

Broadway Community Alliance

City of Yes - Housing Comments

November 6, 2023

Ms. Stephanie Shellooe, AICP Director Environmental
Assessment and Review Division New York City
Department of City Planning 120 Broadway, 31st Floor
New York, New York 10271

Via email to: 24DCP033Y_DL@planning.nyc.gov

Dear Ms. Shellooe:

This is in reference to the Draft Scope of Work, Environmental Assessment Statement, Positive Declaration and Scoping Protocol, **City of Yes for Housing Opportunity CEQR No. 24DCP033Y**.

Please accept the following comments from the Broadway Community Alliance. We are an all-volunteer civic association representing renters, cooperatives, and home owners. Formed in 2011, our members are concerned with quality of life issues along the Broadway Corridor and environs in North Riverdale and Van Cortlandt Park, Bronx NY.

1. The proposed action applies uniformly across the city in zones R1 through R 10. But many areas of the five boroughs have been identified in studies as low-lying flood and erosion prone areas. Provide an analysis of the cumulative effect of the proposed action on those designated areas in R1 through R 10.
2. Analyze the cumulative environmental impacts of the proposed action on infiltration of storm water from reducing the current Open Space Ratio in R1 to R5 districts. Quantify potential effect of the proposed action on the city's efforts to reduce Combined Sewer Overflow (CSO) as per state and federal mandate.
3. Quantify potential environmental effects of proposed action (ADU housing on 50% of private property, reduced or eliminated side, rear, front yard requirements, increased FAR and Infill measures, etc.) that will replace grass and mature trees with buildings in low-density zones.
4. The proposed reduction in minimum lot sizes and lot widths, especially in R1-1 Districts where they would be halved, would significantly affect neighborhood character.
Task 19 of the scope, Neighborhood Character, should evaluate this impact.
5. Analyze the environmental and health impacts of the proposed Infill action on residents and children from reduced open space in NYCHA, Mitchell-Lama, and other subsidized developments. Additionally, thousands of NYCHA units remain unrented due to necessary repairs. Provide data on the feasibility of returning these units to the rental market.

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6. Conduct an analysis to measure and analyze the relationship between the proposed action and additional changes to impermeable surfaces citywide, as well as changes to CSO, flooding, and CO² levels due to loss of mature trees.
7. Analyze and provide the cost for additional funding necessary to serve increased population growth in low density areas i.e., upgrades to antiquated infrastructure such as water, sewer, electric lines, and delivery of city services schools, transportation, police, fire, emergency services, sanitation etc.
8. Provide analysis on environmental impacts regarding flooding, erosion, and delivery of city services in R6 to R IO districts after ZQA zoning changes were enacted. Quantify any mitigation efforts.
9. The proposal Transit-Oriented Development in would apply to bus stops in the outer boroughs as well as subway and commuter rail stations. Bus stops can, and are, easily moved when routes change. Many places served by multiple bus routes are far from subways. Bus stops should not be considered infrastructure.

Thank you for this opportunity to comment. I am looking forward to your response.

Yours truly,

Laura Spalter, Vice Chair

Lsrca1@aol.com

917-969-8205

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bdwayalliance@gmail.com