

By their own admission, Mayor Adams and the Department of City Planning's proposed City of Yes for Housing Opportunity (COYHO), is a massive deregulatory program with the ultimate goal of create massive increases in density in currently low-density neighborhoods. All of the proposals in this 1386-page package will do serious damage to not only our neighborhoods in Community Board 5 but communities throughout the city. **Note: Even if you like one or more of the proposals, VOTE NO, because any YES – even with conditions – is considered a YES, PERIOD. COYHO must be rejected in full.**

Here are short responses to each of the 15 proposed actions:

1. Town Center Zoning – *Re-introduce buildings with groundfloor commercial and two to four stories of housing above, in areas where this classic building form is banned under today's restrictive zoning. (See accompanying DCP map on page 18)*

This proposal would allow multiple floors of apartments on top of *every* commercial building (or a new three to five floor building with commercial on the ground floor) in every commercial overlay in all R1 to R5 zones, dramatically increasing FAR and density with no parking requirements AS-OF-RIGHT and taking away the ability for the community and councilmember to decide whether the development is appropriate by removing the ULURP process. Note: This proposal is one of the key components to City of Yes for Housing Opportunity and described as “Missing Middle Housing,” more propaganda by Mayor Adams and the DCP to minimize its devastating effect on lower-density communities ! Reject!

2. Transit Oriented Development – *Allow modest, three-to-five story apartment buildings where they fit best: large lots within a half mile of subway or Rail stations that are on wide streets or corners. (See accompanying DCP map on page 20)*

This proposal would allow new three to five floor apartment buildings in all areas covered by the proposed Transit Zone (which covers approximately 50% of CB11), dramatically increasing FAR and density with no parking requirements AS-OF-RIGHT and taking away the ability for the community and Councilmember to decide whether the development is appropriate by removing the ULURP process. Note: This proposal is specifically geared to allow apartment buildings in current one and two-family zones and is one of the key components to City of Yes for Housing Opportunity and described as “Missing Middle Housing,” more propaganda by Mayor Adams and the DCP to minimize its devastating effect on lower-density communities! Every property 5,000 square feet or larger on a wide street (75'+ wide) and every “corner” on a narrow street – including multiple smaller properties purchased by a developer and assembled to meet that 5,000 square feet minimum – would be eligible. Reject!

3. *Accessory Dwelling Units* – Permit accessory dwelling units such as backyard cottages, garage conversions, and basement apartments.

This proposal would allow at least one additional unit on every current one and two-family property in New York City and would affect more than 40% of properties in CB11. Citywide, this proposal is the lynchpin of making all current one and two-family zones a minimum of de facto three-family zones. Besides what is mentioned above, ADUs also include attics and cellars, and the backyard “cottage” is up to 800 square feet in size and can cover up to 50% of your backyard. **Note:** This proposal is specifically tied to the “District Fixes” proposal below, which will automatically increase density and take away light, air and green space in all R1 through R5 zones by dramatically increasing FAR (Floor Area Ratio), Lot Coverage and Building Height, while shrinking minimum lot size, lot width and side and rear yards – and take away all parking requirements. This would all be AS-OF-RIGHT and is a key component of City of Yes for Housing Opportunity. DCP describes this proposal as ‘gentle density’ which is more propaganda from Mayor Adams and the DCP to minimize its devastating effect on lower-density communities. **Reject!**

4. *District Fixes* - Give homeowners additional flexibility to adapt their homes to meet their families’ needs.

This proposal will automatically increase density and take away light, air and green space in all R1 through R5 zones by dramatically increasing FAR (Floor Area Ratio), Lot Coverage and Building Height, while shrinking minimum lot size, lot width and side and rear yards – and take away all parking requirements. This particular proposal would create permanent changes to the basic regulations that guide all residential development. This would all be AS-OF-RIGHT and is a key component of City of Yes for Housing Opportunity. The term “District Fixes” is more propaganda from Mayor Adams and the DCP to minimize its devastating effect on lower-density communities, particularly when **the vast majority of housing units in lower-density and contextually zoned areas are currently in compliance with existing regulations.** **Reject!**

5. *Universal Affordability Preference* – Allow buildings to add at least 20% more housing if the additional homes are permanently affordable. This proposal extends an existing rule for affordable senior housing to all forms of affordable and supportive housing.

This proposal will affect all of the R6 and above zones in CB11. This proposal does not **mandate** additional affordable housing in high density zones; it was introduced to try to “balance” the complete focus of destroying lower-density neighborhoods. **Reject!**

6. Lift Costly Parking Mandates – Eliminate mandatory parking requirements for new buildings. Parking would still be allowed, and projects can add what is appropriate at their location.

This proposal is simply outrageous. The publicly stated reason for this proposal is that A) if you don't build parking, it will encourage more people not to drive and B) it will create more housing units. Simply put, any development without parking mandates will increase parking issues in all communities, low or high density. In addition, this is clearly a giveaway to developers, who will no longer be required to build parking that costs them \$50,000 to \$70,000 per parking space, allowing them to pocket additional profits. **Reject!**

7. Convert Non-Residential Buildings to Housing – Make it easier for underused, nonresidential buildings, such as offices, to be converted into housing.

Following the City of Yes for Housing Opportunity proposal to allow industrial uses into commercial areas and commercial development in residential areas, this proposal would allow the conversion of commercial properties into residential development. While this may make sense for large commercial office buildings in Manhattan, this would be applicable for all commercial buildings throughout the city. A targeted program that focuses on large-scale office towers to create actual affordable housing to scale – where it is needed – would be the right approach, not a broad-brush “One Size Fits All” program. **Reject and Separately Reintroduce with Targeted Scope.**

8. Small and Shared Housing – Re-introduce housing with shared kitchens or other common facilities. Eliminate strict limits on studios and one-bedroom apartments.

This is an absolutely terrible idea to create on an AS-OF-RIGHT basis, as the goal is to re-create SROs (Single Room Occupancy Dwellings) across the city. This also corresponds with the proposed limiting and removal of the DUF (Dwelling Unit Factor), a number for each zone that limits the number of units that can be built. **If adopted, this proposal will take us straight back to the 19th century. Reject!**

9. Campus Infill – Make it easier to add new housing on large sites that have existing buildings on them and already have ample space to add more, (e.g. church with an oversized parking lot).

This would allow massive increases in density and height to all properties of 1.5 acres or larger. This would also take the “garden” out of garden apartments. In addition, this proposal would give all religious organizations the ability to build high-density apartment complexes on their property regardless of the density of the neighborhood, following the Transit Zone regulations even if they aren't located there. **Reject!**

10. New Zoning Districts – Create new Residence Districts requiring Mandatory Inclusionary Housing that can be mapped in central areas in compliance with state requirements. (Citywide)
The new proposed zoning districts, including R11 and R12, will allow massive increases in density and height wherever they are mapped. This follows the recent lifting of the FAR cap Statewide, to allow an increase in FAR of up to 18 from 12. **Note: These zoning districts could be mapped citywide and could lead to a change of all high-density zoning to increase the scale of development everywhere (as is being proposed in the lower-density zoning categories already in this package). Reject!**
11. Update to Mandatory Inclusionary Housing – Allow the deep affordability option in Mandatory Inclusionary Housing to be used on its own. (Citywide)
This proposal goes in the right direction in terms of encouraging real affordable housing but remains below the threshold where it is useful to create meaningful change in communities that need it. **Reject.**
12. Sliver Law – Allow narrow lots to achieve underlying Quality Housing heights in R7-R10 districts
This proposal brings us back to where we were in the 1980s when the Sliver Law was first created to STOP super-narrow buildings. In addition, there are similar proposed regulations in the lower density zones that will make it easier to build on tiny scraps of land. **Reject!**
13. Quality Housing Amenity Changes – Extend amenity benefits in the “Quality Housing” program to all multifamily buildings, and update to improve incentives for family-sized apartments, trash storage and disposal, indoor recreational space, and share facilities like laundry, mail rooms, and office space. (Citywide)
This proposal sounds reasonable on its face, but upon closer examination reveals that it is more window dressing than substantive changes. **Reject.**
14. Landmark Transferable Development Rights – Make it easier for landmarks to sell unused development rights by expanding transfer radius and simplifying procedure. (Citywide)
This proposal goes hand in hand with the fact that all historic districts and special districts will be required to allow for massive increases in density. In other words, they will be treated like any other part of the city, taking away their special status. In addition, for the first time, air rights and transferable FAR will be allowed in lower density (R1- R5) historic districts which will also be subject to Transit Zones, Town Center Zoning and “Campus Infill” AS-OF-RIGHT increases in density. **Reject!**

15. Railroad Right-of-Way – *Simplify and streamline permissions for development involving former railroad rights of way. (Citywide)*

Railroad Rights-of-Way should be discussed on a case-by-case basis through the normal ULURP process, just as mapped and unbuilt roads are. Whether owned by the government or an Authority like the MTA, these right-of-ways should not be given special treatment with expedited approvals. Reject.