

February 21, 2019

**STATEMENT OF THE NEW YORK LANDMARKS CONSERVANCY BEFORE THE MANHATTAN  
BOROUGH BOARD REGARDING THE PROPOSED RESIDENTIAL TOWER MECHANICAL VOIDS  
TEXT AMENDMENT, N190230 ZRY**

Good morning Borough President Brewer and representatives of the Manhattan Community Boards. I am Peg Breen, speaking for the New York Landmarks Conservancy.

The Conservancy is pleased that the Department of City Planning has heard the voices of elected officials, advocates, and residents from across the City, who have seen out-of-scale, out-of-context buildings rise in their neighborhoods. These towers bend the intentions of the Zoning Resolution with voids, stilts, and gerrymandered or sculpted zoning lots, among other loopholes.

City Planning has recognized some of the most egregious examples by putting forth a text amendment that limits excessive mechanical voids in residential buildings in some communities. This amendment is a welcome first step, which we hope you support. But the agency needs to do more.

City Planning has promised to come back later this year to expand the area that the amendment covers. We believe they should expand the mandate. It should include commercial as well as residential buildings. It should be City-wide. It should look at all of the ways that developers manipulate zoning to boost building heights such as multiple voids, stilts, outdoor spaces and patios and count them against FAR.

The current amendment will take action against one specific tactic. We urge you to press City Planning to come back with a more holistic amendment that creates comprehensive certainty and predictability in zoning.

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