

The CEQR Technical Manual says it all. In the case of the Housing Opportunity Zoning Text changes, the purpose and the need for the public policy, such as creating housing that is affordable for those making the mean income in the City.

See Section 210. PURPOSE AND NEED FOR PUBLICLY AND PRIVATELY SPONSORED ACTIONS of the CEQR TECHNICAL MANUAL states:

“The purpose of and need for the project should be explained clearly at the beginning of the EAS or EIS, allowing the decision-makers to balance the goals of the project with environmental concerns, if any, in determining whether the project should be approved. For city-sponsored projects, this statement of objectives or purpose should be framed in terms of how the project meets public needs and responds to public policies, such as the provision of affordable housing, . . .”

We have been told that is a “housing crisis” and that we need builders to create more luxury housing to spur on lowering rents in the affordable range. Survey says it isn’t so. Survey says that 8.89% of the total. Based on the information in the 2023 HPD Housing Survey, the 2 million rental units have 30,000 vacant apartments for a vacancy rate of 1.4%. But this does not count the 330,000 market rate units that are too expensive to rent for the groups that are rent burdened.

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That is, the New York City public policy is to create a little bit of low and median rent affordable housing in every neighborhood. In the last nine years, developers built 101,236 homes with new or extended (preserved) affordability requirements for income restricted. (17,260 new and 19,357 preserved housing for those making less than 30% AMI, and 9,933 new and 54,696 preserved for those making less than 50% AMI). That is 11, 248 per year.

At the CPC certifying the Environmental Review, they estimate a citywide housing unit increment range to be 58,000 to 108,000 units in 15 years. This raises at least two questions: What is the actual need for this, and two, did they present a low estimate in order to have no impact on the most series categories, like Land Use, Water and Sewer infrastructure, Solid Waste? You get the idea.

The purpose of the proposal is to increase rental housing that is affordable for those making less than 30% AMI (304,125) and/or less than 50% AMI (344,072). The need is established by the **Total housing lottery applications 27,261,057** for new buildings, homeless persons in a shelter (45, 319), and a high level of evictions by a marshal (67,431).

**Conclusion**

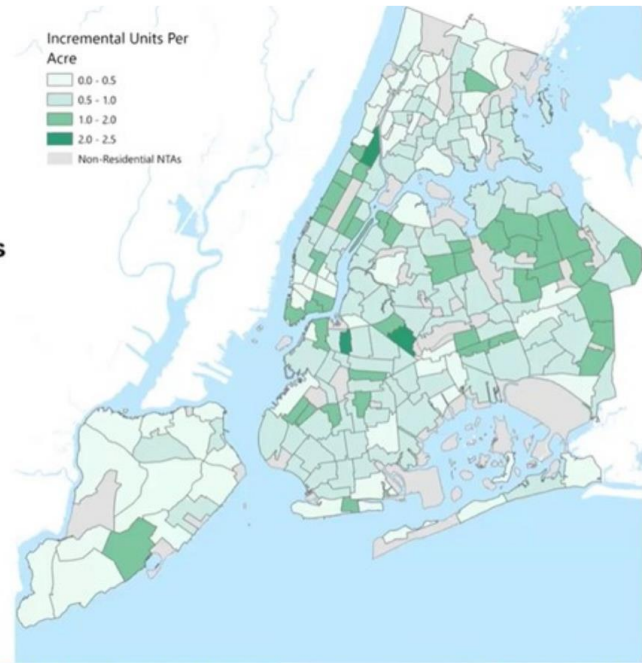
**Environmental Review**

A little more housing in every neighborhood:

- The EIS estimates on average a **little less than 1 unit per acre over 15 years**

The results:

- The EIS estimates a citywide housing unit increment range of **58,200 to 108,900 units**



**Conclusion**

**Environmental Review**

A Notice of Completion of a Draft Environmental Impact Statement (DEIS) was issued on April 26, 2024

The DEIS identifies no impacts in these categories:

- Land Use, Zoning, and Public Policy
- Socioeconomic Conditions
- Water and Sewer Infrastructure
- Solid Waste and Sanitation
- Energy
- Greenhouse Gases and Climate Change
- Air Quality
- Public Health
- Neighborhood Character

The DEIS identifies potential for "significant adverse impacts" in these categories:

- Community Facilities and Services (early childhood programs, schools)
- Open Space
- Transportation (traffic, transit, pedestrian)

The DEIS could not preclude impacts in the following categories because their likelihood depends on specific site characteristics: Shadows; Historical & Cultural Resources; Urban Design and Visual Resources; Natural Resources; Hazardous Materials; Noise; Construction.

*No other significant adverse impacts were identified. Mitigation measures are identified in the DEIS and will be detailed in the Final Environmental Impact Statement (FEIS).*