

Chair Amanda Burden
New York City Department of City Planning
22 Reade Street
New York, NY 10007

January 14, 2008

Dear Chair Burden,

On behalf of the American Institute of Architects, New York Chapter, and its over 4,000 architects and public members, we are writing to support the Department of City Planning in its Greening Initiatives. The Department's most recent proposals to amend the Zoning Resolution would require the planting of street trees and increased yard area for new buildings and extensive renovations in all five boroughs.

AIA NY has strongly supported the aims of PlaNYC since Mayor Bloomberg introduced the plan last spring. Street trees are an important part of greening New York; they provide shade, help improve air quality and stormwater drainage, and enhance urban street design. This zoning amendment is a straightforward way to reach the goals of "Million Trees NYC," and provides a mechanism for continuing tree planting for years to come, beyond 2030.

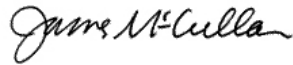
In thinking about the impact that these proposed amendments will have on the streetscape of New York, we have some comments that come out of our practice as architects. On the small scale, we suggest that the regulations on front yard planting should take into consideration adequate space for garbage and recycling receptacles. We also suggest that grass strips, and not just tree pits, should be allowed in less dense portions of R6 districts, as this can often work well in these neighborhoods (one example is Jackson Heights in Queens).

In this proposal, the cost of planting a tree will be placed on the developer and architect. We estimate the cost at between \$500 and \$1,000, which, in a small or low budget project, is not insignificant. To avoid adding costs to housing development beyond this amount, we strongly advocate that the planting processes specified in the text of the amendment be streamlined, and allow for exemptions in cases where planting trees causes undue burdens. For example, projects built fronting on significant existing vaults or subways should perhaps be exempted. We would also suggest that the Commission investigate exempting HPD projects and projects that aim to build affordable units from this rule. Any barrier to affordability, even a slight one, is problematic.

A major comment is a realization of zoning's inherent limitations as a tool in achieving the city's green objectives— for which the proposed regulations are necessary but not sufficient. Especially with the street trees amendments, equitable and effective administration and enforcement will make the difference between concept and reality. A special interagency policy involving the Department of Buildings and the Department of Parks should assign implementation duties, and adequate funding, to the entities best suited and staffed for the particular task

Thank you for allowing us to weigh in on these important zoning text amendments.

Sincerely,



James McCullar, FAIA
2008 President, AIA New York Chapter



Fredric Bell, FAIA
Executive Director