

NO on
ZONING FOR
QUALITY & AFFORDABILITY
TEXT AMENDMENT

c/o GVSHP 232 East 11th Street New York, NY 10003

June 9, 2015

Dear Community Board:

We are a coalition of neighborhood, civic, preservation, and housing groups with very serious concerns about the proposed 'Zoning for Quality and Affordability' citywide text amendment. We do not believe that the current proposal should be approved.

The reasons for our concern are varied, but in short, we do not believe that the current proposal will meet either of its purported goals of increasing the quality or the affordability of housing in New York City. What is clear, however, is that the proposal will result in larger and taller developments in residential neighborhoods throughout the city, with the resultant loss of light, air, scale, and sense of place, but with little or no public benefit to compensate for these losses.

Our concerns include:

- **One-size-fits-all approach:** The plan would change rules governing the allowable scale of development in neighborhoods throughout the city, with no particular consideration given to the specific context of any neighborhood or area, or the impact the proposed changes would have upon them. For example, in some areas, it would allow for buildings of double the height or more of their surroundings.
- **The changes would be substantial:** In each of the affected districts, the plan would increase the maximum allowable height by a minimum of 10%, and in the case of R7-A and R7-A equivalent districts such as C1-6A, C2-6A, C4-4A, and C4-5A districts, by over 31%. In some districts the allowable height increase would be up to fifty feet, and in by far most affected districts the increase in allowable height would be 20% or more.
- **Changes would be retroactive and prospective:** The proposed new height limits would not only apply to any new zoning district affected by the change, but to every existing district as well.
- **Non-contextual districts would be affected too:** The proposed increased height limits would apply to "Quality Housing" developments in medium and high density non-contextual districts as well.

- **Undoing years of community planning and compromise:** The plan would undo years, or in some cases decades, of community planning, careful negotiations, and give-and-take which often involved allowing larger development in some areas in return for restrictions and limitations (which this plan would gut) in others.
- **Applies Largely to Market-Rate Developments:** Under the plan, in 85% of the contextual zones where height limits would be lifted, there is no inclusionary housing provision. Thus the proposed increased height limits would only apply to market-rate housing.
- **Does not increase affordability:** The plan does not require a single unit of affordable housing be built, and there is no evidence that it will result in any increase in the production of affordable housing over the current rate with the existing height limits. Developers cite bureaucracy, economies of scale, high land costs, and complications from integrating affordable and market-rate developments as reasons for not opting into the “inclusionary” program and choosing to include affordable units in their developments. Few if any cite height limits as the main reason or even as a factor in their decision as to whether or not to do so.
- **‘Affordable’ developments would be largely unaffordable:** The generous increases in allowable height of ‘affordable’ developments are not for 100% affordable developments or even 50% affordable; they are for developments which would contain 80% market-rate housing and just 20% ‘affordable’ units.
- **Senior housing bonus available to market-rate, non-senior housing:** Under the plan, developments which are as much as 90% market-rate housing would qualify for the very generous height limit increases offered for ‘senior affordable housing.’
- **Rear yards will disappear:** The plan would 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.

This is by no means an exhaustive list of all the concerns of all the parties signed to this letter, but does represent shared concerns; you may well be hearing from signers with additional concerns.

A citywide rezoning of this magnitude typically comes along once in a generation, and its effects will be with us for a very long time. The ‘Zoning for Quality and Affordability’ plan will have a particularly profound impact upon our neighborhoods and our city, and the developments which result from it will be permanent. For these reasons, and based upon the specific concerns we have outlined, we urge you not to approve the ‘Zoning for Quality and Affordability’ plan at this time.

Sincerely,



Henry Euler

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Art Loisaida Foundation/
9 BC Tompkins Square Block Association

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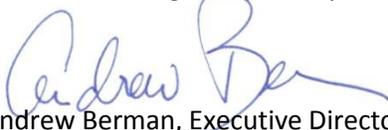
Arlene S. Harrington, President
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Bob Singleton, Executive Director
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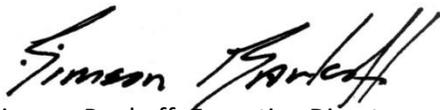
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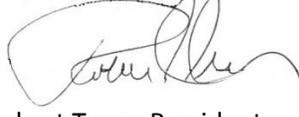
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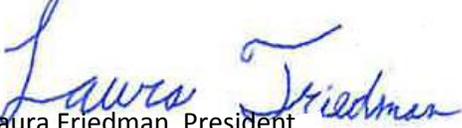
Vincent Lisi
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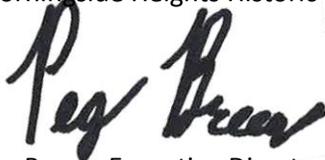
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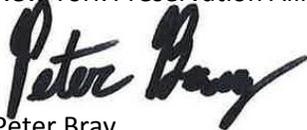
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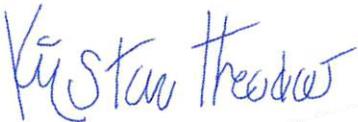
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