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December 16th, 2015

Mr Carl Weisbrod, Chair
City Planning Commission
Department of City Planning
120 Broadway 3 1st Floor
New York, NY 10271

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Dear Chair Weisbrod:

RE: Support for the Zoning for Quality and Affordability text change proposed by the Department of City Planning (N 160049 ZRY)

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I am writing on behalf of Citizens Housing & Planning Council (CHPC) to state our full support for the proposed *Zoning for Quality and Affordability* text change by the Department of City Planning, which is currently under public review.

Formed in 1937, CHPC is the oldest non-partisan civic organization focused on housing and urban planning in New York City. Our mission is to conduct research that helps us to better understand the housing and neighborhood needs of New York City - and to use this knowledge to shape practical policies that will contribute to the continual improvement of the city.

Because of this mission, we pay close attention to the impact of policy on the development of affordable housing. In recent years, we heard from many people in the affordable housing field that there were some parts of the Zoning Resolution, written decades ago, that had not kept up with the realities of residential construction today. As a result, it had become difficult to build well-designed apartments that would ease the extreme housing demand evidenced throughout the city.

We undertook a case study to examine this issue called the [The Building Envelope Conundrum](#). We studied seventeen recent affordable housing developments that were in *contextual districts* and we found that eight out of the seventeen buildings were unable to provide the number of apartments that were allowed to be built because of the rules

dictating the outer dimensions of a new building in *contextual districts* in the Zoning Resolution.

In investigating this issue, we found that there were many aspects of housing design, development and construction today that had changed, but the rules setting a new building's external dimensions had not. For example, the rules assumed that apartments would have only eight foot ceilings. However, current design standards now call for higher ceilings, and modern fire safety requirements, such as sprinkler systems, must be accommodated between floors. Raising the ceiling height without changing the height of a new building makes it difficult or impossible to fit all of the permitted apartments into a new building – and it compromises their quality as well as the quality of the ground floor spaces.

In light of our findings, we offer our full support for the Department of City Planning for the updates to the zoning resolution that form the Zoning for Quality and Affordability text amendment.

It is crucial for our city - that has limited land, huge demand for housing and rapidly rising prices - that housing development, and our goals for residential buildings, are not constrained by this technical issue. It is an act of good government to make sure that regulations keep up with emerging needs.

We understand that this text change is highly complex because the Zoning Resolution has become more and more detailed. We also understand that it might be controversial to discuss allowing some additional height, however modest, to new buildings.

However, the Zoning for Quality and Affordability text amendment maintains the core principles of *contextual zoning* - maximum floor area limits, and controls on the shape and size of a new building are still in place. A limit on the number of stories that a new building has been added. The changes are moderate and pragmatic. Historic Districts and Landmarks are unaffected.

However, these changes will:

- Make it easier to build the number of apartments permitted for that site;
- Allow buildings to accommodate the affordable housing required in the new Inclusionary Housing program;
- Facilitate new apartments to have appropriate ceiling heights and more efficient layouts, which will directly benefit those who will live there;
- Offer buildings more design variation to better reflect our historic and varied cityscape;

- Encourage developers to provide good quality retail corridors on the ground floor of residential buildings, which will directly benefit neighborhoods;
- Reduce the cost of construction of new buildings – thereby reducing rents - by facilitating new and efficient methods of construction such block and plank construction and modular construction;
- Open up more development sites for affordable housing on irregularly shaped lots, where it is currently impossible to apply the 1980s dimensions designed for a rectangular site.

In addition, while we also recognize that the reduction of parking requirements may raise concerns for neighborhoods, CHPC is in favor of the reduced parking requirements for new low income affordable and affordable senior apartments – housing that is urgently needed across the city. The text is worded carefully to make sure that the reductions are only for sites that have adequate access to transit and for low income populations that have demonstrated low car ownership levels. At CHPC, we would actually like to see the parking reductions in transit zones extended even further in a city with the best and most affordable public transportation in the world.

New York is projected to see dramatic increases in its elderly population by over 40% by 2030. Therefore, we also support the proposed amendments that will encourage the development of affordable senior housing.

We congratulate the Department of City Planning on these proposed amendments and are excited to support their efforts.

If you have any further questions about our testimony and/or the studies that we have undertaken please do not hesitate to contact us.

Sincerely,

A handwritten signature in blue ink that reads "Jerilyn Perine". The signature is fluid and cursive, with the first name "Jerilyn" written in a larger, more prominent script than the last name "Perine".

Jerilyn Perine
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