



Oral Testimony  
of Sarah Watson, Deputy Director at  
Citizens Housing & Planning Council, for the  
City Planning Commission  
on the Zoning for Quality and Affordability text amendment

December 16, 2015

My name is Sarah Watson and I'm the Deputy Director of CHPC.

I am here to testify strongly in favor of the Zoning for Quality and Affordability text amendment based on a couple of studies that we have worked on.

I am the co-author of the Building Envelope Conundrum study that studied the building envelope issues that this text change seeks to address.

We had heard from many housing practitioners on our board who said that in recent years they were facing the difficult scenario of designing and developing residential buildings with **less apartments** that zoning actually permits because of the rules that set the three dimensions of a new building in a contextual district. At a time when affordable housing is so desperately needed they were very worried about this.

We wanted test this issue so we did a case study of 17 recent projects submitted by some architects on our board that included some affordable housing in them. We found that 8 out of the 17 projects were unable to build all of their permitted floor area because of their maximum dimensions were hit first. Out of these 8 projects, over 56,000 sq ft of potential square footage for affordable apartments went unbuilt that was allowed under the current floor area rules in zoning.

We were very interested in why this was happening and looked back at the assumptions made when the dimensions were originally drawn up in the 1980s.

We found that things have changed a lot for residential construction since then and the assumptions no longer hold:

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- They were based on regular, rectangular lots – of which we have less and less.
- They were based on construction material used then, like poured in place concrete rather than newer systems today like modular and block and plank that favor different dimensions.
- Height limits were based on lower floor to floor heights for apartments than we accept today.
- And they did not take into account how much we would rely on floor area bonuses and deductions as key public policy tool, especially for the development of additional affordable housing. The dimensions were set thinking that there would still be flexibility in the envelope after the floor area was maximized.

Because of our findings, we are strongly in favor of the reform of the building envelope dimensions as part of this text change.

We believe the envelope changes to some building heights, courts, setbacks, rear yards and lot coverage will make it possible to build on irregular shaped lots.

They will facilitate newer cost-effective construction systems such as modular construction – which need higher floor to floor heights – and block and plank construction that favors different depths of a building.

They will allow us to prioritize the quality of apartments with higher ceilings and more efficient layouts that are not being squeezed into an outdated envelope.

And these changes – especially the height increases – will allow there to be space for floor area bonuses and deductions – so that they can actually have value as incentives.

Finally, in addition to our envelope study, our Making Room project has shown us how extensive the single population is and there's a serious lack of safe legal options for them. Therefore we are also fully in support of the changes proposed to take out a minimum unit size from zoning. And the change to the density calculations to allow there to be more of a range of unit sizes in a building – and more small units for singles.

To summarize, we are strongly in favor of this text change because it is crucial to update regulations to keep up with changing values and needs of the city - at a time when we face a desperate need for more affordable housing.