly they understand the
21 deleterious impacts caused by transit
22 zones, increased density, unbridled growth
23 of community facilities, and luxury
24 high-rise development. Serious
25 consequences for a questionable gain --

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net gain of affordable units.

Thank you for this opportunity
to speak.

THE CHAIRPERSON: Thank you,
Ms. Spalter.

Questions for Ms. Spalter?

COMMR DOUEK: I have just one.

THE CHAIRPERSON: Yes.

COMMR DOUEK: Thank you for your
testimony. I noticed you've waited the
entire day, waiting patiently, so thank
you.

MS. SPALTER: Since 8:30 this
morning.

THE CHAIRPERSON: Well, you're
with us, so thank very much. Thanks for
spending the day with us.

MS. SPALTER: Thank you.

THE CHAIRPERSON: The next
speaker is Jennifer Klein.

MS. KLEIN: Good evening,
Chairman Weisbrod and Commissioners,
ladies and gentlemen. My name is Jennifer
Klein, and I am speaking on behalf of the

Proceedings

1
2 Riverdale Community Coalition.

3 We endorse the objectives of
4 increasing affordable housing
5 opportunities for senior citizens and
6 families, where appropriate. However, ZQA
7 is deeply flawed, we feel. We object to
8 the proposed changes in the City zoning
9 resolution that would allow six-story
10 buildings, known as continuing care
11 retirement communities, to be located in
12 R1 and R2 low density districts. More
13 specifically we protest an amendment
14 within the Mayor's rezoning plan, ZQA,
15 which would allow the high-rise CCRC
16 proposed by the Hebrew Home of Riverdale
17 on a site more than ten acres to be
18 accomplished by way of a City Planning
19 Commission authorization process, thereby
20 avoiding compliance with ULURP and review
21 of the City Council.

22 This manipulation of the zoning
23 resolution is shocking. By slipping in
24 this provision, City Planning and the de
25 Blasio Administration clearly intend to

Proceedings

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2 facilitate accelerate and ultimately
3 ensure approval of the Hebrew Home CCRC.

4 The Hebrew Home's luxury
5 apartment styled development, which FOIL
6 results show apartments starting at
7 \$725,000, plus a hefty maintenance charge
8 starting at around \$4,500 per month, is
9 hardly what we might expect to find under
10 the Zoning for Quality and Affordability.
11 DCP is seeking to squeeze the project
12 through a loophole that applies only to
13 that project, but will have citywide
14 ramifications.

15 The stakes are high for R1 and 2
16 districts. Unless the Mayor's ZQA
17 proposal is severely modified, we can
18 expect other similar institutions to take
19 advantage of the loophole and similar
20 projects to follow.

21 We believe that the proposed
22 amendments and the consequences of this
23 particular ten acre clause will be the
24 antithesis of what northwest Bronx
25 communities have fought to achieve in our

Proceedings

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2 197-a plan. This would provide an
3 incentive for developers to assemble land
4 in R1 and R2 districts in and out of SNAD
5 districts throughout the City and to
6 build, opening the door to the vastly
7 over-scaled CCRC project now being
8 planned, and those waiting in the wings.

9 The Riverdale Community
10 Coalition believes that, as a fundamental
11 matter apartment buildings are
12 incompatible with and do not belong in low
13 density residential districts, of which
14 there are all too few in the City. We
15 urge the City Planning Commission and City
16 Council to reject the ZQA proposal and to
17 protect the character and scale of our
18 community and other low density areas
19 throughout New York City. Please vote no.

20 And thank you very much for the
21 opportunity to speak. Our counsel, Mr. Al
22 Betzel, was here earlier, and stayed all
23 day, it was an expensive day for us --

24 (Laughter.)

25 MS. KLEIN: -- but he has

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submitted a written testament.

Thank you very much.

THE CHAIRPERSON: Thank you.

Thank you very much, Ms. Klein.

(Applause.)

THE CHAIRPERSON: The next five speakers, we're now going back to those in favor, are Sarah Watson, Jerilyn Perine, Mark Ginsberg, Rosa Barone, I think, and Richard Bass. Jerilyn Perone, pardon me.

So Sarah Watson. Here they come, okay.

MS. PERINE: Can we just switch our order?

THE CHAIRPERSON: Yes. Jerilyn, I apologize for mispronouncing your name. It's been a long day.

MS. PERINE: That's okay. Everyone does, it's all right, it's no worries.

My name is Jerilyn Perine, and I'm the Executive Director of the Citizens housing and Planning Council. And we are the oldest civic and educational

Proceedings

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2 organization in the City that focuses on
3 the concerns of the City's housing stock.
4 Prior to this position I served in
5 government for 28 years, including as
6 Commissioner of HPD between 2000 and 2004

7 Thank you for the chance to
8 testify in support of ZQA on behalf of
9 CHPC.

10 My colleague, Sarah Watson, will
11 be speaking after me, specifically on our
12 study of the building envelope rules, of
13 which she was the co-author. You will
14 also hear testimony of our Board
15 President, Mark Ginsberg, on some of the
16 more critical technical design issues that
17 the new text seeks to address.

18 I want to talk about just one
19 thing. Whether we plan for it or not,
20 whether we like it or not, our population
21 is growing and is likely going to tip nine
22 million people by 2040. As crime remains
23 low and as our City's cultural and social
24 life become more vibrant and diverse and
25 as our economy remains strong, we will

Proceedings

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2 continue to attract those with aspirations
3 and ambitions from all over the world and
4 across all incomes. And we are retaining
5 more of our own population, New Yorkers
6 born here, from the young to the elderly,
7 and for all the same good reasons.

8 Of course, this growth has
9 impacted our historically tight housing
10 market, and the result; those with
11 financial means have housing choices in
12 New York City never before imagined from
13 old tenements and neighborhoods now
14 sporting exuberant street life, to newly
15 constructed high-rises in old industrial
16 areas once off limits.

17 But for those with less income,
18 the choices are virtually nonexistent.
19 They are losing out more and more in the
20 competition for our City's scarcest
21 commodity, a vacant affordable apartment.
22 So now, nearly a quarter of our households
23 share their apartment with either extended
24 family members or unrelated single adults
25 just to keep a roof over their heads.

Proceedings

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2 More than a quarter million people live in
3 illegal units, spaces that are unsafe, and
4 nearly always lacking tenant legal
5 protections. And nearly 60,000 of our
6 fellow New Yorkers are living in homeless
7 shelters and thousands more are on the
8 streets.

9 At the same time, our
10 construction costs are higher than
11 anywhere in the country; even worse, the
12 increasing cost of housing is outpacing
13 the cost of construction as transaction
14 and regulatory burdens further squeeze
15 supply and push prices up. The Mayor has
16 smartly created a housing strategy to both
17 use the City's financial resources to
18 directly subsidize housing, both new and
19 existing, to reach below market
20 households, and has looked for ways to
21 improve regulations to help reduce the
22 cost of development and increase the
23 supply of affordable housing.

24 ZQA is an important part of that
25 strategy, with a bundle of changes that

Proceedings

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2 will update rules, so that already
3 permitted, already permitted FAR, can
4 yield the amount of housing that was
5 intended. It will encourage affordable
6 housing for the elderly and families
7 earning 80 percent of median or less. It
8 will reduce in some cases parking
9 requirements that just increase cost and
10 decrease housing. And it will allow for
11 more efficient housing techniques, like
12 modular construction. And by allowing
13 flexibility in building envelope, it will
14 be possible to improve the interior design
15 of apartments and the exterior design of
16 buildings.

17 Or, we could do nothing, and
18 stand by and watch as the number of New
19 Yorkers who are severely rent burdened or
20 overcrowded continues unabated and as our
21 City becomes essentially unattainable to
22 all but the wealthy or simply those lucky
23 enough to have gotten here first.

24 Thank you.

25 THE CHAIRPERSON: Thank you very

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much, Ms. Perine.

Any questions?

(No response.)

THE CHAIRPERSON: I don't know if this is a question for you or a question for Sarah Watson, but --

MS. PERINE: Probably Sarah.

(Laughter.)

THE CHAIRPERSON: Okay, I'll --

MS. PERINE: Go ahead.

THE CHAIRPERSON: But you heard the testimony, I think, of the Greenwich Village --

MS. PERINE: Some of it, yes.

THE CHAIRPERSON: -- Society for historic Preservation, which essentially, you know, disagrees with what CHPC is -- analysis of why ZQA is needed, and I was wondering if you had any comments or thoughts on that.

MS. PERINE: Well, I'm actually not sure they so much disagreed as they just have their own opinion, which in a way has nothing to do with what we wrote.

Proceedings

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2 I mean, you know, they're correct. I
3 mean, we studied 17 case studies, that's
4 what our study was. We never said it was
5 anything different. We studied them
6 incredibly carefully.

7 We needed architects who were
8 willing to not just provide all of the
9 detail of the calculations of their sites,
10 but then all of the mythical calculations
11 that could have been done had the building
12 envelope rules not been there. So I, you
13 know, I don't know what they did. I know
14 what we did. And of those 17 sites, eight
15 were clearly constrained by building
16 envelope. And yes, some by small amounts,
17 some by large amounts. I mean, we weren't
18 trying to manipulate the information in
19 any way.

20 But I think, you know, the point
21 really is that -- and yeah, a lot of them
22 were -- they weren't all a hundred percent
23 affordable, by the way, on that point they
24 were wrong, but yeah, some of them are
25 irregular sites. And why is that?

Proceedings

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2 Because more and more sites are
3 irregular. I mean, we're not starting
4 with a blank canvas here. We're trying to
5 do work in a city that is largely already
6 built. So, you know, the choices that we
7 have left to us today are not the same
8 choices that were left to us 50 years ago.
9 And if we don't begin to look at our
10 regulatory framework and update it and
11 modernize it, and if you don't think that
12 being able to, you know, do modular and
13 block-and-plank construction makes a
14 difference, well then, fine. But it does
15 make a difference, and it makes housing
16 cheaper.

17 And if you don't think that
18 changing floor-to-floor heights and giving
19 people a little bit more flexibility
20 because they have to include sprinklers
21 and, you know all kinds of things that
22 didn't -- weren't requirements in the
23 mid-eighties when the original regulations
24 were put in place, that's not a criticism
25 of those regulations, those things simply

Proceedings

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2 didn't exist then. They weren't things we
3 were thinking about. And we weren't
4 trading FAR for all kinds of other things
5 that we wanted, like inclusionary.

6 So now that we are doing all
7 those things, you know, you have to look
8 at that framework. And we already have
9 the most expensive transaction costs in
10 the country. I mean, it takes -- I mean,
11 I'm looking at, you know, Michele, you
12 develop housing. I mean, it takes two
13 years, you know --

14 COMMR. DE LA UZ: More.

15 MS. PERINE: -- to even get to a
16 place where you can begin to talk about
17 your project and put your financing
18 together. So that, you know, adds to the
19 cost of housing and it constrains the
20 supply. And if we want to just say it
21 doesn't matter, okay. But what I'm saying
22 is it does matter. Because right now we
23 have a lot of people in this city who are
24 living in dire straits.

25 And so we would not say that our

Proceedings

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2 study was anything more than what it was.
3 We looked at 17 sites. We certainly think
4 it's reflective of what we hear from the
5 industry all the time. And we think it's
6 things that could be changed, and they're
7 sensible changes. These are not, you
8 know, severe or egregious or, you know,
9 you could always go to the outlier and
10 create the most extreme example of what
11 might happen. But for me the most extreme
12 example of what might happen is what I'm
13 talking about. A quarter million people
14 living in illegal spaces. Almost a
15 million households living in shared
16 accommodations because they can't even
17 afford their own place. So to me that's a
18 lot more extreme than a building that
19 might be ten feet taller.

20 THE CHAIRPERSON: I think you
21 answered my question. Thank you very
22 much.

23 (Laughter.)

24 MS. PERINE: Thank you.

25 THE CHAIRPERSON: Sarah Watson.

Proceedings

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2 MS. WATSON: I think she said
3 everything I was going to say, as usually
4 happens also.

5 I was the co-author, so I could
6 answer any additional questions you have.
7 You know, we had really tried to do the
8 envelope study because we had heard from
9 so many people on our board that they were
10 faced with a situation where they were
11 building residential buildings and they
12 were providing less apartments than they
13 know that they could because of the
14 envelope dimensions. So we were trying to
15 find a way to really, you know, capture
16 and highlight this issue that we were
17 hearing everywhere.

18 We got these 17 projects. Out
19 of the eight that were constrained by the
20 dimensions, it was about -- it was over
21 56,500 square foot that was allowed to be
22 built under zoning for floor area that
23 went unbuilt, because of the dimensions,
24 that could have been apartments. So
25 that's very extensive. It was a range of

Proceedings

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2 floor area that was left over, but
3 it was over 56,500 altogether.

4 And what was really interesting
5 about our study is we were very interested
6 in looking at why this was happening. So
7 we went back to the original '87
8 assumptions that the dimensions were based
9 on, and it was just so interesting that --
10 it's just that things have changed now for
11 residential construction. You know, they
12 really -- the dimensions were really based
13 on rectangular regular lots. They were
14 based on lower floor-to-floor heights.
15 The height limits were based on a floor to
16 ceiling height of eight foot, which we can
17 no longer really accept anymore. Plus we
18 have more stuff to put in between the
19 floor and the ceiling today. With modular
20 construction, we need even higher
21 floor-to-floor heights

22 They were really based on
23 construction methods from the 80s. They
24 were assuming like poured in place
25 concrete, which could maximize the

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2 dimensions. And they did they didn't know
3 that they would be using floor area
4 bonuses and deductions so much. And from
5 reading the original information around
6 the dimensions, they did imagine that
7 it -- the envelope could maximize floor
8 area plus have some flexibility for
9 design. I mean, the original
10 environmental study explicitly said that.
11 Like we are designing these dimensions
12 with flexibility. They did not imagine
13 that, you know, it would be such a prime
14 public policy tool to use bonuses and
15 deductions. And for them to have value,
16 there has to be space in the envelope.
17 And it was even recognized back then.

18 So we really believe these, the
19 height increases, the other envelope
20 changes, some courts, rear yards,
21 setbacks, base heights, all the other
22 envelope changes, would really facilitate
23 these things. Facilitate newer
24 construction methods, like modular and
25 block-and-plank. Open up irregular sites

Proceedings

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2 where they can't be developed right now.
3 Allow us to prioritize the quality of
4 apartments, so higher ceiling heights and
5 more efficient layouts, and there will be
6 space for the area around bonus area,
7 floor area bonuses and deductions to
8 actually have value and power. So that's
9 why we are very much in favor of the
10 envelope rules.

11 And I would just like to say, in
12 addition, as well as the Building Envelope
13 conundrum study, our Making Room project,
14 which has really focused on how extensive
15 the single population is, and extreme lack
16 of safe, legal, affordable options for
17 single people, we're very much in favor of
18 the removal of minimum unit size in this
19 text change, and just relying on the
20 building code and ADA to regulate that.
21 And also, reform of the density controls
22 just a little, so there can be a bit more
23 of a range of unit types in a building, as
24 well as smaller options specifically for
25 singles.

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THE CHAIRPERSON: Thank you.

Questions? Ms. De La Uz, and
Ms. Effron after that.

COMMR. DE LA UZ: Sarah, thanks
for giving more background on that. But
it just raises a question. Earlier today
Borough President Gale Brewer, in
particular, raised the point that we
shouldn't be preferring one method of
construction over another as part of
looking at ZQA. And I'm just wondering,
do you believe -- what do you believe the
public policy goal or imperative is to
allow that flexibility to make the room
for the more modern construction methods?

MS. WATSON: Well, I think there
should -- I think there should be the
option. I mean, I think the answer is
that there's a range of options that
people can work on, and that technology
can keep going and keep innovating. I
mean, there will be other methods that
come up. And if the dimensions are so
tight, then there's no room to explore

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2 anything else. So I'm sure there's going
3 to be other innovations in terms of
4 construction coming up, coming forward.

5 I think, from what I've heard in
6 general, you know, it would almost be for
7 a modular construction to flourish you
8 would need sort of even more flexibility
9 on the envelope. I mean, these height
10 limits are mostly not very moderate. And
11 modular construction really needs very
12 high floor-to-floor. But I know people
13 who develop that are happy about these
14 changes at least. But yeah, I think a
15 range and then there just needs to be a
16 landscape of opportunities so these things
17 can keep innovating. And we need to make
18 sure that cost effective construction is
19 prioritized.

20 COMMR. DE LA UZ: Okay.

21 THE VICE CHAIRMAN: Commissioner
22 Efron.

23 COMMR. EFFRON: Thank you. I'm
24 a big fan of Making Room. And, for the
25 record, I think it was in part funded by

Proceedings

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2 the Alcoa Foundation. I just wanted to
3 say that.

4 MS. WATSON: Yes.

5 COMMR. EFFRON: But I'm trying
6 to reconcile what you have described, or
7 your report, with what we saw from
8 Greenwich Village Historical. I just
9 wonder, was there any difference based on
10 the land costs?

11 And it just seems from
12 experience that in higher rent or more
13 luxury oriented development neighborhoods
14 the floor heights on the ground floor are
15 higher already. And is there any way to
16 assess, based on your own analysis of the
17 spaces --

18 MS. WATSON: Right.

19 COMMR. EFFRON: -- whether, in
20 fact, that's happening where luxury
21 development is already prevalent?

22 MS. WATSON: I can't say really
23 from our study; we didn't go into that
24 depth. I can tell you in 17 sites, like
25 one in the highest end areas, they were

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2 projects that included some affordable
3 housing, recent projects that people on
4 our board had worked on. It was
5 predominantly the Bronx and brooklyn and
6 some parts of Northern Manhattan.

7 I imagine, you know, and again,
8 I don't know the detail of the case
9 studies that they put forward, but
10 potentially, you know, if there's a very
11 strong market it's going to carry a
12 different sort of unit anyway, yeah. But
13 we didn't go into that detail for land
14 values. And, you know, it's obviously
15 not -- we're not -- it's not an issue
16 everywhere. It completely depends on so
17 many different things I think tenure is
18 big part of that, and the value of the
19 properties.

20 COMMR. EFFRON: Thank you.

21 THE VICE CHAIRMAN: Other
22 questions for Ms. Watson?

23 MS. WATSON: The size of the lot
24 especially.

25 THE VICE CHAIRMAN: Commissioner

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Cantor.

COMMR. CANTOR: Thank you.

Back to the discussion about floor-to-floor heights.

MS. WATSON: Mm-hmm.

COMMR. CANTOR: Up until maybe 20 years ago, floor-to-floor heights were held down below eight-foot-and-a-half ceilings, then a six-foot floor, and that was it, eight-foot-seven altogether. Yeah, eight-foot-seven altogether.

There came a time when the contracting industry, the real estate industry, decided that more floor-to-ceiling is more marketable, and so they agreed from that dimension all the way up to ten-foot is the norm. By growing it, they also were able to spread out the columns on the building and give you more unencumbered area.

Now we have a new system, if you will, a prefabricated system coming out, which actually came out probably 20, 30, 40 years ago, and at that time it didn't

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2 flourish. It's coming out now, but it is
3 modular, meaning it's a series of
4 rectangles and you stack building blocks
5 one upon the other. That in turn creates
6 another requirement for floor-to-floor, to
7 the floor below and the ceiling. And
8 that's basically the way you've gotten to
9 where you are now.

10 MS. WATSON: With the higher
11 floor-to-floor heights? I mean, I think
12 as well as marketable, I mean, with the
13 affordable housing guidelines, higher
14 ceilings have also become a part of that.
15 So I think, in general, it's kind of a
16 market -- a market change, but actually it
17 was really only quite a small period of
18 time where that eight-foot ceiling
19 was accepted. The Pre-War buildings --

20 COMMR. CANTOR: I'm 60-some-odd
21 years, and I'm telling you it was around a
22 long time.

23 MS. WATSON: Well, we -- I mean
24 we looked to -- obviously we know that the
25 height limits were based on an assumption

Proceedings

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2 of eight-foot floor-to-ceiling, because it
3 was -- that was what in the 1980s, they
4 imagined that was what was going to keep
5 happening. But we looked at the average
6 Pre-War building, and it's something like
7 eleven-foot-six or something was the
8 average. So if you were building a
9 Pre-War building today with the height
10 limits, you would -- you'd have to miss
11 four stories off the top or something like
12 that.

13 COMMR. CANTOR: But those are
14 buildings that had beams sticking out.

15 MS. WATSON: Right, right. And
16 I don't --

17 COMMR. CANTOR: And that hasn't
18 been the custom.

19 MS. WATSON: But I think in
20 terms of the innovation that you're
21 describing in construction techniques, you
22 know, the envelope does need that
23 flexibility so that these techniques, you
24 know, can be embraced and we can really
25 experience the value of them.

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COMMR. CANTOR: Thank you.

THE CHAIRPERSON: Any other questions for Ms. Watson?

(No response.)

THE CHAIRPERSON: Thank you.

MS. WATSON: Thank you.

THE CHAIRPERSON: Mark Ginsberg.

A SPEAKER: Hi, good evening. I will be reading testimony from Mark Ginsberg. He unfortunately could not be here due to a medical procedure, but he sent his testimony.

(Reading:) Chair Weisbrod and Commissioners, thank you for this opportunity to testify. My name is Mark Ginsberg, and I am speaking in support of the ZQA text amendment as President of the Citizens Housing and Planning Council, as a board member of the New York State Association for Affordable Housing and as past President of the AIA New York Chapter, but most importantly as an architect whose practice is largely the design of affordable housing. Others from

Proceedings

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2 CHPC have talked about the importance of
3 this proposal for affordable housing and
4 why it is so necessary.

5 I want to talk about it from a
6 design and urban design perspective. The
7 current contextual envelope creates a
8 strait jacket. In trying to use all of
9 the floor area with no excess envelope, we
10 are shoehorning in spaces and creating
11 buildings that simply follow the
12 dimensions for a new building envelope,
13 restricting the design, apartment quality,
14 and our ability to develop an urban design
15 that responds to the site's context.

16 Below are a few examples of how ZQA will
17 allow us to design higher quality
18 buildings that better fit in the context
19 of New York.

20 Currently, the rear yard setback
21 pushes buildings to the front of a zoning
22 lot that, coupled with setbacks being
23 measured from the street line, forces us
24 to design flat buildings without
25 significant articulation, typically at the

Proceedings

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2 property line. The proposed text, by
3 modifying these provisions, will create up
4 to a ten-foot play in a 60-foot deep floor
5 plate, allowing for greater variation of
6 the facade. And in our written testimony
7 there are diagrams showing this.

8 Outer court dimensions, again,
9 discourage variation in the streetwall and
10 rear yards. They also discourage the
11 traditional building entrances of the
12 1920s to the 50s, through a landscaped
13 court, since under the current regulations
14 the courtyard has to be so wide as to be
15 impracticable.

16 Finally, older buildings often
17 had articulation at the back of the
18 building, a saw-tooth design, to create
19 more window area and efficient plans for
20 deep lots. These saw-tooth buildings are
21 extremely limited under current
22 regulations, requiring the court to be as
23 wide as it is deep. Under the new
24 regulations, we will be able to do what
25 was done in older apartment buildings,

Proceedings

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2 while maintaining a 30-foot distance
3 between windows to provide light, air and
4 fire safety. Current height regulations
5 and the limited envelope we were -- under
6 the current height regulations and limited
7 envelope, we are encouraged to make
8 apartments with a minimum floor-to-floor
9 height of eight foot nine, to pack as many
10 floors as possible in the envelope to use
11 all of the floor area. This creates units
12 that feel dark and cramped and are harder
13 to run required sprinkler lines and energy
14 efficient mechanical systems. In
15 addition, it encourages the creation of
16 commercial space with low ceilings, which
17 are not attractive for many commercial
18 uses.

19 The proposed regulations, with
20 the addition of floor limits and, in most
21 cases, small increases in height will
22 create more commodious units and better
23 commercial space

24 And with regards to parking, our
25 experience has been that for affordable

Proceedings

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2 housing, parking is expensive and makes it
3 harder for new developments to promote
4 good urban design.

5 Frequently, parking is located
6 on the ground floor, for cost reasons.
7 And this prevents commercial uses and
8 other uses, which contribute to lively
9 activity at the street level.

10 Typically, parking is
11 underutilized in affordable housing. We
12 have worked on two NYCHA developments
13 where only 20 percent of the parking is
14 used, and mostly by NYCHA staff.

15 Currently we are designing
16 affordable housing with a school in its
17 base, a design following the ZQA proposal.
18 But if parking was required for the
19 affordable housing, we would lose ten to
20 fifteen residential units, increase the
21 cost of the school, and lose many of the
22 school activities at street level, all in
23 order to create parking that will largely
24 go under-used.

25 By loosening the envelope and

Proceedings

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2 reducing the parking requirements through
3 ZQA in a number of small ways, architects
4 and developers will be able to create
5 better buildings, with greater variation
6 in design that will be better able to fit
7 in with their context and provide better
8 urban design, creating more active
9 streetscapes. For these reasons and many
10 more, we strongly support the ZQA
11 proposal.

12 Thank you.

13 THE CHAIRPERSON: Thank you very
14 much --

15 The next speaker is Rosa Barone.
16 Rosa Barone, from Selfhelp.

17 AUDIENCE MEMBER: She's coming.

18 THE CHAIRPERSON: She's coming?

19 AUDIENCE MEMBER: Yup.

20 THE CHAIRPERSON: Okay.

21 MS. BARROW: Good evening,
22 everybody. My name is Rosa Barrow. I am
23 87 years old. And I'm living in Scheuer
24 House of Flushing, and I'm here to tell my
25 story and why I feel that affordable

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senior houses is very important.

I first lived in Martin Lande House, Selfhelp's senior housing, back in 1993 with my husband. We moved there because my husband was aging, and he used to live -- and he was getting very ill. And we lived in a townhouse, and that had three flights of stairs, in Corona. I was becoming very difficult -- it was becoming very difficult for him to move about.

Martin Lande had elevators and security. So that's why I was glad I moved there. That was very important to us.

We had a great time living in Martin Lande House. We enjoyed the community and the activities that was provided for us. I was very active as a tenant council volunteer. My husband and I are truly -- my husband and I truly enjoyed our friends, our neighbors, because all of them were so nice. With the passing of my husband in 1998, I felt very comforted with my neighbors and

Proceedings

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2 because of the activities and communities
3 I was in in Martin Lande. I was able to
4 grieve for my husband in A more positive
5 way.

6 After 19 living -- after
7 19 years of living there, I moved to
8 Maryland because my mother needed me. So
9 I moved there to be with her, since I was
10 alone at this time. Maryland was a very
11 difficult place for me. It was quiet and
12 I missed my friends. I was also aging.
13 So after a few years living in Maryland, I
14 decided to go back to New York.

15 I applied back to Selfhelp -- it
16 was so good -- Selfhelp and waited for an
17 apartment. I was very fortunate that an
18 apartment was available after two years of
19 waiting, but it was back at Martin Lande,
20 it was much -- it wasn't back at Martin
21 Lande; it was at the Scheuer Housing in
22 Flushing. It didn't matter because it was
23 still the community I was going back to.
24 I still see my old friends.

25 And I truly believe that we

Proceedings

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2 seniors need to have a place where we can
3 feel safe and that there are services that
4 are provided for all of us. It helps us
5 in our daily lives and to become active,
6 whether it's mentally, physically. Living
7 in the Scheuer House of Flushing has given
8 everything to me.

9 Thank you so much.

10 (Applause.)

11 THE CHAIRPERSON: Okay. Thank
12 you very much, Ms. Barrow.

13 The next speaker is -- yes.
14 There's a question, Ms. Barrow.

15 COMMR. DE LA UZ: It's actually
16 more of a statement. First, I just want
17 to thank you very much for coming, I want
18 to thank you very much for -- you and your
19 other residents from the Selfhelp property
20 in Queens, I just want to say thank you
21 for being here. Thanks for sharing your
22 story. We really appreciate it.

23 MS. BARROW: We all appreciate
24 it.

25 THE CHAIRPERSON: Thank you.

1 Proceedings

2 Richard Bass?

3 (No response.)

4 THE CHAIRPERSON: No? Okay.

5 Turning to those who are in
6 opposition, Al Betzel, who I think is
7 gone, Sherida Paulsen.

8 How do you do, Sherida? Good to
9 see you.

10 MS. PAULSEN: How do you do,
11 Mr. Chairman? Good to see you and all of
12 the Commissioners. And I thank you all
13 for staying. It's a long day. And having
14 been through hearings like this myself, I
15 totally respect everything that's going
16 on.

17 My name is Sherida Paulsen. I'm
18 here this evening representing the
19 Riverdale Nature Preservancy, one of the
20 civic groups in the Bronx Community
21 District 8 which opposed the proposed
22 changes to the zoning. So we thank you
23 for the opportunity to speak.

24 I think what's key to understand
25 about our opposition is that Community

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2 District 8 adopted a 197-a plan that was
3 approved by the Commission and the Council
4 in 2003. The results of the 197-a plan
5 were to downzone multiple areas of our
6 community board, downzone to apply
7 contextual zoning to allow for buildings
8 to relate better to the surrounding area,
9 and to improve the special natural area
10 district regulations.

11 Most of the opposition that
12 we've heard, both from our members of the
13 Preservancy and in the community at large,
14 is that the increase in height will result
15 in buildings that are not contextual and
16 do not relate to the surrounding area,
17 that the community district is composed of
18 one of the most diverse housing stocks in
19 the City. We have public housing, we have
20 apartment houses, we have single-family
21 homes. The component of the housing that
22 has drawn the greatest concerns are two
23 pieces, the reduction or elimination of
24 parking requirements. We live in an area
25 where you drive around for a long time to

Proceedings

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2 find on-street parking in our metered
3 zones, which are the business areas, which
4 do not have enough parking. We also have
5 parking garages for apartment buildings
6 that are full. We have a lack of
7 on-street parking. Because we have very
8 narrow roads, there are many streets which
9 are not suitable for parking. So parking
10 is a very deep concern in our neighborhood

11 Lastly, you've heard other
12 speakers from the Bronx, and especially
13 our board, speak about the proposal to
14 allow continuing care retirement
15 communities to be constructed in
16 single-family zones. Continuing care
17 retirement communities are apartment
18 buildings. They are predominantly
19 apartment units. They have a small
20 component that is called health care,
21 which is what you would have called
22 nursing homes in the past. To
23 characterize those facilities as community
24 facilities, not as residential buildings,
25 is incorrect, and to allow for them to be

Proceedings

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2 located in single -- in R1 and R2
3 neighborhoods districts is really
4 inappropriate, I think, in terms of the
5 zoning.

6 So that's the end of my
7 Riverdale Nature Preservancy statement.
8 We oppose. We hope that you will go back,
9 take this back to the Department staff and
10 re-look at a lot of these provisions.

11 Now, as Sherida Paulsen, the
12 past Chair of the American Institute of
13 Architects New York Chapter and former
14 Chair of the Landmarks Commission, and I'm
15 on the New York State Architects Board
16 now, I was one of the -- at one point I
17 had no grey hair -- young architects who
18 tested the quality housing back in the
19 1980s on a Real Estate Board of New York
20 committee and for the Zeckendorfs, for the
21 building that resulted at 72nd and
22 Broadway, and one of the things that has
23 been said here is that the envelope was
24 really designed around the construction
25 techniques in place at that time. I think

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Mr. Cantor was the engineer on some of those projects. And it is true, it is true that the testing did accommodate, barely, the allowable FAR on the sites under that type of construction. But, those buildings were, that zoning was being designed to accommodate and respond to the desire for more contextual buildings. The heights were coming from the outside. And even though it was very difficult to accommodate all of the floor area allowed on a site, there was a recognition that the streetscape, which was the real mandate of this Commission to look at, was the driving factor in developing these height limits.

(Bell rung.)

MS. PAULSEN: Now -- thank you

THE CHAIRPERSON: Please, finish the thought.

COMMR. DE LA UZ: Yeah.

MS. PAULSEN: I think everyone understands that construction methods have changed and that some flexibility to

Proceedings

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2 respond to construction methods,
3 especially when it's related to
4 sustainability, could be desirable.

5 I think what's most frustrating
6 to those of us in -- living in communities
7 where contextual zoning is desirable, is
8 that the loosening of the envelope to
9 accommodate either affordability or these
10 improved sustainable or mechanical systems
11 is not tied to any requirement in the
12 zoning. I think what we've heard from a
13 lot of the people doing strictly
14 affordable or affordable senior housing is
15 that they run into these problems because
16 they're using construction systems that
17 are not the same as your market-rate
18 developers are using.

19 A market rate developer should
20 not necessarily be allowed to go five
21 feet, ten feet or fifteen, whatever the
22 amount is, higher unless they're doing
23 something. And the ZQA, the way it's been
24 drafted to date, doesn't require the
25 developer to do anything. They're just

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2 given a looser sweater. So we would like
3 to see some other things addressing that.

4

THE CHAIRPERSON: Thank you. I
5 do want to say, at least my understanding
6 is that Riverdale is not within a
7 transit-rich zone, so nothing in ZQA is
8 creating or would make existing parking
9 regulations optional.

10

AUDIENCE MEMBER: The Number 1
11 train.

12

THE CHAIRPERSON: I'm just
13 saying, in our --

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MS. PAULSEN: Actually, in
15 the --

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THE CHAIRPERSON: -- our
17 configuration, it is not within, as we
18 have defined it.

19

MS. PAULSEN: In the maps -- in
20 the maps that were presented to our
21 community board there were transit
22 district areas that extended --

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THE CHAIRPERSON: I don't --

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MS. PAULSEN: -- up Broadway,
25 yes, within our community board.

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THE CHAIRPERSON: Not within Riverdale, is my understanding.

AUDIENCE MEMBER: Yes, yes, North Riverdale.

MS. PAULSEN: The Riverdale Nature Preservancy represents a larger area. And we are Riverdale, Kingsbridge, Knightsbridge; it's a larger area.

THE CHAIRPERSON: Well, if it's a larger area, I understand.

MS. PAULSEN: But it is -- it is a --

THE CHAIRPERSON: But Riverdale itself.

MS. PAULSEN: -- concern along Broadway and other areas.

And I'm glad you raised that part, because one of the things that we would ask about looking at the transit zones is that our topography is rather dramatic. And one of the things that we noted was that the boundaries of the transit zones extend to 242nd Street. 242nd Street has to -- you have to go up a

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2 very steep set of stairs to get to the
3 platform, it is not elevator-accessible;
4 therefore, it's not really a great transit
5 measurement.

6 THE CHAIRPERSON: Thank you,
7 Ms. Paulsen.

8 MS. PAULSEN: Thank you.

9 THE CHAIRPERSON: Any questions?

10 Yes, from Ms. Levin.

11 COMMR. LEVIN: I have a question
12 about the CCRC issue and --

13 MS. PAULSEN: Yes.

14 COMMR. LEVIN: -- I don't --
15 it's late in the day, and I don't have the
16 text in front of me, but I believe that
17 the text that -- the draft text that we
18 are considering on the ten-acre site, you
19 know, has certain thresholds and certain
20 buffers that are meant to be surrounding,
21 you know, this larger apartment building,
22 and it's admittedly an apartment building.

23 Are those protections, are you
24 saying that the buffer is not good enough
25 or that you just don't want to see an

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2 apartment building in a single-family
3 house zone?

4 I mean, what's the harm if it's
5 on a large site and isolated and
6 protected? How does that damage the
7 context?

8 MS. PAULSEN: It damages the
9 context by virtue of the fact that these
10 are tall buildings, the buffers are
11 totally inadequate. I invite you to come
12 to the area and see why everyone in the
13 neighborhood and the surrounding community
14 board adopted multiple resolutions
15 objecting to any possibility of developing
16 anything that looked like an apartment
17 building in these areas. And I think the
18 context for that is that going back to the
19 1950s and 60s when Gil Kerlin led the
20 Preservancy, there has been ongoing effort
21 to keep the denser development away from
22 the more open single-family areas. And
23 this would immediately impact that
24 neighborhood. The buffers really are
25 quite meaningless when you go to the site.

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2 COMMR. LEVIN: Okay, thank you.

3 MS. PAULSEN: You're welcome.

4 THE CHAIRPERSON: Any other
5 questions for Ms. Paulsen?

6 (No response.)

7 MS. PAULSEN: Thank you.

8 THE CHAIRPERSON: Thank you.

9 (Whereupon, Nicole Ellis
10 replaces Kari L. Reed as the hearing
11 reporter.)

12 THE CHAIRPERSON: Barika
13 Williams. Barika Williams? Oh, there she
14 is, okay.

15 Now, good evening.

16 MS. WILLIAMS: Hi, good evening,
17 yeah. Solid and legitimate, no questions
18 there.

19 So good evening, Commissioners,
20 and to everyone who is still in
21 attendance. My name is Barika Williams,
22 I'm the Deputy Director at ANAHD, the
23 Association For Neighborhood and Housing
24 Development. We're a membership
25 organization of more than 100 non-profit

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2 community-based organizations that work on
3 affordable housing and economic
4 development across all five boroughs.

5 ANAHD members have developed over 100,000
6 affordable housing units in just the past
7 25 years, they manage 30,000 affordable
8 housing units currently, and our groups
9 play a key role in almost all City housing
10 advocacy and organizing.

11 For us, I'm here today to
12 testify on MIH, on the Mandatory
13 Inclusionary Housing. ANAHD feels that
14 the proposal does not reflect or
15 adequately serve the diverse range of
16 incomes in populations or local
17 communities in the City, and therefore,
18 absent substantial changes that would
19 guarantee truly affordable housing -- do
20 you all have the testimony? Do you all
21 have copies -- absent that would -- absent
22 substantial changes that would guarantee
23 affordable housing, truly affordable
24 housing, and that meets the City's overall
25 needs, we cannot support the Mandatory

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Inclusionary Housing proposal as it is.

I'm not going to read exactly from my testimony 'cause I know it's been a long day for everyone. I'm going to hit some high points and try to speak to some things that you guys might not have heard throughout the day.

So specifically ANAHD has played a leading role in getting Mandatory Inclusionary Housing thus far. We were one of the central groups in calling for MIH dating back to 2004, when we had the Fourth Avenue rezoning in Brooklyn. ANAHD led many of the mayoral campaign debates and put inclusionary housing as some of the campaign topics to understand where people were and their positions on them, as have many of our groups, right? This has been a central issue for us for at least a decade now, and it's been all of -- one of our key things to see and push for. For us, we see this as an opportunity to create really a new normal in how we build and develop over time for

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2 the City, to create a new baseline of how
3 we grow over time.

4 The concern, though, however, is
5 that this proposal does not necessarily
6 meet those needs, right? And thinking
7 about putting in place a proposal that
8 actually addresses the goals of creating
9 both a more inclusive city, affordable
10 housing units that help address our
11 affordable housing crisis, and something
12 that is feasible and sustainable in
13 neighborhoods over time.

14 So ANAHD has done extensive
15 research on this. We have looked at our
16 voluntary policies, our ten policy, the
17 proposal, we're probably one of ten people
18 in the City besides agency staff who have
19 read the full 800-page Financial,
20 Feasibility and Market Study and done an
21 entire analysis on that. We also are in
22 regular communication with pretty much
23 every other city in the country who has
24 some form of inclusionary Housing program
25 and regularly talk with them about how

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2 their program is structured, how they
3 would revise it lessons learned, the best
4 practices, et cetera.

5 We have a specific set of
6 recommendations for this proposal.
7 Specifically, though, our key issue is
8 looking at how to frame and get deeper
9 affordability within Mandatory
10 Inclusionary Housing. So our five
11 recommendations are to create a deeper
12 affordability options, that a 30 percent
13 set-aside at 30 percent AMI -- I can dive
14 into these as you all like;

15 To also require that all options
16 have a band that is set aside for a
17 15 percent set-aside within the
18 affordability, also at 30 percent AMI;

19 To eliminate the option that is
20 an entire Option 3, that's the 30 percent
21 at 120 set-aside. I know you've all heard
22 about that one previously in previous
23 testimony;

24 To increase the number of
25 options overall to have a minimum of five

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2 options so that there's more flexibility
3 in what can be applied neighborhood by
4 neighborhood;

5 And to also increase the
6 off-site requirement, so that when
7 building off-site housing you would be
8 required to add an additional 10 percent
9 of affordability. So if you're opting out
10 of the inclusiveness of MIH, that you have
11 to then create 10 percent additional
12 affordable housing.

13 (Bell rung.)

14 MS. WILLIAMS: Oh, wow. Okay,
15 so I'm happy to delve into any of those.

16 THE CHAIRPERSON: You're on a
17 roll.

18 I do have a question. You
19 probably -- I don't know if you were here
20 for a number of people who testified that
21 they had looked at other mandatory
22 programs around the country and that the
23 New York proposal was the most rigorous
24 that they had seen. And I'm wondering,
25 since you've also looked at other programs

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2 around the country, whether you found any
3 that were more rigorous than New York's?

4 Ms. WILLIAMS: So I would say
5 that there's -- there's two ways to answer
6 that question. One is whether -- I would
7 not challenge that -- in any way, shape,
8 or form that New York is not the most
9 rigorous in terms of the set-aside
10 percentages and the projected number of
11 units that it creates. Partly because of
12 our volume, right? We produce 180-190,000
13 units every ten years, which is vastly
14 outpace of anywhere else in the country.
15 But, yes, our 25 and 30 percent set-aside
16 numbers are much higher than many other
17 places that we see in the country.

18 However, I would challenge that
19 New York has a unique and different
20 population and demographic context than
21 many other cities. We have a large income
22 stratification that you do not find as
23 much in other cities, and so serving at
24 deeper AMI levels and the spread up to
25 high AMI levels is not necessarily the

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2 same as what you would see in other
3 places, right.

4 THE CHAIRPERSON: So which
5 cities would you say didn't have a same
6 level of poverty or housing stress or rent
7 stress or high rental that in any way was
8 actually remotely comparable to what New
9 York is proposing?

10 MS. WILLIAMS: So, I mean, I
11 would look at -- I would think about,
12 right? The original proposal, the first
13 Inclusionary Housing program in the
14 country is Montgomery County, Maryland.
15 They do not have the same sort of radar,
16 120 AMI range is about \$110,000, down to
17 our 30,000 -- our 30 percent AMI from
18 20 through 30,000 dollars, right? That's
19 a big band. Their range for Montgomery
20 County in Maryland, I'd say is, if I had
21 to ballpark it, probably half to
22 three-quarters of that. They don't have
23 as big of a stretch between their medium
24 to their high and their medium to their
25 low.

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2 Similar things we see in other
3 places. Fairfax County, Virginia has one.
4 Washington, D.C. has more of a stretch,
5 but not as extreme of a stretch,
6 especially not as extreme of a stretch
7 where it's applied.

8 Let's see, where else?

9 THE CHAIRPERSON: Well, I think
10 is a given that, you know, suburban
11 counties will not necessarily have the
12 same demographics that New York does.
13 But, if you look at is there another large
14 city in the country, most of which, if not
15 all of which, does have similar income
16 distributions as New York does that have
17 as remotely a rigorous a program as New
18 York has proposed?

19 MS. WILLIAMS: Well, I guess I'd
20 say it's not a -- looking at New York
21 City's income bands compared to other
22 cities would be similar, but New York
23 Metropolitan area, which is what our AMIs
24 are calculated on compared to other AMI
25 areas, really the closest comparable to

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2 New York is San Francisco and their metro
3 area. When you start looking at, right,
4 the wealthy areas around Chicago City are
5 not anywhere near extreme in terms of
6 their wealth compared to wealthy
7 neighborhoods around New York City, right?

8 Those wealthy neighborhoods that
9 surround the City skew our AMI levels up.
10 It sort of stretches out how far, right?
11 So is this making sense? In terms of how
12 far our AMI reaches. We've got probably a
13 \$100,000 swing within there, and other
14 places they don't necessarily have that
15 big swing in what they've got to serve
16 between 100 and 120 AMI down to 30.

17 THE CHAIRPERSON: It would be
18 helpful if you could submit that survey to
19 us. Thank you.

20 MS. WILLIAMS: All right.

21 THE CHAIRPERSON: Thank you.

22 Any other questions?

23 Ms. Ortiz.

24 COMMR. ORTIZ: Hi, how are you?

25 Thank you for your testimony,

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2 and I appreciate all the research that you
3 have done.

4 You know, some of the things
5 that have come up for me today, you know,
6 reflect this sort of aspiration for deeper
7 affordability. I think, you know, we all
8 recognize that is a real need and we also
9 recognize that, you know, a regulatory
10 framework only gets us part of the way
11 there, it's part of a much bigger picture,
12 and that we've got to use every single
13 tool in our toolbox.

14 So one of the things that came
15 up is that, you know, this is a floor and
16 that the possibility for deeper
17 affordability, particularly in weaker
18 market environments, would require
19 additional subsidy that the City, you
20 know, has indicated they're prepared to
21 provide.

22 How does that play into sort of
23 your thinking? 'Cause it seems like we
24 will be able to get at deeper
25 affordability in some of the markets where

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2 we need it and communities will be able to
3 negotiate for that. We're not taking that
4 away but we're creating a floor here where
5 we're going to have a lot of more units,
6 you know, and then the no-action scenario
7 is no units.

8 I mean, you know, how do you
9 reconcile that?

10 MS. WILLIAMS: So I think -- I
11 think we would push back on sort of the
12 framing of it's this action or no action,
13 right? We also think that there's an
14 action in between that to make this better
15 and have that actually be the end action.

16 I think also all of -- to go
17 back to our proposals, our proposals fit
18 within the Financial Feasibility Study, so
19 it's within the frame of what the study
20 considers financially feasible in the
21 various different five markets and the
22 thousand different scenarios that are in
23 there.

24 I think the concern would be
25 that there is a difference between doing

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2 deeper affordability levels in MIH and
3 just committing to them as things you get
4 out of other programs and subsidies.

5 So these programs come with 30-,
6 40-, sometimes 60-year affordability
7 limits. Our inclusionary housing program
8 is currently affordable. These other
9 programs are things that are commitments
10 that the City is making in individual
11 instances, which this current
12 Administration is going to do but cannot
13 necessarily be guaranteed over time. And
14 this is a policy that we're thinking about
15 lasting 30 years, 40 years, 50 years,
16 right, over the longer term.

17 Administrations are going to
18 change, so the question is, how are there
19 some of continual guarantees that span
20 across administrations to get deeper
21 affordability?

22 And I think the last thing would
23 be also that communities are looking --
24 that it does not communicate to
25 communities, that they are -- that this is

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2 a priority, right? When the deep
3 affordability comes as the additional
4 piece that comes out of the subsidy and
5 regulation from City -- from the City, it
6 doesn't communicate to neighborhoods and
7 to residents; that 30, 40, 50 percent AMIs
8 are an integral part of how the City
9 thinks about mixing incomes in their
10 neighborhoods.

11 COMMR. ORTIZ: I guess I would
12 ask, you know, one of the things that's
13 come up is that, you know, deeper
14 affordabilities are more difficult to
15 finance, you know.

16 MS. WILLIAMS: Right.

17 COMMR. ORTIZ: And that we are
18 trying to do something that's citywide and
19 that we are dealing with sort of cyclical
20 markets, where things go up and down, and
21 we don't want to create a situation where
22 we're making development infeasible.

23 MS. WILLIAMS: Right.

24 COMMR. ORTIZ: Because, you
25 know, 20 percent of zero is zero, you

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2 know. So people have mentioned in the
3 historical context of New York and, you
4 know, there are times when we weren't
5 getting development, we're at a different
6 time, these things are cyclical and I
7 recognize this is very challenging but,
8 you know, is there a comprise?

9 Ms. WILLIAMS: I think what
10 we're trying to propose is not the
11 solution that is necessarily perfect for
12 everything, right? We are very much
13 articulated in everything that we have
14 said to all of our groups. MIH is not
15 going to solve all of any neighborhoods
16 affordable housing crisis. It is a tool
17 in the toolkit; it is one piece. It is
18 not going to get anyone to a hundred
19 percent of the finish line of what they
20 need. We want to make that absolutely
21 clear. It's just not realistic to put
22 that much weight on a single tool. It's
23 just not going to happen, right?

24 We know that deeper
25 affordability is hard to finance. We have

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2 lots of groups who would love to figure
3 out how to do a hundred percent of
4 30 percent AMI building. It just doesn't
5 cash flow over time, right? It just
6 doesn't work. At the end of the day --
7 right, Michelle is like, it doesn't cash
8 flow at day one, right?

9 At the end of the day, we have
10 units and residents and buildings that are
11 falling into disrepair. We don't want
12 that, our residents don't want that, our
13 groups don't want that, right?

14 So I think the question is, A,
15 for us, this is -- we see this financially
16 also as an opportunity to leverage some of
17 those deeper affordability units that
18 communities want. It's not necessarily
19 going to be all of them, it's not going to
20 mean everything, but it is an opportunity
21 to get some of them.

22 And then the other thing is
23 we're not necessarily saying that these
24 options have to go into place in every
25 single community. We intentionally did

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2 not step outside of the City's framework.
3 This would be an option that would be on
4 the table for any neighborhood. And
5 furthermore, we'd push that we think that
6 this fits more in line with thinking about
7 a long-term permanent policy that spans
8 decades in New York City, right? You can
9 think about the City would have to pour a
10 lot more money in in East New York or in
11 Jerome or in some of the neighborhoods
12 that are first up for the rezoning that
13 are on their mind; those 15 neighborhoods
14 that they know are coming up. But there's
15 a lot of neighborhoods in our future that
16 we weren't thinking about 25 years ago
17 about rezoning, right? So do we have
18 options in the plan for when those happen,
19 right?

20 So if Chinatown were to be
21 rezoned tomorrow and they wanted deeper
22 affordability and they have space for a
23 lot of density, and they are a very
24 high-to-high market, do we have an option
25 that sort of fits that? And we should

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2 really have a full menu of options in the
3 policy upfront, because one of the things
4 that we know from everywhere else in the
5 country is once you set your policy, it's
6 very hard to reopen it. Reopening it
7 opens up everything; it basically starts
8 the negotiations over from scratch. There
9 are other places that say our payment-in-
10 lieu is wrong, our set-aside is wrong, our
11 this is wrong, and we just can't adjust
12 it, because if we did that the whole thing
13 would fall apart.

14 COMMR. ORTIZ: Thank you.

15 THE CHAIRPERSON: Ms. De La Uz.

16 COMMR. DE LA UZ: Barika, thanks
17 for being here and thanks for representing
18 ANAHD so well.

19 I think the other point is that
20 in terms of why it's important or why
21 ANAHD believes that deeper affordability
22 in MIH -- it seems the difference in
23 permanent affordability verses no deeper
24 affordability -- but what I wanted to ask
25 you was, you listed the five specific

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2 recommendations and you started to touch
3 on through what you were just saying, I
4 think, the second one which was of having
5 a portion of 15 percent at 30 percent.

6 Could you talk a little bit
7 about that and why that is important.

8 MS. WILLIAMS: I know you all
9 have heard a lot throughout the day about
10 deeper affordability and the numbers, but
11 I think one of the challenges is when you
12 look at the numbers, when you look at the
13 population for New York, we're not
14 actually not that rich of a city -- it may
15 seem like when you go get a sandwich and
16 everything else -- but 50 percent of the
17 City is below 60 percent AMI. That's the
18 bulk of the population, 86 percent of the
19 rent burden is below 60 percent AMI; those
20 are the folks who are having trouble
21 paying rent.

22 Our numbers of units that are
23 high-income that are being created \$2,000,
24 \$2,500 rents, they're increasing by 20, 25
25 percent. \$2,500 rents are increasing by

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2 35 percent every three years, right? Our
3 units down at \$1,000 are decreasing by
4 13 percent, that's a shrinking pool, and
5 thinking about how this links to
6 homelessness, how this links to senior
7 housing, that's a growing pool of our
8 population. So as we think about -- I
9 mean, I truly believe it's about a
10 mixed-income policy. It's very difficult
11 then to look at thinking about a
12 mixed-income policy that doesn't create
13 guaranteed units for a big chunk of the
14 population, right?

15 If we're mixing from 60 percent,
16 and I know it's an average, so, right?
17 There's some below 60 percent, but there
18 is a lot of possibility for this MIH
19 policy to play out in communities with
20 units at 60 percent and up, up to market,
21 and no guarantees for communities that any
22 units would be created below that. And I
23 think that's very problematic both in what
24 it communicates in terms of who our
25 population is and who is fully being

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mixed, right?

It's not enough to just say mixing income at a certain level and higher; we've got to mix the full range of incomes and create guarantees that there are places for everybody at all of these levels, and I know it's difficult, I know the financing is hard, but I think that this is a place where we can do some of it. And it's -- that 15 percent set-aside at all these bands isn't going to get us a hundred percent there, but then as you're doing a rezoning in your neighborhood right, if you're a senior you can think about say, it's not as much as I would want but I know there is some housing going up in the neighborhood rezoning and the site rezoning, that would be available to me, to my neighbor, to my friends, right? And I think that's really critical for how people evaluate these projects and these rezonings in their neighborhoods.

THE CHAIRPERSON: Ms. Efron.

COMMR. EFFRON: Thank you. It's

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2 all very interesting and, granted, that
3 it's only one tool in the toolbox.

4 MS. WILLIAMS: Correct.

5 COMMR. EFFRON: But I wonder
6 where public housing, or NYCHA in
7 particular, fits into this because many of
8 the sites that we have seen where there's
9 been large-scale discussion about
10 affordability, they've been either
11 adjacent to or really close to public
12 housing sites and a lot of the available
13 sites are so does that fill in the
14 spectrum of affordability as far as you're
15 concerned?

16 MS. WILLIAMS: I don't think
17 NYCHA really fills in the spectrum. First
18 off, NYCHA probably has a four-year plus
19 waiting list on it, so it's very hard for
20 it to be a fill-in for anything. But
21 second off, I think the affordability
22 levels that we're thinking about actually
23 would help, those deeper affordability
24 levels would help create the continuum
25 from NYCHA to up to market-rate, right?

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Same thing with there was just recently a piece, there's a series on NPR about homelessness in New York City, and there's a woman who was talking about having a voucher that she could use coming out of homelessness to find an apartment. She got to the end of her expiration period; she couldn't use her voucher 'cause she couldn't find an apartment where she could rent, right?

So we've got to have those units that are \$1,100, \$1,300, \$1,500 for people to transition into, so that they have somewhere to go.

THE CHAIRPERSON: Ms. Ortiz.

COMMR. ORTIZ: Hi, I'm obviously enjoying this conversation.

So I'm curious about your thoughts because we heard two things today, Kathy Wylde sort of mentioned that, you know, she's aware of a number of businesses that have expressed concern about the lack of affordability, not at the lowest bands but at these

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2 middle-income bands that there's not a lot
3 of subsidy to support and this goes some
4 of the way to addressing that issue. And
5 then Colvin Grannum from Bed-Stuy
6 Restoration also mentioned that CDCs like
7 his that have staff that are making \$40,
8 \$50, \$60,000 a year, very middle income,
9 live in New jersey. And that obviously
10 there's a need from an economic
11 development standpoint, a citywide
12 standpoint, to ensure that there's housing
13 at that band.

14 Does ANAHD have a stand on that
15 issue?

16 MS. WILLIAMS: Yes. So I'll
17 take your second point first, which is,
18 some of this is the struggle of what we
19 call middle income verses what is. So
20 those 40, 50, 60,000 dollar a year folks
21 are actually in very low income, sometimes
22 extremely low income, and moderate income
23 they're not in middle income, right? So I
24 think that's just a challenge that we
25 encounter every single day.

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2 Middle income is 90 and 100,000
3 dollars and up, right? And that's not
4 what a lot of us think of, but that's
5 actually the way the numbers work in terms
6 of the buckets as they are defined, right?

7 I think we recognize that
8 neighborhoods have different needs, right?
9 And so we try to say and think about,
10 there are places where one of their key
11 priorities is those 100, 120, 110 percent
12 AMI units because they're in a Manhattan
13 market where average rents are \$4,000,
14 right? And they can afford a \$2,000,
15 \$2,300 apartment, rents that they see
16 disappearing.

17 We intentionally did not say no
18 units get created at 100, 120 percent AMI
19 levels. We think there's space to do that
20 in the way that the City structured their
21 AMI averaging, which is something that
22 ANAHD and many other groups have called to
23 be replicated, even before the City did
24 it, at the federal level, right? To have
25 more space, to not just be locked in at

Proceedings

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2 exactly at 60 percent AMI, exactly at
3 80 percent AMI, because there are people
4 who fall in between all of those, right?

5 So I THINK the question is, is
6 in thinking about the mixed incomes, are
7 we only creating units at one place -- are
8 we only creating units at 30? Are we only
9 creating units at 120? Are we only
10 creating units at 80? We think there's a
11 way and a structure within this to serve
12 those different levels without excluding
13 the other levels.

14 COMMR. ORTIZ: So, if I could
15 state, the priority here is an option that
16 addresses the lowest income bands?

17 MS. WILLIAMS: Yes, and to
18 create some guarantees that units will be
19 created at those bands.

20 COMMR. ORTIZ: Okay, thank you.

21 THE CHAIRPERSON: Any other
22 questions for Ms. Williams?

23 (No response.)

24 THE CHAIRPERSON: Thank you.

25 MS. WILLIAMS: Thanks.

Proceedings

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THE CHAIRPERSON: Madeline

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Mendez.

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(No response.)

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THE CHAIRPERSON: Okay. Going

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back to those in favor, Sandy Myers.

7

Sandy Myers?

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MS. MYERS: Coming. Hello,

9

everyone, good evening.

10

THE CHAIRPERSON: Good evening.

11

MS. MYERS: My name is Sandy

12

Myers, I'm the Director of Government and

13

External Relations at Self-Help Community

14

Services. I'm going to summarize my

15

comments since you had the opportunity to

16

hear from three of our clients and I think

17

those stories say it all, as I'm getting

18

some nods.

19

So I just want to highlight a

20

few statistics, some stories from our

21

housing program, and just be on the record

22

stating our support for ZQA.

23

So as many of you know,

24

Self-Help operates seven sites of senior

25

housing in Queens, we also have two under

Proceedings

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2 construction currently in the Bronx and
3 Brooklyn, and we also have a model where
4 we combine sites with services. So we
5 have social services onsite, healthcare
6 services; as you started to hear from the
7 clients, that really leaves a difference
8 in their lives.

9 So Self-Help has approximately
10 4,000 people on our wait list at any given
11 time and an average 11-year waiting period
12 for our sites, which is really
13 unfathomable. As you heard from many
14 people, oftentimes when you're dealing
15 with older residents 11 years is a really
16 long time to wait, if they are able to
17 wait that long. So we really see the need
18 in our sites to develop more housing.

19 As you started to hear, by 2030
20 we know that seniors -- that older adults
21 will count for 20 percent of New York
22 City's population, so now is the time to
23 really start addressing this.

24 Similarly, one in five New
25 Yorkers lives in poverty, which is under

Proceedings

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2 \$11,000 a year, and many try to make ends
3 meet on Social Security alone, which is
4 certainly the case for a number of our
5 clients. And as I'm sure many of you are
6 familiar with the recent Citizens Budget
7 Commission report found that single
8 seniors are among the most rent-burdened
9 of the populations in New York City.

10 So with the insufficient supply,
11 a lot of seniors, like our first client
12 that you heard from, are forced to live in
13 unsuitable conditions, either in basement
14 apartment, situations where they don't
15 have a pleasant relationship with their
16 landlord, in walk-up buildings, apartments
17 that are too big to maintain or too small
18 to have the appropriate equipment that
19 they need, whether it be a wheelchair or
20 walker. So we certainly feel the need.

21 We're also proud to partner with
22 LiveOn New York, who you've heard from
23 what feels like years ago at this point,
24 heard from Bobby Sackman earlier today.
25 We're proud to partner with the Affordable

Proceedings

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2 Housing Coalition and support the findings
3 of that study as well.

4 So with that we're urging many
5 of you, the City Council, all of our
6 elected leaders to keep the needs of
7 seniors in mind when weighing these two
8 options with the ZQA in particular.

9 So thank you.

10 THE CHAIRPERSON: Thank you,
11 Ms. Myers.

12 Questions?

13 (No response.)

14 THE CHAIRPERSON: Thank you.

15 Next three speakers, Richard
16 Barth, Claire Haaga-Altman, and Christine
17 Berthei.

18 Welcome back, Richard.

19 MR. BARTH: Thank you. Thank
20 you. My testimony was going to say good
21 morning, but I guess that was a little
22 optimistic.

23 (Laughter.)

24 THE CHAIRPERSON: Well, you
25 might be able to say good morning if you

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waited a little while.

(Laughter.)

MR. BARTH: With the way it's going, you may be right, Chairman.

I am pleased to appear before you to testify in support of both of the proposed text amendments. As many of you know I served in several capacities at City Planning. Most recently as Executive Director for 12 years, I'm currently a Senior Advisor for Land-Use and Housing Strategies at Capalino & Company, with a specific focus on affordable housing. In this capacity I've assisted both not-for-profit and for-profit entities in conceiving and implementing mixed-income and affordable housing projects, and this more recent experience has given me additional perspective on the importance of these proposals now before you.

During my tenure at City Planning, I was involved in helping to create the previous inclusionary housing text amendments and applying them in many,

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many area-wide rezonings adopted over the past 15 years or so. We always sought to make the use of the inclusionary program as compelling as possible, and nevertheless, despite of it's success, certain developments within these rezoned areas have proceeded without an affordable housing component. Even when I was at City Planning our analysis, as well as through subsequent discussions with developers, have demonstrated the part of the program -- demonstrated the use of the program was constrained in part, I believe, by overly restrictive height limits in certain contextual districts.

As you know, outside of these areas that were rezoned, affordable housing has not been required or incentivized on many individual projects that have come before you for action.

So therefore I think a mandatory program is extremely important, will help to address our affordable housing crisis -- through -- our affordable

Proceedings

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2 housing crisis.

3 MIH also establishes regulatory
4 predictability by allowing projects to be
5 planned and financed without the added
6 uncertainties of negotiated mandates for
7 affordable housing. I think despite some
8 of the testimony today, I think this
9 predictability is extremely important for
10 a thriving housing market going forward.
11 It provides clear rules on the amount of
12 floor area devoted to affordable housing
13 and the target AMIs.

14 I also want to lend my support
15 in support of the ZQA text amendment. I
16 certainly appreciate the many concerns
17 that have been expressed during the public
18 review process, and actually enjoy that
19 I'm on this side of the table as opposed
20 to your side --

21 (Laughter.)

22 MR. BARTH: -- given the scope
23 of what you're attempting to do, but
24 having been involved in a number of
25 citywide text departments, I understand

Proceedings

1
2 the challenges of really balancing the
3 important goals with the concerns you've
4 heard throughout the day today.

5 The renewed focus on affordable
6 housing and the growing population and
7 demographic changes that are underway have
8 made the goals and the regulatory changes
9 embodied in these proposals even more
10 critical. We face a crisis in these
11 proposals go a long way toward meeting a
12 variety of housing needs in the future.

13 Now I don't want to leave this
14 podium without at least mentioning the
15 issues surrounding height. Height is
16 one of the third rails of zoning, parking
17 could be the other, maybe density is the
18 other; I mean, there's lots of third
19 rails. But height and parking certainly
20 are truly controversial, and people feel
21 very heartfelt about these issues.

22 In my capacity at City Planning,
23 I was involved over the years, for much of
24 my career, with establishing different
25 height limits in different situations,

Proceedings

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2 from quality housing, to lower density
3 rezonings, to the many contextual
4 rezonings that we undertook in the past
5 10 years or so. And I recognize the
6 concerns of residents regarding proposed
7 changes to heights. And I suppose heights
8 are in the eye of the beholder as to
9 whether they are good or bad, but it's my
10 view based on the experience I've had,
11 that this five-foot increase is really
12 imperceptible, and it would in no way
13 undermine the integrity of the
14 neighborhood rezonings that we undertook
15 jointly over the past 10 to 12 years.

16 Wrapping up, I urge you to
17 support the significant text amendments,
18 and I thank you for the opportunity to
19 testify.

20 THE CHAIRPERSON: Thank you for
21 your patience and willingness to come
22 today and wait.

23 MR. BARTH: Absolutely.

24 THE CHAIRPERSON: Questions for
25 Richard?

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(No response.)

THE CHAIRPERSON: Thank you,
Richard.

Claire Haaga-Altman.

MS. HAAGA-ALTMAN: Good evening,
Mr. Chairman and members of the
Commission. I'm focusing my statement
today on text changes in the Zoning for
Quality and Affordability proposal that
affect the range of senior housing
options. I serve as a Director of
Affordable and Supportive Housing and
Development at Capalino & Company along
with Richard Barth, where our group
assists not-for-profit and for-profit
organizations in developing affordable
housing.

As a not-for-profit developer of
affordable housing for 30 years-plus, and
before that a pioneer in the field for
accessible transportation for the elderly
and handicapped, I have firsthand
experience on how important it is to
reduce regulatory barriers to creating

Proceedings

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2 affordable, accessible, high-quality
3 housing for New York's large and growing
4 senior population.

5 Everybody has mentioned most of
6 the things that I would mention today, but
7 I would just highlight that these zoning
8 text amendments on the senior housing
9 front are particularly important in that
10 they create a zoning definition of
11 affordable independent residence for
12 seniors to allow a wider range of
13 not-for-profit and for-profit
14 organizations to provide affordable senior
15 housing.

16 They redefine shared facilities
17 in senior housing complexes. Creating the
18 new long-term care facility term to apply
19 to assisted living and nursing homes and
20 continuing care retirement communities
21 will go a long way to reducing a lot of
22 confusion, particularly when you go to the
23 State for a license; permitting long-term
24 care facilities in our 3 to our 10
25 districts as-of-right, and this small

Proceedings

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2 increase in FAR for affordable independent
3 and long-term care residence by 20 percent
4 for seniors over what is currently
5 permitted; reducing the restrictions on
6 mixing affordable independent senior
7 residences for seniors with other
8 community facilities on the same zoning
9 lot; and reducing the minimum unit sizes
10 to less than 400 square feet; and finally,
11 reducing parking requirements for newly
12 developed senior housing and existing
13 senior housing.

14 I think it's important to
15 recognize, at least as I and my colleagues
16 read these parking requirements, that
17 nothing prohibits you from building
18 parking if you're doing market-rate senior
19 housing and people can afford and want
20 down cars. So I think it's important that
21 this is not saying you can never have
22 parking, but if you can afford it, you can
23 do it.

24 So when taken in their entirety,
25 these individual changes reduce barriers

Proceedings

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2 and add incentives that we very much need.
3 They also do a lot to permit us to
4 experiment with new models of housing as
5 they're done in Europe and Scandinavia.
6 We've had a very lock-step approach to
7 senior housing; X number of square feet in
8 X kind of building and only Y amount of
9 community space. These don't allow for
10 any innovation, and as we see people
11 living longer, having more interest, and
12 really wanting to live well -- people are
13 not sick in their 70s, 80s, and 90s, and
14 they have an opportunity to live well --
15 it's very important to offer them
16 opportunities for innovative housing
17 designs and I think this will go some
18 distance in doing that.

19 And also I think this -- we see,
20 and Howard Slackard of your department has
21 pointed out, the in-migration of seniors
22 from other places, which is important.
23 And as people live longer and want to live
24 in a place that is affordable with the
25 amenities that urban environments have,

Proceedings

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2 their children who live here also want to
3 see them live here. So I think these
4 senior provisions are not only important
5 for the seniors, but they're important for
6 the families, and make New York City more
7 livable on both fronts.

8 So thank you very much for
9 today's time.

10 THE CHAIRPERSON: Thank you. I
11 just have one question.

12 MS. HAAGA-ALTMAN: Sure.

13 THE CHAIRPERSON: I mean, you
14 were one of the true pioneers in providing
15 parking -- transportation.

16 (Laughter.)

17 THE CHAIRPERSON: Not parking.
18 Pardon me, it's late in the day.
19 Providing transportation for the elderly.
20 I mean, you really have come up with among
21 the most innovative programs in the
22 country for providing transportation for
23 the elderly.

24 And do you think that the
25 elderly that qualify for affordable

Proceedings

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2 housing have other transportation options
3 available to them and how do they take
4 advantage of those?

5 MS. HAAGA-ALTMAN: Well, I think
6 what you're referring to, Mr. Chairman, is
7 pioneering a para-transit service in the
8 Lower East Side in the 70s, which then,
9 after banding together with Veterans,
10 paralyzed groups, and other groups that
11 wanted the accessibility to the subways
12 and buses, we banded together for
13 accessible transportation on multiple
14 fronts and created Access-a-Ride.

15 I think that clearly many of the
16 populations in senior housing have access
17 to Access-a-Ride, and that's not an
18 income-based program as you know, so that
19 covers the range. I think there are many
20 things that many people think could be
21 done to improve that, perhaps meshing
22 funding sources so that you have a more
23 efficient system, but that's another
24 topic.

25 But yes, I think Access-A-Ride

Proceedings

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2 is one option, certainly the Mayor's
3 efforts to make taxis more accessible, and
4 various programs like that. So I think
5 there are a number of transit options.
6 And as we try to have -- and I understand
7 the issues in the outer boroughs
8 completely, where they're not transit
9 zones, but as we try to get people of all
10 ages and all stripes to use public
11 transportation more, then I think we're
12 talking about -- and to have a greener
13 city, then we're talking about trying to
14 have less reliance on cars. And I know
15 that's un-American, but I think that's the
16 goal for all of us, no matter what age.
17 And -- but we do recognize that in the
18 outer boroughs if you're not near a subway
19 or bus line, that's tricky.

20 And so I think the innovations
21 in the taxi industry, as well as maybe
22 some improvements down the road in
23 Access-A-Ride will make transportation
24 much more available, so that reliance on
25 cars can go down.

1 Proceedings

2 THE CHAIRPERSON: Thank you.

3 Any questions for Ms. Altman?

4 (No response.)

5 THE CHAIRPERSON: Thank you very
6 much.

7 Christine Berthei. Is she here?

8 (No response.)

9 THE CHAIRPERSON: I don't think
10 so.

11 Okay. Switching now to those in
12 opposition. The next five speakers:
13 George Sotiroff, Sharon Haye, Rosemary
14 Ginty, Sigilfredo Roman and Dr. Jim
15 Fairbanks.

16 Any of those here?

17 (No response.)

18 THE CHAIRPERSON: Hearing none,
19 then going back to those in favor.

20 Next five speakers are Benjamin
21 Dulchin, Julia Kite, I think, Dawanna
22 Williams already spoke, Andrea Kretchmer,
23 and those are the next speakers.

24 Any of those here?

25 MS. GOLDSTEIN: I'm here for

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Benjamin Dulchin.

THE CHAIRPERSON: Sorry?

MS. GOLDSTEIN: I'm here for Benjamin Dulchin.

THE CHAIRPERSON: Okay.

MS. GOLDSTEIN: Benjamin apparently had to feed his children, but I'll read his testimony.

(Laughter.)

MS. GOLDSTEIN: My name is Emily Goldstein.

THE CHAIRPERSON: He could have fed us.

MS. GOLDSTEIN: That's what I just texted him.

THE CHAIRPERSON: I don't know why he wanted to feed his children. I mean, what about the Commissioners here?

MS. GOLDSTEIN: Apparently pasta so...

THE CHAIRPERSON: Okay.

(Laughter.)

MS. GOLDSTEIN: So thank you all for a long day. My name is Emily

Proceedings

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2 Goldstein. I'm the Senior Campaign
3 Organizer at ANAHD, the Association For
4 Neighborhood and Housing Development, and
5 I won't introduce our organization again
6 since my co-worker just spoke on MIH.

7 I'm here to speak for our
8 position on Zoning For Quality and
9 Affordability, ZQA. So while we do have
10 some suggestions for improvement for the
11 ZQA proposal, and we acknowledge that the
12 proposed text does mean some real
13 trade-offs for communities, we believe the
14 ZQA proposal is worthy of support. The
15 ZQA proposal reports thoughtful and modest
16 changes to encourage affordable and senior
17 developments, while preserving the types
18 of livable mixed-use communities New
19 Yorkers value. We all agree that we
20 should plan for our future needs, and it
21 is clear that housing will continue to be
22 one of the City's most pressing issues.

23 We currently have a million
24 senior citizens who are disproportionately
25 low income. Just this November the

Proceedings

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2 Citizens Budget Commission came out with a
3 study which showed that almost a third of
4 single seniors pay more than half of their
5 income in rent. The Zoning for Quality
6 and Affordability proposal takes some
7 smart steps to address this need.

8 It's important to be honest
9 about the trade-offs. These changes do
10 mean height increases for new buildings in
11 many areas, and since contextual districts
12 are almost always the result of community
13 advocacy, we are concerned about the
14 precedent it sets and believe revisiting
15 the regulations in these districts is
16 something that should not be taken
17 lightly. But we also believe that modest
18 height increases offered by ZQA in return
19 for incentivizing affordable and senior
20 housing are reasonably designed.

21 The new ZQA rules are
22 specifically written not to encourage
23 teardowns of existing structures to make
24 way for new developments, only to
25 encourage better design and affordability

Proceedings

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2 for those new developments.

3 Planning New York City is the
4 art of balancing many concerns in a city
5 with very limited space. With our
6 affordable housing crisis continuing
7 unabated and our senior population
8 projected to increase 36 percent by 2030,
9 the ZQA proposal strikes the balance our
10 city will need in the coming decades.
11 Most importantly, this proposal fits with
12 our belief that zoning changes should in
13 all cases specifically encourage
14 affordable housing development or other
15 community benefits.

16 Communities of all kinds from
17 across the City have made it clear that
18 more luxury housing is not a community
19 benefit, and we're heartened that the City
20 has recognized this and modified it's
21 original ZQA proposal to better encourage
22 inclusionary housing, affordable housing,
23 and senior housing instead of unrestricted
24 market housing.

25 There are certainly aspects of

Proceedings

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2 ZQA which we think could be strengthened.
3 For instance, we believe all housing
4 throughout the entire development under
5 the new rules should be permanently
6 affordable. With our senior population
7 looking to peak in 30 years, it makes no
8 sense to allow affordable senior
9 developments under the new rules whose
10 regulatory agreements will expire in
11 30 years when the crisis is at it's peak.

12 Another aspect that should be
13 considered is that ZQA should be more than
14 a one-size-fits-all solution. Not all
15 local neighborhood parking needs, mass
16 transit access or commercial space needs
17 are the same. Current density and
18 supportive housing providers vary, and ZQA
19 should take these types of difference into
20 account. There are a variety of valid
21 concerns that have been raised throughout
22 this land-use process, and we hope the
23 Administration's final ZQA policy will
24 factor in that community feedback.

25 The City must also put in place

Proceedings

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2 the other pieces of this larger question
3 of addressing our affordability crisis.
4 We need better support for community-based
5 non-profit developers, a much stronger
6 Mandatory Inclusionary Housing proposal
7 that creates deeper affordability units,
8 and a citywide plan to prevent
9 displacement and harassment of existing
10 tenants in affordable housing units. More
11 senior and affordable housing is something
12 our city needs, our seniors and low-income
13 families need, and we are ultimately
14 better off addressing this issue now
15 before our affordable senior housing
16 crisis gets worse.

17 The Administration should be
18 commended for its foresight and
19 proactivity on this issue, and we support
20 the effort.

21 Thank you again for the
22 opportunity.

23 THE CHAIRPERSON: Thank you very
24 much.

25 Questions?

1 Proceedings

2 (No response.)

3 THE CHAIRPERSON: Thank you.

4 Julia Kite, Andrea Kretchmer.

5 Julia Kite?

6 MS. KRETCHMER: I'm Andrea.

7 THE CHAIRPERSON: You're Andrea?

8 MS. KRETCHMER: Yes. I got to
9 commend you, Chairman, your team's
10 attention span is remarkable. I don't
11 know if you took away their phones or
12 they're just so well behaved 'cause it's
13 amazing. They're -- it's amazing. I'm
14 very impressed.

15 THE CHAIRPERSON: We just didn't
16 give them the code for the Wi-Fi system.

17 (Laughter.)

18 MS. KRETCHMER: That'll do it.
19 Okay, good. No, it's really impressive.

20 THE CHAIRPERSON: Couldn't trust
21 them if we gave them that. Anyway, go
22 ahead.

23 MS. KRETCHMER: So thank you for
24 inviting me to testify. My names is
25 andrea Kretchmer. I'm a Principal at the

Proceedings

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2 Kretchmer Companies, a woman-owned
3 business enterprise, and also a Managing
4 director at PoCo Partners; both of those
5 are New York-based firms that specialize
6 in community, mixed development, in and
7 around New York City, developing
8 affordable and mixed-income housing.
9 Collectively PoCo and Kretchmer have
10 developed 2 million square feet of
11 affordable residential real estate with
12 community facilities and commercial uses.

13 We're proud of the role we've
14 played in helping revitalize communities
15 including Harlem; Jamaica, Queens; Melrose
16 in the Bronx; Brownsville, East New York,
17 and Coney Island in Brooklyn, and we're
18 committed to helping address the current
19 housing crisis facing low- and
20 middle-income New Yorkers.

21 We support ZQA. We think it's
22 going to play -- we can play -- ZQA will
23 play a vital role in helping us help the
24 Administration reach it's affordable
25 housing goals. Primarily, of course, it's

Proceedings

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2 creating residential developments that are
3 more in line with the existing
4 neighborhoods. Current contextual zoning,
5 was established in 1987 and desperately
6 needs to be updated. Bay windows, the
7 elimination of ground-floor units and the
8 alignment of new and old streetwalls are
9 small details, they're important and will
10 substantially enhance buildings in these
11 neighborhood. All of those are possible
12 under ZQA.

13 We've also heard a lot tonight
14 about modernizing building envelope rules,
15 and while those changes just do call for
16 modestly increased heights, they limit the
17 number of stories increasing the
18 floor-to-floor ratio. I won't belabor
19 that point.

20 What I'd like to focus on,
21 unfortunately, is the negative impact of
22 the parking requirements. So we,
23 obviously, find them to be onerous. So
24 let me give you two practical examples.
25 Right now, Kretchmer Companies is in

Proceedings

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2 construction in East New York on a project
3 called Stanley Commons. We have 240
4 apartments in six low-rise buildings and a
5 20,000 square foot community facility,
6 that's a full city block. On that same
7 lot, there's a new 80-unit senior building
8 that was recently completed. That block
9 was the site of a grievously underutilized
10 NYCHA parking lot. So there were hundreds
11 and hundreds of spaces there where dozens
12 of cars were using them. So that was an
13 RFP and we're proud of that. We're going
14 to include parking in the new development,
15 we are including parking, but that most of
16 that space is going to house seniors and
17 families.

18 In Mott Haven in the Bronx, PoCo
19 is working with a non-profit that owns
20 their underdeveloped building right now,
21 debt free. The Grand Concourse is nearby.
22 There's a fistful of bus lines, and of
23 course the 2, 4, and 5 trains are at the
24 intersection of 149th Street and Grand
25 Concourse. The train is so close to this

Proceedings

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2 development site that it sits on top of an
3 MTA subway tunnel. The ideal development
4 scenario, which City Planning gifted to
5 that neighborhood in 2009 with the Lower
6 Concourse Rezoning, is the equivalent to
7 an R8. So the ideal scenario on that site
8 is 30,000 square feet of community
9 facility and 60,000 square feet of
10 residential. There's simply no place to
11 put the 27 currently required parking
12 spaces. You can't dig down because of the
13 tunnel, and if you stack them up the
14 community facility is lost or shrunk to
15 the point uselessness. Alternatively,
16 with fewer residential units, our
17 non-profit partners can't support debt,
18 they can't operate the building, sustain
19 their programs, or continue to improve the
20 quality of life for children and teens in
21 the Bronx.

22 We can provide more quality
23 affordable housing for families and
24 seniors but only if costly unneeded
25 parking requirements are eliminated.

Proceedings

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2 ZQA helps us further our mission
3 of revitalizing communities and maximizing
4 positive impacts, and we look forward to
5 continuing to do our part.

6 THE CHAIRPERSON: Thank you very
7 much.

8 MS. KRETCHMER: Thanks.

9 THE CHAIRPERSON: Questions.
10 Questions?

11 (No response.)

12 THE CHAIRPERSON: Thank you very
13 much, Ms. Kretchmer.

14 Okay, now switching again to
15 those in opposition, the next five
16 speakers are, I think, it's Dian or Dilan
17 Hawkins, Enrique Colon, Steve Chesler,
18 Scott Fraser and Kim Fraser.

19 Any of those here?

20 Who is the first of this group?

21 MR. CHESLER: Steve.

22 THE CHAIRPERSON: Steve Chesler?

23 MR. CHESLER: Steve Chesler,
24 yes.

25 THE CHAIRPERSON: Dian Hawkins

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is not here?

(No response.)

THE CHAIRPERSON: And Enrique
Colon is not here?

(No response.)

THE CHAIRPERSON: Okay,
Mr. Chesler.

MR. CHESLER: Thank you and good
evening and, yes, I commend you for, you
know, extending the process so everyone
can be heard. I really appreciate that.

THE CHAIRPERSON: Everyone has a
right to be heard.

MR. CHESLER: So I'm hear with a
couple of my colleagues representing
Greenpoint/Williamsburg neighborhoods in
Brooklyn, as we were the victims of
similar a type of rezoning in 2005. And
out of that, you know, they -- you know,
they basically instigated, you know,
intense land conversion from commercial to
residential, and so we've had just a
population and density boom. And all of
us have -- know, you know, people

Proceedings

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2 personally who have been displaced from
3 the neighborhood and businesses that were
4 there for years and years.

5 And one of the things promised
6 out of the rezoning was open space to help
7 mitigate the massive influx of people and
8 buildings. And here we are, fast-forward
9 10 years later, and we still don't have
10 the open space, but we have the buildings
11 and the masses of people, and it actually
12 hasn't even peaked yet; it's still coming.
13 So we're, you know, we're heartbroken.
14 It's 10 years going on and we're still
15 kind of bleeding.

16 And so having this new proposal
17 put forth in the City, we're just -- we
18 can't just stand by and let a potentially
19 similar situation happen to the
20 communities across the City. So we've
21 been going to other community boards in
22 East New York and Brownsville, Crown
23 Heights, and the south shore of Brooklyn
24 basically speaking out about this issue
25 because it's really -- it's a question of

Proceedings

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2 public trust and broken promises and just,
3 you know, witnessing similar initiatives
4 and the potential for increasing
5 affordable housing in our neighborhood,
6 and it just didn't happen.

7 If you're a developer or luxury
8 property owner, you're doing extremely
9 well. And so we're seeing a very similar
10 horizon with this new proposal. I mean, I
11 know something has to be done; I
12 appreciate that the City is trying to do
13 something with these two initiatives, but
14 we just see, you know, in very general
15 terms the potential destruction, that
16 people are going to get displaced, and I
17 just feel like something more drastic and
18 radical really should be more in store so
19 other neighborhoods don't get their heart
20 broken and are fighting for open space and
21 infrastructure and affordable housing
22 10 years down the line.

23 So thank you very much.

24 THE CHAIRPERSON: Thank you very
25 much. I just want to note, Mr. Chesler,

Proceedings

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2 that as part of the Mayor's affordable
3 housing program in areas that the City is
4 looking at for significant rezonings, the
5 budget has set aside a billion dollars,
6 you may have heard reference to that if
7 you were here earlier, to pay for and
8 guarantee the infrastructure that's
9 promised in those neighborhoods
10 immediately.

11 So, you know, recognizing the
12 issues of the past, I think, just so
13 you're aware that while not a part of
14 these two proposals, it's nevertheless a
15 major component of the City's overall
16 housing plan.

17 MR. CHESLER: Well, that's
18 encouraging. Thank you.

19 THE CHAIRPERSON: Any questions
20 for Mr. Chesler?

21 (No response.)

22 THE CHAIRPERSON: Scott Fraser.

23 MR. FRASER: Good evening,
24 Mr. Weisbrod. We just heard you on Brian
25 Lehrer's show on the radio.

Proceedings

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THE CHAIRPERSON: My colleague, Ms. Vena, over there has been very patient.

MR. FRASER: So I apologize for what I'm about to say, which is going to be against this plan, in advance. We're very incensed in our neighborhood, and we're committed to the City, we're -- my name is Scott Fraser, I'm with Friends of Bushwick Inlet Park. I've fought for the community and our neighborhood for several decades. And this is something that comes to the heart of what we love about New York. Here we are at five to eight o'clock -- five to eight at night, and I feel like everything else about this ill-conceived and hand-fisted rush job, we're here late, you're here late. People in the neighborhoods don't understand this plan. We've been out and about, Steve has said, we've gone out to meetings, we've spent our time going on the road to listen to your presentations, and I'm here to tell you that communities don't understand

Proceedings

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2 this.

3 It's a very dense
4 recommendation. It has a lot of
5 implications, economic -- you'd almost
6 need a Master's in City Planning and
7 economics to understand the FARs and the
8 AMIs and all of the ins and outs of this
9 plan. Communities don't get it in one
10 night. It's rushed. It feels
11 heavy-handed and insensitive.

12 We feel the City Council should
13 vote no to de Blasio Administration's
14 misguided efforts to rezone our city in
15 the name of affordable housing. That
16 sounds very honorable, and we support
17 that, but we don't feel this is the way to
18 get there.

19 Giving away what's sacred to us,
20 our public assets to developers is for us,
21 from our perspective, like asking the fox
22 to guard the hen house; that's the way we
23 feel about this.

24 All you need to do is follow the
25 money, we feel, in what is basically a

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2 give-away to developers at the expense of
3 everyday citizens, like us, who are
4 starving for a liveable city. We've been
5 at City Planning meetings around the City,
6 as I've mentioned, community board
7 presentations, and we're warning
8 residents. Beware, because we are the
9 neighborhood of failed promises. We are
10 in the northwest corner in Brooklyn, we
11 have a storied industrial past, that we're
12 very proud of, that has left us in
13 pollution. And our own rezoning, we feel,
14 is a cautionary tale to everyone about
15 this plan.

16 We have experienced the largest
17 rezoning in New York City history, and
18 correct me if I'm wrong, 185 blocks of our
19 cherished East River waterfront, and we
20 can't even get the City to come through on
21 it's promise for a 28-acre park on our
22 waterfront. We can't get it. It sounded
23 great in 2005 when Mayor Bloomberg said
24 it, but here we are waiting 10 years later
25 we have barb-wired fences, polluted

Proceedings

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2 property, and no park, and yet that was
3 promised.

4 Again we love this City, we love
5 New York. We have one of the world's
6 largest oil spills in our neighborhood.
7 We have one of the world's largest sewer
8 treatment plants. We bear the burden for
9 the City. We have one of the only storage
10 places for radioactive waste. So when we
11 got the rezoning for mitigation, we were
12 promised things, the same way you're
13 promising with MIH and Zoning for Quality
14 and Affordability. Yet, we see no
15 remediation. We're one of New York City's
16 most starved open-space communities.

17 So when you promise us open
18 space in return for rezoning and we don't
19 get that, we're bitter. After rezoning we
20 have 7.5 more acres to complete our park,
21 which is still not done, and yet the
22 City's telling us there's no money for
23 that, to complete the park. Now the only
24 way to complete the park is to sell off
25 the heart of our park to a developer --

Proceedings

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2 does that sound familiar? -- with, of
3 course, affordability incentives built in,
4 allowing the building to go higher, the
5 FAR to increase, tax incentives for
6 developer in the middle of what was
7 promised to be our park.

8 So we're skeptical about this
9 whole proposal, with all due respect,
10 again, there's a very impressive array of
11 people here and we're humbled to be able
12 to speak to so many people at once in
13 positions of power. We're facing -- I'm
14 going to wrap up -- just high-rise towers
15 separating us from our waterfront because
16 of the new construction.

17 We feel that New York City has
18 no real skin in this game. We're saying
19 beware, East New York; beware, South
20 Bronx; beware, East Harlem; beware, Staten
21 Island.

22 THE CHAIRPERSON: Okay, thank
23 you.

24 Questions for Mr. Fraser?

25 MR. FRASER: I'm happy to answer

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questions.

THE CHAIRPERSON: Is there a question?

No questions.

(No response.)

THE CHAIRPERSON: Thank you.

Kim Fraser.

MS. FRASER: Hi, I'm married to Scott, and we have been fighting for our neighborhood since we moved there in 1980. Our son is grown up; he's a married man. He never got to go to the edge, he never got to go catch a breeze on the waterfront.

I come from Polish ancestry; my grandmother worked in Domino Sugar Plant, my uncle was a longshoreman on the waterfront, and we came in 1980 to live in Greenpoint and did not know how polluted it was and how dangerous it was for our health. But we stayed and we stayed and here we are, we're still there.

And I'm sitting here all -- not all evening, just since I came back from

Proceedings

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2 Greenpoint to come to this meeting. I was
3 here at nine o'clock in the morning, I
4 figured out what was going on and --

5 (Laughter.)

6 MS. FRASER: -- and went home
7 and came back.

8 THE CHAIRPERSON: You timed it
9 well.

10 MS. FRASER: And I keep seeing
11 that title up there, City Planning
12 Commission, and I keep thinking about all
13 the groups I've talked in front of, and
14 the reporters I've spoken with, and the
15 community board women that -- from East
16 New York, from Brownsville, that after I
17 speak they end up coming and giving me a
18 hug, and I don't even really know why
19 except that I'm speaking from my heart,
20 and they believe it and they know that
21 what I'm saying is coming from a good
22 place.

23 And I -- when I see what's going
24 on in the Greenpoint/Williamsburg
25 waterfront, the density, the height, the

Proceedings

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2 buildings that are being allowed to be
3 built on floodplain. Since Sandy, the red
4 line where these towers are going up, if
5 you go look on the map that the City put
6 out and it said, hey, people, if the
7 hurricane's coming, and we tell you it's
8 coming, and you're on a red line, call
9 your friend who lives in the green and get
10 to their houses, all the towers are on the
11 red line. So I just really don't have any
12 faith, like Scott said, that we can trust
13 anything that New York City says to us.

14 I remember watching, I guess it
15 was Deputy Mayor Doctoroff say, we're
16 reclaiming the waterfront, people. We're
17 going to really start using our
18 waterfront. And I'm just here to say
19 thanks for all the reclaiming, we got
20 nothing. We have a curtain of towers that
21 look like Miami Beach. There is no place
22 for the kids to go, no place for the old
23 people to go. We're still in the same
24 bogged down situation we were when it was
25 all industry and it was all polluted. It

Proceedings

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2 is not our waterfront, it's somebody
3 else's waterfront that's coming, some
4 other middle-class people that are coming.
5 It's not the people that have lived there
6 for generations.

7 If they're lucky enough to own
8 their building, they're still there until
9 a developer knocks on their door and
10 offers them millions of dollars to just
11 get out. And then they leave and then the
12 affordable units that were there are no
13 longer affordable. So this is like a
14 steamroller that comes to your
15 neighborhood and it takes up steam, and no
16 amount of zoning and 25 percent this or
17 30 percent that saves the individual
18 homeowner from just going, Well, I'll go
19 back to Poland, I'll go to Florida, I'll
20 go to Arizona -- you mean, you know, I've
21 only ever been a blue-collar worker and
22 now you're telling me the land underneath
23 my four-story building is worth \$2 million
24 and you'll give it to me? I'll take it.

25 So there's nothing in there for

Proceedings

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2 the existing affordable housing -- that's
3 what everyone laughs about, you know the
4 Mayor of -- the Tale of Two Cities Mayor;
5 no one ever felt under such pressure about
6 not being able to stay in their own
7 neighborhood until now, until he came to
8 town with this story. And now they're
9 like, we gotta leave, we gotta go, I guess
10 I'm going to Pennsylvania.

11 I mean, you can't even go to
12 East New York anymore because they're
13 coming after you there.

14 And so I'm just a person on the
15 ground who tried to be an active citizen,
16 who tried to do the right thing, and I
17 really feel like I lost.

18 THE CHAIRPERSON: Well, I hope
19 you end up not feeling that way. But, as
20 I said to Mr. Chesler, we are trying to
21 learn from the lessons of the past, and
22 that's why when we look at neighborhoods
23 going forward, we are and have set aside a
24 big chunk of money, it's never been done
25 before, just to support and pay for

Proceedings

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2 infrastructure, open space, transportation
3 infrastructure, schools and the like, that
4 communities will have the public
5 developments that they need to have to
6 accompany in density.

7 But I understand what you're
8 saying and I think that you have to just
9 wait and see if we fulfill that promise.

10 MS. FRASER: Okay, thanks.

11 COMMR. DOUEK: I want to ask one
12 question.

13 As I sit here through today, I
14 just want to understand, where did we lose
15 in the messaging, because the MIH proposal
16 is going to require any neighborhood
17 rezoning, which will still have to come
18 through the ULURP process, but it's going
19 to make a requirement that there's a
20 certain amount of affordable housing built
21 into that as opposed to not having that
22 requirement prior to the MIH if it passes.

23 So where did we lose in the
24 messaging, because I'm hearing from the
25 opposition that they're just -- I don't

Proceedings

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2 know if they understand the concept, that
3 we're not rezoning their neighborhood
4 right now. We're just ensuring that if
5 their neighborhood gets rezoned, there's a
6 certain amount of Mandatory Inclusionary
7 Housing that must be provided in the
8 rezoning, a minimum of.

9 MS. FRASER: Well, because when
10 people look at your charts with the little
11 people, like, okay, there's one person in
12 this space and they have to make this much
13 and now there's two people and now down
14 the line, they all realize -- we're
15 already doubling up in our family. We're
16 living four to six people and we make
17 \$23,000. Four to six people do not -- if
18 you go across the line, it's not \$23,000,
19 so they go, Phh, that's not for me. And a
20 lot of my neighbors and my family we're
21 all down, down, down here.

22 Like Greenpoint, when I got
23 there in 1980, people who cleaned subways
24 lived in Greenpoint. I mean, really, we
25 need them, we need these people, but they

Proceedings

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2 don't make a lot of money or they work
3 three jobs to try to survive, and this was
4 back in 1980. They are gone; they do not
5 live in Greenpoint anymore .

6 COMMR. DOUEK: So what you're
7 saying is the levels of affordability are
8 your concern?

9 MS. FRASER: Yeah. And we don't
10 believe, this idea that it's a lottery.
11 We have one building came on line, I think
12 it had 150 affordable units, 60,000
13 Greenpointers applied for it; that is like
14 winning the New York State Lottery. That
15 to them is like such a joke, and one woman
16 who worked in a -- she's a clerk in a
17 pharmacy, she's Polish, she talks to me
18 because she thinks maybe I don't really
19 get this program because of my language
20 barrier so I'll ask Kim. And she said, my
21 salary is \$42,000, I've applied -- I work
22 full-time, I've applied to 15 different
23 affordable housing buildings, not in
24 Greenpoint, 'cause there's not 15 in
25 Greenpoint, and I'm rejected. She goes,

Proceedings

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2 I'm saving all my rejection letters, and
3 she still doesn't understand because they
4 tell her in her rejection letter, you make
5 too little, you need to make \$55,000 to
6 get into an affordable housing unit. I
7 don't really know enough about -- I tell
8 her, no, you've got it right, that's the
9 situation.

10 So that one building that got
11 the 60,000 applications was like -- right
12 away you're message went like, Whoa, I
13 guess they don't really mean it. They
14 mean it like a dressing, like a little --
15 it's a little bit of fate, like we're
16 going to put in all this market rent and
17 then we'll tell you we're giving
18 25 percent affordable, but it's not really
19 what this neighborhood, as it was then,
20 needs. And it's still -- there's still a
21 lot of poor people in Greenpoint and
22 Williamsburg.

23 I think 72 percent of the kids
24 in our community that go to public school
25 get free lunch, and you don't get free

Proceedings

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2 lunch unless you've filled out all the
3 forms, you know, the parents fill them
4 out, they hand them in, and they prove to
5 the school that they're that poor.

6 So right now de Blasio has even
7 actually told Greenpoint, you can tell
8 them to forget it. That hipster place is
9 so not in need of anything, that we're not
10 coming there, we got a lot more problems
11 in other neighborhoods, and I just feel
12 like, you know, that's incredibly
13 insulting.

14 THE CHAIRPERSON: Thank you, Ms.
15 Fraser.

16 Okay, going now to those once
17 again in favor. The next five speakers
18 are Alan Baker Yu, Claire Hilger, Evelyn
19 Wolff, Andrea Gianfrani, and Jonathan
20 Bowels I know is not here.

21 MR. YU: Good evening,
22 Commissioners. Thank you for your time.
23 My name is Alan Yu and I'm testifying on
24 behalf of Southside United HDFC Los Sures
25 in favor of the proposed Zoning for

Proceedings

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2 Quality and Affordability text amendment.

3 Los Sures is a 43-year-old
4 multiservice non-profit organization
5 deeply rooted in the community of North
6 Brooklyn, and we're also a member of
7 ANAHD, the Association For Neighborhood
8 and Housing Development. Through our
9 diverse activities, which include the
10 provision of social services, tenant
11 organizing, and affordable housing, our
12 extensive engagement in the neighborhood
13 makes us attuned to the needs of local
14 residents.

15 As such, we would like to take
16 this opportunity to highlight one of our
17 development projects that illustrates
18 broader implications of the ZQA amendments
19 favorability.

20 In 2007 we developed a 66-unit
21 building for senior citizens at 145 South
22 Third Street in Williamsburg. Based on
23 the existing Zoning regulations, we had to
24 provide off-street parking in the form of
25 a parking lot behind the building with

Proceedings

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2 designated spaces for 11 cars. In the
3 eight years since the building was
4 constructed, we've only had one tenant out
5 of 66 who has a car and uses the parking
6 lot. The majority of the time the parking
7 lot remains empty. In consulting with the
8 original architect, had the parking
9 requirement been waived, as it could have
10 been under the ZQA amendment, an
11 additional 12 units of senior housing
12 could have been built.

13 Thus, given the City's
14 increasing need for affordable and senior
15 housing, it makes sense to make on-site
16 parking optional for projects built in
17 transit-accessible areas.

18 Beyond 145 South Third Street we
19 have numerous other projects of varying
20 affordability levels and different
21 supportive programs catering to diverse
22 populations. In all examples where
23 on-site parking is provided, it is either
24 underutilized or improperly used by
25 adjacent neighbors and commercial

Proceedings

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2 visitors.

3 We also have new construction
4 projects in the predevelopment stage,
5 where the current Zoning imposes parking
6 requirement that either adds significant
7 cost to construction and/or reduces the
8 total number of units that we can build.
9 Many of these instances also highlight the
10 unnecessary complexities born upon us,
11 where we are unable to take advantage of
12 maximum buildable FAR allowed by Zoning to
13 build more affordable units because it
14 does not fit within the building envelope,
15 or we're unable to utilize more
16 cost-effective innovative building
17 technologies, like modern construction or
18 blocking complaint construction, which
19 would allow us to leverage like government
20 funds to build more units because of
21 restrictive dimensions currently imposed.

22 Overall we believe that the ZQA
23 text amendment is a positive change that
24 updates the existing Zoning to reflect
25 modern trends in people's lifestyles and

Proceedings

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2 new building technologies. The proposed
3 amendment would enable developers such as
4 ourselves -- affordable housing developers
5 such as ourselves -- to help further New
6 York City's long-term objectives of
7 delivering 200,000 units of affordable
8 housing over the next ten years, while
9 promoting healthier active lifestyles and
10 increasingly transit-accessible areas.

11 THE CHAIRPERSON: Thank you,
12 Mr. Yu.

13 Questions?

14 (No response.)

15 THE CHAIRPERSON: Thank you very
16 much.

17 Claire Hilger. Is it Hilger or
18 Milger?

19 MS. HILGER: Hilger. Hi, my
20 name is Claire Hilger, and I'm the Senior
21 Vice President for Real Estate for
22 Catholic Charities of Brooklyn and Queens,
23 and the Director of our Housing
24 Development on our Catholic Charities
25 Progress for People's Development. Thank

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you so much for staying so late tonight.

THE CHAIRPERSON: Thank you.

MS. HILGER: I went home.

(Laughter.)

THE CHAIRPERSON: Now you tell us.

MS. HILGER: We're in Brooklyn Heights. Catholic Charities has been working in Brooklyn and Queens since 1899. We have over 160 programs, with early childhood education, to senior center, and everything in between.

For our senior programs, we focus on providing seniors in Brooklyn and Queens with a way to stay in Brooklyn and Queens. We have 17 senior centers, we help them get on SCRIE so they can stay in their home, we provide home-delivered meals to the homebound elderly, and other services that make New York City a liveable community.

For our residents that cannot stay in their apartment, we have over 23 apartments for seniors in 25 building

Proceedings

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2 throughout Brooklyn and Queens. We
3 receive calls every day from seniors,
4 pastors, family members, elected
5 officials, and friends who have a senior
6 that desperately needs a place to stay.
7 The population is aging and the high
8 demand for senior housing is just
9 increasing.

10 This generation of seniors is
11 different from the last, they have smaller
12 family sizes. Our staff tells us that
13 their parties are huge successes for
14 Thanksgiving and Labor Day, and I don't
15 think Catholic Charities is suddenly
16 throwing fantastic parties. Our tenants
17 and the residents, our seniors, have fewer
18 siblings and fewer children to support
19 them and are more isolated; that's why
20 this housing type is so critical.

21 We have over 16,000 seniors on
22 wait lists for our buildings. In
23 addition, we have 1,400 people on a wait
24 list asking for information on how to
25 apply for the wait list, should the wait

Proceedings

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2 list at one of our buildings open up.

3 This is a wait list for the wait list.

4 One of the most popular
5 amenities we provide is tenant gardens.
6 Garden spaces are awarded by lottery and
7 we have wait lists for gardens as well.
8 We do not have a single wait list for
9 parking.

10 I'm here to voice our support
11 for the ZQA amendment. It provides us
12 with a better opportunity to better serve
13 the seniors who live in our housing. The
14 average income of our tenants is about
15 \$12,000 a year, very few of them can
16 afford cars. Some of the parking lots we
17 have are large enough to accommodate new
18 buildings and provide new units for
19 seniors, others are smaller. I would love
20 to take an unused space and put in a bench
21 or plant a tree; I can't go through a full
22 ULURP to do that. So it's just not
23 feasible.

24 According to Pope Francis, "we
25 are all a little fragile of the elderly.

Proceedings

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2 Some however are particularly weak. Many
3 are alone and affected by illness. Some
4 depend on the indispensable care and
5 attention of others. Will we take a step
6 back for this? Will we abandon them to
7 their fate? Where there is no honor to
8 the elderly, there is no future to the
9 young."

10 The City's proposed ZQA
11 amendment honors the elderly by
12 encouraging the production of affordable
13 senior housing. I appreciate the
14 opportunity to speak and urge you to vote
15 in favor of the amendment.

16 THE CHAIRPERSON: Thank you very
17 much.

18 Questions?

19 (No response.)

20 THE CHAIRPERSON: Thank you.
21 Thanks for staying, or coming back.

22 (Laughter.)

23 THE CHAIRPERSON: Evelyn Wolff.

24 MS. WOLFF: Good evening, I'm
25 Evelyn Wolff. I'm Vice President for Real

Proceedings

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2 Estate Development for Self-Help Community
3 Services. As I've been sitting here I've
4 been tempted to pass up the opportunity to
5 speak since several members of Self-Help
6 have spoken to you, some of our tenants
7 and some of our staff, and I'm getting the
8 sense that almost everything that could be
9 said in favor of ZQA has been said, and we
10 support all of that, and I don't want to
11 bore you with a rehash of all the things
12 you've already heard.

13 The one thing I wanted to stress
14 was the cost of parking, and yes, you've
15 heard that as well, but I have two very
16 concrete examples. We are in the process
17 of building new buildings; one in
18 Brooklyn, one in the Bronx -- excuse me --
19 we were very fortunate to get both of
20 those sites at very, very reasonable land
21 costs, which made it feasible for us to
22 build a building for seniors. In both
23 cases we have extreme parking issues. In
24 one case, there's -- it's a rock, we're
25 building on top of rock so we cannot go

Proceedings

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2 down, it's way too expensive to go down.

3 The only thing we can do is stay
4 on street level. Because of the fact that
5 we have to put in X number of parking
6 spaces, we're forced to use triple
7 stackers. This is something that is not
8 conducive to elderly housing. This is
9 something that will cost us a lot of money
10 in terms of having an operator there 24/7
11 even though I can fairly predict that none
12 of the residents, or very few of them, are
13 going to use this parking.

14 In our buildings out in
15 Flushing, where we have 1,400 units --
16 1,400 residents, seven buildings, our
17 parking lots are less than 25 percent
18 used, and Flushing is one of those areas,
19 which isn't -- I mean, Flushing, itself,
20 has good transportation, but it's part of
21 Queens and part of the area that people
22 say, well, there's no transportation,
23 people in Queens need cars. That's my
24 Bronx site.

25 My Brooklyn site is a very

Proceedings

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2 narrow site. It's got 50-foot street lots
3 and deep. No way to put in parking other
4 than, again, at least I don't need triple
5 stackers, I only need double stackers
6 because it's a smaller building. But to
7 layer that kind of expense on to any
8 affordable housing, especially a senior
9 affordable housing, where we know the
10 parking is not going to be used, is in my
11 view pretty ludicrous.

12 So we're fully supportive of
13 ZQA, we're very hopeful that it will pass,
14 even hopeful that it will pass in time for
15 at least my Brooklyn building to become
16 exempt from requirements it now suffers
17 under. And good luck to all of you.

18 (Laughter.)

19 THE CHAIRPERSON: Thank you very
20 much, Ms. Wolff.

21 Questions for Ms. Wolff?

22 Yes, Ms. Levin.

23 COMMR. LEVIN: You occupy a very
24 unique position. First off, thank you so
25 much for putting together a, collectively,

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very impressive presentation to us.

MS. WOLFF: Thank you.

COMMR. LEVIN: You've brought a variety of voices and you put a real face on this issue, and thank you for hanging in and thank your residents for coming as well.

Did you participate in the discussions of the parking requirements in Queens, perhaps at the borough board or with the Queens Borough President? There's such vehemence all across the Queens community about any reduction in required parking, and it just seems to me that your voice --

MS. WOLFF: I did not. I was -- I did attend the Manhattan meeting, I couldn't get to the Queens one.

I believe we did have a representative there and hopefully her or his voice was heard, but I can't attest to that at this point.

COMMR. LEVIN: Thank you.

THE CHAIRPERSON: Thank you very

Proceedings

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much.

Andrea Gianfiani.

(No response.)

THE CHAIRPERSON: No? Okay.

Going back to those in
opposition. Andrea Goldwyn. The next
five, Andrea Goldwyn, Mike Ernst, Rachel
Levy, Susan Simon, Lynne Glosner, I think.

Who is the first of this group?

MS. GOLDWYN: Good evening,
Chairman Weisbrod and Commissioners. I'm
Andrea Goldwyn, speaking on behalf the New
York Landmarks Conservancy.

The Conservancy is a private,
independent, not-for-profit organization
founded in 1973. Our mission is to
preserve and protect historic resources
throughout New York. We support the goals
of increase affordability, but we cannot
support ZQA and MIH upzonings of the
entire city, which impose a one-size-fits-
all approach and ignores New York's unique
communities.

Landmarks Preservation

Proceedings

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2 contributes to affordable housing by
3 maintaining units in older building often
4 in low-scale historic and contextual
5 districts. ZQA encourages new
6 construction with no guarantee of
7 increased affordable housing.

8 There needs to be an analysis of
9 expected new market-rate and affordable
10 units verses stabilized and affordable
11 units that will be lost under ZQA.

12 We share concerns of our friends
13 from the affordable housing community,
14 that the enormous amounts of market-rate
15 development, which MIH requires to produce
16 a small number of affordable units, will
17 tip the balance of many neighborhoods far
18 from affordability, and that provisions
19 allowing the BSA to waive even these
20 requirements, will further reduce the
21 number of new affordable units.

22 Regarding historic resources,
23 the ZQA DEIS is clearly flawed. That
24 section finds no impacts since ZQA is not
25 expected to induce development despite the

Proceedings

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2 goal of increased building. ZQA will
3 effect City-designated historic districts,
4 national registered districts, and
5 Districts eligible for national register
6 listing. It will put undo pressure on the
7 Landmarks Commission to improve
8 out-of-scale additions and new
9 construction in historic districts with
10 contextual zoning. This would negate
11 Landmark designation protections and add
12 pressure to slow future designations.

13 The upzoning overturns basic
14 planning principles. This review process
15 is speeding along faster than that of any
16 of the contextual districts ZQA would
17 replace. Communities with contextual
18 zoning labored over years through lengthy
19 hearings, meetings such as these, to
20 ensure that plans tailored to their
21 neighborhoods garnered consensus often
22 through compromises and battles that
23 aren't part of the zoning text.

24 Homeowners thought that they had
25 certainty and predictability regarding

Proceedings

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2 their blocks. ZQA threatens that work and
3 abandons agreements forged with the City.
4 Light and air were valued, rear yards
5 provided open space with grass coverage
6 that alleviated storm water runoff, but
7 now they can be filled in to maximize FAR.
8 ZQA reverses the Sliver Law and erases the
9 distinction between narrow and wide
10 streets. The system of FAR limits has
11 always been a cap, but under ZQA it's an
12 entitlement.

13 As we see it, there's no strong
14 rationale for alterations to quality
15 housing regulations and it's not clear why
16 this vast array of significant changes,
17 that will be realized very differently,
18 are forced together in one proposal.
19 We're concerned that changes to quality
20 housing regulations won't increase the
21 quality as much as just allow for taller
22 buildings.

23 Construction methods do evolve,
24 so it's impractical to alter zoning for
25 decades based on one technique,

Proceedings

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2 block-and-plank, likely to be replaced in
3 coming years, and the focus on higher
4 ground floor heights seems
5 disproportionate to the abundance of
6 factors that contribute to a buildings
7 success.

8 Given the strong push-back from
9 the vast majority of community boards and
10 borough presidents, we've read that the
11 Administration and Council are already
12 talking about changes to these proposal.
13 We think it's time to withdraw, go back to
14 the drawing board, and craft proposals
15 that address the issues we and communities
16 across the City have raised and create a
17 plan that better serves New York's unique
18 neighborhoods.

19 Thank you for the opportunity to
20 express the Conservancy's views.

21 THE CHAIRPERSON: Thank you,
22 Ms. Goldwyn.

23 Questions?

24 Ms. De La Uz and then Ms. Effen.

25 COMMR. DE LA UZ: Hi, thank you

Proceedings

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2 for being here. I appreciate you raising
3 the concerns about contextual districts.
4 Obviously we've heard that.

5 But can you talk a lit but more
6 about how you think ZQA undermines
7 protections in historic districts and
8 landmarked districts, because I'm not sure
9 I understand that.

10 MS. GOLDWYN: It's in areas
11 where they overlap and that we're
12 concerned that when the proposals go to
13 LPC, the Commission will be under more
14 pressure to approve out-of-scale
15 additions.

16 COMMR. DE LA UZ: So it's the
17 overlapping period?

18 THE VICE CHAIRMAN: Questions?

19 MS. GOLDWYN: Yes.

20 COMMR. EFFRON: You alluded
21 to -- and I've read in a few other
22 documents -- that the -- there would be an
23 incentive to create new construction and
24 therefore lose affordable apartments in
25 older buildings.

Proceedings

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2 Do you have any idea of scale of
3 that?

4 MS. GOLDWYN: That's what we're
5 asking for, that's what's not clear. We
6 think, we believe there are large numbers
7 of affordable, stabilized units in these
8 buildings, and since there aren't specific
9 goals outlined in ZQA, it's not clear what
10 would be lost. So we think that's --

11 COMMR. EFFRON: So you don't
12 know how many would be lost.

13 MS. GOLDWYN: No, we think
14 that's an important fact that needs to be
15 brought to the surface before this goes
16 ahead.

17 THE VICE CHAIRMAN: Further
18 questions?

19 (No response.)

20 THE VICE CHAIRMAN: Thank you.

21 MS. GOLDWYN: I'd just like to
22 add when I got here very early this
23 morning, there were many of my colleagues
24 from the preservation and advocacy
25 community who weren't able to stay for the

Proceedings

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2 rest of day. I hope that they did submit
3 their testimony. If not, I hope they will
4 in the future and I hope you all take the
5 time to read it as much as you've taken
6 the time to be here today. Thank you ALL.

7 THE VICE CHAIRMAN: Thank you,
8 we will.

9 Mike Ernst, Municipal Art
10 Society.

11 Mike?

12 (Laughter.)

13 MS. KELLY: I'm not Mike. Mike
14 had to leave. I am Tara Kelly, the
15 Director Preservation and Design at the
16 Municipal Art Society, a 123-year-old
17 organization that fights for intelligent
18 urban design, planning, and preservation.
19 This is an abbreviated statement. A full
20 statement was submitted to the desk.

21 So as you've heard, and you
22 know, housing affordability has reached
23 crisis levels in New York. As such, we
24 applaud the City for attempting to address
25 the affordable housing crisis. Regarding

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2 the two items today, however, we support
3 Mandatory Inclusionary Housing proposal
4 but are unable to support ZQA in it's
5 current form.

6 First on MIH, we think it's an
7 important instrument in leveraging the
8 market to create an appropriate housing
9 mix. The proposal will create housing
10 that meets the need of a broad range of
11 City residents, MIH will create
12 permanently affordable units, and because
13 MIH only applies to neighborhoods that are
14 being rezoned for individual special
15 permit applications, we feel confident in
16 supporting it on principle as any
17 application of MIH will be subject to a
18 full public review.

19 However, we think the proposal
20 could go further. It should be expanded
21 to encourage the production of units for
22 very low-income residents at deeper levels
23 of affordability. Additionally, MIH
24 should do more to incentivize on-site
25 affordable units where high land values

Proceedings

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2 and density allows while working to
3 develop legal structures, funding
4 strategies, and other mechanisms to ensure
5 the long-term maintenance of off-site
6 affordable units.

7 On ZQA, MAS supports some of the
8 proposed changes, including the promotion
9 of affordable and senior housing, reduced
10 parking requirements for affordable
11 housing, and the encouragement of more
12 vibrant streetscapes. However, while
13 these are all important measures, there
14 are still a number of concerns that we
15 feel need to be addressed before we could
16 support it.

17 First, we are concerned that
18 increased height and bulk -- we're
19 concerned about increased height and bulk
20 in contextual districts. Many
21 neighborhoods have changed contextual
22 zonings after years of negotiation with
23 the City and, therefore, should have more
24 involvement in those proposed changes for
25 their specific neighborhoods. MAS

Proceedings

1
2 recommends that the Administration provide
3 a more targeted approach for each
4 neighborhood. We have reservations about
5 the current proposal as it applies to
6 historic districts and think that further
7 study is warranted. While new development
8 in historic districts is subject to review
9 by LPC, the burden of regulating bulk and
10 height should not fall solely upon them.

11 We feel it's difficult to
12 appreciate the benefits of this proposal
13 without clear projections about the number
14 of new units and other changes that would
15 be generated by ZQA. MAS strongly
16 supports the City's proposal to eliminate
17 unnecessary parking requirements for
18 affordable housing, but the proposal
19 should do even more. MAS recommends
20 reducing mandatory parking requirements
21 for all new development.

22 We are concerned that the senior
23 affordable residence generated under this
24 proposal would not be permanently
25 affordable, even if increased height and

Proceedings

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2 bulk is retained for the buildings
3 lifetime.

4 Finally, we think height limits
5 in the proposal should be refined to
6 better account for difference between wide
7 and narrow streets.

8 We feel that elements of the ZQA
9 proposal come across as piecemeal and it
10 continues to be difficult to determine
11 real-world impact on specific
12 neighborhoods. We ask the City to think
13 more boldly about the creation of
14 affordable housing, working towards
15 complete neighborhoods that provide the
16 services and amenities both current and
17 future residents need. Thank you.

18 THE VICE CHAIRMAN: Thank you.

19 Questions?

20 (No response.)

21 THE VICE CHAIRMAN: Thank you
22 very much.

23 Rachel Levy? Rachel Levy?

24 FEMALE SPEAKER: She had to
25 leave.

1 Proceedings

2 THE VICE CHAIRMAN: We certainly
3 understand that.

4 Susan Simon? Susan Simon?

5 (No response.)

6 THE VICE CHAIRMAN: Lynne
7 Glosner. Lynne Glosner.

8 (No response.)

9 THE VICE CHAIRMAN: Okay. We
10 will now switch to those in favor. The
11 next several speakers are starting with
12 Diane Barrett.

13 Diane Barrett? Diane Barrett?

14 (No response.)

15 THE VICE CHAIRMAN: Tiana
16 Leonard? Tiana Leonard?

17 (No response.)

18 THE VICE CHAIRMAN: James
19 Colgate.

20 MR. COLGATE: Right here. Good
21 evening, let me put my glasses on. Okay.
22 Commissioners, thank you for staying so
23 late. My name is James Colgate, Land-Use
24 Counsel of Bryan Cave, LLP, and a member
25 of the American Institute of Architects.

Proceedings

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2 While my current clients include
3 developers and institutions on land-use
4 matters, and while some of these proposals
5 would impact them, significantly perhaps,
6 I'm not coming to you today as a paid
7 representative of any of them. Instead I
8 come to you on my own, representing my
9 strong support of everything that is in
10 the ZQA proposal.

11 As for my background, my
12 post-secondary degrees in urban design,
13 architecture and historic preservation,
14 and the law. I was a member of CB-2
15 Manhattan in the 90s. I have been a City
16 employee most of my career stretching
17 almost 30 years off and on; first, at the
18 Department of City Planning in the late
19 80s and HPD doing affordable housing in
20 the 90s, and the Buildings Department from
21 1998 to 2014, with one little break for my
22 clerkship after law school.

23 So my last position at the
24 Department of Buildings was Assistant
25 Commissioner for Technical Affairs and

Proceedings

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2 Code Development, and in that role I
3 reviewed projects under these FAR -- FARs
4 and whatever, AMIs, and all that stuff.
5 That's my life blood. What I do, and
6 that's what I did. I issued
7 interpretations, determinations. I worked
8 with the Department of City Planning in
9 formulating some of those zoning text
10 proposals that I then had to enforce,
11 including the key terms, text
12 clarification, the resiliency text, and
13 going back a bit, if anyone remembers,
14 unified bulk, that, too.

15 So I will start by saying that
16 with ZQA, the sky is not falling. The ZQA
17 proposal will not destroy the character of
18 neighborhoods. The proposals solve real
19 and difficult problems faced by
20 architects. Architects trying to
21 accomplish designs that will complement
22 and work with neighborhood character, with
23 what is currently an overly rigged quality
24 housing envelope.

25 So I'm going to break my comment

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2 into two pieces. First, as for the
3 challenges that would apply to all
4 buildings, regardless of affordability
5 components, these are a long time coming,
6 and they're essential if we want our city
7 to avoid another generation of boxy,
8 square, low quality housing buildings that
9 I saw time and again at the Department of
10 Buildings.

11 Really, these current regs
12 leave no other choice for the architects
13 but to design them like this with first
14 floor apartment windows directly at street
15 level, sidewall level, at street level,
16 sidewalk level. Under the current
17 regulations it's not practical to elevate
18 the first floors, the envelope is too
19 tightly prescribed. This is because the
20 front and rear setbacks squeezed the
21 70-foot depth so much that it's not
22 practical to build on top, and the height
23 limits only add to that problem.

24 So ZQA solves a very real
25 problem and allows developers the

Proceedings

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2 flexibility to create beautiful buildings
3 that will enhance and not detract from
4 neighborhoods character. But a necessary
5 component is to allow greater height, it
6 just has to be. A reduction in the front
7 setback for buildings, and the setback at
8 the base, a reduction of the distance
9 between buildings and the elimination of
10 the rear setbacks; it's simple math. If
11 you want the buildings to look better
12 and not be so boxy, you have to allow them
13 to redistribute the bulk they already
14 have.

15 Second, as for the changes that
16 affect affordability and the senior
17 housing, if this city and this Mayor is to
18 address the affordability crisis, and it
19 is a crisis, encourage affordable and
20 senior housing, then these changes are
21 really essential in the ZQA. The most
22 important of these in ZQA, I think, are
23 the proposals for different rules for
24 buildings that include onsite inclusionary
25 housing, onsite affordable independent

Proceedings

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2 residence of seniors, and the affordable
3 adult care facilities. This is needed
4 because the quality housing bulk envelopes
5 do not allow the floor area that they are
6 permitted to use to practically fit at a
7 reasonable cost for these types of
8 developments. And, the removal of
9 unnecessary and archaic discretionary
10 approvals for some these adult care
11 facilities, that should just go away, and
12 the use of community facility use groups
13 for these facilities, and AIRS, the Adult
14 Independent Residence for Seniors, is
15 important. So these are different rules,
16 they need to be there, and I recommend
17 that you approve them. Thank you.

18 THE CHAIRPERSON: Thank you,
19 Mr. Colgate.

20 Questions?

21 (No response.)

22 THE CHAIRPERSON: Thank you very
23 much.

24 Susan Chin.

25 MS. CHIN: Thank you Chairman

Proceedings

1
2 Weisbrod and members of the City Planning
3 Commission for this opportunity to speak
4 in support of key aspects of the Zoning
5 For Quality and Affordability text
6 amendment. I'm Susan Chin, Executive
7 Director of the Design Trust For Public
8 Space, a non-profit dedicated to the
9 future of public space in New York City.

10 Over the past 20 years, the
11 Design Trust helped saved the High Line
12 with our feasibility study, jump started
13 New York's first custom-built taxi with
14 our design recommendations, and developed
15 sustainability guidelines precursor to
16 Local Law 86 and PlaNYC.

17 With every project we act as a
18 catalyst. Our latest project has
19 evaluated ground floor space in mixed-use
20 affordable housing developments. It's
21 essential to the well-being of all New
22 Yorkers as the City creates more
23 affordable housing that we all recognize
24 the diverse character of our communities.
25 New developments that respect and strength

Proceedings

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2 these unique qualities through well
3 designed retail and community space are
4 crucial. Good retail design is flexible
5 to accommodate a variety of uses of
6 differing size, such as restaurants, day
7 care facilities, and supermarkets that
8 contribute to vibrant street life and
9 healthy neighborhoods.

10 Under the existing Zoning
11 Resolution there's a miss-match between
12 permitted maximum building heights and
13 what is needed to design both quality
14 affordable housing units and quality
15 ground floor spaces. A limited height
16 increase of five feet for a new building
17 overall would have a minimal impact on the
18 overall scale of a building, but could
19 encourage significant investments in
20 viable ground floor space. A well
21 designed retail presence, better security
22 and services, improved accessibility with
23 adequate height clearances, greater
24 flexibility of space and uses, and lease
25 ability. Too frequently these vital

Proceedings

1
2 services are scarce and absent in New York
3 City's low- and moderate-income
4 neighborhoods forcing residents to travel
5 further to meet their basic needs. In
6 part this is due to the challenges faced
7 by architects of developers of mixed-use
8 affordable housing, who encounter many
9 design challenges and barriers to leasing
10 ground floor space, often resulting in
11 vacant storefronts and missed
12 opportunities to meet the communities
13 needs.

14 In 2014, the Design Trust's
15 independent jury selected a proposal by
16 the New York City Department of Housing
17 Preservation and Development to evaluate
18 and address these design challenges. Since
19 that time, Design Trust and our fellows,
20 Private Sector experts in retail design
21 and mechanical engineering, have worked
22 closely with HPD to create design
23 guidelines for leasable ground floor space
24 in mixed-use affordable housing.

25 Other City agencies, architects,

Proceedings

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2 developers, business improvement
3 districts, community development
4 organizations, and housing experts
5 provided valuable feedback and
6 participated in an extensive peer review.
7 The fellows identified nine critical
8 success factors fundamental to spacious,
9 flexible, storefronts that can attract
10 local businesses, a variety of sizes that
11 meet the needs of local residents and
12 employees and create more inviting
13 streetscapes, increase lease ability, and
14 create new job opportunities.

15 The proposed zoning text
16 amendment alone will not create quality
17 design, just as our laying-the-groundwork
18 guidelines in totality will not create a
19 great building. Our neighborhoods will
20 reap the maximum benefits from new
21 developments only when they emerge from a
22 meaningful community engagement process,
23 and when our city holds itself, developers
24 and architects, accountable to those
25 aspirations.

Proceedings

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2 The Design Trust encourages the
3 Commission to consider the proposed
4 limited additional height as one element
5 within a broader campaign to achieve not
6 only 80,000 new units, but also the basic
7 services and quality streetscapes that all
8 New Yorkers deserve. Thank you.

9 THE CHAIRPERSON: Thank you,
10 Ms. Chin.

11 Questions?

12 Ms. Ortiz.

13 COMMR. ORTIZ: More of a
14 comment. Thank you just for the work that
15 you've done in support of HPD's efforts to
16 address the issues of ground floor retail.
17 I think it will be tremendously useful as
18 mixed-use buildings go ahead and we're
19 going to have a lot less of the challenges
20 and issues of filling ground floor retail
21 space in the future, so I appreciate your
22 work.

23 MS. CHIN: Thank you,
24 Commissioner.

25 THE CHAIRPERSON: Other

Proceedings

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2 questions? Thank you for your dedicated
3 service.

4 THE CHAIRPERSON: That's it.
5 Thank you. Thank you for coming.

6 The next speaker is the one and
7 only Sandy Hornick.

8 MR. HORNICK: You know, I though
9 the 145 was the hour of morning that I was
10 scheduled to speak.

11 (Laughter.)

12 MR. HORNICK: You know, I had a
13 long thing, but like really.

14 (Laughter.)

15 MR. HORNICK: Good evening,
16 Commissioners, Chairman Weisbrod. My name
17 is Sandy Hornick, I'm a Practicing Planner
18 and Language Consultant.

19 One thing I thought I could add
20 here is how remarkable it is that all of
21 these people have come out in defense of
22 contextual zoning, because 28 years ago,
23 and this was before the Planning
24 Commission, their predecessors were mostly
25 here in opposition, and the hearing was

Proceedings

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2 just as contentious. So 28 years from
3 now, you know, there will be all these
4 people defending ZQA.

5 (Laughter.)

6 MR. HORNICK: As you already
7 know, the City's population is at a record
8 high. It's projected to go to 9 million,
9 but we're already running ahead of the
10 projection, so it's conceivable that we're
11 going to be above 9 million. And let me
12 just say that 9-and-a-half million of
13 anything, let alone people, will not fit
14 comfortably in a container designed for
15 8-and-a-half million.

16 The need to house the elderly
17 are going to grow more dramatically. The
18 population over 65 grew by 50,000 between
19 1970 and 2010, but is expected to grown by
20 400,000 between 2010 and 2040. Pressure
21 on housing prices is not caused by
22 rezonings, if that was the case St. Louis
23 would have 2 million people in it, it's
24 caused by the shortage of housing. I
25 bought a house in Park Slope 40 years ago

Proceedings

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2 with \$6,000 of my own money. I have a
3 500 percent return, or my children will
4 inherit a 500 percent return on that
5 investment and maybe more, and it's not
6 caused by rezonings that produced more
7 housing it's caused by the shortage of
8 housing.

9 I've watch gentrification, which
10 the word didn't exist, in Brooklyn Heights
11 in the 1950s -- and I know this not
12 because I was paying attention, but I've
13 read it in a Fortune Magazine. I was
14 watching a program or something -- going
15 to the brownstones or communities around
16 it in Boreum Hill, in Cobble Hills and
17 Park Slope, and now in Forte Greene, and
18 in Crown Heights, and it keeps moving out
19 because things are getting more and more
20 expensive because more and more people
21 want to live there, and the only way to
22 address that is to rezone for more
23 housing. And just aside from that, I
24 don't think -- I think the 15 rezonings is
25 aggressive, but not aggressive enough to

Proceedings

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2 meet these needs.

3 Current contextual zoning is
4 more than 30 years old. I'm one of it's
5 authors -- there's at least one other one
6 sitting here that may or may not want to
7 take credit -- when adopted, the City was
8 coming off a record low post-war
9 population of 7.3 million people. Very
10 few market-rate houses were being built,
11 the last one in Brooklyn was in 1972. To
12 keep cost flow, floor-to-ceiling heights
13 were determined by the size of sheetrock,
14 then four-by-eight. Almost nothing in
15 that description holds true today. The
16 abandoned areas are reclaimed, Brooklyn
17 leads the City in housing production,
18 sheetrock is available at Home Depot in
19 four-by-ten and four-by-twelve foot
20 panels. Floor-to-ceiling heights are
21 higher resulting in better housing. The
22 Contextual Zoning rules of three decades
23 ago are essentially unchanged.

24 People say this is a
25 one-size-fits-all proposal, it's not

Proceedings

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2 really accurate. There are 20 situations
3 described in ZQA with 17 different height
4 limits, and two Districts without it. In
5 the contextual zoning from R6B to R10X and
6 ZQA has 87 situations described with 27
7 height limits. It's not narrowing the
8 number of choices, it's increasing the
9 number of choices. The argument is it's
10 getting bigger, and that's the concern to
11 reflect.

12 A four -- again, I live in a
13 brownstone neighborhood -- a four-story
14 brownstone like the one I live in, around
15 which the R6B District was designed, not
16 my personal house, cannot be built in an
17 R6B District today because of ADA
18 requirements that were added in 1990.

19 I guess I'm done.

20 THE CHAIRPERSON: You enlivened
21 the day.

22 Ms. De La Uz.

23 COMMR. DE LA UZ: As a fellow
24 Park Sloper, I'm wondering if you could
25 finish your thought.

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(Laughter.)

MR. HORNICK: Well my first thought is, this is as good a public hearing as I've listened to in a very long time, and maybe ever.

I just wanted to talk a little bit about MIH and an observation. First of all, I don't believe -- I live opposite an eight-story building and I have a five-story building behind me, and somehow my house has increased -- doubled in value since they were built, you know, it doesn't destroy the quality of my life. Small differences in height really don't make that much difference. You take Washington Square North, the quintessential rowhouse block, right behind it is a 29-story building, and it's been there for 70 or 80 years.

MIH is not going to solve the need for affordable housing, but again, as one of the authors of the voluntary programs, it is something that it is time to do, and it is also time to go back and

Proceedings

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2 re-look at the old programs. They were
3 designed in another time for less critical
4 issues and it makes no sense to have a
5 mandatory program, in a small number of
6 areas to be rezoned, and in other areas to
7 keep it a voluntary program.

8 What I have heard today that
9 struck me most, is the comment by people
10 that are saying that mandatory is great,
11 but there's a lot of us down here and we
12 don't get that benefit because we're not
13 rich enough or middle-class enough or
14 moderate-class enough to get into that.
15 And I think that that strikes me as the
16 biggest challenge that you have.

17 Somebody, I think it was the
18 Manhattan Borough President, said you're
19 negotiating income bands or you're
20 discussing income bands. But it is hard,
21 there is no guarantee that even if you
22 make the billion dollars available, that
23 developers will take it. Those of us who
24 work in the (inaudible), we see developers
25 come and say, no, I don't want to do it,

Proceedings

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2 you don't know -- how do you make that
3 happen, how do you provide enough
4 incentives, how do you make that happen.
5 I think that really strikes me as the
6 biggest challenge I've heard from all of
7 the critics today.

8 With that, I really am done.

9 COMMR. DE LA UZ: Thank you.

10 THE CHAIRPERSON: Thank
11 you, Mr. Hornick.

12 Questions?

13 Ms. Levin.

14 COMMR. LEVIN: Sandy, I wanted
15 to ask you about another conundrum that
16 we've been confronted here with and that
17 is the argument that neighborhoods have
18 worked tenaciously over long periods of
19 time to achieve a local zoning program.
20 That was, of course, the path that we were
21 on for the last -- large chunk of time.
22 We were going neighborhood by neighborhood
23 doing contextual rezonings. And we've
24 heard some pretty passionate testimony
25 about how the changes that we're kind

Proceedings

1
2 contemplating here may seem benign on the
3 surface, they're not that big a deal but,
4 in fact, they undo what those
5 neighborhoods work so hard to achieve.

6 How would you respond to that?

7 MR. HORNICK: Well first of all,
8 I recognize that. I, you know, was
9 involved in a fair number of those and
10 probably agreed with most of them at the
11 time --

12 COMMR. LEVIN: That's why I
13 thought I would ask you about it.

14 MR. HORNICK: -- not all of
15 them. But I think the answer is that
16 you're confronting very real issues. And
17 to say that the solution you came up in
18 1987 or 1997 or 2007 has to be the
19 solution for all time, and other things,
20 like whether you can actually build the
21 housing, is not as important as preserving
22 the scale, and particularly for the
23 affordable seniors; you have a lot of
24 seniors. I already qualified, not for the
25 affordable part, but for the senior part,

Proceedings

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2 and, you know, we're going to have a lot
3 more people who are seniors and senior
4 housing gets a lot of FAR. And that does
5 not fit in the contextual envelopes. You
6 can't fit, you know, all that stuff
7 practically, 5.01 FAR in the R7A envelope,
8 it's just not a practical way to do it.

9 So you're going to have to do
10 something or you're saying you don't
11 really get that FAR. But you're going to
12 have all those old people, and you're
13 really going to have all those extra
14 people. And if you don't deal with that,
15 the housing prices are really going to go
16 up.

17 People, it always sounds like,
18 well the City will all be rich when that
19 happens, which from a tax point of view
20 would be great, but it's not really what
21 happens in the real world. Every time you
22 look at the numbers, the poor people are
23 still here. And what's happening to them
24 is their housing situations are getting
25 worse and worse; they're doubling up,

Proceedings

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2 they're tripling up, they have more
3 roommates, they live in -- all the things
4 that -- it doesn't go away by not
5 addressing the problem. You know, whether
6 we can do enough to address the problem is
7 a separate question, but not addressing it
8 is the worse possible solution.

9 THE CHAIRPERSON: Thank you.

10 Any other questions for
11 Mr. Hornick while we have him?

12 (No response.)

13 THE CHAIRPERSON: You're free.

14 (Laughter.)

15 THE CHAIRPERSON: Thank
16 you, Mr. Hornick.

17 We are now switching again to
18 those who are in opposition: James
19 Rodriguez, Mr. Sean Khorsandi, Francisca
20 Benitez, Christabel Gough, and Elizabeth
21 Ashby.

22 Mr. Rodriguez here?

23 (No response.)

24 THE CHAIRPERSON: No.

25 Mr. Khorsandi here?

Proceedings

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(No response.)

THE CHAIRPERSON: No.

Ms. Benitez here?

MS. BENITEZ: Yes.

THE CHAIRPERSON: Sorry. Thank
you for your patience.

MS. BENITEZ: Thanks for yours.
Dear Fellow Citizens and dear Commission,
thank you for hearing my testimony. I'm
here as an inhabitant of New York; I live
in Chinatown. But I'm also here to speak
on behalf of NMASS, the National
Organization Against Sweatshops.

We're here to oppose ZQA and MIH
because we feel it doesn't consider us at
all, and you heard this already, but I
still want to say it. Urban Planning
impacts our lives and our communities
directly, and we're here to participate in
shaping these plans. Specifically we're
here to ask you to approve our
community-led plan, the Chinatown Working
Group Rezoning For Chinatown and Lower
East Side, seven years in the making

Proceedings

1
2 through a rigorous participatory process,
3 wide-neighborhood coalition, and the
4 highest professional expertise.

5 We're tired of the Mayor's
6 condescending attitude, treating
7 community-based planning as a joke. We're
8 here to remind you that it's not a joke.
9 It's a real process, with real people,
10 real hard work, and it's brought forward
11 some of the best planning being done in
12 New York City. Our community-based plan
13 basically puts people first, not the
14 profit for the developers first, or the
15 guiding thing.

16 We won't remain silent as each
17 neighborhood is being stripped of it's own
18 unique, distinct character to make way for
19 ultra-luxury high-rises. We're not going
20 to accept the power of developers as
21 inevitable. We're here to tell you that
22 we won't settle for crumbs.

23 Do you think we can be fooled
24 with the fallacy of trickle-down
25 economics? Settling for ridiculous

Proceedings

1
2 percentages of still unaffordable housing
3 and poor people'S doors? The affordable
4 plan is still beyond reach for the
5 majority of our community and for
6 low-income people.

7 Since 2008 when the East Village
8 Rezoning Plan was approved, we seen so
9 much of luxury development in the Lower
10 East Side and in Chinatown because we were
11 excluded from that protection. Why is it
12 that us, low-income people and communities
13 of color are being ignored?

14 With a homeless population of
15 75,323 people, 4.2 unsheltered, and
16 growing numbers of people one paycheck
17 away from homeless, do you think pandering
18 to developers is acceptable?

19 The people of Chinatown and the
20 Lower East Side want to be heard. Our
21 neighborhood wants roads to oppose the
22 Lower Manhattan Expressway and we're
23 rising now again. It's time to demand the
24 approval of our plan. We won't be
25 silenced. We firmly say no to

Proceedings

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2 developer-led rezonings, and we say yes to
3 community-led rezonings.

4 Thank you for hearing our
5 testimony and our criticism to the plan is
6 embedded in our plan that we have
7 submitted. And if you haven't seen it,
8 it's online in Chinatown working group or
9 in People's First (inaudible).

10 Thank you so much.

11 THE CHAIRPERSON: Thank you,
12 Ms. Benitez.

13 Questions?

14 (No response.)

15 THE CHAIRPERSON: Thank you.

16 Next speaker is Christabel Gough.

17 MS. GOUGH: Good evening. I'm
18 Chistabel Gough speaking for the Society
19 for the Architecture of the City, which is
20 an all-volunteer preservation advocacy
21 group.

22 As we understand it, this
23 hearing serves both as part of the ULURP
24 review of ZQA and MIH, and as an
25 opportunity to comment on the ZQA DEIS.

Proceedings

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2 Although ZQA and MIH are before us in
3 tandem for ULURP, only ZQA is in process
4 of receiving environmental review because
5 the CPC Author of the Amendments is also
6 the lead agency for their environmental
7 review.

8 The CPC has issued a negative
9 declaration for MIH exempting it from
10 further environmental scrutiny on the
11 grounds that MIH will have no effect on
12 the environment until it is mapped or
13 implemented by subsequent discretionary
14 decisions of the City Planning Commission.
15 We do not understand how this responds to
16 the decision in Fisher verses Giuliani,
17 where the court found that, quote, the DCP
18 was of the few that no environmental
19 review of the these amendments was
20 required because when an owner applied for
21 a special permit an assessment would be
22 made at that time. Hence, the DCP
23 believed it could defer it's analysis.

24 This was an error. It is well
25 settled that Seacrest's goal it to

Proceedings

1
2 incorporate environmental considerations
3 into the decision making process at the
4 earliest opportunity. Although
5 theoretically the purpose of environmental
6 review is to provide information to
7 decision-makers, peculiarity of New York's
8 rules allows the ULURP, or indeed requires
9 the ULURP, to be initiated before
10 environmental review on a zoning text
11 amendment is complete, so that decisions
12 issued during the ULURP process are made
13 without the benefit of a completed EIS.
14 However, the draft EIS, which we do have,
15 found that ZQA would cause significant
16 negative impacts on historic rezoning that
17 could not be mitigated. That we think is
18 correct. The changes to height, bulk, and
19 massing requirements encourage alteration
20 and demolition of existing buildings
21 whether or not they are historic. And
22 historic buildings that are listed on
23 state and national registers will have no
24 protection against such alterations, while
25 City Landmark Districts will experience

Proceedings

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2 significant pressures to conform.

3 We find these amendments are
4 also deficient in terms of their stated
5 purpose. At least, however, this
6 initiative has finally brought home to
7 thousands of New Yorkers, that the federal
8 area-median income, AMI, is a very
9 deficient measuring tool for the City even
10 when addressed with percentages. It
11 averages some of the wealthiest ZIP codes
12 in the United States, as well as many of
13 Westchester's most popular suburbs, when
14 determining what is, quote, affordable, to
15 the low-income workforce here. If there
16 had been environmental review of MIH,
17 alternatives would have been considered.
18 But as it is, incentivizing real estate
19 investment is, we think, wrongly presented
20 as the only possible solution to the
21 housing problem.

22 And since the bell hasn't rung
23 yet, may I say that I'm one of the these
24 senior citizens who's being discussed so
25 much tonight, and I personally find it

Proceedings

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2 incredibly offensive that I think I'm
3 being used as pretext, because the senior
4 housing is not permanent. And when it
5 expires that will be an opportunity for
6 units that could not otherwise have
7 existed to be rented and such as housing.

8 Thank you.

9 THE CHAIRPERSON: Thank you,
10 Ms. Gough.

11 Questions?

12 (No response.)

13 THE CHAIRPERSON: Thank you.

14 (Whereupon, Kari L. Reed
15 replaces Nicole Ellis as the hearing
16 reporter.)

17 THE CHAIRPERSON: Our next
18 speaker, is Elizabeth Ashley not here?

19 AUDIENCE MEMBER: I think she
20 had to go home. She was here tonight.

21 THE CHAIRPERSON: Turning again
22 to those in favor. The next five speakers
23 are George James or Jamis, James.
24 Elizabeth Kurtz scott Short. Ryan
25 Cassidy. And Jorge Carlos Chang.

Proceedings

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And you are?

MR. JAMES: Hi. Yes, I'm George James.

THE CHAIRPERSON: Welcome.

MR. JAMES: I'm an urban planner, and I've been helping Community Board 11 community groups, the construction union and others in their understanding of MIH and ZQA. But none of them asked me to speak for them today, and so thankfully I can speak for myself.

So I was out, I was buying holiday cards for the holiday season, and I saw this card right here, which has a beautiful shot it's tiny, so I'll describe it. It has a view from Central Park to the San Remo Twin Tower buildings along Central Park. It's a beautiful shot, wonderful, iconic New York City building which is one of the many buildings that the zoning resolution outlawed in 1961. Can't be built under current zoning.

So, as you know, we have been patching our zoning ever since, trying to

Proceedings

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2 make it not so bad. And ZQA is likely the
3 largest patch we've ever attempted. I
4 have no doubt that because of the many
5 technical changes to ZQA, we will get
6 better buildings and a wider variety of
7 building forms, including the now illegal
8 Twin Tower buildings. But this is not why
9 I came here to speak about ZQA.

10 These technical changes are
11 important. But realistically, most New
12 Yorkers do not care about them and will
13 not notice them. The largest benefit of
14 ZQA to everyday New Yorkers is the changes
15 it makes to affordable senior housing.
16 The current not-for-profit residences for
17 the elderly is as antique as the zoning
18 resolution, and was designed on a vastly
19 different model of how we view senior
20 living. We've seen massive changes in how
21 senior housing is built and managed mostly
22 outside of New York City, but the zoning
23 resolution has not kept up at all.

24 ZQA provides a prudent senior
25 housing production and flexibility so that

Proceedings

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2 we should get more of it. And this city
3 and this region desperately needs more
4 affordable housing. And note that I say
5 affordable housing and not affordable
6 senior housing. ZQA will likely be by
7 itself a pretty effective affordable
8 housing production program.

9 The bonuses for affordable
10 senior housing are given in most districts
11 citywide, whereas MIH are limited to areas
12 with upzoning so what if your neighborhood
13 already has appropriate density? MIH
14 doesn't do anything for you. But ZQA can
15 produce affordable housing just about
16 everywhere.

17 Now, I've read every word of MIH
18 and ZQA, and in fact some parts I had to
19 read six or eight times, engage in an
20 almost talmudic discussion about its
21 meaning and consequences. It's long and
22 complicated, it's ambitious. It's also
23 not perfect and possibly needs changes.
24 And there remains a serious omission in
25 the environmental review that I will

Proceedings

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2 address in written comments. But just
3 because it's not perfect does not mean
4 that it is not good and good for New York.
5 So thank you for your efforts.

6 THE CHAIRPERSON: Thank you,
7 Mr. James.

8 Questions?

9 (No response.)

10 THE CHAIRPERSON: Thank you very
11 much. And I gather you're going to submit
12 written comments?

13 MR. JAMES: Yes.

14 THE CHAIRPERSON: Thank you very
15 much.

16 COMMR. DE LA UZ: Yes, thank
17 you.

18 THE CHAIRPERSON: Emily Kurtz.

19 MS. KURTZ: Good evening. I
20 feel like I should ask if you need to
21 stretch or if --

22 (Laughter.)

23 MS. KURTZ: You probably all --
24 all of us want to go home, so...

25 Good evening, Chairman, Vice

Proceedings

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2 chairman, Commissioners. My name is Emily
3 Kurtz. I am the Deputy Housing Director
4 for the Ridgewood Bushwick Senior Citizens
5 Council I have worked with Angela
6 Battaglia for 11-and-a-half years. She
7 has asked me to send you her warmest
8 regards and her regrets that she could not
9 be here personally to express her
10 wholehearted support for these zoning text
11 amendments. I'm also curious if she ever
12 stayed this late. I'll have to ask her
13 that tomorrow.

14 THE CHAIRPERSON: She did.

15 MS. KURTZ: I'm sure she did.

16 And I am very pleased to have
17 the opportunity to testify before you
18 today -- tonight on behalf of the ZQA text
19 amendment while there are so many
20 favorable components of this amendment, I
21 will primarily focus my comments on site
22 coverage and underutilized parking for
23 senior buildings.

24 Our agency has developed or
25 sponsored over 3,000 units of affordable

Proceedings

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2 housing in Brooklyn, over 550 of which are
3 dedicated to low income seniors. The
4 seniors living in our buildings live in
5 secure, well managed and supportive
6 environments. Each building has onsite
7 service coordinators available to provide
8 assistance with appointment scheduling,
9 entitlement access and coordination, and
10 many other challenges faced by our
11 residents. Our residents enjoy a range of
12 onsite social activities, such as oil
13 painting, Tai Chi, and Zumba, and are also
14 offered a chance -- I haven't been able to
15 do it, but the seniors are amazing at it.
16 And also ballroom dancing, I should have
17 added is a -- yeah, not for me, but
18 they're great. And are also offered
19 transportation to nearby senior centers.

20 Best of all, each of our senior
21 residents pays only 30 percent of their
22 income towards rent, thanks to project
23 based Section 8 contracts.

24 Every effort made to realize
25 these projects -- and it is quite an

Proceedings

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2 effort -- is validated by the fact that
3 they provide essential units of housing to
4 a vulnerable population that is predicted
5 to grow to unprecedented levels in the
6 next two decades; ZQA can make the process
7 easier by removing impediments to building
8 to the highest and best use of any lot.
9 For example, we have determined that under
10 the ZQA amendment, a development in our
11 pipeline would improve by a 20 percent
12 increase in the number of housing units,
13 in addition to creating a more inviting
14 and flexible ground floor community
15 facility space to accommodate a large,
16 federally qualified health center. This
17 is achieved through a reduction in the
18 required parking and adjustments to rear
19 yard requirements on irregular lots.

20 As the market for development
21 sites continues to escalate citywide, the
22 proposed amendments under ZQA are
23 necessary to level the playing field so
24 that affordable senior housing developers
25 are able to continue to build critical

Proceedings

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2 apartments for our city's aging
3 population.

4 The parking lots at our senior
5 buildings are severely underutilized, as
6 they are restricted to residents and staff
7 only, and very few of our residents own
8 cars. Should ZQA pass, we have identified
9 four existing projects that could
10 potentially support development of
11 additional units of affordable senior
12 housing to think that the precious
13 resource of buildable land is dedicated to
14 under-utilized parking lots in the
15 neighborhoods that we serve and across the
16 city is frustrating, especially to those
17 of us who routinely -- who are routinely
18 contacted by low income seniors or by
19 their families, desperate to find
20 affordable housing. This is a daily
21 occurrence, and it is heartbreaking.

22 Finally, I also endorse the
23 Mandatory Inclusionary Housing text
24 amendment because too often in our
25 neighborhoods we have seen vast private

Proceedings

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2 wealth conferred on landowners and
3 developers through rezonings with little
4 public benefit received in return I am
5 thankful to the Mayor's office and the
6 Department of City Planning for proposing
7 both the Zoning for Quality and
8 affordability and the Mandatory
9 Inclusionary housing text amendments, and
10 I fully support their implementation.

11 Thank you. And I speak on
12 behalf of Scott Short and on behalf of
13 Ryan Cassidy so kind of move forward to
14 the next one. Thank you very much.

15 THE CHAIRPERSON: It's extremely
16 efficient and we are grateful. And just
17 please do send our regards and love to
18 Angela Battaglia.

19 MS. KURTZ: I absolutely will
20 thank you. I'm sure she will appreciate
21 it, thanks.

22 THE CHAIRPERSON: The next
23 speaker is Jorge Carlos Chang.

24 Is he here?

25 (No response.)

1 Proceedings

2 THE CHAIRPERSON: No, okay.

3 Switching now to those opposed,

4 Lo van der Valk, Angel Mescia, Elena

5 Conte, Page Cowley, and Barry Weinberg.

6 Any of those here?

7 (No response.)

8 THE CHAIRPERSON: None?

9 Okay going back to those in

10 favor: Adrian Weiblen, Caroline Harris.

11 Is Caroline here?

12 MS. HARRIS: Yes.

13 THE CHAIRPERSON: There she is.

14 Adrian Weiben -- Weiblen, from

15 Urban Justice Center. No?

16 (No response.)

17 COMMR. DOUEK: Caroline, the

18 last time you gave testimony you took

19 about an hour. Can we condense it

20 tonight?

21 MS. HARRIS: Don't ask me any

22 questions.

23 (Laughter.)

24 THE CHAIRPERSON: Good evening,

25 Caroline.

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MS. HARRIS: Good evening
commissioners, Chairman and Commissioners
and the staff that still stands, sitting,
and the few of you who are still here
tonight. I am Caroline Harris, partner at
Goldman Harris, a land use and zoning firm
in New York City. I'm testifying today in
a personal capacity to support the ZQA
amendments to the zoning resolution,
especially the parking regulations and to
comment on MIH. I have a few tweaks on
both, but generally I'm supportive.

There are three benefits to the
ZQA amendments, as you well know. First,
they release the strait jacket that unduly
constrain the envelope of inclusionary
housing bonus related buildings,
especially a mixed-use building with a
retail base. The additional height that
would be allowed under these amendments is
not great, and the aesthetic benefits are
worthwhile.

As an aside, parenthetically, I
believe that more height and more floor

Proceedings

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2 area in everyone's backyard in a big city
3 like ours is reasonable and necessary to
4 accommodate our current and future demand
5 for housing of all income levels. Maybe
6 not for the billionaires, they can stay at
7 57th Street, but generally throughout the
8 city I think the only way to produce more
9 housing, we can't create more land, we're
10 not Texas, thank goodness, but we need to
11 go up. And so I think that's an important
12 and reasonable trade-off. In this case
13 it's a very small trade-off.

14 I have a technical tweak that
15 I'd like you to consider, which is that
16 you've required matching street wall of
17 adjacent properties in the higher density
18 districts as a requirement. I think it
19 maybe should be an option as a -- instead,
20 because it could result in a loss of floor
21 area.

22 The second benefit of the ZQA
23 amendments, of course, is to facilitate
24 more affordable senior housing, long-term
25 care facilities, and spectrum of care

Proceedings

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2 facilities modernizing the text and
3 responding to an urgent need for those
4 uses. Others have spoken much more
5 eloquently than I can about that, but none
6 too soon for my generation and those a
7 little ahead of us, ahead of me.

8 Finally, the amendment
9 eliminates the parking requirements for
10 new affordable housing located within
11 transit rich low car ownership areas. The
12 1961 parking requirements are out of date
13 and excessive for New York City of 2015,
14 especially for senior affordable and lower
15 income housing. The high cost of
16 constructing space is estimated at 30 to
17 50,000 dollars per space, diverts scarce
18 funds away from constructing apartments.
19 We should favor living spaces over parking
20 spaces.

21 I also support the waiver to
22 reduce or eliminate previously required
23 parking for existing affordable housing.
24 The proposed text grants BSA jurisdiction
25 over the waiver sensibly, when a large

Proceedings

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2 scale plan is being considered by City
3 Planning, the text also gives City
4 Planning jurisdiction to grant the waiver.
5 I recommend that the jurisdiction of City
6 Planning to grant such a waiver extend to
7 any project, not just a large scale plan.
8 Any project that's otherwise being
9 reviewed by City Planning to avoid having
10 to go to two forums so please consider
11 that.

12 For the future, after you've,
13 you know, rest up from this, I encourage
14 City Planning to consider reducing parking
15 requirements for all other residential
16 buildings, and for all other uses in the
17 City where -- particularly where you're in
18 a transit -- transit rich area.

19 I hesitate to comment on the
20 proposed Mandatory Inclusionary Housing
21 program because, frankly, I don't
22 understand the financing. It's not my
23 area, I don't -- I don't see how it all
24 works. The pieces that I do understand
25 that I can relate to and feel like I can

Proceedings

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2 comment on -- but let me say that I trust
3 that the people at this table behind you
4 in City Planning, at HPD, City Hall,
5 hopefully know what all these finances --
6 how the finances are going to work. And I
7 say that also with some concern, that if
8 the other funding mechanisms that are
9 necessary for the MIH to work, 421-a, City
10 subsidies, if those pots of money aren't
11 available, what happens to the MIH. It's
12 just a question, I'm not being -- I'm sure
13 you've thought about it I'd love to know
14 what the answer is. You don't have to
15 take my four minutes to do it, you can do
16 it after my four minutes.

17 (Bell rung.)

18 THE CHAIRPERSON: There are your
19 four minutes.

20 MS. HARRIS: There they go,
21 okay.

22 So could I just wrap up to say
23 that I think we need to have -- I like the
24 opportunity to pay money into a fund for
25 smaller projects. I think we need to

Proceedings

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2 spell out what special permits will be
3 exempt from the MIH requirement in a
4 public -- in a publicly vetted -- with
5 publicly vetted standards.

6 I applaud all of you not only
7 for your endurance today, but for the hard
8 work that you and the staff and other city
9 agencies HPD, have put into coming up with
10 a very complicated -- it's not that it's
11 complicated it is complicated, but you're
12 addressing a very complicated problem.

13 THE CHAIRPERSON: Thank you,
14 Caroline.

15 Questions, any questions to
16 Ms. Harris?

17 (No response.)

18 THE CHAIRPERSON: Thank you very
19 much.

20 MS. HARRIS: I got off easy
21 today.

22 (Laughter.)

23 THE CHAIRPERSON: Vickie Carter
24 who I gather is not here.

25 Luis, is it Harrigan Carrera

Proceedings

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2 from Legal Services New York.

3 (No response.)

4 THE CHAIRPERSON: Not here.

5 Stephen Smith?

6 MR. SMITH: Yes. Hello,
7 Commissioners. My name is Steven Smith.
8 I work for a real estate development
9 firm -- I'm sorry, investment firm. We're
10 actually not developers. But I am here
11 speaking on my own behalf. I'd like to
12 focus my comments on the City's parking
13 requirements. By national standards, the
14 reforms you guys are proposing are pretty
15 timid. In my opinion, even market-rate
16 developers should not have to build
17 parking. In cities across the U.S., with
18 much worse transit than New York they've
19 come to realize the folly of these
20 requirements.

21 In Minneapolis, a city without a
22 single mile of subway track, you can now
23 build up to 50 units near a frequent bus
24 line without any parking. By New York
25 City standards that's basically the entire

Proceedings

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2 city. Portland has similar rules. And
3 even in Houston you can build without any
4 parking downtown, but back here in New
5 York, with the best transit in North
6 America, much smaller, new buildings in
7 neighborhoods uptown and the neighborhoods
8 all require parking over ten units in an
9 R6 zone.

10 These rules were bad when they
11 were first imposed in 1961 back when this
12 commission thought the answer to the
13 City's woes was to be -- to make it more
14 like the suburbs. Given what we now know
15 about climate change, urban design and
16 housing affordability, the parking
17 requirements are indefensible.

18 Finally, I'd like to talk about
19 parking in a neighborhood context. You
20 often hear at hearings like these that
21 developers should respect the existing
22 built context. Well, of the more than
23 50,000 residential buildings with six or
24 more units built before 1945, only 237,
25 according to the City's data base, have

Proceedings

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2 garages. So please consider not only
3 going through with the parking changes in
4 ZQA, but also loosening the minimums for
5 all projects, including the unsubsidized
6 housing that the vast majority of New
7 Yorkers live in.

8 Thank you.

9 THE CHAIRPERSON: Thank you,
10 Mr. Smith, that was very efficient.

11 Any questions?

12 COMMR. DE LA UZ: And you're the
13 first person to refer to --

14 (Laughter.)

15 MR. SMITH: You guys can clean
16 it up a little bit, but it's pretty good.

17 THE CHAIRPERSON: Any questions?

18 (No response.)

19 THE CHAIRPERSON: Thank you very
20 much.

21 MR. SMITH: You're welcome.

22 THE CHAIRPERSON: Switching once
23 again to those in opposition, the next
24 five speakers are K. Webster, Leslie
25 Doyel, Suwer Cheong, Egeria Bennett and

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Mark Diller.

Any of those five here?

(No response.)

THE CHAIRPERSON: Hearing none
switching to those in favor. Slater
Beckerman is that a firm?

AUDIENCE MEMBER: Stuart.

Stuart.

THE CHAIRPERSON: What?

AUDIENCE MEMBER: Stuart

Beckerman.

THE CHAIRPERSON: Stuart

Beckerman. They put down Slater, okay.

John Napolitano, Nathan Rich, Robin

Kramer. I don't see her.

Eric Toro.

THE VICE CHAIRMAN: He's gone.

THE CHAIRPERSON: Gone.

Switching to those opposed:

Willy Zambrano, Jane McCroaty.

COMMR. DE LA UZ: She left.

THE CHAIRPERSON: Jonathan

Gesalle, Community Board 2.

Linda Eskenas.

Proceedings

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MS. ESKENAS: Here.

THE CHAIRPERSON: Here?

MS. ESKENAS: Yeah.

THE CHAIRPERSON: Okay. Thank
you for your patience.

MS. ESKENAS: Thank you.

Linda Eskenas, the North Shore
Waterfront Greenway on Staten Island, Four
Boroughs Neighborhood Preservation
Alliance, West Brighton Restoration, and
Richmond Terrace Conservancy.

The proposed zoning text
amendments have really nothing to do with
affordable housing. The entire City, as
you must know, voted against both of them
in almost every community board in all the
boroughs of New York. There was a huge
turnout of members of the public who
adamantly rejected both of these
amendments. Both community board members
and other New Yorkers have totally
rejected these amendments. It is said
that they only benefit the real estate
developers and seem to be written by

Proceedings

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2 REBANY, the Real Estate Board of new York.

3 Any zoning amendment must
4 benefit our great city and not bring harm
5 to it. Hard-fought-for protections for
6 our neighborhoods and for our city are
7 swept away by these amendments, from old
8 law tenement reforms to recent destructive
9 overdevelopment, et cetera. New York
10 City, the greatest city in the world, is a
11 city of historic neighborhoods. There
12 must be in place intelligent planning so
13 that we can have the magnificent future
14 that we must have.

15 This is an -- there is an urgent
16 need for City Planning to work with
17 communities. The destructive 1961 zoning
18 on the northwest shore waterfront on
19 Staten Island has caused the economy to
20 collapse, created public health and
21 traffic hazards, destroyed people's homes
22 and America's greatest asset waterfront,
23 access and our heritage. This is what
24 needs to be immediately addressed and this
25 is what will create a great future.

Proceedings

1
2 Forcing dangerous industrial
3 zones on once thriving communities where
4 people live, and destroying them further
5 by allowing this dangerous zoning to block
6 our waterfront, must never be allowed.

7 We want to work with City
8 Planning to create a great New York. Each
9 community is different. It's impossible
10 to have one rejective -- rejected
11 destructive plan forced on our great city
12 that doesn't want it. We are part of a
13 great historic -- we are a city of great
14 historic neighborhoods that everyone wants
15 to be a part of. We must work together to
16 save the identity of New York. City
17 planning must work with New York.

18 I just wanted to say something
19 about small owners. There was something
20 that was said earlier, it was kind of
21 chilling, and that was to -- about tenant
22 protections. And it just reminded me,
23 around 1984, when so many small owners
24 lost their homes because they were taken
25 from them. I don't know if you remember

Proceedings

1
2 that, but you should. And it was the
3 small owners who in the 60s, 70s and early
4 80s saved New York by going into crime
5 ridden areas going into these beautiful
6 houses, which were a disaster, and saving
7 them with their own hands this is what --
8 this is what saved New York and are now
9 the most beautiful neighborhoods in any
10 case, nobody really wants this. I mean,
11 we're talking about the community boards
12 and the hundreds of people that showed up
13 at each community board. And you should
14 know that. It's not going to work it's
15 senseless.

16 Thank you.

17 THE CHAIRPERSON: Thank you,
18 Ms. Eskenas.

19 Questions?

20 (No response.)

21 THE CHAIRPERSON: Thank you.

22 Zack Winestein?

23 (No response.)

24 THE CHAIRPERSON: Okay.

25 Switching back to those in favor, the next

Proceedings

1
2 three speakers: Jay Marcus, Quinn Raymond
3 and Susan Gass.

4 Any of them here? Who?

5 MR. RAYMOND: Quinn Raymond.

6 THE CHAIRPERSON: Quinn Raymond,
7 okay.

8 MR. RAYMOND: Am I your -- am I
9 the last speaker?

10 THE CHAIRPERSON: No, by no
11 means we have hours to go here.

12 MR. RAYMOND: I am both relieved
13 and I feel sorry for you guys, I'm sorry.
14 My name's Quinn Raymond. I support the
15 MIH and ZQA proposals. I was born and
16 raised in a rent stabilized tenement on
17 the Lower East Side. Five years ago I
18 moved to Brooklyn Heights to the historic
19 district that was a bit of a culture
20 shock. Over the years working --

21 (Laughter.)

22 MR. RAYMOND: If either of
23 you -- if any of have you been to either
24 of those places, it's a little different.

25 But over the years working, and

Proceedings

1
2 now just volunteering and grassroots
3 activism, I've seen a lot of battles
4 between local communities and the City and
5 developers, as I am sure you all have,
6 more than I have. And most recently in
7 Brooklyn heights we've seen an extremely
8 determined group of NIMBYs trying to block
9 a new library project. But then also at
10 the same time in Brooklyn Heights we have
11 seen this fiasco with this Brooklyn Bridge
12 Park project with the, I think it's called
13 the Pier House, where there was an
14 agreement with the community and the local
15 electeds, and they were going to build it
16 this high and they built it that high.
17 And I think that both of those were
18 indicative of the same problem, and maybe
19 some of the resistance that has been
20 encountered here, which is that there's no
21 trust between the community and
22 developers. And when the community and
23 local electeds sit down with developers to
24 win concessions on a case by case basis
25 with upzoning, there's zero enforceability

Proceedings

1
2 often right. So you sit down, you hash
3 out a deal and the developers may or may
4 not actually follow that deal.

5 It's an MOU, it's a handshake,
6 it's not necessarily a binding agreement.
7 And so people in the community become very
8 distrustful because there's very strong
9 incentives for developers to ignore those
10 agreements. And this is the status quo of
11 community engagement again and again and
12 again. And obviously some part of this is
13 you guys cleaning up the mess from the
14 last administration and the one before
15 that where promises would be made and then
16 broken. And it's I think very frightening
17 and aggravating to be a member of a
18 community and know that when you sit down
19 to negotiate, it's not necessarily always
20 in good faith when you're talking to a
21 developer, or in the past with the City.
22 So, you know, these local politicians and
23 the developers have huge incentives for
24 abuse, and there's no enforceability.

25 To that end, the value I see in

Proceedings

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2 Mandatory Inclusionary Housing is that
3 it's not another one-off concession at a
4 single site developer. It's not between
5 this guy and that guy. It's not a
6 handshake with spit on it it's not an MOU.
7 It's an enforceable aspect of zoning. But
8 it's only enforceable in theory right.
9 Someone has to actually enforce it at some
10 point.

11 So I'm hoping that this is the
12 foundation for a situation moving forward
13 where people do what they say they're
14 going to do and I have to say that as a
15 transit and a walkability advocate, I
16 support the focus on transit-oriented
17 development that you guys have put into
18 this. I really deeply appreciate that.
19 And the elimination of parking
20 requirements for affordable projects, I
21 wish you would eliminate all parking
22 requirements, and I can't say that
23 emphatically enough and with enough
24 passion.

25 I know you get a lot of crazy

Proceedings

1
2 NIMBYs all over the City who want to
3 protect parking. It's completely insane.
4 This is a very old, backwards way of
5 thinking. Please, please, please, any
6 opportunity you have to get rid of these
7 mandatory parking requirements, get rid of
8 them. They are a blight on the City.
9 They are redutive of affordability. They
10 suck they're. Horrible, stop --

11 (Laughter.)

12 MR. RAYMOND: -- please stop it.

13 I'm sorry, I just wanted to
14 bring a little passion to that issue
15 because I think most of the people who
16 speak about it know a lot more about it
17 than I do. But I think a lot of the
18 people who are supportive of these parking
19 requirements are very passionate and very
20 crazy, so I want to be crazy and
21 passionate, too, and let you know that not
22 everyone thinks that way.

23 And I just want to wrap up by
24 touching on the burden placed on our
25 infrastructure by these upzoning

Proceedings

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2 proposals. So those concerns are real,
3 and I think that they're reasonable, you
4 know. And a lot of these concerns focus
5 around the schools and the overcrowding of
6 schools and the mass transit and the
7 overcrowding with mass transit network
8 experience, with the highest ridership in
9 the modern history of the system.

10 (Bell rung.)

11 MR. RAYMOND: So I'll just wrap
12 up, a final couple of sentences.

13 The funding that the federal,
14 state and city provide for the MTA is a
15 joke, it's an embarrassment. I know you
16 guys can't do anything about that from
17 where you're sitting, but until that mass
18 transit bottleneck is addressed, it's
19 going to really be hard to get reasonable
20 people in the community to be supportive
21 of upzoning. And I think that's the same
22 with the overcrowding in the schools.
23 These are actually legitimate concerns.
24 And I know they're not necessarily your
25 purview in this instance, but they're

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going to be political barriers.

But I just want to stress I really support this. Thank you so much.

THE CHAIRPERSON: Thank you thank you, Mr. Raymond. I will say, I will just say one comment, which is I think you put -- you identified the essence of Mandatory Inclusionary Housing, regardless of how one feels about its various components, what the essence of it is to provide a degree of predictability, a degree of transparency and to try to limit, if not avoid altogether, the one-off deals that have been such a typical product of our past 25 years.

MR. RAYMOND: Thank you, Commissioner. Thank you for your patience.

THE CHAIRPERSON: Thank you.
Any questions to Mr. Raymond?

(No response.)

THE CHAIRPERSON: Thank you.
Susan Gass, is she here?

(No response.)

Proceedings

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THE CHAIRPERSON: Jay Marcus is here, after all?

MR. MARCUS: Yes.

THE CHAIRPERSON: Welcome, Mr. Marcus.

MR. MARCUS: Hi. Actually, I came from a meeting where I was hearing the other side of the parking issue. And I know a community board that's a little concerned about that, like some of the proposals here.

But I'm here on behalf of Fifth Avenue Committee. We are a non-profit community development agency that focuses on promoting social justice and economic justice. We do that through our programs in job training adult literacy, community organizing and affordable housing. And I'm actually here to support a lot of the provisions of the ZQA because we're dealing with projects where when we read it we were kind of like, yes, this is what we need to help get these projects to happen.

Proceedings

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2 I also did want to express,
3 because I've sat through two of the
4 community board presentations that your
5 staff has done on MIH and on ZQA, and it's
6 extremely impressive, and I really think
7 if there's any chance that this is going
8 to pass, as I hope and think it will, it's
9 really because of the talent and skill of
10 this DCP staff, both in being able to
11 explain the difficult concepts to the
12 communities, and also understanding the
13 communities' concerns and seeking to
14 address it. And some of the modifications
15 that have already been done, I think
16 reflect that. And my guess is after today
17 you may have a couple more.

18 THE CHAIRPERSON: Thank you for
19 that, on behalf of the staff, which really
20 did do an amazing -- an amazing outreach
21 effort here, but thank you.

22 MR. MARCUS: They were very
23 good.

24 But we are long-term advocates
25 for both mandatory and community

Proceedings

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2 affordability. So we're glad it's in most
3 of it, and we hope you'll put it in the
4 senior. And so we are very pleased to see
5 the City is moving ahead on this effort.

6 I wanted to kind of raise, just
7 sort of from a non-profit developer
8 standpoint, why ZQA can offer us a lot of
9 the tools we need. So two of the projects
10 we are doing because we are doing a
11 hundred percent affordable housing, one,
12 we are putting health clinic on the first
13 floor, the other we'll be coming before
14 you with ULURP later on is going to have a
15 library on the first floor; both of those
16 require those higher ceilings on the first
17 floor. And that five additional feet
18 would really mean that we don't have to
19 have our residential ceilings a lot lower
20 than we want for a hundred percent
21 affordable project we want to treat the
22 people with respect.

23 One of the projects we are doing
24 is a senior project. And I was kind of
25 surprised because we actually wanted to

Proceedings

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2 get larger studio apartments, over
3 450 square feet for our studios, our
4 average studios, and larger one-bedroom
5 apartments. And yet, because of the unit
6 density count, we actually had to cut back
7 on the number of units that we could have
8 otherwise had on that site. On that,
9 actually that site another feature that we
10 were very glad to have in here is a lot of
11 the creativity that you have when you're
12 in a contextual area. So this is -- this
13 is a place where we are adjacent to a very
14 nice brownstone block. But we want to
15 kind of maintain a lot of what's good
16 about that block. And two things in ZQA
17 would help us promote that.

18 One is for the 25 feet that are
19 adjacent. In addition to meeting the
20 setback the height requirements, we are --
21 wanted to set back the building to be --
22 to be contextual with those setback
23 townhomes. But when we do that, it's
24 requiring our setback to unfortunately be,
25 as you know, against the actual building

Proceedings

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2 line instead of -- building lot line
3 instead of at the building. And so it's
4 causing a hardship for us in terms of
5 losing some of the square feet we want to
6 use to develop.

7 Also, it's one of those
8 brownstone blocks that has a lot of those
9 circular references. And while our
10 architect did a great job of putting on
11 the top floors, we would love to have more
12 of it -- more of it on the lower floors.
13 And what's in the ZQA, to allow for within
14 12 inches, one foot, to allow a little
15 more creativity there is one of the things
16 that is going to enable us to think more
17 creatively if that goes through.

18 We also wanted to -- I think
19 actually, those are the major ones.

20 Other ones though, that we're
21 looking at, another project where we are
22 going to be a joint venture, and it's an
23 extension of a 202, which is something I
24 think you'll be seeing more of, where
25 you -- we are doing a building that's

Proceedings

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2 going to be adjacent to an existing 202.
3 Aging in place is very important. So the
4 provisions that allow for non-residential
5 uses on higher floors are ones that are
6 very important for us. And --

7 (Bell rung.)

8 Mr. MARCUS: -- we are very
9 pleased to allow it.

10 I did want to just quickly
11 mention, though, two other features that
12 are important for Fifth Avenue Committee.
13 One is one you heard about earlier from
14 NHD, that having some of the units at
15 30 percent of median is going to be very
16 important. Section 8 is the only way,
17 because the rents don't afford maintenance
18 and operating costs. And when we're doing
19 a hundred percent affordable we really
20 can't afford to have rents at 30 percent
21 and subsidize the maintenance and
22 operating costs. When you have mixed
23 income things that are 75, 80 percent or
24 70 percent affordable, it allows -- and
25 the market, excuse me, the market, it

Proceedings

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2 enables a little more of that cost that
3 you can get to rent below 30 percent of
4 median.

5 We also wanted -- you heard from
6 Gale Brewer earlier, as well as the
7 community board, that's very important for
8 us, is even though we really admire how
9 much the Mayor's office has put into
10 anti-displacement efforts, we really think
11 something in the zoning for
12 anti-displacement is needed as well.
13 We've seen extensively in north Park Slope
14 substantial loss of rent stabilized
15 housing as a result of harassment.

16 THE CHAIRPERSON: Thank you.

17 Thank you, Mr. Marcus.

18 Any questions for Mr. Marcus?

19 (No response.)

20 THE CHAIRPERSON: Thank you.

21 MR. MARCUS: Thank you.

22 THE CHAIRPERSON: Okay, the next
23 four speakers are Victoria Hillstrom,
24 Alyssa Bishop, Elizabeth Ely and Harry
25 Schwartz.

Proceedings

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And you are?

MS. HILLSTROM: Victoria Hillstrom.

THE CHAIRPERSON: Welcome.

MS. HILLSTROM: I don't know if you got it.

COMMR. DE LA UZ: Sure.

THE CHAIRPERSON: Sure, we'll take it.

MS. HILLSTROM: So that you can follow my story.

THE CHAIRPERSON: Thank you.

MS. HILLSTROM: My name is victoria Hillstrom. I'm here to represent Loft Law tenants. Our address is 385 Greenwich, AKA 71 North Moore. We've been a loft since 1982; we're across the street from the Greenwich Hotel.

Our lofts are everything in the photos except for the 1,090 square feet in the ground floor of 385 Greenwich. Our lofts are both buildings combined above the ground floor which include the attached single-car garage and cellar in

Proceedings

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2 the photo. That acts as our second fire
3 exit in case of a fire. That is now
4 obstructed with a partial partition for an
5 illegal bar. It turns out that the
6 illegal bar is a -- our landlord masked as
7 a tenant doing construction next to major
8 development who hotwired the buildings
9 three times, caused our ceilings to fall
10 in twice, removed our fire exit and
11 started a fire. At the same time, the
12 same tenant was evacuated at 287 Broadway,
13 next to 57 Reade.

14 After our landlord illegally
15 subdivided our electrical, ran electrical
16 up in the elevator shaft of 287 Broadway,
17 failing to flame retard the vent in a
18 residential building, this is now the same
19 tenant in nearly a dozen buildings, all
20 next to major development over the
21 rebuilding of lower manhattan after 9/11,
22 where there are three building with big
23 red X's that are no longer safe to enter,
24 who had three accidents, three fires, all
25 three buildings sit not so mysteriously

Proceedings

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2 vacant, all within three years in A
3 pattern of fraud that began with three
4 buildings in 2005, just after the Liberty
5 Bond money fell into place, that now
6 finally extends to 29 buildings in a
7 \$200 million fraud scheme for our landlord
8 to sell 26 buildings vacant, boasting a
9 retail component, whether the retail
10 component was legal or complied with code.

11 My question is very simple.

12 Where is this affordable housing meant to
13 go? Our lofts, we're across from the
14 Greenwich Hotel someone approved plans for
15 the hotel to go down three floors instead
16 of one, who hit the water line, failing to
17 survey the surrounding landmarks.

18 385 Greenwich dates back to 1805, 71 North
19 Moore dates back to 1816. The BD Hotel
20 was built on landfill by some of the most
21 relevant journeymen in the country, in my
22 opinion. The 385 portions of these two
23 buildings combined above the ground floor
24 was damaged. Our landlord was negligent
25 to repair this, caused our 28 windows to

Proceedings

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2 break, one by one. Our landlord was
3 negligent to repair them.

4 Four months after the City
5 issued our landlord an illegal certificate
6 of occupancy faultily claiming our lots
7 since 1982 were permanently vacant, these
8 kids in this illegal bar, Smith & Mills,
9 started a fire. The fire would have
10 caused the City to investigate. The City
11 would have found that the bar was
12 obstructing our second fire exit for 71
13 North Moore with a partial partition. The
14 Greenwich Hotel had broken our windows,
15 obstructing our fire escapes for
16 385 Greenwich, leaving us no way out in
17 case of fire, when this illegal bar
18 finally started a fire.

19 Two weeks later, we were sued
20 when the police tipped them off. I had
21 written Mayor Bloomberg over the fire,
22 accusing me of being Bruce Ratner's
23 sister. I wrote the Mayor because his
24 daughter was my next door neighbor at
25 62 Beach. We were in danger. We were

Proceedings

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2 told by Noelle Jefferson, an executive
3 member of Community Board 1, who worked
4 for the Mayor's office, to write the
5 Mayor, and Ray Kelly, it turns out BD
6 Hotel's lawyer, made up this story on us,
7 trying to put us in breach of lease, to
8 turn our lofts into a SoHo house.

9 We caught them lying to a judge.
10 Three supreme court judges ruled in our
11 favor. They were forced to describe the
12 premises, the egress and the fire hazards
13 to the judge too many times to count a
14 traverse. They failed to serve us notice
15 on any court. They sent us a marshal
16 without a warrant, eight men threatening
17 to get physical.

18 (Bell rung.)

19 MS. HILLSTROM: A socialites.
20 I'd never seen my home or anything.

21 THE CHAIRPERSON: Ms. Hillstrom,
22 thanks. Your four minutes are up.

23 MS. HILLSTROM: Thank you.

24 THE CHAIRPERSON: Are you
25 covered by the Loft Law?

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MS. HILLSTROM: By the grace of God, we are covered by fraud, and we are --

THE CHAIRPERSON: Are you a multiple dwelling?

MS. HILLSTROM: We are an inter-multiple dwelling, that's exactly correct.

THE CHAIRPERSON: Well, I would suggest you go to the Loft Board.

MS. HILLSTROM: Well, very interestingly, and thank you for saying so, and it was just the end.

Once the case was dismissed against us, we went to Deputy Mayor Corcoran, asking him why in God's name we stood falsely accused of fake Department of Building complaints. And we wrote an eight-page complaint to Landmark Preservation. They caused them to repair the damage. The City claims the damage are MCIs. And now it's tied up in lawsuits.

So the reason that I'm really

Proceedings

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2 here is simply to say that it disturbs me
3 that this plan does not speak to
4 preservation.

5 THE CHAIRPERSON: I think this
6 plan, because you're covered by the Loft
7 Law you should go to the Loft Board.

8 MS. HILLSTROM: We have. We
9 have and we are.

10 THE CHAIRPERSON: Okay.

11 MS. HILLSTROM: We just wanted
12 to speak to this because we feel that we
13 are very fortunate. We don't feel that
14 tenants in East -- wherever it is and
15 Harlem -- we've spent a quarter of a
16 million dollars fighting for our homes.

17 THE CHAIRPERSON: Thank you.

18 MS. HILLSTROM: So we just want
19 to speak to the notion that when these
20 plans go through, these are people's
21 homes. And it shouldn't be that we caught
22 the City falsifying the records 129 times
23 to date. So we think it's something
24 important to say.

25 Somebody approved these plans

Proceedings

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2 for the rebuilding of lower Manhattan
3 after 9/11. We've been fighting every
4 single commissioner in the City.

5 THE CHAIRPERSON: Thank you.

6 COMMR. DE LA UZ: Thank you.

7 MS. HILLSTROM: Thank you.

8 THE CHAIRPERSON: The next
9 speaker is Alyssa Bishop. Ms. Bishop?

10 (No response.)

11 THE CHAIRPERSON: Elizabeth Ely.

12 (No response.)

13 THE CHAIRPERSON: Harry
14 Schwartz.

15 (No response.)

16 THE CHAIRPERSON: Barry
17 Weinberg.

18 MR. WEINBERG: I'll try really
19 hard to stick to my four minutes.

20 I'm Barry Weinberg. I am a
21 resident of Hamilton Heights and a member
22 of Manhattan Community Board 9's Housing,
23 Zoning and Land Use Committee. I speak
24 only for myself today, but many of my
25 points are taken from Community Boards 9's

Proceedings

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2 resolution to disapprove of the ZQA and
3 MIH proposals. I helped draft that
4 resolution, and I am here tonight to
5 really urge the Commission to read that
6 resolution from the community boards
7 across the City, that contain reasonable
8 and important suggestions and feedback on
9 how to improve those two proposals so that
10 they are acceptable to the vast majority
11 of New Yorkers and will impact their lives
12 in a positive way these recommended
13 changes should be made to the zoning text
14 proposal hopefully before it is submitted
15 to the City Council.

16 I think it's safe to say that
17 almost all of us living in the City,
18 including those serving on community
19 boards, support the goals of permanent
20 affordable housing affordable, flexible
21 and functional senior living facilities,
22 and varied, nuanced and appropriate zoning
23 guidelines that provide for buildings that
24 enliven pedestrian experiences, while
25 meeting the commercial and residential

Proceedings

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2 needs of our City.

3 So why then has there been so
4 much opposition from the public and the
5 community Board on both of these two
6 proposals and the problem lies because the
7 proposals as they stand are not -- are not
8 acceptable, and they will have
9 ramifications for years and will be
10 difficult to change. These are the
11 toolkits that you hand to community boards
12 and to all those active in the land use
13 and review process throughout the City.
14 And it's important that when we're making
15 these tools once in a generation, we do it
16 properly and correctly.

17 I want to speak first to MIH. I
18 speak for my own experience, representing
19 the community of West Harlem. And
20 according to data from the 2012 American
21 Community Survey over a quarter of
22 households in our district have combined
23 income and benefits received of \$15,000 a
24 year or less. And close to half have
25 combined income and benefits of less than

Proceedings

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2 \$35,000 a year. It is our strong opinion
3 that the income bands and weights targeted
4 in the MIH proposal regarding the AMI are
5 simply not going to make residences
6 affordable for the vast majority of those
7 in our district, while still opening them
8 up to increased development. We are not
9 anti-development, but we are pro
10 development that allows our community to
11 stay strong and to grow and welcome new
12 members while retaining those who have
13 really, quite honestly, toughed it out in
14 our community for the past 40, 50 years.
15 And I think that that's pretty simple.
16 I'm sure you've heard a lot about that
17 today.

18 But I want to then also just
19 briefly touch on affordable senior housing
20 and simply the point that we support
21 affordable senior housing, but we think it
22 only prudent that, much as inclusionary
23 housing will be permanent, the
24 affordability requirements for senior
25 housing should also be permanent because

Proceedings

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2 the FAR and height limitation exceptions
3 will also be permanent. And so it does
4 not make sense for us to have only an
5 initial period of 30 years of
6 affordability.

7 Finally, regarding ZQA, which is
8 where many of our serious difficulties
9 with specific aspects of these proposals
10 lie, we think that ZQA has a number of
11 really bad proposals that do not serve
12 any -- any good purpose to the community
13 and really could be excised without
14 meaningfully impacting the goals of either
15 MIH or ZQA. One of these is the provision
16 for rear yard -- eliminating rear yard
17 setbacks in R6, R7, R8, R9 and R10 zones
18 in section 23-663, which were formerly
19 required in Paragraph A. These setbacks
20 are important for properties abutting lots
21 which have rear yards. We have in
22 Community District 9 this type of zoning
23 in mid-block, where there are townhomes
24 with rear yards, and I want to just share
25 a story of something that I personally

Proceedings

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2 dealt with as a community board member
3 facing the public.

4 There was construction of a --
5 that passed the LPC of an addition for a
6 fire stair to the back of a townhome near
7 the City College. The townhomes were
8 owned by City College. It's being turned
9 into an academic center. This was allowed
10 by, I believe, both the BSA and the LPC to
11 have a shear six-story wall at the lot
12 line completely devastating the next door
13 garden of the long-time homeowner who'd
14 been there for 30 years, had been part of
15 a safety patrol on the block that kept
16 City College students safe, and that had
17 called the City repeatedly about the
18 dilapidated eyesore that was the City
19 college owned property --

20 (Bell rung.)

21 MR. WEINBERG: -- that they did
22 not maintain.

23 So we on community boards are
24 going to be first in the line of fire when
25 something like that happens, when there is

Proceedings

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2 a rear lot yard built to the -- when there
3 is a rear wall built to the lot line, when
4 there are sliver buildings going up in
5 mid-blocks. And it's worth it --

6 THE CHAIRPERSON: Thank you.
7 Thank you, Mr. Weinberg.

8 MR. WEINBERG: -- to do it right
9 now.

10 THE CHAIRPERSON: Thank you,
11 Mr. Weinberg.

12 COMMR. DE LA UZ: Thank you.

13 THE CHAIRPERSON: Questions for
14 Mr. Weinberg?

15 (No response.)

16 COMMR. DE LA UZ: Thank you.

17 THE CHAIRPERSON: Thank you.

18 Next speaker, Page Cowley.

19 Welcome, Ms. Cowley.

20 MS. COWLEY: Thank you very
21 much. I am back because I want you to
22 know this is the hottest ticket in town,
23 and when I got my number I wasn't going to
24 give it up for anything.

25 (Laughter.)

Proceedings

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2 MS. COWLEY: I even went to a
3 land use meeting in between just to get
4 revved up.

5 THE CHAIRPERSON: Maybe you
6 could have sold it, Ms. Cowley. You never
7 know.

8 MS. COWLEY: Anyway, my name is
9 Page Cowley. I'm an architect. I'm the
10 Co-Chair of the Land Use Committee for
11 Community Board 7. And I'm here to
12 represent our full Community Board. And,
13 first of all, I want to thank City
14 Planning, because during the time of this
15 project, these text amendments were rolled
16 out, you guys and your Commissioner
17 Weisbrod, your staff has come to at least
18 three or four meetings to help us
19 understand the ramifications, your goals
20 and how to actually get this done.
21 Because, believe it or not, even though we
22 said no to both MIH and the ZQA, we really
23 do want affordable housing. And
24 unfortunately, land -- the Upper West Side
25 really doesn't have the space anymore to

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have it.

In fact, your staff is aware that we're in the process now of having to find affordable housing that has been shunted out of developments that were actually earmarked for affordable housing.

So tonight the message that I'm to deliver to you from our chair is one simple word. Neighborhoods matter. You have our detailed breakdown of our resolution. But there are four areas underneath this that I think -- underneath the heading Text Amendment we can underscore. And from the testimony I heard up until about three-thirty this afternoon, I feel emboldened by other City neighborhoods to reinforce this.

The first one is for MIH. It's great; we all want to see this happen. But the one thing that really concerns us is that there's a flawed -- it has a huge flaw. And that is, with all the promises and goals there's no real administrative process or procedure that has been

Proceedings

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2 outlined that would help us understand how
3 an application comes, except for upzoning.
4 And we're aware that once you let one cow
5 out of the barn, they all follow. So it's
6 a question of the process, the sequence of
7 how submittals are made, the approvals; if
8 and when certain applications can come
9 before the community board.

10 And then of course if there are
11 problems and then there's a hardship. We
12 do see a lot of the hardship cases that
13 come before us for 7411 and other special
14 hardships but those hardship
15 qualifications really can't apply; those
16 findings really can no longer apply to
17 housing. And so the P.S. to this whole
18 administrative process is that we don't
19 believe that the BSA has the expertise or
20 is equipped to decide on matters about
21 housing. That is something that really
22 requires specialist knowledge, and it's
23 not based on, frankly, the bottom line and
24 the loss of income, because how can you
25 ever imagine that.

Proceedings

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2 The second one, of course,
3 you've heard all day, and I'm just going
4 to say it again, it applies to both MIH
5 and the ZQA, is the one size fits all.
6 When we first saw this, our committees had
7 a terrible time putting our arms around it
8 because we thought how could we be making
9 a decision about our neighborhood that is
10 going to affect the Rockaways, Brooklyn
11 Heights and everywhere else. We just
12 don't know enough about these other
13 communities to actually step in and say,
14 fine, everybody can take this kind of
15 upzoning.

16 So we wanted to know more, and
17 your staff has heard this ad nauseam,
18 about the triggering for MIH and, frankly,
19 the conditions under which this would
20 apply. We see this because we know that
21 the developers are working hard to provide
22 growth for our City. But we have
23 transferred air rights, no transparency in
24 terms of lot mergers and zoning, and our
25 neighborhoods are really changing. Not

Proceedings

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2 for the better right now because they
3 don't consider environmental factors.

4 And that's point number three,
5 and that has to do with we felt, for the
6 ZQA, the Environmental Impact Study was
7 really environmental impact light. It
8 found that there were no adverse effects.
9 But we've seen just with regular
10 development in our district that there's
11 an impact on schools, transportation.
12 Even pedestrians are now queuing up to
13 cross at crosswalks because there's not
14 enough time to move people, trucks, buses,
15 cycles, everything converging in our
16 streets. So we felt --

17 (Bell rung.)

18 MS. COWLEY: -- that these were
19 the three most important items that you
20 should reconsider in tonight's or in the
21 debate going forward.

22 Thank you very much.

23 THE CHAIRPERSON: Thank you,
24 Ms. Cowley.

25 Any questions for Ms. Cowley?

1 Proceedings

2 Thank you very much.

3 Oh, a question from Ms. Levin.

4 COMMR. LEVIN: I'd just like to
5 acknowledge that it took until this point
6 in this day that we officially heard from
7 a community board, despite the fact, I
8 will say they all wrote to us very
9 passionately and very thoughtfully. It's
10 clear that across the City there has been
11 careful consideration of this, but I
12 wanted to thank you for showing up on
13 behalf of a community board.

14 MS. COWLEY: They would all be
15 here, but --

16 COMMR. LEVIN: They would, but
17 they've been through an exhaustive
18 process, and they wrote to us very well.

19 MS. COWLEY: Thank you so much
20 I'll send that message, because they're 50
21 of the most devoted people that I've ever
22 had the pleasure of working with.

23 Thank you all.

24 THE CHAIRPERSON: Thank you very
25 much.

Proceedings

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2 And, speaking of one of them,
3 Mark Diller.

4 MS. COWLEY: I'm not alone, by
5 the way.

6 THE CHAIRPERSON: Good evening,
7 Mr. Diller.

8 MR. DILLER: Thank you very
9 much. My name is Mark Diller, and I am a
10 member of Community Board 7. I'm Chair
11 Emeritus, which, as a title, is one that
12 my mother actually uses.

13 (Laughter.)

14 MR. DILLER: And pinch hitting
15 for our chair, who it takes at least two
16 of us to sub for. So thank you for the
17 opportunity to be heard on this.

18 I would be remiss if I didn't
19 open my remarks with a concept of NIMBY,
20 because we have been accused as community
21 boards of having our what I believe to be
22 very careful analysis dismissed as simply
23 not wanting it in our backyard. I can't
24 speak to the other 58 community boards,
25 but I am proud to say that 21 percent of

Proceedings

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2 the supportive and homeless shelter
3 housing in the Borough of Manhattan is in
4 our board. And we are very proud to
5 partner with the agencies when called upon
6 in a collaborative way, in a positive way
7 to work together to make sure that we do
8 that. And there's a meeting tomorrow
9 night to do just that. So the accusation
10 that it's NIMBY is, at best, unfounded.

11 Picking up a couple of the more
12 important issues that are, I hope, well
13 addressed in our two resolutions, one on
14 each of the two matters before you, the
15 theme that my colleague, Page, just
16 mentioned has some permutations, the idea
17 that neighborhoods matter can be best
18 understood by saying that the goal of
19 affordable housing is to make our
20 communities welcoming of additional folks
21 who can then join in the community. So
22 the character of the community which we
23 are trying to integrate more folks into is
24 as important as making it affordable to
25 them.

Proceedings

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2 If we homogenize all of our
3 communities, and this is something that
4 we've been fighting about with the
5 commercial aspects of it and with respect
6 to the housing aspects of it, so that the
7 Upper West Side doesn't become the
8 greatest outdoor suburban shopping mall,
9 is also one of those things that we want
10 to make sure that when we welcome folks
11 into our community, that they're in our
12 community, that they're part of us, and we
13 want that to happen. That's why we see
14 the need for retaining the narrow street
15 distinctions and the opposition to the
16 Sliver Law and the need for backyards. If
17 there's one thing that's emblematic of the
18 Upper West Side it's the donuts, and we
19 want to preserve that.

20 I join with many, many other
21 folks in saying that because we are not
22 going to run out of seniors, we shouldn't
23 be running out of senior affordable
24 housing. I'm knocking on that door
25 myself, so please, keep that to be

Proceedings

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2 permanently affordable. There is a
3 tipping point argument with respect to MIH
4 that is very crucial.

5 There is an opportunity where
6 someone who has a mostly affordable
7 building with the additional height and
8 volume that is permitted under this
9 proposal could actually get to that point
10 where it's worth his or her while to tear
11 down the building and build something
12 else. And going from a 90 percent
13 affordable building to something that's a
14 little bit bigger but only 20 or 30 or 40
15 percent affordable is a net loss.

16 We were told by the wonderful
17 staff, who keeps coming to our meetings
18 and taking our abuse and actually
19 answering our questions that 421-a solves
20 this problem. I'm not certain that's
21 correct. But 421-a has to be renewed, and
22 it has to be renewed in Albany and we all
23 know what that's about. So if nothing
24 else, we need to airlift the provisions of
25 421-a that are claimed to solve this

Proceedings

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2 problem and incorporate them into the
3 zoning resolution, because there at least
4 they're permanent, we know what they say,
5 and we can rely on them.

6 I echo the comments about the
7 appropriate place for hardship
8 applications cannot be the BSA. I'm sorry
9 to say that my recommendation is to put
10 them in HPD where people actually
11 understand the value.

12 (Laughter.)

13 MR. DILLER: Just in case you
14 didn't have enough to do. And --

15 THE CHAIRPERSON: HPD has rarely
16 been so popular.

17 MR. DILLER: -- I've darkened
18 her door before.

19 The final thought I want to
20 leave you with is the Jack Nicholson
21 quote, is this: "What if this is all we
22 get, what if this is as good as it gets?"

23 (Bell rung.)

24 MR. DILLER: And I'll have to
25 leave it there. Accept my --

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THE CHAIRPERSON: No, he's --

COMMR. DE LA US: What happens
now?

MR. DILLER: This is -- this has
been sold to us as a floor. But if I'm a
developer, and with the developer's
lawyers that they -- you know, my
colleagues at the bar, who are incredibly
good at this, are going to come in and say
I've been given a matrix, I'm picking box
number two. There may be a conversation
with the nice folks at City Planning about
nah, you really need box number one.

But what we really need is to
make sure that the affordable housing goes
to people hopefully with families who have
children who will need to go to public
school and use, please, the public
transit, and that the fire department can
actually get there, and if the end of the
equation is we get the affordable housing
and then where are we, then that's the
problem.

Kudos, by the way, to HPD staff

Proceedings

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2 as well, who has been our partner not just
3 on this matter but others as well. And
4 thanks to the staff of DCP.

5 Thank you so much.

6 The CHAIRPERSON: And I just do
7 want to, because we got a lot of very
8 positive comments about the DCP staff, but
9 the HPD staff has been our partners in
10 this every step of the way, so --

11 MR. DILLER: Yes, indeed. Thank
12 you.

13 THE CHAIRPERSON: They've been
14 very helpful. Thank you.

15 Is there anyone else who wishes
16 to be heard on this matter?

17 (No response.)

18 THE CHAIRPERSON: And hearing
19 none, I will say the record is going to be
20 held open for ten days for comments,
21 particularly on the draft EIS. Cots have
22 been set up upstairs.

23 I do want to thank -- I do want
24 to thank all the Commissioners and staff
25 for really a very --

1 Proceedings

2 (Applause.)

3 THE CHAIRPERSON: -- a very long
4 day, and I do want to just acknowledge, I
5 think all of you have met Hope Knight, who
6 has sat through all of this and now is
7 officially a member of this commission.

8 (Applause.)

9 THE CHAIRPERSON: Thank you.
10 Actually appointed by the Mayor today,
11 after being approved by the Council.

12 And I have to say it's been a
13 very long and grueling day. It's been, I
14 don't know, 13 hours since -- the longest
15 continuous hearing that the City Planning
16 has ever had, but I really do want to
17 thank everyone for what I actually thought
18 was a really interesting high-minded,
19 thoughtful hearing from all sides.

20 So thank you very much.

21 And I particularly want to thank
22 our partner, HPD, and Vicki Been
23 particularly --

24 (Applause.)

25 THE CHAIRPERSON: -- for

Proceedings

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really -- for really sitting through this,
which was really unnecessary, but I really
appreciate it.

(Applause.)

THE CHAIRPERSON: Thank you,
thank you all.

Let me just say I will entertain
a motion to adjourn.

COMMR. EADDY: So moved.

THE CHAIRPERSON: We're
adjourned.

(Whereupon, at 10:00 p.m. the
hearing concluded.)

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CERTIFICATE

STATE OF NEW YORK) ss.:

We, NICOLE ELLIS and KARI L. REED, Shorthand Reporters and Notaries Public within and for the State of New York, do hereby certify:

We reported the foregoing hearing, and that the within transcript is a true record of such proceedings, to the best of our abilities.

We further certify that I we not related, by blood or marriage, to any of the parties in this matter and that we are in no way interested in the outcome of this matter.

IN WITNESS WHEREOF, we have hereunto set my hand this 23rd day of December 2015.

NICOLE ELLIS

KARI L. REED

< Dates >

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