

December 16, 2015

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

Dear Chair Weisbrod,

The American Institute of Architects New York Chapter represents over 5,000 architects and design professionals, and is committed to positively impacting the physical and social qualities of our city, while promoting policies beneficial to the welfare of our members. We have reviewed the Department of City Planning's Zoning for Quality and Affordability (ZQA) proposal and believe these revisions will help facilitate the construction of affordable and senior oriented housing, offer architects more flexibility to create better buildings more responsive to local contexts, spark the development of many surface parking lots and empty lots with irregular dimensions, and decouple the creation of housing from parking requirements, thereby encouraging the use of mass transit and enabling a more sustainable city. The proposed zoning text amendments can improve the city's built environment and streetscapes for many New Yorkers, advance projects that support a livable city, and increase economic activity within the architecture, engineering, and construction markets, bolstering the creation of jobs.

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With the modest height adjustments, removal of rear yard setback requirements, the addition of more flexible outer court and street wall location rules, and the availability of greater lot coverage on corner lots, the proposal promotes the following beneficial outcomes:

- **More retail spaces in commercial districts.** A higher ceiling, at the ground floor allows for retail at the base without giving up rental units in buildings with sufficient floor area;
- **Better residential spaces with adequate ceiling heights.** An increase in building height allows for additional ceiling heights, encouraging more light and air in residential units;
- **Increased security and privacy for residents.** Raising the floor above the sidewalk for ground floor dwelling units separates them from the street;
- **Affordable housing in districts that receive inclusionary housing bonuses.** Sites that receive a floor area bonus can now build that area within a modestly increased zoning envelope. Flexibility in building envelopes will make it easier to utilize inclusionary housing, and flexibility at the base of buildings promotes better buildings, streetscapes, and communities;
- **Aging in place.** The senior population is increasing dramatically in NYC, and many seniors want to stay in their neighborhoods. By encouraging more dedicated senior buildings in low- and high-density districts, ZQA takes a progressive step forward to create a city that allows for aging with dignity. Further, the additional height opposite major infrastructure will enhance the quality of the housing;
- **Visual variety and resurgence of features common in traditional and historic apartment buildings.** The proposed text amendments allow for greater flexibility in design and construction without a radical increase in building height. For example, front courts not only improve the street-scape but improve natural ventilation. Neighborhoods throughout the city exemplify architectural diversity, which ZQA continues to encourage;
- **Reduction in unnecessary parking requirements to reduce housing costs and create more dwelling units.** Parking lots, especially at senior buildings, are largely underutilized and could instead provide additional apartments, community spaces, or outdoor amenities. If the City's public transportation expands as proposed, greater housing density could be realized without the traditional corresponding increase in parking provisions;



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- **Relaxed density caps and minimum apartment size.** The flexibility provided by the proposal will allow for the creation of more compact unit housing, as well as a variety of housing types, to accommodate the City's changing demographics;
- **Better site planning and architectural design.** The lowering of the minimum distance between buildings will substantially increase the site planning possibilities, including when there are multiple buildings on the same site. In addition, the change in courts will facilitate better apartment planning with greater possibilities through ventilation.

We believe these very positive outcomes justify the limited increase in building heights proposed in most districts.

As the review of the ZQA amendments continues, we hope you, the City Planning Commission, Community Boards, and individual Council Members will review the amendments to understand how they may impact individual districts and other City policies. Specifically, we believe more discourse should be given to the following:

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- **Public education**
- **Street wall height increases in contextual zoning districts**
- **Budgeting for infrastructure**
- **Sustainability**
- **Current mapping of residential and mixed use districts**

Over the last eight months, we have participated in lively discussions about ZQA and its implications for NYC's neighborhoods. In addition, AIANY has taken a lead in educating the design community and the public on how the changes will lead to better buildings and communities. We have hosted public programs with DCP at the Center for Architecture to inform the design community about the upcoming changes; organized a charrette-style working session to analyze and illustrate the ways the amendments will alter the way we design buildings; solicited input from architects in all five boroughs; compiled case studies to show how the zoning changes will improve senior housing development, create more dynamic building envelopes, and improve streetscapes; met with Council Members representing a diverse range of districts to discuss the benefits of ZQA and how their neighborhoods will be affected; and spread the word through publications, articles in our e-newsletter, and mentions in social media outlets.

Zoning for Quality and Affordability facilitates improved housing design by allowing architects to achieve the floor area currently permitted but now limited by height and other envelope restrictions. ZQA eliminates these artificial barriers and increases flexibility to achieve the permitted zoning capacity while encouraging better and more contextual designs. We support the advancement of these amendments through the review process.

Sincerely,

Tomas Rossant, AIA
President, AIANY