

October 22, 2024

AIA New York Testimony to the City Council Land Use Subcommittee on Zoning and Franchises on City of Yes for Housing Opportunity

Bria Donohue, Senior Manager of Government Affairs

Good morning! Thank you, Chair Riley and members of the Subcommittee on Zoning and Franchises, 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*. Our city's housing shortage is in no small part a result of decades of restrictive zoning laws. The proposal takes an all of the above approach, making critical changes to the city's zoning to eliminate antiquated barriers that restrict development, enabling every neighborhood to do their part to build affordable housing.

Zoning changes on their own will not solve the city's housing crisis, but rather they serve as a vehicle to unlock opportunity. We urge the City Council to pass the proposal in its entirety. Each component of the proposal builds on the other to create the housing we need. Take out parking mandates, for example, and key elements of the proposal like Transit Oriented Development, Town Center Zoning, or Accessory Dwelling Units do not work. To achieve the intended impact of 100,000 units over the next 15 years, the proposal must be passed with all key proposals intact.

Architects have done robust analysis of their projects in the pipeline, and the answer is clear: this proposal meaningfully changes what is buildable enabling sites to reach the threshold of being developable and financially feasible.

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

Thank you!

Eric Goshow, AIANY Housing Committee

Thank you for giving all of us the opportunity to present our comments on City of Yes for Housing, so crucial to New York City's future. My name is Eric Goshow, Fellow of the American Institute of Architects, an active member of the AIANY Housing Committee, and Partner in my firm - Goshow Architects - where we focus on market rate and affordable and supportive housing in New York City.

First the bad news (which we all know): New York City is in the midst of a housing crisis! This is a crisis at all levels, from market rate housing to affordable and supportive and special needs housing. The Regional Plan Association has estimated that we now have a deficit of 540,000 dwelling units in New York, and that will only get worse over time. The question is: are we willing to forcefully and intelligently address this crisis for the health and future of our beloved City?

Now the good news: We have in the City of Yes for Housing an opportunity that I've not experienced since my firm was established back in 1978: a comprehensive review of New York City's zoning laws that have been in place since 1961 and are now, in 2024, long overdue for revision. Housing production has suffered as a result. Our rethinking of zoning regulations cannot be piecemeal but must be comprehensive and holistic because they are all interrelated and affect various aspects of the housing crisis, from parking requirements and density around transit nodes, to the transition of underutilized commercial structures for housing, additional dwelling units on single family lots, affordability preference, and more. It's complicated! But necessary!

On recruitment: My firm's personal experience is relevant here. We are always recruiting bright young architectural interns from universities far-and-wide. A question always is asked of us: where will I live? These bright young people are a rich asset to our firm and also to the life of New York City. They want to be here, we want them here, but housing affordability prevents many from coming.

On special-needs housing: My firm designed a project in the Bronx called PSS Grandparent Family Apartments, which is occupied by low-income grandparents who are raising their grandchildren because the children's parents are not able to provide for them. It has been estimated that there are over 84,000 such families in New York City, many in need of better, family-oriented housing.

Did you know that? Who is thinking about that particular special-needs group? Thankfully the answer is: someone! There are many different types of special housing needs that we must



address here in a compassionate New York City! Someone will be there to provide for them, provided that there is a vehicle – the enabling legislation – to make it happen. The City of Yes for Housing is that vehicle!

It is amazing and fortunate that our City's leaders, you, are looking our housing crisis directly in the eye and are developing strategies to holistically combat it. We need to likewise respond by holistically supporting this valiant effort.

Thank you!

Darrick Borowski, AIANY Housing Committee

Good afternoon, Chair Riley and Council Members, and thank you for this opportunity. I'm an architect and a member of the AIANY Housing Committee where, with colleagues, I have had the opportunity to study key elements of this plan and its impacts on neighborhoods. I also teach, research, lecture, and write on the future of cities, and housing, to which the future of cities is most indelibly tied.

What both my practice and academic work have reinforced is that our zoning codes establish what is *possible*, and as a result, help *shape what we get*. The current zoning code, written to address a very different crisis in 1961, has as had the result of *shaping* the very crisis we face now. And the possible *fixes* for this crisis are limited by the possibilities written into the code. If we are striving for a city where people of diverse incomes can afford to live, then we must change the code.

In this proposal, my colleagues, students, and I that have studied it, have found the changes proposed to be modest, but important tools to help dig us out of the current crisis, including bonuses for affordability, densifying “town centers” and transit zones, legalizing shared living, small apartments, and ADUs, and importantly eliminating outdated parking *requirements*.

I also speak as a constituent—as a small business owner and resident of Ridgewood Queens. In the last 20 years, I have seen housing costs skyrocket, forcing friends and fellow creatives to leave or hang on by a thread to an apartment they and their family have long outgrown. My students when they graduate struggle to find an apartment they can afford on a starting salary in design; And mid-career architects, who hoping to *start* a family must consider leaving, because even with 10 or 15 years experience they find it hard to find a home they can afford.

This great 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 move here, and reinvent themselves and in the process, reinvent New York City.

Understandably, New Yorkers are worried about the impacts of higher density on the already tenuous hold on our quality of life. And we must address those issues as well. But right now, we have an opportunity to *make creating housing a priority*, and that requires changing what's *possible*. That's why I urge City Council to vote yes on City of Yes for Housing Opportunity in its entirety.

John Woelfling, AIANY Housing Committee

My name is John Woelfling. I am here to speak in favor of City of Yes as much needed reform for the future of our City to be more equitable and make room for the next generation of New Yorkers.

I am an Architect that specializes in affordable housing at Dattner Architects. I work with both for-profit and not-for-profit developers on all-affordable and mixed-income projects throughout the City.

I have worked on housing projects that were limited by FAR, by height, and by parking. I've also worked on projects that provide more parking than required by current zoning because that's what the developer knew would result in a successful project. One of those projects is being built right now in Queens.

My firm has worked a great deal with HPD and I am very proud of the all-affordable buildings that the City has helped create. However, every time one of our buildings goes live on the Housing Connect lottery, the demand far outstrips the supply.

I am also a Brooklyn resident that has lived in the same medium density district near Prospect Park for the past 25 years and I've recently served on my Community Board and seen first-hand some of my neighbor's concerns about the City changing.

We have also seen middle class families leaving the City for other affordable housing options. This troubling fact that we are not making room for the next generation of residents to stay and place roots in their communities is a losing proposition.

So it's clear to me that we have a supply problem.

In addition to my professional opinions, this is also personal. As much as I love my children, I don't want them to live with me as young adults. I want them to be able to find a place of their own, and I don't see how they can do that with the current lack of housing options.

City of Yes is a comprehensive proposal that allows each neighborhood to help. Pulling the proposal apart to exempt high, medium or low-density districts from the changes will result in the persistence of inequalities.

I applaud the Council for recognizing that zoning reform alone cannot fix this housing shortage that has been decades in the making. It will take time to fix, but if we don't start now, when will we?

A "No" vote on City of Yes will result in the current pressures and inequities to persist.

Thank you for your time.

Marc Pittsley, AIANY Housing Committee

Good evening! My name is Marc Pittsley and I am an architect with 23 years' experience working here in the city, mostly on apartment buildings, both market rate and affordable. I am testifying today in favor of the City of Yes proposal, because we desperately need every tool to incentivize the construction of more housing in this city.

Specifically, I wanted to say a few words regarding mandatory parking requirements. As a designer, I have seen firsthand how these requirements place costly constraints on a new building. For example, structural column locations that are necessary for maneuvering cars are never as workable for the apartments above them, requiring expensive transfer beams. And the limits on where parking can be placed without it counting as floor area mean that deep excavation is often the only option, imposing hefty costs in waterproofing and in shoring up vulnerable neighboring buildings.

But I am also speaking to you today as a homeowner who has now seen firsthand the consequences of these mandates for building residents. I live in Crown Heights, in a 163-unit building where the developer had to accommodate a parking requirement for 66 cars. To avoid excavating two stories below grade, the developer provided a single level of parking in the cellar using double-height car stackers and tight clearances. The assumption was that an attendant would be hired, since less than half of the spaces can be reached without moving other cars. But there was never enough demand to sell enough spaces to make the cost of hiring an attendant feasible. Now this amenity has become an albatross for the owners in the building, including myself. We are unable to hire an attendant; we are unable to sell more spaces without an attendant, and we are unable to rent spaces to outside neighbors. So, years after completion, the garage sits more than half-empty. Empty, expensive, wasted space in a city where every inch is precious.

I am asking the council to approve the City of Yes, to prevent this kind of waste. Parking mandates can cause headaches for homeowners and residents long after the developer and the architect have left the scene. Let parking be determined by market forces, not by arbitrary zoning formulae.

Thank you.

Jim Wright, AIANY Transportation and Infrastructure Committee

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.

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.

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.

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.