

Chair Dan Garodnick  
City Planning Commission  
120 Broadway  
New York, NY 10271

February 7, 2024

**RE: AIA New York Testimony to the City Planning Commission in Support of the Green Fast Track for Housing**

Dear Chair Garodnick,

American Institute of Architects New York writes to express our support for the proposed amendment to Chapter 5 of the City Planning Commission's rules to exempt certain housing and related actions from review under SEQRA and CEQR procedures, also known as the Green Fast Track for Housing. AIANY represents more than 5,000 architects and design professionals committed to positively impacting the physical and social qualities of our city.

With the housing crisis in NYC raging on, the Green Fast Track for Housing will make important changes to address the lengthy and costly environmental review process. Among the many costly factors to building housing in NYC, the time and resources required to complete environmental reviews that are ultimately unnecessary can potentially derail a project. The proposed rule changes will make commonsense adjustments to the environmental review process to streamline the process for climate-friendly housing by up to 24 months and save each project approximately \$100,000. Eligible projects are housing that uses all-electric heating instead of fossil fuels, are located outside of vulnerable coastal areas, in areas with industrial emissions or away from major roads, and that meet specific mitigation standards for areas with hazardous materials or in ambient noise.

The Green Fast Track for Housing will be a valuable tool for achieving the city's goal of building 500,000 new homes by 2033. Housing production has lagged far behind job growth, with housing increasing by 4% compared to 22% job growth in the same period. This proposal will be critical to breaking down some of the barriers to building housing and start delivering quicker for New Yorkers.

AIANY urges the City Planning Commission to approve the proposed amendment, Green Fast Track for Housing, and get New York building housing faster.

Sincerely,  
Jesse Lazar, Executive Director

## Notes

- NYC is facing a crippling housing crisis which has real and direct human consequences, including high rents, displacement pressure, segregation, gentrification, poor housing quality, tenant harassment, homelessness, and other effects of a market where residents have very limited options because of housing scarcity.
- Almost every hardship of the city housing market can be traced back to an acute shortage of housing.
- The housing shortage drives up prices for everyone.
- Among the factors contributing to the city's housing crisis are the time and resources required to complete environmental reviews that are ultimately unnecessary because they consistently result in determinations that the proposed developments have no potential for significant adverse environmental impacts.
- To address the lengthy and costly environmental review process, the city agencies that develop or approve housing, including NYC Planning Commission, are each adopting a new Type II rule under SEQRA and CEQR to exempt housing developments up to a certain size from further environmental review. Type II actions are agency actions that will not have a significant impact on the environment review. Type II actions are agency actions that will not have a significant impact on the environment as determined by certain criteria established by SEQRA, and are therefore exempt from environmental review. 6 NYCRR Section 627.5. Exempting these projects from review under SEQRA and CEQR will decrease their overall cost and shorten the time typically needed to complete the approval process, resulting in delivery of new homes faster to residents that need housing today.
- Based on this analysis of past environmental reviews, the Commission has concluded that housing developments of up to 250 new units in higher and medium density districts and up to 175 new units in lower density districts that meet certain other density related and site specific criteria do not result in significant adverse impacts.
- The commission proposes to amend its existing Type II rule to add a new Type II category for projects that would facilitate new housing that meet the criteria in this rule.
- These proposed rules will reduce the time and resources needed to obtain CPC approval for new housing projects.
- The city's existing environmental review process can cost hundreds of thousands of dollars and take up to several years to complete. To expedite this process, the city plans to synthesize the review process by up to 24 months for certain types of homes, which based on a study of over 1,000 environmental reviews over the past 10 years, have had no environmental impact.
- Those projects include housing that, among other restrictions, uses all-electric heating instead of fossil fuels, are located outside of vulnerable coastal areas, in areas with industrial emissions or away from major roads, and that meet specific mitigation standards for areas with hazardous materials or in high ambient noise.
- Other restrictions include limiting qualifying proposals in low density areas to fewer than 175 units and take up less than 20,000 square feet of nonresidential area. In medium and high-density residential areas and commercial or manufacturing districts, projects must have fewer than 250 units and take up less

than 35,000 square feet of nonresidential area. Additionally, projects that are over 250 tall or over 50 tall and next to open space, natural resources, or historic resources that are “sunlight sensitive” are excluded from. Projects requiring rezoning would still go through the ULURP process, and projects in historical districts would continue to require Landmarks Preservation Commission oversight.

- The proposed rule will streamline environmental review by up to 24 months and save each project approximately \$100,000. The city estimates that if the proposed rules had been in effect over the last 10 years, approximately 12,000 housing units could have been built more quickly.
- NYC Mayor Adams and NYC DCP Director and CPC Chair Dan Garodnick today unveiled the “Green Fast Track” – a streamlined environmental review process to accelerate the production of small and medium-sized housing projects across NYC. A major initiative of the administration’s “Get Studd Built” plan to create more housing by cutting red tape, streamlining processes, and removing bureaucratic obstacles, the Green Fast Track will help achieve the city’s housing and climate goals by making it easier for modest, climate-friendly housing projects to proceed through environmental review.
- In exploring the potential for a Green Fast Track, city planning and environmental experts analyzed more than 1,000 environmental reviews over the last decade, consistently finding that modest housing projects with certain characteristics “Type 2” actions under the City Environmental Quality Review process – the city will reduce redundant or unnecessary processes for projects of a certain size and speed up environmental review by as much as 24 months, saving each project an average of \$100,000 and quickly delivery urgently needed housing. By adjusting eligibility requirements to include sustainability measures – such as all-electric heating – the city can also leverage the environmental review process to accelerate its climate goals.
- The extensive, existing environmental review process can take up to several years and cost hundreds of thousands of dollars to complete. Proposed by the administration at today’s CPC meeting, the new environmental review process rules had been in effect over the last 10 years, approximately 12,000 new housing units could have been built more quickly and efficiently.
- To qualify, projects must:
  - Use all-electric heating instead of fossil fuel
  - Be located outside of vulnerable coastal areas, areas with industrial emissions, or away from major roads
  - Meet specific mitigation standards for areas with hazardous materials or in high ambient noise
- In low density residential areas, qualifying proposal must have fewer than 175 units and take up less than 20,000 square feet of nonresidential areas. In medium and high-density residential areas and commercial or manufacturing districts, projects must have fewer than 250 units and take up less than 35,000 square feet of nonresidential area.
- The Green Fast Track also excludes projects over 250 feet tall or over 50 feet tall and next to open space, natural resources, or historic resources that are sunlight sensitive.
- To meet the mayor’s “moonshot” goal of building 500,000 new homes by 2033, the Adams administration alongside city planning commission chair Dan Garodnick announced a new program: Green Fast Track.
- City officials say that researchers analyzed 1,000 environmental reviews from the past decade. The study revealed that most housing projects with specific characteristics of modest size had no negative impacts on the environment. Moving ahead, similar buildings will be designated with city officials call “Type 2” under CEQR process. If building developers achieve Type 2 status, city officials say, it could cut their

permitting time by 24 months, and save an average of \$100,000 while quickly delivering much needed housing.

- In order to qualify, the projects must: use all-electric heating, rather than fossil fuels; be located outside sensitive coastal areas; be distant from major roads and highways; and utilize pre-determined mitigation standards for areas with hazardous materials or in high-ambient noise.
- The idea of streamlining new housing comes as the city deals with a major shortage in housing units – leading rental prices in NYC to be among the highest in the nation.
- Since 2010, the housing stock in NYC has increased just 4%, which compares with the 22% increase in residents holding jobs in the city.