

July 10, 2024

AIA New York Testimony to the City Planning Commission on City of Yes for Housing Opportunity

Bria Donohue, Senior Manager of Government Affairs

Good morning! Thank you, Chair Garodnick and members of the City Planning Commission, for holding this hearing today. I am Bria Donohue, Senior Manager of Government Affairs at American Institute of Architects New York. We represent more than 5,000 architects and design professionals committed to positively impacting the physical and social qualities of our city.

AIA New York strongly supports the proposed citywide zoning text amendment, *City of Yes for Housing Opportunity*, specifically the transit-oriented development, universal affordability preference, and office-to-residential conversion proposals. The proposal takes an all of the above approach, making critical changes to the city's zoning to eliminate antiquated barriers that restrict development and burden our already struggling housing market, enabling every neighborhood to do their part to build affordable housing.

The City of Yes proposal is a historic effort to tackle NYC's housing crisis, and we applaud the Department of City Planning for all their hard work and dedicated community outreach. The need for these changes cannot be overstated as New Yorkers struggle from the persistent burden of the ongoing housing crisis. This proposal will have widespread effects on NYC's housing market – namely, creating missing middle housing. We need housing of all types to address the city's needs, and missing middle housing, in particular, is critical. Architects and design professionals, for example, are direct beneficiaries of missing middle housing. These are average earning, highly educated, working professionals. The people who design and build our city deserve to live in the places they create. Living where you work in a neighborhood of your choice at a price that is affordable should not be a luxury out of reach for most New Yorkers.

To reach Mayor Adams' moonshot goal of creating 500,000 housing units over the next decade, we need bold and comprehensive action. The challenges we are facing have no simple fix, and the zoning changes proposed in City of Yes make steps in the right direction towards achieving this ambitious goal. Right now, the name of the game is supply. In a recent study, RPA estimated the New York region has a 540,000 unit deficit, that could almost double in 2035 if housing production trends are not remedied.

Today, I encourage you to say Yes to Housing and vote in favor of City of Yes for Housing Opportunity!

Thank you!

Jim Wright, AIA Transportation and Infrastructure Committee

Introduction

My name is Jim Wright, a transportation architect and urban designer speaking on behalf of AIA New York (AIANY) in support of City of Yes for Housing Opportunity (COY-HO). My testimony focuses on two aspects of the proposed city-wide rezoning related to transit-oriented development:

- The expansion of Transit Zones city-wide which allows a modest increase in density in areas of low- and moderate-density in 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 to housing cost and production, particularly in neighborhoods outside of Manhattan with good transit access, while maintaining the basic character of those neighborhoods with compatible building types.

Transit-Oriented Development and Town Center Zoning

The expansion of Transit Zones city-wide to qualifying sites within ½ mile of transit stations is a perfect application of transit-oriented development which links land use with access to public transportation and more job opportunities. By encouraging more housing near transit stations, more people will have access to convenient transit options and in turn ridership on the public transit networks will increase.

The overlap of Transit Zones with Town Center Zones creates further opportunities to increase mixed-use housing options with access to public transit creating more cohesive, sustainable neighborhoods.

This is a win-win situation for New Yorkers city-wide who believe that more housing options and better transit service benefit us all.

Elimination of Minimum Residential Parking Mandates

You have heard very clear analyses of the cost to developers and residents when parking is provided in new residential construction. Current residential zoning in most low- and moderate-density districts requires a minimum of 1 parking space per unit. This can affect how a site is developed for new housing in several ways:

- First, providing structured parking within an apartment building drives up the associated cost to create the related apartment units.
- Second, providing parking on an adjoining parking lot or in a separate parking structure is an inefficient use of that property, further driving up the cost of the residential building itself by forcing it to be built on a smaller portion of the property. If built to its full as-of-right FAR capacity, the resultant building will be higher and more expensive to construct.
- Third, on certain small or irregular sites, residential developers will often choose to build less than the allowable as-of-right FAR capacity of the site to stay below the unit count threshold when off-street parking would be required.

These parking requirements increase the cost to build new housing and suppress the full utilization of existing zoning capacity.

An example of the flexibility of COY-HO is that this zoning provision will not prohibit a developer or builder from providing parking. They will still have that option if market conditions steer them in that direction. However, many developers will forego building costly parking, particularly in neighborhoods with good transit access, if the city is not forcing the requirement on them.

AIANY Support for COY-HO

To reinforce AIANY's support for the City of Yes for Housing Opportunity zoning reform, unlocking the potential for higher density transit-oriented development coupled with the elimination of parking mandates will create the conditions for more affordable and sustainable neighborhoods to accommodate our city's growth in the coming decades.

Darrick Borowski, AIA Housing Committee

Good afternoon, commissioners, and thank you for the opportunity to speak to you today. My name is Darrick Borowski. I'm an architect, and a member of the AIA NY Housing Committee where, along with colleagues, I have had the opportunity to study some key elements of this plan and its impacts on various neighborhoods. I also teach a design studio and research, write, and speak on the future of cities and more specifically housing, to which the future of cities is most indelibly tied.

What both my practice and academic work have reinforced time and again, is that our codes and regulations establish what is possible, and as a result (in collaboration with funding), shape what we get. The current zoning code, largely the same since 1961, has, to its credit, ushered us through a number of crises over the last 63 years, but in shaping our built environment, it has also helped shape the current housing crisis. And the possible fixes for this crisis are limited by the possibilities written into the current code. If we want to create a city where people of all incomes can afford to live (and we must first agree on this goal) then we must change the codes.

In this draft, I see proposals that enable many of the possibilities my colleagues, students, and I see as tools to help get us out of the current crisis, including bonuses for affordability, housing over retail in town centers, legalizing shared living, small apartments, and ADUs, and eliminating parking requirements. That's why I'm here in support of the City of Yes for Housing Opportunity.

I moved to New York City 20 years ago for the same reason many young people do—I was drawn to the vitality of this place; its energy, its legacy as the center of art, music, and culture. This city has seen its ups and downs, but always, it has been people who historically can least afford to live here—young people, artists, creatives, immigrants—who have kept this city vital. Those who have nothing to lose, who have the courage to leave home and reinvent themselves here, and reinvent culture, and in the process, reinvent NYC.

In my time here, I have watched housing costs skyrocket, forcing friends and fellow creatives to leave, and leaving others hanging on by a thread to an apartment they and their family have long outgrown. I have talked to young graduates who struggle to find an apartment they can afford on a starting salary in architecture and design; And mid-career architects, who, trying to start a family, must consider leaving, because even with 10 or 15 years of experience they find it hard to find a home they can afford.

Last month, I went to my community board meeting where they voted against this plan (citing quite a bit of false information sadly). I've also done a lot of listening generally to people's concerns about it, and I don't think, on the whole, New Yorkers are opposed to housing. Understandably, they/we are worried about the impacts of higher density on the already tenuous hold on our quality of life. New Yorkers are stretched thin. It takes a lot to live here. I acknowledge that we can and must tackle all those challenges as well.

But right now, we have an opportunity to make creating housing a priority, and that means changing what's possible. This plan attempts to do that, and yes it will require us to step up and face all those other infrastructure challenges as well, but this moment requires the courage to take that first step. And that's why I urge the Commission to vote yes for City of Yes.