

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 shoehorning 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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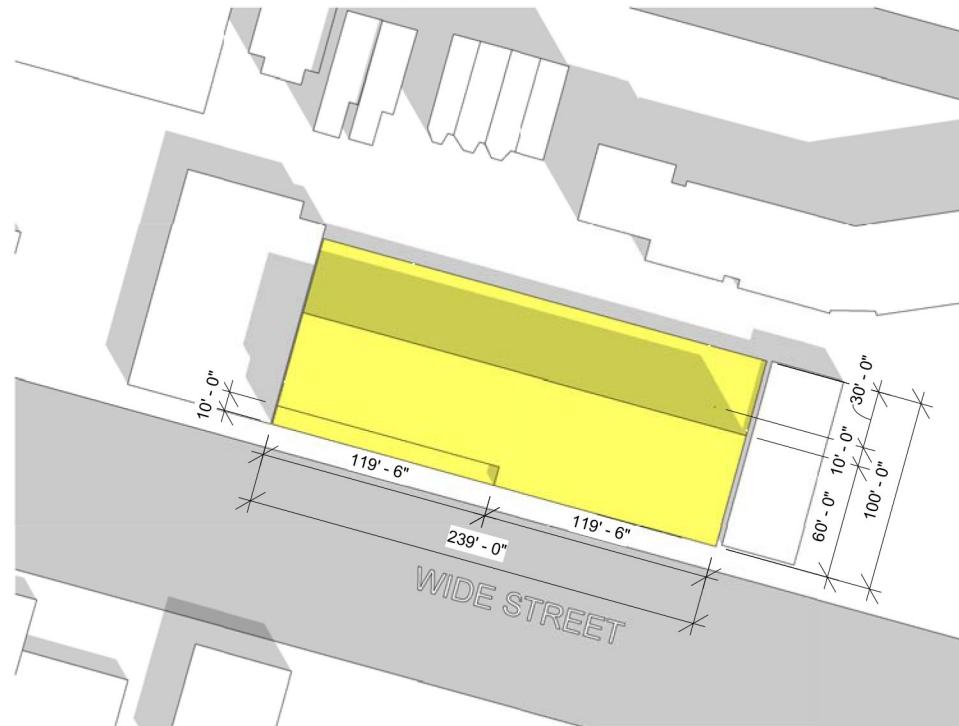
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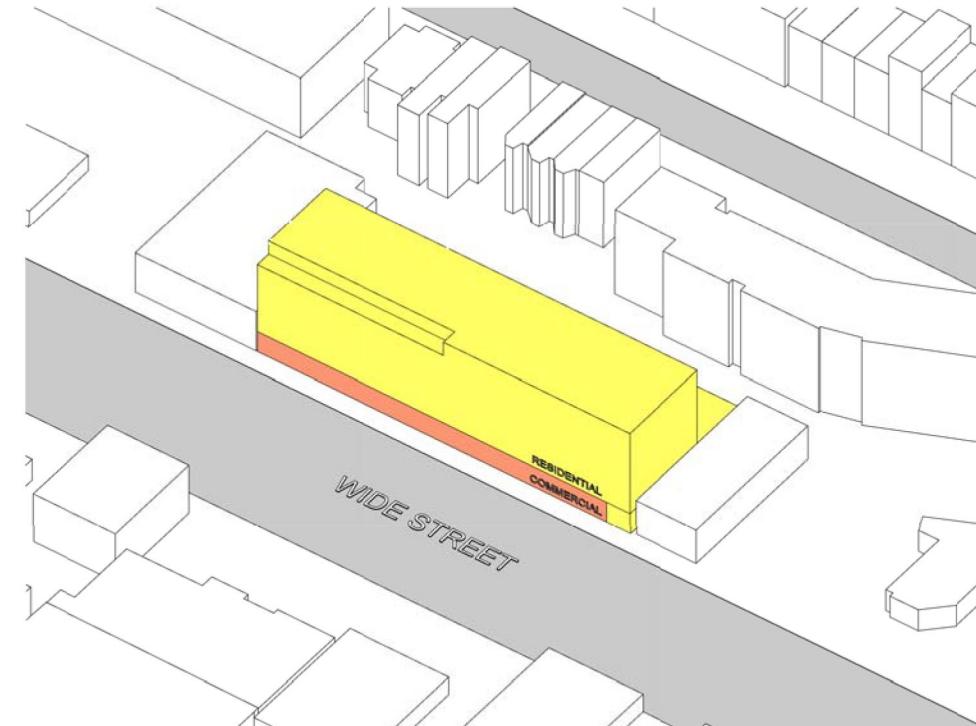
From our experience parking requirements for affordable housing are expensive, for all of us tax payers and make it harder for new developments to promote good urban design.

- 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



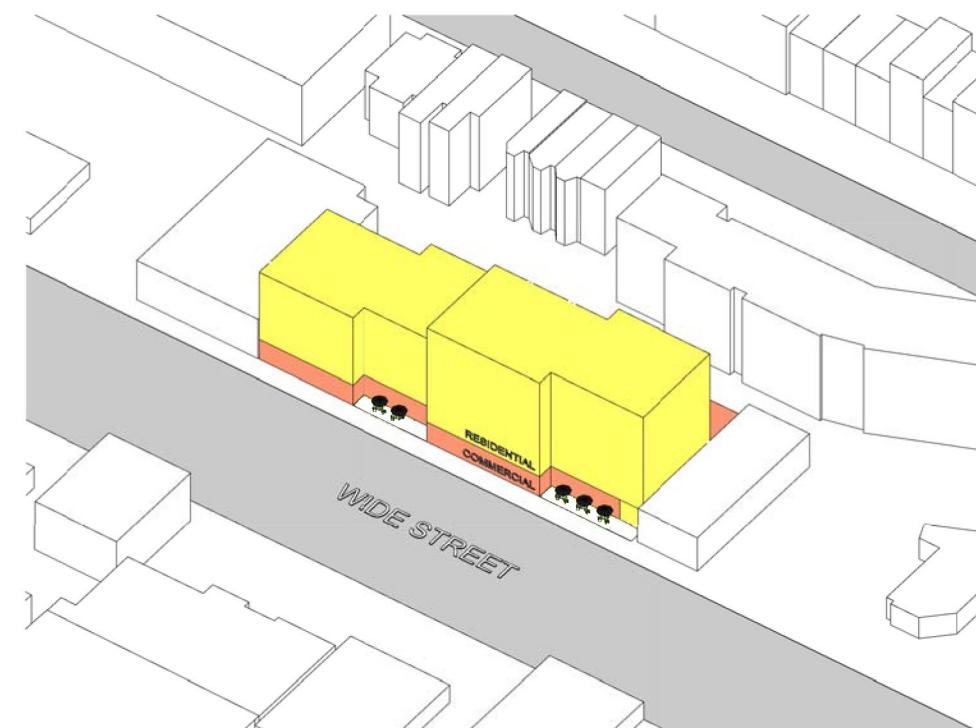
CURRENT ZONING MASSING



CURRENT ZONING PERSPECTIVE



PROPOSED ZONING PLAN



PROPOSED ZONING MASSING

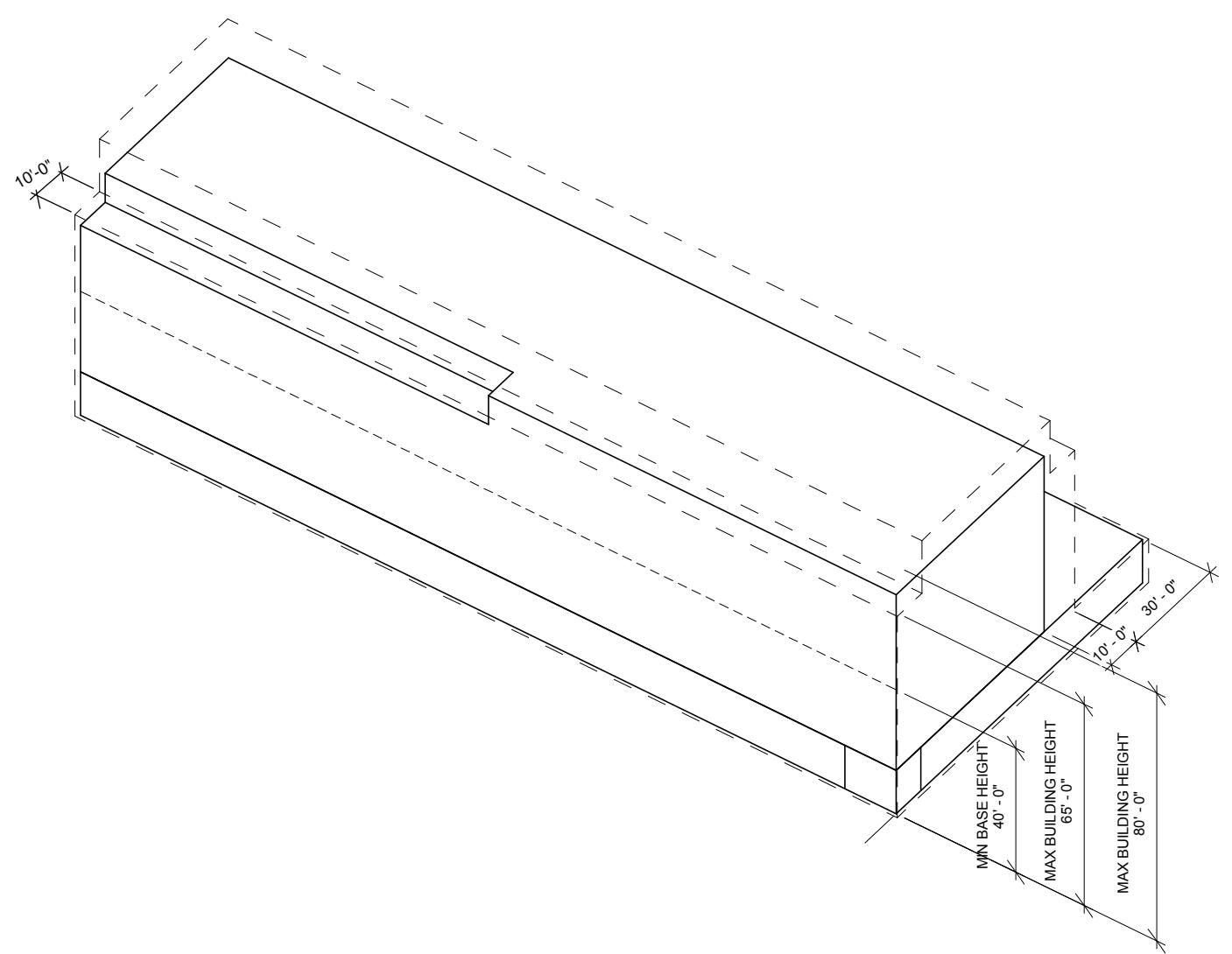


PROPOSED ZONING PERSPECTIVE

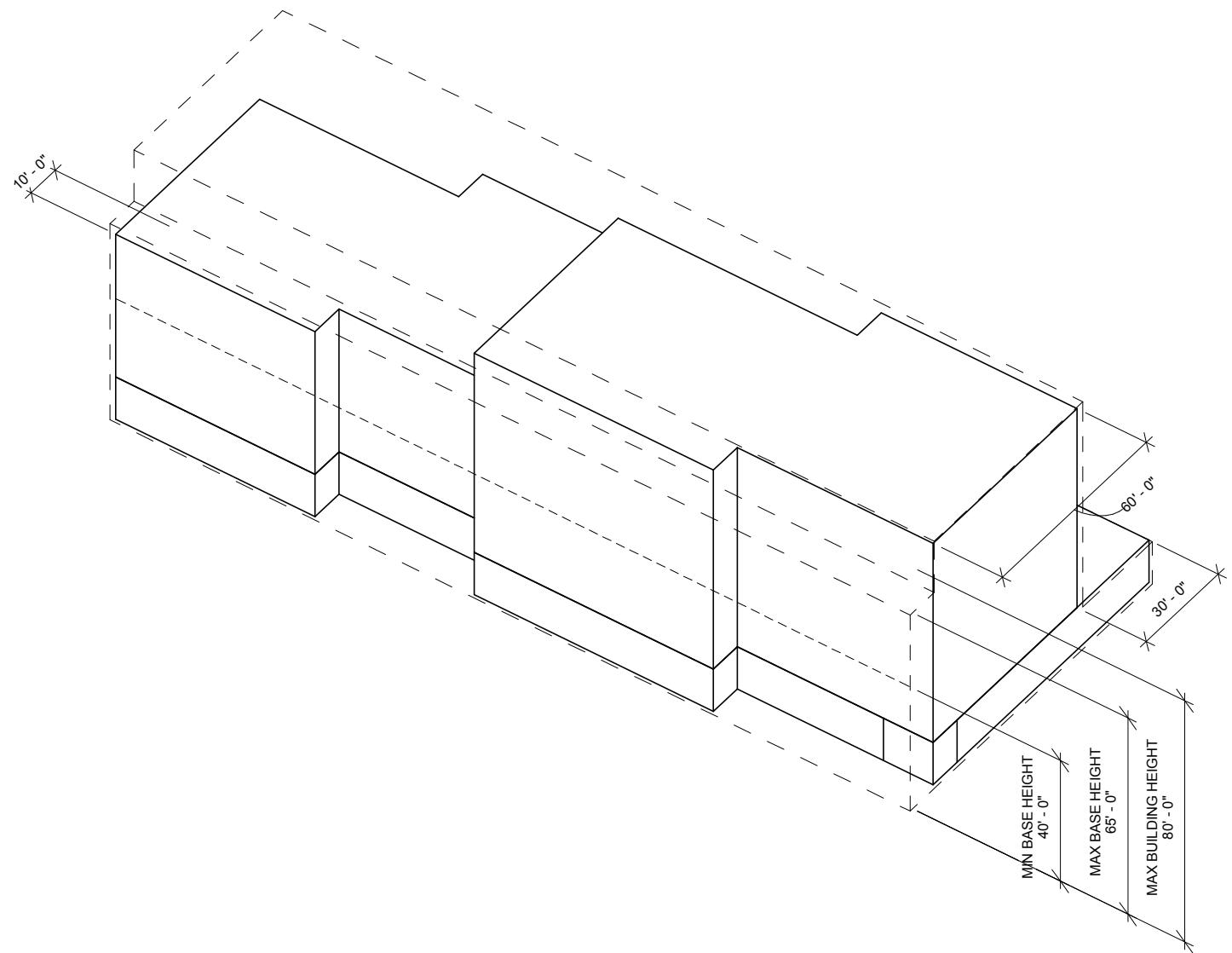
ZQA MASSING STUDY

ZQA MASSING STUDY

10/08/15



CURRENT ZONING ENVELOPE DIAGRAM



PROPOSED ZONING ENVELOPE DIAGRAM