

March 25, 2015

STATEMENT OF THE NEW YORK LANDMARKS CONSERVANCY AT THE PUBLIC SCOPING MEETING REGARDING THE PROPOSED DRAFT SCOPE OF WORK FOR THE PREPARATION OF AN ENVIRONMENTAL IMPACT STATEMENT FOR THE ZONING FOR QUALITY AND AFFORDABILITY TEXT AMENDMENT

Good day Chair Weisbrod. I am Alex Herrera speaking on behalf of the New York Landmarks Conservancy. The Landmarks Conservancy is a private, independent, not-for-profit organization, founded in 1973. Our mission is to preserve and protect historic resources throughout New York.

First, we'd like to thank the City Planning Department staff who briefed us on this proposal. We understand that the plan is, in part, responding to concerns raised by some architects and developers about the ability to use full FAR in contextual districts. However, this is a massive response to a problem that might be answered with more tailored approach. There is also no backup data to show how the proposal would improve either quality or affordability.

The proposal will have an impact on the many hard won contextual districts across the boroughs. It will also affect City-designated historic districts, State and National Registers of Historic Districts, areas currently under study for designation, and districts eligible for listing on the State and National Registers. We request that the environmental impact statement provide information on all of these impacts, showing them on maps and measuring potential development pressures.

Furthermore, as a policy issue, we are concerned that if passed, the proposal will put undue pressure on the Landmarks Commission to approve additions and new construction in historic districts that are out of scale with surrounding buildings. This would negate the protections of the district designation, and add pressure to slow down district designations.

It is certainly true that there are buildings going up today within and outside of contextual districts that are not high quality. The proposal will make some improvements by allowing for new setback requirements, encouraging courtyards, and adding flexibility for irregular lots. However, it's not clear that these proposals will improve quality as much as they will just allow for taller buildings. Construction methods evolve. You are basing part of this proposal on block-and-plank construction, which is currently used to lower construction costs. It seems impractical, however, to alter zoning for decades based on one construction technique that will likely be replaced in coming years.

This proposal is the first of many that will rezone large areas of the city and dramatically change neighborhoods. This is all being done with the stated goal of increasing affordable housing. But this proposal also allows increased height for market rate housing. There needs to be an analysis of the numbers of new market rate and affordable units this might create versus the numbers of stabilized, affordable, less expensive existing units that could be lost due to demolition.

We are concerned that this plan is moving through too rapidly, with changes for the entire City, in much less time than any one of these neighborhoods had to work to gain contextual zoning. It is worth emphasizing that residents in areas throughout the City demanded contextual zoning. These areas contain and maintain housing for multiple income levels. Existing contextual districts are tailored block by block, and have been crafted with careful study over years, but this proposal applies a broad brush approach. We would like to see separate analysis of effects on all contextual districts, instead of handful of prototype examples.

Thank you for the opportunity to express The Landmarks Conservancy's views.