



JUMAANE D. WILLIAMS

**STATEMENT OF PUBLIC ADVOCATE JUMAANE D. WILLIAMS
TO THE NEW YORK CITY COUNCIL
SUB-COMMITTEE ON ZONING AND FRANCHISES
OCTOBER 21, 2024**

Good morning,

I am Jumaane D. Williams, the Public Advocate for the City of New York, and I want to thank Chair Riley and members of the Subcommittee on Zoning and Franchises for holding this hearing and allowing me the opportunity to make a statement.

Although I think the City of Yes for Housing Opportunity is the right lens well-intentioned, there are a number of challenges and potential negative impacts that include possible gentrification and the risk of this proposal not producing a lot of affordable housing units.

1. Gentrification Risk: When market rate housing units are built and rented at higher rates than current residents pay, property values can rise causing displacement of existing residents. Whether through the increase in property taxes for longtime residents forcing people to sell their homes, often to developers exacerbating the issue, or through a rise in rents as property values rise, if there are no preventative measures in place, vulnerable communities can be pushed out and it is critical to understand the long-term impacts and whether there are risks of racial and ethnic displacement. How does the City of Yes comply with [Local Law 78 of 2021](#)? How does the administration plan to address and mitigate heightened risk of displacement from tax increases or management companies taking advantage of an already overburdened rental market?
2. Lack of Affordable Units: While the plan emphasizes affordable housing, it does not guarantee any number of truly affordable units. Currently, this does not require Universal Affordability Preference (UAP) and lacks any regulatory system. Stronger enforcement mechanisms are needed to ensure deep affordability so that developers are not prioritizing building luxury housing. The same applies to residential conversions. How will this proposal guarantee deep affordability?

As for recommendations, I want to highlight the following:

1. Affordability Guarantees: The administration should strengthen UAP enforcement to ensure a significant percentage of units are guaranteed to be and remain affordable.



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2. Tenant Protections: No proposal centered around affordable housing can be truly authentic without other key protections in place for residents of the city. Increasing tenant protections through the proper funding of right to counsel legislation, as well as exploring aspects of universal rent control, tenant purchasing options and expanding voucher subsidies should not be excluded from this conversation. Another option would be to extend rent regulations to protect existing tenants from evictions where rents are exorbitantly and inexplicably increased making someone's dwelling unaffordable from one minute to the next. Further, we should dig deeper into the tens of thousands of rent-stabilized apartments currently not counted in the 1.4% vacancy rate that has been the cornerstone of this proposal. I'm sure we can find a little more housing in every neighborhood if we count those. I urge you to consider a parallel pathway to strengthening housing rights alongside access to affordable housing.
 3. Infrastructure Investments: Increased housing density will burden existing infrastructure, including transportation, schools, and healthcare facilities. The administration must plan on funding infrastructure improvements alongside housing development that will strengthen and improve quality of life.
 4. Removing Parking Mandates: Eliminating mandates in public transportation deserts will be harmful to many neighborhoods. If this proposal were to move forward, I urge that it be limited to areas within a half-mile of a railroad or subway station. The Council should consider instituting a municipal parking program that utilizes a multi-tiered, need-based assessment of areas where public transportation is inaccessible and in high density areas where prioritizing low-income commuting to these high volume areas where parking is limited.
 5. Community Engagement: It is important that communities are engaged early on and that concerns are explained and addressed. Educating, collaborating, and communicating with residents, community boards, and local organizations is crucial.
 6. Sustainable Design: An increase in construction and population density will strain natural resources and contribute to pollution. To prevent this, the plan should incorporate sustainable practices that promote green buildings, energy efficiency, and open spaces.



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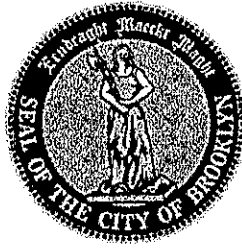
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7. Transit-Oriented Development: Council should consider permitting 5-6 stories in low-density residential in the Inner Transit Zone and permit 3-5 stories in low-density residential in an expanded Outer Transit Zone and introduce maximum dwelling unit factors within the Core Transit Zones.
 8. Accessory Dwelling Units (ADUs): The Council should explore the creation of a *Basement Apartment Pilot Program*, funded through state, city, and federal sources that will protect homeowners from inequities in accessing pathways to compliance. The Council should develop legislation to monitor the creation of new basement units and prevent discrimination. Increased funding should be provided for DOB to ensure timely and comprehensive inspections are carried out. We have seen too many tragedies resulting from poor building upkeep, including flooding, fires, and collapses. Public education should be provided to homeowners regarding ADU compliance and access to supportive resources to assist funding.
 9. Faith Based Development: While the city does not have a detailed description of the ways faith based organizations can develop their land, it is important that houses of worship be protected from predatory practices, as well as prioritized for engagement to develop supportive housing partnerships. A structure is needed that can extend housing opportunities for organizations that are limited by current zoning restrictions.
 10. Campuses: DCP should explore enforcement structures to ensure affordability requirements are imposed on new buildings where developers receive the highest percentages of return on investments. Remove all public land (NYCHA, schools, hospitals, etc.) from the Campus Infill proposal.
 11. Town Center Zoning: The Council should consider placing development restrictions on Special Districts such as City Island, where zoning changes may impact the geographic makeup of this district and detract from the characteristics that originally solicited the special designation.
 12. Small and Shared Housing: Supportive housing should be designed to incorporate adequate on-sight resources to ensure the success of residents, the building, and the community as a whole. Pathways should be developed for low-income residents to access homeownership through grant funding programs.



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During today's hearing, I hope to hear updates from the administration regarding the City of Yes including clear proposals on the amount of affordable housing guaranteed. I hope to learn more from advocates, residents, and developers about their recommendations. I hope we can all work together to ensure that real affordability is prioritized throughout the entire process. We must adequately invest and support New Yorkers who deserve fair housing and opportunities.

Thank you.



OFFICE OF THE BROOKLYN BOROUGH PRESIDENT

ANTONIO REYNOSO
Brooklyn Borough President

**City Council Committee on Zoning and Franchises
Hearing on City of Yes for Housing Opportunity
October 22, 2024**

Thank you to the Council for holding this important hearing today and for splitting it up into two days to allow for the public's voice to be heard in a meaningful way. I am Brooklyn Borough President Antonio Reynoso and I am here today to encourage the City Council to pass City of Yes for Housing Opportunity *in its entirety*.

Because our city doesn't plan – we zone – certain neighborhoods, usually low-income communities of color, have done way more than their share to address the housing crisis, while other neighborhoods have done next to nothing. For example, between 2010-2020 in Brooklyn, Community District 1 – which was rezoned in 2005 – added more than 18,000 new units of housing, while Community District 18 added only 500 units during that same time. That's almost **40 times** the number of housing units created in one district over another.

For affordable housing, the discrepancy can be even worse. During that decade, Brooklyn Community District 5 constructed and preserved over 12,000 units of affordable housing, while in Community District 10 the number is a meager SEVEN units. That's over **1,700 times** the number of affordable units constructed and preserved in East New York, New Lots, and Starrett City versus in Bay Ridge, Dyker Heights, and Fort Hamilton. Low-density neighborhoods make up almost half the city, and in some of these areas, no new affordable housing has been permitted since 2015, according to NYU Furman Center.

This is how we ended up with the least available housing in our city since 1968. The Regional Plan Association estimates that New York State needs to build over 800,000 housing units by 2032 to address current needs and meet expected population and job growth, and New York City needs to do its part. City of Yes isn't a silver bullet that's going to get us all the way there. But with this proposal, we have the opportunity to set a standard citywide that no neighborhood is exempt from doing their part for the greater good and contributing to new housing.

In my recommendations, I supported the proposal with significant conditions and modifications. Most importantly, the proposal to legalize ADUs must move forward. If the City Council removes ADUs from City of Yes, I will withdraw my support, because this is how we get to a more equitable framework that allows for lower density parts of the city to contribute. In parts of Borough Park, Bay Ridge, and Bensonhurst, more than a quarter of households are overcrowded, with families

doubling and tripling up. Allowing ADUs means more units in these neighborhoods, and on a practical level, it means that for these families, grandma can move over the garage, or a daughter and her family can move into a safe and affordable basement unit down the street, instead of out of the city.

Right now, the families leaving NYC at the fastest rate are people of color who make between roughly 30-50% of the Area Median Income, according to the New York Times. This has to stop, meaning we need more options for them, and everyone else, here in the city. Research has showed that the chains of moves sparked by new construction free up apartments that are then rented or retained by households across the income spectrum. In short, the availability of all kinds of new housing options benefits everyone.

To be clear, I'm not saying we don't need to build more affordable housing. I know there are some Councilmembers who want to require deeper affordability in the Universal Affordability Preference (UAP). I support this effort and acknowledge that more affordable housing is desperately needed, especially at lower incomes. However, I want to caution the Council to be mindful that this is a voluntary program. We need to find a balance that maximizes affordability without disincentivizing developers from taking advantage of the option. If the numbers don't pencil out, at the end of the day we'll be left with less affordable housing than we could have had under a well-considered plan.

In conclusion, I want to remind everyone that this proposal is just one chapter in a much larger book. Good planning has to be comprehensive, and planning for housing must consider not just zoning, not just production, but preservation of existing affordable housing and strong tenant protections as well. The Council should also pass meaningful legislation aimed at these goals, including those around broker fees, co-op disclosure, and public benefits on public land.

To the City Council, I want to repeat what I said to DCP: do not back down; do not scale back; do not shy away. If you're going to do anything, do more. Many things about the future are uncertain, but we know that right now, this is our shot to make changes that our city needs to move forward. Let's not waste it. Thank you.



October 22, 2024

STATEMENT OF THE NEW YORK LANDMARKS CONSERVANCY ON THE CITY OF YES FOR HOUSING OPPORTUNITY BEFORE THE NYC CITY COUNCIL (ULURP Number: N240290ZRY)

Good day Chair Riley and Council members. I'm Andrea Goldwyn speaking on behalf of the New York Landmarks Conservancy. The Conservancy is a 51-year old organization dedicated to preserving, revitalizing, and reusing New York's historic buildings and neighborhoods. We support efforts to increase affordable housing. We also want to ensure that New York's rich diversity of architecture continues to enhance the City: creating jobs, housing New Yorkers, encouraging sustainability, and welcoming visitors from around the world.

We have significant concerns with the process, the content, and the projected outcomes of City of Yes for Housing Opportunity (CoY/HO).

If CoY/HO is approved, many land use actions will no longer require ULURP. Why would you give up Council power and why would you mute the voices of your constituents? We object to this change. Residents have made investments in their communities. They should not be deprived of certainty, predictability, and a say in how their neighborhoods will evolve and grow.

CoY/HO is the biggest change to New York City's Zoning Resolution in decades. Yet it has been rolled out in less time and with less meaningful public outreach than any neighborhood or even site rezoning. We've participated in rezoning processes that have been developed over years, with input from residents. Their on-the-ground knowledge about their neighborhoods has complemented the City's planners and led to more appropriate rezoning – those valuable insights are missing here.

As there will be many new ways to acquire FAR and increase building size, at least more landmarks will have new opportunities to transfer their unused development rights. We support this benefit to landmarks but note that it will also bring significant changes to the blocks where the development rights land. It is vital that the City Council retains its review, and that the public still has a voice in this process.

But this is only a start. There is little projection of what CoY/HO will do to older buildings, designated or not. The environmental reviews gloss over impacts to historic resources. The neighborhood prototypes don't include any local, State or national landmarks or historic districts. If wide-scale development is the goal, City Planning should be working with the Department of Buildings to strengthen TPPN 10/88 standards that are supposed to protect landmarks from nearby construction.

We appreciate that rules for the conversion of commercial buildings to residential use will be eased but if we were writing a plan for housing New Yorkers, it would utilize existing resources as much as possible, instead of encouraging their demolition. Just three materials – concrete, steel, and aluminum – are responsible for 23% of total global emissions (most from the built environment). Retrofitting a building generally saves between 50 and 75 percent of embodied carbon as opposed to new construction. Re-use of existing buildings should be the starting point for how the City creates more housing.

Another existing resource that New Yorkers value is their green space. In a seeming contradiction to other City initiatives, CoY/HO prioritizes new construction over back yards and campus open spaces. They will all be chipped away as the 30-foot residential rear yard requirement, which has been in place for decades, is proposed to be reduced and ADUs and campus infill are permitted.

We are concerned about the changes to Special Districts. The rules for these Districts have been developed over years, and are especially calibrated for the particular needs of these communities. They should not be eliminated.

The outcomes of CoY/HO are unclear. If passed, it will dramatically change our streets and communities. It will give developers so many options for new, larger buildings that it is hard to see how many will opt to create affordable units with UAP bonuses. Thousands more luxury condos will not solve the affordability crisis.

Before the final vote, New Yorkers deserve to know if this will be the City where they want to live. In the past, we've seen the guardrails of the Zoning Resolution pushed to the edges. We've seen developers find loopholes to exploit. We've seen new buildings in rezoned neighborhoods that are far beyond City Planning's projections for development sites. That has only raised concerns about this massive set of changes, and the too-swift review.

This fast track has to slow down before you vote on the biggest overhaul of the Zoning Resolution in decades. We ask the Council to press pause and give residents more time to learn about the implications of CoY/HO. We ask the Council to keep the public's voice in the land use process; to ensure that affordable housing takes priority over luxury developments; and to protect our irreplaceable green spaces.

We're sure that you've heard from your constituents, with concerns about the City of Yes. It's crucial that those voices are heard. We hope and expect that Council members will respond to those concerns, make improvements to the proposal where possible, and eliminate sections where needed. City of Yes might have reached you in haste but its impacts will last for decades. We rely on you to ensure that this is the best way forward for New York and New Yorkers.

Thank you for the opportunity to express the Conservancy's views.



City of Yes Housing Opportunity

Good morning, Chair Riley and Council Members.

My name is Diah Mehera. I serve as Director of Marketing and Communications at Tech:NYC, a leading technology industry organization.

The housing crisis in New York is a serious concern. Earlier this year, Tech:NYC partnered with StreetEasy to release a [report](#) on housing availability in New York and the findings were ominous: the tech sector, a major driver of our city's economy, is struggling to attract and retain talent because of the exorbitant housing costs.

Young professionals are being forced to relocate to another city or forgo living in New York City altogether. That is not the future we want. We want a strong pipeline of diverse talent to be able to afford to live — and remain — here. This includes building their families, and continuing to foster innovation and economic growth.

But this is a citywide crisis, not only a tech crisis. The City of Yes proposal offers a solution — increasing the supply of housing, particularly mixed-income housing, to create a more inclusive city that benefits all its residents. This will benefit not only the tech sector, but also ensure more housing is built that is accessible to teachers, nurses, firefighters, sanitation workers, and the countless others who keep New York City running.

Tech:NYC recently co-authored an [op-ed](#) with Council Member Bottcher on the need for more housing, giving our support to two solutions proposed by City of Yes:

- Enact zoning reforms to allow modest increases in housing near public transit, which could give NYC the opportunity to create more than 1.1 million new homes and ease commutes for workers.
- Remove off-street parking requirements for new apartment buildings, which will reduce the cost of building new apartments and decrease rents.

Maintaining the status quo is no longer viable. The City of Yes represents a decisive move to keep New York's promise of opportunity alive for everyone.

Thank you for your time and consideration. I urge you to approve this critical proposal.



ELIZABETH BRATON
Chairperson

COMMUNITY BOARD 10

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KARYN PETERSEN
District Manager

PUBLIC TESTIMONY
To
NY CITY COUNCIL SUBCOMMITTEE ON ZONING AND FRANCHISES
PUBLIC HEARING
Regarding N 240290 ZRY
City of Yes for Housing Opportunity
October 21-22, 2024

On June 26, 2024, Community Board 10 Queens voted unfavorably on the Department of City Planning's *City of Yes for Housing Opportunity* proposal. Our Board's vote was unanimously against the proposal with no abstentions. While we appreciate the time and effort DCP devoted to providing explanations as well as answers to questions raised at our meetings, our concerns on some specific issues led us to communicate to the City Planning Commission an explanation as to why CB10 opposed DCP's proposal and changes to the proposal Community Board 10Q requests. We ask the City Council to reject the proposal as submitted by DCP and to effect the changes we support.

Explanation of Community Board 10's Position

The list below reflects the topics that concerns expressed at our meetings and at our public hearing were or were related to:

Flooding
Transit zones/Town Center
Overdevelopment/Parking

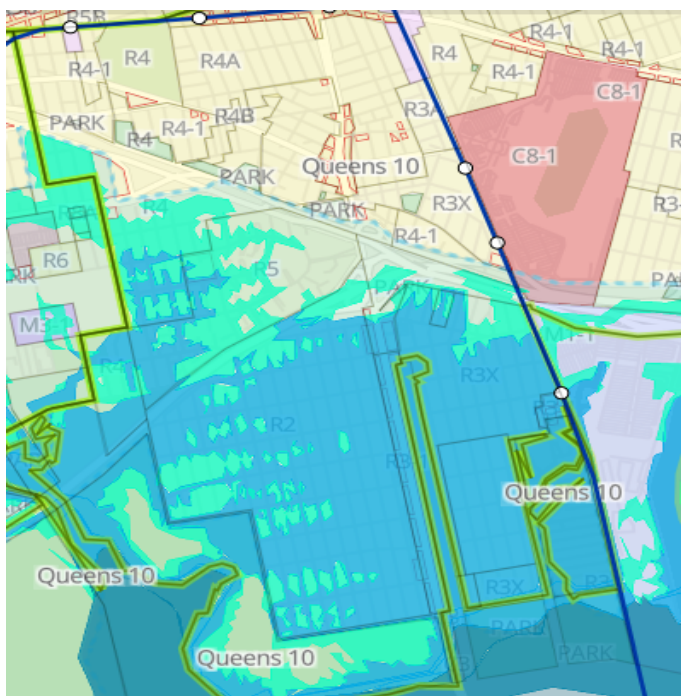
Infrastructure
Essential services
Community character

During our June 6th regular Board meeting the public presentation by DCP was aimed for our Board members to get a fuller understanding of the proposal. Numerous members of the public were present but their opportunity to ask questions was limited to the meeting's public session period toward the end of the meeting as the presentation was not part of a Public Hearing on that evening. As a result, at the request of our Land Use Committee Chairperson, we then conducted an informal question and answer session just for the public on June 12, 2024. DCP staff attended to answer questions. That session was well-attended, and the general tenor and tone was negative from the public present. The concerns of those who attended were apparent in the questions asked and in comments made in parts of many of the questions. The concerns expressed generally also revolved around those topics in the list above.

On June 18, 2024, Community Board 10 conducted its Public Hearing regarding the proposal. We received written comment in support from one couple who reside within Community Board 10 and a couple of letters from individuals residing other parts of Queens stating opposition. We also received a support statement from AARP and one from a group of 130 other organizations city-wide in support.

At our June 6th and June 12th sessions and again at the June 18th Public Hearing we provided copies of DCP's checklist so that people who did not wish to speak could provide their feedback. People handed them in as they left at the close of those 3 sessions. All but one we received expressed opposition. Most just checked off "do not support" without providing anything in the comment box. (Those we received on June 6th were anonymous, but those received on June 12th and June 18th included names.) There were 30 people who spoke at the Public Hearing on June 18th. All were residents of Community Board 10. All expressed opposition.

Based on the overwhelming opposition expressed by our residents and Board members over the course of those six weeks, we respectfully requested the Queens Borough President consider the following regarding CB10's position as our Borough's position was formulated. We also requested that the Department of City Planning and the City Planning Commission consider the views expressed below to gain a fuller understanding of why CB10 voted unfavorably. We hoped that the DCP and Commission would address our concerns as their review of the proposal took place prior to submission to the City Council. It did not. Our neighborhoods still are expressing their opposition to COY/HO. We now ask the City Council to make the changes we request.



The devastating impact by Hurricane Sandy (2012) showed our city is one of the most vulnerable cities to coastal flooding around the globe. The low-lying areas in NYC can be flooded by nor'easter storms and North Atlantic hurricanes. The frequency of Hurricane Sandy-like extreme flood events is very likely to increase significantly as we move into the future due to the compound effects of sea level rise and climate change.

Currently, tidal flooding seriously impacts CB10's Howard Beach and Hamilton Beach areas. Other areas within CB10 suffer from flooding related to rainstorm water. It should be noted that Superstorm Sandy's damage in our area primarily resulted from storm surge unprecedented by our experience from prior storms. Hurricane Ida that severely impacted Queens was essentially a rainstorm event not accompanied by excessive tidal flooding as did Isaias. Neither Sandy, Irene, Ida, no Isaias were storm events in which major damaging winds were combined with major tidal surge and record-breaking rain.

The potential for damage from future catastrophic storms is real in many parts of our borough and certainly within CB10. Should we experience a major storm that has all three elements - tidal surge similar to, or greater, than Sandy, rainfall similar to Ida and other recent rainstorms, and the level of wind similar to those that have occurred in other states - the devastation potential is very real in CB10. While there is a city-wide need to create housing, it is imperative to us in CB10 that NO increase in density be permissible in any part of CB10 that is currently within the 1% flood plain.

All the blocks (*approximately a third of CB10's total land area*) shown in the picture above should be removed from any part of COY/HO that would allow for any increased density. Certainly, all the areas shown in blue should be. All the areas in blue or green were devastated by Superstorm Sandy. Much of the area has also been impacted severely by subsequent storms of lesser intensity. Further, our view is that **increased density should NOT be permissible in any of the neighborhoods in our district currently within the 2% flood plain. Those areas potentially may be subject to future inclusion within the 1% flood plain.**



It should be noted that large segments of our Ozone Park and South Ozone Park neighborhoods shown in this picture are currently located in NYCEM hurricane evacuation zones, which is a clear indication that future hurricanes could, and given the effects of climate change, probably will, impact them in the future. **Housing density must continue to be limited in them if COY/HO is about planning for the future.** Numerous other governmentally generated maps, whether federal, state, or city, similarly depict projected increases in land areas and residences that will be impacted by flooding in coming decades.

Transit Zones & Town Center Zoning

CB10 also has major concerns with the proposed Transit Oriented Development provisions in DCP's proposal which would allow 3-5 story apartment buildings within a half mile of subway stations on wide streets or corners. We also have major concerns regarding the Town Center Zoning provisions that would allow ground floor commercial uses with 2-4 stories of housing above.



In our Howard Beach neighborhood, our concerns on these proposals mesh with our flooding concerns for a number of reasons. The Howard Beach/Airtrain Subway Station is located within the Howard Beach area located east of Crossbay Blvd. on Coleman Square in what is known to almost all residents living in Old Howard Beach as "town." Its location is within a small C1-3 overlay where the underlying zoning is R3-1. The 2 bodies of water identified as A and B in the picture are not separate. In actuality, they are connected by a passage under the railroad tracks. Historically this entire commercial area has been regularly subject to tidal flooding that comes from 3 different

directions. The area, as is the rest of Old Howard Beach and Hamilton Beach, is impacted now more and more frequently many times a month even at times when there is no storm event. As recently as the week of Oct.13-19, 2024 there were again multiple days of flooding.

All of Hamilton Beach, Old Howard Beach, and the Coleman Square commercial area are the sections of CB10 most vulnerable to tidal flooding. New Howard Beach and the Crossbay Blvd. commercial area is also

subject to tidal flooding more and more frequently. Parts of the Lindenwood area of Howard Beach are subject to both tidal and storm water flooding.

As we said above, the Coleman Square area is known locally as “town” and has been so known for generations. There is a reason for that. Hamilton Beach and Ramblersville were the first areas in Howard Beach to develop. The small, frame commercial buildings in “town” were essentially almost all constructed in the early 1900s and are mostly ground floor retail commercial with 1 story of currently occupied housing above. During the 1930s and 1940s most of the rest of Old Howard Beach developed. Prior to the 1950s the area was a town center that served Old Howard Beach and Hamilton Beach and the former LIRR station for decades before any of the other areas in today’s Howard Beach west of Crossbay Blvd. came into existence during the post-World War II building boom.

In the picture above the arrow is pointing south toward the rest of the R3-1 zone within Hamilton Beach. The black line just above the arrow indicates where the current Hamilton Beach Special Purpose District ends. This Special Purpose District was created by a resiliency rezoning project developed by DCP in collaboration with the community for the purpose of limiting density. In light of this current DCP proposal, hindsight indicates we should have pushed to have “town” and the rest of Old Howard Beach included in it due to the flooding similarities and the historical connection to Hamilton Beach. That rezoning and the Special Purpose District was completed just a few years ago. **At no time during the discussions with DCP was there any inkling from it that apartment buildings that would increase density could be or would be considered appropriate there.**

Our view is **that the entire C1-3 area suffers from the same tidal flooding as Hamilton Beach regularly. In our view it is a totally inappropriate area to allow any type of multiple dwellings to be developed there.** For example, were the corner directly opposite the current Howard Beach/Airtrain Station to be developed with any kind of an apartment building, its residents would find that they often would need hip boots to cross the street to reach the station. **Whenever there is tidal flooding in Hamilton Beach and the Coleman Square commercial areas there is also tidal flooding on many of the blocks within Old Howard Beach currently zoned R2 or R3X. It is our view that there be no provision to allow development of any type of multiple dwellings in those areas either.**

We respectfully request the City Council to strongly oppose inclusion of the Howard Beach/Airtrain Subway Station area as an area where any transit-oriented development as described in DCP’s proposal be permissible. Further, we request that the City Council support **extending the current Special Purpose District to include all of census tract 884** in it as virtually all blocks within that tract flood frequently now and will see more flooding in the future. Attached to this statement are some pictures of what a regular occurrence in the C1-3 area is. That type of flooding shown is also typical and occurring more and more frequently on many blocks within Census Tract 884.

CB10’s concerns regarding allowing development of multistory commercial/residential uses within our district on our other commercial strips are somewhat similar yet different as well. **Our view is that there should not be any as-of-right ability to do so.** Our view is that there perhaps will be some areas along our Crossbay Blvd. commercial strip in Howard Beach and along parts of the commercial areas of Crossbay Blvd. in Ozone Park where such development could be feasible, **but they must be approached on a case-by-case basis through a separate zoning action requiring full community review.**

Although it is not germane to this proposal a workforce housing component was part of Resorts World’s recent presentation regarding its plans should NYRA close and Resorts get approval for a full gaming license. That would be something we could consider favorably depending on its specifics. You may not be aware that years ago, long before casino gambling at Aqueduct was even talked about, there were numerous rumors that NYRA was closing. As that area is basically centrally located in our district, CB10 along with local civic

leaders at that time in all our neighborhoods, engaged in an effort spearheaded by then BP Shulman to develop a conceptual plan with City Planning for a new community there. CB10 is not necessarily opposed to considering new housing. **However, we are opposed to the types of higher density housing development within our existing neighborhoods DCP's current proposal would enable.**

In 2013 a large zoning action, known as the Ozone Park rezoning, was approved. The name "Ozone Park Rezoning" is somewhat of a misnomer. That action also incorporated parts of South Ozone Park and Richmond Hill. We wanted all of Richmond Hill and South Ozone Park included, but DCP felt that would make the study area too large.

That 530 block Ozone Park rezoning was undertaken in response to concerns raised by Community Boards 9 and 10, local civic organizations, and local elected officials that existing zoning did not closely reflect established building patterns or guide new development to appropriate locations. Most of the study area was within CB10. The proposed actions sought to reinforce the area's predominant one-and two-family residential character, while directing moderately scaled new residential and mixed-use development to locations along the area's main commercial corridors and near mass transit resources. **According to DCP's own words in the project documents then, DCP expressed that "the existing zoning does not adequately reinforce the one-and two-family character typically found on the residential blocks."**

DCP further **stated "Existing zoning also does not distinguish major commercial corridors from residential side streets. As a result, recent development has not been located along main commercial corridors where it could reinforce and strengthen established mixed-use areas."**

In that rezoning, areas along the Liberty Avenue commercial and transportation corridor where density increases made sense were incorporated with some upzoning while downzoning was done in the residential neighborhoods. DCP's current proposal will effectively undo much of what was accomplished with that rezoning. That is not acceptable in the neighborhoods involved in the Ozone Park Rezoning area. It is not acceptable to the people who own homes and supported it just over a decade ago. For the most part those neighborhoods consist of attached and detached 1&2 family homes primarily currently zoned in R3-R5 districts. New apartment houses make no sense to those residents other than perhaps on parts of Liberty Avenue. No support that we are aware of has been expressed by residents and homeowners on the residentially zoned side street blocks south of Liberty Avenue to allow development of multiple dwellings now that are not permitted by the 2013 rezoning.

Overdevelopment/Parking/Community character

Within CB10 there is an almost palpable fear among residents that uncontrolled development is what they will see in their neighborhoods if this DCP proposal is approved. The elimination of parking mandates for new development is not supported at all in any of our neighborhoods. While a city-wide goal to lessen the dependence on cars may be in some ways desirable, the need of our residents to get wherever it is they want to go safely and in a reasonable amount of time will continue their use of cars. Parking space shortages in both our residential and commercial areas are constant complaints all over our district. For many years for any development anywhere in our district that required any type of a zoning action the provision of sufficient parking has been very much an issue in discussion between the Board, our residents, and the developer. For many years data published in the NYU Furman Center's annual *State of New York City's Housing and Neighborhoods* reported CB10 has among the highest rates of home ownership of 1&2 family homes out of the city's 59 CBs.

That is consistent across all our neighborhoods. Although we have some multifamily apartment buildings, the essential character of all our neighborhoods is low density residential primarily comprised of 1&2 family

homes with some 3&4 family units also mixed in. The concept of allowing accessory dwelling units is opposed in all parts of our district.

Infrastructure/Essential services

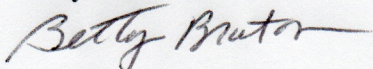
Residents of CB10 do not consider existing infrastructure sufficient to meet their needs. The need for roadway repairs is a constant complaint. Capital road and sewer projects take decades to advance to construction. Con Edison's grid in our area is insufficient to meet current needs, particularly in parts of our South Ozone Park neighborhood. Our residents fear that in the absence of considerable infrastructure improvements prior to further development occurring, their quality of life will deteriorate.

Many of our schools, particularly in the northern parts of our district are overcrowded. For years the provision of new schools has been our first Capital Budget priority. In the view of our Board and our residents our police precinct is understaffed. Assigning additional personnel to the 106th Police Precinct has been our first Expense Budget priority for years. Our crime has been growing, historically. Over the last 23.5 years we have experienced increased major felony crime in more than half of those years. Our call for more officers is not just driven by the current situation in our city. Our population, both residential and ambient, continues to grow. We are seeing a disconcerting pattern of increases in major felony crimes against persons as opposed to property crime. We are also seeing that the percent of major felony crime occurring in our precinct in relationship to crime occurring in Patrol Borough Queens South overall has been increasing as well in recent years. It is no surprise to our Board that our residents feel our police services are insufficient now and they fear increased development will exacerbate the lack of police services. Our residents are also fearful that other essential services such as fire and sanitation will not keep pace with development.

We realize this statement is lengthy. However, CB10 feels it is needed to explain why our vote was unfavorable on the COY/HO proposal. There were some provisions, particularly among the district fixes section, that we possibly might have supported, but overall, our residents and the Board believe the content of the whole proposal is far too broad to be supported. Even though the proposal is broken down with proposals for low density, high density, and other categories, we are not a one size fits all city. CB10 is considered a low-density district by the proposal. However, the proposal as put forth by DCP seems not to recognize that there are differences even among Community Board districts lumped together into categories like low density, etc. The many areas Community Boards serve in low density areas all across the city are also not one size fits all.

NYC is a large city however our view is that our city is a collection of neighborhoods, especially in Queens where the sense of neighborhood identity is very real to our residents. Most NYC Community Board districts when looked at by their populations are larger than most cities in this state. Some CBs, like CB7Q and CB12Q in particular, along with some other Queens districts, have populations larger than many NYS counties. By and large our CBs are larger than many, many cities in the country. What is acceptable and rational zoning for any of our districts needs to be evaluated and reviewed individually in each district, taking into account the nuances of differences between them vis a vis housing patterns and desires of the residents. CB10Q asks the City Council to reject COY/HO as presented and if changes are made by the Council they incorporate and fully address our views. Thank you.

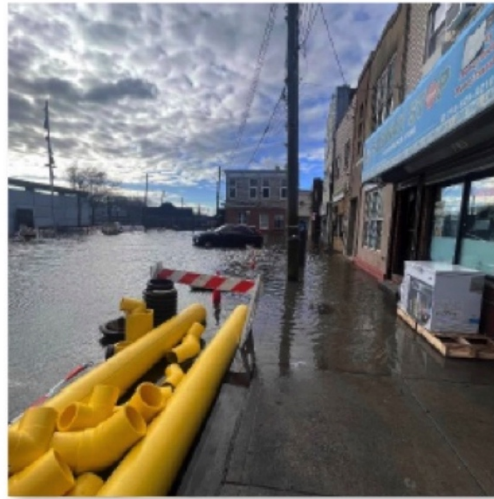
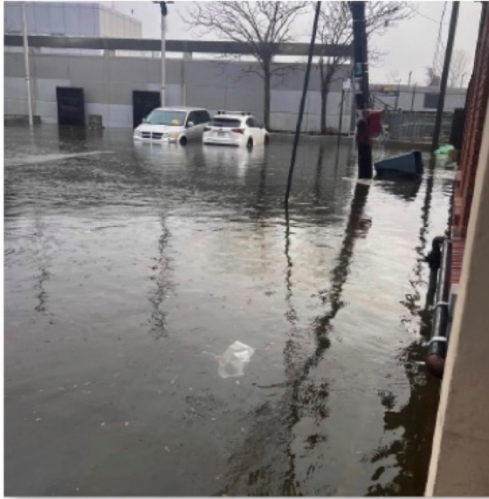
Betty Braton



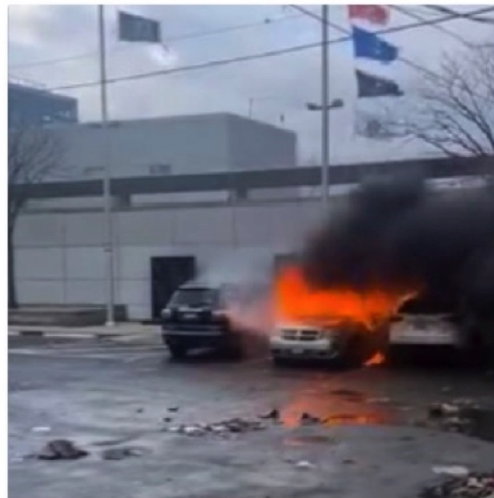
Chairperson

C: Hon. Adrienne Adams, City Council Speaker
Hon. Adrienne Adams, Council District 28

Hon. Joann Ariola, Council District 32



These picture are of recent flood in the Coleman Square area and depict what is a common occurrence.



REBNY Testimony | October 22, 2024

The Real Estate Board of New York to The City Council on N240290ZRY, City of Yes for Housing Opportunity

The Real Estate Board of New York (REBNY) is the city's leading trade association for real estate, representing commercial, residential, and institutional property owners, builders, managers, investors, brokers, salespeople, and other professionals engaged in New York City real estate. We are pleased to support the City of Yes for Housing Opportunity (N240290ZRY) citywide text amendment.

REBNY strongly supports the goals of Housing Opportunity, which marks one of the most significant updates to the zoning resolution since 1961. New York City is facing a housing crisis deepened by years of under production and evidenced by a 1.41% citywide vacancy rate. New York City has lagged behind rapidly growing cities like Orlando, Dallas, and Phoenix over the past decade in permitting housing units. While housing production remains anemic, rents continue to rise, and outdated zoning regulations hinder the construction of much needed homes to address this crisis.

The zoning reforms in City of Yes for Housing Opportunity are therefore essential to the city's goal of producing 500,000 units over the next decade. REBNY especially supports key components of this proposal such as the expanded opportunities for office-to-residential conversions, increased density through the creation of R11 and R12 districts, and the introduction of a Universal Affordability Preference (UAP). The changes for office to residential conversions align with the recommendations by the City Council created Office Adaptive Reuse Taskforce. Additionally, these measures align with the recently adopted tax incentives 467-m and 485-x created through this year's State Budget and have the potential to lead to the creation of thousands of affordable homes for New York City residents.

The changes embodied in this text amendment represent the next generation of zoning rules for the planning, design, and development of housing for New Yorkers. This proposal can ensure housing of all types and sizes are built and we ask that the City Council carefully consider any changes through the lens of whether those changes will protect, encourage and enhance the housing pipeline for the city. We look forward to collaborating with the Council on refinements to the proposal. Thank you for your consideration of these points.

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American Planning Association
New York Metro Chapter

Creating Great Communities for All

Housing Opportunity Through Zoning Reform

Submitted by the Housing and Neighborhood Revitalization Committee of the
Metro Chapter, American Planning Association

Thank you for the opportunity to submit comments on the proposed “City of Yes for Housing Opportunity (COYHO)” zoning text amendments on behalf of the American Planning Association New York Metropolitan Chapter (APA-NYM.)

Introduction

The American Planning Association (APA) exists to elevate and unite a diverse planning profession as it helps communities, their leaders and residents anticipate and navigate change. In 2024, APA’s sole policy priority is advocating for support for zoning reform as it is key to increasing much needed housing supply, a crisis that continues to accelerate nationwide. Our colleagues throughout the country are advocating for locally led zoning reform to break down regulatory barriers that stand in the way of producing more housing. Consistent with this national policy, APA-NYM, supports many of the proposed zoning text changes included in the COYHO that enable accessory dwelling units, removal of mandated parking requirements, transit-oriented development, enhanced town centers, and small and shared housing. We commend the primary goal of having all neighborhoods contribute to increasing NYC’s housing supply.

Addressing New York City’s Housing Crisis

We concur with the DCP’s conclusion that New York City needs to facilitate the development of a substantial amount of new housing. The Adams administration has a goal of adding 500,000 additional units within 10 years. We do not know how this number was derived or if it is the correct number of new dwellings needed but we agree that the current vacancy rate of less than 1.4 percent for rental housing in general and less than 1% for housing renting at amounts 30% or less of area median income, is harmful to the city’s well-being and to its residents. This shortage of housing raises housing prices for New Yorkers at all income ranges and deters mobility – keeping too many residents in apartments



that no longer accommodate their needs while carrying an unreasonable rent burden and leaving far too many residents with no housing at all.

With the City's housing goals in mind the COYHO proposes to create conditions for the addition of about 110,000 units. The environmental review documents indicate that the new units would be added by 2039 or an average of about 7,300 per year. In effect, production of 110,000 units sounds like it would provide better than 20 percent of the decade-long goal when it would be more likely to produce less than 15 percent of that goal. Considering that housing production in New York City has not reached or exceeded 500,000 in any decade since the 1920s, the COYHO notwithstanding, there is still no pathway laid out to reach the 500,000-unit target.

We appreciate that, unlike previous administrations, this proposal seeks to encourage housing production throughout the city. Zoning reform is a critical step in removing barriers to needed housing production. However, the development of needed affordable housing requires added measures such as increased funding, technical assistance and education. We have advocated for the creation of the Federal HUD managed Pro Housing Fund to support similar planning efforts and are pleased to see that the NYC Department of Housing Preservation and Development (HPD) received close to \$4 million from the recent round of funding to support neighborhood planning, City Environmental Quality Review (CEQR) reforms, public education and engagement to facilitate the development of affordable housing. We urge the administration to increase capital funding for the development of affordable housing and adequately staff the HPD to manage funds and projects. The passage and implementation of J-51 tax abatements, long used to support preservation of affordable housing, is one quick step forward.

We raise several concerns for the Commission to consider in evaluating public comments and revisions to the COYHO.

Universal Affordability Preference

The proposal would eliminate both the original R10 Inclusionary Housing Program and the later Inclusionary Housing Designated Area (IHDA) Program while adding a new Universal Affordability Preference (UAP). We heartily support replacing the



R10 program which was designed in an era when other housing subsidies were not available in the high-value R10 districts and, consequently, the affordable housing it produces, while needed, account for less than less than five percent of a project's dwellings.

One benefit of the UAP is that it is universal and will not require the lengthy time and effort required to individually rezone areas to make Inclusionary Housing programs applicable. It is less clear how effective the UAP would be in areas that are now designated as IHDA's. In an R6 district within an IHDA today, for example, the base FAR is 2.7 within 100 feet of a wide street and 2.2 on other lots for developments that choose not to provide affordable units. If the development includes the IHDA affordable units, the permitted residential FAR goes up to 3.6 and 2.42 respectively. Under the COYHO, the base FAR within 100 feet of a wide street increases to 3.0 from 2.7. If affordable housing were provided pursuant to the UAP, the maximum residential FAR in R6 is increased to 3.9 provided that the additional FAR is devoted to affordable housing. It is unclear if this is workable.

Would property owners on wide streets currently within IHDA's just take the increase to 3.0 FAR and forego the available 3.9 FAR? That additional FAR is unlikely to be profitable. It seems the program would be reliant on incentives under the State's 485-X program. For many if not most developments in an R6 district, the project would contain less than 99 units so a developer would have to provide 20 percent of the units as affordable which for a 3.0 FAR building would account for 0.6 FAR of affordable housing and 2.4 FAR of market-rate housing. For a developer taking advantage of the UAP-available FAR of 3.9, 0.9 FAR of the 3.9 FAR – 23 percent - would have to be affordable. It is incumbent upon the City to show that the UAP will work in this example (as well as others). If it doesn't work, developers who would have chosen the IHDA example may now just build 3.0 FAR without any affordable housing (or 3.0 with only 0.6 FAR of affordable housing).

Rear Yards

Since 1961, both the Multiple Dwelling Law and the Zoning Resolution have generally required 30-foot rear yards for residential development. Where opposing rear yards back up on each other, the resulting space is designed to be a minimum of 60 feet deep. It is not by accident that this is the same depth as the



width of a typical narrow street in New York City. In this way, units in the front and back of dwellings are entitled to a similar degree of light and air. The COYHO proposes to change the minimum depth of a residential rear yard to 20 feet up to a height of 70 feet.

We understand that this is a necessity when creating rear accessory dwellings in low-density neighborhoods. Fortunately, residential buildings in these neighborhoods have rarely exceeded 35 feet in height so, generally, there are not tall structures that would diminish access to light and air in the proposed reduced-depth rear yards and there are recent prototypes in certain Brooklyn low-density neighborhoods where reduced-depth rear yards have been permitted by special permit.

In middle- and high-density neighborhoods, these smaller rear yards and rear yard equivalents would be bordered by tall structures, meaning that the rear units of these buildings – and the rear units of buildings on the parallel street the face these reduced-rear yards – would now have a significantly bleaker environment outside their windows. It is unclear why this is thought to be needed. In a typical 100-foot-deep lot in a middle and high-density district, the front of the building is at or near the street line and, when providing a 30-foot-deep rear yard, 70 feet is available for the depth of the apartment building. Most apartment buildings are built with a depth of 60-65 feet. While there may be instances where a shallower-than-30-foot-rear yard might be needed, it hardly seems necessary to obliterate the rear yard protections for all middle- and high-density residents.

Commercial to residential conversions

We support the expansion of the conversion of commercial to residential buildings to a city-wide applicability as well as inclusion of shared housing as an eligible housing type. We do question the lack of affordability requirements. The several completed commercial to residential conversions in Manhattan's financial district produced expensive high-end units. We understand the potentially high costs of conversion will prohibit affordable units without substantial assistance. The new Affordable Housing Commercial Conversion Tax Incentive Benefits (AHCC) passed in this year's State budget, will require projects to make 25% of their units affordable at an average of 80% AMI to receive a 35-year property tax exemption ranging from 65 to 90% and decreasing by 10% for the last five years.



It is unclear how attractive developers will find this program. Again, consideration should be given to exploring other funding, incentive and tax abatement programs to encourage the production of affordable units in these conversions.

Accessory Dwelling Units

The allowance of accessory dwelling units is a strategy employed across the nation to increase housing supply in lower density areas such as in California, Connecticut and Oregon. We support this with the concern recognizing that the development of ADUs will be challenging, particularly for low and moderate income homeowners. We applaud the recent announcement of a \$4 million allocation to create an ADU pilot program of up to 20 owners as well as other tools to facilitate these projects. Reaching the proposed goal of 40,000 new ADU's will clearly require more financial assistance.

Campus Infill Proposal

The campus infill proposal includes the expansion to 50% of lot coverage for development which is considerably more lot coverage than most existing campuses. This proposal should include requirements for mitigation of loss of public space and recreational areas, community participation procedures in the planning and review process and inclusion of affordable housing requirements. This is particularly important for NYCHA campuses, where residents have endured long standing deferred maintenance due to reductions in Federal funding.

Lower-Density Neighborhoods

We commend the DCP for developing a proposal that asks all areas of the city to contribute to addressing the city's housing shortage. However, it does not do so evenly. Shortly after the first Zoning Resolution was adopted in 1916 it was modified to recognize the difference between single- and two-family neighborhoods. For more than a century – indeed since the consolidation in 1898, one of the city's strengths has been that it incorporated some of its suburbs within the city limits. Clearly, if the burdens, such as they are, of accommodating more housing is to be spread out, lower-density districts should not be



exempted. It also seems likely, however, that the lower-density areas of the city would be subject to more change than the middle or higher-density districts. Adding 0.3 FAR to the maximum allowed along a wide street in an R 6 district would add about 8 percent more floor area and perhaps one additional story to areas where apartment houses are already common.

Permitting 2.5 FAR, five-story buildings in an R3-2, district (with an 0.6 FAR) in Laurelton with single-family homes is a potentially far more neighborhood character altering than anything proposed for the middle and high-density districts. That is why so many of the speakers in opposition to COYHO were from residents of low-density communities. We encourage the City Planning Commission to re-examine its approach to these communities with a more sympathetic eye. Perhaps a more modest building could accommodate a similar amount of development at less than 5 stories at 2.5 FAR. Perhaps, merely fronting a wide street in a lower-density community is not as important as the creation of real town centers in these communities' commercial cores, with greater transit options and possibly higher FAR.

Conclusion

APA-NYM appreciates the ambitious effort made by DEP and CPC in the COYHO, the most comprehensive zoning text amendment since 1961. The over 1,200 pages of varied changes require considerable review to understand the impacts on current zoning created over the years including: special districts and many text elements addressing housing quality, neighborhood services and infrastructure requirements, however they will generate much needed housing. We advocate for continued public education and support to implement these reforms.

However, increased affordable housing requires more than zoning reform. New York State recently took the supportive actions of lifting the residential FAR cap and approving the tax abatements: 485-X and the AHCC. We urge NYC to use these tools and to continue to seek additional resources to support development of affordable housing to meet the needs of all New Yorkers.

We thank you for this great contribution to advancing New York City's housing supply and the opportunity to comment on this important proposal.



www.TheBlackInstitute.org

**Testimony of Julio Herrera
Executive Assistant**

before

**The Council of the City of New York
The “City of Yes” Initiative and its Detrimental Impact on the
Communities of New York City.**

October 22, 2024

Good morning, my name is Julio Herrera, and I am the Executive Assistant for The Black Institute, a think tank that takes action. We actively implement ideas into actionable outcomes that directly benefit Black communities and people of color. Our strategic initiatives focus on education, environmental justice, immigration reform, and economic fairness, with a fervent interest in truly affordable housing for every New Yorker.

I would like to thank the Chair and members of the Subcommittee on Zoning and Franchises for holding this hearing and allowing the voices of their constituencies to be heard.

The City of Yes falls into the same formula that long-standing residents have become all too familiar with. A plan packaged with ambitious ideas and broad goals that claim to address crucial needs that have afflicted this city for years, reinforced by arbitrary figures that offer a thin veil of reassurance to convince hardworking residents that these measures are in their best interest.

Firstly, The City of Yes lacks sufficient guarantees that environmental justice will be at the forefront of these new developments, despite this Administration's pledge to address such disparities. As an example, accessory dwelling units, such as basement units, are often improvised modes of housing marketed to vulnerable families and individuals and in the last few years, have hosted disaster. We have witnessed these dwellings experience intense flooding such as during Hurricane Ida which claimed the lives of at least 11 people and displaced dozens more. What guarantees does the City of Yes provide to tenants who would reside in those dwellings? What is your plan to prevent more residents from succumbing to such tragedy?

Secondly, advocates of this plan have stressed that affordability would be provided because of its implementation. The only question I raise is affordable to who? The apartments created will be too expensive for most working New Yorkers, with only 20% considered "affordable"—and only for those making 60% of Area Median Income (AMI). Meanwhile, more than half of New Yorkers are already rent-burdened, spending over 30% of their income on rent. Furthermore, the number of units pledged by this plan fails to reassure. The City of Yes pledges to construct 58,000 – 109,000 homes within the next 15 years. To break that down into simpler terms, that roughly translates anywhere from 3,900 to 7,300 homes – about 780 – 1,460 per borough per year. Of that miniscule number of housing units generated, how many can we expect to be truly affordable?

Lastly, the plan allows developers to skip the public review process, Chair Garodnick mentioned yesterday around less than 1% of developments will be subject to this change. What stipulates exemption from these conventional zoning processes remains unclear and leaves New Yorkers out of decisions that impact their neighborhoods. Local voices, including those on community boards, deserve to be heard and play a role in how their neighborhoods grow and change.

The City of Yes initiative presents itself as a solution to New York City's challenges when it comes to zoning and housing. However, it falls short in addressing the urgent needs of our communities. The lack of strong guarantees for environmental justice raises serious concerns, particularly given the tragic history of inadequate housing protections. Furthermore, the proposed "affordability" fails to meet the real needs of working New Yorkers, and bypassing community input in the zoning process

undermines the very essence of a community. You should not only take my word, but 36 of the 59 Community Boards in the city voting fully or partly against it.

I am a tenant, a proud born-and-bred South Brooklynite who on behalf of my family and my community I say, cannot afford more grand promises with diminished returns, all while we struggle to live in a city that seems to want to price us out every day. Until we see a plan that prioritizes true affordability, environmental & tenant protections, and the preservation of our communities. I urge you to vote no to the City of Yes.

CATHOLIC COMMUNITY RELATIONS COUNCIL

191 Joralemon Street, 2nd Floor, Brooklyn, NY 11201

**Testimony of Joseph Rosenberg, Executive Director
Catholic Community Relations Council before the
New York City Council Subcommittee on Zoning and Franchises
City of Yes for Housing Opportunity**

October 22, 2024

Good morning, Chair Riley and members of the New York City Council Subcommittee on Zoning and Franchises. I am Joseph Rosenberg, Director of the Catholic Community Relations Council representing the Archdiocese of New York and the Diocese of Brooklyn.

We strongly support the City of Yes for Housing Opportunity, which focuses on many current zoning obstacles preventing the development of housing throughout New York City. Our City faces a severe housing crisis, and this crucial updating of New York City's zoning laws could not be timelier.

Catholic Charities of both the Archdiocese of New York and the Diocese of Brooklyn and Queens understand our City's housing challenges and focus on the mission of producing affordable housing. They have developed respectively over 6,500 affordable units, housing the neediest New Yorkers, such as working families, low-income elderly, and the formerly homeless. In addition, both dioceses own buildings and vacant land that are burdened by obsolete zoning laws precluding these properties from being used to develop housing. The City of Yes would eliminate or relax many of these obstacles.

For too long New York City has required off-street parking spaces to be incorporated into housing developments. This burdensome mandate reduces the number of apartments that can be built on-site, as well increasing housing construction costs. Removing this mandate is long overdue and would allow space that was once reserved for cars to now be used to produce apartments for New Yorkers.

The Universal Affordability Preference would benefit Catholic Charities' housing programs by providing a bonus of 20% additional affordable housing units in medium and high-density districts where the underlying development is 100% affordable. This density increase would produce a significant amount of affordable housing Citywide.

The City of Yes contains other significant initiatives that would be instrumental in generating housing while assisting faith-based organizations. Currently, landmarked buildings can only transfer development rights to adjacent properties or those directly across the street. In many cases, those receiving sites are already built to capacity and there is nowhere for the landmark development rights to land. The City of Yes changes this by allowing the development rights of landmarked buildings to be transferred to properties on all blocks adjacent to where the landmark is located. Not only does this create the opportunity to generate housing in these communities, but it also provides funds for parishes to maintain and repair their landmarked churches. Many churches are over a century old, contain stained glass, slate roofs, and ornate stone exteriors. Conserving these landmarked buildings is extremely costly, and this program combines the welcome elements of spurring housing while creating an income stream for both dioceses to help

repair and maintain landmarked houses of worship, something that is not available for any faith-based organization from the federal, state, or local government. The potential funding stream would also go far towards assisting other important parish activities such as creating and expanding food pantries.

We strongly support the campus infill initiative which would allow faith-based organizations and other institutions to develop housing on vacant land where current zoning regulations preclude such use.

The City of Yes includes other innovative programs that would help faith-based organizations develop housing in their buildings and vacant land. One of these would allow the conversion to housing of convents and rectories, a process which is currently extremely challenging and costly.

The conversion of office and commercial buildings into housing is also essential to address our City's housing crisis. Currently, this is only permitted in a limited geographic area in Manhattan where buildings were constructed before 1961. The City of Yes expands the conversion opportunities citywide to office and commercial buildings built before 1991, providing the opportunity to build affordable as well as supportive housing.

This comprehensive and innovative initiative will be indispensable in helping to alleviate our City's housing crisis. We urge its passage by the City Council.



The Community Preservation Corporation
220 East 42nd St, 16th Floor
New York, New York 10017

New York City Council Subcommittee on Zoning and Franchises

Public Hearing on City of Yes for Housing Opportunity | October 22, 2024

Thank you, Chair Riley, and members of the Subcommittee on Zoning and Franchises. My name is Emily Klein, and I am the Assistant Vice President for Policy and Government Affairs at the Community Preservation Corporation (CPC), a nonprofit community development finance institution (CDFI) formed in the early 1970s to help New York City and State restore and rebuild communities that had been devastated by deterioration and abandonment. As a fifty-year-old affordable housing lender with a significant footprint in New York City, CPC is honored to provide testimony today in support of City of Yes for Housing Opportunity and urge this Subcommittee to support these critical zoning reforms that will allow for the creation of a little more housing in every neighborhood.

It is well known and widely accepted that New York City is experiencing a housing crisis, and we are in a critical moment to respond. The 2023 Housing Vacancy Survey (HVS) found a rental vacancy rate of only 1.4%, the lowest this measurement has been since 1968. The HVS also found that nearly all low-income New Yorkers are rent burdened – 81% of households earning less than \$50,000 without rental assistance were rent burdened, paying more than 30% of their monthly income on rent. The picture is even more dire for extremely low-income New Yorkers – 86% of households making less than \$25,000 without rental assistance were extremely rent burdened, spending over 50% of their income on rent. Even for those without rent burden, the current housing market dictated by the City’s zoning code limits their ability to grow their families, age in place, and access jobs, transit, goods, and services. An overly tight housing market necessitates the construction of more housing – yet the combination of New York City’s outdated and overly complicated zoning regulations with entrenched exclusionary practices and NIMBY sentiment has led to insufficient development siloed only to certain neighborhoods. According to the New York Housing Conference, in 2023 ten Community Districts



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produced as much new housing as the remaining forty nine Community Districts combined. This status quo is unacceptable and has materially contributed to the crisis we face today.

To address our housing crisis, we must build a little more housing in every neighborhood – and City of Yes for Housing Opportunity lays out a citywide roadmap to do just that - by comprehensively modernizing the City’s zoning code. This administration’s focus on zoning is grounded in the understanding that zoning is the key to unlocking or blocking development. It can make a neighborhood more inclusive or more exclusive, and more affordable or less attainable. And in that respect, zoning dictates who gets to live where, and which New Yorkers have more or less access to opportunity. New York City’s zoning regulations have not had a meaningful update in roughly 60 years. They were written in a different era for a different city with different housing priorities and challenges than we have today.

City of Yes would update the toolbox of resources available to meet current housing needs and promote more equitable neighborhoods across our city by enabling the construction of more housing of every type appropriate to each community. A little bit more housing in every neighborhood can create the amount of housing New York City needs without necessitating dramatic changes in any one neighborhood.

A common criticism of City of Yes for Housing Opportunity is that it would enable out of scale development and radically alter the fabric and character of existing neighborhoods. It is important to stress that the proposals in City of Yes for Housing Opportunity were crafted specifically to do just the opposite— yes, these proposals will enable specific and targeted changes in what type of development is permitted in each neighborhood, but these changes will be small by design. In low-density neighborhoods, this would look like allowing 2-4 stories of housing above existing ground-floor commercial in town centers, or 3-5 story apartment buildings within half a mile of subway or rail stations where even in the outer boroughs 1-3 story development is already common. In medium- and



The Community Preservation Corporation
220 East 42nd St, 16th Floor
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high-density neighborhoods, City of Yes would introduce Universal Affordability Preference (UAP), which will allow buildings to add at least 20% more housing if the additional homes are permanently affordable at 60% of AMI. For a 40 unit building in a medium density district, this would mean adding 8 more units and likely going from 8 stories to 10 – a change of scale well within the existing neighborhood character. These proposals will increase development only by slim margins on top of what is already allowed, specifically avoiding changes that would bring out of scale development to New York neighborhoods.

City of Yes for Housing Opportunity offers a once in a generation opportunity to modernize our regulations, comprehensively address our housing shortage, and build a city that meets the needs of all its residents. On behalf of CPC, we applaud the Department of City Planning for their tireless work developing City of Yes and we urge this Subcommittee to support City of Yes for Housing Opportunity as it is currently written.

Thank you for the opportunity to testify today and I am happy to answer any questions.



The Community Preservation Corporation
220 East 42nd St, 16th Floor
New York, New York 10017

About CPC

The Community Preservation Corporation (CPC) is a nonprofit affordable housing and community revitalization company that was formed in the early 1970s to help New York City and State restore and rebuild communities which were devastated by deterioration and abandonment. Today, CPC uses its unique expertise in housing finance and public policy to expand access to quality housing, drive down the costs of affordable housing production, advance diversity and equity within the affordable housing development industry, and address the effects of climate change in our communities through the financing of sustainable housing. Since our founding, CPC has invested over \$14 billion to finance the creation and preservation of more than 225,000 units of housing through our lending and investing platforms. CPC is a permanent lending partner to the New York City Retirement Systems (NYCRS) and we are also an equity partner in the PACT Renaissance Collaborative, the team selected by NYCHA to renovate and preserve 16 NYCHA properties located in Manhattan. On behalf of New York State HCR, CPC is also administering the Climate Friendly Homes Program, a \$250 million program to electrify 10,000 units of housing across the state in the next four years.

Most recently, CPC again answered the call to support our government partners in reinvesting in communities following the collapse of Signature Bank. Alongside partners Neighborhood Restore HDFC and Related Fund Management, CPC is leading Community Stabilization Partners (CSP), the manager of a joint venture partnership with the FDIC to manage the rent stabilized portion of now defunct Signature Bank's multifamily commercial real estate portfolio. CPC on behalf of CSP is now the servicer of record for 1,100 buildings encompassing approximately 35,000 units in New York City, the majority of which are rent stabilized. We understand the unique role that rent regulated housing plays in New York City, the distinct financial challenges facing its owners and operators in today's market, and its importance as a haven of affordability to its tenants. As a partner with the FDIC and servicer of the stabilized loan portfolio, CSP and CPC are proud to be preserving the long-term affordability as well as the physical quality and financial stability of these buildings.

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www.communitycp.com

EQUITABLE INFRASTRUCTURE GROUP

“Connecting the players, policies, and projects”

City of Yes for Housing Opportunity
Testimonial Letter to the New York City Council
Subcommittee on Zoning and Franchises,
Hon. Kevin C. Riley, Chair
Friday, October 25, 2024

I am L. Charlie Oliver, founder and chair of the Equitable Infrastructure Group, and I am submitting testimony in opposition to the **"City of Yes, Zoning for Housing Opportunity"** proposal in its present form. Despite its good intentions, the proposal warrants deeper scrutiny and monitoring measures to ensure that it aligns with equitable development and the infrastructure needs of all communities, particularly those historically marginalized and negatively impacted by climate change and poor/overlooked infrastructure.

1. Poor Sewer and Stormwater Infrastructure

Poor sewer and stormwater infrastructure significantly hinders New York City's **"City of Yes for Housing Opportunity"** initiative, aimed at transforming the city into a more sustainable and inclusive urban environment. When sewer systems are outdated or undersized, they become overburdened during heavy rains, leading to widespread flooding and overflow. This not only damages streets and homes, especially in vulnerable neighborhoods, but also causes sewage to mix with stormwater, polluting local rivers and affecting public health. Chronic waterlogging discourages new investment, makes streets less safe, and undermines the livability that "City of Yes" seeks to enhance. Addressing these issues through modernized infrastructure would support healthier communities, reduce costly damages, and align the city with its vision of resilient, equitable urban development.

In 2023, the U.S. Environmental Protection Agency (EPA) announced more than \$256 million in funding for New York, provided through President Biden's Bipartisan Infrastructure Law via this year's Clean Water State Revolving Fund (CWSRF). This funding will support essential upgrades to water, wastewater, and stormwater infrastructure throughout New York, helping safeguard public health and preserve valued water resources. Nearly half of this amount will be offered as grants or principal forgiveness loans, empowering underserved communities nationwide to invest in critical water infrastructure and create well-paying jobs.

In addition, additional federal funding streams, when leveraged correctly, will provide much-needed funding to modernize infrastructure and alleviate the historic burdens bore by NYC's underserved communities. Such opportunities should be presented in conjunction with the rezoning.

The mayor's own words are as follows:

“One year ago, Hurricane Ida brought the heaviest rainfall in our recorded history and flooded our streets, subways, and basements, and, worse, claimed the lives of 13 of our neighbors,” said **Mayor Adams**. “Our neighbors were victims of climate change, which is bringing longer droughts, stronger storms, and heavier rainfall to places all over the globe, but we will not simply stand by and do nothing. We are taking action to protect our city and prevent future tragedies, by ramping up flood protection with sewer advancements and curbside rain gardens, as well as by building out our cloudburst infrastructure and expanding other flood mitigation options, including the bluebelt drainage system. New York City is adapting to the realities of climate change in real-time and doing everything we can to keep New Yorkers safe and honor all that we lost one year ago today.”

Live video: <https://youtu.be/p005UBuQGUC>

Environmental Considerations

Another critical issue is the environmental implications of fast-tracking developments. The initiative lacks sufficient attention to sustainability and resilience, particularly in neighborhoods vulnerable to the impacts of climate change. There are serious concerns that reducing regulatory scrutiny in the interest of expedience could lead to projects that do not prioritize green building standards, stormwater management, or energy efficiency, further burdening communities already bearing the brunt of environmental injustice. We must ensure that new developments not only add housing but also contribute to a greener, more sustainable city.

The proposal decidedly opted for the minimum standard allowed.

The *Incremental Environmental Impact methodology* in the *City of Yes* proposal falls short by isolating changes without fully considering their cumulative environmental impacts. This approach can obscure the broader, long-term environmental consequences of new developments, leading to increased strain on local ecosystems, infrastructure, and air quality. The segmented analysis may neglect how individual projects together contribute to overburdening infrastructure, pollution, and urban heat, ultimately undermining the city's sustainability goals. A holistic environmental review is essential to safeguard the balance between development and environmental preservation, ensuring the city's growth aligns with resilient, eco-conscious practices.

The *Incremental Environmental Impact methodology* often focuses narrowly on changes or impacts directly linked to a single project phase, rather than comprehensively addressing all cumulative, long-term, or interconnected effects.

Here are some common aspects the *Incremental Environmental Impact* methodology may overlook:

1. **Cumulative Impacts:** Incremental analysis may neglect the aggregate effect of multiple projects in an area, resulting in an underestimation of overall environmental strain.
2. **Indirect or Secondary Impacts:** By emphasizing immediate impacts, this approach can miss indirect effects, such as those related to induced development or increased population in surrounding areas.
3. **Long-Term Effects:** Some environmental changes, like habitat loss or greenhouse gas accumulation, may develop over decades. Incremental methodologies may undervalue these long-term outcomes.
4. **Systemic and Network Impacts:** In urban planning, for example, incremental analysis may fail to consider how a single project affects broader systems like transportation, housing, or ecological corridors.
5. **Social and Health Implications:** While environmental aspects are covered, social aspects such as health risks and equity might not receive sufficient consideration, particularly those that arise from subtle, long-term environmental changes.

A more holistic approach better captures these issues, especially in projects with significant environmental or social impact potential, like the "City of Yes" proposal.

Additional *Incremental Environmental Impact* Cons:

1. **Potential for Overlooked Cumulative Impacts:** A segmented approach may overlook cumulative or "big picture" impacts, especially if each increment's impacts seem minor but collectively contribute to significant environmental stress.
2. **Higher Long-Term Costs:** Conducting multiple smaller assessments over time can be more costly than a single, comprehensive study.
3. **Inconsistent Standards:** As assessments occur over time, standards or regulatory requirements may change, leading to inconsistencies in methodology or mitigation practices.
4. **Increased Complexity for Management:** Project managers and regulators may face challenges coordinating various phases, especially when multiple agencies are involved or when environmental factors overlap between project phases.
5. **Uncertainty for Long-Term Planning:** While IEI provides flexibility, it can introduce uncertainty about long-term environmental outcomes, which may affect community support and investment confidence.

Finally, the rapid development encouraged by the "City of Yes" could strain our city's already overburdened infrastructure. From transportation networks to schools, hospitals, and other public services, many areas are already struggling to keep pace with demand. Without a clear and comprehensive plan for infrastructure improvements that match the scale of the proposed developments, this initiative could worsen traffic congestion, overcrowding in schools, and strain on essential services, leading to a decline in the quality of life for all residents.

2. Economic Impact & Gentrification

The "City of Yes" initiative, while aiming to streamline rezoning and development, will serve to exacerbate the existing inequities in our city. This initiative's blanket approach to upzoning and loosening restrictions will accelerate gentrification, especially in low-income and working-class neighborhoods. By encouraging the construction of market-rate housing without adequate safeguards, the initiative will displace long-time residents and local businesses who are already struggling with rising rents and taxes. While the goal of increasing housing supply is critical, without strong provisions for deeply affordable housing, the "City of Yes" will disproportionately benefit developers and wealthier residents at the expense of those who most need stable, affordable homes.

While many comparable zoning initiatives to that of other cities were cited during the City of Yes presentation, the testimonies cherry-picked data – often omitting key findings to the contrary. Moreover, all initiatives as-is within the City of Yes will exponentially apply pressure on existing homeowners to ultimately sell.

3. Deep Affordability

The "City of Yes" proposal, while focused on increasing housing options and simplifying zoning regulations, lacks provisions directly supporting deep affordability, which is essential for lower-income communities. The plan promotes mixed-use and transit-oriented developments, encouraging more market-rate units but without dedicated measures to ensure a significant portion of units are deeply affordable.

One concerning provision is the plan's emphasis on "as-of-right" development flexibility, which simplifies the permitting process for developers but often benefits those focused on higher-rent properties, as these developments are generally more profitable. Moreover, while incentives exist for "affordable housing," they tend to favor moderate-income brackets, leaving low-income households underserved.

Friday, October 25, 2024

Incentives to encourage affordable housing through density bonuses, though present, lack clear mandates for deep affordability thresholds, risking a surge in units that technically qualify as affordable but remain unattainable for those most in need. The lack of specific regulatory mechanisms to mandate units for extremely low-income earners risks undermining the deep affordability goals necessary to address New York City's housing crisis adequately.

4. Community Involvement

The proposal's top-down approach undermines the need for genuine community engagement. Zoning laws and development decisions should be made with the direct input of the communities they impact, ensuring that local voices are not drowned out by powerful developers. While the "City of Yes" promotes growth, it risks reducing the opportunities for community boards and residents to meaningfully weigh in on the character and future of their neighborhoods. Rapid, unchecked development without a nuanced understanding of local contexts can erode the social fabric of diverse communities and continue the Robert Moses-inspired directive of stifling community cohesion.

About Equitable Infrastructure Group

The Equitable Infrastructure Group|Partners (EIG|P) is a private organization promoting fair and resilient infrastructure for the public good. Our main goal is to foster meaningful discussions and take action to ensure the delivery of infrastructure that is both equitable and resilient. Our group utilizes more than a decade of research. This research allows us to closely monitor the key players, projects, and policies within infrastructure development zones, forming the bedrock of our initiatives. Through our efforts, we have contributed to creating national strategies, influencing the trajectory of over \$870 billion in infrastructure investments. Today, EIG|P is deemed the number one source of advancing equity in infrastructure and an indispensable depository of information.

Conclusion

In conclusion, while the "City of Yes" initiative is undoubtedly well-meaning in its goal to spur growth and address housing shortages commendable, it does so in a way that will neglect the long-term needs of the most vulnerable populations. I strongly urge the council to reconsider this proposal and ensure that any future development policies center on equity, sustainability, and well-organized and timed community engagement. Rather than pushing for speed, let us prioritize thoughtful, inclusive development that benefits all New Yorkers, not just a privileged few.

Zoning reform is not key, effective zoning reform with safeguards is key. Perhaps the best remedy is to send back with modifications, and in the interim free up the housing inventory currently being warehoused while moving office-to-residential conversions to the forefront.

Thank you for your time and consideration. If you would require us to clarify our testimony or answer any questions, do not hesitate to contact me directly at 929-823-4700 (mobile).

City of Yes for Housing Council Hearing
Tuesday, October 22, 2024
City Hall Committee Room

Good Evening Chair Riley and members of the committee.

My name is Barbara Blair. I am president of the Garment District Alliance, and I am here to support *the City of Yes for Housing* proposal.

NYC is in desperate need of additional housing. Allowing more commercial to residential conversions is an obvious and important step toward addressing our critical shortage of housing. *The City of Yes for Housing* is a lifeline for the Garment District in west midtown Manhattan because it is imperative that we find new uses to occupy vacant space in our neighborhood's commercial buildings; and to create a safer, 24/7 mixed-use community.

Many property owners in the Garment District are seeing 20—25% vacancies. With post-pandemic changes in work models, including working from home and reduced days in the central business district, many tenants are not renewing leases or have plans to downsize their spaces. Others have even left the district mid-lease due to the dire social conditions on our streets, including drug dealing, drug use and mentally ill individuals in need of services. Without residents, ground floor retail is not viable in many cases because of the limited hours that office tenants keep. These current conditions are untenable.

For the Garment District, easing restrictions on residential conversions will:

- Activate our streets and create a safer, 24/7 environment
- Provide new users to absorb vacant space
- Increase our customer base to support ground floor retail
- Expand opportunities for restaurants to operate during dinnertime and on weekends
- Allow for adaptive reuse of class B and C buildings that are threatened by both office tenants downsizing and the “flight to quality.”

For all these reasons, we are fully supportive of this proposal. For the Garment District to fully realize the opportunity that this zoning change presents, we recommend that the plan include capital improvements that are already enjoyed by other neighborhoods. A dramatically improved streetscape with widened sidewalks on Seventh and Eighth Avenues, bike lanes protected by islands with planted trees, permanent plazas on Broadway, and improved street lighting would all further create conditions for a vibrant mixed use neighborhood.

The City of Yes for Housing addresses a very serious need in the city and, along with capital investment, presents solutions to the many challenges facing the Garment District. Therefore, the Garment District Alliance urges the City Council to accept this proposal.

Respectfully submitted,

SUBCOMMITTEE ON ZONING AND FRANCHISES
PUBLIC HEARING- OCTOBER 22, 2024
WRITTEN TESTIMONY SUBMITTED BY HOUSING AND SERVICES, INC.

Thank you for the opportunity for Housing and Services Inc. ("HSI") to submit written testimony.

Introduction to HSI

HSI has over 38 years of experience as a permanent supportive housing developer and provider. HSI is a 501(c)(3) tax exempt New York State not for profit organization. We provide housing and on-site social services to 625 formerly homeless tenant households residing in four congregate projects in Manhattan and the Bronx. HSI also operates a 100-unit HRA funded scattered site contract for households residing in market-rate private apartments in Upper Manhattan and the Bronx. HSI's congregate projects have HRA/DHS SRO Supportive Services contracts, DOHMH services contracts and HRA/HASA housing and services contracts. All HSI's congregate projects have received significant HPD capital funding.

HSI's staff count is approximately 135, representing about 95 full-time equivalent staff positions.

Acknowledgements:

HSI is a member of the Supportive Housing Network of New York ("the Network"), the statewide advocacy organization for the New York State supportive housing community. As a member of the Supportive Housing Network of New York, HSI fully supports the Network's City of Yes for Housing Opportunity advocacy for this hearing.

HSI is also very grateful for the Yes for Housing Opportunity Coalition's advocacy and analyses work.

HSI fully supports the City of Yes for Housing Opportunity:

HSI fully supports the City of Yes zoning reform as an innovative means to ease the affordable and homeless crisis housing in NYC.

Here are some of the reasons why HSI supports City of Yes:

- The universal affordability preference
- Higher community facility FARs in R6 and R7 districts
- Optional Parking
- Town Center and Transit Oriented Development

- Flexibility: Supportive Housing classification as either residential or community facility
- Quality control: HPD would have discretion to limit supportive housing projects to experienced providers equipped to provide high-quality on-site services to residents.

What is congregate permanent supportive housing:

Permanent supportive housing was pioneered in the early 1980's and has proven to be the most cost effective and humane way to end chronic homelessness.

Permanent supportive housing understands that the homeless typically suffer from mental illness and trauma. Merely providing housing will not address the root causes for their homelessness and, without intensive on-site services, those who are merely housed will inevitably return to homelessness. Like other permanent housing providers, HSI provides case management services to its tenants funded by social services contracts. In case management, tenants referred to HSI housing by its service- contract funders can voluntarily receive services from specifically assigned case managers who work with the tenants to overcome issues that caused their homelessness. Case managers act as a clearing house for each tenant's specific needs. If a tenant suffers from mental illness, the case manager will connect them with a mental health provider. If a tenant wants to overcome addiction, the case manager will connect them with addiction counseling or rehab facilities.

At HSI, social services also include socialization activities to help formerly homeless tenants integrate into their communities. We maintain robust security measures, including 24/7 staffing by at least two front desk personnel and comprehensive closed-circuit security camera (CCTV) systems that monitors both our buildings and the surrounding sidewalks. Front desk staff act as gatekeepers for building access, and are trained as crisis intervention specialists, prepared to assist first responders such as NYPD, FDNY, and EMS.

The relationship between congregate permanent supportive housing and affordable housing within HSI projects:

HSI's four congregate projects have regulatory agreements with HPD that require 60% of the projects' housing units are reserved for the formerly homeless and 40% for persons of low income (60% of AMI) ("community tenants"). The homeless units effectively subsidize the affordable units, enabling HSI to accommodate community tenants with incomes well below 60% of AMI. The HPD regulatory agreements require that all units be rent-stabilized. HSI either provides a project-based rent subsidy or assists tenants in securing tenant-based subsidies for its supportive housing referrals. HSI is happy to accept community

tenants with rent subsidies and is also prepared to assist them in navigating their rent subsidy requirements. In addition, community tenants are entitled to the same case management services that supportive tenants receive, should the community tenants request such services.

The urgent need for more supportive housing:

The need for supportive housing has never been more urgent. According to the most recent HOPE count, 4,042 individuals experienced unsheltered homelessness on the night of January 24, 2023. In addition, over 87,340 individuals are in the emergency shelter system. These numbers highlight the overwhelming demand for housing in New York City, with thousands of New Yorkers left without stable homes each night. While efforts to increase supportive housing availability have made an impact, the gap between supply and demand remains vast. It is crucial that NYC take bold steps now to expand access to permanent, affordable, and supportive housing.

According to the Local Law 3 report recently released by the city, there are more than 9,600 individuals eligible for supportive housing, yet only 2,400 units were available for occupancy in FY24.

We note that currently, NYC bears enormous costs for the unhoused and those persons languishing in the shelter system. Recent studies show that an unhoused person living on NYC streets incurs approximately \$45,000 annually in municipal services (EMS, hospitalizations, incarcerations etc.). The annual cost of a single adult residing within the NYC shelter system is approximately \$49,600. While still primarily government funded, in calendar year 2023, the average all-in cost for an HSI congregate housing unit was approximately \$21,000.

Beyond the unquantifiable cost of human misery, the lack of supportive housing costs NYC millions of dollars in municipal services and payments to shelter providers.

What works for supportive housing in City of Yes:

The Universal Affordability Preference and higher FARS in R6 and R7 districts:

The intensive services required in supportive housing necessitate a critical mass of housing units. HSI's recent analyses have shown that for a 60/40supportive/community housing project comprised of primarily studio apartments for supportive tenants and one-bedroom apartments for community tenants, a minimum of 150 housing units is needed to fund the intensive services. Over the years, HSI has seen many promising sites for development that didn't pencil out as feasible but could have with boosts to FARS.

Optional Parking and Town Center and Transit Oriented Development:

Supportive housing providers apply competitively for NYC 15/15 social services contracts and must demonstrate ready, walkable access to public transportation, grocery and drug stores, and medical centers. Such sites are becoming exceedingly scarce and expensive. City of Yes's Town Center and Transit Oriented Development will open new opportunities for supportive housing providers.

Motor vehicle ownership has never been feasible for virtually all of our tenants, and parking requirements are completely irrelevant to their needs.

Not-for-profits are the solution to community concerns who fear City of Yes's relaxation of zoning requirements will enable for-profit developers who will not provide affordable rents:

HSI shares the concerns of communities who fear that City of Yes's relaxation of zoning requirements will be a windfall for for-profit developers who will provide barely affordable rents and whose motivation is money rather than the wellbeing of the communities they develop and operate in.

HSI's and its peer not-for-profits' motivation is to keep projects affordable in perpetuity.

Sixty percent of AMI is unobtainable for the vast majority of New Yorkers who most desperately need truly affordable housing.

Ninety-six percent of HSI's congregate tenant population meet HUD's definition of extremely low income, and HSI has 35 years of experience in providing affordable housing to New York's lowest-income populations.

While HSI may not share the experiences of its not-for-profit strictly affordable housing peers, engaging with and benefiting the community in which supportive housing operates is an absolute requirement.. Studies by the Furman Institute demonstrate that supportive housing provides significant favorable impacts upon the communities it operates in.

HSI is proud of its engagement with the communities in which it operates. Examples include

- As a Class A property owner, HSI has a seat on the Board of the Flatiron Nomad BID, and an HSI officer has chaired Board committees overseeing the BID's homeless outreach and compliance with the BID's audit compliance with federal and NYS not-for-profit law requirements.
- Our project's extensive security camera system monitoring the bus stop and 94th Street and subway entrance is used extensively by the 24th Police Precinct to investigate incidents and enhance the area's safety.

- HSI has worked closely with its landlord, Harlem CDC, to preserve the neighborhood and worldwide-renowned Minton Playhouse jazz club, a cultural landmark.
- At its newest project, HSI provides meeting space for many Bronx CB 7 board committees including CB 7's Housing, Land Use and Economic Development Committee.

The necessity for not-for-profits to be preferred and competitive in acquiring and developing City of Yes enabled properties:

Not-for-profits have the right mission and motivation to effectively serve the goals of City of Yes. However, their development resources are currently vastly outmatched by those of the for-profit sector. While for-profit developers may meet the technical requirements of City of Yes, they often lack the intent and ultimate goals that guide its mission.

To ensure the successful development of permanent supportive housing, HPD and HRA must be provided with the resources necessary to prioritize and assist not-for-profit organizations in this endeavor.

- HPD staffing levels:
 - Since COVID, the decreased staffing levels at HPD has created a development backlog. The time it takes to get a supportive housing project to construction has more than doubled - from 12-18 months to 24-36 months. This delay is costly to projects and the city. Most not-for-profit developers must borrow to acquire sites, and at today's rates, it is not unusual for projects incur over \$2million in interest to lenders. For-profit developers generally pay cash for sites, and they can therefore acquire sites more quickly than non-profits, saving HPD money. Because of their deep pockets, for-profit developers have an unfair advantage over not-for-profit developers, whose mission and passion are developing and operating supportive housing.
 - Increased staffing at HPD would partially help address this imbalance by getting all projects to construction more quickly and saving HPD money.
- Supportive services funding:
 - Obtaining HPD construction funding is contingent upon evidence of a commitment to social service funding. This is an arduous, competitive, and time-consuming process. The City Council should use its powers to increase the amount of services funding available to supportive housing providers and ensure the smooth flow of funds once the projects are operational.

- HSI, and other supportive housing providers, sometimes wait one to two years to be reimbursed by HRA for services provided under approved contracts. Such delays jeopardize the viability of not-for-profits that operate on razor thin margins.

HSI is encouraged by the Council's support for realigning NYC 15/15 resources away from the production of scattered sites program units and towards the development and preservation of congregate housing projects.

In scattered sites programs, the permanent supportive provider obtains leases in its own name from third-party landlords and places in the leased apartments clients referred to the provider by the contracting government agency. The provider has case managers who make home visits to the clients to address their needs. Scattered sites housing is the ideal solution for formerly individuals who no longer require the intensive on-site services. These individuals seek more independence but need help in maintaining their autonomy in a non-congregate setting.

HSI operates a 100-unit scattered sites program which we believe is a crucial component of the continuum of care to end homelessness. However, as testimony to the scale of the affordable housing crisis and the need for City of Yes, the less than 2% vacancy rate for housing units makes the scattered sites model unfeasible. We have no plans to attempt a 15/15 scattered site program.

We owe the development of our most recent congregate project to NYC's 15/15 congregate housing resources and are eager to use them again for our next project.

While this realignment of existing resources is very encouraging, more resources are required to put not-for-profit developers on equal footing with the for-profit development community.

Summary:

HSI fully supports the City of Yes Initiative and urges the adoption of the Initiative.

Regarding the development aspects of City of Yes, HSI urges the Council to provide preference and resources to not-for-profits who will keep their City of Yes enable projects affordable in perpetuity and will engage positively in the communities they operate in.

[REDACTED]

From: Phyllis Inzerillo [REDACTED]
Sent: Tuesday, October 22, 2024 5:49 PM
To: Testimony
Subject: [EXTERNAL] CITY OF NO

[REDACTED]

My name is Phyllis Inzerillo and I am the co-president of the Howard Beach Lindenwood Civic Association. **We represent over 28,000 people living in Howard Beach in the borough of Queens and our community has come out in overwhelming numbers to say that they are opposed to the City of Yes Housing Opportunity text amendment.**

Howard Beach is a community that consists of 1 and 2 family homes, garden apartments and hi-rise condo and co-ops buildings. Families choose to live in this tight knit community because of its suburban feel with easy access to the city. They did not choose to live in a community that is overburdened with too many people, minimal parking or overdevelopment.

Our community faces significant coastal flooding during weather events and high tides. Challenges that will only get worse over time. **The safety of our residents should be of the utmost importance to everyone including those who designed this plan and recurrent flooding poses a risk to both property and personal safety.** ADUs can put extra stress on existing infrastructure, especially in areas where the drainage systems may already be under pressure during heavy rains or floods. Our flooding history raises questions about the sustainability and safety of new housing units and poses a significant challenge to any development proposal. Our first responders already have difficulty navigating our streets during coastal storm events. This plan is not suitable for our town.

This plan could have easily been broken down to be voted on by our community boards instead of as a city wide change through the existing ulurp process. We suggest that the department of city planning revisit the idea of making these changes on a case by case basis, but if you don't, we want you to know that **Howard Beach is saying NO.** We say NO to more students in our already overcrowded classrooms. We say no to waiting longer for basic infrastructure fixes. We are saying no to housing units on top of the stores on Cross Bay Boulevard. We are saying NO to the people who sit in Manhattan and are trying to tell us what we need in our community. To them we say we need more police officers, more EMS workers, more firefighters, and better laws to protect our families. We need better infrastructure for our sewers and utilities. We need you to correct the flooding issues in our community to keep our residents safe. Get rid of squatters that have taken over homes and let landlords have their homes back and their rents paid. If you want to fix something, fix it from its core.

The City of Yes is an unsafe plan for my coastal community and anyone who votes yes on it is putting all of us in grave danger.

Sincerely,

Phyllis Inzerillo

Co-President

Howard Beach Lindenwood Civic Association



Commitment to Improve the Quality of Life

October 22, 2024

Attn: New York City Council Subcommittee on Zoning and Franchises

Good morning, and thank you Chair Kevin Riley and Subcommittee members for the opportunity for India Home to testify regarding this important issue.

I am here today on behalf of India Home, a Queens-based nonprofit organization dedicated to serving vulnerable South Asian (SA) and Indo-Caribbean immigrant older adults across New York City. Our mission is to improve the quality of life for older adults and help them to age with dignity by providing culturally & linguistically competent social, psychological, recreational, and spiritual services. Since 2007, our organization has served over 5,000 seniors with senior center programs such as culturally sensitive meals, enriching programming including yoga, meditation, educational sessions, health and recreational sessions, creative aging activities, case management services, know-your-rights sessions, technology classes, mental health sessions, and advocacy among others. The organization has established the first of its kind Desi Dementia Day Care (3D Care) program for New York's older adults with low to moderate dementia. Currently the organization is operating two community shared living or "coliving" homes for South Asian older adults in Jamaica and Floral Park.

South Asian seniors are one of the fastest growing groups in NYC. Jamaica, Queens is home to one of the largest SA communities in New York City, inhabited by over 10,000 Bangladeshi (28%) foreign-born residents (Asian American Federation, 2018). Many SA older adults ages 65 and older are struggling to live in overcrowded shared households, facing elder abuse & neglect, and safety concerns (NYC Health, 2021). According to a 2023 report published by the Asian American Federation (AAF), the Asian American senior population in NYC has grown from 125,879 to 168,197 from 2015 to 2020, representing a 33.6% growth rate: the highest among all major racial or ethnic groups. Within this vastly diverse population, South Asian (SA) aging populations are growing at much higher rates than other AAPI groups, with certain SA ethnic groups such as Bangladeshis and Nepalese exhibiting rapidly growing populations due to recent immigration to the country in the last five to ten years. Because of the high population in the Jamaica area, there is a huge need for housing. However, existing housing options that are culturally-tailored and well-suited for these populations are very few in number.

Aristotle, the famous Greek philosopher, once said, "Man is by nature a social animal, and society is something that precedes the individual." This wisdom underscores the fact that, throughout history, humans have lived, worked, and thrived in groups. In modern times, the shared-living model of co-living has gained popularity, especially among millennials, who value community, collaboration, social networking, and shared economies. However, the pandemic starkly highlighted the vulnerability of seniors, many of whom lost life partners and found themselves isolated more than ever before.

178-36 Wexford Terrace Suite 2C Jamaica, NY 11432

Phone: (917) 288 7600 • Fax: (718) 425 0891 • www.indiahome.org • info@indiahome.org

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Mr. Sunil Aggarwal, MS, MBA

Recognizing this, the board and staff of India Home embraced co-living as an ideal alternative living arrangement for seniors. Co-living offers affordability, flexibility, and the chance to form vital social connections. When India Home approached the NYC Department of Housing Preservation and Development (HPD) to develop co-living homes for seniors, they were informed of zoning restrictions that require R5 or above zoning for such projects to qualify for government funding. This posed a significant challenge.

Undeterred, India Home developed two co-living homes in Queens without government funding, relying on support from the community and philanthropic foundations. Notably, the New York Community Trust (NYCT) and the Fan Fox & Leslie Samuels Foundation embraced co-living as an innovative solution for senior housing in a city where housing costs are steep. The elders living in these homes experience a newfound joy, community, and purpose, being in these models. However, the City's support is needed to ensure this model is operationally sustainable.

New York City, known for its diversity and immigrant communities, must consider an inclusive, citywide approach to expanding and diversifying its housing supply. The NYC Aging Commissioner Lorraine Vasquez recently visited our co-living model and has voiced strong support for it to better house our aging immigrant community. To allow for more of such inclusive and effective models, the city must reconsider outdated zoning restrictions and support the development of co-living homes in single-family homes, two-family homes, and apartment buildings, within all zoning districts. This would enable more accessible and community-driven housing solutions for seniors.

Thank you again for your time and consideration. I look forward to continuing the conversation with you regarding these important changes in legislation and the expansion of the co-living model in collaboration with the City.

Sincerely,

A handwritten signature in black ink, reading "Vasundhara Kalasapudi". The signature is fluid and cursive, with a small flourish at the end.

Vasundhara Kalasapudi, Executive Director

India Home, Inc.

City of Yes Housing Opportunity Plan

Good morning, I'm Ed Westley past president of the Jackson Heights Beautification Group and a 20 year member of Community Board Q3.

I am here today to give testimony in opposition to Mayor Adams city wide rezoning proposal Housing Opportunity Plan. Most of Queens concur with 12 out of 14 community boards recommending a no vote.

It would permit building apartment houses where single-family homes are now, without any requirement for parking. Widespread garage and basement conversions under cover of law. Unfortunately, our Borough President did not listen to the voice of the people and supports the plan with conditions. We know that conditions are meaningless and will be ignored if the City Council approves the plan.

I'm worried about parking, perhaps it's a short-term solution with long-term problems. Correct me if I'm wrong but the parking requirements were made to keep cars off public streets.

It seems the new rules will not trump existing covenants or the Landmark's review process, this is important for Jackson Heights and some other neighborhoods in Queens.

Of course, the main target is the one-story taxpayers. It will be easier to buy your tenants out of their leases. Then build residential on top. In the Historic District the developer will still need aesthetic approval from LPC, but outside it, anything goes within that zoning envelope. It will take years, but the days of the one-story taxpayer are numbered.

Once you open new developments up to market forces, the path, pattern and rate will be driven by what yields the best economic return. Certain neighborhoods will feel more of them than others. There seems to be no breaking mechanism if one neighborhood gets more than the allotted new housing.

I am not suggesting discarding everything in the plan. Much of it has a place somewhere just not everywhere. Under Mayor Bloomberg, we saw many rezonings but one neighborhood at a time.

Keeping things local is the best way forward.

I urge the City Council to say no to the City of Yes Housing Plan.

My testimony was gathered from several sources' local newspapers, several workshops and a few fellow JHBG directors.

Thank you for your attention,

Ed Westley



Testimony for the New York City Council's Zoning Committee on the City Of Yes

I'm John Mudd, the Executive Director of Midtown South Community Council, and I've been living in Midtown since 84. The Council has been around just as long. We work with agencies, elected officials, nonprofits, activists, and community, church, and other groups regarding our basic human needs of health, housing, and food.

The housing crisis is decades old and we haven't made any real attempts to resolved it. Our infrastructure is archaic, agencies of oversight understaffed, and response is at a snails pace. Things haven't changed. The City's development policies are largely to blame for the burdening rents, poor health, widening disparity, and increasing homelessness.

Rather than produce the kinds of housing needed, protect our rent controlled and stabilized stock, and bring the 64,000 warehoused apartments onto the market, we're making deals with developers and securing their investments by ensuring development friendly folks are in office, running the Rent Guidelines Board, and sitting on the Community Boards to manufacture consent for their communities.

Case in point, four members of Open New York, a nonprofit funded by Billionaire and co-founder of Facebook Dustin Moskovitz with a purpose to influence elections and develop, have seats on CB4, and on other boards around the city. This "nonprofit" is dubiously appealing for "affordable 'housing and is wedded to the ["YIMBY" \(Yes In My Back Yard\) movement](#)—exists a super pac called Abundant NY. And they are primed to influence elections by funding their political proxies to lift the zoning restraints and simplistically solve the ["New York's housing shortage](#) by increasing the rate of housing production." [Click here for more information](#).

You will also find Open New York folks providing several testimonials for the City Council's Subcommittee on The City Of Yes here today, October 22, 2024.

Agency officials are not protected from stupidity, ideology, or corporate capture. For HPD Commissioner Carrion to laud his agency's "robust partnership" with private industry is appalling, particularly when they have been responsible for pushing extractive plans responsible for our health, food, housing crises.

Our housing policies in general, as with this City Of Yes proposal, serves the developers best interest, and does very little to ease or end the homelessness and the housing crisis (that is a crisis of affordability).

The proponents scream housing crisis often enough and use the term '[affordable housing](#)', which has been bastardized, overused, and misused to serve the real estate industry's marketing goals to coax the public into accepting their schemes.

Land-use and wealth far outweighs public concerns. Rather than wrangle the developer's grips from their stranglehold on this City's land-use and protect our livable, breathable, and healing spaces to give people security and comfort; we're given the City Of Yes, an opportunity for the developers to acquire and commoditize more valuable public space; thereby supercharging the housing crisis.

The plan disguises tax giveaways as incentives, uses a repackaged problematic 421A tax giveaway and a problematic AMI to determine what's affordable; It continues using a dysfunctional voucher system to subsidize landlords, and it has no mandates for the right to housing.—See Samuel Stein, Community Service Society, Housing Policy Analyst, [421A discussion here](#) and [video here](#).

The plan does not account or resolve a variety of infrastructure problems. Many agreed with Councilman Robert Holden's statement, that a proposal "With no infrastructure upgrade plans—such as aging electric grids, deteriorating roads, overwhelmed sewer systems, and under-resourced schools—and recent storms killing people in basement apartments, the last thing we should be doing is pushing forward a rushed plan that most community boards and countless civic associations oppose."

When budgeting a startup business you would consider all the infrastructure needs such as sewers, gas, electric, garbage, transit, and more to run that business inefficiently. Society needs as much consideration. This plan leaves it to the individual and or the municipality to deal with while the developer runs off with the money.

The City Of Yes, with unanswered questions, packaged and marketed as an answer to our housing crisis, is but another wealth extractive plan, that takes advantage during a moment of need—a disaster capitalist approach. The build it and let the free market fix it gimmick was disproven a long time ago. The continual commoditizing of homes will always have the investor looking for more profits at the expense of the renter. This build mentality and let the market resolve the affordable crisis is likely a purposely ignorant ideology to continue extracting wealth from a collapsing economy.

In no way does privatization serve the public. But it gives them power to cost us out of living. Corporate self interest and indifference toward the public is undeniable.

As we speak Related is working to acquire the largest stock of low income housing this nation has produced. This developer, with some of our elected officials support, is planning to end public housing and demolish approximately 4,500 people out of their homes in Chelsea to steal the land beneath them.

Our history of development is our crystal ball, and you don't have to go very far to see our future, starting "with former NYC Mayor Bloomberg's 2008 rezoning failure of Midtown, which allowed the over-saturation of hotels, squashed tenement buildings, and worsened the homeless and housing crisis."

Other examples...

The Hudson Yards development plan "didn't go too well, not from the public's perspective: The shopping mall project hit hurdles commonly associated with mega-projects, including revenue shortfalls, cost overruns and spillovers, as well as revenue lost to tax breaks," according to The New School, Schwartz Center for Economic Policy Analysis. The New York Independent Budget Office highlighted as much, with their analysis of the Hudson Yards financing failure and cost to the public. The Gothamist asked if we would ever see the 4.5 Billion of taxpayer money spent to cover the shortfall; have we? Maybe in spreadsheets or reports validating the financial finagling success to be used for their next adventure?

Furthermore, "the Related Companies, the developer behind Hudson Yards, raked in at least \$1.2 billion," with the help from the Empire State Development (ESD) gerrymandered map qualifying the site for a "controversial investor visa program known as EB-5," that "was designed to lure foreign investment to distressed communities." But "Instead, it subsidizes luxury real estate."

The Governor Hochul's guiding principle and unwavering support for Vornado Realty, Steven Roth's plan to siphon more tax dollars, crush people's homes, and eliminate small businesses in the Penn Station Area, and the indifference for the the public's interest can easily be reasoned—void of integrity—by the generous campaign donations.

The Hochul, Empire State Development Corp (ESD), and Vornado Realty Trust's development plan ignores the housing crisis and the worst vacancy rate and economic downturn of our time to demolish almost 20 million square feet around the Pennsylvania train station, "to bring more commercial property rentals to an already overly commercialized mecca," to complete their "river to river" commercial dream.

Public transit suffers as a result of Hochul's blatant disregard for—[Through-running's viability](#)—a more efficient modern fluid transit system that would afford more convenience, access, and reach to other regions.

The priorities are clear, particularly, when you allow the homelessness conditions to persist with the millions and billions spent on development. You can not rightly say you are developing with the kind of outcomes seen on our streets, hospitals, ERs, food lines, elderly facilities; the cost burdens wear on the public's psyche and destroys them physically, until their earning power is diminished, before being pushed out of their homes and neighborhoods and into nursing homes or worse, the streets.

Our economic system is destroying lives, natural resources, healthcare, housing, food systems, and driving people out of existence. As our economy degrades further, this vulgar system, in its more brutal form, that is participating in the genocide and waring efforts happening overseas, will come to feast more voraciously here at home. It's time to put the monster on a diet. We need to stop allowing corporate to use the City as a piggy bank. We need protections from the laws we make and we need protectorates against the rampaging influences of the corporate class.

People need to be a forethought, not an afterthought. If you truly want this city to be progressive and humane, refuse this plan, mine it for anything of value, don't work within a bubble, and bring the City councils together, with the public advocate, and—equally—the people, with their advocates, experts, nonprofits, and advisors, along for the ride.

In other words, let us grab a little bit of democracy from the oligarchy control to have a more conclusive discussion without private equity and the hierarchical positions already taken, influenced, planned, and already in the works, and going through the optics of inclusiveness (case in point: Fulton and Elliott-Chelsea Houses planned demolition).

Respectfully,

John Mudd

Midtown South Community Council

midtownsouthcc.org





New York City Council Subcommittee on Zoning and Franchises Hearing on “City of Yes for Housing Opportunity”

**Neighbors Together Testimony
Written by Amy Blumsack, Director of Organizing & Policy**

October 22, 2024

Neighbors Together would like to thank the members of the New York City Council Subcommittee on Zoning and Franchises, and the committee chair, Councilmember Riley, for the opportunity to submit testimony on the Mayor’s zoning reform proposal, “City of Yes for Housing Opportunity.”

About Neighbors Together

Neighbors Together is a community-based organization located in central Brooklyn. Our organization provides hot meals five days per week in our Community Café, offers a range of one-on-one stabilizing services in our Empowerment Program, and engages members in community organizing, policy advocacy and leadership development in our Community Action Program. We serve approximately 100,000 meals to over 12,000 individuals per year. Over the past year alone, we have seen a 63% increase in the number of meals we are serving, and we see new people on the line every day.

Our members come to us from across the five boroughs of New York City, with the majority living in central Brooklyn. Nearly 60% of our members are homeless or unstably housed, with a significant number staying in shelters, doubled-up with relatives or friends, and living on the street. Approximately 40% of our members rent apartments or rooms in privately owned homes, or live in rent stabilized units.

Over the last five to ten years, our members increasingly report that homelessness and lack of affordable housing options are their primary concern. Our data backs the anecdotal evidence we see and hear from our members daily: an increasing number of our members are either living in shelter with vouchers for years at a time, ineligible for a voucher, or unable to find permanent housing due to rampant source of income discrimination and a vacancy rate of under 1% for affordable housing units in New York City.

Our Work with Voucher Holders

Neighbors Together has been organizing voucher holders since 2018. We conduct Know Your Rights trainings on how to identify and report source of income (SOI) discrimination, and Housing Search Workshops where voucher holders get additional support in their housing search and assistance on filing source of income discrimination complaints to the City Commission on Human Rights (CCHR) when needed. We work closely with CCHR to ensure that source of income discrimination reports are effective and have the best possible outcomes for our members. We also partner with CCHR on their restorative justice set-aside program to ensure that set-aside units obtained through settlements are most likely to



go to people in need as efficiently and effectively as possible. Additionally, we built and launched the Stop Source of Income Discrimination NYC website, which provides information about source of income discrimination and how to report it as well as a mechanism for reporting via the website.

We have worked closely with Unlock NYC to improve New Yorker's ability to utilize their vouchers. Starting in 2019 our members worked with the Unlock team to design and test an online tool to help voucher holders easily report source of income discrimination. The tool has enabled hundreds of our members to quickly and easily gather evidence and report source of discrimination to CCHR. In our partnership with Unlock NYC, we have released multiple reports on source of income discrimination and voucher efficacy, including "An Illusion of Choice," the SOI mapping tool, the "Serial Discriminators List", as well as ongoing budget advocacy to ensure CCHR is adequately funded to enforce against SOI discrimination.

After over a year of collecting data through the Stop SID NYC website, running know your rights trainings and conducting housing searches for people with vouchers, Neighbors Together built a grassroots organizing campaign of directly impacted people who had voucher shopping letters but couldn't find housing. The VALUE in Housing (**V**oucher **A**dvocates **L**ifting **U**p **E**quity in **H**ousing) campaign created a platform of 5 policy reforms aimed at making vouchers effective tools for accessing permanent affordable housing. Since launching in 2019, the VALUE in Housing campaign has won a significant portion of its platform, including:

- Ensuring that CityFHEPS voucher holders receive know-your-rights information about SOI discrimination upon receipt of their shopping letter
- Increasing the size of the source of income unit at CCHR
- Increasing the payment standard of CityFHEPS to fair market rent
- Improving income requirements for CityFHEPS vouchers so that recipients can increase their income until they are financially self-sufficient without fear of losing their voucher.

Comments on "City of Yes" Plan

The "City of Yes" plan proposes to "address the housing crisis by making it possible to build a little bit more housing in every neighborhood" through rezoning. While there is certainly a clear need for more affordable housing to be built in New York City, "City of Yes" is missing key elements that will address the housing crisis more holistically and help ensure that the city's lowest income New Yorkers will be able to access, and remain in, permanently affordable housing:

- The Universal Affordability Preference (UAP) would allow developers to create 20% more housing if those units are available to households making 60% AMI. However, the population with the greatest need for housing are extremely low income New Yorkers, who make 30% AMI or below. Under the UAP, there is no guarantee that any of the housing built would be available to the



Neighbors Together

people who need it most, nor is there any requirement that developers create affordable housing at all.

- The vacancy rate for housing in New York City has decreased dramatically from 4.5% in 2021 to 1.4% in 2023. For rents in the bottom quartile (under \$1,100 per month), the vacancy rate was a staggeringly low 0.39%, while the vacancy rate for the second quartile (\$1,100 to \$1,650 per month) was 0.91%. Vacancy rates were highest among the top quartile of rents (\$2,400 per month and above), at 3.39%.
- The median income for renters in New York City is 59% AMI. Therefore, half the renters in the city make less than 60% AMI, and even with the Universal Affordability Preference option, at least half the renters will be locked out of any "affordable housing" development that occurs as a result of the "City of Yes."

Recommendations

In order to address the increasing housing and homelessness crisis, the "City of Yes for Housing Opportunity" must do more than reform zoning regulations in New York City. The city must take a holistic approach to ensuring that housing production is equitable and that development is targeted to those who need it most; extremely low income and low income New Yorkers.

To make that possible, Neighbors Together strongly recommends that the City:

- Include mandates for housing targeted to extremely low and very low income New Yorkers.
- Immediately implement CityFHEPS reform laws of 2023.
 - In the current housing and homelessness crisis, the City must do everything it can to preserve affordable housing and keep families stably housed. CityFHEPS as an eviction prevention tool would keep many families from entering the costly shelter system, and would help them remain in apartments whose rents are significantly lower than those currently at fair market rent. Additionally, CityFHEPS vouchers would keep people housed now, while development, even at affordable levels, takes years to increase housing stock.
- Additionally, any new developments created under the "City of Yes" plan should include set-asides for people who are homeless and who have rental assistance vouchers such as CityFHEPS or the Housing Choice Voucher (otherwise known as Section 8).
- Similar to the Certificate of No Harassment Program, landlords and developers who have engaged in SOI and/or other types of housing discrimination should be excluded from accessing building permits and tax breaks. The City cannot address the housing crisis if it turns a blind eye to landlords and developers who are breaking the law.
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- Increase staffing at HRA and Homebase to create faster processing times for voucher packets and renewals
- Invest funding in a functional, easily accessible and transparent online system for voucher holders, their case managers, and landlords to track the status of applications and voucher packet processing.
- Increase funding for the City Commission on Human Rights' Law Enforcement Bureau to effectively combat source of income discrimination against voucher holders as well as other types of housing discrimination.

Conclusion

In order to address the historic homelessness and housing crisis in New York City, Council must demand that any proposed solutions are holistic; rezoning alone will not create housing for those most in need, nor will it decrease homelessness. Without a proper investment in a multipronged approach to addressing the housing crisis, New York City will continue to see increasing numbers of people unable to afford rent and falling into the vicious cycle of homelessness.

For questions regarding this testimony, please contact Amy Blumsack, Director of Organizing & Policy at Neighbors Together, at amy@neighborstogether.org or 718-498-7256 ext. [REDACTED]



Testimony in support of "City of Yes for Housing Opportunity"

City Council Hearing -- October 22, 2024

Thank you to Speaker Adams, Chair Riley, and members of the Subcommittee on Zoning and Franchises for the chance to testify in support of the proposed "City of Yes for Housing Opportunity" text amendment. My name is Annemarie Gray, and I serve as the Executive Director of Open New York. We are a statewide, pro-housing organization with more than 700 volunteer members, many of whom are here today to testify in support of the proposal.

In the next few weeks, Council Members have the opportunity to take a real step forward in addressing the City's dire housing crisis. By passing a strong version of "City of Yes," the Council will enable over 100,000 new homes to be built in New York City over the next decade. While this alone will not solve the housing crisis, there is no other option on the table that will come close to creating as many homes for New Yorkers who are desperate to move out of shelter or want to find a better home for their families.

As Vice President Harris and former President Obama emphasized at this summer's Democratic National Convention, cities like New York must reform its outdated zoning policies in order to bring down the cost of housing and provide real power to residents who are searching for a new home. "City of Yes" is a thoughtful and well-designed plan to do just this. By allowing a little more housing in every community, no neighborhood will be overburdened with new construction, and all neighborhoods will finally contribute to creating a New York where housing is more abundant.

While this proposal has seemed controversial at times throughout the extensive public engagement process, I urge you to not be misled into believing that the loudest and most oppositional voices are representative of the majority of New Yorkers who are struggling with housing costs and supportive of impactful solutions.

A poll of 900 registered and likely voters released yesterday makes it clear that New Yorkers are waking up to the consequences of decades of underbuilding. The results show that 81% of voters support "City of Yes," and each of the plan's core components poll between 73% and 80% support. 75% of New York City voters said they are more likely to support candidates for elected office who vote for this proposal. I have attached a copy of these poll results to my testimony.

For far too long, many of the most well-resourced parts of the city have said "no" to all forms of new housing, contributing not only to the overall housing supply crisis, but also to deeply



inequitable patterns of development that reinforce long-standing patterns of segregation. As many of you know, this year's Housing Tracker Report from the New York Housing Conference showed that over the last ten years just one Council District – District 17 in the Bronx – produced more new affordable housing units than the bottom 21 districts.

"City of Yes" will update our zoning rules to meet the needs of New Yorkers in a more equitable way, allowing more housing of every type in every neighborhood. This means more income-restricted workforce housing, more backyard cottages to support homeowners, and more of the cheapest forms of housing to get New Yorkers out of our shelter system and onto their feet. In order to execute the fair housing goals of the proposal, the policies that would unlock new housing in low-density districts must not be cut in final negotiations.

Of course, zoning changes are necessary but not sufficient to solving the housing crisis. To ensure that we are protecting tenants and anyone struggling with housing insecurity, we must pair "City of Yes"'s reforms to the Zoning Resolution with additional actions that will bolster fair housing, support the neighborhoods most likely to be impacted with new government resources and investments, and prepare city agencies to support low-income homeowners. We strongly support the Speaker and Council in your efforts to secure additional commitments that will push forward even more comprehensive solutions to our housing crisis.

Thank you for the opportunity to speak today. We look forward to working with the Council to pass "City of Yes."

City Council Hearing on City of Yes for Housing Opportunity

October 22, 2024

Testimony of Patricia O. Loftman, President Park West Village Tenants Association Rafael Salamanca Jr., Chair

Greetings Chairperson Salamanca and members of the New York City Council Committee on Land Use. Thank you for this opportunity to provide testimony on the topic of The City of Yes For Housing Opportunity.

My name is Patricia Loftman. I am President of the Park West Village Tenants Association located on the Upper West Side of Manhattan. I speak in opposition to this proposal.

The proposed COY is simply a deregulation of the current zoning rules. The public is told that the proposed goal of COY is to address the current housing crisis. I maintain that a housing crisis does not exist. A housing affordability crisis exists. This is the legacy of the deregulation of over 400K rent stabilized apartments lost during the past 20 years. Were those apartments still in existence there would neither be a housing crisis or an affordability crisis. Under the COY, developers will be permitted to build market rate and luxury apartments wherever and whenever they want creating residentially segregated communities. We only need to look at Robert Moses's legacy to understand what this will look like. Under COY, there is no provision for prioritizing affordable housing. And why should there be? This proposal was written by The Blast Committee, a group including developers, construction interests', donors and loyalists to Mayor Adams.

Over the weekend, the City Planning Commissioner, Mr. Garodnick was heard, on the radio saying that the 500K residents who fled New York for other US destinations were middle-class, not the poor and that housing was a major reason. This was in response to concerns voiced that COY would not prioritize affordable housing. Thus, it is postulated that COY would address the housing needs of this group of residents – the middle class. I would be interested to know Commissioner Garodnick's definition of both affordable and middle class. I consider myself middle class. I am frugal. Yet, with my pension and social security I could not afford to move to existing new housing or housing created under COY. The housing that would be built under COY would not help those former middle-class residents who fled NY. It is my rent stabilized apartment that affords me the ability and stability to remain in my home and continue to reside in NYC. Housing provides physical, emotional and psychological stability. When one investigates social determinants of health, housing is central to good health.

For us at Park West Village, zoning currently permits community facility uses up to 6.5 FAR on our lot, which is much higher than the amount used for residential purposes. It's nearly impossible to use that floor area, because most of our lot is required to be "residential open space," which can include both green space and parking. That open space on our lot is a zoning requirement, it is not a development site under current zoning. COY allows infill development to *ignore* the "residential open space" requirement. Instead, developers just need to keep at least 50% of the lot open. Most developments like ours are around 25% building and around 75% open space. If COY gets rid of the residential open space requirement, that

means about 25% of a lot like ours can be developed as the developer sees fit. COY also changes the space needed for legal windows and yards and courts, so that developers can put new buildings closer to existing buildings than current zoning permits. Under COY, infill could be a community facility building that they could not fit previously. Infill could be a new residential building that they can build because they now have more residential FAR. Or a developer could mix the uses of the same building. The COY would provide the owner with *many* more options. The owner could construct taller and larger buildings for market rate and luxury tenants at the expense of the residents of existing buildings who currently have access to light, air and open space under the current zoning regulations.

The COY proposals will also have a severe impact on our community by failing to address key quality-of-life issues. As population density increases, existing infrastructure will be unable to ensure clean water and power, or provide sanitation services, sewage disposal, educational and policing resources to our neighborhood. Public transportation will become overloaded with more adults traveling to work and children traveling to school. Increased traffic resulting from tenants' vehicles will result in congestion, and compromise air quality and pedestrian safety. COY also overlooks elements that nourish healthy urban living: both mental and physical health are challenged when open spaces, fresh air, and light, are diminished. Experiencing the natural world during daily living educates and sustains children and adults alike. The guardrails that protect these fundamental resources are removed when COY favors developers over residents.

For all the above reasons it is my hope that my CM Shaun Abreu will accede to the will of his constituents and vote no on COY.

To: Interested Parties
From: Slingshot Strategies
Date: October 18th, 2024
Re: City of Yes for Housing Opportunity Polling

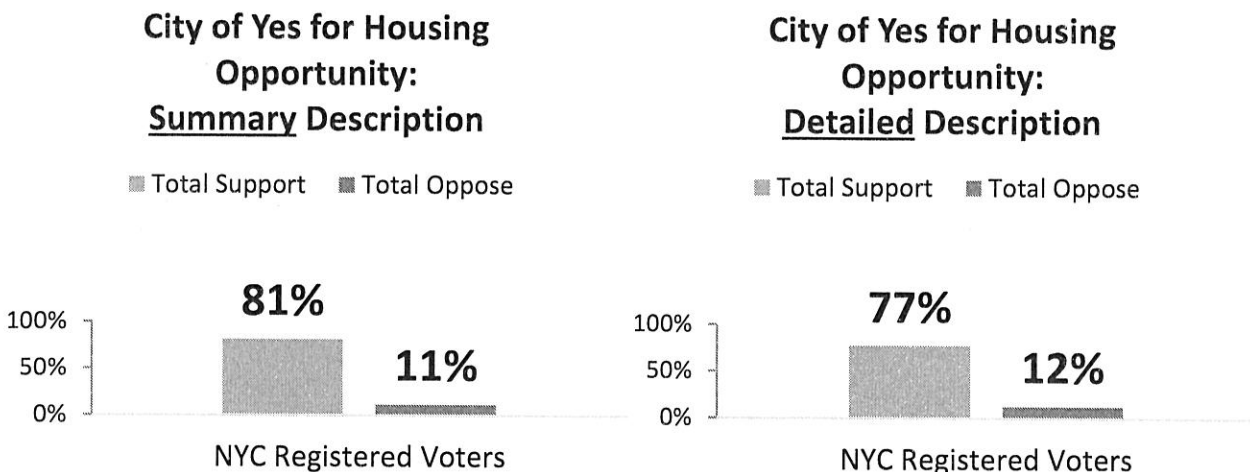
Executive Summary

Slingshot Strategies conducted a poll of 900 registered voters in New York City from October 11th to October 15th, 2024, focusing on housing supply and affordability generally, and the City of Yes for Housing Opportunity proposal specifically. We explicitly tested the policy language in use by the New York City Department of City Planning to describe City of Yes for Housing Opportunity and its policy components.

Our polling surveyed a random representative sample of 500 registered voters across New York City, as well as 100-voter oversamples in the following areas:

- Southeast Queens, including Council Districts 27, 28, and 31;
- The South Bronx, including Council Districts 16, 17, and the Bronx portion of 8;
- South Brooklyn, including Council Districts 38 and 43;
- Central Brooklyn, including Council Districts 37, 40, 42, and 45;

Our polling found that the City of Yes Housing Opportunity proposal **enjoys strong support amongst New Yorkers citywide, and robust support regionally**. Initial support for a summary of the policy package is at 81% citywide, and a detailed explanation of the City of Yes policy agenda garners the support of 77% of voters citywide.



In the regions we oversampled, the South Bronx has the strongest levels of support at 92%. Central Brooklyn and Southeast Queens track close to citywide support levels at 77% and 79% support respectively. Support for City of Yes in South Brooklyn was similarly high at 74%.

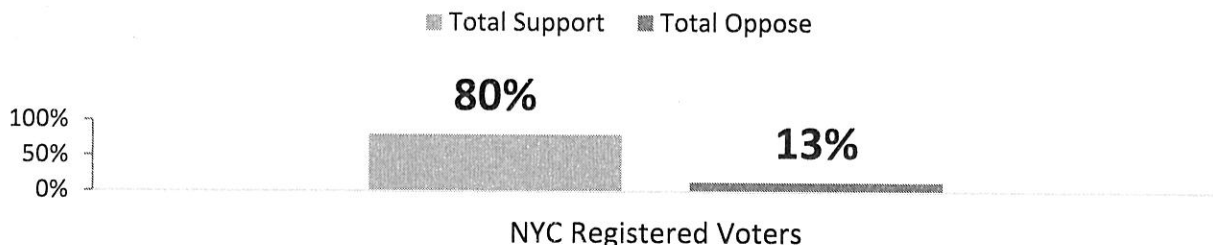
CITY OF YES FOR HOUSING OPPORTUNITY: SUMMARY	SUPPORT	OPPOSE	NET
Citywide	81%	11%	+70
South Bronx (CDs 8, 16, 17)	92%	5%	+87
Southeast Queens (CDs 27, 28, 31)	79%	14%	+65
Central Brooklyn (CDs 37, 40, 42, 45)	77%	7%	+70
South Brooklyn (CDs 38, 43)	74%	14%	+60

Individual City of Yes policy measures garner between 73% and 80% support from voters, **indicating broad approval for each policy plank**, with proposals for ADUs and commercial conversions ranking highest in terms of support at 80%, while small and shared apartments come in on the low end (73%) when it comes to voter preference.

CITY OF YES POLICY PROPOSALS	SUPPORT	OPPOSE	NET
Convert Non-Residential	80%	12%	+68
Accessory Dwelling Units	80%	12%	+68
Transit-Oriented Development	79%	11%	+68
Town Centers	79%	12%	+67
District Fixes	79%	12%	+67
Universal Affordability Preference	78%	12%	+66
Campus Infill	74%	14%	+60
Parking Mandates	74%	17%	+57
Small And Shared	73%	17%	+56

In our final test after a summary description, details, and individual policy descriptions, **an overwhelming majority of voters support the City of Yes package 80% to 13%.**

"Based on everything you have heard do you support or oppose the City of Yes for Housing Opportunity proposal?"





Testimony of

The Legal Aid Society, Coalition for the Homeless, Community Service Society, and Voices Of Community Activist and Leaders (VOCAL-NY)

**Regarding Application Number N 240290 ZRY
(City of Yes Zoning for Housing Opportunity)**

Before the New York City Council Subcommittee on Zoning and Franchises

October 24, 2024

Introduction

Thank you to Chair Riley and the New York City Council Subcommittee on Zoning and Franchises for holding this very important hearing. The Legal Aid Society, Coalition for the Homeless, Community Service Society, and VOCAL-NY welcome this opportunity to submit comments concerning the City's efforts to expand housing opportunities for New Yorkers by allowing for more housing to be built in areas that are underutilized. Housing development has long lagged behind the population growth. While we commend the articulated objective of addressing the City's vast housing challenges and agree that more housing should be constructed in areas that are underutilized, an effective plan should address the most acute housing needs and target the most vulnerable.

Declining Affordability of Housing

Many New York City renters are facing dire circumstances. In the face of fewer rental opportunities and higher prices, renters are suffering from a growing disparity between what they can afford and their actual rent. According to the New York City Housing and Vacancy Survey (NYCHVS), the median rent for New York City renters in 2023 was \$1,641.¹ In addition, between 1993 and 2023, there was a net loss of over 600,000 units renting under \$1,500 and a net gain of over 75,000 units with rents of \$5,000 and more.² The median renter income is \$70,000,³ yet 25 percent of renter households earn less than \$25,000 and 15 percent earn between \$25,000 and \$49,999. As a result, for half of New York City's renter households, those earning under \$70,000, the typical renter is severely rent burdened.⁴ Further, among households earning less than \$25,000 a year who do not live in public housing or report having a voucher, an astonishing 86 percent are severely rent burdened.⁵ This situation is compounded by the fact that, according to the NYCHVS, in 2023, there were 33,210 apartments vacant and available to rent.⁶ Of that number, only 4,442 apartments, or 13 percent, were affordable to New Yorkers earning less than \$50,000 a year.⁷ Only 12,500, or 37 percent, were available to New Yorkers

¹ Gaumer, E. *The 2023 New York City Housing and Vacancy Survey: Selected Initial Findings*. New York, NY: New York City Department of Housing Preservation and Development; 2024. Page 13.

<https://www.nyc.gov/assets/hpd/downloads/pdfs/about/2023-nychvs-selected-initial-findings.pdf>

² *Id.* at 19.

³ *Id.* at 42. There was a large increase in the median household income which was driven by the huge influx of higher income households coming into New York City. "

⁴ *Id.* at 55.

⁵ *Id.* at 57.

⁶ Gaumer, E. *The 2023 New York City Housing and Vacancy Survey: Selected Initial Findings*. New York, NY: New York City Department of Housing Preservation and Development; 2024. Page 26.

<https://www.nyc.gov/assets/hpd/downloads/pdfs/about/2023-nychvs-selected-initial-findings.pdf>

⁷ *Id.*

earning under \$100,000 a year.⁸ In fact, the median income a household would need to afford one of the vacant apartments is somewhere between \$100,000 and \$150,000 a year, far above the median household income of \$70,000 and out of reach for households who experience the most severe rent burden.⁹ Needless to say, the clients of The Legal Aid Society and the Coalition for the Homeless and VOCAL-NY members cannot afford these rents.

The Petitioners in the matter *Vincent v. Adams*¹⁰ are illustrative of the vulnerable populations that need access to rental assistance. Plaintiff CT, for example, struggles to keep herself and her daughter housed after a significant injury rendered her unable to work. Under current rules, her disability income automatically disqualified her for the FHEPS rent supplement. However, her Social Security Disability Insurance (“SSDI”) income of \$1,213 per month is less than her \$1,254.60 per month rent. She is eligible for a voucher under the City Fighting Homelessness and Eviction Prevention Supplement (CityFHEPS) Reform Laws that the City Council passed, but she faces eviction from her Bronx apartment because the City refuses to implement the law. Similarly, Petitioners MC and SA are both elderly tenants with relatively low rents of \$1,006 and \$1062.33, respectively. However, these rents also exceed their incomes, and they are unable to pay the rent for the homes they have long resided in because the City refuses to implement the law that was passed to give them access to the critical lifeline that is CityFHEPS.

Households such as the *Vincent* Petitioners face the prospect of shelter and virtually no chance of finding a new apartment whose rent is as low as their current rent. If they are able to

⁸ *Id.*

⁹ *Id.*

¹⁰ Index No. 450563/2024

secure a voucher as a result of being in shelter, the rent will be much higher and will cost the City a great deal more. In many cases, such a household may be forced to relocate outside of the City. The direct correlation between household income and whether a household is able to remain in New York City is becoming increasingly apparent. In fact, between 2021 and 2023, there has been a 2-point loss in the number of NYC households earning between \$50,000 and \$99,999, 3-point loss of households earning \$25,000 to \$49,999 and 5-point loss of households earning less than \$25,000.¹¹

Unfortunately, affordability does not seem to be a prominent feature of the proposed zoning plan. It certainly does not address the affordability crisis that plagues the lowest-income New York City households. We are concerned that the housing units that will be developed under the proposed zoning plan will be beyond the financial reach of low-income individuals and families. This raises critical apprehensions regarding the plan's capacity to adequately serve the socioeconomic diversity of New York City residents, ultimately jeopardizing the availability of affordable housing options for those who are most in need.

For example, the Universal Affordability Preference would allow builders to add 20 percent more units if those units are affordable to households earning 60 percent of the Area Media Income (AMI). Currently, 60 percent of the AMI for a household of one is \$65,220 per year and \$74,580 for a household of two.¹² This approach will leave out wide swaths of households that do not meet this income requirement and for whom the need is most acute. The zoning plan should include low-income New Yorkers such as those who are eligible for or

¹¹ *Id.* at 42-43

¹² <https://www.nyc.gov/site/hpd/services-and-information/area-median-income.page>

already participating in the Section 8 Housing Choice Voucher Program (HCV program). A one-person household cannot earn more than \$54,350 and a two-person household cannot earn more than \$62,150 per year to be income eligible for the New York City Housing Authority (NYCHA) administered Section 8 program.¹³ When NYCHA recently reopened the waitlist for the HCV program for the first time in nearly 15 years,¹⁴ over 630,000 households applied within a single week. Such a response demonstrates the vast scale of need for this program and the number of households who will not benefit from the Universal Affordability Preference. For the New York City funded and administered CityFHEPS rental assistance program, a household of two must earn no more than \$40,880.¹⁵ The high demand for this program likewise demonstrates the need for housing that is affordable to the lowest income households, and that the Universal Affordability Preference criteria will not create more housing that is affordable to the households that need it most.

Declining Housing Availability

Unfortunately for New York City renters, declining affordability is coupled with declining availability. New York City remains in a housing emergency. The number of vacant units affordable to low-income New Yorkers is meager. According to the most recent NYCHVS, New York City's net rental vacancy rate is 1.41 percent.¹⁶ This is not only one the lowest recorded vacancy rates since 1968, but also a sharp drop from the previous 2021 rate of

¹³ <https://www.nyc.gov/site/nycha/section-8/applicants.page>

¹⁴ <https://www.nyc.gov/office-of-the-mayor/news/390-24/mayor-adams-nycha-will-accept-section-8-housing-choice-voucher-applications-first>

¹⁵ [https://www.nyc.gov/assets/hra/downloads/pdf/cityfheps-documents/DSS-7n-\(E\).pdf](https://www.nyc.gov/assets/hra/downloads/pdf/cityfheps-documents/DSS-7n-(E).pdf)

¹⁶ <https://www.nyc.gov/assets/hpd/downloads/pdfs/about/2023-nychvs-selected-initial-findings.pdf>

4.54 percent and well below the 5 percent threshold needed for declaration of an emergency. The picture is even more dire for the “very low rent” apartments (rents less than \$1,100), for which the vacancy rate in 2023 was only 0.39 percent.¹⁷ The 2023 vacancy rate for units between \$1,100 and \$1,649 was no better at 0.91 percent. The vacancy rate for units between \$1,650 and \$2,399 was a frightening 0.78 percent.

This decline in availability extends across all the housing stock in which middle- and low-income households reside. There remain only 77,000 units covered by either the Mitchell-Lama program or the federally subsidized Project-Based Section 8 program. This is a loss of 35 percent since 1990.¹⁸ This combination of market forces and governmental decisions has worked together to have a devastating effect on low- and moderate-income New Yorkers.

The declining number of vacant units available for rent, the fact that housing expansion has not kept pace with population growth, and the ongoing public housing crisis have all contributed to the scarcity of available affordable housing.

Safe Affordable Housing is Critical for Individual Wellbeing and New York City's Economic Recovery

Safe, affordable housing is critical. When families have stable housing, it leads to better outcomes in health, education, and employment. Housing instability has been linked to greater

¹⁷ Gaumer, E. *The 2023 New York City Housing and Vacancy Survey: Selected Initial Findings*. New York, NY: New York City Department of Housing Preservation and Development; 2024. Page 21.

<https://www.nyc.gov/assets/hpd/downloads/pdfs/about/2023-nychvs-selected-initial-findings.pdf>

¹⁸ Oksana Miranova, *Closing the Door: Subsidized Housing at a Time of Federal Instability*, Community Service Society, March 2018. https://smhttp-ssl-58547.nexcesscdn.net/nycss/images/uploads/pubs/Closing_the_Door_FINAL_WEB.pdf

risk of depression,¹⁹ worse outcomes for chronic illnesses like diabetes,²⁰ low-weight and/or preterm infants,²¹ and general adverse childhood health.²² Frequent moves before a child is seven years old lead to greater thought-related and attention-related problems.²³ These problems can reduce educational achievement. Children who experience high mobility between third and eighth grades do worse in school.²⁴ Forced moves are also a predictor for job loss.²⁵ If keeping employment without stable housing is difficult, finding new employment while unstably housed is even more difficult. The cost of adverse health outcomes, poor educational achievement and lack of employment is significant and will ultimately harm New York State's ability to grow its economy.

¹⁹ Burgard, S. et al, *Housing Instability and Health: Findings from the Michigan Recession and Recovery Study*, Social Science & Medicine, December 2012.

<https://www.sciencedirect.com/science/article/abs/pii/S0277953612006272?via%3Dihub>

²⁰ Berkowitz, et al. *Unstable Housing and Diabetes-Related Emergency Department Visits and Hospitalization: A Nationally Representative Study of Safety-Net Clinic Patients*, 2018

<https://pubmed.ncbi.nlm.nih.gov/29301822/#:~:text=Conclusions%3A%20Unstable%20housing%20is%20common,for%20vulnerable%20individuals%20with%20diabetes.>

²¹ Leifhart, et. al, *Severe Housing Insecurity during Pregnancy: Association with Adverse Birth and Infant Outcomes*, Int J Environ Res Public Health. 2020, <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC7700461/>

²² Sandel, et al, *Unstable Housing and Caregiver and Child Health in Renter Families*, Pediatrics, 2018, <https://publications.aap.org/pediatrics/article/141/2/e20172199/38056/Unstable-Housing-and-Caregiver-and-Child-Health-in>

²³ Gaylord, et al., *Impact of housing instability on child behavior at age 7*, Int J Child Health Hum Dev., 2018, <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC8442946/>

²⁴ Cutuli, et al, *Academic achievement trajectories of homeless and highly mobile students: Resilience in the context of chronic and acute risk*. Child Development 2013. https://www.researchgate.net/profile/Jeffrey-Long-6/publication/24250390_Academic_achievement_of_homeless_and_highly_mobile_children_in_an_urban_school_district_Longitudinal_evidence_on_risk_growth_and_resilience/links/5c9b85c2a6fdccd4603f111c/Academic-achievement-of-homeless-and-highly-mobile-children-in-an-urban-school-district-Longitudinal-evidence-on-risk-growth-and-resilience.pdf

²⁵ Desmond, et al, *Housing and Employment Insecurity among the Working Poor*, Social Problems, 2016. <https://scholar.harvard.edu/files/mdesmond/files/desmondgershenson.sp2016.pdf?m=1452638824>

Recommendations

We recommend that the City:

- Immediately implement the CityFHEPS expansion as passed into law by the New York City Council in 2023. This would allow families and individuals in shelter to seek permanent affordable housing and allow households facing eviction to remain in their homes and, in many cases, avoid having to even appear in the already overburdened housing court. The Legal Aid Society represents several tenants in *Vincent*²⁶ who, like those described above, cannot meet their needs with their current income that, in some cases, is the same as the monthly rent. A voucher would make their rent obligation affordable. They would not have to live under the perpetual specter of displacement. They would not have to consider foregoing other basic needs to pay their monthly rent.
- Require that the additional housing units added to buildings using the Universal Affordability Preference be available to high-need households, particularly those that are eligible for vouchers such as Section 8 and CityFHEPS. In addition, these units should be set aside for voucher holders to facilitate their entry into permanent housing, particularly in light of the rampant and largely unchecked discrimination that they face as voucher holders in the rental market.²⁷
- While the zoning program primarily presents Accessory Dwelling Units as a means of accommodating growing families or allowing older people to live closer to family members and caretakers, the units could also be made available to other tenants. Before

²⁶ Index No. 450563/2024

²⁷ <https://www.nytimes.com/2021/03/15/nyregion/real-estate-lawsuit-section-8-discrimination.html>

this is the case, the City should include strong tenant protections and capital investments as part of the Accessory Dwelling Unit program, and other proposals necessary to legalize basement and cellar apartments, ensuring that the most vulnerable households are served. One way the City could achieve this goal is to establish a program under which property owners are provided with low-interest or forgivable loans for such capital investments conditioned on commitments to lease the Accessory Dwelling Units to CityFHEPS or Section 8 voucher holders or other individuals earning 80% or less of the area median income for a minimum of ten years.

- Increase funding for development and preservation of permanently and deeply affordable housing, through programs like Open Door and Neighborhood Pillars.
- Implement a tenant/non-profit right of first refusal framework like the Community Opportunity to Purchase Act (COPA), paired with permanent affordability, to combat any potential speculation resulting from changes to the city's zoning code.
- Invest in tenant protections, including additional funding for Right to Counsel and Source of Income (SOI) Discrimination enforcement.
- Investing in a fully funded, permanent, Anti-Harassment Tenant Protection (AHTP) program as a necessary part of any effort to protect, reclaim, and expand affordable housing in New York City. AHTP is currently the only City housing program that provides legal representation to tenants in buildings converting to low-income, limited equity HDFC coops and to shareholders in low-income limited equity coops. AHTP provides tenants with access to justice and legal resources for affirmative and preventive services, diverting eviction cases from being brought to court and preserving and

improving the quality of the affordable housing stock. AHTP also promotes and supports community education for tenants, assistance for tenants experiencing harassment and housing discrimination, and aids tenants who challenge unlawful rent increases and illegal deregulation and/or losses of affordable housing.

- NYCHA holds a key to unlocking billions in potential revenue through the sale of Transferable Development Rights (TDRs). With 78 million square feet of unused development rights, NYCHA has a golden opportunity to revitalize its infrastructure and ensure the sustainability of public housing in NYC. However, current policies severely limit the ability to leverage these assets. NYCHA developments are too far from viable sites to receive their air rights under current policy. And when they do, because there is no competition, rights are sold at a discount hurting the agency and residents. Over 98 percent of NYCHA developments are landlocked, unable to utilize their TDRs effectively, highlighting the need for a citywide, as-of-right framework for TDR transfers. By expanding TDR transferability within a half-mile radius, NYC could unlock all unused development rights, generating between \$4.2 to \$8.4 billion. This is badly needed funding that could address a major backlog in capital funding. The City of Yes prioritizes increasing housing supply in NYC and includes an expansion of TDR for landmarks, but leaves NYCHA residents behind. We recommend the creation of a plan by DCP to review and submit zoning language that expands TDR for NYCHA campuses.

While our recommendations ensure that the City of Yes for Housing Opportunity centers on affordability and tenant protections, there are many important features in the proposal that should not, under any circumstances, be compromised or watered down. These include:

- Ending mandatory parking minimums in new housing construction;
- Enabling the construction of housing on commercial "main streets" in low-density areas;
- Making density bonuses available for new affordable housing built anywhere in the city, as is already the case for senior housing; and

Addressing affordability issues in addition to making changes to the zoning code. The Council's negotiations should add to, rather than subtract from, the current proposal.

Conclusion

Thank you for the opportunity to submit testimony before the New York City Council Subcommittee on Zoning and Franchises. We hope that the City will prioritize the needs of the most vulnerable in this overheated rental market.

The Legal Aid Society

The Legal Aid Society (Legal Aid) is the nation's oldest and largest not-for-profit legal services organization. Legal Aid provides comprehensive legal services in all five boroughs of New York City for people who cannot afford to pay for private counsel. Since 1876, Legal Aid has advocated for low-income families and individuals and has fought for legal reform in City, State, and federal courts across a variety of civil, criminal and juvenile rights matters. Legal Aid takes on 200,000 cases annually, including thousands of cases in which we fight for the rights of tenants in regulated and unregulated apartments across the city. Legal Aid also takes on law reform and appellate cases, the results of which benefit more than 1.7 million low-income New Yorkers; the landmark rulings in many of these cases have a state-wide and national impact.

Coalition for the Homeless

The Coalition, founded in 1981, is a not-for-profit advocacy and direct services organization that assists more than 3,500 homeless and at-risk New Yorkers each day. The Coalition advocates for proven, cost-effective solutions to address the crisis of modern homelessness, which is now in its fifth decade. The Coalition also protects the rights of homeless people through litigation involving the right to emergency shelter, the right to vote, the right to reasonable accommodations for those with disabilities, and life-saving housing and services for homeless people living with mental illnesses and HIV/AIDS.

The Coalition operates 11 direct-services programs that offer vital services to homeless, at-risk, and low-income New Yorkers. These programs also demonstrate effective, long-term, scalable solutions and include: permanent housing for formerly homeless families and individuals living

with HIV/AIDS; job-training for homeless and low-income women; and permanent housing for formerly homeless families and individuals. Our summer sleep-away camp and after-school program help hundreds of homeless children each year. The Coalition's mobile soup kitchen, which usually distributes 800 to 1,000 nutritious hot meals each night to homeless and hungry New Yorkers on the streets of Manhattan and the Bronx, had to increase our meal production and distribution by as much as 40 percent and has distributed PPE and emergency supplies during the COVID-19 pandemic. Finally, our Crisis Services Department assists more than 1,000 homeless and at-risk households each month with eviction prevention, individual advocacy, referrals for shelter and emergency food programs, and assistance with public benefits as well as basic necessities such as diapers, formula, work uniforms, and money for medications and groceries. Since the pandemic, we have been operating a special Crisis Hotline (1-888-358-2384) for homeless individuals who need immediate help finding shelter or meeting other critical needs.

The Coalition was founded in concert with landmark right-to-shelter litigation filed on behalf of homeless men and women (*Callahan v. Carey* and *Eldredge v. Koch*) and remains a plaintiff in these now consolidated cases. In 1981, the City and State entered into a consent decree in *Callahan* through which they agreed: "The City defendants shall provide shelter and board to each homeless man who applies for it provided that (a) the man meets the need standard to qualify for the home relief program established in New York State; or (b) the man by reason of physical, mental or social dysfunction is in need of temporary shelter." The *Eldredge* case extended this legal requirement to homeless single women. The *Callahan* consent decree and the *Eldredge* case also guarantee basic standards for shelters for homeless men and women.

Pursuant to the decree, the Coalition serves as the court-appointed monitor of municipal shelters for homeless single adults, and the City has also authorized the Coalition to monitor other facilities serving homeless families. In 2017, the Coalition, fellow institutional plaintiff Center for Independence of the Disabled – New York, and homeless New Yorkers with disabilities were represented by Legal Aid and pro-bono counsel White & Case in the settlement of *Butler v. City of New York*, which is designed to ensure that the right to shelter includes accessible accommodations for those with disabilities, consistent with Federal, State, and local laws. During the pandemic, the Coalition worked with Legal Aid to support homeless New Yorkers, including through the *E.G. v. City of New York* Federal class action litigation initiated to ensure Wi-Fi access for students in DHS and HRA shelters, as well as *Fisher v. City of New York*, a lawsuit filed in New York State Supreme Court to ensure homeless single adults gain access to private hotel rooms instead of congregate shelters during the pandemic.

Voices Of Community Activists & Leaders (VOCAL-NY)

Voices Of Community Activists & Leaders (VOCAL-NY) is a statewide grassroots membership organization that builds power among low-income people affected by HIV/AIDS, the drug war, mass incarceration, and homelessness in order to create healthy and just communities. We accomplish this through community organizing, leadership development, advocacy, direct services, participatory research and direct action. VOCAL-NY is building a movement of low-income people dedicated to ending the AIDS epidemic, the war on drugs, mass incarceration, and homelessness. We fight for systemic change rooted in justice, compassion, and love. We approach this work with a firm belief in reducing harm and ending stigma, and the knowledge that the issues impacting our communities are driven by institutional oppression, not personal

failings. Our campaigns have saved or improved the lives of hundreds of thousands of New Yorkers across the state.

Community Service Society of New York

The Community Service Society of New York (CSS) has worked with and for New Yorkers since 1843 to promote economic opportunity and champion an equitable city and state. Through a strategic combination of data-driven research, direct services, and people-driven advocacy, we ensure New Yorkers have the power to create change in their lives and the life of our city and state. Our programs, policy analysis, legal advocacy, and campaigns expand access to health care, safe and affordable housing, employment, opportunities for individuals with conviction histories, consumer debt assistance, and more—making a tangible difference in the lives of millions.



Testimony before the New York City Council
Subcommittee on Zoning and Franchises
October 22, 2024

Eric Rosenbuam
President & CEO
Project Renewal

Thank you for the opportunity to provide testimony today. My name is Eric Rosenbaum and I am President & CEO of Project Renewal.

We are one of New York City's largest homeless services providers, and we know that stable housing is the foundation upon which people build resilient families and communities. We are proud to partner with the city to provide shelter, housing, health care, and employment services.

Many of our clients who are unhoused also struggle with mental illness, substance use disorders, and histories of criminal justice involvement. These conditions are often rooted in patterns of unstable housing that stretch back to childhood – yet over 30,000 children are staying in a New York City shelter. Without equitable access to affordable and supportive housing, our city will continue to face rising mental health concerns, overdose crisis, and public safety issues.

Unfortunately, New York City suffers from an extreme shortage of affordable housing that has its origins in the aftermath of World War II. The GI Bill created a generation of homeowners—but also systematically excluded Black soldiers and their families. Denying them the wealth-building opportunity of homeownership had devastating consequences that continue to reverberate today.

The GI Bill was just one of the many discriminatory housing practices that created profound inequity that go well beyond housing. Urban renewal projects of the 1960s and 70s often led to the displacement of non-white and low-income communities. Gentrification, which continues to this day, has the same impact. And while housing discrimination is no longer legal, the impact is still disproportionately skewed to people and communities of color. This long legacy of housing inequity has resulted in generations of displacement and instability which are major root causes of the challenges our clients face.

The City of Yes proposals, including amendments that would expand opportunities for housing within all districts, can make a real difference in overhauling zoning regulations and addressing the availability of affordable housing.

Increasing affordability will reduce homelessness and address this key root cause of generational mental health challenges, substance use disorders, and criminal justice involvement. The alternative is a depressing and ever-increasing spiral of spending on shelter, mental health treatment, and jails.

We applaud the Mayor, City Planning, and the City Council for working to address the housing challenges that impact all of our neighbors. With the City of Yes, New York City will become more affordable and safer, a city where families at all income levels can thrive.

Thank you for this opportunity to testify.

[REDACTED]

From: angelo bellocchio [REDACTED]
Sent: Sunday, October 20, 2024 12:40 PM
To: Testimony
Subject: [EXTERNAL] no to city of yes

[REDACTED]

I am a longtime resident of City Island Bronx NY 10464 am I oppose the City of Yes

Angelo Bellocchio
[REDACTED]
City Island NY 10464

Good morning Speaker Adams, members of the City Council, other elected officials, and fellow civic leaders, all of whom are volunteers.....none of whom are paid...My name is Barbara Larkin, a retired NYC elementary school teacher and past president of the Belle Harbor Property Owners Association, a well-respected 70year old civic organization of over 1300 families which I am honored to represent. Its mission: to improve the quality of life of taxpaying homeowners. As a VP of Queens Civic Congress, I've participated in zoom meetings & rallies & I can confirm representatives from Springfield Gardens, Howard Beach, South Ozone Park, Cambria Heights, Neponsit, and Forest Hills just to name a few are adamantly opposed to this proposal. Objections include, but not limited to, lack of infrastructure needed to absorb increased density, absence of enough classroom seats to accommodate mandates limiting class size. If you think parking, traffic, and crowded streets are horrendous now, just imagine what increased density will do to our city. The population is now below 8,000,000 due to hundreds of thousands of taxpayers moving to other states. If this proposal, which is a top down, Robert Moses approach, is approved, hundreds of thousands of hard working New Yorkers would pack up & leave for sure. I thank God for the city council members who understand that much goes into rezoning....in 2008 dozens of civics worked cooperatively with John Young and together reached consensus. Recently, real estate developers have shared with me that there now exist empty housing units and that passing this draconian proposal is totally unnecessary! For those of you who are familiar with the series of books entitled Choose Your Own Adventure.....where the reader chooses the ending of a story.....I want you to imagine NYC's future:

Choice 1:.....Decades from now NYC would be a designated one of the most magnificent cities in the United States ...comprised of gorgeous highrisers in Manhattan and lovely quaint neighborhoods in its outer boroughs equipped with great schools, terrific hospitals, adequate parks, and plenty of fresh air. Residents are happy!

Choice 2: Decades from now NYC is a city which was abandoned by all its dedicated civic leaders, has unbelievable congestion denying elder parishioners the ability to attend church services, and constant water main breaks due to increased density of tall buildings throughout its outer boroughs.....
Developers are thrilled!

I implore you allChoose the Ending #1. Your children & grandchildren will applaud your legacy!

Thank you.....Barbara S. Larkin

Testimony for City of Yes for Housing Opportunity

Dear City Officials,

Here are my biggest concerns with the City of Yes for Housing Opportunity:

First, in regards to the building of affordable housing, the loosening of regulations for developers must have enforceable requirements in regards to the non-mandatory inclusion of affordable housing. Any concession or increased FAR in exchange for affordable housing must result the affordable housing promised at the AMI promised or result in a fine equal to the build of that affordable housing, which will fund affordable housing renovations throughout the city for the following:

- small building owners of owner-occupied buildings that have rent-stabilized units
- NYCHA housing units

Because the idea that “adding a little bit of housing in every neighborhood” will certainly increase the frequency of adjacent construction, the following protections and updates need to be made:

1. When an LLC claims to be the owner/ developer of a proposed construction, the DOB must also require confirmation of personal identities through government-issued identification.
2. A DOB permit application for a new building must include the currently required construction drawings, as well as foundation drawings and support of excavation drawings for any lot with adjacent structures.
3. A DOB permit application for a new building must include proof of a funded escrow account to pay for the attorney and engineer hired by the owners of the adjacent buildings as required by law.
4. A DOB permit application for a new building must include proof of adequate insurance coverage for their build/ employees/ contractors and any potential liability for damage to adjacent lots/ buildings.

All of these points will help protect existing owners/ families in adjacent properties, ensuring safety and maintaining housing security for long-time New Yorkers.

Thank you for your time and consideration.

Best regards,

Gia Sharp

Voter and homeowner

[REDACTED]

From: John Massengale [REDACTED]
Sent: Friday, October 25, 2024 4:56 PM
To: NYC Council Hearings
Cc: Testimony
Subject: [EXTERNAL] City of Yes Testimony from John Massengale

[REDACTED]

To the New York City Council:

Pasted in below is my testimony for the New York City Council's consideration of the rezoning proposed by Mayor Adams in the City of Yes.

Respectfully submitted,

John Massengale AIA CNU

The City of Yes Is Not the New York We Love: An Open Letter to the New York City Council

New York City is in a housing crisis. In response, Mayor Adams and Big Real Estate (the made up of the ten or fifteen families and corporations that own and build New York's biggest buildings and developments) propose the solution of zoning changes they have branded "The City of Yes" (COY). There are many good ideas in the third part of the proposal, the City of Yes for Housing Opportunity (COYHO). But implementation primarily relies on market-driven solutions, which means the most profitable of the ideas will likely be built, while others won't. There are few requirements and no funding for housing most New Yorkers can afford.

I am an architect and urban designer in New York, Chair of [CNU NYC](https://cnu.nyc/) <<https://cnu.nyc/>>, the local chapter of the [Congress for New Urbanism](https://cnu.org/) <<https://cnu.org/>>. I have been a YIMBY for decades, working around the country as an architect and urban designer to advance the cause of walkable, sustainable, and equitable neighborhoods, towns, and cities. Members of the well-organized and well-funded YIMBY movement call me a NIMBY, because I care about New York City, good architecture, strong urbanism, and affordable housing for all.

I've been writing about the COYHO in the Straus News community newspapers in New York like [Our Town](https://bit.ly/COY1) <<https://bit.ly/COY1>>, in an ongoing series on the design website [Common Edge](https://commonedge.org/) <<https://commonedge.org/>>, and [on my blog](https://blog.massengale.com/2023/03/23/nycresheight/) <<https://blog.massengale.com/2023/03/23/nycresheight/>>. Here are a few points that are not in many of the bullet point lists I've seen from various groups. I've covered all the points in greater depth in the [\[City%20of%20Yes%20articles%20listed%20here\]City of Yes articles listed here](https://www.cnu.nyc/newurbanism/coyho/). <<https://www.cnu.nyc/newurbanism/coyho/>>

Yes to Bigger Profits for Big Real Estate

The most profitable buildings in the history of New York are the super-luxury supertall apartment towers on Billionaires' Row on 57th Street. Because of that, COYHO has new ways to build them. The new R11 and R12 zones have FAR of 15 and 18: before Governor Hochul got rid of the 63-year-old, statewide 12 FAR cap this year, supertall developers had to rely on a combination of commercial and residential zoning to get what they wanted, limiting the areas where they could build. But new tools make it easier to transfer air rights, and therefore easier to build supertalls in more places: if COYHO is approved as written, the next generation of supertalls will be in midtown and downtown, where air transfer rights are unlimited. It remains to be seen what will happen on the Upper East and Upper West Sides, within view of Central Park. COYHO will allow towers up to 1,000 feet without using R11 or R12, which have Mandatory Inclusive Housing requirements. Any luxury housing developer with an option to avoid a permanent commitment to dealing with affordable tenants will do that.

With over 100,000 people per square mile, the Upper West and Upper East Sides of Manhattan are already two of the three densest residential neighborhoods in the Western world, more than twice as dense as the historic neighborhoods in London, Paris, and Rome. Like all the most popular residential neighborhoods in New York, the Upper East Side and West Side were built with height limits far lower than allowed today, even before the City of Yes. Despite what Big Real Estate says, residential neighborhoods were not governed by the 1916 zoning, which was for commercial districts, but by regulations that limited buildings to 1.5 times the street width or 150 feet, whichever was less. That limited buildings on side streets to 90 feet tall. The height limits gave air and light to the apartments, streets, and neighborhoods where people lived.

The booming economy of the Roaring Twenties brought some oversized buildings that skirted or simply broke the rules. The most egregious examples were apartment hotels, which were supposed to be in the business districts regulated by the 1916 zoning. These abuses contributed to a new statewide Multiple Dwelling Law in 1929, which allowed taller buildings on large lots of 30,000 square feet or more. These could have 150-foot towers on 150-foot "podiums" or bases that maintained the street wall. Only five of those exceptions were built before the 1961 zoning resolution thirty-two years later: four on Central Park West (the famous twin-tower buildings that reduced bulk above the base) and one on the East River, before Robert Moses built the FDR Drive (River House).

Towards the end of the 20th century, developers discovered they could charge a 30% premium for apartments that towered above their neighbors. The Chair of the City Planning Commission at the time, Joe Rose, said "Views have become so prized that we unleashed an intense desire for building height without regard for neighborhood character or scale. Each new building tries to achieve better views by being taller than the last. The consequence has been a powerful inducement to break away vertically as far as possible from the neighborhood pack. While there is nothing wrong with nice views, it is not necessary to have a city shaped by a desperate grab for them."

Rose proposed new zoning that emphasized neighborhood character and limited the height of residential towers. A third-generation New York developer, Rose spent the first few years of his time in office selling the plan to the development community. When he finally put his proposal on the Mayor Rudolph Giuliani's desk, however, there was a phone call from Big Real Estate within half an hour that killed the plan. Twenty-five years later, we have Big Real Estate's counterproposal in City of Yes—which we can already see in special permit buildings all around us. Hudson Yards and Billionaires' Row are the poster children for the City of Yes in Manhattan.

Rose called the 1961 zoning resolution an ideological statement of Modern planning that did “violence to our urban fabric.” He saw historic districts as New Yorkers’ response. The first historic district was Brooklyn Heights, which came four years after the 1961 zoning. Today, there are over 160 historic districts. Parasitically, Big Real Estate wants to profit from the value the historic districts have created by building alien invaders towering over their buildings and streets. COYHO will make it easier to do that.

Build Baby Build

Calling recent development “market-driven” is accurate to a degree, but much of it has been subsidized by New York’s taxpayers. The newly Neoliberal New York City subsidized the public-private construction of Hudson Yards, contributing more than \$5 billion in direct and indirect subsidies. Widely known as Dubai-on-Hudson, it is one of the most unpopular places in New York City. The city built waterfront parks on the Hudson and East Rivers—obviously a good thing—that created luxury housing sites on former industrial land. New York then sold air rights from the parks to the neighboring buildings, so those could be taller. Previously, no one thought parks had air rights to sell. The parks, like the Highline, were unaffordable housing generators. Contrast this with Battery Park City, built by a public body with the authority to create bonds. Battery Park City is a profitable development that makes a payment to New York City every year.

Recent history shows that the construction of expensive condos and rental apartments in New York City does not “trickle down” to lower prices for anyone, whether on Billionaires’ Row, along the river in Long Island City, or anywhere else. The most profitable building in the history of New York, the seventy-story condominium at 220 Central Park South, has slightly fewer apartments than the twenty-story building it replaced. But those were rentals. Approximately more than a third were rent stabilized (and more than half the occupied apartments when the building was sold were rent stabilized). One of the apartments in the new building sold for \$238 million to a Chicago hedge fund manager as his New York *pied-a-ciel*. Although it is not his primary or even secondary residence, it is the most expensive residential property of any kind ever sold in America.

Choosing a place to live, or finding a place where we can afford to live, is more complicated than buying a widget. For every article that points to supply and demand in housing and says “restrictive zoning” is the problem, there is another study that says no. Politics, economies, and housing are all local, and many of the issues in Manhattan are different than the problems in Manhattan, Kansas. Location, location, location and New York’s standing as a global city for the global rich contribute to our problems. So does the way New York State and New York City cater to Big Real Estate in what Sam Stein calls “the Real Estate State.”

Joe Rose’s cousin Jonathan Rose is a prominent affordable housing developer. He is also the author of a book called [The Well-Tempered City: What Modern Science, Ancient Civilizations, and Human Nature Teach Us About the Future of Urban Life](https://www.cnu.nyc/newurbanism/the-well-tempered-city-reviewed/). <<https://www.cnu.nyc/newurbanism/the-well-tempered-city-reviewed/>> A New Yorker, Rose complements and amplifies many of the points made by the great New York urbanist, Jane Jacobs, in particular her emphasis on the complexity of cities. It is a mistake to boil the planning of cities down to the single-issue factors that the City of Yes, Big Real Estate, and YIMBYs emphasize: height, density, or the number of new building permits being the usual ones. Looked at in isolation, these factors can support the supply-and-demand argument, implying that all we have to do is to remove restrictions and we will have housing for all. Jacobs, however, convincingly made the case that these simplistic arguments “go about the problem from the wrong end.” They might produce higher profits, and even higher property taxes, but they diminish the city and city life.

We Deserve Better

On Billionaires' Row, in Long Island City, in downtown Brooklyn, and along the Hudson River, New York developers have built tens of thousands of new apartments recently. But they are almost all expensive, they frequently sit on one-way, suburban-style streets, and most of them could be in any city in the world that has apartment towers. New Yorker Leah Goodridge, one of the three New York City Planning Commissioners who voted against COYHO, said afterwards, "There were lots of Black and brown New Yorkers who came and testified against this project." What they asked, she added, is "Why are we giving away the city to private developers? What are we getting in return?"

Affordability is a large part of what many New Yorkers worry about. There is also the nature and character of the city we love and choose to live in. Walking around the most loved New York neighborhoods, we see their buildings are lower and their streets are more comfortable places to be. New Yorkers put up with small apartments and take part in public life outside their apartments. In New York City, most of our public space is in our streets. This is not "just about aesthetics," a common YIMBY dismissal. Many of the places Big Real Estate has built are not places where New Yorkers want to be. They are frequently what New Urbanists call "density without urbanism," with placeless towers sitting on auto-sewer streets.

We deserve better. City University of New York Professor David Harvey said it well: "The question of what kind of city we want cannot be divorced from the question of what kind of people we want to be, what kinds of social relations we seek, what relations to nature we cherish, what style of life we desire, or what aesthetic values we hold."

John Massengale AIA CNU

Architect, Urbanist, Author, Educator.

Fellow | [CNU](#) | [Seaside](#) | [Create Streets](#)

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[REDACTED]

From: [REDACTED]
Sent: Tuesday, October 22, 2024 5:24 PM
To: Testimony
Cc: [REDACTED] Marmorato, Kristy
Subject: [EXTERNAL] CITY OF YES public hearing

[REDACTED]

I am against the proposed “City of Yes”.

I am a lifelong resident of the Bronx and plan to stay here and raise a family here. I feel this is going against what community activists have fought to protect and fix and preserve the great communities of NYC.

The proposed “City of Yes” initiative in New York City, which aims to streamline the approval process for developments, has drawn criticism for several reasons:

1. **Risk of Gentrification:** The initiative could accelerate gentrification in vulnerable neighborhoods, leading to rising rents and property values that may displace long-term residents and small businesses.
2. **Community Displacement:** By facilitating rapid development, there’s a concern that existing communities may lose their identity and cohesion as new developments cater primarily to wealthier newcomers.
3. **Environmental Impacts:** Critics worry that a faster approval process may neglect necessary environmental reviews, leading to developments that could harm local ecosystems or exacerbate climate-related issues.
4. **Lack of Community Engagement:** Streamlining processes may reduce opportunities for residents to provide input on developments that affect their neighborhoods, undermining local voices and priorities.
5. **Infrastructure Strain:** Rapid development without adequate planning may place undue pressure on existing infrastructure, such as public transportation, sanitation, and emergency services, leading to overcrowding and decreased quality of life.
6. **Equity Concerns:** The initiative may favor wealthy developers and projects that serve affluent residents, further widening the gap between different socioeconomic groups and neglecting affordable housing needs.
7. **Quality Control:** A focus on speeding up development processes could lead to shortcuts in building safety and quality standards, raising concerns about the long-term sustainability and safety of new construction.

In summary, while the “City of Yes” initiative aims to encourage growth and modernization in NYC, its potential downsides highlight the need for a balanced approach that considers the needs and voices of existing communities.

Joseph Connolly

[REDACTED]

Bronx NY 10465

[REDACTED]

Sent from my iPhone

[REDACTED]

From: Mariama James [REDACTED]
Sent: Tuesday, October 22, 2024 1:46 PM
To: NYC Council Hearings
Subject: [EXTERNAL] City of Yes Housing Opportunity Public Hearing Testimony
Attachments: IMG_8031.jpeg

[REDACTED]

My greatest concern is affordable housing and the fact that CoY doesn't mandate any at all and that affordable units created in exchange for developer incentives don't have to be allocated on the site of the development receiving the incentives, allowing for the continued relegation of communities of color and/or low income earners to the outer boroughs, effectively red-lining while also turning areas like those in Lower Manhattan into luxury enclaves even existing middle to upper class residents are being priced out of, fueling their migration to & gentrification of those same outer boroughs which of course results in the poorer people being pushed out. Talk about a vicious cycle. It's downright nasty!

New York has got plenty of housing stock. What we need is specifically, genuinely and permanently affordable housing. Trickle-down economics is a 50 year failed experiment conducted by the most Conservative of Republicans. It does not and will not work in housing here. Further, there are no unhoused or housing insecure wealthy people clamoring in the streets. It's simply bad math to develop the majority of housing at market rates. All government properties developed for residential use must be 100% and permanently affordable with a plethora of multi-bedroom units for families at AMIs of 60% and below.

Consider when creating this housing that AMI, a metric implemented in the 1930s, in 2024 is racist, sexist, homophobic, classist, ableist and transphobic. It was derived in a time when there was a "man of the house". Women couldn't even have their own bank accounts. Black people couldn't even vote. Today a family may consist of a single woman, one sole female income earner who presumably earns less than her male counterparts, and her two kids or two lesbians, or a trans person with a child. I know it's federal and there's nothing you can do about the metric itself but you can keep it in mind when determining what AMI truly makes sense for most New Yorkers and is sustainable.

Below is a related quote of mine in this past Thursday's Crain's Business. Thank you for "hearing" me out.

Regards,

Mariama James

100% Affordable 5WTC co-founder

Manhattan's 5 World Trade Center ahead) to make all of them affordable. Officials ultimately reached a deal to make about one-third of the units permanently affordable for households earning between 40 and 120% of the area median income or about \$56,000 to \$168,000 for a family of three.

The Coalition for a 100% Affordable 5WTC was the main community group advocating for more affordable housing there. Mariama James, steering committee member, said the group has "absolutely" talked about pushing for housing at 2 World Trade Center as well.

"I think that we should all see the writing on the wall that commercial space is largely dead in terms of huge brick-and-mortar spaces," she said.

"Affordable housing, on the other hand, remains a grave need, particularly here in Lower Manha

My family and I oppose the City of Yes for Housing Opportunity text amendment. We live in Flatbush Prospect Lefferts Gardens where many blocks are not yet landmarked. Our block enjoys community and connections with its neighbors, some of whom have been residing here for over 40 years. There is a strong commitment to the community from long-time and recent home owners and apartment residents. There is great value in a neighborhood where people aren't forced to leave and can live where they appreciate their neighborhood.

We oppose the Zoning for Housing Opportunity amendments and request that your council members vote "No." These amendments are not ideal. As you are aware, there is not a need for further upzoning to create housing or affordable housing; in fact, there is a need for "right zoning" to preserve the stability of our residential community, historic architecture and small business and ensure that population density does not overwhelm infrastructure, including sewers, public schools, parking, sidewalks, subways and sanitation.

Please support community based planning to allow local community boards and council members to determine where and whether zoning or parking waivers are appropriate in exchange for affordable housing or other community benefits and mitigation of environmental effects. Adding density or reducing parking is appropriate in different places in different communities. Most of District 9 is covered by R6 and R7 zoning that would receive massive density increases, leading to the demolition of most of our neighborhood, with current tenants having to leave and wait years before competing with the rest of the city in a lottery for new apartments.

Support non zoning affordable housing strategies, especially affordable housing preservation. According to the city planning equitable development data explorer, 2/3 of Community District 9 dwelling units are in rent stabilized buildings. In addition, over 25,000 units of buildable housing remain possible under the current zoning.

Thank you for your attention.

Your constituent,

Maura Balaban

[REDACTED]

I live in Midtown, but I am originally from the south, the South Bronx. You can take the boy out of The Bronx, but not The Bronx out of the boy, which means to me - a lifelong concern for the poor, for the migrant, for working people of all backgrounds and ages from all parts of our world - for "the least of these."

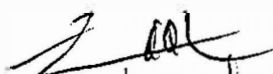
I applaud Chair Garodnick for his superhuman efforts to solve our decades-long and ever-overwhelming affordable housing crisis.

A little more housing in every neighborhood and greater density around transit hubs are excellent concepts, but what kind of housing, who's building it, who's profiting, who's paying too high a price?

We must have modest, contextual development, as Chair Garodnick says, and housing affordability must come with greater investment in places like The Bronx as Councilmember Salamanca points out, but the underlying question with this City of Yes text amendment remains - will it increase or decrease economic and racial segregation in our town?

Here's an example of how developers, bankers, and venture cap game the global real estate market in this city - The Prince George, a 1904 landmark, thirteen stories with more than 400 units of supportive housing, always in need of funds, sold air rights to the developers of the "billionaires' bunker-in-the-sky" on Fifth Avenue & West 29th Street, more than fifty stories high with maybe less than 30 units, none smaller than two story duplexes, for people who might reside there for the two weeks of the US Open... meanwhile the Avenue is teeming with our unhoused neighbors.

Let's ask ourselves how we might build the housing we need while preserving light & clean air, our streetscapes & green spaces... Let US make investments in housing, hospitals, schools, parks, and public transportation rather than leaving this to the whim of pecuniary interest.


Paul H. Zulkowitz

[Redacted address line]

NEW YORK, NY 10014

740 THE AVENUE, 15/F, NEW YORK, NY 10014
740 THE AVENUE, 15/F, NEW YORK, NY 10014

Good morning, and thank you for giving me the opportunity to speak to you all today. My name is Sallyann Sinisgalli. I am a lifelong resident of Howard Beach. I grew up here, went to school here, and have raised my kids here.

I speak before you today to discuss the City of Yes Housing Proposal. I want to cite multiple grievances that I have with this plan, including an over-generalized plan, lack of community discourse, and the overcrowding of schools and other municipalities.

Starting with the problem of this over-generalized plan, the City of Yes Housing Proposal makes the wrongful assumption that since every neighborhood is within New York City, they will all be equally affected, and one general plan will work for the whole City. I can assure you this assumption is not only incorrect but is absurd. Each borough has a specific layout and makeup, and this plan will have greater adverse effects on Queens and my neighborhood, Howard Beach, than the likes of others. If this plan passes, the streets will become packed with cars, and we do not have adequate public transportation in Queens, and the whole reason why many like me live in Queens or Staten Island and not one of the more urban boroughs like Manhattan or Brooklyn is because I do not want to live in a neighborhood full of multiple family homes. I have chosen to buy a house in Howard Beach, Queens because I wanted to stay in the City that I love without living in a building. In my neighborhood, like so many others, we enjoy the luxuries of easy parking, lower density, and single-family houses. That is why I bought a home here. To pass this plan and implement the City of Yes is to upend and ruin the dreams of many families like mine.

The second problem I want to address is the lack of community discourse while creating this plan. Mayor Adams and his tyrannical administration have decided they know what's best for us. Instead of hearing the voices of the communities and the people, the Adams

administration has gone ahead and created this plan that just moves to further an agenda that I, along with many others, do not get behind. As someone who is elected to be a representative, Adams and his plan does not represent the interests of so many New Yorkers. I ask that the committee starts to consider our community's complaints before they let this plan go forward as it stands today.

The final problem that I want to address, and possibly the most important, is the effect that this plan will have on our schools and municipalities. This plan will be detrimental to our public services. I went to public school in Howard Beach, and so did my children. If you allow this plan to go through, the quality of the education system in our neighborhoods will fall. With more children in the schools comes less classroom space, and less attention for each child. If there is one thing we cannot allow, that is our children to suffer at the hands of a poorly made plan.

Examining this plan in its entirety, I have seen its many shortcomings. I ask that you consider all the points I have made today and consider the effects this plan will have on our City, our neighborhoods, our communities, and our children. You have the power in your hands. Please do not fail us. The next generation is counting on you.

CHARNEY

5-26 46th Avenue, Suite 2A
Long Island City, NY 11101
charneycompanies.com

Thank you to the Mayor's Office, the Department of City Planning, and all those involved in advancing the City of Yes for Housing Opportunity proposal. I also extend my gratitude to the members of the City Council, Borough Presidents, Community Boards, and housing policy advocates who have contributed to this important initiative.

As we approach the upcoming City Council vote, I want to express my strong support for this proposal. The City has not seen proposed zoning changes this bold since the 1960s, and these are crucial for enabling New York City to build smartly and affordably. The implications of these changes are vast and will benefit generations to come.

The City of Yes for Housing Opportunity directly addresses the root cause of our housing affordability crisis: limited housing production. As a developer focused on affordable housing, I understand the complexities involved in advancing housing projects. While I appreciate the recent supportive actions taken at the state level, including legislation passed in Albany earlier this year, it is essential to utilize every tool at our disposal to tackle our city's housing supply challenges. The basic principle of supply and demand dictates that increased housing production is vital for lowering prices.

This proposal provides an essential opportunity to address our housing needs. Although it is not a panacea, it represents a significant step toward alleviating the housing crisis, complementing ongoing efforts at the state level.

The financial viability of real estate development projects hinges on their ability to yield returns for investors. For public goods like affordable housing, incentives such as tax abatements are critical to stimulate investment. Without these incentives, we face stalled projects and historically low vacancy rates. The zoning changes proposed in the City of Yes initiative offer a new and potentially far-reaching approach to this challenge.

I seek to clarify the role of real estate developers in this process. While often misunderstood, our work is a legitimate profession subject to considerable risks. Developers are held to high standards of financial and personal accountability, particularly when projects face delays or obstacles.

Over the past year, I have actively engaged in discussions around housing, particularly affordable housing, with legislators at both the city and state levels. I strive to be a transparent ally to elected leaders, sharing insights and developing comprehensive financial models that illustrate how proposed legislation impacts real estate financing. This commitment to transparency is fundamental to my role.

Transformative social change can be achieved through both bold initiatives and thoughtful, incremental measures. The City of Yes for Housing Opportunity embodies this incremental approach, sharing the burden of housing development across neighborhoods and ensuring that no single area disproportionately bears the weight of this responsibility.

From a developer's perspective, policies that enhance affordability in high-cost neighborhoods must be embraced. The Universal Affordability Preference (UAP) proposal will contribute to increasing the housing stock and addressing decades of discriminatory housing policies. Removing density limitations will

facilitate development of a range of housing typologies to serve a broader set of constituencies, meeting the housing needs of more New Yorkers.

As a car owner, I understand the concerns of driver communities, especially in transit-deprived areas. However, we must also advocate for parking reform by eliminating outdated parking mandates for new construction. The choice between housing and parking is clear, and we should follow the lead of progressive cities in modernizing our zoning laws for a sustainable future.

I also support the inclusion of Accessory Dwelling Units (ADUs) in the City of Yes proposals, while recognizing the valid concerns raised by some neighborhoods. I encourage state support through incentives and subsidies for ADUs, which can provide significant financial benefits to homeowners.

Whether through developing housing in commercial corridors or converting office buildings into residential units, all these measures aim to achieve a singular goal: increasing housing supply to reduce costs.

Ultimately, the key question regarding housing affordability in New York City is straightforward: according to supply and demand economics, increasing supply will lead to lower prices. I urge our elected leaders to support this proposal and make decisions that align with our shared goals.

As a lifelong New Yorker, I am committed to fostering equitable and mixed-income housing, which enriches our city's diversity. We must establish housing policies that reflect our world-class status. Let us seize this opportunity to affirm housing as a human right and work together to create a lasting legacy of affordable housing for New York City.

Samuel Charney
Principal
Charney Companies LLC

A handwritten signature in black ink, appearing to be 'SC' or a stylized version of the name Samuel Charney.

[REDACTED]

From: Stacey OToole [REDACTED]
Sent: Monday, October 21, 2024 1:39 AM
To: Testimony
Cc: HOWARD BEACH LINDENWOOD CIVIC
Subject: [EXTERNAL] CITY OF YES TESTIMONY

[REDACTED]

I am unable to attend the upcoming meetings regarding the City of Yes proposal and I am sending this email to voice my concerns regarding this proposal.

I am a life-long resident of Howard Beach. Howard Beach is a small hometown within Queens with a country feel. This neighborhood has a very strong sense of community. We look out for one another and respect our community and our neighbors. Unlike Manhattan, South East Queens is suburban with a beautiful natural environment. This is the reason so many generations have remained in Howard Beach; we love our neighborhood.

Unfortunately, the City of Yes proposal will change the character of our neighborhood along with the surrounding neighborhoods. We already have infrastructure concerns such as:

- Extreme traffic congestion on the Belt Parkway, Woodhaven Boulevard and Crossbay Boulevard make it dangerous for EMT, Fire and Police to respond quickly to life or death situations.
- Increased flooding in coastal areas of Queens, especially the Rockaways, Broad Channel, Hamilton and Howard Beach, which are still not protected with storm resiliency projects. Lives were lost in these areas during Super Storm Sandy and none of these areas should have more residents increasing the usage of water and sewer resources that are already inefficient. Basement apartments would be death traps if another storm would hit this area.
- Old Howard Beach has only one public school which is PK-8 and our neighborhood's public high school has been extremely overcrowded for years.
- The nearest hospital is already overwhelmed and with the traffic congestion in this area getting to the emergency room in a life or death situation could be deadly.
- Our environment is suffering; we lack sufficient sanitation services, increased airplane and helicopter traffic, noise pollution and car emissions. More housing will only increase the need for services that our City cannot keep up with now along with an increase in air pollution.

- Our public service employees are already understaffed especially Police, Fire/EMT, Teachers and Sanitation employees. We have the best agencies in the country, however, at this time they are extremely overwhelmed.

A change in zoning and increased housing with the lack of adequate infrastructure is dangerous for our wonderful city, its residents, and its employees. It should not be approved.

I strongly oppose the City of Yes proposal and say, “NO TO CITY OF YES”.

Stacey OToole

[REDACTED]

From: Teresa Bencivengo [REDACTED]
Sent: Tuesday, October 22, 2024 10:36 AM
To: Testimony
Subject: [EXTERNAL] City of yes

[REDACTED]

How many nieghhoods must you destroy !!!!!begging of you to vote NO 🙏🙏🙏🙏🙏
Sent from my iPhone

Opposition to City of Yes Housing Opportunity Text Amendment

October 21, 2024

To everyone voting on this proposal in the City Council:

I am writing to you to express my opposition to the City of Yes Housing Opportunity text amendment proposal. I chose to live in Howard Beach and or/raise a family here because of its suburban feel and one- and two-family homes that make it a tight knit community. Although I love living in Howard Beach, the city for decades has not done its job to care for the infrastructure here as we experience major flooding with any high tides and rainfall.

There are many reasons I oppose the plan including:

- **We do not have adequate resources for schooling for more children as our schools are overcrowded with one school even having trailers in its school yard.**
- **We have inadequate infrastructure for utilities and sewers. Cross Bay Boulevard is often closed during high tide and coastal weather events because of the danger of passing through.**
- **We have inadequate staffing for NYPD, FDNY and EMTs to cover more people that would be living in the community. The response times to 911 calls have increased in our community with the depletion of the police department.**
- **We see on a regular basis the inadequacies of the 311 system as the Department of Buildings is trying to address the problems created by developers, who are not closely monitored by city agencies or the DEC**

NYC residents were not the authors of the City Planning proposals and are therefore not confident that anything would come of the proposals other than straining our already overburdened resources. There is no upside to this proposal for our community.

I ask that you vote NO on this proposal on behalf of the people you represent.

Sincerely,

Tom Balbone

For the New York City Council

Public hearing on City of Yes for Housing Opportunity

Testimony for necessary urgent solving housing problem in NYC

OPEN NEW YORK

Valentyna Novosad

Over 500000 Ukrainian refugees have arrived in the US, and New York State, particularly NYC, leads the city in welcoming them. It is a particular category of refugee because:

1. Most Ukrainian refugees are women, women with children, and elderly people.
2. Many of them lost their homes due to the War, as well as losing their husbands and sons.
3. Often, their income is zero initially and long due to unemployment due to language barriers.

The most pressing issue for this category of refugees, as for all refugees in NYC, is the housing crisis. The housing situation for Ukrainian refugees in NYC is fraught with challenges. Many refugees are struggling to find affordable housing in NYC, a city known for its exorbitant rents. The limited resources and support services available further complicate the situation, making it difficult to secure stable housing and employment, hindering their ability to find suitable accommodation. While community organizations work tirelessly to assist, the demand often surpasses the available resources.

The first step towards resolving this issue is to Increase the number of affordable housing buildings. By expanding the availability of affordable housing units through new developments and subsidies for existing housing, we can help alleviate the shortage and provide a more stable living situation for Ukrainian refugees in NYC.

Also important is Increasing the number of shelters and transitional housing designed explicitly for women, children, and elderly people.

Another vital aspect of the solution is to provide comprehensive support services. By offering job training and hiring events, we can empower women to secure stable housing, addressing a key challenge Ukrainian refugees face in NYC.

Increasing funding for housing vouchers can help low-income families afford housing in desirable neighborhoods.

Restoring the rental temporary assistance program for up to one year for those in temporary financial difficulties will save many families who lose their housing due to their temporary inability to pay.

Community Partnerships, such as collaborating with local nonprofits and community organizations, can enhance support networks and resources available to women in need.

Other steps to resolve the housing problem are:

- Expanding the programs to support buying the first accommodation with conditions affordable to low-income families.
- Increasing the use of 4% LIHTC for building affordable housing.

Solving housing problems is urgent for several reasons:

1. Immediate Safety: Many refugees flee conflict and violence, needing urgent housing to ensure their safety and well-being.
2. Mental Health: Stable housing is crucial for mental health, helping refugees get rid of trauma and stress from displacement and War, which they had in their native countries.
3. Integration into society: Access to housing facilitates integration into the community, allowing refugees to establish roots, find jobs, and participate in local life.
4. Impact on Children. Children are particularly vulnerable. Stable housing is essential for their education, health, and overall development today; it cannot be postponed to the future.

5. Public Health. Adequate housing helps prevent overcrowding and associated health risks and reduces strain on public health systems.

6. Community Stability. Addressing housing needs supports social cohesion and reduces potential tension in communities hosting refugees.

7. Moral Responsibility. Providing housing aligns with humanitarian principles and reflects a commitment to support those in crisis.

Urgent action is necessary to address these interconnected challenges effectively.

[EXTERNAL] Support for Lifting Parking Requirements

Aaron Jefferson <

Wed 10/23/2024 1:28 PM

To: Land Use Testimony <landusetestimony@council.nyc.gov>;

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I support lifting parking requirements; this measure will improve NYC's ability to build more housing much more easily than is done now. Parking requirements take up valuable space, and ultimately make the city less safe due to the proliferation of cars in a city where public transportation and pedestrianism should be prioritized.

Regards,

Aaron

From: [Aaron Schloff](#)
To: [Land Use Testimony](#)
Cc: [District25](#)
Subject: [EXTERNAL] This New Yorker urges the City Council to pass City of Yes -- end parking mandates!
Date: Friday, October 25, 2024 8:43:25 AM

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe. Report suspected phishing emails with the Phish Alert Button or forward them to phish@oti.nyc.gov as an attachment.

Dear Council:

I am writing to urge you to pass City of Yes and to end parking mandates for developers.

If people want parking, they can rent or buy in a building that has it. But if builders can choose whether to have parking or not, they can build more affordably.

I'm a native born New Yorker but regardless, I say New York is for New Yorkers who care about it, no matter how long you've lived here. Half my council district (and half of my borough) is foreign-born. I like it here. I'm against nativism.

Let's build more housing so people can afford to stay here.

Regards

aaron mack schloff
Jackson Heights NY

From: [abby schroering](#)
To: [Land Use Testimony](#)
Subject: [EXTERNAL] City of Yes for Housing Opportunity
Date: Tuesday, October 29, 2024 3:30:58 PM

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe. Report suspected phishing emails with the Phish Alert Button or forward them to phish@oti.nyc.gov as an attachment.

Greetings!

I am writing to encourage you to end parking mandates. They are out of date, and they move us in the wrong direction. Please prioritize space for pedestrians, cyclists, green space, and affordable housing, and continue working toward an NYC with minimal cars.

Many thanks,
Abby

Harlem Resident

From: [Abu Nayeem](#)
To: [Land Use Testimony](#)
Subject: [EXTERNAL] Testimony on parking mandates and City of Yes
Date: Wednesday, October 23, 2024 4:22:14 PM

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe. Report suspected phishing emails with the Phish Alert Button or forward them to phish@oti.nyc.gov as an attachment.

Hi, my name is Abu Nayeem residing on Community Board 12. I support lifting parking mandates and the City of Yes, Housing Policy.

--

~Abu Nayeem

[Founder/Programmer of the Saint Paul Open Data Initiative](#)

[MS Agricultural and Resource Economics from UC Berkeley](#)

[EXTERNAL]

Adam Drake <>

Tue 10/22/2024 10:25 PM

To: Land Use Testimony <landusetestimony@council.nyc.gov>;

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe. Report suspected phishing emails with the Phish Alert Button or forward them to phish@oti.nyc.gov as an attachment.

I support removing parking minimums and building as much housing as possible to lessen the burdens imposed by the housing crisis. Recent comments from councilmembers suggesting those who weren't born in nyc don't deserve a voice are disqualifying and out of touch. Nyc wouldnt be great if people didn't move here. None of you should forget that (or enjoy a primary).

-Adam

[EXTERNAL] Testimony on City of Yes Parking Mandates

Kroopnick, Adam J. <

Wed 10/23/2024 11:21 AM

To: Land Use Testimony <landusetestimony@council.nyc.gov>;

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe. Report suspected phishing emails with the Phish Alert Button or forward them to phish@oti.nyc.gov as an attachment.

Hello,

I have lived all over New York City since moving here 14 years ago. Housing has gotten increasingly expensive and our mass transit options have lagged as our roads have gotten more clogged. Ridding ourselves of the parking mandates to increase housing is critical to maintaining a city that is equitable and diverse. It is asinine for us to mandate parking minimums in areas as densely populated as New York City and we should free developers to put in parking where it is demanded—i.e. In transit deserts in low-density areas—and more housing where it is needed—i.e. In the high-density neighborhoods.

We must move away from policies that were put in place 70 years ago and think of a greener, mass-transit oriented future.

Thank you

Adam Kroopnick

Adam Kroopnick, M.D.



From: [Adilene Sierra](#)
To: [Land Use Testimony](#)
Subject: [EXTERNAL] City of Yes Zoning for Housing Opportunity
Date: Wednesday, October 23, 2024 1:01:56 AM

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Good evening,

I'm writing in regards to the COY proposal by the City Planning department. As a resident of CB1 in the Bronx, I am concerned by a few things in the proposal that I feel have been overlooked. Firstly, as per a presentation given by the Planning department representatives in my CB, they mentioned new units are planned to fall between the 40-60% AMI, which I strongly believe should be lowered to 20-60%. If the true aim of this project is to make housing accessible and affordable to longtime residents New Yorkers who are unable to keep up with current market rate rents, then there should be steps to make sure that not only

- A. These new units in question are to be **actually** financially accessible to lower income residents of the city
- B. That there are actual proposals for rent regulations for these new units (i.e. rent stabilized, rent controlled units).

Failure to implement these basic requests in the initial proposal leads me to ask who exactly are the new developments for, if not lower to middle income residents who have been priced out of their longtime homes for years now?

Furthermore, there should be a push to raise the amount of affordable units within the new developments. As it stands, by the time these are built, only 10-15% of the total units will be affordable. If the genuine aim of this project is to include New Yorkers who are currently houseless, on the verge of eviction, and in precarious housing situations, then the aim should be to raise it to 80%, not lower it. Given the amount of people that applied for section 8 housing earlier this summer, the demand is for truly **affordable** housing, not a handful of "affordable" units within a newly built complex.

The privatization of these dwellings will highlight that those who are able to get an apartment do so out of luck, not out of being granted a basic right. And on that note, is there a reason why this doesn't become an extension of public housing, given the alarming rate of houseless people in the city? Would that not alleviate the precarious housing issues people find themselves in, instead of handing over a "housing crisis" to private developers who are offered limited incentives to help alleviate it besides filling their pockets?

In addition, if this is to address the housing crisis that is being presented, then I believe there is a gap in this proposal to address the thousands of currently vacant rent stabilized units in the city. creating a plan to open up those vacant units would help thousands of currently houseless residents, adding to the number of units available. There should definitely be a plan to incentivize landlords to open up the units and **keep** them at their current rental rate.

Lastly, I believe there should be an incorporation into this proposal for green space within the developments. Given that many of our old buildings built last century were larger in size, some had access to courtyards and gardens, there should be green spaces for tenants to congregate, and at the very minimum include terraces and/or balconies.

Thank you,
Adilene

[EXTERNAL] Testimony For Zoning For Housing Opportunity

Adria Crum <[REDACTED]>

Fri 10/25/2024 6:20 PM

To: [REDACTED] Land Use Testimony
<landusetestimony@council.nyc.gov>; Speaker Adams <SpeakerAdams@council.nyc.gov>;

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Peter Ventura and I (Adria Crum) oppose the City of Yes for Housing Opportunity text amendment. We live in Flatbush Prospect Lefferts Gardens, where many blocks are not yet landmarked. Our block enjoys community and connections with its neighbors, some of whom have been residing here for over 40 years. There is a strong commitment to the community from long-time and recent homeowners and apartment residents. There is great value in a neighborhood where people aren't forced to leave and can live where they appreciate their neighborhood.

We oppose the Zoning for Housing Opportunity amendments and request that your council members vote "No." These amendments are not ideal. As you are aware, there is not a need for further upzoning to create housing or affordable housing; in fact, there is a need for "right zoning" to preserve the stability of our residential community, historic architecture and ensure that population density does not overwhelm infrastructure, including sewers, public schools, parking, sidewalks, subways and sanitation.

Please support community-based planning to allow local community boards and council members to determine where and whether zoning or parking waivers are appropriate in exchange for affordable housing or other community benefits and mitigation of environmental effects. Adding density or reducing parking is appropriate in different places and communities. Most of District 9 is covered by R6 and R7 zoning that would receive massive density increases, leading to the demolition of most of our neighborhood, with current tenants having to leave and wait years before competing with the rest of the city in a lottery for new apartments.

Support non-zoning affordable housing strategies, especially affordable housing preservation. According to the city planning equitable development data explorer, 2/3 of Community District 9 dwelling units are in rent-stabilized buildings. In addition, over 25,000 units of buildable housing remain possible under the current zoning.

Thank you for your attention.
Your constituent,

Adria Crum & Peter Ventura
[REDACTED] BK, NY

From: [Aesha Valencia](#)
To: [Land Use Testimony](#)
Subject: [EXTERNAL] OPPOSAL TO NYC A CITY OF YES PLAN
Date: Thursday, October 24, 2024 9:43:48 PM

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To Whom it May Concern: The City of Yes plan, a 1 size fits all agenda, is a poor fit for our communities. This proposal will put additional burden on already overwhelmed infrastructure in flood prone areas. Place stress on already overcrowded and many underperforming schools. In most situations increased population and density will jeopardize public safety. Our police force, fire department, EMS, health and human services cannot withstand additional work loads. This aggressive plan will remove parking mandates for new development projects. Our car-centric, R 1 - R 5 neighborhoods are already parking deprived. A housing crisis is the alleged reason for this over reaching plan. However, allowance of tens of thousands of new entrants to our city while there is a crisis is akin to strategically placing additional holes in a sinking ship. New York City cannot maintain their sidewalks. Over 9,000 sidewalks damaged by tree roots await repair. The repair wait list exceeds 5 years. New York City please fix what you have before adding more. Go back to the drawing board and do a district by district assessment. Determine which fingers properly fit the gloves and bring a modified product back to the respective council members and their constituents for approval. Reject this City of Yes-Housing opportunity initiative in its entirety and VOTE NO! Tell City Planning to go back to the drawing focusing on affordability, home ownership and our needed infrastructure. Force feeding creates a gag reflex. This plan in its current state is not digestible for many New Yorkers. Thank you in advance for your anticipated cooperation.

Best,
Aesha Valencia
[REDACTED] Bronx NY 10461

Sent from Gmail Mobile

Foreword

The United States is facing an unprecedented mental health crisis, with staggering increases in stress, depression, isolation, loneliness, and accompanying mental health hurdles faced by Americans of all ages. Addressing this surging mental health crisis is one of the most pressing issues facing America's cities. In many of its national meetings, the U.S. Conference of Mayors has examined mental health issues, adopted a considerable body of policy relating to the mental health crisis, and called for an adequate federal, state and local response to it. Leading Conference efforts on the issue is our Vice President, Reno Mayor Hillary Schieve, who chairs our recently formed Task Force on Mental Health.

Following up on discussions on mental health during our Leadership Meeting in March, we asked mayors to respond to a survey to help inform the work of the new Task Force, further development of the Conference's mental health policy, and our advocacy efforts in this area. The survey sought to collect information on mental and behavioral health needs in cities and the ability of local agencies to meet residents' service needs; mental health problems affecting young people and the services available to meet their needs; the relationship between homelessness and mental health problems; emergency response initiatives; police officer health and wellness; and behavioral health worker shortages.

Survey responses received from 117 cities in 36 states provide a wealth of information about mental health needs in our cities, how local officials are working to address them, the problems they are facing in doing this adequately, and what they need to better serve those with mental and behavioral health problems. This information is contained in this publication. We are discussing the survey's findings during our 91st Annual Meeting in Columbus, June 2-5, and will use them under Mayor Schieve's leadership to inform the work of our Task Force and in advocacy efforts aimed at meeting cities' needs in this area and expanding access to mental and behavioral health services.




Tom Cochran
CEO and Executive Director
June 2023

The cities that experienced an increase in mental health problems were asked to identify the main causes of that increase. Leading the list was substance abuse, with 85 percent of the cities identifying it. This was followed by:

- COVID-19, listed by three-fourths of the cities;
- Homelessness, by 74 percent;
- Economic concerns and/or uncertainty, by 72 percent;
- Affordable housing shortage, by two-thirds; and
- Unemployment, by 27 percent.

The cities reported that their top mental and behavioral health problems are:

- 
- Substance use disorders, in 65 percent of the cities;
 - Homelessness stemming from mental illness, in 56 percent;
 - Mental and behavioral health worker shortages (including school counselors), in 56 percent;
 - Access to behavioral health services, in 56 percent;
 - Mental illness among young people, in half of the cities;
 - First responder and other municipal employees' mental health needs, in six percent.

Other mental and behavioral health problems listed by individual cities were depression, loneliness and isolation, lack of mandatory long-term mental health care, and parent and family mental health and wellness resources.

Eighty-two percent (96) of the cities reported that they have developed new initiatives or programs and/or increased funding to established programs to address growing needs for mental health services within specific groups in the community. The remaining 21 cities (18 percent) said they had not.

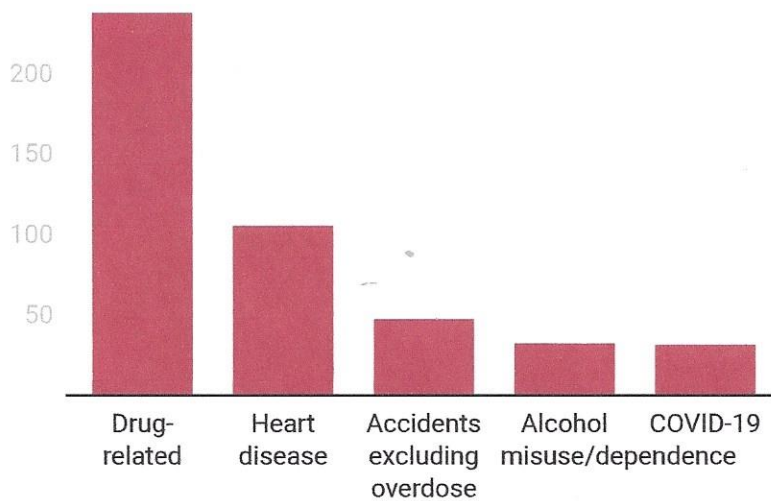
Drug-related overdoses overtook “alcohol misuse or dependence” as the leading cause of death in the DHS/OCME count in 2014, and have since remained the main killer among homeless New Yorkers, reflecting a nationwide increase in fatal drug use.

Not even a lethal pandemic killed more homeless New Yorkers than drugs like fentanyl-laced opioids.

COVID-19 accounted for about 20 percent of the deaths in the 2020 fiscal year, but dropped to about 5 percent last year, making the coronavirus the fifth leading cause of death. Since the start of the pandemic, at least 135 New Yorkers experiencing homelessness have died of COVID-19, according to DHS data.

Leading causes of death among New Yorkers experiencing homelessness, FY2021

Data from the Sixteenth Annual Report on Deaths Among Persons Experiencing Homelessness



There were 640 deaths recorded between July 1, 2020 and June 30, 2021, according to the city's latest annual report. NYC's Chief Medical Examiner investigated 519 of the deaths to determine a cause.

Chart: David Brand | City Limits • Source: NYC Department of Homeless Services, Human Resources Administration and Department of Health and Mental Hygiene • [Get the data](#) • Created with [Datawrapper](#)

Current Statistics on the Prevalence and Characteristics of People Experiencing Homelessness in the United States

(Last Updated July 2011)

Research data describing the national prevalence of homelessness and related issues are limited. In this fact sheet, you will find data from multiple sources, including the U.S. Department of Housing and Urban Development's (HUD) June 2010 Annual Homeless Assessment Report to Congress (AHAR). This fact sheet also includes data from the 1996 National Survey of Homeless Assistance Providers and Clients (NSHAPC). Although these data are older, they represent the most comprehensive study of homelessness to date and are cited to provide historical context. Notes about differing definitions of homelessness are included as needed. **To provide updated resources or ask questions, contact Kristen Paquette at kpaquette@center4si.com.**

Individuals who are Homeless

According to the US Department of Housing and Urban Development's June 2010 Annual Homeless Assessment Report to Congress (2010 AHAR)¹, on a given night in January 2010:

- **407,966** individuals were homeless in shelters, transitional housing programs, or on the streets (this number does not include persons in family households)ⁱ
- **109,812** individuals were chronically homeless, a 1% decrease from the previous year

Over the course of a year (October 2009-September 2010)ⁱⁱ, the 2010 AHAR found that²:

- 1,593,150 individuals experienced homelessness

According to 1996 National Survey of Homeless Assistance Providers and Clients (1996 NSHAPC) data³, **85%** of homeless clients were single.

-
1. Data in the AHAR are comprised of annual point-in-time counts and HMIS data reported throughout the year (October 2009-September 2010). Data are reported based on HUD's definition of homelessness, which includes people in shelters and on the streets, but not those who are "doubled up" with families or friends.
 2. This number represents people who accessed emergency shelter or transitional housing programs.
 3. NSHAPC data only includes people who accessed homeless assistance programs.

Mental Illness & Substance Use

Data from research conducted in the past five years indicates that^{xi xii xiii}:

- **About 30%** of people who are chronically homeless have mental health conditions.
- **About 50%** have co-occurring substance use problems.

According to analyses of data from the 1996 NSHAPC^{xiv}:

- **Over 60%** of people who are chronically homeless have experienced lifetime mental health problems
- **Over 80%** have experienced lifetime alcohol and/or drug problems

have homes. The Substance Abuse and Mental Health Services Administration (SAMHSA) estimates that roughly 38% of the homeless suffer from an alcohol dependency while 26% abuse drugs.

Published by [Chris Carberg](#)



[Battling addiction and ready for treatment? Find Treatment Now](#)

The Correlation Between Addiction and Homelessness

Homelessness is a broad term to describe someone who doesn't have a permanent residence. While homelessness is often associated with living on the street, that is not always the case.

Homeless individuals may live in an emergency shelter, transitional housing, or a car. Alternatively, they may bounce around from place to place, staying with people they know. By definition, anyone who does not have "a regular, adequate, and stable night-time residence" can be considered homeless. According to the National Alliance to End Homelessness, in 2020, more than 500,000 people in the U.S. were considered homeless on a nightly basis.

Homeless people suffer from alcohol and drug addiction at a higher rate than those who have permanent residences. Due to their financial situation, they also don't have access to the level of care needed to address their drug, alcohol, and mental health issues.

Many homeless people find themselves in their current situation due to their addiction. As a result of their [addiction](#), they might have lost their house because they could no longer pay their bills, or their partner or spouse might have thrown them out.

On the flip side, people who are homeless might turn to drugs or alcohol while living on the street as a form of self-medication to numb the proverbial pain of living on the street.

Addiction and Homelessness Statistics

A survey by the United States Conference of Mayors in conjunction with the Substance Abuse and Mental Health Services Administration (SAMHSA) found that 68% of cities reported that substance abuse was the largest cause of homelessness among single adults.

Below are some additional facts and statistics about addiction and homelessness:

- Approximately 38% of all homeless people [abuse alcohol](#)
- About 26% of all homeless people abuse drugs
- Close to two-thirds of homeless veterans suffer from alcohol or drug abuse
- Homeless people are nine times more likely to die from an opioid overdose than the general population

[EXTERNAL] City of yes

Aidan Noonan <



Fri 10/25/2024 5:51 PM

To: Land Use Testimony <landusetestimony@council.nyc.gov>;

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My name is Aidan Noonan, i am a resident at [REDACTED] Glen Oaks 11004. I am opposed to the City of Yes , due to concerns of public transportation, as a college student, my sole way of getting to class is by taking city bussing, as it is taking the bus can take me upwards of 50 minutes, I fear that increasing the number of perminent residents will only cause that time to go up, either by increased number of people taking the bus, or the increased about of road repairs needed. On top of this I also fear that an increased number of houses will have on the power grid.

I have spent my entire life living in Queens. As Queens resident, I enjoy my residential community. Cars are necessary to bring my family to medical appointments and chemotherapy treatments.

I oppose The City of Yes!

A concerned citizen,
Aidan Noonan

[EXTERNAL] I support the city of yes!

Alan Mooiman <



Wed 10/23/2024 11:22 AM

To: Land Use Testimony <landusetestimony@council.nyc.gov>;

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As a resident of Crown Heights, I am writing to urge the council to approve the city's zoning reform proposal. The current zoning regulations are hindering the city's ability to develop and thrive.

I reside in a new 69-unit building that was exempt from parking minimums. The building is fully occupied, so clearly there is demand for housing without parking. In a transit rich city such as ours we should be doubling down on walkable neighborhoods that are accessible to everyone- with wide sidewalks, bus loading areas, and zoning that allows corner stores more broadly.

-Alan Mooiman

From: [Albert Taylor](#)
To: [Land Use Testimony](#); [District3](#); [Speaker Adams](#); [District2](#); [District1](#)
Subject: [EXTERNAL] City of Yes, proposal
Date: Friday, October 25, 2024 12:40:19 PM

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Greetings,

I speak as a 45 year resident of Chelsea and active in the Council of Chelsea Block Associations and the Advisory Committee to the Hudson River Park Trust.

I strongly support the position of Manhattan Community Board 4, that the important effort to improve housing availability is best continued with local control and not with centralized rules that can have detrimental effects that could be avoided with good local community effort. Quality of life should be balanced with quantity of housing units.

Issues include:

1. **Lacks Genuine Affordability Measures:** While the proposal aims to increase housing supply, it fails to include mandates for genuinely affordable housing units. This raises concerns that the new developments will primarily cater to higher-income residents, rather than addressing the needs of low- and moderate-income New Yorkers who are most at risk in the current housing crisis.
2. **Potential to Degrade Housing Standards:** The proposal allows for reduced housing quality standards, such as smaller unit sizes and reduced setback requirements. This could lead to a decline in living conditions, contradicting long-standing efforts to maintain decent and safe housing for all residents.
3. **Insufficient Planning for Infrastructure and Services:** The proposal

does not adequately consider the impact of increased housing density on infrastructure, including schools, hospitals, parks, and transit systems. Without a comprehensive plan to expand these services, the quality of life for existing and new residents could be compromised, leading to overcrowded facilities and strained public resources.

4. **Risk of Overdevelopment and Loss of Community Character:** The transfer of development rights, particularly from landmarks, could result in larger, out-of-scale developments that threaten the unique character of many neighborhoods. This could lead to the displacement of long-term residents and small businesses, as market-driven developments reshape the community fabric.
5. **No Guarantee of Equitable Distribution of Benefits:** The proposal's reliance on market mechanisms overlooks the complex dynamics of housing supply and demand. There is a concern that the benefits of increased supply, such as price stabilization, may not reach the most vulnerable populations, similar to past policies where luxury developments did not alleviate the broader affordability crisis.

There are better solutions with less risk of detrimental unintended consequences if local input is maintained.

Thank you for your consideration,
Albert Taylor

[EXTERNAL] City of Yes

Alec Bardey



Wed 10/23/2024 1:44 PM

To: Land Use Testimony <landusetestimony@council.nyc.gov>;

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Dear Council Members,

I am writing to express my strong support for the City of Yes zoning reform package. As a lifelong New Yorker who has lived in over a dozen different apartments, I have experienced firsthand the struggles of finding affordable rental housing in our city.

The evidence couldn't be more clear: New York City faces a severe and historic housing shortage. The apartment vacancy rate is at its lowest since 1968, at just 1.41%, while median rents are at all time highs. The supply of available housing is clearly not meeting the demand! Over half of renters are rent-burdened, spending more than 30% of their income on rent. This crisis affects all of us, but it's particularly challenging for young people trying to build our lives in this city we love.

City of Yes offers a comprehensive approach to address this crisis. By allowing a little more housing in every neighborhood, we can make a significant impact without dramatic changes to any single area and ensure that every neighborhood does its part. Studies have shown time and time again that cities that build more housing of all kinds are more affordable for everyone.

Importantly, City of Yes would end racist exclusionary zoning practices that have severely limited the types of housing that can be built, contributing significantly to racial segregation and concentration of poverty. Furthermore, it promotes transit oriented development and removes costly minimum parking requirements, which will not only be economically progressive but also help our city meet its climate goals.

For young people like me, these changes could mean the difference between staying in New York or being forced to leave due to housing costs. The proposal's emphasis on creating more affordable units and diverse housing types is crucial for ensuring that New York remains a viable home for the next generation of workers, innovators, and community members.

In conclusion, I urge you to support the City of Yes zoning reform package with as few modifications as possible. It's a critical first step towards addressing our housing crisis, promoting equity, and securing a more affordable and inclusive future for all New Yorkers. Thank you.

Best,

Alec Bardey

From: [Alex Knight](#)
To: [Land Use Testimony](#)
Subject: [EXTERNAL] Lift Parking Mandates NOW!
Date: Friday, October 25, 2024 12:16:51 AM

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Cities much smaller than New York and with much more limited public transit have been ditching parking mandates, including Buffalo and Minneapolis to name just a few. It's past time for New York City to do the same. A city with such robust transit is undermining itself by mandating parking. It's time to move forward and stop making builders include parking.

Thank you,
Alex Knight
Brooklyn, NY

From: [Alex Lefteratos](#)
To: [Land Use Testimony](#)
Subject: [EXTERNAL] Please Remove Parking Mandates
Date: Friday, October 25, 2024 9:20:48 AM

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I am a lifelong New Yorker who owns a car and I even recognize that parking mandates for developments hampers their ability to be made with the pedestrian in mind. It's frankly ridiculous we still have this on the books. We are not Houston.

Best,

Alex Lefteratos

From: [Alexander Schwarz](#)
To: [Land Use Testimony](#)
Subject: [EXTERNAL] City of Yes for Housing Opportunity - Support for Lifting Parking Mandates
Date: Wednesday, October 23, 2024 5:01:39 PM

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My name is Alexander Schwarz, of Bay Ridge, Brooklyn.

I am writing in strong support of City of Yes. This is an incredible opportunity to provide more housing for New Yorkers, which will increase housing availability and affordability, add jobs, revitalize neighborhoods, encourage transit and promote community cohesion.

I'm specifically writing in support of ending parking mandates, a costly, harmful and outdated policy that has been eliminated in many cities, to great success.

Parking mandates impede affordable housing development, increase housing costs and rents and disproportionately burden low-income households with costs.

Building new housing along transit lines reduces emissions, improves access to jobs, boosts neighborhood well-being and makes commuting easier.

The proposal is popular - 74% of New York City voters support lifting parking mandates - with just 17% opposed - according to a new poll from Open New York.

It should be emphasized that ending parking mandates does not harm NYC drivers. In fact it benefits drivers, transit riders and everyone, in that new buildings will only have parking if there's demand for parking, thus eliminating the current problem of mandatory, often-empty parking spaces adding costs for new housing, thus reducing affordability.

Thank you,

Alexander Schwarz

[REDACTED]
Brooklyn, NY 11209

[EXTERNAL] TESTIMONY RE: OPPOSITION OF CITY OF YES

Alexandra Shaheen <>

Wed 10/23/2024 1:30 PM

To: Land Use Testimony <landusetestimony@council.nyc.gov>;

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To whom it may concern,

I am a resident and a homeowner in New York City and vehemently opposed the city of yes, along with many other constituents. Lifting the guard rails on development will change our neighborhoods for the worst and empower developers to make money versus support the communities. Zoning restrictions are important and rampant development is not going to solve housing crises.

Please listen to the voices of the people, who oppose this measure, and refrain from passing the city of yes.

From: [Joshua Maw](#)
To: [Land Use Testimony](#)
Cc: [Joseph, Rita](#); [Piquant, Juvanie](#); [Speaker Adams](#)
Subject: [EXTERNAL] Testimony For Zoning For Housing Opportunity
Date: Thursday, October 24, 2024 10:13:19 PM

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My family and I oppose the City of Yes for Housing Opportunity text amendment. We live in Flatbush Prospect Lefferts Gardens where many blocks are not yet landmarked. Our block enjoys community and connections with its neighbors, some of whom have been residing here for over 40 years. There is a strong commitment to the community from long-time and recent home owners and apartment residents. There is great value in a neighborhood where people aren't forced to leave and can live where they appreciate their neighborhood.

We oppose the Zoning for Housing Opportunity amendments and request that your council members vote "No." These amendments are not ideal. As you are aware, there is not a need for further upzoning to create housing or affordable housing; in fact, there is a need for "right zoning" to preserve the stability of our residential community, historic architecture and small business and ensure that population density does not overwhelm infrastructure, including sewers, public schools, parking, sidewalks, subways and sanitation.

Please support community based planning to allow local community boards and council members to determine where and whether zoning or parking waivers are appropriate in exchange for affordable housing or other community benefits and mitigation of environmental effects. Adding density or reducing parking is appropriate in different places in different communities. Most of District 9 is covered by R6 and R7 zoning that would receive massive density increases, leading to the demolition of most of our neighborhood, with current tenants having to leave and wait years before competing with the rest of the city in a lottery for new apartments.

Support non zoning affordable housing strategies, especially affordable housing preservation. According to the city planning equitable development data explorer, 2/3 of Community District 9 dwelling units are in rent stabilized buildings. In addition, over 25,000 units of buildable housing remain possible under the current zoning.

Thank you for your attention.
Your constituent,
Alice Hooper

From: [Alice Shechter](#)
To: [Land Use Testimony](#)
Subject: [EXTERNAL] No to City of Yes
Date: Wednesday, October 9, 2024 4:49:02 PM

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Mayor Adams's "City of Yes" Housing Opportunity Plan is a gift to developers and will hurt tenants.

This plan has:

- No affordability
- No community control
- Tenant Harassment

Alice Shechter

[REDACTED]

Bronx NY 10464

[EXTERNAL] land use testimony

Alice Thum <>

Wed 10/23/2024 11:48 AM

To: Land Use Testimony <landusetestimony@council.nyc.gov>;

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Hello,

I'm a resident of Astoria, Queens. I'm writing today to express my strong support for lifting parking mandates citywide.

Parking requirements make the city less livable and walkable. They perpetuate a cycle where more parking causes more driving, which in turn creates more demand for parking, necessitating more parking construction and car-centric street design, and on and on. Lifting mandates helps break the cycle and encourage public and active modes of transportation, fostering a more vibrant and accessible streetscape.

The exorbitant cost of building parking also directly contributes to the housing crisis. Cities that have abolished parking mandates have seen a surge in the amount and affordability of new housing created.

In Astoria in particular, our sidewalks are continuously cut through by community driveways/parking, which are both dangerous to pedestrians especially in this residential family neighborhood, and prevent the planting of more trees that could help cool our concrete jungle and prevent flooding during heavy rains. We are in a climate crisis - the research has clearly shown we need to do more to reduce emissions, and we know how to do it. We know car-centric infrastructure is not sustainable nor does it contribute to a prosperous city. It just comes down to whether we want to prioritize fixing our problems, or enabling the few that benefit from this car centric world.

In New York, transportation is the leading cause of greenhouse gas emissions, and personal car usage accounts for more than half of that. Lifting parking mandates promotes greener transportation options, which helps reduce emissions. Parking lots also contribute to flash flood risk and the heat island effect, both of which have disproportionate impacts on communities of color; lifting mandates is a climate justice issue.

I strongly support lifting parking mandates citywide as a critical step towards building more affordable housing, boosting livability, and fostering climate sustainability.

Thank you,
Alice Thum

[EXTERNAL] City of yes

Alicia Kershaw <>

Wed 10/23/2024 10:50 AM

To: Land Use Testimony <landusetestimony@council.nyc.gov>;

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I support the city of yes plans to improve housing.
I specifically support the reduction in parking spot requirements.
I am a 6th generation New Yorker.

Alicia Kershaw



"You can waste your lives drawing lines. Or you can live your life crossing them." —Shonda Rhimes

Testimony for City Council on City of Yes-Housing

My name is Alida Camp. I am a member, and former Chair, of CB8 Manhattan, although I am writing individually.

I urge each City Council Member to vote no..

The short 45-line summary of the entire 800+-page document, does not, for example, state which provisions specifically will deprive Community Boards and City Council Members of input into the land-use process.

1. **The plan does not require affordable housing.**

2. **Landlords warehouse affordable units.**

There are reports that tens of thousands of units are kept off the market. Something is wrong when landlords benefit financially while the city cries in desperation for housing.

This should be stopped before the proposal, which allows extensive changes to the City's landscape, is enacted.

Start with smaller, easy fixes before tackling an 800-page plan that does not mandate affordable housing.

3. **There is no requirement for affordable housing.**

A City needs middle and lower-income residents. They work, often for the government, and should be able to live near where they work. If it weren't for middle income housing, my parents would not have been able to live in the Bronx, where I grew up.

Without a requirement for affordable housing, the plan does nothing to keep New York vibrant.

4. **Using bonuses, the amount of affordable housing created, drops to 16.7% of residential units in that building. This is an unacceptably low figure.**
5. **The plan, in the text but not in the summary, removes Community Board and City Council member input from much of the land use process...** Is this how you envision the City Council, diminished power, diminished opportunities to influence the City's organization and planning.
6. **The City did not provide an adequate opportunity to the public to understand the proposal.** How could an over 800-page proposal be fairly summarized in 45 lines, 3 for each proposal??

No one actually understands what it means.

For example, I spoke to an urban planner about elimination of community input which is hidden in the plan. The removal of community input is not part of the City's summary. Shouldn't there be input on the full plan and not just the portions the City chose to reveal in summaries. Yes, the public could read it, but if the City selectively highlights what it wants, painting it as a fair proposal designed to build a little more housing everywhere, who is going to bother to read the fine print??

7. **The plan is inconsistent with other parts of the City of Yes plan.**

For example, the commercial plan allows commercial use in residential units. How is that consistent with more housing.

The voices of the community have not been heard. I met a black woman who lives in an area of Queens which would be allowed to build more accessory dwelling units. She told me that those units have been destroying the sense of community and neighborhood.

The plan undermines historic districts, a valuable and irreplaceable part of this City.

8. AOC's opinion piece in the Times spells out how affordable housing should be built.

While I generally disagree with her views, I agree on this one. The government should be building housing. Until then, affordable housing, not more market rate, should be a priority. Those who can afford market rate will find housing. Those who work for the City, the nurses, bus drivers, government reps and their staffers, musicians, dancers, museum workers, teachers, sanitation workers, police, and firefighters, need housing. Please read the piece if you haven't already.

AOC and Tine Smith, Our Solution to the Housing Crisis, September 18.

Scott Stringer made the same point as Comptroller. He noted, approximately 5-6 years ago, that the City had 1000 pieces of land on which it could build affordable housing. The City should not rely on for-profit developers to build what will only cut into their profits or for which they will exact too much recompense from the City. They have no motivation to build anything other than market-rate, profitable housing.

9. More time needs to be spent reviewing the proposal. It tries to do too much, which isn't fair to anyone.

10. The Mayor's motives should be looked at more closely.

This proposal does only one thing — provide more market rate housing, allowing developers to determine the course of the City without community input and without a plan.

When read in conjunction with the Mayor's plan to eliminate environmental review of many buildings, this spells trouble for the City. If you are a proponent of congestion pricing, eliminating environmental review and responsibility is a far bigger load on the environment. Already, most emissions come from buildings. Already, there is a heat effect coming into Manhattan. I feel a heat effect on the Upper East Side, even compared to the West Side where buildings are lower and fewer.

Without responsibility, what will the City be like.

This plan denies the responsibility of the Administration to ensure that the level of new housing the Plan would allow as-of-right is in the best interest of the entire City.

11. Non-residents buy or rent far too many residential units without living in New York full, or close to full time.

The New York Times recently published statistics that approximately 24% of residential units are used by owner here for a few weeks of the year. Taxing those owners would allow the City government to build permanent affordable units without either hoping for the good will of developers or giving away the store to developers to encourage affordable housing construction.

Those owners do nothing for their communities or the City as a whole, while they take far more. They take in the sense that the land, which could be used for housing for those who actually live here, and they take because their buildings, through the extensive amenities provided to lure the wealthy, use up city resources. When they are here, they use City resources without benefiting the City.

12. Affordable housing units will be demolished, replaced by market-rate housing.

This has happened on the Upper East Side, where more than 10,000 affordable units have been lost.

The City of Yes is too much. While zoning is changed enormously, there has been little effort to inform the public of the vast changes. Who could comprehend and absorb the extent and type of changes that the proposal would implement. There are too many details on too many pages, but too little highlighting of the effect of the changes on the community and the City.

This is a gift to for-profit developers. You should not sign the card.

Please vote No.

[EXTERNAL] City of Yes, Against

Henry Euler <[REDACTED]>

Fri 10/25/2024 3:46 PM

To: Land Use Testimony <landusetestimony@council.nyc.gov>;

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To the Subcommittee on Zoning and Franchises:

I am against the City of Yes Housing Opportunity proposal. I believe this will ultimately destroy the character of my community here in Bayside, Queens. This is definitely a one size fits all proposal.

Why would the City Planning Commission even consider this when we know that every community has its own needs and characteristics. I also understand that the plan will do little for people who need affordable housing. Those making really low wages will not be helped with this proposal.

I watched the hearing during your committee meeting the other day. Toward the end, groups of young men were called up to speak in the chamber, almost all in favor of the proposal. It was very strange that so many people showed up at the last minute like that. Sort of like it was planned to shore up the number of "in favor" votes.

I am opposed to the proposal. ADUs, transit oriented development, town center development, elimination of parking requirements for new construction all are nightmares. I hope there'll be many changes considered before a vote is taken on this proposal.

Aline Euler

[REDACTED]

From: [alison mckenna](#)
To: [Land Use Testimony](#)
Subject: [EXTERNAL] City of Yes for Housing Opportunity
Date: Thursday, October 24, 2024 5:14:06 PM

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I am a driver and a cyclist (e-bike now, which are also in dire need of protective laws--that is for another email) and I support **City of Yes** 100%.

Truly affordable housing (not developers' definition, a Cost of Living definition, please) need to expand, and not in Transit Deserts.

Expanding transit and better protected bike lanes/pedestrian plazas, car free/bus-only streets are all necessary for environmental gains, usable spaces, increased infrastructure, transit options, and housing for all in our city.

Please pass City of Yes!

Alison McKenna
Jackson Heights, NY (home)
Astoria, NY (workplace and former favorite home town)

From: [Alison Winters](#)
To: [Land Use Testimony](#)
Subject: [EXTERNAL] NO to city of yes zone changes
Date: Wednesday, October 9, 2024 4:57:34 PM

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I am against the proposed zoning changes associated with city of yes. I do not want any changes to zoning and want to protect City Island Special District Zoning.

Alison Winters



City island 10464

[EXTERNAL] Land Use Testimony

Allen Cheng <

Wed 10/23/2024 12:14 PM

To: Land Use Testimony <landusetestimony@council.nyc.gov>;

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Hello,

I'm a resident of Astoria, Queens. I'm writing today to express my strong support for lifting parking mandates citywide.

The exorbitant cost of building parking directly contributes to the housing crisis. Cities that have abolished parking mandates have seen a surge in the amount and affordability of new housing created.

Parking requirements also make the city less livable and walkable. They perpetuate a cycle where more parking causes more driving, which in turn creates more demand for parking, necessitating more parking construction and car-centric street design, and on and on. Lifting mandates helps break the cycle and encourage public and active modes of transportation, fostering a more vibrant and accessible streetscape.

In Astoria in particular, our sidewalks are continuously cut through by community driveways/parking, which are both dangerous to pedestrians, especially in this residential family neighborhood, and prevent the planting of more trees that could help cool our concrete jungle and prevent flooding during heavy rains. We are in a climate crisis - the research has clearly shown we need to do more to reduce emissions, and we know how to do it. We know car-centric infrastructure is not sustainable nor does it contribute to a prosperous city. It just comes down to whether we want to prioritize fixing our problems, or enabling the few that benefit from this car centric world.

In New York, transportation is the leading cause of greenhouse gas emissions, and personal car usage accounts for more than half of that. Lifting parking mandates promotes greener transportation options, which helps reduce emissions. Parking lots also contribute to flash flood risk and the heat island effect, both of which have disproportionate impacts on communities of color; lifting mandates is a climate justice issue.

I strongly support lifting parking mandates citywide as a critical step towards building more affordable housing, boosting livability, and fostering climate sustainability.

Thank you,
Allen Cheng

From: [Allison Considine](#)
To: [Land Use Testimony](#)
Subject: [EXTERNAL] City of Yes for Housing Opportunity
Date: Friday, October 25, 2024 11:11:55 AM

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Hi,

I'm writing to express my strong support for ending parking mandates. Like millions of my fellow New Yorkers, I rely on public transit, my own two feet and my bike to get around our city. I rely on housing near transit, and to keep rents affordable, I want to see more affordable housing near transit- and removing parking mandates will make that easier and cheaper.

Thank you!
Allison Considine

[EXTERNAL] City of Yes, Please!

Allison Kiteley <[REDACTED]>

Wed 10/23/2024 10:43 AM

To: Land Use Testimony <landusetestimony@council.nyc.gov>;

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Hello,

My name is Allison Kiteley, I'm a resident of Bed-Stuy. I was really excited to see the City of Yes proposal, New York is already the greatest city of America but it's been long in need of an update to bring it to its full potential as a cosmopolitan paradise. A New York City with more housing could help us fight back against ever rising rents, keeping native New Yorkers in their homes while also making room for new residents.

It's been a disappointment to see so much of it picked apart. Removing the parking requirement doesn't even reduce the amount of parking, it just means there won't be more. Don't even drivers wish the number of cars would stop rising? This just increases traffic (and therefore pollution) for all of us. The loss of the bodega aspect is especially a loss, people may not like local commerce for some reason, but in my view it's a safety issue. Having stores and therefore people around makes walking the streets safer for women like me.

I believe in a vision of a New York that feels like a truly modern city, one that acknowledges climate change, with robust public transit access, affordable housing, and ample jobs. These changes are nowhere close to enough to get us there, but it's a first step, and I hope we can take it.

Best regards,
Allison

[EXTERNAL]

Alyssa Azzara <>

Wed 10/23/2024 3:31 PM

Inbox

To: Land Use Testimony <landusetestimony@council.nyc.gov>;

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I oppose the rezoning!

From: [Alyssa Manfredonia](#)
To: [Land Use Testimony](#)
Subject: [EXTERNAL] City of Yes- City Island_ Alyssa Manfredonia
Date: Thursday, October 24, 2024 5:06:21 PM
Attachments: [Feedback worksheet_Effect on City Island.pdf](#)
[City Island_Effects of City of Yes.pdf](#)

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Good Afternoon

My name is Alyssa Manfredonia and I made a formal verbal testimony on Tuesday evening against the city of yes. After speaking, chairman Riley asked me and additional questions in regards to if I oppose the proposal in full or just because of City Island.

For the record I oppose the full proposal for all low density areas

After explaining- the chairman stated that I would not need to worry as the City Island Special District would not be changing. While this is true and we are grateful for this, **the current Special district codes would still not protect us from the City of Yes Proposal.**

Please see the attached feedback worksheet giving detail as to how each proposal of the City of Yes would affect City Island **even with Special District Zoning.**

Also attached is a markup of the existing and proposed zoning codes changes that directly state how and why this would be changed. There are also some examples to show the bulk changes that would still affect our residential districts even with our Special protections.

The special district zoning would protect out commercial zones from being over developed but the code changes proposed within the zones themselves would not be protected by the special district and would allow an increase in development and population which our geography and infrastructure cannot support.

The City of yes should not be approved entirely for any low district areas especially City Island even if the Special District Zone remains.

Sincerely ,

Alyssa Marie Manfredonia, R.A, AIA
AMArchitecture LLC
[REDACTED]
New Rochelle, NY 10801
[REDACTED]

www.amarchitectureny.com

City of Yes for CITY OF YES EFFECTS ON CITY ISLAND EVEN WITH OUR SPECIAL DISTRICT Housing Opportunity

Instructions: This worksheet is for anyone who chooses to express their support or concerns. If you choose to complete this optional worksheet, please review each part of the proposal. Check the box to express whether you support or do not support that specific goal or project component. You can leave notes in the comments section.

Low-Density

Town Center Zoning



Re-introduce buildings with groundfloor commercial and two to four stories of housing above, in areas where this classic building form is banned under today's restrictive zoning.

Support

☐

Do Not Support

Transit-Oriented Development



Allow modest, three-to-five story apartment buildings where they fit best: large lots within half a mile of subway or Rail stations that are on wide streets or corners.

Support

☐

Do Not Support

☐

Accessory Dwelling Units



Permit accessory dwelling units such as backyard cottages, garage conversions, and basement apartments.

Support

☐

Do Not Support

☐

District Fixes



Give homeowners additional flexibility to adapt their homes to meet their families' needs.

Support

☐

Do Not Support

☐

Medium and High Density

Universal Affordability Preference



Allow buildings to add at least 20% more housing if the additional homes are permanently affordable. This proposal extends an existing rule for affordable senior housing to all forms of affordable and supportive housing.

Support

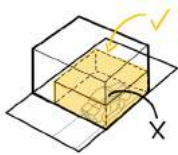
☐

Do Not Support

☐

Citywide

Lift Costly Parking Mandates



Eliminate mandatory parking requirements for new buildings. Parking would still be allowed, and projects can add what is appropriate at their location.

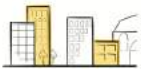
Support

☐

Do Not Support

☐

Convert Non-Residential Buildings to Housing



Make it easier for underused, nonresidential buildings, such as offices, to be converted into housing.

Support

☐

Do Not Support

☐

Small and Shared Housing



Re-introduce housing with shared kitchens or other common facilities. Eliminate strict limits on studios and one-bedroom apartments.

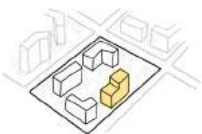
Support

☐

Do Not Support

☐

Campus Infill



Make it easier to add new housing on large sites that have existing buildings on them and already have ample space to add more, (e.g., a church with an oversized parking lot).

Support

☐

Do Not Support

☐

Miscellaneous

New Zoning Districts

Create new Residence Districts requiring Mandatory Inclusionary Housing that can be mapped in central areas in compliance with state requirements. (citywide)

Support

☐

Do Not Support

☐

Update to Mandatory Inclusionary Housing

Allow the deep affordability option in Mandatory Inclusionary Housing to be used on its own. (citywide)

Support

☐

Do Not Support

☐

Sliver Law

Allow narrow lots to achieve underlying Quality Housing heights in R7-R10 districts.

Support

☐

Do Not Support

☐

Quality Housing Amenity Changes

Extend amenity benefits in the “Quality Housing” program to all multifamily buildings, and update to improve incentives for family-sized apartments, trash storage and disposal, indoor recreational space, and shared facilities like laundry, mail rooms, and office space. (citywide)

Support

☐

Do Not Support

☐

Landmark Transferable Development Rights

Make it easier for landmarks to sell unused development rights by expanding transfer radius and simplifying procedure. (citywide)

Support

☐

Do Not Support

☐

Railroad Right-of-Way

Simplify and streamline permissions for development involving former railroad rights of way. (citywide)

Support

☐

Do Not Support

☐

City of “Yes” Housing Opportunity

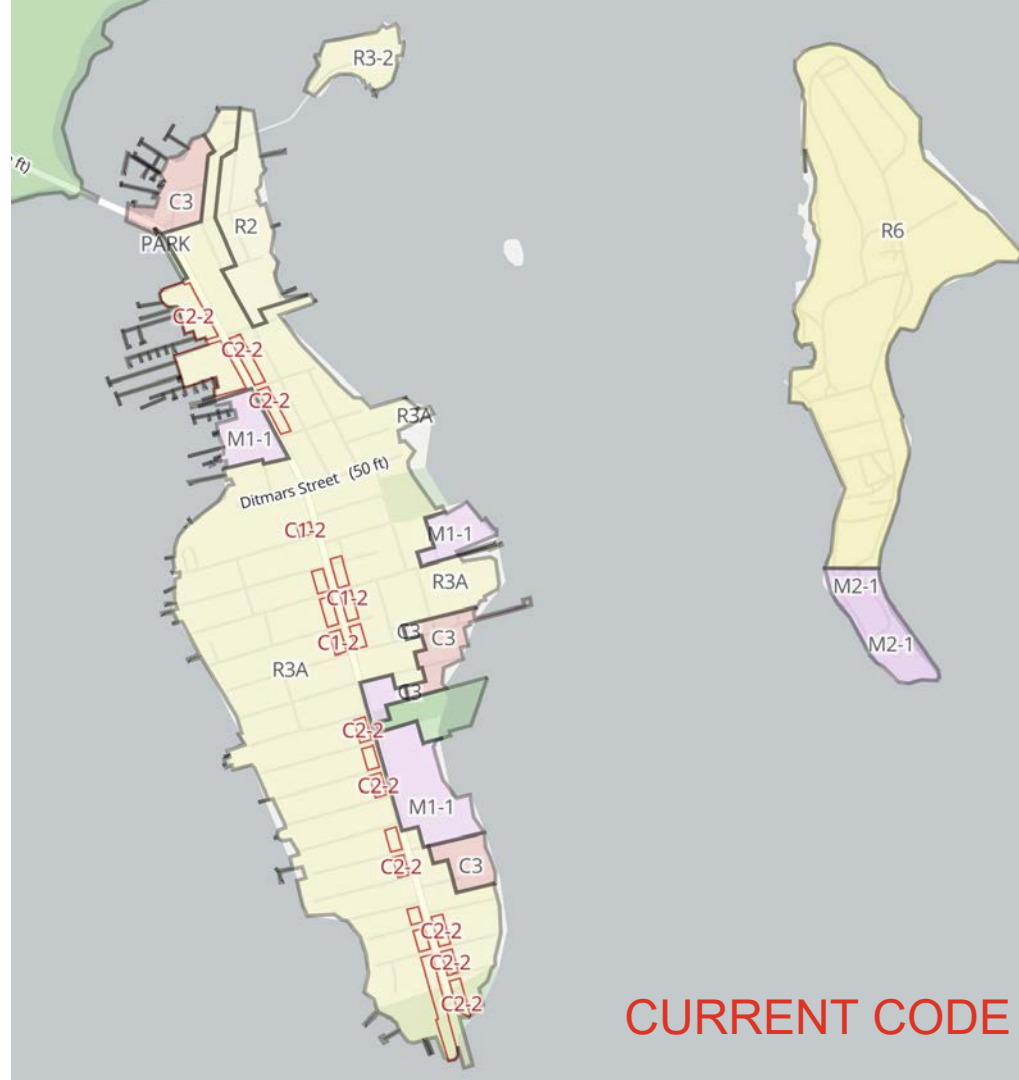
Direct Effects on City Island

*-Even with Special District

& the Changes to Community Board 10
- City Island Neighborhood

Current Districts On City Island

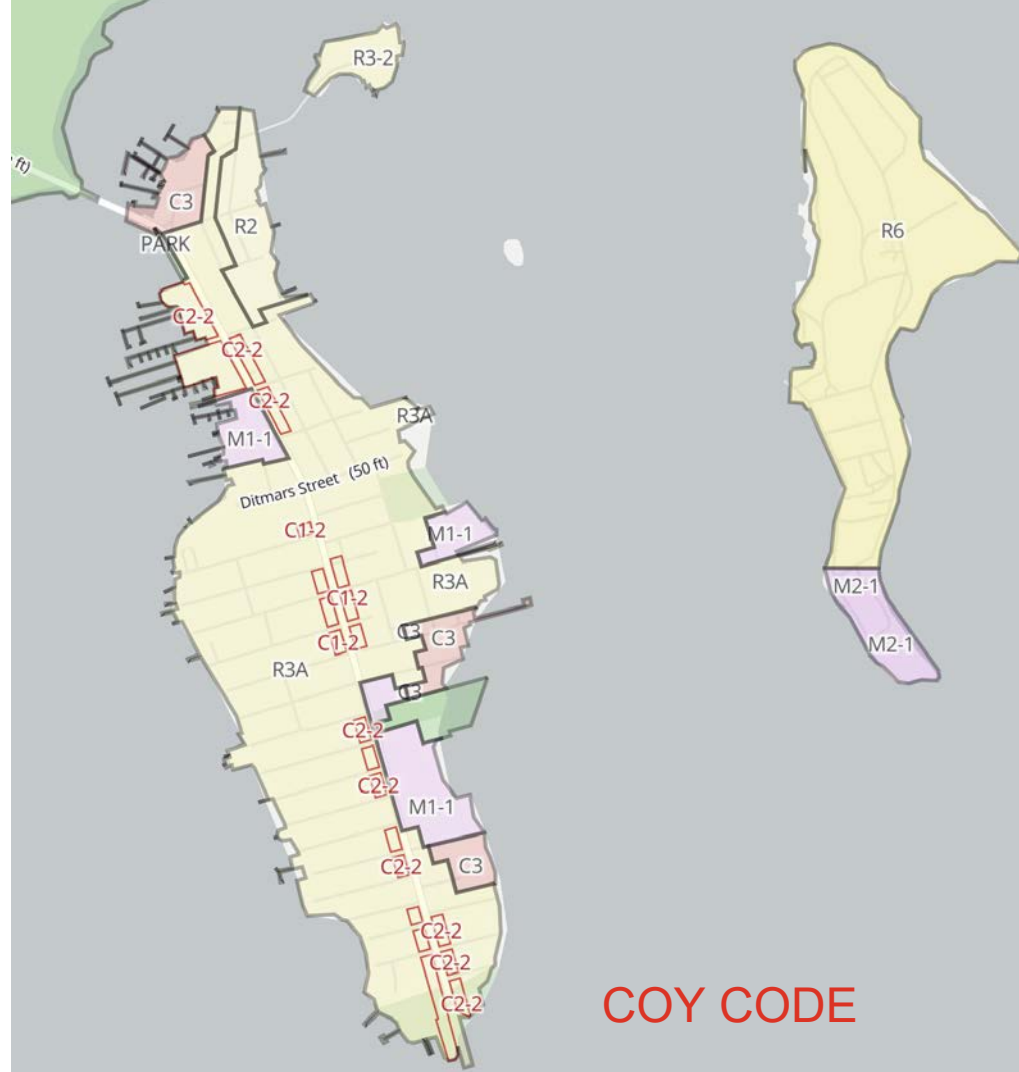
- ➔ R2 - (Single Family Detached Residential)
- ➔ R3A - (Detached Residential)
- ➔ C1-2 (Local Retail District)
- ➔ C2-2 (Local Service District)
- ➔ C3 (Waterfront Recreation)
- ➔ M1-1 (Light Manufacturing)



City of Yes Districts On City Island

- R2 - (~~Single Family~~ Detached Residential)
- R3A - (Detached Residential)
- C1-2 (Local ~~Retail~~ Commercial District)
- C2-2 (Local ~~Service~~ Commercial District)
- C3 (Waterfront Recreation)
- M1-1 (Light Manufacturing)

**While the zoning map does not change, the zones are revised to remove single family from R2 zones as well has label the C zones as commercial districts removing the retail / service aspect*



New Terms: COY CODE

1. An “ancillary dwelling unit” is an additional #dwelling unit#, permitted on the same #zoning lot# as a #single-# or #two-family residence# that does not exceed eight hundred square feet of #floor area#. Only one #ancillary dwelling unit# shall be permitted per every #single-# or #two-family residence# on a #zoning lot#. In the #high-risk flood zone#, as defined in Section 64-11, no #ancillary dwelling unit# shall be permitted in a #basement# or #cellar#.
2. Existing terms like Expanded transit zone, transit zone, have been omitted & replaced with the following
3. A “qualifying transit-accessible site” (12-11) is a zoning lot that is (pg 29.)
 - a. in a R1 through R5 District, and meetings the following: Has a minimum lot size of 5000 sf, Is located in a greater transit zone and has frontage along a wide street (75’ min,) or along the short dimensions of a block.
 - b. In a R1 thought R5 district is located within the greater transit zone and contains a community facility
 - c. In a R1 thought R5 district is located outside of the greater transit zone and contains a community facility that is existing
 - d. In a C1, C2 or C4 district mapped within or with a residential equivalent of an R1 through R5 district
 - e. In a M1 district paired with a R1 thought R5 district
4. A “Greater Transit Zone” (12-11) is an area comprised of both the “Inner Transit Zone and Outer Transit Zone”
 - a. Inner Transit Zone is an area showing boundaries in APPENDIX I
 - b. Outer Transit Zone is an area outside of the inner transit zone that is comprised of blocks that are wholly or partially within a half-mile of mass transit station as per 66-11(66-11: For the purposes of this Chapter, “mass transit station” shall refer to any subway or rail *mass transit station* operated by a *transit agency*.

New Terms: COY CODE

1. An “**ancillary dwelling unit**” is an additional #dwelling unit#, permitted on the same #zoning lot# as a #single-# or #two-family residence# that does not exceed eight hundred square feet of #floor area#. Only one #ancillary dwelling unit# shall be permitted per every #single-# or #two-family residence# on a #zoning lot#. In the #high-risk flood zone#, as defined in Section 64-11, no #ancillary dwelling unit# shall be permitted in a #basement# or #cellar#.
2. Existing terms like Expanded transit zone, transit zone, have been omitted & replaced with the following

1, #3 would affect how city island is developed significantly

New Terms:

Key Terms

Key terms that appear throughout the *City of Yes*

Affordable

As a rule of thumb, a home is considered affordable if it costs less than 30% of a household's income. Naturally affordable housing meets this measure when it's available on the open market. Income-restricted affordable housing – which is created through tax incentives or public subsidies – requires households to meet a legally-defined income to qualify for the housing.

Area Median Income (AMI)

A measure of affordability determined yearly by the U.S. Department of Housing and Urban Development. AMI determines the eligible income levels for affordable housing. In New York City, this measure is based on market rents.

As-of-right Development

Development that follows zoning regulations (as opposed to development that would require zoning changes to be built). As-of-right development involves limited City approvals and does not need to go through a public review process.

Mandatory Inclusionary Housing area

A “Mandatory Inclusionary Housing area” is a specified area in which the Inclusionary Housing Program is applicable, pursuant to the regulations set forth for such areas in Section 23-90 (INCLUSIONARY HOUSING) 27-00 (ADMINISTRATION), inclusive. The locations of

Commented [Z22]: TBD if other modifications are necessary

The City of Yes proposal removes a lot of language/ text that “protected” low density areas as well as the communities. Currently, anything that is not “as of right” must be reviewed and approved by the required city boards as well as having public hearings to involve the community. These boards are important because they allow the public's voice to be heard and it also allows the City Boards to a more in depth study of the project for uses/ sizing that is currently not permitted. For example, these boards ask questions to the answers in regards to environmental studies, traffic information, site developments, infrastructure, sewer, stormwater etc.

The City of Yes proposal is making uses and sizes of developments “As of right” that were not permitted before- resulting in no public hearings and no City boards which would result in no in depth analysis of these development

City of Yes Districts - Residential Changes

21-10

PURPOSES OF SPECIFIC RESIDENCE DISTRICTS

[ALIGNING WITH PROPOSAL TO INCLUDE ADDITIONAL HOUSING TYPES IN SOME EXISTING DISTRICTS AND CREATING NEW DISTRICTS]

21-11

R1 and R2 — Single-Family Detached Residence Districts

These districts are designed to provide a suitable open character for single-family detached dwellings at low densities, as well as multiple dwellings in appropriate locations. These districts also include community facilities and open uses that serve the residents of these districts or benefit from an open residential environment.

21-12

R2X — Single-Family Detached Residence District

This district is designed to provide for large single-family detached dwellings on narrow zoning lots, as well as multiple dwellings in appropriate locations. This district also includes community facilities and open uses that serve the residents of the district or benefit from a residential environment.

This district may be mapped only within the Special Ocean Parkway District as well as Community Districts 8 and 14 in the Borough of Queens.

21-13

R3A, R3X and R4A — Detached Residence Districts

These districts are designed to provide for single- or two-family detached dwellings on zoning lots of specified lot widths, as well as multiple dwellings in appropriate locations. R3A Districts also permit zero lot line buildings. These districts also include community facilities and open uses that serve the residents of these districts or benefit from a residential environment.

Commented [Z2]: The Proposal updates the title and language for R1 and R2 districts to reflect the allowance for apartment buildings in certain locations. In addition, R2X would be folded back in to this section to reflect changes made to it.

R2- REMOVED SINGLE FAMILY, ADDED MULTIPLE DWELLINGS TO THE TEXT TO PERMIT IN CERTAIN LOCATIONS

Commented [Z3]: The Proposal updates the descriptions of other low density districts to also reflect the allowance for apartment buildings in certain locations.

R3A- ADDED MULTIPLE DWELLINGS TO THE TEXT TO PERMIT IN CERTAIN LOCATIONS

The single family removal and the additional notation of "Multi family" would make this a "as of right condition"

What this means is that, its permitted so in the past when someone wanted to put a multi family in a single-two family zone they would have to apply for a variance, and city boards to get this approval. The board meetings are public hearings which means the public can speak and be aware of the proposed work

If this is "as of right" due to the new zoning changes, no public meeting would be required resulting in the use just being permitted

CITY OF YES WOULD PERMIT R3A ZONE MULTI-FAMILY WHICH WAS NOT PREVIOUSLY ALLOWED

THE CURENT SPECIAL DISTRICT CODE WOULD NOT PROTECT THIS

R2 & R3A Districts

Changes to Residential districts

Bulk / Use Changes: Residential Districts

<u>R2: Detached Residential</u>			
<i>1-2 Family Use</i>	<u>CURRENT</u>	<u>CITY OF YES</u>	<u>QUAL. TRAN. SITE</u>
LOT WIDTH	40 FT.	30 FT.	-
LOT AREA	3800 SF.	2850 SF.	-
FAR (FLOOR AREA RATIO)	.5	.75	1.00
FRONT YARD	15 FT.	15 FT.	5 FT.
REAR YARD	30'	20'	-
1 SIDE YARD	5 FT.	5 FT.	-
BOTH SIDE YARD	13 FT.	10 FT.	-
BASE HEIGHT	21 FT.	25 FT.	-
MAX. HEIGHT	35 FT.	35 FT.	-
LOT COVERAGE	.50	60% / 80% CORNER	60% / 100% CORNER

<u>R3A: Detached Residential</u>			
<i>1-2 Family Use</i>	<u>CURRENT</u>	<u>CITY OF YES</u>	<u>QUAL. TRAN. SITE</u>
LOT WIDTH	25 FT.	25 FT.	-
LOT AREA	2375 SF.	2375 SF.	-
FAR (FLOOR AREA RATIO)	.5	.75	1.00
FRONT YARD	10 FT.	10 FT.	5 FT.
REAR YARD	30'	20'	-
1 SIDE YARD	0 FT.	0 FT.	-
BOTH SIDE YARD	8 FT.	5 FT.	-
BASE HEIGHT	21 FT.	25 FT.	-
MAX. HEIGHT	35 FT.	35 FT.	-
LOT COVERAGE	N/A	60% / 80% CORNER	60% / 100% CORNER

City of Yes Zoning Code: 23-331 / 23-341 / 23-361

CITY OF YES WOULD PERMIT ZONE BIGGER BULK WHICH WAS NOT PREVIOUSLY ALLOWED THE CURENT SPECIAL DISTRICT CODE WOULD NOT PROTECT- ONLY THE HEIGHT IS PROTECTED

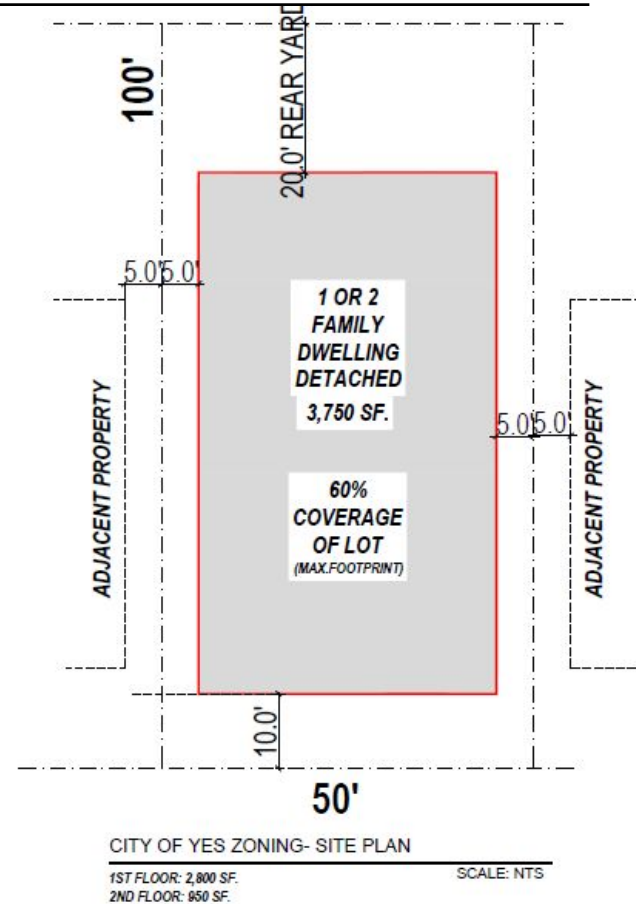
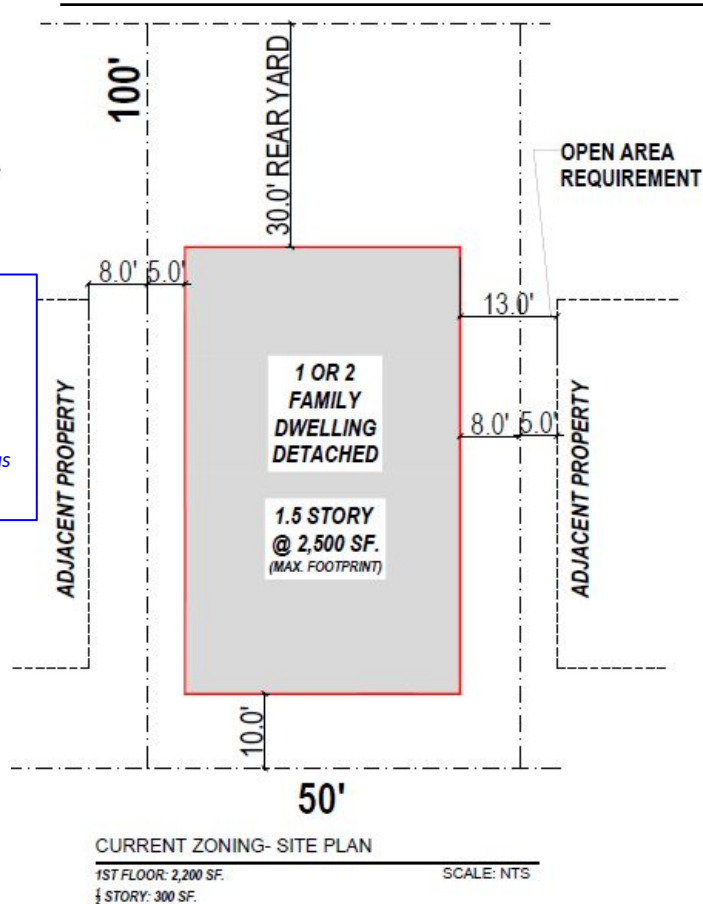
R2 Example:

- Additional 1250 sf. In FAR
- Additional 600 sf. In Coverage
- Smaller side yards
- Smaller rear yard

New Single / 2 family homes would be able to built bigger, and closer to one another.

They would also have no requirement for parking

The max. Height would still be capped at 35' as per the current code



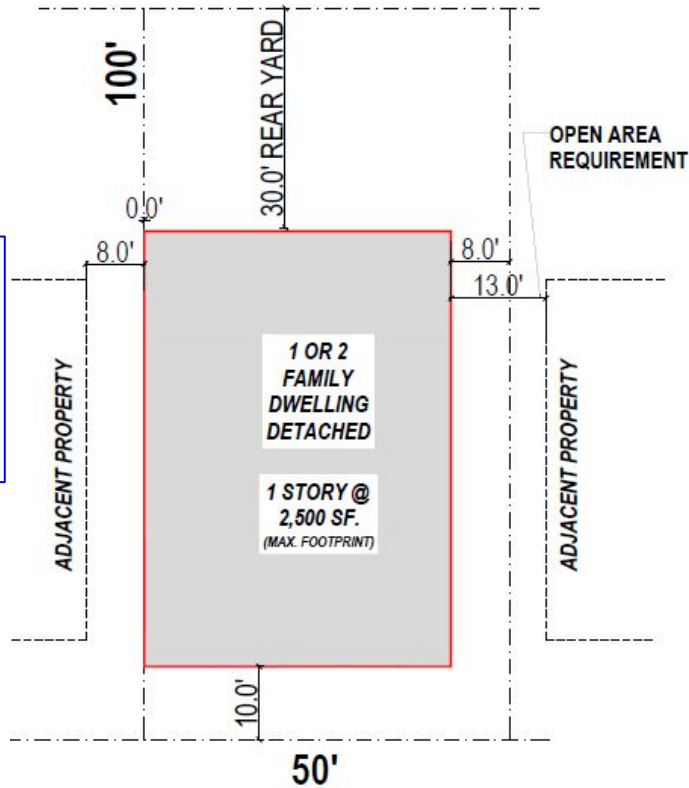
R3A Example:

- Additional 1250 sf. In FAR
- Additional 500 sf. In Coverage
- Smaller side yards
- Smaller rear yard

New Single / 2 family homes would be able to built bigger, and closer to one another.

They would also have no requirement for parking

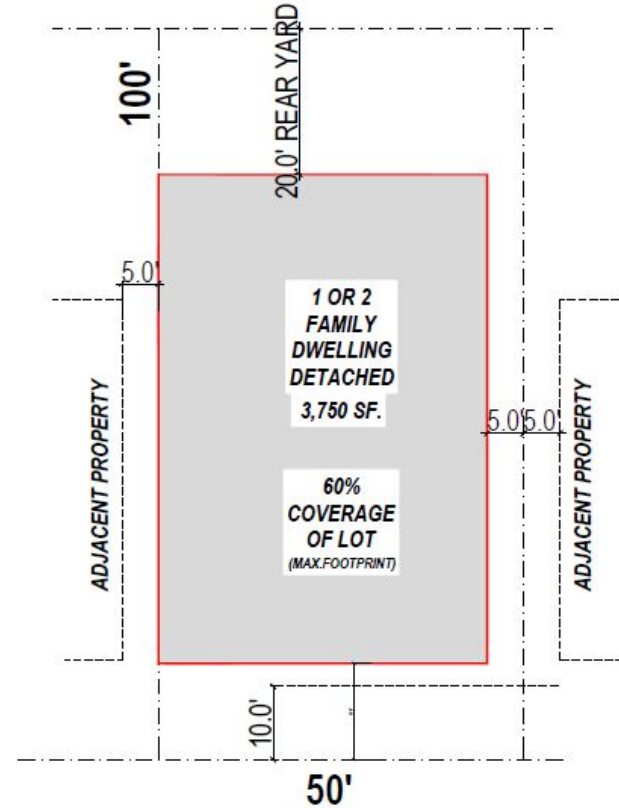
The max. Height would still be capped at 35' as per the current code



CURRENT ZONING- SITE PLAN

1ST FLOOR: 2,500 SF.

SCALE: NTS



CITY OF YES ZONING- SITE PLAN

1ST FLOOR: 3,000 SF.
2ND FLOOR: 750 SF.

SCALE: NTS

Additional Changes: Residential Districts

- REMOVED DU FACTOR (DWELLING UNIT FACTORS) -500 sf per unit now (23-52)
- PERMIT ADU ON SINGLE / TWO FAMILY LOTS (12-16)
- REMOVED OPEN AREA REQUIREMENTS BETWEEN ADJACENT SIDE YARDS (Omitted)
- Provide clarification on balcony requirements (23-62)
- Additional stipulations for allowing long term care facilities in R2 / R3A (24-111)
- NO OFF SITE PARKING REQUIRED FOR NEW BUILDINGS IN RESIDENTIAL (25-21)
- CAN REMOVE PARKING FOR EXISTING 1-2 FAM. BUILDINGS IN RESIDENTIAL (25-232)
- WAIVER FOR PARKING FOR MIXED USE REQUIRED (25-37)
- R2 districts now permit rental of off street parking space (25-41)
- Parking spot size reduced to 300 sf., current code is 400 sf. (25-62(4))
- FAR definition - removed attic allowance of 5' height for FAR due to increase of FAR (now .75) (12-10)

COY CHANGES

Additional Changes: Residential Districts

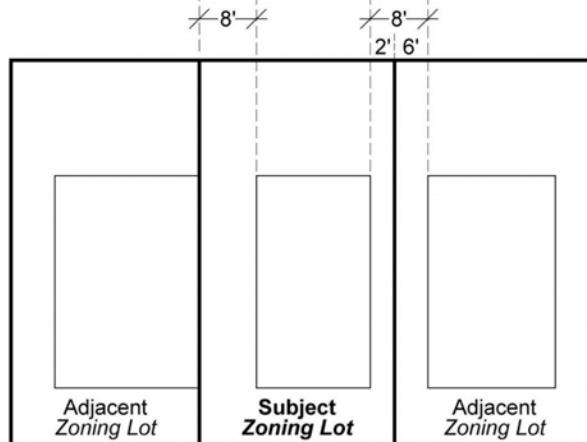
- REMOVED DU FACTOR (DWELLING UNIT FACTORS) -500 sf per unit now *Small apartments, more densely populated buildings allowed*
- PERMIT ADU ON SINGLE / TWO FAMILY LOTS *2 family lots can have another small unit on the property / in the dwelling- totaling 3* (12-16)
- REMOVED OPEN AREA REQUIREMENTS BETWEEN ADJACENT SIDE YARDS *1-2 family lots can have building much closer to one another*
- Provide clarification on balcony requirements (23-62)
- Additional stipulations for allowing long term care facilities in R2 / R3A (24-111)
- NO OFF SITE PARKING REQUIRED FOR NEW BUILDINGS IN RESIDENTIAL *No parking required for new 1-2 family lots* (25-21)
- CAN REMOVE PARKING FOR EXISTING 1-2 FAM. BUILDINGS IN RESIDENTIAL *Existing 1-2 family properties can eliminate parking on property*
- WAIVER FOR PARKING FOR MIXED USE REQUIRED *Mixed use buildings can get parking waived* (25-37)
- R2 districts now permit rental of off street parking space *R2 can rent there on property personal spot* (25-41)
- Parking spot size reduced to 300 sf., current code is 400 sf. (25-62(4))
- FAR definition - removed attic allowance of 5' height for FAR due to increase of FAR (now .75) (12-10)

CITY OF YES WOULD PERMIT ZONE BIGGER BULK WHICH WAS NOT PREVIOUSLY ALLOWED THE CURRENT SPECIAL DISTRICT CODE WOULD NOT PROTECT US FROM THESE CHANGES

Additional Changes: Residential Districts

- REMOVED OPEN AREA REQUIREMENTS BETWEEN ADJACENT SIDE YARDS (Omitted)
- Side Yard Changes- where?
- Current code 23-461 has open air regulations that permits a minimum 8 ft. required setback between buildings containing residences on adjacent properties
- R3A with a zero lot line condition- no more required open area setbacks
- I do not see any language for this in the City of Yes Proposal

Open area at least 8' wide required between residential buildings



From my understanding this has been omitted
1-2 family lots can have building closer to one another

(3) — Permitted obstructions in open areas between buildings

Only accessory mechanical equipment limited in depth to 18 inches from an exterior wall, chimneys, downspouts, eaves, gutters, open off-street parking spaces, qualifying exterior wall thickness, ramps for access by people with disabilities, and steps as set forth in the applicable provisions of Section 23-44, inclusive, shall be permitted obstructions in open areas required pursuant to paragraphs (c)(1) and (c)(2) of this Section, provided that such obstructions, not including accessory off-street parking spaces, qualifying exterior wall thickness or accessory mechanical equipment, may not reduce the minimum width of the open area by more than three feet.

(4) — Minimum side yard requirements for zoning lots adjacent to certain side yards

A side yard at least five feet wide shall be provided on any zoning lot along the common side lot line of any adjacent zoning lot with an existing detached residence whose side yards total at least 13 feet in width, with both side yards on such adjacent zoning lot at least five feet in width, or with an existing semi-detached residence with a side yard at least eight feet in width. (See Figure C)

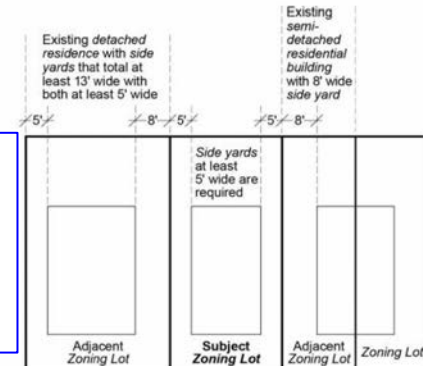


Figure C
(23-461c4)

Additional Changes: Residential Districts

→ **PERMIT ADU ON SINGLE / TWO FAMILY LOTS**

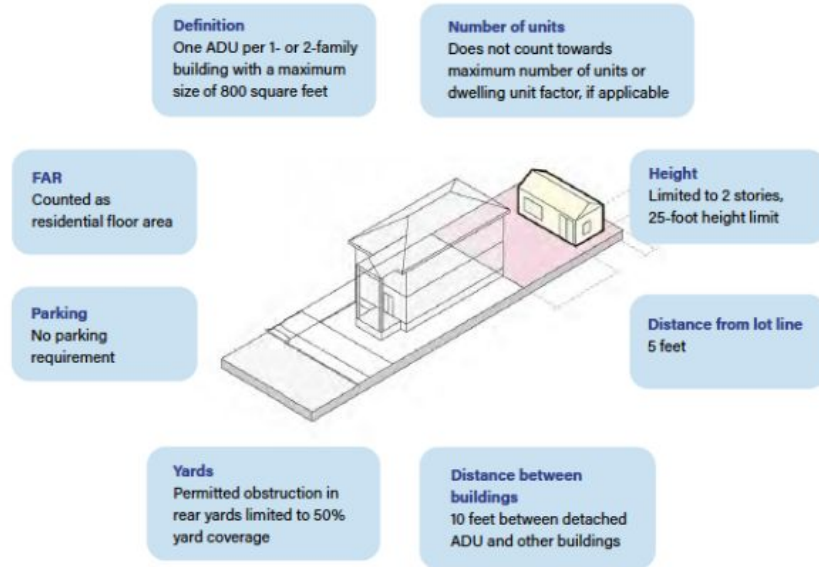
→ **Does not count towards the dwelling units-**

Essentially permits 3 Families on all lots

→ An **"ancillary dwelling unit"** is an additional #dwelling unit#, permitted on the same #zoning lot# as a #single-# or #two-family residence# that does not exceed eight hundred square feet of #floor area#. Only one #ancillary dwelling unit# shall be permitted per every #single-# or #two-family residence# on a #zoning lot#. In the #high-risk flood zone#, as defined in Section 64-11, no #ancillary dwelling unit# shall be permitted in a #basement# or #cellar#.

Ultimately permits 3 families on a 2 family lot with no parking requirements

Accessory Dwelling Units would not count towards the maximum number of units or the "dwelling unit factor," which is the minimum average unit size (learn more on page 40). This means that single-family homes in single-family districts would be able to add an ADU.



Allow Conversions of Existing Structures

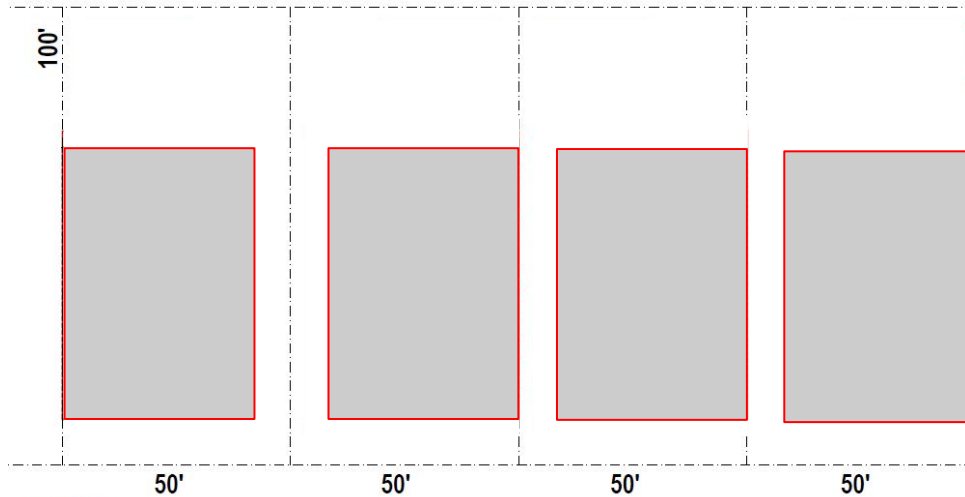
This proposal also extends flexibility to convert existing structures into ADUs under a noncompliance provision. Existing structures, such as detached garages, would be allowed to convert into ADUs even if that introduces a new noncompliance – for example, exceeding FAR limits. However, a wholly new space could not be added. This noncompliance provision may support the legalization of some existing informal units.

R3A with ADU

Example:

- No parking required
- Additional 500 sf. In Coverage
- Smaller side yards
- Smaller rear yard
- Essentially 3 families permitted
- This can also be permitted in basements / cellars and promotes working to legalize current non-code compliant units
- ***no basement of cellar units permitted in coastal zones*

CURRENT CODE



OVERLAY R3A

SCALE: NTS

City of Yes Zoning Code: 23-331 / 23-341 / 23-361

Example of 4 Adjacent Lots in a R3A zone built to max. Coverage as per current zoning

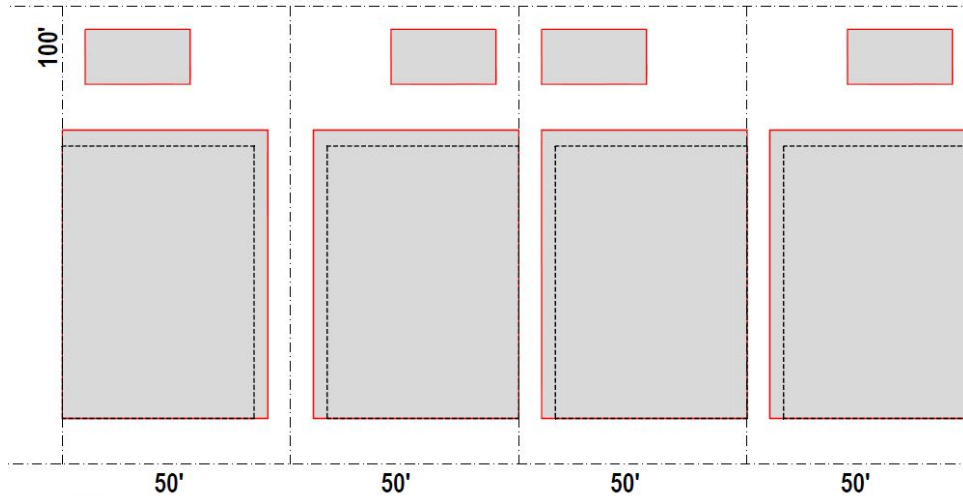
R3A with ADU

Example:

- No parking required
- Additional 500 sf. In Coverage
- Smaller side yards
- Smaller rear yard
- Essentially 3 families permitted
- This can also be permitted in basements / cellars and promotes working to legalize current non-code compliant units
- **no basement of cellar units permitted in coastal zones

This is an example of a R3A 2 family house with a ADU and no parking. Essentially 3 families could be living on such property, there would be on site parking and with the new bulk requirements the buildings are closer to the property lines and larger

City island is a coastal zone so the ADU cannot be in the basement but it can be in another building on the property, or within the house as well

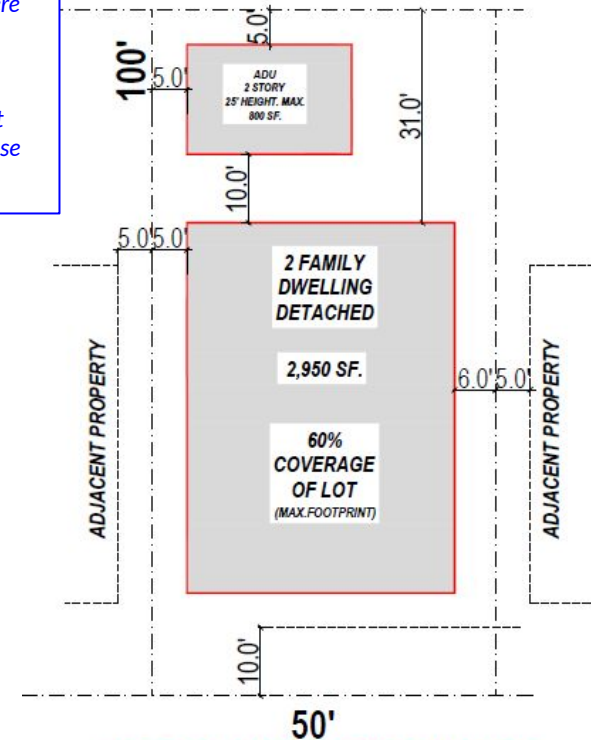


OVERLAY R3A

SCALE: NTS

City of Yes Zoning Code: 23-331 / 23-341 / 23-361

This would be an example of 4 lots adjacent to one another and how they would essentially look with max. Footprint and ADU additional unit



NO PARKING REQUIRED

CITY OF YES ZONING- SITE PLAN

ADU: 800 SF.
1ST FLOOR: 2,000 SF.
2ND FLOOR: 950 SF.

SCALE: NTS

COY CODE

Additional Changes: Residential Districts

- NO OFF SITE PARKING REQUIRED FOR NEW BUILDINGS IN RESIDENTIAL(25-21)
- New construction would no longer require parking for single / two family dwellings as well as there can be waivers for mixed use buildings

25-37

Waiver for Mixed-Use Developments

[ALLOWING FOR THE WAIVER OF NON-RESIDENTIAL PARKING REQUIREMENTS FOR MIXED-USE DEVELOPMENTS, CONSISTENT WITH PROJECT GOALS.]

R1 R2 R3 R4 R5 R6 R7 R8 R9 R10 R11 R12

In all districts, as indicated, the non-residential parking requirements of Section 25-30 shall be waived for permitted *#community facility#* and *#commercial#* *#uses#* located within *#buildings#* containing *#residences#* in accordance with this Section:

- (a) on any *#zoning lot#* within the *#Inner Transit Zone#*;
- (b) on any *#zoning lot#* with a *#lot area#* of 10,000 square feet or less that is located within the *#Outer Transit Zone#*; or
- (c) on any *#zoning lot#* with a *#lot area#* of 5,000 square feet or less that is located outside the *#Greater Transit Zone#*.

25-40

RESTRICTIONS ON OPERATION OF ACCESSORY OFF-STREET PARKING SPACES

25-41

Purpose of Spaces and Rental to Non-Residents Use of Spaces Accessory to Permitted Residential Uses

Commented [Z15]: The Proposal would also waive the non-residential parking requirements for developments with residences on small lots. This would help support mixed use developments since the ground floors could be more easily used for non-residential uses instead of parking.

MIXED USE BUILDINGS WITH RESIDENCE WOULD HAVE NO REQUIRED PARKING OUTSIDE OF GREATER TRANSIT ZONES

Commented [Z16]: The Proposal would provide a consistent of rules for how parking spaces may be used. Multi-space facilities could be made available as public parking. "Individual" parking spaces (typically associated with single- or two-family houses) would be allowed more limited rental options, consistent with rules in most districts today.

This flexibility would allow parking spaces to more efficiently be used.

25-23

Removal of Required Parking

[REPURPOSING SECTION NUMBER, ESTABLISHING NEW PROVISIONS GOVERNING REMOVAL OF EXISTING REQUIRED PARKING SPACES]

R1 R2 R3 R4 R5 R6 R7 R8 R9 R10 R11 R12

In all districts, as indicated, any required *#accessory#* off-street parking spaces serving *#dwelling units#* created between July 20, 1950 and [date of adoption] shall not be removed, except:

- (a) where serving a *#single#* or *#two-family#* *#residence#*, pursuant to Section 25-231 (Permitted removal for single- and two-family homes);
- (b) where serving other *#residences#*, as authorized by the City Planning Commission pursuant to Section 25-232 (Permitted removal of all other required parking);
- (c) where located within off-street parking facilities built prior to May 8, 2013 within the *#Manhattan Core#*, as authorized by the City Planning Commission pursuant to Section 13-443 (Reduction in the number of required existing parking spaces); or
- (d) where located within off-street parking facilities built prior to October 25, 1995 within the *#Long Island City area#*, as authorized by the City Planning Commission pursuant to Section 16-342 (Reduction in the number of required existing parking spaces).

Any amount of off-street parking spaces *#accessory#* to *#dwelling units#* in excess of the number required shall be permitted to be removed as-of-right at any time.

25-231

Permitted removal for single- and two-family homes

[REPURPOSING SECTION NUMBER, ESTABLISHING ALLOWANCE FOR SINGLE/TWO FAMILY HOMES TO REMOVE PARKING WITHOUT AN AUTHORIZATION.]

Any *#accessory#* off-street parking space serving a *#single#* or *#two-family#* *#residence#* that is required pursuant to Section 25-22 shall be permitted to be removed as-of-right at any time.

However, where driveways serving such spaces provide shared access to spaces located on adjacent *#zoning lots#*, removal of parking spaces may only be authorized by the City Planning

Commented [Z12]: The Proposal lays out the process whereby previously required parking can be removed. This would be allowed as of right for single- and two-family houses. Other previously required parking for residences would require a discretionary action. The section also makes clear that parking beyond that which was required can always be removed.

SINGLE / 2 FAMILY DWELLINGS CAN REMOVE EXISTING PARKING SPACE

Additional Changes: Residential Districts

- NO OFF SITE PARKING REQUIRED FOR NEW BUILDINGS IN RESIDENTIAL(25-21)
- New construction would no longer require parking for single / two family dwellings as well as there could be

waivers for mixed use buildings

25-37

Waiver for Mixed-Use Developments

[ALLOWING FOR THE WAIVER OF NON-RESIDENTIAL PARKING REQUIREMENTS FOR MIXED-USE DEVELOPMENTS, CONSISTENT WITH PROJECT GOALS.]

R1 R2 R3 R4 R5 R6 R7 R8 R9 R10 R11 R12

In all districts, as indicated, the non-residential parking requirements of Section 25-30 shall be waived for permitted #community facility# and #commercial# #uses# located within #buildings# containing #residences# in accordance with this Section:

- (a) on any #zoning lot# within the #Inner Transit Zone#;
- (b) on any #zoning lot# with a #lot area# of 10,000 square feet or less that is located within the #Outer Transit Zone#; or
- (c) on any #zoning lot# with a #lot area# of 5,000 square feet or less that is located outside the #Greater Transit Zone#.

25-40

RESTRICTIONS ON OPERATION OF ACCESSORY OFF-STREET PARKING SPACES

25-41

Purpose of Spaces and Rental to Non-Residents Use of Spaces Accessory to Permitted Residential Uses

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MIXED USE BUILDINGS WITH RESIDENCE WOULD HAVE NO REQUIRED PARKING OUTSIDE OF GREATER TRANSIT ZONES

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This flexibility would allow parking spaces to more efficiently be used.

25-23

Removal of Required Parking

[REPURPOSING SECTION NUMBER, ESTABLISHING ALLOWANCE FOR SINGLE/TWO FAMILY HOMES TO REMOVE PARKING WITHOUT AN AUTHORIZATION.]

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In all districts, as indicated, any required #accessory# off-street parking spaces serving #dwelling units# created between July 20, 1950 and [date of adoption] shall not be removed, except:

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- (b) where serving other #residences#, as authorized by the City Planning Commission pursuant to Section 25-232 (Permitted removal of all other required parking);
- (c) where located within off-street parking facilities built prior to May 8, 2013 within the #Manhattan Core#, as authorized by the City Planning Commission pursuant to Section 13-443 (Reduction in the number of required existing parking spaces); or
- (d) where located within off-street parking facilities built prior to October 25, 1995 within the #Long Island City area#, as authorized by the City Planning Commission pursuant to Section 16-342 (Reduction in the number of required existing parking spaces).

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25-231

Permitted removal for single- and two-family homes

[REPURPOSING SECTION NUMBER, ESTABLISHING ALLOWANCE FOR SINGLE/TWO FAMILY HOMES TO REMOVE PARKING WITHOUT AN AUTHORIZATION.]

Any #accessory# off-street parking space serving a #single#- or #two-family# #residence# that is required pursuant to Section 25-22 shall be permitted to be removed as-of-right at any time.

However, where driveways serving such spaces provide shared access to spaces located on adjacent #zoning lots#, removal of parking spaces may only be authorized by the City Planning

No parking is required so as mentioned, If you have a 2 family dwelling with a ADU unit, you essentially have 3 families living on 1 property with no off street parking

While the City of Yes concept is that ADU would be used say for a elderly family member / generation families and concluding not everyone has a car that would need to be parked- there is no stipulation on who can live in the ADU from my understanding. Also, we are not a greater transit zone so much of the community is a driving due to out location and access to transit

SINGLE / 2 FAMILY DWELLINGS CAN REMOVE EXISTING PARKING SPACE

City of Yes Districts - Residential Changes

→ the City Planning Commission, in accordance with Section 22-22 (Detached and Semi-detached Two-family Residences).

→ (a) In R1 and R2 Districts, #residential uses# shall be limited to #single-family# #detached# #residences# or any type of #residence# on a #qualifying transit-accessible site#.

MULTIPLE DWELLINGS ON
"TRANSIT ACCESS. SITES" IN R2

(b) In R3 Districts, the following limitations shall apply:

(1) in R3A Districts, #residential uses# shall be limited to #single-# or #two-family# #detached# #residences# and #single-# or #two-family# #zero lot line buildings# or any type of #residence# on a #qualifying transit-accessible site#.

MULTIPLE DWELLINGS ON
"TRANSIT ACCESS. SITES" IN R3A

(2) in R3-1 Districts, #residential uses# shall be limited to #single-# or #two-family# #residences#, #detached# or #semi-detached# or any type of #residence# on a #qualifying transit accessible site#; and

****Some areas on City Island can fall under a
"Qualifying transit-accessible Site"***

NOT SURE IF SPECIAL DISTRICT PROTECTS THIS OTHER THAN HEIGHT/BULK-NOT USE

City of Yes Districts - Residential Changes

the City Planning Commission, in accordance with Section 22-22 (Detached and Semi-detached Two-family Residences).

(a) In R1 and R2 Districts, #residential uses# shall be limited to #single-family# #detached# #residences# or any type of #residence# on a #qualifying transit-accessible site#.

MULTIPLE DWELLINGS ON
"TRANSIT ACCESS. SITES" IN R2

(b) In R3 Districts, the following limitations shall apply:

(1) in R3A Districts, #residential uses# shall be limited to #single-# or #two-family# #detached# #residences# and #single-# or #two-family# #zero lot line buildings# or any type of #residence# on a #qualifying transit-accessible site#.

MULTIPLE DWELLINGS ON
"TRANSIT ACCESS. SITES" IN R3A

(2) in R3-1 Districts, #residential uses# shall be limited to #single-# or #two-family# #residences# #detached# or #semi-detached# or any type of #residence# on a #qualifying transit-accessible site#.

Currently, 1 and 2 families are only permitted "As of right"

For example: most streets off of City Island Ave are only permitted currently for 1 and 2 families "as of right".

If multiple family dwellings are being proposed they must go to planning or some boards of sorts to be approved- a public meetings

With the City of Yes - "Any type of residence is permitted on a qualifying transit accessible site"

This is "as of right" due to the new zoning changes, no public meeting would be required resulting in the use just being permitted

This results in any areas (shown in orange on the map in this presentation) would be permitted for ANY type of residential use that permit larger bulk

Some areas on City Island can fall under a
"Qualifying transit-accessible Site"

City of Yes Districts - Residential Changes

- R2 and R3A are now include in Special Floor Area Provisions for Multi-Family Buildings
- This chapter focuses on Amenity spaces not be included in the FAR calculations to result in more space specifically for dwelling units

23-23

Type text here

Special Floor Area Provisions for Multi-family Buildings

[NEW TEXT]

R1 R2 R3 R4 R5 R6 R7 R8 R9 R10 R11 R12

In the districts indicated, the #floor area# provisions of this Section may be applied to #developments#, #enlargements#, #conversions# or alterations after [date of adoption] in all #buildings# containing three or more #dwelling units#.

23-231

Floor area provisions for amenities

[MOVING TEXT FROM SECTION 28-13 AND MODIFYING]

Floor space in a #building# allocated to #residential# amenities, including, but not limited to, recreational space, lounge, communal workspaces, package room, fitness centers, laundry facilities, wellness services or pools, pet amenities, or pools, may be exempted from the definition of #floor area#, in an amount not to exceed five percent of the #residential floor area# of the #building#. However, amenity space shall not include floor space for circulation through the #building#, including, corridors or vertical circulation spaces.

23-232

Floor area provisions for corridors

[RELOCATING FROM SECTION 28-12 AND 28-31, AND MODIFYING]

Floor space in a #building# in allocated to corridors may be exempted from #floor area# pursuant to the provisions of paragraphs (a) or (b) of this Section. Such provisions may be applied individually or in combination.

(a) Corridors Termination

The summary of sections 23-230 to 234 is that they are excluding specific spaces from the FAR calculations. What this does is- for example, if you are allowed to build 10,000sf this amount includes apartments, hallways, mechanical space, amenities etc. This provision excludes them from the calculations which then allows more sf. for residences which means bigger buildings, densely populated buildings.

Commented [Z36]: The Proposal would extend the current amenity framework for quality housing buildings to all multi-family buildings. Changes are made to better reflect contemporary residential design.

Any existing multi-fam buildings can apply these provisions

Commented [Z37]: Zoning currently allows quality housing buildings to exempt ~3 percent of their area if devoted to recreation space. The Proposal extends this to all multi-family buildings and expands the allowance to 5 percent to cover a wider range of shared amenity spaces found in contemporary residential buildings. A recreation space requirement is found in 23-60.

Amenity space in multi-fam. will not count towards the FAR- you can make more residential spaces

Commented [Z38]: The Proposal would maintain the current exemptions for corridors but update them to improve their usability. Corridors can now be terminated by apartments with more bedrooms or outdoor spaces, in addition to windows. They could also include a more varied number of units along the corridor.

City of Yes Districts - Residential Changes

→ R2 and R3A are now include in Special Floor Area Provisions for

Additional text has been added to remove things from the calculations of FAR. For example:

If you have a 5000 sf lot with a Floor area ratio of 1, you would be permitted have 5000 sf of allowable square footage to build,

In this proposal the amenity space and other service areas would not count in that calculation - meaning that you could potentially have 5000 sf. Of residential space and say 2,000 sf. Of the other service areas / amenities space permitting a 7,000 sf building that currently would not be permitted

These additional incentives would promote bigger buildings and more residential units.

In addition which I do not have full detailed understanding of currently, there is also incentives in the proposal to permit more bonuses when affordable housing is added as well so ultimately the new proposal is permitting tones of residential units to be built as well as allowing them to be smaller and different "Styles" of living as well

They would also have no requirement or very minimal for parking

23-23

Type text here

Special Floor Area Provisions for Multi-family Buildings

[NEW TEXT]

R1 R2 R3 R4 R5 R6 R7 R8 R9 R10 R11 R12

In the districts indicated, the #floor area# provisions of this Section may be applied to #developments#, #enlargements#, #conversions# or alterations after [date of adoption] in all #buildings# containing three or more #dwelling units#.

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Amenity space in multi-fam. will not count towards the FAR- you can make more residential spaces

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C1-2 & C2-2 Districts

Changes to Commercial districts

City of Yes Districts - Commercial Overlay Current

Current zoning- All C1-1 and C2-2 (*City Island Avenue*) must following the residence districts bulk requirements- meaning it has to follow the permitted sizing the same for the house.

34-111

Residential bulk regulations in C1 or C2 Districts whose bulk is governed by surrounding Residence District

LAST AMENDED 12/15/1961

HISTORY

Download

Share

C1-1 C1-2 C1-3 C1-4 C1-5 C2-1 C2-2 C2-3 C2-4 C2-5

In the districts indicated, the *bulk* regulations for the *Residence District* within which such *Commercial Districts* are mapped apply, except that when such districts are mapped within R1 or R2 Districts, the *bulk* regulations for R3-2 Districts apply.

THE HEIGHT WOULD BECAPPED AT 35'-STILL PROTECTED UNDER CITY ISLAND SPECIAL DISTRICTAS WELL ASCOVERAGE ANDSOME BULK REQUIREMENTS -SOME USES WOULD NOT BEPERMITTED BUT RESIDENTIAL REQUIREMENTS WOULD BE CHANGED

This permits all areas in orange to be able to build with the bulk requirements as per the previous residential slides. In addition this is now "AS OF RIGHT" which means no public meetings or board approval is required so such development - multi families are automatically permitted

Example:

Residence in Commercial Overlay:

Current: 5000 sf. Lot can have 3,000 sf of FAR

Proposed: 5000 sf Lot can have 5000 sf of FAR

Commercial in Commercial Overlay:

Current: no change

Mixed Total in Commercial Overlay:

Current: 5000 sf. Lot can have 5,000 sf of FAR

Proposed: 5000 sf Lot can have 7,500 sf of FAR

R3-1	0.60	1.00	1.00	1.00	1.50	25	35	35	35
------	------	------	------	------	------	----	----	----	----

Dwelling unit factor has also been removed in full and now a flat across the board 500 sf. Per unit is permitted. This means that when a multi family dwelling is built, much more units can be jammed into one footprint compared to current codes

Example:

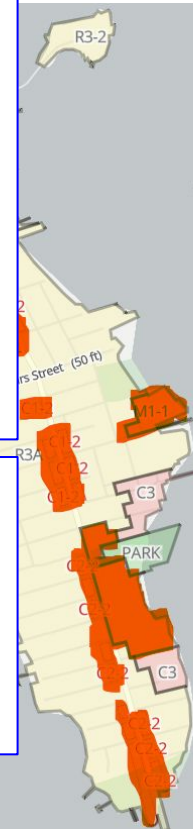
Current: 710 DU factor meaning in 5000 sf. FAR. max. 7 units would be allowed

Proposed: 500 DU factor meaning in 5000 sf. FAR. max. 10 units would be allowed

*amenity space now does not count towards FAR so more units would be permitted

R3D	2.00	2.00	2.00	2.00	2.50	45	40	35
-----	------	------	------	------	------	----	----	----

Locations A Bulk Re



HEIGHT:

While the max. Height is still 35' the base height is now permitted at 35' which means a full perimeter wall can be built to maximum height of 35'

Example:

Current:

Front wall can be built to 21-25' then must slope back or step back maxing out at 35' to highest point

Proposed:

Front wall can be built to 35' -no stepping or sloping back- maxing out at 35' to highest point Resulting in a large box

Note: Within the Greater Transit Zone, all districts are subject to the rules for R5 districts.

Potential Qualifying Transit Accessible Locations Open to Any type of Residence Types and can use R3-A Bulk Re

HEIGHT:

While the max. Height is still 35' the base height is now permitted at 35' which means a full perimeter wall can be built to maximum height of 35'

Example:

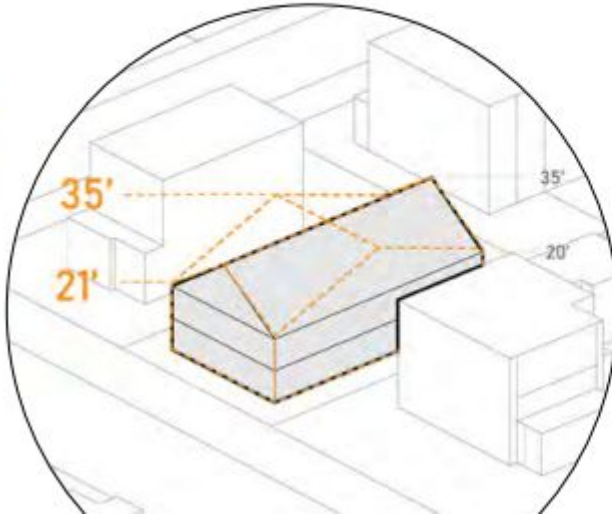
Current:

Front wall can be built to 21'-25' then must slope back or step back maxing out at 35' to highest point

Proposed:

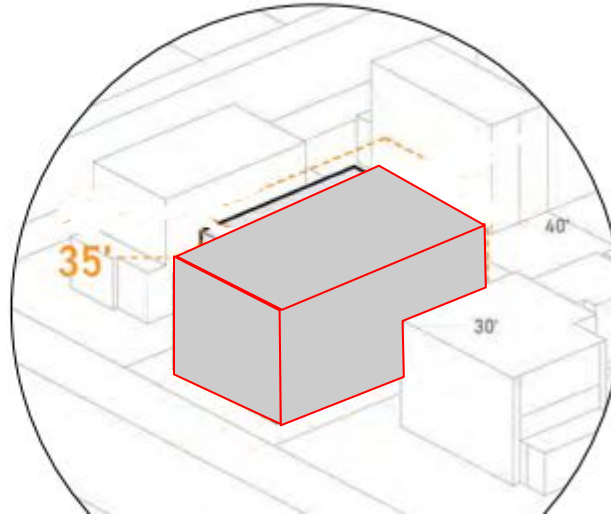
Front wall can be built to 35' -no stepping or sloping back- maxing out at 35' to highest point
Resulting in a large box

Current



CURRENT ZONING

With TOD



CITY OF YES ZONING

NEED TO KNOW WHICH SITES ARE QUALIFYING- SOME ARE
NO SURE IF SPECIAL DISTRICT WILL PROTECT THIS

Potential Qualifying Transit Accessible Locations

Open to Any type of Residence Types and can use R3-A Bulk Requirements

“Town Center Zoning”



Town Center Zoning Examples

290 City Island Avenue, Bronx



This is a three-story mixed-use building (built 1901) with a commercial ground floor and two homes above, located on City Island in the Bronx. This building exemplifies Town Center Zoning, providing a pedestrian-friendly experience and contributing to the economic vitality of the neighborhood. Due to current restrictive zoning rules, this building could not be constructed today.

SITLL MAX. 35'- SPECIAL DISTRICT PROTECTS THIS

City of Yes Districts - Commercial & M1-1 Changes

Small and Shared Housing

City of Yes for Housing Opportunity is a plan to tackle our housing shortage by making it possible to build a little more housing in every neighborhood. Together, we can make our city more affordable without dramatic changes in any one community.

An important part of this plan is re-legalizing buildings with more studios and homes with shared kitchens or other common facilities.

How it works:

NYC banned shared housing in the 1950s and apartment buildings full of studio apartments in the 1960s. This has contributed to the homelessness crisis in the decades since, and forced people who would prefer to live alone into living with roommates.

City of Yes for Housing Opportunity would re-legalize housing with shared kitchens or other common facilities. It would also allow buildings with more studios and one-bedrooms for the many New Yorkers who want to live alone but don't have that option today.

These apartments are important for so many people - recent college graduates, older households that are downsizing, and everyone who lives with roommates but would prefer to live alone. Allowing more small and shared apartments will also **open up larger, family-sized apartments** otherwise be occupied by roommates.



Constructed in 1928, the Barbizon looks like so many other classic NYC apartment buildings, but with its mix of small and shared units, it couldn't be built as configured today!



■ Eliminate dwelling unit factor
■ Reduce and simplify dwelling unit factor

City of Yes would allow for more small apartments by removing the so-called dwelling unit factor in central parts of the city and reducing it elsewhere.

Map: Where Small A

City of Yes would allow for more small apartments in multi-family districts by removing the dwelling unit factor in central parts of the city and reducing it elsewhere.

■ Eliminate dwelling unit factor
■ Reduce and simplify dwelling unit factor

As previously demonstrated- new dwelling factors would be 500 in all zones permitting much more bulk on a single lot.

Example:

*Current: 710 DU factor meaning in 5000 sf. FAR. max. 7 units would be allowed
Proposed: 500 DU factor meaning in 5000 sf. FAR. max. 10 units would be allowed*

**amenity space now does not count towards FAR so more units would be permitted*

Dwelling Unit Factor			
	Current	Proposed	Change
R1, R2, R3-1, R3A, R4-1, R4B,	--	500	--
R3-2, R4	870	500	-370
R4', R5', R5	900	500	-400
R5, R5D	760	500	-260
R5B²	1,350	500	-850
R6, R7, R8, R9, R10	680	500	-180

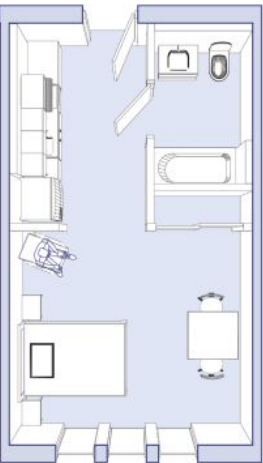


STILL NEED MORE INFORMATION ABOUT THIS IN DETAIL- BUT I DO NOT THINK SPECIAL DISTRICT WOULD PROTECT OTHER THAN BULK/HEIGHT

R3A now has the 500 DU factor which we never had before because only 1-2 families were permitted as of right - now multi families are permitted as of right in certain areas - this applies in the M1-1 areas of City island

City of Yes Districts - Commercial & M1-1 Changes

Small Housing



This proposal does not change minimum health and safety standards for a home but instead would allow more of these unit types to be built.

Shared Housing



- Shared Spaces within Units
- Shared Communal Spaces across Floor
- Private Rooms

As previously demonstrated- new dwelling factors would be 500 in all zones permitting much more bulk on a single lot.

Example:

Current: 710 DU factor meaning in 5000 sf. FAR. max. 7 units would be allowed

Proposed: 500 DU factor meaning in 5000 sf. FAR. max. 10 units would be allowed

*amenity space now does not count towards FAR so more units would be permitted

Dwelling Unit Factor		
Current	Proposed	Change
710	500	--
500	500	-370
500	500	-400
500	500	-260
500	500	-850
500	500	-180

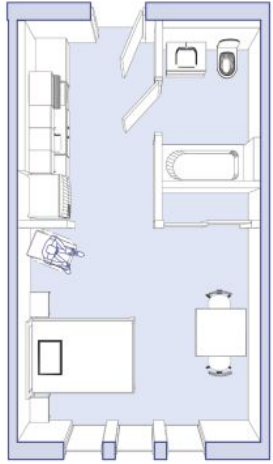


In addition, different types of housing is being proposed so that smaller units can be built (more studio apartments) as well as "SHARED HOUSING" which is more of a college dorm style living where you have a private room but communal space are shared with your unit as well as the building - aka "Single room occupancies"

R3A now has the 500 DU factor which we never had before because only 1-2 families were permitted as of right - now multi families are permitted as of right in certain areas - this applies in the M1-1 areas of City island

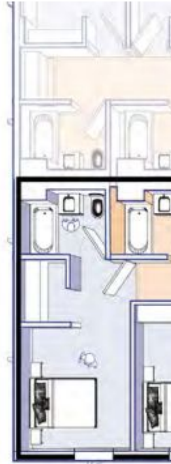
City of Yes Districts - Commercial & M1-1 Changes

Small Housing



This proposal does not change minimum health and safety standards for a home but instead would allow more of these unit types to be built.

Shared Housing



Shared Space
Private Rooms

As previously demonstrated- new dwelling factors would be 500 in all zones permitting much more bulk on a single lot.

Due to no information if the building codes themselves will be changed to reflect such zoning changes, new uses and new living types, I find this very hard to believe and think that such living styles raise huge life and safety issues that would need to be directly addressed within the building codes that they currently do not as well as the density of people and reduced living space creating additional concerns

In addition, different types of housing is being proposed units can be built (more studio apartments) as well as "SHARED HOUSING" which is more of a college dorm style living where you have a private room but communal space are shared with your unit as well as the building - aka "Single room occupancies"

before because only 1-2 families were permitted as of right - now multi families are permitted as of right in certain areas - this applies in the M1-1 areas of City island

Potential Qualifying Transit Accessible Locations
Open to Any type of Residence Types and can use R3-A Bulk Requirements

“EXAMPLE : City Of Yes- Town Center Zoning”

MAX.35'
PROTECTED



City of Yes Districts - Commercial Permitted Uses

→ Due to the Economic part of the City of Yes proposal- different uses can be permitted in addition to the as of right multi family dwellings

→ List of permitted uses- *(brief, please see code for full list and details)*

Permitted Uses:

- **Group 1**
 - Golf course
 - Public parks
- **Group 2** *(additional rules to some)*
 - Single family
 - 2 family
 - All other types of housing including
 - Apartment, hotels and affordable independent residences for seniors
- **Group 3** *(additional rules to some)*
 - College / School
 - Houses of worship
 - Ambulatory diagnostic or treatment health care facilities
 - Non-profit or voluntary hospitals and related facilities, except animal hospitals
 - Proprietary hospitals and related facilities, except animal hospitals
 - Community Centers
 - Welfare centers
 - Museums
- **Group 4** *(additional rules to some)*
 - Railroad transit rights of way
 - Energy infrastructure

Permitted Uses:

- **Group 5** *(additional rules to some)*
 - Overnight camps
- **Group 6** *(additional rules to some)*
 - Food stores
 - Department stores
 - Gas station
 - Supplier / dealers
 - Auto dealers
 - Retail stores
 - Postal
 - Telecommunication
 - Consumer goods
 - Professional services
 - Machinery rental / leasing
 - food/ drinking establishment
 - schools/ institutions
 - Personal care
- **Group 7** *(additional rules to some)*
 - Laboratories
 - Offices, business, health care
- **Group 8** *(additional rules to some)*
 - Art galleries
 - Non commercial clubs

“As of right” - No board approvals required for group 2 uses in qualifying transit areas

All with no- or very minimal parking requirements

NEED MORE INFO
HOW DOES GROUPS CHANGE
IN RELATION TO THE SPECIAL
DISTRICT REMAINING THE SAME?

M1-1 Districts

Changes to Manufacturing districts

City of Yes Districts - M1-1 Changes

→ No changes to density requirements for M1-1

NEED MORE INFO
HOW DOES GROUPS CHANGE
IN RELATION TO THE SPECIAL
DISTRICT REMAINING THE SAME?

[MAKING CLEAR NEW APPLICABILITY FOR M1-D DISTRICTS]

Use Group II consists of #residences# of various types. In #Manufacturing Districts#, #residences# shall be allowed as follows:

- (a) In M1-1D, M1-2D, M1-3D, M1-4D and M1-5D Districts, ~~by authorization of the City Planning Commission~~, in accordance with Section 42-321 (Residential uses in M1-1D through M1-5D Districts);
- (b) In M1-6D Districts, in accordance with Section 42-322 (Use regulations in M1-6D Districts);
- (c) In M1-5M and M1-6M Districts, in accordance with Section 42-323 (Use regulations in M1-5M and M1-6M Districts); and
- (d) In certain M1-1, M1-5 and M1-6 Districts, in accordance with Section 42-324 (Use regulations in certain M1-1, M1-5 and M1-6 Districts).

(b) Lower density districts

R1 R2 R3 R4 R5 C3 C4-1 C7 C8-1 **M1-1**

In the districts indicated, and in C1 and C2 Districts mapped within such #Residence Districts#, the underlying district height and setback regulations are applicable or modified as follows:

- (1) #Buildings# containing #residences#
 - (i) In R1 and R2 Districts, and in #Commercial Districts# governed by the #bulk# regulations of such #Residence Districts#, the underlying height and setback regulations shall not apply. In lieu thereof, no #building# containing #residences#, except for a #predominantly# #community facility building#, shall exceed a height of 35 feet.
 - (ii) In R3, R4 and R5 Districts, and in #Commercial Districts# governed by the #bulk# regulations of such #Residence Districts#, the underlying height and setback regulations for #buildings# containing #residences# shall apply, except for #predominantly# #community facility buildings#.
- (2) #Predominantly# #community facility buildings#

The underlying height and setback regulations shall not apply. In lieu thereof, any

Group II uses which is different residences are permitted in certain M1-1 zones

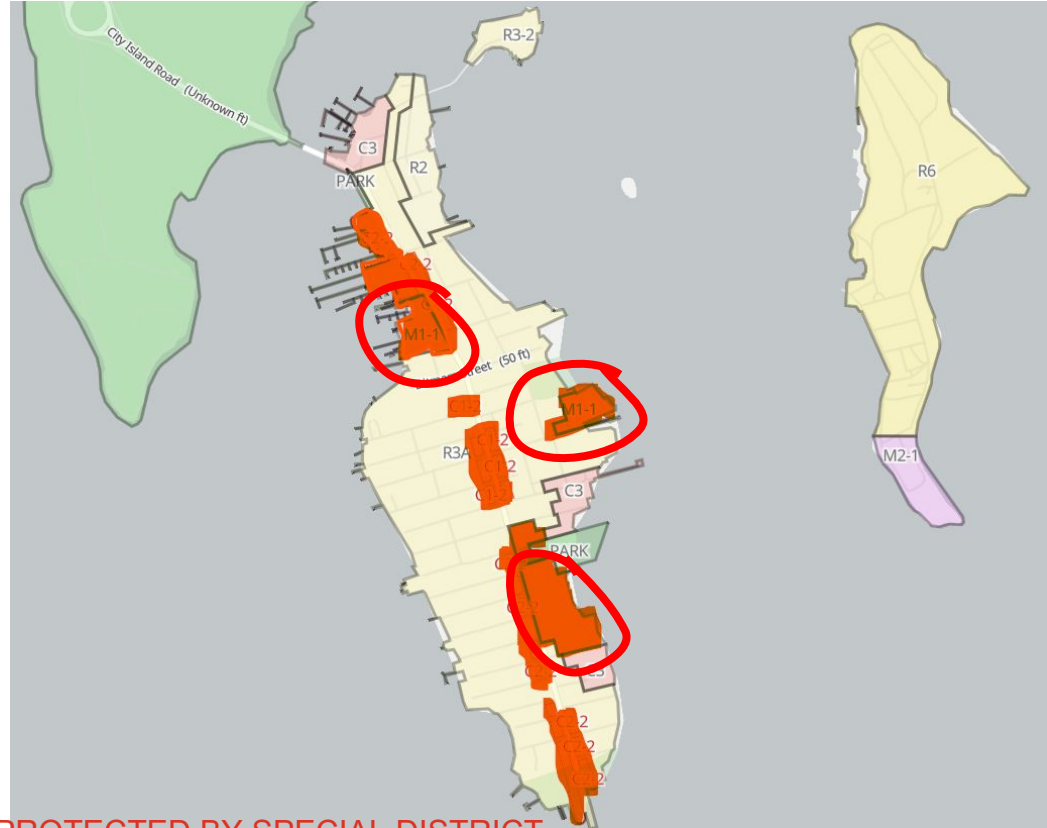
PERMITS GROUP II RESIDENCES
IN M1-1 IN ACCORDANCE W/ SECTIONS
AS NOTED

City of Yes Districts - M1-1 Changes

- All changes mentioned in the Commercial district shall apply *****
- The Circles sites need a City planning board approval for any residential development
- With the City of Yes- I am not sure if this would still be the matter. I believe this would be "As of right" so no public hearing for this type of development would be required

◆ *still looking into this for more detail

NEED MORE INFO
HOW DOES GROUPS CHANGE
IN RELATION TO THE SPECIAL
DISTRICT REMAINING THE SAME? - BULK IS STILL PROTECTED BY SPECIAL DISTRICT



City of Yes Districts - M1-1 Changes

→ Due to the Economic part of the City of Yes proposal- different uses can be permitted in addition to the as of right multi

family dwellings

→ List of permitted uses- (brief, please see code for full list and details)

NEED MORE INFO
HOW DOES GROUPS CHANGE
IN RELATION TO THE SPECIAL
DISTRICT REMAINING THE SAME? -
BULK IS STILL PROTECTED BY SPECIAL DISTRICT

Permitted Uses:

- **Group 1**
 - Golf course
 - Outdoor racket courts
 - Outdoor skating rinks
 - Public parks
- **Group 2 (additional rules to some)**
 - Single family
 - 2 family
 - All other types of housing including
 - Apartment, hotels and affordable independent residences for seniors
- **Group 3 (additional rules to some)**
 - Houses of worship
 - Ambulatory diagnostic or treatment health care facilities
 - Non-profit or voluntary hospitals and related facilities, except animal hospitals
 - Proprietary hospitals and related facilities, except animal hospitals
 - Community Centers
 - Museums
- **Group 4 (additional rules to some)**
 - Court houses
 - Fire / police station
 - Prisons
 - Utility (additional rules)
 - Waste/ disposal (additional rules)
 - Boat launching
 - Docks
 - Freight terminals
 - Mooring facilities
 - Railroad transit rights of way

Permitted Uses:

- **Group 5 (additional rules to some)**
 - Campes
 - Motels
 - Tourist cabins
 - Transient hotels
- **Group 6 (additional rules to some)**
 - Food stores
 - Department stores
 - Gas station
 - Supplier / dealers
 - Auto dealers
 - Retail stores
 - Postal
 - Telecommunication
 - Consumer goods
 - Professional services
 - Machinery rental / leasing
 - food/ drinking establishment
 - schools/ institutions
 - Personal care
- **Group 7 (additional rules to some)**
 - Laboratories
 - Offices, business, health care
- **Group 8 (additional rules to some)**
 - Amusement facilities / parks
 - Art music dancing studio
 - Arenas
 - Stadiums
 - Assembly spaces

Permitted Uses:

- **Group 9 (additional rules to some)**
 - Material yards
 - Micro distribution
 - Moving / storage facilities
 - Warehouses
 - wholesale
 - Boat storage
- **Group 10 (additional rules to some)**
 - Animal good manufacturing
 - Slaughtering / processing
 - Tobacco manufacturing
 - Textile production
 - Different material manufacturing

"As of right" - No board approvals required for group 2 uses in qualifying transit areas

*[*still looking into this for more detail about public hearing](#)*

All with no- or very minimal parking requirements

Potential Qualifying Transit Accessible Locations

Open to Any type of Residence Types and can use R3-A Bulk Requirements



"EXAMPLE : City Of Yes- M1-1 District"



Example:

*This is currently approx. 55,000 sf.
Lot*

A multi family dwelling can be placed with a max height of 35' (base), no parking requirements, amenity space incentives, and lower DU factor resulting in:

3-4 story 60-80 unit apartment building with no parking & potentially no planning board approval required or public hearing

**still looking into this for more detail about public hearing*

**depending on yard sizing, coverage etc. this is an estimate*

NEED MORE INFO
- BULK IS STILL PROTECTED BY SPECIAL DISTRICT

Conclusion

Our city is a balance between a built environment and natural environment. Years and years of established zoning codes, building codes and enforcement agencies have been set in place and curated to shape our cities, towns and communities under regulation. These rules and processes have been set in place to protect the safety, welfare and health of all people. While it would be safe to say the 1960s codes may need some revisiting in regards to use groups and "modern" upgrades- a "one size fits all" blanket zoning does not suit a city like NYC. All of the boroughs have their own unique characteristics whether it's the people, the transportation, the physical environment or just how the community functions together.

Manhattan is the heart of what makes up NYC, providing its densely populated areas, mixed uses and living up to its long lived title of the "City that never sleeps". While many people might like this lifestyle of living, some communities want to sleep. Living on City Island in the Bronx my whole life - it is an easy statement to make stating that Manhattan and City Island are 2 different worlds. City Island is predominantly a residential community with less than 5,000 people who live a much more relaxed, suburban way of life compared to the other boroughs. While the boating industry is not the same as it was many years ago- it can still be said that our community is one of the very few places left in NYC which holds a quaint nautical suburban character, trying to maintain its title as "The Seaport of the Bronx". With these zoning changes, the City is opening the doors for this to be destroyed. City Island as well as other special districts need an abundance of special district zoning rules to prevent over-development that our infrastructure, land and public resources cannot physically sustain- such dense areas are not meant to be in these locales.

The proposed zoning changes would destroy what our community has worked so hard to sustain, as well as NYC! In 2003, the City Island area was rezoned to reduce development and preserve our character. As per the adopted 2003 codes, a 23 block area was rezoned from R3-2 to R3A to help maintain and protect the existing character of the area. 5 Blocks of commercial overlays were removed to assist in conforming back to the existing development patterns on the blocks. M1-1 Zones were changed to R3A zones to keep with the times as sailing making uses are not as common anymore and changed to residential R3A zones to adapt with the predominant existing residential use. The "City Island Special District" zone has been curated to protect our unique area. The zoning codes and use groups that may work in highly densely populated areas like Manhattan or Brooklyn may work, but not in our special district.

While I can agree with the use of group changes to adapt to modern times, from a personal and professional standpoint I do not agree or support the zoning changes for all of NYC, not just City Island. The blurred lines of permitted zoning types, increase in permitted bulk as well as housing type changes is not something that would work in our NYC society. Our current housing crisis and vacant store issues are not because of zoning. The "City of Yes" Economic proposal is promoting to provide more commercial spaces, affordable housing / different housing types as well as permit large home operated businesses but all of these proposals are a complete contradiction of what is currently going on. The "City of Yes" Housing proposal is promoting no parking, more permitted dwelling units on one lot, bigger buildings and new sharing housing types which unfortunately would only work in a utopia- which NYC is not.

City of Yes is looking to provide more commercial spaces but at the same time stating the abundance of vacant storefronts. Commercial spaces are not vacant because of zoning, they are vacant because of inflation and a new world of remote working. Providing more commercial space incentives and areas where they can operate will do nothing but result in more empty storefronts. The City of yes is pushing more affordable housing and opening the permitted use of communal living spaces, more single room occupancies as well as accessory tenant spaces but many of our current affordable housing buildings and multi family buildings are in despair and unsafe for residents. Our building department takes weeks and months for approvals and is understaffed as well as inadequately trained to ensure that these spaces meet the proper life and safety standards needed for these sort of mixed use residential types. These same issues would apply to promoting large home based businesses as more people with different uses in a specific area call for additional life and safety requirements, how would NYC ensure that all these mixed uses are adequate? This is also another contradiction within itself as we want to open more storefronts but then want to promote more home business, there is no clear path as to what this plan would achieve. In addition they are proposing to permit "moderately" sized apartment building in low density areas. These areas are low density for a reason and cannot support density. Deteriorated or no infrastructure exists in such areas and introduction additional housing would result in more issues.

The housing crisis and vacant stores are NOT related to zoning codes, they are a direct result of poor decisions made by our politicians and the current economic climate of our state and country. Our taxes are high, our infrastructure is poor, our municipality departments are understaffed and underfunded, our subways and streets are dangerous, there is nothing about NYC that says we need to promote development- we need to promote REVITALIZATION. These new zoning codes are painting a picture of "harmony" but yet they are jeopardizing the health, welfare and safety of communities as well as detrimental to our already deteriorating infrastructure.

When considering zoning codes, City/ Community planning, all aspects of environment, utility, infrastructure, traffic, community, etc. have to be carefully analyzed to make proper decisions as well as understanding that each area of a City (especially NYC) requires different things. The NYC zoning code is long overdue for some updates, but each borough as well as some neighborhoods need their own additional districts and rules to account for their unique characters. While many areas already do have this, the special districts in place do not protect such areas from the new changes and density that would be permitted. These new blanket code changes would completely destroy homeownership, single family homes, low- medium density communities, infrastructure, character and businesses, as well as jeopardize many life safety, welfare and health concerns/ codes.

SAY NO TO "CITY OF YES" -Alyssa Manfredonia R.A

As a housing organizer and now Outreach Coordinator at Housing Preservation and Development (HPD) here are some the simple questions folks ask me daily in all 5 boroughs:

Does our city need more housing?

Who is building it ? Who is it for ?

What are developers building?

When will it be finalized?

Where will they build ?

Why are they building it ?

HOW will they build ?

The 'City of Opportunity' because the 'City of Yes' plan for us without us is Community is a NO. Residents are the experts; they know what's up and they don't like it.

I am here to support my work by holding those residents to light, here to share an honest transparent testimony with serious criticism.

City of Preservation

City of Opportunity

City of Sustainability

What on Earth happened to The Land ?

Flooding, Fires, Flushing, Fresh Water Supply

We are experiencing a population surge that places greater demands on our homes and land. As density increases, I'm deeply concerned about sewage, waste, flooding, and the loss of natural light in our homes. I often look up at the sky on my way home from work and ask myself, "Do the people making decisions about our city care about us and the sunshine we need?" This surge will drain and contaminate our freshwater supply if we don't pause this massive plan to build up. It's neither fair nor right to those of us who value our natural resources. Our already overburdened sewage system will become a source of pollution, threatening the health and safety of all New Yorkers.

What matters most to me is housing for ALL New Yorkers. We must prioritize quality, safety, and inclusivity—not just profit. Development should not encroach on green spaces or add unnecessary density. We need housing that is free of toxins like lead paint, mold, and allergens that exacerbate asthma, especially in areas like The Bronx.

We deserve transit that works for every district we need to move around.

Our local officials recognize the wonderful diversity of our city. To thrive, we need new laws, better infrastructure, and real investment in our communities. The "City of Yes" plan

promotes transit-oriented development by encouraging housing near subway and bus lines, especially in boroughs like Brooklyn (e.g., East Flatbush) and Queens (e.g., Jamaica). It aims to reduce car dependence and make commuting easier for residents. However, only a small percentage would benefit from new transit, leaving out many high-density neighborhoods.

In transit-poor areas like parts of the Bronx or Staten Island, where public transportation is less reliable, new developments could further strain an already stressed system. The mayor's plan does not cover most of the overburdened district- it lacks details on how infrastructure will scale with new housing, risking strain on an overburdened transit system. We must pause this proposal and engage in comprehensive, district-specific planning. New York is not one-size-fits-all. Before proceeding, the city must first: expand subway/bus service in underserved areas (e.g., South Bronx, Eastern Queens), upgrade infrastructure to avoid overcrowding near new developments, increase bike lanes and pedestrian-friendly streets citywide, prioritize transit access in rezoning plans to reduce car dependency, improve accessibility for disabled residents across all transit systems, and allocate funds for transit in low-income neighborhoods (e.g., Brownsville, Staten Island).

The plan should ensure infrastructure upgrades (roads, schools, transit) to support denser housing and provide clear guidelines on how and where new developments will be integrated into communities.

“Are those the numbers?”

If this plan is truly meant to solve high rents, skyrocketing property taxes, and the housing shortage, why does the Mandatory Inclusionary Housing Program keep producing homes that most New Yorkers can't afford? Why aren't there any modest apartments for myself and my friends who work modest jobs already? The plan aims to address NYC's "missing middle" (moderate-density housing) by rezoning to allow more duplexes, triplexes, and small apartment buildings, particularly in outer boroughs like Queens and The Bronx. Neighborhoods such as Astoria or Bay Ridge could see more mixed-use developments. We know this always ends up as an upzoning by increasing density.

It risks gentrification, displacing long-time residents in areas like East New York, and may burden infrastructure without sufficient investment in HDFCs and Mitchell-Lama co-ops in areas like Central Harlem and Hamilton Heights. Low-density neighborhoods like those in Staten Island will still be left out, limiting the plan's reach in less developed areas. We keep having this long, drawn-out, misleading conversation on how numbers work. They don't work for us. Homeowners, too, are being forced into crises. How can we inspire new homeownership when homeowners are being pressured to provide housing through accessory dwelling, for a problem they didn't create? People don't belong in garages or basements—they belong in safe, affordable homes. The "City of Yes" plan could hurt homeowners by increasing housing density in traditionally low-density areas, potentially lowering property values and changing neighborhood character. It may also lead to higher taxes as infrastructure expands to support new developments. Forcing long time home owners out of their neighborhoods. Homeowners do not

want to be surrounded by commercial and tall buildings - preservation is key and folks need money to do it.

Digging Deeper - Housing Laws & Infrastructure

We are facing an urgent, clear problem: outdated laws and sluggish infrastructure. NYC has fallen behind. We've swept this crisis under the rug for far too long. Since the 1960s, we've barely produced enough housing to keep up with our growing population. Our leaders have neglected the needs of the people who shape our housing landscape today. Growing up, I knew this city was built by the community, not developers seeking commercial profit. Without the state programs to provide tax abatements or big government aid programs why would we believe 'City of Yes' would provide anything other than upscale housing, similar to that produced by zone change in Brooklyn neighborhoods, Harlem, Long Island City and at this rate all of NYC. The market system is unable to produce affordable housing on its own, period. Safe, modest housing was built for some of the strongest New Yorkers I know.

It's time to stop feeling powerless, unsafe, and uninspired. Mayor Eric Adams' plan promises affordable housing for all, but we need more than promises. Strict and outdated zoning laws hinder new construction, worsening the shortage of housing supply- ultimately stunting growth and sustainability, challenges for small property owners - too many confusing regulations forcing high costs discouraging landlords from maintaining or improving properties. We need a revised plan that reflects the unique needs of each district. The time for change is NOW. Here are a list of demands for the 'City of Yes Plan'

1. Increased Affordable Housing: Ensure a significant portion of new developments are truly affordable for low and middle-income residents.
2. Revise Zoning: Permit more mixed-use and mid-density developments, especially in outer boroughs like Queens and the Bronx.
3. Stronger Tenant Protections: Safeguard against displacement due to gentrification.
4. Expand Homeownership Opportunities: Include programs for first-time homebuyers, especially in historically underdeveloped neighborhoods.
5. Infrastructure Investment: Ensure new housing projects are paired with investments in schools, transit, and healthcare
6. Support for Small Landlords: Simplify confusing regulations and provide incentives for maintaining affordable rental units.

Investment, Morale, Community Trust

What is this plan really building? This is the largest housing initiative in the nation, but it risks allowing developers to destabilize the very heart of our city. We, the residents, will pay the price if this happens without transparency and care. Where is the money going? Our buildings and homes are literally falling apart due to a lack of infrastructure, accountability, and urgency. If we don't get this right, it will be too late. We must act now. I urge the city to revise this plan with input from community residents and district leaders.

Department of Buildings (D.O.B)

Pierina Sanchez's Billingsley Terrace Structural Integrity Bill provides a clear example of how agencies can work quickly and efficiently to address preservation and sustainability. Safety assurance through structural inspections from the Department of Buildings (D.O.B.) in residential buildings can improve the quality of life for many residents. I'm tired of seeing thousands of dollars wasted on constant renovations, replacements, and cheap illegal "patchwork" caused by owner negligence and lack of funding. The city needs to focus on maintaining safe buildings. I am hopeful this bill will build community trust by prioritizing residents' safety.

We need a plan that reflects our real needs—an equitable plan. I say NO to this rushed and dangerous development scheme.

Housing Preservation & Development (H.P.D)

Residents are still grappling with the aftermath of the pandemic, and yet HPD (Housing Preservation and Development) is under-resourced, overburdened, and understaffed. The bureaucratic red tape makes it nearly impossible for HPD to effectively address our housing crisis. Buildings are crumbling, collapsing, burning- harming those most at risk. We need new laws and real investment in the agencies responsible for our housing infrastructure. The system is failing, and it's our communities that suffer. Without the state programs to provide tax abatements or big government aid programs why would we believe 'City of Yes' would provide anything other than upscale housing, similar to that produced by zone change in Brooklyn neighborhoods, Harlem, Long Island City and at this rate all of NYC. The market system is unable to produce affordable housing on its own, period.

It's time to let Robert Moses rest-create a new legacy, City Planning. The current plan is worse than the urban planning disasters of the past. Block by block, district by district, we are sacrificing our city's future if we don't demand change to the plan. We are a city built by the people, not by developers and corporate greed.

If community boards say no, districts say no we know how it goes- revise the plan.

The answer is NO.

From: [Amanda Walsh](#)
To: [Land Use Testimony](#)
Subject: [EXTERNAL] City of Yes Plan
Date: Wednesday, October 23, 2024 9:34:06 AM

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To Whom it May Concern:

The City of Yes plan, a 1 glove fits all agenda, is a poor fit for our community. This proposal will put additional burden on already overwhelmed infrastructure in flood prone areas. Place stress on already overcrowded and many underperforming schools. In most situations increased population and density will jeopardize public safety. Our police force, fire department, EMS, health and human services cannot withstand additional work loads. This aggressive plan will remove parking mandates for new development projects. Our car-centric, low density R 1 - R 5 neighborhoods are already parking deprived. A housing crisis is the alleged reason for this over reaching plan. However, allowance of tens of thousands of new entrants to our city while there is a crisis is akin to strategically placing additional holes in a sinking ship. New York City cannot maintain their sidewalks Over 9,000 sidewalks damaged by tree roots await repair. The repair wait list exceeds 5 years. New York City please fix what you have before adding more. Go back to the drawing board and do a district by district assessment. Determine which fingers properly fit the gloves and bring a modified product back to the respective council members and their constituents for approval. Force feeding creates a gag reflex. This plan in its current state is not digestible for many New Yorkers. Thank you in advance for your anticipated cooperation.

Amanda Walsh


Sent from my iPhone

October 22, 2024

Testimony on City of Yes for Housing Opportunity to New York City Council Land Use Subcommittee on Zoning and Franchises Public Hearing

I am Jim Wright, an architect speaking on behalf of the American Institute of Architects New York (AIANY) in support of City of Yes for Housing Opportunity (COY-HO). Statistics are clear that NYC is facing an acute shortage of housing supply and lack of affordability impacts us all. Each neighborhood has a shared responsibility to contribute to real solutions to this crisis.

Several aspects of the proposal will allow an incremental and proportional increase in housing supply in what is called the 'missing middle'. These include-

- the designation of mixed-use Town Center Zoning which would allow 3-5 story mixed-use buildings along existing commercial corridors in low- to middle-density neighborhoods;
- the expansion of Transit Zones city-wide which would allow for modest growth in low- to middle-density R1 through R5 zone districts near transit stations; and
- the removal of current zoning requirements that mandate a minimum number of off-street parking spaces in most new residential buildings.

Together, these provisions will remove some barriers that limit even modest housing production in lower density neighborhoods, particularly outside of Manhattan, returning to traditional neighborhood development patterns that preserve the character and scale of those neighborhoods.

Transit-Oriented Development and Town Center Zoning

The expansion of Transit Zones city-wide to specific qualifying sites within ½ mile of transit stations is a wholly appropriate application of transit-oriented development which links land use with access to public transportation and more job opportunities. The overlap of Transit Zones with Town Center Zones creates opportunities to increase mixed-use housing options with access to public transit that strengthen our neighborhoods.

Elimination of Minimum Residential Parking Mandates

The elimination of minimum off-street parking requirements in new residential buildings can lower the total cost of constructing those units by as much as 12% to 25% - with a direct impact on affordability. And on certain small or irregular sites constricted by parking requirements, this can make it possible to utilize the full allowable as-of-right FAR capacity at that site. This is about providing housing options based on local neighborhood conditions, not requirements which too often favor parking over housing affordability.

AIANY Support for COY-HO

This zoning provides the necessary planning framework which, along with other tools like economic incentives, affordability programs, and community investments in physical and social infrastructure, can help create over 100,000 new units with greater affordability to support sustainable growth across all of our neighborhoods.



American Planning Association
New York Metro Chapter

Creating Great Communities for All

Housing Opportunity Through Zoning Reform

Submitted by the Housing and Neighborhood Revitalization Committee of the
Metro Chapter, American Planning Association

Thank you for the opportunity to submit comments on the proposed “City of Yes for Housing Opportunity (COYHO)” zoning text amendments on behalf of the American Planning Association New York Metropolitan Chapter (APA-NYM.)

Introduction

The American Planning Association (APA) exists to elevate and unite a diverse planning profession as it helps communities, their leaders and residents anticipate and navigate change. In 2024, APA’s sole policy priority is advocating for support for zoning reform as it is key to increasing much needed housing supply, a crisis that continues to accelerate nationwide. Our colleagues throughout the country are advocating for locally led zoning reform to break down regulatory barriers that stand in the way of producing more housing. Consistent with this national policy, APA-NYM, supports many of the proposed zoning text changes included in the COYHO that enable accessory dwelling units, removal of mandated parking requirements, transit-oriented development, enhanced town centers, and small and shared housing. We commend the primary goal of having all neighborhoods contribute to increasing NYC’s housing supply.

Addressing New York City’s Housing Crisis

We concur with the DCP’s conclusion that New York City needs to facilitate the development of a substantial amount of new housing. The Adams administration has a goal of adding 500,000 additional units within 10 years. We do not know how this number was derived or if it is the correct number of new dwellings needed but we agree that the current vacancy rate of less than 1.4 percent for rental housing in general and less than 1% for housing renting at amounts 30% or less of area median income, is harmful to the city’s well-being and to its residents. This shortage of housing raises housing prices for New Yorkers at all income ranges and deters mobility – keeping too many residents in apartments



that no longer accommodate their needs while carrying an unreasonable rent burden and leaving far too many residents with no housing at all.

With the City's housing goals in mind the COYHO proposes to create conditions for the addition of about 110,000 units. The environmental review documents indicate that the new units would be added by 2039 or an average of about 7,300 per year. In effect, production of 110,000 units sounds like it would provide better than 20 percent of the decade-long goal when it would be more likely to produce less than 15 percent of that goal. Considering that housing production in New York City has not reached or exceeded 500,000 in any decade since the 1920s, the COYHO notwithstanding, there is still no pathway laid out to reach the 500,000-unit target.

We appreciate that, unlike previous administrations, this proposal seeks to encourage housing production throughout the city. Zoning reform is a critical step in removing barriers to needed housing production. However, the development of needed affordable housing requires added measures such as increased funding, technical assistance and education. We have advocated for the creation of the Federal HUD managed Pro Housing Fund to support similar planning efforts and are pleased to see that the NYC Department of Housing Preservation and Development (HPD) received close to \$4 million from the recent round of funding to support neighborhood planning, City Environmental Quality Review (CEQR) reforms, public education and engagement to facilitate the development of affordable housing. We urge the administration to increase capital funding for the development of affordable housing and adequately staff the HPD to manage funds and projects. The passage and implementation of J-51 tax abatements, long used to support preservation of affordable housing, is one quick step forward.

We raise several concerns for the Commission to consider in evaluating public comments and revisions to the COYHO.

Universal Affordability Preference

The proposal would eliminate both the original R10 Inclusionary Housing Program and the later Inclusionary Housing Designated Area (IHDA) Program while adding a new Universal Affordability Preference (UAP). We heartily support replacing the



R10 program which was designed in an era when other housing subsidies were not available in the high-value R10 districts and, consequently, the affordable housing it produces, while needed, account for less than less than five percent of a project's dwellings.

One benefit of the UAP is that it is universal and will not require the lengthy time and effort required to individually rezone areas to make Inclusionary Housing programs applicable. It is less clear how effective the UAP would be in areas that are now designated as IHDA's. In an R6 district within an IHDA today, for example, the base FAR is 2.7 within 100 feet of a wide street and 2.2 on other lots for developments that choose not to provide affordable units. If the development includes the IHDA affordable units, the permitted residential FAR goes up to 3.6 and 2.42 respectively. Under the COYHO, the base FAR within 100 feet of a wide street increases to 3.0 from 2.7. If affordable housing were provided pursuant to the UAP, the maximum residential FAR in R6 is increased to 3.9 provided that the additional FAR is devoted to affordable housing. It is unclear if this is workable.

Would property owners on wide streets currently within IHDA's just take the increase to 3.0 FAR and forego the available 3.9 FAR? That additional FAR is unlikely to be profitable. It seems the program would be reliant on incentives under the State's 485-X program. For many if not most developments in an R6 district, the project would contain less than 99 units so a developer would have to provide 20 percent of the units as affordable which for a 3.0 FAR building would account for 0.6 FAR of affordable housing and 2.4 FAR of market-rate housing. For a developer taking advantage of the UAP-available FAR of 3.9, 0.9 FAR of the 3.9 FAR – 23 percent - would have to be affordable. It is incumbent upon the City to show that the UAP will work in this example (as well as others). If it doesn't work, developers who would have chosen the IHDA example may now just build 3.0 FAR without any affordable housing (or 3.0 with only 0.6 FAR of affordable housing).

Rear Yards

Since 1961, both the Multiple Dwelling Law and the Zoning Resolution have generally required 30-foot rear yards for residential development. Where opposing rear yards back up on each other, the resulting space is designed to be a minimum of 60 feet deep. It is not by accident that this is the same depth as the



width of a typical narrow street in New York City. In this way, units in the front and back of dwellings are entitled to a similar degree of light and air. The COYHO proposes to change the minimum depth of a residential rear yard to 20 feet up to a height of 70 feet.

We understand that this is a necessity when creating rear accessory dwellings in low-density neighborhoods. Fortunately, residential buildings in these neighborhoods have rarely exceeded 35 feet in height so, generally, there are not tall structures that would diminish access to light and air in the proposed reduced-depth rear yards and there are recent prototypes in certain Brooklyn low-density neighborhoods where reduced-depth rear yards have been permitted by special permit.

In middle- and high-density neighborhoods, these smaller rear yards and rear yard equivalents would be bordered by tall structures, meaning that the rear units of these buildings – and the rear units of buildings on the parallel street the face these reduced-rear yards – would now have a significantly bleaker environment outside their windows. It is unclear why this is thought to be needed. In a typical 100-foot-deep lot in a middle and high-density district, the front of the building is at or near the street line and, when providing a 30-foot-deep rear yard, 70 feet is available for the depth of the apartment building. Most apartment buildings are built with a depth of 60-65 feet. While there may be instances where a shallower-than-30-foot-rear yard might be needed, it hardly seems necessary to obliterate the rear yard protections for all middle- and high-density residents.

Commercial to residential conversions

We support the expansion of the conversion of commercial to residential buildings to a city-wide applicability as well as inclusion of shared housing as an eligible housing type. We do question the lack of affordability requirements. The several completed commercial to residential conversions in Manhattan's financial district produced expensive high-end units. We understand the potentially high costs of conversion will prohibit affordable units without substantial assistance. The new Affordable Housing Commercial Conversion Tax Incentive Benefits (AHCC) passed in this year's State budget, will require projects to make 25% of their units affordable at an average of 80% AMI to receive a 35-year property tax exemption ranging from 65 to 90% and decreasing by 10% for the last five years.



It is unclear how attractive developers will find this program. Again, consideration should be given to exploring other funding, incentive and tax abatement programs to encourage the production of affordable units in these conversions.

Accessory Dwelling Units

The allowance of accessory dwelling units is a strategy employed across the nation to increase housing supply in lower density areas such as in California, Connecticut and Oregon. We support this with the concern recognizing that the development of ADUs will be challenging, particularly for low and moderate income homeowners. We applaud the recent announcement of a \$4 million allocation to create an ADU pilot program of up to 20 owners as well as other tools to facilitate these projects. Reaching the proposed goal of 40,000 new ADU's will clearly require more financial assistance.

Campus Infill Proposal

The campus infill proposal includes the expansion to 50% of lot coverage for development which is considerably more lot coverage than most existing campuses. This proposal should include requirements for mitigation of loss of public space and recreational areas, community participation procedures in the planning and review process and inclusion of affordable housing requirements. This is particularly important for NYCHA campuses, where residents have endured long standing deferred maintenance due to reductions in Federal funding.

Lower-Density Neighborhoods

We commend the DCP for developing a proposal that asks all areas of the city to contribute to addressing the city's housing shortage. However, it does not do so evenly. Shortly after the first Zoning Resolution was adopted in 1916 it was modified to recognize the difference between single- and two-family neighborhoods. For more than a century – indeed since the consolidation in 1898, one of the city's strengths has been that it incorporated some of its suburbs within the city limits. Clearly, if the burdens, such as they are, of accommodating more housing is to be spread out, lower-density districts should not be



exempted. It also seems likely, however, that the lower-density areas of the city would be subject to more change than the middle or higher-density districts. Adding 0.3 FAR to the maximum allowed along a wide street in an R 6 district would add about 8 percent more floor area and perhaps one additional story to areas where apartment houses are already common.

Permitting 2.5 FAR, five-story buildings in an R3-2, district (with an 0.6 FAR) in Laurelton with single-family homes is a potentially far more neighborhood character altering than anything proposed for the middle and high-density districts. That is why so many of the speakers in opposition to COYHO were from residents of low-density communities. We encourage the City Planning Commission to re-examine its approach to these communities with a more sympathetic eye. Perhaps a more modest building could accommodate a similar amount of development at less than 5 stories at 2.5 FAR. Perhaps, merely fronting a wide street in a lower-density community is not as important as the creation of real town centers in these communities' commercial cores, with greater transit options and possibly higher FAR.

Conclusion

APA-NYM appreciates the ambitious effort made by DEP and CPC in the COYHO, the most comprehensive zoning text amendment since 1961. The over 1,200 pages of varied changes require considerable review to understand the impacts on current zoning created over the years including: special districts and many text elements addressing housing quality, neighborhood services and infrastructure requirements, however they will generate much needed housing. We advocate for continued public education and support to implement these reforms.

However, increased affordable housing requires more than zoning reform. New York State recently took the supportive actions of lifting the residential FAR cap and approving the tax abatements: 485-X and the AHCC. We urge NYC to use these tools and to continue to seek additional resources to support development of affordable housing to meet the needs of all New Yorkers.

We thank you for this great contribution to advancing New York City's housing supply and the opportunity to comment on this important proposal.

[EXTERNAL] City of yes housing no to city of yes

amgarry (null) <>

Wed 10/23/2024 10:08 AM

To: Land Use Testimony <landusetestimony@council.nyc.gov>;

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Save our individual zoning by community!!!!
Sent from my iPhone



22 October 2024

Amie Gross AIA

**Written Testimony to New York City Council
Subcommittee on Zoning and Franchises**

Amie Gross Architects has designed affordable housing for over three decades and holds the belief that City of Yes addresses in several ways the devices needed to assist in creating housing supply. It could also do more to address the housing affordability crisis to help enable those of low and middle incomes to stay in New York City.

One of its main attributes is the creation of an economy of scale. City of Yes will help to build more on the same lot area, causing costs per square foot to decrease. By slightly increasing FAR and other changes in bulk, more units can be built on the same size lot.

Based on an analysis by our firm of eight projects in our office in varied boroughs, the City of Yes could create a structure up to 15% larger than what could have been constructed previously. Using RS Means that the reference point for cost estimating, about a 6% reduction in costs can happen as a building gets larger and that the percentage of savings will increase as the scale of a project increases. Simply put, City of Yes allows for an economy in scale which could result in lower rents assuming landlords do not take that construction savings solely to increase profits.

As Architects, we respect the fact that to create housing, many NYC agencies are involved. Each have their own rules and timelines. We suggest that a task force with the power to create policy be created to develop a streamlined process, requiring input from each agency early on in the design process, so that when a project is filed with DOB, major issues are worked out. We applaud the rubrics DOB developed to speed up its processes. These processes could be built upon to create an expanded model of coordination among all agencies.

As noted, AGA believes that The City of Yes is an initiative that New York City very much needs and that it should be passed. Yet, we do note that ensuring affordability requires further investigation. As others have said, this legislation should provide permanently affordable housing opportunities for all new Yorkers. Current estimates note that City of Yes will provide between 58,000 – 109,000 new units on top of what would be built over a 15-year period. Those are impressive numbers, yet only 9,200- 22,000 are estimated to be affordable, which is approximately 20% of that amount. We suggest that data be analyzed of recently rezoned areas which currently have much construction activity to show the impact on rents when there is a significant increase in the number of apartments created.

As a lifelong New Yorker, I thank you for your deep commitment to our City. We offer the expertise of our firm in any way to assist you in this critical endeavor.

Thank you.

[EXTERNAL] No to City Of Yes

Amore DiLisio <

Mon 10/28/2024 12:26 AM

To: Land Use Testimony <landusetestimony@council.nyc.gov>;

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Dear Planning and Land Use Committee for the New York City Council,

Please vote no to the City of Yes Housing Policy. I do not feel that the policy overall will benefit New Yorkers.

Thank you,
Amore DiLisio

<https://www.amoredilisio.com/>
<https://m.facebook.com/amoredilisio>

From: [Andon Keller](#)
To: [Land Use Testimony](#)
Subject: [EXTERNAL] City of Yes | End parking minimums
Date: Tuesday, October 29, 2024 4:36:32 PM

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I am an 11+ year resident of NYC. I am writing in support of eliminating parking minimums from our zoning codes.

Parking minimums make housing more expensive. They are burdensome, outdated, and contribute to our housing crisis. Other cities like Buffalo, Austin, and San Jose have successfully removed parking minimums.

Parking mandates impede affordable housing development, increase construction costs and rents, and disproportionately burden low-income households with costs.

Building new housing along transit lines reduces emissions, improves access to jobs, boosts neighborhood well-being, and makes commuting easier.

74% of New York City voters support lifting parking mandates – with just 17% opposed — according to recent Open New York poll.

[EXTERNAL] Support for City of Yes for Housing Opportunity

André Magnani | [REDACTED] >

Wed 10/23/2024 11:26 AM

Inbox

To: Land Use Testimony <landusetestimony@council.nyc.gov>;

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Hi, my name is Andre Magnani - I write to you as a fortunate person who has been able to become a first-time homeowner at the age of 39 of a 100-year old two bedroom in Brooklyn that probably couldn't be built today given downzoning, landmarking, and all the other obstacles New York has put on housing.

To qualify for this co-op unit, I had to amass more than 400 thousand dollars in assets... partly because co-ops can be so picky in such a supply-limited environment.

My story is unlikely and uncommon. It's about an immigrant kid who came from a small island off the coast of Brazil, who was fortunate enough to get an excellent public education, go to graduate school, and through a lot of luck and hard work, today probably makes more money than his whole family back home. You shouldn't have to be this lucky to be able to live and stay in NYC.

Today, I have a 3-year-old NYC-born daughter, and it's on her behalf that I hope you'll vote for the City of Yes. I hope that in 20 years when she's looking to strike out on her own to start her studies, career, and family... she doesn't have to be as freakishly lucky as I was. I hope she can follow a job she loves and have a vibrant, affordable, and diverse city around her.

I hope rising costs don't constantly displace her and her future community and, with your help, can fulfill their dreams right here. Please vote for the City of Yes and all future housing supply initiatives.

André Livramento Magnani | [REDACTED]

[EXTERNAL] City of Yes does not address housing for extremely low income communities

Andrea Mungo <

Wed 10/23/2024 2:45 PM

To: Land Use Testimony <landusetestimony@council.nyc.gov>;

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Dear NYC Council,

My name is Andrea Mungo and I am a resident of Astoria, Queens. I am a Social Worker and work for my church. In my career I have worked with clients who are struggling to find affordable housing. Often, going into the shelter system is the only way to eventually receive a housing voucher. And then finding a landlord that is willing to take a housing voucher is a huge feat. I am also involved in housing justice with my volunteer work with the Western Queens Community Land Trust.

The City of Yes plan does not go far enough with guaranteeing deeply affordable housing for the working poor and extremely low income communities of our city. NYC is a city of immigrants and therefore we should be a city that looks out for the poor and marginalized and doesn't forget those in need.

Massive rezonings and the subsequent increase in housing supply do not actually help our affordability crisis. And our current "inclusionary housing" does not truly address the need for affordable housing. Yes, it brings more luxury towers (that are not built very well) but a very small number of truly affordable units.

In an op ed piece in the City Limits by Angotti, Dubnau and Salazar, they write "Real estate developers won't build housing priced at levels affordable to unhoused New Yorkers, single parents, the unemployed and even your average working class family without significant subsidies. It is not profitable enough to do so." More than half of New Yorkers are rent burdened, paying more than 30 percent of their income on rent and in some cases they pay almost double that amount. We saw in LIC the housing supply go up

but the prices also went up and the population got whiter.

The City of Yes plan should add planning tools to slow land speculation, subsidize housing outside of the profit-making system and consider requiring developers to pay NYC a percentage (50% for example) of the value increase of the land on whatever they build. This would deter the more greedy speculators from developing buildings because they're not reaching the profit potential they want. This "tax" could be used by the City to subsidize affordable housing as well as create more green space/parks and waterfront walkways.

I ask that you consider revising the current City of Yes plan to address the City's need for truly affordable housing.

Sincerely,
Andrea U. Mungo



[EXTERNAL] I support lifting Parking Mandates and City of Yes: Housing Opportunity

Andres Salomon <>

Fri 10/25/2024 3:42 PM

Inbox

To: Land Use Testimony <landusetestimony@council.nyc.gov>;

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Hi,

Parking minimums/mandates are stupid and unscientific, even in the most rural of places. They're especially stupid in one of the most dense and transit-rich places in the United States. And in the midst of a climate crisis when we should be trying everything we can to lower VMT and switch people from cars to other forms of transportation, they're unbelievably, monumentally stupid.

Abolish all parking requirements from NYC zoning.

Thanks,
Andres Salomon (Forest Hills, Queens)

From: [Andrew Flippo](#)
To: [Land Use Testimony](#)
Subject: [EXTERNAL] City of Yes; Lifting of Parking Requirements; Paladino
Date: Tuesday, October 22, 2024 7:07:01 PM

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Hello —

My name is Andrew Flippo. I have lived in Chelsea since 2018, when I first moved to NYC (perhaps Congresswoman Paladino would think my opinion doesn't matter, being a "newbie" to NYC).

I support City of Yes.

I support lifting parking requirements.

I support real efforts to make housing affordable for all New Yorkers and the myriad people around the country and world who dream of making our fine city their home.

I reject Councilwoman Paladino's devotion to cars and congestion, as well as her divisive nativism. Her rude and small-minded rhetoric does not represent the spirit of the greatest and most capable city in the history of humanity. Shame on her and all the fear mongers who want to hold us back.

Please advance City of Yes and lift parking restrictions.

With warm regards,

Andrew Flippo



From: [Andrew G](#)
To: [Land Use Testimony](#)
Subject: [EXTERNAL] Support for the city of yes
Date: Tuesday, October 29, 2024 11:04:15 AM

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Hello,

My name is Andrew, I've lived in Queens for 5 years and NYC for 13 after growing up in New Rochelle. I fully support the city of yes, in fact I think we could go even further in allowing up zoning citywide.

Please pass this law, we desperately need more housing. As I've said, I've been in NYC/ the region my whole life, my family has been here since the 1880s and because of housing costs many have started to move away to other parts of the country. I want to stay and continue to build a family here, but we need more affordable 2-3 bedrooms for families. Please allow more supply to be built, remove parking requirements and allow the construction of larger units that families need by allowing them to go up to 5-6 stories by right.

Thank you, I hope you all can help me and families like mine. I once again issue my full endorsement of the plan and encourage you all to be more aggressive and make NYC the capital of the world through aggressive building like it once was.

Thanks,
Andrew

From: [Andruw Magnus](#)
To: [Land Use Testimony](#)
Subject: [EXTERNAL] City of Yes Housing Opportunity - SUPPORT
Date: Friday, October 25, 2024 9:10:55 AM

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Good morning,

I'm writing to voice my strong support of the City of Yes for Housing Opportunity, with a hope that Council will approve the zoning text changes with as few changes as possible.

As a New Yorker, state employee, and community board member, I've witnessed firsthand the devastating impact of our twin affordability and vacancy crises. My grandparents lived comfortably in the city their entire lives, but rising costs and caregiving burdens forced my parents to leave. Now, even with a decent job, strong social network, and roommates, I struggle to stay. Unless the city is ready to build public or social housing, the best case is to amend the zoning regulations to make it easier to build more housing, and more types of housing.

I implore you, this is a once-in-a-generation opportunity to impart climate and economic justice, and transform the city for the better. I believe all parts of the proposal are essential: from the removal of parking minimums to the reorganization of subsections to make chapters easier to follow. Please support the City of Yes for Housing Opportunity for all.

Kindly,

Andrew

Adrienne E. Adams, Speaker
New York City Council
City Hall
New York, NY 10007

October 24, 2024

Re: Testimony in Opposition to City of Yes for Housing Opportunity

Dear Speaker Adams and City Council Members,

I strongly urge you to vote no on Mayor Adams' City of Yes Housing proposals which are neither equitable nor reasonable for the future of our city and its communities.

This "one size fits all" plan is an undemocratic and counterproductive scheme designed by developers for developers, and being promoted by a mayor who is currently indicted for bribery, fraud, and accepting foreign campaign funds. These proposals prioritize the interests of big real estate, reward and incentivize corruption, while undermining the well-being of New Yorkers and the future of our beloved neighborhoods and city.

Despite the misleading promises of "affordable housing" and "opportunity zones," the reality is that the City of Yes prioritizes density over true affordability. This plan is not about creating homes for working-class New Yorkers; it is about creating profits for developers, builders, and speculators. Rather than addressing the housing crisis, the plan will lead to overdevelopment, displacement, and gentrification, replacing owner-occupied housing with market-rate and luxury rental units. This ensures that long-term residents will be pushed out of their own communities while large developers capitalize on unchecked growth.

City of Yes also fails to address the pressing concerns of our overburdened infrastructure. The proposal would promote dense development without providing the necessary upgrades to aging systems like drainage, sewers, and electrical grids. The loss of scarce green spaces would further exacerbate environmental risks, including increased flooding, while compromising the quality of life for residents. In a time when we need to harden our city against the climate crisis, City of Yes would only worsen these vulnerabilities. NYC cannot afford to succumb to absurd magical thinking & gaslighting that pretends removing parking mandates, legalizing death traps & putting grandma in the garage is going to improve conditions.

It's important to note that nothing currently prevents the construction of affordable housing under existing rules. In my own neighborhood of Rego Park, new rental buildings with affordable units have recently been built and more are currently under construction. Meanwhile, there are some properties that remain underutilized and/or vacant due to flawed tenant laws that deter both landlords from renting & potential buyers from purchasing tenant occupied properties. This shows that the City of Yes is not the solution to affordability, but rather a cover & accelerant for reckless development.

Furthermore, according to official statistics, New York City has lost about 800,000 residents in recent years, returning to roughly the same population size as in 1960. However, we now have 800,000 more residential units than we did then. In fact, 150,000 new units were approved in the first half of 2024 alone. Current zoning actually accommodates 16 to 20 million more people without any need for drastic changes. These numbers, along with the evidence I see & hear with my own eyes & ears, prove that current zoning is not the problem. The claim that sweeping zoning changes are necessary for affordability is not supported by the data, nor my lived experience.

Worst of all, passing this pay-to-play scheme would eliminate the relevance of City Council, diminish local input, and undermine the will of the people. City of Yes threatens to further erode public trust in government and create more resentment and unrest, as it silences the very communities it claims to help.

For the sake of our city, our neighborhoods, and our democracy, I respectfully implore you to please **VOTE NO** on this deeply flawed proposal.

Thank you for your attention and consideration in this vital matter.

Sincerely,

A handwritten signature in black ink, appearing to read 'Angela Aminova', written in a cursive style.

ANGELA
AMINOVA

■■■■ ■■■■ ■■■■
Rego Park, NY 11374

Supporting Material/Sources:

- New 3 story rental building (67-47 Alderton St. in Rego Park) on my block, has 18 residences. It's available on NYC Housing Connect, contains 6 units for residents at 130 percent of the area median income (AMI), ranging in eligible income from \$68,572 to \$139,620. Demographics of occupants appear to be a diversity of young working-class people. However, in addition to unsightly & unsanitary conditions (pictured below), which have not been addressed –despite numerous complaints to the 311 and the Sanitation Dept, many occupants of this building, as well as many Rego Park residents in general, have dogs. Yet, there is no dog park within walking distance.

<https://newyorkyimby.com/2022/01/housing-lottery-launches-for-67-47-alderton-street-in-rego-park-queens.html>



- 8 story affordable housing building currently under construction at 68-19 Woodhaven Blvd. & 68th Rd. in Rego Park, Queens and have replaced Florist Hills & Power Auto Body (convenient, local small businesses).

<https://newyorkyimby.com/2020/11/eight-story-affordable-housing-development-revealed-for-68-19-woodhaven-boulevard-in-rego-park-queens.html#>

- KSK Construction & Mayor Eric Adams

<https://nypost.com/2023/11/11/metro/construction-biz-in-adams-fbi-probe-has-shoddy-safety-record/>

From: [REDACTED]
To: [Land Use Testimony](#)
Cc: [REDACTED]
Subject: [EXTERNAL] No to the City of Yes
Date: Wednesday, October 16, 2024 5:18:26 PM

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I am Angela Castellano, Co-President of the Lost Community Civic Association
We do not want the City of Yes proposal.

[Sent from the all new AOL app for iOS](#)

[EXTERNAL] Comments / Opposition to City of Yes

Angela Mirro



Wed 10/23/2024 3:20 PM

To: Land Use Testimony <landusetestimony@council.nyc.gov>;

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As a New Yorker who resides in Brooklyn, I am very aware and agree that there needs to be more affordable and low income housing throughout all NYC boroughs; however the approach that the City of Yes is proposing, advocating for eliminating zoning restrictions to allow for more building development totally negates the responsibility of landlords and commercial real estate interests to lower rents and increase affordability. The issue should be more about affordability and less about more development. disrupting neighborhoods, destroying community gardens and open green spaces, blocking sunlight with more and more high rise buildings. Northern Brooklyn is experiencing an onslaught of high rise building construction, blocking the sky and sunlight for everyone, most of it for the luxury market, why is this okay?

The absence of open space and sunlight diminishes the quality of life for all New Yorkers.

There needs to be a better balance, our Mayor, City Council, City Planning, land use committee and Housing Authority need to see these disparities and invest more resources in existing buildings sitting empty, holding greedy landlords and large building owners accountable for price gauging, and not advocating for the profit driven developers.

Sincerely,

Angela Mirro
Brooklyn Resident

[EXTERNAL] City of Yes Zoning for Housing Opportunity

Gus Goldsack <



Wed 10/23/2024 2:35 PM

To: Land Use Testimony <landusetestimony@council.nyc.gov>;

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Hi,

I am writing to express support for all zoning reform proposals under City of Yes. In particular, I support the abolishment of parking mandates, as many other cities across the country with much higher car ownership than NYC have already achieved. Most New Yorkers do not drive a car and both our buildings and streetscapes should reflect this.

Angus Goldsack



--

Gus Goldsack



From: [Patrick Rocchio](#)
To: [Land Use Testimony](#)
Subject: [EXTERNAL] City of Yes Housing
Date: Friday, October 25, 2024 8:58:37 AM

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Testimony:

No to City of Yes. Preserve City Island's Special District Zoning.

Anh Rocchio

City Island Resident

[EXTERNAL] Opposing the City of YES proposal

andy vazquez jr <

Fri 10/25/2024 1:46 PM

To: Land Use Testimony <landusetestimony@council.nyc.gov>;

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To Whom it May Concern:

The City of Yes plan, a 1 glove fits all agenda, is a poor fit for our community. This proposal will put additional burden on already overwhelmed infrastructure in flood prone areas. Place stress on already overcrowded and many underperforming schools. In most situations increased population and density will jeopardize public safety. Our police force, fire department, EMS, health and human services cannot withstand additional work loads. This aggressive plan will remove parking mandates for new development projects. Our car-centric, low density R 1 - R 5 neighborhoods are already parking deprived. A housing crisis is the alleged reason for this over reaching plan. However, allowance of tens of thousands of new entrants to our city while there is a crisis is akin to strategically placing additional holes in a sinking ship. New York City cannot maintain their sidewalks Over 9,000 sidewalks damaged by tree roots await repair. The repair wait list exceeds 5 years. New York City please fix what you have before adding more. Go back to the drawing board and do a district by district assessment. Determine which fingers properly fit the gloves and bring a modified product back to the respective council members and their constituents for approval. Force feeding creates a gag reflex. This plan in its current state is not digestible for many New Yorkers. Thank you in advance for your anticipated cooperation.

Anibal Vazquez, Jr



Bronx, New York 10465


From: [Ann Kelly](#)
To: [Land Use Testimony](#)
Subject: [EXTERNAL] Re: Oppose The CITY of YES
Date: Wednesday, October 23, 2024 7:55:57 AM

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The City of Yes plan, a 1 glove fits all agenda, is a poor fit for our community. This proposal will put additional burden on already overwhelmed infrastructure in flood prone areas. Place stress on already overcrowded and many underperforming schools. In most situations increased population and density will jeopardize public safety. Our police force, fire department, EMS, health and human services cannot withstand additional work loads. This aggressive plan will remove parking mandates for new development projects. Our car-centric, low density R 1 - R 5 neighborhoods are already parking deprived. A housing crisis is the alleged reason for this over reaching plan. However, allowance of tens of thousands of new entrants to our city while there is a crisis is akin to strategically placing additional holes in a sinking ship. New York City cannot maintain their sidewalks Over 9,000 sidewalks damaged by tree roots await repair. The repair wait list exceeds 5 years. New York City please fix what you have before adding more. Go back to the drawing board and do a district by district assessment. Determine which fingers properly fit the gloves and bring a modified product back to the respective council members and their constituents for approval. Force feeding creates a gag reflex. This plan in

its current state is not digestible for many New Yorkers.
Thank you in advance for your anticipated cooperation.

Regards,
Ann Kelly


Bronx, NY 10465

From: [Ann Marie Sinisi](#)
To: [Land Use Testimony](#)
Subject: [EXTERNAL] Vote No
Date: Wednesday, October 23, 2024 8:37:00 AM

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I am a Howard Beach homeowner and am sending this e mail to encourage you to vote no!
Ann Marie Sinisi

Sent from my iPhone

[EXTERNAL] Follow up on mandatory parking minimums

Anna Cheng <[REDACTED]>

Wed 10/23/2024 11:06 AM

To: Land Use Testimony <landusetestimony@council.nyc.gov>;

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Hello,

I wanted to share my testimony about how important housing affordability is to young adults. I am in my 20s and I think that parking requirements impede housing affordability. I am an educated voter who hopes to be able to rent or even purchase a home here, and contribute to my community and the economic vibrancy of the city for years to come.

I agree with the following points:

- The existing proposal does not affect any existing parking, nor does it ban or restrict the construction of parking. It simply allows business owners and families to decide what amount is right for them.
- Adding a parking space to a new construction costs an average of \$67,000. In the case of underground parking garages, the number can be as high as \$150,000
- These costs are passed on to the buyers and renters of new properties. This is especially obscene when the new property in question is meant to serve low-income families who are unlikely to even own a vehicle.
- The housing market is a city-wide market. Costly regulation in one area has a detrimental effect on affordability everywhere.
- Even if someone is in the market for a home with a parking spot, parking-free apartments help make that more affordable by anchoring the market at a lower price.
- The proposal is ultimately about free choice. If someone believes that parking is worth the cost, they will always have that option. Why should someone who does not want this feature, or simply does not own a vehicle, be forced to pay exorbitant amounts?
- Many cities have removed parking requirements in recent years, these include Nashville, Minneapolis, and Buffalo. None saw drastic reductions in parking construction. All saw a noticeable increase in housing construction and business creation.
- A lot of smaller lots in older neighborhoods cannot accommodate the existing regulations. As a result, they simply remain vacant while the cost of housing soars.
- People whose buildings offer free or low-cost parking are significantly more likely to purchase a vehicle in the first place. Does anyone really think we need more congestion on the roads?

Thank you,
Anna Cheng
Living in Hamilton Heights/10031

From: [Anna A Yiu](#)
To: [Land Use Testimony](#)
Subject: [EXTERNAL] City of Yes
Date: Wednesday, October 23, 2024 3:54:00 PM

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Hi,

I am a member of BFHA which represents over 1,500 homes and writing to express my deepest concern with the City of Yes proposal. We do not have the infrastructure to support this 500% increase in overdevelopment and it will absolutely be catastrophic to our quality of life and ruin our beautiful neighborhood. NYC has the same population today as it did in 1960. This proposal will be reversing our lifetime of hard work to protect and benefit our community.

Kind Regards,
Anna Lee

Sent from my iPhone

Sent from my iPhone

From: [Anna Leistikow](#)
To: [Land Use Testimony](#)
Subject: [EXTERNAL] City of Yes for Housing Opportunity
Date: Monday, November 11, 2024 9:28:32 AM

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Hi,
Thanks for your civic leadership on the Council.

I'm a Manhattan resident and am writing you today to ask for your support, in voting to lift or end parking minimums / mandates.

Like the vast majority of folks in the 5 Boroughs,
I don't own a car.

- **Parking mandates impede affordable housing development**, increase construction costs and rents, and disproportionately burden low-income households with costs.
- **Building new housing along transit lines reduces emissions**, improves access to jobs, boosts neighborhood well-being, and makes commuting easier.
- **The proposal is popular:** 74% of New York City voters support lifting parking mandates – with just 17% opposed — according to a new poll from Open New York.

Thank you for your support,
Anna

Sent from [Proton Mail](#) for iOS

From: [Annette anna](#)
To: [Land Use Testimony](#)
Subject: [EXTERNAL] No to C of Y
Date: Thursday, October 17, 2024 7:21:27 AM

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Good Day,

I have lived in NYC my entire life,

Born in Manhattan and raised in LIC, Astoria and living in Flushing since 1970.

I love Flushing and it breaks my heart when I see another majestic tree cut down to make a wider driveway and an historic architectural gorgeous home torn down to build a cheap unsightly multi family home.

City of Yes will further destroy and take away our diminishing quality of life in this small remaining oasis of Queens.

Removing green space, trees, packing people into unsafe places and overcrowding an already crowded area, not to mention the dangers involved with doing this.

I vote and plead NO to the C of Y!

Sincerely,

Anna Lupoli



Flushing, NY 11357

Sent from my iPhone

[EXTERNAL] City of Yes

Anna Pizzelli <

Fri 10/25/2024 8:15 AM

To: Land Use Testimony <landusetestimony@council.nyc.gov>;

 1 attachments (10 MB)

Written Testimony by Joel A. Siegel, Esq., in Opposition to City of Yes.pdf;

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Good morning,
Today is the last day to submit written testimony to your committee.

I live in Ditmas Park, Brooklyn.

I join my neighbor Joel Siegel's very clearly expressed written opposition, which I enclose.

Sincerely,

Anna Pizzelli


Brooklyn NY 11226

From: [Anne Beach](#)
To: [Land Use Testimony](#)
Subject: [EXTERNAL]
Date: Wednesday, October 23, 2024 7:23:13 AM

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— To Whom it May Concern: The City of Yes plan, a 1 glove fits all agenda, is a poor fit for our community. This proposal will put additional burden on already overwhelmed infrastructure in flood prone areas. Place stress on already overcrowded and many underperforming schools. In most situations increased population and density will jeopardize public safety. Our police force, fire department, EMS, health and human services cannot withstand additional work loads. This aggressive plan will remove parking mandates for new development projects. Our car- centric, low density R 1 - R 5 neighborhoods are already parking deprived. A housing crisis is the alleged reason for this over reaching plan. However, allowance of tens of thousands of new entrants to our city while there is a crisis is akin to strategically placing additional holes in a sinking ship. New York City cannot maintain their sidewalks Over 9,000 sidewalks damaged by tree roots await repair. The repair wait list exceeds 5 years. New York City please fix what you have before adding more. Go back to the drawing board and do a district by district assessment. Determine which fingers properly fit the gloves and bring a modified product back to the respective council members and their constituents for approval. Force feeding creates a gag reflex. This plan in its current state is not digestible for many New Yorkers. Thank you in advance for your anticipated cooperation.

Anne Beach



Whitestone, NY 11357

From: [Anne Klein](#)
To: [Land Use Testimony](#)
Subject: [EXTERNAL] CITY OF YES
Date: Friday, October 25, 2024 6:31:04 AM

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As a concerned registered voter of Eastern Queens County, I implore you to stand up to the one size fits all rezoning that is the City of Yes. I chose to stay in NYC rather than move to Nassau County because my area of Queens afforded me the best of both worlds. If you destroy my neighborhood and what's right outside of it with multi buildings and do not listen to most of your constituents in my area, that is the antithesis of what a government official is supposed to do. Any Council member has to see that the strength of NYC is the beauty of its diversity. There is no such thing as one size fits all. I urge you and your members to vote NO on the city of yes.

Anne Klein

[EXTERNAL] City of Yes



Fri 10/25/2024 3:42 PM

To: Land Use Testimony <landusetestimony@council.nyc.gov>;

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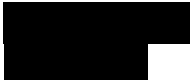
I am opposed to the City of Yes proposal because it will drastically change neighborhoods in the outer boroughs. We already suffer from a lack of transportation options in Northeast Queens, so this area is dependent upon cars for transportation. Increasing the housing density without regards to the parking requirements would be a disaster.

Other city services, including water and sewage, the electric grid, and educational services would be adversely affected by the increased population.

The City of Yes proposal does not address affordability of this increased housing, so it will not solve the problem of those who are unhoused because of affordability.

I think the current City of Yes proposal should be rejected and we should go back to the drawing board to create more housing without destroying the uniqueness of various neighborhoods in this great Mosaic of a city.

Regards,
Anne O'Connell



Sent from my iPhone

[EXTERNAL] Parking minimums

Anny Chen <>

Wed 10/23/2024 12:50 PM

To: Land Use Testimony <landusetestimony@council.nyc.gov>;

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Do away with parking minimums and provide more affordable housing. That disrespectful lady representing college point can sit down since she doesn't represent me.

-signed a constituent living in Brooklyn 11207, born in Manhattan at st. Vincent's hospital 🙄

[EXTERNAL] Lifting Parking Requirements

Anthony Patti <

Wed 10/23/2024 11:41 AM

To: Land Use Testimony <landusetestimony@council.nyc.gov>;

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Hi All,

I support lifting parking requirements.

Sincerely,

Anthony Patti

From: [Anthony](#)
To: [Land Use Testimony](#)
Subject: [EXTERNAL] Oppose city of yes
Date: Wednesday, October 23, 2024 7:11:47 AM

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To Whom it May Concern:

The City of Yes plan, a 1 glove fits all agenda, is a poor fit for our community. This proposal will put additional burden on already overwhelmed infrastructure in flood prone areas. Place stress on already overcrowded and many underperforming schools. In most situations increased population and density will jeopardize public safety. Our police force, fire department, EMS, health and human services cannot withstand additional work loads. This aggressive plan will remove parking mandates for new development projects. Our car-centric, low density R 1 - R 5 neighborhoods are already parking deprived. A housing crisis is the alleged reason for this over reaching plan. However, allowance of tens of thousands of new entrants to our city while there is a crisis is akin to strategically placing additional holes in a sinking ship. New York City cannot maintain their sidewalks Over 9,000 sidewalks damaged by tree roots await repair. The repair wait list exceeds 5 years. New York City please fix what you have before adding more. Go back to the drawing board and do a district by district assessment. Determine which fingers properly fit the gloves and bring a modified product back to the respective council members and their constituents for approval. Force feeding creates a gag reflex. This plan in its current state is not digestible for many New Yorkers. Thank you in advance for your anticipated cooperation.

Anthony Pressimone



Bx.ny 10465

Sent from my iPhone



Anti-Displacement NYC is a housing collective and group of organizers and educators that promotes decommodified housing solutions and fights against displacement and gentrification in New York City. We are unequivocally opposed to the City of Yes. This yimbified monstrosity of hundreds of pages of zoning changes does little to address the actual housing crisis going on for the working class. The real housing crisis is the lack of affordable housing for working class new yorkers, vacancy rates for NYC apartments under \$1100 at .39%¹, ten of thousands of rent stabilized apartments being warehoused, the privatization of NYCHA. City of Yes does nothing to address this housing crisis. Almost every proposal in the City of Yes is a wishlist from developers and yimbys. The City of yes continues a decades long failed housing strategy that relies solely on private developers to build housing. We have known for a long time that real estate capitalism will never build housing suitable for the working class. New York City and New York State have spent decades wasting resources on market driven, developer designed housing policy. Enough is enough.

Under the guise of zoning being outdated, Mayor Adams and his cronies have created a grab bag of giveaways and incentives for developers. The City of Yes simply gives more power and money to developers/real estate while trying to cut the already minimal means of community engagement in the land use process. The “affordable” housing option is just tacked on to City of Yes as only 20% of a development thus actually making it less units then the failed MIH (Mandatory inclusion housing) program. The affordability levels set at an average of 60% deceptively allows developers for each project to decide what AMI options they will take, allowing them to select half of the apartments at 90% AMI which is market rate rents or way above for many neighborhoods. When 83% of rent burdened renters need apartments at AMI levels lower than 50 % to not be rent burdened², it's obvious that the affordability options for COY do nothing for working class renters. In fact it is so obvious that even supporters of COY at public hearings have said that “it will not address the affordability issue and we will deal with that later”. This is totally nonsensical logic to not address the actual housing crisis and expend resources and time on a false solution like COY. .

The city council cannot fix COY with slight modifications or additions. The entire premise of COY is wrong and a false solution. Zoning is not an issue, zoning is merely an excuse being used by developers and their lobbyists to distract people from properly addressing the root causes of the housing crisis. Housing is not a commodity or investment asset. Housing is an essential human right. City Council needs to affirm these facts and vote No on the City of Yes.

¹ <https://gothamist.com/news/want-an-nyc-apartment-under-2400-good-luck-with-that>

² <https://anhd.org/report/data-brief-we-have-least-housing-where-renters-need-it-most>

Anti-displacement NYC

From: [Antonio Alvarez](#)
To: [Land Use Testimony](#)
Subject: [EXTERNAL] City of Yes is a Critical first step for New York City
Date: Wednesday, October 23, 2024 9:40:16 AM

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Hi,

My name is Antonio Alvarez and I am a long term resident of Bed Stuy. I'm writing to express my strong conviction that the City of Yes proposal needs to be passed in its entirety.

As the council well knows, New York City is in the depths of a critical housing crisis. However, this crisis is not just any crisis it is specifically a housing shortage. There are simply not enough homes for the economic and job growth that the city has seen over the past 2 decades.

This is in many ways a good thing. It means NYC is still as vibrant and dynamic as it always has been. But this is a city that will always attract more and more people. and those people need homes to live in. As is evidenced by the crisis we find ourselves in, making it more difficult to build in the city will NOT stop people from moving here. It will only cause rents to skyrocket and force existing low income New Yorkers to compete with higher income workers for the same apartments.

We desperately need the provisions of the City of Yes to pass to alleviate SOME of the crisis. Let me be clear, this isn't enough. We also need to improve our transit network, education system and trash management. But these criticisms that opponents of the bill bring up do not mean that City of Yes for Housing is wrong or not a critical first step. Yes, those things need to be addressed but that is NOT a reason to block this bill.

That includes lifting the requirement for parking on new build. NYC is one of the few places in America where you have the liberty to live car free. That has always been a cornerstone of the city's culture and economy. Of course there are instances where driving is necessary but as the City grows and transitions to a net zero and green future we MUST build high density housing with no parking. Many Many places in the city would love to build but the parking mandate makes it prohibitive. Why should the government tell builders they must build parking when nobody is asking for it??

Please pass this legislation INCLUDING an elimination of the parking mandate.

Best,
Antonio



October 25, 2024

**Testimony at the Hearing of the City Council Subcommittee on Zoning and Franchises
regarding City of Yes for Housing Opportunity**

Dear Chair Riley and Committee Members:

My name is Robert Horsford, and I am the President and Chairman of Apex Building Group, an MBE-certified real estate developer and general contractor established in Harlem. With a focus primarily on affordable housing, Apex partners with non-profit organizations and public entities such as NYC HPD and NYCHA to create, or rehabilitate, thousands of affordable units to date.

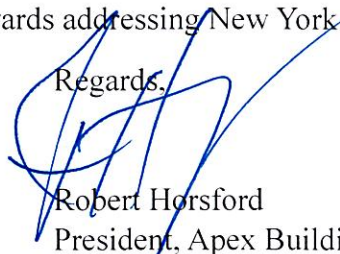
Apex is submitting testimony in support of the *City of Yes for Housing Opportunity* text amendment, as we believe this is a policy that will place an abundance of desperately-needed affordable housing units into service for the people of New York. In particular we are in strong support of the following provisions:

- **The Universal Affordability Preference.** Providing a 20% floor area bonus for fully affordable housing developments would greatly improve the generation of housing on scarce city land. It would be especially beneficial to our partnerships with non-profit housing providers, who require 100% affordability as a basic requirement of their mission.
- **Simplifying the commercial-to-residential conversion process.** This will allow us to expand housing opportunities in parts of the city that are near educational and economic hubs.
- **Eliminate costly parking minimums and release space and financing towards apartment unit construction instead.** While parking would still be a market necessity for projects in transit deserts, flexibility to account for and accommodate local context is key to designing residential projects that maximize housing opportunity, while remaining to responsive to unique community needs.

While we support this proposal, we also believe programmatic enhancements can be made by the City to complement the spirit of *City of Yes*. In particular, the Administration and City Council should collaborate to ensure that the City's Department of Housing Preservation and Development has the appropriate staffing and financial resources to allow affordable developments to break ground quickly. These resources could also be used to update the City's leasing process and guidelines to accelerate lease-up and stabilization.

In summary, Apex believes that the proposed text amendments are modest and necessary to spur development of new homes for New Yorkers and enhance our local economy. Thank you in advance for taking an important step towards addressing New York City's housing crisis.

Regards,


Robert Horsford
President, Apex Building Group

From: [Arden Strasser](#)
To: [Land Use Testimony](#)
Subject: [EXTERNAL] city of yes support
Date: Friday, October 25, 2024 10:48:06 AM

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Dear City Council:

I am contacting the City Council in support of the City of Yes proposal. More specifically, I am in support of the City of Yes in general and the provisions related to air rights transfers for landmarked buildings. These are helpful, given how the provisions for air rights transfers for a landmarked building by the zoning resolution has been so restrictive for so long, allowing for less than 15 landmark transfers over the decades. Further, these transfers to date have only happened in the limited neighborhoods of midtown and FIDI.

Thank you for your time and consideration regarding the proposal.

Arden C. Strasser
Manhattan resident



From: [Ari Lebowitz](#)
To: [Land Use Testimony](#)
Subject: [EXTERNAL] Support Lifting Parking Requirements
Date: Wednesday, October 23, 2024 7:55:23 AM

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To Whom it May Concern:

I am a Brooklyn resident writing to voice my support for lifting parking requirements for new construction under the City of Yes plan. New York is in dire need of more housing and statistics show that the vast majority of New Yorkers do not own a car and utilize transit for the majority of their travel. With such limited land available for development in our city, we should be prioritizing homes for people over storage for vehicles, and in a time of accelerating climate change, we should be doing everything possible to discourage private car trips.

Thank you for your time and consideration,
Ari Lebowitz

From: [Aria J](#)
To: [Land Use Testimony](#)
Subject: [EXTERNAL] City of yes zoning for housing opportunity (reject)
Date: Wednesday, October 23, 2024 8:02:19 AM

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Dear city council members,

I have lived and worked in every borough of New York City from Flushing to Bronx and now living in Bayside Queens. I Worked hard to move to only location left Bayside. Living in a nice neighborhood provides a sense of security and peace of mind, with well-maintained homes and green spaces enhancing the overall aesthetic appeal. Friendly neighbors and a strong sense of community further contribute to the enjoyment of living in such a pleasant environment. Why are you changing that?

I am writing to express my strong **opposition** to the City of Yes housing opportunity proposal due to the detrimental impact it would have on our community's quality of life and the well-being of our neighborhood. The proposed development would exacerbate congestion in our already crowded area, leading to increased traffic, noise, and air pollution. Moreover, the scale of the project risks destroying the character and charm of our neighborhood, which has long been cherished by its residents. As a concerned citizen, I urge you to reject this proposal in order to preserve the livability and integrity of our community for current and future generations.

For your solution of housing crisis is due to the laws passed which make it hard to evict squatters, non paying tenants which takes 2 years to evict . My personal experience it took us 4 years to evict a non paying tenant! Due to that we are no longer renting . So support mom and pops landlords to evict without the cost of punishing them because of bad tenants.

Thank you

From: [Arlo Chase](#)
To: [Land Use Testimony](#)
Subject: [EXTERNAL] Testimony in Favor of City of Yes by Arlo Chase of Services for the UnderServed,
Date: Wednesday, October 23, 2024 8:26:56 AM

[REDACTED]

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Good morning,

My name is Arlo Chase, and I am the Senior Vice-President for Real Estate at Services for the UnderServed and I am pleased to submit **this testimony in favor of the City of Yes proposals before the NYC Council.**

Services for the UnderServed, Inc. (S:US) is a New York not-for-profit, 501(c)(3) housing and social service provider. As one of the largest providers of community-based human services and housing in the state, S:US' team of over 1800 dedicated staff serve over 38,000 New Yorkers each year. For more than four decades, S:US has served individuals and communities who face many complex and intersectional issues compounding with poverty and socioeconomic needs such as people who have lost their homes, people with mental illnesses and addiction challenges, people living with HIV/AIDS, people with autism and other developmental disabilities, survivors of domestic violence and veterans. Many of our consumers are people of color and come from various cultural backgrounds.

At the core of S:US's mission and values is a belief that every individual has the potential to create a life full of meaning. We envision a city where everyone has a roof over their head and has an equal opportunity for a healthy, productive life within a vibrant community. Most importantly, our vision mandates we deliver services of equal quality, whether it be to one individual or to thousands. By addressing the complex circumstances of each individual, we change lives, improve neighborhoods, and help break the cycle of poverty for future generations of New Yorkers.

S:US is one of the leading social services agencies in the care of individuals with behavioral health needs such as serious mental illnesses or a substance use disorders. The majority of our clients have experienced homelessness in the years prior to intervention.

- Affordable/Supportive Housing Portfolio

As part of the effort to house our most vulnerable citizens and decrease the homeless

census, S:US also develops and operates both supportive housing and affordable housing for low-income individuals. Our housing is especially intended for those whose circumstances have left them in need of a stable home. Each night, S:US provides housing and shelter to more than 4,500 people.

S:US' Housing Portfolio consists of 75 residential buildings are owned and managed by S:US to provide desperately needed housing to our consumers. Over 1,200 additional units are leased by S:US to provide scattered site supportive apartments throughout the Bronx, Brooklyn, Manhattan, and Queens. S:US has developed 19 Low Income Housing Tax Credit buildings with 964 units of supportive and low-income housing owned and operated by the organization, and currently has 1000+ units under construction. We also currently have an additional 2000+ units in our LIHTC development pipeline. Our operating budget was \$275 million last year and we are committed to continuing to growing our housing portfolio responsibly.

S:US is testifying in favor of the City of Yes proposals because we know that they can help alleviate the City's housing and affordability crisis. We know that NYC needs more housing in every neighborhood and at all income levels, especially for the lowest income New Yorkers. By making sensible reforms to outdated zoning codes, City of Yes will eliminate the need for parking and create the Universal Affordability Preference. These two initiatives on their own, will create thousands of more apartments and a large number of income restricted units.

Thank you for your consideration and feel free to contact me if you have any questions.

Best regards,

Arlo Chase

Pronouns: he/his

Senior VP Real Estate

[REDACTED] | New York, NY 10018

O:
[REDACTED]



Services for the Underserved, Inc.

"Opportunity for All"



Join us in our work to right societal imbalances and build a city of opportunity for all. For \$1 a day or a custom

recurring gift of any amount, you can [become a S:UStainer](#).

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Dear Department of Land Use and Planning,

This letter is our written testimony in opposition to the City of Yes proposal.

We are Artists Against Displacement, a 500+ member, volunteer-run local organization of artists and art workers concerned about displacement and housing disparity in New York City.

We firmly believe that Mayor Adams's City of Yes Housing Opportunity (COYHO) will make the affordability crisis in NYC worse, not better.

Over the years, our group has joined up with other grassroots organizations to propose legislation and zoning changes that could manifest true solutions to our affordability crisis. Every time we proposed something, like the Chinatown Working Group Rezoning Plan or Commercial Rent Stabilization, you told us that these proposals were too far reaching, that they would have “unintended consequences”.

Now it's our turn to tell you that The City of Yes will lead to far too many “unintended consequences”.

Our community has witnessed first hand how the building of luxury (aka ‘market rate’) development in currently affordable areas creates primary and secondary displacement as rents in adjacent areas rise. Many of the provisions in City of Yes are a step backwards, not forward. Changing fire-life-safety codes that affect means of egress or reducing setbacks so that less light and air reach dwelling units will lead to deaths and unhealthy living conditions – a return to 18th century living conditions.

Getting rid of ULURP so that the community doesn't have a voice in what happens in their own back yard will degrade the trust we have in our local government.

We support community-based solutions like the Chinatown Working Group Rezoning Plan.

We support efforts to keep people in their home.

We support opportunities for people to own their own home

We support eviction reform.

We support rent reform.

We support taking property away from bad landlords.

We support a pied e terre tax.

We support returning to a time when the city built low and middle income housing, not for-profit developers.

City of Yes is a big win for the REBNY, not the people of New York City.

Sincerely,

Art Against Displacement

aad.nyc@riseup.net

[EXTERNAL] Testimony in support of "City of Yes"

Athanasios M. <[REDACTED]>

Tue 10/22/2024 10:44 PM

To: Land Use Testimony <landusetestimony@council.nyc.gov>;

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Hello Councilmembers,

My name is Athanasios. I was born and raised in Astoria, Queens by immigrant parents that came here in the 70's. As a carpenter and a server, my parents were able to successfully build roots here due to the fact that they were not burdened by housing costs. They were able to rent an apartment and eventually purchase a two-family home without putting themselves at financial risk. Today this has become increasingly out of reach to my generation due to the exorbitant cost of housing and will continue to be the case for generations to come, should we choose to do nothing about it.

The current status quo of onerous zoning means that only the largest and most well-funded developers will be able to actually build, which is inherently not equitable. Furthermore, restrictions such as parking minimums don't provide options for more cost-efficient developments. Costs of building out parking facilities not only reduce the number of units that can be built, but as a direct result, increase the cost of units that do end up getting built. Developers would surely build parking in transit-poor areas that demand parking in order to sell their units. They have all the incentive to do so. That said, the current zoning is non-sensical when it forces developers to build parking in transit-rich areas such as Astoria and LIC unless they are able to jump through bureaucratic hoops for case-by-case exemptions.

Finally, as New Yorkers, we must all do our part. While a lot of development in Astoria and LIC has taken place over the years, it is still not enough for an entire city as dense as ours. Supply must be spread out across the entire city in order for it to catch up with the population. NYC is lagging far behind lesser cities in this regard and I know that we can and should do better. All New Yorkers should be given a chance to establish roots here, just like my parents and previous generations.

I fully support "City of Yes" and strongly urge the City Council to move forward with it. Thank you.

Sincerely,
Athanasios M.

[EXTERNAL] City of Yes testimony

Ayanna Telfort <>

Fri 10/25/2024 8:28 PM

To: Land Use Testimony <landusetestimony@council.nyc.gov>;

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Greetings

I apologize for missing the hearing earlier this week but I had conflicts in my schedule.

I am a long-term and 3rd generation resident of St. Albans in Southeast Queens. I want to have my voice heard and let you know my personal opinion of City of Yes.

This may not be popular but I am 100% against the City of Yes. I know that we are in a housing crunch out here in Queens and across NYC but I don't believe the City of Yes plan is constructed to effectively address housing without grave destruction to historic residential neighborhoods like those you'll find in Southeast Queens. We have struggled to maintain beautiful and historic homes in the area. There is a lot of potential to preserve Dutch-style, mason-designed homes and tree-lined blocks.

I also don't think that the infrastructure of our neighborhoods could support the over-development that I believe would ensue should the City of Yes plan pass.

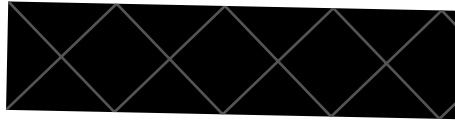
I urge the council to vote no on this plan and to ask our City administration to articulate changes to the plan that better support the middle-class in NYC's boroughs and preserves the understated beauty and historic value of these neighborhoods.

Thank you for hearing me out.

Warm regards,
Ayanna Telfort

To all concerned,

We, at



strongly oppose the "City of Yes" proposal. We do not have the infrastructure to support the influx of traffic and individuals, to overcrowd our childrens schools, our streets and neighborhoods, and have a negative effect on our well-deserved quality of life.

- Barbara Sullivan

From: [Barbara Blasucci](#)
To: [Land Use Testimony](#)
Subject: [EXTERNAL] City of Yes Plan
Date: Wednesday, October 23, 2024 7:48:03 AM

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To Whom it May Concern:

The City of Yes plan, a 1 glove fits all agenda, is a poor fit for our community. This proposal will put additional burden on already overwhelmed infrastructure in flood prone areas. Place stress on already overcrowded and many underperforming schools. In most situations increased population and density will jeopardize public safety. Our police force, fire department, EMS, health and human services cannot withstand additional work loads. This aggressive plan will remove parking mandates for new development projects. Our car-centric, low density R 1 - R 5 neighborhoods are already parking deprived. A housing crisis is the alleged reason for this over reaching plan. However, allowance of tens of thousands of new entrants to our city while there is a crisis is akin to strategically placing additional holes in a sinking ship. New York City cannot maintain their sidewalks Over 9,000 sidewalks damaged by tree roots await repair. The repair wait list exceeds 5 years. New York City please fix what you have before adding more. Go back to the drawing board and do a district by district assessment. Determine which fingers properly fit the gloves and bring a modified product back to the respective council members and their constituents for approval. Force feeding creates a gag reflex. This plan in its current state is not digestible for many New Yorkers. Thank you in advance for your anticipated cooperation.

Barbara Blasucci
Bronx, NY 10461

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From: [Barbara Collins](#)
To: [Land Use Testimony](#)
Subject: [EXTERNAL] The City of Yes
Date: Wednesday, October 23, 2024 4:13:31 PM

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To Whom it May Concern:

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Sincerely,

 S
465

Good morning Speaker Adams, members of the City Council, other elected officials, and fellow civic leaders, all of whom are volunteers.....none of whom are paid...My name is Barbara Larkin , a retired NYC elementary school teacher and past president of the Belle Harbor Property Owners Association, a well-respected 70year old civic organization of over 1300 families which I am honored to represent. Its mission: to improve the quality of life of taxpaying homeowners. As a VP of Queens Civic Congress, I've participated in zoom meetings & rallies & I can confirm representatives from Springfield Gardens, Howard Beach, South Ozone Park, Cambria Heights, Neponsit, and Forest Hills just to name a few are adamantly opposed to this proposal. Objections include, but not limited to, lack of infrastructure needed to absorb increased density, absence of enough classroom seats to accommodate mandates limiting class size. If you think parking, traffic, and crowded streets are horrendous now, just imagine what increased density will do to our city. The population is now below 8,000,000 due to hundreds of thousands of taxpayers moving to other states. If this proposal, which is a top down, Robert Moses approach, is approved, hundreds of thousands of hard working New Yorkers would pack up & leave for sure. I thank God for the city council members who understand that much goes into rezoning....in 2008 dozens of civics worked cooperatively with John Young and together reached consensus. Recently, real estate developers have shared with me that there now exist more than enough empty housing units and that passing this draconian proposal is totally unnecessary! For those of you who are familiar with the series of books entitled Choose Your Own Adventure.....where the reader chooses the ending of a story.....I want you to imagine NYC's future:

Choice 1:....Decades from now NYC would be a designated one of the most magnificent cities in the United States ...comprised of gorgeous high-rises in Manhattan and lovely quaint neighborhoods in its outer boroughs equipped with great schools, terrific hospitals, adequate updated infrastructure, and plenty of fresh air. Residents are happy!

Choice 2: Decades from now NYC is a city which was abandoned by all its dedicated civic leaders, has unbelievably horrendous congestion denying elder parishioners the ability to attend church services, and constant water main breaks due to increased density of tall buildings throughout its outer boroughs.....
Developers are thrilled!

I implore you allChoose the Ending #1. Your children & grandchildren will applaud your legacy!

Thank you.....Barbara S. Larkin

[EXTERNAL] No to City of Yes

Barbara Turoff <>

Fri 10/25/2024 4:16 PM

To: Land Use Testimony <landusetestimony@council.nyc.gov>;

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I am sorry this is being sent late - I am recovering from surgery - but I and my husband, Richard Turoff, as members of the Victorian Flatbush community, are opposed to this proposal (City of Yes) which threatens our historical community. Traffic is already untenable on Beverley Road, and the neighborhood's uniqueness as an architectural asset should be protected. A one size fits all urban planning approach to a city of NY's size does not make sense.

sincerely,
Barbara Turoff
Sent from my iPhone

[EXTERNAL] Please remove parking minimums

Bee Friedman <>

Wed 10/23/2024 10:17 AM

To: Land Use Testimony <landusetestimony@council.nyc.gov>;

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Hello City Council,

I would like to submit my input to the city of yes zoning law changes, specifically in support of the removal of parking minimums for developers. This is a transit rich city (frankly I wish it was far more transit rich) and that means parking spaces are simply less of a necessity than housing. I am all for the space that would have been used to house cars going to house people instead. There are a thousand other places in this country people can go if they want to use a car as their primary transit method and very few except here if they don't. Please remove the parking minimum requirements for developers.

Thank you,
Bee Friedman

From: [Ben](#)
To: [Land Use Testimony](#)
Subject: [EXTERNAL] Lifting parking requirements
Date: Wednesday, October 23, 2024 12:19:01 AM

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As a resident of NYC for 11 years, I'd like to put it on file that I wholeheartedly support lifting parking requirements.

Additionally, I think Councilwoman Paladino's use of insults towards those who are not born in NYC as an argument tactic is beneath us as New Yorkers and frankly is embarrassing.

[EXTERNAL] City of Yes Zoning for Housing Opportunity

Ben Grubner <



Wed 10/23/2024 2:30 PM

To: Land Use Testimony <landusetestimony@council.nyc.gov>;

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To whom it may concern,

I support the City of Yes Zoning, it is very important that we lift/remove the parking mandate. New York needs more housing and better zoning.

Warmly,

Ben

Ben Grubner | Customer Success Associate

Image

 New York, NY 10036

pei.group

From: [Ben Turndorf](#)
To: [Land Use Testimony](#)
Subject: [EXTERNAL] I support City of Yes!
Date: Wednesday, October 23, 2024 6:11:02 AM

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I'm writing to say that I support lifting parking mandates, and am otherwise wholly in favor of all the proposals in City of Yes: Housing Opportunity.

Thank you,
Ben
Brooklyn

From: [Jacqueline Bosco](#)
To: [Land Use Testimony](#)
Subject: [EXTERNAL] Oppose the City of Yes
Date: Wednesday, October 23, 2024 6:24:53 PM

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To Whom it May Concern:

The City of Yes plan, a 1 glove fits all agenda, is a poor fit for our community. This proposal will put additional burden on already overwhelmed infrastructure in flood prone areas. Place stress on already overcrowded and many underperforming schools. In most situations increased population and density will jeopardize public safety. Our police force, fire department, EMS, health and human services cannot withstand additional work loads. This aggressive plan will remove parking mandates for new development projects. Our car-centric, low density R 1 - R 5 neighborhoods are already parking deprived. A housing crisis is the alleged reason for this over reaching plan. However, allowance of tens of thousands of new entrants to our city while there is a crisis is akin to strategically placing additional holes in a sinking ship. New York City cannot maintain their sidewalks Over 9,000 sidewalks damaged by tree roots await repair. The repair wait list exceeds 5 years. New York City please fix what you have before adding more. Go back to the drawing board and do a district by district assessment. Determine which fingers properly fit the gloves and bring a modified product back to the respective council members and their constituents for approval. Force feeding creates a gag reflex. This plan in its current state is not digestible for many New Yorkers. Thank you in advance for your anticipated cooperation.

Benedetto Bosco

[REDACTED]

Bronx, NY 10461

[EXTERNAL] Public Hearing Testimony Submission: "City of Yes For Housing Opportunity" Proposed Zoning Text Amendment


Benjamin Tocker <

Wed 10/23/2024 3:13 PM

To: Land Use Testimony <landusetestimony@council.nyc.gov>;

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Good afternoon,

My name is Benjamin Tocker, residing at  in Brooklyn, and I am writing to submit my support for the proposed "City of Yes" zoning text amendment, including the provision to remove parking mandates for new construction. I am a lifelong New Yorker and a renter, and I urge you to consider any measures possible to alleviate the housing crisis that threatens New York's affordability for renters such as myself.

The removal of parking mandates will positively impact the lives of renters who have the high cost of parking construction passed on to them *regardless of whether or not they own a car*. This is just one example of the many ways in which our City's infrastructure has been designed around catering to private automobile owners who *do not* represent the majority of our City's residents. Beyond eliminating parking mandates and leaving the decision to build parking in the hands of developers, I urge you even further, in no uncertain terms, to do *everything in your power* to reverse the ever-increasing threat to public health and safety caused by this uncontrolled downward spiral of private vehicles congesting our city's streets and harming our fellow New Yorkers.

Furthermore, I find Council Member Palladino's ad hominem attack against one of the citizens submitting testimony, *solely on the basis of their birthplace*, to be reprehensible. Like millions of other New Yorkers, I descended from immigrants, and I am beyond insulted to hear a New York City Council Member so blatantly and proudly proclaim disdain for someone's decision to immigrate here and seek to contribute to improving life here. Council Member Palladino expressed her refusal to listen to expertise on this basis alone. An attitude of such disregard for expertise is unacceptable, and would have threatened every bit of progress we have ever made as a city had it been used in the previous generations who guided our City to where it is today. This sort of attitude has absolutely no place in our legislature.

Thank you for considering my testimony.

Sincerely,
Benjamin Tocker

From: [berdj.stepanian](#)
To: [Land Use Testimony](#)
Subject: [EXTERNAL] Oppose city of yes
Date: Friday, October 25, 2024 9:19:28 AM

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The City of Yes plan, a 1 glove fits all agenda, is a poor fit for our community. This proposal will put additional burden on already overwhelmed infrastructure in flood prone areas. Place stress on already overcrowded and many underperforming schools. In most situations increased population and density will jeopardize public safety. Our police force, fire department, EMS, health and human services cannot withstand additional work loads. This aggressive plan will remove parking mandates for new development projects. Our car-centric, low density R 1 - R 5 neighborhoods are already parking deprived. A housing crisis is the alleged reason for this over reaching plan. However, allowance of tens of thousands of new entrants to our city while there is a crisis is akin to strategically placing additional holes in a sinking ship. New York City cannot maintain their sidewalks Over 9,000 sidewalks damaged by tree roots await repair. The repair wait list exceeds 5 years. New York City please fix what you have before adding more. Go back to the drawing board and do a district by district assessment. Determine which fingers properly fit the gloves and bring a modified product back to the respective council members and their constituents for approval. Force feeding creates a gag reflex. This plan in its current state is not digestible for many New Yorkers. Thank you in advance for your anticipated cooperation.

Sent from my Verizon, Samsung Galaxy smartphone
Get [Outlook for Android](#)

SUBCOMMITTEE ON ZONING AND FRANCHISES
CITY OF YES—HOUSING — CITY HALL CHAMBERS, NEW YORK, NY
IN-PERSON AND ONLINE TESTIMONIES
Tuesday – October 22, 2024 – 9:30 A.M.

In-Person Testimony prepared by Bernadette Ferrara

Tuesday, October 22, 2024

President of Van Nest Neighborhood Alliance (VNNA)
Member of CEBCA, Life-long NorthEast Bronx Resident

Good morning Chair Riley and Members of this Committee,

My name is Bernadette Ferrara and I represent thousands of families in the NorthEast Bronx. I am President of the Van Nest Neighborhood Alliance, a member of CEBCA, former Chair and 17-year Board Member of Bronx Community Board 11 and a life-long NorthEast Bronx resident still living in one of the oldest neighborhood of Van Nest established in 1853.

I am urging City Council to reject the City of Yes – Housing Opportunity in its entirety! For the past year and a half many like myself have testified that we do not have a “housing shortage” but an “affordability crisis”. There are no HPD programs that lead to “home ownership” and we need to prioritize on our infrastructure. Earlier this month, at the eleventh hour with the vote in City Council, Speaker Adrienne Adams said before voting on the City of Yes changes, the Council will be developing a “Housing Action Plan” that includes affordability(?) and will be attached(?) to the City of Yes – Housing Opportunity.

This is a tactic to get a “YES” vote from City Council. Do NOT take the bait! If you care about the communities that voted you into office, you will fully reject this, vote “NO in its entirety” and protect your communities. Next year, 34 City Council Members will be up for re-election and your constituents will remember how you voted. As diverse are our ethnicities so are the unique, diverse, characteristics of each community! We need your “NO” vote to protect and preserve these special qualities.

And how can you vote “YES” on an initiative that will take away both community AND City Council input on Land Use items???

Please vote 100% “NO” on this initiative. Tell City Planning to go back to the drawing board and start again using the specifics of the “Housing Action Plan” which are affordability, home ownership and infrastructure.

Thank you.

PS –This is in response to a question asked by CM Shahana Hanif that stated minimal housing made in BxCB11. I would like to update the Council Member. With the upzoning of Blondell Avenue in BxCB11 on Dec. 18, 2018, BxCB11 has 1340 Blondell Commons that houses a percentage of homeless. Also on Jan. 29, 2020 the 200 bed homeless shelter for men is almost completed. On Jan. 25, 2021, 1682 Stillwell Avenue began and is completed as a Senior Woman Shelter. On July 16, 2021, at 2443 Poplar Street a new men’s shelter is almost completed. We also have the Just Homes/1900 Seminole Project to house severely medically complex Riker Island homeless and detainees which over the past months has trickled down to also housing pedophiles with no security. BxCB11 will also be burdened with 80% of the 46 block upzoning of the Metro-North Area Study! So now, BxCB11 will be oversaturated with housing. Both the communities of Van Nest and Morris Park should be able to opt-out of any City of Yes–Housing upzoning proposals since we would have given **more than** our “fair share”. Don’t you think that would be fair? Just to add, for the past 10 years, houses small and very large, have been and are being built in ALL the neighborhoods of BxCB11!! Housing continues to be built. So I question this false statement and misleading information about BxCB11.

From: [Bette](#)
To: [Land Use Testimony](#)
Subject: [EXTERNAL] No to this Proposal, it will ruin many
Date: Friday, October 25, 2024 9:42:39 AM

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To Whom it May Concern:

This city of yes plan will be the ruination of so many neighbors in the outer boroughs, and will force residents who opted to live in less denser neighborhoods to move out of the city, hard working middle income tax payers who used their life savings to purchase their single, two or three family homes. And this is not even taking into account that the infrastructure can not handle the amount of homes that are here already. The sewers and storm drains can not keep up with heavy rainfalls, and our basements are flooded because of this, and the electrical grid can not handle to load as it is now. Please reconsider your actions, and not fall to the false promises of real estate developers who promise lower rents, lower rents that are still unaffordable, which will mean only the city will need to spend more money subsidizing rent for those who can not afford to pay that supposed more affordable housing. Promises and lies, that is all it is.

I have lived in the Bronx my entire life, became a police officer and worked in the Bronx for 20 years, I worked through the worst of times in the 80's, saw improvements through the 90's and into the 2000's, and since my retirement I have witnesses a decline in quality of life, a rise in petty and not so petty crimes. A plan like this will not only depersonalize neighborhoods, but will be NYC's downfall, financially, the only ones who will profit are the developers.

Please reconsider this plan, thank you, Bette Tobias, [REDACTED], Bronx, NY 10465

PS

Other points and reasons why my fellow neighbors are against this plan:

The City of Yes plan, a 1 glove fits all agenda, is a poor fit for our community. This proposal will put additional burden on already overwhelmed infrastructure in flood prone areas. This proposal will place more stress on already overcrowded and many underperforming schools. In most situations increased population and density will jeopardize public

safety. Our police force, fire department, EMS, health and human services cannot withstand additional work loads.

This aggressive plan will remove parking mandates for new development projects which is already a minimal requirement. Our car- centric, low density R 1 - R 5 neighborhoods are already parking deprived.

A housing crisis is the alleged reason for this over reaching plan. However, allowance of tens of thousands of new entrants to our city while there is a crisis is akin to strategically placing additional holes in a sinking ship.

New York City cannot maintain their sidewalks Over 9,000 sidewalks damaged by tree roots await repair. The repair wait list exceeds 5 years. New York City please fix what you have before adding more.

Go back to the drawing board and do a district by district assessment. Determine which fingers properly fit the gloves and bring a modified product back to the respective council members and their constituents for approval.

This plan will be the ruination of the areas many

Force feeding creates a gag reflex. This plan in its current state is not digestible for many New Yorkers. Thank you in advance for your anticipated cooperation.

From: aleacfo@aol.com
To: [Land Use Testimony](#)
Subject: [EXTERNAL] City Of Yes Voting
Date: Wednesday, October 23, 2024 5:18:22 PM

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PLEASE VOTE NO ON THE CITY OF YES.
THANK YOU
Bill Wilkens
S.I.N.Y

[EXTERNAL] PASS THE CITY OF YES AND ELIMINATE PARKING MANDATES!!

Binyamin Radensky <

Tue 10/22/2024 11:18 PM

To: Land Use Testimony <landusetestimony@council.nyc.gov>;

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Our city is suffering from an affordability crisis, the likes we haven't seen in 50 years. At the same time, our transportation system has gotten worse and worse (and is slowly starting to improve now). Allowing our city to grow organically as it had from hundreds of years (which is what created beloved neighborhoods such as Greenwich village and Brooklyn heights) will also help make the city more affordable, more beautiful, more livable, and it will give our transit system even more ridership allowing it to grow and expand. Please VOTE YES to all of the proposals in city of yes ESPECIALLY THE END TO PARKING MANDATES, and remember that this is just the beginning. There is a lot more work to do. Thank you so much for your consideration.

Best,
Binyamin
10025

From: [Bob Sauer](#)
To: [Land Use Testimony](#)
Subject: [EXTERNAL] city of yes
Date: Friday, October 25, 2024 10:08:12 AM

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NO!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!

October 25, 2024
New York City Council
City of Yes for Housing Opportunity Public Testimony

My name is Bobbi Barnett, and I am lifelong New Yorker, Manhattan resident, a Manhattan Community Board Four member, and have worked on housing policy issues for the better part of a decade. This testimony represents my own views and not those of my employer nor any affiliated organizations.

I am writing to encourage the New York City Council to vote to approve the City of Yes for Housing Opportunity text amendment in full. I do not need to reiterate the real human costs of our failure to create housing to match the existing need, nor the way in which failing to meaningfully update our zoning code in over 60 years has prevented the type of housing New Yorkers increasingly need from being built.

On a personal level, this lack of available housing has made it more challenging for myself and my peers to remain in one apartment for longer than a few years, and ultimately to see a long-term future in our neighborhoods and the city overall.

There is a lot to like about the very many proposals in City of Yes, and I am particularly excited to see the reduction and elimination of the dwelling unit factor and universal affordability preference (UAP) in creating more housing and more of the types of housing that our city needs.

Eliminating the dwelling unit factor unlocks new housing opportunities for groups that are currently stuck in place. Creating shared housing can enable young people to afford to live without roommates and free up family-sized apartments. Shared housing models can also help more of those living in shelter to move into permanent supportive housing.

UAP would create new permanently rent-stabilized units for those who are increasingly priced out of communities like mine. While I have heard concerns about allowing developers additional height as a part of UAP, I believe the benefits of additional affordable units are well worth the modest additional height those buildings may bring.

Many community boards and members of the public have derided the City's one-size-fits all approach and the lack of input that communities will have in these proposals moving forward. While I encourage the Council to consider substantive feedback to modify these proposals from those who are engaging in good faith, easing the review process for housing we want to see by doing the review up front has the power to address our dire housing shortage more quickly. And as we are falling short of hundreds of thousands of units today, we cannot afford to lose time in an effort to increase our supply of housing.

My own community board, representing Hells Kitchen and Chelsea in Manhattan, provided a negative conditional recommendation for this text amendment, citing concerns relating to unintended consequences and that the community would have a stronger negotiating position if it were to vote no. Having been involved in the board's discussion of the issue, I believe that the negative recommendation was a misguided choice given the board's more general support of the proposals under consideration. Unfortunately community boards consistently underrepresent the views of younger individuals and renters— the exact people who stand to gain the most from the proposals outlined in the City of Yes proposals. Community boards are structurally inclined to want more discretionary review for housing projects, a laudable goal, but one that will only serve to add time and cost to digging our way out of the housing crisis. It is important to consider the lack of input from all voices in community board recommendations. While I am supportive of many of the board's recommendations and encourage you to consider them in your review, I've entailed specific concerns below:

Eliminating the Dwelling Unit Factor

Manhattan Community Board 4 (MCB4) included a recommendation that buildings not be allowed to be 100% studios, citing the concern that people would not be able to move within buildings as their life circumstances change. This concern demonstrates an outdated understanding of how most market-rate renters seek housing in the midst of a dire shortage. For almost every renter I know, the search to remain in one's neighborhood begins with a broker or listing service like StreetEasy, as an apartment opening up in one's own building is a relatively rare occurrence. Since the early 2000s, the consensus among expert groups like the Citizens Housing and Planning Council have indicated that as demographics shift to more and more households living alone, a failure to meet demand for studios and one bedrooms pushes those individuals into family-sized apartments. When individuals who would prefer to live alone do not have a cost-effective option that meets their needs, they occupy and subdivide multi-bedroom apartments that are then no longer available for families with children. Our lack of family-size apartments underscores our need for a lot more studios to free up family-sized apartments— not further restrictions on how many studios can be built in an individual project.

Beyond the need to create these units, there are reasons to believe that the risk that private developers will build 100% studio buildings en masse is not high: the trend of dwelling unit sizes going up in prime Manhattan and the requirements in the new 485-x ensuring the creation of affordable family-sized apartments. In its presentation to MCB4's Housing, Health and Human Services committee meeting, the Department of City Planning explained that unit sizes in prime Manhattan below 96th Street are increasing, largely due to the increasing sizes of high-end apartments that command very high rents and purchase prices per square foot. Nothing about the elimination of the dwelling unit factor should make these large apartments less profitable to

build, and therefore, we should not expect that eliminating the dwelling unit factor would change those circumstances to create neighborhoods of primarily single households. Furthermore, the use of the newly-created 485-x tax exemption encourages the creation of affordable two-or-more bedroom apartments. Given that approximately 70% of new developments of more than four units between 2010 and 2020 utilized a similar as-of-right tax exemption (421-a), we have reason to believe that most new private development will use the exemption as well. The use of this exemption, which expires in 2034, will help to foster a mix of unit sizes—both affordable and market—around the City.

For these reasons, I urge the City Council to support a proposal that would allow for at least a limited number of buildings that could be all or mostly studios.

Campus Infill

MCB4 indicated preference for a 100% permanent affordability requirement for campus infill on publicly-owned land. While this preference is conceptually admirable, it undercuts one of the reasons for the use of “campus infill” in the first place: to raise funds for publicly-assisted housing developments and community organizations. Furthermore, having a 100% affordability requirement on a campus denies the owner, if they so choose, the ability to create integrated mixed-income housing. I urge the City Council to consider the financial health of public developments in recommending affordability requirements to the campus infill proposal.

Universal Affordability Preference (UAP)

MCB4 expressed a preference that UAP only provide density bonuses within existing height limits and that its density bonuses should be modified via geographically-specific text amendments rather than via the existing proposal. These recommendations stem from the notion that UAP as proposed would fundamentally transform our neighborhoods—one that has weaponized concerns over incremental height increases in order to oppose a powerful new inclusionary housing tool that can help existing residential areas grow over time.

Examining the evidence, there is not a reason to believe that UAP as written would fundamentally transform the built environment. While UAP would allow for a small increase in heights over existing zoning, the idea that it would result in countless projects and major displacement is alarmist. We can take as evidence the existence of the Affordable Independent Residence for Seniors (AIRS) preference in effect from 2019 to 2021 upon which UAP’s density bonus was based. Despite the availability of the preference, relatively few AIRS projects were constructed throughout the city. In MCD4, only one project was constructed at 278 8th Avenue, of which MCB4 expressed its support. Given that the density bonus in AIRS did little to transform our neighborhoods, the similar density bonus in UAP would also likely have only a

small impact. Furthermore, there is not a meaningful market push to slightly enlarge existing buildings simply to add extra affordable floor area. Much of MCD4 is not built to its zoned capacity today, and there have been relatively few enlargements and demolitions that are replaced with larger buildings as of right over the past decade. If there was truly such a market pressure to build larger, one would expect much more activity to redevelop existing structures. While the Council should take any measures in its power to protect tenants from displacement due to enlargements or demolitions resulting from UAP, it should not fear that the proposal would lead to substantial changes to the neighborhood character.

While there would almost certainly be taller buildings constructed under UAP than there could be built as-of-right today, the additional heights are incrementally greater than existing zoning, including that of our special districts. The heights included in UAP are contextual and reasonable, and I am hopeful that the Council recommends approval of UAP with an included density bonus for the inclusion of affordable housing.

MCD4 has been a leader in housing production in the past decade primarily due to large infill projects. The community board builds support for projects by effectively limiting density where there's already housing in exchange for more density in commercial and manufacturing areas. This has had a few consequences—much of the new housing is built in commercial or manufacturing areas, sparing concerns of neighborhood character but preventing the integration of older and newer housing types throughout the neighborhood. Allowing a little more housing to be built near existing residential buildings would allow slow and sustainable growth in areas in MCD4 that typically do not see a lot of housing growth.

Finally, while it is important to focus on proposals that would increase housing in all communities, I urge the Council to ensure that its ultimate recommendation does not exempt one neighborhood or set of neighborhoods from their obligations to create housing. New York City's housing market is just that—a market. What affects one neighborhood has an impact on other communities and residents around the City.

Throwing up roadblocks by adding additional layers of review for the types of housing we want cuts against our ability to provide housing for New Yorkers— not just in the immediate term, but perhaps for decades down the line. We are experiencing an acute shortage in 2024 because of cumulative failures to adapt zoning for many decades— let's not let the past repeat itself.

I thank you for your time and careful review of these proposals, and once again urge your approval of this text amendment in full.

[EXTERNAL] Lift parking mandates

Bradley Frederick <



Sat 10/26/2024 12:14 AM

To: Land Use Testimony <landusetestimony@council.nyc.gov>;

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To whom it may concern,

I moved to New York City a few years ago. Like many fellow New Yorkers, I do not own a car, but I am impeded daily by their presence. Cars are an invasive species in our cities that need to be limited in use. Parking mandates take away key space that could be used for parks, housing, schools, or many of the other issues New York City residents want to see resolved. In a city where public transit is the lifeblood of the economy, parking mandates are a relic and should be eliminated to continue bringing our city into the future.

Best,
Bradley

[EXTERNAL] "City of Yes" Support

Brandon Tesh <

Mon 10/21/2024 8:12 PM

To: Land Use Testimony <landusetestimony@council.nyc.gov>;

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To the Members of the City Council,

I am writing to express my *strong* support for the City of Yes housing proposal. As a New York City resident, I have experience firsthand the growing housing crisis that affects our city. So much so, that I've recently begun seeking employment opportunities outside of New York. I am speaking as someone earning a \$100,000 to \$125,000 salary. The City of Yes proposal offers a pragmatic and progressive approach to address this urgent issue.

The proposal's emphasis on increasing affordable housing, promoting sustainable development, and encouraging inclusive communities aligns with the values and needs of New Yorkers. By adopting this proposal, we can create a more equitable and vibrant city for all residents, ensuring that everyone has access to safe, affordable housing. Recently, I have begun pursuing employment opportunities in Minneapolis, Minnesota. 6 years ago, Minneapolis eliminated strict single-family zoning. As a result, it has the lowest rental price increases in the entire country over the past 5 years. Just 1%. By comparison, the US average is 30%.

Additionally, it is crucial that we avoid watering down the proposed regulations such as maintaining parking minimums. Reducing or eliminating these requirements will encourage more efficient land use and make room for more housing units. Maintaining such regulations would hinder the city's ability to grow sustainably and inclusively.

I urge you to support the City of Yes housing proposal and take decisive action to improve the quality of life for all New Yorkers., or I am afraid the city is setting up for a hollowing out of our middle class as more residents flee the high cost of housing.

Thank you for your attention to this critical matter.

Sincerely,

Brandon Tesh
10040





Testimony to NYC Council
Committee on Zoning and Franchises
City of Yes for Housing Opportunities
October 22, 2024

Breaking Ground is the largest developer and operator of supportive housing for low income and chronically homeless New Yorkers. We operate over 5000 units of permanent and transitional housing as well as the street outreach program in Brooklyn, Queens and Midtown Manhattan, which connects the most entrenched, long-term homeless individuals with housing and other critical supportive services.

Breaking Ground strongly supports the City of Yes Housing for Opportunity plan.

New York City's housing crisis is dire and intensifying. The root of this crisis is supply. We aren't building enough housing to keep up with demand or with New Yorkers' diverse housing needs. We have seen this firsthand. For example, at our newest development 90 Sands located in Brooklyn's DUMBO district – we received **61,000 applications** for 185 units of affordable housing.

While there is no single quick fix to tackle our housing and affordability crisis head-on, zoning reforms like the City of Yes can ease barriers to adding more housing, especially more affordable housing, across all neighborhoods. Small tweaks to the city's zoning code – like removing parking minimums to make more space for housing or giving developers that commit to building affordable housing a density bonus – can support the creation of over 100,000 new units of housing across the city over the next 15 years.

We've also seen how significant the need for senior housing has been. Breaking Ground is increasingly housing older adults. Over the last five years, the senior population within Breaking Ground's permanent supportive residences has grown to represent nearly 30% of our total resident population. The City of Yes proposals, such as those that would encourage Accessory Dwelling Units, will help ensure that older home-owning residents can establish a new source of income without displacing them from their longtime community. Older New Yorkers who rent would also benefit from increasing housing supply in every neighborhood and added affordability through these reforms, allowing them to age and retire in the communities they love.

New York City's housing crisis demands bold and equitable solutions. The City of Yes for Housing Opportunity is a critical step in the right direction. It's time for every neighborhood to contribute to the solution and embrace the growth and diversity that new housing brings.

Thank you for the opportunity to testify.

Judith Rosenfeld
Vice President, Special Projects
Breaking Ground
jrosenfeld@breakingground.org

From: [REDACTED]
To: [Land Use Testimony](#)
Subject: [EXTERNAL] City of yes say NO
Date: Monday, October 28, 2024 2:37:24 PM

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Good afternoon

Once again it's obvious that the corruption in the Adams administration is pervasive. The "City of Yes" is designed by developers for developers.

I guess Mayor Adams owes these developers financial favors so this is why this horrible idea is being proposed. Our small communities don't want this! NYC has lost 800,00 residents in 6 years. NYC population is under 8 million for the first time in 30 years. We don't have a housing crisis.

Please be advised whoever passes this horrible proposal will never be voted for again.

Brenda DeMelo
Sent from my iPhone

From: [Cheryl Sealey](#)
To: [Desouve, Joel](#); [Speaker Adams](#); [Land Use Testimony](#); [Joseph, Rita](#)
Subject: [EXTERNAL] City Of Yes: Vote No!
Date: Friday, October 25, 2024 10:36:36 AM

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Since 1968 the Prospect Lefferts Gardens Neighborhood Association (PLGNA) has been working towards protecting affordable housing and tenants rights. In view of this mission, we oppose the [Zoning for Housing Opportunity amendments](#) and request that your council members vote "No." These amendments are not ideal. As you are aware, there is not a need for further up-zoning to create housing or affordable housing; in fact, there is a need for "right zoning" to preserve the stability of our residential community, historic architecture and small businesses and ensure that population density does not overwhelm infrastructure, including sewers, public schools, parking, sidewalks, subways and sanitation.

Instead please support community based planning to allow local community boards and council members to determine where and whether zoning or parking waivers are appropriate in exchange for affordable housing or other community benefits and mitigation of environmental effects. Adding density or reducing parking is appropriate in different places in different communities. Most of District 9 is covered by R6 and R7 zoning that would receive massive density increases, leading to the demolition of most of our neighborhood, with current tenants having to leave and wait years before competing with the rest of the city in a lottery for new apartments.

Support non zoning affordable housing strategies, especially affordable housing preservation. According to the city planning equitable development data explorer, 2/3 of Community District 9 dwelling units are in rent stabilized buildings. In addition, over 25,000 units of buildable housing remain possible under the current zoning. Therefore, The zoning amendments will only serve to undermine what is needed in order for our community to thrive.

Thank you for your attention.

Brenda Edwards,

President, Prospect Lefferts Gardens Neighborhood Association (PLGNA)

From: [Brendan Hannon](#)
To: [Land Use Testimony](#)
Subject: [EXTERNAL] Support for City of Yes (from a born and raised new yorker)
Date: Wednesday, October 23, 2024 10:34:15 AM

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Hello, I'm writing to support the City of Yes, particularly the proposal to **remove** parking minimums from new developments.

Cars are lifeless, dumb objects. They have no intelligence, feelings or soul. New York City existed without them for most of its history; they are not necessary to city life, otherwise New York City would only have popped into existence after they were created.

In addition to being, quite literally, dumb, cars also make most humans who sit in them dumb and angry. I can't explain why, but having watched drivers act like dumb, angry toddlers on a daily basis, it is an unavoidable conclusion.

Cities should not cater to cars, nor should they cater to the people who have been made dumb, angry and entitled by cars. The city needs space for people and should be free to develop housing without having to worry about where some dumb cars will sit 90% of the time.

ALSO - Vickie Paladino's disgusting outburst against New Yorkers who move here should be formally reprimanded. I was born here and I know that the only thing that makes a New Yorker is that you be here now, want to contribute, and have no plans to leave. CM Vickie Paladino can go mop floors with her tongue - maybe it will clean out her foul, ugly mouth.

[EXTERNAL] Land Use Testimony for City of Yes: END PARKING MANDATES!

Brennan Ortiz <

Wed 10/23/2024 11:41 AM

To: Land Use Testimony <landusetestimony@council.nyc.gov>;

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Hello,

I support lifting Parking Mandates and City of Yes: Housing Opportunity.

[Brennan Ortiz](#)
[Bronx, NY 10451](#)

[EXTERNAL] Land Use Testimony for City of Yes: END PARKING MANDATES!

Brennan Ortiz <

Wed 10/23/2024 10:50 AM

To: Land Use Testimony <landusetestimony@council.nyc.gov>;

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Hello,

I support lifting Parking Mandates and City of Yes: Housing Opportunity.

I believe that existing parking mandates are significantly handicapping housing production, while contributing to greater car use in our region, which is already costing us greatly in terms of air pollution, traffic congestion, emergency vehicle response times, and public space use/access.

Thank you,

--

[Brennan Ortiz](#)

From: [Brian Mangan](#)
To: [Land Use Testimony](#)
Subject: [EXTERNAL] Land Use Testimony
Date: Thursday, October 24, 2024 10:13:20 PM

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Good evening,

My name is Brian and I am a 41-year-old lifelong resident of New York City. I was born in a transit desert in Queens, went to law school in Brooklyn, and have lived in Queens, Brooklyn and Manhattan as an adult.

I am writing in favor of bike-friendly and pedestrian-friendly policies and in favor of reducing or eliminating parking mandates.

Having lived all across the city, near transit and far from it, I agree with Open Plans and other organizations who believe that parking mandates have been harmful to the city.

Certainly, there are areas of Queens, Brooklyn and the Bronx where people are dependent on cars, and I respect that. Nobody is trying to eliminate cars. In fact, I live in Manhattan and own a car, and struggle with alternate side parking every week. But it's my choice to own a car for my own personal reasons (we have two small children) and I do not expect the city and my neighbors to subsidize me, or for pedestrians or bikers to have a more dangerous existence because of it.

Thank you,
Brian

From: [Brian R](#)
To: [Land Use Testimony](#)
Subject: [EXTERNAL] Parking
Date: Wednesday, October 23, 2024 4:13:33 PM

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I support lifting parking requirements. Most NYers don't have a car and those that do can incentivize builders to include sufficient parking. We need more housing.

From: [Brian Reilly](#)
To: [Land Use Testimony](#)
Subject: [EXTERNAL] Support for lifting parking requirements
Date: Friday, October 25, 2024 6:49:15 AM

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As a resident of Manhattan I fully support lifting parking requirements.
The issue has been studied, documented thoroughly, and all evidence nationwide points to the benefits of doing so. There is no doubt, and there should be no more uninformed, much less disingenuous, “debate”. There is a clear evidence base for these policies. We have used the scientific method that helped bring us out of the Dark Ages. There is no reason to entertain, much less concede, to unsubstantiated claims that parking mandates provide greater value than the proposed alternatives.

October 25, 2024

City Council
250 Broadway
New York, NY 10007

Re: City of Yes for Housing Opportunity

City Council:

I am contacting the City Council in support of the City of Yes proposal. More specifically, I am in full support for the strongest version of the City of Yes in general and the provisions related to air rights transfers for landmarked buildings.

Landmarked Building Transfers – Zoning Resolution (“ZR”) §74-79

The provisions for air rights transfers for a landmarked building by Zoning Resolution §74-79 has been far too restrictive for far too long. The ULURP process, required as part of the Zoning Resolution §74-79 enacted on May 22, 1968 by CP20253, has allowed for less than 15 landmark transfers since 1968.

Further, these transfers to date have only happened in the limited neighborhoods of midtown and FIDI. Landmarked buildings in the remaining geographic areas of the five boroughs have been left on the sidelines with no *viable* mechanism for relief. It is recognized that additional landmark transfers have happened in midtown east under the special provisions of the Midtown East Special Subdistrict rezoning. However, this subdistrict has limited geographic applicability, where again a huge portion of the five boroughs is left with no *viable* mechanism for relief.

Thank you for your time and consideration regarding the passage of this long-needed relief to increase the housing supply and the long-awaited relief for landmarked buildings.

Sincerely,



Brian Strout

BRIAN STROUT

████████████████████ | New York, NY 10128
████████████████████

[EXTERNAL] I support removing parking mandates

Brian Tomlinson <

Fri 10/25/2024 2:46 PM

To: Land Use Testimony <landusetestimony@council.nyc.gov>;

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Parking mandates are costly and unnecessary. They diminish the supply of housing; contributing to our city's debilitating housing crisis. In a transit dense city, they contribute to pollution and congestion. They are an anachronism.

Regards, Brian
Resident, Brooklyn

Sent from my iPhone

From: [Brita Kube](#)
To: [Land Use Testimony](#)
Subject: [EXTERNAL] City of Yes
Date: Friday, October 25, 2024 9:09:33 AM

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Dear NYC Council Members,

Please vote against the City of Yes. Although, those advocating for the proposal say that it will produce affordable housing, simply flooding the market with luxury and high end apartments will not solve the housing crisis. In my neighborhood, it will allow unscrupulous developers to take down every historic single or two family home on a 60x100 corner lot and replace it with 10 or more apartments. Beyond losing historic homes, this will also strain the infrastructure which is not adequately addressed in this proposal. You may say - "They won't take down every home. You're overreacting", but I live here and see how developers maximize every house that they build. If you change the zoning to allow for this growth, the neighborhood will be decimated in 5, 10, maybe 20 years. Every available corner will be a 10 unit or more building. The kicker will be that none of it will be affordable. Many developers, construction companies, and real estate agencies will be much richer. With the way our city government is looking these days, perhaps many of those we trusted and elected will be richer too?? The overarching benefits to those in the Real Estate industry have communities questioning if corruption is in play with this proposal. .

More than half of the community boards in NYC have voted unfavorably to the City of Yes. In Queens, 14 out of the 16 incredibly diverse community boards voted against it. Our Borough President, who is supposed to advocate for us, has supported the proposal. I will not vote for him and will urge others to do the same. In a democracy, the people need to be represented. The major changes of this proposal need community involvement, not just meetings informing the community about what is going to happen.

There are better and surer ways to achieve affordable housing, but they include community involvement and smaller plans that do not lump NYC into a one size fits all proposal. In other words, it will take hard work from all. Please vote against the City of Yes proposal.

Thank you,
Brita Kube
Queens, NY



BRONX BOROUGH PRESIDENT VANESSA L. GIBSON

Bronx Borough President Vanessa L. Gibson Public Testimony on the Zoning for Housing Opportunity at City Council Land Use - October 22, 2024

Thank you to Chair Riley and the members of the Zoning and Franchises Subcommittee for hearing my testimony today. I want to start by thanking the Department of City Planning Chair Dan Garodnick, the City Planning Commission, and the entire City of Yes team at City Planning for looking to address critical housing challenges that all New Yorkers face.

Our city is currently experiencing a housing crisis. Too many of our residents are unable to afford their rent or are at risk of eviction and displacement. The construction of new housing over time has not kept pace with rising rents that for many residents have reached unaffordable levels. The Zoning for Housing Opportunity proposal starts our city on a path to creating the housing necessary to bring down the cost of rent throughout our city.

In my full recommendation, I supported most of the proposal; however, I had some conditions with a few components in the proposal that require greater thought if they are to be implemented. I fully support the goal of creating “a little more housing in every neighborhood.” All communities in our city must do their fair share to create the housing we need. There is a narrative that you will hear a lot today, and it is that this proposal will be detrimental to lower-density neighborhoods, but that is not the reality.

The Town Center Zoning, Transit-Oriented Development, and District Fixes proposals will provide additional flexibility by allowing some additional height and additional units, but it is still within a very narrow range of one- to two-stories in most cases, which will not change the existing character of these neighborhoods. By focusing on areas within a half-mile of transit, this proposal will allow for additional density where it makes the most sense to ensure that everyone can get around the city without adding more cars to our already congested roads.

In order to support new housing development, the city also needs to ensure it is supporting existing residents by providing a modernization of infrastructure that will be needed as the city continues to grow. Balancing new development with support for existing neighborhoods is a common-sense approach.

I am in favor of the proposal to legalize the development of ADUs because providing smart housing options that allow flexibility is important. However, to safely allow this new unit type, the city must also provide additional DOB inspectors to protect residents’ safety and well-being. The City must engage with homeowners more on this issue, to ensure they all know what their rights and responsibilities are when it comes to ADUs.



BRONX BOROUGH PRESIDENT VANESSA L. GIBSON

When it comes to infill development, particularly on NYCHA campuses, the City must actively engage with residents and Tenant Association leadership to ensure that their concerns are taken into account. Infill development should have a focus on providing housing for working families, seniors, and veterans, particularly those who already live in NYCHA housing. We must ensure that NYCHA residents still have access to light, air, and green spaces, like every other resident of our city.

I do not support the proposals to increase small or shared housing and to decrease the Dwelling Unit Factor. The Bronx is already seeing an influx of smaller units in new developments and conversions to smaller units in existing buildings. Throughout my tenure as Borough President, I have consistently advocated for building more family-size units that consist of two or more bedrooms. We need larger units that work for families, not just single adults. While I understand that there is a demand for this type of living arrangement, The Bronx already sees too many units where too many people are living in too little space. This type of housing should not be the priority.

Furthermore, I also cannot support the removal of parking mandates. While this proposal may work in high-density areas with significant access to transit, it does not work for all neighborhoods – particularly ones that are transit deserts. We have several areas in The Bronx where car ownership is the only practical way to get around or where a long bus ride is required before a connection with a train or subway. There is already significant competition for parking in many of these neighborhoods, and this would get worse without the mandates. If this proposal were to move forward, it must be limited to areas within a half-mile of a train or subway station – areas where car ownership isn't a necessity.

In conclusion, I want to commend the Department of City Planning for their commitment in finding ways of streamlining the current zoning regulations while maintaining zoning's core intent to protect public health, safety, and general welfare.

I would invite you all to review my full recommendation which goes into detail on each of the topics and why this well-thought-out, balanced proposal makes sense to support. When everyone has stable housing, it is beneficial to all. We need to move forward and stop wasting time when families are struggling and in need of more housing options NOW!

Thank you,

Vanessa L. Gibson
Bronx Borough President



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>

ANTONIO REYNOSO
Borough President

JEFF SANOFF
Chairperson

EDDIE MARK
District Manager

October 24, 2024

landusetestimony@council.nyc.gov

Written testimony from Brooklyn Community Board 13:

At the June 26, 2024, meeting of Community Board 13 a vote was taken for City of Yes-Housing Opportunity.

Community Board 13 rejected City of Yes-Housing Opportunity.

Motion: Community Board 13 to reject City of Yes – Housing Opportunity

The vote was: In Favor: 40, Opposed: 1, No Vote: 2

Motion carried (quorum present)

Please find below Community Board 13 comments:

1. Community Board 13 represents the areas of Coney Island, Brighton Beach, West Brighton, Gravesend and Sea Gate. About 80% of the boundaries of Community Board 13 are in a flood zone where there are mandatory evacuation orders. We strongly believe that bringing more housing into this already overdeveloped (thousands of new units and thousands of new residents have recently been added to this area) and unprotected flood zone is dangerous. **The Coney Island/Brighton Beach peninsula MUST be excluded from City of Yes-Housing Opportunity proposal.**
2. The City does not have a comprehensive plan for infrastructure updates. Bringing more housing into the flood zone without major infrastructure upgrades puts current and future residents in danger.
3. The City of Yes-Housing Opportunity does not have any plans for increasing the number of school seats, medical services, social services, etc.
4. City of Yes-Housing Opportunity proposal is based on an EIS. Please see #11.
5. Even though City of Yes-Housing Opportunity aims to increase the number of affordable housing units (UAP), it does not include an adequate number of apartments to achieve this goal. The proposed percentage of affordable units in new developments will benefit developers only. The percentage of affordable units in new development that benefit from increased height and FAR should be

increased to a minimum of 30% and accommodate households with AIM of 40% instead of 60%.

6. The parking mandate for new buildings should not be lifted due to the lack of safe, reliable and accessible public transportation.
7. While we agree with the extended guideline for Residential Conversion, we strongly believe that small and shared housing programs resulting from the conversion of non-residential buildings should be designed as a “steppingstone” for shelter recipients and/or individuals with income below the poverty level. Such a program should have strict requirements regarding room size, number of individuals permitted in each room as well as guideline for requirements of permitted number of residents sharing kitchen, bathroom and other facilities.
8. Community Board 13 does not support a proposal of Town Center Zoning, Transit Oriented Development, Creating New Zoning Districts, as well as other parts of the City of Yes-Housing Opportunity, within flood zones with mandatory evacuation. Our community is already overdeveloped without any protection from natural disasters.
9. Campuses: Community Board 13 does not support this proposal. It will bring more traffic, removal of green spaces and overload infrastructure that is already out of date.
10. Accessory Dwelling Units (ADUs): While we understand that this proposal might benefit some homeowners as well as their families, we strongly believe that the proposed text does not specify the necessary requirements for such conversion and does not rule out the self-certification process, which is dangerous. We strongly oppose any conversion within flood zones with mandatory evacuation.
11. This is a blanket EIS. Although it mentions the possibility of additional EIS's, it looks like once the City of Yes is adopted, it will make it less likely that additional EIS will be required. Therefore, it will be difficult or impossible to address impacts as they arise.

The EIS only looks at what it calls “prototypical” areas. The closest “prototypical area” to our area is Sheepshead Bay. Our area is very, very different from anywhere in Sheepshead Bay.

The geography of Sheepshead Bay, Brighton Beach and Coney Island are very different from each other. The development is different. The infrastructure (water & sanitary/storm water lines) are different. Flooding issues are different. The demographics are different. It is impossible to use a “prototypical community” to determine the impacts on another community, especially shoreline communities.

City of Yes believes that the solution to decreased ground water infiltration from increased lot coverage is retention basins, bioswales, etc. But the water table throughout Brighton Beach and Coney Island is very, very high. During storm surge events, buildings flood not only from the street, but from hydrostatic pressure – the water table rises, and flooding comes up through their foundations. Some of the older stores on Brighton Beach have a “basement within a basement” to address existing groundwater incursion. A retention basin was installed under Asser Levy Park some years ago and it quickly filled with saltwater from the ground and was rendered useless. Coney Island has frequent episodes of “blue sky” flooding because storm water outfalls are below water at

certain points in the tidal cycle. The “solution” to this problem - raising the outfalls and installing pumping stations, will be outrageously expensive and will likely never happen. Because of the geography and infrastructure limitations, if we allow more construction with greater FAR and lot coverage, we reduce storm water infiltration and create more flooding problems.

“While components of the Proposed Action could result in an overall reduction of pervious surfaces throughout the city and an increase in stormwater flows, the existing stormwater conveyance system throughout the city is expected to accommodate the incremental stormwater flows generated by the Proposed Action. Therefore, the Proposed Action would not have a significant adverse effect to citywide stormwater flows.” City of Yes’s claim that the NYC sewer system has adequate capacity is ridiculous beyond words. If the wastewater treatment plants (WWTPs) had sufficient capacity, all stormwater would be treated before discharge. The existing storm water system “accommodates” excess stormwater by discharging raw sewage into every waterway around the city. Every time there is a heavy rain, the entire NYC sewage system is overwhelmed, and raw sewage pours into our waterways via combined sewer overflows (CSOs). The problem will only get worse as development increases.

While it may require some upgrades on sanitary/storm water pipes that service an individual project, City of Yes does not look at cumulative impacts to the wastewater treatment system. It gives some examples using average output for a specific plant (Tallman Island) but as we all know, rainfall in NYC is frequently setting new daily records. Increased rainfall results in more raw sewerage discharging into our waterways, because more ground is covered with impermeable surfaces and more stormwater goes into the system. Upgrading the wastewater treatment plants (WWTP’s) is not only difficult and very expensive, but it is not the only part of the solution.

To eliminate CSO events, every neighborhood that has combined sewer lines must have new, separate sanitary and storm water lines installed. There is no mention in City of Yes about separating sewer lines in areas where they are now combined.

Although water saving showerheads and have been mandated for years, combined sewer overflow has not diminished and CSO events are more frequent. Coney Island Creek has a huge CSO that comes from the Owl’s Head WWTP (Bay Ridge, Bath Beach etc.). More development means that more foul smelling sewage will pour into the water surrounding our area. The EIS does not address how development in one area can impact water quality in other areas. In shoreline recreational communities like Brighton and Coney Island, CSO discharges anywhere in NYC results in a greater likelihood that our beaches will be unsuitable for swimming. Decreased recreational water quality adversely impacts our seasonal economy.

The EIS bases their sewage capacity claims on the size of regulators and outfalls. But many of the sewer lines around here were designed for bungalows and they are very, very, small. So, if there is too much development along a small sewer line it backs up into homes before it gets to the big regulator.

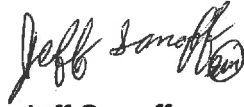
Our area is a MANDATORY evacuation zone. When a flood evacuation is declared, everyone must get out of the flood zone, including those who live in so called “resilient” buildings. If you live in a “resilient” building that has a generator you will be able to flush your toilet and (maybe) keep your refrigerator on. But

those residents will be in the same disaster as everyone who lives in the "non-resilient buildings": No bank, pharmacy, safe food supply or transportation and no way to get in or out because of impassable streets clogged with debris. Furthermore, there is only a minimal amount of space in hurricane shelters. There are roughly 100,000 people living in the 11224/11235 zip codes. If half find shelter on their own, that leaves roughly 50,000 people – and their pets - from southern Brooklyn that need mandatory hurricane shelter. We don't have a fraction of that capacity. By increasing development in flood zones, the City of Yes will put more people in the path of destruction. What is really needed is a moratorium on development in flood zones.

Sincerely,



Eddie Mark
District Manager



Jeff Sanoff
Chairperson

[EXTERNAL] Brief statement of support for City of Yes Land Use Changes

Bryan K. <

Wed 10/23/2024 2:11 PM

To: Land Use Testimony <landusetestimony@council.nyc.gov>;

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To the New York City Council:

I'm a 29-year old resident of Washington Heights, having lived in New York for 11 years. I moved here for college and have no doubt this city will be my home forever. I'm an urban planner because of how materially better this city has made my life compared to the suburbs I grew up in.

I'm fortunate to have income that supports a market-rate apartment, but the prospect of ever owning a space here is simply not in my mind. That shouldn't be the case for me or anyone else in my situation. In combination with state-wide reforms on housing, the City must continue to build dense housing near transit, including locations that might traditionally not be dense. We need housing for New Yorkers today and New Yorkers of the future.

Bryan

[EXTERNAL] Fw: VOTE NO!!!! To the city of Yes!!



Mon 10/21/2024 7:14 PM

To: Land Use Testimony <landusetestimony@council.nyc.gov>;

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Dear Council Members:

I am writing on behalf of myself, my family and as a Board Member of the Neponsit Property Owners Association, Queens, NY. We are all adamantly opposed to the City of Yes. If approved, this will destroy the fabric of all of our diverse, small communities. We have numerous concerns regarding the negative impact this Bill will have if it is approved.

Over Development: The proposal will lead to over development, straining infrastructure such as schools, public transportation, sanitation, parking, EMS, police and fire protection. These agencies are already over burdened and do not have adequate personnel to handle their current work load. Approval of this Bill will greatly exacerbate these shortcomings.

Community Character: The proposal will irreversibly and drastically alter the distinct characteristics of our neighborhoods.. It will undermine and change the unique cultural and historical aspects of our city's diverse communities. It will also adversely affect property values and have a negative tax impact.

Affordability Impact: There is no guarantee that the proposed new housing units will actually be affordable for current residents and new residents. This can also lead to the displacement of current lower-income residents forcing them out of the neighborhoods they live in and raised their families in.

The Need: In the past decade New York City has lost a substantial amount of its population. As a matter of fact, in the past five years, New York has seen the largest exodus of any state in the country. Hence, the need for additional development is not necessary and certainly not justified.

Environmental Concerns: Increased construction will lead to environmental issues.

These include a reduction in green spaces leading to an increased carbon footprint which effects global warming. Also, higher pollution levels which will negatively impact the health and quality of life of residents.

Based upon the above stated facts the City of Yes should be a DEFINITE NO!

Sincerely,
Butch and Joanne Brandes
Board Members of NPOA
(Neponsit Property Owner's Association)

[EXTERNAL] Yes to Congestion Pricing, No to Parking Minimums

Caitlin Curtin <>

Wed 10/23/2024 12:49 PM

To: Land Use Testimony <landusetestimony@council.nyc.gov>;

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I and my mom & daughter have lived in NYC and owned our little co-op apartment since 1987. While not all of us have lived here full time for all of those years — my daughter who went to PS59 went away for college, for example — we have seen a lot of recent NYC history.

What we need to be a truly world class modern city:

- No parking minimums — we are transit rich now — and should be investing more in transit (congestion pricing now!)
- more car storage = more cars = more public health damage due to pollution & increased carbon emissions
- we need to be able to use our developable lots for housing, having parking minimums reduces the housing potential of a site & increases costs.

This isn't rocket science.

TY,

Caitlin Curtin & family



NY NY 10022

From: [Calder Orr](#)
To: [Land Use Testimony](#)
Subject: [EXTERNAL] Written Testimony on City of Yes
Date: Friday, October 25, 2024 7:50:58 AM

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Thank you for receiving my testimony.

Housing is an issue for the City but this is not the answer. At least not in a large package with so many loose ends and potential negative impacts. The City has to address lack of ability of people to own homes via coop and condos construction and conversion. Vacant rentals, investors buying up homes, and other issues that decrease availability and increase cost will only continue if not addressed. This proposal does not address these issues so you will only end up with more overpriced rentals and at what cost?

Two major environmental impacts that are not weighed are the loss of green space and increase load on City sewers. 30% of the city's tree canopy is on private land. This proposals does nothing to mitigate or offset these impacts. Additionally, there is no planning for increase on public services such as police, fire, schools, parking and transit. In fact it bypasses all of this. The planning commissions study noted that projects would have made it through environmental review anyway. Why? Because developers know what to include and what will go through environmental review. You take that away and they will remove all the thought, planning and design elements that they had to include before. There is a reason developers love this and it's not because it will lower their per unit rent revenue or sales prices. If you take away the environmental review process you have to improve, probably should anyway, all the requirements to account for all the aforementioned ancillary impacts of adding more housing.

Look at the disastrous impacts of the 3893 Waldo building in the Bronx that took advantage of quality housing provisions to build on a non-traditional lot without any review. The building cause erosion issues into the adjacent park, impacted storm sewers, black sun from the park lawn for significant parts of the year, impacted traffic flow, and is now costing the city to correct the issues. We need more planning, not less.

From: [Camille Alma](#)
To: [Land Use Testimony](#)
Subject: [EXTERNAL] CITY OF YES
Date: Friday, October 25, 2024 8:41:25 AM

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Dear City Council,

I urge you to vote NO on City of Yes.

Thank you for the opportunity to provide input on the City of Yes for Housing Opportunity proposals. We recognize that the economic realities of the past few decades, coupled with current city policies, have worsened the shortage of affordable housing. Unfortunately, these proposals represent a blunt instrument that does not consider the diverse needs of our city's communities. For this reason, the Bellcourt Civic Association, a neighborhood of early 20th-century homes representing some 500 households in the heart of Bayside, Queens, stands firmly against the City of Yes Housing proposals. Here are just a few of our objections:

Transit-Oriented Development: Our neighborhood, close to Bayside LIRR station, sits within the Greater Transit-Oriented Development Area. While the blocks adjacent to the tracks already accommodate multifamily housing, Bellcourt is primarily zoned for one-family homes, with a typical lot size of 40 X 100 feet. The push for development near transit would rapidly change the character of this neighborhood, increasing density without enhancing the necessary supporting infrastructure. Depending on how the proposal is interpreted, it may permit the construction of large apartment buildings on some lots in the neighborhood, which would further exacerbate crowding, parking, and stress on infrastructure.

Parking: Eliminating the parking mandate in new construction makes no sense in Northeast Queens and other communities throughout the five boroughs that are beyond reach of the subway. It is disingenuous to pretend residents of these neighborhoods don't need cars—whatever the vision for the next century may be, residents here today rely on cars for work, shopping, commuting, and daily errands. There are no commercial garages—our choices are driveways or the street. As we are located near a train station, weekday parking is extremely dense. Homeowners already illegally pave over lawns and yards to accommodate their cars, worsening water drainage during storms. Parking is a necessity, particularly as neighborhoods become more densely populated.

ADUs: These are often presented as solutions for housing aging parents or providing starter units for young families. While we agree that both populations need housing, we don't agree that adding disruptive and dangerous ADUs on small lots in less-dense areas is the answer. Allowing ADUs on tiny NYC lots eliminates much-needed green space, overcrowds neighborhoods that are not equipped to handle a doubling in population, and effectively eliminates single-family zoning. And legalizing existing basement apartments, particularly in light of increasing storm frequency and flooding, is foolhardy.

Increased FAR: Houses in our neighborhood are already pushing the envelope on size. Many are illegal and therefore unregulated two-families. None of this new construction has done anything to improve affordability. In fact, house prices are skyrocketing. Allowing larger homes in single-family districts will simply lead to larger, more expensive homes, doing absolutely nothing for the affordable housing crunch.

We can say with great surety that the current zoning proposals in the City of Yes will wreak havoc on our neighborhoods and as such are deemed entirely unacceptable by our community

Respectfully
Camille Alma

From: [Candace Tovar](#)
To: [Land Use Testimony](#)
Subject: [EXTERNAL] land use testimony
Date: Friday, October 25, 2024 10:16:01 PM

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Dear council members,

I would like to express my agreement with and desire to be added to the testimony of my neighbor, Joel A. Siegel, Esq. for consideration. Thank you

Candace Tovar

[REDACTED]

Brooklyn, N.Y.

From: [C](#)
To: [Land Use Testimony](#)
Subject: [EXTERNAL] City of Yes Housing
Date: Wednesday, October 23, 2024 8:19:48 AM

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NO to City of Yes . SAVE OUR INDIVIDUAL ZONING BY COMMUNITY. Keep the American single family home dream alive.
Carel Doran
Resident of Bronx, District 13

[EXTERNAL] City of Yes Housing

Carina Nieves <

Mon 10/21/2024 7:36 PM

To: Land Use Testimony <landusetestimony@council.nyc.gov>;

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Good day City Council,

I write to express strong concerns regarding Mayor Adams' "City of Yes for Housing Opportunity" (COYHO) proposal. As the proposal comes up for a vote with City Council, I strongly urge you to vote no on this large land use zoning code change. I have linked some articles for reference. Thanks for your time and hearing my concerns about this matter!

The housing proposal from City of Yes won't make our city more affordable. The one thing that makes our city so expensive is the taxes. The only reason why Queens had pockets of affordable rental properties is because of the fact of lower density 1-3 family housing were able to offer affordable rents. During COVID many of these homeowners were affected by people not paying their rent and had to cough up the money themselves. Recent data shows Queens has the highest foreclosures in 2023 and the first quarter of 2024. Homeowners are making hard decisions to stay afloat and like any real estate owner have to pass on the costs higher property taxes and utility bills to tenants thus increasing rent.

Some may be reluctant to rent, which is why AirBNB was an alternative income for 1-2 family homeowners. There is a new group called RHOAR NYC advocating for rolling back LL18 to allow homeowners to use short term rental as a means of additional supplemental income to stay afloat in their homes!

Currently, there are already homes that have illegal ADU's, but basements should not be the answer. There are many safety concerns and it will be costly to homeowners to do the required updates. FDNY has had to deal with emergency situations in recent years that have led to casualties like Ida. A man who recently died in September here in Richmond Hill from a fire that occurred in the

basement. If a property has the space to have an ADU it should be done as a case by case basis approved by community board with all appropriate city agencies.

<https://qns.com/2024/09/south-richmond-hill-senior-killed-fire-illegal-basement-apartment/>

The discussions City Planning and others have been having that lower density zones is the reason why we don't have more housing is ridiculous. NYC has lost population even with the influx of new arrivals, meaning there should technically be more housing available. Reports have shown that some big properties were "warehousing apartments" especially those that were almost up for being off the state mandated affordable housing list. From 2019 to 2022, the city lost 120,000 rent regulated apartments. The city keeps increasing the rent on these units leading to many eventually becoming made into market rate. Preserving these affordable units should be the focus. I support the state allowing office space to be converted into residential units especially in Manhattan. It has lost many residents and has the density already built up to support more people compared to areas of Queens and the other outer boroughs.

Community Board 9 worked hard to preserve lower density zones back in 2009 after many 1-2 family homes were being demolished and being rebuilt into 3-4 family properties. The zone along Jamaica Avenue and Atlantic Avenue were upzoned for up to 7 stories. Along Jamaica Avenue only one large Senior housing was built since the rezoning. There was one property on Jamaica Avenue that has been sitting vacant for close to a decade due to DOB not working with the property owner due to allow a variance on the property. On Atlantic Avenue only two properties were built. In Kew Gardens, there has been multiple homes that are on the border of higher density zoning that were knocked down and rebuilt as apartments. These new apartment prices are unaffordable for people living in the area. We have seen a failed approach to the new housing units built being not affordable for the people in the community across our city.

The lower density commercial districts in other neighborhoods should be allowed to build higher, but we must recognize that these lower density properties have allowed small businesses to bloom due to lower property taxes passed down to lower rents onto businesses. NYC is losing small businesses due to rising rents, thus leading to the problem of having many vacant storefronts in commercial zones.

Lastly, I feel our city won't be ready to take on this massive zoning

changes. Currently, we don't have enough staff at DOB, FDNY, HPD and more to ensure the our city is safe right now. This plan will only exacerbate this problem. Taking away the oversight powers from our elected leaders and community boards isn't the answer!

Rent Controlled Apartments:

<https://citylimits.org/2024/04/09/staring-down-the-wrecking-ball-these-brooklyn-grandmothers-wont-be-moved/>

<https://www.thecity.nyc/2022/12/23/rent-regulated-apartments-registration-missing/>

<https://gothamist.com/news/how-many-nyc-apartments-are-vacant-no-one-actually-knows>

<https://www.businessinsider.com/why-cant-find-affordable-nyc-rent-controlled-regulated-vacant-apartments-2022-7>

Prior City Rezonings shortcomings:

https://www.villagepreservation.org/campaign-update/is-a-housing-shortage-really-the-cause-of-unaffordability/?utm_campaign=later-linkinbio-gvshp_nyc&utm_content=later-43026549&utm_medium=social&utm_source=linkin.bio

Foreclosures:

<https://qns.com/2024/04/queens-most-foreclosures-among-nyc-boroughs-first-quarter-2024-report/>

<https://qns.com/2024/01/queens-most-foreclosures-nyc-boroughs-2023-report/>

COYHO would increase the allowable size and height of purely market rate residential developments in various contextual zoning districts.

This doesn't seem like we will have affordable housing if this is just creating housing for wealthy folks! Currently, if someone wants to build higher with bigger density they are required to allocate 10-20% of the apartments in the building to the affordable prices.

COYHO would remove important provisions from special districts throughout the city

that “duplicate” provisions COYHO would add to the citywide text, supposedly to avoid “redundancy,” leaving them vulnerable to losing these protections altogether in the future.

Our community after many years of organizing had gotten a historic zone for Richmond Hill to preserve our history. City Landmarks Commission has failed to protect historic homes in our area and we have lost many.

Both collectively and individually, these provisions have the potential to do great harm within Queens communities that want to keep their suburban feel. It will spur out-of-scale and out-of-context development, force small businesses out and increasing the amount of unaffordable, luxury housing development in both areas. I strongly urge you to reject this plan and allow zoning to be locally organized by community board.

Sincerely,
Carina Nieves
Long time Resident
Richmond Hill, Queens

[EXTERNAL] housing

CARLA LORD <>

Fri 10/25/2024 10:53 PM

To: Land Use Testimony <landusetestimony@council.nyc.gov>;

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NIMBY is my problem. My backyard is Central Park. My front yard has three supertalls. What is light? What is air? In the last rezoning they were considered. Now no longer. If New York is going to have any character, then keep most low rise neighborhoods in tact, along with the neighbors. My supertalls have few inhabitants, for their apartments are piers a terre. New housing must be completely affordable and let the super rich non inhabitants move to a growing Dubai.

Best,

Carla Lord



New York, NY 10019

Sent from my iPad

[EXTERNAL] The city of yes

Carmela Baggio < >

Fri 10/25/2024 6:30 PM

To: Land Use Testimony <landusetestimony@council.nyc.gov>;

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To Whom it May Concern:

The City of Yes plan, a 1 glove fits all agenda, is a poor fit for our community. This proposal will put additional burden on already overwhelmed infrastructure in flood prone areas. Place stress on already overcrowded and many underperforming schools. In most situations increased population and density will jeopardize public safety. Our police force, fire department, EMS, health and human services cannot withstand additional work loads. This aggressive plan will remove parking mandates for new development projects. Our car-centric, low density R 1 - R 5 neighborhoods are already parking deprived. A housing crisis is the alleged reason for this over reaching plan. However, allowance of tens of thousands of new entrants to our city while there is a crisis is akin to strategically placing additional holes in a sinking ship. New York City cannot maintain their sidewalks Over 9,000 sidewalks damaged by tree roots await repair. The repair wait list exceeds 5 years. New York City please fix what you have before adding more. Go back to the drawing board and do a district by district assessment. Determine which fingers properly fit the gloves and bring a modified product back to the respective council members and their constituents for approval. Force feeding creates a gag reflex. This plan in its current state is not digestible for many New Yorkers. Thank you in advance for your anticipated cooperation.

Carmela Baggio-Vazquez
Bronx, NY

[EXTERNAL] IMPORTANT

carmela muccio <>

Fri 10/25/2024 10:55 PM

To: Land Use Testimony <landusetestimony@council.nyc.gov>;

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Carmela Muccio


BronxNY 10465

[Yahoo Mail: Search, Organize, Conquer](#)

Carnegie Hill Neighbors Recommended Changes for Zoning Proposal
COY-HO (City of Yes – Housing Opportunities) Presented by Lo van der Valk, President
(10/22/2024; update to 10/6/2024)

Below are CHN's Six Main Objections to the above proposed revision of the NYC Zoning Law and suggested changes. Item #3 suggests an alternative by CHN to the proposed revisions of R8B (the low-scale zoning that governs the mid-blocks of the narrow side streets in Carnegie Hill and almost all of the UES.)

1. The Madison Avenue Special Preservation District (created in 1973): The proposed text removes most of the custom bulk requirements of the Special District. We wish to preserve the most salient feature of the special district that affects bulk and massing. Specifically, we are seeking to keep the current requirement for successive setbacks for the last 40 feet of building height, which results in a pyramid-like shape for the top floors. This shape is unique to this special district and has resulted in very attractive buildings that enhance the character of Madison Avenue (two recent additions were designed by Robert A. M. Stern, 1165 and 1230 Madison Avenue). We believe it is possible that this unique provision might have been inspired by the shape of the upper floors of the Carlyle Hotel at 76th Street and Madison Avenue.

Madison Avenue is the premiere shopping avenue of New York City and recognized as such throughout the world. We feel this pyramid-top provision can be kept in the new revision without creating unnecessary hardship. We are working on a suggested text that resolves certain ambiguities that exist in the current version, and we hope you can agree to this and help to preserve this unique quality of Madison Avenue.

2. The proposed height increases for the narrow street mid-blocks: These apply mainly to the contextual R8B mid-block zoning, whose allowed height limit of 75 feet will be raised to 105 feet if affordable housing is provided under the Universal Affordability Preference (UAP). This is a 40% height increase, but UAP provides only a 20% increase in FAR. The increase in height is excessive and unnecessary to accommodate the additional FAR for affordable housing. Other districts see height and FAR increases proposed for affordable housing in proportion to each other, but for the R8B districts there is an imbalance (20% increase for FAR versus 40% for height). We strongly prefer no increase in the height limit, but if no agreement can be reached the increase in the height should stay in proportion to the increase in FAR, hence 20% (or 90 feet; not 105 feet).

A major understanding going back more than 100 years is: the avenues can be tall, but the midblocks must be short. This basic formula allows for high density, and yet maintains human scale. We should not encourage a departure from this principle.

3. The proposed reduction of required rear yards from 30 to 20 feet: Reducing the size of required rear yards is a major change to our housing standards and will result in less light and air for both new and existing residents. Combined with additional height increases (cited above), we feel that this loss is unacceptable.

A note on the divergent historic development of the mid-blocks in the Upper East Side and especially in the Carnegie Hill/Yorkville area where Third Avenue forms a dividing line both in terms of height and rear yard dimensions: While we need to be cautious of generalizations, we note that east of Third Avenue the blocks are long (ca 600 feet) and have a strong presence of tenements, often 5-stories with short rearyards (often only 10 to 15 feet deep). West of Third Avenue, on the other hand, the blocks were made shorter (close to 400 feet) brought about by the insertion of Madison and Lexington Avenues. Here the presence of tenements is less, and brownstones are more prevalent and lower in height (often only 3 or 4 stories) with larger rear yards (and yards in excess of 30 feet are not unusual).

Yet the same R8B zoning applies for both areas, east and west of Third Avenue. If R8B is effectively (through zoning text amendments) allowed to be changed in a way that increases its density (taller with smaller and more

congested rearyards, as covered here in points #2, #3, and #4), the changes contemplated are less appropriate for the shorter R8B midblocks west of Third Avenue, and therefore for those shorter blocks the R8B zoning should not be changed. It may be no accident that the excessive expansion of the Blood Center and the recently approved very tall residential tower at 94th Street between Third and Second Avenues are both east of Third Avenue.

4. The further diminishment of rear yard open space: In addition to shrinking the rear yard, the proposed zoning permits new additions to be built in the rear yard. This includes accessory dwelling units (behind one and two family homes), or accessory residential space (not for dwelling units, but gyms, mail rooms, etc.) that can cover the entire rear yard behind a multiple dwelling. We don't believe there are many townhouses that could use an accessory dwelling unit in Carnegie Hill (separate entrances would be required), but there are many multiple dwellings that could fill in their rear yard up to a height of 15 feet, which is an unnecessary attack on the quality of the rear yards. The proposed zoning would not permit this space to be used for dwelling purposes, and so these additions would not benefit the housing crisis. It just diminishes the rear yard character and the valued open, and ideally, green space. Such infills may satisfy the wishes of some owners and potential tenants in the mostly low-scale outer boroughs. But for the highly dense Upper East Side they are anathema for quality of life.

5. New City Planning Commission Authorizations: The newly proposed zoning contains several new expansions of City Planning Commission (CPC) authorizations, most of which should not be approved in their current form. CPC authorizations grant the City Planning Commission the authority to permit applicants to break our zoning laws, without any public hearing. While authorizations are referred to the Community Board, they are not approved by City Council. As a matter of governance CPC authorizations should be extremely limited. Instead, one new authorization (Section 75-25) would permit the CPC to approve 20% increases in FAR and 25% increases in height to any non-complying building built before 1990. That's most of Carnegie Hill! This authorization is a serious and blatant overreach of CPC authority and should be stricken entirely along with Section 75-24, which provides the CPC the same authority for parcels with "practical difficulties." At minimum, these authorizations should be converted into special permits, which would require a public hearing, and City Council consent. But the worst of these such as 75-24 and 75-25, should be deleted entirely.

6. Landmark Transfer Development Right (TDRs): This provision will vastly expand the reach of receiving lots. The blocks where receiving lots could qualify will expand from the current 2 or 3 blocks to potentially 8 blocks. Moreover, when taking into account zoning mergers, the expansion of receiving sights could be far larger than indicated in some Department of City Planning maps produced for illustrative purposes. While some expansion would be appropriate, the formula advanced is potentially far too expansive. Also, this is an illustration of what we feel is the inappropriate use of CPC authorizations (see item #5 above) which would allow these transfers and for which public (Community Board) and City Council reviews will no longer be required.

From: [Carol Fitzpatrick](#)
To: [Land Use Testimony](#)
Subject: [EXTERNAL] City of yes
Date: Wednesday, October 23, 2024 6:38:50 PM

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NO to the City of Yes, preserve City Island's Special District Zoning
Carol & Richard Fitzpatrick, City Island Residents

From: [Carol Fitzpatrick](#)
To: [Land Use Testimony](#)
Subject: [EXTERNAL] City of Yes
Date: Wednesday, October 9, 2024 4:11:30 PM

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A resident of City Island, my Husband and I have resided here for over 50 years. Over the years have seen a big change on this small Island. First the loss of many marinas, turned into condos, increasing the population, more people more cars, increased advertising, has led to a tremendous amount of traffic and noise to this area during summer months. So we are very much opposed to a one plan fits all for all neighborhoods, it is irresponsible, we have only one small school, a small Fire Department, and very little protection from police, and tightening parking, a lot of these homes don't have driveway's.

Now will address the big elephant in the room, in light of Federal Charges brought against Mayor Adam's, until they prove he is innocent, wonder how many developers, are deserving of doing any business for the City of New York.

This plan will absolutely destroy every not just this small community, but every small community in all five boroughs.

Sincerely Carol & Rick Fitzpatrick

[EXTERNAL] City of Yes

Carol Marian <[REDACTED]>

Fri 10/25/2024 3:27 PM

To: Land Use Testimony <landusetestimony@council.nyc.gov>;

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Vote **No to the City of Yes**. I am a resident of NYC [REDACTED] Bayside. Living in Bayside since **1966**

This proposal has not been created in a democratic way. 12 out of 14 Community Boards in Queens have voted NO after much testimony by residents. And yet the Borough President is supporting it.

The people of Queens have spoken and the Elected Borough President is not listening. The proposal is a radical and extreme zoning change for the entire city. The City Council should respect the residents of Queens and Staten Island. A zoning document of over 1,400 pages should have been created with community input.

To have the local neighborhoods change so drastically because the City Councilmen have the final say is not an example of democracy.

The existing zoning in NE. Queens allows for a very large increase in density along Northern Blvd., Bell Blvd and other main streets.

City Council should vote NO and then work within their districts in a common sense way to address housing.

We are all paying attention to who is voting yes and in many cases those electeds are getting lots of financial support from the Developers and Builders who are supporting this very bad proposal.

Vote NO to City of Yes

Carol Marian

[REDACTED]
Bayside, NY

From: [Carolanne Clem](#)
To: [Land Use Testimony](#)
Subject: [EXTERNAL] City of Yes
Date: Friday, October 25, 2024 9:14:12 AM

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NO. Please save beautiful bayside

Sent from my iPhone

[EXTERNAL] Testimony in favor of City of Yes and eliminating parking mandates

Caroline Sheehan <



Fri 10/25/2024 3:09 PM

To: Land Use Testimony <landusetestimony@council.nyc.gov>;

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My name is Caroline Sheehan. I'm a 15-year resident of Brooklyn, current constituent in CD 39, and mom to two amazing kids named Daniel (age 5) and Emi (age 1). I'm testifying in support of City of Yes.

New York City has so much to offer its children: stellar schools, cultural diversity, and educational or life experiences they can't find anywhere else. It's one of many reasons why I think it's better to raise them here instead of the suburbs or other cities. But we are only able to do so at the mercy of our landlord. The housing shortage, especially for 2+ bedroom homes, means that buying a home is out of the question and a large rent hike would force us to leave the city. Building more non-luxury housing keeps families rooted here, ready to take advantage of the rich educational and cultural resources the city has to offer. At least one City of Yes opponent, Vickie Paladino, tried to argue in the hearing on 10/22/2024 that her opinion mattered more because she was born and raised in New York. By her logic, we value born and bred New Yorkers-- and therefore should endeavor to make more affordable housing for families!

Beyond that, I support City of Yes, and specifically the lifting of parking mandates, because it maximizes one of the other essential life experiences NYC gives its kids: independence. When I walk around our neighborhood with my children, we frequently deal with drivers who run stop signs and red lights, park in the crosswalk, or otherwise endanger us. Multiple children have been fatally struck by cars in the city-- even while obeying pedestrian rules and walking with their parents. Parking mandates are part of the cycle of car dependence that was discussed in the 10/22 hearing, contributing to the preponderance of cars in NYC. The number of cars on streets nowadays, combined with the increasing size of vehicles, is a threat to resident safety. At this rate, no matter how cautious and careful my children are, they cannot safely walk around without a grownup until high school-- there are too many drivers who cannot see them or are not paying attention while driving. This is a more common safety issue than kidnapping, and we have the policy power to stop it. And we should do so, because kids need to exercise independence-- especially in a place like NYC, where public transit can take them so far before they're old enough to drive. Research increasingly shows that children nowadays are more anxious, and that giving them more independence helps to manage their anxiety. For the physical and mental wellbeing of our children-- and all New Yorkers!-- we should pass legislation that calms and reduces traffic, and concurrently boosts public transit.

In conclusion, City of Yes will help the next generation of New Yorkers, and I'm in support of the legislation, especially lifting parking mandates. Thank you for considering this testimony.

Caroline Sheehan

Brooklyn NY 11218

[EXTERNAL] Forest Hills supports removal of parking mandates -City of Yes

Casey Martinez <[REDACTED]>

Wed 10/23/2024 11:32 AM

To: Land Use Testimony <landusetestimony@council.nyc.gov>;

Cc: Cassandra Martinez [REDACTED]

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Hello

I am emailing to support removal of parking mandates. I'm a long time resident of Forest Hills Queens, my family has lived here for 53 years - 3 generations. I am also a car owner.

Forest Hills is a small but desirable neighborhood. I have witnessed myself the increasing density of cars. Including an increase of neighbors with multiple cars parked on the street. It is very unpleasant to drive to a store even that provides parking and don't get me started about the amount of cars on Austin Street. Too much competition for too few spaces. I learned a long time ago to walk with my wagon to go shopping.

We need to realize and acknowledge that cars are no longer working in Forest Hills. Removing parking mandates pushes the needle forward to evolving to a neighborhood designed for living without a car. Which the majority has already been doing.

In closing, I will use the analogy of being in my fifties. If I want to stay healthy and trim, I have to change the way I've been living. I can't eat like I use to, I can't ignore exercise like I used to. I have to accept change to stay alive and healthy.

Thank you,
Cassandra Martinez
Forest Hills, Queens

Forest Hills supports removal of parking mandates -City of Yes

10/22/24

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Thank you,
Cassandra Martinez
Forest Hills, Queens

From: [Catherine Aks](#)
To: [Land Use Testimony](#)
Subject: [EXTERNAL] Against COY
Date: Friday, October 25, 2024 10:42:36 AM
Attachments: [Written Testimony by Joel A. Siegel, Esq., in Opposition to City of Yes-1.pdf](#)

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Hello.

I write in support of my neighbor Joel A. Siegel, Esq., who today is submitting a well-thought-out explanation (attached here) opposing the implementation of The City of Yes. I urge you to reject this ill-conceived plan.

I trust you will read Joel's analysis with clear eyes and thoughtful examination, and will come to agree with me, Joel, and the many many residents of our lovely Victorian neighborhood, a neighborhood that should be preserved for future generations as it was for us.

Please do not approve, and vote "No".

Respectfully,
Catherine Aks

JOEL A. SIEGEL
ATTORNEY-AT-LAW

October 24, 2024

By Email

Subcommittee on Zoning
New York City Council
City Hall Park
New York, New York 10007

RE: OPPOSITION TO CITY OF YES "HOUSING OPPORTUNITIES"

Dear Council Members:

I am a resident of Victorian Flatbush in Brooklyn, and have been practicing law in New York for almost 40 years, including a wide variety of real estate matters. I write in opposition to the Housing Opportunities components of City of Yes ("COY"), specifically Transit Oriented Development, District Fixes, and Accessory Dwelling Units. I note that while I am a member of Community Board 14 ("CB14") in Brooklyn, I write now on my own behalf.

In support of my opposition, I have included herewith:

1. My opinion piece on Housing Opportunities;
2. My letter to the Department of City Planning ("DCP"), dated July 2, 2024; and,
3. Photographs (before and after) of a Victorian Flatbush corner, illustrating the inevitable result of some of the most objectionable aspects of Transit Oriented Development.

There is one overriding point I want to make to you and your fellow Council Members copied with this letter. There is absolutely no need to rush to judgment on this massive overhaul of the 60-year old Zoning Resolution. There is no need to cram COY down the throats of the people you serve.¹ Other than the developers (with their lobbyists) licking their lips in anticipation of an enormous windfall, there is nothing that prevents you from putting the brakes on the objectionable components of COY, and directing DCP to engage in meaningful community engagement to reach a consensus for more housing. The unnecessarily draconian and

¹ While in his testimony to you, Brooklyn Borough President Antonio Reynoso expressed support for COY, he unambiguously indicated he supported COY because it was expedient, and he specifically used the word "cram" when characterizing how COY is being pushed through the City Council. Simply, that is no way to enact a zoning plan that may last decades.

misguided aspects of COY are readily apparent (and shown below), and you heard testimony from lawmakers and NYC residents to this effect on October 21-22. COY is as contentious a piece of legislation as you will meet, and DCP did little to prevent the matter from coming to the boil you now face. DCP wants you to clean up their mess. I ask you to resist the pressure to gratuitously inflict harm on NYC homeowners, and to instead do the right thing. Send Housing Opportunities back to DCP, and compel them to work with communities for a plan that most everyone can support. Make DCP do the hard work they have so clearly failed to do.

2009 Flatbush Rezoning

Over the course of more than three years, members of the Victorian Flatbush community participated in the 2009 Flatbush Rezoning ("2009FR"). The 2009FR was a long-term plan resulting from meaningful engagement by all sectors of our community (including CB14). As a result, residential streets in Victorian Flatbush were preserved by rezoning to R3X, and our commercial corridors were upzoned, leading to the current unprecedented boom in building of dwelling units along our commercial streets. The 2009FR was the product of people of good will coming together to meet the challenge for more housing. It entailed a lot of hard work by many (including DCP) and compromise by all, in order to create more housing. As you know, DCP Chairman Daniel Garodnick has recently and repeatedly criticized various neighborhoods for a lack of new dwelling units. But he has not and cannot criticize the people of Victorian Flatbush or the other neighborhoods who, long before COY, took it upon themselves to work for more housing. Since the 2009FR was enacted, several thousand dwelling units have been added in Victorian Flatbush, and several thousand more are headed to completion.

Unfortunately, various Housing Opportunity provisions fundamentally undermine the work the residents of Victorian Flatbush did with DCP for the 2009FR. Up until now, Victorian Flatbush residents reasonably relied that the 2009FR was permanent. COY is a kick in the teeth. It is a betrayal, and it sends a clear message to Victorian Flatbush that DCP cannot be trusted. Specifically, if enacted, the Transit Oriented Development, District Fixes and Accessory Dwelling Units provisions of COY would spell the end of large swaths of Victorian Flatbush, an area that has been preserved by my neighbors and their predecessors for over 120 years. Beautiful homes protected by the 2009FR would be torn down for luxury apartment buildings because COY takes a sledgehammer one-size-fits-all approach, without any concern for our neighborhood and other neighborhoods throughout NYC. You should be profoundly offended that DCP has asked you to endorse their betrayal of our community. And you should just say NO.

There is no reason why every neighborhood throughout NYC cannot do what we did, or at least be afforded the opportunity to do so, and no reason why DCP should not be compelled to work with every neighborhood to achieve what we did. DCP needs to be told in no uncertain terms that they must do this. They must be told that they must try to build consensus. And if you fail to force them to do this, you will have failed in your responsibility to NYC residents to do what is just, moral and fair.

In my accompanying opinion piece, I point out that tens of thousands of NYC homeowners will lose a billion dollars in equity under Housing Opportunities, and that these homeowners' nest eggs -- life savings -- will effectively and cavalierly be given over to developers. This is a

staggering and breathtaking fact. These homeowners, like me, worked decades for their equity. Is this what it now means to be politically "progressive"? To me, it shows a profound lack of conscience. It should to you as well.


As you well know, if you want more "affordable" housing, you need to build more and better maintained NYCHA housing, Mitchell-Lama housing, and Nehemiah projects. It is unconscionable to try to cure NYC's housing problems on the backs of arbitrarily selected homeowners, which is what COY does.

There is no need for me to repeat the articulate testimony of others who came before you this week in opposition to COY, nor to repeat the matters included in the documents accompanying this opposition. Further, others in my community have submitted to you written testimony detailing and analyzing the technical zoning provisions of Housing Opportunities, to help you better understand the inherent problems in DCP's fundamentally flawed plan. But I want to highlight a few further points:

- 1) As many testified before you this week, there was minimal thought given to environmental and infrastructure impacts of COY, including sewage and drainage. In this regard, and at best, Housing Opportunities is a crapshoot.
- 2) As you know, many Council Members are former members of community boards. COY effectively ends community board influence on land use matters. Everything becomes as of right for developers. There can be no question this is wholly inappropriate. And the fact that the vast majority of community boards have voted against COY cannot and should not be ignored.
- 3) Many people testified to you, particularly young people, that they want rents to go down. But as you well know, the principal of supply and demand from Economics 101 does not apply in New York City for a myriad of reasons. One of those reasons is the fact that developers do not build to lower rents. They really don't. They build to make as much money as possible. Further, Housing Opportunities contains minimal incentive for "affordable" housing. The bottom line is rents are not going down. They never have and they won't under COY.

Please, please, step back from the brink. Do the right thing. Have a conscience. Find your backbone. Tell DCP to follow the blueprint they followed with the 2009FR. Work with communities. Reject Housing Opportunities.

Thank you.

Sincerely,

Joel A. Siegel

cc: All NYC Council Members (*by email*)

**OPINION PIECE BY JOEL A. SIEGEL, ESQ., ON
HOUSING OPPORTUNITIES UNDER CITY OF YES**

CITY OF YES! (FOR DEVELOPERS)

by Joel A. Siegel

A flyer from the City of New York arrives in the mail. It's not about recycling, composting, disaster preparedness, or voting. The flyer announces:

**NYC Needs More Housing!
So The City Will Be Transferring Equity From Your Home To A Developer
To Replace The Two-Story House Next To Your Two-Story House
With A Three to Five Story Apartment Building**

Crazy, right? But that is in fact what is proposed by the New York City Department of City Planning (DCP). And the DCP is doing its level best to hide this from homeowners, to give City Council members cover to vote (in the Fall) in favor of the City of Yes...for developers. Not surprisingly, DCP did not send around any flyers announcing its intentions. This Op-Ed is your flyer. Read on.

The City of Yes (COY) is a massive overhaul (called a "text amendment") to NYC zoning rules, which are collectively called the NYC Zoning Resolution. The many elements of COY are packaged in three buckets, two of which – "Carbon Neutrality" and "Economic Opportunity" – have already been passed by the City Council. It is the third bucket, "Housing Opportunity," consisting of 15 elements, that contains three profoundly misguided proposals, which promise to take away a billion dollars in homeowners' equity in order to hand it over to developers, no questions asked. I'm talking about the nest eggs of tens of thousands of City residents. Lifetime savings.

This third bucket contains provisions that have wide support, such as permitting the retrofitting of office buildings for housing. But that's part of the deception. If you package enough good things together for Council members to vote for, maybe they'll overlook the bad things. But make no mistake, the mantra is: "The City needs more housing, and we don't care who gets hurt. And, if we help our friends the developers, so much the better. Maybe they'll even contribute to our election coffers." Particularly galling are so-called "progressives" all in for COY, now best friends forever with developers, and gleefully putting targets on the backs of 1 & 2 family homeowners. Of which I am one, I am a single-family homeowner, having worked all my adult life to have a beautiful home in one of the Victorian Flatbush neighborhoods of Brooklyn, often referred to collectively as Ditmas Park.

There are approximately 691,000 1 & 2 family homes in NYC (the vast majority outside Manhattan), and homeowners like me are now branded as the obstacles and enemies of more (and affordable) housing. No one gave me my home, no one paid my mortgage, taxes or insurance, and no one repairs and maintains my home but me. By branding homeowners as "privileged," the Mayor and the DCP seem to believe that they can take away what's mine and give it to a developer. They're hoping there are enough people who don't care about outer borough homeowners, or won't bother to think through what's being proposed, or simply don't have a conscience. And this is all a cover for the City and State's lack of political will to

maintain and build more and better NYCHA and Mitchell-Lama housing; to prevent and punish the stockpiling of rent-regulated apartments; and to tax the tens of thousands of absentee coop/condo apartment owners, etc. Those ideas are too difficult to handle. It's simply easier to take from others like me.

The name housing opportunity itself is a deception. How can you be against housing opportunities? It's like being against mother's milk. The proposal doesn't provide housing opportunities. It provides development opportunities for outside investors. There are three particularly onerous elements: (1) Transit Oriented Development; (2) District Fixes; and, (3) Accessory Dwelling Units. They're all misnamed.

Transit Oriented Development (TOD) is not transit oriented at all. It simply uses proximity to a subway or rail station (up to half a mile away) as a cover for eliminating zoning controls in portions of low-density zoning districts without going through zoning map changes that would require community board review. Under TOD, streets within one-half mile of a subway station that no rational person would consider as being wide (including one-way streets) are defined as "wide." And in areas now zoned for 1 & 2 family homes ("low density"), any property on a 5,000 square foot lot that's on a "wide" street could be torn down for an apartment building up to five stories. A developer could also buy up houses adjacent to the corner property and build an even larger building. All of this building would be "as of right" under TOD. No questions asked. Developers would be free from Community Board review, losing much of their influence on development. These as of right apartment buildings promise to destroy the design, aesthetics, and character of hundreds of beautiful, strong, thriving neighborhoods in NYC.

Think about the homeowners whose properties are no longer adjacent to a 1 or 2 family house, but instead a brick wall along the adjacent lot line. Think about the reasonable expectations of those homeowners when they invested in and contributed over decades to neighborhoods throughout NYC. TOD pulls the rug out from under them. The moment COY is law, these homeowners' properties would instantly lose significant value. The homes surrounding the new buildings would easily drop in value anywhere from \$100,000 to \$350,000. And if you multiply that by the thousands of affected homes, you're easily talking about a billion dollars (e.g., 10,000 homes x \$100,000). And where does that value go? You got it. It goes directly to the developers who can build adjacent apartment buildings.

Again, as cover for this transfer of wealth, the COY proponents are also selling a charade. They maintain that if developers build these apartment buildings, there will be more housing, and therefore rents will go down. The COY proponents know that this naive and simplistic notion is patently false, and they know this based on NYC history. Rent in NYC is not based simply on supply and demand from Economics 101. Many factors enter into the equation, including, as noted above, the withholding of rent regulated apartments from the market, the purchase of apartments as investments (and not to rent), and short-term rentals. But the critical fallacy in the COY rationale is shown by the fact that developers do not build to lower rents (they really don't), they build only when market forces are in place to maximize returns on investments. In other words, the developer who would build an apartment building on a corner in Victorian Flatbush will only build to sell or rent at a high market rate. No rents go down, and there is no affordable housing. Indeed, TOD contains no affordability.

District Fixes (DF) is another misnomer. It is a response to a small, vocal group of people who want to enlarge their houses without having to obtain variances. The bottom line is houses could be expanded by more than 50% in size. Every house could be a McMansion, eliminating the required approval by the Board of Standards and Appeals, amounting to another gift to developers that would have no effect on the cost of housing. DCP is proposing to accommodate that group by giving expansion rights that will also apply to neighborhoods that collectively don't want monster houses. It isn't a "fix". It is a replacement for a properly review zoning map change. It would be just another attack on the design, aesthetics, and character of hundreds of beautiful neighborhoods in NYC. Contextualization would be thrown out the window.

The provision for Accessory Dwelling Units (ADU) has been presented by the DCP as a benign effort to help families. The idea is that an owner of a home could convert a garage to a residential unit, or build a small backyard unit, to enable a family member (e.g., elderly parents) to live nearby. Again, how can you be against grandmas? But the ADU provision under consideration is a sprawling undefined mess that would permit the building of entire 2-story second homes in backyards, thereby eliminating light, air, and space for surrounding residents. Again, we're talking about destroying neighborhoods, turning them into back yard trailer parks.

There are 59 Community Boards in NYC. The COY has been presented to all of them. So far, 53 Community Boards have posted their votes. 27 out of the 53 Community Board votes posted thus far (6 are not yet officially posted) have rejected COY Housing Opportunities outright, while 23 others have recommended conditions which would significantly change or delete the provisions I've discussed here. Indeed, recently Community Board 4 in Manhattan, which includes Hell's Kitchen and Chelsea, voted no on the Housing Opportunities because of issues in their high-density district. But CB4 also explicitly rejected the COY one-size fits all approach, showing an understanding that COY may hurt people throughout the City. In other words, it wasn't just about them. CB4 gets my heartfelt thanks for having a conscience.

Lastly, there are other ways of doing things. Fifteen years ago, and after more than three years of meetings and work in good faith by members of my community with the DCP, the 2009 Flatbush Rezoning ("2009 FR") was approved. Unlike the COY, the 2009 FR was a collaborative effort based on meaningful community engagement. 2009 FR protected homes, and up-zoned our commercial corridors. As a result of the 2009 FR, several thousand units of housing have been created in our district, and more are on the way. We showed there is no need for the bulldozer one-size-fits-all approach of COY in order to create more housing.

The City would be better served if the DCP did the hard work of meeting with communities as they did in 2009, and tailoring plans for each community. Instead of the hostility they are facing now over COY, the DCP would engender respect and appreciation. I am not holding my breath. Only a relentless grassroots campaign of pressure on Council members will prevent the profoundly inappropriate provisions of COY from becoming law.

**LETTER TO DEPARTMENT OF CITY PLANNING,
BY JOEL A. SIEGEL, ESQ., DATED JULY 2, 2024**

JOEL A. SIEGEL
ATTORNEY-AT-LAW

July 2, 2024

Department of City Planning
City of New York
120 Broadway, 31st Floor
New York, New York 10271

Re: Opposition to City of Yes

To the New York City Department of City Planning:

I reside in Ditmas Park West, one of the Victorian Flatbush neighborhoods in Brooklyn. I am an active member of the community. I was the president of the Ditmas Park West Neighborhood Association for over ten years, and am currently a member of Community Board 14, but write now as an individual community member and homeowner.

I participated in the 2009 Flatbush Rezoning ("2009 FR"), which was a long-term plan reached by meaningful community engagement over several years. Community members were included in the formulation of the 2009 FR. As a result of the 2009 FR, Victorian Flatbush was preserved by rezoning to R3X, and our commercial corridors were upzoned, leading to the current surge in building along Coney Island Avenue and Cortelyou Road. Various provisions of the "Housing Opportunity" component of the City of Yes ("COY") fundamentally undermine the work the concerned citizens of Victorian Flatbush did with the Department of City Planning ("DCP") in 2009. Frankly, these provisions amount to a kick in the teeth, and they deliver a message to the residents of Victorian Flatbush that DCP cannot be trusted. If enacted, the Transit-Oriented Development, District Fixes and Accessory Dwelling Units provisions of the COY would spell the end of large swaths of Victorian Flatbush, an area that has been preserved by my neighbors and their predecessors for over 100 years. Beautiful homes would be torn down for luxury apartment buildings. It is, on no uncertain terms, a gift to developers; and, it is completely unnecessary if creating more housing is the sole goal. Bottom line is there are ample opportunities for building housing without bulldozing Victorian Flatbush. The COY takes a sledgehammer approach, without any concern for neighborhoods. Unlike the process leading to the 2009 FR, the people who formulated the COY did absolutely no community engagement. Stakeholder meetings for the current proposals did not include community members or community boards. Many members of my community view the COY as a betrayal of our good will and the work we did only 15 years ago for more housing.

NEW YORK, NY 10007
NEW JERSEY OFFICE: OMERDALE, NJ 08083
ADMITTED IN PA

While I have been a practicing attorney for almost 40 years, I am not a zoning expert. I leave it to my other Victorian Flatbush neighbors who are, for them to detail for you (as they are doing) the specifics of the offending COY provisions. Nevertheless, I must make the following comments:

1. There was no effective communication to the public about the massive COY changes (1386 pages!) to zoning of R1-5 areas. Victorian Flatbush residents are still finding out now about how their lives would be materially altered by the proposed zoning changes. The City is somehow able to send mass mailings for all sorts of information (e.g., recycling events, composting, elections, etc.), but for some reason(s) it did not see fit to do so for the COY. While Community Board 14 does its best to disseminate information, this is not a substitute for informing the public about something so fundamental about our way of life. The COY proposals now being considered certainly require further and more expansive explanations to the public by the DCP, including meetings with affected neighborhoods, and not just extremely limited public comments at a community board meeting. The COY is too much too quickly. My neighbors are of the belief they are being blindsided, and they are appalled by a process that is pitting neighborhoods against each other. They are justifiably concerned that the DCP will justify a favorable vote on COY because some community boards will support provisions that do not affect them (why should they care), at the expense of other neighborhoods. My neighbors believe quite rightly that this is fundamentally unfair and a charade.

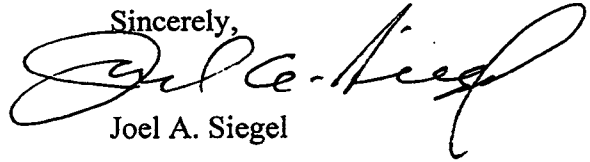
2. The COY takes a one-size fits all approach across the City, without consideration of differences among neighborhoods. There is no nuance. Consideration of environmental impacts has been cursory, at best. (The sewers in Victorian Flatbush already cannot handle drainage.) Indeed, and most dramatically, the COY utterly fails to account for the 2009 FR, which was the product of all the various interested parties coming together in good faith and reaching a community-wide consensus of what was best (on a long-term basis) for our area of New York City, while recognizing the need for affordable housing. It is my understanding that over the past decade, and almost entirely as a result of the 2009 FR, approximately 2600 residential units have been completed in Community District 14. Unlike the COY, there was no contentiousness when the 2009 FR was enacted. I spoke at the June 3, 2009, public hearing at the DCP for the 2009 FR. Twenty-two people spoke in favor. I don't recall a single person speaking in opposition. I would hope, but I am not confident, that the amount of opposition to the COY should give the DCP pause, to go back to the drawing board, and to do the hard work of meaningful community engagement.

3. The beauty of Victorian Flatbush is the soul of my community, and it is an economic engine to be preserved for future generations. In addition to the existing landmark designated areas of Victorian Flatbush, the Ditmas Park West and Beverly Square West neighborhoods were surveyed by the Landmark Preservation Commission, and we were told that our neighborhoods were worthy of future consideration for landmark designation. The proposed COY provisions and the destruction of homes would effectively end the quest for landmark status.

4. Finally, I call to your attention a fatal flaw in the entire COY rationale, that increased construction will lead to greater affordability. Eric Kober, former City Planning Director of Housing, Economic and Infrastructure Planning, in his recent lengthy review of COY, found that an increase in affordable housing "would be effective only with state legislation to reinstate a

property-tax exemption.” But this is not on the table. My neighbors recognize that the COY proposals are an attempt to solve a pressing City issue. However, as it stands, the COY is so unnecessarily sweeping and vast, that it essentially marks the end of meaningful local zoning regulation, but without any concretely projected impact on affordability.

Sincerely,

A handwritten signature in black ink, appearing to read "Joel A. Siegel", written in a cursive style.

Joel A. Siegel

BEFORE



AFTER



From: [Catherine Vaughan](#)
To: [Land Use Testimony](#)
Subject: [EXTERNAL] Testimony in favor of COYHO
Date: Thursday, October 24, 2024 9:58:50 PM

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My name is Catherine Vaughan, and I am a resident of Park Slope, a mother of two, a renter, a transit and bike rider, and a person who cares deeply about our city growing, thriving, and being welcoming to all who wish to live here.

I write in support of the City of Yes for Housing Opportunity. New York City's housing crisis has led to many families like mine being priced out of the city. It's made New York inaccessible and unaffordable for students and young people, the working class, artists, immigrants, strivers -- the very types of people who breathe life and energy into our amazing city.

To combat this crisis, we desperately need to build more housing. While COYHO won't fill the entire gap, it is a critical first step in ensuring that there are enough homes for everyone who needs one. Its provisions are modest, sensible, and equitable -- reforming zoning codes that haven't been changed since 1961, eliminating costly and regressive parking mandates, allowing small apartment buildings in transit-rich areas, and building a little more housing everywhere (including in my own neighborhood, which has historically contributed less to the housing supply than it proportionally should have). And it promises both to make housing more affordable and to drive economic and job growth.

I came to New York 16 years ago with big dreams -- to "make it" in New York, to eke out a living, to put down roots here. I met my husband here and started a family, and we dream of living, working, and retiring in New York. We're raising two beautiful, strong, savvy New York kids, and like any parents, we dream of them making their own homes and starting their own families in New York a few decades down the line, rather than being forced to move out of the city because it's less and less affordable every year. With COYHO, you have an opportunity to make this dream of ours -- and of so many New Yorkers -- a reality. Please help make housing more affordable, and our city more livable and welcoming, by voting in favor of COYHO.



Testimony Before the New York City Council Subcommittee on Zoning and Franchises regarding the City of Yes for Housing Opportunity

October 25th, 2024

Good morning. My name is Christie Peale, and I am the Executive Director & CEO at the Center for NYC Neighborhoods. I would like to thank Subcommittee Chair Kevin Riley, Committee Chair Rafael Salamanca, Speaker Adrienne Adams, and the New York City Council for holding this important hearing on the City of Yes for Housing Opportunity. We look forward to continuing to partner with the Department of City Planning, the City Council, and the Adams' administration to achieve our mission of promoting and protecting affordable homeownership in New York so that middle- and working-class families can live in strong, thriving communities.

We support the City of Yes Housing proposal but with conditions. While the City's proposal represents the most sweeping overhaul of NYC's zoning code since 1961, this testimony will focus on four areas related to homeownership:

- Opportunities for New Affordable Homeownership
- Opportunities for Existing Homeownership Offered by Accessory Dwelling Units (ADUs)
- The City of Yes and its impacts on Black Homeownership
- Preservation of Existing Homeownership

About the Center for NYC Neighborhoods

The Center promotes and protects affordable homeownership in New York so that middle- and working-class families are able to live in strong, thriving communities. Established by public and private partners, the Center meets the diverse needs of homeowners throughout New York State by offering free, high-quality housing services. Since our founding in 2008, our network has assisted over 200,000 homeowners. We have provided more than \$60 million in funding to community-based partners. Major funding sources for this work include the New York City Department of Housing Preservation and Development, the Office of the State Attorney General, other public and private funders. Additionally, since 2021, the Center's subsidiary, Sustainable Neighborhoods, has administered the New York State Homeowner Assistance Fund in partnership with New York State Homes and Community Renewal (HCR), which has distributed over \$400 million federal relief dollars to homeowners affected by the pandemic who are struggling with housing payments.

New Affordable Homeownership Opportunities

The City of Yes Housing proposal has the potential to significantly increase equity and ensure all New Yorkers have equitable access to newly developed affordable homeownership, including co-ops and condos, and to expand access to generational wealth for New Yorkers who have been excluded from homeownership opportunities. By helping neighborhoods expand their housing supply, the City of Yes

aligns with the Center's efforts to promote equitable housing opportunities and enhance generational wealth for homeowners.

Furthermore, the recent commitment of \$2 billion in new capital funds for affordable housing, thanks to the HOMES NOW campaign, presents an opportunity to leverage this funding, along with the new 485x tax abatement, with zoning changes. This combination could radically increase the supply of affordable homeownership, allowing longtime New Yorkers to achieve and maintain homeownership.

The City of Yes housing proposal could greatly enhance new affordable homeownership opportunities, especially for historically excluded communities. By investing \$9 billion in affordable homeownership through programs like Neighborhood Pillars and Open Door, we estimate that NYC could create 120,000 new affordable units for 400,000 New Yorkers over the course of the decade. This initiative has the potential to close the racial wealth gap and promote generational wealth, aligning with our mission to foster equitable homeownership.

Currently, 30 percent of New Yorkers own homes, but the rates vary significantly by race: 41 percent of White New Yorkers own their homes, compared to only 26 percent of Black New Yorkers and 18 percent of Latino New Yorkers. We will never close this racial homeownership gap without increasing the supply of affordable homeownership, which is why the Universal Affordability Preference has tremendous potential to positively impact BIPOC homeownership. And as a member of ANHD, we also support all of their recommendations for increased affordability, with the Town Center and TOD zoning proposals in particular.

Additional Affordable Homeownership Opportunities at Scale Proposal & Vision

The Center proposes an ambitious new program to dwarf Mitchell-Lama, and create 120,000 new permanently affordable units for 400,000 New Yorkers at a cost of \$9 billion. This proposed project would serve as an assertive, yet achievable, model for cities to do more than chip away at the problem. This turbocharge of homeownership, for those historically left out of this wealth-building opportunity, would make New York City home to the largest middle class in the nation.

Much like the Mitchell-Lama program, New York State would be asked to provide a combination of tax abatements, tax exemptions, the removal of regulatory impediments, and subsidized land for development. Likewise, unions and life insurance companies would be allowed as active stakeholders that put equity into these projects. On the other hand, unlike prior attempts, New York City would contribute down payment assistance, pre-purchase counseling, and estate planning to ensure that these units are both accessible and maintainable.

Using a mixture of homeownership structures, including limited equity co-ops and condos as well as community land trusts, this proposal will ensure that these new homeownership projects don't lose affordability.

In short, this visionary plan dramatically reduces the racial wealth gap by taking direct action to increase the number of LMI homeowners, including many new homeowners of color, in New York. The success of this proposed project would result in the balancing of homeownership rates and create significant

intergenerational impact. For example, if Black families were as likely as White families to own their homes, median Black wealth would grow by \$32,000 and the wealth gap between Black and White households would shrink by 31 percent. Under the same scenario, the median wealth for Latinx families would grow by \$29,000 and the wealth gap with White households would shrink by 28 percent. To ensure a future where New York can support a vibrant middle class that is possible for New Yorkers of all races and backgrounds, creating a new Mitchell-Lama project has to go hand-in-hand with the City of Yes proposal.

Opportunity to Sustain Homeownership with ADUs

Second, the City of Yes Housing proposal presents a valuable opportunity to support low- to moderate-income homeowners at risk of displacement by enabling the voluntary addition of ADUs. With the potential to add backyard cottages, garage conversions, and basement apartments to the city's 1.4 million one- to four-family homes, ADUs can provide crucial financial relief to homeowners burdened by repair and maintenance costs. This is especially important for seniors on fixed incomes who are aging in place.

However, to fully realize the benefits of ADUs, it is essential for NYC to provide dedicated funding for outreach, technical assistance, and construction financing. This support will ensure that low-income homeowners can successfully create or rehabilitate ADUs, while avoiding the risk of widening existing inequities and the racial wealth gap, particularly in neighborhoods historically affected by redlining and discrimination.

Moreover, there is an opportunity for community-based and community-led designs for ADUs that complement the unique characteristics of the city's historic homeownership neighborhoods like Canarsie, Laurelton, and Addisleigh Park. The City of Yes proposal not only expands housing opportunities but also aids existing homeowners by enabling them to use ADUs to generate rental income, house aging family members, or accommodate their children, thus helping them build and preserve generational wealth.

New York City should consider following the examples set by cities in California and Oregon to ensure ADUs effectively benefit homeowners, multi-family properties, and renters alike.

The CofY Potential to Increase Black and Brown Homeownership

To be clear, among all of the provisions of the City of Yes proposal, we believe that the Universal Affordability Preference (UAP) and the legalization of Accessory Dwelling Units (ADUs) will most significantly enhance homeownership affordability and advance racial equity. UAP mandates that new developments allocate additional space for permanently affordable housing, directly addressing the shortage of affordable options for low-income and minority households. This inclusion fosters diverse, equitable communities by making homeownership accessible to a broader range of low to moderate incomes. Meanwhile, ADUs provide affordable housing solutions on existing properties, creating opportunities for families and individuals to secure stable, low-cost housing. Together, UAP and ADUs promote greater housing equity and inclusion, supporting historically marginalized communities in achieving homeownership.

Several additional aspects of the City of Yes have the potential to significantly impact Black homeownership in New York City, aligning with the Center’s efforts to ensure equitable access for Black and Brown families. Our organization’s pilot initiative, the Black Homeownership Project, underscores the importance of supporting these communities to maintain their homes and build generational wealth. The project focuses on ensuring that Black and Brown families, essential workers across all professions, have equitable access to homeownership opportunities and the ability to sustain their homes similarly to White families. Increasing new affordable homeownership will reduce pressures in gentrifying areas and allow families to remain in NYC. However, more efforts are needed to combat displacement, predatory pressures, deed theft, and speculation, while increasing resources for homeowner repair to address deferred maintenance and enhance home sustainability and resilience to climate change.

Our organization’s pilot initiative, the Black Homeownership Project, underscores the importance of supporting these communities to maintain their homes and build generational wealth. The Black Homeownership Project’s policy agenda focuses on the following areas:

1. End Predatory and Speculative Systems That Encourage Gentrification and Displacement
 - a. Speculative markets, predatory investors, and unaccountable corporations undermine Black homeownership and wealth. They exacerbate the racial wealth and housing gap, leading to increased risks such as deed theft, scams, discriminatory mortgage practices, gentrification, higher housing costs, deferred maintenance, and displacement.
2. Commit Long-Term Investments in Black Homeownership Stabilization Programs
 - a. Stabilizing Pathways to Homeownership
 - i. Due to biases from lenders, appraisers, and developers, this project aims to increase Black and BIPOC homeownership levels to close the generational wealth gap and advocate for policies that address barriers to homeownership.
 - b. Maintaining the Stability of Existing Black Homeownership
 - i. Black and BIPOC homeowners need continuous support for foreclosure prevention, home repair (the leading cause for mortgage defaults), estate planning, and landlord-tenant mediation to help them keep their homes.
3. Increase the Supply of Social, Public, and Affordable Homeownership Housing Models
 - a. To ensure equitable access to housing, we must increase the supply of social, public, and affordable homeownership models. This expansion should occur without causing displacement, discrimination, or harassment. ADUs, alongside community land trusts, and limited equity Mitchell Lama cooperatives play a crucial role in enhancing housing security, reducing foreclosures, maintaining equity, and protecting marginalized communities during economic downturns. Additionally, dedicated resources must be specifically allocated to support affordable homeownership initiatives to ensure long-term affordability and wealth-building opportunities for all.
4. Prioritize Healthy and Resilient Housing
 - a. BIPOC homes bear the brunt of impacts from climate change and extreme weather. Their homes should have access to rehabilitation, disaster preparedness, and energy efficiency measures to ensure safety and health.
5. Grow Black Community Wealth Networks

- a. Black wealth has been undermined and stolen by predatory private investors, corporations, and real estate entities due to intentionally racist housing policies. It is essential to build these networks and provide communities with financial education.

Similarly, the City of Yes seeks to reduce pressure on gentrifying areas, provide more housing types and options, and create more flexibility for single- and two-family homes. The proposal is essential in ensuring BIPOC homeowners gain additional opportunities to maintain their homes and prevent displacement or threats of gentrification within neighborhoods across NYC. It ensures we take steps towards addressing the racial homeownership gap and builds opportunities for BIPOC homeowners. We are aligned with this proposal as it provides pathways to homeownership for Black and Brown families making it more accessible and equitable.

Recommendations

The City of Yes has the potential to significantly advance racial equity by reforming zoning laws in low-density neighborhoods, permitting mixed-use development, and encouraging the creation of Accessory Dwelling Units (ADUs) in single-family homes across NYC. These changes could vastly expand affordable homeownership opportunities, facilitate the development of multi-family homes, and address the critical shortage of housing.

To effectively implement ADUs, robust funding mechanisms for nonprofit community-based organizations (CBOs) are essential. These CBOs are vital for providing technical assistance to homeowners, guiding them through zoning laws, financing, design requirements, and construction processes. We strongly advise that adequate funding should be allocated to offer financial aid or incentives for ADU projects, which will create affordable rental options while simultaneously providing financial support for homeowners. For example, California's ADU Grant Program provides grants up to \$40,000 to cover pre-development costs, demonstrating how financial support can make ADU projects viable for homeowners. Additionally, California's successful public-private partnerships combine resources and expertise, building trust and ensuring effective outreach to maximize the impact of ADU initiatives.

Additionally, we urge the council to have a strong homeownership preservation outlook that aligns with their support of the City of Yes proposal, ensuring affordable homeownership is accessible to all New Yorkers. Currently, there is an existing 8% of homeowners in New York in mortgage delinquency, particularly in BIPOC communities. The Center's Foreclosure Prevention Program assists over 2,000 clients annually across all boroughs. We ask the city to invest \$8 million in homeowner services to prevent foreclosure and to support the Black Homeownership Project (BHP) Generation 2 Generation, an estate planning initiative to protect family assets. These programs will secure and maintain affordable homeownership in BIPOC communities providing them with much needed services.

Given the pressing need for home repairs, the Center advocates for additional funding of the HomeFix program administered with the Department of Housing Preservation and Development (HPD), which provides accessible loans for necessary repairs, ensuring families can maintain safe and stable living conditions. Homefix contributes to the overall goal of home preservation and ensures the conditions of a

home don't fall into despair. This program secures opportunities to maintain existing homeownership and eases the #1 cause of mortgage delinquency for homeowners - home repair and maintenance costs.

Community input is also vital—engaging local residents in the planning process ensures that affordable homeownership initiatives meet their needs and gain their support. We recommend funding CBOs in order to systematize the dialogue between community members, homeowners, and neighborhoods to identify and promote sites for affordable homeownership.

These recommendations must be fully incorporated into the City of Yes in order to ensure equitable access, prevent homeownership displacement, and foster meaningful community engagement throughout the development process.

Conclusion

Thank you for the opportunity to testify. We want to emphasize the need for adequate staffing and planning within city agencies, including HPD, the Human Rights Commission, DOB, and SBS, to enforce existing laws effectively and prevent issues such as tenant harassment, deed theft, source of income discrimination, and commercial tenant harassment. These measures are crucial to ensuring that New Yorkers have access to safe, healthy, and affordable housing, and to maintaining economic stability for low- to moderate-income families of color. We look forward to continuing our collaboration with the administration and providing feedback on how we can build a more equitable city for all.

From: [Chad Horner](#)
To: [Land Use Testimony](#)
Subject: [EXTERNAL] City of Yes for Housing Opportunity
Date: Friday, October 25, 2024 9:56:22 AM

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe. Report suspected phishing emails with the Phish Alert Button or forward them to phish@oti.nyc.gov as an attachment.

Hello there, given I wasn't able to speak during the session on Tuesday I am including my prepared testimony here. Thank you!

Hi everyone, my name is Chad Horner. I've lived in New York for the past 10 years, as a renter, and I'm currently residing in Fort Greene.

I'm speaking today to express my overwhelming support for the City of Yes for Housing Opportunity. We New Yorkers are in the midst of a housing affordability crisis. I love this city, and fully believe that it is the greatest city in the world, and there is no place I would rather live. While I am lucky enough to have a job that pays me enough to know that I will be able to afford to stay in New York if I want to - at least for now! - many others are not so lucky.

I have friends who have left the city because of rising rents, and other friends who talk about moving back someday but can't see a way they could afford to raise a family here. But to me this is about much more than my friends. The true magic of New York lies in its diversity—people from different income levels, nationalities, professions, and backgrounds coming together to create a vibrant, dynamic community. If we stand by and do nothing to address the housing crisis, New York is going to continue on the path towards being nothing more than a playground for the wealthy and privileged.

While there is certainly more to be done beyond what is being discussed here today in order to make New York a more affordable place to live in, the City of Yes for Housing Opportunity is unambiguously a step in the right direction, and I urge the Council to pass this into law without modifications.



The Honorable Kevin Riley
Chair, Subcommittee on Zoning and Franchises
Planning and Land Use Committee
New York City Council
250 Broadway, Room 1770
New York, NY 10007

Re: In support of City of Yes for Housing Opportunity

Dear Chair Riley:

On behalf of the Chamber of Progress, a tech industry coalition promoting technology's progressive future, I write in **support of City of Yes for Housing Opportunity**, which would take reasonable steps to modernize New York City's zoning laws in order to increase housing supply and lower housing costs for City residents.

New York City's housing crisis is one of the worst in the nation. New York City has the highest average rental costs among America's top 50 cities with the average rent a whopping \$5,488 for a two-bedroom apartment, \$4,333 for a one-bedroom, and \$3,292 for a studio.¹ Furthermore, the City's rental vacancy rate fell to a multi-decade low of 1.4% in 2023 – and the vacancy rate of apartments that rent below \$1,650 to less than 1%.² At the same time, New York City's housing stock has only increased 4% since 2010.³ The result is a lack of affordable housing and severe overcrowding: New York City's severe overcrowding rate reportedly more than double the national average with more than 170,000 households having more than 1.5 people per room.⁴

The burden of high housing costs is not equally distributed. According to New York City's own reporting, the most vulnerable residents are often hardest hit by the City's housing crisis: "While the resulting affordability pressures have increasingly been an issue for people across the income spectrum, they have been particularly harsh on low-income and working class New Yorkers. While research has shown that development of market rate housing can help alleviate the shortage across the income spectrum, that relief is felt least and slowest by those with the lowest incomes."⁵ This has resulted in what some

¹ <https://www.rent.com/research/average-rent-prices-in-the-largest-cities/>

² <https://comptroller.nyc.gov/reports/spotlight-new-york-citys-housing-supply-challenge/>

³ <https://www.pewtrusts.org/en/research-and-analysis/articles/2023/05/25/new-yorks-housing-shortage-pus-hes-up-rents-and-homelessness>

⁴ <https://cbcnyc.org/building-crisis>

⁵ Ibid



have called “a hemorrhaging” of Black and Brown New Yorkers who move out of the City to find more affordable housing elsewhere.⁶

City of Yes for Housing Opportunity seeks to address the housing at its root by modernizing outdated zoning laws impeding new and innovative construction.

Restrictive and overcomplicated housing regulations dating back to the 1960s are preventing New York City from converting vacant and non-residential buildings into housing units, building new housing, and rethinking existing housing structures.⁷ Under the City of Yes plan, this would change through several policies Chamber of Progress supports nationally to address housing.⁸ These include: allowing existing buildings to add more units and mixed-use housing like duplexes; legalizing and regulating "accessory dwelling units," or ADUs; and ending restrictive parking mandates for new housing. In all, City of Yes has the potential to create as many as 108,850 new homes over the next 15 years.⁹ By modernizing the City's outdated zoning and incentivizing the construction of new, affordable housing units, City of Yes will help ease the pressure on housing prices for all New Yorkers.

Historically, New York City has failed to address the shortage of housing units, but today has the opportunity to make significant progress by approving the reasonable approaches of City of Yes for Housing Opportunity.

For those reasons, we urge you to **support** this important initiative.

Sincerely,

Brianna January
Director of State & Local Government Relations, Northeast US
Chamber of Progress

⁶ <https://nypost.com/2024/02/21/real-estate/family-sized-affordable-units-in-nyc-hardly-exist-study/>

⁷ <https://www.nyc.gov/content/getstufdone/pages/housing-opportunity>

⁸ <https://bringcostsdown.org/housing/>

⁹ <https://www.nyc.gov/content/getstufdone/pages/housing-opportunity>

[EXTERNAL] City of Yes

Charles Haynes < >

Tue 10/22/2024 10:23 PM

To: Land Use Testimony <landusetestimony@council.nyc.gov>;

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Hello,

I'm a resident and homeowner on the Upper East Side. I fully support the City of Yes. It's unfortunate seeing testimony from some politicians who think there's, somehow, a way to close the city to new residents and that parking should get priority.

Please support City of Yes. Please support ending parking mandates. Please support a more affordable New York.

Thank you,

Charles Haynes



New York, NY 10075

Sent from my iPhone

[EXTERNAL] Vote in favor of the City of Yes for Housing Opportunity

Charles Wang < >

Wed 10/23/2024 10:12 AM

To: Land Use Testimony <landusetestimony@council.nyc.gov>;

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Dear City Council,

I am writing to urge you to vote in favor of the City of Yes for Housing Opportunity.

Housing abundance is the key to ensuring a vibrant, growing city and economy. It is also essential to make the city accessible and livable to as broad a cross-section of society as possible. As someone who has an abiding fondness for New York City and also spent several years in San Francisco, one of my gravest concerns about NYC's future is the possibility that the population will be hollowed out of all but the highest-earning residents, simultaneously suffer both high taxes and deteriorating public services, and so thoroughly choke off its own economic dynamism that its tax base erodes as people and corporations alike decamp to regions where the cost of living is lower because more housing is built.

San Francisco's misfortunes are, bluntly, self-inflicted. Proposition 13, which created powerful incentives across California for residents to "age in place," and the mass downzoning of the city, both in 1978, have made building additional housing in San Francisco nearly impossible. This cautionary tale is a photo negative of what a city that wants to promote housing affordability should do. Instead of capping property taxes and limiting reassessments to when property changes ownership, land value should be taxed heavily to promote high ROI usage. Instead of downzoning, a city should upzone.

As a current resident of Long Island City, one of the most gratifying and refreshing developments I have seen is the construction of more high rises, the steady entrance of more residents, and the opening of more businesses. We need more of this across the city.

Thank you,
Charles Wang

From: [Charlie Zhen](#)
To: [Land Use Testimony](#)
Subject: [EXTERNAL] City of Yes Written Testimony
Date: Thursday, October 24, 2024 11:22:20 PM

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Hello,

As a born and raised New Yorker, I am proud to support the City of Yes proposal to make New York more livable, affordable, and inclusive. The beauty of New York is that anyone can become a New Yorker. Affordable, abundant, and accessible housing is key to making sure future generations can continue to plant roots, grow, and thrive in the city. High housing costs drive New Yorkers out to cheaper parts of the country. High housing costs prevent our city from growing, keep our businesses from accessing new customers, dampen enrollment in our schools, and suppress our city's long-term potential. We are already falling behind when it comes to building house, advancing affordability, and creating opportunity for New Yorkers to prosper here. Some xenophobic, nativist voices may be loudly against this proposal, but there are many more New Yorkers like me who were born and raised here and want others to be able to experience the same opportunities I have been able to. We must make New York affordable, we must build housing so New Yorkers can stay in New York, and we must make the right policy choices that support an inclusive and affordable future.

Best,
Charlie Zhen (he/him/his)

From: [Chester Gross](#)
To: [Land Use Testimony](#)
Subject: [EXTERNAL] City of Yes For Housing Opportunity
Date: Thursday, October 24, 2024 7:43:51 PM

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Hello,

I am writing this letter to let you know about my opposition to The City of Yes Housing Opportunity. As a born and raised New Yorker, I've seen with my own eyes that housing is an issue, but this is not the way to accomplish affordable housing. Coming from Community district 14, full of Victorian homes, I've seen the proposal for my district and it is frightening. Adding thousands of units in an area that is not well equipped to handle more residents is a recipe for disaster. I am against the City of Yes Housing Opportunity.

Thank you,
Chester Gross

From: [China Beth](#)
To: [Land Use Testimony](#)
Subject: [EXTERNAL] Parking requirements
Date: Wednesday, October 23, 2024 8:45:48 AM

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Lifting parking minimums has the power to transform our ability to build housing. As a native New Yorker I fully support lifting parking requirements. Yes to the City of Yes!

China Parmalee
Upper West Side

[EXTERNAL] City of Yes Housing

Christopher Cea <



Mon 10/21/2024 8:31 PM

To: Land Use Testimony <landusetestimony@council.nyc.gov>;

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No to City of Yes. Preserve City Islands Special District Zoning
Chris Cea
City Island Resident

Chris Coppa

Staten Island, NY 10301

Mayor Eric Adams and the City Council

10/20/2024

Dear Mayor and our City Council members of NYC,

We are against the City of Yes Proposal in Staten Island because we don't have the infrastructure to support it.

These changes would greatly impact Staten Islanders.

We only have 2 highways which are already overly congested as it is, for the full day.

We don't have a subway system and our bus system is poor as well. In a recent study, it was found that half of the buses were not able to go out because of maintenance issues and lack of drivers.

The roads are narrow -
Most main roads such as Amboy Road, Victory Boulevard, Forest Avenue, Seguin Avenue, Post Avenue, Castleton Avenue and others have only a single lane in each direction.

A normally 15 minute bus ride to the ferry took almost an hour this morning
The side streets only have a single lane as well.

We only have 2 full hospitals and no city hospitals.

Emergency personnel won't be able to respond to emergencies in a timely manner.

We don't have enough firehouses and firemen to handle the current fires. Sometimes when there is a large fire, firemen are sent here from Brooklyn because we don't have enough firemen.

We only have four precincts and without an increase of police officers. When the 121 Precinct was built, they pulled policemen from ^{OUR} other precincts to man it.

Our schools are overcrowded as it is.

Our outdated sewer system cannot handle more buildings.

To inexpensively increase housing stock in NYC:
There are currently more than 60,000 empty apartments that need to be inspected, renovated and rented

before more buildings go up. Those apartments should have rent control and rent stabilization laws removed so that the landlords can realistically rent them out at a profit. Subsidized

apartments should have income caps that are enforced.

Succession of rent controlled + rent stabilized

apartments should be abolished. There is too much
abuse with people who have 2 homes or →

have taken ^{over} an apartment
illegally. The legal tenant
moved out + lets someone
else "take over" the apartment
at the low rent.

FATHER KAVAZA

6 [REDACTED] AVE [REDACTED]

Joseph + Yekna Alexander

7 [REDACTED]

Steven BASILE

[REDACTED]
[REDACTED]

Anthony MASSA

[REDACTED]
[REDACTED]

John A. Donnellan

[REDACTED]
[REDACTED]

Lillian D'Armetta

[REDACTED] [REDACTED] [REDACTED]

Staten Island, N.Y. 10301

CAROL BERARDI

[REDACTED]

SI, NY 10301

Arka Mher

[REDACTED]

SI

N'S 10301

XXXX Medicine

ST

SI NY 10301

Jimmy Gufos

10301

Brian Roun

Richard Sullivan

Diane Nicoletti

Stamford, N.Y. 10301

John Malzer

SI NY 10310

CESAR TORALES

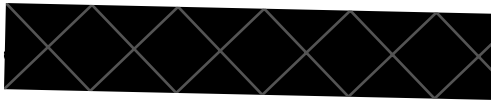
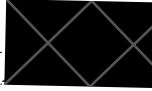
SI, NY 10301

BRICK M. East

SI NY 10301

JOHN BLOTT

Wif



to 12/14/15

Ruth

5/6



ruthyresendiz@icloud.com

[EXTERNAL] I support lifting Parking Mandates and City of Yes: Housing Opportunity!

Chris Dunn <>

Fri 10/25/2024 2:45 PM

To: Land Use Testimony <landusetestimony@council.nyc.gov>;

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I support this strongly. If builders want to build with parking, so be it. But it's nuts for the city to mandate that with the housing crisis we have. Thank you

Chris Dunn
Williamsburg, Brooklyn

From: [Chris Efthimiou](#)
To: [Land Use Testimony](#)
Subject: [EXTERNAL] City of Yes for Housing Opportunity
Date: Friday, October 25, 2024 9:48:43 AM

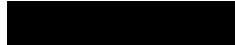
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Dear City Council of New York,

I fully support lifting parking mandates on new housing developments. Doing so will increase the supply of much needed housing, including affordable housing, and reduce the focus and reliance on automotive transportation.

Thank you,

Chris Efthimiou



Astoria, NY 11106

[EXTERNAL] City of Yes feedback

Chris Lindsay-Abaire <[REDACTED]>

Wed 10/23/2024 12:30 PM

To: Land Use Testimony <landusetestimony@council.nyc.gov>;

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Dear City Planning Commission and City Council Members,

As a long-time resident of Prospect Park South in historic Victorian Flatbush, I am writing to express my strong opposition to the City of Yes zoning proposals, particularly the Transit-Oriented Development (TOD) provisions that would dramatically alter the character of our unique neighborhood.

Our community, with its Victorian homes, deep setbacks, and tree-lined streets, represents one of the nation's most significant collections of turn-of-the-century residential architecture. In 1979, Prospect Park South was designated as a Historic District precisely because of its exceptional architectural and historical significance. The proposed TOD upzoning threatens to undermine the very qualities that make our neighborhood special.

Specific concerns about TOD implementation in our area include:

1. Architectural Heritage at Risk

- The proposed zoning changes would enable development that could dwarf our historic homes
- New construction would disrupt the intentional garden suburb planning principles that define our neighborhood
- The distinctive architectural harmony of our streets would be permanently compromised
- Our only protection is the Landmark Commission and we run the risk that a pro-development mayor like Mayor Adams could appoint an anti-historical commission

2. Infrastructure Crisis

- Our century-old infrastructure is already stressed beyond capacity
- Raw sewage regularly backs up into basements during heavy rains due to our overwhelmed combined sewer system
- Local schools are overcrowded, with some at 150% capacity
- Power grids aren't built for large multifamily units
- Subway platforms at Church Avenue and Beverley Road are dangerously overcrowded during rush hour
- The B/Q lines cannot handle additional ridership without significant upgrades

3. Quality of Life Impact

- Increased density would eliminate the unique suburban-in-the-city character
- The proposed changes would reduce green space and tree coverage
- Additional parking demands would overwhelm our residential streets

4. Property Value Concerns

- Many residents have invested significantly in maintaining historic properties
- Dramatic zoning changes could destabilize property values
- The unique character that draws buyers to our area would be diminished

5. Gentrification and Displacement Effects

- While our historic district has some protection, surrounding areas will face immense development pressure
- Long-term residents in nearby Flatbush, East Flatbush, and Ditmas Park would face displacement
- New luxury development would raise property taxes and rents throughout the area
- Local small businesses serving existing communities would be priced out
- The proposed changes would accelerate the displacement of immigrant communities
- Despite promises of affordable housing, market-rate units would predominate

6. Governance and Oversight Concerns

- The administration is rushing through massive citywide zoning changes without adequate community input
- The City of Yes process lacks transparency about which developers stand to benefit
- There are serious questions about oversight and accountability in the planning process
- The current administration faces multiple investigations that raise concerns about developer influence
- The city has failed to provide clear data on infrastructure capacity
- Community Board recommendations are being systematically ignored
- Environmental review processes are being fast-tracked without proper study

I agree that our city faces serious infrastructure challenges that must be addressed before any significant upzoning. We need:

- A comprehensive infrastructure upgrade plan with dedicated funding
 - Modernization of our sewage and water systems
 - Significant improvements to subway capacity and reliability
 - School capacity expansion
 - Power grid upgrades
- These infrastructure improvements should be completed before considering any density increases.

While I support the city's need to create additional housing, this should not come at the expense of destroying designated historic districts that contribute to New York City's architectural heritage or displacing existing communities. I urge you to:

- Exempt designated historic districts from TOD upzoning
- Maintain current zoning restrictions that protect our neighborhood's character
- Consider alternative locations for density increases that won't compromise historic resources, such as our rezoning plan in 2009 to up zone Coney Island Ave
- Work with preservation groups to identify appropriate areas for development
- Require meaningful percentages of deeply affordable housing in any new development
- Implement strong anti-displacement protections for existing residents
- Prioritize infrastructure improvements before any upzoning
- Institute stronger oversight and transparency measures for zoning changes
- Require detailed disclosure of developer relationships and influences
- Mandate independent infrastructure capacity studies before any upzoning

Our neighborhood demonstrates that preservation and livability are not at odds with urban vitality. Please protect Prospect Park South's unique character by exempting our historic district, and CB14 from the City of Yes TOD provisions.

Sincerely,

Chris Lindsay-Abaire



Brooklyn NY 11226

--

Chris Lindsay-Abaire



[EXTERNAL] I strongly support city of yes

Christopher Sanders < >

Fri 10/25/2024 6:48 PM

To: Land Use Testimony <landusetestimony@council.nyc.gov>;

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Just wanted to let City Council know that I strongly support the City Of Yes housing proposal, including ending of parking mandates.

Thanks,

Chris Sanders
Frontend Engineer
Sent from my iPhone

[EXTERNAL] I support lifting Parking Mandates and City of Yes: Housing Opportunity

Christian Long <>

Fri 10/25/2024 5:01 PM

Inbox

To: Land Use Testimony <landusetestimony@council.nyc.gov>;

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Hello,

I would like to register my vehement support for the lifting of parking mandates. Most of the energy and arguments against lifting this mandate are rooted in misinformation and fear-mongering. Those people are making it sound like lifting these mandates would ban parking in new developments. This is obviously false, and if developers deem that the market demands it then it will continue to get built. The arguments in favor of lifting are clear and many, backed up by lots of data as well as common sense. Since those arguments have already been laid out better than I could, I would like to just link the most recent ones here:

<https://www.nytimes.com/interactive/2024/10/21/upshot/parking-mandates.html>

<https://nyc.streetsblog.org/2024/10/22/city-of-yes-council-hears-historic-rezoning-plan>

It is particularly noteworthy that the famously car-friendly New York Times published that piece.

Thanks,
Christian Long
Brooklyn, NY

[EXTERNAL] City of Yes Testimony

Chris Mehos <>

Fri 10/25/2024 3:26 PM

To: Land Use Testimony <landusetestimony@council.nyc.gov>;

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Dear Councilmembers,

We, the undersigned residents of New York City, express our strong opposition to the proposed "City of Yes", Housing Opportunity initiative. While we support pragmatic efforts to address the city's housing crisis, we believe that this proposal could have detrimental effects on our communities due to the following reasons: 1. ****OVERDEVELOPMENT CONCERNS:**** The proposal could lead to overdevelopment, straining infrastructure such as schools, public transport, sanitation, parking, policing and emergency services which still need to be equipped to handle increased capacity. 2. ****COMMUNITY CHARACTER:**** The proposed changes could irreversibly and drastically alter the distinct character of neighborhoods, potentially undermining and changing the unique cultural and historical aspects of our city's diverse communities while affecting the property values and taxation impact. 3. ****AFFORDABILITY IMPACT:**** There needs to be more guarantee that the proposed new housing units will be truly affordable for the existing and new residents, potentially leading to displacement of lower-income families. 4. ****THE NEED:**** New York City has been losing a substantial population over the past decade. Hence, the need for additional development among neighborhoods is not justified. 5. ****ENVIRONMENTAL CONCERNS:**** Increased construction may lead to environmental issues, including decreased green spaces and higher pollution levels, which could negatively impact resident health and quality of life. ****PROPOSED ACTIONS:**** We urge city planners, decision-makers, and council members to conduct in-depth, comprehensive impact assessments with genuine community involvement, retain existing zoning regulations, and approve community boards according to existing regulations. We strongly recommend exploring alternative solutions that ensure sustainable development in suitably zoned areas, such as rehabilitating existing buildings and/or developing underutilized areas without high-density rezoning. We propose enhanced regulations to ensure any new development prioritizes affordable housing and infrastructure enhancement to support increased population density.

Sincerely,

Christian Mihopoulos

[EXTERNAL] Yes to City of Yes

Christian Skotte <

Wed 10/23/2024 9:53 AM

To: Land Use Testimony <landusetestimony@council.nyc.gov>;

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Hi -- I am a voter and a resident of NYC. I am strongly in favor of City of Yes! The modest changes would help address the existential threat that is our housing shortage.

Christian Skotte

Brooklyn

--
Christian Skotte | he/him

www.christianskotte.com


From: [Christina Bonelli](#)
To: [Land Use Testimony](#)
Subject: [EXTERNAL] City of YES
Date: Wednesday, October 23, 2024 9:21:06 AM

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To Whom it May Concern:

The City of Yes plan, a 1 glove fits all agenda, is a poor fit for our community. This proposal will put additional burden on already overwhelmed infrastructure in flood prone areas. Place stress on already overcrowded and many underperforming schools. In most situations increased population and density will jeopardize public safety. Our police force, fire department, EMS, health and human services cannot withstand additional work loads. This aggressive plan will remove parking mandates for new development projects. Our car-centric, low density R 1 - R 5 neighborhoods are already parking deprived. A housing crisis is the alleged reason for this over reaching plan. However, allowance of tens of thousands of new entrants to our city while there is a crisis is akin to strategically placing additional holes in a sinking ship. New York City cannot maintain their sidewalks Over 9,000 sidewalks damaged by tree roots await repair. The repair wait list exceeds 5 years. New York City please fix what you have before adding more. Go back to the drawing board and do a district by district assessment. Determine which fingers properly fit the gloves and bring a modified product back to the respective council members and their constituents for approval. Force feeding creates a gag reflex. This plan in its current state is not digestible for many New Yorkers. Thank you in advance for your anticipated cooperation.

Christina Bonelli



Bronx, NY 10462

Sent from my iPhone

From: [Christina](#)
To: [Land Use Testimony](#)
Subject: [EXTERNAL] City of Yes
Date: Friday, October 25, 2024 5:41:19 AM

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As a concerned registered voter of Queens County, I implore you to stand up to the one size fits all rezoning that is the City of Yes. I chose to stay in NYC rather than move to Nassau County because my area of Queens afforded me the best of both worlds. If you destroy my neighborhood with multi buildings and do not listen to most of your constituents in my area, that is the antithesis of what a government official is supposed to do. Any Council member has to see that the strength of NYC is the beauty of its diversity. There is no such thing as one size fits all. I urge you and your members to vote NO on the city of yes.

Sincerely,
Christina Hanophy Ryan

From: [Christina Wilkinson](#)
To: [Land Use Testimony](#)
Subject: [EXTERNAL] City of Yes for Housing Opportunity
Date: Friday, October 25, 2024 10:01:19 AM

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Dear Chair Riley,

I am a Maspeth, Queens homeowner and I am totally opposed to City of Yes for Housing Opportunity.

Since the first day of his administration in January of 2022, Mayor Eric Adams as well as City Planning Chair Dan Garodnick and their allies in the real estate industry have continuously been gaslighting the public about housing and development in New York City – and what the City of Yes for Housing Opportunity will do about it if it becomes law.

Let's look at some of the facts:

In 1960, the population of New York City was 7.9 million. While our population has decreased and increased significantly over the last 64 years, today it stands at less than 8 million for the first time in over 25 years – and continues to decline. The Department of City Planning insists on using census data from 2020 to justify ramming the City of Yes down our throats.

Hot off the presses, we have this summary from QNS regarding a RentCafe survey of new housing construction: “The study concluded that the New York City metropolitan area is set to have 150,327 new apartments built from 2024 to 2028 without the City of Yes. This would present a significant jump from the 116,207 completed from 2019 to 2023, which was the second-most over that span, behind only Dallas, Texas at 128,418.” We are constantly told that developers build where there is demand, and most of the apartments are in Brooklyn and Manhattan, so why exactly would Fresh Meadows or Middle Village need to build more housing, when that’s not where people want to live? Especially since we’ve seen an exodus of people from NYC since 2020?

The City of Yes Environmental Impact Statement (EIS) says that it will only create a maximum of 58,000 to 109,000 units over 15 years. And yet, most articles written over the past few months have city reps quoting that they “hope” that it will create 500,000 units over

a decade. Low-balling unit counts and population growth to justify no increase in infrastructure or services while claiming that there is a desperate need for housing is the proverbial definition of gaslighting.

New York City has over 800,000 additional units of housing as compared to 1960 with a similar population. Yet, according to Mayor Adams and his sycophants, we are in a housing crisis. We do not have a housing crisis; we have an affordability crisis and the City of Yes will do very little to nothing in addressing this.

Mayor Eric Adams told WBLS radio in August, “Sadly, of the 59 community boards, only 10 are building affordable housing. The other 49 are refusing it.” 49 community boards are “refusing” affordable housing? No, they quite justifiably are refusing to greenlight a “plan” which will usher in an era of speculation to the degree that your neighborhood – which undertook a lengthy and carefully planned contextual zoning between one and two decades ago – won’t be recognizable in 10 years.

Mayor Eric Adams and Dan Garodnick have continuously stated that the zoning we have – based on the 1961 Zoning Resolution – is outdated. The “buildout” or maximum amount of development that can occur as of right now would accommodate another 8 to 12 million people if we never, ever changed our zoning again. However, the proposed zoning in the City of Yes would bring us back to the policies and substance of the 1916 Zoning Ordinance – replacing “outdated” with positively “prehistoric” zoning, accommodating up to 55 million people only in terms of zoning, not infrastructure or other city services (schools, public safety, etc.).

Both Mayor Adams and Chair Garodnick have stated that deregulating our zoning laws will create more affordability in housing through increased supply and demand. However, as Tom Agnotti, professor emeritus of urban policy and planning at CUNY and a former planner at the Department of City Planning made clear last month in an op-ed, Long Island City has added over 30,000 units in the past two decades and the rents have increased dramatically from \$3,400 to \$5,300. This has occurred everywhere across the city where there has been increased unit count regardless of the economics or demographics of the community where housing has been built.

As-of-right zoning takes away one of the few powers that Councilmembers actually have: land use. Imagine representatives who want to have LESS say in what gets built in their neighborhood? If the City of Yes is approved, the Councilmembers will no longer have to be beholden to those pesky voters in their districts.

Speaking of demographics, both Mayor Adams and Chair Garodnick have repeatedly said that the current zoning – particularly in the lower density areas across the city – is “racist.”

How can zoning be racist when most lower density areas in the Bronx, Queens and Brooklyn – which are also the areas with the largest percentage of owner-occupied housing in the city – have populations that are also majority non-White?

Mayor Adams' and Chair Garodnick's purposeful disinformation campaign about the City of Yes rivals that of a man that they both profess to despise: Robert Moses, who constantly used the term "progress" to justify his often destructive and terrible development proposals. Gaslighting crosses party lines and political leanings all in favor of one simple truth: making Mayor Adams' friends and donors – developers and the real estate industry – much, much richer at the expense of what's left of the middle class in New York City.

The lower density neighborhoods are filled with mostly owner-occupied housing and small landlords now. Most property owners will not have the capital or the desire to add another building unit – or maybe ten, twenty or more if they are in one of the proposed Transit Oriented Development zones. However, when a developer who does have that desire and ability comes around with a suitcase full of money, a lot of blocks won't be occupied by small live-in landlords anymore because those people will cash out and leave.

My family has been here for five generations. We have only owned one home through the generations. We voluntarily provide affordable housing to two tenants at rents well below market rate so that other neighborhood people can continue to live here. If you vote no, landlords like us will become scarce, and in effect, you will worsen the affordable housing crisis rather than help it.

Please vote NO on City of Yes.

Thank you.

Christina Wilkinson

[EXTERNAL] Parking minimums

Christine Berthet <>

Wed 10/23/2024 10:36 AM

To: Land Use Testimony <landusetestimony@council.nyc.gov>;

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Please remove parking minimums. The formula cannot reflect the specificity of each building and residents demand .
Let the market decide.

Christine Berthet



From: [Christopher Volpe](#)
To: [Land Use Testimony](#)
Subject: [EXTERNAL] Support Lifting Parking Reqs
Date: Tuesday, October 22, 2024 7:06:40 PM

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Hi,

My name is Christopher Volpe and I currently live in Harlem in Yusef Salaam's district, but I was born and raised in Whitestone, Queens.

I'm writing in my support of lifting parking requirements around the city and urging city council to use every and every power they have to make our streets safer from cars.

I also want to express my serious concern for the disrespectful comments shared by my hometown CM, Vickie Paladino, in her questioning of individuals there to share information. She is a disgrace to Whitestone, to the borough of Queens, and to NYC as a whole.

As someone who spent 20 years of my life in Whitestone, driving locally or out east and cycling 14 miles each way to Hunter College when I attended (truly it was faster and more reliable than the q14 at the time, now it's the 15a, to the subway), I can attest to the fact that cars are the single most dangerous thing the average NYer faces on a daily basis - and so can the data. The majority of NYC households do not own a car, and a large portion of the ones that do like myself do not rely on them daily for commuting. Even on days when I couldn't bike to school, I wouldn't drive to the Upper East Side to attend class. I, like the majority of people in Vickie Paladino's own district, would drive to a muni lot like the one in Flushing or in Astoria and pay to park, then ride the subway in. Vickie Paladino, and the other CM's who oppose this, are removed from the reality most of us experience daily because they do not follow the rules like the rest of us have to. The rest of us do not get parking placards to abuse and illegally park anywhere we want in a city center where driving is the least efficient form of transportation. The rest of us don't get to evade tickets and tolls by driving ghost cars with fraudulent paper plates like Vickie Paladino's own son.

For those reasons, I ask you to lift parking requirements so that we can start building a city that reflects the reality of life for most of us who live in it already, even in the deepest parts of North East, Queens.

Thank you,
Christopher Volpe

[EXTERNAL] Lift parking minimums, please!

Cindy McLaughlin <

Wed 10/23/2024 9:55 AM

To: Land Use Testimony <landusetestimony@council.nyc.gov>;

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Hello!

I'm a longtime New Yorker, a Brooklynite, and a lover of this city. I'm also an environmentalist and former CEO of a zoning company. I therefore know more than the average bear about our use of space in NYC. [Here's](#) an article about parking my (since sold) company wrote during the pandemic. This might be a useful reference for your consideration.

It's long past time we eliminate any and all parking minimums, start charging market rates for on-street parking, use the funds to invest in and mode-shift people to transit, and take more dramatic measures to radically reduce the number of dangerous, polluting cars we have on our street. Our planet, our pocketbooks, our health, and our quality of life demand it.

Thank you,
Cindy

--

Cindy McLaughlin





Testimony of Juan Diaz
Citizens' Committee for Children of New York
Submitted to The New York City Council Subcommittee on Zoning and Franchises
Oversight – City of Yes for Housing Opportunity Proposal
October 22, 2024

Thank you, Chair Riley and members of the Committee on Zoning and Franchises, for the opportunity to submit testimony at this hearing regarding the City of Yes for Housing Opportunity zoning text amendments.

Since 1944, Citizens' Committee for Children of New York has served as an independent, multi-issue child advocacy organization. CCC does not accept or receive public resources, provide direct services, or represent a sector or workforce; our priority is improving outcomes for children and families through civic engagement, research, and advocacy. We document the facts, engage, and mobilize New Yorkers, and advocate for solutions to ensure that every New York child is healthy, housed, educated, and safe.

CCC is a steering committee member of the Family Homeless Coalition (FHC), a coalition comprised of 20 organizations representing service and housing providers, children's advocacy organizations, and people with lived experience with family homelessness. We are united by the goal of preventing family homelessness, improving the well-being of children and families in shelter, and supporting the long-term stability of families with children who leave shelter.

The City's 1.4 percent vacancy rate and serious lack of affordable housing units make it extremely difficult for families with children to find stable housing. Furthermore, [CCC's Keeping Track of Children](#) data book revealed that in FY23, over 46,000 children resided in City shelters and the average length of stay was 437 days for families with children in shelters. Long shelter stays can permanently impact a child's educational and overall well-being.

We applaud the City Council's effort to expand the conversation and call for additional solutions to alleviate the current shelter and housing access crisis and pair them with necessary increases in supply and zoning flexibility. **We urge the City Administration to take the following steps to expedite housing placement and prevent homelessness. Fully Implement the CityFHEPS Reform Package:**

- **We urge the City Administration to fully implement and fund the CityFHEPS expansion** which would reduce unnecessary shelter costs and significantly reduce

homelessness for families with children. CityFHEPS package, would remove the shelter stay and housing eviction court histories to qualify, among other reforms.

Invest in Prevention and Aftercare Services:

- **Increase the Budget for Homebase Providers by \$37.9 million to a total of \$100 million.** Since the pandemic, Homebase providers have taken on tremendous increases in caseload as well as an ever-expanding set of responsibilities. This has not been accompanied by funding levels to match the new post-Covid reality. As a result, wait times have increased for critical Homebase services like help with eviction prevention, emergency rental assistance and obtaining benefits.
- **Establish a Dedicated Funding Stream Strictly for Aftercare Services.** Establishing a strict separate funding stream for this essential work will ensure organizations can properly dedicate staff and tailor programming to increase housing stability. Families who are placed in permanent housing from shelter require time limited support to avoid recidivism in homelessness.
- **Release an RFP and Dedicate Funding for Organizations Beyond Homebase Providers to Process CityFHEPS.** Legal services organizations who have taken on this role on a temporary basis have been successful in speeding up processing times and reducing the overall burden on the system of processing CityFHEPS applications. By opening this opportunity for other organizations, further will reduce strain on Homebase providers and expedite CityFHEPS application processing.

Reduce Barriers in Voucher Administration

We applaud the recent streamlining measures and reforms that have been implemented in homeless placements, voucher administration, and NYC Housing Connect lease-up. However, further steps are needed to expedite placement and meaningfully reduce family homelessness.

- **Improve apartment inspections by:**
 - Adopting NYCHA's approach to inspections, which prioritizes significant health and safety issues but allows for smaller issues to be rectified after tenant move-in.
 - Reforming the Double Inspection Rule, which requires a DHS inspection (cellars and ground floor units), DSS requires both a DHS and a separate HRA inspection. We call for the secondary inspection to be limited to a fraction of the units as a secondary review/audit procedure but not policy for every unit.
- **Adopt the \$100 Rule:** The income presented in a voucher package must be within \$100 of the original shopping letter amount. With low-income tenant incomes often varying greatly week by week, this discrepancy often triggers a rebudgeting letter, which is a source of delay. If the income qualifies at the time of the voucher package, it should be approved without rebudgeting.
- **Modify the Public Assistance Single Issue Timeframe:** The single issue, which is granted by HRA staff that is assigned to public benefits assistance, provides a window of time for the optimal processing of CityFHEPS application approval. The current time

frame is 30 days but often the process for applying and getting the voucher is longer and requires a single issuance to be resubmitted. We recommend a 90-day time frame.

Additionally, we encourage the City Administration to continue to improve housing placement and invest in agency staffing within benefit access and housing assistance units at HPD, DHS and HRA.

Thank you for your time and consideration.



18 September 2024

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City of Yes for Housing Opportunity

Since 1892, The City Club has been a civic organization advocating for sound urban policies for all New Yorkers. The City Club of New York promotes good governance and urban planning responsive to the needs of our communities.

We oppose the City of Yes for Housing Opportunity proposal as it is currently formulated.

There is much in COYHO that could improve the city. Reducing required parking would make housing less expensive to build, although parking may still be needed in areas less well served by transit. TOD, increasing density appropriately near transit stations, puts development where it supports transit and transit supports it. Encouraging mixed use -- housing above retail -- on commercial streets serves both residents and businesses thus enhancing land use. Accessory dwelling units are likely to provide some inexpensive housing and benefit existing homeowners.

However, the fundamental disappointment of COYHO is that, despite what one is encouraged to believe, this is not an affordable housing program; it is a housing development program. It will not produce a little development in every neighborhood; it will produce denser development in neighborhoods where the market is already functioning well and, in that process, demolish existing less expensive housing in older and rent regulated buildings. There is no guarantee that affordable housing will result.

In our testimony on the scope of work for the environmental review of COYHO we recommended an alternative to the proposed action. We were concerned that increasing FAR and relaxing envelope controls to fit the additional zoning floor area would result in new buildings not consistent with their built context to the detriment of neighborhood character and urban design. That alternative would mandate a percentage of affordable housing be included in developments without granting additional FAR or other regulatory incentives to pay for it. This is done in other jurisdictions and should have been examined here.

If COYHO is to lead to a better city it needs to consider such issues.

From: [JOHN SHAPIRO](#)
To: [Land Use Testimony](#)
Cc: [Straughter, Perris](#)
Subject: [EXTERNAL] - City Club Waterfront Committee
Date: Friday, October 25, 2024 10:39:16 AM

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To the members of the City Council:

The City Club of New York has adopted a position concerning discretionary rezonings in the future floodplain of New York City.

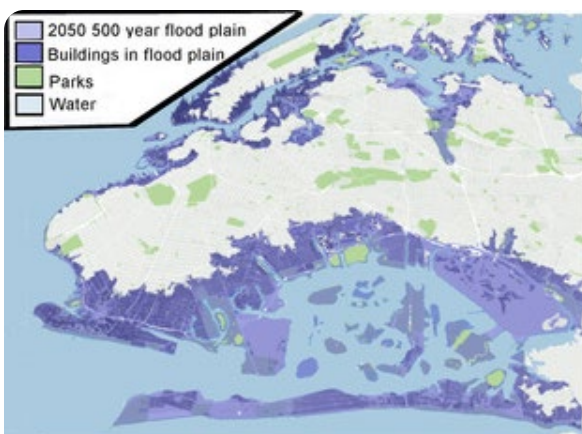
The City of Yes differentiates regulations in the current floodplain instead of the future floodplain as of 2100.

The Waterfront Committee of the City Club of New York urges the City Council to **amend the City of Yes proposal to employ the projected floodplain** instead of the current floodplain, which is obsolescent.

Below is a link to the City Club's official position on upzonings and incentives in the future floodplain.

Thank you for your consideration.

On behalf of the Waterfront Committee,
John Shapiro, Co-Chair (with Tom Fox)



Partial Moratorium: Residential development in

MEMBERS of the WATERFRONT COMMITTEE

Alice Blank
Sally Bowman
Rob Buchanan
William Calabrese
Aaron Ford
Robert Feudenberg
Clay Hiles
Sam Jackson
Klaus Jacob
Alice Miller
Walter Rodriguez Meyer
Tyler Taba
John West

From: [Clara Duffy](#)
To: [Land Use Testimony](#)
Subject: [EXTERNAL] City of yes
Date: Wednesday, October 23, 2024 5:56:31 AM

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To whom it concerns:

I'm a resident of the Upper West Side and strongly support lifting parking mandates citywide. The City of Yes reforms will be largely ineffective if this measure is not included. It has been proven repeatedly that parking mandates raise the cost of housing, and are an inefficient way of determining where parking should be allocated. Cities across the US have already led the way and seen the benefits from making this change, and there's no reason New York can't as well. Let's not hold this city back with outdated planning ideas!

Clara

CLAUDIA R. VALENTINO
PRESIDENT
FOREST HILLS COMMUNITY & CIVIC ASSOCIATION

October 22, 2024

Testimony on City of Yes/Housing – City Council Zoning and Franchises Committee

Dear Committee Chair Riley and members of the City Council,

Thank you so much for holding the hearing today on City of Yes for Housing Opportunity. As always, you showed enormous courtesy to everyone who testified over the course of more than 15 hours. I watched all of it and I thank you for your professionalism and decency.

I testified on Zoom, but have expanded my statement, below. This is a bit of history, but also a statement of sentiment, of how I feel personally, and why I believe City of Yes/Housing must be rejected. I and the people I know who own small homes here feel that we need to say who we are and what we stand for since we have been accused of so much, and so personally.

My name is Claudia Valentino and I am President of the Forest Hills Community and Civic Association. I have worked with the Civic for some 30 years and during my involvement we have looked out for the concept of community review.

When we were fighting Rudy Giuliani's Comprehensive Retail Strategy in the 90s, which gave a blank check to developers to place retail on the 51 M1 Light Industrial sites around the city, we fought both a mall and a 26-screen multi-plex theater on the site on Metropolitan Avenue and held out for 15 years to get schools built. The MELS campus stands there today. Community review achieved that.

One of our early requests was that, instead of a mall, that housing be built for seniors and veterans who make up, and made up then, a high proportion of our homeless population. The days of mall shopping were over and any mall built there was destined to fail. So we asked for housing instead, but were ignored. Developers wanted to build whatever they chose and since it was “as of right” the broad belief was that it was pointless to oppose them. But we decided we had strong grounds for fighting anyway. We’d looked into our infrastructure and got a sense of how fragile it was. That knowledge ultimately informed our decision to downzone our area since the land occupied by the houses was just as much at risk and at capacity and we desperately wanted to preserve neighborhood character and quality of life – both of which were regarded as legitimate aims by the Department of City Planning. We hadn’t even yet begun to experience our now tropical-style rainfall amounts.

At that same time, we made the acquaintance of a number of city activists at hearings, joined them and testified against red-lining going on in Harlem, on an M1 site there, that was depriving the neighborhood of a much-needed supermarket. Again, the fundamental issue was community review which all neighborhoods have the right to. The developers had an interest in our Forest Hills site, but could care less about Harlem which had not yet been provided with the variety of

retail opportunities you see today. People barely had any stores to shop in locally. They knew their area and what it needed and we supported that.

At that time, I and Barbara Stuchinski, then-president of the Forest Hills Community and Civic Association, were given awards by Mr. Kim, president of the Small Business Congress, for standing up for individual business owners, bodegas, Korean groceries, and small supermarkets. Big box was threatening to eat them all alive. All of this should tell you where our hearts lie and what our consistent principles are about. We are not as we have been characterized.

Now we are faced with City of Yes/Housing. Ironically, it comes at us in our neighborhoods the same way the 160+ - page Comprehensive Retail Strategy, authored by Giuliani and his developer campaign contributors, did. Only this time we are dealing with thousands of pages of one-size-fits-all policy. We've seen it before. It is a crude tool. And it won't work. It will not help with affordability. Nor will it house people. It doesn't do enough, quickly enough, and yet singles out one- and two-family neighborhoods as the target and cause of those problems. Nor does it spare our small, mon-and-pop shopping streets.

Again, David and Goliath. It seems never to change.

My Civic association, which, in the narrowest sense can be seen as representing the area bordered by Union Turnpike, Ascan Avenue, Booth Street, and Selfridge Street, is completely opposed to City of Yes for a number of reasons. First, it removes community review which must be a fundamental right of all neighborhoods. People in communities know their communities best. They are wise and knowledgeable about infrastructure, flooding, city services of all kinds, and neighborhood character. Not to mention availability/shortages of school seats and other city services. We understand capacity – and we're beyond that now.

City of Yes comes to us from the west coast and it is a product of academic, theoretical systems of thinking that the urban planning community has embraced. Social media has only inflamed the situation further. Those theories, incredibly, have been stated as a way of “de-colonizing” one- and two- family neighborhoods. That abstract, theoretical, academic work has now become political theater. Too many among us have taken up that cry.

It must be emphasized that this is not a New York City plan. In actual fact, places around the country have lot sizes for homes that are far larger than ours here in New York. So the plan's provisions that allow apartment buildings in transit zones and that allow ADUs on one- and two-family lots, is a mis-fit for us here. Those apartment buildings will sit next to people's small homes. Those ADUs will sit in the backyards, or in the garages, of our small-home neighborhoods. All in the name of “urbanizing” us. We don't want it.

Worst of all, the accusations and finger pointing have trickled down and were repeated endlessly at the hearing on October 22. Over and over – incredibly from young people, newcomers from places like Cincinnati, Minneapolis, Austin, Texas – our resistance to City of Yes was seen as a complaint from an exclusive, self-centered, self-interested, well-off, white, population. Incredible. None of them have ever walked my Queens neighborhood, or those in the Bronx,

Brooklyn, or Staten Island, to see how our houses are sited, or even who we are, what we look like, and how we have struggled to remain here in New York ourselves.

What is not addressed is what it would be like to own a small home, let's say one like mine, 16 feet wide on a 25 foot wide lot, and suddenly have the garages around you occupied, or have ADUs added to adjacent backyards, etc. What would it look like to have construction going on that dug up the common driveway between homes, to bring water, sewer, and electrical lines to a backyard? What about the fact that these homes are nearly 100 years old, as are our trees. And what of our foundations, most of which are cinder block? What of the potential for structural damage to surrounding homes, adjacent homes? And what of the increased fire risk? Backyard fires have long been on the fire department's list of things they dread most because the homes are so tightly situated together.

All of this goes double for construction of an apartment building directly adjacent to homes.

We did not buy our homes with the idea that any of this was likely. In fact, we would not have ever situated ourselves next to it, or to the increased density it would bring and lack of privacy and light.

In addition, when it comes to the small shopping streets, such as ours here on Metropolitan Avenue, adding two stories to those existing buildings would be catastrophic. First, and I have confirmed this, the mom and pop businesses that run from Woodhaven to Ascan do not own the buildings they are in. Only a small handful do. A building owner can decide to add the two stories. That puts the small business out permanently and puts the tenants in the affordable apartments above out permanently. It also digs down, again, into 100-year-old sewer, water, and electrical lines, ties up the street, impacts the businesses and tenants in surrounding buildings, and costs a lot of money. The new business tenant and the residential tenants will have to be paying at least market rate for their spaces to offset the cost of construction. The entire street will be disrupted for foot and car traffic, affecting our shopping street as a whole -- a street that has struggled to remain viable through recessions and most recently, Covid. Lastly, don't listen to me. Listen to Columbia University which has issued a report that says that upzoning is likely going to lead to gentrification. We here in Queens, in the little back, southern end of Forest Hills, with our Archie Bunker houses, do not want to be turned into Williamsburg. Williamsburg has become unaffordable. It also is too crowded. Let those who love it live there. Allow us to live here and have our neighborhoods remain intact.

Now, worst of all is that our houses and our so-called "exclusionary" zoning have been identified as the "cause" of homelessness and lack of affordability. This is not only false, it is divisive and dangerous rhetoric. It also breaks our hearts, breaks us as New Yorkers. This is not an easy city to claim as your home. People stay here through thick and thin out of love for New York, its vibrance, and diversity. It is important that we keep faith with one another.

This is not Oregon where the statistics tell us that the population of their one- and two-family neighborhoods are 85% white. Mayor Adams has said on Brian Lehrer's show that the one major reason for City of Yes is "integration." Oregon has that problem. Queens, Brooklyn, the Bronx, and Staten Island, do not.

Now, just as serious is the absolute fact that we have an affordability problem and a shortage of housing. Simply because we oppose the methodology of City of Yes does not mean we are not aware. People – on both sides – said over and over on October 22 that the problem was a real one. It absolutely is.

However, the bottom line is that the rollout of City of Yes is presented as taking 15 years. Some say ten. Emergencies and crises are not solved over 15 years. They must be addressed immediately. We know -- thanks to the zoom meeting between homelessness officials in Houston and their counterparts in NYC organized last May by the architecture critic for the New York Times, Michael Kimmelman, that the idea is to create a voucher system for the purpose of housing the homeless. Garage units and backyard ADUs are not for anyone's mom. They are for the homeless. Shams de Baron, speaking on the steps of City Hall, alongside Mayor Adams and Dan Garodnick, wants the \$3.7 billion shelter system to be dismantled and City of Yes ADUs to house the homeless using a voucher system.

Houston and New York City, in that meeting, both agreed that the character of homelessness in each place is entirely different. We here have people who are drug or alcohol addicted and who also can be suffering from mental illness. How is any landlord who is housing one of these people supposed to be the first line of support for the kinds of problems they have? It is unfair to both parties.

The shelter system is indeed appalling.

So, as I have said in every venue at which I have spoken, rather than accepting that the City of Yes/Housing will help any of the 70,000 homeless we have just in Queens, not to mention the rest of the city, or any of the people just starting out and trying to find a rentable apartment, I say please let's get better minds on this and find other ways to get the homeless into decent housing, with services, and create affordable housing for our fellow citizens.

I will repeat that when the M1 property, that I referred to at the beginning of this statement, was being slated for a mall, I asked why we couldn't have affordable housing built for seniors so that they might sell their homes which had become unmanageable, and move within their own neighborhoods and have the same friends, houses of worship, stores, hair salons, etc. And why couldn't we have housing built for our veterans, too, who make up a big proportion of the homeless population. Well, that was about 30 years ago. We had 51 M1 properties in the five boroughs, but no one was interested.

So I say now -- we must still have tracts of land that could be put to these uses and quickly. I suggest getting the FEMA trailers, which sit unused. And I suggest getting mobile home and tiny house manufacturers, and the companies that take shipping containers and make beautiful apartments out of them to build housing, now. Not in 15 years, but now. Create new neighborhoods. Build schools and other necessary arms of community life. The M1 sites are always adjacent to transit and to other services, such as moderate retail. Yes, there will be a whole different kind of outcry. There were people who didn't want school construction going on

when we got the three schools built finally on our M1. But we need schools and people need homes.

Studies have shown conclusively that a homeless person given their own place, with a bedroom, a kitchen, a bathroom, and privacy, has, within three months, a dramatic improvement in their mental health. And people need a leg up financially. So let's have affordable mortgage plans for the mobile homes and container homes. (I nearly moved into one of these myself not too long ago in another state -- they're really nice and inexpensive, but a death in my immediate family prevented that move.)

The State and Federal governments are ready with grant money and loans for the ADUs. Money is being thrown at the city by everyone and with both hands. A Harris Administration would do the same. Shams de Baron is carrying on about diverting the shelter system moneys to ADUs. So, money is going to be spent. Why can't we spend it on something nice, and fast, instead of cracking our neighborhoods apart piecemeal for very little benefit to the people who need it?

Please – vote NO. We can do better. Much better.

I thank you again for your kind attention. October 22 was a marathon!

Sincerely,
Claudia Valentino
President
Forest Hills Community and Civic Association



From: [Cleo Dana](#)
To: [Land Use Testimony](#)
Subject: [EXTERNAL] City of Yes
Date: Friday, October 25, 2024 8:55:40 AM

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Vote No.

Not only does this lengthy document not mandate affordable housing, it takes away public input to community development by weakening ULURP and giving unprecedented power to CPC, essentially Mayor's picks.

Say Yes to more open spaces, say NO to infill proposals.

From: [Clint Okayama](#)
To: [Land Use Testimony](#)
Subject: [EXTERNAL] City of Yes Written Testimony
Date: Thursday, October 24, 2024 10:21:44 PM

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From: Clint Okayama
Regarding: City of Yes

This written testimony opposes the City of Yes as it is currently written. While there are aspects of the City of Yes that will help curtail NYC's affordability crisis and housing shortage, I strongly advocate that the required Universal Affordability Preference AMI levels be lowered to at most 40% AMI.

The Universal Affordability Preference will add to the supply of housing; however, the required affordability levels must be far lower than 60% AMI to help New Yorkers. Currently, a one-person household who earns a 60% AMI salary in NYC makes \$65,220 per year. This is far higher than the incomes of individuals who truly need more affordable housing options: seniors who are on fixed incomes, recent graduates, households with illnesses, single parents and many others. Arguments that suggest a "trickle-down effect" on more affordable units are not realistic, particularly since the vacancy rate of all housing is so low and UAP will only add a relatively small amount of additional units.

Furthermore, by providing truly deep affordability, the city will prevent government costs in the long run due to the prevention of homelessness, social services and the wide variety of healthcare needs that are tied to housing insecurity. NYC's Housing First program, created three decades ago, proved that providing permanent housing to those in need is financially beneficial to the city due to decreases in hospitalization rates (which cost \$3,609/day - see Tsemberis and Eisenberg, 2000) as well as decreases in costs for incarceration, shelter housing, supportive housing and more.

Perhaps most importantly, these housing-insecure households will have a good home.

We need a city that provides homes for those who are most vulnerable. We need low rent levels that will allow households to achieve long-term savings. Not only do we want it for ourselves, but providing inexpensive housing to individuals who are housing-insecure is simply the right thing to do. Creating a deeply affordable city is a legacy that we can all be proud of, and we will be financially empowering NYC at the same time.

Therefore, I strongly urge the mayor and city council to lower the affordability requirements of the Universal Affordability Preference from 60% AMI to 40% AMI.

Thank you for your consideration,
Clint Okayama

[EXTERNAL] City of Yes for Housing Opportunity

Connie Murray <

Fri 10/25/2024 9:53 PM

To: Land Use Testimony <landusetestimony@council.nyc.gov>;

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Dear Planning and Land Use Committee for the New York City Council,

This is my third attempt to email my testimony to you, I hope this email gets through to you all.

I appreciate this opportunity to ask you to vote against the City of Yes for Housing Opportunity because it is nothing more than a giveaway to real estate developers which will not result in the creation of any housing that will help any deserving New Yorkers.

New York City does not have a housing crisis: we have a housing affordability crisis with no dearth of viable, available units.

A one-size-fits-all approach is not an appropriate strategy for our diverse city. As well, New Yorkers deserve the full democratic process of community input and public engagement meetings.

NYC's current zoning, if never changed again, can accommodate 16 to 20 million residents; our city has also lost 800,000 residents in the past six years and our total population is less than 8 million people for the first time in three decades.

NYC now has the same number of residents that we had in 1960 but we now have 800,000 more residential units that we had back in 1960. We don't need to build more.

What we need to do is track vacancy; that's what we should be saying yes to. Let's start in Queens, where I live: let's find out exactly how many available units are in Long Island City, in Flushing and in Jamaica, especially in the scores of new luxury towers.

A year ago, I wrote about how not being able to say "no" isn't the solution for our incredible city; we deserve better: [The Real Cost of a City of Yes and Nothing But Yes](#)

If you are not permitted to reject bad ideas or to speak your mind or never say "no," then you're in an abusive dynamic. As a female, I need to be able to say "no" when something is wrong and does not feel right or just, in civic issues just as much as in personal situations.

Negotiation and giving feedback are necessary parts of democracy, please do not take that away from this city's constituency.

The Real Cost of a City of Yes and Nothing But Yes

When it comes to Innovation QNS, the only answer is no

Our corrupt Mayor Eric Adams needs to resign.

And he needs to take a City of Yes with him.

I appreciate your time and attention to my testimony, this is very important to me,

Thank you,
Connie Murray
Long Island City, NYC

[EXTERNAL] Please vote YES on City of Yes.

Conrad Gartz <



Wed 10/23/2024 2:34 PM

Inbox

To:Land Use Testimony <landusetestimony@council.nyc.gov>;

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Please vote YES on City of Yes.

Parking should NOT be mandated. It should be up to the project to provide if there is a need and is financially feasible on its own.

The downzoning of the 2000s was too extreme and stifled housing construction. This protectionism by existing New Yorkers with secure housing has caused me financial hardship through increased prices.

City of Yes is a start to reversing that protectionism. Please vote YES.

Thanks, Conrad

 Brooklyn, NY 11232

--

Conrad Gartz AIA, LEED BD+C



From: [Courtney Adrian](#)
To: [Land Use Testimony](#); [Hanif, Shahana](#)
Subject: [EXTERNAL] Vote yes on City of Yes for Housing Opportunity
Date: Thursday, October 24, 2024 3:06:53 PM

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Hi City Council,

I don't have a lot to say besides that I hope you vote for this rezoning. The city needs to build 800,000 units of new housing over the next few years and I feel we can't afford to not do this. Also, I'm really looking forward to getting rid of parking minimums. I hope the city continues to look to do rezoning as a free way to get more housing without having to put up any City money.

Doing a re-zoning is like creating new land to build on in NYC. It's weird to have to think of our housing problems in terms of land scarcity because almost nowhere else in the country has that problem, but we do. I think this rezoning and future ones will really help alleviate the crisis.

Thanks for reading,
Courtney Adrian


Brooklyn NY 11215

[EXTERNAL] NO to City of Yes

Cristine Briguglio <

Fri 10/25/2024 3:17 PM

To: Land Use Testimony <landusetestimony@council.nyc.gov>;

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WE DON'T WANT THIS PROPOSAL.

WE THE PEOPLE SAY NO TO CITY OF YES!

Cristine Briguglio



[EXTERNAL] Testimony in support of City of Yes

Dan Bianco <[REDACTED]>

Wed 10/23/2024 10:29 AM

To: Land Use Testimony <landusetestimony@council.nyc.gov>;

Cc: qn06@cb.nyc.gov <qn06@cb.nyc.gov>; District29 <District29@council.nyc.gov>;

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Hello. My name is Dan Bianco and I am a resident of Forest Hills, CB6. I am writing in support of City of Yes.

City of Yes is a contextual and incremental approach to help address the City's housing problem. It does not introduce building forms where they would be in conflict with the surrounding neighborhood. It allows for infill development of low-rise mixed-use apartment buildings in areas where those buildings already exist. It promotes low-rise development in areas explicitly served by the subway system. Exactly where we want development to occur.

The Universal Affordability Preference is the part of COY that has the potential to add the most housing. But again UAP is itself contextual and incremental. Contextual in that it provides an FAR bonus to multifamily buildings developed in R6-R10 neighborhoods where multifamily buildings are already the norm - and this FAR bonus is required to be 100% affordable. And incremental in that UAP is really only going to be applied to vacant lots in R6-R10 zones - which are not common... as an example, in Queens CB6, there are only a handful of developable lots in R6-R10 zones. The most famous of which is the Parkway Hospital site, a notoriously difficult site to develop.

I feel that a large portion of the testimony against COY echoes the types of criticisms we heard against Obamacare: when you look at what COY actually does and where it applies, almost all of the hypotheticals about neighborhood destruction don't make sense. Whether this is willful ignorance or a failure on DCP's part to provide enough illustrative examples of the application of COY, I cannot say.

And finally, I would like to speak to a specific condition my CB placed upon the ADU zoning proposal. The requirement that the homeowner has to bring their entire home in compliance with current energy code is unduly onerous. This would immediately kill the ADU initiative. Homeowners are already incentivized to update their homes in response to utility costs and available utility rebates and incentives.

Thank you,
Dan Bianco



Forest Hills, NY 11375

P.S. I have been living in New York City since 2006. I hope that is enough for Councilmember Paladino.

From: [Daniel Cohen](#)
To: [Land Use Testimony](#)
Subject: [EXTERNAL] As an NYC resident, I support City of Yes.
Date: Wednesday, October 23, 2024 8:02:42 AM

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I live on the Upper West Side and I support City of Yes because my rent is too damn high. We need to build more housing to increase supply and match demand, and City of Yes will do exactly that.

Thank you,
Daniel Cohen

[EXTERNAL] City of Yes Zoning for Housing Opportunity

Daniel Gilkeson <>

Wed 10/23/2024 2:32 PM

To: Land Use Testimony <landusetestimony@council.nyc.gov>;

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My name is Daniel Gilkeson and I have been a resident of Brooklyn since July 2023. I am writing to register my SUPPORT for the City of Yes and eliminating parking minimums. This city desperately needs more housing built to address the housing crisis we are experiencing. Parking minimums put an onerous requirement on developers in a city with the best public transit in the country which a majority of residents depends on as their main source of transportation within the region.

If my hometown of Saint Paul, Minnesota can eliminate parking minimums there's no reason why New York City, the GREATEST CITY IN THE WORLD cannot. Let's say YES to more housing, more neighbors, and a more affordable NYC. City of YES is supported by the vast majority of residents. let's do this!

Thank you,
Daniel Gilkeson

From: [Daniel Paolino](#)
To: [Land Use Testimony](#)
Subject: [EXTERNAL] City of Yes for Housing Opportunity - Support
Date: Thursday, October 10, 2024 2:48:12 PM

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Hello,

I'm writing in support of the City of Yes for Housing Opportunity. I live in Bayside, NY where we would greatly benefit from this proposal by allowing more dense housing around transportation such as the LIRR, and around commercial areas. We desperately need to increase the amount of housing across the city, and this proposal is a good first step in doing so. Our housing costs have increased drastically, and the best way to combat that is by reducing zoning restrictions, removing mandatory parking in new constructions, and building more housing.

Thank you,
Daniel Paolino

From: [Danielle Tropiano](#)
To: [Land Use Testimony](#)
Subject: [EXTERNAL] Cars
Date: Tuesday, October 22, 2024 11:59:50 PM

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Hello! Please leave our cars alone. We shouldn't have to limit the amount of parking we have either.

[EXTERNAL] The City of Yes Plan



Wed 10/23/2024 10:38 AM

To: Land Use Testimony <landusetestimony@council.nyc.gov>;

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The City of Yes plan, a 1 glove fits all agenda, is a poor fit for our community. This proposal will put additional burden on already overwhelmed infrastructure in flood prone areas. Place stress on already overcrowded and many underperforming schools. In most situations increased population and density will jeopardize public safety. Our police force, fire department, EMS, health and human services cannot withstand additional work loads. This aggressive plan will remove parking mandates for new development projects. Our car- centric, low density R 1 - R 5 neighborhoods are already parking deprived. A housing crisis is the alleged reason for this over reaching plan. However, allowance of tens of thousands of new entrants to our city while there is a crisis is akin to strategically placing additional holes in a sinking ship. New York City cannot maintain their sidewalks Over 9,000 sidewalks damaged by tree roots await repair. The repair wait list exceeds 5 years. New York City please fix what you have before adding more. Go back to the drawing board and do a district by district assessment. Determine which fingers properly fit the gloves and bring a modified product back to the respective council members and their constituents for approval. Force feeding creates a gag reflex. This plan in its current state is not digestible for many New Yorkers. Thank you in advance for your anticipated cooperation.

Thanks

Danny D'adamo



Bronx NY 10469

[EXTERNAL] Vote YES on City of Yes!

Darryl Granger <[REDACTED]>

Fri 10/25/2024 8:34 PM

To: Land Use Testimony <landusetestimony@council.nyc.gov>;

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Dear Esteemed Council,

My name is Darryl Granger. I am now a resident of Astoria after living in Manhattan for three years. The reason I now live in Queens is I can no longer afford Manhattan.

There is one reason for this, a housing shortage. We do not build enough housing. As a result the city's vacancy rate is only 1.4% which means landlords have all the leverag to raise rents as high as they want.

To dilute the landlords' power, we need to introduce new competition by building more housing. My current neighborhood of Astoria does a good job of this. In fact, I live in a brand new building. That means I didn't displace anyone by moving into this community, a home was built for me.

We need much more this city-wide if we're ever going to lower rents for lower-income people.

Thank you for your time.

Darryl Granger
Astoria, Queens.

[EXTERNAL] I support lifting Parking Mandates and City of Yes: Housing Opportunity.

Dave Johnson <[REDACTED]>

Fri 10/25/2024 2:39 PM

To: Land Use Testimony <landusetestimony@council.nyc.gov>;

[REDACTED]

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Hi All,
I am a 69yr old long-term resident of NYC who bikes daily. I see no need for more parking spaces in NYC. On the contrary, we should be discouraging driving and car ownership in the city.

Please vote for lifting of this absurd requirement.

Dave Johnson

[REDACTED]

New York, NY 10017

[REDACTED]

[EXTERNAL] In support of removing parking mandates

D



Wed 10/23/2024 12:25 PM

To: Land Use Testimony <landusetestimony@council.nyc.gov>;

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Hi,

I am emailing to **support** removal of parking mandates.

I currently live in PLG next to a large plot of land about to be developed into 9-story housing. The building is required to build 67 parking spaces (for a mere 153 dwelling units). A similar building close by has a parking garage that is more than 50% empty because demand is low.

My neighborhood is majority car-less - we rely heavily on public transit, walking and biking - yet experience terrible traffic congestion, slow bus speeds and pedestrian accident rates.

We don't need 67 extra parking spaces. We don't need more space for cars where there is no local demand for car space.

Thanks,
David

From: [David Danzig](#)
To: [Land Use Testimony](#)
Subject: [EXTERNAL] City of Yes for Housing Opportunity
Date: Wednesday, October 23, 2024 5:19:45 PM

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I am opposed to the City of Yes plan. While the idea of more affordable housing is laudable, in practice the plan creates too many opportunities for developers to build large scale developments in areas that are not equipped to handle them. This is especially true in Victorian Flatbush, a unique neighborhood that should not be turned over to developers.

David Danzig, Brooklyn

From: [david feingersh](#)
To: [Land Use Testimony](#)
Subject: [EXTERNAL] Vote no on the city yes
Date: Friday, October 25, 2024 9:31:35 AM

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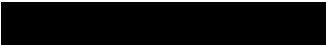
From: [David Foell](#)
To: [Land Use Testimony](#)
Subject: [EXTERNAL] City of Yes for Housing Opportunity
Date: Wednesday, October 23, 2024 4:31:21 PM

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I support the elimination of parking space mandates for new apartment buildings in NYC.

--

David Foell



[EXTERNAL] In Support of City of Yes for Housing Opportunity

David Gordon <[REDACTED]>

Fri 10/25/2024 2:55 PM

To: Land Use Testimony <landusetestimony@council.nyc.gov>;

Cc: District2 <District2@council.nyc.gov>;

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Thank you to the city council for hearing the many opinions expressed at Monday and Tuesday's hearings.

I want to reiterate my support for passing the City of Yes including all of its planks, especially removing parking minimums. Reforms like these will make it easier for young people like me to stay in New York.

I am a resident of the Lower East Side. My address is [REDACTED] New York, NY 10002.

Best,

David Gordon

[REDACTED]

From: [David Holowka](#)
To: [Land Use Testimony](#)
Subject: [EXTERNAL] David Holowka's testimony on City of Yes for Housing Opportunity
Date: Wednesday, October 23, 2024 12:59:07 AM

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I am David Holowka, a Chelsea resident, community board member and architect.

I first heard the term “teardown” years ago in reference to Fairfield County ranch houses that were being bought for replacement with mansions. The practice increases bulk and housing costs without adding housing. City of Yes will do just that for New York to the extent that it makes existing apartment buildings more rewarding to tear down. We’ll get less housing, not more, as older apartments built for ordinary people are bulldozed to make way for much larger apartments for the rich, aimed at international, second-home, and investor markets. That’s already happening in neighborhoods like the Upper East Side which has been *losing* housing units even as new apartment buildings are added.

The poster child for this effect may be 220 West 57th Street, the Billionaire’s Row near-supertall that replaced a mere 20-story building that had about the same number of apartments—a third of them rent stabilized. In the absence of vacant lots, developers will profitably vacate buildings with buyouts.

City of Yes will throw gasoline on an ongoing bonfire of affordable housing. In most of Manhattan and much of Brooklyn, market rate means luxury. That’s why even City of Yes’s optional affordability preference is a losing proposition. A new building that’s 80% luxury and only 20% affordable—and affordable as dubiously defined by AMI at that—would have a far higher median apartment cost than almost any building it would replace. That doesn’t even factor in the cost in light, air, climate impact, and quality of life.

The self-defeating and dangerously naive parts of City of Yes that put a target on the back of existing affordable housing deserve a thumbs down.

Thank you.

[EXTERNAL] Parking limits have got to go!

David Lublin <

Wed 10/23/2024 10:22 AM

To: Land Use Testimony <landusetestimony@council.nyc.gov>;

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Hi!

My name is David Lublin, I grew up in Brooklyn, lived upstate in Troy after college, and moved back here about 12 years ago.

Growing up, I always rode the bus and subway. When I lived upstate, I begrudgingly got a car. When I moved back to NYC, I was beyond happy to trade in my car for a Metrocard.

NYC is currently facing a housing shortage. We also have far too many cars on the road. Pedestrian accidents are at an all time high. Ambulance response time is getting slower and slower because of congestion across the city.

The existing parking limits mean that solving the housing crisis will only make the problem of too many cars worse. We will have more congestion. More smog. Higher asthma rates. Slower Emergency vehicle response times.

I am begging the city council to focus on improving public transportation, getting cars off the roads, and removing the parking limits on new construction is a key part of this future!

Thank you for your time.

David Lublin
Park Slope, Brooklyn

From: [David Pambianchi](#)
To: [Land Use Testimony](#)
Subject: [EXTERNAL] "City of Yes"
Date: Wednesday, October 23, 2024 6:43:35 PM

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In the news:

https://newsblaze.com/usnews/politics/scam-nyc-affordable-housing_195886/



The #1 SCAM: The NYC Affordable Housing Development "City of YES" - NewsBlaze News

Queens Community Board 5 met for a proposed affordable housing re-zoning scam the City of New York plans to ram down the throats of citizens.

newsblaze.com

Thank you,
David Pambianchi

[EXTERNAL] Re: City of Yes Testimony

David Pecoraro <

Tue 10/22/2024 10:43 PM

To: Land Use Testimony <landusetestimony@council.nyc.gov>;

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Adding my preface to my prior written submission:

To paraphrase Minnesota Governor Tim Walz, I urge who seek to impose the existential burdens of the City of Yes on Community Boards like mine who have UNANIMOUSLY rejected this disasterous proposal contained in the City of Yes to mind your own darned business.

[Sent from AOL on Android](#)

On Tue, Oct 22, 2024 at 12:02 PM, David Pecoraro

 wrote:

Good Morning:

I want to first thank the Councilmembers and staff present today for their time and attention.

I hope that you have listened to your Civic Associations, the homeowners who have voted for you and who pay your salaries with their hard earned tax dollars, as our Councilmember Selvena Brooks-Powers has done in Rosedale. I hope you also listen to UNPAID members of the Community Boards like me who who joined with our UNANIMOUS Board 13 in Queens to reject this ill-advised proposal, as opposed to the paid representatives of the real estate industry and their allies who will benefit from the destruction of the middle class in our city.

The fairest way to deal with the City of Yes would be to listen to the community volunteers appointed by the Boro Presidents to the Community Boards of this city. Simply target the plan to those Board areas to those communities who have approved this plan. Those Boards who have thus far voted down this plan that we see as an existential threat to the lives we pay very high taxes and mortgages for can then observe the implementation of the plan in the target areas.

If, as the paid real estate representatives claim, the plan works well then we as a Board should be trusted to do what is right for our neighbors in Eastern Queens. If it is the disaster that we foresee, then our neighborhood of Rosedale, made up primarily of hard working African-American & Afro-Caribbean homeowners, will not be harmed irreparably for no good reason except to enrich wealthy, greedy developers.

Our Councilmember divided the plan into 9 components in her recent presentation to the Rosedale Civic Association, where I have been elected to serve as Secretary. Here is my response as a 58 year resident of Rosedale, Queens to each.

1. **Accessory Dwelling Units (ADUs):** We have significant concerns about infrastructure support. Our current infrastructure, including mass transit, is wholly inadequate for the CURRENT population. The LIRR currently only runs two trains per hour to Manhattan/Brooklyn per hour through the Rosedale LIRR for most of the day. Our busses are already at standing room. There is no way the current Infrastructure can support a greatly increased population. These larger proposed structures would be endangered by our high water table and location in a flood plain.
2. **Elimination of Parking Mandates:** Residents raised concerns about potential traffic issues. Mass transit is NOT a viable option for our community on the border of Nassau County. We require private autos to shop and simply get around - it is NOT a luxury. As a 64 year old I believe it is unreasonable to expect us to bike to Costco. Parking in these proposed structures would likely cost renters funds they don't have, causing them to try to compete for the already limited space currently available. This will possibly lead to dangerous confrontations.
3. **Residential Conversions of Vacant Office Space:** Considered inapplicable to Rosedale. However, this could be a stand alone piece of legislation to help increase housing in areas like Manhattan.
4. **Town-Centered Zoning:** Proposes adding 2 to 4 floors of apartments above commercial buildings. Concerns about infrastructure support, reduced physical space for parking and traffic congestion. We already have dangerous double and triple parking that constricts our commercial strips like 243rd Street in Rosedale.
5. **Campus Residential Areas:** Adding apartment-style buildings on large sites (e.g., churches or schools with oversized parking lots) raised concerns on local parking and changes to neighborhood dynamics. Congregants would be forced to compete for already limited on-street spaces.
6. **Transit-Oriented Development:** Proposes 3 to 5 stories high apartment buildings, within half a mile of mass transit (notably LIRR Rosedale), which could affect half of Rosedale. Strong disapproval due to potential parking, traffic impacts and potential displacement of existing small businesses. Combined with the Universal Affordability component this can result in 6 story buildings within a 10 block radius of the station. A limit of a one block radius could increase housing stock and maintain neighborhoods. The pilings needed to construct large buildings like this on the former swamp land that Rosedale is built upon would be large and would likely cause significant damage to the existing century old homes, with no hope of receiving compensation from the greedy developers. In addition, the added height will cast the small back yards that our neighbors pay high taxes to enjoy after a hard day at work. These proposed six story homes would be in the path of planes landing at JFK Airport, which is less than a mile away.
7. **Small/Shared Housing:** There were mixed feelings about dormitory-style housing in current homes, but as long as the current homes are modified internally this could be another reasonable legislative fix.
8. **District Fixes:** Homeowners can alter their homes. This proposal is superfluous as this process is currently part of the Community Board ULURP process. Proposals that are deemed by the Board to be reasonable are routinely approved without objection.
9. **Universal Affordability:** Builders can add 20% more housing if affordable units (60% of AMI) are included. Concerns raised about current infrastructure support. As I previously stated, universal affordability could increase building heights from 5 stories to 6 stories. I am also concerned that there is no guarantee that these units will actually be inhabited, as owners today routinely fail to fill existing units designated for affordability. Instead they make a sham of prior agreements by warehousing existing stock. The Council should first force the existing stock to be filled with people who actually need this, and then MANDATE it in order to be permitted to build in our City.

Ultimately, the City Council will have the final say on this rushed plan from our indicted and hopelessly corrupt mayor as a gift to the real estate industry that bought him off. For many of you this will be a choice between your constituents, who previously elected you but can just as easily turn you out of your current office next year and vote against you if you seek higher office, and real estate interests from outside your district. I hope that you choose wisely.

David S Pecoraro
Member
Community Board 13Q
Secretary
Rosedale Civic Association



[EXTERNAL] Opposition to City of Yes

David Southorn <

Tue 10/22/2024 10:23 PM

To: Land Use Testimony <landusetestimony@council.nyc.gov>;

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I am writing to express my concerns regarding the "City of Yes" proposal, which, while well-intentioned, raises several issues that I believe need to be reconsidered before moving forward.

As a longtime resident of New York City and an active participant in its arts and cultural scene, I understand the importance of fostering economic development and creating more affordable housing options. However, the "City of Yes" proposal seems to prioritize rapid growth over the quality of life for many New Yorkers, especially those of us who value the distinct character and livability of our neighborhoods.

One of my main concerns is the potential for overdevelopment without sufficient attention to the infrastructure needed to support such growth. New York's public services are already stretched thin, and it is unclear how the city plans to accommodate additional residents in areas where resources like public transportation, schools, and healthcare are already under strain. The proposal seems to emphasize quantity—more housing, more businesses—without adequately addressing the quality of life for current and future residents.

As a parent of a young child, I am particularly concerned about the impact this will have on the environment in which our families live. Dense, high-rise developments might increase the number of housing units, but at what cost? Increased noise, congestion, and reduced access to green spaces are very real concerns that could negatively impact the well-being of families, particularly those with small children.

Additionally, I am deeply concerned about the proposal to remove parking minimums for new developments. While encouraging the use of public transportation is important, removing parking minimums will place unnecessary strain on residents who rely on their cars, especially families like mine. Not all areas of New York City have reliable public transit options, and removing parking will lead to overcrowded streets, increase competition for limited spaces, and create unnecessary hardships for residents who need to drive to work, drop children at school, or perform daily tasks. Parking is already at a premium, and eliminating these requirements could make life even more difficult for many of us.

While I appreciate the need for affordable housing, the "City of Yes" proposal does not adequately address how this housing will remain truly affordable for the diverse population of New Yorkers. If development is left unchecked, there is a risk that housing will continue to cater to high-income earners and investors, leaving many long-term residents, like myself, priced out of their own communities.

It is essential that any plan to reshape our city takes into account the voices of its residents. While I understand the urgency of addressing housing and economic development needs, I urge you and your colleagues to reconsider aspects of this proposal and engage with the community to create a balanced plan that promotes growth while preserving what makes New York City a unique and vibrant place to live.

Thank you for your attention to these concerns. I look forward to seeing how you will address these issues in the future planning process.

[EXTERNAL] City of Yes for Housing written testimony

David Turner <



Mon 10/21/2024 7:14 PM

To: Land Use Testimony <landusetestimony@council.nyc.gov>;

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The house that I live in used to hold, illegally, two families. But because I have money, I bought it, and now it holds one family. People with money will always have housing. But my poorer friends keep moving away, because New York is too expensive. It's too expensive because there's not enough housing. If we don't build more, the existing housing will just keep getting more expensive. The City of Yes proposal doesn't build enough housing. But it's more than we have now, so we should pass it, and then work on loosening zoning even further so that we can build even more. We shouldn't fuss about "affordable" housing. If we have enough housing, it will be affordable. That's what cities like Minneapolis have learned.

Please, pass this proposal. Help my friends afford to stay in the city.

From: [Dawn Pappas](#)
To: [Land Use Testimony](#)
Subject: [EXTERNAL] Objection - City of Yes - Throgs Neck Bronx, NY
Date: Friday, October 25, 2024 11:29:11 AM

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To whom it may concern

As a lifelong homeowner/resident of the Throgs Neck, Bronx NY community i strongly oppose the City of Yes development plan in our neighborhood. With the rezoning from several years ago already in place which has severely impacted the planning, demographic, crime, lack of parking and overall decrease in a sense of community for this area any additional influx of people would surely impact us in a negative way. The lack of appropriate transportation, shopping, medical facilities etc is not going to help any additional individuals seeking affordable housing in this neighborhood. Our streets are already overcrowded, our houses are already suffering the affects of an increase of crime...individuals trespassing on our properties, witnessing individuals smoking weed and crack outside our homes, vandalizing, breaking into our vehicles, littering to the point of homeowners being subjected to DSNY fines and us simply not feeling safe to live here any longer. I will not be pushed out of my own neighborhood simply because NYC beaurocrats decide that my community needs to do their part for housing. We have a very small local police precinct ...they simply cannot be spread any thinner to guarantee our safety if more people are here. Our infrastructure has also clearly not been studied which cannot bear additional buildings, power, sewer services etc. What do you plan to do about transporation and parking when construction occurs and causes commuters to deal with even more travel time getting to and from the city ? Clearly none of this has been considered yet we taxpayers continue to receive higher bills and receive nothing in return but forced policies, rules and fines if we don't comply. The city of yes does not belong here and Throgs Neck does not support this in any way. Thank you

--

Dawn Pappas



From: [dcm Flores](#)
To: [Land Use Testimony](#)
Subject: [EXTERNAL] Fwd: VOTE NO on the City of YES
Date: Friday, October 25, 2024 11:48:58 AM
Attachments: [Equity-Forum-ETOD Advancing-Equity-with-TOD.pdf](#)
[Belonging-roots-structural-racism-2021-06-30.pdf](#)

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I am writing to request that you VOTE NO on the City of Yes text amendment. People mistakenly believe the zoning text amendment will lead to more affordable units. Building more affordable housing is a policy NOT Zoning. If you zone for higher density housing, you will get higher density housing.

Zoning does not stipulate how much the rents are or what types of financing the developer will seek. Zoning separates a community into districts, or “zones,” that regulate land uses and the intensity of development. Please understand If the City of Yes zoning text amendment moves forward an increase in density will occur "as of right" regardless of affordability and the neighborhood impacts. The ONLY housing UNITS the city can regulate are those developers seeking funds from the City or UDP. All others that meet the minimum requirements can build to the zoning allowance regardless of affordability, thereby changing the character of my neighborhood and similar low-density growth areas. We should be looking to stabilize our homeownership to build equity and build wealth.

Transit-oriented development (TOD) can have a significant impact on Black and Brown communities, often leading to gentrification and displacement if not carefully planned and implemented with equity in mind, as these communities are frequently located near transit lines and are at risk of being priced out by rising property values brought on by new development near transit hubs; however, when done equitably, TOD can provide increased access to jobs, services, and affordable housing options for these communities.

Key points about TOD and Black and Brown communities:

- **Potential for gentrification:**

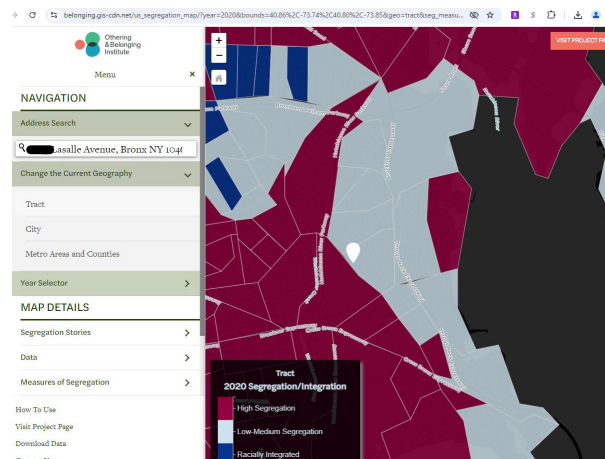
The R4A zone is not a single family zone it is a low growth area. It offers a more affordable option to mixed income and diverse populations. By eliminating the R4A zone you are limiting the opportunity for low to mid range earners and diverse ethnic populations to save and purchase a home in a nearby community. Current (R4A) homeowners (predominately black & brown) are competing with developers and investors that are buying up property to combine lots and build rental housing thereby contributing to the destabilizing of the low to middle class home ownership neighborhoods.

Without proper mitigation strategies, TOD can lead to gentrification, where existing residents, often from Black and Brown communities, are displaced due to rising housing costs as new development attracts higher-income residents.

https://belonging.gis-cdn.net/us_segregation_map/?year=2020&bounds=40.85%2C-73.81%2C40.82%2C-73.86&geo=tract&seg_measure=cat_seg_int a map that shows 2020 segregation/integration by tract. You can zoom into address level. My area is in a low-Medium segregation area but if you see the rest of NYC. Many are high segregation.

<https://belonging.berkeley.edu/roots-structural-racism>

<https://ncrc.org/gentrification/>



https://belonging.gis-cdn.net/us_segregation_map/?year=2020&bounds=40.91%2C-73.29%2C40.45%2C-74.17&geo=tract&seg_measure=cat_seg_int

- **Disproportionate impact:**

Black and Brown communities are often situated near transit lines, making them particularly vulnerable to the potential negative effects of TOD, including displacement and rising cost of living.

In the Bronx and especially Bronx Community District 10 the ½ mile Transit Developments will disproportionately impacted the predominately black and brown homeowners. Looking at data through Community Districts and Census tract is misleading. Data should be looked at through Block group data sets. Each block in this community has similarities but also have a significantly different ownership characteristics. The disparity between areas in the community is real. PLEASE look at how this plan will disproportionately impact people of color. TOD is changing the FAR for all residential districts and up to 55 feet in height. My home is located in a R4A district. I purchased my home specifically in this district because it had the protections in zoning. I wanted to live in a mixed area that is necessary to raise ethnically diverse children. I wanted to purchase a home in a (R1 & R2 10465) community but could not afford. Now my choice in wanting a low scale

mostly homeownership area is under attack. This zoning would tip the already significantly decreasing owner-occupied homes to market rate apartment dwellings. Community Boards should develop an Affordable Housing plan for their own communities with community input. It could identify sites that would be an asset to the community and meet the needs of their residents.

Need for equitable development:

To address these concerns, "Equitable Transit-Oriented Development" (ETOD) is promoted, which prioritizes community engagement, affordable housing options, and strategies to protect existing residents from displacement.

Positive impacts of TOD when done equitably and community involvement:

- **Improved access to jobs and services:**

TOD can provide better access to employment opportunities and essential services by making public transit more accessible and convenient. Many people in the Bronx **DONOT** work in Manhattan. Many households commute from East to West Bronx or vice versa or to White Plains or Yonkers for employment require a vehicle to get to work. There are no viable public transportation that supports this commute. In most areas of the Bronx we have a severe lack of parking. The decision to allow developers to skirt their responsibility to build parking is just putting the burden on the residents to pay exorbitant fees to private garages. Building parking lots does not take into consideration that residents have to pay monthly rental fees to park their car. It is another expense to an already expensive existence.

- **Economic development:**

New businesses and investment can be attracted to areas near transit stations, creating local jobs and economic growth.

- **Health benefits:**

Increased walkability and access to public transit can promote physical activity and improve overall health.

How to mitigate negative impacts of TOD on Black and Brown communities:

- **Community engagement:**

Actively involve residents in the planning process to ensure their needs and concerns are considered.

- **Inclusionary zoning:**

Implement policies requiring a certain percentage of affordable housing units within ALL new developments.

- **Rent stabilization programs:**

Must consider policies to protect existing tenants from rent increases. The Bronx now needs to focus on stabilizing our single, two, three and four family housing stock by maintaining low growth areas and developing new homeownership opportunities with a diverse income base. By reinforcing homeownership the Bronx, will provide stability to the existing community and allow for residents to see that it is possible to own and build equity not be a forever renter.

- **Targeted investments in existing infrastructure:**

Improve existing amenities and infrastructure in these neighborhoods to prevent them from being seen as less desirable.



Equity is Not an Afterthought: How to advance equity within the community

Equitable Transit-Oriented Development (ETOD) is an approach to building compact, mixed-use, pedestrian-oriented communities around new or existing public transit stations with a commitment to equity goals while ensuring low-income residents and residents of color benefit.

It includes using strategies to preserve and expand affordable housing, protect tenants and small businesses from rising costs, and expressly connect residents to jobs and economic opportunities. **Tacking equity considerations onto the process after shovels are in the ground is too late.**

What is Equity in ETOD?

Equity is the fair treatment of all individuals regardless of race, gender, sexual orientation, religion, disability, or identification with any historically underserved or marginalized group or community. Racial equity is to right historic injustices toward Black and Brown communities. Many institutions in the United States were designed with apparent racist intent. Incorporating racial equity into policies and practices can remove barriers and create opportunities for Black and Brown communities. Equitable TOD projects recognize and ensure the resources associated with TOD are allocated based on the needs of those traditionally disenfranchised, while also righting historic injustices.

[See SGA's "Equity 101: How smart growth principles increase equity in our communities" for more information](#)



"If the challenges are interrelated, so are the solutions."

– **Christian Dorsey**, Chair of the Arlington County Board

Equity Must Be Embedded in the Process

Transit-oriented development projects are invaluable assets for communities that host them—they provide an influx of jobs, housing, foot traffic, and increased accessibility to the area. If there is not a concerted effort to consider the current residents, including those historically disenfranchised by past land use decisions and developments, and the only attempt to implement equitable practices comes after the development has come online; it's too late. Equity in ETOD looks like ensuring that the process is equitable from the ideation stage to development.



"Investments are about people, not just projects."

– **Senthil Sankaran**, Principal, Amazon Housing Equity Fund

ETOD Defined

Without equitable planning and policies in place, major transit investment can generate new demand for development that further exacerbates inequities. The role of ETOD policy is to incentivize developers to construct their projects with built-in mechanisms to introduce and preserve affordability for households and businesses. Incentives can include tax credits, density bonuses, subsidies, expedited permitting, and coordination for public-private partnerships to name a few. Every TOD project will have different needs according to the local context and costs, so careful planning is necessary to fill financing gaps to produce it equitably, by protecting existing residents and limiting economic displacement around transit stations.

Ensuring the maximum utility of an ETOD project involves intense collaboration with the community—they are the ones that know the area the best, and what will be the most useful to them. That being said, ETOD leaders should also be mindful of historic and current exclusionary land use and housing policies in potential ETOD locations and apply an equity lens to all communications to prevent a continuation of the inequitable practices. When ETOD sites are located in communities that have excluded low-income residents and people of color, the broader regional communities' needs should be considered alongside the desires of residents, who may oppose new affordable housing projects in the name of preserving the status quo. Incorporating equity into TOD projects involves considering what it will take to retain current residents, enticing new residents who have been historically disadvantaged to move to the new project, and creating a community asset where everybody is welcome.

The following are examples of ETOD projects in the Washington, D.C. region:

The Lindley in Chevy Chase, MD: The Lindley (which opened in late 2018) is a 200-unit mixed-income apartment development with 20% of the units affordable to households at 50% of the Area Median Income sited next to Purple Line Transit station in Chevy Chase, MD.

New Carrollton Joint Venture: The New Carrollton project—a multi-phase joint project between WMATA, Prince George's County, Kaiser Permanente, and other developers—will create a mixed-use transit and housing development, serving as a hub and gateway to and throughout the region.

Strathmore Square at the Grosvenor-Strathmore Metro Station: A mixed-income residential community of 2,200 will be located atop the Grosvenor-Strathmore Metro Station and adjacent to the Music Center at Strathmore cultural venue.

View the recordings from the Equity Forum on our [Youtube Channel](#).



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Questions to ask



- 1 What will be the housing and economic development impact of the ETOD project on the wider community throughout all stages of the project?
- 2 Has the project considered all mobility modes? This includes but is not limited to rail, train, and streetcar, but also biking, scooting, as well as walking and accessibility needs.
- 3 How can the project support the needs and concerns of the community, considering both the needs of all residents and small businesses?
- 4 Which policy levers exist to support the identification of creative financing sources and foster authentic community involvement in ETOD projects?

What's Next?

Actions communities, planners, policymakers, and stakeholders can take to begin advocating for ETOD projects in their communities.

- ☐ Community members can learn about housing needs for your community/region by attending local meetings, and communicating with planning staff and developers for an enumeration of what's needed and how your community plans to equitably address that need.
- ☐ Advocate for ETOD policies and related practices to support this need, considering levers such as your local comprehensive plan and zoning. Be persistent, build a coalition, and don't give up.
- ☐ Policymakers can work to create incentives and requirements for developers to build or retrofit residential buildings that are integrated with units at a variety of income levels.
- ☐ Developers should scope opportunities to utilize alternative funding sources and partnership models including with local governments, non-profit organizations, and land-owning entities, such as faith-based institutions. Planners and policymakers should enable a streamlined development process utilizing tools like zoning, permitting, and other regulations to support ETOD rather than hinder it.
- ☐ Community coalitions need to be loud, and persistent. You have the lived experience and understand what it means to live, work, and play in your community, and how future projects can complement your community's character while serving current community members—instead of displacing them. Share your experiences, expertise, and knowledge with developers and policymakers. Help educate your community about what affordable housing looks like and what it means to the community and region—including those resistant to it.

Recommended reading



Greater Greater Washington: Putting the "E" in Transit Oriented Development. This collection of articles on ETOD projects in the greater Washington area shares the lessons learned and best practices. [Read more >>](#)

AARP Livable Communities Webinar: Equitable Transit Oriented Development. This webinar addresses the overall benefits of creating places that are equitable and transit-oriented; creative ways for providing and sustaining transit services in diverse communities; first- and last-mile access to public transportation; and how to build political will for equitable transit-oriented development. [Read more >>](#)

SPARCC: Equitable Transit Oriented Development. This resource page provides snapshot briefs, federal resources, and ETOD project priorities. [Read more >>](#)

Advancing Equitable Transit-Oriented Development through Community Partnerships and public sector leadership. This report spotlights four regional ETOD case studies and different approaches to support more inclusive growth. [Read more >>](#)

Equitable Transit-Oriented Development: New opportunities for people of all incomes to live near transit. This resource page from the Metropolitan Planning Council addresses ETOD issues, solutions, and case studies with best practices. [Read more >>](#)

The Role of Equitable Transit-Oriented Development in Promoting Economic Opportunity. This article provides an overview of ETOD, its effects on economic outcomes for workers, and a discussion of policy solutions for practitioners. [Read more>>](#)

The information included in the discussion guides came out of presentations at Smart Growth America's Equity Forum on Equitable Transit-Oriented Development from December 2022

View the recordings from the Equity Forum on our [Youtube Channel](#).

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The Roots of Structural Racism Project

Twenty-First Century Racial Residential Segregation in the United States

PUBLICATION | JUNE 21, 2021 |

BY **STEPHEN MENENDIAN**, **SAMIR GAMBHIR** & ARTHUR GAILES |

UPDATED JUNE 30, 2021

[DOWNLOAD PDF](#)

Project Summary¹

The Roots of Structural Racism Project was unveiled in June 2021 after several years of investigating the persistence of racial residential segregation across the United States. Among the many components included in this project are the **national segregation report** (below) which contains startling findings about the intensification of racial residential segregation in recent decades; an **interactive mapping tool** that illustrates the level of segregation in every city, region and neighborhood in the country; a **collection of tables** which list cities and metropolitan regions by various measures of segregation and political polarization; **nine city profiles** noteworthy for their levels of segregation or integration; and a **literature review featuring dozens of local city histories**. All of these components can be accessed using the **navigation menu on the right-hand side of this page**.

¹<https://belonging.berkeley.edu/>

This project spawned out of a multi-part report series on segregation **focused on the San Francisco Bay Area** we published from 2018 to 2020, and which informed efforts by the Berkeley city council in February 2021 to reconsider exclusionary zoning. We hope this new national project will be useful to housing justice advocates, researchers, lawmakers, and journalists across the country working towards integration.

Key report findings

1. Out of every metropolitan region in the United States with more than 200,000 residents, **81 percent (169 out of 209) were more segregated** as of 2019 than they were in 1990
2. **Rustbelt cities** of the industrial Midwest and mid-Atlantic **disproportionately make up the top 10 most segregated cities** list, which includes Detroit, Cleveland, Milwaukee, Philadelphia, and Trenton
3. Out of the 113 largest cities examined, **only Colorado Springs, CO and Port St. Lucie, FL qualify as "integrated"** under our rubric
4. **Neighborhood poverty rates are highest in segregated communities of color** (21 percent), which is three times higher than in segregated white neighborhoods (7 percent)
5. Black children raised in integrated neighborhoods earn nearly **\$1,000 more** as adults per year, and **\$4,000 more** when raised in white neighborhoods, than those raised in highly segregated communities of color
6. Latino children raised in integrated neighborhoods earn **\$844 more** per year as adults, and **\$5,000 more** when raised in white neighborhoods, than those raised in highly segregated communities of color
7. **Household incomes and home values in white neighborhoods are nearly twice as high** as those in segregated communities of color
8. **Homeownership is 77 percent** in highly segregated white neighborhoods, **59 percent** in well-integrated neighborhoods, but just **46 percent** in highly segregated communities of color
9. 83 percent of neighborhoods that were given poor ratings (or "redlined") in the 1930s by a federal mortgage policy were as of 2010 highly segregated

communities of color

10Regions with higher levels of racial residential segregation have higher levels of **political polarization**, an important implication in the context of **gerrymandering and voter suppression**

11The **most segregated regions are the Midwest and mid-Atlantic**, followed by the West Coast

12**Southern states have lower overall levels of segregation**, and the **Mountain West and Plains states have the least**

I. Introduction

In 2020, **disparate rates** of infection and deaths from the Covid-19 pandemic and a series of shocking police encounters captured on video, culminating in the brutal murder of George Floyd by the Minneapolis police, prompted what media organizations labeled "a **National Reckoning on race**." A greater portion of the American public awakened to the fact that too many people of color were disadvantaged in ways that seemed to shape life chances and overall well-being. **Demonstrations** supporting the Black Lives Matter movement occurred not only in large metropolitan regions, but spread to many predominantly white and rural counties across the country. Books on race and racism shot up best seller charts, **polls** indicated a groundswell of public support for race-conscious policy reforms, and the term "systemic racism" entered the mainstream lexicon.²

Racial disparities in health and well-being, policing and the criminal justice system, schools and universities, corporations and labor markets, and in neighborhoods and housing are stark and difficult to ignore. Whereas such disparities may once have been attributed to differences in intelligence, motivation or effort, the surge in anti-racism activism and reading has helped engender greater awareness of the structural inequities that underpin these outcomes. Journalists have probed these phenomena more deeply than in the past, revealing the **circumstances and conditions** that contribute to these outcomes or the **subtle differences in treatment or care** that create stunning inequities.³

Despite these efforts, however, there remains a surprising lack of appreciation for the centrality of racial residential segregation in forming and sustaining these disparities. It is residential segregation, by sorting people into particular neighborhoods or communities on the basis of race, that connects (or fails to connect) residents to good schools, nutritious foods, healthy environments, good paying jobs, and access to health care, clinics, critical amenities and services. Aggressive “**broken windows**” policing practices target racially and economically isolated Black and Brown neighborhoods, while jobs and the tax dollars flow to white communities, leaving crumbling infrastructure, poisonous water, predatory financial institutions, and food deserts behind.⁴ For these reasons, and many more, racial residential segregation remains the “**lynchpin**”—the deep root cause—that sustains systemic racial inequality.⁵



Protesters outside a real estate office demanding an end to discrimination, in Seattle, Washington in 1964. (Wikicommons)

Given the centrality of racial residential segregation to the reproduction of racial inequality—not just as a fact of history, but in contemporary terms—there is a remarkable ambivalence about this fact, and what to do about it, and not just among those who oppose racial justice advocacy or stand on the sidelines in such policy debates. For many middle-aged African Americans, the short-lived experiment in educational desegregation was a **mixed bag**—an infusion of resources and expansion of educational opportunities at the expense of community, more micro-aggressions (or worse), and fewer caring and committed teachers and administrators invested in their future.⁶ And desegregation proved fleeting. White hostility and unrelenting **opposition to integration** produced bursts of violence even in northern cities like **Chicago** and **Boston**, accelerating white flight, which further undermined the project of federally mandated desegregation, long before courts largely abandoned this effort in the early 1990s.⁷

And unlike school desegregation, the nation never embarked upon a national project to integrate neighborhoods, let alone declared an unambiguous commitment to that goal. There has never been a *Brown v. Board of Education*-like decision for housing, mandating a deliberate, proactive effort to integrate neighborhoods. Even if there had been such efforts on a wide scale, integrating neighborhoods was always going to be more difficult than integrating schools.⁸ No matter how unpopular, students could be assigned to different schools in a district or region by a central public authority under the mandate of federal courts, and bused accordingly. But there is no comparable institution or authority that has the power to compel the integration of neighborhoods and communities.

Instead, our fair housing laws are predicated on the assumption that simply prohibiting discrimination would gradually unwind decades of deliberate segregative policy and ultimately produce residential integration. This assumption proved fallacious. The Fair Housing Act of 1968, the final legislative achievement of the civil rights movement, prohibited discrimination in housing (sale, rental, lease, etc.) on the basis of race, and provided victims of discrimination with a tort remedy as well as empowered the federal government to bring suits on behalf of aggrieved parties.⁹ Indeed, the Act helped break down barriers to integration and reduce the prevalence of housing discrimination, but it was comparatively weak in terms of proactively integrating existing segregated communities.¹⁰

Nonetheless, following the passage of the federal Fair Housing Act in 1968, residential integration increased significantly between 1970 and 1980,¹¹ to such an extent that many reasonable observers felt that the residential patterns established in the early and middle decades of the twentieth century might actually fade away in time. Previously all-white neighborhoods changed complexion as non-white neighbors arrived, and vice versa.¹² Although progress incrementally slowed each subsequent decade, the in-migration of people of color into the suburbs—especially between 1990 and 2000—seemed to suggest a different and more hopeful racial trajectory, such that two economists declared the “**End of the Segregated Century**.”¹³ The downward trend of residential segregation, at least as popularly measured, seemed to portend eventual widespread residential integration. But as we'll explain later in this report, these encouraging observations turned out not to reflect the actual dynamics of what was occurring. In most regions, segregation was in fact increasing.

Aside from public health and epidemiology, one arena where policymakers, parents, and scholars speak frequently and unabashedly about the harms of segregation is in the context of education, where sharp disparities in educational outcomes and demographic profiles are stark and persistent.¹⁴ Schools have gradually re-segregated in the **65 years since** *Brown v. Board of Education* was decided.¹⁵ The problem today is that our nation's public schools **replicate the demographic profiles** of the communities and neighborhoods they serve.¹⁶

Given the failures of integration, or, more accurately, the failure to integrate (and sustain it), many anti-racism advocates evince ambivalence about integration itself, or carefully elide the issue, focusing instead on the symptoms, such as abusive policing, inadequate health care, and underperforming schools. For example, in his popular treatise *How to be an Antiracist*, Ibram X. Kendi writes, “What really made the schools unequal were the dramatically unequal resources provided to them, not the mere fact of racial separation.”¹⁷ He's right on this point, of course, but his implied solution, to simply equalize resources, is woefully insufficient as a comprehensive remedy, for reasons we will show.

It is unlikely that we can ever close out racial disparities let alone significantly improve life outcomes for racially marginalized people in a racially segregated society. ... Racial residential segregation so effectively sorts people across space and bundles vitalizing resources that no redistribution plan can ever match the swift efficacy of the underlying mechanism.

This report refocuses attention on the *roots* of structural racism: racial residential segregation. First, we explain how segregation functions not only to perpetuate and sustain racial inequality, but as a widespread and surprisingly commonplace global driver of inter-group inequality. By illustrating its near universality as an inequity-causing mechanism, we can better appreciate the continuing function of racial segregation in American society today. To that end, we briefly canvass the social scientific literature on the harms of racial residential segregation in the realms of public health, education, and economics.

Second, we will show how racial residential segregation is much more pervasive and endemic than we generally acknowledge. Not only are most of our major metropolitan regions and cities highly segregated, but we find that nearly 81 percent American cities and metropolitan regions are more segregated today than they were in 1990, after several decades of federal policy applied to this problem.

Part of the failure to recognize this is a byproduct of overreliance on inadequate measures of segregation that are no longer capable of helping us gauge the extent of segregation in an increasingly diverse and multi-racial society. Racial residential segregation has evolved during the last century, but our prevailing ways of understanding and describing it are stuck within a twentieth century paradigm.

To address these problems, we apply more recently developed measures and gauges of segregation and introduce a functionally new measure of racial residential integration. We describe regional differences in segregation and identify the most and least segregated cities in the nation, and flag places that have changed the most in recent years, either becoming less segregated or moreso.

Third, we present key findings and insights from an analysis of our observed measures of racial residential segregation. We find consistent and strong correlations between the degree of racial residential segregation and key life outcomes, such as poverty rates, home values and rents, educational achievement, life expectancy, economic mobility, and more. For example, we find that neighborhood poverty rates are highest in segregated communities of color (21 percent), which is three times higher than in segregated white neighborhoods (7 percent).

We compare highly segregated white neighborhoods to highly segregated Black and Latino neighborhoods and integrated neighborhoods, as well outcomes for different-race residents, to demonstrate the structural role of racial residential segregation in shaping access to vitalizing resources. For example, we find that Black children raised in integrated neighborhoods earn nearly \$1,000 more per year as adults than those raised in highly segregated communities of color. Latino children raised in integrated neighborhoods earn \$844 more per year as adults than Latino children raised in highly segregated communities of color.

We also describe the relationship between historical redlining and contemporary patterns of segregation, suggesting the enduring effects of government policy nearly a century ago. We also illustrate the relationship of racial residential segregation and political polarization with implications for the process of political districting.

Finally, we introduce a sophisticated and powerful new mapping tool that is capable of more vividly illustrating the extent and degree of racial residential segregation in our nation and illuminating the extent of the problem. This interactive tool can be used to observe racial residential segregation in any community at any level of geography (neighborhood, city, region), and to see changes over time.

It is our hope that this tool and the granular data made available by this project will engender not only greater awareness of the problem of segregation at the local level, but will facilitate the creation of local histories and deeper knowledge that can support local advocacy and policy change.¹⁸ For that reason, we supplement our mapping tool with a repository of city snapshots and local histories to serve as examples, educational tools and inspiration.

II. The Function and Effects of Segregation

Second only to outgroup violence, segregation is the oldest and most ubiquitous source of inter-group inequality. From the most ancient human civilizations to the present, segregation has been used to separate people on the basis of race, ethnicity, sex, class, profession, caste, and religion in public and private realms. In contemporary societies, where violence and discrimination are either outlawed or otherwise verboten, segregation is the primary mechanism for controlling access to resources, spaces and people. Segregation undergirds a vast array of resource disparities, tangible and intangible.¹⁹

It is important to emphasize at the outset, however, that racial segregation, like racial violence or discrimination, is generally not established, justified, or propounded on the basis of hatred, animus or invidiousness. Rather, it is usually advanced on the basis of peace, security, social harmony, and order, and sometimes on the basis of purity, religious or otherwise. Thus, the US War Department placed Japanese Americans into internment camps on the ground that they were a security threat to the United States during World War II;²⁰ the California Department of Corrections segregated inmates on the basis of race ostensibly to tamp down inter-group violence within prisons as recently as 2005;²¹ and, ancient European kingdoms isolated Jewish people into "ghettos" ostensibly to protect Christian religious purity.²²



Residents of Japanese ancestry pictured in front of posters with internment orders as they register for evacuation and housing, in San Francisco, in April 1942. (Library of Congress/Wikicommons)

To better appreciate the universality of segregation as a mechanism of inequality, briefly consider cases of segregation and their effects in contexts aside from race and outside of the United States: religious segregation in Northern Ireland, sex segregation in Saudi Arabia, and caste segregation in India. Through these cases, American readers will better appreciate the actual function of segregation, before we present a summary of findings on the harmful effects of American racial segregation.

India's ancient caste system deems the lowest caste, Dalits, as "untouchables."²³ This is not merely a rhetorical flourish, but a literal article of faith among many Hindus. In many villages, Dalits are forbidden to drink from upper-caste wells or to worship at their temples.²⁴ In 2020, a 17-year-old Dalit was shot and killed for entering a temple "belonging" to an upper caste.²⁵ In many ways, this kind of caste-based segregation is similar to that of Jim Crow, which restricted access to public accommodations for Black Americans.

Saudi Arabia's "Guardianship" system created an interlocking set of rules that segregates women from men.²⁶ Until very recently, these rules not only prohibited women from driving or traveling outside the country without a male family member's explicit permission,²⁷ they also restricted access to public spaces, such as movie theaters or concerts, and provided separate seating areas and entrances for men and women in restaurants and other public venues.²⁸ Again, this kind of public accommodations segregation resembles elements of Jim Crow, which provided separate seating areas in restaurants, courts and theaters, and on public transit.

For many decades in the twentieth century, Northern Ireland was a site of intense violence between Irish Catholics and "Unionist" Protestants. The conflict was dubbed "The Troubles."²⁹ In the course of this conflict, as a result of violence and enmity, neighborhoods in Northern Ireland became increasingly religiously segregated, with Catholics moving to predominantly Catholic neighborhoods and Protestants moving to more heavily Protestant neighborhoods.³⁰ These neighborhoods provided differential access to critical resources, such that today, Irish Catholic life expectancy there is 74.1 years compared to 81.7 for Protestant men.³¹ Protestant women live 4.7 years longer than Catholic women.

Racial residential segregation in the United States is associated with similar disparities in life outcomes. In the San Francisco Bay Area, for example, we found that life expectancy is more than five years greater in white neighborhoods (84 years) than in highly segregated Black/Latino neighborhoods (79 years).³² By virtually any measure of well-being, from employment, income, educational attainment, access to health care and a healthy environment, residential segregation based upon group identity is a driver of unequal outcomes.

One of the fundamental problems in our world is the divide between people who want a community built around a single, primary salient identity and those who want to live in diverse, pluralistic communities. The exclusionary enclave sentiment undergirds anti-immigrant and xenophobic sentiment worldwide, but it is also rampant within societies, including in the United States. This is the essence of segregation.

Perhaps the most extensive research on the harmful effects of racial residential segregation is in the field of public health.³³ Racial residential segregation has been linked to infant mortality,³⁴ asthma,³⁵ cardiovascular disease,³⁶ diabetes,³⁷ hypertension,³⁸ obesity,³⁹ and many other health conditions and illness,⁴⁰ including Covid-19 infections.⁴¹ Segregated communities of color often have less access to grocery stores, child care facilities, and other important neighborhood resources, and are more likely to have hazardous waste facilities in close proximity.⁴² Segregation disproportionately exposes Black communities to environmental pollutants and isolates Black populations from essential health resources such as improved recreational spaces, quality pharmacies, clinics and hospitals, and healthy food options.⁴³

The harms of segregation are well documented in the educational context as well.⁴⁴ Segregated schools are associated with teacher turnover and lower teacher quality, larger class sizes, fewer extracurricular offerings, lower test scores and graduation rates.⁴⁵ In contrast, integrated schools have more credentialed teachers, lower drop-out rates, and greater capital investments into school buildings and infrastructure.⁴⁶

A recent study of schools found that racial segregation is strongly associated with the magnitude of achievement gaps in third grade, and with the rate at which gaps grow from third to eighth grade. The study found that racial segregation appears to be harmful because it concentrates minority students in high-poverty schools, which are, on average, less effective than lower-poverty schools.⁴⁷

In a landmark longitudinal study of Black and white students in desegregated schools in the southern United States, Berkeley professor Rucker Johnson found that desegregated schools greatly improved educational outcomes for Black children with no corresponding decrease in outcomes for white children.⁴⁸ He found, for example, that at least five years spent in desegregated schools yielded an estimated 25 percent increase in annual earnings and increased annual work effort of 195 hours for Black boys. He found that each additional year of attendance in desegregated schools increased Black men's adult annual earnings by roughly 5 percent, increased their wages by 2.9 percent, and led to an annual work effort that was 39 hours higher. This reduced their chances of poverty as adults as well. Furthermore, attending a desegregated school as a child reduced by 14.7 percent the probability of spending time in jail by age 30.



Black and white school children on a school bus, riding from the suburbs to an inner city school in Charlotte, North Carolina, in February 1973. (Library of Congress)

The economics literature on racial residential segregation also firmly establishes the harmful effects on economic and social mobility and other economic outcomes. Higher levels of racial segregation are associated with lower median and per capita incomes for Black and Latino Americans.⁴⁹ It is also associated with unemployment and idleness.⁵⁰ Racial residential segregation is also strongly associated with disparities in lending practices and access to credit.⁵¹

It is an uncomfortable truth for anti-racism advocates, but one that we must confront and acknowledge: it is unlikely that we can ever close out racial disparities let alone significantly improve life outcomes for racially marginalized people in a racially segregated society. Compensatory schemes that redistribute resources can help to ameliorate these inequities, but racial residential segregation so effectively sorts people across space and bundles vitalizing resources that no redistribution plan can ever match the swift efficacy of the underlying mechanism.⁵²

Moreover, even if it could eliminate some disparities, such efforts would fail to remedy every element inside the bundle. For example, even if redistribution could match the inequity in school funding, it might fail to do so in terms of jobs. But even if it could do so in terms of jobs, it might fail to do so in terms of health care or providing a healthy environment. And even if it could do that, it might not in terms of social capital and communal fiscal stability. This is why racial residential segregation is the lynchpin of racial disparities in the United States.

III. A Fresh Look at Racial Residential Segregation

When we think of segregation, we may think of Jim Crow lunch counters or race-based pupil assignments. While the segregation of public accommodations was the primary form of segregation in the South, in the North and West, segregation was accomplished primarily through residential patterns—by law and violence that prohibited Black movers from entering any but a small number of tightly bound neighborhoods. The federal government reinforced racial residential segregation through policies such as redlining and other federal mortgage guarantees, which were promulgated locally and spread through the private market.⁵³ Although we dismantled much of Jim Crow by the late-1960s, northern-style residential segregation overtook the country, even as most neighborhoods diversified.

By prohibiting discrimination in housing on the basis of race, the 1968 Fair Housing Act began to open up previously all-white neighborhoods to people of color. Despite these prohibitions, our growing diversity and the decline in single-race communities, racial residential segregation remains a stubborn and persistent fact of life. Today, most white children live in segregated, white communities, and most Black children, similarly, live in segregated, Black neighborhoods.⁵⁴ Racially identifiable communities are everywhere, and students and families are more racially isolated than they would like to be, even controlling for income, wealth, and demographic preferences.⁵⁵

Schools have gradually re-segregated in the 65 years since *Brown v. Board of Education* was decided. The problem today is that our nation's public schools replicate the demographic profiles of the communities and neighborhoods they serve.

The prevailing narrative around gradual residential integration relies primarily on a measure of segregation that is misleading and flawed in many ways, but chiefly because it focuses on the binary of Black-white segregation. This widely used measure of Black-white segregation indicates a relatively significant decline in segregation between 1970 and 1980, with more modest declines between 1980 and 1990, 1990 and 2000, and 2000 and 2010, with the 2010 measures as either high, moderate-high, or moderate for virtually every major metropolitan area in the United States.⁵⁶ So, although this traditional measure of segregation reflects gradual declines in overall levels of segregation, for many, if not most, regions of the country, overall Black-white segregation remains high or moderately high.

One reason for the gradual decline in Black-white segregation (from extremely high to merely high or moderately-high) is the presence of anti-discrimination laws and their enforcement. As a consequence of the passage of the Fair Housing Act, there are far fewer homogeneous all-white (or all-Black) communities in the United States any more. At least some members of different races have been able to move into previously single-race communities. But a relatively small number of different-race residents should not obscure the fact that racially isolated neighborhoods are still commonplace. The fact that these neighborhoods are no longer entirely same-race does not mean that they are truly integrated, just that the ramparts of racial exclusion are no longer impermeable.

A related problem with traditional perspectives and measures of racial residential segregation is that the form that racial residential segregation takes has evolved in critical respects. Whereas racial segregation once separated people of different races into different neighborhoods in the same cities (such as different neighborhoods in Oakland, Chicago, New York, or Detroit), racial residential segregation today is more "mobile" and regional.⁵⁷ People of color have greater freedom to move to different communities than they did several generations ago, but those neighborhoods and communities are more likely to be struggling, either declining urban areas or struggling inner-ring suburbs or far-flung exurbs. In this sense, people of color are no longer locked into a small number of neighborhoods, but are channeled into certain types of often disadvantaged communities, like Ferguson, Missouri, or Vallejo, California.

As a result, racial residential segregation today occurs between cities and places as much as it does between neighborhoods within the same cities. This is what is meant by “regional” segregation: racial residential segregation is more inter-municipal than intra-municipal. Thus, the simple patterns of segregation that defined metropolitan regions in the second half of the twentieth century, such as the “Chocolate city, Vanilla suburb,” no longer hold.⁵⁸ Segregation is more prominent between different-race suburbs today than the traditional urban-suburban divide would suggest. Measures that are more sensitive to these dynamics are needed.

Contrary to prevailing impressions of the United States, the most segregated regions are the Midwest and Mid-Atlantic, followed by the West Coast. Southern states have lower overall levels of racial residential segregation, and the Mountain West and Plains states have the least.

A more serious problem with traditional binary measures of segregation is that they fail to account for America's growing diversity. A great paradox of racial segregation in America is that segregation persists despite the nation's growing diversity, and also despite the fact that there are fewer and fewer places that are racially homogenous. In other words, there are far fewer all-white or all-Black neighborhoods today than there were 50 years ago. And so many of our regions and states are more diverse than they were a generation ago.

A large and growing influx of Asian and Latino residents has dramatically shifted the complexion of our racial geography nationwide, but especially in states like California, Texas, and Washington. This diversity means that simple binary measures of racial residential segregation can no longer suffice to convey a fulsome portrait of underlying conditions or patterns. Holistic measures that can account for growing diversity are needed, and they tell a very different tale.

For that reason, we employ a relatively new measure of segregation that overcomes these problems, and better accounts for America's current diversity. This project measures segregation in a way that better accounts for Asian, Latino, and Native American populations, as described throughout. **The appendix** to this report contains a technical description of the various measures of segregation, and a more comprehensive explanation of our preferred measure over the alternatives. We find, for example, that many highly diverse regions in the United States are either as segregated or more segregated as of 2010 than they were in 1970 or even 1990. For example, Tucson, Arizona; San Jose, California; and Honolulu, Hawaii are cities that have overall much higher levels of racial residential segregation than would be suggested by Black-white segregation.⁵⁹

Overall, we found that racial residential segregation was much greater and more pervasive than is generally appreciated. We calculated the level of segregation for every city and metropolitan region in the United States. Out of every metropolitan region in the United States with more than 200,000 residents, 81 percent (169 out of 209) were more segregated as of 2019 than they were in 1990. In most cases the increase or reduction in segregation was modest, but in some cases the changes were dramatic as indicated in Tables 1 and 2 below, which provides a list of the metropolitan areas with the greatest overall increase or decrease in segregation in that time period, and indicates racial compositional changes that may have contributed to these changes in the level of segregation.

Table 1: Top 10 Metros with the Greatest Increase in Segregation (1990-2019, Minimum 200,000 people)

Rank	Metro	% Black (change)	% Latino (change)	% White (change)
1	Fayetteville-Springdale-Rogers, AR-MO	2% (+228%)	16% (+1140%)	73% (-24%)
2	Reading, PA	4% (+55%)	21% (+312%)	72% (-21%)
3	Scranton--Wilkes-Barre, PA	3% (+232%)	10% (+1626%)	84% (-15%)
4	Allentown-Bethlehem-Easton, PA-NJ	5% (+174%)	17% (+304%)	73% (-21%)
5	Providence-New Bedford-Fall	5% (+86%)	13% (+227%)	75% (-17%)

	River, RI-MA			
6	Green Bay, WI	2% (+379%)	7% (+977%)	83% (-13%)
7	Salt Lake City, UT	2% (+140%)	18% (+191%)	72% (-20%)
8	Sioux Falls, SD	4% (+786%)	4% (+838%)	85% (-12%)
9	Boston-Cambridge-Quincy, MA-NH	8% (+45%)	11% (+143%)	70% (-19%)
10	Salem, OR	1% (+26%)	24% (+219%)	68% (-23%)

Table 2: Top 10 Metros with Greatest Decrease in Segregation (1990-2019, Minimum 200,000 people)

Rank	Metro	% Black (change)	% Latino (change)	% White (change)
1	Savannah, GA	33% (-4%)	6% (+414%)	56% (-13%)
2	San Antonio-New Braunfels, TX	6% (+4%)	55% (+18%)	34% (-26%)
3	Miami-Fort Lauderdale-Pompano Beach, FL	20% (+24%)	45% (+62%)	30% (-44%)
4	Lubbock, TX	7% (-11%)	36% (+52%)	53% (-21%)
5	Mobile, AL	36% (+15%)	3% (+248%)	57% (-15%)
6	Port St. Lucie, FL	15% (+22%)	17% (+303%)	64% (-22%)
7	Flint, MI	20% (+1%)	3% (+67%)	72% (-6%)
8	Chicago-Joliet-Naperville, IL-IN-WI	16% (-13%)	22% (+102%)	53% (-21%)
9	Corpus Christi, TX	3% (-11%)	61% (+21%)	33% (-27%)
10	Jackson, MS	49% (+15%)	2% (+358%)	47% (-17%)

The complete results of this analysis, indicating the change in level of segregation and racial composition for every metropolitan area from 1990 to 2019, **are available here**.

We also calculated a complete list of the **most-to-least segregated cities** and **metropolitan areas** in the United States (again, available on the “Tables” menu on the right hand side of the project page). The top 10 most segregated metropolitan areas are presented below in Table 3, and are generally consistent with more traditional measures of segregation.⁶⁰

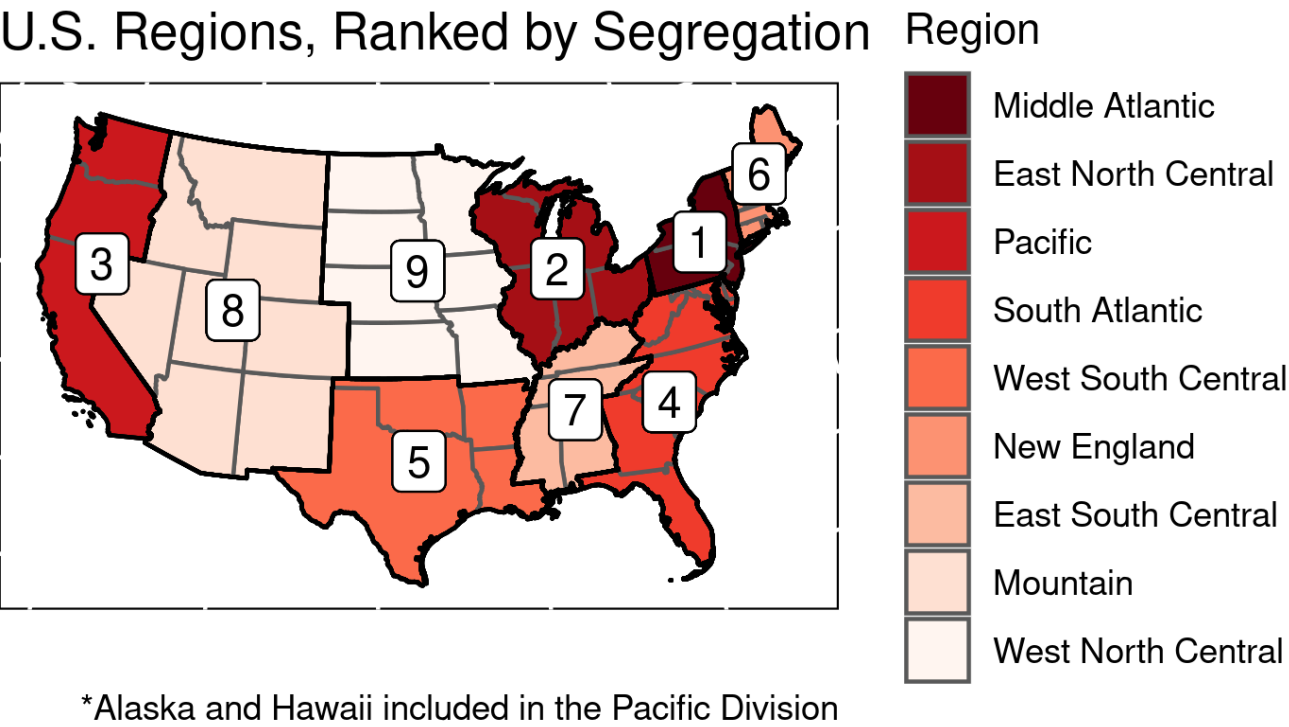
Table 3: Top 10 Most Segregated Metropolitan Statistical Areas (2019, Minimum 200,000 people)

Segregation Rank	Metro
1	New York-Northern New Jersey-Long Island, NY-NJ-PA
2	Chicago-Joliet-Naperville, IL-IN-WI
3	Milwaukee-Waukesha-West Allis, WI
4	Detroit-Warren-Livonia, MI
5	Miami-Fort Lauderdale-Pompano Beach, FL
6	Los Angeles-Long Beach-Santa Ana, CA
7	Trenton-Ewing, NJ
8	Cleveland-Elyria-Mentor, OH
9	Philadelphia-Camden-Wilmington, PA-NJ-DE-MD
10 (tied)	Beaumont-Port Arthur, TX
10 (tied)	New Orleans-Metairie-Kenner, LA

Our nation's largest cities and metropolitan areas remain highly segregated using any measure, but the rustbelt cities of the industrial Midwest and mid-Atlantic disproportionately make up the top 10 most segregated cities list, which includes places like Detroit, Cleveland, Milwaukee, Philadelphia, and Trenton. It is no coincidence that these were places where major Black Lives Matter protests occurred even before the 2020 demonstrations, and that they were also sites of major racial uprisings in the 1960s.⁶¹ These were also places where the Great Migration (1916-1970) had the strongest pull.

As these tables suggest, we find that contrary to prevailing impressions of the United States, the most segregated regions are the Midwest and Mid-Atlantic, followed by the West Coast (See Figure 1). Southern states have lower overall levels of racial residential segregation, and the Mountain West and Plains states have the least.⁶²

Figure 1



Consistent with the regional pattern, many mid-Atlantic and Midwestern cities like Scranton and Green Bay have had large increases in segregation in the last 30 years (see Table 1, above). Conversely, southern cities in states like Florida and Texas have had equally significant demographic change, but managed to reduce racial residential segregation (see Table 2, above).

In addition to using a relatively new measure of segregation, we created a functionally new measure of integration for this project that identifies places that are both diverse and have lower levels of residential racial isolation (this is also described in the Technical Appendix). Some communities and regions may appear to have relatively little racial residential segregation, but that could be because they are not very diverse. Thus, we combine diversity thresholds with our preferred measure of segregation to find places that can be truly characterized as integrated.

Although there are many integrated neighborhoods around the country, very few cities and metropolitan areas meet our definition. Out of the 113 largest cities examined, only Colorado Springs, CO and Port St. Lucie, FL qualify as “integrated” under our rubric. Similarly, out of the 221 largest metropolitan regions, only San Luis Obispo-Paso Robles, CA and Colorado Springs, CO qualify as “integrated.” Overall, the United States remains very racially segregated.

Using our preferred measures of segregation and integration, we have a clearer and more accurate view of the extent racial residential segregation around the country. Moreover, using these measures we can better understand the relationship between segregation and key life outcomes.

IV. Key Findings

Examining demographic data (income, race, etc.) and our preferred measures of segregation and integration, we find a number of apparent and sometimes startling relationships. Most prominently, we find a striking relationship between income by race and racial residential segregation. Specifically, we find that Black and Latino income is higher in more integrated neighborhoods. Poverty rates are significantly lower (14 percent compared to 21 percent) in integrated neighborhoods compared to segregated communities of color.⁶³

Table 4 below includes a summary of our main findings, which compares conditions and outcomes in integrated neighborhoods with outcomes in highly segregated white neighborhoods and highly segregated communities of color (“POC Segregation”). Despite the strong correlations, we caution that this analysis cannot prove that racial segregation is the cause of these neighborhood outcomes, but the consistent direction of outcomes across a large set of variables along these types of neighborhoods is highly suggestive and consistent with the “neighborhood effects” literature, which attributes life outcomes to community conditions.⁶⁴

Table 4: 2019 Segregation and Select Neighborhood Outcomes^{65 66}

Indicator	Integrated Neighborhoods	Highly Segregated Communities of Color	Highly Segregated White Neighborhoods
Median Household Income	\$63,830	\$54,278	\$100,956
Median Home Values	\$244,162	\$266,927	\$474,798
% Below Poverty	14%	21%	7%
% Owner-Occupied Homes	59%	46%	77%
% With Bachelor’s Degree	30%	23%	46%
Life Expectancy	78	77	81
Median Rent	\$1,177	\$1,174	\$1,545
% Unemployed	6%	8%	4%
% of US Land Area	7%	9%	7%
% of US Population	12%	20%	11%

The best life outcomes are found, however, in highly segregated white neighborhoods, which is consistent with a theory of “opportunity hoarding” that predominantly white cities and communities have greater resources and often have the fewest people of color living in them.⁶⁷ Household incomes in these neighborhoods are nearly twice those in segregated communities of color. That income differential contributes to wealth disparities, as home values are also nearly twice as high. Even life expectancy is four years longer in these neighborhoods than in segregated communities of color.⁶⁸ But critically, these neighborhoods are difficult to access: monthly rents are more than \$300 and \$400 per unit higher than in either integrated or highly segregated POC neighborhoods, respectively.

It is also notable that home ownership is much higher in both white segregated neighborhoods and integrated neighborhoods than in segregated communities of color. Homeowner occupancy is 77 percent in highly segregated white neighborhoods, 59 percent in well-integrated neighborhoods, but just 46 percent in highly segregated communities of color. Homeownership is a critical pathway to wealth accumulation.

We also examined economic outcomes (and rates of incarceration) for children of different races born between 1978 and 1984 across these neighborhood types (as measured in 1990).⁶⁹ We found clear and consistent evidence that children raised in integrated neighborhoods had better outcomes than children raised in segregated communities of color (see Table 5).⁷⁰ Black children raised in integrated neighborhoods earn nearly \$1,000 more per year as adults than those raised in highly segregated communities of color. Latino children raised in integrated neighborhoods earn \$844 more per year as adults than Latino children raised in highly segregated communities of color.

The best economic outcomes, however, again occurred in highly segregated white neighborhoods. Average income is substantially higher in those neighborhoods, not just for white children, but for Black and Latino children as well. Black children raised in highly segregated white neighborhoods earned nearly \$4,000 more as adults than Black children raised in highly segregated communities of color. Similarly, Latino children raised in highly segregated white neighborhoods earned about \$5,000 more per year as adults than Latino children raised in segregated communities of color.

Neighborhood segregation appears to affect outcomes for people of all races residing in them, not just members of certain racial groups. By shaping outcomes for all residents irrespective of race, these results reinforce our view that racial residential segregation is a structural force that allocates and distributes vitalizing resources.

Table 5: 1990 Neighborhood Segregation and Select Outcomes for Racial Groups

Indicator	Integrated Neighborhoods	Highly Segregated Communities of Color	Highly Segregated White Neighborhoods
Future Average Income	\$29,593	\$27,685	\$38,035
Future Black Income	\$22,996	\$22,061	\$25,867
Future Latino Income	\$34,354	\$33,510	\$38,122
Future White Income	\$34,968	\$34,940	\$41,066
% of Children Imprisoned as Adults	3%	3%	2%
% of Black Children Imprisoned as Adults	5%	6%	5%
% of Latino Children Imprisoned as Adults	2%	2%	2%
% of White Children Imprisoned as Adults	2%	3%	2%

Although the form that racial residential segregation takes in the United States has evolved in ways described in the previous section, we nonetheless find that federal policy in the New Deal and post-war period may continue to shape those patterns. Using digitized Home Owners Loan Corporation (HOLC) city survey security maps, we analyzed the relationship between levels of segregation in our map and the designation of neighborhoods by the HOLC, an agency created during the 1930s to slow the tide of foreclosures and extend credit for home loans.⁷¹

The HOLC ranked neighborhoods as part of its survey program. Neighborhoods marked in Green (grade A) were considered “Best,” blue (grade B) were considered “Still Desirable,” yellow (grade C) were “Definitely Declining,” and red (grade D, hence the term “redlining”) were deemed “Hazardous.”⁷² Using the digitized HOLC security maps from the 1930s and our preferred measure of segregation, we can infer the extent to which federal policy nearly a century ago may be shaping racial residential segregation today.⁷³

Table 6 indicates the percentage of HOLC graded neighborhoods within each level and type of racial residential segregation.⁷⁴ For example, of well-integrated neighborhoods as of 2010 that were given a HOLC grade in the 1930s, 5.8 percent were graded A, 25 percent were graded B, 46.5 percent were graded C, and 22.6 percent were graded D. This shows that very few integrated neighborhoods today were given high HOLC grades.

The most important finding from the table is the evidence of the lingering effects of past governmental policy. Of the highly segregated communities of color as of 2010, only 2 percent were graded “A” in the 1930s, while 83 percent were graded either “C” or “D.” This suggests that lower HOLC grades (and by extension federal mortgage insurance policy) may have contributed to the perpetuation of racial residential segregation. The unsurprising corollary to this finding is that highly segregated white neighborhoods as of 2010 had the fewest percentage of “C” and “D” HOLC rankings and the highest percentage of “A” rankings among the neighborhood types presented. Nearly a century later, federal policy has a long tail.

Table 6: HOLC Grades by 2010 Neighborhood Segregation Type

Segregation Category	HOLC Grade A	HOLC Grade B	HOLC Grade C	HOLC Grade D
Well Integrated	5.8%	25.1%	46.5%	22.6%
Medium Segregation	9.8%	26.4%	44.5%	19.3%
Highly Segregated Communities of Color	1.9%	15.0%	47.3%	35.7%
Highly Segregated White Neighborhoods	15.8%	31.4%	37.0%	15.8%

Another issue we examined was the relationship between segregation and political polarization. Some scholars have argued that racial residential segregation may be a driver of political racial polarization, and have found evidence supporting this claim.⁷⁵ For example, a recent study found that “cross-ethnic” exposure in childhood predicted political preferences decades later.⁷⁶ We apply our preferred measure of segregation to investigate this issue.

Political polarization is a nuanced concept that refers not simply to partisanship or the intensity of partisan feelings, but the degree to which people gravitate to the ends of the political spectrum rather than cluster in the middle.⁷⁷ Aggregate election results by themselves do not necessarily tell us the degree of political polarization that may exist (since options in general elections are essentially binary, i.e. Republican vs. Democrat), but measures of political segregation can indicate regional political polarization.

We analyzed the relationship between racial residential segregation and regional political segregation for 314 metropolitan areas, and the results are illustrated in Figure 2 below.

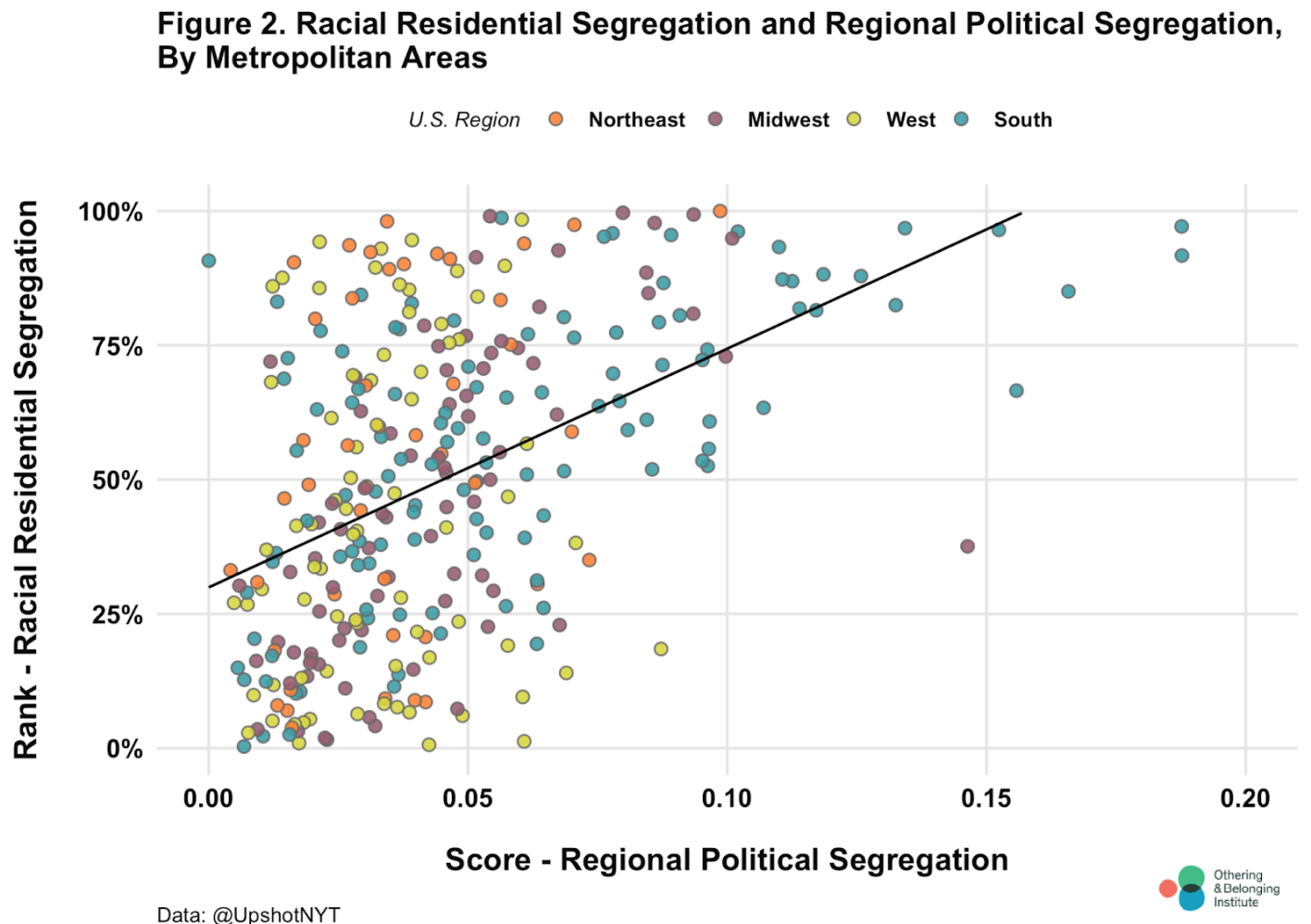


Figure 2 presents our percentile rank of racial residential segregation on the vertical axis and metropolitan political polarization on the horizontal axis (see endnote for a description of our measure).⁷⁸ The graph shows a strong correlation (.54). In simple terms, the greater the level of racial residential segregation, the greater the level of political polarization. Whether there is a causal relationship between the two or some deeper force explaining both is a matter of some academic interest, but one we need not resolve here.

In any case, the finding presents a very important policy implication. When racial segregation is greater, political gerrymandering—the process of drawing political districts for political advantage—may be easier. By sorting people across space within a region, racial residential segregation makes gerrymandering techniques like “packing” and “cracking” easier at the same time that racial political polarization makes race a stronger predictor of political voting patterns.⁷⁹ This is yet another reason to be concerned about racial residential segregation.

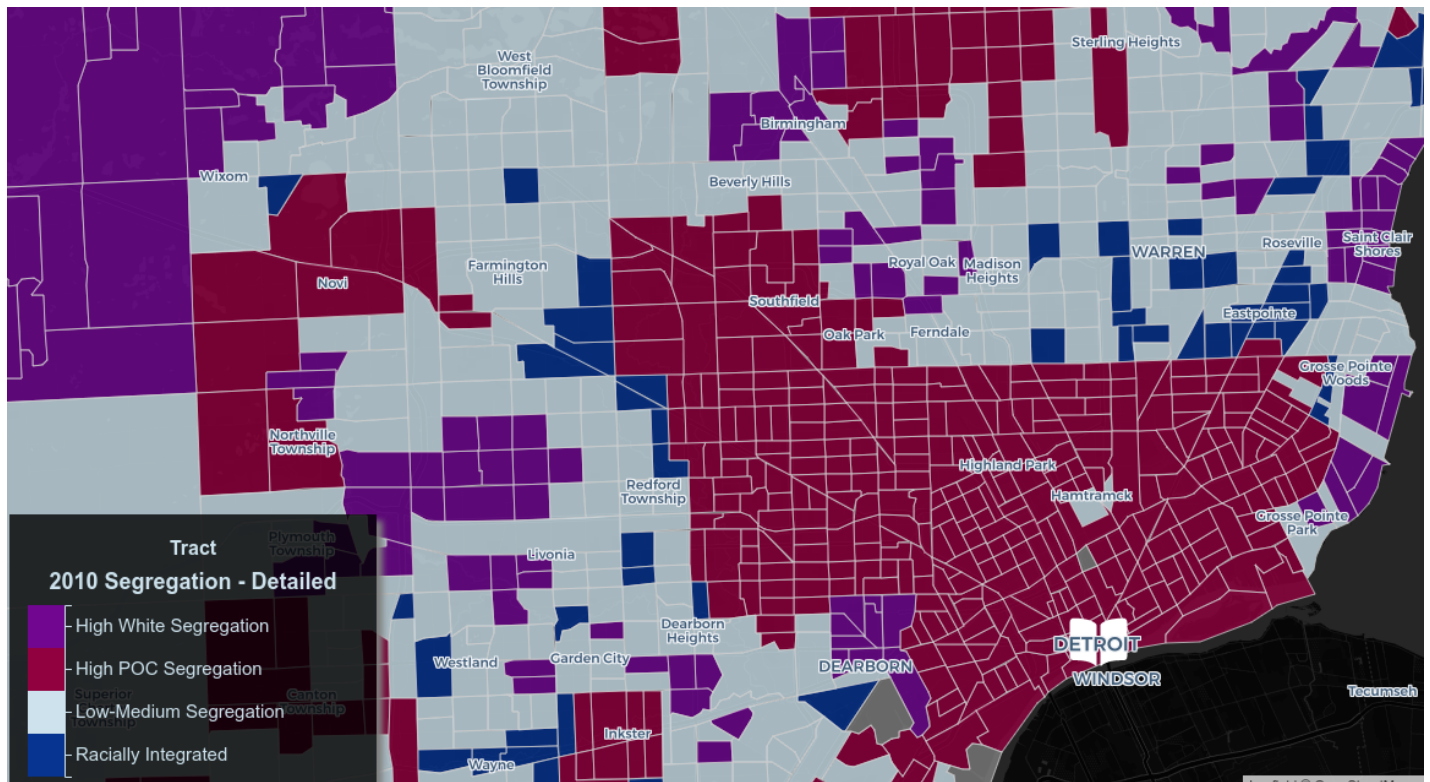
V. Using our Interactive Mapping Tool

Our preferred measure of segregation and novel measure of integration is not just more revealing, it helps us present more intuitive visualizations of the reality and extent of racial residential segregation in the United States. To accompany this report, we created a **new interactive mapping tool** to illustrate the level of segregation for every city, region and neighborhood in the United States while also indicating the racial composition of any neighborhood selected. (There are several other, excellent mapping tools that represent educational segregation, which our map does not do).⁸⁰

After clicking “begin,” the map’s default layer displays the holistic level of segregation for every city and metro area in the country using our preferred measure. Users can then either enter an address or city into the search bar or use the zoom function to locate any specific area of the country and directly observe the level of segregation that exists there, at the level of census tract, or neighborhood.⁸¹ The color scheme and legend indicate the level of segregation (or integration). When selecting a census tract on the map, the chart on the left-hand side of the map provides the racial composition of the tract, the tract number, and the specific segregation value and percentile.

For example, take a look at the Detroit metropolitan region, one of the most segregated regions in the country (99th percentile of segregation). Blacks and Latinos are heavily over-represented (89 percent of the city compared to 27 percent of the metro in 2010), and highly isolated within the city (see Figure 3 below). The surrounding cities within the region are often either more integrated and representative areas like Eastpointe City (48th percentile), or highly white segregated areas like Livonia City (90 percent white, 77th percentile).⁸²

Figure 3: Detroit



Not only does the interactive map indicate the level of racial residential segregation for every neighborhood in the United States, but also for different census years (as well as for different measures of segregation, which we describe in the Technical Appendix to this report). The default left-hand menu allows you to view the level of segregation for any place in 1980, 1990, 2000, 2010, or 2019 (2020 census data has not yet been released at the time of this publication).⁸³ Using the slider, you can compare how segregation has changed in your own community or any other community of interest.

For example, if we look at a neighborhood in the French Quarter of New Orleans, we find that the level of segregation is “moderate” as of 2010, our default year. But if we use the slider, we find that the level of segregation for that neighborhood was “low” in 1980 and became more segregated in the intervening years (peaking in 2000).

Users may also switch between different measures of segregation and select any corresponding geography they would like to retrieve scores or values for those measures (see the Technical Appendix for a description of measures). Users may also use the slider to move forward to backward in time for their preferred measure.

In addition to allowing users to directly observe the level of racial residential segregation for any place in the United States since 1980, we have developed nine city snapshots that briefly highlight cities in the country that have 1) most rapidly integrated over this time period or 2) remain the most stubbornly segregated places in the country. Simply click the "storybook" icon to read the city snapshot. We have provided snapshots of Chicago, New Orleans, Detroit, Boston, Aurora (CO), Colorado Spring (CO), Inglewood (CA), Killeen (TX), and New York City.

A great paradox of racial segregation in America is that segregation persists despite the nation's growing diversity, and also despite the fact that there are fewer and fewer places that are racially homogenous.

It is our hope that this tool can be used by local grassroots organizations and fair housing advocates to support fair housing litigation and policy reforms, as well as the development of local histories. With the underlying data (both segregation and racial composition) made readily available to any user for free, it should be relatively simple for fair housing advocates to input key data points to support arguments on behalf of integration.

To aid in the development of local histories, we have created a backend database of reports, articles, essays, chapters, and books pertaining to specific localities that provide accounts of how segregation occurred in those places. An **annotated bibliography** of these resources is viewable on the right-hand menu to this web report or as a layer in the map. We provide those narratives not only to contextualize the data in our map, but also as models for other groups to emulate.

VI. Conclusion

One of the fundamental problems in our world is the divide between people who want a community built around a single, primary salient identity and those who want to live in diverse, pluralistic communities. The exclusionary enclave sentiment undergirds anti-immigrant and xenophobic sentiment worldwide, but it is also rampant within societies, including in the United States. This is the essence of segregation.

As the “root” metaphor suggests, reducing racial disparities in health care, criminal justice enforcement or education without addressing racial residential segregation is treating symptoms and not causes. Segregation remains one of the principal causes of group-based inequality, by separating people from life-enhancing resources, such as good schools, healthy environments, and access to jobs. This was the *raison d'être* for public accommodations segregation in the Jim Crow South: to maintain a racial caste system. But residential segregation does this with nearly the same wicked efficiency today. We must act if we are serious about remedying systemic and structural racism. But before we can act, we first need to recognize the problem. Our primary goal with this report is to better help us do just that.

We have made progress toward integration in the past (and, in fact, most American cities were more racially residentially integrated in the nineteenth century than they were in the twentieth), and can do so again in the future.⁸⁴ But it takes focused attention and deliberate effort. In the educational context, between 1968 and the early 1990s, we made enormous strides in creating more integrated school systems.⁸⁵ Although many schools have gradually re-segregated since, these efforts prove it was possible.

Our concerns with persistent racial residential segregation in the United States are primarily empirical, not philosophical. They are based upon a careful review of the ever-accumulating and already voluminous social science evidence that racial residential segregation is associated with harmful impacts in terms of health, educational attainment, employment, income and wealth. This evidence supports our view that racial residential segregation is the mechanism that sorts people into advantaged or disadvantaged environments based upon race, and therefore is the taproot of systemic racial inequality.

Although this project is based upon a careful review of the evidence of the harms caused by racial residential segregation, there are other grounds to be concerned about the persistence of racial residential segregation. As we said in another **recent publication**, "racial residential segregation undermines the possibility of a national community with a sense of shared purpose and common destiny; this is a less immediate danger and more difficult to perceive and fully appreciate."⁸⁶

Indeed, this was one of the principal insights of the prophetic **Kerner Commission report** of 1968. As it stated in its chapter on "The Future of the Cities," integration is "the only course which explicitly seeks to achieve a single nation" rather than a dual or permanently divided society.⁸⁷ Even if it were possible, however unlikely, to ameliorate extreme inequalities between segregated communities and achieve the "separate, but equal" status which was a transparent fiction in *Plessy v. Ferguson*, that would merely reinforce societal balkanization, not help engender a cohesive yet diverse nation where everyone belongs.

Click for the Technical Appendix.



A half-abandoned short block of buildings in downtown Chester, Pennsylvania pictured in May 2019. The city experienced a massive "white flight" after the Great Migration in the mid-twentieth century. (Library of Congress)

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- 1 This project has been in development for many years, and the authors would like to thank Lindsey Burnside, Peter Mattingly, Karina French, and Ruqayah Ghaus for their research support and contributions to this project. The authors would also like to thank external reviewers Richard Rothstein, George Galster, Sheryll Cashin, Alex Schafran, and Nancy McCardle for their expert feedback on this project.
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- 11** Richard H. Sander, Yana A. Kucheva and Jonathan M. Zasloff, *Moving Toward Integration: The Past and Future of Fair Housing* (Cambridge, MA: Harvard University Press, 2018), 166-198 (investigating the "puzzle" of why some cities integrated more than others between 1970 and 1980). See our technical appendix for a different and more nuanced definition of what we mean by "integration."
- 12** By "White," we deviate from contemporary census conventions, and mean the term to refer to non-Hispanic white people. Further, although the US Census classifies Asian, African-American/Black, and white/Caucasian as racial

categories and Hispanic as an ethnic category, we refer to Latino/a as a racial category that generally encompasses groups that the census counts as "Hispanic, non-white," and classify "non-Hispanic whites" as simply white, and so on. We recognize that racial and ethnic categories are contested and politically fraught, but adopt this taxonomy for ease of analysis and simplicity in discussion. We further recognize the gendered nature of Latino, but, we use "Latino" in a gender neutral manner, or alternatively Latinx. Relatedly, we classify Native American peoples as a racial category, although tribal membership is not necessarily an indicator of racial identity.

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- 14** See e.g. Allison Roda and Amy Stuart Wells, "School Choice Policies and Racial Segregation: Where White Parents' Good Intentions, Anxiety, and Privilege Collide," *American Journal of Education* 119, no. 2 (2013): 261-293, <https://www.journals.uchicago.edu/doi/abs/10.1086/668753?mobileUi=0&journalCode=aje&>. (for a scholarly example) and the New York Times podcast *Nice White Parents* (for a more popular example) Chana Joffe-Walt, "1: The Book of Statuses," July 30, 2020, in *Nice White Parents*, produced by Simplecast, MP3 Audio, 1:00:45, <https://www.nytimes.com/2020/07/23/podcasts/nice-white-parents-serial.html>.
- 15** "Brown at 65 -- No Cause for Celebration," UCLA Civil Rights Project, May 10, 2019, <https://www.civilrightsproject.ucla.edu/news/press-releases/press-releases-2019/brown-at-65-no-cause-for-celebration>.
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- 17** Ibram X. Kendi, *How to be an Antiracist* (New York, NY: One World, 2019), 176.
- 18** This report and project is focused on illuminating the extent of racial residential segregation in the United States and its harmful consequences. We do not attempt to explain how racial residential segregation was created and perpetuated (although we may allude to some contributing factors), nor do we offer a set of solutions to this problem. Such an effort would be beyond the scope of our narrow purpose: to raise awareness of the extent and nature of the problem. There are many different theories on what causes or sustains racial residential segregation. For a sense of the (unresolved) scholarly debate on the causes of racial residential segregation, see Stephen Menendian, "Recent Writing on the Causes, Consequences, and Politics of Racial Segregation," Othering & Belonging Institute, October 31, 2019, <https://belonging.berkeley.edu/recent-writing-causes-consequences-and-politics-racial-segregation>. For sources on solutions to the problem, see e.g. Stephen Menendian, Samir Gambhir, and Arthur Gailles, *Racial Segregation in the San Francisco Bay Area, Part 5: Remedies, Solutions, and Targets* (Berkeley, CA: Othering & Belonging Institute, 2020); Richard Rothstein, "Considering Fixes," in *The Color of Law: A Forgotten History of How Our Government Segregated America* (New York, NY: Liveright Publishing Corporation, 2017); Richard Sander, Yana A. Kucheva and Jonathan M. Zasloff, *Moving Toward Integration: The Past and Future of Fair Housing* (Cambridge, MA: Harvard University Press, 2018), 409-444.
- 19** It is worth emphasizing this nuanced distinction. While equity advocates accurately appreciate the harms of segregation in terms of the distribution of tangible resources, the courts and many social scientists have also regularly understood the harms of segregation in intangible terms as well. In *Brown v. Board of Education* (1954), most notably, the US Supreme Court stipulated that "the Negro and white schools involved have been equalized, or are being equalized, with respect to buildings, curricula, qualifications and salaries of teachers, and other 'tangible' factors." *Brown*, 347 U.S. at 492. It did so, based upon an agreement of the parties, so that the Court might rule against the doctrine of 'separate, but equal' on broader grounds, not as a legal fiction to be made honest. See John A. Powell, RSF: *The Russell Sage Foundation Journal of the Social Sciences* 7, no. 1 (2021): 20-31, <https://www.rsjournal.org/content/7/1/20>. Similarly, in *United States v. Virginia*, 518 U.S. 515 (1996), the Supreme Court struck down the state of

Virginia's female-only alternative to its prestigious military institute, VMI. As the Court observed in a landmark opinion delivered by Justice Ruth Bader Ginsburg, VMI's reputation, unique history, unique training, and alumni network could not be duplicated at a sister institution, no matter how well resourced. In any assessment of the harms of segregation, we must try to look beyond tangible resources and simple disparities.

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Index in the top third nationally, but not in the above category. Well Integrated: Divergence Index in the bottom third nationally, an Entropy score in the top 50% nationally, and at least 20% Black and Latino. Low-Medium Segregation: All other census tracts not covered by the other three categories. In practice, this means they are neither highly segregated nor integrated by our definition.

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Loans to African Americans," *Journal of Urban History* 46, no. 1 (2020): 150-180, quoted in Jason Richardson et al., *The Lasting Impact of Historic "Redlining" on Neighborhood Health: Higher Prevalence of Covid-19 Risk Factors* (Washington, D.C.: National Community Reinvestment Coalition, 2020), 9, <https://ncrc.org/holc-health/>.

72 See e.g. Anthony L. Nardone et al., "Associations Between Historical Redlining and Birth Outcomes from 2006 through 2015 in California," *PLoS ONE* 15, no. 8 (2020), <https://journals.plos.org/plosone/article?id=10.1371/journal.pone.0237241>.

73 There is more nuance to this story than we can present here. In brief, HOLC lending mostly wound down by 1936, but the appraisal system it created would live on for decades longer. In particular, this system spread throughout the private market, even where it had not already been implicitly present, and to the FHA redlining maps. See Price V. Fishback et al., "Race, Risk, and the Emergence of Federal Redlining," NBER Working Paper, no. 28146 (2020), <https://www.nber.org/papers/w28146>. There are also many other researchers using the digitized HOLC maps to assess their possible impact over time. See e.g. Daniel Aaronson, Daniel Hartley, and Bhash Mazumder, "The Effects of the 1930s Holc 'Redlining' Maps," FRB of Chicago Working Paper, no. 2017-12 (2017): 1-81, <https://www.chicagofed.org/publications/working-papers/2017/wp2017-12> and Jacob W. Faber, "We Built This: Consequences of New Deal Era Intervention in America's Racial Geography," *American Sociological Review* 85, no. 5 (2020): 739-775, <https://journals.sagepub.com/doi/full/10.1177/0003122420948464>.

74 This is a very complicated table to render for a number of methodological reasons. But not every city was given a HOLC grade, and not every neighborhood within graded cities was graded at the time (because it may not have existed). Also, HOLC grades were not uniformly distributed. Overall, 6 percent of areas were grade A, vs 45 percent being grade C, which helps explain why such a large percentage of neighborhood types are "C" grades today.

75 See Jessica Trounstein, *Segregation by Design: Local Politics and Inequality in American Cities* (Cambridge, United Kingdom: Cambridge University Press, 2018). (Arguing that racial segregation could be both a cause and effect of political polarization). It could be a cause, as Trounstein argues, because racial

residential segregation undermines broad support for investments in public goods. But it could also be an effect because racial residential segregation facilitates political gerrymandering. Indeed, the Supreme Court has suggested that racial gerrymandering is in effect state-based racial segregation. *Shaw v. Reno*, 509 U.S. 630, 1993 (Justice O'Connor characterized racial redistricting as "an effort to segregate voters into separate voting districts because of their race.") See also *Miller v. Johnson*, 515 U.S. 900 (1995) (Justice Kennedy wrote that "the essence of the equal protection claim recognized in *Shaw* is that the state has used race as a basis for separating voters into districts"). The problem is that the Court has essentially refused to regulate political gerrymandering not based explicitly or obviously on race. *Gill v. Whitford*, 585 U.S. ___ (2018)

- 76** Jacob R. Brown et al., "Childhood Cross-Ethnic Exposure Predicts Political Behavior Seven Decades Later: Evidence From Linked Administrative Data," *Science Advances* 7, no. 24 (2021): 1-14, <https://advances.sciencemag.org/content/7/24/eabe8432>.
- 77** Polarization is an elusive concept. As a helpful analog, economic polarization is when a larger part of the income distribution exists at the tails rather than in the middle.
- 78** To operationalize a measure of political polarization, we use the Divergence Index formula: Broadly speaking, we define political polarization as the degree of "divergence" in political attitudes to ideological extremes. For this analysis, we calculate the share of Democratic and Republican votes from the 2020 US Presidential Election for individual voting precincts and compare that share with the greater metropolitan area. Using the Divergence Index, we configure how extreme ideologies are in a precinct based on how over- or underrepresented that ideology is relative to the surrounding precincts within that area. For example, the metropolitan area of Jackson, Mississippi ranks first in political divergence, indicating the presence of ideological extremes where precincts overwhelmingly voted in favor of one party while neighboring precincts voted in favor of the other party. Comparatively, the metropolitan area of Carson City, Nevada has one of the lowest political divergence scores, suggesting that neighboring precincts tended to vote less in favor of one candidate and that the share of votes between parties was relatively consistent across all precincts within that area.

- 79** Nicholas Stephanopoulos and Eric McGhee, "Partisan Gerrymandering and the Efficiency Gap," *University of Chicago Law Review* 82 (2015): 831-900, https://chicagounbound.uchicago.edu/cgi/viewcontent.cgi?article=12542&context=journal_articles.
- 80** See e.g. "Educational Opportunity in the U.S.," The Educational Opportunity Project at Stanford University, <https://edopportunity.org/explorer/#/split/none/districts/avg/ses/all/3.15/37.39/-96.78/>; Kate Rabinowitz, Armand Emamdjomeh and Laura Meckler, "How The Nation's Growing Racial Diversity is Changing Our Schools," *The Washington Post*, September 12, 2019, <https://www.washingtonpost.com/graphics/2019/local/school-diversity-data/>; Alvin Chang, "We Can Draw School Zones to Make Classrooms Less Segregated. This is How Well Your District Does," *Vox*, last modified August 27, 2018, <https://www.vox.com/2018/1/8/16822374/school-segregation-gerrymander-map>. These mapping tools allow users to look up schools and school districts to assess the level of segregation among other uses.
- 81** We anchor these findings with the Metropolitan/Micropolitan (Core-Based) Statistical Area or county, as available. "Core-Based Statistical Areas," United States Census Bureau, last modified December 7, 2016, <https://www.census.gov/topics/housing/housing-patterns/about/core-based-statistical-areas.html>.
- 82** We aggregate place population from the census tract, so our reported percentages differ slightly from official Census counts. See the Technical Appendix for more details <https://belonging.berkeley.edu/technical-appendix>.
- 83** As soon as the tract-level 2020 census results are out, we will update our map and key findings in this report.
- 84** See e.g. James H. Carr and Nandinee K. Kutty, "The New Imperative for Equality," in *Segregation: The Rising Costs for America*, eds. James H. Carr and Nandinee K. Kutty (New York, NY: Routledge, 2008), 3-4.
- 85** See Carl Kaestle, "Federalism and Inequality in Education: What Can History Tell Us?," in *The Dynamics of Opportunity in America: Evidence and Perspectives*, eds. Henry Braun and Irwin Kirsch (Switzerland: Springer International Publishing AG, 2016), 48, table 3.1.

- 86** Nirali Beri, Richard Rothstein, and Stephen Menendian. The Road Not Taken: Housing and Criminal Justice 50 Years after the Kerner Commission Report. (Berkeley, CA: Othering & Belonging Institute, 2019).
<https://belonging.berkeley.edu/road-not-taken>.
- 87** Otto Kerner et al., Report of The National Advisory Commission on Civil Disorders (Washington, D.C.: United States Government Publishing Office, 1968), 406.
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University of California, Berkeley

460 Stephens Hall

Berkeley, CA 94720 MC 2330

510-642-3326 • belonging@berkeley.edu

Berkeley

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[Accessibility](#) | [Nondiscrimination](#)

[EXTERNAL] Vote No on the City of Yes

Dcskynic <

Wed 10/23/2024 2:17 PM

Inbox

To:Land Use Testimony <landusetestimony@council.nyc.gov>;

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I am a homeowner that lives in the westchester square - schuylerville section of the bronx. I thought this article was extremely relevant to how my neighborhood is perceived and how homeowners and local residents are competing with the lobbyist, developers and investment companies to maintain our housing stock (homeownership and rental housing) affordable.

In the fall of 2020, two large and very illegal Halloween parties were busted in New York City as the Covid-19 pandemic raged on. One was in eastern Williamsburg, the other in the Westchester Square neighborhood of the Bronx, both drawing people from well beyond those neighborhoods.

The sheriff who helped break up the Bronx party said that he realized something was amiss when he noticed people wearing costumes “in the middle of nowhere.” Reporting on it the next day, a local newscaster said, “The party planners picked neighborhoods like this one, industrial, empty so their parties could go largely unseen and unheard.”

This logic of finding a desolate area would make sense when planning a party for over 550 people during a pandemic, except that [the Bronx] party was not in an “empty” area. (As my book shows, Williamsburg isn't an "empty" area either). The census tract down the street from the venue has a population density of 195,863, higher than many tracts in Manhattan. I taught in the area

from 2018 to 2022 and exited the subway at the same stop where the partygoers would have disembarked. The neighborhood was always bustling with food vendors, children running back and forth in the playground, teenagers celebrating their freedom from the school day, families and older folks waiting in line for a shuttle to the nearby hospital complex, and dozens of businesses of necessity as well as fast-food and sit-down restaurants.

The party was not “in the middle of nowhere” but rather in a highly populated, lower-income, and predominantly Latinx, Asian, and Black neighborhood.

The comments from the sheriff and the news reporter are reminiscent of the descriptions of pre-gentrified Williamsburg(s). When existing populations and businesses are labeled in this way, we can imagine that gentrification is not far off. Parts of the Bronx have already been reshaped by state-led “condo-fication” efforts. The narratives of the Westchester Square neighborhood being empty and “the middle of nowhere” should alert us that it is a likely candidate for future gentrification projects and real estate speculation.

Describing the different kinds of attachment residents have to where they live sheds light on the stories we tell about gentrification and how attachment to a neighborhood helps to orient those narratives. In Williamsburg, attachment style impacted how residents organized, claimed space, and came to symbolically own their neighborhood; it mattered for how they perceived social disorder, their use of and expectations for neighborhood retail, and their perceptions of the neighborhood’s past and future.

The tracing of Williamsburg’s contemporary history alongside the perceptions of residents who have lived there over the course of four decades highlights how the wounds of disinvestment are interpreted in disparaging ways by in-movers, media, and the city. These narratives neatly set up a justification for state-led gentrification, a mechanism for politicians to provide incentives and breaks to the real estate developers who buoy their political campaigns.

In its wake, existing populations of residents experienced surveillance, a diminished sense of belonging, and cultural and physical displacement. Looking at the complexities of gentrification and neighborhood attachment will help us to expose the myths of state-led change, preparing residents, community organizers, and progressive urban leaders in their fights for equitable cities.

Unimaginative strategies for urban growth give rise to “Williamsburgs” around the world. Popular neighborhoods increasingly have predictable mixtures of cocktail bars, breweries, public art, coffee shops, and boutiques. If the retail, amenities, and luxury housing of Williamsburg’s gentrification are recognizable elsewhere, so are its problems.

The emptied warehouse districts and loss of jobs, the clearing away or incarceration of unhoused people, the Airbnb takeover of housing, the physical displacement through skyrocketing land value, the pricing out of subcultural or artist scenes, the erasure of existing residents and cultures through the repeated narrative that there was nothing or nobody there – these are observed globally as well.

The goal of the Where Is Williamsburg? app, developed in 2016 to identify the world’s hip urban locales, is to never be too far from home thanks to data from users “exactly like you.” It is a promise of homogeneity, predictability, and consistency, an urban-lite experience that makes global cosmopolitans feel safe and comfortable. Developers, politicians, and corporate entities are all too eager to oblige these ideals.

The spell of homogeneous cities and displaced populations can be broken. Neighborhoods must be revitalized with public investment, housing security, and input from existing residents. Historically divested places need to be rebuilt in restorative ways that focus on uplifting existing communities. We must drop these narratives of “empty nowheres” and the privileging of gentrifiers’ perspectives at the expense of everyone else. If we fail to protect and honor existing cultures, residents, jobs, institutions, and histories, then there really will be nothing there.

Sara Martucci is a lecturer in sociology at the John Jay College of Criminal Justice, City University of New York. This piece is excerpted, with light adaptations, from her recent book There Was Nothing There: Williamsburg, the Gentrification of a Brooklyn Neighborhood, published by New York University Press.

10/21/2024

RE: OVER BUILDING ON STATEN ISLAND.

DEAR MR. MAYOR:

PLEASE DO NOT BUILD APARTMENT BUILDINGS ON STATEN ISLAND. THERE IS NO ROOM FOR MORE PEOPLE - MORE CARS + MORE CONGESTION. IF YOU DON'T BELIEVE IT, PLEASE COME AND DRIVE ON STATEN ISLAND ANY DAY FROM 2 PM ONWARDS AND TRY TO GET TO NEW JERSEY FOR DINNER.

THANK YOU -

DEAN + LISA KROPP



SI, NY 10301

[EXTERNAL] Oppose The CITY of YES

Debbie H <[REDACTED]>

Wed 10/23/2024 10:23 AM

To: Land Use Testimony <landusetestimony@council.nyc.gov>;

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The City of Yes plan, a 1 glove fits all agenda, is a poor fit for our community. This proposal will put additional burden on already overwhelmed infrastructure in flood prone areas. Place stress on already overcrowded and many underperforming schools. In most situations increased population and density will jeopardize public safety. Our police force, fire department, EMS, health and human services cannot withstand additional work loads. This aggressive plan will remove parking mandates for new development projects. Our car- centric, low density R 1 - R 5 neighborhoods are already parking deprived. A housing crisis is the alleged reason for this over reaching plan. However, allowance of tens of thousands of new entrants to our city while there is a crisis is akin to strategically placing additional holes in a sinking ship. New York City cannot maintain their sidewalks Over 9,000 sidewalks damaged by tree roots await repair. The repair wait list exceeds 5 years. New York City

please fix what you have before adding more. Go back to the drawing board and do a district by district assessment. Determine which fingers properly fit the gloves and bring a modified product back to the respective council members and their constituents for approval. Force feeding creates a gag reflex. This plan in its current state is not digestible for many New Yorkers. Thank you in advance for your anticipated cooperation.

Regards,
Debbie Higgins



[Bronx, NY 10465](#)

[EXTERNAL] NO TO CITY OF YES

debby stuart <[REDACTED]>

Wed 10/23/2024 10:58 AM

To: Land Use Testimony <landusetestimony@council.nyc.gov>;

Cc: debby stuart <[REDACTED]>

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NO TO CITY OF YES

[Yahoo Mail: Search, Organize, Conquer](#)

From: [Deb McCleary](#)
To: [Land Use Testimony](#)
Subject: [EXTERNAL] Lift Parking Requirements
Date: Tuesday, October 22, 2024 7:25:27 PM

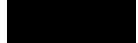
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I support lifting parking requirements for all of NYC and its boroughs. It's mind-blowing that NYC is still focused on providing parking for people in a city where most of us walk, Citibike, or take transit. NYC is embarrassingly far behind other big cities in terms of providing modern, reliable transit, hardened bike lanes, and generally welcoming spaces for all New Yorkers and visitors. Parking requirements are absurd.

Vickie Paladino should move to the suburbs where she can be surrounded by parking lots and cars. The rest of us would like to reduce the number of polluting cars in the city and encourage people NOT to own them.

Sincerely,

Debora McCleary



NY NY 10024

[EXTERNAL] City of Yes

Deborah Gieringer < >

Wed 10/23/2024 1:41 PM

To: Land Use Testimony <landusetestimony@council.nyc.gov>;

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I am opposed to the City of Yes for Housing Opportunity for all the reasons already given by my neighbors in Beverley Square West who oppose it.

Deborah Gieringer

From: [Deborah Mutnick](#)
To: [Joseph, Rita](#); [Desouve, Joel](#); [Land Use Testimony](#); [Speaker Adams](#)
Subject: [EXTERNAL] Testimony on Zoning for Housing Opportunity
Date: Friday, October 25, 2024 12:38:17 PM
Importance: High

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October 25, 2024

To Whom It May Concern:

I oppose the City of Yes for Housing Opportunity amendment. My family and I live in Flatbush Prospect Lefferts Gardens where many blocks are not yet landmarked. Our block enjoys community and connections with its neighbors, some of whom have been residing here for well over 40 years. There is a strong commitment to the community among longtime and recent homeowners and apartment dwellers. And there is great value in a neighborhood that works to protect all residents from forced displacement, skyrocketing rents and prices, and other consequences of upscale, unfettered real estate development.

We oppose the Zoning for Housing Opportunity amendments and request that Council Members vote "No." These amendments are not ideal. As you are aware, there is not a need for further upzoning to create housing or affordable housing; rather, there is a need for "right zoning" to preserve the stability of our residential community, historic architecture and ensure that population density does not overwhelm infrastructure, including sewers, public schools, parking, sidewalks, subways and sanitation.

Please support community-based planning to allow local community boards and council members to determine where and whether zoning or parking waivers are appropriate in exchange for affordable housing or other community benefits and mitigation of environmental effects. Adding density or reducing parking is appropriate in different places in different communities. Most of District 9 is covered by R6 and R7 zoning that would receive massive density increases, leading to the demolition of most of our neighborhood, with current tenants having to leave and wait years before competing with the rest of the city in a lottery for new apartments.

Support non-zoning, affordable housing strategies, especially affordable housing preservation. According to the city planning equitable development data explorer, 2/3 of Community District 9 dwelling units are in rent stabilized buildings. In addition, over 25,000 units of buildable housing remain possible under the current zoning.

Thank you for your attention.

Your constituent,

Deborah Mutnick

Deborah Mutnick
[REDACTED]
Brooklyn, NY 11225

Deborah Mutnick
Professor of English
Chair, Humanities Department
[REDACTED]
[REDACTED]
[REDACTED]

[EXTERNAL] Support City of Yes

Deenie Bugge <

Wed 10/23/2024 10:41 AM

To: Land Use Testimony <landusetestimony@council.nyc.gov>;

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I'm writing today to express my strong support for lifting parking mandates citywide as part of the City of Yes for Housing Opportunity.

I have watched as cars slowly and surely suffocate NYC; our quality of life is suffering. Growing up in the Bronx, I took the bus with my grandmother everywhere we needed to go. Now, I cannot rely on the bus to go anywhere. Buses are stuck in traffic and stuck behind double parked cars. Buses crawl. Riders cannot get to work reliably or make it to appointments on time. Cars are crowding our streets to the point that we are now the most gridlocked nation in the world.

Minimum parking requirements place parking over people. Parking mandates make the city less livable and walkable. Parking mandates encourage car ownership and constrain housing developers.

We do not need more parking. We need a city where residents can walk easily and safely, take the bus reliably, and use the subway system. If the bus and subway do not serve certain areas of outer boroughs adequately, then let's make that happen. Let us focus on what makes a city a city; people, not cars.

I strongly support lifting parking mandates citywide as a critical step towards building more affordable housing and improving quality of life in this traffic choked city.

Thank you
Deenie Bugge



Brooklyn NY 11215

[EXTERNAL] City of Yes

Deirdre Noonan <



Fri 10/25/2024 5:04 PM

Inbox

To: Land Use Testimony <landusetestimony@council.nyc.gov>;

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Ny name is Deirdre Noonan, i own my home at [REDACTED] I am opposed to the City of Yes due to concerns about an adequate water supply and enough electrical power. We are subject to brown out and over burdened circuits already.

I have spent my most of my life living in Queens. As Queens resident, I enjoy my residential community. Cars are necessary to take bring my family to medical appointments and chemotherapy treatments.

I oppose The City of Yes!

A concerned citizen,
Deirdre Noonan

From: [Delia Kulukundis](#)
To: [Land Use Testimony](#)
Subject: [EXTERNAL] In support of removing parking mandates
Date: Friday, October 25, 2024 10:35:38 AM

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My name is Delia Kulukundis. I live in Queens and I own a car, and I support the City of Yes proposal including the elimination of parking minimums. No business or developer should be required to build parking, but they should be free to decide how much parking (if any) would best serve the needs of their future business or project. Minimum parking requirements are outdated and have no place in New York City. Another thing that has no place in New York City: the discriminatory statements by Councilmember Paladino. Everyone who lives here has a right to participate in the process of improving our city. I urge the Council to approve the City of Yes proposal and eliminate minimum parking requirements.

From: [Denise Matranga](#)
To: [Land Use Testimony](#)
Subject: [EXTERNAL] Opposition to City of Yes
Date: Friday, October 25, 2024 10:03:57 AM

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To whom it may concern,

Please recognize that the City of Yes proposal is not appropriate for my East Bronx neighborhood & our beloved NYC as well. Upon much review and analysis of the extensive text it is apparent that permitting & promoting such development will adversely impact our communities. Here's are some reasons: The current infrastructures in NYC are inferior, insufficient and not well maintained. Sewer backups are frequent in our homes! We need more front, rear and side yard green space to absorb rain water, not less. No one wants deal with issues from a neighbors ADU that is right next to their backyard.

There is an insufficient number of school seats for the current students.

The health and hospital resources are inadequate, especially in the Bronx. I have experienced inhumane wait times & unacceptable treatment at Montefiore Einstein ER with my aged mom. The law enforcement staffs across the city are insufficient. Inspector Johnny of our 45th Precinct, says that they need many more officers as many crime categories have increased dramatically.

The current parking situation is unacceptable. There is insufficient street parking and municipal lots. Our local commercial strips are suffering, as many Bronx residents drive to neighboring Westchester shops and businesses that provide ample parking.

Please help keep NYC viable for as all Including the middle class. I want to keep my family in the Bronx. So many residents have moved to the suburbs recently to avoid the issues encountered with overdevelopment.

As the proposal stands, it will further degrade the quality of life in NYC.

Please revise this proposal!

Sincerely

Denise Matranga

[REDACTED]

Bronx, New York 10465

[EXTERNAL] City of Yes for Housing Opportunity

Dennis Huang <[REDACTED]>

Fri 10/25/2024 11:06 PM

To: Land Use Testimony <landusetestimony@council.nyc.gov>;

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Dear Land Use Committee of the NYC Council,

I appreciate the opportunity to provide input on the City of Yes proposal. After reading through it, I write to express my disapproval of this plan, urge you to make amendments immediately, and if unable to make changes then you should vote No on the plan.

Indeed, New York City has a housing crisis. We desperately need affordable housing but your plan does not *mandate* any units that are within the reach of the working class New Yorker. It is simply so frustrating to see units available on NYC Housing Connect but not being able to even meet the income requirements for them. When will the city leverage its power and use it to stand up for the people instead of with the wealthy and powerful? Stronger enforcement mechanisms are necessary to ensure affordability such that developers are not prioritizing building market-rate and luxury housing that working class New Yorkers cannot conceivably afford.

I have lived in Manhattan for many years, but eventually moved to Flushing, then Bayside, and now Bellerose. These are diverse neighborhoods with significant minority populations that have made their homes here such as Asian Americans in Northeast Queens and Blacks in Southeast Queens. You write that lower density neighborhoods must contribute more to the city in terms of housing production but the city is simply not doing in its duty to serve lower density neighborhoods. The infrastructure will undoubtedly be burdened whether it is the crowded schools we face in Eastern Queens, crowded buses due to the lack of the subway in our neighborhoods, and challenges related to climate such as flooding during storms such as Ida. According to the city comptroller's findings, low-density neighborhoods like ours pay three times the effective tax rate than residents in Manhattan and Brownstone Brooklyn. Asking our neighborhoods to do more when we don't receive as much from our city government as other neighborhoods do simply is not fair. Your "City of Yes" plan needs to comprehensively address infrastructure which it simply does not consider. If you are unable to do this, then I would simply recommend removing areas such as mine in Eastern Queens from your "City of Yes" plan and targeting areas that can accommodate more such as those with a subway station right in their backyards.

Throughout your presentation, you frequently discussed lifting parking mandates. This does make

sense in areas that are already proximal to the subway such as Manhattan and Downtown Brooklyn, but it simply does not make sense in Eastern Queens. Buses, like I expressed before, are crowded and the MTA has shown no sign of adding more. We do have the Long Island Railroad in Bellerose but that charges a much higher fare (Zone 4, outside of the MTA's CityTicket program) and the majority of the trains skip our station, rendering service difficult to use. The express buses that bring people to Manhattan are very limited, expensive, and the target of service cuts by the MTA in their latest bus redesign project. With our transit challenges, I would only recommend lifting parking mandates for areas that are within 1/4 mile of the subway station (therefore the preservation of parking mandates in areas such as mine in Eastern Queens) and the additional construction of municipal parking lots to ensure availability for those who need it to get into the city.

New York City is a great place to live not just because of the diversity of the people you meet but also because of the diversity of our neighborhoods. If you want a dense environment and large apartment housing, you've got it in Manhattan and much of Brooklyn. If you want more open spaces and one to two family housing, you've got it in Eastern Queens and Staten Island. There is something that will fit people's living preferences and I would like others to have this same choice to make when they come to our city. Unfortunately, I believe City of Yes unilaterally imposes the will of those who want more density against those who want lower density. That is why context is significant, which your plan simply ignores and states instead that higher density is required everywhere in the city. Listening to others, taking their feedback, and incorporating it is a sign of strength and a sign that you are working for the people. A sign of weakness and a sign that something is off would be refusing to listen and badmouthing opponents in a press conference which to my dismay has been done by some of the proponents of the City of Yes.

I hope to see a final product that reflects the unique situation and needs of every part of the city. As our public advocate Jumaane Williams stated in his informative and reflective testimony, we would like to see our city government working for the people and making the appropriate amendments and changes to the City of Yes plan. If you are unable to do this, then I believe you should vote No on this plan.

Thank you for the chance to provide testimony.

Best,
Dennis Huang

[EXTERNAL] Fw: City of Yes

Discover <



Fri 10/25/2024 5:32 PM

To: Land Use Testimony <landusetestimony@council.nyc.gov>;

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Ny name is Dennis Noonan, i own my home at [REDACTED] I am opposed to the City of Yes due to concerns about an adequate water supply and enough electrical power. We are subject to brown out and over burdened circuits already.

I have spent my entire life living in Queens. As Queens resident, I enjoy my residential community. Cars are necessary to take bring my family to medical appointments and chemotherapy treatments.

I oppose The City of Yes!

If you like what we do then tell somebody
If you don't like something we did then tell me

Dennis Noonan
Director of the Glen Oaks
Challenger Division

[EXTERNAL] Testimony in SUPPPORT of City of Yes for Housing Opportunity

Diana Finch <

Fri 10/25/2024 11:35 PM

To: Land Use Testimony <landusetestimony@council.nyc.gov>;

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My name is Diana Finch, I am a 32-year resident of The Bronx and a 46-year resident of New York City.

I am in support of City of Yes for Housing Opportunity because I remember how crucial it was, when I moved to New York in my early twenties after college, to be able to find an apartment for a rent I could afford on a starting salary in book publishing that allowed me my own bedroom and a reasonable commute to work. It is a much greater struggle today for young people moving here for the sake of careers in industries centered in New York City, especially cultural and arts industries, to find places to live that they can afford.

I am in support of City of Yes for Housing Opportunity because as a Board Member of our local Bronx Park East Community Association, I know that a top issue our community members want to discuss at every meeting is housing: How to find housing for a rent they can afford, how they and their adult children and other relatives can find places to live that will allow them to stay in the neighborhood.

I know that to preserve the New York City we all love and cherish - as a city that can welcome newcomers from all over the world who come here because of all the city has to offer and because of what they can give back to it when they flourish here, as a city that can nurture many generations of families who base their identity here - we need the additional housing, a little bit more and everywhere, that City of Yes for Housing Opportunity will bring us.

I regret that opponents have fallen for exaggerated and even totally false claims about City of Yes for Housing Opportunity, chief among them the fear that all the construction allowed by this text amendment is going to take place, and that it will happen all at once, and as soon as it is passed.

Or that COYHO will ignore and even pre-empt building codes, permitting rules, and environmental impacts. No zoning ignores or pre-empts these independent regulations.

If the things that COY opponents believe were actually true, I would not be in support either.

I hope that the Subcommittee on Zoning and Land Use, the Land Use Committee, and entire City Council do not weaken any of the interrelated provisions of COYOH. One of the most important provisions is the elimination of parking mandates - which does NOT mean the elimination of indoor or outdoor parking in new construction, as so many opponents seem to think. Parking mandates keep costs high for builders, limiting how many affordable units they will include, and sometimes whether they will build at all.

But **what I know from direct experience is that rented parking spaces in new buildings are NOT AT ALL essential.** In the 12-square-block R-7 area that Bronx Park East Community Association advocates for, there have been 10 new 6-story buildings built in the past two or three years, each replacing a one- or two-family house or an empty lot.. On-street parking spaces are very tight in this area, even before these new buildings came - although we are located between two subway stops, Pelham Parkway and Allerton Ave on the 2 line, and it is at most a 5-minute walk from the nearest one. A couple of months after one of these new buildings opened on Bronx Park

East, its management was advertising their parking spaces for rent to the wider community, because they could not fill them just by renting to their new tenants. Months later, they still have not rented all the spaces.

So please do not insist that parking mandates be required in New York City zoning regulations. Paid parking spaces in new buildings at the levels currently mandated are NOT desired or needed by New Yorkers who live near mass transit - as the experience of The Bronx Park East community proves.

Thank you for considering my testimony, and please pass City of Yes for Housing Opportunity.

Diana Finch

[REDACTED]

Bronx NY 10467

City Council District 15

[REDACTED]

[REDACTED]

[EXTERNAL] City of Yes for Housing Opportunity Objection/Opposition: Ditmas Park West Neighborhood Association

Ditmas Park West Neighborhood Association <

Fri 10/25/2024 10:55 PM

To: Land Use Testimony <landusetestimony@council.nyc.gov>;

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The following letter was developed in July with input from almost 200 members of the Ditmas Park West Neighborhood Association.

DITMAS PARK WEST NEIGHBORHOOD ASSOCIATION

We join in the **objection / opposition to the City of Yes ("COY") proposals** regarding R1-R5 zoning.

We do not oppose all aspects of the City of Yes proposal; we understand and support neighborhood appropriate initiatives aimed at increasing housing. For instance, many of our residents strongly support implementing Town Center zoning.

We would like to add some further objections:

Process: We are of the mind that we are chasing a runaway train. There was no effective communication to the public about this massive change in zoning of R1-5 areas. A number of members of our board first found out about this in July 2024. The City is somehow able to send mass mailings for all sorts of information (e.g., recycling events, composting, elections, etc.), but for some reason(s) it did not see fit to do so for the COY. Community Board 14 does its best to disseminate information, but this is not a substitute for informing the public about something so fundamental about our way of life. The COY proposals now being considered require further and more expansive explanations by City Planning, including meetings with affected neighborhoods, not just limited public meetings at community boards.

2009 Flatbush Rezoning: The COY takes a one-size fits all approach across the City, without consideration of differences among neighborhoods. It seems to us that consideration of environmental impacts has been cursory. Indeed, and most dramatically, the COY utterly fails to account for the 2009 Flatbush Rezoning ("2009 FR"). That was our city of yes. In stark contrast to the COY, the 2009 FR was well thought out as regards our neighborhood and the greater Flatbush area. It was the product of all the various interested parties coming together in good faith and reaching a community-wide consensus of what was best for our area of New York City, while recognizing the need for affordable housing. It was the product of meaningful public engagement. Unlike the COY, there was no contentiousness when the 2009 FR was enacted. At the June 3, 2009, public hearing at the City Planning Commission for the 2009 FR, 22 people spoke in favor. No one spoke in opposition.

As an essential part of the 2009 FR, Coney Island Avenue was upzoned. As a result of our efforts then, Coney Island Avenue is now being developed with new apartment buildings, and there are many more opportunities there for growth. The 2009 FR was also undertaken to strengthen our commercial corridors.

As a result, Cortelyou Road has become a destination and Newkirk Avenue has been revitalized. By way of the 2009 FR, Victorian Flatbush, which is the soul of this community and an economic engine, was preserved for future generations. It preserved certain neighborhoods, like DPW (all zoned to R3x) and Beverley Square West, for potential landmark designation, which the Landmark Preservation Commission (after surveying the neighborhood) indicated was worthy of future consideration. The beauty of Victorian Flatbush is a (perhaps the) major reason people want to live in and around us, and this in turn supports the local businesses. As noted in the WMNA letter, it is Victorian Flatbush residents who created and have supported Flatbush Development Corporation, thereby supporting surrounding communities.

We believe the COY poses an unnecessary and gratuitous threat to Victorian Flatbush, which was protected by the 2009 FR. The COY is a betrayal of our good will and the efforts our community made only 15 years ago. The COY pulls the rug out from under us. Frankly, and unfortunately, it says to us that City Planning cannot be trusted.

Thank you for your consideration of our position.

Ditmas Park West Neighborhood Association

cc: Dan Garodnick, Chair, NYC Planning Commission
City Councilmember Rita Joseph, District 40
Borough President Antonio Reynoso

From: [Dolores Stimitz](#)
To: [Land Use Testimony](#)
Subject: [EXTERNAL] City of Yes
Date: Friday, October 25, 2024 6:33:32 AM

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The City of Yes does not consider the diverse needs of our city's communities.
For this reason, I oppose the City of Yes which will wreak havoc on
my neighborhood.

--

Dolores Stimitz

From: [montauk1dr](#)
To: [Land Use Testimony](#)
Subject: [EXTERNAL] City of Yes Housing
Date: Friday, October 25, 2024 10:41:26 AM

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I am vehemently opposed to the City of Yes Housing bill. It will only enrich developers while destroying the pleasant neighborhoods that we live in. Our infrastructure cannot support "just a little bit more". Cookie cutter proposals like this one do not deserve to see the light of day.

Please do not destroy the environment we have worked hard to earn and build.
Thank You.
Domenick Ranieri
Bayside, Queens

From: [Dominic](#)
To: [Land Use Testimony](#)
Subject: [EXTERNAL] Lifting parking requirements
Date: Wednesday, October 23, 2024 8:55:47 AM

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Hello,

A harlem resident writing in support of lifting parking requirements.

Best,
Dominic Scheidegger

From: [dominicopizzo \(null\)](#)
To: [Land Use Testimony](#)
Subject: [EXTERNAL] City Of Yes
Date: Friday, October 25, 2024 7:57:38 AM

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To Whom it May Concern:

The City of Yes plan, a 1 glove fits all agenda, is a poor fit for our community. This proposal will put additional burden on already overwhelmed infrastructure in flood prone areas. Place stress on already overcrowded and many underperforming schools. In most situations increased population and density will jeopardize public safety. Our police force, fire department, EMS, health and human services cannot withstand additional work loads. This aggressive plan will remove parking mandates for new development projects. Our car- centric, low density R 1 - R 5 neighborhoods are already parking deprived. A housing crisis is the alleged reason for this over reaching plan. However, allowance of tens of thousands of new entrants to our city while there is a crisis is akin to strategically placing additional holes in a sinking ship. New York City cannot maintain their sidewalks Over 9,000 sidewalks damaged by tree roots await repair. The repair wait list exceeds 5 years. New York City please fix what you have before adding more. Go back to the drawing board and do a district by district assessment. Determine which fingers properly fit the gloves and bring a modified product back to the respective council members and their constituents for approval. Force feeding creates a gag reflex. This plan in its current state is not digestible for many New Yorkers.

Dominico Pizzo


Bronx, NY 10465

Sent from my iPhone

[EXTERNAL] Lift Parking Mandates

Donald Rasmussen < >

Tue 10/22/2024 10:51 PM

To: Land Use Testimony <landusetestimony@council.nyc.gov>;

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Hi,

The city of New York needs to lift/eliminate parking mandates. We have many public transit options and building housing with parking encourages car ownership. Eliminating parking mandates will reduce the cars on the roads and help the climate.

Thanks,
Donald Rasmussen, resident of Bushwick

From: [Donna Cirillo](#)
To: [Land Use Testimony](#)
Subject: [EXTERNAL] City of Yes Opposition
Date: Wednesday, October 23, 2024 7:26:32 AM

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All of the opposition from the Boards should be the answer you need to vote NO on the City of Yes. You will be going against the will of the people. In particular, Howard Beach has flooding issues that have not been rectified, and no serious plans exist to fix this. Please remember how Howard Beach residents were left to fend for themselves during Hurricane Sandy and more housing built in this area will make the situation even worse.

Please keep this in mind when you vote.

Thank you.

Kind regards,

Donna Cirillo

From: [Donna DeRosa](#)
To: [Land Use Testimony](#)
Subject: [EXTERNAL] city of Yes
Date: Friday, October 25, 2024 9:17:53 AM

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Sent from my iPad

Twenty-eight years ago my husband and I found our forever home in Bayside Hills/Oakland Gardens. The streets were tree-lined, quiet and family oriented. Perfect!

Now this re-zoning proposal is unacceptable. We already have “McMansions” being built, hidden rentals, trees being removed and walls being built around us. Not to mention the abundance of unused bicycle lanes taking parking spaces.

This proposal would be the final straw for my family to leave New York. “NO” to the city of yes! Thank you

From: [DONNA GIBSON](#)
To: [Land Use Testimony](#)
Subject: [EXTERNAL] City of yes housing
Date: Wednesday, October 23, 2024 5:28:25 PM

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No to city of yes
Preserve City Island Special District zoning.
Donna Gibson
City Island Resident
***** I respectfully vote NO!! *****
Sent from my iPhone

From: [Donna Pandolfo](#)
To: [Land Use Testimony](#)
Subject: [EXTERNAL] Oppose city of yes
Date: Thursday, October 24, 2024 8:51:16 PM

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Donna Pandolfo
[REDACTED], Bronx, NY 10465

[EXTERNAL] 50 Story Building FH

Doris El-Masry <[REDACTED]>

Wed 10/23/2024 1:21 PM

To: Land Use Testimony <landusetestimony@council.nyc.gov>;

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Hello-

I am in opposition to the building of a 50 story apartment buildings in our neighborhood.

Please know that many people including myself are opposed to any change of zoning laws.

Please DO NOT change the Zoning Laws!

FH is a beautiful neighborhood & we don't want the landscape of this community changing!!

Regards,
Doris El-Masry
FH resident since 1991

Sent from my iPhone

From: [Doris He](#)
To: [Land Use Testimony](#)
Subject: [EXTERNAL] written testimony for city of yes
Date: Wednesday, October 23, 2024 8:39:23 AM

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Dear Sir or Madam,

My name is Doris He, and I live in Upper West Side of Manhattan.

I am submitting this testimony because I live in NYC and am paying a lot for housing.

Myself, friends and family often have to move around, or even leave the city because of the cost of living.

I am really excited about the “City of Yes for Housing Opportunity” initiative, and I hope the Council Members approve this proposal in its strongest possible form. New York City neighborhoods hasn't had many new housing additions in the past years. “City of Yes” is a real proposal to fix that, so we can add a little more housing to every neighborhood and provide new opportunities for New Yorkers to live in all types of areas.

I also want to focus on one topic from the initiative that I am most excited about [Office-to-Residential](#) conversions. We are seeing lots of empty office buildings post pandemic as many companies remains a remote or hybrid work arrangement, and many companies have their offices moved out of the city. As the demand for spaces have shifted from office space to residential space, the outdated zoning is preventing the usage of spaces to follow the change in demand. *By passing the zoning changes to allow these conversion*, we can not only provide more housing to meet the demand, but also create more active, vibrant neighborhoods, helping small businesses who have been hurt by reduced office foot traffic. The State also included a program in the budget to pay for affordable housing in office-to-residential conversions. The City needs to pass these zoning changes so we can take advantage of these benefits and get new affordable housing in our community. Simplifying the office conversion rules and allowing new housing across the city where it makes sense is a great step forward.

Thank you for reading my testimony and have a great day!

Best,
Doris

From: [Doris He](#)
To: [Land Use Testimony](#)
Subject: [EXTERNAL] written testimony for city of yes
Date: Wednesday, October 23, 2024 8:39:23 AM

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Thank you for reading my testimony and have a great day!

Best,
Doris



To Whom it May Concern:

The City of Yes plan, as it stands... is a poor fit for our Borough and our Mixed use, Low density community especially.

This proposal will:

- Put additional burden on already overwhelmed infrastructure
 - Black out/brown outs in hot weather
 - Add to flood prone areas
 - Burden overcrowded and many underperforming schools
 - Increased population and density can jeopardize public safety.
 - Burden Police force
 - Burden Fire department
 - Burden EMS
 - Many Parks are deteriorating
 - Sanitation and DOT roadside cleanups have trouble keeping the Rats at bay.
 - Health and human services cannot withstand additional work loads.
 - Do not remove parking mandates for new development projects.
- Our car- centric (transportation desserts), low density R 1 - R 5 are already parking deprived.
- New York City cannot maintain their sidewalks, over 9,000 sidewalks damaged by tree roots await repair. With the pedestrian and scooter safety at risk. The repair wait list exceeds 5 years.

New York City please fix what you have and add more infrastructure before adding more housing.

A housing crisis is the alleged reason for this overreaching plan. However, the allowance of tens of thousands of new migrants to our city (while there is a crisis) makes the average person question the whole project's logic. This sanctuary status should be stopped if you want us to take NYC seriously. This poorly planned population increase should not be allowed to diminish the safety and quality of life of the existing residents of NYC. Go back to the drawing board and do a district by district assessment. Determine which proposals fit the neighborhood in an equitable way that includes the existing home owner investments then bring a modified product back to the respective council members and their constituents for approval. Demanding that we suffer the consequences of poor planning by our leaders and agencies is just despicable. This plan in its current state does not equitably treat the car dependent/property invested /low density neighborhoods that are low maintenance, important assets to our City.

Thank you in advance for your consideration...

Dorothea Poggi *Dorothea Poggi*



 Bronx, NY 10465

www.ferrypointpark.org

[EXTERNAL] NO to City of Yes



Fri 10/25/2024 9:27 PM

To: Land Use Testimony <landusetestimony@council.nyc.gov>;

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To: All New York City Council Members

As a lifelong Bronx resident and homeowner, I object to the City of Yes for a number of reasons.

Do not consider this proposal put forward by the Eric Adams' administration. The FBI investigation has brought an indictment against Mayor Adams with so many officials resigning or let go.

The City of Yes is contaminated by too many lobbyists and developers tied to Eric Adams. It gives carte blanche to developers who will rake in millions with little return in creation of affordable housing.

Bronxites recall how our hometown, the Bronx, burnt. Developers are wrong to tout they are helping working class New Yorkers; they are helping themselves.

Our infrastructure cannot sustain the tall apartment buildings destined under COY. In many the type of housing will harken back to Jacob Reisa description of inhumane apartments. Some of what is now being built as of right are reminiscent of Soviet era housing.

It would bypass ULURP. Robert Moses permitted no community input and so he gutted the Bronx to build the Cross Bronx Expressway. We do not want history to repeat itself. Many of us stayed and believed in the Bronx. City of Yes would remove community values and inputs.

The one-size-fits-all elements of COY are NOT AFFORDABLE HOUSING.
VOTE THE ENTIRE CITY OF YES DOWN.

Dorothy A. Krynicki

[Sent from AOL on Android](#)

[EXTERNAL] Opposition of the City of Yes



Fri 10/25/2024 2:03 PM

To: Land Use Testimony <landusetestimony@council.nyc.gov>;

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To Whom it May Concern:

The City of Yes plan, a 1 glove fits all agenda, is a poor fit for our community.

This proposal will put additional burden on an already overwhelmed infrastructure in flood prone areas. It will place stress on already overcrowded and many underperforming schools.

In most situations increased population and density will jeopardize public safety. Our Police force, Fire department, EMS, Health and Human services cannot withstand additional work loads.

This aggressive plan will remove parking mandates for new development projects. Our car- centric, low density R 1 - R 5 neighborhoods are already parking deprived.

A housing crisis is the alleged reason for this over reaching plan. However, the allowance of tens of thousands of new entrants to our city while there is an existing crisis is akin to strategically placing additional holes in a sinking ship.

New York City cannot maintain their sidewalks Over 9,000 sidewalks damaged by tree roots await repair. The repair wait list exceeds 5 years.

New York City please fix the current issues before adding more stress on an already burdened city.

Go back to the drawing board and do a district by district assessment. Determine which fingers properly fit the gloves and bring a modified product back to the respective council members and their constituents for approval.

Force feeding creates a gag reflex. This plan in its current state is not digestible for many New Yorkers.

Thank you in advance for your anticipated cooperation.

Respectfully

Doroth Buzzeo



Bronx, NY 10465

[Sent from the all new AOL app for iOS](#)

From: [Dr. Vera Daniels](#)
To: [Land Use Testimony](#)
Subject: [EXTERNAL] City of Yes
Date: Friday, October 25, 2024 8:46:31 AM

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VOTE NO! TO THE CITY OF YES! PRESERVE OUR AMERICAN DREAM, SMALL BUSINESS OWNERSHIP, THE QUALITY OF OUR LIVES!

NO! NO! TO THE CITY OF YES...

Dr. Vera V. Daniels

“Success is Never Giving Up...—”

[EXTERNAL] No



Wed 10/23/2024 10:10 AM

To: Land Use Testimony <landusetestimony@council.nyc.gov>;

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I am a queens resident I am highly opposed to city of yes. Pleas vote no. Keep our neighborhoods how they are

[Sent from the all new AOL app for iOS](#)

[EXTERNAL] I support lifting Parking Mandates and City of Yes:
Housing Opportunity.

dylan miles



Wed 10/23/2024 2:02 PM

Inbox

To: Land Use Testimony <landusetestimony@council.nyc.gov>;

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Please do not water down the supply-unleashing land use reforms in the City Of Yes package, very much including the parking mandates.

From: [REDACTED]
To: [Land Use Testimony](#)
Subject: [EXTERNAL] City of Yes / objection
Date: Thursday, October 24, 2024 4:33:42 PM

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There is nearly \$1 BILLION in unpaid DOB/ECB violations. NO new zoning or related regulations, including COY, should even be considered until that unpaid money is collected and the "8-year *write off*" clause* (*see below) in the City Charter is removed. There needs to be an immediate, combined City Council & State Assembly hearing about why DOF isn't taking aggressive, sustained collection action.

Ed Jaworski
past president, Madison-Marine-Homecrest Civic Association, member CB15
Brooklyn, NY

* NYC Charter chapter 45A, re. "Environmental Control Board" section 1049-a(d) (1)
(i) "A judgement entered pursuant to this paragraph shall remain in full force and effect for eight years".

Lynn Schulman - Nyc Council

I oppose the City of Yes Housing proposals because:

All zoning for our one-two family homes must remain in place.

Our neighborhoods in Queens are already dense to capacity. Our homes sit a mere driveway apart and adding additional occupants and structures interferes directly with our quality of life. Our infrastructure- sewer, water, are already beyond maximum capacity. the now permanent pattern of heavy flooding rains can't be handled now and see severe flooding, including loss of life in severe storms. Paving over our green spaces and gardens to accommodate ADUs will only further increase flooding. Our electrical grid in Queens is already over-taxed and Queens neighborhoods have had power outages this summer. Adding houses is not possible. Adding two additional stories to buildings along small shopping streets like Metropolitan Avenue will put mom and pop stores out of business, will cause evictions of current tenants who now have affordable rents, will paralyze these shopping streets during construction, and will inevitably lead to gentrification. This provision must be eliminated.

Construction of apartment buildings in so-called TRANSIT ZONES sitting half a mile from rail or subway will place those buildings directly next to houses to each side and behind them, blocking light, destroying privacy, and destroying neighborhood character. We the people did not buy our homes or envision any of this as being the shape of our future. CITY of YES destroys everything we have worked hard to maintain and is not a serious plan to create affordable housing. Developers are only in to make MONEY, PROFIT. These buildings will be market rate, only a few if any will be affordable housing.

Sincerely,

EDWARD BRENNAN resident of Forest Hills,NY

[EXTERNAL] Resident Feedback on City of Yes

Eddie <[REDACTED]>

Wed 10/23/2024 12:51 PM

To: HousingOpportunity@planning.nyc.gov <HousingOpportunity@planning.nyc.gov>; Land Use Testimony
<landusetestimony@council.nyc.gov>;

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City Council Members,

I am writing to share both my concerns and support for elements of the proposed "City of Yes" initiative. As a fourth-generation New York City taxpayer, small business owner, and current resident of Bushwick, I am deeply invested in the well-being of our city. I believe that while parts of this proposal offer promising solutions, there are also areas where more careful consideration and alternative approaches are needed.

Growing up rent-burdened, I have personally experienced the difficulties of living in a city where rising rents have forced me to move multiple times—even when I worked for an advertising company with a good salary. This struggle continues today as I face the challenges of running a small business while contending with unaffordable housing. Many New Yorkers, like myself, are being priced out of neighborhoods we've lived in for generations, and I fear that the "City of Yes" proposal in its current form could further this problem rather than solve it.

What I Support

1. Revitalizing Office Districts Through Housing Conversions

I strongly support the effort to **convert underutilized office spaces** into affordable housing for legal citizens. This is a sensible way to address both the surplus of vacant office spaces, especially post-pandemic, and the housing shortage. Repurposing office districts can help revitalize areas that have lost their vibrancy while providing much-needed affordable housing. However, it's important that these conversions genuinely prioritize affordability, rather than catering to high-income tenants, and that they are done with care to ensure the infrastructure can support an influx of new residents.

2. Affordable Retail Spaces for Small Businesses

As a small business owner, I also urge the Council to create opportunities for businesses like mine to move into vacant retail spaces at affordable rates. Right now, many retail spaces remain vacant across the city because rents are simply too high. By incentivizing landlords to lease vacant spaces at reasonable rates, we could breathe new life into neighborhoods and help small businesses flourish. This would allow me, and countless others, to relocate or expand, contributing to the local economy and fostering vibrant commercial districts. Small businesses are essential to New York's identity, and this type of initiative could offer real relief to business owners struggling to survive amid soaring costs.

2. Sensible Use of ADUs (Accessory Dwelling Units)

I also support the **rezoning to allow for ADUs**, as they offer a practical way to increase housing without overwhelming existing neighborhoods. ADUs can provide flexible housing options, especially for multigenerational families or individuals who cannot afford larger homes. However, it is critical to implement clear and enforceable regulations to avoid the kind of disorder we saw with the marijuana rollout,

where a lack of structure led to confusion and uneven enforcement. We need firm guidelines to ensure that ADUs do not lead to overdevelopment or disrupt the character of residential neighborhoods.

My Concerns

1. Overdevelopment and Neighborhood Character

While the proposal seeks to address the housing crisis, I'm concerned that blanket upzoning and large-scale development across all neighborhoods will erode the unique character of our communities. New York City's strength lies in its diversity, and implementing a one-size-fits-all approach risks making neighborhoods indistinguishable from one another. Instead, I believe development should be tailored to communities that want and are ready for growth, rather than imposing the same policies across the board.

2. Holding Developers Accountable and Addressing Vacant Units

We've seen developers overbuild luxury units in many neighborhoods while failing to meet their promises of affordability. These luxury units sit vacant, and many New Yorkers, like myself, continue to struggle with rising rents. I believe we should hold these developers accountable and repurpose the many vacant units into affordable housing before greenlighting more large-scale projects. This would provide immediate relief to the housing crisis without displacing long-time residents.

3. Audit NYCHA and Reduce Waste, Fraud & Abuse

The New York City Housing Authority (NYCHA) manages thousands of units that remain vacant or uninhabitable due to delays, inefficiencies, and mismanagement. Auditing NYCHA to identify waste and fraud, and quickly getting these units back on the market, should be a top priority. By addressing these issues within our existing housing stock, we can ease the housing crisis without the need for extensive new development. Did you ever wonder why there are so many nice cars in NYCHA parking lots?

4. Infrastructure and Parking

The city's infrastructure is already overburdened, and adding more housing without significant upgrades to transportation, utilities, and public services will only make this worse. I experience this every day, from long commutes to the difficulty of finding affordable parking. Reducing parking requirements for new developments is not the solution, especially for residents and business owners who rely on vehicles to move goods or commute. Instead, we should be focusing on creative parking solutions and infrastructure improvements that match the pace of housing development.

5. Address Unauthorized Occupants and Resource Allocation

Another immediate step to alleviate the housing crisis is to prioritize resources for legal residents. The presence of unauthorized individuals has strained the housing supply, and ensuring that resources go to those who are lawfully entitled to them would free up valuable space for citizens in need.

6. Promote Affordable Homeownership

While increasing the rental stock is important, I believe that promoting **affordable homeownership** should be a priority. Homeownership provides long-term stability and allows residents to build equity, preventing displacement and fostering stronger communities. Subsidizing homeownership opportunities would give New Yorkers a chance to remain in the city they've called home for generations.

In Conclusion, while I recognize the urgency of addressing the housing crisis, I believe there are more thoughtful and targeted solutions that can help alleviate these issues without sacrificing the character of our neighborhoods or the quality of life for long-time residents. By holding developers accountable, auditing NYCHA, converting vacant office spaces, and implementing sensible zoning policies like ADUs, we can make New York City a place where everyone has the opportunity to thrive.

Thank you for your time and consideration.

Sincerely,
Edward Casano
Ed's Plant Shop LLC

[EXTERNAL] City of Yes



Fri 10/25/2024 5:07 PM

To: Land Use Testimony <landusetestimony@council.nyc.gov>;

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe. Report suspected phishing emails with the Phish Alert Button or forward them to phish@oti.nyc.gov as an attachment.

I am writing to you at this time in opposition to the City of Yes proposal.

In 2019 there was made public the proposal to build of a mixed use development in Flushing, Queens on Kissena Boulevard.

It was probably the worse place to build a mixed use development as it did not take into account the effects on traffic, the overcrowding of schools, and the existing population density, thus paralyzing the neighborhood closest to the downtown Flushing business district.

The developer made multiple offers to the get approval, including offering support for the local NYC councilman's pet projects, suggesting to the auto repair shops opposite the proposed development could be developed onto a mini strip mall, and a local civic group was offered control of the lobby area of the proposed development.

When the traffic pattern was identified as a major hurdle to the new development, the developer offered a bizarre plan to install traffic lights 1/2

block from the major intersection of Kissena Blvd & Holly Avenue, to allow access to the building.

Attached are some references to that project, which was withdrawn by the developer when it became apparent that it would not be approved.

The removal of the guardrails to approve future projects will result in similar disastrous projects such as 'Kissena Center', to become reality.

<https://newyorkyimby.com/2019/01/major-new-mixed-use-development-revealed-at-46-15-kissena-boulevard-in-flushing-queens.html>

https://www.qchron.com/editions/north/cb-7-votes-against-major-kissena-project/article_b7b17de5-4a45-5b3b-bcce-556feb03998b.html

<https://queenscrap.blogspot.com/2019/07/developer-denied-finally.html?m=1>

https://archive.citylaw.org/council/wp-content/uploads/sites/30/council/year_2019/Res-1012-2019.pdf

Regards,

Edward V. Chin



Sent from my Verizon, Samsung Galaxy smartphone

From: [Eve poppiti](#)
To: [Land Use Testimony](#)
Subject: [EXTERNAL] The City Of Yes Plan
Date: Wednesday, October 23, 2024 9:17:36 AM

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To Whom it May Concern:

The City of Yes plan, a 1 glove fits all agenda, is a poor fit for our community. This proposal will put additional burden on already overwhelmed infrastructure in flood prone areas. Place stress on already overcrowded and many underperforming schools. In most situations increased population and density will jeopardize public safety. Our police force, fire department, EMS, health and human services cannot withstand additional work loads. This aggressive plan will remove parking mandates for new development projects. Our car- centric, low density R 1 - R 5 neighborhoods are already parking deprived. A housing crisis is the alleged reason for this over reaching plan. However, allowance of tens of thousands of new entrants to our city while there is a crisis is akin to strategically placing additional holes in a sinking ship. New York City cannot maintain their sidewalks Over 9,000 sidewalks damaged by tree roots await repair. The repair wait list exceeds 5 years. New York City please fix what you have before adding more. Go back to the drawing board and do a district by district assessment. Determine which fingers properly fit the gloves and bring a modified product back to the respective council members and their constituents for approval. Force feeding creates a gag reflex. This plan in its current state is not digestible for many New Yorkers. Thank you in advance for your anticipated cooperation.

Elba Poppiti



Bronx NY 10461

From: [Elias Mechaber](#)
To: [Land Use Testimony](#)
Subject: [EXTERNAL] City of Yes for Housing Opportunity
Date: Wednesday, October 23, 2024 4:26:21 PM

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I'm writing to wholeheartedly express my support for removing parking mandates from the City's building code. This is a common sense solution to reduce development costs and increase housing supply to address the crushing rental cost crisis in the city.

Thank you,
Elias

[REDACTED]
Brooklyn, NY 11217

Elias Mechaber
[REDACTED]

From: [Elinor Agee](#)
To: [Land Use Testimony](#)
Subject: [EXTERNAL] City of YES HOUSINGF AUTHORITY
Date: Wednesday, October 23, 2024 5:40:33 PM

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I am opposed to the YES HOUSING AUTHORITY OPPORTUNITY. Elinor Agee

October 22, 2024

Elisa S. Koenderman



Forest Hills, NY 11375-5103

Adrienne E. Adams, Speaker
New York City Council
City Hall
New York, NY 10007

Re: Testimony in Opposition to City of Yes for Housing Opportunity

Dear Speaker Adams and City Council Members,

I am a lifelong resident of the neighborhood of Forest Hills, Queens where I and my husband have owned a single-family home for more than thirty years.

Our neighborhood is comprised of mainly single-family homes with lawns and gardens on tree-lined streets. Although within walking distance of the subway and a twenty-minute ride to Manhattan, it has a low-density population and ample light, air and space, particularly green space. Its shopping districts, comprised of mostly one- and two-story buildings, contain many small businesses which, like the residents who patronize them, have been there for decades. We chose to live here precisely because our neighborhood offers proximity to the urbanity of Manhattan, while maintaining the look and feel of the suburbs.

The ill-conceived, “one-size fits all” City of Yes for Housing Opportunity proposal would utterly destroy all that. The overdevelopment guaranteed by this proposal – the replacement of single-family homes and single-story businesses with multi-unit and multi-story dwellings – would subsume our light, air and space, including precious green space; strain the already overburdened infrastructure; and increase crowding, traffic congestion, pollution and garbage on our streets. Ultimately, the proposal will displace our current residents and merchants, who will be forced out of their homes and businesses in a neighborhood which will be unrecognizable as the one in which they chose to live and work. Tragically, this extinction of our neighborhood as we know it will be for naught since it will do nothing to deliver “affordable housing.”

Rather, the proposal will operate as a boon for developers, who will exploit it for profit from market rate and luxury housing. But NYC does not need more market rate housing. NYC has lost 800,000 residents in the past six years and its population stands at less than 8 million for the first time in thirty years. Moreover, the “buildout” capacity under the current zoning regulations would accommodate an additional 8 to 12 million residents without any change to the law. Indeed, construction of multi-unit dwellings is ongoing in our neighborhood as well as the adjoining neighborhood of Rego Park, and citywide 150,000 new units were approved in the first six months of 2024.

Further, the proposal would rob us of the power to control future development projects by transferring authority from our local Community Board and City Council Member to the City Planning Commission, a centralized agency with no knowledge of or connection to our neighborhood, and no accountability to us. There is nothing more undemocratic than an indifferent faceless bureaucracy ramming its life-changing prerogatives down the throats of people who are unable to object.

Finally, the City of Yes for Housing Opportunity proposal was devised by a Mayor who presently is under indictment for allegedly engaging in pay-to-play schemes with foreign agents. I understand that Council Member Holden has asked the USAO SDNY as well as the NYC DOI to investigate whether any such criminality may have occurred with respect to this proposal. Until any such investigations are completed, the City Council should reject this proposal as the most prudent course of action.

In sum, the City Council should vote unanimously against this radical and unwarranted proposal which is suspect in origin and which their constituencies overwhelmingly oppose. We say no to the destruction of our neighborhoods purportedly to create affordable housing, which this proposal will not deliver. NYC must find other means to achieve affordable housing without asking us to sacrifice our single-family homes and low-density neighborhoods. We are tired of our elected officials ignoring our wishes in favor of their own interests and agendas. Here, our quality of life is at stake. Simply put, those Council Members who approve this proposal should expect to be voted out of office, and to fail in any effort to succeed to higher office.

Thank you for your consideration.

Very truly yours,

A handwritten signature in black ink, appearing to read 'Elisa', followed by a long horizontal flourish line.

Elisa S. Koenderman



Subcommittee on Zoning and Franchises Committee Hearing Testimony
Public hearing on proposed text amendment, City of Yes for Housing Opportunity

October 22, 2024

Good afternoon, and thank you to Chair Riley and the members of the Committee for convening this hearing. My name is Elizabeth Adams and I am the Interim Co-Executive Director of Transportation Alternatives (TA). TA works to reclaim our public space for better public uses that serve all of our needs – from public transit access, to green space, to affordable housing. And in a city of over 8.5 million people, it is time we do more to make it possible for people to move around, and be safely housed.

Mandatory parking requirements are arbitrary and it is time we end this outdated policy. The data is clear: More parking leads to more driving, less transit use, and less walking. And as a city with the worst traffic congestion in the entire world, it is clear the status quo isn't working for any of us. We need to invest in alternative and sustainable modes of transportation so that people have more options to get around, not just sit stuck in traffic.

Parking mandates are not set by actual need or scientific analysis but instead are proven to limit affordable housing development, increase rents, and push costs onto low-income households. In fact, parking mandates increase rent by an average of \$142 a month,¹ directly interfering with the goal of helping lower- and middle-income New Yorkers stay in the city.

As the NYU Furman Center has concluded: “The largest and most difficult zoning constraint affecting the development of new housing has been the requirement of building on-site parking spaces”²

And the need just doesn't match up. New York is the only City where more than half of households do not own a car, and has the highest use of public transportation, yet we are requiring a rigid and fixed minimum number of parking spaces – adding costs for residents who may not even have a car and don't necessitate parking at all.

¹ Transportation Alternatives, <https://transalt.org/blog/lets-house-people-not-cars>

² Furman Center Report, 2012, Searching for the Right Spot: Minimum Parking Requirements and Housing Affordability in New York City, <https://furmancenter.org/research/publication/searching-for-the-right-spot-minimum-parking-requirements-and-housing-affor>

This mandate moves us backwards when we need to be looking ahead to our climate future. Parking lots worsen the urban heat island effect, and extreme heat is the number one climate killer in our city, claiming 300 people's lives each year.

Instead of this outdated, constrained policy, we should focus on creating more diverse public space options for all of us – with parks & greenery, bus lanes & housing. New Yorkers deserve a range of options — not a city focused on forcing people to have only one way to get around.

From: [Betsy Andrews](#)
To: [Land Use Testimony](#)
Cc: [Joseph, Rita](#); [Piquant, Juvanie](#); [Speaker Adams](#)
Subject: [EXTERNAL] Testimony For Zoning For Housing Opportunity
Date: Thursday, October 24, 2024 11:03:36 PM

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My family and I oppose the City of Yes for Housing Opportunity text amendment. We live in Flatbush Prospect Lefferts Gardens where many blocks are not yet landmarked. Our block enjoys community and connections with its neighbors, some of whom have been residing here for over 40 years. There is a strong commitment to the community from long-time and recent home owners and apartment residents. There is great value in a neighborhood where people aren't forced to leave and can live where they appreciate their neighborhood.

We oppose the Zoning for Housing Opportunity amendments and request that your council members vote "No." These amendments are not ideal. As you are aware, there is not a need for further upzoning to create housing or affordable housing; in fact, there is a need for "right zoning" to preserve the stability of our residential community, historic architecture and small business and ensure that population density does not overwhelm infrastructure, including sewers, public schools, parking, sidewalks, subways and sanitation.

Please support community based planning to allow local community boards and council members to determine where and whether zoning or parking waivers are appropriate in exchange for affordable housing or other community benefits and mitigation of environmental effects. Adding density or reducing parking is appropriate in different places in different communities. Most of District 9 is covered by R6 and R7 zoning that would receive massive density increases, leading to the demolition of most of our neighborhood, with current tenants having to leave and wait years before competing with the rest of the city in a lottery for new apartments.

Support non zoning affordable housing strategies, especially affordable housing preservation. According to the city planning equitable development data explorer, 2/3 of Community District 9 dwelling units are in rent stabilized buildings. In addition, over 25,000 units of buildable housing remain possible under the current zoning.

Thank you for your attention.

Your constituent,

Elizabeth Andrews



Brooklyn, NY 11226

From: [Elizabeth Ashby](#)
To: [Land Use Testimony](#)
Subject: [EXTERNAL] CITY OF YES - HOUSING OPPORTUNITY
Date: Friday, October 25, 2024 12:07:09 PM

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Dear Council Members,

Although I strongly support the objectives of this proposal, I find it sufficiently flawed to ask that you reject it in its entirety.

It will produce little, if any, affordable housing; it doesn't protect the existing rent regulated and affordable housing; it will severely damage the character, scale, and livability of neighborhoods; and it ignores the destructive consequences of its provisions – among other things.

Best regards,

Elizabeth Ashby

Oct. 21, 2024

To whom it may concern,

My name is Elizabeth Cigrix.
I am a retired NYC. Schoolteacher.
a 31 yr homeowner and a native
Staten Islander.

I am strongly opposed to
the proposition of multi-unit dwellings and
apartment buildings. The Greenbelt
has long been protected land for
the very purpose of ~~not~~ overdeveloping
this borough. We are known as
the borough of Parks, The "Green
borough" and there should be no
opposition to leaving open green spaces
for our children to run & play.
We need all the trees and greenery
that we have to continue to help
combat the air pollution S.I. has
been forced to deal with for the
last 60 years. Cutting more trees and
porkland down should not be an option.

Our infrastructure can not support
more traffic. Our hospitals are ill-
equipped to meet the health needs
of our island already. Schools do not
have the seats or the personnel to meet the
needs of larger communities.

Building apartment buildings and
multifamily dwelling here would just
add more problems that Staten
Island can not handle.

Elizabeth Cigim



NY 10381

[EXTERNAL] City of Yes

Elizabeth DeMayo



Fri 10/25/2024 3:15 PM

To: Land Use Testimony <landusetestimony@council.nyc.gov>;

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I'm writing to oppose the "City of Yes". I'm a resident of north Manhattan. If I thought this legislation would really help our housing situation, I would have to support it, even if it inconvenienced me. But I don't see any advantage to most of the proposals.

In my neighborhood, which was rezoned relatively recently, lots of new housing is being created. Little is affordable. At the same time, numerous laws are currently totally ignored; so our quality of life is going steadily downward. If the city is totally unable to enforce traffic laws, limits on decibel levels when bars and apartments share space, or laws on how space is used, why would you consider allowing things like more manufacturing and businesses in residential areas? Why this emphasis on cramming in more people, while reducing quality of life so much that many people - of many ethnicities - just want to get out?

Presumably, Council members live in NYC - can you honestly think City of Yes changes will help anyone? The richest will be insulated from any resulting problems; everyone else will have to cope, without any recourse from the city.

Thanks for your attention,

Elizabeth DeMayo

From: [Elizabeth Fitzpatrick](#)
To: [Land Use Testimony](#)
Subject: [EXTERNAL] I support the City of Yes proposal
Date: Wednesday, October 23, 2024 9:25:15 AM

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To whom it may concern:

I wholeheartedly support the City of Yes housing development proposal. I think NYC needs more housing in order to grow. I do hope, however, for better public transportation and infrastructure, as well as more cops on the beat. We should have congestion pricing to help our essential transit and make housing developments like the City of Yes more successful.

Sincerely,
Elizabeth Fitzpatrick

From: [Elizabeth McLaine](#)
To: [Land Use Testimony](#)
Subject: [EXTERNAL] City of yes
Date: Friday, October 25, 2024 11:00:38 AM

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To whom it may concern:

The City of Yes plan is a poor fit for our community. This proposal will put additional burden on already overwhelmed infrastructure in flood prone areas, place stress on already overcrowded and many underperforming schools. In most situations increased population and density will jeopardize public safety. Our police department in, fire department, EMS, health and human services cannot withstand additional work loads. This aggressive plan will remove parking mandates for new development projects. Our car- centric, low density R 1 - R 5 neighborhoods are already parking deprived. A housing crisis is the alleged reason for this over reaching plan. However, allowance of tens of thousands of new entrants to our city while there is a crisis is akin to strategically placing additional holes in a sinking ship. New York City cannot maintain their sidewalks Over 9,000 sidewalks damaged by tree roots await repair. The repair wait list exceeds 5 years. New York City please fix what you have before adding more. Go back to the drawing board and do a district by district assessment. Determine which fingers properly fit the gloves and bring a modified product back to the respective council members and their constituents for approval. Force feeding creates a gag reflex. This plan in its current state is not digestible for many New Yorkers. Thank you in advance for your anticipated cooperation.

Ryan Elizabeth Lucas



Bronx, NY 10465

From: [Elizabeth Morrissey](#)
To: [Land Use Testimony](#)
Subject: [EXTERNAL] City of Yes
Date: Thursday, October 24, 2024 2:04:34 PM

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Good afternoon to whom it may concern, I am Elizabeth Morrissey part of the board of Madsion Marine Park Homecrest civic association. I am strongly against City of Yes. I thought from the start after going to numerous meetings that one size all plan for all communities was a horrible idea and the way it was presented to our communities' and civics. It was done in a rush manner and an attitude this is the plan, and it will happen. We need to just accept it. Well after what has come to light over the last few weeks regarding the Mayor Adams and his administration, we understand why, corruption and developers. I feel with continuing this plan it is a slap in all New Yorkers faces. This is not only a one size fits all plan but a blank check for developers to make millions and millions on developments.

The city needs affordable housing not more buildings. In all of the meetings and presentations not once was the percentage of affordable housing addressed. I am a retired Lieutenant from the NYPD, I worked in East Flatbush, East New York and Bed Stuy. All areas that were generified. All I saw was mom and pop people getting priced out after all the so-called affordable development was completed. This plan is a scam and if voted in by the City Council you are backing corruption, and it will not be forgotten.

The City of New York is the number one worse landlord, how about instead of a little more housing in every neighborhood, how about a little more work and maintenance of the residential buildings owned by the city? How many apartments are not livable???

Thank you for your consideration, Elizabeth Morrissey

October 22, 2024

To Chairman Riley and members of the City Council:

The City of Yes program to address housing shortages is supposed to be consistent and fairly applied across New York City. Although there are many qualms about whether it is well planned for the continuing vibrancy and special feeling of each of the city's neighborhoods and also deep anxiety that it will primarily benefit real estate developers, it is obviously based in the urgency for equitable housing of people living in New York City.

But I am writing to specifically protest one part of the plan. The plan has encouraged hope about the city's utilizing abandoned commercial spaces to create housing that does NOT disrupt neighborhoods. But according to the plan that's on the table, long-time residents in one neighborhood are to be punished precisely for having succeeded at doing this, and starting with doing this a good 70 years ago.

The City of Yes plan specifically targets for punishment the small group of residents of SoHo who were licensed to convert abandoned manufacturing spaces in lower Manhattan into permitted Joint Living-Work Quarters for Artists.

This is unfair because, under the City of Yes, conversions all over the city are being encouraged with NO PUNITIVE TAXING. I am writing to plead with you to eliminate the forced payment of the "Arts Fund" fee which is to be imposed on homeowners in my neighborhood--**and only in my neighborhood in all of NYC.**

I have lived in SoHo since 1970 in a loft on Spring St. With three other artists my late husband, the painter (and certified artist) Murray Reich, purchased the building--our income was low and he could afford to be part of it only because he was then a recent recipient of a Guggenheim Fellowship. The building's businesses were at various points in the process of moving out. He designed the raw space into something useful for us, and we have lived/worked here ever since, including raising a son. Murray's studio in the loft is now where his work is stored. I myself have been engaged in the arts, working primarily with independent filmmakers and for 30 years as the film and media curator, always in New York, at the Museum of the American Indian. I am now an artist's widow. My work continues with independent and Indigenous film through my writing and other support activities. My husband's paintings and works on paper are stored in the studio, and my work is also done in the studio space.

I am nearing 80 years of age, and aging in place in SoHo. ~~It is clear that~~ the Arts Fund fee is discriminatory and unfair to us who have nurtured these old buildings as best we could (my building faces a complete roof replacement this year and this will be at huge individual cost to us). These SoHo buildings, with their creative occupants and their distinctive visual and architectural quality, are a primary attraction in the city. ~~Commerce also flourishes here as it is an attractive neighborhood.~~ This is world-famous SoHo, a world leader in the field of restoration and repurposing of historical

commercial/industrial buildings, repurposed originally by these same creators whose legacy now may be severely taxed.

And the Art Fund tax is discriminatory in its particular focus on this neighborhood. This is obvious, since the movement in the city--correctly--to promote housing has been towards permitting ~~all kinds of~~ conversions to residential use in all areas and all kinds of buildings WITH NO PENALTY TO BE PAID. In the case of our building we have spent 55 years of collective support for its upkeep, repair, and safeguarding for the present and for the future, and with respect for the past that it is witness to. For this care, ongoing cost and attention to the city's invaluable downtown neighborhood, we deserve better than to be penalized by the imposition of the Arts Fund.

So I am writing you to urge you to abolish the Arts Fund and its exorbitant fees. We have always lived here lawfully and don't deserve unfair treatment.

Thanks for your attention.

Sincerely,

Elizabeth Weatherford

[EXTERNAL] Written testimony

Elliot Ledley <

Mon 10/21/2024 6:45 PM

To: Land Use Testimony <landusetestimony@council.nyc.gov>;

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I have a car in NY and when I think about the city I want in the future, it is one where the streets are for people and we share more resources when it comes to transportation. I think that parking mandates are outdated and we need to heavily switch gears to the best public transportation.

I'm not sure if all this micro mobility stuff is here to stay but I do know that large vehicles owned by individuals is hurting our city more than it is helping it.

Not to mention that this should allow for more affordable apartments to be constructed. The 'affordable' units that are being created currently are really not what most consider affordable and the lotto system is terrible. The current ways seem to push out the middle class and we need to do something about it.

I hope we can build the city we want our kids and grandchildren to live in.

Elliot Ledley

From: [Xarpof4cr](#)
To: [Land Use Testimony](#)
Subject: [EXTERNAL] City of Yes Housing
Date: Thursday, October 24, 2024 4:47:35 PM

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No to City of Yes
Preserve City Island Special District Zoning
Emanuel Vrettos
City Island Resident
[Sent from the all new AOL app for iOS](#)

From: [emeasap2525](#)
To: [Land Use Testimony](#)
Subject: [EXTERNAL] City of Yes
Date: Friday, October 25, 2024 9:09:59 AM

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Please say "NO" to "City of Yes".
Thank you

Sent from my Galaxy

[EXTERNAL] Testimony in support of lifting parking mandates

Emily Hoffman <

Fri 10/25/2024 11:01 PM

To: Land Use Testimony <landusetestimony@council.nyc.gov>;

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Hi,

I am writing to testify in support of lifting parking mandates. I have lived in Brooklyn for 14 years and am raising my child here. I believe that New York City should be a city of people, not cars. Parking mandates make it more difficult for bikers and pedestrians to safely move around the city. These are the healthiest and most environmentally friendly ways to travel and should be prioritized. Additionally, parking mandates make it more difficult to build housing in the midst of a housing crisis that calls for the building of affordable housing.

Thank you,
Emily Hoffman

[EXTERNAL] City of Yes for Housing Opportunity

Emma Berry <[REDACTED]>

Fri 10/25/2024 3:22 PM

To: Land Use Testimony <landusetestimony@council.nyc.gov>;

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As a Brooklyn resident (AD 40) I'm writing to express my support for the City of Yes housing plan and especially for getting rid of parking minimums. It's absurd to require buildings in areas of the city with ample access to public transportation to incorporate more parking when that space could be used for people to live.

All best,
Emma Berry

[REDACTED]
Brooklyn, NY 11226

From: [Emma](#)
To: [Land Use Testimony](#)
Subject: [EXTERNAL] Vote NO to "the city of yes housing opportunity"
Date: Friday, October 25, 2024 8:13:46 AM

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To Council members:

I stand with my neighbor and Vote NO. I am a single family homeowner. This plan was designed by developers to benefit developers! This plan will lead to over development throughout the city.

12 of 14 Community Boards in Queens voted No.

To council members: VOTE NO

Respectfully,
Emma Lee



October 22, 2024

Re: City of Yes public hearing - Testimony

Good Morning Chairperson and Members of the New York City Council,

My name is Daniel Arnow and I'm here on behalf of the Entertainment Community Fund and our subsidiary, Actors Fund Housing Development Corporation. We are a national human services organization that provides support, including affordable housing, for everyone in the performing arts and entertainment community. We are here today to express our strong support for the Administration's "City of Yes" housing initiative.

New York is celebrated as one of the cultural capitals of the world, and its commitment to the arts is an essential driver of the city's overall health. Artists, performers, and creatives are a major driver of economic activity for our communities, generating more than \$110 billion annually for New York City. Multiple industries rely on our museums, theatres, galleries and culture to attract talent, tourists and students. In lower-income neighborhoods, cultural resources, including artists living there, are linked with positive outcomes in education, public safety and health. However, the stark reality is that the high cost of living, especially housing, has put this invaluable community at risk.

The average monthly rent for a one-bedroom apartment in New York City has surpassed \$4,000, which is simply unattainable for most in our industry. As a result, we have witnessed an outward migration of artists from the city, with countless creatives leaving for more affordable cities, taking with them their talent, innovation, and contributions to our city's unique cultural fabric.

The Administration's "City of Yes" housing initiative is an important step in addressing this affordability crisis. The "City of Yes" will help create more housing options for all New Yorkers, including our artists, by reforming outdated zoning laws, reducing barriers to new housing construction, and encouraging denser, transit-oriented developments. Additionally, the focus on mixed-use development provides an opportunity to integrate affordable housing with arts and cultural commercial uses, creating more vibrant communities.

While we strongly support this proposal, we urge the city to go even further in its commitment to ensure that cultural workers can continue to live and work here. Low-income artists are one of the city's most financially vulnerable groups and need more affordable housing targeted explicitly at arts workers. In the first month of the pandemic, arts employment dropped by 60%, and employment remains 13%

Actors Fund
Housing Development
Corporation
729 Seventh Ave.
10th Floor
New York, NY 10019
T: 212.221.7300

below pre-pandemic levels.

To ensure that New York remains the global arts hub, we need housing policies that reflect the unique needs of our creative communities. This includes expanding affordable artist housing and ensuring that artists have access to affordable workspaces that allow them to thrive in our City. These targeted solutions would not only support individual artists but also help sustain the broader cultural and economic ecosystem of New York City.

In closing, we strongly support the "City of Yes" and urge the Council to embrace policies that make housing more accessible and affordable for all, particularly those in the arts. We look forward to working with the city to ensure that New York remains a place where creativity and culture can flourish.

Thank you for your time and giving us the opportunity to speak on this critical issue.

Sincerely,



Daniel Arnow
Executive Director
Actors Fund Housing Development Corporation



729 Seventh Avenue, 10th Floor | New York, NY 10019



New name. New look. Same mission.

Supporting a life in the arts.

entertainmentcommunity.org

EQUITABLE INFRASTRUCTURE GROUP

“Connecting the players, policies, and projects”

City of Yes for Housing Opportunity
Testimonial Letter to the New York City Council
Subcommittee on Zoning and Franchises,
Hon. Kevin C. Riley, Chair
Friday, October 25, 2024

I am L. Charlie Oliver, founder and chair of the Equitable Infrastructure Group, and I am submitting testimony in opposition to the **"City of Yes, Zoning for Housing Opportunity"** proposal in its present form. Despite its good intentions, the proposal warrants deeper scrutiny and monitoring measures to ensure that it aligns with equitable development and the infrastructure needs of all communities, particularly those historically marginalized and negatively impacted by climate change and poor/overlooked infrastructure.

1. Poor Sewer and Stormwater Infrastructure

Poor sewer and stormwater infrastructure significantly hinders New York City's **"City of Yes for Housing Opportunity"** initiative, aimed at transforming the city into a more sustainable and inclusive urban environment. When sewer systems are outdated or undersized, they become overburdened during heavy rains, leading to widespread flooding and overflow. This not only damages streets and homes, especially in vulnerable neighborhoods, but also causes sewage to mix with stormwater, polluting local rivers and affecting public health. Chronic waterlogging discourages new investment, makes streets less safe, and undermines the livability that "City of Yes" seeks to enhance. Addressing these issues through modernized infrastructure would support healthier communities, reduce costly damages, and align the city with its vision of resilient, equitable urban development.

In 2023, the U.S. Environmental Protection Agency (EPA) announced more than \$256 million in funding for New York, provided through President Biden's Bipartisan Infrastructure Law via this year's Clean Water State Revolving Fund (CWSRF). This funding will support essential upgrades to water, wastewater, and stormwater infrastructure throughout New York, helping safeguard public health and preserve valued water resources. Nearly half of this amount will be offered as grants or principal forgiveness loans, empowering underserved communities nationwide to invest in critical water infrastructure and create well-paying jobs.

In addition, additional federal funding streams, when leveraged correctly, will provide much-needed funding to modernize infrastructure and alleviate the historic burdens bore by NYC's underserved communities. Such opportunities should be presented in conjunction with the rezoning.

The mayor's own words are as follows:

“One year ago, Hurricane Ida brought the heaviest rainfall in our recorded history and flooded our streets, subways, and basements, and, worse, claimed the lives of 13 of our neighbors,” said **Mayor Adams**. “Our neighbors were victims of climate change, which is bringing longer droughts, stronger storms, and heavier rainfall to places all over the globe, but we will not simply stand by and do nothing. We are taking action to protect our city and prevent future tragedies, by ramping up flood protection with sewer advancements and curbside rain gardens, as well as by building out our cloudburst infrastructure and expanding other flood mitigation options, including the bluebelt drainage system. New York City is adapting to the realities of climate change in real-time and doing everything we can to keep New Yorkers safe and honor all that we lost one year ago today.”

Live video: <https://youtu.be/p005UBuQGUC>

Environmental Considerations

Another critical issue is the environmental implications of fast-tracking developments. The initiative lacks sufficient attention to sustainability and resilience, particularly in neighborhoods vulnerable to the impacts of climate change. There are serious concerns that reducing regulatory scrutiny in the interest of expedience could lead to projects that do not prioritize green building standards, stormwater management, or energy efficiency, further burdening communities already bearing the brunt of environmental injustice. We must ensure that new developments not only add housing but also contribute to a greener, more sustainable city.

The proposal decidedly opted for the minimum standard allowed.

The *Incremental Environmental Impact methodology* in the *City of Yes* proposal falls short by isolating changes without fully considering their cumulative environmental impacts. This approach can obscure the broader, long-term environmental consequences of new developments, leading to increased strain on local ecosystems, infrastructure, and air quality. The segmented analysis may neglect how individual projects together contribute to overburdening infrastructure, pollution, and urban heat, ultimately undermining the city's sustainability goals. A holistic environmental review is essential to safeguard the balance between development and environmental preservation, ensuring the city's growth aligns with resilient, eco-conscious practices.

The *Incremental Environmental Impact methodology* often focuses narrowly on changes or impacts directly linked to a single project phase, rather than comprehensively addressing all cumulative, long-term, or interconnected effects.

Here are some common aspects the *Incremental Environmental Impact* methodology may overlook:

1. **Cumulative Impacts:** Incremental analysis may neglect the aggregate effect of multiple projects in an area, resulting in an underestimation of overall environmental strain.
2. **Indirect or Secondary Impacts:** By emphasizing immediate impacts, this approach can miss indirect effects, such as those related to induced development or increased population in surrounding areas.
3. **Long-Term Effects:** Some environmental changes, like habitat loss or greenhouse gas accumulation, may develop over decades. Incremental methodologies may undervalue these long-term outcomes.
4. **Systemic and Network Impacts:** In urban planning, for example, incremental analysis may fail to consider how a single project affects broader systems like transportation, housing, or ecological corridors.
5. **Social and Health Implications:** While environmental aspects are covered, social aspects such as health risks and equity might not receive sufficient consideration, particularly those that arise from subtle, long-term environmental changes.

A more holistic approach better captures these issues, especially in projects with significant environmental or social impact potential, like the "City of Yes" proposal.

Additional *Incremental Environmental Impact* Cons:

1. **Potential for Overlooked Cumulative Impacts:** A segmented approach may overlook cumulative or "big picture" impacts, especially if each increment's impacts seem minor but collectively contribute to significant environmental stress.
2. **Higher Long-Term Costs:** Conducting multiple smaller assessments over time can be more costly than a single, comprehensive study.
3. **Inconsistent Standards:** As assessments occur over time, standards or regulatory requirements may change, leading to inconsistencies in methodology or mitigation practices.
4. **Increased Complexity for Management:** Project managers and regulators may face challenges coordinating various phases, especially when multiple agencies are involved or when environmental factors overlap between project phases.
5. **Uncertainty for Long-Term Planning:** While IEI provides flexibility, it can introduce uncertainty about long-term environmental outcomes, which may affect community support and investment confidence.

Friday, October 25, 2024

Finally, the rapid development encouraged by the "City of Yes" could strain our city's already overburdened infrastructure. From transportation networks to schools, hospitals, and other public services, many areas are already struggling to keep pace with demand. Without a clear and comprehensive plan for infrastructure improvements that match the scale of the proposed developments, this initiative could worsen traffic congestion, overcrowding in schools, and strain on essential services, leading to a decline in the quality of life for all residents.

2. Economic Impact & Gentrification

The "City of Yes" initiative, while aiming to streamline rezoning and development, will serve to exacerbate the existing inequities in our city. This initiative's blanket approach to upzoning and loosening restrictions will accelerate gentrification, especially in low-income and working-class neighborhoods. By encouraging the construction of market-rate housing without adequate safeguards, the initiative will displace long-time residents and local businesses who are already struggling with rising rents and taxes. While the goal of increasing housing supply is critical, without strong provisions for deeply affordable housing, the "City of Yes" will disproportionately benefit developers and wealthier residents at the expense of those who most need stable, affordable homes.

While many comparable zoning initiatives to that of other cities were cited during the City of Yes presentation, the testimonies cherry-picked data – often omitting key findings to the contrary. Moreover, all initiatives as-is within the City of Yes will exponentially apply pressure on existing homeowners to ultimately sell.

3. Deep Affordability

The "City of Yes" proposal, while focused on increasing housing options and simplifying zoning regulations, lacks provisions directly supporting deep affordability, which is essential for lower-income communities. The plan promotes mixed-use and transit-oriented developments, encouraging more market-rate units but without dedicated measures to ensure a significant portion of units are deeply affordable.

One concerning provision is the plan's emphasis on "as-of-right" development flexibility, which simplifies the permitting process for developers but often benefits those focused on higher-rent properties, as these developments are generally more profitable. Moreover, while incentives exist for "affordable housing," they tend to favor moderate-income brackets, leaving low-income households underserved.

Friday, October 25, 2024

Incentives to encourage affordable housing through density bonuses, though present, lack clear mandates for deep affordability thresholds, risking a surge in units that technically qualify as affordable but remain unattainable for those most in need. The lack of specific regulatory mechanisms to mandate units for extremely low-income earners risks undermining the deep affordability goals necessary to address New York City's housing crisis adequately.

4. Community Involvement

The proposal's top-down approach undermines the need for genuine community engagement. Zoning laws and development decisions should be made with the direct input of the communities they impact, ensuring that local voices are not drowned out by powerful developers. While the "City of Yes" promotes growth, it risks reducing the opportunities for community boards and residents to meaningfully weigh in on the character and future of their neighborhoods. Rapid, unchecked development without a nuanced understanding of local contexts can erode the social fabric of diverse communities and continue the Robert Moses-inspired directive of stifling community cohesion.

About Equitable Infrastructure Group

The Equitable Infrastructure Group|Partners (EIG|P) is a private organization promoting fair and resilient infrastructure for the public good. Our main goal is to foster meaningful discussions and take action to ensure the delivery of infrastructure that is both equitable and resilient. Our group utilizes more than a decade of research. This research allows us to closely monitor the key players, projects, and policies within infrastructure development zones, forming the bedrock of our initiatives. Through our efforts, we have contributed to creating national strategies, influencing the trajectory of over \$870 billion in infrastructure investments. Today, EIG|P is deemed the number one source of advancing equity in infrastructure and an indispensable depository of information.

Conclusion

In conclusion, while the "City of Yes" initiative is undoubtedly well-meaning in its goal to spur growth and address housing shortages commendable, it does so in a way that will neglect the long-term needs of the most vulnerable populations. I strongly urge the council to reconsider this proposal and ensure that any future development policies center on equity, sustainability, and well-organized and timed community engagement. Rather than pushing for speed, let us prioritize thoughtful, inclusive development that benefits all New Yorkers, not just a privileged few.

Zoning reform is not key, effective zoning reform with safeguards is key. Perhaps the best remedy is to send back with modifications, and in the interim free up the housing inventory currently being warehoused while moving office-to-residential conversions to the forefront.

Thank you for your time and consideration. If you would require us to clarify our testimony or answer any questions, do not hesitate to contact me directly at [REDACTED].

From: [Erin McFadden](#)
To: [Land Use Testimony](#)
Subject: [EXTERNAL] City of Yes for Housing Opportunity
Date: Thursday, October 24, 2024 3:08:11 PM

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To NYC Council:

I want to voice my adamant support for **ending parking mandates citywide**. In the most transit-rich city in North America, where fewer than half of households own cars, such mandates are inefficient at best and wastefully counterproductive at worst. We need housing for humans, not cars, and they shouldn't be a package deal when we're facing such a serious shortage of vacant apartments. My fellow New Yorkers are with me on this - 75% of us support the end of parking mandates. Don't let us down.

Thanks for your time and consideration.

Love and rage,
Erin McFadden
she/her
CD 35/CB8 resident
[Rutgers](#) 2015, [LSE](#) MSc Int'l Political Economy 2019

Adrienne E. Adams, Speaker
New York City Council
City Hall
New York, NY 10007

October 25, 2024

Re: Testimony in Opposition to City of Yes for Housing Opportunity

Dear Speaker Adams and City Council Members,

I strongly urge you to vote no on Mayor Adams' City of Yes Housing proposals which are neither equitable nor reasonable for the future of our city and its communities.

This "one size fits all" plan is an undemocratic and counterproductive scheme designed by developers for developers, and being promoted by a mayor who is currently indicted for bribery, fraud, and accepting foreign campaign funds. These proposals prioritize the interests of big real estate, reward and incentivize corruption, while undermining the well-being of New Yorkers and the future of our beloved neighborhoods and city.

Despite the misleading promises of "affordable housing" and "opportunity zones," the reality is that the City of Yes prioritizes density over true affordability. This plan is not about creating homes for working-class New Yorkers; it is about creating profits for developers, builders, and speculators. Rather than addressing the housing crisis, the plan will lead to overdevelopment, displacement, and gentrification, replacing owner-occupied housing with market-rate and luxury rental units. This ensures that long-term residents will be pushed out of their own communities while large developers capitalize on unchecked growth.

City of Yes also fails to address the pressing concerns of our overburdened infrastructure. The proposal would promote dense development without providing the necessary upgrades to aging systems like drainage, sewers, and electrical grids. The loss of scarce green spaces would further exacerbate environmental risks, including increased flooding, while compromising the quality of life for residents. In a time when we need to harden our city against the climate crisis, City of Yes would only worsen these vulnerabilities. NYC cannot afford to engage in magical thinking or succumb to absurd gaslighting that pretends eliminating parking mandates, legalizing death traps & putting grandma in the garage, is going to improve conditions.

It's important to note that nothing currently prevents the construction of affordable housing under existing rules. In my own neighborhood of Rego Park, new rental buildings with affordable units have recently been built and more are currently under construction. Meanwhile, there are some properties that remain underutilized and/or vacant due to flawed tenant laws that deter both landlords from renting & potential buyers from purchasing tenant occupied properties. This shows that the City of Yes is not the solution to affordability, but rather a cover & accelerant for reckless development.

Furthermore, according to official statistics, New York City has lost about 800,000 residents in recent years, returning to roughly the same population size as in 1960. However, we now have 800,000 more residential units than we did then. In fact, 150,000 new units were approved in the first half of 2024 alone. Current zoning actually accommodates 16 to 20 million more people without any need for drastic changes. These numbers, along with the evidence I see & hear with my own eyes & ears, prove that current zoning is not the problem. The claim that sweeping zoning changes are necessary for affordability is not supported by the data, nor my lived experience.

Worst of all, passing this pay-to-play scheme would eliminate the relevance of City Council, diminish local input, and undermine the will of the people. City of Yes threatens to further erode public trust in government and create more resentment and unrest, as it silences the very communities it claims to help.

For the sake of our city, our neighborhoods, and our democracy, I respectfully implore you to please **VOTE NO** on this deeply flawed proposal.

Thank you for your attention and consideration in this vital matter.

Sincerely,

A handwritten signature in black ink, appearing to read "Esther Gimelfarb", written in a cursive style.

Esther Gimelfarb

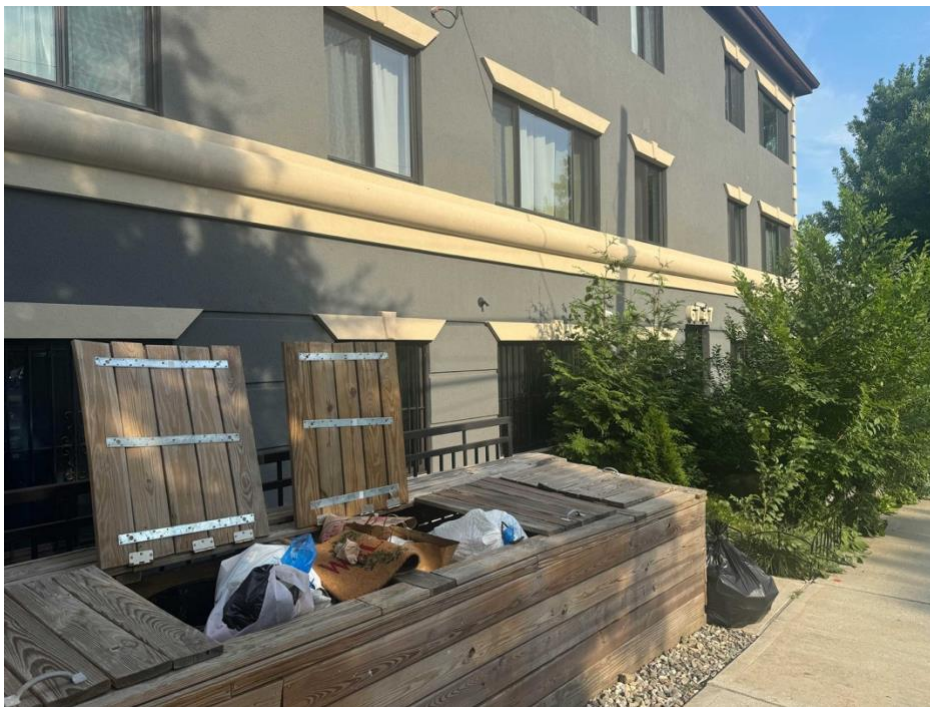
■■■■ ■■■■ ■■■■

Rego Park, NY 11374

Supporting Material/Sources:

- New 3 story rental building (67-47 Alderton St. Rego Park, Queens) on my block, has 18 units. It's available on NYC Housing Connect, contains 6 units for residents at 130 percent of the area median income (AMI), ranging in eligible income from \$68,572 to \$139,620. Demographics of occupants appear to be a diversity of young working-class people. However, in addition to unsightly & unsanitary conditions (pictured below), which have not been addressed –despite numerous complaints to the 311 and the Sanitation Dept, many occupants of this building, as well as many Rego Park residents in general, have dogs. Yet, there is no dog park within walking distance.

<https://newyorkyimby.com/2022/01/housing-lottery-launches-for-67-47-alderton-street-in-rego-park-queens.html>



- 8 story affordable housing building, currently under construction (68-19 Woodhaven Blvd. & 68th Rd. in Rego Park, Queens) –Replaced Florist Hills & Power Auto Body (convenient, local small businesses).

<https://newyorkyimby.com/2020/11/eight-story-affordable-housing-development-revealed-for-68-19-woodhaven-boulevard-in-rego-park-queens.html#>

- KSK Construction & Mayor Eric Adams

<https://nypost.com/2023/11/11/metro/construction-biz-in-adams-fbi-probe-has-shoddy-safety-record/>

From: [Genie S](#)
To: [Land Use Testimony](#)
Subject: [EXTERNAL] City of Yes
Date: Wednesday, October 23, 2024 4:11:53 PM

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Good Afternoon,

Thank you for taking the time to read my written testimony. I understand the need for affordable housing. I myself had to get an additional job just to be able to pay my rent for the small 1 bedroom apartment that I was renting a few years ago. I was working approximately 50 hours a week just to cover my rent. I rented in a very dense neighborhood where there was no parking, and garbage was everywhere. I would have to park many blocks away and walk to my apartment which wasn't safe to do at night. Taking the bus wasn't an option since my job was nowhere near any public transportation. I was finally fed up and decided it was time to purchase a house. I was single and there was no way I could afford a house so I got a 3rd job. Besides working 3 jobs, I was also going to school for my second degree. After many years of saving my money and working too many hours (sometimes 80 hours in a week) I finally had enough for a down payment. I moved to Bayside, Queens which is a less dense neighborhood and that is the reason I wanted to move there. It was safe, no garbage on the street, plenty of parking and tons of trees. If the City of Yes passes, greedy developers will ruin the neighborhood. It will become congested and it will turn into the neighborhood I left. I worked too hard to be able to move to a less dense area. Also the buildings that will be built won't have enough affordable housing. The majority will be market rate apartments so it will not be helping many people. Developers only want to make a profit. If you asked them to make a building 80% affordable, they will not want to build. They don't want to help out anyone but themselves. I am begging you to vote NO for the City of Yes. Thank you very much.
Eugenia Sanakis

From: [Evan Doran](#)
To: [Land Use Testimony](#)
Subject: [EXTERNAL] Public Hearing: City of Yes
Date: Tuesday, October 22, 2024 8:56:48 PM

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I urge the city Council to adopt City of Yes and lift parking requirements, the city needs transit not more cars that pollute our air and kill pedestrians. Also Vickie Paladino is a disgrace and her poor behavior at public hearings reflects poorly on the entire City Council body at a time when it should be a bastion of leadership given the Mayor's debacle.

Thank you,

Evan Doran

From: [Evon](#)
To: [Land Use Testimony](#)
Subject: [EXTERNAL] Parking Mandates
Date: Thursday, October 24, 2024 9:13:39 PM

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Please lift the parking mandate, it is just that a mandate to include parking not a ban on including parking. Lets let the free market decide.

Thanks,

Evon Magnusson

From: [Mr. Wander](#)
To: [Land Use Testimony](#)
Subject: [EXTERNAL] Re: City of Yes Housing No to City of Yes
Date: Wednesday, October 23, 2024 7:21:42 AM

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe. Report suspected phishing emails with the Phish Alert Button or forward them to phish@oti.nyc.gov as an attachment.

To Whom it May Concern: The City of Yes plan, a 1 glove fits all agenda, is a poor fit for our community. This proposal will put additional burden on already overwhelmed infrastructure in flood prone areas. Place stress on already overcrowded and many underperforming schools. In most situations increased population and density will jeopardize public safety. Our police force, fire department, EMS, health and human services cannot withstand additional work loads. This aggressive plan will remove parking mandates for new development projects. Our car-centric, low density R 1 - R 5 neighborhoods are already parking deprived. A housing crisis is the alleged reason for this over reaching plan. However, allowance of tens of thousands of new entrants to our city while there is a crisis is akin to strategically placing additional holes in a sinking ship. New York City cannot maintain their sidewalks Over 9,000 sidewalks damaged by tree roots await repair. The repair wait list exceeds 5 years. New York City please fix what you have before adding more. Go back to the drawing board and do a district by district assessment. Determine which fingers properly fit the gloves and bring a modified product back to the respective council members and their constituents for approval. Force feeding creates a gag reflex. This plan in its current state is not digestible for many New Yorkers. Thank you in advance for your anticipated cooperation.

Fabian Wander
[REDACTED]
Bronx NY 10465

On Tue, Oct 22, 2024 at 5:01 PM Mr. Wander [REDACTED] wrote:

No to the city of Yes. I want my community to stay as one and two family homes. That is why I'm raising my family here and not moving to the suburbs. I strongly oppose the City of Yes for Housing and Zoning changes.

Fabian Wander
Bronx resident
District 13

Last Chance -SAY NO TO CITY OF YES HOUSING SAVE ZONING IN DISTRICT 13.
Please take two minutes to do so . Believe it counts and matters . We have been heard from the last time we all wrote . Let's get hundreds of emails sent. This is the last request and

most important . Please do so by October 24th. Email testimony for any land use to landusetestimony@council.nyc.gov Subject: City of Yes Housing No to City of Yes . SAVE OUR INDIVIDUAL ZONING BY COMMUNITY. Keep the American single family home dream alive. Sign your name Resident of Bronx, District 13 That's all you have to write and hit send on your email .



Testimony of the Family Homelessness Coalition

The New York City Council Subcommittee on Zoning and Franchises Oversight – City of Yes for Housing Opportunity Proposal

October 22, 2024

The Family Homelessness Coalition (FHC) is made up of organizations representing service and housing providers, children’s advocacy organizations and people with lived experience with family homelessness. We are united by the goal of preventing family homelessness, improving the well-being of children and families in shelter, and supporting the long-term stability of families with children who leave shelter.

We would like to thank Chair Riley and members of this Committee for the opportunity to submit testimony on this hearing regarding the City of Yes for Housing Opportunity zoning text amendments and related housing supports.

Introduction

FHC does not take a Coalition perspective on the zoning proposals contemplated under City of Yes for Housing Opportunity. However, we would like to submit the following testimony which includes our recommendations for those budgetary priorities and operational reforms that the Council leadership has called to be included in a full housing package alongside the zoning proposals.

Full Implementation of the CityFHEPS Reform Package

FHC was active in advocating for the suite of CityFHEPS reforms and expansion, including Int. 878-A, Int. 893-A, Int. 894-A and Int. 229-A. That expansion has been held up by legal challenges and a resistance to implementation, denying expanded CityFHEPS to many homeless families with children. We continue in our call for those legislative items to be implemented and funded.

More Support for Prevention and Aftercare Services

As development increases as a result of newfound flexibility under City of Yes, efforts should be made to mitigate any unintended consequences by better resourcing both eviction prevention and

aftercare services for those placed in permanent housing. Tangible ways that can be achieved include:

- **Increase the Budget for Homebase by \$37.9mm to a Total of \$100mm.** Since the pandemic, Homebase providers have taken on tremendous increases in caseload as well as an ever-expanding set of responsibilities. This has not been accompanied by funding levels to match the new post-Covid reality. As a result, wait times have increased for critical Homebase services like help with eviction prevention, emergency rental assistance and obtaining benefits.
- **Establish a Dedicated Funding Stream Strictly for Aftercare Services.** Families who are placed in permanent housing from shelter require support in their period of transition to avoid recidivism into homelessness. Establishing a separate funding stream strictly for this essential work will ensure organizations can properly dedicate staff and tailor programs which will increase stability.
- **Release an RFP and Dedicate Funding for Organizations Beyond Homebase Providers to Process CityFHEPS.** Legal services organizations who have taken on this role on a temporary basis have been successful in speeding processing times and reducing overall burden on the system. Opening this opportunity further will reduce strain on Homebase providers and expedite processing.

Reduce Barriers in Voucher Administration

A number of recent streamlining measures and reforms have been implemented in homeless placements, voucher administration, and NYC Housing Connect lease-up. However, further steps are needed to greatly expedite placement and meaningfully reduce family homelessness. This is particularly important if greater supply is unlocked to ensure people with the greatest need have equitable access to those apartments. Reforms include:

- **On Inspections:**
 - Non-Life Threatening Failure Reform: DHS should adopt NYCHA's approach to inspections that prioritize significant health and safety issues but allow for smaller issues to be rectified after tenant move-in.
 - Reform Double Inspection Rule: For units which require a DHS inspection (cellars and ground floor units), DSS requires both a DHS and a separate HRA inspection. We call for the secondary inspection to be limited to a fraction of the units as a secondary review/audit procedure but not policy for every unit.
- **On Income Verification:**
 - The \$100 Rule: The incomes presented in a voucher package must be within \$100 of the original shopping letter amount. With low-income tenant incomes often

varying greatly week by week, this discrepancy often triggers a rebudgeting letter, which is a source of delay. If the income qualifies at the time of the voucher package, it should be approved without rebudgeting.

➤ **On Public Assistance Single Issuance:**

- Time Frame: The current time frame is 30 days but often the process for applying and getting the voucher is longer and requires the single issuance to be resubmitted. We recommend a 90 day time frame.

Agency Funding

We call upon increased funding for those agencies that will be most directly impacted by an increase in development activity associated with City of Yes for Housing Opportunity. This includes HPD, DHS and HRA. More staff power will be needed at those agencies to ensure an efficiently moving pipeline of affordable housing and expedient processing of rental assistance and other important benefits.

Thank you for your consideration and for the opportunity to submit this testimony.

New York City of Yes Testimony for Zoning Housing Opportunity
October 23, 2024

My name is Felice Robertson resident of Crown Heights since 1970. My husband Hector is President of Washington Avenue Botanic Block Association called WABBA, I am a community member of Community Board 9. We speak for us and our community of WABBA. We are not against building Low Income housing; however, we oppose the City of YES proposal because these plans will create less restrictive zoning that would allow for small and shared living. Landlords are subdividing apartments and renting out room so they can get \$6,000 thousand dollars for an apartment from a rent stabilized building.

This would also allow for more development everywhere in my neighborhood with No parking and No infrastructure. Additionally, this plan will allow developers to charge high prices and charge whatever they want for their units. At a time when this City, especially this historic Crown Heights that's not landmarked even though the buildings are historic and already overpopulated with density on our blocks. This community/neighborhood is experiencing a boom in development, and many of those develop units are market rate buildings. At least these apartments should be rent stabilized (succession rights) building that would help senior's and families that grew up, in their apartments. This proposal will not allow for households with an AMI of \$55 thousand dollars a year, to live in any of these new buildings.

As I stated before, I was raised and live in Crown Heights, on Washington Avenue and right around the corner of a newly constructed building, 111 Montgomery Street with 164 condominium units with 12 floors. At the end corner on

Montgomery Street and Franklin Ave, North side of 49 Crown Street has 321 units with 33 floors wrapped around a L shape that connect to the south side of 54 Crown Street with 591 units and 17 floors. To add, 1 Sullivan is 12 stories with 52 market rate units built on top of 1035 Washington Avenue, a prewar 6th stories building that had their side windows, back windows sealed, and fire escape removed (safety issue) to build this market rate building. These buildings did not provide parking for their residents, resulting in fighting over parking spaces. We do not want any zoning that would allow landlords to add floors on top of rent stabilized buildings, especially prewar buildings.

This story has not ended, with 960 Franklin Avenue building getting ready to build. This community has surpassed the density for a quality of life. No one thought or care to build more schools, hospitals, having available parking and even food for this overpopulated same block radius of approximately 6 thousand and more people are being added to an already density community and blocks.

Finally, it is clear this program is designed to push out minorities and low-income families out of the neighborhoods and ultimately, out of New York City. The City of Yes should be the City of **NO**.

If the intent is to develop housing for New Yorkers and this plan moves forward, NYC City Council members should guarantee that they would personally implement safeguards to ensure developers will not gouge New Yorkers seeking dignified Low-Income Housing. **Density is harmful and will affect generations to come.**

Thank you, Hector and Felice Robertson



The Fiske Terrace Association
Established in 1907
fisketerraceassociation@gmail.com

Geraldine Cols
President

Charlene Forest
Secretary

Meryl Glovin
Treasurer

October 13, 2024

Hon. Farah N. Louis
Member, New York City Council
1434 Flatbush Avenue
Brooklyn NY 11210
Dear Councilmember Louis,

The Fiske Terrace Association, established in 1907, recognizes the need for more affordable housing in New York City, particularly in proximity to public transportation. However, would like to go on record in opposition to the City of Yes planned zoning changes affecting our neighborhood and all the neighborhoods comprising Victorian Flatbush. Specifically, the permitting as-of-right development of Accessory Dwelling Units or Multiple Dwelling Units without any analysis or neighborhood plan could easily turn Victorian Flatbush into a hodge-podge of incompatible structures and destroy the fabric of our area that our and other neighborhood associations have fought long and hard to preserve.

We support the zoning changes that will increase density on commercial streets such as Foster Avenue, Cortelyou Road, Coney Island Avenue and Church Avenue, especially near the Brighton Line stations, which are also served by various local and express buses. These locations would afford new residents of our area better transit access than they would get within the residential streets, and provide better access to services, shopping and public green spaces in Prospect Park, Parade Grounds, etc. Our residential areas do not have any public green space, and parking by current residents, commuters and Brooklyn College students and staff already strain the limited street parking in our community.

The neighborhoods of Victorian Flatbush were fully planned developments of their time. The proposed as-of-right zoning changes for our residential neighborhoods reflect a lack of planning, and we ask that these zoning changes be rejected.

Sincerely,

Geraldine Cols Azocar

Geraldine Cols Azocar, President, Fiske Terrace Association

NEW YORK CITY COUNCIL
SUBCOMMITTEE ON ZONING & FRANCHISIES
October 22, 2024
TESTIMONY

JAMES METTHAM
PRESIDENT
FLATIRON NOMAD PARTNERSHIP

Good morning/afternoon, Chair Riley, and members of the NYC Council of Subcommittee on Zoning & Franchises. My name is James Mettham and as President of the Flatiron NoMad Partnership Business Improvement District (BID), I am pleased to offer my testimony in support of the "City of Yes for Housing Opportunity" initiative.

The Flatiron NoMad Partnership represents a dynamic business community and burgeoning mixed-use neighborhood in the heart of Midtown South, Manhattan. Our district is renowned for its diverse mix of businesses, hospitality, cultural institutions, and residential living that emblematic of a 'New' New York. We believe that the "City of Yes for Housing Opportunity" initiative, in conjunction with the Midtown South Mixed-Use Plan (MSMX), will enhance the livability, economic vitality, and overall quality of life in our neighborhood.

Key benefits of these initiatives include:

- **Increased Housing & Affordability:** The "City of Yes for Housing Opportunity" aligns with our goal of creating a more mixed-use, inclusive, dynamic, and equitable district. By promoting high-quality affordable housing development, we can ensure that a range of residents and working families can live, work, shop in, and enjoy our district and city.
- **Office-Resi Conversions:** Outdated rules hinder the conversion of vacant offices and other non-residential space into housing. "City of Yes for Housing Opportunity" will streamline this process, creating more homes, increasing property values, and revitalizing neighborhoods affected by the pandemic.
- **Enhanced Economic Activity:** A thriving residential base is essential for a vibrant business district. By encouraging a mix of uses, the comprehensive "City of Yes" package and MSMX will create a more dynamic environment that attracts visitors, residents, and businesses alike. This will lead to increased foot traffic, retail sales, and job creation.
- **Blending Preservation & Housing Needs:** "City of Yes for Housing Opportunity" will streamline the process for landmark buildings to sell their development rights which will cultivate quintessential districts where landmarks can unlock revenue for critical maintenance while welcoming opportunities to increase housing supply.

The Flatiron NoMad Partnership is committed to working with the City and other stakeholders to ensure that the "City of Yes for Housing Opportunity" and MSMX are implemented effectively.

Thank you for your time and consideration.

From: [Frances Casey](#)
To: [Land Use Testimony](#)
Subject: [EXTERNAL] City of Yes
Date: Thursday, October 24, 2024 10:48:49 PM

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Please say No to the City of Yes for housing Opportunity project 24DCP33Y_DL

Sincerely,
Fran
Queens

From: [frances mintz](#)
To: [Land Use Testimony](#)
Subject: [EXTERNAL] City of Yes for Housing Opportunity
Date: Wednesday, October 23, 2024 4:13:54 PM

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I am opposed to the City of Yes for Housing Opportunity. I have lived in this neighborhood for over 50 years and have seen the area get increasingly more congested with traffic. On alternate side of the street parking days, cars are now double parked since there are no parking spaces to be found. The local subway stations are jammed with people trying to get to work each day. Lastly, over 2,300 apartment units have been built in this neighborhood and I ask the question, how many of these apartments were built with low income renters in mind? My guess is the answer is very few. The City of Yes will help developers but will pay no regard to the quality of life to the average family in this neighborhood, whether low income or middle income. Please vote no to the City of Yes for Housing Opportunity.

Thank you,
Frances E. Mintz

[EXTERNAL] city of yes



Wed 10/23/2024 12:44 PM

To: Land Use Testimony <landusetestimony@council.nyc.gov>;

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Amending CoYHO will not work, it needs to be voted down.testtest

Frank Mugno

-

From: [Frank Roldan](#)
To: [Land Use Testimony](#)
Subject: [EXTERNAL] In support to remove parking mandates.
Date: Wednesday, October 23, 2024 4:15:04 PM

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Hello,

As someone who has lived in New York City (Brooklyn + Manhattan) for 26 years, I strongly support removing parking requirements. By eliminating these mandates, we can create a city that is more inclusive and equitable. It will open up space for much-needed affordable housing, giving more people access to live in our vibrant neighborhoods.

Additionally, lifting parking mandates will make our streets safer for pedestrians, allow for the creation of more parks and green spaces, and help expand bike lanes, encouraging healthier, more sustainable ways of getting around. This shift would not only benefit the environment but also enhance the overall quality of life for all residents.

Regards,

Frank Roldan

Harlem, NY. District 10

(formerly Downtown Brooklyn, District 2)

From: [Frederick W. Ramftl](#)
To: [Land Use Testimony](#)
Subject: [EXTERNAL] no on City of Yes
Date: Thursday, October 24, 2024 3:57:53 PM

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I, Frederick Ramftl oppose the City of Yes.



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Nuha Ansari
EXECUTIVE DIRECTOR

October 25, 2024

Honorable Kevin Riley
Chair, City Council Subcommittee on Zoning and Franchises
New York City Council
250 Broadway
New York, New York 10007

Re: FRIENDS of the Upper East Side Comments on City of Yes for Housing Opportunity

Chair Riley,

FRIENDS of the Upper East Side submits these written comments as an expansion of our public testimony on City of Yes for Housing Opportunity (COYHO) at the October 22, 2024 City Council Public Hearing. For 40+ years FRIENDS has worked to preserve architectural history, livability, and sense of place on the Upper East Side. We are a leading voice for common sense planning and land use, having led successful community efforts for contextual zoning and expanded historic district protections. We support balanced urban change on the Upper East Side.

FRIENDS firmly supports the stated goal of creating housing across the city and we support some of the thoughtful and imaginative proposals in City of Yes that would achieve this goal in a contextual and environmentally sound manner. For instance, we applaud the conversion and re-introduction of shared housing and Single Room Occupancy housing. Although there are not many SROs remaining on the Upper East Side, we believe the conversion and adaptive re-use of historic hotels would go a long way to provide housing while also ensuring that historic buildings are saved. We are also supportive of the provisions in City of Yes that would expand the eligibility of commercial to residential conversions.

But although COYHO promises “A little more housing in every neighborhood”, it does nothing to ensure that the housing would be affordable. Instead of creating strong incentives for developers to build affordable units, it is predicated on the idea that the market will regulate prices and that increasing housing supply would bring prices down. As we know from long experience on the Upper East Side, this leads to ever more tall, luxury residential developments, often at the expense of existing, relatively affordable housing in historic typologies such as tenements.

For well over a decade, Yorkville and other neighborhoods located on the Upper East Side have suffered from the demolition of hundreds of affordable units and small commercial spaces that have been bulldozed and replaced with ultra-luxury high-rises that provide large units and deluxe private spaces. COYHO would exacerbate this



situation with the Universal Affordability Preference, which would allow developers the choice of opting in to the program with the incentive of being allowed 20% more floor area, or to leave that on the table instead and build entirely market rate housing. We wonder what research the DCP has used to determine that this change would not merely lead to even more unaffordable, luxury developments and a corresponding loss of existing, relatively affordable units.

We strongly object to the fact that many of the proposed changes would have the effect of weakening the public review process, further depleting the opportunities that exist for the crucially important public review of projects that have a deep and lasting impact on our neighborhoods. The zoning text amendments would remove many actions from public scrutiny altogether. We urge the City Council to ensure that any DCP amendments retain and strengthen public review processes.

Below, we have highlighted our specific concerns with aspects of COYHO that would potentially impact the preservation of landmarks and historic districts and how much light, air and green space we have in our urban environments, which are of crucial importance in extremely high density areas like the Upper East Side. We are concerned about the substantial deregulation proposed in COYHO. Although it is being marketed as a series of very small changes and updates, the sheer number and scope of these changes could have enormous and far-reaching unintended consequences. We would like to see more research to justify the necessity of these amendments.

Landmark Transfer Development Rights (TDRs): We are concerned about the proposal to expand existing rules governing TDRs to receiving sites across a much wider area, including across streets and intersections. While we understand TDRs allow landmarked properties to generate revenue, there's a downside: receiving sites could gain an additional 20% floor area with no affordability requirements or adherence to the neighborhood character. We also strongly object to the removal of public input and TDR approvals without a ULURP process and City Council approval. We urge the City Council to ensure that the public review process is strengthened and retained in all situations. Public review serves as the truest indicator of local needs and priorities.

Accessory Dwelling Units (ADUs) and Open Space Regulations: The proposals within COYHO would reverse the trend of increasing open space and light/air requirements that have been established over the course of the last 100 years. For instance, they would reduce the space requirements for rear yards and walls with legal windows, and decrease court sizes. These changes would permit the reduction of rear yard sizes from 30 to 20 feet, further diminishing the "donut holes" within blocks that provide light, air, and green space. These "donuts" are even more important today with rising



temperatures. In some instances, COYHO proposals go even further, eliminating rear yard open space requirements entirely.

While some standards might be outdated, we urge the DCP to share research and reasoning behind these changes and to seek public input. We hope City Council members will assess the data to determine if the proposed changes would lead to a net positive outcome, balancing the need for additional housing with the importance of preserving light, air, and green space in our neighborhoods.

Campus Infill: The City of Yes for Housing Opportunity would also reduce the substantial open space requirements for "tower in the park" style campuses on the Upper East Side. Over the years, similar efforts to infill open spaces on housing estates with new buildings have largely failed because current zoning regulations made them prohibitively expensive and out of context. The City of Yes for Housing Opportunity does not tweak the regulations but lifts them entirely, opening up vast opportunities for developers, who would be allowed to build entirely market-rate housing in these areas. The reduction of open spaces within tower-in-the-park housing estates would be a huge loss for residents, and it is not clear what they would gain from the lifting of current zoning regulations.

Special Purpose Districts (Special Madison Avenue Preservation District): FRIENDS understands that Special Purpose Districts will not be eliminated under COYHO. However, we are concerned about the "one size fits all" approach where instead of special district zoning texts, provisions specific to special districts would be included within the citywide zoning text. This could over time loosen the current custom zoning in favor of a uniform approach, which could potentially undermine the special character of our Special Preservation Districts such as Madison Avenue. The special bulk regulations on Madison Avenue, for instance, which require buildings to taper as they go up, could be eliminated. While this act of deregulation would simplify and streamline New York's zoning text, we wonder if the DCP has fully considered the special character of the preservation districts and how the current zoning regulations have helped shape them and ensure their preservation.

We believe New York City needs a zoning update that fosters a livable and thriving city for all. This update should engage local residents in the zoning and land use process. It should also ensure that the creation of housing is equitable and prioritizes the preservation of existing housing stock in our densest neighborhoods, such as on the Upper East Side. We are concerned that COYHO could accelerate the pace of new luxury developments, further straining the availability of affordable housing options.

Having read and commented on the three sections of City of Yes in some detail over the last several months, we see many sensible and imaginative ideas for much-



needed updates to New York City's zoning regulations. We urge City Council to ensure that the Department of City Planning considers solutions that strengthen our neighborhoods, take into account the unique character of each community, and prioritize livability and the well-being of residents.

Thank you for your consideration.

Nuha Ansari
Executive Director



From: [GR](#)
To: [Land Use Testimony](#)
Subject: [EXTERNAL] City of Yes for Housing Opportunity
Date: Wednesday, October 23, 2024 5:47:02 PM

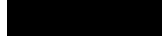
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My family, myself and many of our neighbors and friends throughout the city wish to register our strong OPPOSITION to the City of Yes Housing Opportunity proposal. It is detrimental to our neighborhoods' safety, character, and density.

We hope that city council members representing us and the wider city see through the vested interests that want to see this proposal enacted, and stand up for their constituents by REJECTING the "City of Yes" and VOTING NO.

Respectfully,

G. Roeburt



Fresh Meadows NY 11365

From: [Gabriel](#)
To: [Land Use Testimony](#)
Subject: [EXTERNAL] City of Yes for Housing Opportunity
Date: Wednesday, October 23, 2024 4:13:14 PM

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Please support ending parking mandates in new residential construction.

Thank you.

Gabriel Skop

Sent from my iPhone

[EXTERNAL] COY-WM City of Yes for Housing Opportunity

Gail Wasserman <

Wed 10/23/2024 3:26 PM

To: Land Use Testimony <landusetestimony@council.nyc.gov>;

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Dear City Council and Council Member Louis:

I want to express my concern, along with my fellow West Midwood and greater Flatbush residents and OPPOSE in its present form the ill-thought-out City of Yes for Housing proposal. In my estimation, it will cause many negative impacts on my neighborhood and many other neighborhoods throughout the City. Most importantly, it will result in little if any new affordable housing units.

As our city representatives, I ask you to please call for a halt to the proposal until the Mayor and City Planning Department seriously consult with the City's varied neighborhoods and come up with a proposal that meaningfully addresses their legitimate concerns. The proposal in its current form, does not.

Thank you.

Sincerely,

Gail Wasserman
West Midwood

[EXTERNAL] City Of Yes



Fri 10/25/2024 2:58 PM

To: Land Use Testimony <landusetestimony@council.nyc.gov>;

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To Whom It May Concern,

I oppose the "city of yes" proposal because it would further erode the quality of life in New York and therefore force the tax base out of the city.

Thank you,

Gary Colter

[EXTERNAL] City of Yes for Housing Opportunity - Remove Parking Requirements

Gary Roth <>

Wed 10/23/2024 10:21 AM

To: Land Use Testimony <landusetestimony@council.nyc.gov>;

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NYC has a housing shortage and parking requirements distort housing costs.

I support removing all parking requirements from the NYC zoning code.
By forcing the inclusion of parking in all developments you are creating transit deserts.

Thank You,

Gary Roth



New York, NY 10011

From: [Gary Roth](#)
To: [Land Use Testimony](#)
Subject: [EXTERNAL] City of Yes for Housing Opportunity
Date: Friday, October 25, 2024 11:33:58 AM

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When someone buys a car, their outlook changes.
They are only concerned with the happiness of their vehicle.
It's their most important and many times most valuable possessions.

Without their car... they cannot work, cannot shop, cannot see their friends and family.
Their car is more important than their significant other.

They believe that there is never enough parking, there is never enough roads.
This creates a self defeating feedback loop.
As there are more cars and more parking lots, there is more need for a car.

The City of Yes must remove the parking requirement and ensure we increase the number of places for people to live.
We need housing, not parking.

-Gary Roth

[REDACTED]

New York, NY 10011

[EXTERNAL] City of Yes testimony

Denis Montalbetti



Mon 10/21/2024 9:20 PM

To: Land Use Testimony <landusetestimony@council.nyc.gov>;

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To Whom It May Concern:

I am opposed to the zoning and planning changes proposed by The City of Yes. We purposely moved to Pelham Gardens in the Bronx to escape the high density of Brooklyn. We do not want to see our and neighboring suburbs changed with increased mass transit and high density housing. We do not want the increase in population and infrastructure pressures that come with "affordable housing" developments. We have already experienced a decline in the quality of life in our neighborhood over the last number of years.

I say NO to The City of Yes.

Gay Campbell
Pelham Gardens, Bronx

[EXTERNAL] City of Yes Housing Opportunity



Fri 10/25/2024 4:12 PM

To: Land Use Testimony <landusetestimony@council.nyc.gov>;

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I would expect that by now the Mayor and his planners would have figured out that in a city of over eight million residents, living in very varied communities, a poorly thought out, one size fits all proposal would not be presented as a solution to the perceived housing shortage. Please reject this proposal and ask the administration to come up with a set of proposal created in partnership with the varied communities of our city.

George Glatter
West Midwood

Sent from my iPhone

[EXTERNAL] RE: CITY OF YES FOR HOUSING INITIATIVE WRITTEN TESTIMONY FROM TSIP

Paige Cimino <



Wed 10/23/2024 12:55 PM

To: Land Use Testimony <landusetestimony@council.nyc.gov>;

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To whom it may concern;

I, George Kalajian, support the city's efforts to tackle the housing crisis by easing restrictions and expanding affordable housing. However, it is equally important to preserve the local industries that make New York City a global leader—particularly the specialty garment manufacturing sector that has long been the heart of the Garment District. This neighborhood is not only a fashion hub but also a key part of New York's identity, serving Broadway, film, television, and the broader fashion industry. It is home to fabric and notion suppliers, artisans, and specialty legacy makers whose skills drive creativity and innovation across many fields.

As the city advances housing expansion, we strongly encourage the adoption of incentives that protect maker and manufacturing spaces in the Garment District. These industries offer stable, quality jobs and are fundamental to a vibrant local economy. Without these protections, we risk losing the infrastructure that supports Broadway's iconic productions, the fashion that bolsters New York's global reputation, and the costuming that brings film and television to life. By ensuring affordable housing and our world-class manufacturing sector can thrive together, we can secure a future where New York remains a center of opportunity, innovation, and creativity for all.

Thank you for taking the time to accept testimony on behalf of the makers.

Best,
Tom's Sons International Pleating

GEORGE M.
JANES &
ASSOCIATES

October 25, 2024

NEW YORK, NY 10128

www.georgejanes.com

T:
E:

Kevin Riley, Chair;
Members of the Subcommittee on Landmarks, Sitings, & Public Dispositions
Committee
New York City Council
250 Broadway
New York, NY 10007

RE: City of Yes for Housing
Opportunity Testimony

Dear Chair Riley and Council Members:

The following is my written testimony on City of Yes for Housing Opportunity (COYHO). I reviewed the application for seven different Manhattan Community Boards and helped their members understand the proposal, but the comments below are solely my own.

Summary

I was profoundly disappointed with how the COYHO zoning amendments were developed and explained to the public, community boards, CPC, and to Council. The proposal was not fully explained, and to my shock DCP staff made false and misleading statements throughout the process. These comments document a tainted process in the hope that 1) Council will reject all but the most essential parts of COYHO, and 2) attention to the failures of this process will lead to better processes in future actions. Simply, we cannot adopt any new land use policy without being completely open and honest with the public on the new land use policy.

The crisis in NYC is an affordability crisis

COYHO is a supply-side policy solution that hopes that new market rate housing will reduce rents and create affordable housing. This philosophy should be rejected along with most of COYHO. But NYC is in an affordable housing crisis, and there is an affordable housing policy in COYHO that can help to address that crisis.

UAP is lacking and should have been much more effective, but it is better than what we have now. Our current zoning provides no zoning options for affordable housing in most of New York City. Unlike most jurisdictions that use zoning as a tool to provide affordable housing, most of New York City has no zoning options for affordability. UAP addresses this in part by allowing zoning bonuses for R6 through R10 districts. This is still well less than half of the City, and COYHO provides no options at all for affordable housing in R1 through R5 districts, but

UAP still covers much more of the city with an affordable housing option than our current zoning.

After the lead-up to COYHO—which raised expectations—the fact that there is only one optional affordable housing policy, which covers only a minority of the City, is so disappointing. Additionally, the limitations of UAP bounds Council’s response. If Council is able to modify UAP so that it is more effective, such modifications would be welcome. The Association for Neighborhood and Housing Development (ANHD) provided Council comments that would make UAP more effective. I will not repeat those comments here, other than to provide support for such changes.

Council should reject the rest of COYHO

All policy, but land use policy especially, derives its legitimacy through the consent of people governed by those policies. If the public does not understand the proposal, if the policies are not explained fairly, the policy proposal loses its legitimacy. DCP has repeatedly misrepresented the proposal to the public, Planning Commissioners and the Council. As a result, COYHO is not a legitimate policy proposal, and so it should be rejected, with exceptions for the portions that can directly deal with the existing housing affordability crisis.

The remainder of my comments document a sampling of DCP’s failures during this process. I’m sure that staff at City Council have had similar experiences and that these examples simply reinforce those experiences. Good policy needs to be legitimately formed and that legitimacy is missing in COYHO.

DCP promised the public an additional CPC hearing

On July 10, the CPC held a public hearing on the application. People did not attend that public hearing because DCP sent an email on July 8 to the leadership of all the uptown Manhattan Community Boards, copying DCP’s Manhattan office leadership, stating:

The first Public Hearing on the City of Yes for Housing Opportunity Zoning Text Amendment is scheduled for Wednesday, July 10, 2024, at 10:00 am. This is an additional opportunity for you and your constituencies to share your concerns and recommendations with the City Planning Commission and to obtain further information regarding the proposal, public review, and potential edits. More public hearings will be scheduled in the upcoming weeks and months, so please keep an eye out for notices [on our CPC main page](#).

I was astounded that the CPC would hold “more public hearings,” since this is not typical. So I followed up with the staffer asking if he really meant that the CPC would hold an additional hearing after the July 10th hearing, and the staffer responded:

Yes, there will be at least one additional hearing before the vote. Additionally, the CPC will continue to accept testimony up to the vote date (tentatively in September)

A few days later, after the CPC hearing, I was devastated to receive the following unsolicited email:

I made a mistake in my earlier communication regarding the City of Yes for Housing Opportunity's next steps. The City Planning Commission will hold post-hearing discussions and follow-ups at Review Session. However, there will not be another public hearing

I was devastated because I amplified DCP's communication, sharing it with my networks. I told people there would be another hearing, and that if later in the summer was better for them, they could wait and still be heard. Some listened to me and these people were not heard because either DCP made a mistake or intentionally discouraged testimony at the July 10 hearing.

This misinformation had serious consequences. There are people with an interest who were not heard by the CPC. Yes, they can submit written testimony but the CPC does not acknowledge, publish or respond to this testimony. The person giving testimony cannot know if they were heard. Further, speaking at the public hearing not only informs the CPC, but it also informs the larger public. Hearings are a fundamental part of our process and DCP told Manhattan Community Boards 9, 10, 11 and 12 that they could stay home on July 10, testify later and still be heard.

At best, this can be interpreted as a profound error. At worst, it was a deliberate way to get some of the people most impacted by the proposal's biggest bulk change (campus infill) to not come to the hearing, so that their concerns would not be heard by the public. Either way, the fact it happened is deeply disturbing. DCP's misinformation meant that not all of the people were heard on this matter, which undermines the proposal's legitimacy.

This is not the only misinformation DCP provided during public meetings

There have been other false statements made by more senior DCP staff that has repeated and not acknowledged as being false.

As stated, COYHO's only affordable housing program is Universal Affordability Preference (UAP), which is an optional bonus that is granted to developments that provide affordable housing. During public discussion of the proposal, Community Board members asked if an optional affordable housing solution like UAP was the most effective solution for affordable housing in NYC. They asked about a zoning program that would require affordable housing in all projects, such as the affordable housing requirement used in Westchester County.

In 2009, Westchester County entered into a settlement with the U.S. Department of Housing and Urban Development to increase its efforts to affirmatively further fair and affordable housing. The settlement required Westchester County to develop more affordable housing. Their primary solution was to require 10% affordable housing in all projects of five or more units. The County developed a model ordinance and helped to facilitate its implementation in the zoning laws of 31 local jurisdictions. For more than a decade, Westchester County has been producing affordable housing using a 10% affordable housing requirement.

At the CPC's July 22, 2024 Review Session, the DCP staff person leading COYHO said the following regarding Westchester's 10% affordable housing requirement:¹

Our regional planning division at City Planning which has close relationships with many of those jurisdictions was unable to find any units, any affordable income-restricted units that had been created under those mandates, at all.²

In a June 10, 2024 public meeting at Manhattan Community Board 1 (CB1), this same person said:

There are jurisdictions around the country even jurisdictions that are not too far away some in Westchester in fact that use affordability mandates as a way to prevent development from happening. Let's just render development infeasible through affordability mandates.³

When I Google "Affordable Housing Westchester County," the first result is for Westchester County's [affordable housing lottery page](#). As of today, it lists three open and waitlisted lotteries and 32 closed lotteries. A simple four-word Google search would have let DCP know that the statement they gave to the CPC on July 22 was false. Westchester County has produced substantially more than zero units of income restricted affordable housing with their 10% affordable housing requirement. Again, the DCP staffer was either willfully ignorant or knowingly gave false information to the CPC at the July 22 review session.

Further, the statement DCP made at the CB1 meeting, where staff explicitly said that Westchester's affordability requirements were put in place to "prevent development from happening," and to "render development infeasible through affordability mandates" ignores the fact that this program was put in place in Westchester County as a part of a settlement agreement with the Obama Administration's Department of Housing and Urban Development (HUD) to enforce federal law to affirmatively further fair housing. DCP publicly stated that

¹ Elsewhere affordable housing requirements are described as a "magic wand."

² <https://www.youtube.com/live/lalr46jCOxc?feature=shared&t=6711>

³ <https://youtu.be/snsF4oXeWX8?t=1586>

Obama’s HUD required a program in Westchester County that would “render development infeasible.”

It’s an incredible position to take. Again, when I Google “Affordable Housing Westchester Settlement,” the [first result](#) provides a detail of the settlement agreement and the [second result](#) is a press release announcing that the county was found to be in substantial compliance with the Consent Decree and a federal housing monitor was no longer needed because it met the conditions of the settlement and produced the required affordable housing. This is easily knowable information. The representations of Westchester’s affordable housing requirement was either willful ignorance or a willful lie.⁴

Will UAP actually perform and produce substantial amounts of affordable housing? Would an affordability requirement where 10% affordable housing was required in all developments be better? I don’t know because the work evaluating different affordability housing policy solutions is missing; it has either not been done or has not been made public. Instead, it appears that DCP took a position with the zoning amendment and then simply attacked anyone who even mentioned a policy that was contrary to that position, going so far as to misrepresent facts to the public.

DCP either made mistakes and then doubled-down on the misinformation, or they simply proceeded with incorrect information from the start. Either way, COYHO has been tainted with a profound error that we should all find deeply disappointing.

COYHO has major changes to zoning which were barely mentioned by DCP during the process

During the public review, DCP organized its presentation by 15 topic areas and it solicited feedback from Community Board by these 15 topic areas. Amazingly, these 15 topic areas omit some of COYHO’s biggest changes. Some are only seen by reading the entire zoning text.

For example, COYHO modifies residential zoning standards that have been in place since 1961 or longer, including:

⁴ This misinformation is astounding, in part, because it is so easy to disprove; you just have to ask a planner that works in Westchester County. When I shared the misinformation DCP promoted at the July 22 CPC meeting with a Westchester County planner, their response was: “Oh no! Inclusionary housing mandates totally work. That was how we got most of our units built. We found that most developers were totally fine with a 10% affordable inclusion - they would just factor it into their development costs. Sometimes it could result in higher rents for the market rate units, but all the units get rented anyway because housing demand is so high. It’s unbelievable that they are trying to push this new zoning through without mandatory affordable housing inclusions. There should be both a mandatory inclusion and a bonus on top of that for even more affordable housing.”

- Required rear yards are reduced from 30 feet to 20 feet
- Minimum size of side yards are reduced from 8 feet to 5 feet
- Space for legal windows is reduced from 30 feet to 20 feet
- The minimum size of courts for legal windows is reduced from 1,200 SF to 800 SF
- Maximum lot coverage for interior and through lots is increased from 70% to 80%
- Increases maximum tower coverage

Not one of the 15 topic areas deal with the wholesale changes to residential building standards, which are the basic building blocks of the form of the City. When changes to residential standards were discussed at all, they were discussed in the context of one of the 15 topic areas. For instance, one of the topic areas is changing zoning to permit accessory dwelling units (ADUs). The discussion of ADUs mentions that changes to rear yards are necessary to permit accessory dwelling units, but that doesn't tell the whole story. COYHO changes required rear yards *everywhere*, on new buildings, on existing buildings, regardless of the presence or absence of an accessory dwelling unit.

Changes to the minimum size of the rear yard and courts, legal windows and the expansion of permitted obstructions are significant changes to our zoning. Instead of featuring these major changes to residential standards, they were ignored in DCP's explanatory presentations. After I highlighted these changes to the Boards I served, DCP did acknowledge the change in courts and yards and explained to some of these boards how they believed that lowering the residential standards for light and air would actually improve access to light and air. Really.

Other changes were never explained, at least as far as I'm aware. For instance, I still don't know what the planning rationale is for reducing side yards from eight feet to five feet. You can fit most motor vehicles in a space that is eight feet wide, but you can't in a space that's five feet wide. Was that a consideration when this change was being proposed? I have no idea since I haven't seen or heard any explanation for the change.

To be clear, I'm not saying that these residential building standards shouldn't change. Just because we've been building with these standards for a long time doesn't mean they shouldn't be revisited. The City now has widespread air conditioning and inexpensive electric lighting, which wasn't the case when most of these light and air standards were developed in the mid-20th century, and so maybe changes to light and air standards are appropriate. But what should those changes be? Shouldn't we know the effect of less light and air on the health and well-being of City residents? Perhaps there should have been a citywide discussion on the changes, how much they should change, and the reasons for the changes, since they impact everyone. Instead, COYHO proposed these changes,

didn't clearly disclose them, and when they were mentioned, the rationale is limited and data used to inform the change is missing.

If you believe that an informed citizenry should consent to these changes, they have to know what they are and why they are being implemented. These changes should have been disclosed, explained and debated in detail, and they weren't.

Combination effects of COYHO changes are unknown and undisclosed

Our regulations form a complex adaptive system where new regulations interact with each other and existing regulations and the result may produce unintended consequences, or at least consequences that have not been disclosed. There has been no attempt to publicly explore how the many different COYHO changes might interact with each other and what the product of those interactions might be.

For instance, one of my bigger concerns is that the changes in COYHO provide owners a path forward to removing virtually all of the City's residential plazas. Virtually all residential plazas in New York City were built before 1991 and used a bonus program that provided a 20% floor area bonus for a publicly accessible plaza often called a POPs. Eventually, the residential plaza bonus was deleted and a new building form, the tower-on-a-base form was required for towers in most of the areas that had previously permitted POPs. Consequently, virtually every tower constructed with a residential POPs is non-complying because they are standard towers. Both current zoning and COYHO prohibits standard towers and requires a tower-on-a-base building form in most of the districts that permitted residential plazas. As a result, the vast majority of buildings that currently have residential POPs are non-complying, were built before 1991, and so they qualify for COYHO's 75-25 authorization.

Proposed 75-25 is a new authorization for bulk modifications for non-complying buildings built before 1991. It is another one of the significant changes proposed by the applicant to the Zoning Resolution which was never mentioned, and was only discovered by reading to page 898 of the zoning text. 75-25 provides a pathway for all of non-complying buildings to remove their existing residential POPs. Here's how: Proposed 75-25 provides a 20% increase in FAR. This 20% increase in FAR can be used to replace the 20% bonus provided by the residential plaza, which means that the residential plaza is no longer necessary to keep the project within compliance. With this CPC authorization, the public plaza can be privatized.

But would the CPC do that? Simply allow the privatization of a POPs through authorization? Probably not, but this change becomes more attractive if the plaza can be removed entirely and replaced with a better use. The issue, of course, is from where would the floor area for an addition come? That replacement floor area would come from a different COYHO proposal that could be used in combination with proposed 75-25. Proposed 23-231 provides what we now call

Quality Housing floor area exemptions to alterations and additions. Roughly, these exemptions will add up to roughly 10% of the building's floor area. This newly exempted floor area could be reused to build-out the existing plaza with an expanded building that contains either residential, community facility and/or commercial uses if permitted by the underlying zoning.

I expect DCP would welcome applications for the elimination of most residential plazas, especially if it was done through a commercial extension at the ground floor that would bring the streetwall out to the streetline and bring active uses where there is passive open space. These spaces may only involve a ground floor addition, but I expect that DCP would likely consider this good urban design and would encourage applications that replaced passive plazas with active uses, similar to what DCP proposed in the 2016 Water Street text amendment, which amended zoning to permit owners to fill in arcades with commercial uses with a CPC authorization.

I speculate the scenario presented is actually not an unintended consequence, but an intentional pathway to provide for the removal of the City's existing residential plazas, and the applicant simply chose not to disclose the consequence of the change. Most residential plazas are hated by the owners of those residential plazas, because they cost money, don't produce revenue, and are often the subject of many complaints. We should not be surprised that COYHO would provide a pathway for their removal when we consider that the founding plan⁵ was developed by the New New York Panel, a group largely driven by real estate interests.

I ask Council: Are you comfortable that you understand how all the COYHO changes will function and interact and change the built form of the City? If not, you must limit the potential for unintended consequences by modifying the proposal.

Final thoughts

DCP corrupted the application process with misinformation, half-truths, and omissions of significant proposals. Council should make clear to the administration that it will not be a party to this flawed process and it will radically modify the proposal, keeping only elements necessary to address the housing affordability crisis. Further, it is my hope that these comments will bring attention to these failures and result in better applications in the future. Certified planners have an ethical obligation to serve the public interest, and it is *never* in the public interest to mislead the public, regardless of the motivation. Truth is especially important in land use planning, which has made so many serious errors impacting countless lives. Even planners with the best of intentions have made decisions that have had terrible and profound consequences. This is why our

⁵ https://edc.nyc/sites/default/files/2023-02/New-NY-Action-Plan_Making_New_York_Work_for_Everyone.pdf

process needs to be open, truthful and honest. We all need to be making decisions based upon the same set of facts and that has not happened with COYHO.

Consequently, Council should make the difficult decision to heavily modify COYHO, keeping only UAP and related modifications to the building envelope, to address the housing affordability crisis and reject the balance, with an instruction to DCP that they must do a better job fully explaining their applications.

Thank you for your service to the people of the City of New York. Should you have any questions or would like to discuss, please feel free to contact me directly on my mobile at [REDACTED]

Sincerely,

A handwritten signature in black ink, appearing to read 'G. Janes', written in a cursive style.

George M. Janes, AICP
George M. Janes & Associates

Attachment: email exchange with DCP regarding additional public hearing

Subject: RE: COY Housing Opportunity- Upper Manhattan Public Review Follow-up
Date: Mon, 8 Jul 2024 20:19:05 +0000
From: Jose Trucios (DCP) <[REDACTED]>
To: barryweinberg <[REDACTED]>, kdixoncb10 <[REDACTED]>, Angel Mescaín <[REDACTED]>, chair-cb11m.org <[REDACTED]>, wb1905 <[REDACTED]>, kdiazcb12 <[REDACTED]>, Smith, Ebenezer (CB) <[REDACTED]>, Eutha Prince <[REDACTED]>, Nilsa Orama <[REDACTED]>, George M. Janes <[REDACTED]>, marquisalexander4harlem <[REDACTED]>, Garcia, Paola (CB) <[REDACTED]>, Paniagua, Shinelle <[REDACTED]>, signesings <[REDACTED]>, liz.waytkus <[REDACTED]>, Jason Villanueva <[REDACTED]>, Whyte, Minah <[REDACTED]>
CC: Audrey Wachs (DCP) <[REDACTED]>, Trevor Lovitz (DCP) <[REDACTED]>, Nabeela Malik (DCP) <[REDACTED]>, Erik Botsford (DCP) <[REDACTED]>, Lara Merida (DCP) <[REDACTED]>, Danielle J. DeCerro (DCP) <DDECERBO@planning.nyc.gov>, Veronica Brown (DCP) <[REDACTED]>, Winnie Shen (DCP) <[REDACTED]>, John Mangin (DCP) <[REDACTED]>

Good Afternoon, Community Board Leaders,

The first Public Hearing on the City of Yes for Housing Opportunity Zoning Text Amendment is scheduled for Wednesday, July 10, 2024, at 10:00 am. This is an additional opportunity for you and your constituencies to share your concerns and recommendations with the City Planning Commission and to obtain further information regarding the proposal, public review, and potential edits. More public hearings will be scheduled in the upcoming weeks and months, so please keep an eye out for notices on our CPC main page.

Please note that the City Planning Commission can only address land use and zoning issues. This means that non-land-use related topics such as requiring union labor, additional sanitation, or increased policing would be considered as supplementary commentary.

To Participate In-Person:

Join us in the City Planning Commission Hearing Room, located in the Lower Concourse at 120 Broadway, New York, NY 10271
 (Anyone attending a meeting in person is encouraged to wear a mask)

To Participate Online (preferred):

Details on how to testify by videoconference or calling from any phone will be posted on nyc.gov/engage one hour before the meeting.

After registration, speakers will receive an email with a Zoom link.
 "Doors open" to the meeting approximately 30 minutes before the meeting begins, and live streaming starts about 10 minutes before the meeting begins.
 Speakers will be promoted to panelists and allowed to unmute themselves and turn on their cameras if they choose to.
 Make sure to turn OFF the live stream when testifying to avoid feedback.

Note: If you do not wish to testify but would like to watch the meeting via live stream, please visit bit.ly/NYCPlanningStream

Jose Trucios
 Upper Manhattan Team Leader • Manhattan Office
 (He/him)

NYC Department of City Planning
 [REDACTED] (O)
 120 Broadway, 31st Floor, New York, NY 10271
 Visit our website | Twitter | Instagram | The Zoning Resolution

Subject: Re: COY Housing Opportunity- Upper Manhattan Public Review Follow-up
Date: Thu, 11 Jul 2024 14:34:14 -0400
From: George M. Janes <[REDACTED]>
To: Jose Trucios (DCP) <[REDACTED]>

Jose,

Are there are there really going to be additional hearings? Any idea when and how they'll be done? Very interested in knowing more.

I think it's a great idea and encourage it, but, as you know, it's also surprising.

Thanks,

George

--

George M. Janes, AICP

George M. Janes & Associates

Office: [REDACTED]

email: [REDACTED]

Web: www.georgejanes.com / S [REDACTED] / Twitter: @geojanes

Subject: Re: [EXTERNAL] Re: COY Housing Opportunity- Upper Manhattan Public Review Follow-up
Date: Thu, 11 Jul 2024 18:46:05 +0000
From: Jose Trucios (DCP) <[REDACTED]>
To: George M. Janes <[REDACTED]>

Hi George,

Yes, there will be at least one additional hearing before the vote. Additionally, the CPC will continue to accept testimony up to the vote date (tentatively in September). I'll be sure to keep you updated once I hear more.

Take care,

Jose

Jose Trucios

Upper Manhattan Team Leader • Manhattan Office
(He/him)

NYC Department of City Planning

[REDACTED] (O)

120 Broadway, 31st Floor, New York, NY 10271

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Subject: Re: [EXTERNAL] Re: COY Housing Opportunity- Upper Manhattan Public Review Follow-up
Date: Thu, 11 Jul 2024 15:51:13 -0400

From: George M. Janes <[REDACTED]>
 To: Jose Trucios (DCP) <[REDACTED]>

That's great to hear. I've always hated these marathon hearings and spreading them out makes it much better for all I think.

Thanks for letting folks know.

Subject: RE: [EXTERNAL] Re: COY Housing Opportunity- Upper Manhattan Public Review Follow-up
 Date: Mon, 15 Jul 2024 20:41:26 +0000
 From: Jose Trucios (DCP) <[REDACTED]>
 To: George M. Janes <[REDACTED]>

Hi George,

I made a mistake in my earlier communication regarding the City of Yes for Housing Opportunity's next steps. The City Planning Commission will hold post-hearing discussions and follow-ups at Review Session. However, there will not be another public hearing. All written comments will be accepted for CPC review until the vote in the fall (September 2024), and any resolutions received after the CPC vote will be passed on to the City Council. The next opportunity for the public to testify will be at the City Council Hearing. We will make sure to keep you and our other community leaders informed about upcoming key dates and milestones. Apologies for the confusion,

Jose

Jose Trucios
 Upper Manhattan Team Leader • Manhattan Office
 (He/him)

NYC Department of City Planning
 [REDACTED] (O)
 120 Broadway, 31st Floor, New York, NY 10271

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Subject: Re: [EXTERNAL] Re: COY Housing Opportunity- Upper Manhattan Public Review Follow-up
 Date: Mon, 15 Jul 2024 16:49:43 -0400
 From: George M. Janes <[REDACTED]>
 To: Jose Trucios (DCP) <[REDACTED]>

Oh, that's very disappointing. I know some people didn't testify on the 10th because of this. I encourage you to reach out to the boards to whom you sent this communication to clarify.

Still, mistakes happen, thank you for letting me know.

--

George M. Janes, AICP
 George M. Janes & Associates
 Office: [REDACTED]
 email: [REDACTED]
 Web: www.georgejanes.com / [REDACTED] / Twitter: @geojanes

From: [George M](#)
To: [Land Use Testimony](#)
Subject: [EXTERNAL] Opposition to City of Yes Housing
Date: Wednesday, October 23, 2024 4:41:19 PM

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe. Report suspected phishing emails with the Phish Alert Button or forward them to phish@oti.nyc.gov as an attachment.

To Whom it May Concern:

The City of Yes plan, a 1 glove fits all agenda, is a poor fit for our Unionport community in the Bronx. This proposal will put additional burden on already overwhelmed infrastructure in flood prone areas. Place stress on already overcrowded and many underperforming schools. In most situations increased population and density will jeopardize public safety. Our police force, fire department, EMS, health and human services cannot withstand additional work loads. This aggressive plan will remove parking mandates for new development projects. Our car- centric, low density R 1 - R 5 neighborhoods are already parking deprived. A housing crisis is the alleged reason for this over reaching plan. However, allowance of tens of thousands of new entrants to our city while there is a crisis is akin to strategically placing additional holes in a sinking ship. New York City cannot maintain their sidewalks Over 9,000 sidewalks damaged by tree roots await repair. The repair wait list exceeds 5 years. New York City please fix what you have before adding more. Go back to the drawing board and do a district by district assessment. Determine which fingers properly fit the gloves and bring a modified product back to the respective council members and their constituents for approval. Force feeding creates a gag reflex. This plan in its current state is not digestible for many New Yorkers. Thank you in advance for your anticipated cooperation.

Sincerely

George Matranga

[REDACTED]

Bronx, New York 10462

Sincerely

From: [REDACTED]
To: [Land Use Testimony](#)
Subject: [EXTERNAL] Rejection of City of Yes
Date: Thursday, October 24, 2024 8:48:13 AM

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To Whom it May Concern:

The City of Yes plan, a 1 glove fits all agenda, is a poor fit for our community. This proposal will put additional burden on already overwhelmed infrastructure in flood prone areas. Place stress on already overcrowded and many underperforming schools. In most situations increased population and density will jeopardize public safety. Our police force, fire department, EMS, health and human services cannot withstand additional work loads. This aggressive plan will remove parking mandates for new development projects. Our car-centric, low density R 1 - R 5 neighborhoods are already parking deprived. A housing crisis is the alleged reason for this over reaching plan. However, allowance of tens of thousands of new entrants to our city while there is a crisis is akin to strategically placing additional holes in a sinking ship. New York City cannot maintain their sidewalks Over 9,000 sidewalks damaged by tree roots await repair. The repair wait list exceeds 5 years. New York City please fix what you have before adding more.

Go back to the drawing board and do a district by district assessment. Determine which fingers properly fit the gloves and bring a modified product back to the respective council members and their constituents for approval. Force feeding creates a gag reflex. This plan in its current state is not digestible for many New Yorkers.

Thank you in advance

Gertrude Dittiger Siavichay

[REDACTED]

Bronx, NY 10465

[EXTERNAL] Land Use Testimony for City of Yes: END PARKING MANDATES!

GianCarlos <

Wed 10/23/2024 12:14 PM

To: Land Use Testimony <landusetestimony@council.nyc.gov>;

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To whom it may concern,

I support lifting Parking Mandates and City of Yes: Housing Opportunity.

Thank you!

Gian

From: [Giancarlo Pancheri](#)
To: [Land Use Testimony](#)
Subject: [EXTERNAL] City of Yes for Housing Opportunity
Date: Wednesday, October 23, 2024 4:40:33 PM

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I think it is unwise for the government to have such a profound role in where housing and business can and cannot be built. The government simply has no way of knowing where is the best place to put a deli, or a townhouse, or a daycare. That should be left to the free hand of the market. If the government were to control how many chairs could be produced in a given year than that would be decried as communism, yet we allow government to do that with land use. Government should only regulate the most offensive uses of land such as industry. As for parking mandates the same principle applies. Parking Mandates are completely arbitrary. We could be overbuilding parking or we could be under building parking. The government has no way of knowing how many spots different building require. It's a one size fits all approach. If the government is concerned about the impact a building would have on parking, it should require the developer to conduct a study to determine how many spots are needed and then allow the developer the discretion of whether to build those spots. Accessory Dwelling units should be legalized. If there are concerns about safety and overcrowding, the correct response would be tighter regulation as opposed to outright bans. Banning ADU will not stop illegal units that will inevitably become vulnerable to flooding and other safety hazards due to lack of regulations. I hope the council will see the wisdom in adopting the City of Yes's reforms, as well as considering additional reforms in future. These reforms are important to restoring rights that have been wrongly deprived from property owners, as well as reducing the cost of living in the city.

From: [Gina Rolon](#)
To: [Land Use Testimony](#)
Subject: [EXTERNAL] NO TO CITY OF YES
Date: Wednesday, October 23, 2024 5:28:01 PM

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To Whom it May Concern:

The City of Yes plan, a 1 glove fits all agenda, is a poor fit for our community. This proposal will put additional burden on already overwhelmed infrastructure in flood prone areas. Place stress on already overcrowded and many underperforming schools. In most situations increased population and density will jeopardize public safety. Our police force, fire department, EMS, health and human services cannot withstand additional work loads. This aggressive plan will remove parking mandates for new development projects. Our car-centric, low density R 1 - R 5 neighborhoods are already parking deprived. A housing crisis is the alleged reason for this over reaching plan. However, allowance of tens of thousands of new entrants to our city while there is a crisis is akin to strategically placing additional holes in a sinking ship. New York City cannot maintain their sidewalks Over 9,000 sidewalks damaged by tree roots await repair. The repair wait list exceeds 5 years. New York City please fix what you have before adding more. Go back to the drawing board and do a district by district assessment. Determine which fingers properly fit the gloves and bring a modified product back to the respective council members and their constituents for approval. Force feeding creates a gag reflex. This plan in its current state is not digestible for many New Yorkers. Thank you in advance for your anticipated cooperation.

Gina Rolon

Bronx NY 10465

Sent from my iPhone

[EXTERNAL] Land Use Testimony for City of Yes: END PARKING MANDATES!

Gisselle Sanchez <[REDACTED]>

Fri 10/25/2024 9:36 PM

To: Land Use Testimony <landusetestimony@council.nyc.gov>;

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe. Report suspected phishing emails with the Phish Alert Button or forward them to phish@oti.nyc.gov as an attachment.

Hello,

I support lifting Parking Mandates and City of Yes: Housing Opportunity.

I believe that existing parking mandates are significantly handicapping housing production, while contributing to greater car use in our region, which is already costing us greatly in terms of air pollution, traffic congestion, emergency vehicle response times, and public space use/access.

Zipcode: 11226

Thank you,

Gisselle Sanchez

[EXTERNAL] No to City of Yes

Glen Parker <

Wed 10/23/2024 2:02 PM

To: Land Use Testimony <landusetestimony@council.nyc.gov>;

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City of Yes really is a threat on many levels, especially the **Transit Oriented Development (TOD)** piece. I am against it.

I live in **Prospect Park South**. If passed, TOD would mean every corner of **Victorian Flatbush** would be susceptible to demolition of one and two family homes - typically lovely turn-of-the-century Victorian houses - to be replaced with up to 5 unit, 3 - 5 story apartment buildings. Closest to us, every house on the southern side of Beverley Road could be converted. And one or two... or maybe three houses in on the side streets, (the plan is very vague,) could be knocked down and converted. This repeats on major corridors all the way out to Avenue H, and beyond.

Although there are provision that new buildings should match surrounding buildings height, such height restrictions are easily overcome even under current zoning regulations. And there's no provision about any new building align with the neighborhood aesthetic. And so they will likely be the opposite - cheaply built stacked cinderblock buildings that destroy the character of the neighborhood. Also, there is *nothing* in the TOD section calling on any of these apartments to be built to provide low-cost housing. **So what is even the point?**

So the TOD will 1) knock down dozens, or hundreds of beautiful Victorian Homes, 2) allow ugly out of character crappy buildings to replace them (sure to be marketed as LUXURY!.) 3) and only provide a few more apartments at market rates.

The city is in a housing crisis and solutions need to be found. Please note that our Community Board 14 already upzoned Coney Island Avenue and other major corridors to increase housing in 2009, and this planned has worked well. But the TOD (Transit oriented development) provides no new low cost housing and is mostly a boondoggle for small scale real estate developers.

Just say no.

Thank you,

Glen L. Parker



From: [Grace Hong](#)
To: [Land Use Testimony](#)
Subject: [EXTERNAL] Remove parking requirements
Date: Wednesday, October 23, 2024 12:04:50 AM

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Hi,

I'm writing in support of eliminating parking mandates as part of the "City of Yes" initiative. New York City desperately needs this kind of change to allow more housing to be built, along with reducing unnecessary construction costs, encouraging public transit use, and working towards a cleaner, more sustainable city. It's a simple way to expand housing options and quality of life for all New Yorkers, and we have a unique opportunity to make New York City a model for sustainable urban development in the States.

Thank you for considering my feedback.

[EXTERNAL] Please vote YES on City of Yes!

GE Cabarle <

Wed 10/23/2024 11:32 AM

To: Land Use Testimony <landusetestimony@council.nyc.gov>;

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Good morning,

I am a single trans man living in Astoria. My life has been radically transformed by being able to live in a single bedroom, but at the moment to do so I have to pay half of my income in rent because single bedrooms are so rare. I cannot and don't want to live in roommate housing, because like most trans people I have had a lot of bad experiences with roommates. Living by myself in New York City has been my dream and when I attained it at the age of 30 it was one of the happiest days of my life. I would like others like me to have that same opportunity.

I don't drive due to disability and lack of desire to and I'm tired of cars demanding where housing should go. I would happily live in a building full of other single renters, or a converted unit with a small landlord, especially if it were more affordable than my current apartment. We need more affordable housing in Astoria in particular, especially because a lot of people who work for the health department (like myself) live here. If the City workers are pushed out, there will not be many people left and businesses will suffer.

I am imploring you to vote yes on these policy proposals. They are all common sense and would allow me to continue serving the city to the best of my ability as a public servant.

Best,

Grayson Eli Cabarle, constituent of Tiffany Caban

From: [Greg Montesanto](#)
To: [Land Use Testimony](#)
Subject: [EXTERNAL] City of Yes
Date: Wednesday, October 23, 2024 7:42:46 AM

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I oppose the City of Yes Plan. It is not good for the city and especially Staten Island.
Sent from my iPhone

[EXTERNAL] City of Yes -- Please vote NO

Gregory Kinsella <>

Fri 10/25/2024 5:38 PM

To: Land Use Testimony <landusetestimony@council.nyc.gov>;

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe. Report suspected phishing emails with the Phish Alert Button or forward them to phish@oti.nyc.gov as an attachment.

Dear City Councilmembers,

I ask that you vote NO to City of Yes. This plan provides a one size fits all solution to a city of diverse neighborhoods. It makes no sense to strip community input and special districts.

There appears to be a lot of special interests who are invested in passing this legislation and I implore you to instead listen to the voices of ordinary residents of the City.

Sincerely,

Dr. Gregory Kinsella

From: [Greg Sachs](#)
To: [Land Use Testimony](#)
Subject: [EXTERNAL] Fwd: IMPORTANT -- Feedback on City of Now Rezoning of Victorian Flatbush -- [REDACTED],
Brooklyn Resident
Date: Wednesday, October 23, 2024 9:15:37 AM

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe. Report suspected phishing emails with the Phish Alert Button or forward them to phish@oti.nyc.gov as an attachment.

Dear City Planning Commission and City Council Members,

As a resident of Prospect Park South in historic Victorian Flatbush, I am writing to express my strong opposition to the City of Yes zoning proposals, particularly the Transit-Oriented Development (TOD) provisions that would dramatically alter the character of our unique neighborhood.

Our community, with its Victorian homes, deep setbacks, and tree-lined streets, represents one of the nation's most significant collections of turn-of-the-century residential architecture. In 1979, Prospect Park South was designated as a Historic District precisely because of its exceptional architectural and historical significance. The proposed TOD upzoning threatens to undermine the very qualities that make our neighborhood special.

Specific concerns about TOD implementation in our area include:

1. Architectural Heritage at Risk
 - The proposed zoning changes would enable development that could dwarf our historic homes
 - New construction would disrupt the intentional garden suburb planning principles that define our neighborhood
 - The distinctive architectural harmony of our streets would be permanently compromised
 - Our only protection is the Landmark Commission and we run the risk that a pro-development mayor like Mayor Adams could appoint an anti-historical commission
2. Infrastructure Crisis
 - Our century-old infrastructure is already stressed beyond capacity
 - Raw sewage regularly backs up into basements during heavy rains due to our overwhelmed combined sewer system
 - Local schools are overcrowded, with some at 150% capacity
 - Power grids aren't built for large multifamily units
 - Subway platforms at Church Avenue and Beverley Road are dangerously overcrowded during rush hour
 - The B/Q lines cannot handle additional ridership without significant upgrades
3. Quality of Life Impact
 - Increased density would eliminate the unique suburban-in-the-city character
 - The proposed changes would reduce green space and tree coverage

- Additional parking demands would overwhelm our residential streets
- 4. Property Value Concerns
 - Many residents have invested significantly in maintaining historic properties
 - Dramatic zoning changes could destabilize property values
 - The unique character that draws buyers to our area would be diminished
- 5. Gentrification and Displacement Effects
 - While our historic district has some protection, surrounding areas will face immense development pressure
 - Long-term residents in nearby Flatbush, East Flatbush, and Ditmas Park would face displacement
 - New luxury development would raise property taxes and rents throughout the area
 - Local small businesses serving existing communities would be priced out
 - The proposed changes would accelerate the displacement of immigrant communities
 - Despite promises of affordable housing, market-rate units would predominate
- 6. Governance and Oversight Concerns
 - The administration is rushing through massive citywide zoning changes without adequate community input
 - The City of Yes process lacks transparency about which developers stand to benefit
 - There are serious questions about oversight and accountability in the planning process
 - The current administration faces multiple investigations that raise concerns about developer influence
 - The city has failed to provide clear data on infrastructure capacity
 - Community Board recommendations are being systematically ignored
 - Environmental review processes are being fast-tracked without proper study

I agree that our city faces serious infrastructure challenges that must be addressed before any significant upzoning. We need:

- A comprehensive infrastructure upgrade plan with dedicated funding
- Modernization of our sewage and water systems
- Significant improvements to subway capacity and reliability
- School capacity expansion
- Power grid upgrades These infrastructure improvements should be completed before considering any density increases.

While I support the city's need to create additional housing, this should not come at the expense of destroying designated historic districts that contribute to New York City's architectural heritage or displacing existing communities. I urge you to:

- Exempt designated historic districts from TOD upzoning
- Maintain current zoning restrictions that protect our neighborhood's character
- Consider alternative locations for density increases that won't compromise historic resources, such as our rezoning plan in 2009 to up zone Coney Island Ave
- Work with preservation groups to identify appropriate areas for development
- Require meaningful percentages of deeply affordable housing in any new development
- Implement strong anti-displacement protections for existing residents

- Prioritize infrastructure improvements before any upzoning
- Institute stronger oversight and transparency measures for zoning changes
- Require detailed disclosure of developer relationships and influences
- Mandate independent infrastructure capacity studies before any upzoning

Our neighborhood demonstrates that preservation and livability are not at odds with urban vitality. Please protect Prospect Park South's unique character by exempting our historic district, and CB14 from the City of Yes TOD provisions.

Sincerely,

Gregory Sachs

, Brooklyn NY, 11218

Public Testimony of the Center for the Study of Brooklyn

October 21, 2024

New York City Council Subcommittee on Zoning and Franchises: City of Yes Zoning for Housing Opportunity

Submitted by Gregory Smithsimon, Director, Center for the Study of Brooklyn, at Brooklyn College, City University of New York

Thank you, Chair Riley and Council Members for the opportunity to testify. I am Gregory Smithsimon, director of the Center for the Study of Brooklyn, and professor of sociology at Brooklyn College and the Graduate Center of the City University of New York. The Center for the Study of Brooklyn conducts research and engages students on issues related to climate change, sustainability, and transit equity in Brooklyn and the city. For the past two years, I have been conducting research on basement flooding in New York as part of a project funded by the US Geological Survey involving researchers across several disciplines and institutions.

The City of Yes is a broad, citywide plan that addresses an urgent need in New York: the crisis in the cost of housing and the need for more housing that meets the diverse needs of New Yorkers. I applaud the efforts of the Mayor, the Department of City Planning, and the City Council to take action on affordable housing. In authorizing more housing in the city, we need to make sure that we are creating housing that is both safe and affordable. I want to make sure that the City Council is aware of deadly hazards present in the part of the current proposal that would legalize basement and cellar apartments.¹ Basement apartments are currently homes for some of New York's most vulnerable residents: low-income New Yorkers, young families, and immigrants. Residents of basement apartments are disproportionately people of color. The City of Yes for Housing Opportunity proposal must ensure that we do not move the most vulnerable New Yorkers into underground apartments in areas likely to experience life-threatening floods. **The proposal must consider inherent hazards in basement and cellar apartments to prevent putting the most vulnerable New Yorkers at risk of deadly flooding.**

High Risk of Flooding and More Drownings in Proposed Basement Apartments

The City of Yes proposal would legalize apartments in basements and cellars that are currently prohibited. The proposal recognizes that living in an apartment below ground level during a flood is a deadly combination, therefore the proposal prohibits basement apartments in *coastal* flood zones. However, when eleven New Yorkers died in basement apartments during Hurricane Ida, none of them lived in coastal flood zones. They died from rain flooding, not coastal flooding.

Basement apartments cannot be allowed in areas at risk for basement flooding. Unfortunately, as seen in **figure 1, the city's own maps show that every council district, every community board, and every zip code has areas that flood from rain.**²

Research has shown it is comparatively easy to predict which *coastal* areas will flood from *ocean* flooding. It is much harder to predict which areas will flood during heavy *rains*, because every storm varies in what direction it comes from, how intense the rain is at its peak, and how long it lasts. Here is the dangerous problem: While the City has maps showing which *streets* are likely to flood from rain, it does not have maps that indicate what *properties* are likely to flood. Under the right mix of conditions, many areas that have never flooded could flood dangerously. **There is presently no way to predict which basement apartments in New York are safe from rain flooding,** and which locations might put residents at deadly risk.

Research by The Center for the Study of Brooklyn shows that residents often experience basement flooding even when there is no street flooding. Even properties on streets designated at low risk of flooding have experienced significant basement flooding. Residents on one block of Crown Heights submitted a petition with dozens of signatures indicating they regularly experience basement flooding, but their block is shown on the city's map to not expect *street* flooding. High elevation does not prevent flooding: our research found that in Brooklyn, for instance, moderate rains have caused basement flooding in some of the highest elevation areas, including Crown Heights, Park Slope, Bedford Stuyvesant, Bushwick, and Grand Army Plaza.

Other Hazards of Basement Apartments Unaddressed in the Current Proposal

While flooding is the most dramatic danger of basement apartments, it is not the only risk.

Asthma and Other Respiratory Diseases. Low-income New Yorkers already suffer epidemic rates of asthma and other respiratory illnesses. The City has found that disproportionate rates of asthma among low-income New York children are caused by exposure to mold, dust, pests, and exhaust fumes.³ These asthma triggers occur at higher levels in basements and cellars.

Even without flooding, cellars are often damp, and in our research almost everyone reported some level of **mold and mildew** in their below-grade spaces.

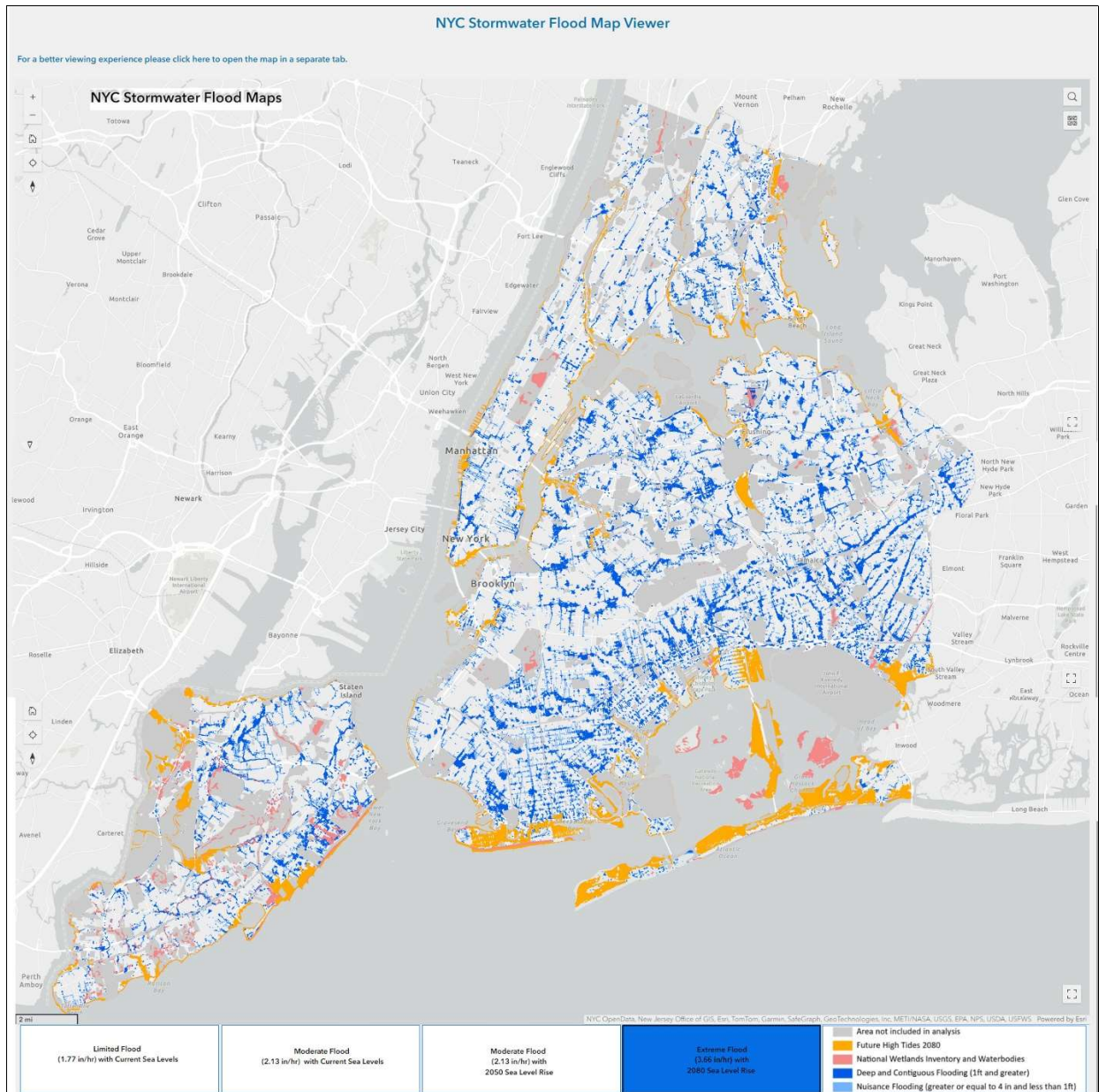


Figure 1: Basements in every district at risk of deadly floods. The City's own Stormwater Flood Map shows that rain falling at a rate comparable to that of Ida in 2080 would flood many blocks in every district. These maps show only street flooding, research shows some buildings' basements flood even when streets themselves do not flood. There are no models to confidently predict which properties will flood in storms. No area of the city can be designated as safe enough from flooding to justify underground apartments.

In New York, boilers and water heaters are most often located on the bottom floor, so that people on that floor inhale both uncombusted natural gas (or fumes from fuel oil in oil-heated homes) and the products of combustion from burning gas. Research finds that natural gas contains particulate matter and over 21 chemicals federally designated as hazardous air pollutants, including chemicals linked to **cancer**.⁴ Legalizing basement apartments would disproportionately move families with children already at elevated risk of asthma into basements on the same floor where hot water and heating systems are emitting chemicals like **natural gas, nitrogen oxide and fine particulates already known to cause asthma**.⁵

Residents report more **roaches, water bugs, and rodents** on the lowest floor than in spaces on the upper floors of their buildings. Mice and cockroaches produce allergens that can increase risks and morbidity of asthma.⁶

Radon gas is a known carcinogen that forms naturally in the ground and leaks into basements. Radon exposure causes 21,000 deaths from lung cancer per year in the US. New York State ranks all five boroughs high for radon levels. Radon levels are higher in basements than other parts of the house because radon first leaks from the ground, through cracks in the foundation, into the basement. Living in basements increases exposure to radon thus increasing the probability of lung cancer. The risk of developing cancer from radon is higher for children.⁷ It is important to note that testing for radon can be mandated, as it was in the East New York pilot program for basement conversions. Radon concentrations can vary over time, however, increasing when cracks form in the foundation and allow radon in, or depending on other environmental changes. Radon levels are naturally higher in the foundation level of a building and dissipate on higher floors.

Cost. Everyone we interviewed who experienced even mild flooding suffered significant financial losses. In a mild flood, people wake up in the dark and try to get out of bed, only to feel their feet landing in inches of water. When that happens, residents have to throw out beds, sofas, and chairs, rip up damaged floors, and seek replacement of moldy drywall and swollen doors. They throw out clothes and shoes. If they are not home, they worry for the safety of their pets trapped in flooding apartments. A building's drainpipe that leads to the city's sewer system is typically accessed through the bottom level of a building. Residents of bottom-floor apartments often reported nuisance flooding from sewer backups, whether during storms that overwhelmed city sewer lines or from blockages in the building's sewer pipe that push water out of the sewer line and into the bottom floor of the building. Legalizing basement apartments so that landlords can legally rent cellars to low-income families virtually insures that hard-working families with little money to spare will be hit with significant costs replacing home necessities that are destroyed by even shallow amounts of water in their homes.

Depression and Mental Health. While our study did not systematically assess mental health, other research has found that living in homes without sufficient natural light leads to a 40 percent increase in depression.⁸ Another study found that living in homes with inadequate light leads to reduced energy, depressed mood, and disrupted circadian rhythms. Those researchers conclude that their research "stresses the importance of designing buildings that optimize daylight for human health and wellbeing."⁹ Inevitably, basement apartments,

particularly cellars, do not have as much light as apartments on other floors. The mental health effects of creating more below-ground housing should not be ignored.

Fire. One reason cellar apartments have long been prohibited is the increased danger of fires in below-grade spaces. Poor ventilation, limited exits, low ceilings that concentrate smoke, and the presence of gas-burning appliances were long believed to make cellars too dangerous to live in. Basement legalization advocates have challenged claims that some features, like low basement heights, actually increase risks to residents. The East New York Basement Apartment Conversion Pilot Program relaxed minimum ceiling height rules and window requirements and addressed fire safety by requiring sprinklers and two exits. Improving the safety of basement spaces with adequate exits and sprinkler systems are important improvements. Fire safety experts note that cellars still present higher risks to firefighters because it is difficult to get water to cellar fires and difficult to vent below-ground spaces.¹⁰ Fire safety is always a consideration for cellars, basements, and any building, but one that was not part of the Center's research on basement flooding. Fire safety has been extensively considered in the development of the East New York pilot program.

No Way for Cellars to Be Safe in Floods

Discussion of legalizing basement apartments has always been accompanied by hopes that they will be made safe. But there is no way to be safe during a flood when an apartment is below ground level and water levels are above ground level. No elements in the proposed zoning changes would make basements less dangerous during flooding. Reports of the deaths of New Yorkers during Ida demonstrate how deadly water can be.

As **Figure 2** demonstrates, living in a cellar apartment during a flash flood is the equivalent of being in an apartment below the bottom of a lake. In a basement in Queens in which two residents drowned during Ida, the foundation wall collapsed and water from the yard, which was flooded to a reported depth of three feet, instantly filled the apartment. According to online maps indicating eligible apartments, this same basement would be eligible for legalization. It is not feasible to make an apartment safe to occupy when it is submerged beneath three feet of water above the level of its ceiling.

Apartments with below-ground-level exits pose particular danger. Police body-cam video shows officers during Ida attempting unsuccessfully to dive beneath floodwaters in a stairwell to get to an exit door.¹¹ The family that lived below drowned. The same night, some victims died when pinned by the pressure of incoming water while trying to exit.

In one case in Queens, a man and woman woke to find water on their floor. They immediately tried to exit, but as they struggled to the door, the water rose above the woman's head to the ceiling. She only survived when her husband pulled her out through the submerged door. Cellar apartments are particularly at risk because, being mostly below grade, any level of surface flooding outdoors is likely to raise the water level above the top of an exit door.¹²

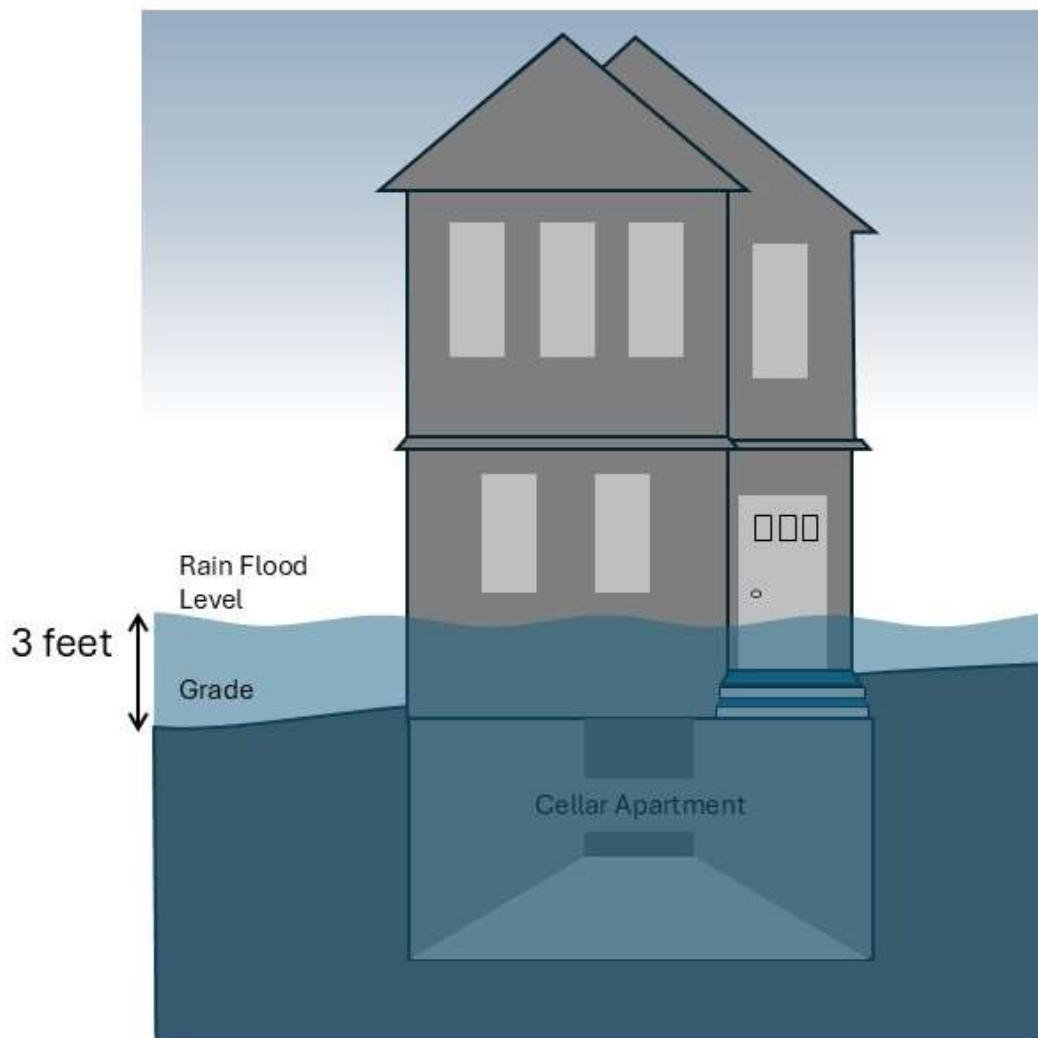


Figure 2: No way out of a below-grade apartment in a flood: Examination of deaths in an apartment in Queens during Ida showed that flooding in the yard meant water had risen over the ceiling elevation of the cellar apartment. The foundation wall collapsed suddenly, inundating the apartment and killing the occupants almost instantly. Witnesses upstairs and family outside did not even know the wall had collapsed, and only realized what was wrong after it was too late.

Risks in Different Types of Below-Grade Apartments

There are several kinds of below-grade levels in a building, each with a different risk profile. New York City defines basements and cellars as two different types of stories: "A basement is a story of a building partly below curb level but with at least one-half of its height above the curb level. A cellar is an enclosed space having more than one-half of its height below curb level. Usually, if a cellar has any windows, the windows are too small for an adult to fit through."¹³

Cellars are the most dangerous candidates for apartments. Because cellars are more than 50% below street level, in any cellar, a 5-foot-tall person's head would be underwater in one foot of flooding at ground level. Water can fill an apartment with incredible speed.

Because cellars are further below ground, exiting typically requires walking up steps. In a flood, water rushing in can make it impossible to climb up steps. When flood waters submerge stairs, it can be impossible for residents to exit or emergency responders to enter.

Regarding risks other than flooding, cellars, compared to basements, also have higher radon levels, are more likely to be damp and moldy, and are more likely to contain gas-fired appliances as well as sewer lines that can backup and flood. Because cellars are farther below ground they have smaller windows and less natural light, increasing the risk of depression and circadian rhythm disruption.

Zoning has long prohibited cellar apartments.

Basements are at least 50 percent above ground level. Risks in basement apartments vary depending on whether the basement is the lowest floor of the building, or whether there is a cellar below the basement (often containing the boiler and water heater).

Ground-Level Basements with no cellar below: Basements that are on the bottom floor of a building and house the boiler and water heater have higher risks of asthma-inducing particulates from exhaust. They can be damp and at risk of mold because their floor is in contact with the ground below. They are at risk of higher radon emissions. Like a cellar, the building sewer line runs through this level, creating the risk of sewer backup and flooding.

Basements Above Cellars: Basements with a cellar level beneath and without boilers and water heaters on the basement level (often in the cellar instead) have lower risks of fuel-related air pollution. Their floors are not in contact with the ground and are less likely to experience groundwater flooding. They can have lower levels of radon in houses with radon leaks than does a cellar level.

So-called "garden apartments" in New York brownstones are technically basement apartments that are often already permitted in 2-unit houses. They may have cellars below. They are one or two feet below grade in front, but often have an at-grade exit in back. Basements with at least one exit at grade may be easier than a cellar to exit in a flood. As in any flooded building, exiting against the pressure of incoming water can be difficult or impossible. Many basements have security gates preventing exit through windows.

Basements (with and without cellars) may not be fully submerged by minor flooding, but are submerged by higher flooding. It seems reasonable that basements are less dangerous than cellars during a flood, but the relative risk of such basement apartments in floods has not been

evaluated in the Center's research and should be understood before the City considers allowing large numbers of new basement (not cellar) apartments.

Types	Risks	Recommendation
Cellars (more than 50% below ground).	<ul style="list-style-type: none"> • High risk of asthma from fossil fuel emissions and mold. • High risk of radon. • Elevated risk of depression. • High risk from flooding. • Extremely difficult to exit during a flood because outside water exceeds exit door height. 	<i>Not safe for housing. Do not permit cellar apartments.</i>
Ground-Level Basements (50% or more above ground) with boilers and water heaters on same level.	<ul style="list-style-type: none"> • High risk of asthma from fossil fuel emissions. • Moderate risk from mold. • Lower risk of depression. • Continued risk from radon. • Continued risk of sewer flooding. • Real but unknown risk from storm flooding. 	<i>Do not permit new apartments due to respiratory risks and potential flood risks.</i>
Basements Above Cellars (50% or more above ground) without boilers, water heaters, or sewer lines, which are located in cellar, and with at least one exit at grade.	<ul style="list-style-type: none"> • Likely lower risk of asthma from exhaust and mold. • Lower risk of radon. • Lower risk of depression. • Real but unknown risk from flooding. 	<i>Study flood risk compared to first floor apartments and consider legalizing those that are not already legal.</i>

Basement Flood Reports to 311

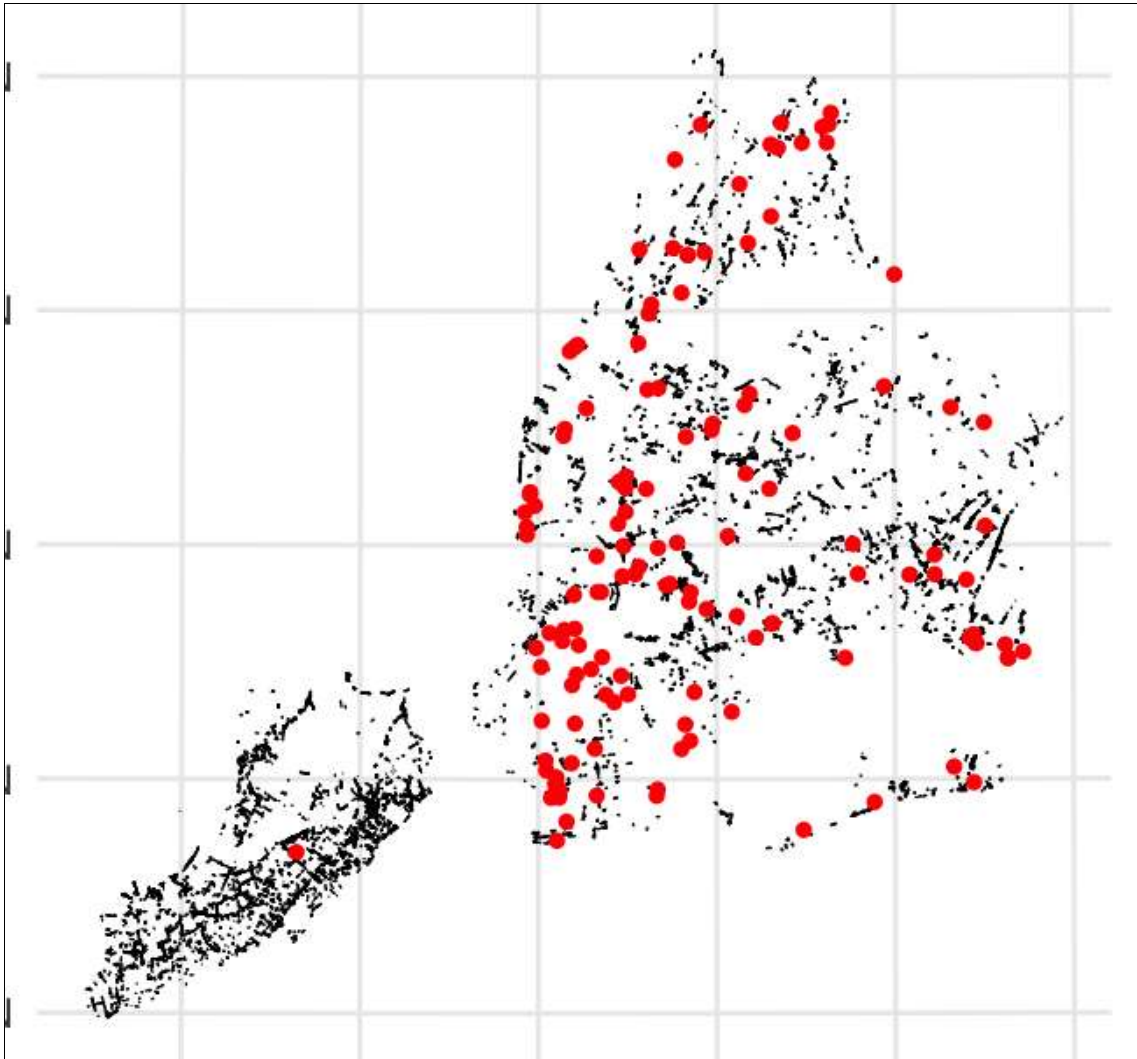


Figure 4: One month of calls to 311 to report basement floods (larger, red dots) shows that basement flooding happens in every part of New York City, not just along the coast. Calls September 29, 2023 to October 10, 2023. Map by Adam Shavit.

Taking Action for Affordability While Keeping the Poorest New Yorkers Safe

Flooding caused by the intensifying rain produced by climate change is a newly recognized threat to homes and residents across the city (Figure 4). Over a decade of advocacy to expand the legalization of basement and cellar units occurred before the deaths during Ida produced shocking evidence of the mortal danger that such flooding now poses. New risks require changing strategies. The ground floors of buildings, which long looked like tempting opportunities for low-cost, if suboptimal, housing, are now known to pose flooding dangers that make them unacceptably unsafe places for New Yorkers to live. In this era, we must build cities that recognize climate reality. The City of Yes for Housing Opportunity program is a historic opportunity to expand the availability of housing in New York City, but it must do so in a way that is safe and responsible.

Fortunately, the City of Yes also provides new opportunities that were not in consideration by the City in the years before Ida. The proposal allowing one accessory dwelling unit (ADU) per home, such as an addition, backyard cottage, or attic conversion provides many homeowners with an alternative to basement conversion that is safer and, given the relatively high cost of retrofitting basements, comparable in cost. With City of Yes, homeowners seeking to create housing will have a safer alternative to cellars and basements.

The current zoning model has been in place for over 60 years. The revisions the City is considering today will likewise regulate housing for decades into the escalating climate crisis. Legalizing more basement apartments would push more New Yorkers into the most dangerous locations just as rain and storms are intensifying.

Jacob Riis shocked New York in 1890 by showing the squalid, sickening conditions in which immigrant New Yorkers lived, including basement apartments. The City enacted zoning to ensure that every home would meet minimum standards of health and safety. We cannot turn our backs on 135 years of housing reform that has kept people out of cellars. Air quality is still poor in basements, and nothing can make people safe in below-grade areas when water rushes in during a rainstorm.

Safe, affordable housing is vital to New Yorkers. Cellar apartments and some other below-grade apartments are not safe. Such apartments may appear politically expedient: while some neighbors object to taller buildings or visibly higher density, burying residents in underground apartments removes people from view, rendering new residents and cheap apartments invisible to people who walk along the street.

Apartments less than halfway underground—at basement level—when the sewer line, furnace, and water heater are in a cellar below, have fewer risks regarding air quality and sewer flooding, but how severe the risks of flooding are will vary property-to-property, and is not currently known.

Cellar and ground-level basement apartments put the most vulnerable New Yorkers at additional risk of respiratory ailments, repeated replacement costs, flooding, and other hazards. **Therefore, while we support the City's commitment to finding opportunities for affordable housing in New York City, we urge the Council to not to permit apartments in cellars or additional ground-level basements.**

Sources

- ¹ In New York City, "A basement is a story of a building partly below curb level but with at least one-half of its height above the curb level. A cellar is an enclosed space having more than one-half of its height below curb level. Usually, if a cellar has any windows, the windows are too small for an adult to fit through." (NYC Housing Preservation and Development, "[Basements and Cellars](#)"). Both cellar and basement apartments are often informally called "basement apartments."
- ² NYC Stormwater Flood Map.
<https://experience.arcgis.com/experience/e83a49daef8a472da4a7e34dc25ac445/?draft=true>
- ³ NYC Health, "Disparities among Children with Asthma in New York City," Epi Data Brief no. 126, September 2021. <https://www.nyc.gov/assets/doh/downloads/pdf/epi/databrief126.pdf>
- ⁴ Drew R. Michanowicz, Archana Dayalu, et al., "Home is Where the Pipeline Ends: Characterization of Volatile Organic Compounds Present in Natural Gas at the Point of the Residential End User" *Environmental Science & Technology* Vol 56/Issue 14, 2022.
<https://pubs.acs.org/doi/10.1021/acs.est.1c08298>
- ⁵ Tanya Lewis, "The Health Risks of Gas Stoves Explained," *Scientific American*, January 19, 2023.
<https://www.scientificamerican.com/article/the-health-risks-of-gas-stoves-explained/>
- ⁶ Sheehan WJ, Rangasithienchai PA, et al., "Pest and Allergen Exposure and Abatement in Inner-City Asthma: A Work Group Report of the American Academy of Allergy, Asthma & Immunology Indoor Allergy/Air Pollution Committee." *Journal of Allergy Clin Immunol.* 2010 Mar; 125(3):575-81.
<https://pmc.ncbi.nlm.nih.gov/articles/PMC2862381/>
- ⁷ CDC, "Who Is at Risk of Radon Exposure?" https://www.atsdr.cdc.gov/csem/radon/who_risk.html
- ⁸ Brown MJ, Jacobs DE. "Residential light and risk for depression and falls: results from the LARES study of eight European cities," *Public Health Rep.* May-Jun 2011;126 Suppl 1(Suppl 1):131-40.
<https://pmc.ncbi.nlm.nih.gov/articles/PMC3072912/>
- ⁹ Nagare R, Woo M, MacNaughton P, Plitnick B, Tinianov B, Figueiro M. "Access to Daylight at Home Improves Circadian Alignment, Sleep, and Mental Health in Healthy Adults: A Crossover Study," *Int J Environ Res Public Health.* 2021 Sep 23;18(19):9980.
<https://pmc.ncbi.nlm.nih.gov/articles/PMC8507741/>
- ¹⁰ Fire Safety Research Institute, "Understanding and Fighting Basement Fires,:" January 1, 2016,
<https://technicalpanels.fsri.org/research-projects/understanding-and-fighting-basement-fires.html>
- ¹¹ Adriana Diaz, "Harrowing Bodycam Footage Shows NYPD Cops Diving Underwater to Try and Rescue Two-Year-Old Boy and His Parents Who Drowned in Their Basement Apartment When Ida Hit New York City," *Daily Mail UK*, September 5, 2021. <https://www.dailymail.co.uk/news/article-9961211/Body-cam-footage-shows-NYPDs-failed-efforts-rescue-drowned-family-three-Queens-apartment.html>
- ¹² Emily Brett, "Home, Interrupted. Rising Floods for Basement Apartment Dwellers, *Feet in 2 Worlds*, April 9, 2024. <https://www.fi2w.org/rising-floods-for-basement-apartment-dwellers/>
- ¹³ NYC Housing Preservation and Development, "[Basements and Cellars](#)."



**Testimony of Habitat for Humanity New York City
and Westchester County**

To the New York City Council

City of Yes for Housing Opportunity Zoning Text Amendment

October 22, 2024

Testimony respectfully submitted by:
Matthew Dunbar
Chief Strategy Officer

My name is Matthew Dunbar, Chief Strategy Officer of Habitat for Humanity New York City and Westchester County. I want to begin by thanking Speaker Adams, Chair Salamanca, Chair Riley, and the entire City Council for the opportunity to testify today and to the Administration for proposing the City of Yes for Housing Opportunity.

I am testifying today to express our strong support for the City of Yes for Housing Opportunity proposal and to urge you to vote in favor of these critical zoning reforms that will allow for the creation of more housing across all of our communities. This proposal builds on the Fair Housing work of Where We Build NYC, the Speaker's Fair Housing Framework, and decades of advocacy to advance a more equitable New York City.

Habitat NYC and Westchester knows the power and importance of affordable housing and homeownership as we've spent the past 40 years building and preserving more than 2,600 homes for low- to moderate-income families in all five boroughs. Affordable homeownership as a critical part of the housing continuum. In order to build an equitable city, it is imperative to invest in solutions that build family and community equity.

With the capital resources and innovative spirit our affordable and market-rate housing sector brings to the table, New York City should be the envy of the nation in how to equitably house our neighbors.

Regrettably, we continue to lag behind many municipalities and regions, including those just across the Hudson River, in building more homes to house our residents. New York City's housing supply and affordability crises have reached a critical point that requires a citywide response. With a historically low vacancy rate, a homeownership rate at a paltry 30% (less than half the national average), and approximately 43 percent of New York City households being rent-burdened, it is clear that our existing housing policies are insufficient to meet the ever-increasing demand.

Additionally, when housing is built, many neighborhoods have opted out of adding new homes in their communities, perpetuating exclusionary housing policies and outcomes. Last year, 10 Community Districts produced as much new housing as the remaining 49 Community Districts combined and the overall pace doesn't come close to the increased demand. This discrepancy is unjust and unsustainable.

The City of Yes for Housing Opportunity is a vital step towards addressing these issues by implementing citywide zoning reforms that will allow for more housing to be built across all neighborhoods.

As a member of the Yes to Housing Coalition, we firmly believe that every neighborhood must help solve the city's affordable housing crisis by allowing a little more housing to be built across all communities.

We all have a responsibility to our fellow New Yorkers and the families who would be a part of our community if provided the opportunity. The City of Yes updates our collective toolbox of strategies to help meet current needs and advance equity-building by enabling the construction of more housing appropriate to each community.

We at Habitat particularly want to emphasize strategies that will support homeowners and enable more homeownership opportunities to be created across communities, including:

- **Permitting accessory dwelling units (ADUs)**, allowing homeowners to earn rental income and provide more space for multigenerational families and Give homeowners additional flexibility to adapt their homes to meet their families' needs
- **Implementing a Universal Affordability Preference** to allow buildings to add at least 20% more housing if the additional homes are permanently affordable.
- Enabling and supporting “missing middle” housing conducive to condo and cooperative development through **Town Center Zoning and Transit-Oriented Development** - allowing ground floor commercial with two to four stories of housing above and modest, three-to-five story apartment buildings along transit rich corridors
- **Eliminating Parking Minimums** for new buildings that make homebuilding more costly and increases rents and purchase prices
- **Enabling Faith-based and Campus Infill** development to make it easier to add new housing on underutilized or repurposed community properties
- **Addressing technical fixes to MIH** that reconcile affordable homeownership projects under Open Door – allowing for the approval of developments such as Habitat’s Claremont House Cooperatives to be built with 60%more housing units

Time and again, our leaders speak of building a more equitable and affordable New York...the City of Yes for Housing Opportunity is a big step in laying the foundation for this more equitable city. We must build more housing if we want a more inclusive and just city, so I urge you to support the proposal with very minimal changes and vote in favor of all neighborhoods stepping up to meet the collective need.

Thank you for the opportunity to testify today. We look forward to continuing our partnership with the City in serving low-income families in need of affordable homeownership

[EXTERNAL] In support of lifting parking requirements

Hale McSharry <

Tue 10/22/2024 10:29 PM

To: Land Use Testimony <landusetestimony@council.nyc.gov>;

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To the City Council:

I am a New Yorker who supports lifting parking requirements to free our city from the whims of the auto and gas industries and enable our communities to expand healthily. I am appalled by CM Paladino's rhetoric at today's hearing. We must get rid of these onerous parking requirements and build a City of Yes.

Sincerely,

Hale McSharry



Brooklyn

From: [Harlan Erskine](#)
To: [Land Use Testimony](#)
Subject: [EXTERNAL] Submit testimony
Date: Wednesday, October 23, 2024 12:37:34 AM

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I live in Brooklyn and fully support lifting parking mandates.

harlan erskine



From: [Harriet Barry](#)
To: [Land Use Testimony](#)
Subject: [EXTERNAL] City of Yes
Date: Friday, October 25, 2024 10:11:21 AM

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I am and have been a resident of Ditmas Park (Victorian Flatbush) for 56 years. I am writing in opposition to the Housing Opportunities parts of City of Yes (COY) specifically Transit Oriented Development, District Fixes, and Accessory Dwelling Units.

-- Harriet R. Barry

Fine Art & The Alexander Technique

[REDACTED] ell



[EXTERNAL] Please read

Hatia <[REDACTED]>

Wed 10/23/2024 3:35 PM

To: Land Use Testimony <landusetestimony@council.nyc.gov>;

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To Whom it May Concern:

The City of Yes plan, a 1 glove fits all agenda, is a poor fit for our community. This proposal will put additional burden on already overwhelmed infrastructure in flood prone areas. Place stress on already overcrowded and many underperforming schools. In most situations increased population and density will jeopardize public safety. Our police force, fire department, EMS, health and human services cannot withstand additional work loads. This aggressive plan will remove parking mandates for new development projects. Our car-centric, low density R 1 - R 5 neighborhoods are already parking deprived. A housing crisis is the alleged reason for this over reaching plan. However, allowance of tens of thousands of new entrants to our city while there is a crisis is akin to strategically placing additional holes in a sinking ship. New York City cannot maintain their sidewalks Over 9,000 sidewalks damaged by tree roots await repair. The repair wait list exceeds 5 years. New York City please fix what you have before adding more. Go back to the drawing board and do a district by district assessment. Determine which fingers properly fit the gloves and bring a modified product back to the respective council members and their constituents for approval. Force feeding creates a gag reflex. This plan in its current state is not digestible for many New Yorkers. Thank you in advance for your anticipated cooperation.

Hatia Osmanovic



Bronx NY 10461

Sent from my iPhone

[EXTERNAL] Yes on City of Yes!

Helmut Carter <>

Wed 10/23/2024 10:57 AM

Inbox

To: Land Use Testimony <landusetestimony@council.nyc.gov>;

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I support City of Yes: Housing Opportunity and more importantly, lifting Parking Mandates.

Thank you

From: sternhenri@gmail.com on behalf of [Henri S](#)
To: [Land Use Testimony](#)
Subject: [EXTERNAL] Please vote for City of Yes in full
Date: Thursday, October 24, 2024 3:42:43 PM

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe. Report suspected phishing emails with the Phish Alert Button or forward them to phish@oti.nyc.gov as an attachment.

Hi There,

My name is Henri Stern, I am a parent of 2 and the owner of a single family home in Cobble Hill Brooklyn. I wanted to email you to voice my support for City of Yes in full.

The status quo in zoning has given us the unaffordable housing problems we have today. We need bold solutions to the affordability crisis. I work with dozens of colleagues who are forced to consider to leave to New York given how untenable their living situation is.

Let's not be afraid to see New York change, especially since so much of what City of Yes does is bring solutions New York should rally around: shared and small housing, town center zoning...

The infrastructure and transit needs highlighted by many should be addressed but holding City of Yes hostage is not a solution. We need movement in order for things to progress in this city.

Thank you,

Henri Stern

[EXTERNAL] Eliminate parking mandates

Henry Dowling <[REDACTED]>

Tue 10/22/2024 10:41 PM

To: Land Use Testimony <landusetestimony@council.nyc.gov>;

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Hi,

I'm writing in support of eliminating parking mandates as part of the "City of Yes" initiative. New York City desperately needs this kind of change to allow more housing to be built, along with reducing unnecessary construction costs, encouraging public transit use, and working towards a cleaner, more sustainable city.

It's a simple way to expand housing options and quality of life for all New Yorkers, and we have a unique opportunity to make New York City a model for sustainable urban development in the States.

Thank you for considering my feedback.

Henry Dowling



THE ADVOCATE FOR NEW YORK CITY'S HISTORIC NEIGHBORHOODS

City of Yes for Housing Opportunity Comments July 2024

Contact: Frampton Tolbert, Executive Director
[REDACTED]

The Historic Districts Council appreciates the opportunity to provide in-depth comment on the Department of City Planning's proposed zoning text amendments related to City of Yes for Housing Opportunity (COYHO). HDC appreciates that the City is interested in looking for new, novel, and expanded ways to provide more housing for New Yorkers across the city.

COYHO will be the most impactful of all three City of Yes proposals on New York's historic neighborhoods and historic districts. While HDC supports some specific pieces of the proposal, we have serious concerns that COYHO does not require any affordable housing, which the city sorely needs. We fear that COYHO proposals will create a glut of market-rate and luxury housing while also devastating the city's historic affordable housing stock, by incentivising the demolition of historic neighborhoods, and the replacement of existing affordable and rent regulated housing with denser, and less affordable housing.

First, some things we support:

Historic housing typologies. HDC appreciates that COYHO would re-legalize the creation of shared housing like the Barbizon Hotel, and supportive housing types like Single Room Occupancy. We also endorse COYHO's premise of "Town Center Zoning," where contextual infill could be built above single story commercial buildings in neighborhoods with a central business street.

We would consider this appropriate as long as it does not incentivize the loss of designated commercial structures or encroach upon historic residential neighborhoods beyond the commercial core. We support these historic typologies because they largely already exist in neighborhoods.

Commercial to Residential Conversions. HDC strongly supports commercial to residential conversion, and is broadly supportive of adaptive reuse across the city. We are advocates for additional incentives that will help convert historic commercial buildings into residential units. Many historic commercial buildings are already overbuilt in terms of FAR. We strongly support provisions in COYHO that expand the age, type and location of buildings which are eligible for conversion, and we support COYHO's proposals to expand the housing typologies those conversions can provide, including dorms or shared housing.

Incentivising conversion is also in full accordance with DCP's City of Yes for Carbon Neutrality goals: [New building construction and operation is the single largest source of greenhouse gas emission](#), but [conversion is less than half as carbon intensive as new construction, and commercial-to-residential conversion can increase a building's energy efficiency up to eighty per cent](#). Aligning COYHO with financial incentives such as historic tax credits will allow property owners to maximize funding sources to convert and restore these buildings.

Second, some things we support with caveats and concerns:

Accessory Dwelling Units (ADUs). HDC does not oppose the idea of ADUs but requests confirmation from the NYC Landmarks Preservation Commission that LPC will have jurisdiction over ADU design and placement within existing historic districts and on individual landmark sites. Further, we worry that ADUs could hamper efforts to designate historic districts in the future, and we seek confirmation from the Commission that it will not use the presence of new ADUs in currently-undesigned neighborhoods to deny or disregard those same neighborhoods should they seek historic district status in the future.

In all cases, and especially in cases of rear-yard and basement ADUs, HDC urges DCP to ensure that these dwellings are governed by regulations for light and air, which are essential for any housing.

In areas where the historic row house core exists, HDC would be cautious about supporting ADUs, even in cases of direct street access on the lot, if the ADUs impeded upon open space within the core, which is a key feature of many landmark designated blocks.

Transferable Development Rights (TDRs). HDC supports new and additional financial incentives for historic preservation. We support the expansion of Transferable Development Rights (TDRs) for individual landmarks. We believe the ability to transfer unused development rights further afield will provide new sources of revenue to some individual landmarks, such as struggling religious congregations. However, we believe DCP has incorrectly mapped its proposed expanded TDR radius. We believe DCP's TDR map should show the entire surrounding area where TDRs could potentially be transferred. We are concerned that through zoning lot mergers, TDRs could be transferred even further than the existing DCP TDR proposal details. We are not necessarily against this larger TDR radius, but request that it be more accurately explained.

In addition, HDC does not support removing this process from public input. DCP proposes that in TDR cases where a bulk waiver is needed, the project would go to the Community Board and then City Planning for certification. But, where there is no need for a waiver, the project would only come before City Planning. We believe that all TDRs should come to the community board, and ideally to the City Council, for consideration and public input. While this may slow down the timeline, we believe this is a necessary part of the process.

Impact on Special Districts. We understand that Special Districts will remain in the new zoning code, but we are concerned that many of these rules are being streamlined, in favor of uniform zoning, which puts Special Districts at risk of losing their character. For example, places like Parkchester, which was built as a planned

community with intentionally designed open space for residents, could be dramatically altered with infill under the new rules. Sometimes, these new rules may run counter to the stated goals of City of Yes for Housing Opportunity. For example, we are particularly concerned that in the Hudson Square Special District, new rules will incentivize demolition of existing buildings containing rent regulated housing.

Campus Infill. Relatedly, we are concerned that provisions for campus infill included in COYHO, including provisions that exempt such infill from rear-yard requirements, could have negative impacts on quality of life at NYCHA campuses. While we are not opposed in principle to infill on NYCHA campuses, because we know that tower-in-the-park construction has, in several cases, cut NYCHA residents off from commerce and services that all New Yorkers should have access to, but we fear that market-rate and luxury infill on NYCHA campuses will deprive NYCHA residents of light air and greenery without offering anything in return. We believe that any new housing built on public land MUST be 100% affordable.

Beyond mandating 100% affordability on NYCHA campus infill, we urge DCP to be thoughtful about the kinds of infill projects it approves on NYCHA campuses, and include and prioritize the needs of and voices of NYCHA residents in all campus infill discussions.

Things that HDC opposes:

Lack of Affordable Housing. While not fully in HDC's purview, the organization strongly objects to the fact that COYHO does not require the creation or retention of any units of new or existing affordable housing. The proposed text amendments offer only optional incentives for new affordable units through additional FAR bonuses. In the face of an affordable housing crisis, optional is not good enough.

HDC believes that without affordable housing mandates, COYHO will lead to extensive new market rate and luxury housing, but little or no affordable housing. Especially now that the FAR cap has been lifted, there are many ways for developers and property owners to maximize their FAR without including affordable housing. We do not believe that potential additional FAR will be sufficiently compelling under these circumstances to create the necessary volume of affordable housing the city needs. Instead, The city MUST put in place a plan that requires affordable housing, even by providing additional incentives. Luxury housing will not help solve the housing crisis and will only lead to the loss of more affordable units.

Lack of Public Participation. HDC remains seriously concerned about how COYHO's effort to streamline rules and regulations related to housing will remove these projects from public oversight at the municipal and residential levels. For example, if these projects are allowed to bypass the Uniform Land Use Review Process (ULURP), as COYHO proposes, input from council members, community boards, and the general public will be eliminated in many cases. Additionally, expert municipal agencies such as the Board of Standards and Appeals, and the NYC Landmarks Preservation Commission will either lose their expert role in these cases, or feel pressure for their decisions to conform to the priorities set by COYHO.

Items not addressed by COYHO:

“Bigfooting.” Related to the issue of optional affordable housing is the issue of “bigfooting,” a term coined by planning expert George Janes, to describe the trend of demolishing smaller buildings with rent regulated housing for much larger buildings with fewer units, all generally luxury. COYHO does not address this phenomenon, and HDC fears that we will continue to lose affordable housing this way unless there are specific policies in place to prevent it.

Unit and Building Combination and Warehousing. Speaking of losing affordable housing units, HDC is very concerned that COYHO does not address several ways in which the city is losing existing affordable housing, including through the combination of units, the conversion of buildings from multi-family to single family occupancy, and the warehousing of affordable units by building owners. It is unclear to us why DCP does not consider these losses to be significant enough for COYHO to acknowledge or address. HDC believes that any policy concerned with “Housing Opportunity” MUST address these issues. New Yorkers who are losing their homes to unit combination and warehousing need the power of city government to stop these trends in their tracks.

Restored Housing. Relatedly, the city has the opportunity to incentivize the restoration and retention of underutilized and abandoned units in every borough. The expansion of programs such as the Unlocking Doors Pilot, which uses municipal funds to renovate distressed rent-stabilized homes and connect those units to New Yorkers in need, offers an opportunity to invest in, safeguard and champion New York’s affordable housing stock. Given DCP’s carbon goals, incentivising the retention of these units safeguards their embodied carbon and their existing affordability.

Preservation as a tool for the retention of historic affordable housing units. [HDC’s 2016 report on affordable housing and historic districts](#) demonstrated that rent subsidized units remain within historic districts at a higher rate than outside them. Therefore, New York City is at risk of losing much of its low-rise rent regulated historic affordable housing stock simply because it is not yet designated. We urge DCP to include historic preservation as a tool for Housing Opportunity.



HOMELESS SERVICES UNITED

307 W. 38TH STREET, 4TH FLOOR
NEW YORK, NY 10018
T 212-367-1589
www.HSUnited.org

**Homeless Services United's Written Testimony Submitted to
The City Council Subcommittee on Zoning and Franchises Public Hearing on Oct. 22nd, 2024
on the City of Yes Housing Opportunity**

My name is Kristin Miller, and I am the Executive Director of Homeless Services United. Homeless Services United (HSU) is a coalition representing mission-driven, homeless service providers in New York City. HSU advocates for expansion of affordable housing and prevention services and for immediate access to safe, decent, emergency and transitional housing, outreach and drop-in services for homeless New Yorkers. Thank you to Speaker Adams and Chair Riley and Members of the City Council for holding this public hearing on NYC's City of Yes housing proposal.

The main driver of homelessness is the inability to afford housing, and HSU fully endorses the City of Yes Housing Plan which will eliminate zoning barriers and unlock the ability to create more units of affordable housing throughout the five boroughs.

Our city's housing is gripped by an affordability crisis, as nearly 600,000 households spend more than half of their income on rent, while more than 145,000 people slept in NYC's shelters on a single night in December 2023. The City's vacancy rate for housing is the lowest it's been since 1968¹, leaving fewer and fewer housing options for low-income renters and people experiencing homelessness.

HSU is grateful to the Council for the addition of \$2 billion in NYC's FY25 Adopted Budget for the preservation and creation of affordable housing over the next two years and over \$540M baselined in next year's budget for CityFHEPS vouchers. To maximize the housing opportunities which these critical investments can provide for New Yorkers, we urge the Council to support the City of Yes. Through this plan, the City can update its outdated zoning rules to meet New Yorkers' current housing needs, more equitably develop housing across the City, and build more housing of every type. All neighborhoods must participate in this plan, both high and low-density to ensure the plan can effectively promote housing creation Citywide.

For low and extremely low-income households as well as people at-risk or currently experiencing homelessness, rental assistance vouchers and eviction prevention services are critical tools to accessing and maintaining stable housing, but rehousing efforts are bottlenecked if there is not sufficient housing capacity. Since 2021, NYC grew by 275,000 households while only adding 60,000 units of housing. The City of Yes will help to address this lag and is projected to support the creation of 150,000 new units of housing across every NYC neighborhood over the next 15 years.

Recognizing that the scope of City of Yes proposes long-term improvements and updates to the City Zoning Code to reduce housing development barriers, **HSU strongly encourages the Administration to prioritize resources to facilitate more robust creation of affordable housing for very-low (31-50% Area Median Income (AMI)) and extremely low-income (0-30% AMI) households and ensures that households experiencing or at-risk of homelessness can access those units to avoid or shorten their time spent homeless.** It is crucial that affordable housing is indeed affordable for even the lower-income

¹ <https://www.nyc.gov/assets/hpd/downloads/pdfs/about/2023-nychvs-selected-initial-findings.pdf> pg. 28.

New Yorkers. In 2022, nearly 8 in 10 rent-burdened households made less than 50% AMI². And while 54.6% of rent-burdened households earned less than 30% AMI, only 15.4% of the affordable housing produced under the previous Administration was targeted to under 30% AMI.³ Enabling production of additional units of deeply affordable housing will reduce rates of rent-burdened New Yorkers, allowing more low-income households to become financially stable and thrive within their communities.

City of Yes is critical to enabling the creation of additional housing, but more actions should also be taken to address the housing crisis in New York City.

- **HSU stands with Speaker Adams and the City Council in urging the administration to fully implement the CityFHEPS Local Laws 99-102 of 2023 immediately.** These laws when fully implemented will allow more New Yorkers at risk of entering shelter to instead find permanent housing and more people experiencing homelessness a pathway out of shelter and into a home of their own.
- **Increase HRA funding for Homebase programs by \$37.9M to a total of \$100M.** Homebase eviction prevention programs have been effectively flat funded since prior to the pandemic, while the need for housing assistance continues to grow. Without accompanying funding to match the new post-Covid reality, Homebase services are severely oversubscribed, with actual caseloads over triple their contracted amounts, staff turnover averaging over 50% across sites, and wait times for appointments stretching weeks or months out.
- **HRA must improve access to public benefits, ongoing cash assistance, one-shot deals, and CityFHEPS application processing.** Eviction prevention and shelter providers recount numerous delays with accessing public benefits and rental assistance which hinders their clients' ability to attain rental assistance and move into permanent housing.
- **Release an RFP to Submit CityFHEPS In-Community Applications separate from Homebase.** Homebase prioritizes cases which are at most imminent risk of eviction given their finite capacity. By creating a separate program with dedicated staff lines to assist less urgent cases to stabilize their housing through CityFHEPS, tenants will more effectively be able to stabilize their housing further upstream.
- **Expand Access to Aftercare Services within the Community.** The City and State should continue to look for ways to support and expand in-community aftercare programs, such as the Solutions To End Homelessness Program (STEHP) as well as settlement house models which holistically support the needs of families and individuals.

HSU encourages the City Council to support the City of Yes, and HSU and our members stand ready to continue to work with the Administration on ensuring that all New Yorkers are able to find a place they can call home. Thank you for the opportunity to testify.

If you have any questions, please contact me at kmiller@hsunited.org

² <https://anhd.org/report/new-york-citys-ami-problem-and-housing-we-actually-need>

³ <https://cssny.org/news/entry/de-blasio-housing-legacy>

[EXTERNAL] City of Yes feedback

Howard Wallick <[REDACTED]>

Fri 10/25/2024 9:52 AM

To: Land Use Testimony <landusetestimony@council.nyc.gov>;

Cc: jasnycesq@aol.com <jasnycesq@aol.com>; roisinford@gmail.com <roisinford@gmail.com>;

Importance: High

 1 attachments (3 MB)

Written Testimony by Joel A. Siegel, Esq., in Opposition to City of Yes.pdf.crdownload;

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I am a resident of Ditmas Park West (and have been since 1983). I fully support Joel Siegel's attached letter in opposition to City of Yes.

Incidentally, I am an affordable housing developer and owner (outside New York City) and can assure you that the current plan will *not* help produce more affordable housing in New York City.

Thank you,

Howard Wallick

[REDACTED]
Brooklyn, NY 11226

Howard Wallick | Board Member & Senior Advisor

p: [REDACTED]



Opening doors to homes, opportunities and hope.

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From: [Howard Wallick](#)
To: [Land Use Testimony](#)
Cc: [REDACTED]
Subject: [EXTERNAL] City of Yes feedback
Date: Friday, October 25, 2024 9:52:37 AM
Attachments: [image001.png](#)
[image002.png](#)
[Written Testimony by Joel A. Siegel, Esq., in Opposition to City of Yes.pdf.crdownload](#)
Importance: High

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Incidentally, I am an affordable housing developer and owner (outside New York City) and can assure you that the current plan will *not* help produce more affordable housing in New York City.

Thank you,

Howard Wallick

[REDACTED]

Brooklyn, NY 11226

Howard Wallick | Board Member &
Senior Advisor



P: [REDACTED]

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JOEL A. SIEGEL
ATTORNEY-AT-LAW

October 24, 2024

By Email

Subcommittee on Zoning
New York City Council
City Hall Park
New York, New York 10007

RE: OPPOSITION TO CITY OF YES "HOUSING OPPORTUNITIES"

Dear Council Members:

I am a resident of Victorian Flatbush in Brooklyn, and have been practicing law in New York for almost 40 years, including a wide variety of real estate matters. I write in opposition to the Housing Opportunities components of City of Yes ("COY"), specifically Transit Oriented Development, District Fixes, and Accessory Dwelling Units. I note that while I am a member of Community Board 14 ("CB14") in Brooklyn, I write now on my own behalf.

In support of my opposition, I have included herewith:

1. My opinion piece on Housing Opportunities;
2. My letter to the Department of City Planning ("DCP"), dated July 2, 2024; and,
3. Photographs (before and after) of a Victorian Flatbush corner, illustrating the inevitable result of some of the most objectionable aspects of Transit Oriented Development.

There is one overriding point I want to make to you and your fellow Council Members copied with this letter. There is absolutely no need to rush to judgment on this massive overhaul of the 60-year old Zoning Resolution. There is no need to cram COY down the throats of the people you serve.¹ Other than the developers (with their lobbyists) licking their lips in anticipation of an enormous windfall, there is nothing that prevents you from putting the brakes on the objectionable components of COY, and directing DCP to engage in meaningful community engagement to reach a consensus for more housing. The unnecessarily draconian and

¹ While in his testimony to you, Brooklyn Borough President Antonio Reynoso expressed support for COY, he unambiguously indicated he supported COY because it was expedient, and he specifically used the word "cram" when characterizing how COY is being pushed through the City Council. Simply, that is no way to enact a zoning plan that may last decades.

misguided aspects of COY are readily apparent (and shown below), and you heard testimony from lawmakers and NYC residents to this effect on October 21-22. COY is as contentious a piece of legislation as you will meet, and DCP did little to prevent the matter from coming to the boil you now face. DCP wants you to clean up their mess. I ask you to resist the pressure to gratuitously inflict harm on NYC homeowners, and to instead do the right thing. Send Housing Opportunities back to DCP, and compel them to work with communities for a plan that most everyone can support. Make DCP do the hard work they have so clearly failed to do.

2009 Flatbush Rezoning

Over the course of more than three years, members of the Victorian Flatbush community participated in the 2009 Flatbush Rezoning ("2009FR"). The 2009FR was a long-term plan resulting from meaningful engagement by all sectors of our community (including CB14). As a result, residential streets in Victorian Flatbush were preserved by rezoning to R3X, and our commercial corridors were upzoned, leading to the current unprecedented boom in building of dwelling units along our commercial streets. The 2009FR was the product of people of good will coming together to meet the challenge for more housing. It entailed a lot of hard work by many (including DCP) and compromise by all, in order to create more housing. As you know, DCP Chairman Daniel Garodnick has recently and repeatedly criticized various neighborhoods for a lack of new dwelling units. But he has not and cannot criticize the people of Victorian Flatbush or the other neighborhoods who, long before COY, took it upon themselves to work for more housing. Since the 2009FR was enacted, several thousand dwelling units have been added in Victorian Flatbush, and several thousand more are headed to completion.

Unfortunately, various Housing Opportunity provisions fundamentally undermine the work the residents of Victorian Flatbush did with DCP for the 2009FR. Up until now, Victorian Flatbush residents reasonably relied that the 2009FR was permanent. COY is a kick in the teeth. It is a betrayal, and it sends a clear message to Victorian Flatbush that DCP cannot be trusted. Specifically, if enacted, the Transit Oriented Development, District Fixes and Accessory Dwelling Units provisions of COY would spell the end of large swaths of Victorian Flatbush, an area that has been preserved by my neighbors and their predecessors for over 120 years. Beautiful homes protected by the 2009FR would be torn down for luxury apartment buildings because COY takes a sledgehammer one-size-fits-all approach, without any concern for our neighborhood and other neighborhoods throughout NYC. You should be profoundly offended that DCP has asked you to endorse their betrayal of our community. And you should just say NO.

There is no reason why every neighborhood throughout NYC cannot do what we did, or at least be afforded the opportunity to do so, and no reason why DCP should not be compelled to work with every neighborhood to achieve what we did. DCP needs to be told in no uncertain terms that they must do this. They must be told that they must try to build consensus. And if you fail to force them to do this, you will have failed in your responsibility to NYC residents to do what is just, moral and fair.

In my accompanying opinion piece, I point out that tens of thousands of NYC homeowners will lose a billion dollars in equity under Housing Opportunities, and that these homeowners' nest eggs -- life savings -- will effectively and cavalierly be given over to developers. This is a

staggering and breathtaking fact. These homeowners, like me, worked decades for their equity. Is this what it now means to be politically "progressive"? To me, it shows a profound lack of conscience. It should to you as well.


As you well know, if you want more "affordable" housing, you need to build more and better maintained NYCHA housing, Mitchell-Lama housing, and Nehemiah projects. It is unconscionable to try to cure NYC's housing problems on the backs of arbitrarily selected homeowners, which is what COY does.

There is no need for me to repeat the articulate testimony of others who came before you this week in opposition to COY, nor to repeat the matters included in the documents accompanying this opposition. Further, others in my community have submitted to you written testimony detailing and analyzing the technical zoning provisions of Housing Opportunities, to help you better understand the inherent problems in DCP's fundamentally flawed plan. But I want to highlight a few further points:

- 1) As many testified before you this week, there was minimal thought given to environmental and infrastructure impacts of COY, including sewage and drainage. In this regard, and at best, Housing Opportunities is a crapshoot.
- 2) As you know, many Council Members are former members of community boards. COY effectively ends community board influence on land use matters. Everything becomes as of right for developers. There can be no question this is wholly inappropriate. And the fact that the vast majority of community boards have voted against COY cannot and should not be ignored.
- 3) Many people testified to you, particularly young people, that they want rents to go down. But as you well know, the principal of supply and demand from Economics 101 does not apply in New York City for a myriad of reasons. One of those reasons is the fact that developers do not build to lower rents. They really don't. They build to make as much money as possible. Further, Housing Opportunities contains minimal incentive for "affordable" housing. The bottom line is rents are not going down. They never have and they won't under COY.

Please, please, step back from the brink. Do the right thing. Have a conscience. Find your backbone. Tell DCP to follow the blueprint they followed with the 2009FR. Work with communities. Reject Housing Opportunities.

Thank you.

Sincerely,

Joel A. Siegel

cc: All NYC Council Members (*by email*)

**OPINION PIECE BY JOEL A. SIEGEL, ESQ., ON
HOUSING OPPORTUNITIES UNDER CITY OF YES**

CITY OF YES! (FOR DEVELOPERS)

by Joel A. Siegel

A flyer from the City of New York arrives in the mail. It's not about recycling, composting, disaster preparedness, or voting. The flyer announces:

**NYC Needs More Housing!
So The City Will Be Transferring Equity From Your Home To A Developer
To Replace The Two-Story House Next To Your Two-Story House
With A Three to Five Story Apartment Building**

Crazy, right? But that is in fact what is proposed by the New York City Department of City Planning (DCP). And the DCP is doing its level best to hide this from homeowners, to give City Council members cover to vote (in the Fall) in favor of the City of Yes...for developers. Not surprisingly, DCP did not send around any flyers announcing its intentions. This Op-Ed is your flyer. Read on.

The City of Yes (COY) is a massive overhaul (called a "text amendment") to NYC zoning rules, which are collectively called the NYC Zoning Resolution. The many elements of COY are packaged in three buckets, two of which – "Carbon Neutrality" and "Economic Opportunity" – have already been passed by the City Council. It is the third bucket, "Housing Opportunity," consisting of 15 elements, that contains three profoundly misguided proposals, which promise to take away a billion dollars in homeowners' equity in order to hand it over to developers, no questions asked. I'm talking about the nest eggs of tens of thousands of City residents. Lifetime savings.

This third bucket contains provisions that have wide support, such as permitting the retrofitting of office buildings for housing. But that's part of the deception. If you package enough good things together for Council members to vote for, maybe they'll overlook the bad things. But make no mistake, the mantra is: "The City needs more housing, and we don't care who gets hurt. And, if we help our friends the developers, so much the better. Maybe they'll even contribute to our election coffers." Particularly galling are so-called "progressives" all in for COY, now best friends forever with developers, and gleefully putting targets on the backs of 1 & 2 family homeowners. Of which I am one, I am a single-family homeowner, having worked all my adult life to have a beautiful home in one of the Victorian Flatbush neighborhoods of Brooklyn, often referred to collectively as Ditmas Park.

There are approximately 691,000 1 & 2 family homes in NYC (the vast majority outside Manhattan), and homeowners like me are now branded as the obstacles and enemies of more (and affordable) housing. No one gave me my home, no one paid my mortgage, taxes or insurance, and no one repairs and maintains my home but me. By branding homeowners as "privileged," the Mayor and the DCP seem to believe that they can take away what's mine and give it to a developer. They're hoping there are enough people who don't care about outer borough homeowners, or won't bother to think through what's being proposed, or simply don't have a conscience. And this is all a cover for the City and State's lack of political will to

maintain and build more and better NYCHA and Mitchell-Lama housing; to prevent and punish the stockpiling of rent-regulated apartments; and to tax the tens of thousands of absentee coop/condo apartment owners, etc. Those ideas are too difficult to handle. It's simply easier to take from others like me.

The name housing opportunity itself is a deception. How can you be against housing opportunities? It's like being against mother's milk. The proposal doesn't provide housing opportunities. It provides development opportunities for outside investors. There are three particularly onerous elements: (1) Transit Oriented Development; (2) District Fixes; and, (3) Accessory Dwelling Units. They're all misnamed.

Transit Oriented Development (TOD) is not transit oriented at all. It simply uses proximity to a subway or rail station (up to half a mile away) as a cover for eliminating zoning controls in portions of low-density zoning districts without going through zoning map changes that would require community board review. Under TOD, streets within one-half mile of a subway station that no rational person would consider as being wide (including one-way streets) are defined as "wide." And in areas now zoned for 1 & 2 family homes ("low density"), any property on a 5,000 square foot lot that's on a "wide" street could be torn down for an apartment building up to five stories. A developer could also buy up houses adjacent to the corner property and build an even larger building. All of this building would be "as of right" under TOD. No questions asked. Developers would be free from Community Board review, losing much of their influence on development. These as of right apartment buildings promise to destroy the design, aesthetics, and character of hundreds of beautiful, strong, thriving neighborhoods in NYC.

Think about the homeowners whose properties are no longer adjacent to a 1 or 2 family house, but instead a brick wall along the adjacent lot line. Think about the reasonable expectations of those homeowners when they invested in and contributed over decades to neighborhoods throughout NYC. TOD pulls the rug out from under them. The moment COY is law, these homeowners' properties would instantly lose significant value. The homes surrounding the new buildings would easily drop in value anywhere from \$100,000 to \$350,000. And if you multiply that by the thousands of affected homes, you're easily talking about a billion dollars (e.g., 10,000 homes x \$100,000). And where does that value go? You got it. It goes directly to the developers who can build adjacent apartment buildings.

Again, as cover for this transfer of wealth, the COY proponents are also selling a charade. They maintain that if developers build these apartment buildings, there will be more housing, and therefore rents will go down. The COY proponents know that this naive and simplistic notion is patently false, and they know this based on NYC history. Rent in NYC is not based simply on supply and demand from Economics 101. Many factors enter into the equation, including, as noted above, the withholding of rent regulated apartments from the market, the purchase of apartments as investments (and not to rent), and short-term rentals. But the critical fallacy in the COY rationale is shown by the fact that developers do not build to lower rents (they really don't), they build only when market forces are in place to maximize returns on investments. In other words, the developer who would build an apartment building on a corner in Victorian Flatbush will only build to sell or rent at a high market rate. No rents go down, and there is no affordable housing. Indeed, TOD contains no affordability.

District Fixes (DF) is another misnomer. It is a response to a small, vocal group of people who want to enlarge their houses without having to obtain variances. The bottom line is houses could be expanded by more than 50% in size. Every house could be a McMansion, eliminating the required approval by the Board of Standards and Appeals, amounting to another gift to developers that would have no effect on the cost of housing. DCP is proposing to accommodate that group by giving expansion rights that will also apply to neighborhoods that collectively don't want monster houses. It isn't a "fix". It is a replacement for a properly review zoning map change. It would be just another attack on the design, aesthetics, and character of hundreds of beautiful neighborhoods in NYC. Contextualization would be thrown out the window.

The provision for Accessory Dwelling Units (ADU) has been presented by the DCP as a benign effort to help families. The idea is that an owner of a home could convert a garage to a residential unit, or build a small backyard unit, to enable a family member (e.g., elderly parents) to live nearby. Again, how can you be against grandmas? But the ADU provision under consideration is a sprawling undefined mess that would permit the building of entire 2-story second homes in backyards, thereby eliminating light, air, and space for surrounding residents. Again, we're talking about destroying neighborhoods, turning them into back yard trailer parks.

There are 59 Community Boards in NYC. The COY has been presented to all of them. So far, 53 Community Boards have posted their votes. 27 out of the 53 Community Board votes posted thus far (6 are not yet officially posted) have rejected COY Housing Opportunities outright, while 23 others have recommended conditions which would significantly change or delete the provisions I've discussed here. Indeed, recently Community Board 4 in Manhattan, which includes Hell's Kitchen and Chelsea, voted no on the Housing Opportunities because of issues in their high-density district. But CB4 also explicitly rejected the COY one-size fits all approach, showing an understanding that COY may hurt people throughout the City. In other words, it wasn't just about them. CB4 gets my heartfelt thanks for having a conscience.

Lastly, there are other ways of doing things. Fifteen years ago, and after more than three years of meetings and work in good faith by members of my community with the DCP, the 2009 Flatbush Rezoning ("2009 FR") was approved. Unlike the COY, the 2009 FR was a collaborative effort based on meaningful community engagement. 2009 FR protected homes, and up-zoned our commercial corridors. As a result of the 2009 FR, several thousand units of housing have been created in our district, and more are on the way. We showed there is no need for the bulldozer one-size-fits-all approach of COY in order to create more housing.

The City would be better served if the DCP did the hard work of meeting with communities as they did in 2009, and tailoring plans for each community. Instead of the hostility they are facing now over COY, the DCP would engender respect and appreciation. I am not holding my breath. Only a relentless grassroots campaign of pressure on Council members will prevent the profoundly inappropriate provisions of COY from becoming law.

**LETTER TO DEPARTMENT OF CITY PLANNING,
BY JOEL A. SIEGEL, ESQ., DATED JULY 2, 2024**

JOEL A. SIEGEL
ATTORNEY-AT-LAW

July 2, 2024

Department of City Planning
City of New York
120 Broadway, 31st Floor
New York, New York 10271

Re: Opposition to City of Yes

To the New York City Department of City Planning:

I reside in Ditmas Park West, one of the Victorian Flatbush neighborhoods in Brooklyn. I am an active member of the community. I was the president of the Ditmas Park West Neighborhood Association for over ten years, and am currently a member of Community Board 14, but write now as an individual community member and homeowner.

I participated in the 2009 Flatbush Rezoning ("2009 FR"), which was a long-term plan reached by meaningful community engagement over several years. Community members were included in the formulation of the 2009 FR. As a result of the 2009 FR, Victorian Flatbush was preserved by rezoning to R3X, and our commercial corridors were upzoned, leading to the current surge in building along Coney Island Avenue and Cortelyou Road. Various provisions of the "Housing Opportunity" component of the City of Yes ("COY") fundamentally undermine the work the concerned citizens of Victorian Flatbush did with the Department of City Planning ("DCP") in 2009. Frankly, these provisions amount to a kick in the teeth, and they deliver a message to the residents of Victorian Flatbush that DCP cannot be trusted. If enacted, the Transit-Oriented Development, District Fixes and Accessory Dwelling Units provisions of the COY would spell the end of large swaths of Victorian Flatbush, an area that has been preserved by my neighbors and their predecessors for over 100 years. Beautiful homes would be torn down for luxury apartment buildings. It is, on no uncertain terms, a gift to developers; and, it is completely unnecessary if creating more housing is the sole goal. Bottom line is there are ample opportunities for building housing without bulldozing Victorian Flatbush. The COY takes a sledgehammer approach, without any concern for neighborhoods. Unlike the process leading to the 2009 FR, the people who formulated the COY did absolutely no community engagement. Stakeholder meetings for the current proposals did not include community members or community boards. Many members of my community view the COY as a betrayal of our good will and the work we did only 15 years ago for more housing.

NEW YORK, NY 10007
NEW JERSEY OFFICE: OMERDALE, NJ 08083
ADMITTED IN PA

While I have been a practicing attorney for almost 40 years, I am not a zoning expert. I leave it to my other Victorian Flatbush neighbors who are, for them to detail for you (as they are doing) the specifics of the offending COY provisions. Nevertheless, I must make the following comments:

1. There was no effective communication to the public about the massive COY changes (1386 pages!) to zoning of R1-5 areas. Victorian Flatbush residents are still finding out now about how their lives would be materially altered by the proposed zoning changes. The City is somehow able to send mass mailings for all sorts of information (e.g., recycling events, composting, elections, etc.), but for some reason(s) it did not see fit to do so for the COY. While Community Board 14 does its best to disseminate information, this is not a substitute for informing the public about something so fundamental about our way of life. The COY proposals now being considered certainly require further and more expansive explanations to the public by the DCP, including meetings with affected neighborhoods, and not just extremely limited public comments at a community board meeting. The COY is too much too quickly. My neighbors are of the belief they are being blindsided, and they are appalled by a process that is pitting neighborhoods against each other. They are justifiably concerned that the DCP will justify a favorable vote on COY because some community boards will support provisions that do not affect them (why should they care), at the expense of other neighborhoods. My neighbors believe quite rightly that this is fundamentally unfair and a charade.

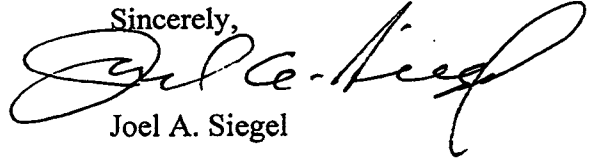
2. The COY takes a one-size fits all approach across the City, without consideration of differences among neighborhoods. There is no nuance. Consideration of environmental impacts has been cursory, at best. (The sewers in Victorian Flatbush already cannot handle drainage.) Indeed, and most dramatically, the COY utterly fails to account for the 2009 FR, which was the product of all the various interested parties coming together in good faith and reaching a community-wide consensus of what was best (on a long-term basis) for our area of New York City, while recognizing the need for affordable housing. It is my understanding that over the past decade, and almost entirely as a result of the 2009 FR, approximately 2600 residential units have been completed in Community District 14. Unlike the COY, there was no contentiousness when the 2009 FR was enacted. I spoke at the June 3, 2009, public hearing at the DCP for the 2009 FR. Twenty-two people spoke in favor. I don't recall a single person speaking in opposition. I would hope, but I am not confident, that the amount of opposition to the COY should give the DCP pause, to go back to the drawing board, and to do the hard work of meaningful community engagement.

3. The beauty of Victorian Flatbush is the soul of my community, and it is an economic engine to be preserved for future generations. In addition to the existing landmark designated areas of Victorian Flatbush, the Ditmas Park West and Beverly Square West neighborhoods were surveyed by the Landmark Preservation Commission, and we were told that our neighborhoods were worthy of future consideration for landmark designation. The proposed COY provisions and the destruction of homes would effectively end the quest for landmark status.

4. Finally, I call to your attention a fatal flaw in the entire COY rationale, that increased construction will lead to greater affordability. Eric Kober, former City Planning Director of Housing, Economic and Infrastructure Planning, in his recent lengthy review of COY, found that an increase in affordable housing "would be effective only with state legislation to reinstate a

property-tax exemption.” But this is not on the table. My neighbors recognize that the COY proposals are an attempt to solve a pressing City issue. However, as it stands, the COY is so unnecessarily sweeping and vast, that it essentially marks the end of meaningful local zoning regulation, but without any concretely projected impact on affordability.

Sincerely,

A handwritten signature in black ink, appearing to read "Joel A. Siegel", written in a cursive style.

Joel A. Siegel

BEFORE



AFTER



[EXTERNAL] Lift parking requirements

Ilmi Granoff <

Wed 10/23/2024 9:54 AM

To: Land Use Testimony <landusetestimony@council.nyc.gov>;

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Dear City Officials,

I own a residence and other properties throughout Brooklyn. I strongly endorse the lifting of parking requirements throughout the city, as do the vast majority of New Yorkers.

Kind regards,
Ilmi Granoff



Commitment to Improve the Quality of Life

October 22, 2024

Attn: New York City Council Subcommittee on Zoning and Franchises

Good morning, and thank you Chair Kevin Riley and Subcommittee members for the opportunity for India Home to testify regarding this important issue.

I am here today on behalf of India Home, a Queens-based nonprofit organization dedicated to serving vulnerable South Asian (SA) and Indo-Caribbean immigrant older adults across New York City. Our mission is to improve the quality of life for older adults and help them to age with dignity by providing culturally & linguistically competent social, psychological, recreational, and spiritual services. Since 2007, our organization has served over 5,000 seniors with senior center programs such as culturally sensitive meals, enriching programming including yoga, meditation, educational sessions, health and recreational sessions, creative aging activities, case management services, know-your-rights sessions, technology classes, mental health sessions, and advocacy among others. The organization has established the first of its kind Desi Dementia Day Care (3D Care) program for New York's older adults with low to moderate dementia. Currently the organization is operating two community shared living or "coliving" homes for South Asian older adults in Jamaica and Floral Park.

South Asian seniors are one of the fastest growing groups in NYC. Jamaica, Queens is home to one of the largest SA communities in New York City, inhabited by over 10,000 Bangladeshi (28%) foreign-born residents (Asian American Federation, 2018). Many SA older adults ages 65 and older are struggling to live in overcrowded shared households, facing elder abuse & neglect, and safety concerns (NYC Health, 2021). According to a 2023 report published by the Asian American Federation (AAF), the Asian American senior population in NYC has grown from 125,879 to 168,197 from 2015 to 2020, representing a 33.6% growth rate: the highest among all major racial or ethnic groups. Within this vastly diverse population, South Asian (SA) aging populations are growing at much higher rates than other AAPI groups, with certain SA ethnic groups such as Bangladeshi and Nepalese exhibiting rapidly growing populations due to recent immigration to the country in the last five to ten years. Because of the high population in the Jamaica area, there is a huge need for housing. However, existing housing options that are culturally-tailored and well-suited for these populations are very few in number.

Aristotle, the famous Greek philosopher, once said, "Man is by nature a social animal, and society is something that precedes the individual." This wisdom underscores the fact that, throughout history, humans have lived, worked, and thrived in groups. In modern times, the shared-living model of co-living has gained popularity, especially among millennials, who value community, collaboration, social networking, and shared economies. However, the pandemic starkly highlighted the vulnerability of seniors, many of whom lost life partners and found themselves isolated more than ever before.

Jamaica, NY 11432

• www.indiahome.org •

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Recognizing this, the board and staff of India Home embraced co-living as an ideal alternative living arrangement for seniors. Co-living offers affordability, flexibility, and the chance to form vital social connections. When India Home approached the NYC Department of Housing Preservation and Development (HPD) to develop co-living homes for seniors, they were informed of zoning restrictions that require R5 or above zoning for such projects to qualify for government funding. This posed a significant challenge.

Undeterred, India Home developed two co-living homes in Queens without government funding, relying on support from the community and philanthropic foundations. Notably, the New York Community Trust (NYCT) and the Fan Fox & Leslie Samuels Foundation embraced co-living as an innovative solution for senior housing in a city where housing costs are steep. The elders living in these homes experience a newfound joy, community, and purpose, being in these models. However, the City's support is needed to ensure this model is operationally sustainable.

New York City, known for its diversity and immigrant communities, must consider an inclusive, citywide approach to expanding and diversifying its housing supply. The NYC Aging Commissioner Lorraine Vasquez recently visited our co-living model and has voiced strong support for it to better house our aging immigrant community. To allow for more of such inclusive and effective models, the city must reconsider outdated zoning restrictions and support the development of co-living homes in single-family homes, two-family homes, and apartment buildings, within all zoning districts. This would enable more accessible and community-driven housing solutions for seniors.

Thank you again for your time and consideration. I look forward to continuing the conversation with you regarding these important changes in legislation and the expansion of the co-living model in collaboration with the City.

Sincerely,

A handwritten signature in black ink, appearing to read 'Vasundhara Kalasapudi', with a stylized flourish at the end.

Vasundhara Kalasapudi, Executive Director

India Home, Inc.

[EXTERNAL] ZHO amendment

Ira <

Wed 10/23/2024 10:02 AM

To: Land Use Testimony <landusetestimony@council.nyc.gov>;

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To whom it may concern,

This is about: "public hearing on the City of Yes Zoning for Housing Opportunity (ZHO) text amendment. The proposal to lift parking mandates is part of ZHO, which also includes several other pro-housing reforms such as universal affordability preference, permitting accessory dwelling units, and allowing faith-based institutions to build housing."

Parking minimums are a thumb on the scale only deserving in planned economies. If the goal is to benefit cars then there should be parking minimums.

The true democratic method is to let the builder decide how much parking there is.

I am a senior who wants safe, more pedestrian-friendly streets.

Sincerely,

Ira Gershenhorn



New York, NY



[EXTERNAL]

Irina Vovsha <[REDACTED]>

Fri 10/25/2024 3:51 PM

To: Land Use Testimony <landusetestimony@council.nyc.gov>;

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City's proposal Say Yes to the city

Dear Sir/ Madam

My husband and I say No. NO NO to the PROPOSAL.

My name is Irina Vovsha. I have been living in Forest Hills for 20 years. The reason to live in this area was simple. We wanted to raise our kids in a safe, green environment, in a private house in a low density area that was a suburban area close to the city.

The slogan to build affordable housing is a pure manipulation of the public.

There is no housing crisis. There is affordability crisis.

You deprived people of subsidized apartments.

You invited thousands, of not a million, migrants to invade our city.

You allowed to inflate the cost of living.

You allowed banks to increase the mortgage rates.

Now what? You are changing the zones codes to allow these hungry real estate developers to build their apartment buildings.

Again, everything is about money, power, and corruption.

If somebody deliberately wanted to destroy our neighbourhood?

What a shame !!!!

We all know how corrupted city mayor and government received donation so that now they have to pay back.

And again, at our, middle class, hard working people expense.

If the city hall makes this decision to accept the proposal, we the people will accept it as a treason.

There is only one truth. If you pretend otherwise, you stab all of us, destroying our communities and neighbourhoods.

Regards,

Irina and Peter Vovsha

[EXTERNAL] City of Yes for Housing Opportunity

Iris Gross < >

Wed 10/23/2024 2:44 PM

To: Land Use Testimony <landusetestimony@council.nyc.gov>;

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My name is Iris gross and I am a lifetime resident of Ditmas Park Flatbush and I am opposed to the City of Yes for Housing Opportunity.

From: [Irving Lee](#)
To: [Land Use Testimony](#)
Subject: [EXTERNAL] On City of Yes
Date: Monday, October 28, 2024 5:05:41 PM

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Given the complexity of proposing a broad base housing plan that encompasses various neighborhoods along with a number of other variables including parking and infrastructure upgrades, it is best to first address the existing housing stock that is being "warehoused" and have laws that address concerns that property owners have that allowed the housing shortage to begin with. This includes overturning the existing HSTPA restrictions and allowing the market to raise the legal rent and allow property owners to economically renovate existing housing stock. Subsidization can be utilized to make housing affordable based on means testing of tenants.

Thousands of apartments will be made available if this happens. This will provide an immediate solution to much of the affordable housing stock shortage while other proposals such as the City of Yes can be fine tuned and implemented.

Irving Lee

From: [Ivanka Navarro](#)
To: [Land Use Testimony](#)
Subject: [EXTERNAL] Hearing
Date: Friday, October 25, 2024 12:36:28 AM

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I support the city's efforts to address the housing crisis by easing restrictions and expanding affordable housing. However, it is just as crucial to preserve the local industries that make New York City a global leader—particularly the specialty garment manufacturing sector that has long defined the Garment District. This neighborhood is not only a hub for fashion but also a vital part of New York's identity, serving Broadway, film, television, and the wider fashion industry. It is home to fabric and notion vendors, artisans, and specialty legacy makers whose expertise fuels creativity and innovation across multiple industries.

As the city moves forward with housing expansion, we strongly urge you to implement incentives that protect maker and manufacturing spaces in the Garment District. These industries provide good, stable jobs and are the backbone of a thriving local economy. Without such protections, we risk losing the infrastructure that supports Broadway's iconic productions, the fashion that drives New York's global reputation, and the costuming that brings film and television to life. By ensuring that both affordable housing and our world-class manufacturing sector can coexist and grow, we can secure a future where New York remains a city of opportunity, innovation, and creativity for all.

Sent from my iPhone

[EXTERNAL] 5th Gen NYCer Supports City of Yes



Wed 10/23/2024 2:20 PM

To: Land Use Testimony <landusetestimony@council.nyc.gov>;

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I am writing today to urge the council to support and pass the city of yes bill as is. I am a 5th generation New Yorker who has personally seen how severe our housing crisis has gotten and the necessity of mass construction to fix it. My greatest wish is to raise my family in the city my family has lived in for 150 years, and I ask you to make that possible by passing this bill.

[EXTERNAL] No to city of yes

Jacklyn Tulipano <

Wed 10/23/2024 9:55 AM

To: Land Use Testimony <landusetestimony@council.nyc.gov>;

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Subject: Opposition to the City of Yes Initiative

I hope this message finds you well. I am writing to express my concerns regarding the City of Yes initiative currently under discussion in New York City.

While I understand the intention behind this initiative is to promote growth and development, I believe it poses significant risks to our community. The potential for increased density without adequate infrastructure and resources could lead to overcrowded neighborhoods, strained public services, and diminished quality of life for residents.

Moreover, the environmental impacts of rapid development must be carefully considered. We should prioritize sustainable practices that protect our green spaces and ensure that any growth aligns with our city's long-term vision for a healthy and vibrant community.

I urge city officials to reconsider the implications of the City of Yes initiative and to engage in more comprehensive discussions with community members and stakeholders. It is essential that we find a balanced approach that fosters growth while safeguarding the interests of current residents.

Thank you for considering my perspective. I look forward to seeing how this initiative evolves in a way that truly benefits all New Yorkers.

Best regards,

Cornish / Tulipano Family



Bronx, NY 10465

Sent from Jacklyn Tulipano

[EXTERNAL] City of Yes for Housing Opportunity

Jacob deCastro <



Wed 10/23/2024 12:20 PM

To: Land Use Testimony <landusetestimony@council.nyc.gov>;

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Good afternoon,

I am writing in strong support of City of Yes for Housing Opportunity. It's no secret: New York City doesn't have enough homes for everyone, and the city needs to take steps today to ensure everyone who wants to call New York City home has the ability to.

I've lived in Brooklyn for 3.5 years now, and I want to be able to afford to stay in the city that I've chosen to call home. I've had friends and family move out of New York City in this time because the cost of living is just too high. The City Council has the incredible opportunity right now to build a little more housing in every neighborhood, and give people the same opportunity I had.

I also strongly encourage that the Council adopt the removal of parking mandates for new housing — which doesn't mean *no* new parking, just the *right* amount for a given project. Given the impacts of the climate crisis, we need to be doing everything we can to reduce driving.

Thank you,
Jacob deCastro
11237

[EXTERNAL] City of Yes for Housing Opportunity

Jacob Danish Sloan <



Sat 10/26/2024 11:22 AM

To: Land Use Testimony <landusetestimony@council.nyc.gov>;

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Hello,

As a New Yorker I urge you to remove parking mandates to make it easier for abundant new housing to be constructed. Parking mandates drive up the cost of building housing and result in fewer units being created, at a time in which NYC suffers from a severe shortage of units. Also, parking mandates encourage private car usage in walkable areas that have great public transit where the majority of residents do not own cars. Other great, world-class cities like Paris, Tokyo, London, etc. do not have parking mandates. Even other, smaller U.S. cities, such as Minneapolis, are ditching parking mandates -- NYC needs to catch up.

Thank you,
Jacob Sloan

From: [Jacqueline Bosco](#)
To: [Land Use Testimony](#)
Subject: [EXTERNAL] Oppose The CITY of YES
Date: Wednesday, October 23, 2024 6:18:21 PM

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To Whom it May Concern:

The City of Yes plan, a 1 glove fits all agenda, is a poor fit for our community. This proposal will put additional burden on already overwhelmed infrastructure in flood prone areas. Place stress on already overcrowded and many underperforming schools. In most situations increased population and density will jeopardize public safety. Our police force, fire department, EMS, health and human services cannot withstand additional work loads. This aggressive plan will remove parking mandates for new development projects. Our car-centric, low density R 1 - R 5 neighborhoods are already parking deprived. A housing crisis is the alleged reason for this over reaching plan. However, allowance of tens of thousands of new entrants to our city while there is a crisis is akin to strategically placing additional holes in a sinking ship. New York City cannot maintain their sidewalks Over 9,000 sidewalks damaged by tree roots await repair. The repair wait list exceeds 5 years. New York City please fix what you have before adding more. Go back to the drawing board and do a district by district assessment. Determine which fingers properly fit the gloves and bring a modified product back to the respective council members and their constituents for approval. Force feeding creates a gag reflex. This plan in its current state is not digestible for many New Yorkers.

Thank you in advance for your anticipated cooperation.

Jacqueline A. Bosco
2 [REDACTED]
Bronx, NY 10461

From: [REDACTED]
To: [Land Use Testimony](#)
Cc: [Gennaro, James](#); [Yam, Henry](#); [Nily Rozic](#); [Alan Ong](#); [Hudy Rosenberg](#)
Subject: [EXTERNAL] Fw: "City of Yes" Testimony in Opposition
Date: Friday, October 25, 2024 1:23:49 PM

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HILLCREST ESTATES CIVIC ASSOCIATION.

Reference: https://www.nyc.gov/assets/planning/download/pdf/plans/jamaica-hill-hillcrest/jamaica_hill.pdf

My name is Jackie Forrestal and I am the Corresponding Secretary of the Hillcrest Estates Civic Association. Our community is located in Northeastern Queens in Community Board 8. We stand with the Community Board in opposition to the folly of the 'City of Yes'. Without the necessary and appropriate planning for schools, parking, infrastructure such as sewers, and planning for emergency services such as health care and hospitals, FDNY, and police budgeting, this proposal will create chaos. It will not create any increase in affordable housing.

In 2006, Hillcrest Estates was part of the rezoning known as Jamaica Hill/Hillcrest Rezoning. The following is the text from that approved plan that was carefully constructed by the Queens Office of City Planning.

The proposed rezoning from R2, R3-2, R4 and R5 districts to lower-density or contextual districts aims to preserve the area's predominant low-rise character and ensure that future residential development is consistent with its surrounding neighborhood. Additionally, to address the need for new housing at a scale in keeping with neighborhood character, the proposed rezoning would establish a new moderate-density residential district – R5D -- along Union Turnpike, Parsons Boulevard and 164th Street.

This rezoning also created a new zoning category —R5D—to provide more housing along our surrounding wider corridors. City Planning carefully reviewed every property and discussed at length the details of the new zoning category and how they proposed to change R4 properties that were single family to the recently created R2A. Attached properties became R4B. We have the file of emails and research. I can assure you that every detail was presented to us and carefully crafted. As noted in the text above, we were not dealt the crushing blow that The City of Yes will strike to our enjoyment of yards and green spaces. We looked at shadows and changed the original plan to prevent shadows on homes to the west.

Has anyone actually looked at what environmental and flooding dangers may be created if The City of Yes is passed and there is an increase of impermeable spaces with no changes to our sewer infrastructure?

We are members of the Queens Civic Congress and we add our voice of opposition to theirs. Everything that they have argued and presented in opposition should be reviewed very carefully. Upon seeing the facts, please use your common sense and VOTE NO . If affordable housing is your goal, this plan is not your answer.

Respectfully submitted,

Jacqueline Forrestal
Corresponding Secretary
Hillcrest Estates Civic Association
[REDACTED]
Jamaica, NY 11432

[Sent from the all new AOL app for iOS](#)

From: [Jacqueline Hewitt](#)
To: [Land Use Testimony](#)
Subject: [EXTERNAL] Testimony For Zoning For Housing Opportunity
Date: Tuesday, October 29, 2024 8:15:19 PM

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My family and I oppose the City of Yes for Housing Opportunity text amendment. We live in Flatbush Prospect Lefferts Gardens where many blocks are not yet landmarked. Our block enjoys community and connections with its neighbors, some of whom have been residing here for over 40 years. There is a strong commitment to the community from long-time and recent home owners and apartment residents. There is great value in a neighborhood where people aren't forced to leave and can live where they appreciate their neighborhood. We oppose the Zoning for Housing Opportunity amendments and request that your council members vote "No." These amendments are not ideal. As you are aware, there is not a need for further upzoning to create housing or affordable housing; in fact, there is a need for "right zoning" to preserve the stability of our residential community, historic architecture and small business and ensure that population density does not overwhelm infrastructure, including sewers, public schools, parking, sidewalks, subways and sanitation. Please support community based planning to allow local community boards and council members to determine where and whether zoning or parking waivers are appropriate in exchange for affordable housing or other community benefits and mitigation of environmental effects. Adding density or reducing parking is appropriate in different places in different communities. Most of District 9 is covered by R6 and R7 zoning that would receive massive density increases, leading to the demolition of most of our neighborhood, with current tenants having to leave and wait years before competing with the rest of the city in a lottery for new apartments. Support non zoning affordable housing strategies, especially affordable housing preservation. According to the city planning equitable development data explorer, 2/3 of Community District 9 dwelling units are in rent stabilized buildings. In addition, over 25,000 units of buildable housing remain possible under the current zoning. Thank you for your attention. Your constituent,

From: [Jaimini Vyas](#)
To: [Land Use Testimony](#)
Subject: [EXTERNAL] City of Yes for Housing Opportunity—Housing people NOT Cars
Date: Wednesday, October 23, 2024 5:31:25 PM

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Dear NYC City Council,



The majority of New York City's voters are have-nots: i.e., they do not have cars. For example, as a humble City employee, I ride my non-electric bicycle to work.

What separates Buffalo, Austin, and San Jose from New York City?

They've all **gotten rid of parking mandates** — a burdensome and outdated zoning requirement requiring parking in new housing developments, making housing more expensive and increasing car ownership.

This week, New York City got one step closer to removing parking mandates for new housing as the Department of City Planning's *City of Yes for Housing Opportunity* went before a marathon, two-day City Council Hearing.

Not only would City of Yes remove costly parking mandates, but it would also allow new

housing near transit lines, a proven way to reduce emissions and grow transit ridership. Both are essential for New York City to meet its climate goals and end car dependency.

Here's what we know:

- **Parking mandates impede affordable housing development**, increase construction costs and rents, and disproportionately burden low-income households with costs.
- **Building new housing along transit lines reduces emissions**, improves access to jobs, boosts neighborhood well-being, and makes commuting easier.
- **The proposal is popular:** 74% of New York City voters support lifting parking mandates – with just 17% opposed — according to a new poll from Open New York.

Please, it's beyond late to lift parking mandates to lower our rents by passing City of Yes. Please give us our space back and help lower our rents.

And, to prepare for any possible ensuing litigation in the event the City government is not persuaded to pass City of Yes, please restore the \$65 million funding for the NYC Law Department that was cut for FY 2025, then increase the funding by 50%. Those poor honest, working-class people are underpaid and overworked. The Law Department is already stretched thin with many lawyers possibly working 15-30 unpaid hours each week over the time for which they are compensated. See <https://council.nyc.gov/budget/wp-content/uploads/sites/54/2024/03/025-LAW.pdf> at 5.

The above can easily be inferred by the disastrous hiring freeze imposed upon a Law Department that has been bleeding lawyers for years: "the November Plan included a previous hiring freeze PEG of \$1.5 million in Fiscal 2024 and \$7.0 million in Fiscal 2025, with a headcount reduction of 56 positions in Fiscal 2025 only. The Department's actual headcount has significantly decreased since the onset of the pandemic. In addition to the citywide hiring freeze and restrictions, there has also been significant attrition of staff... . **The Department's ability to hire and retain sufficient staff, particularly lawyers, is a budget concern as it could directly affect its ability to manage cases efficiently and cost-effectively.**" Id. at 9 (emphasis added). This, while median salaries are \$435,000 in the private sector. See <https://abovethelaw.com/2023/12/biglaw-raise-bonus-tracker-2023/>.

Since each of these lawyers likely saves millions of City Fisc dollars, by reducing their headcount and increasing their workload, the City has chosen to bleed billions of taxpayer dollars from public projects and services into the private sector's pockets, hurting hard-working, middle-class, New York City voters.

Respectfully submitted,

Your voter, supporter, and taxpayer.

—
Jaimini A. Vyas

[REDACTED]

www.linkedin.com/in/jvyaslaw

From: [j.bosley](#)
To: [Land Use Testimony](#)
Subject: [EXTERNAL] City of Yes for Housing Opportunity
Date: Wednesday, October 23, 2024 4:27:19 PM

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Hello. I am a resident and voter in Manhattan Council District 10. I ask that the council **END the outdated parking mandates** for new construction which makes housing less affordable and encourages more people to use cars instead of public transportation.

Thank you

James Bosley

[EXTERNAL] COYHO TESTIMONY



Wed 10/23/2024 11:34 AM

Inbox

To: Land Use Testimony <landusetestimony@council.nyc.gov>;

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Dear City Council Members and the Planning Commission,

As a 28 year resident of Prospect Park South in historic Victorian Flatbush, I am writing to express my **opposition** to the Housing section of the City of Yes, **especially the Transit-Oriented Development (TOD) - one size fits all** provisions that could dramatically alter the character of Prospect Park South and all of "Victorian Flatbush."

I am sure that the council members are being besieged by constituents on both sides of this proposal and considering all the issues at play, it will not be an easy decision. There are many good ideas in COYHO but the **TOD** component would spell disaster without a payoff for many low density neighborhoods.

Those of us on the opposition side have not been able to hire lobbyists or have inside tracks with the council to expedite our points of view, while the planning commission has. We are being rushed through this as many have noted and I can truly say that most residents of PPS have no idea what is going on. We really deserve better than having this rammed through by this questionable administration.

Please fill in for yourselves all the other **important points against this proposal - especially TOD** - that many of my neighbors have made in person, on Zoom and in writing. Infrastructure, Luxury not Affordable, Community Engagement, etc. - I agree with them and they are important reasons to oppose this bill.

But I want to close with an appeal to your emotions and your love of New York City.

- Imagine New Orleans knocking down historic homes on every corner in the French Quarter or the Garden District sections of their city and replacing them with 3-5 family cheap and ugly apartment buildings.
- Imagine Washington D.C. knocking down row houses on every corner in Georgetown and replacing them with out-of-character apartment buildings.
- Imagine any large U.S. city that has neighborhoods of architectural significance knocking down beautiful old buildings on every corner so that they could "**build a little more housing in every neighborhood.**"

And before you argue that this is a crisis and people are more important than buildings, please remember that **Transit-Oriented Development provides no low-cost housing**. There is *nothing* in the TOD section calling on any of these apartments to be built to provide affordable purchase or rental options. **Zero.**

There are better solutions on the table in our neighborhood that would allow higher density on our main arteries and retail corridors while preserving the character of this beautiful section of Brooklyn. NYC zoning should not be one solution fits all.

In Conclusion, in Victorian Flatbush, TOD will:

1. **knock down possibly hundreds of beautiful Victorian Homes**
2. **allow ugly, out-of-character buildings to replace them (sure to be marketed as LUXURY!)**
3. **and really only provide a few more net apartments and at market rates**

Please Vote No on City of Yes Housing in its current form that includes Transit Oriented Development as currently defined.

Thank you!

Sincerely,

James Dougal

James Dougal |



From: [REDACTED]
To: [Land Use Testimony](#)
Subject: [EXTERNAL] City of Yes
Date: Thursday, October 24, 2024 1:59:49 PM

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As a thirty year resident and twenty year homeowner in the Castleton Corners/Westerleigh areas of Staten Island,
I am concerned with the proposed changes to the zoning laws regarding the City of Yes.

The infrastructure of this area is already overloaded due to overpopulation and subsequent traffic congestion patterns. Also given the recent City Hall investigations into Mayor Adam's and his associates, no new programs or directives should be initiated under his leadership as he is not to be trusted at this time.

Sincerely,

James J McGuire
[REDACTED]

[EXTERNAL] City of Yes

James Minogue <

Fri 10/25/2024 8:39 PM

To: Land Use Testimony <landusetestimony@council.nyc.gov>;

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To Whom It May Concern,

I am writing regarding the “City of Yes.” I have read this proposal and am definitely against the platform.

My wife, my child and I are life-long citizens of New York City. We were educated here (grammar school through graduate degrees), worked in the city and developed close friendships with other people in the neighborhood. We are still citizens of this great city. In addition, we know and appreciate all that the city has to offer in its rich history, in sports, culturally, and its willingness to support and protect all citizens and non-citizens.

We consider ourselves lucky to grow up in and live in a neighborhood where neighbors support each other. When our child was younger, we were active with local neighborhood organizations such as scout groups, sports programs, displaying flags on neighbors’ lawns, participating in religious services, etc. We still remain active in a number of community events and enjoy the friendly and supportive nature of our neighborhood. However, if the “City of Yes” becomes part of our society, all of this will change. The local community will be altered drastically. We will no longer know our local neighbors as the area will become transient. In addition, people will not be satisfied with the decrease of infrastructure to support the neighborhood. We hardly have any police officers now, this will only get worse. Our schools are overcrowded, our electric base is often lost and we have been the victims of flooding. How will the “City of Yes” help us? IT WON’T! Local citizens will not be happy when their children are placed into crowded classrooms and the percentage of students who can read on grade level and complete grade level math problems will decrease. Local citizens will be frustrated when their electric grids continuously cause brown outs and black outs. Others will be concerned when major storms hit the area and their basements are flooded. In retrospect, didn’t some people die recently due to a flooded basement? Our transit system will be overwhelmed with citizens trying to get to the city for work or various events. This will only encourage local citizens to purchase cars as this will be the only way they can get around the neighborhood.

Please consider these concerns as you vote on the “City of Yes.”

Thank you for your attention to this matter.

From: [Jan Lindsay-Smith](#)
To: [Joseph, Rita](#); [Desouve, Joel](#); [Land Use Testimony](#); [Speaker Adams](#)
Subject: [EXTERNAL] Testimony For Zoning For Housing Opportunity
Date: Wednesday, October 23, 2024 9:07:42 AM

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To Whom It May Concern:

My husband and I oppose the City of Yes for Housing Opportunity text amendment. We live in Flatbush Prospect Lefferts Gardens where many blocks are not yet landmarked. Our block enjoys community and connections with its neighbors, some of whom have been residing here for over forty years. There's a strong commitment to the community from long-time and recent home owners and apartment residents. There is great value in a neighborhood where people aren't forced to leave and can live where they appreciate their neighborhood.

We oppose the Zoning for Housing Opportunity amendments and request that your council members vote "No." These amendments are not ideal. As you are aware, there is not a need for further upzoning to create housing or affordable housing; in fact, there is a need for "right zoning" to preserve the stability of our residential community, historic architecture and ensure that population density does not overwhelm infrastructure, including sewers, public schools, parking, sidewalks, subways and sanitation.

Please support community-based planning to allow local community boards and council members to determine where and whether zoning or parking waivers are appropriate in exchange for affordable housing or other community benefits and mitigation of environmental effects. Adding density or reducing parking is appropriate in different places in different communities. Most of District 9 is covered by R6 and R7 zoning that would receive massive density increases, leading to the demolition of most of our neighborhood, with current tenants having to leave and wait years before competing with the rest of the city in a lottery for new apartments.

Support non-zoning affordable housing strategies, especially affordable housing preservation. According to the city planning equitable development data explorer, 2/3 of Community District 9 dwelling units are in rent-stabilized buildings. In addition, over 25,000 units of buildable housing remain possible under the current zoning.

Thank you for your attention.

Your constituents,
Jan and Andrew Lindsay-Smith



Testimony, October 21, 20-24, City Council Public Hearing: City of Yes for Housing.

My name is Jane Buchanan and I am a long-time resident of Chelsea in the borough of Manhattan. I live at Penn South, also known as Mutual Redevelopment Houses, a limited equity cooperative. I am speaking on my own behalf. I am here to urge you to vote No on the City of Yes.

I have concerns for my own housing complex, for my neighborhood as a whole and not the least for neighborhoods all over the city.

A particular concern is The City of Yes putting forward special provisions for expanded market rate housing and other developments, with no guarantee of 100% affordability, on what are referred to as Campuses. There is no clarity on how such "infill" developments would affect the character and livability of our neighborhoods, including taking away much needed open space and intensifying gentrification.

An additional concern is that in the City of Yes, there is a woeful lack of provision for community input and participation as the plan would go forward.

Indeed, yes, there is a profound need for affordable housing throughout the city. However, The City of Yes with its reliance on adding more market rate housing will not solve the problem. Vote No on the City of Yes.

Thank you.

Jane Buchanan, [REDACTED]

[REDACTED]

New York, NY 10001

From: [REDACTED]
To: [Land Use Testimony](#)
Subject: [EXTERNAL] City of Yes for Housing Opportunity
Date: Monday, October 28, 2024 8:18:17 PM

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If you have read any of the recent--great--books about parking, such as *Paved Paradise* (Grabar) and *The High Cost of Free Parking* (Shoup), you would know that requiring one or more parking spaces per apartment raises the cost of real estate, discourages low/middle-income housing developments, and encourages sprawl. If there's one place where free parking is definitely NOT needed, it's in the city with the best public transit in the nation: NYC. Please rethink this outdated requirement and ditch costly parking mandates.

Best,
Jane Carter

[REDACTED]
New York, NY 10128

Sent with [Proton Mail](#) secure email.

[EXTERNAL] City of Yes for Housing Opportunity (ZHO)

Jane Lindberg <

Wed 10/23/2024 10:56 AM

To: Land Use Testimony <landusetestimony@council.nyc.gov>;

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As a resident of Manhattan's Upper East Side for nearly 45 years, I oppose the City of Yes for Housing Opportunity because it does not offer meaningful affordability for middle class families.

Affordability under this plan is not mandated. Affordability must be mandated. The years of letting developers control access to affordable housing must end.

Most of these proposed zoning changes are of immense value to for-profit developers. Let them pay for this new privilege and opportunity. Mandate **not less than 35% of all residential units** to be affordable to households earning **between 30% and 50% of the Area Median Income (AMI)**. With average annual salary in NYC at \$51,042, lowering the threshold is absolutely essential.



Now is the time to offer some relief from the existing overcrowding, lotteries, and punishingly long waitlists for “below market housing” far from friends and family.

Genuine and permanent housing affordability is **the only way to restore long-term residents who establish roots, patronize and create local businesses, and stabilize neighborhoods.**

This is why I oppose the Mayor's City of Yes for Housing Plan because it does not offer meaningful affordability for middle class families. I urge that it be revised.

notes:

"The Universal Affordability Preference is a new tool that would allow buildings to add at least 20% more housing, if the additional homes are affordable to households earning 60% of the Area Median Income (AMI). As a result, it will deliver new affordable housing in high-cost neighborhoods across New York City to working families." [<https://zap.planning.nyc.gov/projects/2023Y0427>]

2024 New York City Area Affordable Monthly Rents are reported here:

<https://www.nyc.gov/site/hpd/services-and-information/area-median-income.page>

What is the average salary in New York? \$50,042.

<https://www.talent.com/salary?job=&location=new+york%2C+ny>

Thank you for taking my view into consideration.

Jane Lindberg

[EXTERNAL] City of Yes



Fri 10/25/2024 10:00 PM

To: Land Use Testimony <landusetestimony@council.nyc.gov>;

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To NYC Council Members:

We are writing to urge you to vote **No** on the City of Yes Proposal. We have worked hard and saved up for years to purchase homes in the city that we love. Our single family home neighborhoods are oases in a diverse city. Our neighborhoods cannot sustain the construction of apartment buildings or stores where one-family homes once stood. The infrastructure is not compatible with this proposal.

Please do not allow this proposal to pass.

Thank you.

Janet Rhein
Douglaston Resident

I have lived in Victorian Flatbush, which, by the way is not an exclusively single-family neighborhood, for the past **37** years. We ate spaghetti most nights, and rented a unit in our two family house so that we could pay the mortgage. We cleaned up crack viles on a daily basis, and could leave nothing outside of our house, as porch furniture was routinely stolen. In the winter months, in the early darkness, we walked to the train station every evening to ensure our eldest daughter's safety as she walked down Cortelyou Road. Streets were treeless. Houses were covered with asbestos shingles or peeling paint. There was an abundance of 99cent stores, a sole pizza place, no trendy restaurants, yoga studios, cafes, beauty spas, or real estate offices.

In the decades that followed our arrival, a community was formed. We planted trees, cleaned playgrounds, formed neighborhood associations. We struggled to find our identity, eventually welcoming a Men's Homeless Shelter. A Migrant Shelter has opened with community support. I resent that Victorian Flatbush has been characterized as "privileged". We are anything but that. We rank 59, of 59 communities for the amount of open green space that exists.

In 2009, after 4 years of collaborative planning, members of our community were able to pass a rezoning plan. Coney Island Ave was upzoned to allow for the development of additional apartment buildings with minimal displacement of existing tenants. This corridor is well within the boundaries of our community, not separate, as was stated in a report by the City Planning Commission. The 2009 plan changed the zoning for the existing Victorian homes to an R3X contextual district, thus protecting these houses from demolition. In the 10 years that followed this rezoning, more than 2600 housing units were developed, and, at present, 4 projects are in process. Having recognized the need for more housing 15 years ago, we rank among the top districts in NYC to add new housing units.

Victorian Flatbush supports the addition of housing, but begs you to consider our history and the limits of our resources, by not allowing developers to destroy our homes. We oppose the Transit Oriented Development portion of the City of Yes proposal, as it would allow for the demolition of our community, and resent being singled out to increase the Floor Area Ratio from 0.6 to 1.0.

Please don't destroy our neighborhood.

From: [janina quint](#)
To: [Land Use Testimony](#)
Subject: [EXTERNAL] Zoning COYHO
Date: Tuesday, October 22, 2024 4:28:54 PM

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My neighborhood SoHo/ Noho is targeted completely unfairly by the section 15-01 zoning amendment with a discriminating art fund tax. If the city needs to raise money, how can you single out one neighborhood to raise revenues? Why is New York punishing the people who actually built and cared for this neighborhood? Noho is my home we raised our family. Please reject this proposal and treat all New Yorkers equally.

Best,
Janina Quint

From: [REDACTED]
To: [Land Use Testimony](#)
Subject: [EXTERNAL] No to City of Yes
Date: Thursday, October 24, 2024 7:06:11 PM

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I learned in Kindergarten the use of the word no. There is no situation on earth that you want to say yes to everything, and certainly not in a land and development use situation.

The city of yes will create more homogenized, overcrowded, over populated areas in a city with no money or funding to handle it. Then watch the people flee as elected leaders try to figure out how to manage without their tax base.

I am a citizen of Pelham Bay and am clearly against the city of yes. Areas need to be able to have control and say no to certain aspects of development to protect their neighborhoods culture, for environmental and health issues and most of all safety.

This plan will not increase affordable housing when real estate corporations a la the style of Black Rock take over rental or housing units and monopolize the market.

We are not dumb. We know what you are setting out to do and whose hand is in your pocket. It's about time elected officials listened to the people of the city and not their own self-promoting agenda.

Sincerely,
Janine Franciosa

Sent from my iPhone

From: [Janine Nichols](#)
To: [Land Use Testimony](#)
Subject: [EXTERNAL] I say NO to the City of Yes
Date: Thursday, October 24, 2024 2:49:19 PM

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As soon as the pandemic hit and people lost their jobs and the ability to sustain their livelihoods and their housing, I predicted, based on my experience as a housing activist in Crown Heights, that Big Real Estate would weaponize the housing chaos to their advantage. And now we are confronted by their City of Yes, by which they pretend to want to build housing for the least of us.

A native of Brooklyn, now 71, I have seen numberless givebacks by the City to the developers in the name of building affordable housing. I shouldn't have to point out that NONE HAS BEEN BUILT (Only the federal government has built low income housing and I welcome VP Harris's determination to do so again).

And nothing, NOTHING, in the proposals for the City of Yes suggests that this time will be any different: deregulation only leads to recklessness, lawlessness. The only benefits are short term and collected by shareholders only. Deregulation has given us forever chemicals, unsafe air and water, wildfires, loss of animal habitat, climate change, each an existential threat to human existence.

CITY OF YES proposes, essentially, to dispense with ALL regulations for developers, sanctioning unfettered construction ("Build, baby, build," to quote our corrupt mayor), once again in the name of building affordable housing.

For instance: "Mixed use" apartment buildings! Tenants will be able to use 50% of their floorspace for business (well more than the IRS allows), though no two residents may operate the same business. How pretend-thoughtful.

The potential reality: Dog kennel next door, dance studio above, 3-D printing business below, dance studio to the other side. Strangers roaming the building, customers buzzed in by business operators. Signage in windows. Who would want to live in such a place? But people don't know what is coming for them; that's all part of Big Real Estate's plan.

And where will a resident turn to when their apartment fills with fumes from the salon, the

groomer, the printer? 311? Hahaha. There is no enforcement of quality of life regs now, much less in the COY, where there are no quality of life regs.

Deregulation led directly to the terrifying GRENFELL FIRE in London in recent years: architects, designers, engineers, makers of construction materials, builders, local electeds: all recklessly approved the use of materials known to be dangerous because they knew there were no eyes on them. Indeed, the makers of the flammable cladding specifically targeted London for sales of its dangerous product following deregulation. Maybe soon they can sell it here.

YES, we need affordable housing. Real Estate Developers cannot be trusted to build it. They have proven so time and again when they got the tax breaks and rezonings they demanded and still built only market-rate apartments.

COY is an abdication of the Council's responsibility to take thoughtful actions in the interest of all New Yorkers. Reckless deregulation will not result in the creation of affordable housing, only in further corruption, dangerous building practices, increased loss of sunlight and greenspace, more near-empty luxury buildings and disappearance of small storefront businesses.

Say NO to the Clty of Yes.

Sincerely,
Janine Nichols



Brooklyn 11238

From: [Janine Robinson](#)
To: [Land Use Testimony](#)
Subject: [EXTERNAL] City of Yes housing
Date: Wednesday, October 23, 2024 6:14:28 PM

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Subject:City of Yes Housing
No to City of Yes .

Preserve

City Island's Special District Zoning , Bronx 10464 .
Janine Robinson
City Island Resident

Sent from my iPhone

From: [Jason Gers](#)
To: [Land Use Testimony](#)
Subject: [EXTERNAL] I support lifting the parking mandate
Date: Thursday, October 24, 2024 10:16:50 PM

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Hello,

I am writing to support the city making the decision to remove the parking mandate for housing. This is the most important piece of the puzzle that will reduce the cost of producing new housing and increase affordability. There is an affordable housing builder on the executive committee on my community board in Bushwick and he has explained from personal experience how he has had to abandon projects due to the ridiculously high cost of parking, even in places with ample public transportation.

We must move this city into the future by building new 21st century housing that makes room for our young people to stay in New York and not be forced to move away from family due to extreme housing costs. We must get back to a place where NYC can be a hospitable place for lower income folks in the working class, young people, seniors, artists and the disabled.

We do not want NYC to become like Long Island -- an aging place with a declining population and prohibitively high housing costs because of the lack of new building. The exclusive nature of Nassau and Suffolk housing only breeds similar exclusionary thinking -- xenophobia, racial segregation, toxic individuality. We must overcome this backwards thinking and build our way to a new era. Our state continues to lose congressional representation and national relevance due to a failure to promote a pro-housing-growth agenda. We continue to lose our place in the national spirit to red states who still believe in building.

Thanks for your consideration.
Please vote to remove this parking mandate once and for all.

Jason Gers
Bushwick Brooklyn

From: [Jay Shuffield](#)
To: [Land Use Testimony](#)
Subject: [EXTERNAL] Support for "City of Yes"
Date: Friday, October 25, 2024 9:17:25 AM

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I am writing to note my support for the "City of Yes" zoning reform. Advising the zoning regulations to make it easier to build more housing at less cost is critical for sustaining the economic health of our city. New York City did not become one of the world's greatest places by making construction unnecessarily difficult or resisting change.

I particularly support the elimination of parking requirements. Forcing developers to include parking results in subsidizing car ownership at the expense of the residents who pay for the cost. Moreover, artificially reducing the costs of car ownership skews transportation decisions in the most negative way by encouraging people to use the most dangerous and environmentally destructive option, which erodes the quality of life on our streets and sidewalks.

Finally, I object to the rhetoric of Council Members who say citizens like myself, who were born elsewhere and worked hard to make it here, should not have a voice in discussions about improving the city where we live, work, raise our families, and contribute to civic life.

Jay Shuffield