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Carl Weisbrod, Chair  
New York City Commission of City Planning  
22 Reade Street  
New York, NY 10007

re: Zoning for Quality and Affordability Text Amendment Proposal, CEQR NO. 15DCP104Y

Dear Chair Weisbrod:

Thank you for the opportunity to testify in regard to the Zoning for Quality and Affordability Text Amendment Proposal. We have listened attentively to the presentation of the proposal and the lively discussion about its implication for the City of New York and its neighborhoods. In addition we have read and analyzed the 24 specific tasks and proposed actions in the 153-page Scope of Work document, [http://www.nyc.gov/html/dcp/pdf/env\\_review/zoning-qa/draft\\_scope.pdf](http://www.nyc.gov/html/dcp/pdf/env_review/zoning-qa/draft_scope.pdf).

On behalf of the New York Chapter of the American Institute of Architects, and our 5,500 architect and associate members here in New York City, we would like to offer the following thoughts and observations in support of its key concepts. There is an increasing and unremitting demand for housing in our city, across all five boroughs and for New Yorkers of all income levels. The need is greatest for those with limited financial resources. Affordable housing can be built if the economics work, starting, as the text amendments say, with better understanding of contemporary building practices, shifting patterns of automobile ownership, along with irregular lot conditions and demographic changes. As architects living and practicing in New York, we are keenly aware of the impediments resulting from overly stringent building envelope and design constraints, obsolete use regulations and parking requirements that significantly increase the cost of housing. We commend the Department of City Planning for proposing text that helps facilitate the development of new housing, and in particular, the drafting of new language that helps achieve the Administration's goals for the creation of new affordable housing.

### AGING IN PLACE:

The Design for Aging Committee of the AIA New York Chapter has been working closely with DCP staff on the concepts and language that allow for an increasingly age-friendly city, where "aging in place" becomes more than a catch phrase and begins to be codified in ways that allow senior citizens, and particularly those on fixed incomes, to stay in their communities. Issues of housing type and unit size, to start with, are positively addressed in the proposed zoning text amendments.

### BUILDING HEIGHT:

As architects we know that in addition to unit size, residential structures have also changed in floor-to-floor height as a result of different types of construction, including "block and plank" and modular or pre-fabricated technologies. Higher ceiling heights also generally create better apartments with enhanced environmental characteristics including more natural light. The proposed text amendments allow for greater flexibility in design and construction without a radical increase in building height. This brings down costs while also increasing quality. Of course, it is our shared understanding that existing height limits continue in historic districts.

**PARKING:**

New York is fortunate to have the best public transit system in the country. The vast majority of New Yorkers navigate our city, get to work or school, visit family and friends, using our extraordinary existing subway and bus systems. The expansion of Select Bus or bus rapid transit routes to neighborhoods less-well served by surface transit is also a game-changer, redefining the possibilities of transit-oriented development. Further diminishment of unnecessary use of cars is consistent with Administration policy of reducing carbon emissions by 80% by the year 2050. The AIA has embraced this call for environmental action and at AIANY we have been suggesting for a decade that reducing unnecessary parking requirements is also a way of reducing housing costs and creating more dwelling units.

**BUILDING GEOMETRY:**

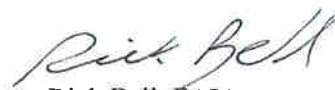
Neighborhood character in New York is often and best expressed by a lively interaction of buildings from different eras characterized by an eclectic mix of style, height and massing. Brownstones sit adjacent to mid-rise structures. Larger buildings are mixed in with smaller ones. Zoning sets the limits, but not for our neighborhoods the uniformity and homogeneity of a mandatory height restriction. That said, there are many oddly-shaped or corner sites where the existing development potential is precluded by setback or side yard requirements that preclude the full build-out of to otherwise allowable floor area limits. The proposed zoning text amendments start to address these variations, and the possibility of increasing housing availability by understanding that one size doesn't fit all.

As has been said in a variety of metaphors, it is the details that matter. Other organizations have raised questions about potential diminishment of contextual zoning and raising of height limits. We look forward to a vigorous debate informed by case study analysis about the potential impact of changes permitted by the text amendments. To this end we are organizing a public forum and continuing our discussions with our colleagues at AIA Brooklyn, AIA Queens, AIA Staten Island and AIA Bronx. We congratulate the staff at the Department of City Planning for bringing these proposed text improvements to public debate, and look forward to seeing their adoption - after more discussion - by the City Planning Commission.

Yours truly,



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President, AIA New York



Rick Bell, FAIA  
Executive Director, AIA New York

cc: Jeff Shumaker, Department of City Planning; Ida Galea, AIA, President, AIA Brooklyn; Willy Zambrano, AIA, President; AIA Queens, Jeff Geary, AIA, President, AIA Staten Island; and Carlo Nuzzi, AIA, Past-President, AIA Bronx.